DIRECT TESTIMONY OF SALVATORE FIORETTI

OFFICIAL FILE
I.C.C. DOCKET NO. 00-0238
AI Exhibit No. 1.0
Witness Fioretti
Date late filed Reporter
admitted 8-21-2001

BACKGROUND AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Salvatore Fioretti and my business address is 2000 W. Ameritech Center Drive, 4G48, Hoffman Estates Illinois

Q. What is your current position at Ameritech?

A. I am the Director of Performance Measures. I am responsible for the processes and systems used by Ameritech to measure and report on the performance of its operations support systems ("OSS").

Q. Please describe your educational and work background.

A. I earned a Bachelor of Business degree from Western Illinois University in 1978 and a Masters in Business Administration from the Keller Graduate School, Chicago, Illinois, in 1988.

Prior to assuming my present position in June of 1999, I was the Director of Service-National Accounts from August 1996 to June 1999. In that position, I was responsible for

working with CLEC customers to address and resolve day-to-day operational service issues. I also participated in the development of the performance measurement plans then utilized within Ameritech and presented performance results in face-to-face meetings with AT&T, MCI, and Sprint, as well as with other carriers.

Prior to August 1996, I was a member of Ameritech's Information Technology Group and managed the development and implementation of its OSS and measurement processes and systems. Overall, I have had 22 years experience in telecommunications with Ameritech in network installation and maintenance, staff and information technology positions.

PURPOSE

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to address certain waivers which Ameritech Illinois is requesting in connection with the performance measurement plan which will be implemented in Illinois. First, I will review the requirements of the Commission's SBC/Ameritech Merger Order relative to OSS systems and performance measures (i.e., Conditions 29 and 30). Second, I will provide the basis for Ameritech

Illinois' requested waiver of the technical infeasibility standard for certain of the performance measures. Third, I will describe those measures for which a benchmark, rather than a parity, standard is being proposed.

THE SBC/AMERITECH MERGER ORDER

Q. Please review the requirements of the SBC/Ameritech Merger Order relative to OSS functionality and performance measures.

A. The SBC/Ameritech Merger Order adopted by this Commission contains several conditions relative to Ameritech Illinois' OSS systems. Condition 29 requires Ameritech Illinois to develop a plan for and to deploy integrated Ameritech/SBC OSS systems and interfaces to be made available to CLECs in Illinois. Ameritech Illinois was required to submit a "Plan of Record" for developing and deploying these interfaces within 3 months of the merger closing date. This was followed by a collaborative process, in which Ameritech Illinois worked with the CLECs and Staff to obtain agreement on as many of the issues associated with OSS implementation as possible. This process is concluding, and it will be followed by an arbitration of any remaining contested issues.

Condition 30 requires Ameritech Illinois to establish performance measures and liquidated damages provisions which would be triggered if the Company fails to meet those performance measures. These measures apply to the operation of Ameritech Illinois' OSS systems, and to the actual provisioning and maintenance of services and facilities to the CLECs (e.g., resale and unbundled loop installation intervals). Under Condition 30, the Company is obligated to implement 122 performance measures which SBC agreed to in Texas, unless certain showings can be made.

Q. Please review the Condition 30 requirements in more detail.

A. First, the Commission's order required Ameritech Illinois to work with the Commission Staff and the CLECs in a collaborative process to review the Texas performance measurements and standards/benchmarks. (Merger Order, p. 256). Following this process, Ameritech Illinois was required to file a report detailing the timeline for implementing each of the performance measures, and the reasons why any of those measures were deemed "infeasible" for implementation. (Merger Order, p. 257). The report has been duly filed. The Merger Order then provides that the Commission may grant waivers for infeasible measures.

In addition, the Texas plan was based on a combination of "parity" and "benchmark" standards to assess SBC's performance. Although the Commission ordered Ameritech Illinois to implement this Texas plan, the Commission expressed a preference for the use of parity, rather than benchmark, standards. Where the Company proposes to use a benchmark standard, the Commission placed the burden of proof on Ameritech Illinois to demonstrate that no retail analog exists for that measure:

> "Additionally, all performance measures must be based on comparison to performance that the Joint Applicants provide to their own operations and/or subsidiaries. The burden of proof shall remain on the Joint Applicants to demonstrate that no retail analogs exist and that benchmarks should be substituted. . .." (Merger Order, p. 221).

