



Office of the Director of
**Telecommunications
Regulation**

Measuring Licensed Operator Performance

Consultation Paper

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1 Introduction

The Director of Telecommunications Regulation (“the Director”) is responsible for the regulation of the Irish telecommunications sector in accordance with national and EU legislation.

EU legislation requires the Director to collect performance information from specified operators in relation to a set of basic Licensed Services. The General Telecommunications Licences¹ (“General Licence”) issued by the Director since 1st December 1998 include provisions which enable the introduction of a performance measurement programme for General Licensees. This provides for a wider range of services that can be monitored and the types of Licensees which are covered by any programme.

The availability of impartial and comparable information on the performance of Licensed Operators will enable consumers to make informed purchasing decisions. An operator can make numerous promises about the quality of services that it provides, but in many cases it is hard for the consumer to judge whether, in reality, the operator can keep these promises. Measuring an operator’s ability to keep its promises to customers, and subsequent publication of comparable results from a wide spectrum of operators, will increase the level of transparency in the Irish telecommunications market and thereby allow consumers to make informed decisions in choosing or remaining with an operator.

In addition to measuring performance on services to the public, the Director is proposing to monitor the performance of Telecom Éireann in the delivery of Carrier Services to Other Licensed Operators (OLOs). The Director has launched a consultation on service level agreements provided by the SMP operator to Other Licensed Operators (ODTR 99/29). That paper highlighted the importance of service levels provided by SMP operators to their competitors, particularly where the services provided are an essential input into the competitor’s own services to customers. For the same reasons, monitoring and reporting on the SMP operators performance in relation to their service levels are important. This will be a particularly important tool in ensuring that there is no actual or perceived discrimination by an operator in providing services on the one hand to its competitors and on the other hand to its own retail customers.

This consultation paper sets out an approach that is designed to ensure that the Director has sufficient information to monitor the performance of General Licensees, provide the required feedback to the EU and also to publish information in the public interest. In this respect the Director will use the results of this consultation to determine what information is to be made available to the public, enhancing their knowledge of the market and thus stimulating competition.

The Director now welcomes comments from interested parties in relation to any of the questions raised in Sections 3 to 8. The closing date for receipt of comments is **31st August 1999**. Please see Section 9 for details on submitting comments on this paper.

¹ Licences issued under section 111(2) of the Postal and Telecommunications Act, 1983.

2 Background

2.1 About this Consultation

Both EU and Irish legislation recognise that, in the interests of developing and sustaining competition the Office of the Director of Telecommunications Regulation (“the ODTR”), the European Commission and the public should have access to appropriate information on the performance of Licensed Operators active in the market for certain defined services:

- direct access telephony
- indirect access telephony
- leased lines
- directory enquiry services
- operator assistance services
- public payphones.

Prior to this and related consultations the ODTR solicited the views of all existing License holders regarding:

- their current service offerings and any Service Level Agreements which attach performance targets to those offerings.
- performance measures that should be examined by the ODTR, prior to publication of this consultative paper.

In addition, the ODTR has consulted with National Regulatory Authorities in other European Union Member States to ascertain the “best practice” in this area. The obligations at EU level relate in the main to 1998 Directives. As yet, only the UK has an advanced system in place for the collection and publication of performance data.

The results of these two exercises, and the requirements of the relevant legislation, have been taken into consideration in developing the proposals described in this consultation paper.

2.2 Legislation

The most relevant legislative provisions are:

- *Council Directive 98/10/EC on the application of Open Network Provision (ONP) to voice telephony and on universal service for telecommunications in a competitive environment*
- *The European Communities (Voice Telephony and Universal Service) Regulations, 1999, SI No. 71 of 1999, transposing the above directive.*

- *Council Directives 98/80/EC and 97/51/EC which amend the previous Directive 92/44/EEC on the application of ONP to leased lines*
- *European Communities (Leased Lines) Regulations, 1998, SI No. 109 of 1998, transposing the above directive.*

The Directives and Regulations place obligations on providers of the relevant telecommunications services.

For voice telephony services, these obligations² include provision of information from any General Licensee on metrics defined in Annex III of the Council Directive 98/10/EC, namely:

- supply time to initial connection
- fault rate per access line
- unsuccessful call ratio
- call set up time
- response times for operator services
- response times for directory enquiry services
- proportion of coin and card operated public pay-telephones in working order
- billing accuracy.

In accordance with Regulation 16 of SI 71 of 1999, operators who are designated as having significant market power (SMP), or who are designated as a universal service provider, must establish and maintain records concerning their performance based on the above metrics. This information has to be provided to the Director on request. Currently, Telecom Éireann is the only operator who has been designated as having SMP in the fixed market³ and is also the only operator who has been designated as a universal service provider⁴. The requirement on other General Licensees to keep such records will apply 18 months from the date of issue of a General Licence i.e. 1 June 2000 at the earliest. The Director may, where appropriate and after consultation with interested parties, issue directions requiring the publication of this performance data.

For providers of leased lines, only those notified under Regulation 4 of SI No. 109 of 1998 are obliged to provide information to the Director. Telecom Eireann (TÉ) is currently the only operator notified under this regulation. TÉ is obliged to provide the Director with information on:

- its performance in delivering and repairing leased lines

² Regulation 16 of the European Communities (Voice Telephony and Universal Service) Regulations, 1999, (SI No. 71 of 1999).

³ “Significant Market Power in the Irish Telecommunications Sector – Decision Notice D4/98” ODTR Document 98/47

⁴ “Designation of Universal Service Provider – Decision Notice D3/99” ODTR Document 99/31

- cases where access to or use of leased lines have been restricted.

