

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (CENTURYLINK FLORIDA TRACK)

DOCKET NO. 000121B-TP
ORDER NO. PSC-13-0216-PAA-TP
ISSUED: May 22, 2013

The following Commissioners participated in the disposition of this matter:

RONALD A. BRISÉ, Chairman
LISA POLAK EDGAR
ART GRAHAM
EDUARDO E. BALBIS
JULIE I. BROWN

NOTICE OF PROPOSED AGENCY ACTION ORDER
APPROVING REVISIONS TO CENTURYLINK'S
PERFORMANCE MEASUREMENT PLAN

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code (F.A.C.).

Case Background

By Order No. PSC-03-0067-PAA-TP, issued January 9, 2003, we adopted wholesale permanent performance measures for the CenturyLink Florida Track, Docket Number 000121B-TP. CenturyLink's Performance Measurement Plan (PMP) is a monitoring device that measures the level of wholesale service performance that CenturyLink provides to CLECs. It also establishes a standard against which CLECs and the Florida Public Service Commission (FPSC or Commission) can measure performance over time to detect and correct any degradation of service provided to CLECs.

CenturyLink's Florida PMP included the adoption of the August 2002 CenturyLink Nevada PMP as well as administrative provisions and an associated compliance methodology. CenturyLink complied with the Order and implemented the Florida PMP on February 1, 2003.

By Order No. PSC-03-1438-PAA-TP, issued December 22, 2003, we approved revisions to CenturyLink's Florida PMP to coincide with revisions to CenturyLink's Nevada PMP. The revisions were effective beginning with February 2004 data. Further revisions to CenturyLink's Florida PMP were approved by this Commission by Order No. PSC-07-0123-PAA-TP, issued February 12, 2007. These revisions were approved by the Public Utilities Commission of Nevada (Nevada Commission) on August 2, 2006.

Jurisdiction

Section 364.16(2), Florida Statutes (F.S.), provides, in part, that the Commission shall exercise its exclusive jurisdiction in order to ensure that all providers of telecommunications service are treated fairly by preventing anticompetitive behavior. Furthermore, it is noted that the FCC has encouraged the states to implement performance metrics and oversight for purposes of evaluating the status of competition under the Telecommunications Act of 1996.

Revisions to CenturyLink's Florida Wholesale Performance Measurement Plan

On February 1, 2013, Embarq Florida, Inc. d/b/a CenturyLink (CenturyLink) filed a request to approve revisions to its wholesale Performance Measurement Plan. The proposed revisions address the majority of the categories covered in the plan, such as: Pre-Ordering, Ordering, Provisioning, Maintenance, Network Performance, Billing and Database Updates. CenturyLink is proposing to remove two Provisioning measures (Coordinated Customer Conversion as a Percentage On Time and Hold Order Interval) and one Billing measure (Usage Timeliness). Additionally, CenturyLink is proposing to clarify and update business rules within sections of its Performance Measurement Plan.

The proposed revisions are the same as those provided in CenturyLink's Performance Measurement Plan to the Nevada Commission and are the result of a stipulation entered into by parties to the Nevada docket.¹ The Nevada docket was opened at CenturyLink's request to amend its performance measures and standards. The Nevada Commission concluded that it was in the public interest to accept the stipulation. The revisions were approved by the Nevada Commission on December 11, 2012, and scheduled to be implemented with the July, 2013, data.

By Order No. PSC-03-0067-PAA-TP, any changes to CenturyLink's performance measurements approved by other states are to be brought before this Commission to allow our staff and CLECs an opportunity to review and comment on such revisions before being implemented in Florida. On February 21, 2013, our staff solicited comments from the CLECs for review of CenturyLink's Florida Performance Measurement Plan revisions. Requested comments were to be filed in Docket No. 000121B-TP by March 20, 2013.

¹ The parties to the stipulation in Nevada included: Central Telephone Company d/b/a CenturyLink (Nevada), Cox Nevada Telecom, LLC, U.S. Telepacific Corp. (Nevada), Mpower Communications Corp., tw telecom of Nevada LLC, and the Public Utilities Commission of Nevada's Regulatory Operations Staff.

