

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Application of Southwestern Bell Telephone)	
Company to Provide Notice of Intent to File an)	
Application for Authorization to Provide In-Region)	Case No. TO-99-227
InterLATA Services Originating in Missouri)	
Pursuant to Section 271 of the Telecommunications)	
Act of 1996.)	

**SBC MISSOURI’S RESPONSE TO STAFF’S UPDATE IN COMPLIANCE WITH THE
ORDER DIRECTING FILING REGARDING PERFORMANCE MEASUREMENTS**

Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (“SBC Missouri”) offers this brief response to one aspect of the Commission Staff’s February 5, 2004 Update filed in compliance with the Commission’s January 16, 2004 “Order Directing Filing” (“Order”). Staff’s “PM 2-12” discussion vividly illustrates why the Commission should adopt Version 3.0 of SBC Missouri’s performance measurements as soon as practicable.

Staff’s update noted that most of the Tier-2 assessments SBC Missouri has paid are attributable to its inability to meet the performance standard for a single pre-ordering measure, PM 2-12 (Percent Responses Received Within “X” Seconds – OSS Interfaces (Request for Telephone Number (Verigate))). Staff noted that had the Commission approved SBC Missouri’s May 16, 2003 motion (which urged the Commission’s adoption of SBC Missouri’s Version 3.0 performance measurements), it is likely that with the new PM 2-12 benchmark, total Tier-2 assessments would have been significantly lower. Staff’s February 5, 2004 Update, pp. 3-4.

Staff’s discussion of PM 2-12 offers a perfect example of why the Commission should adopt Version 3.0 of SBC Missouri’s performance measurements. Under current Version 1.7, the performance standard for PM 2-12 is a benchmark of 80% in at least 4 seconds, and 90% within at least 6 seconds. However, under Version 3.0, already approved by the commissions in Arkansas, Kansas and Texas, the benchmark for PM 2-12 is 95% within at least 10 seconds. The


changed benchmark resulted from CLECs' recognition during the fall, 2002 Six-Month PM Review in Austin, Texas, that based upon certain functionalities added to the Telephone Number pre-ordering inquiry negotiated with the CLECs,¹ an adjustment to the performance benchmark was appropriate. Consequently, the Version 3.0 benchmark for PM 2-12 reflects a more reasonable and rational performance target that is based on real world considerations. And, under that standard, SBC Missouri performed at a level of over 95% in nine of the twelve months of 2003, and over 94% in each of the other three months. On the other hand, the Version 1.7 benchmark for PM 2-12 is irrational, sadly out of date and reflects no current real world considerations.

Under these circumstances, it is both unreasonable and unfair that SBC Missouri has continued to incur significant Tier-2 assessments due to its not having met the Version 1.7 PM 2-12 benchmark. To the extent that Staff's comment was meant to say as much, SBC Missouri appreciates the Staff's support. In any case, for the additional reasons noted herein, SBC Missouri again urges the Commission to adopt version 3.0 of SBC Missouri's performance measurements.

¹ These functionalities include accessing databases and other reference sources that were not available in prior versions, providing TN Pooling Status and supporting true TN reservation. They were developed as a result of Plan of Record OSS upgrades to which SBC committed to the FCC when the FCC approved SBC's merger with Ameritech.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the Service List by electronic mail and/or U.S. mail on 16th day of February 2004.


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