2.3 License Conditions

The relevant Directives and Regulations are reflected in the applicable Licence conditions placed on General Licensees:

- “11.1 The Licensee shall comply with any directions issued by the Director from time to time regarding quality of service indicators and measurement methods for basic telephony services and/or digital leased lines. In issuing directions, the Director shall have due regard to any applicable European (ETR) Regulations. The Director may also, following a public consultation, issue directions regarding quality of service indicators and measurement methods for other Licensed Services, again having due regard to any applicable European (ETR) Regulations.
- 11.2 The Licensee shall, as and when required, supply to the Director, in a form specified by her, the results of its own measurements of actual performance against any quality of service requirements specified by the Director in respect of the Licensed Services from time to time. The Director may include the figures supplied to her in any compilation of the quality of service indicators of licensed operators in the State and/or in the European Community, and may publish the compilation. “

There are additional Conditions applicable to Licensees with Significant Market Power (SMP):

- “17.1 The Licensee shall comply with its obligations under the European Communities (Leased Lines) Regulations, 1998, and undertakes to participate in good faith in any negotiations or dispute resolution process initiated pursuant to those regulations.”

Telecom Eireann is currently the only Licensee designated as having SMP.

2.4 Scope of this consultation

After considering the various inputs described in Section 2.1, the scope of this consultation was determined to be:

- the principles for a performance measurement programme
- how these parameters should be measured
- which parameters are appropriate for measurement
- suitable definitions of the parameters
- the applicability of a performance measurement programme across the range of Licensees currently present in the market
- identifying parameters which are suitable for publication

- the mechanics of measurement, collection, validation, audit and publication.

2.5 Related Consultations

This consultation paper is one of a series of linked papers that the ODTR is issuing during the first half of 1999. The issues raised in these papers are closely related and the outcome of each consultation will impact on others. However, the ODTR believes that the modular approach to these consultations provides the most flexible and fastest method of progressing key issues in the market. Interested parties are referred to:

Service Levels Provided to Other Licensed Operators by Licensees with Significant Market Power: Consultation paper 99/27 issued on 28th April 1999; Responses due by 11th June 1999; Report in July 1999.

This paper proposes the minimum service levels that should be provided by the SMP operator to Other Licensed Operators (OLOs). As such it contains a significant amount of information on the level of performance expected from the SMP operator. The performance measures proposed by the Director will include reference to the minimum service levels provided to OLOs.

3 Principles

The Director has reviewed practices in other Member States of the European Union in order to ascertain the current position regarding the measurement and publication of performance data within the EU. However, with the exception of the UK, there appears to be no advanced procedures in place in Member States. The Director has therefore considered the procedures in the UK and the initial submissions of the General Licensees in developing the principles outlined in section 3.1.

3.1 Principles to govern the gathering and publication of performance measurements

The Director proposes that a number of principles should govern any programme for the gathering of performance measurements. Specifically that the:

- Requirement to make, record or collect measurements should seek to minimise the burden on operators, and the effort involved should be proportionate to the value of the measurements obtained, having regard to the regulatory needs of the Director in respect of licence enforcement and the service of the public interest by the provision of public information.
- The definition of any quantitative parameters should be sufficiently exact so as to ensure comparability, but otherwise allow operators flexibility to use any existing systems and procedures for measurement.
- Additional information may be required of Telecom Éireann as USO and SMP operator in respect of its specific obligations, and in particular, information on the service provided to OLOs should be separately identified from that provided to retail customers. Any other operators with specific obligations may be required to provide additional information in the public interest relating to these obligations.
- Measures which are published should seek to enable the public to make comparisons between companies in respect of the indicators covered, and to identify whether operators and retail customers receive comparable service.
- Measures to be published will focus on an operator's effectiveness in keeping its promises to customers, rather than comprise empirical data on actual performance which on its own may be misleading. The promises against which an operator is measured will be the terms and conditions offered by that operator and will be published along with the performance statistics.
- ODTR should receive empirical data from operators for its own purposes or for use in agreed calculations, which are defined later in this paper
- Operators will have the opportunity to review and propose reasoned corrections to results prior to publication

Item 3.1	Do you agree that these are the appropriate principles? Are there any you would add or delete? Please give reasons for your answer.
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4 Measuring Licensee Performance

4.1 Quantitative Measurements

The Director believes that any performance data collected from a Licensee should:

- provide the Director with sufficient empirical information to enable the calculation of the performance measures decided on as a result of this consultation
- enable comparisons to be drawn between operators, primarily in their ability to keep their promises to customers.

The Director has a responsibility to ensure that Licensees provide an adequate level of service to consumers. To this end, the Director is proposing a set of parameters for measurement that will build on those already mandated by legislation, thus supplying sufficient information to the Director to effectively ensure the Licensees are in compliance with that legislation and are providing an adequate service to their customers.

The Director considers that operators who fail to provide adequate quality of service to customers will eventually be regulated by the actions of the competitive market itself. However, in the meantime the Director believes that the availability of performance data will better inform the Director on the ability of operators to meet their obligations under the terms of their licence, and will also provide valuable information to consumers on the performance of the individual operators and enable consumers to be better informed when choosing operators.

Additionally, the Director wishes to monitor the performance of the Telecom Éireann because of:

- its potential, as an operator with SMP, to affect the competitiveness of OLOs ,
- its current obligations as a designated universal service provider in relation to connections to the fixed public telecommunications network and access to telecommunications services, directory services and public payphones.

Item 4.1.	Is this the appropriate basis for a quantitative performance measurement programme? Are there are alternative issues that should be considered? Please give reasons.
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4.2 Qualitative Measurements

In the longer term, the Director believes there may be merit in supplementing the quantitative data with qualitative feedback from consumers.

The quantitative measures discussed in this document represent the actuality of an operator's performance. The level of performance that is perceived by customers may vary from the actuality. For example:

- There may be a lower perception of performance amongst customers, when the quantitative measures suggest that an operator is performing well. This may be caused by, amongst other things:
 - adverse publicity
 - the public’s perception of the operator’s position in the market
- there may be a higher perception of performance amongst customers, when the quantitative measures suggest that an operator is having problems with its quality of service. This may be caused by, amongst other things:
 - the public’s perception of the importance of a particular performance parameter
 - a strong relationship or association with the operator that off-sets otherwise poor quantitative results.

A market research programme amongst customers of Licensed Operators is one method of determining the qualitative perceptions of the quality of service provided.

