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November 12, 2004

BY ELECTRONIC FILING

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Attached please find the CLEC Coalition's Reply to Action Items from the October 28, 2004, Conference Call with staff regarding BellSouth's SQM Six-Month Review in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/scd
Attachment
cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the CLEC's Reply was served by

U.S. Mail this 12th day of November 2004 to the following:

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s/ Tracy W. Hatch

Tracy W. Hatch

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)	
of Operations Support System Permanent)	Docket No. 000121A-TP
Performance Measures for Incumbent)	
Local Exchange Telecommunications)	Filed: November 12, 2004
Companies (BellSouth Track))	
_____)	

CLEC COALITION REPLY TO ACTION ITEMS

Competitive Local Exchange Carriers (“CLECs”), AT&T Communications of the Southern States, LLC; Birch Telecom; DIECA Communications Company d/b/a Covad Communications Company (“Covad”); ITC^DeltaCom Communications, Inc. (“ITC^DeltaCom/BTI”); MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc.; and Network Telephone Corp., hereinafter collectively referred to as the “CLEC Coalition,” hereby file the following responses to the Florida Public Service Commission Staff’s (“Staff’s”) request that answers be supplied for the following Action Items from the October 28, 2004 SQM Six-Month Review conference call:

Action Item 1:

In BellSouth’s September 13, 2004 filing, Item #6, BellSouth proposed to modify its Percent Provisioning Troubles with X days of Service Order measure to 14 days for design services and five days for non-designed services. CLECS to provide response regarding whether UCL loops are designed or non-designed service.

CLEC Response:

Both the CLEC Information Package for the Unbundled Copper Loop – Non Designed (UCL-ND) and the Unbundled Local Loop-Technical Specifications (TR73600) indicate that the UCL-ND loop is provisioned without a Design Layout Report or test points, thereby categorizing it as a non-designed loop. However a Data CLEC’s (DLEC’s) use of this loop is no different from that of a designed loop. The issue then, at least for the DLEC, is the inclusion of UCL-ND loops in the non-designed services category which would result in the application of a 5 day interval in which to determine if provisioning troubles exist and whether they should be captured in the results for the Percent Provisioning Troubles within X Days of Service Order Completion measure.

Al Varner indicated during the October 28 conference call that the rationale behind BellSouth's proposal to apply a 5 day interval to Non-Designed services and a 14 day interval to Designed services was to separate the POTS loops from the Non-POTS loops. It is important to note that the general population considers non-designed loops to be used for providing voice services only. So when BellSouth provisions a non-designed (POTS type) loop to an end-user's premises and that loop is used for voice services, the technician will know right away whether or not the voice service is working or has failed.

The same is not true when BellSouth provisions a UCL-ND loop for a DLEC. The provisioning process is only the first part of the process in providing DSL services. The DLEC's ability to assess the functionality of an end-user's service is dependant upon whether the CPE equipment has been properly installed and configured (the Installation Interval). Since the end-user has 2 choices for installing the CPE equipment, the Installation Interval may be further impacted. The end-user can install the equipment themselves (a self-install) or they can have a Covad technician complete the install for them (a professional install). Obviously a professional installation will require more time to schedule an appointment with the end-user and to dispatch the technician to their premises. Scheduling an appointment alone may add several days to the Installation Interval. It complicates matters even more if the end-user is a no-show because the process must be repeated, in which case, the installation interval will be extended even further.

All things considered, it is clear that an interval of 5 days from BellSouth's completion of the service order does not allow enough time for the DLEC to complete the installation and test the functionality of the service, then isolate possible provisioning troubles in the event the service does not work. For the reasons outlined above, the CLECs request that BellSouth include the UCL-ND loop in the designed services category which would allow a 14 day interval to apply for determining the existence of troubles that may be related to the provisioning process.

Action Item 2:

In BellSouth's September 13, 2004 filing, Item #10, BellSouth provided explanation of why it is proposing to change the standard for measure P7B from 5 hours to diagnostic. CLECs are to respond to BellSouth's rationale.

