ALJ/CMW/mrj

Mailed 8/9/99

Decision 99-08-020 August 5, 1999

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking On The Commission's Own Motion Into Monitoring Performance Of Operations Support Systems.	Rulemaking 97-10-016 (Filed October 9, 1997)
Order Instituting Investigation On The Commission's Own Motion Into Monitoring Performance Of Operations Support Systems.	Investigation 97-10-017 (Filed October 9, 1997)

(See Appendix A for List of Appearances)

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OPINION

Summary

Today we take a major step toward ensuring that local telephone service in California becomes fully and irreversibly competitive.[1] We do this by adopting a comprehensive framework of performance measurements, standards, and related procedures that will provide the Commission with the information necessary to ensure that Pacific Bell (Pacific) and GTE California, Inc. (GTEC), California's two major incumbent local exchange carriers (ILECs), provide their competitors, the competitive local exchange carriers (CLECs), nondiscriminatory access to their network ordering systems .[2] Providing CLECs parity of access to these network ordering systems, known as Operations Support Systems (OSS), allows a CLEC the opportunity to provide its customers the same service quality and timeliness being provided by Pacific's and GTEC's retail customer service representatives; this access is critical to affording CLECs a meaningful opportunity to compete in California's local telecommunications market.

The OSS performance measurements and standards we adopt today, as set forth in Appendix B, represent in large part the collaborative work of Pacific,

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[1] We first set forth the goal of opening the local telecommunications market to competition in our November 1993 report entitled Enhancing California's Competitive Strength: A Strategy for Telecommunications Infrastructure. The California Legislature subsequently adopted Assembly Bill 3606 (Ch. 1260, Stats.1994), expressing similar legislative intent to open telecommunications markets to competition by January 1, 1997.

[2] This decision sets performance measurements for California's two largest ILECs, Pacific and GTEC. In the OIR/OII initiating this proceeding, the Commission chose to move forward first with these companies and then, in a future phase of this proceeding, to consider the smaller ILECs.

GTEC, the CLECs, and our Telecommunications Division staff. The parties participated with our staff in a series of workshops over a one-year period. Their hard work culminated in a Partial Settlement Agreement covering 44 comprehensive OSS performance measurements, related standards, and auditing, reporting, and review procedures. In this decision we resolve the remaining disputed issues and adopt final OSS Performance Measurements; we also adopt the parties' recommendation to review and refine these measurements in February 2000.

We do not address in this decision the level or method of assessing penalties for failure of performance; this record is before us in the Incentives Phase of this proceeding. Nor do we consider the process and procedures that should be followed to upgrade and change the interfaces used by the CLECs to access Pacific/GTEC's OSS systems; the protocols for this are before us separately as a proposed Change Management Settlement.

The OSS performance measurements, standards, and related procedures set forth in Appendix B, provide the Commission a critical part of the framework necessary to evaluate whether the OSS Pacific and GTEC offer to their competitors are sufficient (1) to meet the Section 251(c) (2) requirements of The Telecommunications Act of 1996 (TA96), and (2) for the Commission to evaluate and advise the Federal Communications Commission (FCC) on Pacific's application for long distance telecommunications authority under Section 271 of TA96.

I. Procedural Background

On October 9, 1997, the Commission initiated this formal rulemaking proceeding and investigation as a procedural vehicle to accomplish three goals:

- to determine reasonable standards of performance for Pacific and GTEC in their OSS,

- to develop a mechanism that will allow the Commission to monitor improvements in the performance of OSS, and
- to assess the best and fastest method of ensuring compliance if standards are not met or improvement is not shown.[3]

In Decision (D.) 96-02-072 in our Local Competition proceeding, we had earlier adopted a rule relating specifically to the implementation of OSS. However, this rule contained no monitoring requirement to ensure that the systems actually implemented by Pacific/GTEC met the CLECs needs.[4] The catalyst for opening this present rulemaking was the record developed in three consolidated complaint cases decided in D.97-09-113. In D.97-09-113, we recognized that the Commission did not have the detailed information necessary to monitor and oversee Pacific/GTEC's OSS deployment in a manner that would ensure their deployment facilitated, rather than inhibited, the growth of competition in the local market.

We also recognized that we did not have the necessary measures, standards, and incentives to evaluate whether Pacific/GTEC's OSS systems comply with the requirements of TA96 and the FCC's implementing rules. In the August 1996 Local Competition First Report and Order, the FCC commented, generally, that ILECs must provide CLECs with access to the pre-ordering, ordering, provisioning, billing, repair, and maintenance OSS sub-functions

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[3] In its OIR/OII, the Commission noted that this proceeding will also provide us with performance measures and incentives which will facilitate an informed evaluation of Pacific's OSS system under its § 271 application process.

[4] See D.96-02-072, Appendix E, Page 14.

pursuant to the Act such that CLECs are able to perform such OSS sub-functions in "substantially the same time and manner" as the ILECs can for themselves.[5]

In August of 1997, the FCC's Ameritech opinion analyzed the relation of the nondiscriminatory access requirements of § 251(c) to a Bell Operating Company's (BOC's) § 271 application, and clarified that for those OSS subfunctions with retail analogs, a BOC "must provide access to competing carriers that is equal to the level of access that the BOC provides to itself, its customers, or its affiliates, in terms of quality, accuracy, and timeliness."[6] The FCC further clarified in the Ameritech Opinion that for those OSS functions with

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[5] See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, 11 FCC Rcd 15499, 15763-64 [¶ 518] (1996) ("Local Competition First Report and Order"), aff'd in part and vacated in part sub nom. Competitive Telecommunications Ass'n v. FCC, 117 F.3d 1068 (8th Cir. 1997) and Iowa Utilities Bd. V. FCC, __ U.S.__, 119 S. Ct. 721 (1999).

[6] See In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA service in Michigan, Memorandum Opinion and Order, 12 FCC Rcd 20543, 20618-19 [¶139] (1997) (Ameritech Michigan Order), writ of mandamus issued sub nom. Iowa Utils. Bd. V. FCC, No. 96-3321 (8th Cir. Jan. 22, 1998). (Ameritech Opinion); see also, In the Matter of Application of Bellsouth Corporation, et al., for Provision of In-Region, InterLATA services in Louisiana (BellSouth (Louisiana II) Opinion) CC Docket No. 98-121, FCC 98-271 (10-13-98), paragraph 87 (citing, Ameritech Opinion at 12 FCC Rcd 20618-19). See also, Ameritech Opinion at ¶131, wherein the FCC makes the following statement regarding application of the § 251(c) requirements to a BOC's § 271 application:

"Because the duty to provide access to network elements under section 251(c)(3) and the duty to provide resale services under section 251(c)(4) include the duty to provide nondiscriminatory access to OSS functions, an examination of a BOC's OSS performance is necessary to evaluate compliance with section 271(c)(2)(B)(ii) and (xiv)."

no retail analog, a BOC must offer access sufficient to allow an efficient competitor "a meaningful opportunity to compete."[7]

Therefore, in the OIR/OII we proposed a set of interim rules that would allow us to expeditiously implement an OSS monitoring program. We used a variety of sources to develop the draft performance measures, relying primarily on the consolidated complaint cases and the FCC's Ameritech Michigan Decision, as well as suggestions from industry working groups. Our proposed rules required Pacific/GTEC to provide to the Commission and to each CLEC purchasing interconnection: (1) Performance Monitoring Reports, on at least a monthly basis, that measure and report at a specified level 23 OSS functions; (2) access to the available data and information necessary for a CLEC to verify the accuracy of the Performance Monitoring Reports; (3) uniform interfaces for the CLECs to use to obtain access to OSS; and (4) operational testing of the interfaces used by the CLECs to access OSS functions. The Commission also proposed establishing an Expedited Dispute Resolution procedure to timely resolve disagreements relating to the rules.

In the OIR/OII, we recognized that some existing interconnection agreements between Pacific/GTEC and individual CLEC's addressed OSS performance, but not in the comprehensive detail we proposed. We found that while the OSS performance measurements contained in individual interconnection agreements might vary from those we ultimately adopted in this proceeding, those agreements all included clauses allowing the agreements to be amended by the parties.

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[7] See Ameritech Opinion at 12 FCC Rcd at 20619 [¶ 141]; See also, BellSouth (Louisiana II) Opinion at ¶ 87 (citing Ameritech Opinion at 12 FCC Rcd at 20619).

Opening comments on the proposed interim rules were filed by interested parties on November 20, 1997, and reply comments were filed on December 11, 1997. After review of the comments, the assigned Administrative Law Judges (ALJs) and Telecommunications Division staff, in consultation with the assigned Commissioner, determined that the best way to proceed in developing final OSS performance measurements was to encourage parties to reach consensus through informal technical workshops.

In April 1998, the Commission sponsored a series of workshops to address the issues raised in parties' comments. These workshops lasted approximately three weeks, ending in May 1998. At that point, Pacific supplemented the comments it had filed on November 20, 1997.

Following the workshops, a working group of CLECs and Pacific/GTEC continued to identify open issues and clarify some of the consensus that had been tentatively reached in the workshops. Subsequent findings were shared with the larger CLEC community in order to elicit their input and resolve open issues. In addition, most of the parties were also active in performance measurement workshops held in Nevada by the Nevada Public Service Commission. Each party that participated in the April and May workshops in California received updates of the Nevada negotiating process at the same time as those updates were being provided to the individuals who actively participated in the Nevada workshop. [8]

Based on their collaborative work, on August 7, 1998, the CLECs and Pacific/GTEC jointly submitted a revised performance matrix to the

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[8] Parties in the Nevada proceeding reached a settlement of OSS performance measurements in early June 1999.

Telecommunications Division staff and on August 21, 1998, met with the staff to provide a status report on the entire set of performance measurements and standards.

The development of performance standards required an examination of whether a retail analog or a benchmark should constitute the standard against which a particular OSS performance measurement should be evaluated.[9] On June 19, 1998, Pacific/GTEC provided staff with statements of position on analogs and benchmarks. In late July and mid-August of 1998, respectively, the CLECs and Pacific/GTEC exchanaged position statements with respect to analogs and benchmarks.

In November of 1998, the CLECs and Pacific/GTEC established a drafting subgroup to document the agreements reached. On November 20, 1998 MCI Telecommunications Corporation (MCI), gave notice to all parties to this proceeding, pursuant to Rule 51.1(b) of the Commission's Rules of Practice and Procedure, that a settlement conference would be held on issues relating to OSS performance measurements. A first draft of the settlement was mailed to all parties on the service list on November 27, 1998. The parties continued to meet and the Telecommunications Division staff sponsored additional workshops on December 14-16, 1998.

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[9] Reliance upon a "retail analog" requires a comparison between Pacific/GTEC's OSS performance on behalf of a CLEC with the same OSS function that Pacific/GTEC provides to itself. If Pacific/GTEC do not provide a comparable retail service and, therefore, no retail analog exists, a "benchmark" is used to gauge Pacific/GTEC's OSS performance.

On January 7, 1999, a Joint Motion for Adoption of Partial Settlement Agreement was filed by Pacific, GTEC, and the CLECs together with a Joint Partial Settlement Agreement Re: Performance Measurements.[10]

The settling parties submitted opening comments on the remaining open issues on January 8, 1999 and reply comments on January 25, 1999. The parties also continued to informally meet and provide the Commission additional updates on issues.

An ALJ ruling directed the settling parties to file on April 30, 1999, an addendum to their January 7, 1999 Joint Partial Settlement Agreement that reflected the additional agreements they had reached since the filing. This was because the record was unclear and incomplete as to Pacific's, GTEC's, and the CLEC's position on all performance measurement issues. Parties were directed to file an addendum containing all additional agreements, as well as an updated performance measurement matrix reflecting all final agreements contained in the addendum. Parties were directed not to further elaborate on issues that were not settled. With respect to issues not settled, parties were directed to refrain from further comments. On April 30, 1999, the amended Joint Partial Settlement Agreement (Amended Agreement) was filed.

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[10] The CLECs entering the settlement agreement are: AT&T Communications of California, Inc. (AT&T); MCI; Sprint Communications Company L.P. (Sprint); ICG Telecom Group, Inc. (ICG); Cox California Telecom, L.L.C. (Cox), Covad Communication Company (Covad); MediaOne Telecommunications of California, Inc. (MediaOne); NorthPoint Communications, Inc.; Time Warner Telecom of California, L.P. (Time Warner); California Cable Television Association (CCTA); and Electric Lightwave, Inc.

II. The Amended Joint Partial Settlement Agreement (Amended Agreement)

The Amended Agreement, filed by the parties on April 30, 1999, reflects the careful time and attention all parties gave to the year-long collaborative workshop process. The Amended Agreement is a comprehensive document that serves as the foundation for Appendix B. It includes 44 performance measurements under the following OSS categories: pre-ordering, ordering, provisioning, maintenance, network performance, billing, database updates, collocation, and interfaces. Each performance measurement is separately presented in a concise, uniform table format that includes the following information: a description, calculation formula, level of disaggregation, reporting requirements, geographic level, measurable standard, business rules, and notes. Each adopted measurable standard indicates the retail analog or a benchmark to which it is set.

In their January 7 motion, the settling parties (parties) request the Commission adopt the Amended Agreement because it is reasonable in light of the whole record of competition in the California local exchange market, consistent with the stated objectives of the Commission in this proceeding, consistent with applicable law, and meets the Commission's public interest test for the approval of settlements. [11] (Rule 51.1(e))

In their January 7 motion, the parties also state that the Amended Agreement embodies the best efforts of the CLECs, Pacific, and GTEC to craft performance measurements that describe the quality of OSS being provided to

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[11] While the January 7 motion addresses the Joint Partial Settlement Agreement and not the April 30, 1999 Amended Agreement, the Amended Agreement is the successor to the Joint Partial Settlement Agreement and we treat it here as such.

CLECs in California. The parties include many of the carriers that will be most directly affected by the standards by which Pacific's and GTEC's OSS are provided; in turn, these CLECs include some of Pacific/GTEC's wholesale customers who are most likely to compete against Pacific/GTEC by providing local service options to California consumers. While agreement has not been reached on all of the performance measurement issues, a majority of the issues are settled.

The parties state that the agreed-to performance measures in the Amended Agreement are consistent with the requirements of applicable law because they provide one objective means to help assess whether Pacific/GTEC is providing its competitors with sufficient, non-discriminatory access to OSS as required by TA96.

The parties include a reservation of rights with the Amended Agreement. They state that to the extent that the Amended Agreement addresses issues in this proceeding, the Amended Agreement resolves those issues. However, by seeking approval of the Amended Agreement, the parties make no representation that the agreements within it constitute a definitive or conclusive standard for Pacific's or GTEC's compliance with TA96. By agreeing to the performance measures contained in the Amended Agreement, Pacific and GTEC do not make any admission regarding the propriety or reasonableness of establishing performance penalties in any other proceeding. [12]

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[12] Pacific and GTEC specifically state they (1) do not make any admission regarding the propriety or reasonableness of establishing performance penalties; (2) reserve the right to contest the level of disaggregation for purposes of assessing penalties; (3) reserve the right to contend that any resulting penalties should be viewed as liquidated damages and as the exclusive remedy for any failure of performance; and (4) do not admit that an apparent less-than-parity condition reflects discriminatory treatment without further

Footnote continued on next page

Finally, the parties state that there are outstanding issues which the Commission must resolve in order to enact a comprehensive framework for evaluating whether the OSS that Pacific and GTEC offer to their competitors is sufficient to meet the requirements of TA96. They suggest that the opening and reply comments filed on the outstanding issues are a sufficient record on which the Commission may base its decision on the unresolved issues.

In reviewing the amended agreement, we find that, to the extent it addresses and resolves issues, the agreements reached are reasonable. The scope of the Amended Agreement provides the comprehensive framework we need to monitor and ensure that Pacific/GTEC provide the CLECs nondiscriminatory access to OSS. The technology being used to deploy OSS is still being developed and tested and is often quite technically complex. The technical working and drafting groups that participated in the collaborative workshop process were in the best position to understand OSS technology and to articulate specific measurements, standards, and related procedures.

We discuss each measurement in the following section and make specific findings on the reasonableness of many of the issues covered in the Amended Agreement.

In several instances, all of which we note in Section 3, the parties have agreed to further collection of data or discussion prior to recommending an

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factual analysis. The CLECs state that (1) by executing this agreement, CLECs do not agree with, endorse, or otherwise concur in the terms of Pacific/GTEC's reservation of rights; (2) CLECs reserve the right to contend that Pacific/GTEC's compliance with the performance measures and standards in the Agreement does not conclusively demonstrate Pacific/GTEC's compliance with TA96; and (3) CLECs reserve the right to contend that Pacific/GTEC's compliance with the performance measures and standards does not conclusively demonstrate the existence of an open competitive local market.

analog or benchmark. While we find this is less satisfactory than resolving an issue, we recognize the complexity involved in setting OSS performance measurements and standards and find that a procedural agreement and timetable is beneficial.

In deciding the outstanding issues not covered under the Amended Agreement, we often direct parties to file additional information. In these instances, we have set a uniform date of February 1, 2000, to conform with the timetable for the review process proposed by parties. (See Measurements 1, 2, 3, 6, 35, 37, 38, and 39.) Following the February 1st filing, a prehearing conference should be held February 16, 2000 to discuss the schedule and process for the review.

Based on the above discussion, we find that the Amended Agreement is reasonable in light of the whole record, consistent with law, and in the public interest. The Amended Agreement also meets the criteria of an "all party" settlement which the Commission has previously found is a reliable guidepost to reasonable outcomes.[13] Therefore, we adopt the Amended Agreement.

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[13] D.92-12-019 is the leading decision on all-party settlements. In that decision, the Commission said that we would be "prepared to adopt a settlement that meets sponsorship and content criteria" pertaining to "both the identity and capacity of the sponsoring parties and the terms of their recommendation. As a precondition to our approval" of a proposed all-party settlement, we said that we would expect the record to support the following findings:

"a. (that) all active parties to the instant proceeding" join in the sponsorship;

"b. that the sponsoring parties are fairly reflective of the affected interests;

"c. that no term of the settlement contravenes statutory provisions or prior Commission decisions;

Footnote continued on next page

III. Adopted Performance Measurements

A. PRE-ORDERING MEASUREMENTS

Measurement 1: Average Response Time (to Pre-Order Queries)

This measurement calculates the average time that it takes for Pacific/GTEC to respond to pre-order queries. CLECs submit pre-order queries to Pacific/GTEC to determine the availability of services requested by the customer, to verify customer information, including which services the customer is currently receiving, to request a due date for a service appointment, etc. The measurement requires separate reporting based on the type of information requested. The amount of time it takes for the CLEC to obtain a response to these queries, often while the customer is on the line, has an important effect on how the customer perceives the CLEC's capabilities.

The parties have agreed upon the types of requests that will be measured, but disagree as to the parameters of the measurements and the appropriate standards for comparison.

CLECs want Pacific/GTEC to break down the pre-order response time calculation into two parts: interface transaction time and legacy transaction time.[14] Additionally, CLECs want legacy transaction time tracked uniquely for CLEC requests and Pacific/GTEC retail requests.

Pacific has agreed to disaggregate its systems so that it can measure pre-ordering interface transaction time and legacy system time independently.

"d. that the settlement conveys sufficient information to permit us to discharge our future regulatory obligations with respect to the parties and their interests." (46 CPUC2d at 550-551, footnote omitted.)

[14] Legacy is the name given to Pacific/GTEC's core operations support systems.

Pacific does not support reprogramming its legacy system to differentiate between CLEC and Pacific retail requests because of the high cost relative to the little additional information gained. Instead, Pacific proposes upgrading its systems to capture sampling of retail request response times. CLECs agree to Pacific's sampling proposal but argue that the sampling be permanent. We find the CLECs' position reasonable, since once Pacific has made adjustments to allow for sampling, Pacific can measure its retail query response times without considerable additional expense. This allows the Commission to ensure that Pacific's system continues to provide non-discriminatory processing.

Pacific and the CLECs agree that legacy transaction time should be measured by a standard of parity. They disagree, however, on the appropriate measurable standard that should apply to interface transaction time. As the process of disaggregating interface transactions from legacy transactions is still underway, there is currently insufficient data to set an appropriate interface benchmark. Pacific should collect data on pre-ordering interface transaction time and file its proposed interface transaction time benchmark levels with the Commission by October 1, 1999.

GTEC opposes the disaggregation of response times because its system is unable to make the distinction between interface and legacy transaction times. As such, we find that GTEC may reasonably report the overall average response time for pre-order inquiries. GTEC should complete any necessary system upgrades within two months of the effective date of this decision. Given that the process for measuring response times is not yet in place, there is insufficient data to set a benchmark standard. Therefore, GTEC should begin diagnostically reporting average response times under the terms of the measurement within two weeks after the close of the month in which it begins measuring response times. By February 1, 2000, GTEC should submit a

proposed benchmark standard for overall average response time to the Commission.

In the interim, and within 90 days of the effective date of this order, GTEC should obtain and complete a third party audit to verify that GTEC's legacy systems do indeed process CLEC pre-ordering queries as quickly as they process GTEC's own retail pre-ordering queries. If, after examining GTEC's diagnostic reports and the results of the third party audit, CLECs find this information suggests discriminatory processing of pre-ordering requests by GTEC's legacy systems, CLECs may petition the Commission to revisit the possibility of requiring GTEC to develop the ability to track and report legacy system transaction times for CLEC and GTEC retail requests independently.

Although the parties agree generally on the categorization of pre-order queries for purposes of measurement, they disagree on whether and to what extent response times for inquiries into facility availability need to be measured.

Information regarding facility availability is vital to CLECs' ability to attract new customers and compete with Pacific/GTEC. Pacific/GTEC are currently able to respond in a minute or less to most retail customers' service inquiries with estimates of when their service can be initiated; this occurs while the customer is still on the phone. To be reasonably conducive to competition, Pacific/GTEC's OSS need to be capable of allowing the CLECs to do likewise in handling their customers' pre-order queries.

Pacific currently provides electronic access to loop length information. Pacific augments this information by a manual process, K1023, which provides additional loop qualification information. CLECs argue that Pacific should independently calculate response times for all processes by which

Pacific ascertains the information sought by the CLECs, both electronic and manual.

Pacific agrees with the CLECS, except that it opposes measuring K1023 response time because it is costly and, Pacific claims, the process offers parity by design.[15]

Pacific's K1023 process is very important for CLECs trying to compete with Pacific for business customers, many of whom order large numbers of lines on short notice. As with most manual processes, the potential for discrimination in the order or speed of handling these requests is large; a manual system cannot meet the definition of parity by design. Despite the fact that measuring such manual processes is often expensive, the importance of this information to fostering a competitive local market necessitates that Pacific measure K1023 response time. Since Pacific currently utilizes the K1023 process for its retail customers, parity between the provision of this information to CLECs and provision of this data to Pacific's retail operations is the appropriate measurable standard.

GTEC opposes this measurement because it currently has no processes in place for responding to facilities availability inquiries. The importance of facility availability information to CLECs' ability to provide competitive service requires that GTEC remedy this situation. We therefore find that GTEC should (a) obtain and complete a third-party audit within 90 days of this order to determine what processes are currently used by GTEC to ascertain facility availability in either the retail or wholesale context; (b) determine,

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[15] "Parity by design" means Pacific's and/or GTEC's system is incapable of discrimination between its own retail orders and CLEC orders.

considering the results of the audit, what programming changes are necessary so that GTEC can timely respond to CLEC requests for facilities availability information; and (c) provide a complete description of those changes and timeline for implementation to the Commission by February 1, 2000. This development and implementation process should adhere to the change management rules agreed to by the CLECs and GTEC.

GTEC states that it does allow CLECs to inquire into facilities availability by submitting a service order inquiry Local Service Request. For this specific type of query, GTEC's initial third-party audit should verify whether these processes provide facility availability information to CLECs and GTEC retail in a manner that is "parity by design."

The Commission is concerned that despite the importance of information regarding facility availability, much ambiguity remains in the terms of this measurement. We therefore find that Pacific, GTEC, and the CLECs should work together to further define the parameters of those processes and measurements necessary to provide CLECs with prompt responses to inquiries into facilities availability. This collaboration should assist GTEC in developing the programming changes described above. The parties should make a joint recommendation to the Commission by February 1, 2000, specifically defining all processes by which Pacific/GTEC determine facility availability and basic loop characteristics, and how those processes can be measured. The parties should likewise determine what additional processes are necessary and present a timeline for implementing them.

A final contested issue between GTEC and the CLECs involves the appropriate measurable standard for electronically transmitted manually processed Customer Service Record (CSR) requests. Both the CLECs and Pacific have agreed that a benchmark of 95% of requests responded to within 4 hours is

a reasonable standard. GTEC has not specifically addressed why this benchmark is unattainable or unreasonable. We therefore, find that the same benchmark for electronically transmitted manually processed pre-order inquiries should apply to both Pacific and GTEC.

For manual CSR requests, the CLECs agreed to a standard of 95% in 24 hours for GTEC; we adopt this proposal in Appendix B.

B. ORDERING MEASUREMENTS

Measurement 2: Average Firm Order Confirmation/Local Service Confirmation Notice Interval

When a CLEC submits an order for local telephone services to Pacific/GTEC, Pacific/GTEC respond with a notice (a Firm Order Confirmation or FOC) confirming that the order was received in valid form and committing to a due date for initiation of service. This measurement calculates the average interval from receipt of a service request by Pacific/GTEC to return of a Firm Order Confirmation to the CLEC. The measurement is divided into three subgroups, defined by the mode of transfer of information between the CLEC and Pacific/GTEC. The three modes of order processing are: (1) electronically received and electronically handled, (2) electronically received and manually handled, and (3) manually received and manually handled.

The parties have agreed on some aspects of this measurement; however, there remain two unresolved issues: (1) whether the standard of comparison for this measurement should be a retail analog or a performance benchmark, and (2) if the latter, then what the benchmark(s) should be, for each of the three order processing modes.

The CLECs argue that a retail analog exists for each of the three order categories. In the alternative, the CLECs have proposed an interim benchmark, to be revisited in 6 months, after additional data can be collected.

We find that the CLECs have presented insufficient evidence to firmly support their claim that a parity standard should apply and, therefore, we adopt a benchmark standard close with prior par.

We invite the CLECs and Pacific/GTEC to develop evidence that a retail analog applies or, in the alternative, to demonstrate that the benchmark standards require adjustment, and to present their findings to the Commission by February 1, 2000.