Given the early stage of market development the Director believes that it would be inappropriate at this stage to develop a qualitative performance measurement programme but it is her intention to review the need for such a programme when she considers the market may be mature enough to justify its implementation. The Director feels that such market research initiatives now would place an unnecessary burden on new operators in the market. However, the Director considers that new operators should utilise market research techniques to enhance their own understanding of their customer’s requirements and concerns.

Item 4.2.	Do you agree that a qualitative performance measurement programme is not appropriate for the market in its current state of development? If you do not agree, please state your reasons.
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5 Categories of Licensees

5.1 Types of Operator

The Director understands the concerns raised by Licensees that the reporting requirements on them should not be burdensome, such that major additional work is not required to collect data for the ODTR over and above that already collected for the operator's own purposes. To this end the Director has examined the Licence submissions of the Licensees and also requested their initial input prior to this consultation.

In light of the submissions of Licensed Operators, and after reviewing the OFTEL system, the Director proposes to create three categories of General Licensee for the purposes of performance parameter reporting which she considers to be appropriate in the context of the Irish telecommunications sector. These categories are:

- *Category 'A' Licensees* : Licensees who fall below the thresholds in Table 1 (overleaf) will be required to provide data on only those parameters that are deemed mandatory for all Licensees
- *Category 'B' Licensees* : Licensees who are above the thresholds in Table 1 will be required to provide data on the mandatory parameters plus a number of supplemental metrics
- *Category 'S' Licensees*: those operators which have been determined to have SMP within the relevant market will be required to provide data on the same parameters as Category 'B' Licensees plus additional metrics pertinent to the SMP operator's position.

Item 5.1.	Do you agree with the proposed segmentation of Licensees in order to place the appropriate burden of reporting on different categories of operator? If not, please suggest alternatives.
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5.2 Mandatory Reporting

The Director proposes that Category 'A', 'B' and 'S' Licensees will report on a proposed set of mandatory parameters. These cover details of customer complaints. These parameters are based on Condition 6.9 of the General Licence on the implementation of "an appropriate code of practice for the resolution of customer disputes and in relation to non-payment of bills and disconnection". This in turn reflects SI 71 of 1999, Regulation 28 paragraph 2(e) which requires Licensees to keep adequate records of such instances.

It is proposed to apply these requirements to all Licensees in the interests of consumer protection. It is also intended to collect parameters on disconnection of residential customers. However, as this is an area in which no preparation has yet been done – see Table 2 - it will not be included in publications.

Item 5.2.	Do you agree with the Director's proposal to collect information on complaints and residential disconnections from all Licensed Operators? If not, please state your reasons.
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5.3 Categorisation Criteria

The Director is mindful that a number of attributes can affect the applicability of certain parameters to an operator, specifically:

- *target market* : a company may only target a very specific market or geographical area, and therefore not be directly comparable with all other operators
- *company size* : new operators will have constraints placed on them by virtue of their size and as such may not have sufficient resources to conduct extensive quantitative data gathering
- *time since service launch* : the results of any surveys in the early months of a service will not provide accurate measures of performance because the service may only be operative amongst a small number of customers

The Director has taken these attributes into account when drawing up the thresholds for each category of Licensee. These thresholds are shown in Table 1.

Table 1 : Thresholds for Category 'B' Licensees

Service Offered	Threshold for Reporting
Direct access telephony	2,500 lines ⁵
Indirect access telephony	£1m revenue from indirect access services
National leased lines	500 digital leased lines

Item 5.3.A	Are there any other attributes that the Director should consider before setting the threshold for categorising Licensees? If so, what are they?
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Item 5.3.B	Do you agree with the thresholds put forward by the Director? If not, what alternative thresholds would you propose and why?
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As stated already, operators other than the SMP Operator or the universal service provider (i.e. in both cases Telecom Éireann) are not required to provide performance measurement

⁵ See Appendix II for definition.

information to the Director for the first 18 months after they receive their Licence. However, the Director hopes that new operators would see the benefit of supplying such data voluntarily, both to themselves and the public. Such voluntary reporting need only take place after the thresholds in Table 1 have been met. The first General Licences which would qualify for Category 'B' status were issued on 1st December 1998. Consequently the thresholds would not come into force until 1st June 2000.

Item 5.3.C	Does your company currently qualify as a Category 'A', 'B' or 'S' Licensee? If Category 'A', at what point in your development (if any) do you expect to achieve Category 'B' status?
<i>[For Licensed Operators only]</i>	

Although the reporting of non-mandatory parameters for Category 'B' Licensees is still one year away, the Director wishes to have the contents, format and mechanics of the performance measurement programme agreed in advance. This will be of benefit to the OLOs because:

- they will be able to take the programme into account when developing their systems and procedures
- the requirement for performance data reporting will still apply to the SMP operator prior to 1st June 2000.

The Director will ensure that the reporting burdens placed on the SMP operator will be reflected in those for Category 'B' operators after the 1st June 2000 deadline. Although there will therefore be no immediate impact on most operators, the Director believes that it is important that the views of all interested parties are made known at this stage as the performance measurement programme which will be adopted arising from this consultative process will be imposed on all appropriate operators in the future.

Item 5.3.D	Does your company intend to take part in this programme voluntarily when it moves from Category 'A' to 'B'? If not, please state your reasons.
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6 Determining Suitable Parameters

6.1 Introduction

The relevant Directives and Regulations mandate a limited set of performance measurements. The Director wishes to extend this set, in line with the principles already set out in this document. The parameters will balance the:

- need to gather appropriate data on operator performance
- Director's wish to inform consumers
- Director's duty to ensure the development of a competitive market
- burden placed on qualifying operators to collect the required data.

The Licence applications of existing Licensed Operators contain information on the type of performance data that will be monitored by the operators, either for their own purposes or as part of an industry wide programme. The Director has taken this into account. The proportion of operators already proposing or utilising such measures is shown later in Table 2.