Q. Have the Condition 30 collaborative proceedings been completed?

A. Yes. Ameritech Illinois, the Commission Staff and interested CLECs met in eight separate sessions for fifteen days over a period from January 6, 2000 to August 17, 2000. Several sub-team conference calls were also held to discuss specific issues. Most of the issues were successfully resolved between the parties. As indicated in Ameritech Illinois' Petition which initiated this proceeding, the only issues in dispute relate to the use of a benchmark,

rather than a parity, standard for certain Firm Order Confirmation ("FOC") measures. Since the filing of the Petition, the parties continued to negotiate this issue and a satisfactory compromise agreement has been reached.

TECHNICAL INFEASIBILITY

Q. Is it technically feasible to adopt all of the 122 Texas performance measures in Illinois?

A. No. There are six Texas measures which Ameritech Illinois has concluded are infeasible. These measures can be divided into two general categories: (1) measures for systems which Ameritech Illinois has not deployed; and (2) measures for products which Ameritech Illinois no longer offers.

Q. Please describe the measures for systems which Ameritech Illinois has not deployed.

A. SBC's Texas measures contain an average response time for a system called the Easy Access Sales Environment ("EASE") (SBC PM #3 EASE Average Response Time). EASE is a proprietary system deployed by SBC, which supports the ordering of POTS residence and business telephone service.

SBC's retail service representatives and wholesale (resale) customers utilize this system.

Ameritech Illinois has not deployed EASE and does not currently offer a system like EASE, which provides direct access to ordering. Instead, the Company provides access to its mechanized ordering functions via an Electronic Data Interchange ("EDI") interface, which has been operational since 1996. It is, therefore, infeasible for Ameritech Illinois to implement SBC PM #3, "EASE Average Response Time".

Ameritech Illinois' ordering performance is captured by other performance measures, which address the EDI interface and the downstream ordering systems which are accessed through EDI. Should Ameritech Illinois deploy EASE or an EASE-like system in the future, Ameritech Illinois would initiate work to revise its performance measures, or add new ones, as appropriate.

Q. Please describe the performance measures for products which Ameritech Illinois no longer offers.

A. SBC's Texas measures contain five items which relate to interim number portability ("INP"). These five measures are as follows:

PM #87	Percentage Installation Completed Within "X" (3, 7, 10) Days - INP
PM #88	Average INP Installation Interval
PM #89	Percentage INP Only I-Reports Within 30 Days
PM #90	Percent Missed Due Dates (INP Only)
PM #116	Percentage of Missed Mechanized INP Conversions

SBC offers INP in some areas and, thus, has five measures that relate to INP performance. In contrast, Ameritech Illinois was among the national leaders in the deployment of Long Term Number Portability ("LNP"). In Illinois, although INP was utilized prior to the widespread availability of LNP, it was discontinued as a product offering in Ameritech Illinois' territory effective June 13, 1999. Thus, there is no INP performance to measure.

Ameritech Illinois will, of course, measure its performance relative to LNP. LNP performance is captured in eleven other measures within the Texas plan and these measures will be implemented in Illinois (i.e., measures #91 through measures #101).

Q. Does Ameritech Illinois request a waiver for these six performance measures?

A. Yes. A waiver is fully supported by the circumstances described above. There was no disagreement among the parties to the collaborative that these six measures satisfied an "infeasibility" standard.

PARITY VS. BENCHMARK

Q. What are the issues in this proceeding?

A. The issues revolve around whether a "parity" or "benchmark" standard should be used to assess Ameritech Illinois' performance for certain wholesale functions.

Q. Please explain what is meant by the terms "parity" and "benchmark" in the context of the performance measures.

A. The terms "parity" and "benchmark" describe two different standards for assessing Ameritech Illinois' performance. A parity standard applies when there is a retail analog for the wholesale function being measured. That is, the Company's wholesale performance is compared to its own retail operations or the retail operations of an affiliate.

For example, Ameritech Illinois installs basic telephone service ("POTS") for its own retail customers and installs essentially identical service for CLECs which resell that service to their end users. Due dates are established for new service installations, for both retail and wholesale customers. To assess Ameritech Illinois' performance in meeting those due dates, missed dates for POTS resale (i.e., wholesale) customers are compared directly to service order missed dates for POTS retail customers, using the same calculations and parameters. Thus, for "parity" measures, Ameritech Illinois compares (through statistical analysis) its performance for CLECs with its performance of the comparable function for its own retail customers or affiliates.

