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COMMONWEALTH OF VIRGINIA, ex rel.

STATE CORPORATION COMMISSION

CASE NO. PUC000035

Ex Parte: In the matter of third-party testing of Operation Support Systems for Bell Atlantic-Virginia, Inc.

Project Leader Ruling Regarding Metric OR-10

April 27, 2001

On February 17, 2000, the Commission established this proceeding to conduct third-party testing of the operation support systems (“OSS”) for Bell Atlantic-Virginia, Inc., now Verizon-Virginia, Inc. (“Verizon”). Pursuant to the Commission’s directives, on August 11, 2000, the Project Leader adopted a performance standards (“Metrics”).¹

On February 16, 2001, Verizon requested elimination of Metric OR-10 Lost Order Trouble Tickets because of the difficulty in reporting this Metric. According to Verizon:

OR-10 relies on trouble tickets with a lost order status as the source of non-conformance. Unfortunately, this reliance makes the [M]etric both unreliable and highly difficult to compute.²

On March 5, 2001, the Commission’s Project Leader issued a ruling seeking comments from interested persons concerning Verizon’s request to eliminate Metric OR-10. As of March 20, 2001, comments opposing Verizon’s recommendation were received from the Division of Consumer Counsel, Office of the Attorney General (“Attorney General”) and AT&T Communications of Virginia, Inc. (“AT&T”). Also commenting on Verizon’s request was WorldCom, Inc. (“WorldCom”) on behalf of MCI WORLDCOM Communications of Virginia, Inc. and MCI metro Access Transmissions Services of Virginia, Inc. WorldCom proposed a new Metric, designated as Metric PO-9 Timeliness of Trouble Ticket Resolution. If this new Metric is adopted, WorldCom would not oppose the elimination of Metric OR-10.

As described in the Project Leader Ruling Adopting Metrics, OR-10 represents a new Metric proposed by KPMG based on its experience in other jurisdictions.³ This Metric is designed to measure orders Verizon fails to acknowledge, confirm, or reject.⁴ More specifically, OR-10 is calculated as follows:

¹ *Commonwealth of Virginia ex rel. State Corporation Commission, Ex Parte: In the matter of third-party testing of Operation Support Systems for Bell Atlantic-Virginia, Inc., Case No. PUC000035, Project Leader Ruling Adopting Metrics (August 11, 2000) (“Metrics Ruling”).*

² Verizon Petition at 1.

³ *Metrics Ruling* at 21.

⁴ *Id.*

Numerator: Total number of trouble tickets received with a lost order status (no acknowledgement, confirmation, or rejection received by the CLEC) for specified product [*i.e.*, resale, UNE].

Denominator: Sum of 1.) all orders acknowledged, confirmed or rejected by [Verizon] and 2.) trouble tickets received with a lost order status (no acknowledgement, confirmation, or rejection received by the CLEC) for specified product. Duplicates found in both categories are counted once.⁵

Verizon contends that trouble tickets typically include multiple orders that “have a myriad of reasons why they are being reported as a trouble.”⁶ Thus, for an accurate measure of the number of orders that may have been lost, Verizon claims that it would have to perform a manual inspection and count of each trouble ticket.⁷ Such a process, Verizon argues would be “tedious and time consuming.”⁸

In addition, Verizon raises three other objections to OR-10. First, Verizon maintains that OR-10 fails to account for notifiers returned by Verizon, but lost by the CLEC or for notifiers returned late by Verizon.⁹ Second, no other Verizon jurisdiction requires the reporting of OR-10.¹⁰ Finally, Verizon asserts that OR-10 is unnecessary and is duplicative of the information provided by OR-9 Order Acknowledgement Completeness, which requires that 99% of orders be acknowledged the same day as received, and OR-7 Percentage Order Confirmation/Rejects Sent Within 3 Business Days, which requires that 95% of orders be confirmed or rejected within three business days of receipt.¹¹

Both the Attorney General and AT&T make similar arguments for retaining OR-10. Both point out that the arguments Verizon gives for eliminating OR-10 have not changed from those made and rejected by the Project Leader when the Metrics were adopted initially.¹² Moreover, both contend that OR-10 is a unique Metric, not encompassed by OR-7 and OR-9.¹³ Finally, both assert that Verizon has had ample time to comply with OR-10.¹⁴

In its comments, WorldCom describes problems it has experienced in other states concerning EDI status notifiers. EDI status notifiers provide CLECs notice that Verizon has processed the CLEC’s orders, provided the requested facilities, and that Verizon has stopped

⁵ Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports at 48 (August 11, 2000).

⁶ Verizon Petition at 1.

⁷ *Id.*

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² Attorney General Comments at 2-3; AT&T Comments at 1-2.

¹³ Attorney General Comments at 4; AT&T Comments at 4, 6.