The General Licence states that the Director shall have due regard to parameters set out in appropriate European (ETR) Regulations⁶. Having reviewed these Regulations and in light of submissions from both Licensed Operators and other EU NRAs, the Director wishes to use such ETRs as a basis for the parameters proposed. However she is mindful that:

- the descriptions of some of the parameters in the appropriate ETRs are not sufficiently precise to be used as the definitive definition for the Director's purposes. The Director understands that the current review of ETR 138⁷ should shortly provide greater accuracy in the definition of parameters
- to allow the measurements to be effectively undertaken, these definitions require agreement amongst all the appropriate operators to ensure comparability of results.

The Director is conscious of the need to appropriately define the parameters to be used. In order to agree appropriate definitions, the Director will request licensees to submit details of any systems for performance measurement which they currently have in place, or are in place within their Group structure. The Director will review this information with a view to adopting, where possible, systems common to a large number of operators, or ones that are the simplest and clearest to apply. The Director hopes to be in a position to issue conventions on the calculation of performance indicators in the autumn.

⁶ ETR 138 for voice telephony and ISDN, ETR 038 for leased lines

⁷ Quality of service indicators for Open Network Provision (ONP) of voice telephony and Integrated Services Digital Network (ISDN) – December 1997.

Item 6.1.A	Do you agree with the Director’s approach to defining the parameters to be adopted.
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Item 6.1.B	Do you agree with the Director’s decision to use variations on applicable ETRs as the basis for the quantitative performance measures? If not, please state your reasons.
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6.2 Issues to be Subject to Performance Measurement

The Director proposes that the topics shown in Table 2 are dealt with in the parameters collected from General Licensees. Different topics will apply to different operator types, depending on their “Category”.

Table 2 : Areas for Parameters Applicable to all Category ‘B’ and ‘S’ Licensees

Topic	Description	Proportion of Responses containing this measure ⁸
Service provision	The provision of service to customers as a result of a firm customer order.	85%
Fault management	The number of faults reported by customers and the management of these faults.	95%
Complaints	The number and types of complaints from customers.	15%
Billing	The accuracy of bills.	20%
Disconnection	The number and reasons for disconnection of residential customers.	0%

The Director has reviewed the benefits, or otherwise, of requiring General Licensees to collect specialised technical performance parameters (e.g. post dial delay) of their networks. She has decided not to require this of General Licensees because:

- the different natures of the networks of OLOs and the SMP operator does not allow for direct comparison of performance
- performance of new and expanding networks differs from that of a well established network, such as that of the SMP operator

⁸ The percentage of General Licensees which intend (or do) use this parameter for internal purposes or which have stated the intention to provide measurements to the ODTR on such a parameter. Statements were taken from License applications, subsequent submissions from Licensed Operators as well as the responses to the initial data gathering exercise prior to the publication of this consultation document.

- the collection of such statistics for OLOs may prove burdensome, e.g. it may require special testing, rather than the collection of automatically generated statistics from the operational network
- the value of such technical statistics to the public is limited
- OLOs may specialise in the types of services they provide or customers that they target and so may not be directly comparable even for “basic telephony services”.

Item 6.2.A	Do you agree with the subject areas proposed by the Director? If not, please state your reasons and propose alternatives if required.
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Item 6.2.B	Do you agree with the Director’s decision to exclude specific technical parameters for the majority of operators? If not, please state your reasons.
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The Director considers that the USO of the SMP operator places a requirement on the Director to request supplemental information so that the Director can ensure:

- customers and services which are dependent on the USO are provided with a level of quality which reflects that expected by the Director
- the SMP operator’s performance towards OLOs is compatible with the maintenance of a “level playing field” between the OLOs and the retail arm of the SMP operator when Carrier Services are provided.

The SMP operator will provide supplemental data regarding those subject areas outlined in Table 3. The parameters are defined in Appendix IV.

Table 3 : Additional Performance Parameter Subjects for the SMP Operator

Topic	Description
Table 2 parameters for OLOs	Parameters contained in Table 2 which are pertinent to carrier services supplied to OLOs by the SMP operator.
Operator Assistance Services	The performance of the Operator Assistance service provided by the SMP operator.
Directory Enquiry Services	As above but for Directory Enquiries.
Public Payphones	The availability of public card and coin payphones wholly managed by the SMP operator.

Item 6.2.C	Do you agree with the Director’s rationale for requiring reporting on additional performance parameter subjects from the SMP operator? If not, please state your reasons.
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Item 6.2.D	Do you agree with the additional performance parameter subjects proposed? If not, please state your reasons and
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	propose alternatives if appropriate.
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6.3 Other Parameters

The Director reserves the right to include additional parameters for either OLOs or the SMP operator, under the terms of the General Licences and the appropriate legislation.

6.4 Definition of Quantitative Parameters

Table 4 shows lists of the parameters proposed against each of the areas identified in Section 6.2. Detailed definitions of each parameter are attached as Appendices II, III and IV to this document.

Table 4 : Parameters to be Measured

Ref No.	Name
Applicable to all General Licences	
<i>Complaints</i>	
II.1.1	Number of Registered Complaints
(i)	Total number of complaints
(ii)	Number of complaints by reporting category
(iii)	Number of complaints per 100 lines (for direct access customers)
(iv)	Number of complaints per 100 indirect customers
II.1.2	Number of Registered Complaints Resolved within 20 working days⁹
(i)	Number of registered complaints resolved within 20 days
(ii)	Proportion of complaints which are resolved within 20 days
<i>Disconnection for non-payment (residential customers with exchange lines from the operator)</i>	
II.2.1	Disconnection for non-payment of bills
(i)	Gross disconnection rate per 1000 lines
(ii)	Net disconnection rate per 1000 lines
Applicable to Category 'B' and 'S' Licensees	
<i>Service Provision</i>	
III.1.1	Proportion of orders completed on or before the date promised to the customer (direct access telephony)
(i)	Proportion of orders completed on or before the date promised
III.1.2	Variance from promised delivery date (direct access telephony)
(i)	Time line distribution of orders delivered after promised date
III.1.3	Proportion of orders completed on or before the date promised to the customer (indirect access telephony)
(i)	Proportion of orders completed on or before the date promised
III.1.4	Variance from promised delivery date (indirect access telephony)
(i)	Time line distribution of orders delivered after promised date
III.1.5	Proportion of orders completed on or before the date promised to the customer (leased lines)
(i)	Proportion of orders completed on or before the date promised

⁹ i.e. within 1 month.

