



Telecom Decision CRTC 2008-28

Ottawa, 31 March 2008

CISC Business Process Working Group – Non-consensus report BPRE064d regarding the use of line activity code types for competitor quality of service indicators

Reference: 8621-C12-01/00

In this Decision, the Commission approves one consensus item and resolves one non-consensus issue submitted by the CRTC Interconnection Steering Committee (CISC) Business Process Working Group related to how incumbent local exchange carriers (ILECs) calculate competitor quality of service results when supplying services and facilities to their competitors.

The Commission directs the ILECs to implement its determinations on these matters within 90 days of the date of this Decision.

Introduction

1. In Telecom Decision 2006-59, the Commission requested that the CRTC Interconnection Steering Committee (CISC) review the measurement methods and any potentially problematic circumstances related to calculating competitor quality of service (Q of S) results.
2. In response, the CISC Business Process Working Group (BPWG) filed non-consensus report BPRE064d, dated 25 January 2008. In that report, the BPWG presented parties' views and made recommendations about what line activity (LNA) code types and order and repair activities should be taken into consideration when calculating incumbent local exchange carriers' (ILECs) Q of S performance.
3. The BPWG noted that parties had reached consensus on the use of common LNA code types for the following six indicators:
 - Indicator 1.8 – New Unbundled Type A and B Loop Order Service Intervals Met;
 - Indicator 1.9 – Migrated Unbundled Type A and B Loop Order Service Intervals Met;
 - Indicator 1.10 – Local Number Portability (LNP) Order (Standalone) Service Interval Met;
 - Indicator 2.7 – Competitor Out-of-Service Trouble Reports Cleared within 24 Hours;
 - Indicator 2.9 – Competitor Degraded Trouble Reports Cleared Within 48 Hours; and
 - Indicator 2.10 – Mean Time to Repair (MTTR) – CDN Services and Type C Loops.

4. The BPWG also noted that parties had been unable to agree about whether disconnect activity should be included in the following indicators:
 - Indicator 1.11 – Competitor Interconnection Trunk Order Service Interval Met;
 - Indicator 1.12 – Local Service Request Confirmed Due Dates Met; and
 - Indicator 1.19 – Requested Due Dates Met – CDN Services and Type C Loops.
5. Non-consensus report BPRE064d is available on the Commission's website at www.crtc.gc.ca.
6. The Commission considers that the report raises the following issue: Should ILECs include or exclude disconnect orders in the performance calculation of competitor Q of S indicators 1.11, 1.12, and 1.19?

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7. The local exchange carriers that supported including disconnect activity in competitor Q of S indicators 1.11, 1.12, and 1.19 submitted that disconnects now follow a process similar to that of provisioning an unbundled loop, which includes a formal provisioning order activity to remove the connecting link within the same timeframe as the termination of billing. They submitted that, accordingly, such disconnects should be included in the competitor Q of S indicators to reflect the provisioning activity for those ILECs that have opted to release the connecting link for reuse by the competitor local exchange carrier (CLEC) within a defined service interval.
8. These carriers added that such disconnect activities do not, and should not, exclude work performed by the ILEC to complete the disconnection of a facility as requested by a CLEC.
9. Some parties proposed that the Commission consider an approach by which those ILECs that continue to follow the existing business rules would not include disconnects in competitor Q of S indicators 1.11, 1.12, and 1.19.
10. Rogers Cable Communications Inc. (RCCI) and MTS Allstream Inc. (MTS Allstream) submitted that they do not support the concept of different measurement methods for different carriers.
11. Some parties disagreed with including disconnects in these indicators because there is no standard service interval for the ILEC to meet for the physical disconnection of the service. They submitted that the current definition of competitor Q of S indicator 1.11 states that the service interval is for the turn-up of local network interconnection (LNI) trunks; indicator 1.12 refers to provisioning local service requests (LSRs); and indicator 1.19 refers to provisioning Type C loops or competitor digital network (CDN) service. They added that there was no reference to the de-provisioning of service (disconnects) for these indicators, and if disconnects were to be included in these indicators, then their definitions should be amended.

