

Docket No. 01-0662
Illinois Commerce Commission OSS Test Collaborative Meetings
ICC Staff Advanced Questions for Ernst & Young

Workshop Exhibit 2.2

Ernst & Young – Questions

<i>Question No.</i>	<i>Question</i>	<i>Response</i>
Staff/E&Y 1	SBC asked E&Y to conduct its review for Illinois in October 2002, is this correct?	Yes, that is correct
Staff/E&Y 2	What individuals do E&Y report to at SBC from an engagement standpoint?	Our engagement letter was signed by Jeff Upholzer. Periodically, we report status to Jeff Upholzer as well as Mike Gilliam.
Staff/E&Y 3	In the report E&Y provided for Illinois, what is the earliest date that analysis was conducted for which results are contained in the report?	As noted in our Scope and Approach document dated January 17, 2003, E&Y leveraged previous testing conducted in conjunction with our attestation examination of the Company's compliance with the Michigan Business Rules (Report dated October 18, 2002). This work began in June 2002. The period tested for both the Michigan and Illinois engagements was March, April, and May 2002.
Staff/E&Y 4	When did E&Y first start to conduct its work in Michigan? When was it hired by SBC to perform the Michigan performance metrics work?	June 2002
Staff/E&Y 5	How does the work that E&Y did for Michigan specifically overlap and or apply to the analysis conducted for Illinois?	Much of the work performed for Michigan also applies to Illinois. Specifically, the process flows and activity dictionaries, transaction testing, code review, certain site visits, etc. are virtually the same (with minor alterations for differences in the Business Rules).
Staff/E&Y 6	What additional work, please point to specifics in your report, did E&Y conduct on behalf of Illinois or on Illinois specific data above and beyond the work conducted for Michigan?	Answered during testimony

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Staff/E&Y 7	<p>Were any additional exceptions issued by E&Y in Illinois that were not issued in Michigan? If so, which ones?</p> <p><i>Follow-up: Were there any additional interpretations issued by E&Y in IL not issued in MI?</i></p>	<p>Issue I – 42, II – 35 and IV – 4 are new issues in the Illinois.</p> <p>IL I-53 and V-15 were categorized as Interpretations in MI.</p> <p><i>Yes, Interpretations No. 24 relating to PM 55 and Interpretation No. 27 relating to PM 61 addressed Illinois-specific interpretations, therefore were not included in the Michigan report. In addition, Interpretation No. 29 relating to PMs 70 and 81 was not included in the Michigan report.</i></p>
Staff/E&Y 8	<p>On page 1 of its January 17, 2003 Supplemental Report, E&Y indicates that its Compliance Report and its Controls Report cover all aspects of the PMR4, data integrity, Master Test Plan section. Is this correct?</p> <p><i>Follow-up: For each PM were there specific IL transactions tested?</i></p>	<p>That is correct.</p> <p><i>Yes, there were specific IL transactions tested for each Performance Measure.</i></p>
Staff/E&Y 9	<p>Why does E&Y believe it is important to conduct data integrity testing of SBC Illinois performance measures?</p>	<p>In order to examine the effectiveness of controls associated with the accuracy and completeness of reported data in accordance with the Business Rules during the Evaluation Period for the Company.</p>
Staff/E&Y 10	<p>Please explain how E&Y conducted its data integrity testing?</p>	<p>In order to issue the aforementioned reports, our evaluation of the adequacy of data integrity was a critical element of our examination procedures. Accordingly, Ernst & Young (E&Y) performed</p>

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		<p>examination procedures in many different areas impacting data integrity, including both manual and electronic original data sources entering the source systems for processing and ultimately, inclusion in the calculation of performance measures (PMs). Our approach to the data integrity examination included four key areas: (1) Process Flows and Activity Dictionaries, (2) Site Visits, (3) Interface Evaluation and (4) Transaction Testing. The procedures employed allowed us to understand and test the sources of data, the processing and control of such data, and the validity of data entering the source systems. It was the results achieved from the performance of all of the procedures that provided our basis for evaluating and relying on the Company's data integrity controls and allowed for us to issue our examination report on the effectiveness of the controls over the accuracy and completeness of reported data.</p>
Staff/E&Y 11	<p>What did E&Y find with respect to its data integrity testing in Illinois? How many of the 128 total exceptions were uncovered by E&Y's data integrity testing? Please identify the exception numbers.</p>	<p>Data integrity as defined in PMR 4 is intended to test: 1) Transfer of data from point(s) of collection; 2) Conversion of data from raw to processed form and 3) Internal Controls. Using this description, all of the exceptions in the report relate to data integrity.</p> <p>Specifically related to the four steps noted in question 10 above (excludes code review, recalculations, analytical review and review of Enhancement Requests and BearingPoint findings), E&Y noted 41 exceptions as noted below:</p>

