

Docket No. 01-0662
SBC Illinois Phase II Brief on Exceptions
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Checklist Item	Topic	Description of Commitment	Due Date	Status	Citation
2	Opt-In Policies	SBC commits to post to its CLEC website language that generally sets forth its MFN obligations under Section 252(i) and its policies regarding the incorporation of tariffs by reference into ICAs.		Completed on April 9, 2003.	HEPO ¶ 126 SBC Ex. 3.1, ¶ 5; SBC Ex. 3.2, ¶¶ 4-5, Sch. SJA-1
2	UNE Rate Clarity	SBC commits to file tariff language clarifying the application of entrance facility and connection charges to EELs.		Completed (tariff filed on April 8, 2003, effective May 19, 2003).	HEPO ¶ 126 SBC Ex. 7.1, ¶ 5; SBC Ex. 7.2, ¶ 32
2	UNE Rate Clarity	SBC commits to post to its CLEC website a matrix detailing the application of rates for various UNE-P scenarios.		Completed on March 20, 2003.	HEPO ¶ 126 SBC Ex. 7.1, ¶ 12, Sch. MDS-2; SBC Ex. 7.2, ¶ 32
2	UNE Rate Clarity	SBC commits to post to its CLEC website a matrix detailing the application of rates for EEL scenarios.		Completed on March 25, 2003.	HEPO ¶ 126 SBC Ex. 7.1, ¶ 8, Sch. MDS-1; SBC Ex. 7.2, ¶ 32
2	TELRIC Compliant UNE Rates	SBC commits to lower subloop rates to levels proposed in Wardin Affidavit.		Will file revised tariffs on one-day's notice immediately after a final Commission	HEPO ¶ 127 SBC Ex. 8.0, ¶ 14

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			Order is adopted.		
2	TELRIC Compliant UNE Rates	SBC commits to lower two line connection subloop NRCs to California level.	Will file revised tariffs on one-day's notice immediately after a final Commission Order is adopted.		HEPO ¶ 128 SBC Ex. 8.1, ¶ 16
2	TELRIC Compliant UNE Rates	SBC commits to lower CNAM query rate to Michigan rate of \$.007932.	Will file revised tariffs on one-day's notice immediately after a final Commission Order is adopted.		HEPO ¶ 127 SBC Ex. 8.0, ¶ 19
2	TELRIC Compliant UNE Rates	SBC commits to file true-up language in tariff for identified "interim" UNE rates.		Completed (tariffs filed on February 20, 2003, effective March 15, 2003, and on March 17,	HEPO ¶ 130 SBC Ex. 8.0, ¶¶ 23-24; SBC Ex. 8.1, ¶¶ 21-22

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				2003).	
2	UNE-P Billing Accuracy	<p>SBC commits to correct ICA billing errors associated with UNE-P billing.</p> <ul style="list-style-type: none"> • Change ICA billing tables where appropriate • Issue credits where appropriate <p>SBC will report when process improvements are complete.</p>	When complete.	<ul style="list-style-type: none"> • Billing table changes for CLECs in 271 proceeding complete; billing table changes in progress for other CLECs • Issuance of credits in progress 	<p>HEPO ¶ 150</p> <p>SBC Ex. 7.2, ¶¶ 11-12, 17, 21, 24-26</p>
2	UNE-P Billing Accuracy	<p>SBC commits to implement 5-step program to improve its contract management program:</p> <ul style="list-style-type: none"> • SBC will offer CLECs a contract amendment tying ICA UNE-P rates to tariffed rates • SBC will ask CLECs to amend old contracts 		In progress.	<p>HEPO ¶ 153</p> <p>SBC Ex. 3.0, ¶ 17; SBC Ex. 7.2, ¶¶ 27-31; SBC Ex. 9.1, ¶ 16</p>