CompSouth filed comments identifying objections and concerns regarding certain elements of the plan.² On April 4, 2013, CenturyLink filed reply comments addressing CompSouth's issues. Our staff held three informal teleconferences on March 12, April 15, and April 24, 2013 to discuss the filed comments and attempt to eliminate any misunderstandings between the parties. As a result of our staff's first call, CenturyLink refiled two corrected pages of its PMP plan on March 15, 2013. This correction removed references to discontinuance of CenturyLink's root cause analysis reporting that it provides to the Commission on a monthly basis.³

On April 30, 2013, CompSouth filed a letter notifying the Commission that it had reached an impasse with CenturyLink and that further discussions of its issues would not be productive. CompSouth also stated in its letter that it "would like to suggest that a staff management audit or other third party audit of CenturyLink's performance measures, as originally contemplated by [Order] Nos. PSC-03-0067-PAA-TP and PSC-03-1438-PAA-TP, may be warranted." Order No. PSC-03-0067-PAA-TP provides, in part, "(a)fter the first five years, a comprehensive third-party audit shall only be performed when sufficient evidence has been provided to us to order such an audit." Our staff determined that sufficient evidence was not submitted to the Commission by CompSouth to warrant a staff management or third party audit at this time.

After analysis of CenturyLink's proposed PMP revisions, analysis of the comments filed by CompSouth and CenturyLink, and discussions with CenturyLink and CompSouth, our Staff recommended that this Commission approve CenturyLink's proposed revisions upon clarifying language being added to Measure 17 of CenturyLink's PMP, specifying that a trouble ticket will be captured in the month that it is closed.

We have reviewed CenturyLink's redlined version of its revised Florida wholesale PMP, as summarized in Attachment 1, and detailed in CenturyLink's proposal filed on February 1, 2013, and amended on March 15, 2013, and the comments filed by CenturyLink and CompSouth. We find CenturyLink's proposed revisions, as amended by CenturyLink on March 15, 2013, along with the inclusion of clarifying language to Measure 17 of the PMP, to be in the public interest. Attachment 1 reflects the changes contained in CenturyLink's redlined version of its PMP. Therefore, the changes to CenturyLink's PMP, as amended by CenturyLink on March 15, 2013, along with the inclusion of clarifying language to Measure 17 of the PMP, are hereby adopted in Florida.

² CompSouth is a coalition of CLECs in the Southeast. Its current members include: Access Point, Inc.; Birch Communications, Inc.; Cbeyond Communications, LLC; DeltaCom, LLC d/b/a EarthLink Business; Level 3 Communications, LLC; MegaPath Corporation; Windstream; and XO Communications Services, LLC.

³ Unlike Nevada, CenturyLink's Florida plan does not include a Performance Incentive Plan containing payment penalties associated with failing to meet established parity or benchmark standards.

Decision

We hereby approve the revisions to CenturyLink's Florida Performance Measurement Plan as summarized in Attachment 1 and detailed in CenturyLink's redlined proposal filed February 1, 2013, as modified on March 15, 2013, and with clarifying language added to Measure 17a, specifying that a trouble ticket will be captured in the month that it is closed. In addition, the implementation of the revisions to CenturyLink's Florida Performance Measurement Plan shall become effective beginning with the July 2013 data month to enable simultaneous implementation of changes with CenturyLink's Nevada Performance Measurement Plan.

Based on the foregoing, it is


ORDERED by the Florida Public Service Commission that revisions to CenturyLink's Performance Measurement Plan as set forth in Attachment 1 are hereby approved and incorporated into this Order. It is further

ORDERED that the implementation of the revisions to CenturyLink's Florida Performance Measurement Plan shall become effective beginning with the July 2013 data month to enable simultaneous implementation of changes with CenturyLink's Nevada Performance Measurement Plan.

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Office of the Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, this docket shall remain open to conduct periodic reviews of CenturyLink's Performance Measurement Plan and to complete any third-party audits as outlined in Order No. PSC-03-0067-PAA-TP.

By ORDER of the Florida Public Service Commission this 22nd day of May, 2013.



HONG WANG
Chief Deputy Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770
www.floridapsc.com

Copies furnished: A copy of this document is provided to the parties of record at the time of issuance and, if applicable, interested persons.