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		<p>Section I: 1, 2, 3, 8, 29, 32, 40, 47, 48, 50, 52</p> <p>Section II: 1, 2, 7, 8, 9, 14, 15, 21, 22, 24, 25, 28, 41, 42, 43, 45, 46, 47, 49, 50, 51</p> <p>Section III: 2</p> <p>Section IV: 1, 3, 5, 6, 7</p> <p>Section V: 1, 4, 13</p>
Staff/E&Y 12	Is E&Y able to say how the data integrity testing it conducted is the same or different from the data integrity testing that BearingPoint performs? If so please list those differences.	We are not in a position to comment on BearingPoint procedures. Ernst and Young procedures are listed in Staff/E&Y 10.
Staff/E&Y 13	Did E&Y compare its own records that it submitted to SBC's processed data in its PMR4 review? Did it compare any CLEC records that it observed being submitted to SBC's processed data?	No E&Y records were submitted to SBC's processed data. During E&Y transaction testing and site visits, CLEC records were compared to SBC's processed data.
Staff/E&Y 14	In conducting its audit did E&Y confirm that what is entered on a pre-order or order by an external party is actually what is recorded by SBC in its source systems?	For manual orders (i.e. fax orders) as part of our transaction testing we agreed transactions back to any source documentation that existed (i.e. we took the manual transaction from the source system and agreed it back to the fax). For Electronic transactions we documented our understanding of the processes and controls for electronic transactions to be entered into the SBC source systems. Additionally, we performed walkthroughs of the controls identified.
Staff/E&Y 15	Were there any source systems for which E&Y did not review a sample of unprocessed data with processed data?	No
Staff/E&Y	How did E&Y perform the PMR5, data replication, aspect	See attachment 1

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16	<p>of its review? Exactly how did E&Y conduct its replication activities? How were the recalculation activities performed? Which set of data does E&Y perform the recalculations against?</p> <p><i>Follow-up: For IL manual measures where did E&Y do additional work?</i></p>	<p><i>See attachment 2</i></p>
Staff/E&Y 17	<p>Did E&Y uncover any inaccuracies in the recalculation component of its review? If so, how many of the 128 total exceptions were found in the recalculation work? Please list the exception numbers.</p>	<p>Six of the 128 exceptions were found during the recalculation work. Procedures for PMR5 rely on both code review and recalculation procedures. The majority of errors are identified during code review prior to recalculation.</p>
Staff/E&Y 18	<p>Were recalculations specifically conducted for the Illinois reported performance measurement data in E&Y's evaluation?</p>	<p>Recalculations were specifically conducted for Illinois reported performance measures.</p>
Staff/E&Y 19	<p>Please explain more about what mechanized interface control level reviews are? What does E&Y do in a mechanized interface control level review?</p> <p><i>Follow-up: Does your appendices to the supplemental report indicate which specific transaction tests were conducted in addition for IL.</i></p>	<p>The procedures we performed for the mechanized interface testing included documenting our understanding of the processes and controls for the entry of data into the electronic interface though the data transfer into the SBC source systems in which we selected our data for transaction testing. After documenting our understanding, we then performed walkthroughs of the controls documented.</p> <p><i>No, Attachment 3 below lists the PMs reviewed for additional testing and the additional testing, if needed, conducted for each.</i></p>
Staff/E&Y 20	<p>In appendix B, Transaction Testing Results, are all the transactions listed as being tested, Illinois specific</p>	<p>No, 32% of the transactions tested were Illinois specific transactions. E&Y conducted the</p>