"Benchmarks" apply where there is no reasonable retail analog for the wholesale function. For example, Ameritech Illinois provides CLECs with access to its loops on an unbundled basis; however, Ameritech Illinois does not unbundle loops for itself (it provides end-to-end service to its retail customers). In these instances, an objective measure is established for completion of the operation in terms of seconds, hours, or other appropriate measure of timely performance; and Ameritech Illinois' wholesale performance is compared to those objective measures.

Q. Does the Texas plan contain both parity and benchmark measures?

A. Yes. Of the 122 Texas performance measures, 62 are based on benchmarks. SBC's performance on these processes are measured and compared relative to the benchmark, rather than to a retail counterpart.

Q. Please describe the results of the collaborative process with respect to the parity/benchmark issue.

A. After an extensive review by the Company, Staff and interested CLECs, there was substantial agreement regarding the use of parity and benchmark standards. The parties to the collaborative agreed that 40 of the 62 Texas benchmark measures and parts of two others could be based on benchmarks. The parties agreed to revisit five of these 42 benchmark measures in future collaborative workshops, to determine whether a retail analog has become available. In addition, with respect to two of these measures, the Company and the CLECs have agreed to change the benchmark to impose a more rigorous performance standard on Ameritech Illinois.

For 19 of the remaining benchmark measures, the parties developed and agreed upon a retail analog in order to make a parity approach possible.

Schedule 1 of my testimony lists all the performance measures and indicates whether a benchmark or parity approach will be used. Schedule 2 lists the agreed-upon benchmark measures and provides an explanation as to why a retail analog is not available. Waivers are appropriate for all of these noncontested measures.

In addition, standards have been agreed to for three measures involving Firm Order Confirmations ("FOCs"):

- PM #5 -- Percent Firm Order Confirmations Returned Within "X" Hours for Resale and Unbundled Network Elements.
- PM #6 -- Average Time to Return Firm Order Confirmations for Resale and Unbundled Network Elements.
- PM #94 -- Percent Firm Order Confirmations Returned Within "X" Hours for Local Number Portability.

FIRM ORDER CONFIRMATIONS ("FOCs")

Q. Please explain what a Firm Order Confirmation is.

A. Firm Order Confirmation is one function performed by Ameritech Illinois' OSS systems.

Q. What are OSS systems?

A. OSS systems represent "back office" functionalities. They have been defined as those systems and databases required for: (1) preordering, (2) ordering, (3) provisioning, (4) maintenance and repair, and (5) billing. Incumbent local exchange companies (ILECs) use their own internal systems to support and coordinate these functionalities. Ameritech Illinois provides CLECs with access to these functionalities through interfaces that generally permit electronic processing of intercompany transactions. OSS systems enable the five functionalities described above for both resold services and unbundled network elements like loops.

Q. Please explain the purpose of a FOC.

A. The FOC is a status notice which Ameritech Illinois provides to CLECs as part of the ordering process in the

wholesale environment. Ameritech Illinois' wholesale order interface ("EDI" for electronic orders) and wholesale service representatives (manual orders) check CLEC orders for format and content. The EDI interface translates the CLEC orders from a generic industry standard format into one that is understood by Ameritech Illinois' internal systems. CLEC orders which are improperly formatted, or which do not contain necessary data, are returned to the CLEC with a rejection notice. Orders that are correct and accurate are confirmed. The purpose of the Firm Order Confirmation ("FOC") measures is to assess the amount of time it takes Ameritech Illinois to notify the CLEC that an order has been accepted as accurate and complete.

Q. Is there a counterpart to a FOC within Ameritech Illinois' internal processes?

A. The FOC is, by its nature, unique to the carrier-to-carrier relationship that exists in the wholesale environment. In the retail environment, Ameritech Illinois' order taking and order processing systems function as one integrated whole. Ameritech Illinois' retail representatives prepare and enter orders directly on Ameritech Illinois' own

systems, in a single step. In contrast, CLECs prepare and enter orders on their own systems, but then transfer them to Ameritech Illinois for processing. That requires Ameritech Illinois to take extra steps to translate and perform edit/review checks on the CLECs' orders, and then to issue a FOC to notify them that the order has been accepted.