The benchmarks advocated by the parties for the three order processing modes are as follows:

	Pacific	GTE	CLECs
Fully electronic	30 minutes	---	5 minutes
Electronic-to-manual	12 hours	8 hours/13 hours[16]*	4 hours
Manual-to-manual	12 hours	8 hours/13 hours*	6 hours

a. Electronically Transmitted/Electronically Processed Service Requests

We find that for fully electronic orders, an interim benchmark of 20 minutes for both Pacific and GTEC should apply. Pacific itself acknowledges in its opening comments that electronic flow through is a real-time process, usually adding up to five to ten minutes. As the CLECs point out in their reply comments, there was considerable analysis and discussion in the December workshops on this issue. Based on Pacific's statement and the arguments of the CLECs in their reply, the Commission finds that a benchmark of 20 minutes is readily attainable by Pacific. Pacific argues that possible system

[16] *GTEC proposes an interim diagnostic benchmark of 8 average business hours for simple orders and 13 average business hours for complex orders until 2/2000. GTEC supports removal of the diagnostic status after 2/2000.

failures might impact its ability to process the orders in real time. However, as the benchmark is set at twice the upper end of the range of times that processing might take and is an average, we find that the benchmark accommodates "real life factors, such as volume spikes," about which Pacific is concerned. The parties propose to formally review all benchmarks in February of 2000, at which time they can present evidence that the benchmarks require adjustment.

GTEC currently has no fully electronic/flow-through order processing. Because efficient, rapid order processing is essential to a competitive local telephone market, we find that it is necessary for GTEC to program its systems to incorporate fully electronic processing. GTEC should have fully electronic order processing in operation as soon as possible but no later than February 1, 2000 that will allow it at a minimum to meet the 20 minute average response time benchmark.

b. Electronically Transmitted/Manually Processed Service Requests

For service order requests electronically submitted and manually processed, we find for the reasons discussed below, that a benchmark average response time of 6 hours should apply to Pacific and GTEC. The CLECs request a benchmark of four hours, arguing in their reply comments that Pacific has been rendering service to the two biggest CLECs in under four hours. As the benchmarks for this measurement are interim, however, the Commission elects a more readily attainable six-hour benchmark until additional data can be gathered. Pacific seeks a benchmark of 12 hours, but fails to explain why the shorter timeframe with which it has complied in the past should not be adopted. Rather, Pacific in its opening comments simply states that it does not believe that it can support the more stringent benchmarks proposed by the CLECs. In the absence of an explanation, the Commission is persuaded that the six-hour

benchmark adopted for electronically submitted/manually processed service requests is readily achievable by Pacific and GTEC and, therefore, reasonable.

c. Manually Transmitted/Manually Processed Service Requests

Processing manually submitted orders sent via facsimile is inherently more labor-intensive than well-designed electronic order submission systems. Given the potential for errors and confusion in receiving, separating, distributing, and deciphering high volumes of faxed orders, we find a benchmark of an average response time of 12 hours to be a reasonable interval for processing this more labor-intensive form of ordering.

d. Held and Denied Interconnection Trunk Requests

Parties have agreed that the average time Pacific/GTEC take to release held and denied interconnection trunk requests should be reported as a diagnostic measure beginning in November 1999. The parties should revisit the issue to develop a benchmark standard and present their findings and proposals to the Commission by February 1, 2000.

Measurement 3: Average Reject Notice Interval

When a CLEC submits an order for local telephone services to Pacific/GTEC, Pacific/GTEC respond with either a Firm Order Confirmation, the subject of Measurement 2, or a notice rejecting the service request. This measurement calculates the average interval from receipt of a service request by Pacific/GTEC to return of a reject notice to the CLEC. It is the counterpart to Measurement 2, above, and thus raises principally the same issues as that measurement. The measurement is divided into three subgroups, defined by the mode of transfer of information between the CLEC and Pacific/GTEC. The three modes of order processing are: (1) electronically received and electronically

handled, (2) electronically received and manually handled, and (3) manually received and manually handled.

The parties have agreed on some aspects of this measurement; however, there remain two unresolved issues: (1) whether the standard of comparison for this measurement should be a retail analog or a performance benchmark and (2), if the latter, then what the benchmark(s) should be, for each of the three order processing modes.

As in Measurement 2, the CLECs argue that a retail analog exists for each of the three order categories. In the alternative, the CLECs have proposed interim benchmarks, to be revisited in 6 months after additional data can be collected. We find that the CLECs have presented insufficient evidence to firmly support their claim that a parity standard should apply and, therefore, we adopt a benchmark standard. We invite the CLECs and Pacific/GTEC to develop evidence that a retail analog applies or, in the alternative, to demonstrate that the benchmark standards require adjustment, and to present their findings to the Commission by February 1, 2000.

The benchmarks advocated by the parties for the three order processing modes are as follows:

	Pacific	GTE	CLECs
Fully electronic	30 minutes	---	5 minutes
Electronic-to-manual	12 hours	8 hours/13 hours[17]*	4 hours
Manual-to-manual	12 hours	8 hours/13 hours*	6 hours

[17] GTEC proposes an interim diagnostic benchmark of 8 average business hours for simple orders and 13 average business hours for complex orders until 2/2000. GTEC supports removal of the diagnostic status after 2/2000.

For each of the three categories of order processing, Pacific and GTEC propose the same benchmarks as they did for firm order confirmation response times and support their proposals with similar reasoning. CLECs propose the same benchmarks for two of the three order processing modes, but point out that their arguments supporting them are even more forceful in the context of rejected requests. Rejects generally do not require many processes necessary to the issuance of a firm order confirmation, such as facilities and service personnel assignments, and happen almost immediately when due to a technical error in the request. As such, CLECs argue that one would expect the average reject notice interval to be less than that required for firm order confirmations.

We find the CLEC position that shorter times should apply persuasive and, therefore, adopt proposed interim benchmarks of 5 hours for electronically submitted/manually processed service requests and 10 hours for manually transmitted/manually processed service requests. These benchmarks are less than the 6 and 12 hours adopted under Measurement 2.

However, we do not adopt the CLECs' reasoning for fully electronic order processing. We find the evidence presented insufficient to support the conclusion that electronically processed orders that result in rejections are completed in substantially less time than those service requests which result in a firm order confirmation. We therefore adopt the same 20 minute response interval benchmark for all fully electronically processed service requests, whether they result in a reject notice or an FOC.

As explained in Measurement 2, GTEC currently has no fully electronic/flow-through order processing. However, because efficient, rapid order processing is essential to a competitive local telephone market, we find that it is necessary for GTEC to program its systems to allow for fully electronic

processing. GTEC should have a fully electronic order processing procedure in operation as soon as possible but no later than February 1, 2000 that will allow it to meet the benchmark standard set forth above.

The benchmarks adopted for this measurement are interim. The parties should collect data and present proposals to the Commission for permanent benchmarks or a parity standard by February 1, 2000.

Measurement 4: Percent of Flow Through Orders

This measurement captures the percentage of mechanized service requests that are processed on a flow-through basis, without manual intervention. Measuring flow-through is important because it gauges the efficiency with which Pacific/GTEC are processing CLEC service orders. The level of flow-through will be calculated by comparing the actual number of mechanized orders which flow-through without manual intervention with the total number of valid mechanized service requests.

The parties have agreed to revisit the measurable standard to which the percentage of flow-through will be compared in the February 2000 review.

C. PROVISIONING MEASUREMENTS

Measurement 5: Percent of Orders Jeopardized

This measurement captures the percentage of orders processed for which Pacific/GTEC notify the CLEC that the order will not be completed by the date committed on the Firm Order Confirmation. The number of orders jeopardized is compared with the number of orders confirmed. The percent of orders jeopardized is valuable in determining the reliability of Pacific's/GTEC's order confirmations. The extent to which the CLECs receive service when promised bears critically upon their ability to communicate accurate information to their customers. Thus, measuring the percent of orders jeopardized assists us

in ensuring that Pacific/GTEC are providing service sufficient to allow competition to develop.

Pacific, GTEC, and the CLECs have agreed to this measurement and agreed that parity between Pacific/GTEC and the CLECs is the appropriate standard by which compliance will be determined. The terms of the measurement are set forth in detail in the Amended Agreement.

Measurement 6: Average Jeopardy Notice Interval

If Pacific detects that it probably will not meet the due date for service installation specified in its FOC, it issues a notice to the CLEC indicating the order is in jeopardy of missing the due date. If either Pacific or GTEC detects that a previously committed due date has passed and it has not completed its service installation, Pacific or GTEC issues a "notification of missed commitment" to the CLEC. This measurement captures these two subgroups: (1) it calculates the time between the FOC order completion date and time and the date and time when the ILEC issues a notice to the CLEC indicating that an order is in jeopardy of missing the due date (a jeopardy notice), and (2) it measures the time that elapses from the order completion date as stated on the FOC to the time when Pacific/GTEC send a notice stating that the due date or time has been missed. The jeopardy notice calculation is further broken down into two measurements: (1) jeopardies identified during the assignment of facilities, and (2) jeopardies identified during installation.

Jeopardy notices are critical to the CLECs' ability to provide their customers with quality service. If a CLEC is unaware that service orders will not be completed on the committed date or have not been completed by the due date, it cannot take appropriate action by informing its customers or otherwise.

GTEC and Pacific do not take issue with the importance that CLECs place on jeopardy notices; rather they state that their current systems do not enable them to issue jeopardy notices.

Pacific has already begun implementing changes to its system that will allow it to issue jeopardy notices in the categories outlined by this measurement. Pacific has indicated that its system will be operational by August 1999. Pacific should begin issuing jeopardy notices by August 1, 1999 and begin reporting according to the terms of this measurement by September 1, 1999.

Given that the procedures and calculations required by this measurement are not currently in place, we find that the development of an appropriate benchmark standard should be delayed until information on the jeopardy notice processes can be gathered. Therefore, we direct Pacific to work with the CLECs to develop a benchmark proposal during the first four months of reporting. If possible, Pacific and the CLECs should jointly recommend a benchmark standard to the Commission by February 1, 2000. If that becomes impossible, Pacific and the CLECs should file benchmark proposals for comment by February 1, 2000.

Like Pacific, GTEC argues that its system is unable to issue jeopardy notices. Instead of implementing changes to its system, however, GTEC simply opposes this measurement. As stated above, we agree with the CLECs that jeopardy notices play a critical role in the CLECs' ability to provide competitive, quality telephone service. Therefore, we direct GTEC to immediately begin the programming changes necessary to enable it to issue the three types of notices outlined in this measurement. We find a six-month period to complete all programming is reasonable. GTEC should therefore begin issuing jeopardy notices as required by this measurement within 6 months of the date of this

order. If this is deemed a major system change that is prohibited during the 4th quarter 1999 due to Y2K implications, then work is to be resumed as soon as GTEC resumes its internal operational programming. The six-month time period for necessary system changes will be tolled only while all internal operational programming at GTEC is on hold during the Y2K transition. GTEC should commence reporting the measurement by the end of the six month programming period. At that time, GTEC should begin collecting data for the proposal of a benchmark standard. The proposed benchmark should be filed with the Commission within four months of when GTEC begins to report the measure. The benchmark to be proposed by Pacific by February 1, 2000 will serve as an interim benchmark until GTEC has collected sufficient data and submitted a proposal of its own based on that data.

Measurement 7: Average Completed Interval

This measurement captures the average number of business days that Pacific/GTEC take to complete a valid service request. The interval begins upon receipt of a valid, error-free service request and ends on the completion date in the service order system.

Timely completion of service orders is central to the CLECs' ability to provide competitive local exchange service to their customers. Thus, this measurement will allow the Commission to ensure that Pacific/GTEC complete the CLECs' service orders on a non-discriminatory basis by requiring Pacific/GTEC to complete CLEC orders as efficiently as Pacific/GTEC complete their own service orders.

The measurement and terms the parties have agreed upon are set forth in the Amended Agreement.

Measurement 8: Percent Completed within Standard Interval

This measurement calculates the percentage of received, valid service orders which are completed within a standard interval time, based on a consensus as to how long a given procedure should take. It therefore complements information provided by measuring the Average Completed Interval and suggests the extent to which service completion times vary from an expected timeframe.

TA 96 requires Pacific/GTEC to provide CLECs with non-discriminatory service. Additionally, timely completion of CLEC service orders is an important element in the CLECs' success as competitive providers of local telephone service. As this measurement enables the Commission to ensure that Pacific/GTEC are providing timely, non-discriminatory service to CLECs and allowing competition to develop, we adopt it under the terms agreed to by the parties as set forth in the Amended Agreement.

Measurement 9: Coordinated Customer Conversion

Coordinated orders require Pacific/GTEC to disconnect a customer's service. As such, the importance of Pacific/GTEC's completion of a coordinated conversion service order at the committed date and time is magnified: the CLEC needs to be prepared to immediately begin the migrating customer's service to prevent its customer from being without service. This measurement tracks the percentage of coordinated orders completed within one hour of the committed order due time.

The parties have agreed to the terms and standard under which this measurement will be calculated. Given the importance of timely, non-discriminatory order completion, as explained above, we adopt this measurement as set forth in the Amended Agreement.

Measurement 10: Permanent Number Portability (PNP) Network Provisioning

This measure requires Pacific and GTEC to calculate the success rate of PNP network provisioning. Permanent Number Portability is critical to the successful development of competition in local telephone markets. When Pacific/GTEC fail to provision PNP, customers switching to another local carrier but faced with the possibility of interrupted service will have an incentive to continue purchasing telephone service from their current provider.

Pacific acknowledges that PNP network provisioning is important to their competitors' success and thus agrees with the CLECs that measurement of network provisioning element availability is reasonable. Likewise, Pacific appears to have agreed that parity between Pacific and CLECs is the appropriate measurable standard. GTEC does not agree, and in its initial comments alluded to reporting problems arising from the fact that its provisioning tracking system monitored different elements than those which this measurement would track. GTEC's reply comments do not raise that objection; instead GTEC asks for more time to review the measure and states that additional discussion with CLECs is necessary.

GTEC proposes that it be given a six month lead time to put a system in place to allow it to measure this provisioning process.

TA 96 requires the Commission to create conditions under which competition in local telephone markets can develop. In light of the important role of PNP in ensuring that customers switching to a CLEC can do so without service interruption, we find Measurement 10 as set forth in the Amended Agreement for Pacific to be reasonable, and direct that it also apply to GTEC. The Commission finds that in light of the importance of this measurement, the

6 month lead time requested by GTEC is too long. GTEC should begin reporting on this measurement by November 1, 1999.

Measurement 11: Percent of Due Dates Missed

This measurement calculates the percentage of CLEC orders which were not completed by the due date. It thereby measures both the accuracy of information transmitted on Firm Order Confirmations, as well as the timeliness with which Pacific/GTEC are completing CLEC service orders. CLECs depend upon the accuracy of Pacific/GTEC's statements as to timeliness of service completion when they communicate information to their customers. The reliability of key Pacific/GTEC service commitments, such as due dates, is thus an important part of the CLECs' ability to provide competitive telephone service. Furthermore, the speed with which Pacific/GTEC complete service orders impacts the speed with which CLECs can begin to service new customers.

Pacific, GTEC and the CLECs have agreed upon the importance of this measurement as well as on the standard and method by which it will be calculated. The terms of the Percent Due Dates Missed Measurement are set forth in the Amended Agreement.

Measurement 12: Percent Due Dates Missed Due to Lack of Facilities

This measurement is a subset of Measurement 11: it calculates the percentage of due dates which were missed because of lack of facilities. Availability of facilities is normally determined prior to the issuance of a Firm Order Confirmation and, therefore, any lack of facilities should be identified at that time. A service order completion date which was missed due to a lack of facilities is therefore particularly troublesome. Untimely service order completion by Pacific/GTEC can significantly impede the success of CLECs by preventing them from providing their customers with quality service. We find

this measurement necessary to ensure that Pacific/GTEC are deploying facilities management resources sufficient to allow service orders to be completed on time.

Pacific/GTEC and the CLECs have agreed on the reporting requirements of this measurement and to a standard of parity between Pacific/GTEC and CLECs. The terms of the measurement, as adopted in the Amended Agreement, are set forth in Appendix B.

Measurement 13: Delay Order Interval to Completion Date

This measurement captures the average number of calendar days that elapse between a missed due date due to lack of facilities and the date service is finally completed. As explained in Measurement 12, facility availability is normally determined prior to the setting of a due date. As such, due dates should rarely be missed as a result of lack of facilities. This measurement allows the Commission and the CLECs to ensure that Pacific/GTEC are allocating sufficient resources to facilities management, and to ensure that facilities problems that prevent service order completion are rapidly remedied.

Pacific/GTEC and the CLECs have agreed on the reporting requirements of this measurement and to a standard of parity between Pacific/GTEC and CLECs. The terms of the measurement, as adopted in the Amended Agreement, are set forth in Appendix B.

Measurement 14: Held Order Interval

This measurement looks back from a reporting period close date and calculates the average time period for which held orders have been pending. Timely completion of service orders is central to the CLECs' ability to provide competitive service to their customers. By providing the Commission a comparison of the average length of time that held CLEC orders have been pending with the average held interval for Pacific/GTEC orders, this

measurement will allow the Commission to ensure that Pacific/GTEC complete CLEC service orders in a timely, non-discriminatory fashion.

Pacific, GTEC, and the CLECs have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 15: Provisioning Trouble Reports

This measurement captures the number of trouble reports received from a customer , or indirectly through the CLEC the customer has chosen to migrate to, that occur from the time a CLEC places a service order request with Pacific/GTEC until the time the service order is completed. The measurement is calculated as a percentage of the total service orders received in the reporting period. It allows the Commission to assess Pacific/GTEC's processing of competitors' service orders as compared to the manner Pacific/GTEC handle service orders for their own retail customers.

Pacific and the CLECs have reached agreement on all issues under this measurement, as reflected in the Amended Agreement. Part of the agreement reached is a recognition of the need to gain more experience with Permanent Number Portability before adopting a parity measure or benchmark. Pacific and the CLECs will jointly recommend a procedure for measuring PNP success by August 31, 1999.

GTEC and the CLECs have two issues in dispute: (a) whether this measure should apply to GTEC and, if so, (b) what level of detail should be captured in the reporting.

GTEC states it does not support this measure for two reasons. First, it states that a customer choosing to migrate to a CLEC remains GTEC's customer until the service order has been completed and, therefore, GTEC would be violating the customer's confidentiality rights by reporting to the CLEC any trouble reports the customer files in the transition period. Second, GTEC states

that because it does not take trouble reports on a pending service order in its retail operations, there is no analog. If it is directed to report this measure, GTEC states it would require a minimum of 3 to 6 months to implement the measurement and 6 additional months to develop a benchmark.

We find that GTEC must comply with this measure because it provides the only means of identifying troubles reported by migrating customers. The privacy concerns GTEC raises do not involve confidential information and the customer, in choosing to migrate to a CLEC, has effectively provided a release of necessary information to its new carrier. We therefore find that GTEC should immediately begin the programming changes necessary to collect detailed data for customers migrating to a CLEC, similar to that which Pacific has agreed to provide. We find a three-month period to implement the measure is reasonable. If this is deemed a major system change that is prohibited during 4th quarter 1999 due to Y2K implications, then work should be resumed as soon as GTEC resumes its internal operational programming.

GTEC should provide a status report by February 1, 2000 on its implementation of this measure and a proposal for either (a) parity reporting or (b) a benchmark comparable to Pacific's analog.

Measurement 16: Percent Troubles in 30 days for New Orders

This measurement calculates the percentage of customers who report problems with service at some point during the 30 days after completion of a service order by Pacific/GTEC. The measurement allows the Commission to ensure that Pacific/GTEC are completing service changeover orders in a quality non-discriminatory fashion. Unduly troublesome service might dissuade customers from migrating to a CLEC, and thereby impede competition from developing in the local telephone market.

The parties have agreed on the terms of this measurement. Pacific will supply 30-day trouble reports for all of its services. GTEC will supply 30-day reports for designed services. In addition, the parties agree upon the need to gain more experience with Permanent Number Portability before adopting a parity measure or benchmark. Pacific/GTEC and the CLECs will jointly recommend a procedure for measuring PNP success by August 31, 1999. We therefore adopt Measurement 16 under the terms agreed to by the parties and set forth in Appendix B.

Measurement 17: Percent Troubles in 7 Days for New Orders

This measurement applies to GTEC only, and complements Measurement 16 above. It requires GTEC to calculate the percentage of trouble reports received from a customer within 7 days of completion of a service order for non-designed services. The parties have agreed to this measure, except that in the case of PNP services, the parties will jointly recommend a measurable standard by August 31, 1999. GTEC has agreed to comply with the terms of this measurement as set forth in Appendix B.

Measurement 18: Average Completion Notice Interval

This measurement captures the average interval between completion of a service order by Pacific/GTEC and the time when the CLEC receives the notice of completion.

The parties have agreed upon the terms of the measurement and the standard applicable to all interfaces except fully electronic order processing. CLECs argue that a standard of parity should apply. Pacific states that parity is not appropriate because its retail operations generate completion notices slowly. Rather, Pacific asks that the Commission allow it to collect data for six months so that it may propose a reasonable benchmark. We find that there is currently insufficient evidence to conclude that parity should be the appropriate

measurable standard. Therefore, we will adopt an interim benchmark and invite the parties to collect evidence and present either modifications to the interim benchmark levels or by February 1, 2000 propose a parity standard.

As an interim benchmark the CLECs propose an average of 5 minutes, which they claim is generous considering the actual time that the system requires to generate completion notices. We understand their argument, but choose instead an interim benchmark of 20 minutes, the same level we set for Measures 2 and 3. The purpose of interim measures is to put a reasonable standard in place while additional information becomes available. With very little evidence presented on the feasibility of the 5 minute benchmark, we find it more reasonable to adopt a benchmark that appears more readily attainable.

GTEC claims that it currently does not issue completion notices in its retail operation and does not have the capability to do so electronically for CLECs. Prompt transfer of information between Pacific/GTEC and CLECs is necessary if competition in the local telephone market is to develop. Providing only a manual notice of completion for a service order that was submitted on a fully electronic interface simply does not meet a reasonable standard of performance. As such we find that GTEC must make necessary changes to its system to enable it to provide fully electronic completion notices for electronically submitted CLEC orders. GTEC should complete these changes within 90 days of the effective date of this order and commence reporting for fully electronic completion notices and applying the interim 20 minute benchmark at that time. Until that process is in place, the measurable standard for all other interfaces, a benchmark of 90% of completion notices returned to the CLEC within 24 hours of completion of the service order, shall apply to GTEC.

D. MAINTENANCE MEASUREMENTS

Measurement 19: Customer Trouble Report Rate

This measurement calculates the number of network customer trouble reports in a calendar month, as a percentage of the total number of access lines/circuits/UNEs in service at the end of the prior reporting period. The measurement allows the Commission and the parties to compare the quality of facilities and services provided to CLECs and their customers with those provided to Pacific/GTEC customers. The Commission can thereby ensure that Pacific/GTEC is providing CLECs with services and facilities in a non-discriminatory fashion.

The parties have agreed upon the terms of the measurement, and that parity between Pacific/GTEC and the CLECs is the appropriate measurable standard. In addition, the parties agree upon the need to gain more experience with Permanent Number Portability before adopting a parity measure or benchmark. Pacific/GTEC and the CLECs will jointly recommend a procedure for measuring PNP success by August 31, 1999. The terms of Measurement 19 as adopted in the Amended Agreement are set forth in Appendix B.

Measurement 20: Percent of Customer Trouble not Resolved within Estimated Time

This measurement captures the percentage of troubles reported which are not resolved within the time committed to by Pacific/GTEC. The measurement compares the timeliness with which Pacific/GTEC respond to CLEC customer troubles with the timeliness with which Pacific/GTEC respond to troubles reported by Pacific/GTEC customers. It thus enables the Commission and the parties to evaluate the extent to which CLEC customer troubles are resolved in a timely, non-discriminatory fashion.

Rapid resolution of customers' problems is central to CLECs' ability to provide service competitive with that provided by Pacific/GTEC. The parties have recognized this and agreed to report this measurement under the terms set forth in the Amended Agreement. In addition, the parties agree upon the need to gain more experience with Permanent Number Portability before adopting a parity or benchmark standard. Pacific/GTEC and the CLECs will jointly recommend a procedure for measuring PNP success by August 31, 1999. The terms of Measurement 20 as adopted in the Amended Agreement are set forth in Appendix B.

Measurement 21: Average Time to Restore

This measurement calculates average duration of customer trouble reports, and thus complements Measurement 20 above, which measures that percent of trouble reports resolved in the committed timeframe. The measurement compares the timeliness with which Pacific/GTEC respond to CLEC customer troubles with the timeliness with which Pacific/GTEC respond to troubles reported by their own retail customers. It thus enables the Commission and the parties to evaluate the extent to which CLEC customer troubles are resolved in a timely, non-discriminatory fashion.

Rapid resolution of its customers' problems is central to a CLEC's ability to provide service competitive with that provided by Pacific/GTEC. The parties have agreed to report this measurement under the terms reached in the Amended Agreement and set forth in Appendix B. In addition, the parties agree upon the need to gain more experience with PNP before adopting a parity or benchmark standard. Pacific/GTEC and the CLECs will jointly recommend a procedure for measuring PNP success by August 31, 1999.

Measurement 22: Plain Old Telephone Service (POTS) Out of Service less than 24 Hours

This measurement captures the percentage of Plain Old Telephone Service (POTS) out-of-service trouble reports that are resolved within 23 hours of the report. Rapid resolution of POTS trouble is a high priority for all telephone service providers as reliable POTS is a critical aspect of quality retail telephone service. This measurement enables the Commission and the parties to compare the timeliness with which CLEC POTS troubles are resolved with the timeliness with which Pacific/GTEC resolves POTS troubles for its own customers.

The parties have agreed to report this measurement under the terms reached in the Amended Agreement and set forth in Appendix B.

Measurement 23: Frequency of Repeat Troubles in 30-day Period

This measurement captures the percentage of repeat troubles reported which were reported within 30 days of a previous report. The measurement compares the effectiveness with which Pacific/GTEC resolve CLEC customer troubles with the success with which Pacific/GTEC resolve troubles reported by Pacific/GTEC customers. It thus enables the Commission and the parties to evaluate whether Pacific/GTEC are resolving CLEC customer troubles in an effective, non-discriminatory fashion.

Effective resolution of customer problems, and indirectly customer satisfaction, is central to CLECs' ability to successfully compete in the local telephone market. Thus the parties have agreed to report this measurement under the terms reached in the Amended Agreement and set forth in Appendix B. In addition, the parties agree upon the need to gain more experience with Permanent Number Portability before adopting a parity or benchmark standard. Pacific/GTEC and the CLECs will jointly recommend a procedure for measuring PNP success by August 31, 1999.

E. NETWORK PERFORMANCE MEASUREMENTS

Measurement 24: Percent Blocking on Common Trunks

This provision measures the percentage of common and shared trunk groups with blockage in excess of 2%.