KFC

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on June 12, 2013.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

**CenturyLink's 2013 Florida
Performance Measurement Plan (PMP) and Change Appendix**

System	Metric	CenturyLink Proposed Change Feb 2013
Pre-Ordering	<p>PM-1 Average Response Time to Pre-Order Queries- Measures the elapsed time from CenturyLink's receipt of the query from the CLEC, whether or not it is in correct syntax, to the time CenturyLink returns the requested data to the CLEC.</p>	<p>Change Measure 1 to diagnostic – Pre-order queries are measured in only a matter of seconds and the timeframe to return such data has minimal, if any, impact on the CLEC customer.</p> <p>Update business rules regarding Simple/Complex; removed note; update/eliminate sub-measures consistent with the move from the IRES ordering system to the EASE ordering system.</p>
Ordering	<p>PM-2 – Average Firm Order Confirmation (FOC) Notice Interval – Measures the average time from receipt of a valid service request to returning a Firm Order Confirmation (FOC)</p>	<p>Adopt proposed benchmark standards – The products and sub-measures in this measure were previously measured from the IRES ordering system. CenturyLink has updated its ordering system to the EASE system. Additionally, EASE is now integrated with new back office systems. Since orders are handled differently in the new systems, CenturyLink has updated the benchmarks accordingly. Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p>
Ordering	<p>PM-3 – Average Reject Notice Interval – Reject interval is the elapsed time between CenturyLink's receipt of an order from the CLEC to CenturyLink's return of a notice of a rejection to the CLEC.</p>	<p>Adopt proposed benchmark standards; remove syntax and content errors – The sub-measures were previously measured from the IRES ordering system and are now measured through the EASE ordering system. EASE is now integrated with new back office systems. Since orders are handled differently in the new systems, CenturyLink has updated the benchmarks accordingly.</p>
Ordering	<p>PM-4 – Percent of Flow-Through Orders – Measures the percentage of mechanized service orders processed on a flow through basis, i.e., orders that can get to the FOC status without manual intervention.</p>	<p>Remove UNE Sub Loops Voice Grade and UNE Sub Loops Data and make changes needed to accommodate the change from IRES to EASE. Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p>

System	Metric	CenturyLink Proposed Change Feb 2013
Provisioning	PM-5 – Percentage of Orders Jeopardized – Percentage of total orders processed for which CenturyLink notifies the CLEC that the work will not be completed by the due date committed on the FOC.	Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.
Provisioning	PM-6- Average Jeopardy Notice Interval – Measures the remaining time between the pre-existing committed order completion date communicated via the FOC and the date CenturyLink issues a notice to the CLEC indicating an order is in jeopardy of missing the due date (or the due date has been missed).	Change to diagnostic – Measuring due dates is a better indication of installation timeliness than simply measuring how early notices are sent for orders in jeopardy of missing their associated due dates; which is all this measure is doing. CenturyLink proposes to continue to track the average jeopardy notice interval. Stop reporting by Jeopardy type and change method of calculation – These changes are necessary to align with the retail comparative. Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.
Provisioning	PM-7 – Average Completed Interval – Average business days from receipt of valid, error-free service request to completion date in service order system for new, move and change orders.	Establish benchmark for UNE Loops-xDSL Provisioned-No Field Work at 3.5 days. Clarify the existing benchmark for UNE Loops – Designed No Field Work. Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.
Provisioning	PM-8 – Percent Completed within Standard Interval – Measures orders completed within the standard interval of receipt of valid, error-free service request.	Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.

System	Metric	CenturyLink Proposed Change Feb 2013
Provisioning	<p>PM-9 – Coordinated Customer Conversion as a Percentage On Time – Measures the percentage of coordinated cutovers started on time where CLEC has requested timed coordination.</p>	<p>Eliminate Measure 9 – CenturyLink receives very few requests from CLECs for timed, coordinated Customer Conversions. Therefore, reporting results is burdensome and statistically insignificant. Any service orders received for conversion are also reported in Measure 7 as an Average Completion Interval which is a better representation of the timeliness of CenturyLink provisioning.</p>
Provisioning	<p>PM-11 – Percent of Due Dates Missed – Measures the percent of new, move and change orders where installation was not completed by the due date.</p>	<p>Clarify existing benchmark for ‘UNE Loops – Designed No Field Work’ Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn’t received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p>
Provisioning	<p>PM-12 – Percent of Due Dates Missed Due to Lack of Facilities – Measures the percent of new, move and change orders missed due to lack of facilities</p>	<p>Change to diagnostic. The performance dimension addressed in this measure is already being captured as part of Measure 11 (Percent of Due Dates Missed). Thus Measure 12 is double counting in the few cases where due dates are missed because of the lack of facilities. Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn’t received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p>