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	transactions? If not what % of the transactions are Illinois specific transactions? When did E&Y conduct these tests?	<p>transaction testing noted in Appendix B from June 2002 through January 2003.</p> <p>PM18 – RBS Cycle reports – Randomly selected 40 wholesale bills. In addition, randomly selected 50 Illinois retail bills from ACIS and 50 Illinois wholesale bills from CABS.</p> <p>All 140 transactions tested for PM 18 were properly included in the PM 18 results.</p>
Staff/E&Y 21	When E&Y had questions about the business rules or data being evaluated whom did it ask clarification from?	E&Y obtained the Company's explanation regarding situations where the Company's implementation of the Business Rule differed from E&Y's literal reading of the Business Rule. In those situations, E&Y evaluated the reasonableness of the Company's response and disclosed the issue either as an interpretation or an exception in our report. This treatment is in accordance with the American Institute of Certified Public Accountant's professional guidance and appropriately discloses the issue for third parties to make their own independent conclusions.
Staff/E&Y 22	Did E&Y meet with either Illinois Commission Staff, other state commission staff or CLECs to ask questions and or opinions with respect to specific aspects of its review?	In November 2002, E&Y met with various members of the Illinois Commerce Commission Staff to discuss E&Y's methodology to testing performance measurements. At this meeting, E&Y shared a copy of our Michigan performance measurement examination report and discussed the presentation of interpretations. The disclosure of interpretations in the Illinois report is similar to that of our report in Michigan.

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Staff/E&Y 23	<p>In attachment B to its Report, E&Y lists all of the interpretations to the business rules that it applied while performing its examination. Did E&Y verify any of the interpretations in the report? Did E&Y verify that SBC Positions/Modifications agreed-to in the six-month review updates were actually reflected in the business rule documents drafted for submission to the ICC as a result of the six-month review collaborative?</p> <p><i>Follow-up: Can E&Y indicated whether or not this version of the business rules is the same copy that SBC – Illinois filed as part of its tariff this past Monday.</i></p>	<p>E&Y identified the interpretations listed in Attachment B throughout the performance of our examination. E&Y did verify that the SBC Positions/Modifications agreed-to in the six-month review updates were actually reflected in the business rule documents drafted for submission to the ICC as a result of the six-month review collaborative.</p> <p><i>Having reviewed our version of the red-lined business rules to the tariff filed by SBC, we did not note any substantive differences.</i></p>
Staff/E&Y 24	<p>How many performance measures for the data months evaluated have been restated one or more time since data was originally posted by SBC (regardless of materiality standards)?</p> <p><i>Follow-up: Please confirm that the 108 Performance Measures restated for the months evaluated were cumulative.</i></p>	<p>108 performance measures have been restated for the months evaluated.</p> <p><i>It was cumulative over the months we examined.</i></p>
Staff/E&Y 25	<p>What level of restatements does E&Y consider to be acceptable given a well established, defined and reliable performance metrics reporting system and change control process?</p>	<p>The scope of our engagement was to report on the accuracy and completeness of performance measurements and the effectiveness of the Company's controls to generate accurate and complete performance measurements in accordance with the Illinois Business Rules.</p> <p>To the extent that errors occur (whether restated or not) that result in a material misstatement of a performance measurement, we would qualify our</p>

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		<p>report and disclose the noncompliance in our report.</p> <p>We are not allowed by our professional guidance to issue opinions on subject matter in which the criteria used to evaluate the subject matter is not defined. The term "acceptable" is not adequately defined as it could mean different things to different parties.</p>
Staff/E&Y 26	<p>In its report, E&Y "disclosed that certain processes used to generate performance measurements, primarily related to the manual collection and processing of data and computer program coding and modifications, did not include certain controls to ensure the accuracy of the reported performance measurements." Does E&Y know if these deficiencies have been addressed by SBC? Has E&Y performed any analysis and or verification to ensure that these deficiencies have been addressed? If the deficiencies remain as they, are what types of issues, problems can we expect to see or continue to see in the reporting of performance measures by SBC?</p>	<p>Our report on the effectiveness of the Company's controls over compliance with the Illinois Business Rules was qualified as a result of the instances of noncompliance that were noted in our Compliance Report. Based on an analysis of the instances of noncompliance noted in our report, the following control issues were noted:</p> <ul style="list-style-type: none"> • Controls were not adequate to ensure the initial implementation of the computer program code to apply the Business Rules was accurate. • Controls were not adequate to ensure all computer program code was updated on a timely basis so that the performance measurements properly captured information from the LASR/LSOG 5 system/interface implementation in April 2002. • Certain controls were not in place to prevent manual errors from occurring.

