Matilda Sanders

From: Peg Griffin [pgriffin@moylelaw.com]

Sent: Wednesday, December 13, 2006 10:05 AM

ORIGINAL

To: Filings@psc.state.fl.us

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Subject: E-filing - Docket No. 000121A-TP

Attachments: CLEC Coalition Response 121306.pdf

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Docket No. and title: In Re: Performance Measurements for Telecommunications Interconnection, Unbundling and Resale
Docket No. 000121A-TP

Filed on behalf of: CLEC Coalition

Number of pages: 12

Document attached: Responses to Action Items

CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
RCA _____
SCR _____
SGA _____
SEC 1
OTH _____

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ORIGINAL

December 13, 2006

Via E-mail

Ms. Blanca Bayo
Florida Public Service Commission
2450 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: CLEC Response to Action Items
Docket No. 000121A

Dear Ms. Bayo:

Attached please find the CLEC Coalition's responses to the following action items:

Attachment A:

Please research and provide copies of the Customer Trouble Report Rate performance measures for ILECs operating in other states with performance measurement plans.

Attachment B:

Determine what issues about the SEEM plan's statistical tests, in relation to its appropriateness in assessing remedies in Force Majeure events, BellSouth and the CLECs can agree on and what issues have disagreement.

Sincerely,

/sVicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/pg
Enclosures
cc: Parties of Record

Attachment A

Action Item Response

1. Please research and provide copies of the Customer Trouble Report Rate performance measures for ILECs operating in other states with performance measurement plans.

Attached please find:

1. SBC (Midwest) has the measure but it excludes installation troubles and repeat troubles. CTTR is in penalty plan with a high priority.

2. Qwest (14 state) has the measure--no unusual exclusions.

3. Verizon New York--does not appear to have the measure.

Resale POTS and UNE Loop and Port Combinations - Maintenance

37.1 Trouble Report Rate Net of Installation and Repeat Reports

Definition:

The number of electronic or manual customer trouble reports net of installation and repeat reports per 100 lines.

Exclusions:

- Trouble reports caused by customer provided equipment (CPE) or wiring.
- All disposition "11", "12", ~~and~~ "13" and "14" trouble reports (excludable reports).
- Trouble reports included in PM 35.
- Trouble reports included in PM 41
- Trouble reports for ISDN products
- Official Company Services from Retail.

Business Rules:

CLEC and SBC Midwest repair reports are entered into and tracked in the trouble management system. Reports are counted in the month they post as closed in the trouble management system..

Levels of Disaggregation:

~~Geographic~~

POTS

- Business class of service
- Residence class of service

UNE-P

~~Business class of service~~
~~Residence class of service~~

Calculation:

(Total number of customer trouble reports net of installation and repeat reports) ÷ (Total lines in service ÷ 100)

Report Structure:

Reported for -

- CLEC
- All CLECs
- SBC Midwest
- SBC Midwest Affiliate

—Exhibit 1

SBC MIDWEST PERFORMANCE MEASUREMENT USER GUIDE
Version 2.50d

Final Redlined Version 2.0d for 2005 6MR Filings

Measurement Type:

	IL/IN/MI/WI	OH
Tier 1	———Remedied	High
Tier 2	Remedied	High

Benchmark:

- POTS – Parity with SBC Midwest Retail, Business and Residence respectively.
- UNE-P – Parity with SBC Midwest Retail, Business and Residence combined~~respectively~~.

Qwest.

Spirit of Service

Service Performance Indicator Definitions (PID)