Q. Do the Texas performance measures contain benchmark standards for FOCs?

A. Yes.

Q. Are those benchmark standards being proposed in the proceeding?

A. Yes, with further modifications.

Q. Please explain the Texas FOC standards in more detail.

A. There are three FOC measures which are based on benchmarks. The first is PM #5 which specifies the percent of FOCs on electronically submitted orders which must be returned to

CLECs within "X" hours, both for resold services and UNEs. For simple residence and business orders and UNE loop orders under 50 loops submitted electronically, the benchmark standard is that 95% of all FOCs must be returned to the CLECs within 5 hours. The 5-hour standard reflects a meld of electronic orders that flow through and electronic orders that require manual processing, as I described previously. Longer time intervals are specified for complex business orders and UNE loop orders over 50 loops. My Schedule 3 describes all of the applicable standards under PM #5 and the other two FOC measures in this proceeding.

Q. Please describe PM #6.

A. PM #6 measures the "average" time it takes Ameritech Illinois to return the FOC to the CLEC. It is not a stand-alone performance measure. It is a diagnostic measure which provides a different perspective on the same Company performance that is assessed directly in PM #5 (for example, it measures the <u>average</u> time that it takes for all simple residence and business FOC confirmations, not just whether 95% are returned within 5 hours). It allows the

Commission and CLECs to assess where Ameritech Illinois is operating in the range of 0-to-5 hours for the 95% of FOCs which must meet the 5-hour standard and the timeliness of the remaining 5% of FOCs that do not have to meet that standard. The Texas plan includes several such diagnostic measures.

The same considerations about benchmark vs. parity apply to PM #6 as to PM #5.

Q. Please describe PM #94.

A. PM #94 measures the percent FOC response within "X" hours for local number portability ("LNP") orders. CLECs separately order LNP when they order unbundled loops which substitute for existing service, when their customers wish to retain their telephone numbers in the new service arrangement. LNP is unique to the wholesale environment. Security, translation and edit/review functions need to be performed for LNP orders that are essentially identical to those I described earlier for the UNE service orders and similar benchmarks are proposed. The only difference is that the cut-off between 5-hour and longer-interval

processing is 20 loops, rather than 50 loops. This is because of the additional complexities associated with FOCs for LNP orders involving multiple loops.

Q. Could Ameritech Illinois establish separate FOC benchmarks for electronic orders which flow through and those which fall to manual processing?

A. Yes. As a result of negotiations between the parties, Ameritech Illinois will modify its FOC measures for electronically received orders to establish two separate categories. One category will be for those orders which are received electronically and flow through, and the other category would be for those orders received electronically that drop for manual intervention. Under the negotiated approach, Ameritech Illinois will commit to a two-hour FOC benchmark on those orders that flow through, while maintaining the benchmark for electronic orders that are processed manually to allow a five-hour FOC interval.

A similar approach has been taken by Bell Atlantic. It should be noted that Ameritech Illinois' proposed FOC intervals are shorter than those offered by Bell Atlantic.

Bell Atlantic established a two-hour benchmark for flow through orders and a 24-hour benchmark for electronically submitted/manually processed orders.

Q. Is use of a benchmark for these three FOC measures appropriate in Illinois?

A. Yes, for all the reasons I stated above. Thus, Ameritech Illinois requests a waiver of the "parity" provisions of Condition 30 for these three performance measures.

