April 2, 2001

By Electronic Mail
Ms. Kathleen A. Cummings
Deputy Director
Division of Communications
State Corporation Commission
1300 E. Main Street
Richmond, Virginia 23219

Re: Performance Standards Collaborative

Dear Ms. Cummings:

      Attached please find WorldCom's Proposed Additions and Changes to Verizon's Virginia Metric Guidelines. WorldCom is serving this filing on the members of the Performance Metrics Collaborative via e-mail.

      Thank you for your assistance in this regard.

Sincerely yours,

Vishwa B. Link

WorldCom Proposed Additions and Changes
to VZ's VA Metrics Guidelines

Metric	Addition to VA Proposal	Modification of VA Proposal
PO-1		Keep OSS test footnote. VZ should have improved on parity plus 7 seconds standard for GUI per PA PUC's 12/99 order and should not be given until 2002 to do so.
PO 1-06	Add statement that describes time to pull up full loop makeup information, not just a statement of qualified or not qualified.	xDSL loop qualification should be measured separately from other facilities qualification queries.
PO 1-08	Add NY Time Out Measurement and 0.33% standard.	
PO 2-02		Report scheduled down time excluded each month. Need to show that differing prime time for both VZ and CLECs are preserved from disruption on a parity basis. Prime time should be defined as hours between 6 a.m. to midnight like NY rules require.
PO-3		Are all help desks included (e.g., Wholesale Customer Care Center and RETAS Help Desk)?
PO 8-01		See footnote on implementation through change management process. Please provide more specific implementation time. The change control process was begun last year in NY for this metric.
	Add new metrics: (1) % Missing Notifier Trouble Tickets Cleared in 3 Days (2) % Other Trouble Tickets Cleared in 5 Days (3) Add metric on % Web GUI Outage/Slowdown Tickets Cleared in 24 Hours	
OR-1 (OR-2)		SOP down time: Should this much time be excluded? Isn't VZ moving to process with less SOP downtime?
OR 1-19		Change business rules and calculation so that interval applies no matter whether Trunk Group Service Request is emailed or faxed or if CLEC negotiates agreement that it would send the ASR for inbound VZ to CLEC trunks. Business rules should define when a negative response would be appropriate and negative responses should not count as timely responses. Report Average Interval for Greater than 192 trunks (projects) or set standard interval.
OR-4-02		Keep OSS standard.
OR 4-05	Add business rule that WFA will be used when completions are recorded in WFA. For all other orders SOP (Expresstrack) entry will be used.	Explain why completions have to be batched so that PA interval of 95% within 30 minutes of physical work completion cannot be used as starting time.
OR 5-01	Set benchmarks. Add disaggregation by UNE-loop, UNE-P, resale, xDSL and other services with standard percentage	

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	increasing over time in light of CLEC priorities for orders that flow through-i.e. standard for UNE-P should be 80% initially, rising to 85% in six months, 90% in a year; 95% in a year and a half.	
OR-8		Delete footnote and proposed two month delay of measurement for CLECs moving to NetLink
OR-10	Replace with Trouble Tickets Cleared in Three Days and Five Days as proposed by CLECs in NY.	
PR 1	Add Special Access and Line Splitting to disaggregation of submetrics.	
PR 2	Add Special Access and Line Splitting to disaggregation of submetrics	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks rather than parity with Feature Group D service.
PR 3		Delete "No Facilities" exclusion.
PR 4	Add Special Access and Line Splitting to disaggregation of submetrics. Add business rule that on-time performance for inbound (VZ-CLEC) trunks is measured against negotiated due date and any extension (VZ supped due date) not requested by CLEC is a miss.	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks rather than parity with Feature Group D service.
PR 4-08	Add to business rules that these Missed Appointments will not be excluded as Customer Not Ready.	
PR-5	Add Special Access and Line Splitting to disaggregation of submetrics	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks rather than parity with Feature Group D service.
PR 5-04	Add metric (% Orders Cancelled by CLEC – No Facilities)	
PR 5-05	New metric added to account for cancelled orders due to "no facilities" after an FOC is received	
PR 6	Add Special Access and Line Splitting to disaggregation of submetrics. Add metric reporting the numbers excluded due to lack of CLEC cooperative testing.	Use standard (95% in 18 days for existing trunk groups, 30 for new trunk groups; establish interval for projects) for trunks rather than parity with Feature Group D service.
PR 6-03		Include repeats during first 30 days of install.
PR 6-04	New metric added to account for "no dial tone on turn up" troubles.	
PR 7	Add disaggregated reporting by UNE-loop, UNE-platform, UNE Specials, DSL, line sharing, line splitting, Special Access and use all missed appointments for product in the denominator. Also report Average	

WorldCom Proposed Additions and Changes
to VZ's VA Metrics Guidelines

Metric	Addition to VA Proposal	Modification of VA Proposal
	notice interval for all or compare to standard stated (but not measured) in business rules: 48 hours for facilities misses and 24 hours for other types of misses VZ now sends electronic jeopardies, which it did not do when this metric was first discussed in NY.	
PR 8	Add Special Access and Line Splitting to disaggregation.	
PR 9-08		Reinstate description. Change standard to 95% in 1 hour.
MR-2		Use largest private line customers and not FGD as retail analog for trunks and Specials.
MR 2-04,05		Change standard to parity as required for PA FOK/TOK/CPE metric.
MR 3	Add NY MR 3-04 and 05 metrics on % Missed Repair Appointment –No Double Dispatch and % Missed Repair Appointments Double Dispatch Add Special Access and Line Splitting disaggregations.	Use largest private line customers and not FGD as retail analog for trunks and Specials.
MR 4		Use largest private line customers and not FGD as retail analog for trunks and Specials
MR 4-02	Add standard for Special Access of 4 hours.	
MR 4-03	Add standard of 1 hour for Special Access	
MR-4-09 and 10	Add NY metrics on % Missed Repair Appointment –No Double Dispatch and % Missed Repair Appointments Double Dispatch	
MR-5		Use largest private line customers and not FGD as retail analog for trunks and Specials
NP-1	Add standard.	
NP-2	Add disaggregation for augments and intervals for different levels of augments; i.e. 30 day, 45 day, 60 day augment classifications.	Change to dissaggregate by each submetric only and apply 95% standard.
BI 1	Add new metric on DUF errors corrected in X Days.	
BI 2	Add new metric on Carrier Bill errors corrected in X days. Include electronic transmission formats.	
BI 3	% Billing Adjustments – Need measure of both total dollars and number of adjustments made.	