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		<p>to include current UNE products and services</p> <ul style="list-style-type: none"> •SBC will amend its UNE-P tariffs that allow CLECs with ICAs to take service from the tariff to require written notice from the CLEC • SBC will use a multi-functional approach to determine the impact of future ICC TELRIC orders on existing ICAs •SBC will issue revised M&P to service center personnel to clarify the application of UNE-P non-recurring charges when orders are processed manually • SBC will file bi-monthly reports detailing steps taken by the Company and CLECs to clarify billing issues 	Bi-monthly		
2	Billing Auditability and Dispute Resolution	SBC commits to implement the Michigan Bill Auditability and Dispute Resolution Plan in Illinois, including filing status reports on the same schedule as Michigan.	Reports are due April, July, October.		HEPO ¶ 156 SBC Ex. 10.0, ¶¶ 12-13; SBC Ex. 10.1, ¶ 15
2	Bearing Point Re-Testing	SBC commits to implement corrective action for BearingPoint issues TVV 1-28 (timeliness of service order completion responses); TVV	November 30, 2003.		HEPO ¶ 1342 SBC Ex. 1.3

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		<p>4-27 (accuracy of updates to customer service records); and TVV 7-14 (accuracy of close out coding on end-to-end trouble faults). SBC commits to address any remaining operational deficiencies by July 31, 2003 and to use full and good faith efforts to have these items successfully re-tested by an independent third-party tester by November, 2003. The Company will report to the Commission on the status of re-testing at that time. Thereafter, the Commission can determine the appropriate next steps.</p>			(3/17/03 Cottrell Surrebuttal) ¶¶ 8-9
2	Customer Service Inquiry Accuracy Plan	<p>SBC commits to file an Illinois-specific Customer Service Inquiry Accuracy Plan that mirrors the plan filed in Michigan.</p> <p>This is the same issue as TVV 4-27 referenced above.</p>	To be filed on May 1, 2003.		SBC Ex. 1.2 (3/3/03 Cottrell Rebuttal) ¶¶ 14-15
2	Repair Coding Accuracy Plan	<p>SBC commits to file an Illinois-specific Special Circuit Repair Coding Accuracy Plan that mirrors the plan filed in Michigan. This includes items 2 and 3 recommended by McLeod and TDS – and some (but not all) of item 1. Note that this commitment does not apply to UNE Repair Coding Accuracy, because SBC Illinois successfully passed</p>	To be filed on May 1, 2003.		HEPO ¶¶ 1317-18 SBC Ex. 1.3 (3/3/03 Cottrell Surrebuttal) ¶¶ 14-15

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		BearingPoint’s evaluation on this point. This is the same issue as TVV7-14 referenced above.			
2	Directory Listing and Directory Assistance Database Update Accuracy Plan	SBC will implement the plan on a Midwest regional basis and will provide the Commission with periodic reports of the regional results associated with this plan.	Reports will be filed with the Commission as specified in this plan.		SBC Ex. 1.2 (3/3/03 Cottrell Rebuttal) ¶ 14
2	Billing Auditability and Dispute Resolution	SBC commits to file an Illinois-specific Billing Auditability and Dispute Resolution Plan that mirrors the plan filed in Michigan.	To be filed on May 1, 2003.		HEPO ¶ 1328 SBC Ex. 1.3 (3/17/03 Cottrell Surrebuttal) ¶¶ 12-13
2	Line Loss Notifier Communications	SBC commits to file an Illinois-specific Line Loss Notifier Communication Plan that mirrors that plan filed in Michigan and commits to provide the Commission with the monthly Line Loss Notifier issues report described in that plan.	To be filed on May 1, 2003.		HEPO ¶ 1334 SBC Ex. 1.3 (3/17/03 Cottrell Surrebuttal) ¶¶ 12-13
2	Change Management	SBC commits to file an Illinois-specific Change Management Communications Plan	To be filed on May 1, 2003.		HEPO ¶ 1337