III.1.6	Variance from promised delivery date (leased lines)
(i)	Time line distribution of orders delivered after promised date
<i>Fault Management</i>	
III.2.1	Customer reported faults per 100 direct access telephony lines
(i)	Customer reported faults per 100 lines
III.2.2	Customer reported faults per 100 registered indirect customers
(i)	Customer reported faults per 100 registered indirect customers
III.2.3	Fault Restoration by Target Time
(i)	Percentage of faults cleared within target time
III.2.4	Variance from Target Repair Time
(i)	Distribution of actual repair times for fault reports outstanding after the target time
III.2.5	Response to Fault Reports (leased lines)
(i)	Percentage of faults responded to within target time
III.2.6	Variance in Response Time (leased lines)
(i)	Distribution of actual response times for fault reports outstanding after the target time
<i>Billing</i>	
III.3.1	Billing Accuracy
(i)	Number of billing accuracy complaints per 1000 bills issued
<i>Complaints</i>	
III.4.1	Call Statistics for Complaints Handling Line¹⁰
(i)	Total number of calls to the complaints line
(ii)	Mean time to answer for the period
(iii)	Mean holding time

¹⁰ To ensure that customers are able to make complaints, and that the complaints statistics are not adversely affected by the performance of the complaints line.

Supplemental Performance Parameters Applicable to the SMP Operator	
<i>Performance towards OLOs</i>	
IV.1.1	Number of Registered Complaints
IV.1.2	Number of Registered Complaints Resolved within 20 working days
IV.1.3	Number of Registered Complaints Requiring Dispute Resolution
IV.1.4	Proportion of orders completed on or before the date promised to the customer (by carrier service)
IV.1.5	Variance from promised delivery date (by carrier service)
IV.1.6	Response to Fault Reports (by carrier service)
IV.1.7	Variance in Response Time (by carrier service)
IV.1.8	Availability of leased lines
(i) or (ii)	Availability of leased lines
IV.2.1	Call Statistics for Operator Assistance Service
(i)	Total number of calls to OAS
(ii)	Mean time to answer for the period
(iii)	Mean holding time
IV.3.1	Call Statistics for Directory Enquiries
(i)	Total number of calls to DQ
(ii)	Mean time to answer for the period
(iii)	Mean holding time
(iv)	Total number of telephone number look-ups performed
(v)	Number of unsuccessful look-ups
(vi)	Failure rate for DQ look-ups
(vii)	Average number of look-ups per DQ call
IV.4.1	Availability (i.e. in working order) of card and coin operated public pay phones
(i)	Average number of public payphones in operation
(ii)	Proportion of payphones in working order

Item 6.4.	Do you accept the parameters as defined in Appendices II, III and IV? If not, what revisions would you make and for what reason? (please refer to the parameter reference number)
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6.5 Parameters for Publication

The Director has considered the parameters which she believes are appropriate for publication, taking into account the principles laid down earlier in this consultation paper. Table 5 shows whether a parameter in Table 4 should be published and the Director's reason for publishing / not publishing such a parameter. The Director is very much in favour of openness, but must also have regard to the need to ensure that information published is comparable and not open to misinterpretation. The value of the publication would be very much diminished if this consideration were ignored. In time, as the programme is established the range of published information will be reviewed.

In other cases the data will be collected for the internal use of the ODTR. Such information will remain confidential to the ODTR.

Table 5 : Parameters for Publication

Ref No.	Name	Publish	Reason
Applicable to all General Licences			
<i>Complaints</i>			
II.1.1	Number of Registered Complaints		
(i)	Total number of complaints	n	This is not a directly comparable statistic and could be misinterpreted.
(ii)	Number of complaints by reporting category	n	Level of detail which is not suitable for public consumption. The inclusion of a single category for 'other services' may lead to misinterpretation of results.
(iii)	Number of complaints per 100 lines (for direct access customers)	y	Public interest, readily understandable metric which allows direct comparison.
(iv)	Number of complaints per 100 indirect customers	y	Public interest, readily understandable metric which allows direct comparison.
II.1.2	Number of Registered Complaints Resolved within 20 working days		
(i)	Number of registered complaints resolved within 20 days	n	Level of detail which is not suitable for public consumption. [see II.1.1 (ii)]
(ii)	Proportion of complaints which are resolved within 20 days	y	Public interest, readily understandable metric which allows direct comparison.
<i>Disconnection for non-payment (residential customers with exchange lines from the operator)</i>			
II.2.1	Disconnection for non-payment of bills		
(i)	Gross disconnection rate per 1000 lines	n	Information for internal use of ODTR.
(ii)	Net disconnection rate per 1000 lines	n	Information for internal use of ODTR .
Applicable to Qualified Licensees			
<i>Service Provision</i>			
III.1.1	Proportion of orders completed on or before the date promised to the customer (direct access telephony)		
(i)	Proportion of orders completed on or before the date promised	y	Public interest, readily understandable metric which allows direct comparison.
III.1.2	Variance from promised delivery date (direct access telephony)		