CONCLUSION

Q. Does this conclude your testimony?

A. Yes.

LIST OF PERFORMANCE MEASURES

SBC#	FCC#	Measure Name	Benchmark	Parity	Technically Infeasible
1	2	Average Response Time for OSS Pre-Order Interfaces	√		
2		Percent Responses Received within "x" seconds-OSS Interfaces	√		
3		EASE Average Response Time			√
4	19	OSS Interface Availability	√		
5	1	Percent Firm Order Confirmations (FOCs) Returned within "X" Hours	*NO AGREEMENT*		
6		Average Time to Return FOC	*NO AGREEMENT*		
7		Percent Mechanized Completions Returned Within 1 Hour of Completion in SORD	√ [3]		
7.1	4d	Percent Mechanized Completions Returned Within 1 Day of Work Completion	√ [3]		
8		Average Time to Return Mechanized Completions	√ [3]		
9		Percent Rejects	√		
10		Percent Mechanized Rejects Returned within 1 Hour of Receipt of Reject in LASR	√		
10.1		Percent Mechanized Rejects Returned within 1 hour of receipt of LSR from CLEC	√		
10.2		Percent Mechanized Rejects Received Electronically and Returned within 5 hours	√		
10.3		Percent Manual Rejects Received Manually and Returned Within 5 Hours	√		
11		Mean Time To Return Mechanized Rejects	√		
11.1		Mean Time To Return Manual Rejects that are Received Electronically via LEX or EDI	√		
11.2		Mean Time to Return Manual Rejects that are Received thru the Manual Process	√		
15		Percent of Accurate and Complete Formatted Mechanized Bills	√		
16		Percent of Usage Records Transmitted Correctly	√		
18	18	Billing Timeliness (Wholesale Bill)		√	
19		Daily Usage Feed Timeliness	√		
20		Unbillable Usage	√		
34		Count of Orders Canceled After the Due Date Which Were Caused by SWBT		√	
51		Count of Orders Canceled After the Due Date Which Were Caused by SWBT - SPECIALS – Provisioning		√	
55		Average Installation Interval		√	
56	6c	Percent Installations Completed within "X" Days - UNE		√	
64		Count of Orders Canceled After the Due Date Which Were Caused by SWBT - UNE – Provisioning		√	
70	15	Percent Trunk Blockage		√	
71	20	Common Transport Trunk Blockage	√		
72		Distribution of Common Transport Trunk Groups > 2%	√		
75		Percent SWBT Caused Missed Due Dates > 30 Days		√	
77	14	Average Trunk Restoration Interval for Service Affecting Trunk Groups	√		

LIST OF PERFORMANCE MEASURES

SBC #	FCC #	Measure Name	Benchmark	Parity	Technically Infeasible
78		Average Interconnection Trunk Installation Interval		√	
79		Directory Assistance Grade of Service	√		
80		Directory Assistance Average Speed of Answer	√		
81		Operator Services Grade of Service	√		
82		Operator Services Speed of Answer	√		
83		Percent Calls Abandoned	√		
84		Percent Calls Deflected	√		
85		Average Work Time	√		
86		Non-Call Busy Work Volumes	√		
87		Percent Installations Completed within "X" Days Interim Number Portability			√
88		Average INP Installation Interval			√
89		Percentage INP Only I-Reports within 30 Days			√
90		Percentage Missed Due Dates (INP Only)			√
91		Percentage of LNP Only Due Dates within Industry Guidelines	√		
92		Percentage of Time the Old Service Provider Releases the Subscription Prior to the Expiration of the Second 9-Hour (T2) Timer	√		
93		Percentage of Customer Account Restructured Prior to LNP Due Date	√		
94	1	Percent FOCs Received Within "X" Hours	*NO AGREEMENT*		
95		Average Response Time for Non-Mechanized Rejects Returned With Complete and Accurate Codes	√		
96	16	Percentage Pre-Mature Disconnects (Coordinated Cutovers)	√		
97		Percentage of Time SWBT Applies the 10-digit Trigger Prior to the LNP Order Due Date	√		
100		Average Time of Out of Service for LNP Conversions	√		
101		Percent Out of Service < 60 Minutes	√		
105		Percentage of Requests Processed Within 35 Days		√ [1]	
106		Average Days Required to Process a Request		√ [1]	
107	17	Percentage Missed Collocation Due Dates		√ [1]	
108		Average Delay Days for SWBT Missed Due Dates		√ [1]	
109		Percent of Requests Processed Within the Tariffed Timelines		√ [1]	
110		Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs		√ [2]	
111		Average Update Interval for DA Database for Facility Based CLECs		√ [2]	
112		Percentage DA Database Accuracy for Manual Updates	√		
113		Percentage of Electronic Updates that Flow Through the DSR Process Without Manual Intervention		√	
114		Percentage of Premature Disconnects (Coordinated Cutovers)	√ [1]		
115		Percentage of SWBT Caused Delayed Coordinated Cutovers	√ [1]		
116		Percent of Missed Mechanized INP Conversions			√

LIST OF PERFORMANCE MEASURES

SBC#	FCC#	Measure Name	Benchmark	Parity	Technically Infeasible
120		Percentage of Requests Processed Within 30 Business Days (BFR)		√[4]	
121		Percentage of Quotes Provided for Authorized BFRs Within 45 Business Days		√[4]	