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	Communication	and to provide the Commission with quarterly progress reports for one (1) year beginning April 30, 2003.	May 1, 2003.		SBC Ex. 1.3 (3/17/03 Cottrell Surrebuttal) ¶¶ 12-13
2	Pre-Order Processing Timeliness Plan	SBC will implement the plan on a Midwest regional basis and will provide the Commission with a report in July 2003 (quarterly thereafter, if needed) of the regional results associated with this plan.	Reports will be filed as specified in the plan.		SBC Ex. 1.3 (3/17/03 Cottrell Surrebuttal) ¶¶ 12-13
2	BearingPoint Re-testing	SBC to implement corrective actions for TVV 1-4 (Order functionality) and PPR 13-4 (billing products process – error checking). SBC commits to address these issues and to use full and good faith efforts to have these items re-tested by BearingPoint by August, 2003.		Completed. These observations and exceptions have been corrected by SBC and closed successfully by BearingPoint. TVV1-4 was satisfied effective with the closing of observation 666 on April 15, 2003. PPR 13-4 was satisfied with the closing of exception 119 on March 18, 2003.	HEPO ¶ 1342 SBC Ex. 1.2 (3/3/03 Cottrell Rebuttal) ¶¶ 7, 10-11

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2	Line Loss	SBC to correct the loss notification issue with partial migration of accounts.		Completed. Software changes were completed by June 5, 2002. A further fix was made on March 7, 2003. See Accessible Letter CLECAM03-019 and CLECAM03-021.	HEPO ¶¶ 729, 1312, 1313 SBC Ex. 1.0 (1/22/03 Cottrell Affidavit) ¶ 5
2	Line Loss	SBC to retrain its personnel to prevent loss notification problems arising from manual handling errors in local service centers.		Completed.	HEPO ¶¶ 729, 1312, 1313 SBC Ex. 1.0 (1/22/03 Cottrell Affidavit) ¶ 6
2	Line Loss	SBC to determine if other situations exist that cause line loss notifications to be inaccurate or untimely, and correct those situations immediately.		Completed. SBC Illinois continues to monitor and correct any situations that might arise.	HEPO ¶¶ 729, 1312, 1313 SBC Ex. 1.0 (1/22/03 Cottrell Affidavit) ¶ 7
2	Line Loss	SBC to clearly state all the problems it has uncovered relating to loss notifications since January 2001 and to communicate those in an		Completed.	HEPO ¶¶ 729, 1312, 1313

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		January 2001 and to communicate those in an Accessible Letter. The Accessible Letter should indicate when the problem was first identified, what software versions it lies to, what action SBC has taken to correct each issue and when the action was taken, any plan or future action SBC plans to take, and an estimate of when the action will be taken.			SBC Ex. 1.0 (1/22/03 Cottrell Affidavit) ¶ 8
2	Line Loss	On a CLEC by CLEC basis, SBC to determine the accounts for which loss notifications have never been sent or incorrectly sent and will communicate these instances to the affected CLECs. If issues persist, such reconciliation will be done on a monthly basis until all issues have been resolved.		Completed.	HEPO ¶¶ 729, 1312, 1313 SBC Ex. 1.0 (1/22/03 Cottrell Affidavit) ¶ 9
2	Line Loss	SBC commits to continue meeting with CLECs on an as needed basis to discuss the problems associated with loss notifications and the actions that SBC has taken to address them.		Completed. In addition, SBC does discuss LLN issues with CLECs as appropriate during regular monthly CMP meetings.	HEPO ¶¶ 729, 1312, 1313 SBC Ex. 1.0 (1/22/03 Cottrell Affidavit) ¶ 10

