

ICC 01-0662
Phase II Sur-rebuttal Comments of SBC Illinois

Attachment 3
Response to Staff's "Key PMs Requiring Improvement"

Checklist Item	PM Number	PM Description	SBC Illinois Response
2	7.1	% Completion notices in one day	SBC Illinois has already committed to improvement plan, and results are to be tested by BearingPoint in re-testing completion notices. Differences from applicable standard are not significant to warrant further action, as over 98 percent of notices are currently delivered within the specified interval.
2	10.1	% Mechanized rejects returned in one hour	Differences from applicable standard are not material to overall checklist compliance (over 95 percent of electronic rejections are processed within benchmark interval). No need for future action, as standard has been revised and SBC Illinois would have met the revised standard.
2	10.2 and 10.3	% manual rejects returned in 5 hours	Differences from applicable standard are not material to overall checklist compliance (over 93 percent of electronic rejections are processed within benchmark interval). No need for future action, as standard has been revised and SBC Illinois would have met the revised standard.
2	17	% service orders posted within 30-day cycle	Reported shortfalls are not significant. Measure as defined allows for up to approximately 30 days for order to post to billing. Current implementation assesses frequency in which the service order is posted to billing prior to first bill cycle after order completion. Performance against 30-day standard would be higher; nevertheless, measure is to be subject to additional reporting and Staff supervision as described above.

Checklist Item	PM Number	PM Description	SBC Illinois Response
14	37	Trouble reports per 100 lines: resale	Shortfalls not significant enough to affect checklist compliance; nevertheless, measure is to be subject to additional reporting and Staff supervision as described above.
4	55	Average Installation Interval (Loops)	For those categories that had data in all three months, SBC Illinois <i>met</i> the applicable parity standards in at least two of the three months. The few shortfalls were small, and isolated (no category showed a shortfall in more than one of the three months). Nevertheless, measure is to be subject to additional reporting and Staff supervision as proposed above.
4	56	% Installations within Customer Requested Due Date (Loops)	SBC Illinois <i>met</i> the applicable parity standards for all categories of this measure in at least two of the three months.
4	59	% trouble reports within 30 days of installation (Loops)	Shortfalls not significant enough to affect checklist compliance; nevertheless, measure is to be subject to additional reporting and Staff supervision as described above.
4	62	Average Delay Days (loops)	SBC Illinois met the applicable standard in at least two of the three months in all categories of this measure. The single shortfall identified by Staff in its opening comments stemmed from a one-time record-keeping entry that did not affect actual installation. Staff does not address the measure or SBC Illinois' analysis in its rebuttal.
4	65	Trouble Report Rate (loops)	Shortfalls not significant enough to affect checklist compliance; nevertheless, measure is to be subject to additional reporting and Staff supervision as described above.

Checklist Item	PM Number	PM Description	SBC Illinois Response
4	66	% missed repair commitments (loops)	Shortfalls not significant enough to affect checklist compliance; nevertheless, measure is to be subject to additional reporting and Staff supervision as described above.
4	67	Mean time to Restore (loops)	Shortfalls not significant enough to affect checklist compliance; nevertheless, measure is to be subject to additional reporting and Staff supervision as described above.
7	104	Average Time to Update 911 Database	Shortfalls in parity are small and do not impact compliance with safety standards; further, the additional time required to process CLEC updates is at least partly attributable to CLEC errors. SBC Illinois has addressed Staff's request for information on actions taken to help CLECs prevent errors.
2	MI-2	% orders given jeopardy notices	Differences are not significant, given that jeopardy notices only indicate that due dates might be missed. SBC Illinois is successfully meeting due dates
2	MI-14	% maintenance completion notifications within "X" hours	Effective February 1, 2003, SBC Illinois has implemented a new process to deliver maintenance notices. Results of the new process will be posted on March 20, 2003. In the meantime, current differences are not significant, given that maintenance notices do not affect service or the actual work of repair and given performance of over 80 percent.
4	CLEC WI-6	% Form "A" within interval (Facilities Modification)	SBC Illinois met the applicable standards in at least two of three months for the categories that comprise most of the volume; the shortfalls here were small and relate to a single, low-volume category.