CLEC Response:

CLECs found BellSouth's response somewhat confusing. First, BellSouth indicated that the troubles often involved complicated repair solutions. It then stated that "only 31 orders" had intervals greater than 5 hours. It is unclear whether BellSouth wants to be relieved of a quality of service obligation because these types of problems are hard to solve or whether they are concerned about small sample size. CLECs strongly object to BellSouth's claims that complexity should permit lack of standards, but are willing to consider the changes to the measure that will permit use of the Small Sample Benchmark Table. CLECs recommend a benchmark of 95% within 2 hours. The change from 100% to 95% addresses the small sample size, and the interval of 2 hours (which was requested in the CLEC Coalition's July 28, 2004 filing) addresses the need for quality service.

Additionally, the CLECs were asked to review BellSouth's revisions to P-7B to determine whether BellSouth's additional calculation in this measure of the "% of Items with No Troubles" eliminated the CLEC need for the additional measure requested in its July 28, 2004 filing entitled "P-7D –Coordinated/Non-Coordinated Customer Conversions -% without Service Disruption.

Response: No, it does not, minimally for the following reasons:

- It has no performance standard.
- It does not include non-coordinated cuts.

Action Item 3:

CLECs to clarify the Verizon measures of Timeliness of Completion Notices filed on October 14, 2004 and provide an example of a performance measures report for these measures.

CLEC Response:

Verizon has three measures related to billing completion notices.

First, measure OR-4-17 - % Billing Completion Notifiers (BCN) sent within two Business Days is described on page 13 of the CLEC Coalition's October 14 filing. This measure is reported for EDI orders only, is reported separately for resale and UNE, but does not provide product specific disaggregation. This measure is included in Verizon's penalty plan.

Second, measure OR-4-11- % Completed Orders with neither a PCN or BCN sent is described on pages 11 and 12 of the CLEC Coalition's October 14 filing. It serves a similar "completeness" purpose as BellSouth's measure O-11 does for FOCs and rejections. This measure is included in Verizon's penalty plan.

Third, measure OR-10 – PON Notifier Exception Resolution Timeliness is described on pages 13 and 14 of the CLEC Coalition's October 14 filing. It measures how quickly trouble tickets for missing notifiers, including billing completion notifiers, are resolved. This measure is included in Verizon's penalty plan.

See Attachment "A " for Verizon's August 2004 performance report for these measures.

Action Item 4:

CLECs to provide a copy of the proposed disaggregation AT&T provided Staff.

CLEC Response:

See Attachment "**B**".

Respectfully submitted this 12th day of November, 2004.

CLEC COALITION

s/ Tracy Hatch

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Carrier to Carrier
Performance Standards and Reports
Verizon Pennsylvania August 2004