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		<p>The majority of exceptions in our Compliance Report relate to the first two control issues noted above which are addressed as the Company implements the corrective action to the computer program code. E&Y has tested the accuracy of these corrections as noted in our Compliance Report.</p> <p>The attestation standards (SSAE 10, 5.47g) preclude us from projecting any evaluation of controls to future periods as those controls may change.</p>
Staff/E&Y 27	If E&Y did not uncover the exceptions it found during its review, does E&Y believe that SBC and its processes and controls in place for performance measurement calculation and reporting would have uncovered all of these errors in the same period of time?	Many of the exceptions and interpretations noted in our report were the result of extensive audit procedures to review the Company's underlying computer program code and extensive transaction testing of underlying results. The Company does have resources and control procedures in place to detect errors. However, it is unlikely that all errors in our report would have been uncovered in the same time period.
Staff/E&Y 28	Is it correct that E&Y only categorized items as exceptions when either the issue would have changed the reported result by 5% or more or the error changed the parity attainment/failure? Was this rule always applied to the CLEC aggregate results only? Was this standard applied at the measure level or the sub-measure level?	Exceptions to compliance with the Business Rules were considered material and included in our Compliance Report if they changed the aggregate CLEC or retail result by 5% or more or the error changed the parity or benchmark attainment/failure. This standard was applied at the sub-measure level.
Staff/E&Y	How did E&Y develop its standard or measure for the	This is our professional judgment and is the same

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29	determination of an exception?	criteria used in our FCC Merger Compliance engagement.
Staff/E&Y 30	Did E&Y ever look at the impact of exceptions or on a specific CLEC or company?	No, our report is on aggregate results.
Staff/E&Y 31	How many other errors or anomalies did E&Y uncover during its review that did not meet the E&Y established exception threshold defined?	We have not quantified the number of errors that did not go in our report.
Staff/E&Y 32	In attachment A, Exceptions to Compliance, items in category II are exceptions which E&Y asserts have been corrected but March, April and May results were not restated. Is this correct?	For Attachment A, Exceptions to Compliance, items in category II are exceptions which <u>SBC</u> asserts have been corrected but March, April, and May results have not been restated.
Staff/E&Y 33	Would E&Y agree that it produced 51 exceptions that are listed as category II and that these exceptions affect one or more of 72 of the 150 performance measures reported or approximately 48% of the performance measures?	Yes, the 51 exceptions listed in Section II related to 72 performance measurements. E&Y has not determined how many submeasures of these 72 performance measurements were affected, therefore we cannot verify the percentage of overall performance measurements.
Staff/E&Y 34	Can E&Y explain why SBC decided not to make the data restatements for March, April and May results to correct the category II errors?	No, this question should be addressed to the Company.
Staff/E&Y 35	Didn't E&Y determine that all of the category II exceptions would have changed the pass/fail attainment or would have changed the reported results by more than 5%?	If data was not available to prove that an exception was immaterial, we defaulted to disclosing it as an exception in our report.
Staff/E&Y 36	In Attachment A, Exceptions to Compliance, of its report E&Y communicates that it verified the category II fixes that were made to data months later than the inspection period. What data month(s) were the verifications performed for and how were the verifications performed. Where the verifications performed just for some data months or all data months after May 2002?	E&Y tested the corrective action implemented by the Company. This was done through review of the revised computer program code or relevant process change <u>and</u> through testing of underlying transactions. This was typically done for a one month period after the correction was implemented.

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Staff/E&Y 37	<p>During its verification of exception work (regardless of exception category) did E&Y uncover any situations in which SBC said an issue was addressed but then E&Y found it wasn't? If so, please communicate the specific instances that E&Y saw this situation occur.</p> <p><i>Follow-up: Can you indicate which exceptions you were in the process of verifying when you discovered that fix was not corrected?</i></p>	<p>Answered during testimony</p> <p>Open</p>
Staff/E&Y 38	<p>Would E&Y agree that it produced 7 exceptions that are listed as category IV, Exceptions in which the company plans no corrective action? Would E&Y agree that the category IV exceptions affect one or more of 10 of the 150 performance measures reported or approximately 7% of the performance measures?</p>	<p>Yes, the 7 exceptions listed in Section IV related to 10 performance measurements. E&Y has not determined how many submeasures of these 10 performance measurements were affected, therefore can not verify the percentage of overall performance measurements.</p>
Staff/E&Y 39	<p>Would E&Y agree that it produced 15 exceptions that are listed as category V, Exceptions that SBC says are in the process of being corrected, and that the category V exceptions affect one or more of 44 of the 150 performance measures reported or approximately 29% of the measures?</p>	<p>Yes, the 15 exceptions listed in Section V related to 44 performance measurements. E&Y has not determined how many submeasures of these 15 performance measurements were affected, therefore we cannot verify the percentage of overall performance measurements.</p>
Staff/E&Y 40	<p>Would E&Y agree that in total it produced 128 exceptions impacting one or more of 112 of the 150 performance measures or 75% of the measures initially reported for the March, April and May 2002 data months? Would E&Y also agree that on average each of the 112 measures were impacted by 3.2 exceptions?</p>	<p>E&Y agrees that in total it produced 128 exceptions impacting 113 of the 150 performance measurements. E&Y has not determined how many submeasures of these 113 performance measurements were affected; therefore we cannot verify the percentage of overall performance measurements. Our analysis indicates that on average each of the 113 measures were impacted by 3.7 exceptions.</p>