¹⁴ Attorney General Comments at 5; AT&T Comments at 2-4.

billing the retail customer.¹⁵ Because it is unclear whether OR-10 will capture information on all missing EDI notifiers, WorldCom proposes adoption of PO-9 Timeliness of Trouble Ticket Resolution.¹⁶ Specifically, WorldCom proposes a Metric calculating the percentage of missing notifier trouble ticket orders cleared within three business days.¹⁷ WorldCom's proposed Metric is derived by dividing the "[n]umber of EDI missing notifier trouble ticket PONS¹⁸ in denominator cleared within 3 business days after receipt" by the "[t]otal number of EDI missing notifier trouble ticket PONS submitted."¹⁹

OR-10 is intended to provide diagnostics or an indication of orders believed to be lost by or within Verizon's OSS. It is diagnostic in nature in that it does not have a specified performance standard. Because OR-10 is diagnostic in nature, partial reliance on CLECs is appropriate. A trouble report with a lost order status is the first indication to Verizon's OSS that it may have lost a CLEC's order. Indeed, reliance on CLEC-provided data is unavoidable when examining instances where Verizon's OSS may be unaware that an order has been lost. In addition, because Verizon may not be aware of the CLEC's order or that it has lost the order, it is unlikely that such an order will be included in either OR-7 or OR-9. However, by being diagnostic in nature, this metric is intended only as an indication of a problem. OR-10 does not assign blame. As Verizon correctly points out, CLECs may have lost notifiers sent by Verizon or the CLEC may prematurely report lost orders. Nonetheless, a high instance of lost orders reported by CLECs focuses attention on the problem and provides an indication of the appropriateness of further inquiry.

Moreover, because OR-10 is diagnostic in nature, concessions were made to its design in order to simplify the process by which Verizon accumulates, calculates, and reports its results. For example, OR-10 should focus on counting trouble tickets rather than orders or reported troubles. This focus is intended to avoid the manual inspection and count of each trouble ticket.

Consequently, to eliminate the need for manual inspection, I find that the numerator of OR-10 should be modified to eliminate the need to identify trouble reports by product type. This should eliminate any need for manual inspection of individual trouble tickets, and avoids problems of classification when a single trouble ticket includes reports of multiple lost orders that include both resale and unbundled network elements. In addition, I find that the denominator of OR-10 should be simplified to include only the total trouble tickets. With these changes the numerator and denominator for OR-10 should be changed to the following:

Numerator: Total number of trouble tickets received that have reported any LSRs where no acknowledgement, confirmation, or rejection was received by the CLEC.

¹⁵ WorldCom Comments at 1-2.

¹⁶ *Id.* at 3-4.

¹⁷ *Id.* at 4.

¹⁸ "PON" or "Purchase Order Number" is defined as "Unique purchase order number provided by CLEC to [Verizon] placed on Local Service Request ("LSR") or Access Service Request ("ASR") as an identifier of a unique order." Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports at 117.

¹⁹ WorldCom Comments at 3.

Denominator: Total number of trouble tickets received from the CLEC.²⁰

With these changes OR-10 should provide an indication of whether lost orders represent a significant problem warranting further investigation. Also, it should provide guidance to the ongoing collaborative examining Metrics concerning WorldCom's proposed new Metric. For example, if OR-10 indicates that lost orders represent a significant problem (*i.e.*, most trouble tickets filed by CLECs contain complaints of lost orders), then a more detailed measure, such as WorldCom's proposed PO-9, should be considered by the collaborative.

In summary, based upon Verizon's Petition and all of the comments, I find that OR-10, as modified, should remain a part of the Virginia Metrics.

Alexander F. Skirpan, Jr.
Hearing Examiner/Project Leader

Document Control Center is requested to mail or deliver a copy of this Ruling on April 27, 2001, to each of the following:

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²⁰ A revised OR-10 Lost Order Trouble Tickets is attached to this Ruling.

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Function:		
OR-10 Lost Order Trouble Tickets		
Definition:		
<i>Lost Order Trouble Tickets:</i> CLEC trouble tickets received by BA that indicate that an order submitted by the CLEC has never been acknowledged, confirmed, or rejected (missing EDI notifiers). Time period measured is based on the CLEC stated submission date.		
Exclusions:		
<u>Resale & UNE:</u>		
<ul style="list-style-type: none"> • BA Test Orders²¹ 		
Performance Standard:		
Metric OR-10-01: No standard.		
Report Dimensions:		
Company: <ul style="list-style-type: none"> • CLEC Aggregate • CLEC Specific • BA Affiliate Aggregate • BA Affiliate Specific 	Geography: <ul style="list-style-type: none"> • State 	
Sub-Metrics		
OR-10-01	% Lost Order Trouble Tickets	
Products	No product specificity–Total ticket counts	
Calculation	Numerator	Denominator
	Total number of trouble tickets received that have reported any LSRs where no acknowledgement, confirmation, or rejection was received by the CLEC.	Total number of trouble tickets received from the CLEC.

²¹ BA Test Orders – see Glossary.