



Date: October 9, 2003

To: Illinois Commerce Commission Staff

From: SBC Illinois

Subject: October 2003 SBC Illinois Report to ICC Staff on Key PMs

This document provides the seventh monthly report to the Illinois Commerce Commission ("ICC") Staff on Key PMs. Included below is a summary of the current status for each PM SBC Illinois committed to report on to the ICC Staff. On the following pages are updated explanations and statuses for each of the submeasures that continue to be reported (performance has not met or exceeded the standard of comparison for two consecutive months subsequent to January 2003 results).

Key PM's Summary Table

Performance Measurement	Status	Date
PM 13-01	Closed	July 1
PM 13-02	Closed	October 1
PM 13-03	Closed	July 1
PM 13-05	Open	
PM 17-02	Closed	August 1
PM 17-03	Closed	August 1
PM 17-04	Open	
PM 17-05	Closed	August 1
PM 37-01	Closed	October 1
PM 37-04	Closed	April 1
PM 55-01.1	Closed	July 1
PM 55-01.3	Closed	April 1
PM 65-06	Open	
PM 65-03	Closed	August 1
PM 65-08	Open	
PM 66-03	Closed	April 1
PM 67-03	Closed	April 1

Please direct any comments or questions on this document to SBC Illinois Regulatory Staff, or to Jim Ehr, Director - SBC Midwest Performance Measurements, at (847) 248-4375 or JE2471@SBC.COM.

Issue: Key PMs Requiring Improvement – PM 13-05 Order Process % Flow Through – LSNP.

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:
 - 1.1. A system error was identified that prevented service order file processing for some LSNP orders and caused LSNP to fall below parity in July. A coding correction was implemented in August and enabled LSNP flow through results for August to exceed parity.

2. The corrective actions being taken for each of those PMs:
 - 2.1. A new internal organization has been created to monitor and correct errors that impact flow through performance. This organization is responsible for daily monitoring of performance as well as root cause analysis. It will also manage work items needing attention across appropriate work groups to resolve system deficiencies that result in order fall out.
 - 2.2. A cross-functional team consisting of IT and Business representation has been assembled to meet weekly. The objective of this team is to analyze system error and stored in error conditions across products that require more in-depth analysis and creative approaches to preventing or reducing the errors. The conditions include unexpected USOC/FID data on the CSR, embedded-based listing or address formatting errors, and various transaction failures. Proposed mechanized solutions to preempting or reducing these fall out conditions will be worked through the Change Management and Defect Management processes.

3. The schedule for those corrective actions to be completed:
 - 3.1. Corrective actions implemented are part of an ongoing production process. The actions taken will improve performance, all other factors held constant. However, as ordering scenarios change so could the flow through performance. SBC expects any new issues affecting flow-through performance to be identified and resolved more quickly, resulting in higher and more consistent flow-through performance over time.

4. As a result of the “passing” performance results reported for the last two months, PM 13-02 will no longer be included in this report effective with the next version to be provided to the ICC Staff on November 3, 2003.

PM's	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 13-02				
June	6586	94.44	96.13	No
July	5912	97.41	96.66	Yes
August	4971	97.08	96.13	Yes
PM13-05				
June	1044	97.32	96.13	Yes
July	1317	90.74	96.66	No
August	1131	98.94	96.13	Yes