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Staff/E&Y 41	For category V exceptions, E&Y states that it verified the assertions of the company with respect to the impact of each individual exception. How did E&Y conduct this verification?	E&Y requested and tested supporting analyses, documentation, and rationale to validate the Company's assertion.
Staff/E&Y 42	Across all exception categories did E&Y determine or look at the cumulative impact of the exceptions on each individual performance measure; considering each performance measure with an exception was on average impacted by 3 exceptions? If not, why didn't E&Y look at the cumulative impact of the exceptions?	The scope of our engagement was to report on the Company's compliance with the Business Rules for the period of March, April and May 2002. If an issue materially impacted compliance with the Business Rules, it is included as an exception in our report. We did not perform additional analysis of the cumulative impact of reported exceptions as this was not within the scope of our engagement.
Staff/E&Y 43	Did E&Y perform any verification and or review of SBC's overall policies and practices for managing changes to metrics and for communicating changes to CLECs and regulators?	E&Y reviewed the "SBC Ameritech Performance Measurements Internal Change Management Policy & Procedures" guide. Section 4 of this guide contains policies on communication of changes to CLECs and regulatory agencies. As well, throughout the process of analyzing and working with ERs, EY was able to observe SBC Ameritech's change management policies and procedures in practice on a day-to-day basis. However, the scope of our engagement was not to issue an opinion on this process.
Staff/E&Y 44	Has E&Y found any new exceptions since the report was filed on January 17, 2003? If so please communicate what they are and which Performance measures are impacted.	We are not aware of any new exceptions that impact the period of March, April or May 2002 since our report was filed on January 17, 2003.
Staff/E&Y 45	Which of the 128 exceptions that E&Y uncovered has E&Y verified that the exceptions do not exist in data reported	It is E&Y's understanding that the September, October and November 2002 results filed on

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	<p>as of January 17, 2003 for September, October and November 2002?</p> <p><i>Follow-up: Which exceptions are specifically related to the manual performance measures?</i></p>	<p>January 17, 2003 included all restatements to those months made through January 6, 2003. The attached listing of the 128 exceptions noted by E&Y indicates whether each issue is or is not reflected in the September, October and November 2002 as filed on January 17, 2003.</p> <p><i>Open</i></p>

Attachment 1 (Staff/E&Y 16)

How did E&Y perform the PMR5, data replication, aspect of its review? Exactly how did E&Y conduct its replication activities? How were the recalculation activities performed? Which set of data does E&Y perform the recalculations against?

Performance Measure Code Review

E&Y reviewed the respective programming code that contained the Business Rules (exclusions, inclusions, calculation of the numerator and denominator, and disaggregation rules) within the front-end, intermediate, or reporting systems. E&Y tested the corresponding manual processes. E&Y compared the code and manual processes to the Business Rules for each PM to determine whether AIT's processes were designed to apply the Business Rules properly. In addition, all changes made to programming code were reviewed for propriety and to ensure processes and controls were modified to support the code changes. The procedures performed in the PM code review cover Master Test Plan Sections: PMR 2, 3, 4, and 5.

To validate the results of the code review, E&Y performed significant transaction testing and analytical review procedures as described below to determine that the program code was functioning as designed.

Performance Measure Recalculation

E&Y obtained the data from the AIT intermediate systems for March, April, and May 2002 that contained the underlying data after the Business Rules were applied. E&Y then recalculated the PM results for each PM reviewed for March, April, and May 2002. Additionally E&Y recalculated the corresponding z-scores for the month of May 2002 that did not require a permutation calculation. A sample of 5 disaggregations that required a permutation calculation were recalculated from a total of 16 disaggregations that required a permutation calculation. Results were then compared with the results originally posted on the CLEC website for each month.

The recalculation of the PM results included summarizing numerator and denominator information by disaggregation and then recalculating (dividing numerator by denominator) the results. For each PM, the recalculation for each disaggregation was validated to the PM Business Rule documentation for completeness of reporting all disaggregations for a PM. The procedures performed for PM recalculation testing covered Master Test Plan Sections: PMR 4 and 5.