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2	Line Loss	SBC commits to modify the process to notify its retail organization of a customer loss or to modify the process SBC uses to notify its wholesale carriers of a customer loss to bring them into parity with one another.		Completed.	HEPO ¶¶ 729, 1312, 1313 SBC Ex. 1.0 (1/22/03 Cottrell Aff.) ¶ 11
2	Line Loss	Establish/Modify PM MI13 and PM MI13.1		Completed. Changes to business rules made in March, effective with April reports.	HEPO ¶¶ 729, 1312, 1313 SBC Ex. 2.0 (1/17/03 Ehr Aff.) ¶ 30; SBC Ex. 2.2 (3/3/03 Ehr Rebuttal Aff.) ¶ 241
4	Line Splitting	SBC commits to file tariff language that would establish a degree of comparability between the Company's provisioning of the UNEs necessary to support a line splitting arrangement and the Company's provisioning of HFPL for line sharing.	30 days after the date of the Order, effective on 1 day notice	Tariff language is ready for filing.	HEPO ¶ 1707 SBC Ex. 4.2 (3/17/03 Chapman Surrebuttal), ¶ 21 and Schedule CAC-8
4	PM 55-1.1	SBC commits to deliver a monthly report to Staff describing (a) the identified causes of performance shortfalls; (b) corrective actions; (c) schedule for completion of corrective	First business day of each month (starting April	The first report was provided to Staff on April 1, 2003.	HEPO ¶ 1833 SBC Ex. 2.3 (March 17, 2003

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		actions; and (d) current and most recent three months of performance results for the measure. Monthly report will cease upon SBC obtaining attaining two consecutive months of satisfying the relevant benchmark or parity measure. ¹	1, 2003)	2003.	Ehr Surrebuttal) ¶ 14
4	PM 55.1-3	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003. As the results show that SBC has now met the standard for two months, this PM will not be subject to further reporting.	HEPO ¶ 1833 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶ 14
4	PM 59	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003.	HEPO ¶¶ 1833, 1835 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶

¹ Note that SBC made the same commitment for PM 17-01, but the HEPO (¶ 1330) instead adopted Staff’s proposal to require SBC to report the steps it plans to take, implement corrective action, and demonstrate substantially improved performance in six months.

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					55
4	PM 65-03	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003.	HEPO ¶¶ 1833, 1835 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶ 14
4	PM 65-06	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003.	HEPO ¶¶ 1833, 1835 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶ 14
4	PM 65-08	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003.	HEPO ¶¶ 1833, 1835 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶ 14
4	PM 66-03	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April	The first report was provided to Staff on April 1, 2003. As the	HEPO ¶¶ 1833, 1835 SBC Ex. 2.3

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		months.	1, 2003)	results show that SBC has now met the standard for two months, this PM will not be subject to further reporting.	(March 17, 2003 Ehr Surrebuttal) ¶ 14
4	PM 67-03	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003. As the results show that SBC has now met the standard for two months, this PM will not be subject to further reporting.	HEPO ¶ 1833, 1835 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) at 10
4	PM 67-18	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003.	HEPO ¶¶ 1833, 1835 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶ 14
7	911 (PM 104)	SBC commit to pursue and explore with Staff and CLECs a more reasonable and workable	The next six-month		HEPO ¶ 2071

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		and CLECs a more reasonable and workable standard for PM 104.	month collaborative		
14	PM 37-01	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003.	HEPO ¶ 2552 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶ 14
14	PM 37-04	As for PM 55-1.1, SBC to provide monthly performance report to Staff until it meets performance standard for two consecutive months.	First business day of each month (starting April 1, 2003)	The first report was provided to Staff on April 1, 2003. As the results show that SBC has now met the standard for two months, this PM will not be subject to further reporting.	HEPO ¶ 2552 SBC Ex. 2.3 (March 17, 2003 Ehr Surrebuttal) ¶ 14
Public Interest	Remedy Plan	SBC to send CLECs an Accessible Letter advising CLECs of the adoption of the Section 271 Plan.	No due date is set.		HEPO ¶ 3466
Public Interest	PMs	SBC agreed to revise its PM tariff to add submeasures specific to EELs.	SBC stated that it would file this change, as		SBC Ex. 2.1 (Ehr Phase I Compliance Aff.) ¶ 9 and Att. JDE-1

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			well as the other changes agreed to in the six- month collaborative, in late January 2003.		JDE-1
Public Interest	BearingPoint testing	SBC to address deficiencies noted by BearingPoint. BearingPoint to issue status report by November 28, 2003. SBC to respond to any open items, and the Commission to determine the appropriate resolution.	November 28, 2003.		SBC Phase II Brief on Exceptions