Pacific has agreed to the CLEC's proposed benchmark of no more than 2% of common trunk groups blocking at a level of 2%.

GTEC does not support the measure. In its initial comments, GTEC argued that it should not be held to a benchmark for common trunk transport since it could not predict the extent of overflow onto common trunks caused by CLEC usage of dedicated lines.[18]

We agree with the CLECs and Pacific that overflow from dedicated transport onto common trunks will not impair the ability of GTEC to meet the 2% blockage benchmark. Dependable network service is an essential element of a competitive local telephone market. This measurement allows the Commission to ensure that the networks operate at level sufficient to support a competitive environment. We therefore find that the standard set forth in the Amended Agreement and Appendix B is reasonable and attainable.

Measurement 25: Percent Blocking on Interconnection Trunks

This measurement captures the percentage of dedicated interconnection trunks which experience blockage in excess of 2%. Quality network transmission is essential to a CLEC's success in a local telephone market. This measurement allows the Commission to ensure that the networks

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[18] In the Amended Performance Measure Matrix, GTEC no longer asserts this position. Instead it raises issues in violation of the 4/9/99 ALJ Ruling, which directed that "[p]arties should not further elaborate on issues that are not settled." As such, we will only consider those arguments which GTEC raised prior to the 4/9 ruling.

operate at level sufficient to support a competitive environment and that Pacific/GTEC allocate trunk capacity on a non-discriminatory basis.

The parties have agreed to this measurement, the terms of which are set forth in Appendix B.

Measurement 26: Telephone Number Prefix (NXX) Loaded by Local Exchange Routing Guide Effective Date

This measurement calculates the number of telephone number prefixes (NXXs) loaded and tested by the Local Exchange Routing Guide Effective Date. LERG is an independent database that serves the telecommunications industry. It provides standard time intervals for the loading and testing of new NXXs. Pacific's/GTEC's loading of a competitor's NXX is necessary if Pacific/GTEC customers are to be able to call the competitor's customers with that NXX. This measurement allows the Commission and the parties to compare the timeliness with which Pacific/GTEC load and test CLEC NXXs with the timeliness with which Pacific/GTEC load their own NXXs. It likewise allows the Commission to evaluate the efficiency with which Pacific/GTEC are accomplishing this important task. The parties have agreed to report this measurement under the terms set forth in Appendix B.

Measurement 27: Network Outage Notification

This measurement captures the average interval between a network outage and notification of a CLEC by Pacific/GTEC of the outage. The measurement is broken down into sub-categories by type of outage. Prompt notification to CLECs of network problems is necessary to allow them to take appropriate action in response and provide their customers with competitive service. This measurement compares the efficiency with which Pacific/GTEC notify their own departments of an outage with the efficiency with which

Pacific/GTEC notify CLECs of an outage of the same type, and thereby allows the Commission and the parties to ensure that the CLECs are notified of outages in a prompt and non-discriminatory fashion. The parties have agreed to report this measurement under the terms set forth in Appendix B.

F. BILLING MEASUREMENTS

Measurement 28: Usage Timeliness

This measurement captures the average length of time between when Pacific/GTEC record data of usage by a CLEC customer and when the data is transmitted to the CLEC in compliant form. Timely transmission of usage data is necessary for CLECs to be able to bill their customers. In turn, the ability to promptly bill its customers is an important element in a CLEC's success. This measurement thus allows the Commission and the parties to ensure that Pacific/GTEC are transmitting CLEC customer usage data in a non-discriminatory, timely fashion. The parties have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 29: Accuracy of Usage Feed

This measurement captures the completeness of content, accuracy of information and correctness of formatting of usage records transmitted by Pacific/GTEC to CLECs. Accuracy of usage records enables CLECs to promptly and correctly bill their customers, an important element in the CLECs' ability to provide quality competitive service. This measurement thus enables the Commission and the parties to ensure that Pacific's/GTEC's recording and transmittal of CLEC usage data meet a high standard of quality sufficient to support a competitive local telephone market. The measurement is reported by the CLEC as a percentage of all records transmitted. The parties have agreed to postpone setting a benchmark until criteria for the measure can be further

developed and defined. The parties will submit a joint recommendation to the Commission by August 31, 1999.

Measurement 30: Wholesale Bill Timeliness

This measurement captures the number of days between the close of the billing cycle and the date Pacific/GTEC transmit the bill to the CLEC. Timely billing by Pacific/GTEC enables CLECs to promptly and correctly bill their customers, an important element in the CLECs' ability to provide competitive service. This measurement enables the Commission and the parties to ensure that Pacific's/GTEC's wholesale billing of CLEC usage meets a high standard of quality sufficient to support a competitive local telephone market. The measurement is disaggregated by type of usage--Resale, UNE and Facilities/Interconnection—with a benchmark standard of 99% of wholesale bills transmitted within 10 days. The parties have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 31: Usage Completeness

This measurement captures the percentage of usage charges which appear on the correct bill. Timely, complete billing of usage enables CLECs to promptly and correctly bill their customers and collect accurate internal financial data, important elements in the CLECs' ability to provide competitive service. This measurement enables the Commission and the parties to ensure that Pacific's/GTEC's transmittal of usage bills is sufficiently complete and timely to support a competitive local telephone market. The parties have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 32: Recurring Charge Completeness

This measurement captures the percentage of recurring charges which appear on the correct bill.[19] Timely, complete billing of recurring charges enables CLECs to promptly and correctly bill their customers and collect accurate internal financial data, important elements in the CLECs' ability to provide competitive service. This measurement enables the Commission and the parties to ensure that Pacific's/GTEC's transmittal of recurring charge bills is sufficiently complete and timely to support a competitive local telephone market. The parties have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 33: Non-Recurring Charge Completeness

This measurement captures the percentage of non-recurring charges which appear on the correct bill. Timely, complete billing of non-recurring charges enables CLECs to promptly and correctly bill their customers and collect accurate internal financial data, important elements in the CLECs' ability to provide competitive service. This measurement enables the Commission and the parties to ensure that Pacific's/GTEC's transmittal of non-recurring charge bills is sufficiently complete and timely to support a competitive local telephone market. The parties have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 34: Bill Accuracy

This measurement evaluates the accuracy of Pacific/GTEC billing of CLEC usage by calculating the percentage of monies billed without corrections. Accurate billing by Pacific/GTEC enables CLECs to promptly and correctly bill

[19] Parties define "correct" bill as the next available bill.

their customers, an important element in the CLECs' ability to provide competitive service. This measurement enables the Commission and the parties to ensure that Pacific's/GTEC's wholesale billing of CLEC usage meets a high standard of quality sufficient to support a competitive local telephone market. The measurement is disaggregated by type of usage--Resale, UNE and Facilities/Interconnection. The parties have reached an agreement as to the terms and benchmark standards of this measurement as they are set forth in Appendix B.

Measurement 35: Duplicate Billing

This measurement captures the number of former Pacific/GTEC customers who receive erroneous bills after conversion to a CLEC service, as a percentage of the total number of customers who converted to a CLEC telephone service.

No agreement has been reached between Pacific/GTEC and the CLECs on this measurement. The CLECs proposed the measurement out of concern that handling customer inquiries and complaints and working with Pacific/GTEC to clear the duplicate bills drains CLEC resources. Likewise, erroneous billing by Pacific/GTEC creates an impediment to competition in that customers will be dissuaded from converting to a CLEC if they perceive that it will result in time-consuming hassles.

Both Pacific and GTEC counter that the measurement is insufficiently defined to be able to report on it. The measurement contains no timeline for problems which have been corrected, fails to adequately define "former ILEC customers," and does not provide meaningful limitations to the concept of erroneously sent duplicate bills. For instance, does the measurement apply to customers who have switched some, but not all, of their services to a CLEC? Does the measure apply to duplicate bills resulting from a CLEC-caused

error or an outstanding financial obligation to Pacific/GTEC by the customer who converted? We find Pacific/GTEC's arguments regarding the ambiguity of Measurement 35 meritorious and therefore decline to adopt the measure as it is currently written.

On the other hand, we agree with the CLECs that duplicate billing could be an impediment to local competition were it to occur at a material rate. Therefore, we invite the parties to further discuss and consider developing a measurement of the problem alleged, and to present their findings when the Commission next reviews the OSS Measurement Plan in February of 2000. We note also that duplicate billing could become a problem for customers switching from service by a CLEC to service by another CLEC or to Pacific/GTEC. For this reason, the parties should consider a measurement that would require both CLECs and Pacific/GTEC to perform the measurement and report.

Measurement 36: Accuracy of Mechanized Bill Feed

This measurement evaluates the accuracy of mechanized bill feeds. The CLECs will report the percentage of mechanized bill feeds which are passed accurately, under criteria still being developed. The parties have therefore agreed to postpone defining a benchmark standard and performance criteria until further data can be collected. The parties will recommend terms for this measurement to the Commission by August 31, 1999.

G. DATABASE UPDATE MEASUREMENTS

Measurement 37: Average Database Update Interval

This measure captures the interval between the time when CLECs submit information updates to the time when Pacific/GTEC pass the update to customer information to the directory assistance/directory listing databases. Given the importance of timely and accurate directory assistance service to everyone who relies on these services, we find that discriminatory failure by

Pacific/GTEC to pass along customer information updates in a timely manner could substantially impair competition.

GTEC does not argue with this premise—rather it states that its system offers parity by design. To substantiate its claim, GTEC has submitted flow diagrams, and seeks to self-certify that its system offers parity by collecting data over the next several months. The CLECs argue that GTEC's diagrams and offer to self-certify are an insufficient demonstration that its system design compels parity. Instead, the CLECs ask that GTEC be required to offer certified documentation that GTEC's system is designed to operate at full parity, or in the alternative, that GTEC be required to comply with the terms of the compromise reached between the CLECs and Pacific and memorialized in the Amended Agreement.

Under the Amended Agreement, Pacific has agreed that for direct gateway input updates a benchmark standard of 95% of updates processed within 8 days of submission by a CLEC will apply. For service order generated updates, parity will be the appropriate standard.

Given the importance of timely and accurate database updates, we agree with the concerns presented by the CLECs and therefore direct GTEC to present certification by an independent auditor by February 1, 2000, sufficient to satisfy the Commission and the CLECs that GTEC's system offers parity by design. Should GTEC fail to provide adequate certification, it shall commence reporting the average database update interval on an interim basis under terms agreed to by Pacific, as set forth in the Amended Agreement. The interim reporting measure will remain in place until the Commission is able to determine an appropriate final benchmark based on GTEC's system capabilities.

Measurement 38: Percent Database Accuracy

This measure calculates the percentage of Emergency 9-1-1 and Directory Assistance/Directory Listings updates completed without error. Ensuring the accuracy and timely update of these databases, especially 9-1-1, is a top priority.

There are two issues in dispute: (a) how GTEC should verify that its database systems provide parity by design, such that a measurement standard for it is unnecessary; and (b) what procedure Pacific should employ to provide on an interim basis diagnostic-only data on direct gateway updates made by CLECs until the 911/Listings Fix-it Team completes its analysis and verifies that direct gateway updates can never be negatively impacted by Pacific or GTEC's processes and systems.

On the first issue, GTEC is willing to demonstrate that its DA/Listings Database is designed for parity and is willing to discuss a verification process that would be acceptable to the CLECs. The CLECs state that this measure should apply to GTEC unless it can support its claim that CLEC updates receive the exact same treatment and are not subject to any incremental processing delays.

Initially, GTEC proposed to support its claim by a self-certification process while the CLECs insisted there be a certified process that audits and documents the findings. In its reply comments, GTEC states it is willing to meet with the CLECs to discuss the specific details of a "certification document".

We find the CLEC request for an independent auditor to examine and document GTEC's claim is reasonable. Therefore, we direct GTEC to complete an independent audit within 60 days and to serve the report on the Commission and all interested parties. If the audit does not establish parity by design in GTEC's Emergency 9-1-1 and Directory Assistance/Directory Listings

databases, then GTEC should by February 1, 2000 show it can comply with the benchmark established for Pacific.

On the second issue, verification that the CLEC's direct gateway updates can never be negatively impacted by the local exchange company's processes and systems, the parties' comments indicate this is only an issue between Pacific and the CLECs and the area of difference is quite narrow.

Until the 9-1-1/Listings Fix-it Team completes its analysis and determines that direct gateway updates can never be negatively impacted by ILEC processes and systems, the CLECs request that Pacific report it as diagnostic-only data (i.e. not subject to performance incentives and accompanied by the appropriate disclaimers). Pacific agrees to do this, but wants to provide the data in the form of a special study for as long as the Fix-it team requires it to complete its work. It objects to the Commission adopting a permanent measurement now.

We find it reasonable to have the data requested by the CLECs reported as a special study rather than a permanent measurement. Therefore, we direct Pacific to report information on direct gateway updates as a special report until the 9-1-1/Listings Fix-it Team completes its analysis. In the February 2000 review the CLECs can request the Commission revisit this issue if the matter has not been successfully resolved.

Measurement 39: Emergency 911/911 Management System Database Update Interval

This measure requires Pacific and GTEC to calculate the interval from when a CLEC submits an Emergency 9-1-1 update request to when Pacific/GTEC submits the update to the Emergency 9-1-1 Gateway. For service order generated updates, Pacific and GTEC have agreed with the CLECs that parity is the appropriate standard. The parties do not agree on the necessity of

measuring the interval for updates sent directly to the E911 Gateway. Pacific urges that the measurement is unnecessary in light of the fact that it notifies CLECs upon completion of their update requests, allowing the CLECs to evaluate the average E911 processing interval themselves. Furthermore, Pacific argues that the CLECs' overarching concern that updates be processed within 48 hours is misplaced in light of the industry standard that all updates to the E911 system be completed within 48 hours. GTEC also opposes the measure, emphasizing that GTEC currently responds comprehensively to each day's CLEC update submissions with a success/failure report which must be received by the CLEC before further updates can be submitted to GTEC.

The CLECs urge the Commission to require that Pacific/GTEC measure the percentage of direct Gateway updates completed within 48 hours. Yet CLECs have not responded directly to Pacific's and GTEC's arguments that the expense of additional measurements is unwarranted in light of the current reporting systems employed by Pacific and GTEC.

We find that the issue of timely and accurate E-911 updates is more than a competitive issue; it is an important public safety issue. Therefore, we should adopt a measurement standard of parity for service order generated updates and a benchmark of 48 hours for direct gateway input for Pacific and GTEC.

H. COLLOCATION MEASUREMENTS

Measurement 40: Average Time to Respond to a Collocation Request

This measurement captures the average time Pacific/GTEC take to respond to a CLEC's request for collocation. The type of collocation requested is not specified by the parties but, based on their comments, appears to be limited to physical collocation arrangements. We will therefore provide this

clarification in Appendix B. Parties propose two measurements here: (a) the time it takes to provide a space available response (Space Availability); and (b) the time it takes to provide a price and schedule quote (Full Quote).

For a space availability response, Pacific proposes a benchmark of 90% within 15 days. In its January 25, 1999 reply comments, Pacific states the 15 day interval was established by the Commission in D.98-12-068 on December 15, 1998 and therefore, it is too soon to expect it to be able to meet a 100% objective. Pacific agrees with the CLECs to a 30-day interval for Full Quote replies to collocation requests.

GTEC supports the 15 calendar day requirement established in D.98-12-068 as a 95% interim diagnostic benchmark or a proposed 90% benchmark within 10 days. For a Full Quote, GTEC proposes a benchmark of 90% within 30 days or an interim diagnostic benchmark of 95% within 30 days until review in February 2000. It states this is a reasonable proposal in light of the high volume of collocation requests received from CLECs in the last 12 months.

The CLECs propose a benchmark of 100% within 10 days for a space availability response and 100% within 30 days for a Full Quote. They state that collocation is essential for a CLEC to begin providing competing service and, therefore, a timely response is vital. The proposed time intervals are adequate and reasonable given that Pacific and GTEC's administrative processes for handling collocation requests are now well-defined and fully staffed, the demand for collocation space has stabilized, and CLECs are providing forecasts which facilitate Pacific and GTEC's ability to anticipate future demand.

The CLECs object to a standard of less than 100%. They state that nothing in D.98-12-068 suggests that Pacific or GTEC meet their obligations to provide timely responses only some of the time. Even with a 100% benchmark,

some deviation in performance is possible without triggering any performance incentive payments.

We find it reasonable to adopt the 15 calendar day time interval for space availability set in D.98-12-068 as our benchmark and, recognizing the critical importance of collocation to facilities-based CLECs seeking to compete effectively in California's local exchange market, set a 100% standard for the benchmark. Pacific and GTEC have had over six months to staff to meet our adopted timeline.

For a Full Quote, we adopt the 30-calendar day interval recommended by all parties and, for the same reason stated above, find it reasonable for Pacific and GTEC to meet a 100% benchmark.

We recognize that the issue of timely response times to collocation requests is again before the Commission in the Local Competition proceeding, R.95-04-043/I.95-04-044. On April 21, 1999, an ALJ ruling in that proceeding solicited further comments regarding the need to conduct a further inquiry into prospective standards for the incumbent local exchange carriers' provisioning of collocation space to CLECs on a fair and nondiscriminatory basis. In the ALJ's ruling, parties were also directed to specifically identify any collocation issues which may need to be addressed by the Commission in response to the March 31, 1999 FCC Order regarding collocation issues (CC Docket No.98-147). On page 31 of its order, the FCC states "Because of the importance of ensuring timely provisioning of collocation space, we encourage state commissions to ensure that incumbent LECs are given specific time intervals within which they must respond to collocation requests."

Recognizing collocation time intervals may be addressed by the Commission in the Local Competition proceeding, we direct that if any time intervals are adopted in that proceeding for Full Quotes, changed for space

availability, or applied to other forms of collocation (i.e. common, shared, virtual, cageless, adjacent on-site and off-site), these intervals should immediately replace the benchmarks adopted here and be measured at 100% of average response time. Pacific and GTEC should file a compliance filing to incorporate these new requirements.

Measurement 41: Average Time to Provide a Collocation Arrangement

This measures the average time it takes Pacific/GTEC to complete, or build, a collocation arrangement, both for (a) a new arrangement and (b) augmentation of an existing arrangement. As with Measurement 40, the type of collocation arrangement is not specified by the parties but appears to be limited to physical collocation arrangements. Therefore, we will provide this clarification in Appendix B.

Pacific proposes that the appropriate benchmark for new arrangements be set at 90% in 120 days. It states that its tariffs provide for 120 days for most central offices but in some locations the time interval is 150 to 180 days. In support of meeting the average time 90% rather than 100%, Pacific states that the Commission in the 271 decision, D.98-12-069 recognized that the recent collocation workload could preclude Pacific from meeting the stated intervals at all times. For augmentations, Pacific states it is reviewing data and internal standards for provisioning of an augment and hopes to have a proposal on a benchmark to present in the Local Competition proceeding that addresses the shortening of the collocation interval.

GTEC recommends the Commission adopt a 90% commitment to a 90-calendar day response time for both new arrangements and augmentations. GTEC states that its 90% standard is reasonable because with the significant

increase in demand for collocation in the last 12 months, a degree of flexibility is required to manage through peak work loads.

The CLECs propose a benchmark standard of 100% within 90 calendar days for new arrangements and 100% within 60 calendar days for augments. They state that Pacific's claim that 90 calendar days is an unreasonable standard is belied by GTEC's own proposal that it can meet a 90-calendar day interval routinely. They argue that the successful completion of collocation installations is largely a matter of adequately staffing to meet forecasted demand. For augmentation, the process is much simpler, involving the installation of additional cross-connect and facility capacity by the CLEC and Pacific/GTEC.

As in Measurement 40, the Commission recognizes the critical importance of timely providing collocation arrangements. However, we do not find this is the appropriate forum to adopt a performance standard that is stricter than Pacific's current tariffs for provisioning new arrangements. Therefore, we adopt a benchmark for Pacific of 100% compliance with the time intervals set in its tariffs and a benchmark of 90% within 90 days for GTEC. For augmentations, we agree with the CLECs that this is a simpler process than new installations and, therefore, we adopt a benchmark of an average response time of 80 days computed on 100% of the augmentations in the reporting period.

We also direct that if any time intervals for new or augmented collocation installations are adopted in the Local Competition proceeding, these intervals should immediately replace the benchmarks adopted here and be measured at 100% of average response time; Pacific/GTEC should do this by compliance filing.

I. INTERFACE MEASUREMENTS

Measurement 42: Percent of Time Interface is Available

This measurement evaluates the accessibility of Pacific's/GTEC's OSS systems during the time in which they are scheduled to be available. It captures the percentage of scheduled "system available" hours which are in fact available. Accessibility of Pacific/GTEC OSS is fundamental to the ability of the CLECs to do business with Pacific/GTEC. This measurement allows the Commission and the parties to ensure that Pacific/GTEC is providing the CLECs with reliable access to their OSS. The parties have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 43: Average Notification of Interface Outages

This measurement calculates the average time it takes for Pacific/GTEC to notify the CLECs that Pacific's/GTEC's OSS interface is experiencing an outage. Accessibility of Pacific/GTEC OSS is fundamental to the ability of CLECs to do business with Pacific/GTEC. This measurement allows the Commission and the parties to ensure that Pacific/GTEC is providing the CLECs with prompt information as to when access to Pacific's/GTEC's OSS is not possible, so that CLECs may respond efficiently. The parties have agreed to the terms of this measurement as set forth in Appendix B.

Measurement 44: Center Responsiveness

This measurement captures the average time it takes for Pacific's/GTEC's ordering and repair centers to respond to a CLEC call. The measurement allows the Commission and the parties to evaluate the responsiveness of Pacific's/GTEC's work centers, and to ensure that CLEC interface calls are being answered in a timely manner. Efficient interfacing is essential to the CLECs' ability to do business with Pacific/GTEC. The parties

have agreed to the terms and standards of this measurement as set forth in Appendix B.

J. OTHER ISSUES

Issue A: Customer Exclusions

This provision requires Pacific and GTEC to provide CLECs with a detailed description of all occurrences which GTEC/Pacific will consider exclusions for purposes of calculating Provisioning and Maintenance Measures. Additionally, Pacific/GTEC are required to provide CLECs with employees' training documents and supporting methods and procedures, which set forth in detail how Pacific/GTEC employees are to identify excludable occurrences. The parties have agreed to the terms of this provision. We support their agreement because it clarifies how Pacific/GTEC will apply the exclusionary provisions and thereby reduces the likelihood of future conflict over which types of occurrences should fall within the exclusions identified in the Provisioning and Maintenance Measurements.

Issue B: Interconnection Trunks

The provision requires Pacific/GTEC to measure and report on the interval in which CLEC interconnection trunk requests are held due to lack of facilities before being either denied or followed by a firm order confirmation. The information will be supplied to the CLECs for diagnostic purposes only, so that the CLECs can evaluate how often and why their trunk requests are held. The parties have agreed to the terms of this provision. We adopt it as the information sought by the CLECs pertains to services which are vital to the CLECs' ability to provide competitive telephone service.

Issue C: ILEC Affiliate Results

This measurement requires that Pacific/GTEC collect data for its affiliates and report as required by the applicable performance measurements. Pacific/GTEC affiliate data is useful for illuminating areas in which CLECs' access to and interaction with Pacific/GTEC Operations Support Systems can be improved because ILEC affiliate data may reveal aspects of the Pacific/GTEC-affiliate relationship which suggest ways of modifying Pacific/GTEC-CLEC procedure and improving Pacific/GTEC-CLEC system interactions.

Additionally, data quantifying Pacific/GTEC-affiliate interactions can reveal areas in which CLECs are receiving discriminatory service by Pacific/GTEC. Pacific/GTEC affiliate data can be particularly helpful in examining measurements of Pacific/GTEC-CLEC procedures for which there is no obvious analog process within Pacific/GTEC itself.

Both Pacific and GTEC argue that only the Commission should have access to affiliate data. This allows the Commission to determine whether Pacific or GTEC are discriminating in favor of their affiliates while preventing competitors from gaining access to confidential information subject to misuse. GTEC further notes that it is prevented from revealing information required by the OSS performance measurements by the terms of the Interconnection Agreements with its affiliates.

Although there is merit in Pacific's/GTEC's concerns about possible disclosure and misuse of confidential information, we find any potential problem outweighed by the benefit to be gained by Pacific/GTEC providing CLECs with performance measurements for transactions with Pacific/GTEC affiliates.

Allowing interested parties, such as the CLECs, to review affiliate data may substantially increase its usefulness by subjecting it to additional hours of scrutiny. Monitoring performance data is a large task; the assistance of

interested parties may serve to increase its accuracy and augment Commission findings.

Additionally, openness in the OSS measurement and reporting process will enhance self-policing, thereby decreasing the need for sanctions and enforcement proceedings. Similarly, openness will foster confidence in all local exchange companies that service is being provided on a non-discriminatory basis.

However, we find Pacific's and GTEC's concerns about disclosure or misuse of confidential information valid and therefore direct that responsible parties at each CLEC be required to sign appropriate non-disclosure requirements prior to gaining access to affiliate data. The assurances thus provided will be no less than Pacific and GTEC provide to the CLECs before gaining access to confidential CLEC data.

We therefore direct Pacific/GTEC to report performance measurements for transactions with their affiliates as set forth in Appendix B, and to make those data available to all CLECs who have filed non-disclosure documents like those filed by Pacific and GTEC with regard to CLEC data.

GTEC states that its current interconnection agreements (ICAs) with its affiliates prohibit disclosure of the information required to be reported by the measurements in this order. Within 60 days of the effective date of this order, GTEC should attempt in good faith to come to an agreement with its affiliates to modify the terms of those ICAs to allow for the disclosures ordered by the Commission. If it is still unable to provide affiliate data to the CLECs as required, GTEC should notify all parties and file a copy of those ICAs with the Commission, indicating specifically which provisions prevent the disclosures required and why, so that the Commission can take necessary action.

Issue D: Raw Data

The CLECs request that Pacific/GTEC provide all raw data that goes into the calculation of the performance results, including the associated Purchase Order Numbers, on a monthly basis. CLECs and Pacific/GTEC use Purchase Order Numbers to track the activities specific to any given CLEC order. CLECs request access to raw performance data so that they can compare Pacific's/GTEC's data with their own records, and thereby, track the accuracy of Pacific's/GTEC's reporting.

Pacific agrees to provide the raw data as requested by the CLECs. Pacific should therefore complete the required reprogramming in the timeframe to which it has agreed and henceforward provide the CLECs with raw data, including Purchase Order Numbers, on a monthly basis.