√	Represents agreement of the parties.
√[1]	Represents an interim agreement to measure to parity with Ameritech Affiliates and review in June 2000
√[2]	Represents an agreement to measure electronic disaggregations as parity and manual disaggregations as benchmarks
√[3]	Represents an interim agreement of the parties with a change to performance standard to 99% with a review in June 2000
√[4]	Represents an agreement to measure to parity with Ameritech Affiliates and an acknowledgement by Ameritech that the intent of these BFR measurements do not reflect all situations for which BFR's are currently used, but rather the traditional use of the BFR process.
NO AGREEMENT	Does not represent agreement of the parties, this is Ameritech's proposal

AGREED UPON BENCHMARK MEASURES AND EXPLANATION AS TO WHY RETAIL ANALOG IS NOT AVAILABLE

SBC#	Measure Name	Discussion
1	Average Response Time for OSS Pre-Order Interfaces	The average response time for Pre-order transactions is similar to Ameritech's retail response time. The differentiation is essentially in the nature of access because CLECs access via an interface while Ameritech has direct access to the systems. The response time standards established in the Texas business rules are not dissimilar than those associated with Bell Atlantic's standard of parity plus 4 seconds, with some bettering those standards. Four of the six disaggregations in this measure offer benchmarks of six or less seconds. **CLECs agreed to a benchmark as the standard for this measure.** This measure is required by the FCC merger agreement.
2	Percent Responses Received within "x" seconds-OSS Interfaces	The "percent within" measurement requires a different, somewhat longer standard than the average response time measurement, however four of the six disaggregations are for 95% responses in less than sixteen seconds, while another is 95% in less than 25 seconds. The differentiation is essentially in the nature of access because CLECs access via an interface while Ameritech has direct access to the systems. **CLECs agreed to a benchmark as the standard for this measure.**
4	OSS Interface Availability	This measurement represents, in some cases, both the back end legacy systems and the interface itself, while the retail environment does not deal with the CLEC interface. Therefore there is not a retail analog. **CLECs agreed to a benchmark as the standard for this measure.** This measure is required by the FCC merger agreement.
7	Percent Mechanized Completions Returned Within one hour of Completion in ACIS	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's finding that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. **CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This benchmark will be re-evaluated in June.**
7.1	Percent Mechanized Completions Returned Within one Day of Work Completion	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's finding that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. **CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This benchmark will be re-evaluated in June.**

AGREED UPON BENCHMARK MEASURES AND EXPLANATION AS TO WHY RETAIL ANALOG IS NOT AVAILABLE

SBC#	FCC#	Measure Name	Discussion
8		Average Time to Return Mechanized Completions	There is no retail analog for a completion notice since a completion notice is not sent to the retail service center once an order is complete. Ameritech cited the FCC's finding in Bell Atlantic's application for long-distance relief in New York, where they upheld the state commission's finding that "order completion notification lacks a retail analogue." Bell Atlantic 271 Order, 186 n.591. **CLECs proposed and Ameritech accepted a change in the benchmark from 97% to 99% on an interim basis (until June) as a compromise. This measure is a diagnostic measure and will be re-evaluated with 7 and 7.1 in June.**
9		Percent Rejects	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**
10		Percent Mechanized Rejects Returned within 1 Hour of Receipt of Reject in MorTel	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**
10.1		Percent Mechanized Rejects Returned within 1 Hour of Receipt of Reject in of LSR from CLEC	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**

AGREED UPON BENCHMARK MEASURES
AND EXPLANATION AS TO WHY RETAIL ANALOG
IS NOT AVAILABLE

SBC#	FCC#	Measure Name	Discussion
10.2		Percent Mechanized Rejects Received Electronically and Returned within 5 hours	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**
10.3		Percent Manual Rejects Received Manually and Returned Within 5 Hours	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**
11		Mean Time To Return Mechanized Rejects	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**
11.1		Mean Time To Return Manual Rejects that are Received Electronically via LEX or EDI	There is no retail analog for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**

