

**Attachment to RR-225**

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From: 'Peggy Rubino' [<mailto:MDR@dps.state.ny.us>]

Sent: Tuesday, October 12, 1999 4:29 PM

To: 'Bob Mulveen'; 'Randy Milch'

Subject: mulveen-Milch/ltr/10-12

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RE: Case 97-C-0271 - July and August Loop  
Hot Cut Reconciliation

Dear Messrs. Mulveen and Milch:

Staff is currently reviewing certain loop hot cut purchase orders to determine whether any adjustment is warranted to Bell Atlantic-NY's reported July results pursuant to the Commission's % On Time Performance - Hot Cut carrier to carrier measure (PR-4-06). A similar review is anticipated for August results. Staff's review is focused on those purchase orders that AT&T claims were not properly scored under the carrier-to-carrier measure. To facilitate staff's review, and to respond, at least to the extent practical, to Mr. Mulvee's September 29, 199 letter to Mr. Milch regarding potential scoring disagreements under PR-4-06, staff will set forth the rules that will be use to perform the review. While the parties are expected to use the rules set forth here, it must be understood that they may be changed based on recommendations that will be made to the Commission in the Carrier-to-Carrier proceeding by Administrative Law Judge Jaclyn Brillling .

PR-4-06 measures the percent of loop hot cut orders "completed" within the cut-over window, which varies from 1 hour (1-9 Lines) to 8 hours (200 plus lines). Because hot cuts involve considerable coordination between a CLEC and Bell Atlantic-NY, it is difficult to anticipate every possible provisioning problem and the appropriate metric scoring. Staff's scoring is based on the following rules:

- The start of the cut-over window is determined by the Local Service Request (LSR) due date, unless the LSRC (confirmation) is later and the CLEC fails to escalate the difference with Bell Atlantic-NY.
- An order is "completed" when Bell Atlantic-NY performs the hot cut and notifies the CLEC by telephone or other appropriate means (including leaving a message if there is no answer after a reasonable attempt to escalate), provided the CLEC accepts the order or fails to report a trouble within one hour of notification. If the CLEC reports a valid trouble within one hour of notification an order is considered missed. If a CLEC requests additional time to test, the window will be that agreed upon between the parties.
- The cut-over window for lines served by IDLC is not specified in the carrier-to-carrier guidelines.  
Because these lines require a field dispatch to convert the line to alternate facilities and a second dispatch to perform the hot cut, a one hour window is too short. Consistent with Bell Atlantic-NY's retail appointment windows for dispatch orders, staff is using an AM or PM appointment window; in effect a four hour window.
- The carrier-to-carrier guidelines do not now define as

a miss a failure by Bell Atlantic-NY to confirm the absence of CLEC dialtone at due date minus 2 days. Application of the due date minus 2 days check has not been rigorously adhered to at the operations level and it appears that technicians have been using different practices to effectuate coordination. On September 24, 1999, Bell Atlantic-NY committed to scoring such failures as misses under the Performance Assurance Plan. Staff will not apply that scoring commitment retroactively to the July and August reported results.

Consistent with Bell Atlantic-NY's commitment to formally track adherence to the due date minus 2 days check, Bell Atlantic-NY will be allowed a four hour window on IDLC orders only on orders for which it has notified the CLEC that the order involves IDLC facilities by at least 2:30 pm on due date minus two days. Again, staff will not apply this rule retroactively to the July and August reported results.

- If Bell Atlantic-NY cannot complete an order on the due date because of its inability to timely identify and address existing IDLC facilities (assuming alternate facilities are available) the order will be considered missed.

- An order that is shipped to a later date because of an inaccurate confirmation will not be considered missed, but instead will be captured in the LSRC accuracy metric. Consistent with Bell Atlantic-NY's due date minus 2 days commitment, however, issues that arise because of an inaccurate LSRC should be identified at due date minus 2 days.

If Bell Atlantic-NY or AT&T wishes to identify any orders for August that they would score differently based on the above rules, they should notify me as soon as possible.

Sincerely,

Peter McGowan  
Managing Attorney