14-State 271 PID Version 8.1

MR-8 – Trouble Rate

Purpose: Evaluates the overall rate of trouble reports as a percentage of the total installed base of the service or element.	
Description: Measures trouble reports by product and compares them to the number of lines in service. • Includes all trouble reports closed during the reporting period, subject to exclusions specified below. • Includes all applicable trouble reports, including those that are out of service and those that are only service-affecting.	
Reporting Period: One month	**Unit of Measure**: Percent
Reporting Comparisons: CLEC aggregate, individual CLEC and Qwest Retail results	**Disaggregation Reporting**: Statewide level.
Formula: [(Total number of trouble reports closed in the reporting period involving the specified service grouping) ÷ (Total number of the specified services that are in service in the reporting period)] x 100	
Exclusions: • Trouble reports coded as follows: – For products measured from MTAS data, trouble reports coded to disposition codes for: Customer Action; Non-Telco Plant; Trouble Beyond the Network Interface; and Miscellaneous – Non-Dispatch, non-Qwest (includes CPE, Customer Instruction, Carrier, Alternate Provider). – For products measured from WFA data trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE). • Subsequent trouble reports of any trouble before the original trouble report is closed. • Information tickets generated for internal Qwest system/network monitoring purposes. • Trouble reports on the day of installation before the installation work is reported by the technician/installer as complete. • Records involving official company services. • Records with invalid trouble receipt dates. • Records with invalid cleared or closed dates. • Records with invalid product codes. • Records missing data essential to the calculation of the measurement per the PID.	

MR-8 – Trouble Rate (continued)

Product Reporting:	Standards:
• Resale	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Qwest DSL	Parity with Qwest DSL service
Primary ISDN	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• Unbundled Network Element – Platform (UNE-P) (POTS)	Parity with like retail service
• Unbundled Network Element – Platform (UNE-P) (Centrex 21)	Parity with retail Centrex 21
• Unbundled Network Element – Platform(UNE-P) (Centrex)	Parity with retail Centrex
• Line Splitting	Parity with retail Qwest DSL
• Loop Splitting NOTE 1	Diagnostic
• Line Sharing	**CO:** Parity with Qwest DSL
	All Other States: Parity with RES and BUS POTS
• Sub-Loop Unbundling	**CO:** Parity with retail ISDN-BRI
	All Other States: Diagnostic
• LIS Trunks	Parity with Feature Group D (aggregate)
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with retail DS1 Private Line Service
UDIT – Above DS1 level	Parity with retail Private Lines above DS1 level
Dark Fiber – IOF	Diagnostic
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS
Non-loaded Loop (2-wire)	Parity with retail ISDN BRI
Non-loaded Loop (4-wire)	Parity with retail DS1 Private Line
DS1-capable Loop	Parity with retail DS1 Private Line
xDSL-l capable Loop	Parity with retail Qwest IDSL
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	Parity with retail Qwest DSL
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate services (aggregate)
Dark Fiber – Loop	Diagnostic
• E911/911 Trunks	Parity with retail E911/911 Trunks
• Enhanced Extended Loops (EELs) – (DS0 level)	Diagnostic
• Enhanced Extended Loops (EELs) – (DS1 level)	Parity with retail DS1 Private Line
• Enhanced Extended Loops (EELs) – (DS3 level)	Diagnostic

PERFORMANCE ASSURANCE PLAN

VERIZON NEW YORK INC.

March 2003

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Table A-1-2: Unbundled Network Elements Platform - Mode of Entry Weights