Issue: Key PM Requiring Improvement – PM 17-04, Billing Completeness

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:
 - 1.1. An issue has been identified where performance on Lineshare orders generated for both SBC's Affiliate and for CLECs has been calculated from a different, later "available for Billing" date and time (the start of the interval calculation) than that used for UNE-P wholesale orders. As a result, several days were excluded from the interval for the Lineshare orders. For these orders, the date and time the order was "available for billing" in CABS was being used as the start point of the interval, instead of the date and time the order is "available for billing" in ACIS. Using the date and time the order is available for billing" in ACIS encompasses the entire billing completion process (ACIS completion in addition to CABS completion).
 - 1.2. This issue resulted in overstated SBC Affiliate performance results, which predominantly reflect (greater than 90%) Linesharing order activity, while Linesharing is a small subset of wholesale orders. Under the IL Remedy Plan, the parity comparison was made to the better of SBC Affiliate or SBC Retail, and earlier this year overstated performance had resulted in the comparison being made to SBC Affiliate results.
 - 1.3. The UNE-P and Lineshare order process is serial, not parallel as in other regions. The ACIS order must first update the ACIS CSR (reach ACIS "3U" status) before the CABS order can be generated. The interval for PM 17 is measured from "available for billing" in ACIS (ACIS "3C" status) to CABS posting. The comparison had been to either SBC Retail or the SBC Affiliate (SBC Affiliate orders primarily Lineshare only) for all order types.
 - 1.4. Coincident with implementation of the six-month review changes to disaggregate PM 17, an additional performance reporting issue was identified that has resulted in underreporting of previous wholesale and retail performance on PM 17. Prior to April 2003 results, the incorrect Bill Cycle Date was used in instances where the date of completion of the order in the ordering system was between the Bill Date and the Bill Cycle Date for the account. Orders that complete on or after a Bill Date are not considered for inclusion in the bill cycle associated with that Bill Date, and are appropriately compared to the compared to the following month's Bill Cycle Date (where non-recurring charges and usage resulting from the order would first appear on the account's bill). This issue was addressed for the CABS portion of PM 17 results with April 2003 results going forward, and the ACIS portion of PM 17 results was addressed with May results reported June 2003 going forward. Results for January through April 2003 were restated on July 7th.
 - 1.5. While June and July results showed PM 17-04 wholesale performance to be within one percentage point of the retail compare, statistical parity had not been achieved. With August results, wholesale performance declined to 95.25%, compared to retail performance of 98.02%. Upon investigation of this performance decline, SBC Illinois determined that certain service orders issued to implement line splitting LSR's submitted by CLECs were incorrectly reported as Resale orders in PM 17-04, rather than UNE orders in PM 17-05. August was the first of the six months this PM has been reported where the impact of this miss-categorization of orders was noticeable. In August 1,034 orders were reported in Resale that should have been reported in UNE. All previous months had volume below 250 (and an average of 119). This issue will be corrected with September 2003 results to be reported October 20, 2003. Recalculation of August 2003 results, properly "bucketing" these orders, results in PM 17-04 performance increasing to 98.09% against the Retail compare of 98.02%, meeting the parity

standard. The additional records included in the UNE submeasure result in 98.49% UNE orders posted to billing in a timely fashion, continuing to exceed the parity standard.

2. The corrective actions being taken for each of those PMs:

- 2.1. Programming corrections have been implemented to use the proper start date and time for calculation of the interval for wholesale and SBC Affiliate Linesharing orders. The anticipated reduction in reported performance for these orders is expected to impact SBC Affiliate results significantly, while having little to no obvious effect on reported wholesale results.
- 2.2. Coding change will be implemented with September 2003 results to address the proper categorization of UNE orders issued for Line Splitting LSRs. SBC Illinois anticipates PM 17-04 will be in parity for September, as it would be in August with these orders properly categorized.

3. The schedule for those corrective actions to be completed:

- 3.1. Implementation of the programming changes to use the proper start date and time for wholesale and SBC Affiliate orders occurred with March 2003 results. March 2003 results also reflect the implementation of the 6 Month Review V1.9 changes.
- 3.2. Correction for the Line Splitting UNE orders is scheduled for September 2003 results.

4. The current and most recent three months of performance results for PM 17-04:

- 4.1. Wholesale continues to perform at a high level for this submeasure. Each of the monthly results below shows wholesale performance within 1% of the standard. Wholesale continues to look for additional areas of improvement to further increase overall results.
- 4.2. As discussed above, analysis of PM 17-04 performance identified a coding issue. Were that coding issue to be corrected for August 2003 through restatement of results, wholesale performance would be 98.09%, and would be in parity.

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 17-04 – Resale				
June	10200	97.53	97.98	No
July	8917	97.38	98.27	No
August	8576	95.25	98.02	No