Attachment 2 (Staff/E&Y 16-follow-up)

Additional Retail Testing Required due to differences in Business Rules:

PM 18 – Transaction testing

PM 70 – Transaction testing

PMs 105 & 106

No testing necessary b/c no Ameritech New Media transactions (retail comparison) occurred during testing period

PMs 120 & 121

No affiliate BFRs during testing period, so no additional testing necessary

PMs 108 & 109

This measure is parity with Ameritech Affiliate for Illinois. ASI (Affiliate) transactions included in testing sample for original work.

Additional testing required for PMs that were only tested for MI in original work:

PM 19

PM 70.2 & 71

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Attachment 3 (Staff/E&Y 19 -follow-up)

Benchmark Differences in Illinois Business Rules				
		Benchmark		
PM#	PM Name	IN, MI, OH WI	IL	Additional Illinois Testing Performed
7	% Mechanized Completion Returned within 1 hr	97%	99%	None needed - benchmark % difference only
7.1	% Mechanized Completion Returned within 1 day	97%	99%	None needed - benchmark % difference only
18	Billing Timeliness (Wholesale bill)	95%	Parity - Retail	50 additional IL wholesale transactions from CABS & 50 IL retail transactions tested from ACIS
55	Average Installation Interval	Various # of business days	Parity - Retail	No additional testing needed. Testing of retail transactions included in all states since retail parity benchmarks in other Provisioning PMs
56	% Installations Completed within Customer Requested Due Date	95% within "x" days	Parity - Retail	No additional testing needed. Testing of retail transactions included in all states since retail parity benchmarks in other Provisioning PMs
70	% of Trunk Blockage (Call Blockage)	B.01	Parity - Company	Additional Illinois Testing Performed - Retail results were recalculated from source trunking reports.
75	% AIT Caused Missed Due Dates > 30 days, Interconnection Trunks	no more than 2% > 30 days	Parity - Retail	Tested 40 additional retail transactions from TIRKS - same sample previously tested for PM 74
78	Average Interconnection Trunk Installation Interval	20 business days	Parity - Retail	Tested 40 additional retail transactions from TIRKS - same sample previously tested for PM 74
80	Directory Assistance Average Speed of Answer	WI=6.3 sec, IN=7.7 sec, MI=10sec, OH=20sec	IL=7 sec	None needed - benchmark difference only

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82	Operator Services Speed of Answer	WI=2.7 sec, IN=3.3 sec, MI=10sec, OH=20sec	IL=3.6 sec	None needed - benchmark difference only
105	Poles, Conduits & ROW - % of Requests Processed within 35 days	90%	Parity - Retail	Additional testing of retail transactions not applicable since there were no Ameritech affiliate transactions during the period. Ameritech New Media is no longer an affiliate
106	Poles, Conduits & ROW - Average days required to process Request	90% within 35 days	Parity - Retail	Additional testing of retail transactions not applicable since there were no Ameritech affiliate transactions during the period. Ameritech New Media is no longer an affiliate
108	Average Delay Days for Ameritech Missed Due Dates	delay not to exceed 10% of std interval	Parity - Retail	Ameritech affiliate transactions included in population & sample previously tested. 10 of 40 sampled transactions were affiliates
109	% of Requests Processed within the Established Timelines	90% within 10 business days	Parity - Retail	Ameritech affiliate transactions included in population & sample previously tested. 10 of 40 sampled transactions were affiliates
110	% of Updates Completed into the DA Database within 72 hours for Facility Based CLECs	95%	Parity - Retail	No benchmark difference for manual submeasure - only electronic submeasure has different benchmark for IL. Tested electronic submeasure with code review & 100% recalculation - therefore Ameritech retail was tested.
111	Average Update Interval for DA Database for Facility Based CLECs	48 hours	Parity - Retail	No benchmark difference for manual submeasure - only electronic submeasure has different benchmark for IL. Tested electronic submeasure with code review & 100% recalculation - therefore Ameritech retail was tested.
113	% of Electronic Updates that Flow Through the Update Process without Manual Intervention	97%	Parity - Retail	Retail transactions were included in the sample selected for all states. No additional testing needed for Illinois.
120	BFRs - % of Requests Processed within 30 business	90%	Parity - Retail	Only 6 transactions occurred during Mar-May 02, for all states - tested 100%

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	days			
121	BFRs - % of Quotes Provided for Authorized BFRs within 45 business days	90%	Parity - Retail	No results were reported for Mar-May 02