GTEC proposes to provide only the numerator and denominator that go into calculating each performance measurement result, as opposed to the detailed data that result in those measurements, or in the alternative, to provide raw data upon request. We find that the raw data serve an important role by allowing the CLECs to verify that the reported measurements are being calculated correctly. Therefore, we direct that GTEC grant CLECs access to GTEC's raw data, including purchase order numbers. However, we also find GTEC's alternative position reasonable: CLECs should request raw data from GTEC on an as-needed basis and GTEC should respond by producing the requested data within 30 days. CLECs are invited to report on the success of this procedure and recommend modifications to this provision by February 1, 2000.

Issue E: Rejects

This measure addresses the terms under which Pacific and GTEC are to implement procedures for returning rejected Local Service Requests to the CLECs. The CLECs require all rejected Local Service Requests to be returned.

Pacific agrees to return all service requests containing errors and asks that it be given 90 days to begin doing so. The CLECs agree to this timeline, but request that Pacific return only service requests which have been rejected due to a CLEC-caused error, thereby reinforcing Pacific's obligation to correct errors which it has caused. We find the CLECs' request reasonable. Within 30 days of this order Pacific should implement a procedure whereby it returns to CLECs all service requests rejected due to a CLEC-caused error.

GTEC currently has a procedure in place for handling rejects that allows each CLEC to determine which types of service request errors will cause a service request to be returned to the CLEC. The reject arrangement is incorporated into interconnection agreements between the CLECs and GTEC. As such, GTEC points out that changes in the way it handles rejects cannot occur without a written request from each CLEC. CLECs appear not to have taken issue with GTEC's position, as their reply comments state that they consider the matter closed. Therefore, in cases in which a current ICA contains a rejection provision, we agree that the CLEC should notify GTEC in writing of its desire to modify that provision to require GTEC to return all rejections resulting from a CLEC-caused error. For those CLEC-GTEC business arrangements not yet formalized into an interconnection agreement, we direct that GTEC return 100% of all rejections caused by a CLEC error.

ISSUE F: Application of Performance Measures and Associated Issues to Interconnection Agreements

In the January 7, 1999 Joint Motion for Adoption of Partial Settlement Agreement, the settling parties stated their intent to incorporate the terms of the Joint Partial Settlement Agreement (PSA) into their existing and future interconnection agreements for local service. Further, the settling parties

stated they had not reached consensus on how or when the terms of the PSA should be incorporated into their existing and future interconnection agreements for local service. Accordingly, the parties agreed to set forth their proposals on this issue in their January 8, 1999 filing addressing open issues. (Joint Motion, page 7.)

In its filing on open issues, Pacific states that performance measures, any applicable liquidated damages, auditing procedures, review procedures, and any penalties should only take affect once they are incorporated as an integrated package into a CLEC's existing interconnection agreement (ICA) through the parties' negotiation pursuant to Section 251 of the Telecommunications Act of 1996 and subsequent approval by the Commission.[20] Pacific states that the performance measurements and incentives or liquidated damages in its current ICAs were negotiated as a package and it would be wholly inappropriate to permit a CLEC to incorporate the new performance measures into a preexisting ICA with liquidated damage provisions that were tailored to the performance measurements in that ICA.

In addition, Pacific states that until negotiations and approval pursuant to Section 251 occur, the terms and conditions of the existing ICAs are the sole and exclusive terms and conditions between the parties concerning performance measures and remedies.

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[20] Pacific states that while it intends to fully participate in the Commission's continuing proceedings related to performance measures and related procedures, such as the proceeding on penalties or liquidated damages, Pacific reserves its rights to appeal any final Commission decision on these issues. It states the Commission may not unilaterally incorporate any terms into the interconnection agreements.

GTEC states that the terms and conditions of the performance measurements adopted in this proceeding should be constructively incorporated into and supersede all existing provisions relating to performance measures, including, e.g., ILEC and CLEC measures, gap closure plans, and financial incentives related to those measures, which may presently be contained in existing ICAs. It states this is appropriate as these provisions were negotiated into ICAs as a "package." Future ICAs should also be required to incorporate the Commission's adopted provisions. For administrative convenience, existing ICAs should not be physically amended and future ICAs should incorporate the measurements and penalties adopted in this proceeding by reference, with a provision that would automatically incorporate into the ICA Commission-required future amendments to the provisions.

The CLECs strongly disagree that there should be any negotiation or "packaging" of the performance measurements adopted here as a precondition of incorporating them into the ICAs, or that the measurements and penalties adopted by the Commission should be the CLEC's sole and exclusive remedy should Pacific/GTEC fail to meet the performance criteria contained in the contract. To do this would modify terms in the existing ICAs that are totally unrelated to the issue of improving OSS delivery to CLECs and would leave the CLECs with fewer contractual remedies than currently exist in their ICAs. The CLECs state that to adopt the package proposals of Pacific and GTEC would have the Commission violate the due process rights of a contracting party.

The CLECs recommend that the Commission order the immediate incorporation of our adopted performance measures into each and every existing and future ICA. For existing agreements, our adopted performance measurements would replace all corresponding terms; measurements and incentives not addressed here would remain in effect. Discussion with Pacific

and GTEC would need to occur as to how existing penalties could be applied to these performance measurements. The CLECs desire the continued availability of penalties in the interim before incentives are adopted in this docket, but recognize there are difficulties that will need to be explored further.

Finally, the CLECs disagree that the Telecommunications Act of 1996 protects Pacific from being compelled to incorporate the Commission's adopted performance standards and incentives into its ICAs. They state that the Commission has authority to order this under §§ 701 and 709 of the Pub. Util. Code. Further, they assert that Pacific has waived any potential legal objection to the Commission's jurisdiction to modify the terms of ICAs by its prior agreement to incorporate the Commission's adopted 17% resale discount into all of its ICAs. (See D.96-12-034).

Based on the parties' positions, we find the issue of how to incorporate the performance measurements we adopt here into existing ICAs cannot be resolved on this record for two reasons. First, no party presents an acceptable proposal as to how the penalties and remedies in existing ICAs can be fairly applied on an interim basis to the OSS performance measures and standards we adopt here. Second, while all parties recommend that the OSS measurements and related procedures we adopt here should be incorporated into existing and new ICAs, they are unable to agree on how to implement this recommendation and they do not provide an adequate record for us to make this decision. We find the proposal of the CLECs for the Commission to direct all parties to negotiate, on an industry-wide basis, a "model" ICA Appendix, similar to the "OSS Appendix" Pacific requested all CLECs incorporate into existing ICAs, has merit, but we cannot adequately assess the ramifications, both legally and factually, of adopting the proposal. Parties have provided additional comments on this issue in the incentive phase and we will further consider the

matter there, where we will have a complete OSS package of measures, standards, incentives, and associated issues.

While we do not decide the manner in which OSS performance measures, standards, and related issues should be incorporated into existing and future ICAs, this does not preclude parties themselves from negotiating to include the performance measurements in existing and new individual ICAs and we encourage them to do so.

Issue G: CLEC Measures

The parties have agreed to remove discussion and resolution of this issue to the incentive phase of the proceeding.

Issue H: Auditing

In order for the Commission and CLECs to have a reasonable level of comfort as to the accuracy and reliability of the OSS and CLECs' performance measurement data reported by Pacific/GTEC there is an initial need to validate the systems, practices, and procedures that Pacific/GTEC intend to employ to generate the performance measures adopted in this order. Adopting a comprehensive auditing requirement should ensure that these systems, practices, and procedures are appropriately designed to meet the goals and requirements of the Commission. In addition to the initial validation, there is also a need for established processes for independent periodic evaluations of the Pacific/GTEC reporting procedures and reported data. There is also a need for a process in the event that disagreements arise between the CLECs and Pacific/GTEC as to the veracity of the data being reported or the functioning of the performance measurement process.

Consequently, it is important to adopt appropriate procedures that will (1) test the accuracy and veracity of the underlying data used to derive respective performance measures compiled and reported by Pacific/GTEC;

(2) test the construct of the policies, procedures, and programs used to extract the underlying data form the respective systems; and (3) test the internal controls put in place to ensure that the data reported is of reasonable accuracy and meets the underlying goals of the performance measures.

The agreements set forth in the Amended Agreement between the CLECs and Pacific, and the CLECs and GTEC contain many similar elements. All parties agree that an initial audit and certification process be performed to ensure that individual ILEC reporting procedures are sound and that data collection and reporting are timely, accurate, and complete. The parties also support an annual comprehensive audit of the Pacific/GTEC reporting procedures and reportable data. Additionally, parties agree that the CLEC's would have the right to what are referred to as "mini-audits" of individual performance measures during the year. These mini-audits would be employed in instances where one or more CLEC's have reason to believe that the data collected for a measure is flawed or the reporting criteria for the measure is not begin adhered to. We note however, that while there is general agreement between parties on the need for audits, there remain unresolved issues between the CLEC's and GTEC and Pacific.

There is one issue of disagreement between the CLEC's and Pacific: the CLEC's recommendation that the initial performance measurement audit needs to be completed before Pacific may re-file its 271 application. Pacific opposes this requirement. We believe that this proceeding is not the appropriate forum to make policy directives regarding Pacific's 271 application. The assigned ALJ in the 271 docket has issued a ruling soliciting parties comments on this issue. Therefore, we will not consider the CLECs' recommendation in this decision.

There are five open issues between the CLEC's and GTEC. First, the CLEC's take issue with GTEC's position that it will only make the Purchase Order Number for ordering/provisioning available to CLECs as part of quarterly mini-audits instead of on a monthly basis. Second, the CLEC's oppose GTEC's proposal that CLECs pay 50% of the initial audit costs. Third, the CLECs maintain that they should be allowed to participate in the selection of the auditor for the initial audit.

For these three issues, we find the agreement reached between Pacific and the CLECs to have reasonably resolved these matters; we do not find GTEC provides adequate justification for different procedures. Therefore, we direct that on these issues, Appendix B should contain the same requirements for GTEC as those we adopted for Pacific in the Amended Agreement.

The fourth issue in dispute is that the CLEC's do not believe that they should have to pay more than the California portion of GTE's national audit. We believe that it is fair that the CLECs only bear 50% of the cost of the audit of GTEC, and not 50% of the audit costs incurred on a national basis by GTEC's parent company, GTE.

Finally, the CLECs recommend that the Commission adopt the same auditing plan for GTEC as the one agreed to between Pacific and the CLECs. We find it desirable to have essentially the same reporting and auditing requirements for both Pacific and GTEC. The agreement reached between the CLECs and Pacific is more comprehensive and detailed than that reached between the CLECs and GTEC. In comments on the draft decision, the CLECs stated that they had reached agreement with GTEC that there should be two modifications to Pacific's auditing process for GTEC.

a. The first modification is that GTE's Initial Audit may be conducted in two phases. Phase One of the Initial Audit would

include those measures reported prior to the commencement of the Initial Audit. Phase Two of the Initial Audit would commence in January, 2000 and should include all of the additional measurements that were not audited in Phase One.[21]

b. The second modification to the Pacific Bell/CLEC audit proposal is that the mini-audits cannot be requested by the CLEC until the Initial Audit or the Annual Audit has been completed.

Based on the record before us in this proceeding, we order that the auditing plan proposed for Pacific in the Amended Agreement, and modified by the two conditions above, be adopted for GTEC.

IV. Conclusion

The OSS performance measurements, standards, reporting, and auditing requirements we discuss and adopt in Section III are set forth in Appendix B. We adopt Appendix B as it provides a comprehensive framework that should furnish the information necessary for the Commission to ensure that Pacific and GTEC provide the CLECs nondiscriminatory access to OSS functions.

We acknowledge and appreciate the hard work and cooperative efforts of Pacific, GTEC, the CLECs, and our Telecommunications Division staff. Their successful efforts in a lengthy collaborative workshop process resulted in the Amended Agreement that forms the foundation of Appendix B.

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[21] By way of contrast, GTE contends that Phase II should include any additional measurements for which the CLECs are receiving results but which were not audited in Phase One. Any remaining measurements that are reported to the CLECs subsequent to January, 2000 would be audited as part of the next Annual Audit. The CLECs cannot agree to this language, because it has the potential of delaying the Initial Audit for some of the measurements until the year 2001. An Initial Audit, even if in two phases, must occur much more promptly.

This decision does not close the proceeding. The Commission in separate decisions will address adoption of performance incentives for Pacific and GTEC, as well as a proposed Change Management Settlement.

We also anticipate issuing one or more decisions revising Appendix B in the coming year. In Appendix B, we include agreements parties reached in the Amended Agreement to recommend refinements to Measurements 15, 16, 17, 19, 20, 21, 23, 29 and 36 on August 31, 1999. We direct parties to file additional information related to Measurements 1, 2, 3, 6, 35, 37, and 38 by February 1, 2000.[22] On February 16, 2000, we will hold a pre-hearing conference to discuss the schedule and process for reviewing Appendix B; our objective for this review is to refine the measurements and standards we adopt today.

V. Comments on Draft Decision

The draft decision of Administrative Law Judge Walwyn in this matter was mailed to the parties in accordance with Pub. Util. Code Section 311(g) and Rule 77.1 of the Rules of Practice and Procedure. Comments were filed on July 21, 1999, and reply comments were filed on July 28, 1999. Based on the comments received, we have clarified our order in several areas, particularly for Measurements 1 and 2, substantively changed the requirements of Measurements 2, 3, 18, and 41, revised some implementation and filing dates, reinstated Measurement 39, and incorporated an agreement on auditing modifications for GTEC.

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[22] In Measurement 1, we also direct Pacific and CLECs to make a filing by October 1, 1999 and for GTEC to obtain a third party audit within 90 days of the effective date of this order. If necessary, the Commission will issue a separate decision resolving these issues.

Findings of Fact

1. California's two major incumbent local exchange carriers (ILECs) are Pacific Bell (Pacific) and GTE California, Inc. (GTEC).

2. Providing Pacific's and GTEC's (Pacific/GTEC's) competitors, the competitive local exchange carriers (CLECs), nondiscriminatory access to Pacific/GTEC's network ordering systems, known as Operations Support Systems (OSS), allows a CLEC the opportunity to provide its customers the same quality and timeliness of service as that being provided by Pacific/GTEC's retail customer service representatives; this access is critical to affording CLECs a meaningful opportunity to compete in California's local telecommunications market.

3. In Decision (D.) 97-09-113, we recognized that the Commission did not have the detailed information necessary to monitor and oversee Pacific/GTEC's OSS deployment in a manner that would ensure their deployment facilitated, rather than inhibited, the growth of competition in the local market.

4. On October 9, 1997, the Commission initiated this formal rulemaking proceeding and investigation (OIR/OII) as a procedural vehicle to accomplish three goals: (1) to determine reasonable standards of performance for Pacific and GTEC in their OSS; (2) to develop a mechanism that will allow the Commission to monitor improvements in the performance of OSS; and (3) to assess the best and fastest method of ensuring compliance if standards are not met or improvement is not shown.

5. This phase of the proceeding addresses only the first two goals.

6. In our OIR/OII, we recognized that we did not have the necessary measures, standards, and incentives to evaluate whether Pacific/GTEC's OSS comply with the requirements of the Telecommunications Act of 1996 (TA96) and the Federal Communications Commission's (FCC's) implementing rules. In

its August 1996 *Local Competition First Report and Order*, the FCC commented, generally, that ILECs must provide CLECs with access to the pre-ordering, ordering, provisioning, billing, repair, and maintenance OSS sub-functions pursuant to TA96 such that CLECs are able to perform such OSS sub-functions in substantially the same time and manner as the ILECs can for themselves.

7. In the OIR/OII, we proposed a set of interim rules that would allow us to expeditiously implement an OSS monitoring program.

8. Opening comments on the proposed rules were filed by interested parties on November 20, 1997 and reply comments were filed on December 11, 1997.

9. After review of the comments, the assigned Administrative Law Judges (ALJs) and our Telecommunications Division staff, in consultation with the assigned Commissioner, determined that the best way to proceed in developing final OSS performance measurements was to encourage parties to reach consensus through informal technical workshops.

10. A series of workshops and meetings were held beginning in April 1998.

11. On January 7, 1999, a Joint Motion for Adoption of Partial Settlement Agreement was filed by Pacific, GTEC, and the CLECs, together with a Joint Partial Settlement Agreement Re: Performance Measurements.

12. All parties submitted opening comments on the remaining outstanding issues on January 8, 1999 and reply comments on January 25, 1999.

13. No party filed a protest to the proposed settlement.

14. An ALJ ruling directed the settling parties to file an addendum to their January 7, 1999 Agreement that reflected the additional agreements they had reached.

15. On April 30, 1999, an amended Joint Partial Settlement Agreement (Amended Agreement) and an updated matrix reflecting the additional agreements (Performance Matrix) were filed.

16. The Amended Agreement is a comprehensive document that serves as the foundation for Appendix B. Parties include 44 performance measurements (Measurements 1 - 44).

17. The scope of the Amended Agreement provides the comprehensive framework we need to monitor and ensure that Pacific/GTEC provide the CLECs nondiscriminatory access to OSS.

18. Measurement 1 calculates the average time that it takes Pacific/GTEC to respond to pre-order queries.

19. For facilities availability inquiries, parity for Pacific requires that its K1023 process be the appropriate measurable standard. We do not have sufficient information to fully specify all processes and aspects of the facility availability and basic loop characteristics of this measurement.

20. The importance of facility availability information to CLECs' ability to compete necessitates a requirement for GTEC to develop processes for responding to facilities availability inquiries.

21. We find parity can be applied as a measurable standard for Pacific's legacy transaction time. Pacific's K1023 process cannot provide parity by design.

22. GTEC is capable of reporting on an interim basis the overall average response time for pre-order inquiries until it completes the necessary system upgrades that will allow its systems to distinguish between interface and legacy transaction times.

23. GTEC did not address why the CLECs' recommended benchmark for electronically submitted/manually processed pre-order inquiries was unreasonable.

24. For fully electronic orders, an interim benchmark of 10 minutes for Measurement 2 is readily attainable by Pacific. For electronically

submitted/manually processed service orders for Measurement 2, an interim benchmark of 5 hours is readily attainable by Pacific and GTEC.

25. Efficient, rapid order processing is essential to a competitive local telephone market.

26. Measurement 3 raises the same issues as Measurement 2 except that rejects generally do not require as many processes as issuance of a firm order confirmation. We find in the instance of fully electronic processing, the time is substantially the same.

27. Measurements 4 and 5, as proposed in the Amended Agreement, are beneficial as they gauge the efficiency and reliability with which Pacific/GTEC are processing CLEC service orders.

28. Measurement 6 captures the percentage of orders processed for which Pacific/GTEC notify the CLEC by a jeopardy notice that the order will not be completed by the date committed on the Firm Order Confirmation. Jeopardy notices are critical to the CLECs' ability to provide their customers with quality service.

29. Measurements 7 and 8, as proposed in the Amended Agreement, are beneficial as they allow the Commission to ensure that Pacific/GTEC are providing timely completion of CLEC service orders.

30. Measurement 9, as proposed in the Amended Agreement, is beneficial as it tracks the percentage of coordinated orders completed within one hour of the committed order due time.

31. Measurement 10, which calculates the success rate of permanent number portability provisioning is a very important measurement that should be reported by both Pacific and GTEC as soon as possible.

32. Measurements 11 and 12, as proposed in the Amended Agreement, are beneficial because they calculate the percentage of CLEC orders which were not

completed by the due date, and thereby measure both the accuracy of information transmitted on Firm Order Confirmations as well as the timeliness with which Pacific/GTEC are completing CLEC service orders.

33. Measurement 13, as proposed in the Amended Agreement, is beneficial because it allows the Commission and the CLECs to ensure that Pacific/GTEC are allocating sufficient resources to facilities management, and to ensure that facilities problems that prevent service order completion are rapidly remedied.

34. Measurement 14, as proposed in the Amended Agreement, is beneficial because it calculates the timeliness with which held orders are completed.

35. Measurement 15 is an important measurement because it provides the only means of identifying troubles reported by migrating customers. Pacific and the CLECs have reached agreement on all issues. We do not find GTEC's reasons for objecting to the measurement to be persuasive.

36. Measurements 16 and 17, as proposed in the Amended Agreement, are beneficial because they will allow the Commission to ensure that Pacific/GTEC are completing service changeover orders in a non-discriminatory manner.

37. We do not have sufficient evidence to conclude that parity is the appropriate measurable standard for Measurement 18. Therefore, it is reasonable to adopt an interim benchmark and to use a readily attainable standard until more information becomes available. In order to ensure CLECs receive reasonable service, it is necessary for both an electronic and a manual standard to be set for notice of completion of a service order.

38. Measurements 19, 20, 21, 22, and 23, as proposed in the Amended Agreement, provide a comprehensive framework of maintenance measurements.

39. Measurements 24, 25, 26, and 27, as proposed in the Amended Agreement, provide a comprehensive framework of network performance measurements.

40. Measurements 28, 29, 30, 31, 32, 33, and 34, as proposed in the Amended Agreement, provide necessary billing measurement information.

41. We find Measurement 35, Duplicate Billing, to provide too much ambiguity to be useful as it is currently written. However, we agree with the CLECs that duplicate billing could be an impediment to local competition were it to occur at a material rate.

42. Measurement 36, as proposed in the Amended Agreement, is beneficial because it evaluates the accuracy of mechanized bill feeds.

43. Measurements 37 and 38 calculate the timeliness and accuracy of updates to directory assistance/directory listing and Emergency 9-1-1 databases. It is reasonable to exclude GTEC from these measurements if it can establish by independent audit that its systems provide parity by design. It is also reasonable for Pacific to report information on direct gateway updates as a special report until the 9-1-1/Listings Fix-it Team completes its analysis.

44. Measurement 39, E-911 Database Updates, is an important public safety measurement as well as a competitive measurement.

45. For Measurement 40, D.98-12-068 requires Pacific/GTEC to provide a space availability response to a CLEC's request for collocation space in the 15 day time interval.

46. For Measurement 41, Pacific's tariffs set forth to provide a new time requirement for collocation arrangements. Requests to augment existing space, require less time to complete than new arrangements.

47. For Measurements 40 and 41, we recognize that collocation time intervals may be addressed soon by the Commission in the Local Competition proceeding.

48. Measurements 42, 43, and 44, as proposed in the Amended Agreement, provide a comprehensive framework for interface measurements.

49. The provisions for Customer Exclusions, as proposed in the Amended Agreement, are beneficial because they clarify how Pacific/GTEC will apply the exclusionary provisions and thereby reduces the likelihood of future conflict over which types of occurrences are covered.

50. We find the benefits to be gained by Pacific/GTEC providing CLECs with performance measurements for transactions with their affiliates to outweigh the concerns raised by Pacific/GTEC.

51. We find it beneficial for the CLECs to have access to all raw data used in the calculation of the performance measurements.

52. We find it beneficial for Pacific and GTEC to implement a procedure whereby they return to CLECs all service requests rejected due to a CLEC-caused error.

53. In the incentive phase of this proceeding, parties have provided additional comments on the application of performance measures and associated issues to interconnection agreements.

54. A comprehensive auditing plan for Pacific and GTEC is beneficial.

Conclusions of Law

1. By October 1, 1999, Pacific and the CLECs should make a joint recommendation to the Commission fully specifying all processes and aspects of the facility availability and basic loop characteristics portion of Measurement 1. If they cannot reach agreement on a joint recommendation, each should separately file a recommendation with supporting comments.

2. Under Measurement 1, GTEC should:

   a. develop and implement processes to electronically respond to all pre-order inquiries except facilities

availability within two months of the effective date of this order;

b. for facilities availability, GTEC should (a) obtain and complete a third-party audit within 90 days of this order to determine what processes are currently used by GTEC to ascertain facility availability in either the retail or wholesale context; (b) determine, considering the results of the audit, what programming changes are necessary so that GTEC can timely respond to CLEC requests for facilities availability information; and (c) provide a complete description of those changes and timeline for implementation to the Commission by February 1, 2000.

c. obtain and complete a third-party audit of its system within 90 days to (1) determine the availability of processes outside of the ordering process that make information on loop availability or basic loop characteristics available to its retail operations; and (2) verify that CLEC pre-ordering queries are processed as quickly as GTEC's internal retail pre-ordering queries.

d. develop processes consistent with change management rules, as proposed by GTEC and the CLECs, which would allow GTEC to respond promptly to CLEC requests under this measure.

e. submit a proposal for a benchmark for an overall response time by February 1, 2000.

4. Pacific should collect data on pre-ordering interface transaction time under Measurement 1 and file its proposed benchmark levels with the Commission by October 31, 1999.

5. For Measurement 2, we find the CLECs have presented insufficient evidence to support their claim that a parity standard is appropriate. Adopting interim benchmarks for Measurement 2 is reasonable until more data is available for review.

6. For Measurement 2, we should adopt interim benchmark standards as follows:

a. for fully electronic orders an interim benchmark of 20 minutes for both Pacific and GTEC should be adopted;

b. GTEC should have fully electronic order processing procedures in operation as soon as possible but no later than February 1, 2000 that will allow it to meet the 20 minute average response time benchmark;

c. for service order requests electronically submitted and manually processed, a benchmark average response time of 6 hours for both Pacific and GTEC should be adopted;

d. for service order requests manually submitted and manually processed, a benchmark average response time of 12 hours should be adopted;

e. Pacific's and GTEC's held and denied interconnection requests should be reported as a diagnostic measure beginning November, 1999;

f. all parties should present final benchmark proposals for the interim benchmarks and diagnostic measure by February 1, 2000.

7. For Measurement 3, we should adopt interim benchmark standards as follows:

a. for fully electronic orders an interim benchmark of 20 minutes for both Pacific and GTEC should be adopted;

b. GTEC should have fully electronic order processing procedures in operation as soon as possible but no later than February 1, 2000 that will allow it to meet the 20 minute average response time benchmark;

c. for service order requests electronically submitted and manually processed, a benchmark average response time of 5 hours for both Pacific and GTEC should be adopted;

d. for service order requests manually submitted and manually processed, a benchmark average response time of 10 hours should be adopted;

e. all parties should present final benchmark proposals for the interim benchmarks by February 1, 2000.

8. For Measurement 6, we adopt the following:

a. Pacific should begin issuing jeopardy notices by August 1, 1999 and begin reporting according to the terms of this measurement by September 1, 1999;

b. Pacific should work with the CLECs to develop a benchmark proposal during the first four months of reporting. Pacific and the CLECs should present a jointly recommended benchmark or, if no agreement can be reached, separate proposals by February 1, 2000;

c. GTEC should immediately begin the programming changes necessary to enable it to issue within a six-month period the three types of notices contained in Measurement 6. It should file a proposed benchmark within four months of beginning reporting. If programming is interrupted system wide for GTEC in the fourth quarter of 1999 and the above dates cannot be met, the benchmark proposed by Pacific should be used as an interim benchmark.

9. We should adopt Measurement 10 for both Pacific and GTEC. Pacific should begin reporting immediately and GTEC by November 1, 1999.