System	Metric	CenturyLink Proposed Change Feb 2013
Provisioning	<p>PM-13 – Delay Order Interval to Completion Date (For Lack of Facilities) - Measures the average calendar days from due date to completion date on company missed orders, due to lack of ILEC facilities.</p>	<p>Remove limitation regarding orders delayed due to lack of facilities. By removing this limitation, CenturyLink will capture all orders that are delayed due to CenturyLink reasons past the committed due date and not just those delayed due to lack of facilities. Since the TRRO was issued in 2004, the need to track orders delayed due to facilities has become less important. The TRRO specifies that ILECs are not required to provide cable facilities where none exist in order to provision an unbundled network element.</p> <p>Remove disaggregations by calendar days.</p> <p>Add a diagnostic sub-measure of the duration, from missed due date to completion, for all orders delayed for facilities reasons. It is for information only and therefore considered diagnostic.</p> <p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p>
Provisioning	<p>PM-14 – Held Order Interval – Measures the time period that service orders are not completed by the original due dates for all ILEC reasons (including lack of facilities).</p>	<p>Eliminate Measure 14. With the proposed adjustment to Measure 13 removing the limitation due to lack of facilities, Measure 14 will be redundant. The only difference is that Measure 13 tracks the delay at completion and Measure 14 tracks the delay at the end of each month. Measure 13 is preferable because it is more important to know how long orders are delayed before the service is delivered than how many average delayed days exist at the end of any given month.</p>
Provisioning	<p>PM-15 – Provisioning Trouble Reports Prior to Service Order Completion – Measures the percent of troubles that are reported (via end user customer or indirectly by CLEC) that occur during the provisioning process.</p>	<p>Change to diagnostic. For the last 3 years, CenturyLink has had a record of 99.9% for successful orders without provisioning troubles and therefore proposes to measure this as diagnostic only.</p> <p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p>

System	Metric	CenturyLink Proposed Change Feb 2013
Provisioning	<p>PM-17a – Percentage Troubles in 5 Days for New Orders – Measures the percent of network customer trouble reports received within 5 calendar days of service order completion.</p>	<p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p> <p>Excludes cancelled tickets.</p>
Provisioning	<p>PM-18 – Average Completion Notice Interval – Measures the average time per order to issue notification to CLEC of a completed order.</p>	<p>Change to diagnostic and remove benchmarks. The completion notice interval has no impact on the CLEC end user customer. The timeframe to provide this notice is also not an indication of the level of service provided by CenturyLink in actually completing the order.</p>
Maintenance	<p>PM-19 – Customer Trouble Report Rate – Measures the total number of network customer trouble reports received within a calendar month per 100 circuits/UNEs (unbundled network elements).</p>	<p>Change to diagnostic. Performance of this metric is essentially “parity by design” as CenturyLink serves both retail customers and CLECs with the same network, processes, systems and technicians and cannot systematically discriminate against CLECs.</p> <p>Update business rules to count LNP troubles once, if also associated with a product trouble report captured in this measure.</p> <p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p> <p>Pursuant to the TRRO, ILECs are no longer required to offer Line Sharing as a UNE</p>

System	Metric	CenturyLink Proposed Change Feb 2013
Maintenance	<p>PM-20 – Percentage of Customer Trouble Not Resolved Within Estimated Time – Measures the percent of trouble reports not cleared by the commitment time.</p>	<p>Change to diagnostic. Measure 20 is correlated with Measure 21 and when a customer issue is not resolved within the estimated time, Measure 21 (Average Time To Restore) could also be missed. Therefore, CenturyLink proposes to provide this measure as diagnostic only.</p> <p>Count LNP troubles once, if also associated with a product trouble report counted in this measure.</p> <p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p> <p>Pursuant to the TRRO, ILECs are no longer required to offer Line Sharing as a UNE</p>
Maintenance	<p>PM-21 – Average Time To Restore – Measures the average duration of customer trouble reports from the receipt of the customer trouble report to the time the trouble is cleared.</p>	<p>Count LNP troubles once, if also associated with a product trouble report counted in this measure.</p> <p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn't received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p> <p>Pursuant to the TRRO, ILECs are no longer required to offer Line Sharing as a UNE</p>