PO	Pre-Ordering	Weight
PO-1-01-6020	Customer Service Record – EDI	2
PO-1-03-6020	Address Validation –EDI	2
PO-2-02-6020	**OSS Interface Availability - Prime - EDI**	**5**
PO-1-01-6030	Customer Service Record - CORBA	2
PO-1-03-6030	Address Validation - CORBA	2
PO-2-02-6030	**OSS Interface Availability - Prime - CORBA**	**5**
PO-1-01-6050	Customer Service Record - Web GUI	2
PO-1-03-6050	Address Validation - Web GUI	2
PO-2-02-6050	**OSS Interface Availability - Prime - Web GUI**	**5**
OR	**Ordering**	
OR-1-02-3143	**% On Time LSRC - Flow Thru - Platform - 2hrs**	**10**
OR-2-02-3143	% On Time LSR Reject – Flow Thu - Platform	5
OR-4-11-3000	% Completed Orders with Neither a PCN or BCN Sent	5
OR-4-16-3000	**% On Time PCN - 1 Business Day**	**5**
OR-4-17-3000	% On Time BCN - 2 Business Day	5
OR-5-03-3000	% Flow Through - Achieved – POTS	5
OR-6-03-3143	% Accuracy - LSRC – Platform	5
OR-1-04-3143	% OT LSRC -No Facil Check(Elec.-No Flow Thru) -Platform	5
OR-1-06-3143	% OT LSRC/ASRC -Facil Ck(Elec.-No Flow Thru) -Platform	2
OR-2-04-3143	% OT LSR Rej.-No Facil Ck (Elec.-No Flow Thru) -Platform	2
OR-2-06-3143	% OT LSR/ASR Rej. -Facil Ck(Elec.-No Flow Thru) -Platform	2
PR	**Provisioning**	
PR-3-01-3140	**% Completed in 1 Day (1-5 Lines - No Disp) - Platform**	**5**
PR-4-05-3140	**% Missed Appointment- VZ - No Dispatch - Platform**	**20**
PR-4-04-3140	**% Missed Appointment – VZ - Dispatch - Platform**	**10**
PR-4-02-3100	**Average Delay Days - Total – POTS**	**15**
PR-5-01-3140	% Missed Appointment - Facilities - Platform	5
PR-5-02-3140	% Orders Held for Facilities > 15 days - Platform	5
PR-6-01-3121	**% Installation Troubles within 30 days - Platform**	**10**
MR	**Maintenance & Repair**	
MR-1-01-2000	Avg. Response Time - Create Trouble	2
MR-1-06-2000	Avg. Response Time - Test Trouble (POTS only)	2
MR-3-01-3144	**% Missed Repair Appointments - Loop - Platform - Bus**	**10**
MR-3-02-3144	% Missed Repair Appointments - CO Platform - Bus	10
MR-4-02-3144	Mean Time to Repair - Loop Trouble - Platform - Bus	5
MR-4-03-3144	Mean Time to Repair - CO Trouble - Platform - Bus	5
MR-4-06-3144	% Out of Service > 4 Hours – Platform - Bus.	5
MR-4-07-3144	% Out of Service > 12 Hours – Platform - Bus.	5
MR-4-08-3144	**% Out of Service > 24 Hours - Platform - Bus**	**5**
MR-3-01-3145	**% Missed Repair Appointments - Loop -Platform - Res**	**10**
MR-3-02-3145	% Missed Repair Appointments - CO - Platform - Res	10
MR-4-02-3145	Mean Time to Repair - Loop Trouble - Platform - Res	5
MR-4-03-3145	Mean Time to Repair - CO Trouble - Platform - Res	5
MR-4-06-3145	% Out of Service > 4 Hours – Platform – Res.	5
MR-4-07-3145	% Out of Service > 12 Hours – Platform - Res.	5
MR-4-08-3145	**% Out of Service > 24 Hours – Platform - Res**	**5**
MR-5-01-3140	**% Repeat Reports w/in 30 days - Platform**	**10**
BI	**Billing**	
BI-1-02-2030	% DUF in 4 Business Days	5
	Total Weights For UNE Platform MOE	257

Action Item:
Determine what issues about the SEEM plan's statistical tests, in relation to its appropriateness in assessing remedies in Force Majeure events, BellSouth and the CLECs can agree on and what issues have disagreement.

Agreement:

1. The parties agree that the 2 sample statistical test used in SEEM attempts to separate assignable cause variations from random process variability in the populations by using the difference between the samples.

2. The parties agree that in a Force Majeure event the normal random variation in a process probably increases.

3. During a force majeure event the truncated z-score process difference variation will very likely be larger than the truncated z-score process difference variation under normal operating conditions.

4. The parties agree that, outside of Force Majeure, there are events that occasionally occur which falsely indicate a systemic event and BellSouth will be assessed remedies (Type I error). Furthermore, there are events that occasionally occur which falsely indicate random variation (Type II error). BellSouth will not be assessed remedies. The BCV methodology in SEEM is constructed to equate the probabilities of these two classes of errors.

5. The parties agree that when the statistical test in the SEEM plan indicates failure under normal operating conditions, that the plan will automatically assign remedies as if the assignable variation is an indication of a systemic problem in the process. Furthermore, the parties agree that when the statistical test in the SEEM plan indicates anything other than failure under normal operating conditions, that the test will automatically assign no remedies as if the assignable variation is an indication of random variation in the process.