10. We should adopt Measurement 15 for both Pacific and GTEC. GTEC should immediately begin the programming changes necessary to collect the same or substantially similar data that Pacific has agreed to provide. GTEC should provide by February 1, 2000 a status report on its implementation and a proposal for a standard comparable to Pacific's.

11. We should adopt Measurement 18 for both Pacific and GTEC. For Pacific, we should adopt an interim benchmark for electronically processed completion notices of 20 minutes. GTEC should:

a. immediately implement the programming changes necessary to collect customer migration data at the same level of detail provided by Pacific;

b. if fourth quarter Y2K concerns interfere with the implementation of this requirement, work should continue as soon as internal operational programming resumes; and

c. provide a status report by February 1, 2000, including a proposal for either (a) parity reporting, or (b) a benchmark comparable to that established for Pacific.

12. We should not adopt Measurement 35 in its present form. Parties should further discuss this issue and may present a revised proposal to the Commission by February 1, 2000.

13. For Measurements 37 and 38, GTEC should present certification by an independent auditor to the Commission by February 1, 2000, that its system provides parity by design. If GTEC cannot provide this certification, it should commence reporting on an interim basis under the terms agreed to by Pacific.

14. For Measurement 39, we should adopt a direct gateway update standard of 48 hours.

15. For Measurement 40, we should adopt for Pacific and GTEC an average response time of 100% in 15 days for space availability requests and 100% in 30 days for a Full Quote.

16. For Measurement 41, we should adopt for Pacific an average response time of 100% compliance with the time intervals set in its tariffs for providing new collocation space and 100% in 80 days for requests to augment existing space. For GTEC we should adopt an average response time of 90% compliance within 90 days for new space and 100% in 80 days for augmentation of existing space.

17. For both Measurements 40 and 41, we direct that if any different time intervals or terms are adopted in the Local Competition proceeding, these intervals and terms shall immediately replace the benchmarks adopted here and be measured at 100% of average response time. Pacific and GTEC shall make these changes through a compliance filing.

18. Pacific and GTEC should report performance measurements for transactions with their affiliates to CLECs who have signed standard nondisclosure agreements. To the extent GTEC's current interconnection agreements with its affiliates prohibit disclosure of the information, GTEC

should within 60 days of the effective date of this order attempt in good faith to come to an agreement with its affiliates to modify the terms of the agreements to allow for the disclosures ordered here. If GTEC is still unable to provide the affiliate data to the CLECs, it should notify all parties and file a copy of the agreements with the Commission indicating specifically which provisions prevent the disclosures required, and why.

19. Pacific should provide all raw data that goes into the calculation of the performance results, including the associated Purchase Order Numbers, to CLECs on a monthly basis. GTEC should grant CLECs access to the same raw data within 30 days of a CLEC request.

20. Pacific should implement a procedure within 30 days of this order whereby it returns to CLECs all service requests rejected due to a CLEC-caused error. GTEC should implement the same procedure within 90 days unless its interconnection agreement with a CLEC provides for a different procedure. If a CLEC's interconnection agreement provides for a different procedure, it should notify GTEC in writing of its desire to modify that provision to require GTEC to return all rejections resulting from a CLEC-caused error.

21. We should further consider the issue of incorporating performance measures, standards, incentives, and related issues into existing interconnection agreements in the incentive phase of this proceeding.

22. We should adopt the same auditing procedures for GTEC as those proposed for Pacific in the Amended Agreement, modified by the following two conditions;

a. The first modification is that GTE's Initial Audit may be conducted in two phases. Phase One of the Initial Audit would include those measures reported prior to the commencement of the Initial Audit. Phase Two of the Initial Audit would

commence in January, 2000 and should include all of the additional measurements that were not audited in Phase One.

b. The second modification to the Pacific Bell/CLEC audit proposal is that the mini-audits cannot be requested by the CLEC until the Initial Audit or the Annual Audit has been completed.

23. The Amended Agreement meets the "all party" settlement criteria set forth in D.92-12-019, is reasonable in light of the whole record, consistent with law, and in the public interest. Therefore, we should adopt it.

24. We should adopt the OSS performance measures, standards, and auditing, reporting, implementation, and review procedures set forth in Appendix B.

ORDER

IT IS ORDERED that:

1. We adopt the Operations Support Systems performance measurements, standards, and auditing, reporting, implementation, and review procedures contained at Appendix B for Pacific Bell (Pacific) and GTE California, Inc. (GTEC).

2. Within 30 days of the effective date of this order, Pacific, GTEC, and the competitive local exchange carriers (CLECs), shall file by motion a conforming Appendix B that incorporates the changes to the Amended Agreement ordered herein.

3. Pacific and GTEC shall provide Appendix B performance reports directly to the Director, Telecommunications Division. The refinements to Measurements 15, 16, 17, 19, 20, 21, 23, 29 and 36 that parties in the amended agreement agreed to provide shall be filed by motion with our Docket Office. Likewise, Pacific's October 1, 1999 filing requirement and GTEC's audit filing requirement under

Measurement 1, as well as all February 1, 2000 filing requirements under Measurements 1, 2, 3, 6, 35, 37, and 38 shall be filed by motion with our docket office.

4. A prehearing conference to discuss the schedule and process for reviewing Appendix B is set for 10:00 a.m., on February 16, 2000, in the Commission's hearing rooms, at 505 Van Ness Avenue, San Francisco, California.

This order is effective today.

Dated August 5, 1999, at San Francisco, California.

RICHARD A. BILAS
President
HENRY M. DUQUE
JOSIAH L. NEEPER
JOEL Z. HYATT
CARL W. WOOD
Commissioners

APPENDIX A APPEARANCE LIST

APPENDIX A

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Last updated on 25-JUN-1999 by: SMJ
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(END OF APPENDIX A)

APPENDIX B

ADOPTED CALIFORNIA OSS OII PERFORMANCE MEASUREMENTS FOR PACIFIC BELL AND GTE CALIFORNIA, INC. (R.97-10-016/I.97-10-017)

TABLE OF CONTENTS

Title

I. Description of Major OSS Categories

Measurements developed to help assess the provision of non-discriminatory access to OSS and other services, elements, or functions were combined into the following broad categories:

- **Pre-Ordering**
  Pre-ordering activities relate to the exchange of information between the ILEC and the CLEC regarding current or proposed customer products and services, or any other information required to initiate ordering of service. Pre-ordering encompasses the critical information needed to submit a provisioning order from the CLEC to the ILEC. The pre-order measurement reports the timeliness with which pre-order inquiries are returned to CLECs by the ILEC. Pre-ordering query types include:

    - Address Verification/Dispatch Required
    - Request for Telephone Number
    - Request for Customer Service Record
    - Service Availability
    - Service Appointment Scheduling (due date)
    - Rejected/Failed Inquiries
    - Facility Availability

- **Ordering**
  Ordering activities include the exchange of information between the ILEC and the CLEC regarding requests for service. Ordering includes: (1) the submittal of the service request from the CLEC, (2) rejection of any service request with errors and (3) confirmation that a valid service request has been received and a due date for the request assigned. Ordering performance measurements report on the timeliness with

which these various activities are completed by the ILEC. Also captured within this category is reporting on the number of CLEC service requests that automatically generate a service order in the ILECs' service order creation system.

- **Provisioning**
  Provisioning is the set of activities required to install, change, or disconnect a customer's service. It includes the functions to establish or condition physical facilities as well as the completion of any required software translations to define the feature functionality of the service. Provisioning also involves communication between the CLEC and the ILEC on the status of a service order, including any delay in meeting the commitment date and the time at which actual completion of service installation has occurred. Measurements in this category evaluate the quality of service installations, the efficiency of the installation process, and the timeliness of notifications to the CLEC that installation is completed or has been delayed.
- **Maintenance**
  Maintenance involves the repair and restoral of customer service. Maintenance functions include the exchange of information between the ILEC and CLEC related to service repair requests, the processing of trouble ticket requests by the ILEC, actual service restoral and tracking of maintenance history. Maintenance measures track the timeliness with which trouble requests are handled by the ILEC and the effectiveness and quality of the service restoral process.
- **Network Performance**
  Network performance involves the level at which the ILEC provides services and facilitates call processing within its network. The ILEC

also has the responsibility to complete network upgrades efficiently. If network outages do occur, the ILEC needs to provide notification so appropriate network management and customer notification can occur by CLECs. Network performance is evaluated on the quality of interconnection, the timeliness of notification of network outages, and the timeliness of network upgrades (code openings) the ILEC completes on behalf of the CLEC.

- **Billing**
  Billing involves the exchange of information necessary for CLECs to bill their customers, to process the end user's claims and adjustments, to verify the ILEC's bill for services provided to the CLEC and to allow CLECs to bill for access. Billing measures have been designed to gauge the quality, timeliness, and overall effectiveness of the ILEC billing processes associated with CLEC customers.
- **Collocation**
  ILECs are required to provide to CLECs available space as required by law to allow the installation of CLEC equipment. Performance measures in this category assess the timeliness with which the ILEC handles the CLEC's request for collocation as well as how timely the collocation arrangement is provided.
- **Data Base Updates**
  Database updates for directory assistance/listings and E911 include the processes by which these systems are updated with customer information which has changed due to the service provisioning activity. Measurements in this category are designed to evaluate the timeliness and accuracy with which changes to customer information, as submitted to these databases, are completed by the ILEC.

- **Interfaces**

  ILECs provide the CLECs with choices for access to OSS pre-ordering, ordering, maintenance, and repair systems. Availability of the interfaces is fundamental to the CLEC being able to effectively do business with the ILEC. Additionally, in many instances, CLEC personnel must work with the service personnel of the ILEC. Measurements in this category assess the availability to the CLECs of systems and personnel at the ILEC work centers.

OSS OII Performance Measurements
Report Requirements

Pre-Ordering — Measure 1

Title: Average Response Time (to Pre-Order Queries)

Area	*Requirement Description*
Description:	The response interval for each pre-ordering query is determined by computing the elapsed time from the ILEC receipt of the query from the CLEC, whether or not syntactically correct, to the time the ILEC returns the requested data to the CLEC. • Address Verification/Dispatch Required • Request for Telephone Number • Request for Customer Service Record • Service Availability • Service Appointment Scheduling (due date) • Rejected/Failed inquires • Facility Availability
Method of Calculation:	**Mechanized:** OSS Interface Transaction Time (GTE only) Sum ((Query Response Date and Time) – (Query Submission Date and Time)) / (Number of Queries Submitted in Reporting Period) OSS Interface Transaction Time (Pacific Bell Only) Sum ((Query Submission Date and Time to Legacy System Access) – (Query Submission Date and Time to OSS Interface) + (Query Response Date and Time to CLEC) – (Query Response Date and Time from Legacy System Access)) / (Number of Queries Submitted in Reporting Period) Legacy System Transaction Time (Pacific Bell and GTE) Sum ((Query Response Date and Time from Legacy System) – (Query Submission Date and Time to Legacy System)) / (Number of Queries Submitted in Reporting Period) **Manual: (Pacific Bell and GTE – CSRs only)** ~~Sum ((Fax Date and Time Returned) – (Business Date and Time of receipt of valid fax service request)) / (Number of Faxes Submitted in Reporting Period)~~ (# of CSR's Returned within "X" Business Hours) / (# of CSRs Returned) x 100
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate, by ILEC (if analog applies) and ILEC affiliate
Reported By:	By query type and by interface type, including fax
Geographic Level:	Statewide

Measurable Standard:	**Pacific Bell and GTE:** **Mechanized:** ~~**(Issue still to be resolved)**~~ **Manual CSRs:** **Pacific Bell:** • Standard - 95% in 4 hours ~~(Pacific Bell)~~ ~~**GTE:**~~ ~~Standard - (GTE)~~ ~~• Electronically Received: Standard - (Benchmark level still to be resolved)~~ ~~• Fully Manual: Standard - 95% in 24 hours~~
Business Rules:	• Elapsed time is measured in seconds.
Notes:	~~• Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • GTE does not have the ability to report by query type until ~~EDI~~ EDI/CORBA is implemented (planned for 3rd Quarter 1999).

Pre-Ordering

Measure 1

Title: Average Response Time (To Pre-Order Queries)

Under Method of Calculation, add:

Manual:
(Pacific Bell and GTEC--facilities availability only)
Measure all procedures for determining loop availability and characteristics

(Pacific Bell --facilities availability only)
Measure K1023 process

Under "Measurable Standards" add:

Mechanized
Pacific:

- Interface Transaction Time: File proposed interface transaction time benchmark with the Commission by October 31, 1999;
- Legacy System Time: parity.

GTEC:

- Overall Response Time: report diagnostically for five months, propose benchmark by February 1, 2000;

Manual CSRs:
Pacific and GTE:

- Standard - 95% in 4 hours

Manual: facilities availability inquiries

- Standard - parity

Manual: K1023 process (Pacific only)

- Standard – parity

GTEC:

- Electronically received: 95% in 4 hours
- Fully manual: 95% in 24 hours

Under "Notes" add:

Pacific/GTEC shall:

- Submit information to the Commission within two months of the effective date of this order fully defining all processes employed to determine facility availability and basic loop characteristics.

GTEC shall:

- Develop and implement processes to electronically respond to all pre-order queries except facilities availability inquiries. Those processes should be consistent with change management rules and be completed within two months of the effective date of this decision. Procedures for responding to facilities availability requests should be developed and a complete description of proposed changes and a timeline for implementation submitted by February 1, 2000.
- Obtain a third-party audit within ninety days of the effective date of this decision to determine the availability of processes outside of the ordering process that make information on facility availability or basic loop characteristics available to its retail operations. For processes available for ascertaining any facility availability information using GTEC's Local Service Request service order inquiry process, an initial audit should verify whether this process provides facility availability information in a manner that is "parity by design"
- Obtain and complete a third-party audit of its system within ninety days of the effective date of this decision to verify that CLEC pre-ordering queries are processed as quickly as GTEC's internal retail pre-ordering queries.

OSS OII Performance Measurements
Report Requirements

Ordering — Measure 2

Title: Average FOC/LSC Notice Interval

Area	*Requirement Description*
Description:	Measures the average time from receipt of a service request to returning a Firm Order Confirmation (FOC)/Local Service Confirmation (LSC).
Method of Calculation:	**Mechanized:** Sum ((Date and Time of FOC/LSC) - (Business Date and Time of Receipt of Valid Service Request)) / (Number of FOCs/LSCs Sent in Reporting Period) **Manual:** Sum ((Fax Date and Time Returned) - (Business Date and Time receipt of valid fax service request)) / (Number of Faxes Submitted in Reporting period) **Held and Denied Interconnection Trunk Requests:** Sum (Date Request is Released) – (Date Request is Originally Received) / (Number of Requests Held and Released)
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate, by ILEC (if analog applies) and ILEC affiliates.
Reported By:	• Electronically received/electronically handled • Electronically received and manually handled • Manually received and manually handled • By service group type • Pacific Bell will report Interconnection trunks by New and Augment • ~~SQT for flow through orders~~
Geographic Level:	Statewide

Measurable Standard:	~~**Pacific Bell and GTE:**~~ Fully Electronic/Flow Through ~~(Issue still to be resolved)~~ ~~**Pacific Bell and GTE:**~~ Electronically Received/Manually Handled ~~**(Benchmark Level still to be resolved)**~~ Manually received/Manually Handled ~~**(Benchmark level still to be resolved)**~~ **Pacific Bell:** **GTE:** Interconnection Trunks Interconnection Trunks Standard – Average 7 days (New) Standard - Average 5 day Average 4 days (Augment) **Interconnection Trunk Requests:** **Held and Denied – Average Interval (reported as diagnostic result)** ~~**Pacific Bell and GTE:**~~ ~~*The standards below are interim and subject to review in February, 2000.*~~ ~~Electronically Received/Manually Handled (Issue still subject to resolution)~~ ~~Manually Received/Manually Handled (Issue still subject to resolution)~~
Business Rules:	• ~~Elapsed time calculated in hours.~~ • The start time of requests received after the end of the business day will be t beginning of the next business day. Business day is defined as published ho of operation for the ILEC ordering center. • Business day = Monday through Friday, excluding weekends and ILEC published holidays (PB) • Business day = Monday through Saturday, excluding Sundays and ILEC published holidays (GTE). • Excludes non-business days.
Notes:	• Incorporation of the results for Projects is currently under study by the ILEC Parties have agreed to study projects for "up to 50 lines". • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • GTE will report Average Interval for Interconnection Trunk Requests – Held and Denied, no later than November 1999.

Ordering Measure 2

Title: Average FOC/LSC Notice Interval

Under "Measurable Standards" add:

Fully Electronic/Flow Through: 20 minutes
Electronically Received/Manually Handled: 6 hours
Manually received/Manually Handled: 12 hours

Under "Notes" add:

- GTE shall develop and implement a fully-electronic order processing procedure as soon as possible but no later than February 1, 2000 to meet the above benchmark for electronically-transmitted/electronically-processed service requests .
- All benchmarks adopted are interim: the parties should collect data and submit proposed modifications of the adopted measurable standards by February 1, 2000;
- Pacific and GTEC shall report the average time to release held and denied interconnection trunk requests as a diagnostic measure beginning in November, 1999 and submit proposed permanent standards by February 1, 2000.

OSS OII Performance Measurements
Report Requirements

Ordering — Measure 3

Title: Average Reject Notice Interval

Area	*Requirement Description*
Description:	Reject interval is the elapsed time between the ILEC receipt of an order from the CLEC to the ILEC return of a notice of a rejection to the CLEC.
Method of Calculation:	**Mechanized** Sum ((Business Date and Time of ILEC Transmission of Order Rejection) - (Business Date and Time of Order Receipt)) / (# of Orders Rejected) **Manual** Sum ((Fax Date and Time Returned) - (Business Date and Time Receipt of valid fax service request)) / (Number of Faxes Submitted in reporting Period)
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies) and ILEC Affiliates

Reported By:	• Electronically received, electronically handled
	  • All interfaces
	  • Syntax(edit engine) and content errors (other edits)
	  • Resale orders and Facility based/UNE orders
	  • ~~SOT (Issue still to be resolved)~~
	• Electronically received, manually handled
	  • All interfaces
	  • Syntax (edit engine) and content errors (other edits)
	  • Resale orders and Facility based/UNE orders
	  • ~~SOT (Issue still to be resolved)~~
	• Manually received and handled (fax)
	  • Resale orders and Facility based/UNE orders
	  • ~~SOT (Issue still to be resolved)~~

Geographic Level:	Statewide
Measurable Standard:	~~(Issue still to be resolved)~~
Business Rules:	• ~~Elapsed time calculated in hours.~~ • Calculation of requests received after the end of the business day starts at the beginning of the next business day. Business day is defined as published hours of operation for the ILEC. • Business day = Monday through Friday, excluding weekends and ILEC published holidays (PB). • Business day = Monday through Saturday, excluding Sundays and ILEC published holidays (GTE) • Excludes non-business days
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Ordering Measure 3

Title: Average Reject Notice Interval

Under "Measurable Standards" add:

Fully Electronic/Flow Through: 20 minutes
Electronically Received/Manually Handled: 5 hours
Manually received/Manually Handled: 10 hours

Under "Notes" add:

- All benchmarks adopted are interim: the parties should collect data and submit proposed modifications of the adopted measurable standards by February 1, 2000;
- GTEC shall develop and implement a fully electronic order processing procedure as soon as possible but no later than February 1, 2000 to meet the benchmarks set forth in this measure.

OSS OII Performance Measurements
Report Requirements

Ordering — Measure 4

Title: Percentage of Flow-Through Orders

Area	*Requirement Description*
Description:	Measures the percentage of mechanized service requests processed on a flow through basis.
Method of Calculation:	[(Number of valid mechanized orders that flow-through without manual intervention) / (Total valid mechanized service requests)] x 100
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate, and ILEC Affiliates
Reported By:	• All electronic interfaces • SGT/SOT (including PNP) limited to those currently programmed to flow-through • SGT/SOT aggregate data includes all service group/service order combinations received electronically.
Geographic Level:	Statewide
Measurable Standard:	~~**The process to evaluate performance on this measure is under development. Issues, if any, are not yet finally defined. Final resolution depends on completed development of an agreed to Flow-Through Plan.**~~ **Issue of how to evaluate performance will be reconsidered in February 2000.**
Business Rules:	
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 5**

Title: Percentage of Orders Jeopardized

Area	***Requirement Description***
Description:	Percentage of total orders processed for which the ILEC notifies the CLEC that the work will not be completed as committed on the original FOC.
Method of Calculation:	(Number of Orders Jeopardized) / (Number of Orders Confirmed) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies)and ILEC Affiliates
Reported By:	• By electronic interface • By service group type • By lack of facilities and all other
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** 2/4w (8db) analog loop (incl. Coin/analog PBX) — POTS - Business (fielded) — B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop — POTS - Business (Assured) — Dispatch Designed Services 2w digital loop(ISDN capable) — ISDN(BRI) — Dispatch Designed Services 2w digital loop(xDSL capable) — ADSL — Dispatch Designed Services 4w digital loop (1.544Mbps capable/HDSL) — ISDN(PRI)/DS1 — Dispatch Designed Services UNE Port–Basic Analog/Coin — POTS - Business (fielded) — CentraNet-Simple UNE Port–CENTREX — CENTREX — CentraNet -Complex UNE Port–ISDN (BRI) — CENTREX — CentraNet -Complex UNE Port–DS1/ISDN-PRI (incl. DS1 line port) — DS1/ISDN(PRI) — CentraNet -Complex UNE Port–PBX DID — PBX DID — CentraNet -Complex UNE Dedicated Transport (incl.DS1 and DS3) — HICAP — HICAP Designed UNE Platform (PB only — Analogous Retail Service — N/A **Interconnection Trunks** — ILEC Dedicated Trunks — ILEC Dedicated Trunks
Business Rules:	• Excludes delays for customer reasons.
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • CLECs/ILECs agree to postpone implementation of this measure until process is mechanized. (P*B - end of 2nd quarter 1999). • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog.

OSS OII Performance Measurements Report Requirements

Provisioning — Measure 6

Title: Average Jeopardy Notice Interval - Pacific Bell

Area	*Requirement Description*
Description:	Measures the remaining time between the pre-existing committed order completion date and time (communicated via the FOC) and the date and time the ILEC issues a notice to the CLEC indicating an order is in jeopardy of missing the due date (or the due date/time has been missed).
Method of Calculation:	Assignment: *Jeopardies identified during assignment* Sum ((Date of Committed Due Date for the Order) - (Date of Jeopardy Notice)) / (Number of Order Jeopardized) Installation: *Jeopardies identified during installation prior to due time* Sum ((Date & Time of Committed Due Date for the Order) - (Date & Time of Jeopardy Notice)) / (Number of Installation Jeopardy Notices) *Notification of Missed Commitments* Sum(Due Date and Time of Missed Commit Notice - Due Date and Time of Order) / (Number of Missed Commit Notices)
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate, and ILEC Affiliates
Reported By:	• By electronic interface • By service group type • By lack of facilities and all other
Geographic Level:	Statewide
Measurable Standard:	~~(Issue still to be resolved)~~
Business Rules:	• Excludes delays for customer reasons.
Notes:	• Availability of ILEC Affiliate data for review will be determined by the CPUC. • If the ILECs' policy changes regarding jeopardy notices to their Retail customers, this measure should be evaluated for analog. • ~~CLECs/ILECs agree to postpone implementation of this measure until process is mechanized. (P*B - end of 2nd quarter 1999)~~

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 6a**

Title: Average Jeopardy Notice Interval - **GTE**

Area	***Requirement Description***
Description:	Measures the remaining time between the pre-existing committed order completion date and time (communicated via the FOC) and the date and time the ILEC issues a notice to the CLEC indicating an order is in jeopardy of missing the due date (or the due date/time has been missed). ***(GTE does not support this measure)***
Method of Calculation:	
Report Period:	
Report Structure:	
Reported By:	
Geographic Level:	
Measurable Standard:	
Business Rules:	
Notes:	

Provisioning

Change title to:

Average Jeopardy Notice Interval - Pacific Bell and GTEC

Under "Measurable Standards" add:

Pacific shall:

- Beginning September 1999, work together with the CLECs to develop a benchmark proposal within a four month period; and
- Jointly recommend a benchmark standard to the Commission by February 1, 2000. If a recommended benchmark standard cannot be agreed to and submitted by that date, a benchmark proposal for comment should be filed by Pacific during the February 1, 2000 proceedings.

GTEC shall:

- Begin reporting the measurement and commence the collection of data at the end of the six month programming period to develop a proposed benchmark standard; and
- File the proposed benchmark with the Commission within four months of beginning to report the measure.

Under "Notes" add:

Pacific shall:

- Complete the programming of its system within 60 days of the adoption of this order;
- Begin issuing jeopardy notices by August 1, 1999;
- Begin reporting according to the terms of this measurement by September 1, 1999;

GTEC shall:

- Begin the programming changes necessary to issue the three categories of notices discussed under this measure;
- Begin issuing jeopardy notices within six months following the date of this order. If fourth quarter Y2K concerns interfere with this requirement, work shall continue as soon as internal operational programming is resumed.

OSS OII Performance Measurements
Report Requirements

Provisioning — Measure 7

Title: Average Completed Interval

Area	*Requirement Description*
Description:	Average business days from receipt of valid, error-free service request to completion date in service order system for new, move, and change orders.
Method of Calculation:	Total business days from receipt of valid, error-free service request to completion date in service order system for new, move and change orders / Total new, move and change orders
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and ILEC Affiliates
Reported By:	By service group type and field work/no field work where applicable.
Geographic Level:	Region (PB), Statewide (GTE)
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE.** **Parity for UNE measured for the following UNEs:** — **Pacific Bell Retail** — **GTE Retail** 2/4w (8db) analog loop (incl. Coin/analog PBX) — POTS - Business (fielded) — B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop — POTS - Business (Assured) — Dispatch Designed Services 2w digital loop(ISDN capable) — ISDN(BRI) — Dispatch Designed Services 2w digital loop(xDSL capable) — ADSL — Dispatch Designed Services 4w digital loop (1.544Mbps capable/HDSL) — ISDN(PRI)/DS1 — Dispatch Designed Services UNE Port–Basic Analog/Coin — POTS - Business (fielded) — CentraNet-Simple UNE Port–CENTREX — CENTREX — CentraNet -Complex UNE Port–ISDN (BRI) — CENTREX — CentraNet -Complex UNE Port–DS1/ISDN-PRI (incl. DS1 line port) — DS1/ISDN(PRI) — CentraNet -Complex UNE Port–PBX DID — PBX DID — CentraNet -Complex UNE Dedicated Transport (incl.DS1 and DS3) — HICAP — HICAP Designed UNE Platform (PB only) — Analogous Retail Service — N/A **Interconnection Trunks** — ILEC Dedicated Trunks — ILEC Dedicated Trunks
Business Rules:	• Excludes customer requested due dates beyond interval offered, and orders delayed for customer reasons.
Notes:	• Incorporation of the results for Projects is currently under study by the ILECs. Parties have agreed to study projects for "up to 50 lines". • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog. • Currently, Pacific can not differentiate between residential and business 2-wire (8db) Therefore, the Measurable Standard for such loops is POTS-Business.