(i)	Time line distribution of orders delivered after promised date	y	Public interest, readily understandable metric which allows direct comparison.
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III.1.3	Proportion of orders completed on or before the date promised to the customer (indirect access telephony)		
(i)	Proportion of orders completed on or before the date promised	y	Public interest, readily understandable metric which allows direct comparison.
III.1.4	Variance from promised delivery date (indirect access telephony)		
(i)	Timeline distribution of orders delivered after promised date	y	Public interest, readily understandable metric which allows direct comparison.
III.1.5	Proportion of orders completed on or before the date promised to the customer (leased lines)		
(i)	Proportion of orders completed on or before the date promised	y	Public interest, readily understandable metric which allows direct comparison.
III.1.6	Variance from promised delivery date (leased lines)		
(i)	Timeline distribution of orders delivered after promised date	y	Public interest, readily understandable metric which allows direct comparison.
<i>Fault Management</i>			
III.2.1	Customer reported faults per 100 direct access telephony lines		
(i)	Customer reported faults per 100 lines	y	Public interest, readily understandable metric which allows direct comparison.
III.2.2	Customer reported faults per 100 registered indirect customers		
(i)	Customer reported faults per 100 registered indirect customers	y	Public interest, readily understandable metric which allows direct comparison.
III.2.3	Fault Restoration by Target Time		
(i)	Percentage of faults cleared within target time	y	Public interest, readily understandable metric which allows direct comparison.
III.2.4	Variance from Target Repair Time		
(i)	Distribution of actual repair times for fault reports outstanding after the target time	y	Public interest, readily understandable metric which allows direct comparison.
III.2.5	Response to Fault Reports (leased lines)		
(i)	Percentage of faults responded to within target time	y	Public interest, readily understandable metric which allows direct comparison.
III.2.6	Variance in Response Time (leased lines)		
(i)	Distribution of actual response times for fault reports outstanding after the target time	y	Public interest, readily understandable metric which allows direct comparison.
<i>Billing</i>			
III.3.1	Billing Accuracy		
(i)	Number of billing accuracy complaints per 1000 bills issued	n	Information for internal use of ODTR.
<i>Complaints</i>			
III.4.1	Call Statistics for Complaints Handling Line		
(i)	Total number of calls to the complaints line	n	Information for internal use of ODTR
(ii)	Mean time to answer for the period	n	Information for internal use of ODTR
(iii)	Mean holding time	n	Information for internal use of ODTR

Supplemental Performance Parameters Applicable to the SMP Operator			
<i>Performance towards OLOs</i>			
IV.1.1	Number of Registered Complaints	n	Information for ODTR use in monitoring fair competition.
IV.1.2	Number of Registered Complaints Resolved within 20 working days	n	Information for ODTR use in monitoring fair competition.
IV.1.3	Number of Registered Complaints Requiring Dispute Resolution	n	Information for ODTR use in monitoring fair competition.
IV.1.4	Proportion of orders completed on or before the date promised to the customer (by carrier service)	n	Information for ODTR use in monitoring fair competition.
IV.1.5	Variance from promised delivery date (by carrier service)	n	Information for ODTR use in monitoring fair competition.
IV.1.6	Response to Fault Reports (by carrier service)	n	Information for ODTR use in monitoring fair competition.
IV.1.7	Variance in Response Time (by carrier service)	n	Information for ODTR use in monitoring fair competition.
IV.1.8	Availability of leased lines		
(i) or (ii)	Availability of leased lines	n	Information for ODTR use in monitoring fair competition.
IV.2.1	Call Statistics for Operator Assistance Service		
(i)	Total number of calls to OAS	y	Public interest
(ii)	Mean time to answer for the period	y	Public interest
(iii)	Mean holding time	n	Information for ODTR monitoring of USO performance.
IV.3.1	Call Statistics for Directory Enquiries		
(i)	Total number of calls to DQ	y	Public interest
(ii)	Mean time to answer for the period	y	Public interest
(iii)	Mean holding time	n	Information for ODTR monitoring of USO performance.
(iv)	Total number of telephone number look-ups performed	n	Information for ODTR monitoring of USO performance.
(v)	Number of unsuccessful look-ups	n	Information for ODTR monitoring of USO performance.
(vi)	Failure rate for DQ look-ups	n	Information for ODTR monitoring of USO performance. This will not be published because accuracy of information may be affected by a number of sources, not just T�.
(vii)	Average number of look-ups per DQ call	n	Information for ODTR monitoring of USO performance.
IV.4.1	Availability (i.e. in working order) of card and coin operated public pay phones		
(i)	Average installed base of public payphones	y	Public interest
(ii)	Proportion of payphones in working order	y	Public interest

Item 6.5.	Do you accept the Director's selection of parameters for publication? If not, please state the amendments you would make and your reasons for same?
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7 Methodology for the Measurement Programme

7.1 Reporting

As indicated earlier, the Director wishes to minimise the burden placed on Licensees in collecting accurate and timely required data for the measurement programme. The reporting of the data to ODTR is an essential part of the overall programme and in deciding on the frequency of the reporting, the Director is mindful to balance the burden on the Licensees with the needs of the ODTR. The Director proposes that:

- all statistics to be provided within four weeks of the end of every quarter (i.e. periods ending March, June, September and December).
- reports use standard electronic documents.

Item 7.1.A	In your opinion, are these timescales reasonable and achievable? If not, please state your reasons.
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7.2 Auditing the Results

One of the purposes of conducting a consultation exercise is to agree a procedure for the collection and publishing of the results. An integral part of the process is to ensure that adequate procedures are in place to confirm the accuracy of the data provided. As indicated in Section 6.1, precise details of how the parameters are to be calculated are to be developed by ODTR following this consultation.

It is intended that the maintenance of data for the calculation of performance indicators will be subject to audit by ODTR. Six weeks prior to publication the ODTR will provide to each operator a statement listing all data from that operator that is to be published and information on any calculations carried out on the data supplied. The ODTR will review, and as appropriate amend, its material for publication in respect of any reasoned corrections proposed by the operator provided that it is supplied to ODTR within two weeks.

Item 7.2.A	Does the Director's proposed process provide for an adequate audit of the data? If not, please state your reasons and, if possible, propose an alternative.
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8 Publication of Information

8.1 Mechanisms

Each Category ‘B’ and ‘S’ Licensee is required to publish information in accordance with SI 71 of 1999. In addition, the Director proposes to collate all the information provided to her office and separately publish a consolidated document, covering all participating Licensees.

The Director proposes to publish information every six months, incorporating one year’s results in each publication. In this manner the public can be given a rolling review of annual performance.