AGREED UPON BENCHMARK MEASURES AND EXPLANATION AS TO WHY RETAIL ANALOG IS NOT AVAILABLE

SBC#	FCC#	Measure Name	Discussion
11.2		*Mean Time to Return Manual* Rejects that are Received through the Manual Process	*There is no retail analog* for a rejection notice since no such rejection notice is sent to Ameritech retail service representatives. Ameritech Service Representatives input service orders directly into the ordering system and not via an interface. Edits in that process stop the retail service representative from inputting the service order at the point of error, rather than rejecting the order. The rejection notice is an interface function reflecting the "carrier to carrier" relationship. Ameritech also cited the FCC's finding in Bell Atlantic, which stated that there are no retail analogs for this function. **CLECs agreed to a benchmark as the standard for this measure.**
15		Percent of Accurate and Complete Formatted Mechanized Bills	There is no retail analog to this function as Ameritech sends very few mechanized bills to its customers in the retail environment. This is a primarily a function which occurs as part of the carrier to carrier relationship. **CLECs agreed to a benchmark as the standard for this measure.**
16		Percent of Usage Records Transmitted Correctly	There are significant differences in the way usage is treated in the retail vs. wholesale environment. Retail Usage is held until the end-user bill is generated, on a monthly basis. Wholesale usage is "transmitted" to the CLEC on a daily basis. Therefore there is no retail analog for this measure. **CLECs agreed to a benchmark as the standard for this measure.**
19		Daily Usage Feed Timeliness	There are significant differences in the way usage is treated in the retail vs. wholesale environment. Retail Usage is held until the end-user bill is generated. Wholesale usage is "transmitted" to the CLEC on a daily basis. CLEC usage is also aggregated from the thirteen Ameritech billing centers and sent to the CLECs as one file each day, which does not happen in the retail environment. Therefore there is no retail analog for this measure. **CLECs agreed to a benchmark as the standard for this measure.**
20		Unbillable Usage	Unbillable usage, by its nature is usage where the party who generated the usage is unknown. This usage may have been generated by either a wholesale or a retail customer, but the owner is indistinguishable and thus the usage will go unbilled. This is a diagnostic measure in Texas business rules. **CLECs agreed to leave this a diagnostic measure and not to set a benchmark as the standard for this measure.**

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SBC#	FCC#	Measure Name	Discussion
71		Common Transport Trunk Blockage	Common transport trunks do not differentiate between Ameritech traffic and Wholesale traffic, and transport all traffic in a common manner between Ameritech offices. Since this measure includes the blockage generated by the aggregate of all of this traffic, retail and wholesale combined, there is no retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
72		Distribution of Common Transport Trunk Groups > 2%	Common transport trunks do not differentiate between Ameritech traffic and Wholesale traffic, and transport all traffic in a common manner between Ameritech offices. Since this measure includes the blockage generated by the aggregate of all of this traffic, retail and wholesale combined, there is no retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
79		Directory Assistance Grade of Service	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
80		Directory Assistance Average Speed of Answer	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
81		Operator Services Grade of Service	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting

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SEC#	FCC#	Measure Name	Discussion
82		Operator Services Speed of Answer	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
83		Percent Calls Abandoned	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
84		Percent Calls Deflected	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
85		Average Work Time	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting
86		Non-Call Busy Work Volumes	Operator Services/Directory Assistance (OS/DA) measurements do not distinguish retail from wholesale traffic. They are reported in the aggregate since the OS/DA operators cannot distinguish wholesale from retail traffic when answering calls. **CLECs agreed to a benchmark as the standard for this measure.** CLECs request that if changes in the network occur to allow for the distinction of calls between wholesale/retail Ameritech will segregate retail and wholesale reporting