OSS OII Performance Measurements
Report Requirements

Provisioning — Measure 8

Title: Percent Completed Within Standard Interval

Area	*Requirement Description*
Description:	Measures of orders completed within the standard interval of receipt of valid, error-free service request.
Method of Calculation:	Sum (Total New, Move and Change Orders Completed Within the Standard Interval of Receipt of Valid, Error-free Service Request) / (Total New, Move and Change Orders)
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and ILEC Affiliates
Reported By:	By service group type excluding services with flexible due dates.
Geographic Level:	Region (PB), Statewide (GTE)
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE.** **Parity for UNE measured for the following UNEs:**

	Pacific Bell Retail	**GTE Retail**
2/4w (5.5 db) assured analog loop	POTS - Business (Assured)	Dispatch Designed Services
2w digital loop(ISDN capable)	ISDN(BRI)	Dispatch Designed Services
2w digital loop(xDSL capable)	ADSL	Dispatch Designed Services
4w digital loop (1.544Mbps capable/HDSL)	ISDN(PRI)/DS1	Dispatch Designed Services
UNE Port–Basic Analog/Coin	POTS - Business (fielded)	CentraNet -Simple
UNE Port–CENTREX	CENTREX	CentraNet -Complex
UNE Port–ISDN (BRI)	CENTREX	CentraNet -Complex
UNE Port–DS1/ISDN-PRI (incl. DS1 line port)	DS1/ISDN(PRI)	CentraNet -Complex
UNE Port–PBX DID	PBX DID	CentraNet -Complex
UNE Dedicated Transport (incl. DS1 and DS3)	HICAP	HICAP Designed
UNE Platform (PB only)	Analogous Retail Service	N/A
Interconnection Trunks	ILEC Dedicated Trunks	ILEC Dedicated Trunks

Business Rules:	• Excludes customer requested due dates greater than the standard interval, and orders delayed for customer reasons. • Excludes services with flexible due date i.e., Basic Exchange services/POTS (PB), and B1/R1 Service (GTE)
Notes:	• Incorporation of the results for Projects is currently under study by the ILECs. Parties have agreed to study projects for "up to 50 lines". • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog.

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 9**

Title: Coordinated Customer Conversion as a Percentage On-Time

Area	***Requirement Description***
Description:	Measures the percentage of coordinated orders (TBCC/CHC) completed on time* for all orders where CLEC has requested coordination (including PNP). * *Note: "On time" means within one hour of committed order due time*
Method of Calculation:	((Number of coordinated orders completed by due date and time) / (Count of coordinated orders completed in reporting period)) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), by ILEC Affiliates
Reported By:	Residence and Business conversions, including PNP
Geographic Level:	Statewide
Measurable Standard:	**Parity for Pacific Bell and GTE~~, except for PNP~~:** **Pacific Bell Retail** / **GTE Retail** **Coor. Conversions (Res.)** — Coor. Conv. -Res / Coor. Conv. -Res **Coor. Conversions (Bus.)** — Coor. Conv. -Bus / Coor. Conv. -Bus **Coor. Conversions (PNP-Port Out)** — Coor. Conv. - (PNP-Port In/Back) / Coor. Conv. -(PNP-Port In/Back)
Business Rules:	• Excludes CLEC caused misses • Applies to CLEC requested coordinated orders only (including Number Portability orders where coordination is requested by the CLEC).
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 10**

Title: PNP Network Provisioning

Area	***Requirement Description***
Description:	Measures PNP network provisioning failures as a percentage of the total number of NPAC broadcasts of telephone number subscription versions to port. ~~(No agreement has reached among parties on this measure at this time.)~~
Method of Calculation:	(Total number of PNP network provisioning failures / Total number of NPAC porting broadcasts) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and ILEC Affiliates
Reported By:	
Geographic Level:	Statewide
Measurable Standard:	**Parity for Pacific Bell and GTE**

Business Rules:	• Provisioning failure data will be collected at two points in the provisioning process:
	  • Partial failures of NPAC broadcasts to reach and be processed by the ILEC LSMS
	  • Individual network database failures - failures to provision between the ILEC LSMS and PNP network databases (STP or SCP)
	• Excludes total failures from the NPAC to *all* LSMS systems.
	• Excludes broadcasts failing due to a lack of GTT information made available to ILEC (no SS7 signaling agreement in place between ILEC and CLEC)

Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Provisioning

Measure 10

Title: PNP Network Provisioning

Delete: "No agreement has been reached among the parties at this time."

Under Measurable Standards, add:

- GTEC shall begin reporting by November 1, 1999.

OSS OII Performance Measurements Report Requirements

Provisioning — Measure 11

Title: Percent of Due Dates Missed

Area	*Requirement Description*
Description:	Measures the percent of new, move and change orders where installation was not completed by the due date.
Method of Calculation:	(Total Number of Missed Due Dates Due to ILEC Reasons for New, Move and Change Orders / Total Number of New, Move and Change Orders) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Reported By:	By service group type and Field Work/No Field Work as appropriate
Geographic Level:	Region (PB), Statewide (GTE)
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** 2/4w (8db) analog loop (incl. Coin/analog PBX) — POTS - Business (fielded) — B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop — POTS - Business (Assured) — Dispatch Designed Services 2w digital loop(ISDN capable) — ISDN(BRI) — Dispatch Designed Services 2w digital loop(xDSL capable) — ADSL — Dispatch Designed Services 4w digital loop (1.544Mbps capable/HDSL) — ISDN(PRI)/DS1 — Dispatch Designed Services UNE Port–Basic Analog/Coin — POTS - Business (fielded) — CentraNet -Simple UNE Port–CENTREX — CENTREX — CentraNet -Complex UNE Port–ISDN (BRI) — CENTREX — CentraNet -Complex UNE Port–DS1/ISDN-PRI (incl. DS1 line port) — DS1/ISDN(PRI) — CentraNet -Complex UNE Port–PBX DID — PBX DID — CentraNet -Complex UNE Dedicated Transport (incl.DS1 and DS3) — HICAP — HICAP Designed UNE Platform (PB only) — Analogous Retail Service — N/A **Interconnection Trunks** — ILEC Dedicated Trunks — ILEC Dedicated Trunks
Business Rules:	• Excludes customer misses • Due date is defined as either original due date or final due date if the original due date was missed due to customer reasons.
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Missed Appointment reason codes as diagnostic data. • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog..

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 12**

Title: Percent of Due Dates Missed Due to Lack of Facilities

Area	***Requirement Description***
Description:	Measures the percent of new, move and change orders missed due to lack of facilities. Note: Results also included in Measure "Percent Missed Due Dates"
Method of Calculation:	((Total New, Move and Change Orders Missed Due Dates Due to Lack of Facilities) / (Total Number of New, Move and Change Orders)) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Reported By:	By service group type and Field Work/No Field Work as appropriate
Geographic Level:	Region (PB), Statewide (GTE)
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** / **Pacific Bell Retail** / **GTE Retail** 2/4w (8db) analog loop (incl. Coin/analog PBX) / POTS - Business (fielded) / B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop / POTS - Business (Assured) / Dispatch Designed Services 2w digital loop(ISDN capable) / ISDN(BRI) / Dispatch Designed Services 2w digital loop(xDSL capable) / ADSL / Dispatch Designed Services 4w digital loop (1.544Mbps capable/HDSL) / ISDN(PRI)/DS1 / Dispatch Designed Services UNE Dedicated Transport (incl. DS1 and DS3) / HICAP / HICAP Designed UNE Platform (PB only) / Analogous Retail Service / N/A **Interconnection Trunks** / ILEC Dedicated Trunks / ILEC Dedicated Trunks
Business Rules:	• Due date is defined as either original due date or final due date if the original due date was missed due to customer reasons.
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog.

OSS OII Performance Measurements Report Requirements

Provisioning — Measure 13

Title: Delay Order Interval to Completion Date (For Lack of Facilities)

Area	*Requirement Description*
Description:	Measures the average calendar days from due date to completion date on company missed orders due to lack of ILEC facilities.
Method of Calculation:	Sum (Completion Date - Committed Order Due Date (for orders missed due to lack of ILEC facilities)) / (Number of Orders Missed due to Lack of ILEC Facilities in the Reporting Period)
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Reported By:	• By service group type • Disaggregated by 1-30 days, 31-90 days and >90 days
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** — **Pacific Bell Retail** — **GTE Retail** 2/4w (8db) analog loop (incl. Coin/analog PBX) — POTS - Business (fielded) — B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop — POTS - Business (Assured) — Dispatch Designed Services 2w digital loop(ISDN capable) — ISDN(BRI) — Dispatch Designed Services 2w digital loop(xDSL capable) — ADSL — Dispatch Designed Services 4w digital loop (1.544MBPS capable/HDSL) — ISDN(PRI)/DS1 — Dispatch Designed Services UNE Dedicated Transport — HICAP — HICAP Designed UNE Platform — Analogous Retail Service — N/A **Interconnection Trunks** — ILEC Dedicated Trunks — ILEC Dedicated Trunks
Business Rules:	
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog.

OSS OII Performance Measurements
Report Requirements

Provisioning — Measure 14

Title: Held Order Interval

Area	*Requirement Description*
Description:	Measures the time period that service orders are not completed by the original due dates for all ILEC reasons (including lack of facilities).
Method of Calculation:	Sum (Reporting Period Close Date - Committed Order Due Date) / (Number of Orders Pending and Past the Committed Due Date) *Note: For all orders pending and past the committed due date.*
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), by ILEC Affiliates
Reported By:	• By service group type
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** / **Pacific Bell Retail** / **GTE Retail** 2/4w (8db) analog loop (incl. Coin/analog PBX) / POTS - Business (fielded) / B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop / POTS - Business (Assured) / Dispatch Designed Services 2w digital loop(ISDN capable) / ISDN(BRI) / Dispatch Designed Services 2w digital loop(xDSL capable) / ADSL / Dispatch Designed Services 4w digital loop (1.544Mbps capable/HDSL) / ISDN(PRI)/DS1 / Dispatch Designed Services UNE Port–Basic Analog/Coin / POTS - Business (fielded) / CentraNet-Simple UNE Port–CENTREX / CENTREX / CentraNet -Complex UNE Port–ISDN (BRI) / CENTREX / CentraNet -Complex UNE Port–DS1/ISDN-PRI (incl. DS1 line port) / DS1/ISDN(PRI) / CentraNet -Complex UNE Port–PBX DID / PBX DID / CentraNet -Complex UNE Dedicated Transport (incl.DS1 and DS3) / HICAP / HICAP Designed UNE Platform (PB only) / Analogous Retail Service / N/A **Interconnection Trunks** / ILEC Dedicated Trunks / ILEC Dedicated Trunks
Business Rules:	• Excludes customer caused misses.
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • ~~When~~ results are less than parity for a reporting period, ILECs will provide ~~disaggr~~egation by Missed Appointment reason codes as diagnostic data. • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog.

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 15**

Title: Provisioning Trouble Reports (Prior to Service Order Completion) ~~PB~~

Area	***Requirement Description***
Description:	Measures the percent of troubles that are reported (via customer or indirectly by CLEC) that occur during the provisioning process.
Method of Calculation:	(Number of trouble reports that occur from the time of service order creation, up to and including the date of service order completion)/ (Total Number of service orders in reporting period)
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), by ILEC Affiliates
Reported By:	• By Resale, UNE Loop, UNE Port and PNP • By Affecting Service and Out of Service
Geographic Level:	Statewide
Measurable Standard:	**Parity for Pacific Bell:** **Pacific Bell Retail** Resale — Retail services UNE Loop — Retail services (outside plant disposition codes) UNE Port — Retail services (central office disposition codes) PNP - Port Out — (Issue still to be resolved)
Business Rules:	• Excludes CPE and IEC/CLEC caused troubles • Excludes Subsequent reports • Excludes Message Reports (circuit reports for which ILEC has no records) • Excludes ILEC employee generated reports
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data.

Provisioning

Measure 15

Change title to: Provisioning Trouble Reports (Prior Service Order Completion)

Under "Notes" add:

GTEC shall:

- immediately implement the programming changes necessary to collect customer migration data at the same level of detail provided by Pacific; and
- If fourth quarter Y2K concerns interfere with the implementation of this requirement, work shall continue as soon as internal operational programming is resumed.
- Provide a status report by February 1, 2000, including a proposal for either: (a) parity reporting; or (b) a benchmark comparable to that agreed to by Pacific.

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 15a**

Title: Provisioning Trouble Reports (Prior to Service Order Completion) - GTE

Area	*Requirement Description*
Description:	Measures the percent of troubles that are reported (via customer or indirectly by CLEC) that occur during the provisioning process. ***(GTE does not support this measure)***
Method of Calculation:	
Report Period:	
Report Structure:	
Reported By:	
Geographic Level:	
Measurable Standard:	
Business Rules:	
Notes:	

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 16**

Title: Percentage Troubles in 30 Days for New Orders

Area	***Requirement Description***
Description:	Measures the percent of network customer trouble reports received within 30 calendar days of service order completion. *Note: This measure is for all PB services and designed GTE services.*
Method of Calculation:	(Total Number of Customer Trouble reports received within 30 calendar days of service order completion / Total Number of new, move and change completed orders) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Reported By:	By service group type (including PNP)
Geographic Level:	Region (PB), Statewide (GTE)
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** / **Pacific Bell Retail** / **GTE Retail** 2/4w (8db) analog loop (incl. Coin/analog PBX) / POTS - Business (fielded) / B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop / POTS - Business (Assured) / Dispatch Designed Services 2w digital loop(ISDN capable) / ISDN(BRI) / Dispatch Designed Services 2w digital loop(xDSL capable) / ADSL / Dispatch Designed Services 4w digital loop (1.544Mbps capable/HDSL) / ISDN(PRI)/DS1 / Dispatch Designed Services UNE Port–Basic Analog/Coin / POTS - Business (fielded) / CentraNet -Simple UNE Port–CENTREX / CENTREX / CentraNet -Complex UNE Port–ISDN (BRI) / CENTREX / CentraNet -Complex UNE Port–DS1/ISDN-PRI (incl. DS1 line port) / DS1/ISDN(PRI) / CentraNet -Complex UNE Port–PBX DID / PBX DID / CentraNet -Complex UNE Dedicated Transport (incl. DS1 and DS3) / HICAP / HICAP Designed UNE Platform (PB only) / Analogous Retail Service / N/A **Interconnection Trunks** / ILEC Dedicated Trunks / ILEC Dedicated Trunks **PNP (Port out)** / **(Issue still to be resolved)** / **(Issue still to be resolved)**
Business Rules:	• Excludes CPE and IEC/CLEC caused troubles • Excludes troubles associated with inside wire • Excludes Trouble Reports Received on the Due Date (which instead are reported in the "Provisioning Troubles" measure) • Excludes Subsequent reports • Excludes Message Reports (circuit reports for which ILEC has no records) • -Excludes ILEC employee generated reports

Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data. • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog. • The parties will work to define measurable standard for PNP results. Recommendation will be submitted to CPUC ~~by July 1, 1999.~~ August 31, 1999.

OSS OII Performance Measurements
Report Requirements

Provisioning **Measure 17**

Title: Percentage Troubles in 7 Days for New Orders - GTE only

Area	*Requirement Description*
Description:	Measures the percent of network customer trouble reports received within 7 calendar days of service order completion. *Note: This measure is for non-designed services only*
Method of Calculation:	(Total Number of Network Customer Trouble Reports received within 7 calendar days of service order completion / Total new, move and change orders) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Reported By:	By service group type (including PNP) and Field Work/No Field Work as appropriate
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale is Retail for GTE (non-designed services only)** **Parity for UNE measured for the following UNEs:** — **GTE Retail** 2/4w (8db) loop (incl. Coin/analog PBX) — B1 Dispatch Non-Designed UNE Port – Basic analog/Coin — CentraNet - Simple **PNP (Port Out)** — **(Issue still to be resolved)**
Business Rules:	• Excludes CPE and IEC/CLEC caused troubles • Excludes Trouble Reports Received on the Due Date • Excludes Subsequent reports • Excludes ILEC employee generated reports • Excludes troubles associated with inside wiring.
Notes:	• ~~Availability of ILEC Affiliate data for review will be det... ...ted by the CPUC~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data. • The parties will work to define measurable standard for PNP results. Recommendation will be submitted to CPUC by July 1, 1999.

OSS OII Performance Measurements Report Requirements

Provisioning **Measure 18**

Title: Average Completion Notice Interval

Area	***Requirement Description***
Description:	Measures the average time per order to issue notification to CLEC of a completed order.
Method of Calculation:	**Fully Electronic:** Sum ((Date and Time of Completion Notification to CLEC) - (Date and Time of Work Completion)) / (Number of Orders Completed) **All Other Interfaces:** Sum (# of Completion Notices Returned within "X" Interval) / (# of Orders Completed) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, and by ILEC Affiliates
Reported By:	All interfaces
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell:** Fully electronic(LEX, EDI) - ~~standard to be determined~~ All other interfaces • Standard– 90% within 24 hours **GTE:** Fully Electronic (not available at this time) All other interfaces • Standard - 90% within 24 hours
Business Rules:	• 24 hour clock is used to measure interval • Excludes weekends and ILEC published holidays
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Provisioning Measure 18

Title: Average Completion Notice Interval

Under "Measurable Standards" add:
Pacific Bell:
Fully Electronic (LEX, EDI)- 20 minutes

Under "Notes" add:

GTEC shall:

- Within ninety days, complete the programming changes necessary to enable it to provide fully electronic completion notices for electronically submitted CLEC orders.
- Report same upon implementation of the system upgrades
- In the interim, a benchmark of 90% of completion notices returned within 24 hours shall apply to GTEC.

OSS OII Performance Measurements Report Requirements

Maintenance — Measure 19

Title: Customer Trouble Report Rate

Area	*Requirement Description*
Description:	Measures the total number of network customer trouble reports received within a calendar month per 100 circuits/UNEs.
Method of Calculation:	(Total Number of Customer initial and repeat network trouble reports / Number of access lines/circuits/UNEs in service at the end of the prior reporting period) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Report By:	By service group type (including PNP) & NXX Code Opening Troubles
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** — **Pacific Bell Retail** — **GTE Retail** 2/4w (8db) analog loop — POTS - Business (fielded) — B1 Dispatch Non-Designed 2/4w (5.5 db) assured analog loop — POTS - Business (Assured) — Dispatch Designed Services 2w digital loop (ISDN) — ISDN(BRI) — Dispatch Designed Services 2w digital loop (xDSL) — ADSL — Dispatch Designed Services 4w digital loop (ISDN PRI) — ISDN(PRI)/DS1 — Dispatch Designed Services UNE Port – Basic Analog — POTS - Business (fielded) — CentraNet-Simple UNE Port – CENTREX — CENTREX — CentraNet -Complex UNE Port – PBX DID — PBX DID — CentraNet -Complex UNE Port – ISDN (BRI) — CENTREX — CentraNet -Complex UNE Port – DS1/ISDN (PRI) — DS1/ISDN(PRI) — CentraNet -Complex UNE Dedicated Transport — HICAP — HICAP Designed UNE Platform (PB only) — Analogous Retail Service — N/A **Interconnection Trunks** — ILEC Dedicated Trunks — ILEC Dedicated Trunks **PNP - Port Out** — **(Issue still to be resolved)** — **(Issue still to be resolved)**
Business Rules:	• Excludes CPE and IEC/CLEC caused troubles • Excludes Subsequent reports • Excludes Message Reports (circuit reports for which ILEC has no records) • Access line/circuit count taken from previous month • Excludes ILEC employee generated reports
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data. • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog. • The parties will work to define measurable standard for PNP results. Recommendation will be submitted to CPUC by July 1, 1999.

OSS OII Performance Measurements Report Requirements

Maintenance — Measure 20

Title: Percentage of Customer Trouble Not Resolved Within Estimated Time

Area	*Requirement Description*
Description:	Measures the percent of trouble reports not cleared by the commitment time.
Method of Calculation:	(Total network trouble reports not cleared by the commitment time for ILEC reasons / Total network trouble reports completed) x 100
Report Period:	Monthly
Report Structure :	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Report By:	• By service group type (including PNP) & NXX Code Opening Troubles • By dispatch and no dispatch
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE** **Parity for UNE measured for the following UNEs:** — **Pacific Bell Retail** — **GTE Retail** 2/4w (8db) analog loop — POTS - Business (fielded) — B1 Dispatch Non-Designed 2/4w (5.5db) assured analog loop — POTS - Business (Assured) — Dispatch Designed Services 2w digital loop (ISDN) — ISDN(BRI) — Dispatch Designed Services 2w digital loop (xDSL) — ADSL — Dispatch Designed Services 4w digital loop (ISDN PRI) — ISDN(PRI)/DS1 — Dispatch Designed Services UNE Port – Basic Analog — POTS - Business (fielded) — CentraNet -Simple UNE Port – CENTREX — CENTREX — CentraNet -Complex UNE Port – PBX DID — PBX DID — CentraNet -Complex UNE Port – ISDN (BRI) — CENTREX — CentraNet -Complex UNE Port – DS1/ISDN (PRI) — DS1/ISDN(PRI) — CentraNet -Complex UNE Dedicated Transport — HICAP — HICAP Designed UNE Platform (PB only) — Analogous Retail Service — N/A **Interconnection Trunks** — ILEC Dedicated Trunks — ILEC Dedicated Trunks **PNP - Port Out** — **(Issue still to be resolved)** — **(Issue still to be resolved)**
Business Rules:	• Excludes CPE and IEC/CLEC caused troubles • Excludes Subsequent reports • Excludes Message Reports (circuit reports which ILEC has no records on) • Excludes ILEC employee generated reports • Excludes customer caused misses
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data. • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog. • The parties will work to define measurable standard for PNP results. Recommendation will be submitted to CPUC by July 1, 1999.

OSS OII Performance Measurements Report Requirements

Maintenance — Measure 21

Title: Average Time to Restore

Area	*Requirement Description*
Description:	Measures the average duration of customer trouble reports from the receipt of the customer trouble report to the time the trouble is cleared.
Method of Calculation:	(Total duration of customer network trouble reports) / (Total customer network trouble reports)
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Reported By:	• By service group type (including PNP) & NXX Code Opening Troubles • By dispatch and no dispatch
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE**

Parity for UNE measured for the following UNEs:	**Pacific Bell Retail**	**GTE Retail**
2/4w (8db) analog loop	POTS - Business (fielded)	B1 Dispatch Non-Designed
2/4w (5.5 db) assured analog loop	POTS - Business (Assured)	Dispatch Designed Services
2w digital loop (ISDN)	ISDN(BRI)	Dispatch Designed Services
2w digital loop (xDSL)	ADSL	Dispatch Designed Services
4w digital loop (ISDN PRI)	ISDN(PRI)/DS1	Dispatch Designed Services
UNE Port – Basic Analog	POTS - Business (fielded)	CentraNet -Simple
UNE Port – CENTREX	CENTREX	CentraNet -Complex
UNE Port – PBX DID	PBX DID	CentraNet -Complex
UNE Port – ISDN (BRI)	CENTREX	CentraNet -Complex
UNE Port – DS1/ISDN (PRI)	DS1/ISDN(PRI)	CentraNet -Complex
UNE Dedicated Transport	HICAP	HICAP Designed
UNE Platform (PB only)	Analogous Retail Service	N/A
Interconnection Trunks	ILEC Dedicated Trunks	ILEC Dedicated Trunks ~~ILEC Dedicated Trunks~~
PNP - Port ~~Back~~Out	**(Issue still to be resolved)**	**~~(Issue still to be resolved)~~**

Business Rules:	• Excludes CPE and IEC/CLEC caused troubles • Excludes Subsequent reports • Excludes Message Reports (circuit reports which ILEC has no records on) • Excludes ILEC employee generated reports

Notes:	• Availability of ILEC Affiliate data for review will be determined by the CPUC. • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data. • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog. • The parties will work to define measurable standard for PNP results. Recommendation will be submitted to CPUC by July 1, 1999.

OSS OII Performance Measurements Report Requirements

Maintenance — Measure 22

Title: POTS Out of Service Less Than 24 Hours

Area	*Requirement Description*
Description:	Measures the percent of POTS out-of-service trouble reports cleared in less than 24 hours.
Method of Calculation:	(Total number of out of service network troubles cleared in less than 24 hours / Total number of out of service network troubles reported) x 100 *Note: For non-design services only*
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates
Reported By:	By POTS Residence and Business (Resale and UNE)
Geographic Level:	Statewide
Measurable Standard:	**Parity for Resale (POTS) for Pacific Bell and GTE** **Parity for UNEs (Basic)** — **Pacific Bell Retail** — **GTE Retail** 2/4w (8db) analog loop — POTS - Business (fielded) — B1 Dispatch Non-Designed UNE Port – Basic Analog — POTS - Business (fielded) — CentraNet - Simple UNE Platform – POTS — Analogous Retail Service — N/A
Business Rules:	• Residential and Business POTS only • Excludes no access • Interval for tickets received Saturday and Sunday begins no later than Monday morning • Excludes CPE and IEC/CLEC caused troubles • Excludes Subsequent reports • Excludes Message Reports (circuit reports for which ILEC has no records) • Excludes ILEC employee generated reports
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data.