6. The statistical test used in SEEM assumes that there is no difference between wholesale and retail performance distribution parameters (null hypothesis) and tests this assumption based on collected data. The statistical test is designed to declare failure only if the difference between wholesale and retail performance distribution parameters is significant, as defined by a measure of materiality which is based on business judgment (e.g., delta) (alternative hypothesis).

The CLECs believe the following are true; BellSouth does not necessarily believe they are true:

1. The usual statistical definitions and theorems apply both during normal times and during a force majeure event.

2. If the underlying distributions of the wholesale and retail process are the same (no actual discrimination), then an increased probability of random variation during a force majeure event will in turn decrease the probability that the SEEM statistical test will declare failure,

3. If the underlying distributions of the wholesale and retail process are not the same due to discrimination or any other cause, then an increased probability of random variation during a force majeure event will in turn decrease the probability that the SEEM statistical test will declare failure,

4. Factors during both a force majeure event and during normal operating conditions can affect Bell South and CLEC customers differently. However, SEEM assumes that statistically significant differences of averages are due to differences in process between Bell South and CLEC customers. Furthermore, if there is no discrimination, then the *average* retail and *average* wholesale performance should be the same, even under the conditions of a force majeure.

Summary

Parity metrics should continue to be evaluated by SEEM methodology and remedies levied even during a force majeure event[1] because the usual statistical definitions and theorems apply both during normal conditions and during a force majeure event.[2]

During normal conditions we assume that telecommunication processes are managed in a reasonably effective way by an ILEC. During a force majeure event the effectiveness of the management of the process naturally decreases; therefore, the variance of both the retail and wholesale performance numbers will very likely increase.[3] Although there may be performance differences for individual customers, if there is no discrimination, then the *average* retail and *average* wholesale performance should be the same, even under the conditions of a force majeure.[4] However, during a force majeure, due to the inherently greater variance, the actual difference between average retail and wholesale performance becomes harder to discern. This is, however, not a reason to abandon the SEEM methodology.[5]

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[1] See agreement 1.
[2] See CLEC statement 1
[3] See agreements 2 and 3.
[4] See CLEC statement 4
[5] See CLEC statement 1.

The CLECs contend that the SEEM methodology responds correctly and gracefully to the increased variance during force majeure by decreasing the likelihood of declaring a metric as failed [6], but still detecting discrimination if it is significant and material.[7] To see this we first note that the SEEM methodology evaluates a Z statistic for each cell. This statistic is a quotient whose numerator is the difference of wholesale average (*W*) and retail average (*R*) performance and whose denominator is the standard error (*SE*):

$$Z = \frac{W - R}{SE} .$$

The standard error in the denominator increases with increasing variance of the retail and/or wholesale data. In SEEM the difference of wholesale and retail performance averages in the numerator is set to zero when the wholesale performance is better than retail, but its value is retained when retail is better than wholesale. This is the truncation process.[8] Thus, if the numerator remains constant, then increased standard error, due to increased variability in the data, causes the value of the truncated Z statistic to decrease.[9] This decrease results in a decrease in the likelihood of failure. Alternatively, if the standard error increases, due to increased variability of the data, then the numerator (difference in performance) can increase while keeping the Z statistic constant. Hence the likelihood of failure remains the same even though the measured performance difference increased. Thus, the increased variability, at the cell level, of the less well-controlled process during a force majeure event allows for a greater difference in performance before a failure is declared.[10] However, if the wholesale and retail performance difference (numerator of Z) becomes large enough to dominate the increased standard error variability (denominator of Z), a failure will be declared as required.[11] In this manner the SEEM methodology will continue to detect significant difference between retail and wholesale performance, but will not declare failure unless the "signal" for the performance difference is very strong compared to the "noise" variability of the reduced efficiency process.

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[6] See CLEC statements 2 and 3.
[7] See agreement 6.
[8] The individual cell truncated Z statistics are monotonically combined, in a way that accounts for their size (transaction number), to form the overall truncated Z for the metric.
[9] Unless it was truncated to zero, in which case Z does not change.
[10] Compared to normal conditions.
[11] See agreement 6.