Publication would take the form of:

- issuing of electronic copies of the publication to the participating operators¹¹
- a press release from the ODTR
- placement of the latest publication on the ODTR web-site (www.odtr.ie) which will be free to download, and hard copies available from ODTR.
- publication in the National press.

Item 8.1.	Do you agree with the Director’s proposals for the publication of the results from the performance measurement programme? If not, please state your reasons.
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8.2 Editorial

In order to assist the public in its interpretation of the data the Director proposes that an *Introduction* be produced which explains issues that should be taken into account when examining the data in detail. This *Introduction* will be circulated to all contributing operators for comment prior to the first publication. The Director’s initial proposals for the issues to be highlighted are:

- *geographic coverage* : the coverage of each operator will vary, with some being locally focussed, whilst others have regional, national or international coverage. Therefore factors which affect one operator as a result of geography may have different impacts on other operators. For example, a local failure may have a major impact on the performance of a local service provider, but only a minor impact on a few customers of an international network operator.

¹¹ By supplying this document to customers and as the result of enquiries, the operator will be deemed to have discharged its obligations to publish information, without the need to produce a separate document itself.

- *the size of the operator* : operators reporting in the publication will vary markedly in size from the large well established operators, to new market entrants which are significantly smaller. The impact of one-off equipment failures on smaller, newer operators may be larger than similar failures in larger, established operators.
- *market focus* : many different types of customers exist in the market from individual households through small and medium sized business to large corporate enterprises. Different operators may target all or just some of these customers. Consequently the levels of service offered to different customer types may also vary. The statistics published have an emphasis on the operators ability to keep its promises to customers, rather than a direct comparison of performance, which would be misleading.
- *working week* : different operators have different working weeks (e.g. 0800-1800 Monday - Friday or 0900-1730 Monday - Saturday). Statistics are presented such that they represent the operators performance in terms of the working days taken to achieve a goal.
- *commitments to customers* : the indices which have been published mainly deal with an operators ability to meet its commitments to customers. It should be noted that:
 - target times for the completion of a task may differ for each operator
 - measurement of the target time for a task and the actual time may be in elapsed or working time, dependent on the operator's method of quotation.

Item 8.2.	What additional issues, if any, would you wish to see covered in the Introduction at the beginning of any published reports?
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8.3 Timing

It is proposed that TÉ would provide the first set of material for end March 2000 and the first publication would be done at the end of June 2000. First reports for other operators would be due for end September 2000 and/or publication at the end of that year.

Item 8.3.	Do you agree with the timetable above ? If not please give your reasons.
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9 Submitting Comments

The consultation period will run from 13th July to 31st August 1999 during which the Director welcomes written comments on any of the issues raised in this paper. Having analysed and considered the comments received, the ODTR will review the contents of any performance measurement programme and publish a report on the consultation in September 1999. In order to promote further openness and transparency the ODTR may summarise the responses received as part of its report on this consultation.

All comments are welcome, but it would make the task of analysing responses easier if comments were referenced to the relevant question numbers from this document. The Director appreciates that many of the issues raised in this paper may require respondents to provide a considerable amount of commercially sensitive information if their comments are to be meaningful. Respondents are requested to clearly identify confidential material and if possible to include it in a separate annex to the response. Such information will be treated as strictly confidential. {If possible, comments should be submitted in electronic form, by email or on diskette}.

All responses to this consultation should be clearly marked "Reference: Submission re ODTR 99/41 and sent by post, facsimile or e-mail to:

Mr. Peter McKenna
Office of the Director of Telecommunications Regulation
Irish Life Centre
Abbey Street
Dublin 1
Ireland

Telephone : +353-1-804.9600

Fax: +353-1-804.9680

Email: mckennap@odtr.ie

to arrive on or before 5pm on 31st August 1999.

Apart from acknowledging receipt of such communications, the Director regrets that she will be unable to enter into correspondence with persons contributing comments on this consultation paper.

The Director undertakes to have examined all submissions which are properly made and to consider the points made therein in the context of her future policy and actions in relation to the measurement of Licensed Operator performance. However, the Director is not obliged to accept any views, opinions, comments or suggestions received as part of this consultation process or to incorporate them into her future policies or actions.

Office of the Director of Telecommunications Regulation
13th July, 1999

This consultation paper does not constitute legal, commercial or technical advice. The Director is not bound by it. The Consultation is without prejudice to the legal position of the Director or her rights and duties to regulate the market generally.

Appendix I - Acronyms used in Consultation Paper

CLI	Calling line identity
CPE	Customer premises equipment
DQ	Directory enquiries
ESOMAR	European Society for Opinion and Marketing Research
ETR	ETSI Technical Report
ETSI	European Telecommunications Standards Institute
EU	European Union
FNF	Fault not found
ICC	International Chamber of Commerce
ISDN	Integrated services digital network
NRA	National regulatory authority
NTP	Network terminating point
OAS	Operator assistance service
ODTR	Office of the Director of Telecommunications Regulation
OLO	Other licensed operator
O&M	Operations and maintenance
ONP	Open network provision
PSTN	Public switched telephone network
RIO	Reference interconnect offer
RWT	Right when tested
SMP	Significant market power
TÉ	Telecom Éireann
USO	Universal service obligation

APPENDIX II: Performance Parameters Applicable to All General Licensees

Complaints

II.1.1 Number of Registered Complaints	
Purpose	The Director wishes all Licensees to record the number of complaints made by customers. This information should be provided so that the Director can gauge customer satisfaction with the Licensee and the Licensee's own ability to deal with complaints.
Applicable Services	The data shall be presented separately for: <ul style="list-style-type: none"> • direct access telephony • indirect access telephony • public card or coin payphones • all other services combined
Applicable Segments¹²	(a) Residential customers (b) Business ¹³ customers
Information Provided¹⁴	
(i)	Total number of registered complaints by category ¹⁵
(ii)	Average population of lines in reporting period <i>for direct access customers in the applicable segment</i>
(iii)	Average number of indirect registrations in the reporting period <i>for the indirect access service in the applicable segment</i>
Calculation¹⁶	
(i)	Total Number of Complaints = Sum of all complaints from each category
(ii)	Number of Complaints (by category) = as reported
(iii)	Number of Complaints per 100 lines (by customer segment) = [Total number of registered complaints by category] x 100 / [Average population of lines in reporting period]
(iv)	Number of Complaints per 100 indirect customers (by customer segment) = [Total number of registered complaints by category] x 100 / [Average number of indirect registrations in the reporting period]
Definitions	
1)	Complaint is defined as one which is formally registered as the result of oral or written communication between the parties, whether the complainant is a user or other member of the public.
2)	A Line is a circuit or part thereof which is capable of supporting one speech or data path between CPE and a local exchange.
3)	The average population is taken to be the total at the start of the

¹² Data shall be presented separately for each segment, except for payphones.