OSS OII Performance Measurements
Report Requirements

Maintenance **Measure 23**

Title: Frequency of Repeat Troubles in 30 Day Period

Area	***Requirement Description***		
Description:	Measures the percent of customer network trouble reports received within 30 calendar days of a previous report.		
Method of Calculation:	(Total customer network trouble reports received within 30 calendar days of a previous customer report / Total customer network trouble reports) x 100		
Report Period:	Monthly		
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), and by ILEC Affiliates		
Report By:	By service group type (including PNP) & NXX Code Opening Troubles		
Geographic Level	Statewide		
Measurable Standard:	**Parity for Resale is Retail for Pacific Bell and GTE**		
	Parity for UNE measured for the following UNEs:	**Pacific Bell Retail**	**GTE Retail**
	2/4w (8db) analog loop	POTS - Business (fielded)	B1 Dispatch Non-Designed
	2/4w (5.5 db) assured analog loop	POTS - Business (Assured)	Dispatch Designed Services
	2w digital loop (ISDN)	ISDN(BRI)	Dispatch Designed Services
	2w digital loop (xDSL)	ADSL	Dispatch Designed Services
	4w digital loop (ISDN PRI)	ISDN(PRI)/DS1	Dispatch Designed Services
	UNE Port – Basic Analog	POTS - Business (fielded)	CentraNet -Simple
	UNE Port – CENTREX	CENTREX	CentraNet -Complex
	UNE Port – PBX DID	PBX DID	CentraNet -Complex
	UNE Port – ISDN (BRI)	CENTREX	CentraNet -Complex
	UNE Port – DS1/ISDN (PRI)	DS1/ISDN(PRI)	CentraNet-Complex
	UNE Dedicated Transport	HICAP	HICAP Designed
	UNE Platform (PB only)	Analogous Retail Service	N/A
	Interconnection Trunks	ILEC Dedicated Trunks	ILEC Dedicated Trunks
	PNP - Port Out	**(Issue still to be resolved)**	**(Issue still to be resolved)**
Business Rules:	• Excludes CPE and IEC/CLEC caused troubles • Excludes troubles associated with inside wiring • Excludes Subsequent reports • Excludes Message Reports • -Excludes ILEC employee generated reports		

Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • When results are less than parity for a reporting period, ILECs will provide disaggregation by Maintenance Disposition codes as diagnostic data. • ADSL was selected as the analog for resale services and UNE DSL 2-wire loop because it currently is the most relevant analog. • The parties will work to define measurable standard for PNP results. Recommendation will be submitted to CPUC by July 1, 1999.

OSS OII Performance Measurements
Report Requirements

Network Performance **Measure 24**

Title: Percent Blocking on Common Trunks

Area	***Requirement Description***
Description:	Measures the percent of common and shared transport trunk groups exceeding 2% blockage. *Note: Includes histogram distribution chart*
Method of Calculation:	(Number of common and shared transport trunk groups exceeding 2% blockage / Total number of common and shared transport trunk groups) x 100
Report Period:	Monthly (Exception Reporting Only)
Report Structure:	Reported by common/shared transport trunk group .
Report By:	By Central Office and Trunk type where individual trunk types can be distinguished
Geographic Level:	Statewide
Measurable Standard:	~~**Issue still to be resolved**~~**Pacific Bell:** **Benchmark: 2% of trunk groups blocking at no more than 2 %** ~~**GTE:**~~ ~~**(Issue to be resolved)**~~
Business Rules:	
Notes:	Measured by: • Trunk type (e.g., EAS, Toll, InterLATA, 911, etc.) • Total trunk groups • Percent Blocking • Location "A" • Report month • Threshold exceptions

Network Performance Measure 24

Title: Percent Blocking on Common Trunks

Under "Measurable Standards":

Note deletions

OSS OII Performance Measurements
Report Requirements

Network Performance **Measure 25**

Title: Percent Blocking on Interconnection Trunks

Area	***Requirement Description***
Description:	Measures the percent of final dedicated interconnection trunk groups exceeding 2% blockage. *Notes: 1)Includes histogram distribution chart.* *2)Applies to those trunks where the ILEC has augmentation control.* *3) Does not apply when trunks are provisioned as two-way trunks.*
Method of Calculation:	(Number of final dedicated interconnection trunk groups exceeding 2% blockage / Total number of final dedicated interconnection trunk groups) x 100
Report Period:	Monthly (Exception Reporting Only)
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies), by ILEC Affiliates
Report By:	By Central Office and Trunk type where individual trunk types can be distinguished
Geographic Level:	Statewide
Measurable Standard:	**Parity for Pacific Bell and GTE – comparison made to ILEC final trunk groups**
Business Rules:	• Only measured on trunks where ILEC has outgoing traffic to CLECs, and where ILEC controls trunk capacity. • Threshold exception trunk detail • Report month
Notes:	Measured by: • Trunk type (e.g., EAS, Toll, InterLATA, 911, etc.) • Total trunk groups • ILEC trunk groups • CLEC trunk groups • Threshold exceptions • ILEC end office to CLEC end office • ILEC tandem to CLEC end office • ~~Availability of ILEC affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements
Report Requirements

Network Performance — Measure 26

Title: NXX Loaded by LERG Effective Date

Area	*Requirement Description*
Description:	Measures the number of NXXs loaded and tested by the LERG effective date.
Method of Calculation:	((Number of NXXs loaded and tested by LERG effective date) / (Number of NXXs scheduled to be loaded and tested by LERG effective date)) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies)and by ILEC Affiliates
Report By:	Reported for all NXX codes scheduled to be loaded in reporting period
Geographic Level:	Statewide
Measurable Standard:	**Parity for Pacific Bell and GTE – comparison made to results for loading ILEC NXX codes by the LERG effective date.**
Business Rules:	• Excludes any NXX codes with requested loading interval of less than the industry standard (currently 45 days).
Notes:	• NXX loading procedures include central office/tandem translations, verification of translations, call through testing, and AMA testing. • TRUCALL billing validation testing is not used unless maintenance trouble is reported (Pacific Bell only) • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements
Report Requirements

Network Performance **Measure 27**

Title: **Network Outage Notification**

Area	*Requirement Description*
Description:	Measures the time period for notification of a network outage. To be measured for the following: • Switching • Transport • Network Fire Related Incident • Network Blockage • 911 • SS7
Method of Calculation:	Sum (Date & Time of Outage Notification) - (Date & Time of ILEC Outage Awareness)/Number of Outages
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate , ILEC(if analog applies), and ILEC affiliates
Report By:	Switching transport, network fire related incident, network blockage, 911, SS7
Geographic Level:	Statewide
Measurable Standard:	**Parity for Pacific Bell and GTE**
Business Rules:	• Exception reporting only by central office.
Notes:	• CLECs will be notified of all qualifying outages • If ILECs develop a notification process which is parity by design, once all parties agree that complete parity is being provided, the ILECs may petition to have this measure deleted. • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements
Report Requirements

Billing **Measure 28**

Title: Usage Timeliness

Area	*Requirement Description*
Description:	This measure captures the elapsed time between the recording of usage data generated either by CLEC retail customers or access usage associated with CLEC customers and the time when the data set, in a compliant format, is successfully transmitted to the CLEC.
Method of Calculation:	Sum ((Data Set Transmission Availability Date) - (Date of Message Recording)) / (Count of All Messages available for Transmission in Reporting Period)
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate, by ILEC (if analog applies) and by ILEC Affiliates
Report By:	• Resale • UNE (IntraLATA and InterLATA, etc.) • Jointly provided switched access (associated with meet point billing)
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell:** Parity for Resale and UNE. Benchmark for Jointly provided switched access: Standard - 95% in 5 Days ~~(Benchmark level still to be resolved)~~ **GTE:** ~~Benchmark for~~Parity for Resale and, UNE: Resale Toll – June 1999 Resale Local – November 1999 UNE – November 1999 ~~And~~Benchmark for Jointly provided switched access: Standard – 95% in 6 Days ~~(Benchmark level still to be resolved)~~
Business Rules:	
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC~~

OSS OII Performance Measurements
Report Requirements

Billing **Measure 29**

Title: Accuracy of Usage Feed

Area	***Requirement Description***
Description:	Measures the completeness of content, accuracy of information and conformance of formatting of the records the ILEC transmits to the CLEC in the reporting period. *Note: This data will be reported by CLECs. If no data received from CLEC, ILEC will not report the measure.*
Method of Calculation:	((Number of Usage Records Delivered in the Reporting Period That Reflected Complete Information Content and Proper Formatting) / (Total Number of Usage Records Transmitted)) x 100
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate
Report By:	
Geographic Level:	Statewide
Measurable Standard:	**Benchmark for Pacific Bell and GTE** ***There is agreement that performance standard for this measure will not be established until a meeting with both ILECs and CLECs is held and criteria for this measure are defined and accepted by all parties. Recommendation will be submitted to CPUC by August 1, 1999.***
Business Rules:	
Notes:	

OSS OII Performance Measurements
Report Requirements

Billing — Measure 30

Title: Wholesale Bill Timeliness

Area	*Requirement Description*
Description:	This measure captures the elapsed number of days between the scheduled close of a Bill Cycle and the ILEC's successful transmission of the associated invoice to the CLEC. Disaggregated by: • Resale • UNE (IntraLATA and InterLATA, etc.) • Facilities/Interconnection
Method of Calculation:	Sum ((Invoice Transmission Availability Date) – (Date of Scheduled Bill Cycle Close*)) / (Count of Invoices Transmitted in Reporting Period) *Bill Cycle Close = Bill Date
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, and by ILEC Affiliates
Report By:	• Resale • UNE (IntraLATA and InterLATA, etc.) • Facilities/Interconnection
Geographic Level:	Statewide
Measurable Standard:	**Benchmark for Pacific Bell and GTE:** Standard – 99% within 10 days
Business Rules:	• Includes only mechanized bills. • Excludes paper bill, magnetic bill, CD ROM bill or Custom Bill diskette bill.
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements
Report Requirements

Billing **Measure 31**

Title: Usage Completeness

Area	***Requirement Description***
Description:	Measures the percentage of usage charges appearing on the correct bill.
Method of Calculation:	(Count of usage charges on the bill that were recorded within last 30 days / total count of usage charges on the bill) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies)and by ILEC Affiliates
Report By:	• Resale • UNE (IntraLATA and InterLATA, etc.) • Facilities/Interconnection
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell and GTE:** Parity for Resale and UNE Benchmark for Facilities/Interconnection ~~**(Benchmark level still to be resolved)**~~ **Standard - 95%**
Business Rules:	• Excludes summarized charges
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC~~

OSS OII Performance Measurements
Report Requirements

Billing — Measure 32

Title: Recurring Charge Completeness

Area	*Requirement Description*
Description:	Measures the percentage of fractional recurring charges appearing on the correct bill.
Method of Calculation:	(Count of fractional recurring charges that are on the correct bill* / total count of fractional recurring charges that are on the bill) x 100 *Correct bill = next available bill *Note: Pacific Bell will provide by count of charges.* *GTE will provide by dollar charges.*
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies) and by ILEC Affiliates
Report By:	• Resale • UNE (IntraLATA and InterLATA, etc.) • Facilities/Interconnection
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell:** Parity for Resale and UNE POTS Benchmark for Facilities/Interconnection and UNE Specials Standard – 90% ~~(Benchmark level still to be resolved)~~ **GTE:** Interim Benchmark for Resale, and UNE: ~~and Facilities/Interconnection (Issue to be resolved)~~ Standard – 80% (until February 2000) Parity will be standard beginning in February 2000 Benchmark for Facilities/Interconnection: Standard – 90%
Business Rules:	• The effective date of the recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • GTE will compare CLEC results to a statistically valid sample of GTE results.

OSS OII Performance Measurements
Report Requirements

Billing — Measure 33

Title: Non-Recurring Charge Completeness

Area	*Requirement Description*
Description:	Measures the percentage of non-recurring charges appearing on the correct bill.
Method of Calculation:	(Count of non-recurring charges that are on the correct bill / total count of non-recurring charges that are on the bill) x 100 *Correct bill = next available bill *Note: Pacific Bell will provide by count of charges.* *GTE will provide by dollar charges.*
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies)and by ILEC Affiliates
Report By:	• Resale • UNE (IntraLATA and InterLATA, etc.) • Facilities/Interconnection
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell:** Parity for Resale and UNE POTS Benchmark for Facilities/Interconnection and UNE Specials ~~(Benchmark level still to be resolved)~~ **Standard - 90%** **GTE:** Interim Benchmark for Resale and UNE: Standard – 80% (until February 2000) Parity will be standard beginning in February 2000 Benchmark for Facilities/Interconnection: Standard – 90% ~~Benchmark for Resale, UNE POTS and Facilities/Interconnection~~ ~~(Benchmark level still to be resolved)~~
Business Rules:	• The effective date of the non-recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements Report Requirements

Billing — Measure 34

Title: Bill Accuracy

Area	*Requirement Description*
Description:	Measures the percentage of the total bill amount that is not adjusted by correcting service orders or adjustments for the month.
Method of Calculation:	(Total monies billed without corrections/total monies billed) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies) and by ILEC Affiliates

Report By:	• Resale
	  • Usage
	  • Recurring Charges
	  • Non-Recurring Charges
	• UNE (IntraLATA and InterLATA, etc.)
	  • Usage
	  • Recurring Charges
	  • Non-Recurring Charges
	• Facilities/Interconnection
	  • Usage
	  • Recurring Charges
	  • Non-Recurring Charges

Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell:** Parity for Resale and UNE POTS Benchmark for Facilities/Interconnection and UNE Specials ~~**(Benchmark level still to be resolved)**~~ Standard - 95% **GTE:** Benchmark for Resale~~,~~ and UNE~~:~~ ~~POTS~~ • Standard - 97% Benchmark for Facilities~~/I~~nterconnection: ~~**(Benchmark level still to be resolved)**~~ Standard - 95%
Business Rules:	
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

OSS OII Performance Measurements
Report Requirements

Billing **Measure 35**

Title: Duplicate Billing (Disconnect Bill Accuracy)

Area	*Requirement Description*
Description:	Measures the number of former ILEC customers sent bills erroneously after conversion to CLEC. ~~(No agreement has been reached with ILECs to support this measure)~~
Method of Calculation:	(Number of former ILEC customers who receive erroneous bills after conversion/ Number of former ILEC customers converted) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies) and by ILEC Affiliates
Report By:	Full Facilities based conversion, Resale and UNE
Geographic Level:	Statewide
Measurable Standard:	~~(Issue still to be resolved)~~
Business Rules:	
Notes:	• Excludes the final bill to an end user and bills for an residual retail services provided by the ILEC to the end user • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Title: Duplicate Billing (Disconnect Bill Accuracy)

Under "Notes" add:

Pacific, GTEC, and the CLECs should further discuss and consider developing a measurement and submit their findings to the Commission by February 1, 2000. Until additional information is submitted, the Commission chooses not to adopt this measure.

OSS OII Performance Measurements
Report Requirements

Billing **Measure 36**

Title: Accuracy of Mechanized Bill Feed

Area	***Requirement Description***
Description:	Measures the percentage of mechanized bill feeds that are accurately passed to the CLEC in the reporting period. *Note: This data will be reported by CLECs. If no data received from CLEC, ILEC will not report the measure.*
Method of Calculation:	(Total # of files that passed / Total # of files sent in that reporting period) x 100
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate
Report By:	
Geographic Level:	Statewide
Measurable Standard:	**Benchmark for Pacific Bell and GTE** ***There is agreement that performance standard for this measure will not be established until a meeting with both ILECs and CLECs is held and criteria for this measure are defined and accepted by all parties. Recommendation will be submitted to CPUC by August 1, 1999.***
Business Rules:	
Notes:	

OSS OII Performance Measurements
Report Requirements

Database Updates — Measure 37

Title: Average Database Update Interval - Pacific Bell

Area	*Requirement Description*
Description:	Measures the average time to update databases. • ***DA/Listings Database***
Method of Calculation:	((Completion Date & Time) – (Update Submission Date & Time)) / Count of Updates Completed in Reporting Period
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate , by ILEC (if analog applies) and by ILEC Affiliates
Report By:	• Service Order generated updates • Direct gateway input
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell:** Parity for service order generated updates Benchmark for direct gateway input updates ~~**(Benchmark level still to be resolved)**~~ **Standard - 95% in 8 Days**
Business Rules:	
Notes:	• CLECs reserve the right to request additional databases be included in this measure. • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Database Updates Measure 37

Change Title to: Average Database Update Interval

Under "Notes" add:

- GTEC shall present certification by an independent auditor to the Commission by February 1, 2000 that GTEC's system offers parity by design. If GTEC fails to provide the certification required under this measure, GTEC shall commence reporting the average database update interval on an interim basis under the terms agreed to by Pacific.

OSS OII Performance Measurements
Report Requirements

Database Updates

Measure 37a

Title: Average Database Update Interval -GTE

Area	*Requirement Description*
Description:	Measures the average time to update databases. • ***DA/Listings Database*** ***(GTE does not support this measure)***
Method of Calculation:	
Report Period:	
Report Structure:	
Report By:	
Geographic Level:	
Measurable Standard:	
Business Rules:	
Notes:	

OSS OII Performance Measurements Report Requirements

Database Updates — Measure 38

Title: Percent Database Accuracy - Pacific Bell

Area	*Requirement Description*
Description:	Measures the percentage of database updates completed without error. • ***911 Databases*** • ***DA/Listings Database***
Method of Calculation:	((Count of Updates Completed without error) / (Count of Updates Completed)) x 100
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate, by ILEC (if analog applies) and by ILEC Affiliates
Report By:	For DA/Listings: • Service Order generated updates • Direct gateway input For E911 Database: • Service Order generated updates • Direct gateway input
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell:** Parity for service order generated updates Direct Gateway Input (~~Issue still to be resolved~~)
Business Rules:	• Excludes CLEC caused errors
Notes:	• CLECs reserve the right to request additional databases be included in this measure. • ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Database Updates Measure 38

Change Title to:

Percent Database Accuracy - Pacific Bell and GTEC

Under "Notes" add:

- GTEC shall complete an independent audit of its E911 and Directory Assistance/Directory Listings systems within sixty days of the effective date of this order. If parity by design is not established under the audit, GTEC shall demonstrate, in its February 1, 2000 filing, its capability to comply with the benchmark established for Pacific.

- Pacific shall report information on direct gateway updates as a special report until the Emergency 911/Listings Fix-it Team completes its analysis.

OSS OII Performance Measurements
Report Requirements

Database Updates

Measure 38a

Title: Percent Database Accuracy - GTE

Area	*Requirement Description*
Description:	Measures the percentage of database updates completed without error. • ***911 Databases*** • ***DA/Listings Database*** ***(GTE does not support this measure)***
Method of Calculation:	
Report Period:	
Report Structure:	
Report By:	
Geographic Level:	
Measurable Standard:	
Business Rules:	
Notes:	

OSS OII Performance Measurements
Report Requirements

Database Updates — Measure 39

Title: E911/911 MS Database Update Average

Area	*Requirement Description*
Description:	Measures the percentage of E911/911database updates completed within 48 hours.
Method of Calculation:	(Number of records updated within 48 hours / Total number of records updated) x 100
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate, by ILEC (if analog applies) and by ILEC Affiliates
Report By:	**(Issue still to be resolved)**
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell and GTE:** Parity for service order generated updates ~~Direct gateway input **(Issue still to be resolved)**~~
Business Rules:	
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Database Updates Measure 39

Title: E911/911 MS Database Update Average.

Under "Measurable Standard" add:

- Direct gateway input: 48 hours

OSS OII Performance Measurements
Report Requirements

Collocation

Measure 40

Title: Average Time to Respond to a Collocation Request

Area	Requirement Description
Description:	Measures the average time an ILEC takes to respond to a CLEC's collocation request.
Method of Calculation:	~~Sum((Request Response Date) (Request submission Date))~~(# of Requests Returned in "X" Interval) / (Count of Requests Submitted in Reporting Period) x 100
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate and by ILEC Affiliates

Report By:	• All Collocation
	  • Space Availability
	  • Price and Schedule Quote

Geographic Level:	Statewide
Measurable Standard:	~~**Benchmark for Pacific Bell:**~~ **Space Availability - (~~Benchmark level to be resolved~~)** **Price and Schedule Quote – ~~95% in 30 days~~** **~~and Benchmark for GTE:~~** **~~(Benchmark level still to be resolved)~~**
Business Rules:	• Excludes orders canceled by CLEC
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~ • Interval to begin upon receipt of valid request per valid published ILEC guidelines.

Collocation Measure 40

Title: Average Time to Respond to a Collocation Request.

Under "Measurable Standards" add:

Space Availability: 100% in 15 days
Price and Schedule Quotes: 30 days

Add to "Business Rules"

- Applies to all requests for physical collocation space.

Add to "Notes"
If time intervals for new or augmented collocation installations are adopted in any future Local Competition proceeding, these time intervals shall supercede the benchmarks set under this measure and shall be measured at 100% average response time. Pacific/GTEC shall file by Advice Letter a compliance filing to incorporate any new requirements adopted in the Local Competition proceeding.

OSS OII Performance Measurements Report Requirements

Collocation — Measure 41

Title: Average Time to Provide a Collocation Arrangement

Area	*Requirement Description*
Description:	Measures the average time it takes an ILEC to complete (build) a collocation arrangement.
Method of Calculation:	~~Sum((Date Collocation Arrangement is Complete) (Date Application for Collocation Arrangement is approved* by ILEC))~~(# of Collocation Arrangements Completed in "X" Interval) / (Total Number of Collocation Arrangements Completed ~~D~~during the Reporting Period) x 100 *"Approved" means ILEC approves the application and has received, from CLEC, financial payment or bond.
Report Period:	Monthly
Report Structure:	Individual CLECs, CLECs in the aggregate and by ILEC Affiliates

Report By:	• All Collocation
	  • New
	  • Augment

Geographic Level:	Statewide
Measurable Standard:	~~**Benchmark for Pacific Bell and GTE:**~~ ~~**(Benchmark level still to be resolved)**~~
Business Rules:	• Excludes orders canceled by CLEC
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the CPUC.~~

Collocation Measure 41

Title: Average Time to Provide a Collocation Arrangement.

Under "Measurable Standards" add:

Benchmark for Pacific
New: 100% compliance within the time intervals set in its tariffs
Augmentation: 100% in 80 days

Benchmark for GTEC
New: 90% compliance within 90 days.
Augmentation: 100% in 80 days

Add to "Business Rules"

- Applies to requests for physical collocation space.

Add to "Notes"

- If time intervals for new or augmented collocation installations are adopted in any future Local Competition proceeding, these time intervals shall supercede the benchmarks set under this measure and shall be measured at 100% average response time. Pacific/GTEC shall file by Advice Letter compliance filing to incorporate any new requirements adopted in the Local Competition proceeding.

OSS OII Performance Measurements
Report Requirements

Interfaces

Measure 42

Title: Percentage of Time Interface is Available

Area	*Requirement Description*
Description:	Measures percent of time OSS interface is available compared to scheduled availability.
Method of Calculation:	((Number of Scheduled System Available Hours) - (Number of Unscheduled System Unavailable Hours)) / Scheduled System Available Hours) x 100
Report Period:	Monthly
Report Structure:	CLECs in the aggregate, by ILEC (if analog applies)
Reported By:	By interface type for all interfaces accessed by CLECs (e.g., pre-ordering, ordering, and maintenance)
Geographic Level:	Statewide
Measurable Standard:	**Parity for Pacific Bell for systems used by both ILEC and CLEC** **Benchmark for Pacific Bell (for all other systems)and GTE (all systems)** ~~**(Benchmark level still to be resolved)**~~**Standard – 99.25%**
Business Rules:	• Outage hours are obtained from outage reports • Any change requests for extended availability during the reporting period are added to the scheduled hours.
Notes:	

OSS OII Performance Measurements
Report Requirements

Interfaces **Measure 43**

Title: Average Notification of Interface Outages

Area	***Requirement Description***
Description:	Measures the time it takes the ILEC to notify the CLEC of an outage of an interface.
Method of Calculation:	Sum((Date and time of Outage Notification to CLECs)-(Date and time of ILEC awareness of Interface Outage))/Total Number of Interface Outages
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, and by ILEC Affiliates
Reported By:	By interface type for all interfaces accessed by CLECs
Geographic Level:	Statewide
Measurable Standard:	**Pacific Bell and GTE:** **Benchmark** • Standard – 97% in 15 minutes (Pacific Bell) • Standard - ~~(GTE) (Benchmark level still to be resolved)~~**97% in 15 minutes (GTE)**
Business Rules:	
Notes:	• ~~Availability of ILEC Affiliate data for review will be determined by the GPUC.~~

OSS OII Performance Measurements
Report Requirements

Interfaces **Measure 44**

Title: Center Responsiveness

Area	*Requirement Description*
Description:	Measures the average time it takes the ILEC's work center to answer a call.
Method of Calculation:	Sum (Date and Time of Call answer - Date and Time of Call Receipt) / (Total calls answered by center))
Report Period:	Monthly
Report Structure:	CLECs in the aggregate, and by ILEC (if analog applies)
Report By:	• ILEC Ordering Center • ILEC Repair Center
Geographic Level:	Statewide
Measurable Standard:	**Repair Centers** Parity - Pacific Bell Benchmark - GTE, • Standard - average 20 seconds **Benchmark for Pacific Bell and GTE (Ordering Centers)** • Standard – average 15 seconds (Pacific Bell) • Standard – average 20 seconds (GTE)
Business Rules:	
Notes:	• Measured by individual queue, if applicable, in each ILEC center.

REPORTING PROCESS

Performance reports will be made available to the CLECs and the Public Utilities Commission no later than July 15, 1999 (for the June report month). Any deviations in the initial implementation of the individual measures will be noticed by the ILEC to the CPUC and the CLECs, no later than May 15, 1999.[6]

Subsequent performance reports will thereafter be provided by the fifteenth calendar day of the month succeeding the reporting period. The reporting period is the calendar month, unless otherwise noted. Positive reporting will be done for all measures, even those reported on an exception only basis.

For those measures where results appear to be statistically less than parity or not meeting the benchmark level, ~~the ILEC~~GTEC will perform analysis of the data. This analysis will detail the underlying causes contributing to the reported performance results. This analysis will be made available to the same recipients as the monthly performance report thirty days after the website publication of the monthly results. Pacific Bell will supply this analysis to the CLECs upon request within thirty days after the request.

Authorized users will have access to monthly reports through an interactive website. Each CLEC will have access to its own data, aggregate CLEC data, ~~and~~ ILEC data and ILEC affiliate data. The Public Utilities Commission will have access to reports for all entities, including ILEC Affiliate data. ILEC Affiliate data will not be included in CLEC aggregate data. (As is noted in the report requirement section, availability of ILEC affiliate data for review by the CLEC will be determined by the CPUC.)

In addition to the performance measure results themselves, the raw data supporting the results will be available to the CLECs and the Public Utilities Commission. Raw data will be archived for a period of 24 months to provide an adequate audit trail and will be retained with sufficient detail so that CLECs can reasonably reconcile the data captured by the ILEC (for the CLEC) with its own internal data. Furthermore, data that relates to the ILEC's own performance would be retained, at a consistent level of disaggregation comparable to that reported for the CLECs.

Pacific Bell will provide data which comprise the results and which are readily available from the systems which provide the reportable data. Pacific Bell currently has the capability to provide PON information associated with Ordering measures. Pacific Bell agrees to develop the system capability to also provide PON data for Provisioning measures. The current system programming schedule for Pacific Bell's reports tracking system has this system upgrade planned for August 1999.