Commission's analysis and determinations

12. The Commission will first address competitor Q of S indicator 1.12, which deals with provisioning for LSRs. It will then look at indicators 1.11 and 1.19, which deal with LNI trunks and CDN services. Finally, the Commission will consider trailing indicators 1.13, 1.11A, and 1.19A.

Q of S indicator 1.12

13. The Commission notes that competitor Q of S indicator 1.12 is defined as the percentage of instances that the agreed-upon and confirmed due date is met for provisioning LSRs other than LSRs for new/migrated loops and for standalone local number portability (LNP) orders measured by competitor Q of S indicators 1.8, 1.9, and 1.10. The due date means the agreed-upon and confirmed due date that differs from the standard due date measured under indicators 1.8, 1.9, and 1.10.
14. The Commission also notes that the definition of competitor Q of S indicator 1.12 includes all LSRs; that is, LSRs for disconnecting as well as for provisioning unbundled loops, including Type C loops.¹
15. The Commission further notes that, as submitted in the CISC report, the Canadian Local Ordering Guidelines indicate that the standard service interval of two business days for disconnecting Type A and Type B loops is associated with terminating billing for these unbundled loop types. In addition, the connecting link must be removed within 30 calendar days following the due date. Typically, this activity is completed by the ILEC in conjunction with other work on the central office loop termination² within the 30-day period following the disconnection due date of the unbundled loop.
16. Accordingly, the Commission determines that ILECs are to include in their competitor Q of S indicator 1.12 performance calculation LSRs for disconnection of all types of unbundled loops.

Q of S indicators 1.11 and 1.19

17. The Commission notes that for competitor Q of S indicators 1.11 and 1.19, the performance measurement refers to turning up LNI trunks and provisioning CDN services for which service intervals have been approved. The Commission also notes that in the case of LNI trunks and CDN services, competitors order disconnection activities by issuing an abbreviated access service request or a service order. The Commission further notes that no service intervals have been approved for this type of disconnection activity.
18. Accordingly, the Commission determines that ILECs should not include disconnection activities related to LNI trunks and CDN services in the performance measurement of competitor Q of S indicators 1.11 and 1.19.

¹ The activity of disconnecting unbundled loops is associated with LNA code "L" in the Canadian Local Ordering Guidelines.

² Central office loop termination refers to the end point of the ILEC-provided transmission path that terminates at the ILEC's distribution frame or other designated distribution device in the ILEC's central office building. This path includes the connecting link.

*Trailing competitor Q of S indicators 1.13, 1.11A, and 1.19A*³

19. The Commission notes that competitor Q of S indicators 1.12, 1.11, and 1.19 have trailing indicators⁴ that measure late delivery at prescribed service intervals for unbundled loops, LNI trunks, and CDN services.
20. The Commission considers that the determinations above related to the performance calculation for the main competitor Q of S indicators 1.12, 1.11, and 1.19 also apply to the performance calculation of their trailing indicators, which are, respectively, indicators 1.13, 1.11A, and 1.19A.

Conclusion

21. The Commission has reviewed, and **approves**, the consensus item submitted by the CISC BPWG in its report. Regarding the non-consensus issue, the Commission directs the ILECs to implement the above determinations within 90 days from the date of this Decision.

Secretary General

Related documents

- *Part VII application to review and vary Decisions 2003-72 and 2005-20*, Telecom Decision CRTC 2006-59, 21 September 2006
- *Finalization of quality of service rate rebate plan for competitors*, Telecom Decision CRTC 2005-20, 31 March 2005

³ Indicator 1.13 – Unbundled Type A and B Loop Order Late Completions
Indicator 1.11A – Interconnection Trunk Order Late Completions
Indicator 1.19A – CDN Services – Late Completion

⁴ See Telecom Decision 2005-20, paragraph 157, for a description of trailing indicators.

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