CLEC Aggregate Performance
ORDERING - RESALE POTS / SPECIAL SERVICES

Metric #	Standard	Actual Performance CLEC Aggregate	Number of Observations All CLECs
RESALE Pre-Ordering			
PO-3 - Contact Center Availability			
PO-3-02-1000	% Answered within 30 Seconds - Ordering**** &	87.11	14566
PO-3-04-1000	% Answered within 30 Seconds - Repair** &	75.68	145907
RESALE Ordering			
OR-8 - Acknowledgement Timeliness			
OR-8-01-2000	% Acknowledgements on Time	100.00	2780
OR-9 - Order Acknowledgement Completeness			
OR-9-01-2000	% Acknowledgement Completeness	100.00	2780
OR-10 - PON Notifier Exception Resolution Timeliness			
OR-10-01-1000	% of PON Exceptions Resolved Within Three (3) Business Days	99.46	959
OR-10-02-1000	% of PON Exceptions Resolved Within Ten (10) Business Days	100.00	959
POTS & Pre-qualified Complex - Electronically Submitted			
OR-1 - Order Confirmation Timeliness			
OR-1-02-2320	% On Time LSRC - Flow Through	98.45	1874
OR-1-04-2320	% On Time LSRC/ASRC No Facility Check	98.41	439
OR-1-06-2320	% On Time LSRC/ASRC Facility Check	98.61	72
OR-2 - Reject Timeliness			
OR-2-02-2320	% On Time LSR Reject - Flow Through	99.71	1032
OR-2-04-2320	% On Time LSR/ASR Reject No Facility Check	99.25	267
OR-2-06-2320	% On Time LSR/ASR Reject Facility Check	95.83	24
2 Wire Digital Services			
OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification			
OR-1-04-2341	% On Time LSRC/ASRC No Facility Check	92.31	13
OR-1-06-2341	% On Time LSRC/ASRC Facility Check	NA	
OR-2 - Reject Timeliness - Requiring Loop Qualification			
OR-2-04-2341	% On Time LSR/ASR Reject No Facility Check	83.33	6
OR-2-06-2341	% On Time LSR/ASR Reject Facility Check	100.00	2
POTS / Special Services - Aggregate			
OR-3 - Percent Rejects			
OR-3-01-2000	% Rejects	No Standard	36.27
OR-3-02-1000	% LSR Resubmission Not Rejected	95%	100.00
OR-4 - Timeliness of Completion Notification			
OR-4-11-1000	% Completed orders with neither a PCN nor BCN sent	0.25%	1.86
OR-4-16-1000	% Provisioning Completion Notifiers sent within one (1) Business Day	95%	96.92
OR-4-17-1000	% Billing Completion Notifier sent within two (2) Business Days	95%	92.09
OR-5 - Percent Flow-Through			
OR-5-01-2000	% Flow Through - Total	No Standard Developed	76.85
OR-5-03-2000	% Flow Through Achieved	95%	97.06
OR-6 - Order Accuracy			
OR-6-01-2000	% Service Order Accuracy*	95% Orders without Errors	94.01
OR-6-03-2000	% Accuracy - LSRC	not more than 5%	0.00
OR-6-04-2000	% Accuracy - LSR/DSR White Page Listing	98%	TR
OR-7 - Order Completeness			
OR-7-01-2000	% Order Confirmation/Rejects sent within 3 Business Days	95%	99.50
Special Services - Electronically Submitted			
OR-1 - Order Confirmation Timeliness			
OR-1-04-2210	% On Time LSRC/ASRC No Facility Check DS0	95% within 48 Hours	NA
OR-1-04-2211	% On Time LSRC/ASRC No Facility Check DS1	95% within 48 Hours	NA
OR-1-04-2213	% On Time LSRC/ASRC No Facility Check DS3	95% within 48 Hours	NA
OR-1-04-2214	% On Time LSRC/ASRC No Facility Check (Non DS0, DS1, & DS3)	95% within 48 Hours	81.82
OR-1-06-2210	% On Time LSRC/ASRC Facility Check DS0	95% within 72 Hours	NA
OR-1-06-2211	% On Time LSRC/ASRC Facility Check DS1	95% within 72 Hours	NA
OR-1-06-2213	% On Time LSRC/ASRC Facility Check DS3	95% within 72 Hours	NA
OR-1-06-2214	% On Time LSRC/ASRC Facility Check (Non DS0, DS1, & DS3)	95% within 72 Hours	NA
OR-2 - Reject Timeliness			
OR-2-04-2200	% On Time LSR/ASR Reject No Facility Check	95% within 48 Hours	80.00
OR-2-06-2200	% On Time LSR/ASR Reject Facility Check	95% within 72 Hours	NA
Legend Notations defined on Legend sheet - last page			

Carrier to Carrier
Performance Standards and Reports
Verizon Pennsylvania August 2004