[6] In its January 1999 "Issues Filing", GTE will document any measures which it knows at that time it will not have available by the June 1999 report month.

SERVICE GROUP TYPE DISAGGREGATION

Type	GTE	Pacific Bell
RESALE		
Residential POTS	X (incl. Res. ISDN BRI)	X
Business POTS	X (incl. Bus. ISDN BRI and PBX)	X
ISDN		
ISDN BRI		X
ISDN PRI		
CENTREX		X
PBX		X
PBX Analog		
PBX DID		
Specials (i.e., Designed Services)	X (incl. PRI)	
DDS		X
DS-1/ISDN PRI		X
DS-3		X
VGPL/DS0		X
UNBUNDLED NETWORK ELEMENTS		
UNE Loops		
Non-Designed	X	
UNE Loop 8dB weighted 2/4 wire analog basic/Coin		X *(incl. Analog PBX)*
Designed	X	
UNE Loop 5.5dB 2 or 4 wire analog assured		X
UNE Loop 2 wire Digital ISDN Capable		X
UNE Loop 2 wire Digital xDSL Capable		X
UNE Loop 4 wire Digital (1.544mbps Capable)/HDSL		X (incl. Digital PBX, HDSL)
UNE Loop PBX		
UNE Port		
Non-Designed	X	
UNE Port Analog (incl. PBX analog port)		X (incl. Coin)
UNE Port Coin		
Designed	X	
UNE Port Centrex		X
UNE Port ISDN BRI		X

SERVICE GROUP TYPE DISAGGREGATION

Type	GTE	Pacific Bell
UNE Port ISDN PRI (including DS-1 line port)		X
UNE Port PBX DID		X
UNE Dedicated Transport	X	X
UNE Dedicated Transport DS-1		
UNE Dedicated Transport DS-3		
UNE PLATFORM		
UNE Platform (i.e., loop + port + transport		X
INTERCONNECTION		
Interconnection Trunks	X	X
PNP		
	X	X
PROJECTS		
Projects	X	X

Consensus on disaggregation is defined by the above matrix.

INTERCONNECTION TRUNKS will be included in measures: 2, 7, 8, 11, 12, 13, 14, 19, 20, 21, 23, 25, 27, 31, 32, 33, 34.

PNP is considered a facilities based service group type. PNP will be a level of disaggregation for the following measures: 2, 4, 9, 10, 15, 16, 19, 20, 21, 23.

PROJECTS are defined as follows:

- **PB:** POTS greater than 20 lines, for Specials greater than 6 lines, and UNE Loops greater than 20 loops.
- **GTE:** Res and Bus POTS greater than 20 lines, PBX, ISDN and CentraNet greater than 6 lines, UNE Loops greater than 16 loops.

Results for projects are being considered as a separate level of disaggregation for measurements 2 and 7~~, 7, and 8~~. For all other measures which have an SGT as a level of disaggregation, project results are included as part of the associated SGT.

- The current proposal being considered is the following:
    1. ILECs to study like sized projects, up to 50 lines, for CLEC/ILEC to determine if meaningful comparisons can be made. If this study shows that a meaningful comparison can be made, results for these types of projects will be reported for both ILECs and CLECs, and incentives applied as appropriate. ILECs have agreed to report this study, and study results are expected in April, 1999.
    2. If study results show that a meaningful comparison cannot be made, then the options are:
        - Report data, but no incentives apply.
        - Report no data on projects.

CALIFORNIA OSS OII PERFORMANCE MEASUREMENTS

SERVICE ORDER TYPES

- New Service Installations
- Service Migrations without Changes
- Service Migrations with Changes
- Move and Change activities
- Feature Changes
- Service Disconnects

AUDITING – Pacific Bell

Initial Audit:

The Parties agree that an Initial Audit will be performed to ensure that the individual ILEC reporting procedures are sound and that data collection and reporting are timely, accurate and complete. The Parties agree that the Initial Audit will include all systems, processes and procedures associated with the production and reporting of performance measurement results. This Audit, which will commence in August 1999, will be completed by a third party auditor. The third party auditor will be jointly selected by Pacific Bell and the CLECs. If the parties cannot agree on the auditor, the auditors selected by each party will jointly determine the auditor. Costs for the Initial Audit will be borne by Pacific Bell.

Pacific Bell shall submit the results of the Initial Audit to the Commission, and will distribute copies (which include only non-proprietary information) to Parties on the OSS OII service list.

Annual Audits:

The Parties also support an annual comprehensive audit of the ILECs' reporting procedures and reportable data. The Parties agree that the Annual Audit will include all systems, processes and procedures associated with the production and reporting of performance measurement results. This audit would be on behalf of all CLECs and will be performed by a third party auditor. The third party auditor conducting the Annual Audit will be selected by the same method as the selection of the auditor for the Initial Audit.

Pacific Bell will pay for fifty percent (50%) of the costs of the Annual Audits, and the other fifty percent (50%) of the costs will be divided among all CLECs for which measures are reported in any part of that year, in proportions mutually agreed to by the CLECs, and if no such agreement is reached, as determined by the Commission.

The comprehensive Annual Audits will be conducted every twelve (12) months, with the first such audit commencing twelve (12) months after the commencement of the Initial Audit. At its completion, Pacific Bell shall submit its annual comprehensive audit to the Commission, and distribute copies (which include only non-proprietary information) to parties on the OSS OII service list.

Mini – Audits:

In addition to an annual audit, Pacific Bell and CLECs agree that the CLECs would have the right to mini-audits of individual performance measures/sub-measures during the year. When a CLEC has reason to believe the data collected for a measure is flawed or the reporting criteria for the measure is not being adhered to, it has the right to have a mini-audit performed on the specific measure/sub-measure upon written request (including e-mail), which will include the designation of a CLEC representative to engage in discussions with the ILEC about the requested mini-audit. If, 30 days after the CLEC's written request, the CLEC believes that the issue has not been resolved to its satisfaction, the CLEC will commence the mini-audit upon providing the ILEC with 5 business days advance written notice. Each CLEC would be limited to auditing three single measures/sub-measures during the audit year. The audit year shall commence with start of the Initial Audit or an Annual Audit. Mini-Audits may be requested for months including and subsequent to the month in which the Initial Audit or an Annual Audit was initiated.

Mini-Audits will include all systems, processes and procedures associated with the production and reporting of performance measurement results for the audited measure/sub-measure. Mini-Audits will include two (2) months of data, and all parties agree that raw data supporting the performance measurement results will be available monthly to CLECs as described in the Reporting Process section (Section II.c) of this agreement.

No more than three (3) Mini-Audits will be conducted simultaneously unless more than one CLEC wants the same measure/sub-measure audited at the same time, in which case, Mini-Audits of the same measure/sub-measure shall count as one Mini-Audit for the purposes of this paragraph only.

Mini-Audits will be conducted by a third party auditor, selected by the same method as the selection of the auditor for the Initial Audit. The CLEC will pay for the costs of the third party auditor conducting the Mini-Audit unless the ILEC is found to be "materially" misreporting or misrepresenting data or to have non-compliant procedures, in which case, the ILEC would pay for the costs of the third party auditor.' . Parties agree that the issue of whether Pacific Bell is "materially" at fault will be based on the parameters of failure to perform: "materially" at fault means that a reported successful measure changes as a consequence of the audit to a missed measure, or there is a change from an ordinary missed measure to another category, if such exists. Each party to the Mini-Audit shall bear its own internal costs, regardless of which party ultimately bears the costs of the third party auditor.

If, during a Mini-Audit, it is found that for more than 50% of the measures in a major service category Pacific is "materially" at fault (i.e., a reported successful measure changes as a consequence of the audit to a missed measure, or there is a change from an ordinary missed measure to another category, if such exists), the entire service category will be reaudited at the expense of the ILEC. The major service categories for this purpose are:

- Pre-Ordering
- Ordering
- Provisioning
- Maintenance
- Network Performance
- Billing
- Database Updates
- Collocation
- Interfaces

Each Mini-Audit shall be submitted to the CLEC involved and to the Commission as a proprietary document subject to the applicable protection afforded by Commission General Order No. 66 C and California Public Utilities Code Section 583.

Pacific Bell will provide notification to the CLECs of any Mini-Audit requested when the request for the audit is made.

Auditing Plan – GTEC

We adopt the auditing plan proposed for Pacific with the following modifications:

1. The first modification is that GTE's Initial Audit may be conducted in two phases. Phase One of the Initial Audit would include those measures reported prior to the commencement of the Initial Audit. Phase Two of the Initial Audit would commence in January, 2000 and should include all of the additional measurements that were not audited in Phase One.

2. The second modification to the Pacific Bell/CLEC audit proposal is that the mini-audits cannot be requested by the CLEC until the Initial Audit or the Annual Audit has been completed.

DEFINITION OF TERMS

TERM	DEFINITION
Automatic Location Information (ALI)	The feature of E911 that displays at the Public Safety Answering Point (PSAP) the street address of the calling telephone number. This feature requires a data storage and retrieval system for translating telephone numbers to the associated address. ALI may include Emergency Service Number (ESN), street address, room or floor, and names of the enforcement, fire and medical agencies with jurisdictional responsibility for the address. The Management System (E911) database is used to update the Automatic E911 Location Information databases.
Call Blocking	A condition on a telecommunications network where, due to a maintenance problem or an over capacity situation in a part of the network, some or all originating or terminating calls cannot reach their final destinations. Depending on the condition and the part of the network affected, the network may make subsequent attempts to complete the call or the call may be completely blocked. If the call is completely blocked, the calling party will have to re-initiate the call attempt.
Code Opening	Process by which new NPA/NXXs (area code/prefix) are defined, through software translations to network databases and switches, in telephone networks. Code openings allow for new groups of telephone numbers (usually in blocks of 10,000) to be made available for assignment to an ILEC's or CLEC's customers, and for calls to those numbers to be passed between carriers.
Common Channel Signaling System 7 (CCSS7)	A network architecture used to for the exchange of signaling information between telecommunications nodes and networks on an out-of-band basis. Information exchanged provides for call set-up and supports services and features such as CLASS and database query and response.
Common Transport	Trunk groups between tandem and end office switches that are shared by more than one carrier, often including the traffic of both the ILEC and several CLECs.
Completion	The time in the order process when the service has been provisioned and service.
Completion Notice	A notice the ILEC provides to the CLEC to inform the CLEC that the requested service order activity is complete.
Coordinated Customer Conversion	Orders that have a due date negotiated between the ILEC, the CLEC, and the customer so that work activities can be performed on a coordinated basis under the direction of the receiving carrier.
Customer Requested Due Date	A specific due date requested by the customer which is either shorter or longer than the standard interval or the interval offered by the ILEC.
Customer Trouble Reports	A report that the carrier providing the underlying service opens when notified that a customer has a problem with their service. Once resolved, the disposition of the trouble is changed to closed.

DEFINITION OF TERMS

TERM	DEFINITION
Dedicated Transport	A network facility reserved to the exclusive use of a single customer, carrier or pair of carriers used to exchange switched or special, local exchange, or exchange access traffic.
Delayed Order	An order which has been completed after the scheduled due date and/or time
Directory Assistance Database	A database that contains subscriber records used to provide live or automated operator-assisted directory assistance. Including 411, 555-1212, NPA-555-1212.
Directory Listings	Subscriber information used for DA and/or telephone directory publishing, including name and telephone number, and optionally, the customer's address.
DS-0	Digital Service Level 0. Service provided at a digital signal speed commonly at 64 kbps, but occasionally at 56 kbps.
DS-1	Digital Service Level 1. Service provided at a digital signal speed of 1.544 Mbps.
DS-3	Digital Service Level 3. Service provided at a digital signal speed of 44.736 Mbps.
Due Date	The date provided on the FOC the ILEC sends the CLEC identifying the planned completion date for the order.
End Office Switch	A switch from which an end users' exchange services are directly connected and offered.
Firm Order Confirmation (FOC)	Notice the ILEC sends to the CLEC to notify the CLEC that it has received the CLECs service order, created a service request, and assigned it a due date.
Flow-Through	The term used to describe whether a LSR electronically is passed from the OSS interface system to the ILEC legacy system to automatically create a service order. LSRs that do not flow through require manual intervention for the service order to be created in the ILEC legacy system.
Held Order	An order for which the ILEC has issued a FOC, but whose due date has passed without it being completed.
Installation	The activity performed to activate a service.
Installation Troubles	A trouble, which is identified after service order activity and installation, has completed on a customer's line. It is likely attributable to the service activity (within a defined time period).
Inside Wiring	The telecommunications wiring located at a customer's premises that extends beyond the demarcation point.
Interconnection Trunks	A network facility that is used to interconnect two switches generally of different local exchange carriers
Interface Outage	A planned or unplanned failure resulting the unavailability or access degradation of a system.
Jeopardy	A failure in the service provisioning process which results potentially in the inability of a carrier to meet the committed due date on a service order
Jeopardy Notice	The actual notice that the ILEC sends to the CLEC when a jeopardy condition has been identified.

DEFINITION OF TERMS

TERM	DEFINITION
Lack of Facilities	A shortage of cable facilities identified after a due date has been committed to a customer, including the CLEC. The facilities shortage may be identified during the inventory assignment process, or during the service installation process. If no facilities are available, the ILEC will issue a jeopardy.
Local Exchange Routing Guide (LERG)	A Bellcore master file that is used by the telecom industry to identify NPA-NXX routing and homing information, as well as network element and equipment designations. The file also includes scheduled network changes associated with activity within the North American Numbering Plan (NANP).
Local Exchange Traffic	Traffic originated on the network of a LEC in a local calling area that terminates to another LEC in a local calling area.
Local Service Confirmation	OBF term for a FOC
Mechanized Bill	A bill that is delivered via electronic transmission.
Meet Point Billing	A billing arrangement used when two or more LECs jointly provide access to and from an interexchange carrier (IEC) for inter LATA traffic. This arrangement can be Single Bill, where one LEC bills the IEC on behalf of both LECs and remits payment to the other LEC or Multiple Bill, where each LEC bills their portion directly to the IEC.
Missed Commitment Notification	A notice from ILEC to inform CLEC that the committed due date on an order has been missed.
Non-Recurring Charge	A rate charged for a product or a service that is assessed on a one time basis.
NXX, NXX Code or Central Office Code	The three digit switch entity indicator that is defined by the "D", "E", and "F" digits of a 10-digit telephone number within the NANP. Each NXX Code contains 10,000 station numbers.
Permanent Number Portability (also known as Local or Long Term Number Portability)	A network technology which allows end user customers to retain their telephone number when moving their service between local service providers. This technology does not employ remote call forwarding, but actually allows the customer's telephone number to be moved and redefined in the network of the new service provider. The activity to move the telephone number is called "porting".
Physical Collocation	Shall have the meaning set forth in 47 C.F.R. Section 51.5.
Plain Old Telephone Service (POTS)	Refers to basic 2 wire analog residential and business services. Can include feature capabilities (e.g., CLASS features).

DEFINITION OF TERMS

TERM	DEFINITION
Projects	Service requests that exceed the line size and/or level of complexity which would allow for the use of standard ordering and provisioning processes. Generally, due dates for projects are negotiated, coordination of service installations/changes is required and automated provisioning may not be practical.
Provisioning Troubles	A trouble report that is opened for a customer's existing or new service for a trouble identified between the time of the service order creation to the time of order completion. Provisioning troubles that are associated with a CLECs customers include troubles that occur and are reported during the conversion of an ILEC customer to a CLEC.
Query Types	Pre-ordering information that is available to a CLEC that is categorized according to standards issued by OBF, the FCC and/or the CPUC.
Recurring Charge	A rate charged for a product or service that is assessed each successive billing period.
Reject	A status that can occur to a CLEC submitted local service request (LSR) when it does not meet certain criteria. There are two types of rejects:, syntax, which occur if required fields are not included in the LSR:, and content, which occur if invalid data is provided in a field. A rejected service request must be corrected and re-submitted before provisioning can begin.
Repeat Report	Any trouble report that is a second (or greater) report on the same telephone number/circuit ID and at the same premises Address within 30 days. The original report can be any category, including excluded reports, and can carry any disposition code.
Service Group Type	The designation used to identify a category of similar services, .e.g., UNE loops
Service Order	The work order created and distributed in ILECs systems and to ILEC work groups in response to a complete, valid service request.
Service Order Type	The designation used to identify the major types of provisioning activities associated with a service request
Service Request	The transaction sent from the CLEC to the ILEC to order services or to request a change(s) be made to existing services.
Standard Interval	The interval that the ILEC quotes to its customers with respect to how long it will take to provision a service request. These intervals are standardized by specific service type and type of service modification requested ILECs publish these standard intervals in documents used by their own service representatives as well as ordering instructions provided to CLECs. POTS services do not have standard intervals;, their installation intervals are based on force available and workload. They may change as frequently as twice a day.

DEFINITION OF TERMS

TERM	DEFINITION
Subsequent Reports	A trouble report that is taken on a previously reported trouble prior to the date and time the initial report has a status of "cleared".
Summarized Charges	Billing charges that are aggregated on the bill, rather than individually itemized, e.g., local usage minutes on resale or retail calls, which are listed on the bill as "xx" minutes with no call detail.
Tandem Switch	Switch used to connect and switch trunk circuits between and among Central Office switches.
Time to Restore	The time interval from the receipt, by the ILEC, of a trouble report on a customer's service to the time service is fully restored to the customer.
To Be Called Cut	A type of coordinated customer conversion, which involves the CLEC calling the ILEC to signal the ILEC that it should start the customer conversion. (Pacific Bell term)
Trouble Cause Code	A code identifying the known or suspected cause of a trouble condition.
Trouble Disposition	A code identifying the end result of diagnostic and/or repair activities on a customer trouble report.
Usage Data	Data generated in network nodes to identify switched call data on a detailed or summarized basis. Usage data is used to create customer invoices for the calls.
Usage Records	The individual call records created in a switch to report the date, time, duration, calling and called numbers associated with a given call
Virtual Collocation	Shall have the meaning set forth in 47 C.F.R. Section 51.5.

CALIFORNIA OSS OII
PERFORMANCE MEASURES: GLOSSARY OF ACRONYMS

ACRONYM	DESCRIPTION
ADSL	Asymmetric Digital Subscriber Line
ALI	Automatic Line Information (for 911/E911 systems)
AS	Affecting Service (type of trouble condition)
BDT	Billing Data Tape
BRI	Basic Rate Interface (type of ISDN service)
CABS	Carrier Access Billing System
CARE	Customer Repair Center (GTE)
CBSS	Customer Billing Service System (GTE)
CESAR	Carrier Enhanced System for Access Request
CHC	Coordinated "Hot" Cut
CKT	Circuit
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CORBA	Common Object Request Broker Architecture (Pre-ordering standard)
CPE	Customer Premises Equipment
CPUC	California Public Utilities Commission
CRIS	Customer Record Information System
CSB	Customer Service Bureau (PB retail repair center)
CSR	Customer Service Record
DA	Directory Assistance
dB	Decibel
DID	Direct Inward Dialing
DS0	Digital Service 0
DS1	Digital Service 1
DS3	Digital Service 3
E911 MS	E911 Management System
EAS	Equal Access Service
EDI	Electronic Data Interchange
FOC	Firm Order Confirmation
GTE	General Telephone Company
GTT	Global Title Translations
GUI	Graphical User Interface
HDSL	High-bit-rate Digital Subscriber Line
HICAP	High Capacity Digital Service
IEC	Inter-exchange Carrier
ILEC	Incumbent Local Exchange Carrier
I, N, T, C, M	Service Order Types - I (install-GTE), N(new-PB), T(to or transfer-PB), C(change)and M(move-GTE)
ISDN	Integrated Services Digital Network
IW	Inside Wire
LATA	Local Access Transport Area
LERG	Local Exchange Routing Guide
LNP	Local (or Long Term) Number Portability
LOC	Local Operations Center (PB repair and coordination center for CLEC activity)

CALIFORNIA OSS OII
PERFORMANCE MEASURES: GLOSSARY OF ACRONYMS

ACRONYM	DESCRIPTION
LSC	Local Service Confirmation or Local Service Center (PB)
LSMS	Local Service Management System
LSR	Local Service Request
MAC	Missed Appointment Code
NDM	Network Data Mover
NOMC	National Open Market Center (GTE)
NPAC	Number Portability Administration Center
NXX	Telephone number prefix
OBF	Ordering and Billing Forum
OOS	Out of service (type of trouble condition)
OSS	Operations Support System
PB	Pacific Bell
PBX	Private Branch Exchange
PNP	Permanent Number Portability (same as LNP)
PON	Purchase Order Number
POTS	Plain Old Telephone Service
PRI	Primary Rate Interface (type of ISDN service)
SBC	Southwestern Bell Corporation
SCP	Service Control Point
SGT	Service Group Type
SORD	Service Order Retrieval and Distribution (PB service order creation system)
SOT	Service Order Type
SS7	Signaling System 7
STP	Signaling Transfer Point
TBCC	To Be Called Cut (PB)
TN	Telephone Number
UNE	Unbundled Network Element
VGPL	Voice Grade Private Line
xDSL	(x) Digital Subscriber Line

MISSED APPOINTMENT CODES – PACIFIC BELL
MAC – COMPANY REASONS

CO91	No Access to Terminal Or Protector
CO92	No Electrical Permit-Company
CO93	All Other Company Reasons (Tone Back)
CO94	Joint Marketing Contractor
CO95	Civil Unrest, No Access
CO96	National 800 database to Facilities
CO97	Malfunction of Mechanized Service Order Systems i.e. SORD, COSMOS, FACS, MARCH PBOD
CO98	NFWK Service Order Sent To Field and Due Date Missed
CO99	Missed Appointment Window - Senate Bill 101 (System Failure)

COMPANY WORK LOAD

CL71	Installation-Force/Load Imbalance
CL72	Weather Conditions
CL73	Sanctioned Work Stoppage Against Pacific Bell
CL74	Emergency Conditions, Earthquakes, Floods
CL75	800 Service Center Work Load Imbalance
CL79	Missed Appointment Window - Senate Bill 101 (Work Load)

EQUIPMENT SUPPLY

CE81	Lack of Normally Ordered Facility Equipment or Supplies
CE82	Lack of Specially Ordered Facility Equipment or Supplies
CE83	Other Facility Equipment Problems

COMPANY FACILITIES

CF61	Lack of Outside Plant
CF62	Lack of C/O Facilities
CF63	BSW
CF64	Lack of Assignment
CS	Switching Error

STANDARD RING TEST NUMBERS

5E OFC	995-XXXX
DMS OFC	995-XXX-XXXX

MISSED APPOINTMENT CODES – PACIFIC BELL
MAC – CUSTOMER REASONS

NO ACCESS	DESCRIPTION
SA01	None on Prem Left Notice
SA02	Agent/Mgr Not On Prem Left Notice
SA03	Denied Access To Term. On Cust. Prem Left Notice
SA04	Manager Refused Access Left Notice
SA05	Manager Had No Key Left Notice
SA06	Security Type Building
SA07	Unable to Locate Other Designated Party
SA08	Dog/Other Safety Hazard On Premises
SA09	No Response To Call Before Going Number (3 Or More Attempts Made)
SR20	Subscriber In Independent Company No Facility In Independent Company
SR21	No Pole
SR22	No Conduit
SR23	Conduit Plugged
SR24	inc. Full No Spares, Referred to Building Owner, No Authorization./Pre-Authorization to Repair
SR25	No Trench
SR26	Not Authorized To Sign Labor Receipt
SR27	Customer Requests Later Due Date From Tech.
SR28	Building Not Ready
SR29	Electric Power Not Available

CUSTOMER REQUESTS LATER DUE DATES

SL31	Customer Called Company before Tech. Arrived
SL32	Pre-Survey Contact Customer Requests Changing of Due Date

ALL OTHER CUSTOMER REASONS

SO41	Minor Daily Access
SO42	Customer Requested Additional Work
SO43	Customer Gave Wrong Address
SO44	Access Refused
SO45	Access Didn't Know Installation Locations
SO46	Mgr./Owner OK Needed For Exposed Wiring
SO47	Mgr./Owner OK Needed To Drill Hole
SO48	Customer Required To Pay Deposit
SO49	Missed Appointment Window- Senate Bill 101 (Customer Gave Wrong Address)
SO50	Vendor Problem Regarding CPE Term Equipment Either Not Delivered/Installed or Removed

JEOPARDY
MISSED APPOINTMENT CODES – GTE

J - CODE	/ W - CODE	Description
50	00	System Default
51	01	Service Order Problems
52	02	Supplement Pending
53	03	Design Errors
54	04	Distribution Errors
60	10	Assignments
61	11	DORs
62	12	Work Orders
63	13	Installation Problem
71	21	Material Incorrect, Late, or Defective
74	24	Software Incorrect or Incomplete
75	25	Central Office or Field Not Ready/Installation Problems
80	30	OTC - Service Order Problems
81	31	OTC - Supplement Pending
82	32	OTC - IOF Assignment
83	33	OTC - Equipment Problems
84	34	OTC - Not Ready
90	40	Customer - Service Order Problems
91	41	Customer - Supplement Pending
92	42	Customer - No Access
93	43	Customer - Not Ready
94	44	Customer - No IC Response
96	46	Completed Not Reported
97	47	Control Company Not Ready
98	48	National / Local Emergencies
99	49	Customer - Other

The above applies to **SPECIAL SERVICES** only.
GTE does not have **"WHY MISS"** reason codes for retail. It is currently being developed.

DISPOSITION CODES

	PACIFIC BELL		GTE
01	TERMINAL EQUIPMENT	04	NETWORK FACILITIES
02	COMMUNICATIONS EQUIPMENT	05	COIN/COINLESS
02	OTHER STATION EQUIPMENT	05	E911
02	TERMINAL EQUIPMENT	06	OUTSIDE PLANT
03	NETWORK TERMINATING FACILITIES	07	INTEROFFICE FACILITIES
04	OUTSIDE PLANT	09	SERVICE ORDER
05	CENTRAL OFFICE	10	RECORDS
06	CUSTOMER MISUSE	11	CARRIER (FIELD) OR CONCENCENTRATOR
07	TEST OK	12	CENTRAL OFFICE
08	FOUND OK - IN	13	TEST OKAY
09	FOUND OK – OUT	15	CAME CLEAR
10	REFERRED OUT	16	CUSTOMER
12	NON-TELCO PROVIDED	17	EXCLUDE
13	INTER-EXCHANGE CARRIER/INDEPENDENT COMPANY	18	REFERRED OUT
		19	CPE
	PACIFIC BELL CAUSE CODES		
1	TELCO EMPLOYEE		
2	NON-EMPLOYEE		
3	PLANT OR EQUIPMENT		
4	WEATHER		
5	OTHER		
6	UNKNOWN		