Issue: Key PMs Requiring Improvement – PM 37-01, POTS Residence

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:
 - 1.1. The primary cause for reported performance failing to meet the parity standard for both Resold POTS Residence trouble report rates is evident in the performance results for the same disaggregations of PM 37.1. PM 37.1 excludes repeat reports and installation reports, per agreement with the PM collaborative, and is the trouble report rate measure that is subject to remedy. SBC Illinois has consistently met the submeasures of PM 37.1. SBC Illinois has determined it should be expected that CLECs would experience a higher trouble report rate than SBC retail when including I-cases in the results due to the ratio of orders (the base on which an installation trouble report can be reported) to the installed base of lines. In essence, CLECs are generating proportionately more service orders than SBC Retail when contrasted to the current installed base of lines, and therefore a proportionately higher rate of installation trouble reports (when compared to installed base) is expected to impact the trouble report rate measure.
 - 1.2. Since the ratio of orders to installed lines is significantly higher for wholesale than SBC retail (see table below), it is expected, assuming parity of installation trouble reports (which is the case; over the past three months all submeasures of PM 35 have been in parity except for one submeasure in one month (23 of 24 results in parity)), that the number of installation trouble reports would be proportionately larger for wholesale compared to SBC retail when all other factors are held constant. It is important to understand that, while SBC is working to manage the incidence of installation trouble reports to the lowest level reasonable, the ratio of order volume to installed base of lines (significantly greater for wholesale than SBC retail) is expected to result in a proportionately greater number of installation trouble reports, and hence a greater impact on wholesale results for PM 37 than on SBC retail results.

April/May/June 2003 Orders Volume versus Installed Base			
	Order Count from PM 35	Installed Line Count from PM 37	Ratio Orders: Lines
POTS – Residence			
June	4948	12975	0.381
July	4785	11515	0.416
August	3853	10554	0.365
Retail POTS Residence			
June	225428	3222159	0.070
July	251462	3196579	0.079
August	246293	3161859	0.079
			ratio - 5.4 times greater June ratio - 5.3 times greater July ratio_4.6 times greater August

2. The corrective actions being taken for each of those PMs:

- 2.1. Even though it is to be expected that installation trouble reports will be proportionately more common in wholesale results for PM 37 than in SBC Retail results, SBC Illinois is providing additional scrutiny to new wholesale service order requests. SBC Illinois will take wholesale service orders identified by the system as no fieldwork, and in key wire centers dispatch out on these orders on the due date early in the day. It is SBC Illinois' expectation that any bad plant condition/facility issues will be cleared on the due date. This preferential treatment for wholesale orders is expected to help offset the expected, proportionately higher number of installation trouble reports included in PM 37, and bring performance closer to, or into, parity with SBC Retail.
- 2.2. PM35-02 was out of parity for the month of February, 2003 due in part to the cessation of dispatching out on the no field work orders in mid-January. SBC Illinois found that the decision to do so was negatively impacting this disaggregation. In mid-March, SBC Illinois resumed testing and dispatching out on no field work orders in key wire centers. PM35-02 was back in parity for March 2003.
- 2.3. SBC Illinois' trouble report rate performance is solid. Among the eight disaggregations of data reported for PM 37 (Trouble Report Rate) and PM 37.1 (Trouble Report Rate Net of Installation and Repeat Reports), Illinois Bell fell short of parity for only PM 37-01 (Trouble Report Rate – Resale POTS Residence).
- 2.4. The Resale POTS Residence trouble report rate typically lies at 1.5% to 3%, yet SBC Illinois has been unable to achieve parity for PM 37-01 (Trouble Report Rate – Resale POTS Residence). The minimal disparity is generally the result of mathematical skewing caused by "I-cases" (i.e., provisioning trouble reports) and other types of reports. Other measures' results demonstrate that SBC Illinois' performance is more accurately portrayed absent this skewing effect. These measures are PM 37.1-01 (Trouble Report Rate Net of Installation and Repeat Reports – Resale POTS Residence), PM 35-01/02 (Percentage Trouble Reports Within 30 Days (I-30) of Installation – Resale POTS Residence – FW/NFW) and PM 41-01 (Percentage of Repeat Reports – Resale POTS Residence). PM 37.1 was developed at the request of the CLEC's from the 2001 PM Collaborative to better reflect the trouble report rate. At that time, the CLEC's agreed to remedies on PM37.1 and to make PM37 diagnostic. PM37.1 mirrors PM37 except for the inclusion of subsequent reports and the exclusion of Installation and Repeat reports. As the table below indicates, the results for each of these submeasures demonstrate parity performance.