AGREED UPON BENCHMARK MEASURES AND EXPLANATION AS TO WHY RETAIL ANALOG IS NOT AVAILABLE

SBC#	FCC#	Measure Name	Description
91		Percentage of LNP Only Due Dates within Industry Guidelines	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
92		Percentage of Time the Old Service Provider Releases the Subscription Prior to the Expiration of the Second 9-Hour (T2) Timer	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
93		Percentage of Customer Account Restructured Prior to LNP Due Date	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
95		Average Response Time for Non-Mechanized Rejects Returned With Complete and Accurate Codes	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
96	16	Percentage Pre-Mature Disconnects (Coordinated Cutovers)	Since the LNP process does not occur in the retail environment, **CLECs agreed to a benchmark as the standard for this measure.**
97		Percentage of Time Ameritech Applies the 10-digit Trigger Prior to the LNP Order Due Date	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
100		Average Time of Out of Service for LNP Conversions	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
101		Percent Out of Service < 60 Minutes	Local Number Portability (LNP) is strictly a wholesale service and does not have a retail analog. **CLECs agreed to a benchmark as the standard for this measure.**
110		Percentage of Updates Completed into the DA Database within 72 Hours for Facilities Based CLECs	Directory database updates are not generated manually for Ameritech retail customers. All flow through as a result of service orders. CLECs agreed to only compare electronic transactions to retail as a comparison. **CLECs agreed to a benchmark as a standard for Manual D/A database updates.**
111		Average Update Interval for DA Database for Facility Based CLECs	Directory database updates are not generated manually for Ameritech retail customers. All flow through as a result of service orders. CLECs agreed to only compare electronic transactions to retail as a comparison. **CLECs agreed to a benchmark as a standard for Manual D/A database updates.**

AGREED UPON BENCHMARK MEASURES AND EXPLANATION AS TO WHY RETAIL ANALOG IS NOT AVAILABLE

SBC#	FCC#	Measure Name	Discussion
112		Percentage of DA Database Accuracy for Manual Updates	CLECs agree that no manual DA database updates occur in Ameritech retail, **and therefore CLECs agreed to a benchmark as the standard for this measure.**
114		Percentage of Premature Disconnects (coordinated cutovers)	CLECs and Ameritech could not agree as to whether there are useful retail analogs to use in the evaluation of coordinated cutovers. **Therefore, CLECs and Ameritech agreed to utilize a benchmark comparison as an interim comparison until June.** NextLink and Ameritech will work together to conduct a study to collect data on useful retail analogs.
115		Percentage of Ameritech Caused Delayed Coordinated Cutovers	CLECs and Ameritech could not agree as to whether there are useful retail analogs to use in the evaluation of coordinated cutovers. **Therefore, CLECs and Ameritech agreed to utilize a benchmark comparison as an interim comparison until June.** NextLink and Ameritech will work together to conduct a study to collect data on useful retail analogs.

FOC MEASURES

PM #5 -- Percent FOCs Returned Within "X" Hours (electronically submitted):

1.	Simple Residence and Business Resale.	
	Processed Electronically	95% within 2 Hours
	Processed Manually	95% Within 5 Hours.
2.	Complex Business Resale (1-200 Lines).	94% Within 24 Hours.
3.	Complex Business Resale (over 200 Lines).	94% Within 48 Hours.
4.	UNE Loops (1-49 Lines).	
	Processed Electronically	95% within 2 Hours
	Processed Manually	95% Within 5 Hours.
5.	UNE Loops (50 Lines and up).	94% Within 48 Hours.
6.	Switch Ports.	
	Processed Electronically	95% within 2 Hours
	Processed Manually	95% Within 5 Hours.

PM #6 -- Average Time to Return FOC [1] (electronically submitted):

1.	Simple Residence and Business Resale. (disaggregated by electronically and manually processed)	Hours.
2.	Complex Business Resale (1-200 Lines).	Hours.
3.	Complex Business Resale (over 200 Lines).	Hours.
4.	UNE Loops (1-49 Lines). (disaggregated by electronically and manually processed)	Hours.
5.	UNE Loops (50 Lines and up).	Hours.
6.	Switch Ports. (disaggregated by electronically and manually processed)	Hours.

[1] These are diagnostic measures; no benchmarks are associated with them.

FOC MEASURES

PM #94 -- Percent FOCs Returned Within "X" Hours For LNP (electronically submitted):

1.	Simple Residence and Business Resale LNP Only (1-19 Lines).	
	Processed Electronically	95% within 2 Hours
	Processed Manually	95% Within 5 Hours.
2.	LNP With Loop (1-19 Loops).	
	Processed Electronically	95% within 2 Hours
	Processed Manually	95% Within 5 Hours.
3.	Simple Residence and Business Resale LNP only (Over 20 Lines).	95% Within 48 Hours.
4.	LNP with Loop (Over 20 Lines).	95% Within 48 Hours.
5.	LNP Complex Business (1-19 Lines).	95% Within 24 Hours.
6.	LNP Complex Business (20-50 Lines).	95% Within 48 Hours.
7.	LNP Complex Business (Over 50 Lines).	95% FOC Time Frames Negotiated Within 24 Hours.