System	Metric	CenturyLink Proposed Change Feb 2013
Maintenance	PM-22 – POTS Out of Service Less Than 24 Hours – Measures the percent of POTS out-of-service trouble reports cleared in less than 24 hours.	<p>Change to diagnostic. This measure only includes POTS products and therefore Measure 21 (Average Time To Restore) is a better indication of performance. Thus, CenturyLink proposes that this measure be reported on a diagnostic basis.</p> <p>Remove UNE Loops Non-Designed from the “Measurable Standard” as the description of Measure 22 in the PMP specifies its focus as being on POTS out of service and UNE Loops are not POTS products. Therefore, CenturyLink proposes elimination of the UNE Loops Non-Designed measurable standard from reporting for Measure 22.</p> <p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn’t received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p>
Maintenance	PM-23 – Frequency of Repeat Troubles in 30 Day Period – Measures the percent of customer network trouble reports received within 30 calendar days of a previous report.	<p>Count LNP troubles once, if also associated with a product trouble report counted in this measure.</p> <p>Eliminate UNE Sub-Loops and UNE Ports from measurable standards. Pursuant to the TRRO, ILECs are no longer required to offer UNE Ports as a UNE. CenturyLink hasn’t received orders or tickets for UNE sub-loops in the previous 3 years of reporting. There is no demand for this product and as such, CenturyLink is requesting it be eliminated from reporting.</p> <p>Pursuant to the TRRO, ILECs are no longer required to offer Line Sharing as a UNE</p>
Network Performance	PM-24 – Percent Blocking on Common Trunks – Measures the total percentage of blockage across all common and shared transport trunk groups exceeding 1% blockage.	Change to diagnostic. – Performance in this measure is “parity by design” as evident in its definition in the PMP, where only one number is reported and that number represents the experience of both CenturyLink and any other party that uses the Common Trunks.
Network Performance	PM-25 – Percent Blocking on Interconnection Trunks – Measures the total percent of blockage on final dedicated interconnection trunk groups exceeding 1% blockage.	Change to diagnostic. – Interconnection is a unique category in comparison to most other measures or products, because it involves reciprocal implementation obligations on the part of both CenturyLink and CLECS, and it has mutual resulting impacts, that by themselves create more-than-sufficient incentives to appropriately manage trunk blocking. Accordingly, CenturyLink proposes that Measure 25 be considered diagnostic only.