CLEC Aggregate Performance
ORDERING - UNE POTS / SPECIAL SERVICES

Metric #	Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
UNE Pre-ordering			
PO-3 - Contact Center Availability			
PO-3-02-1000	% Answered within 30 Seconds - Ordering**** &	80% within 30 Seconds	87.11
PO-3-04-1000	% Answered within 30 Seconds - Repair** &	80% within 30 Seconds	75.68
UNE Ordering			
OR-8 - Acknowledgement Timeliness			
OR-8-01-3000	% Acknowledgements on Time	95% within 2 Hours	100.00
OR-9 - Order Acknowledgement Completeness			
OR-9-01-3000	% Acknowledgement Completeness	95%	100.00
OR-10 - PON Notifier Exception Resolution Timeliness			
OR-10-01-1000	% of PON Exceptions Resolved Within Three (3) Business Days	95% within 3 Business Days	99.48
OR-10-02-1000	% of PON Exceptions Resolved Within Ten (10) Business Days	95% within 10 Business Days	100.00
Platform			
OR-1 - Order Confirmation Timeliness			
OR-1-02-3140	% On Time LSRC - Flow Through	95% within 2 Hours	99.61
OR-1-04-3140	% On Time LSRC/ASRC No Facility Check	95% within 24 Hours	95.04
OR-1-06-3140	% On Time LSRC/ASRC Facility Check	95% within 72 Hours	98.52
OR-2 - Reject Timeliness			
OR-2-02-3140	% On Time LSR Reject - Flow Through	95% within 2 Hours	99.68
OR-2-04-3140	% On Time LSR/ASR Reject No Facility Check	95% within 24 Hours	97.78
OR-2-06-3140	% On Time LSR/ASR Reject Facility Check	95% within 72 Hours	100.00
OR-6 - Order Accuracy			
OR-6-01-3140	% Service Order Accuracy*	95% orders without errors	94.87
OR-6-03-3140	% Accuracy - LSRC	not more than 5%	0.00
OR-6-04-3143	% Accuracy - LSR/DSR White Page Listing	98%	TR
OR-7 - Order Completeness			
OR-7-01-3140	% Order Confirmation/Rejects sent within 3 Business Days	95%	99.92
Loop/Pre-qualified Complex/LNP			
OR-1 - Order Confirmation Timeliness			
OR-1-02-3331	% On Time LSRC - Flow Through	95% within 2 Hours	99.72
OR-1-04-3331	% On Time LSRC/ASRC No Facility Check	95% within 24 Hours	98.72
OR-1-06-3331	% On Time LSRC/ASRC Facility Check	95% within 72 Hours	98.10
OR-2 - Reject Timeliness			
OR-2-02-3331	% On Time LSR Reject - Flow Through	95% within 2 Hours	99.74
OR-2-04-3331	% On Time LSR/ASR Reject No Facility Check	95% within 24 Hours	99.81
OR-2-06-3331	% On Time LSR/ASR Reject Facility Check	95% within 72 Hours	100.00
OR-6 - Order Accuracy			
OR-6-01-3331	% Service Order Accuracy*	95% orders without errors	95.22
OR-6-03-3331	% Accuracy - LSRC	not more than 5%	0.00
OR-6-04-3331	% Accuracy - LSR/DSR White Page Listing	98%	TR
OR-7 - Order Completeness			
OR-7-01-3331	% Order Confirmation/Rejects sent within 3 Business Days	95%	99.87
2 Wire Digital Services			
OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification			
OR-1-04-3341	% On Time LSRC/ASRC No Facility Check	95% within 72 Hours	100.00
OR-1-06-3341	% On Time LSRC/ASRC Facility Check	95% within 72 Hours	100.00
OR-2 - Reject Timeliness - Requiring Loop Qualification			
OR-2-04-3341	% On Time LSR/ASR Reject No Facility Check	95% within 72 Hours	100.00
OR-2-06-3341	% On Time LSR/ASR Reject Facility Check	95% within 72 Hours	NA
2 Wire xDSL Loops			
OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification			
OR-1-04-3342	% On Time LSRC/ASRC No Facility Check	95% within 72 Hours	100.00
OR-1-06-3342	% On Time LSRC/ASRC - Facility Check	95% within 72 Hours	100.00
OR-2 - Reject Timeliness - Requiring Loop Qualification			
OR-2-04-3342	% On Time LSR/ASR Reject No Facility Check	95% within 72 Hours	100.00
OR-2-06-3342	% On Time LSR/ASR Reject Facility Check	95% within 72 Hours	NA
2 Wire xDSL Line Sharing & Line Splitting			
OR-1 - Order Confirmation Timeliness - Requiring Loop Qualification			
OR-1-04-3340	% On Time LSRC/ASRC No Facility Check	95% within 72 Hours	100.00
OR-1-06-3340	% On Time LSRC/ASRC - Facility Check	95% within 72 Hours	NA
OR-2 - Reject Timeliness - Requiring Loop Qualification			
OR-2-04-3340	% On Time LSR/ASR Reject No Facility Check	95% within 72 Hours	100.00
OR-2-06-3340	% On Time LSR/ASR Reject Facility Check	95% within 72 Hours	NA

continued

Carrier to Carrier
Performance Standards and Reports
Verizon Pennsylvania August 2004