PM	Month	CLEC	AIT	Z-Value	Parity
37-01	June, 2003	2.73	2.25	3.66	No
37-01	July, 2003	3.11	3.09	0.09	Yes
37-01	August, 2003	2.67	2.54	0.85	Yes
37.1-01	June, 2003	1.48	2.28	-6.03	Yes
37.1-01	July, 2003	2.03	3.41	-7.99	Yes
37.1-01	August, 2003	1.71	2.63	-5.83	Yes
35-01	June, 2003	3.96	10.76	-7.79	Yes
35-01	July, 2003	4.96	14.69	-9.07	Yes
35-01	August, 2003	5.65	13.00	-6.71	Yes

PM	Month	CLEC	AIT	Z-Value	Parity
35-02	June, 2003	3.96	5.63	-4.34	Yes
35-02	July, 2003	3.29	6.64	-8.12	Yes
35-02	August, 2003	3.62	6.69	-6.57	Yes
41-01	June, 2003	3.95	10.63	-4.07	Yes
41-01	July, 2003	3.07	11.36	-4.94	Yes
41-01	August, 2003	3.19	10.56	-4.03	Yes

3. The schedule for those corrective actions to be completed:

3.1. The process described above was implemented in March 2003.

4. The current and most recent three months of performance results for those measures:

4.1. As a result of the "passing" performance results reported for the last two months, PM 37-01 will no longer be included in this report effective with the next version to be provided to the ICC Staff on November 3, 2003.

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 37-01				
June	12975	2.73	2.25	No
July	11515	3.11	3.09	Yes
August	10554	2.67	2.54	Yes

Issue: Key PMs Requiring Improvement – PM 65-03, Trouble Report Rate – DSL loops – line sharing; PM 65-06, Trouble Report Rate – BRI loop with test access; and PM 65-08, Trouble Report Rate – DS1 loop with test access.

SBC Action Plan:

1. The identified causes of performance that does not meet the parity or benchmark standard:
 - 1.1. A primary cause for reported performance for PM 65 – Trouble Report Rate submeasures for DSL Loops with Line Sharing, BRI Loops and DS1 Loops that differs from the results reported for the same submeasures of PM 65.1 is that PM 65.1 excludes repeat reports and installation reports. Per agreement with the PM collaborative PM 65.1 is the trouble report rate measure that is subject to remedy. SBC Illinois has determined it should be expected that CLECs would experience a higher trouble report rate than SBC retail when including I-cases in the results due to the ratio of orders (the base on which an installation trouble report can be reported) to the installed base of circuits. In essence, CLECs are generating proportionately more service orders than SBC Retail when contrasted to the current installed base of circuits, and therefore a proportionately higher rate of installation trouble reports (when compared to installed base) is expected to impact the trouble report rate measure.
 - 1.2. Since the ratio of orders to installed lines is significantly higher for wholesale than SBC Retail (see example for BRI loops in the table below), it is expected that, assuming parity of installation trouble reports (which is the case; over the past three months the BRI Loop submeasure of PM 59 has been in parity each month), the number of installation trouble reports would be proportionately larger for wholesale compared to SBC retail when all other factors are held constant. It is important to understand that, while SBC is working to manage the incidence of installation trouble reports to the lowest level reasonable, the ratio of order volume to installed base of lines (significantly greater for wholesale than SBC Retail) is expected to result in a proportionately greater number of installation trouble reports, and hence a greater impact on wholesale results for PM 65 submeasures than for the SBC Retail comparison.

April/May/June 2003 Orders Volume versus Installed Base			
	Order Count from PM 59	Installed Circuit Count from PM 65	Ratio Circuits: Lines
UNE BRI Loops June	308	10269	0.030
UNE BRI Loops July	352	10233	0.034
UNE BRI Loops August	124	10067	0.012
Retail ISDN BRI June	334	65347	0.005
Retail ISDN BRI July	343	64619	0.005
Retail ISDN BRI August	321	71768	0.004
			ratio 6.0 times greater June ratio 6.8 times greater July ratio 3.0 times greater August

2. The corrective actions being taken for each of those PMs:

2.1. PM 65-06BRI loop with test access: Even though the issue described above impacts these results, SBC Illinois has taken corrective action to reduce the trouble report rate by focusing on both the provisioning and maintenance process. A team has been set up to evaluate troubles caused by improper installations (I-cases) with emphasis placed on identifying deviations from existing methods and procedures. In June 65.1-08 missed being in parity by four troubles. These four troubles were caused by a common Litespan problem.