System	Metric	CenturyLink Proposed Change Feb 2013
Network Performance	PM-26 – NXX Loaded by LERG Effective Date – Measures the number of NXXs loaded and tested by the LERG (Local Exchange Routing Guide) effective date.	Change to diagnostic. – CLEC networks are now essentially established, and therefore relatively few code openings are occurring. Moreover CenturyLink and CLECs have an inherent, mutual interest in managing NXX activations, because customers of both may be affected.
	PM-28 – Usage Timeliness – This measure captures the elapsed time between the recording of usage data generated either by CLEC retail customers or access usage associated with CLEC customers and the time when the data set, in a compliant format, is available for transmission to the CLEC.	Eliminate Measure 28. – This measure has proven to be unnecessary for regulatory focus and attention. Usage timeliness is not end-user customer affecting, and CLECs do not depend on a strict time interval (e.g., the 5 days addressed in this measure) for receiving usage feeds. Instead, many CLECs only access their usage records once a week or once a month, because they do not bill their end users daily for usage but rather on a monthly basis. Additionally, CLECs that operate on a flat-rate basis with their customers do not need to access these records at all. Therefore, CenturyLink proposes to eliminate this measure.
Billing	PM-30 – Wholesale Bill Timeliness – This measure captures the elapsed number of calendar days between the scheduled close of a Bill Cycle and CenturyLink’s transmission of availability of the associated invoice to the CLEC.	CenturyLink has proposed no changes to this measure.
Billing	PM-31 – Usage Completeness – Measures the percentage of usage charges appearing on the correct bill, i.e., next available bill.	Modify the business rules to exclude all long-duration calls. Currently only resale long-duration calls are excluded but the effect of such calls is the same for all measurable standards and thus all should be excluded. (Long duration calls are defined as calls that remain connected through two successive midnights.)
Billing	PM-32 – Recurring Charge Completeness – Measures the percentage of fractional recurring charges appearing on the correct bill, i.e. the next available bill.	Add a business rule to exclude zero dollar billing charges. There is no adverse impact to CLEC customers when zero-dollar charges appear on the bill in a later billing period. Accordingly, CenturyLink proposes excluding “zero dollar billing charges” from this measure.
Billing	PM-33 – Non-Recurring Charge Completeness – Measures the percentage of non-recurring charges appearing on the correct bill, i.e., the next available bill.	Add a business rule to exclude zero dollar billing charges. There is no adverse impact to CLEC customers when zero-dollar charges appear on the bill in a later billing period. Accordingly, CenturyLink proposes excluding “zero dollar billing charges” from this measure.
Billing	PM-34 – Bill Accuracy – Measures the percentage of the total bill amount that is not adjusted by correcting service orders or adjustments on a rolling six month average.	This measure is currently diagnostic only and therefore CenturyLink proposes removing references to benchmarks.

System	Metric	CenturyLink Proposed Change Feb 2013
Database Updates	PM-38 – Percent Database Accuracy – The percentage of E911 records that was updated by CenturyLink in error. The data required to calculate this measurement will be provided by the CLEC. The CLEC will provide the number of records transmitted and the errors found.	Change to diagnostic. – From January 2010 through November 2012, CenturyLink has had a record of 100% and therefore proposes this measure be diagnostic only.
Database Updates	PM-39 – E911 MS Database Update – Measures the percentage of E911 database updates completed within 48 24 hours.	Update the description and calculation from 48 hours to 24 hours and change to diagnostic. – From January 2010 through November 2012, CenturyLink has had a record of 99.99% and therefore proposes this measure be diagnostic only.
Collocation	PM-40 – Time to Respond to a Collocation Request – Measures the percentage of time CenturyLink responds to a CLEC complete collocation request, within the allotted time.	CLECs are now well established in collocation arrangements. Further, collocation activity is not CLEC customer impacting, and its volume has dropped significantly since originally included in the plan. CenturyLink proposes to continue to track this measure on a diagnostic only basis.
Collocation	PM-41 – Time to Provide a Collocation Arrangement – Measures the percentage of time CenturyLink responds to the CLEC approved collocations request, within the allotted time. Approved means CenturyLink approves the application and has received from the CLEC either financial payment or a bond.	CLECs are now well established in collocation arrangements. Further, collocation activity is not CLEC customer impacting, and its volume has dropped significantly since originally included in the plan. CenturyLink proposes to continue to track this measure on a diagnostic only basis.
Interface	PM-42 – Percentage of Time Interface is Available – Measures percent of time OSS interface is available compared to scheduled availability.	CenturyLink replaces the reference to the IRES ordering system with the EASE ordering system.
Interface	PM-44 – Center Responsiveness – Measures the average time it takes CenturyLink’s work center to answer a call.	Update the method of calculation consistent with existing benchmark. That is, clarify the calculation for Ordering Center reflects the benchmark of 80% within 20 seconds.
Provisioning	Missed Appointment Reason Codes within various Provisioning Measures	In the list of codes which are outside of CenturyLink’s control, include Inclement Weather Delayed Installation as an excludable code because CenturyLink should not be responsible for missed due dates because inclement weather delayed an installation.
Multiple	TRRO – FCC rules dictate that DS-1 and DS-3 loops and transport are no longer unbundled network elements in non-impaired wire centers	CenturyLink proposes that the products subject to TRRO relief shall be excluded from measurement and/or reporting in the non-impaired wire centers approved or accepted as such by the Florida Commission.

* Content provided by CenturyLink; items on which CenturyLink and CompSouth disagree are in bold type.