Poor Performance on Important SQMs That Will Result in No Penalty Payments Under the Bell Atlantic Plan

To determine how many submeasures could be missed without a penalty being levied, we follow a three step process:

- (1) Find the sum of the weights for the given MOE.
- (2) Multiply the sum of the weights by the minimum –X value for that MOE to get the total weighted performance score that will make a penalty marginal.
- (3) Back out the number of submeasures of a given weight (e.g., 20) that could fail badly (e.g., have a performance score of –2) before a penalty is due (i.e., before Min –X is exceeded)

The table below gives the appropriate values:

MOE	Sum of Wts	Min -X	Marginal Score
Resale	494	191	-94.4
UNE	609	190	-115.7
Trunks	180	301	-54.2

The important information in the table is in the third column, Marginal Score. For a given MOE, any combination of misses with a total weighted score less (in absolute value) than the corresponding entry in the third column would not draw a MOE penalty¹ Some examples are given below.

I. RESALE:

Example 1: miss 2 submeasures, each weighted 20, with performance scores of -2 + miss one submeasure, weighted 5, with a performance score of -2

To illustrate:

Missed Submeasure Wt. Score Wt x Score % missed repair 20 -2 -40 appts – loop % on time LSRC 20 -2 -40 flow thru – POTS 5 % missed repair -2 -10 appts – central office TOTAL -90

Since -90 is less than -94.4 in absolute value, no MOE penalty would be due in this case. Put another way, -90/494 = -.182 which is greater than -.191 (MIN -X), so no MOE penalty is due. Indeed, since none of these are critical measures, no penalty at all is due.

¹ The examples below could be consecutive failures for two or more months and not garner a remedy if they are the only metrics failing in Mode of Entry scoring. Under the BA plans the −2 scores could represent both minor and severe misses. In fact, performance failures with a higher confidence level of disparity than 95% could drop out of the plan.

Example 2: miss three submeasures, each weighted 15, with performance scores of -2

To illustrate:

Missed Submeasure	Wt.	Score	Wt x Score
% OT LSR reject	15	-2	-30
<10 lines (elec. No			
flow thru) – POTS			
% OT LSR reject	15	-2	-30
<10 lines (elec. No			
flow thru) – Special			
% installation	15	-2	-30
trouble within 30			
days - POTS			
TOTAL			-90

Again, an aggregate performance score of –90 would elicit no MOE penalty since it is less in absolute value than –94.4, and again, no penalty of any sort would be in order since these measures are not on critical measures list.

Many other combinations are possible. For example, BA could miss four submeasures, each weighted 10, and one submeasure weighted 5, all with –2 performance scores for an aggregate MOE score of 90.

II. UNEs:

Example 1: miss two submeasures, each weighted 20, and one submeasure weighted 15, all with performance scores of -2.

To illustrate:

Missed Submeasure	Wt.	Score	Wt x Score
% missed	20	-2	-40
appointments- BA			
no dispatch-			
platforms			
% OSS Interface	20	-2	-40
AvailabilityPrime			
Customer Service	15	-2	-30
Record Response			
TOTAL			-110

Since -110 is less than -115.7 in absolute value (or alternatively, since -110/609 = .181 is greater than min -x = -.19) no MOE penalty is due. However, in this case, all three measures are critical measures, so some penalty will be paid. How much a particular CLEC might receive depends on the number of CLECs in the market and whether the maximum remedies are triggered.

Example 2: Five missed submeasures, each weighted 10 and one missed submeasure weighted 5, all with performance scores of –2

To illustrate:

Missed Submeasure	Wt.	Score	Wt x Score
% completed w/in 5	5	-2	-10
days(1-5 lines, no			
dispatch)- UNE-			
P/other			
% completed w/in 5	10	-2	-20
days(1-5 lines,			
dispatch)- UNE-			
P/other			
Average delay days	10	-2	-20
– total - POTS			
Average delay days	10	-2	-20
– total - Special			
Average delay days	10	-2	-20
total - Complex			
% missed	10	-2	-20
appointments -			
POTS			
TOTAL			-110

Here again, no penalty would be due. Since -110 is less than -115.7 in absolute value, no MOE penalty is due. None of these are critical measures so no critical measures penalty is due. Finally, even though all come from the UNE Provisioning domain, there is no domain clustering penalty due under the current proposal.

Of course, many other combinations are available.

III. TRUNKS:

Example: One submeasure weighted 15 and one submeasure weighted 10, both having a performance score of -2

To illustrate:

Missed Submeasure	Wt.	Score	Wt x Score
% on time order	15	-2	-30
confirmation			
Average delay days	10	-2	-20
– total			
TOTAL			-50

Since -50 is less than -54 in absolute value (or since -50/180 = -.278 > -.301 = min - x), no MOE penalty is due. Also no critical measures penalty is due since neither of these are critical measures.

IV: COLLOCATIONs: These submeasures are not affected since their min –X is zero. Problems with Collos come from elsewhere, e.g., unreasonably low overall caps.