2.2. Performance Measure 59-06 for I cases has achieved parity each of the last three months for UNE BRI.

PM	Month	CLEC	AIT	Z-Value	Result	Troubles
59-06	June, 2003	10.06	6.59	1.60	Yes	31
59-06	July, 2003	9.38	9.04	0.15	Yes	33
59-06	August, 2003	16.94	6.23	3.50	Yes	21

2.3. Performance Measure 69-06 for Repeat Reports has achieved parity each of the last three months for UNE BRI

PM	Month	CLEC	AIT	Z-Value	Result	Troubles
69-06	June, 2003	9.17	10.55	-0.44	Yes	11
69-06	July, 2003	11.03	13.22	-0.69	Yes	16
69-06	August, 2003	7.00	13.25	-1.72	Yes	7

2.4. Performance Measure 65.1-06 Report Rate Net I cases and Repeats for UNE BRI. The report rate was adversely affected by cut and damaged cable. 80% of the measured troubles were closed to codes associated with copper and fiber facilities to the subscriber location. 15% of these copper and fiber troubles required the existing facilities to be repaired due to cable damage. These ratios track with the summer months of July and August 2002. August 2003 data is being tracked daily to identify seasonal service issues, which would affect wholesale and not retail results.

PM	Month	CLEC	AIT	Z-Value	Result	Troubles
65.1-06	June, 2003	0.76	0.49	3.58	No	78
65.1-06	July, 2003	0.94	0.60	3.95	No	96
65.1-06	August, 2003	0.72	0.46	3.49	No	72

2.5. PM 65-03 DSL loops – line sharing: For the November results posted on December 20, 2002 corrective action to change the PM implementation was taken: the data sourcing was corrected and the results were subsequently restated for the months June thru October 2002. After review of the results in December, the Network Teams had a clear vision on the level of disparity and are working to improve performance in the following ways:

- Weekly conference calls with the management team on repair commitment performance

- New daily reports showing performance levels on the affected measures and processes
- Re-training of technicians on proper installation and repair procedures
- Development of job aids for those technicians
- Quality check of SBC splitter equipment in central offices
- Quality reviews check of workmanship
- New checklist completed on each non-ASI order by technician
- Managers in turn follow up with their own check list to verify the technician work

2.6. Since this PM includes the ICASE trouble reports the central office team has implemented a remote test prior to due date to identify any miss wiring that may have happened during the provisioning of the Lineshare, this testing will assist in reducing the number of troubles coming in immediately after completion of the service order.

2.7. PM 65-08, DS1 loop with test access: As with the BRI submeasure, a team was established the week of March 31st to evaluate troubles caused by improper installations, with emphasis placed on validating installation test documentation to ensure the proper tests are being performed. PM 65.1, 69 and 58 are in parity for June.

2.8. The team found the trouble report rate for DS1 Loops to be overstated. This was due to the inclusion of Enhanced Extended Loops (EELs) trouble reports in the DS1 Loop disaggregation prior to the separate reporting of EELs effective with April 2003 results reported in May 2003. April results show the EEL services in their own disaggregation. With these EEL troubles out of the DS1 measure PM 65-08 is in parity for April.

3. The schedule for those corrective actions to be completed:

3.1. PM 65-06, BRI loop with test access: Team was formed the week of March 31. Team meets two days a week on departmental conference call to research issues with trouble report rate performance. On hold based on positive parity performance for PM 65.1, 59 and 69 for March, April and May. Since the out of parity for June for 65.1-08 was the result of one common cause which affected four troubles no corrective action is needed. The report rate was adversely affected by cut and damaged cable. 80% of the measured troubles were closed to codes associated with copper and fiber facilities to the subscriber location. 15% of these copper and fiber troubles required the existing facilities to be repaired due to cable damage. These ratios track with the summer months of July and August 2002. August 2003 data is being tracked daily to identify seasonal service issues, which would affect wholesale and not retail results. Ten of the 72 troubles in PM 65.1-06 were caused by a single cable problem. No corrective action is underway at this time as PM 59 and PM 69 are in parity.

3.2. PM 65-08, DS1 loop with test access: Team was formed the week of March 31. Team determined that the reporting of EELs in a separate disaggregation identified that DS1 Loop trouble report rate would be in parity. It is particularly instructive that the discrete disaggregation of the same measure, which exclude I-cases and repeated reports (PM 65.1), show no shortfalls of parity performance for July. The difference from wholesale to standard is less than 1 point for the last four months. Additionally, the I-case & repeated report PM (59 and 69) continue to show parity results. In August PM (59 and 69) continue to show parity, however PM 65.1-08 is out of parity as the retail inventory has increased 50% over July. Investigation is underway to identify the cause of this suspected error.

4. The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 65-06				
June	10269	1.17	.58	No
July	10233	1.42	.75	No
August	10067	.99	.56	No
PM 65-08				
June	4927	2.60	2.03	No
July	5176	4.04	3.05	No
August	5419	3.27	1.75	No