CLEC Aggregate Performance
ORDERING - UNE POTS / SPECIAL SERVICES

POTS / Special Services - Aggregate

Metric #	Standard	CLEC Aggregate Performance	CLEC Aggregate Observations
OR-3 - Percent Rejects			
OR-3-01-3000	% Rejects (ASRs + LSRs)	15.53	149413
OR-3-02-1000	% LSR Resubmission Not Rejected	100.00	6
OR-4 - Timeliness of Completion Notification			
OR-4-11-1000	% Completed orders with neither a PCN nor BCN sent	1.86	95116
OR-4-16-1000	% Provisioning Completion: Notifiers sent within one (1) Business Day	96.92	95116
OR-4-17-1000	% Billing Completion Notifier sent within two (2) Business Days	92.09	95116
OR-5 - Percent Flow-Through			
OR-5-01-3000	% Flow Through - Total	91.05	124947
OR-5-03-3000	% Flow Through Achieved	96.86	117450
Special Services - Electronically Submitted			
OR-1 - Order Confirmation Timeliness (ASRs + LSRs)			
OR-1-04-3210	% On Time LSRC/ASRC No Facility Check DS0	100.00	1
OR-1-06-3210	% On Time LSRC/ASRC Facility Check DS0	NA	
OR-1-06-3211	% On Time LSRC/ASRC Facility Check DS1	97.79	589
OR-1-06-3213	% On Time LSRC/ASRC Facility Check DS3	80.36	56
OR-1-06-3214	% On Time LSRC/ASRC Facility Check (Non DS0, Non DS1, & Non DS3)	80.00	5
OR-2 - Reject Timeliness (ASRs + LSRs)			
OR-2-04-3200	% On Time LSR/ASR Reject No Facility Check	95.65	46
OR-2-06-3200	% On Time LSR/ASR Reject Facility Check	97.62	126
Special Services - FAX/MAIL Submitted			
OR-1 - Order Confirmation Timeliness			
OR-1-08-3210	% On Time ASRC No Facility Check DS0	NA	
OR-1-10-3210	% On Time ASRC Facility Check DS0	NA	
OR-1-10-3211	% On Time ASRC Facility Check DS1	NA	
OR-1-10-3213	% On Time ASRC Facility Check DS3	NA	
OR-1-10-3214	% On Time ASRC Facility Check (Non DS0, Non DS1, & Non DS3)	NA	
OR-2 - Reject Timeliness			
OR-2-08-3200	% On Time ASR Reject No Facility Check	NA	
OR-2-10-3200	% On Time ASR Reject Facility Check	NA	
Legend Notations Instructions defined on Legend sheet - last page			


**Carrier to Carrier
Performance Standards and Reports
Verizon Pennsylvania August 2004**

LEGEND

* = Verizon South (PA, DE, NJ, MD, VA, WV and DC)
** = Verizon East (CT, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VT, VA, WV and DC)
*** = PA only
**** = Verizon South minus NJ (PA, DE, VA, MD, DC, WV)
***** = NJ, PA and DE
***** = NY and CT combined (CLEC result only)
+ = Enview used to report Retail and Wholesale results
TR = Temporary PA DLWP Review
1 = 80% for December 2001 and January 2002 data months
= 85% for February and March 2002 data months
= 90% for April and May 2002 data months
= 95% for June 2002 and forward data months
UD = Performance metric is under development
UR = Performance metric is under review
NA = No Activity or Results cannot be calculated due to zero in the Denominator
NEF = No Existing Functionality
TBD = Performance standard is to be determined
R3 = Run 3 times per year (Feb, Jun & Oct)
I/C/W MRAs = Parity to be assessed in conjunction with missed appointments
1-9=5, 10+=Negotiated = 1-9 Loops, 5 days
10+ Loops, Negotiated
95% Completed Within Window = Standard for Cut-Over Window
1 to 9 lines: 1 hour
10 to 49 lines: 2 hours
50 to 99 lines: 3 hours
100 to 199 lines: 4 hours
200 plus lines: 8 hours
EEL = 1-9 Loops, 15 days
10+, Negotiated
No Facilities, ECCD+15 Days
Disconnects, 2 Days
IOF = Facilities Check, 72 Hours
Facilities Available (Quantity 1-8), 15 Days
Facilities Available (Quantity > 8), Negotiated
Facilities Not Available, Negotiated
Jeopardy = 100% at least 24 hours before due date with facilities
100% at least 48 hours before due date without facilities

Statistical Score Explanations

SS
= Sample size does not meet the minimum criteria for a statistical test specified in Appendix K of the guidelines. See Appendix K of the C2C Guidelines regarding monitoring and further evaluation.

 = Stat Score calculated using Log Gamma macro pursuant to Appendix K of the C2C Guidelines (Stat Scores of 5 or -5 indicate that the result of the macro is an extremely large positive or negative number)

ORDERING	
SQM & SEEM Level of Disaggregation	
Resale – Residence.....	Fully Mechanized:
Resale – Business.....	Partially Mechanized:
Resale – Design (Special).....	Non Mechanized:
Resale Other	
Resale PBX (capture under Resale Other)	
Resale Centrex (capture under Resale Other)	
Resale ISDN (capture under Resale Other)	
LNP (Standalone)	
INP (Standalone) capture under LNP(Standalone)	
2W Analog Loop Design	
2W Analog Loop Non-Design	
2W Analog Loop with INP Design (capture under 2W Analog Loop w/LNP Dsg)	
2W Analog Loop with INP Non-Design (capture under 2W Analog Loop w/LNP NonDsg)	
2W Analog Loop with LNP Design	
2W Analog Loop with LNP Non-Design	
UNE Digital Loop <= DS1	
UNE Digital Loop >= DS1	
UNE Loop + Port Combinations	
UNE Combination Other	
UNE ISDN Loop	
UNE Other Design	
UNE Other Non-Design	
UNE Line Splitting	
EELs	
Switch Ports	
UNE xDSL (ADSL, HDSL, UCL)	
Line Sharing	
Local Interoffice Transport	
Local Interconnection Trunks.....	

PROVISIONING	
SQM & SEEM Level of Disaggregation	
Resale – Residence.....	Fully Mechanized: Hour
Resale – Business.....	Partially Mechanized:
Resale – Design (Special).....	Non Mechanized:
Retail Other	
Resale-PBX (capture under Resale Other)	
Resale-Centrex (capture under Resale Other)	
Resale-ISDN (capture under Resale Other)	
LNP (Standalone)	
LNP (Standalone) (capture under LNP(Standalone))	
2W Analog Loop Design	
2W Analog Loop Non-Design	
2W Analog Loop with LNP Design (capture under LNP Design)	
2W Analog Loop with LNP Non-Design (capture under LNP Non-Design)	
2W Analog Loop with LNP Design	
2W Analog Loop with LNP Non-Design	
UNE-Digital Loop <- DS1	
UNE Digital Loop >= DS1	
UNE Loop + Port Combinations	
UNE Combination Other	
UNE ISDN Loop	
UNE Other Design	
UNE Other Non-Design	
UNE Line Splitting	
EELs	
Switch Ports	
UNE xDSL (ADSL, HDSL, UCL)	
Line Sharing	
Local Interoffice Transport	
Local Interconnection Trunks	

MAINTENANCE
SQM & SEEM Level of Disaggregation
Resale Residence
Resale Business
Resale Design
Resale Other
Resale PBX (capture under Resale Other)
Resale Centrex (capture under Resale Other)
Resale ISDN (capture under Resale Other)
2W Analog Loop Design
2W Analog Loop Non - Design
UNE Digital Loop < DS1
UNE Digital Loop >= DS1
UNE Loop + Port Combinations
UNE Switch ports
UNE Combo Other
UNE xDSL (HDSL, ADSL and UCL)
UNE ISDN
UNE Line Sharing
UNE Other Design
UNE Other Non-Design
Local Interconnection Trunks