¹³ Excluding OLOs as a Business Customer of the SMP operator.

¹⁴ By the operator.

¹⁵ One category = one service class and one customer segment combination, thus there are 7 possible categories, as payphones is not segmented by customer type.

¹⁶ To be made by the ODTR.

	reporting period plus the total at the end of the reporting period divided by two.
4)	Registration - A recognised calling line identity (CLI), authority code or pin number enabled by the operator to allow network access. The average population is calculated in a similar manner as defined in (3).
Notes:	
<ul style="list-style-type: none"> • A complaint should not be confused with a query (a request for information) or with a fault report (when a customer is reporting a service or equipment failure, etc..) • The inclusion of the complaint is independent of whether or not the complaint is deemed to be justified by the operator. • The definitions include those events where a customer has a complaint which is satisfactorily resolved at the first point of contact. • Operators must notify the ODTR, in advance of data collection, which complaint channels, e.g. written, telephone, personal visit, will be included and which will not be included for the purposes of this measure. Explicit reasons for exclusion must be provided by the operator and accepted by the ODTR. • Operators must notify the ODTR of any channels that are subsequently included. • A single received complaint which involves several service issues requiring different time frames to resolve shall nonetheless be counted as one complaint; it shall not be deemed to be resolved until all the individual issues are themselves resolved. • Bill Accuracy complaints covered in parameter III.3.1, should also be included in this measure. • A complaint about how a fault has been handled counts as a complaint, although the original fault report does not count as a complaint. 	

II.1.2 Number of Registered Complaints Resolved within 20 working days	
Purpose	The Director wishes all Licensees to record the number of complaints resolved within 20 working days of registration.
Applicable Services	The data shall be presented separately for: <ul style="list-style-type: none"> • direct access telephony • indirect access telephony • public card or coin payphones • all other services combined.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Total number of registered complaints resolved within 20 working days by category
Calculation	
(i)	Number of registered complaints resolved within 20 working days
(ii)	Proportion of Complaints which are resolved within 20 days (by category) = [Total number of registered complaints resolved within 20 working days by category] / [Total number of complaints by category] <i>(from II.1.1)</i>

Definitions	
1)	Resolved shall be deemed to mean to the customer's satisfaction, such that no further communication on the issue is made between the parties.
2)	Each operator shall provide its definition of working days to the ODTR.

II.1.3 Number of Registered Complaints Requiring Dispute Resolution	
Purpose	The Director wishes all Licensees to record the number of complaints that require third party dispute resolution, whether by the ODTR or other.
Applicable Services	The data shall be presented separately for: <ul style="list-style-type: none"> • direct access telephony • indirect access telephony • public card or coin payphones • all other services combined.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Total number of registered complaints requiring dispute resolution by category
Calculation	
(i)	Number of registered complaints requiring dispute resolution by category
(ii)	Proportion of Complaints which require dispute resolution (by category) = [Total number of registered complaints requiring dispute resolution by category] / [Total number of complaints by category] (<i>from II.1.1</i>)
Definitions	
1)	Dispute resolution refers to any procedure that involves third party intervention to resolve a dispute. ¹⁷

¹⁷ Currently the subject of another Consultation Paper.

Disconnection for non-payment

II.2.1 Disconnection for non-payment of bills	
Purpose	To determine how successful an operator is in avoiding disconnection of residential subscribers from the PSTN for non-payment of bills
Applicable Services	direct access telephony
Applicable Segments	
(a)	Residential customers
Information Provided	
(i)	Total number of lines disconnected in the reporting period
(ii)	Total number of re-connections which resulted from disconnection in a previous reporting period ¹⁸
Calculation	
(i)	Gross Disconnection Rate per 1000 lines = [Total number of lines disconnected in the reporting period] X 1000 / [Average population of lines in reporting period] <i>from II.1.1</i>
(ii)	Net Disconnection Rate per 1000 lines = ([Total number of lines disconnected in the reporting period] – [Total number of re-connections which resulted from disconnection in a previous reporting period]) X 1000 / [Average population of lines in reporting period] <i>from II.1.1</i>
Definitions	
1)	<p>A disconnection for non-payment is an action taken by the operator to prevent the customer from making out-going and receiving any in-coming calls where the operator considers the customer has failed to pay sums due for the telephony service provided.</p> <p>Disconnection also include cases where the customer can only make or receive calls to the operator or emergency services.</p>
2)	<p>Other cessations such as where the customer for example:</p> <ul style="list-style-type: none"> • moves house • dies • changes telephony company • or any other customer-initiated cessation. <p>Barring of out-going calls at the request of the customer does not constitute a disconnection of service</p>

¹⁸ The operator shall determine the number of reporting periods over which records are kept and inform the ODTR for audit purposes.

APPENDIX III: Performance Parameters Applicable to Category 'B' and 'S' Licensees

Service Provision

III.1.1	Proportion of orders completed on or before the date promised to the customer (direct access telephony)
Purpose	This measure determines how well a Licensed Operator keeps its commitments to install direct access basic telephony services by a committed or contracted date.
Applicable Services	The data shall be presented for direct access telephony customers, both PSTN and ISDN combined.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Total orders completed on or before the date confirmed/contracted with the customer during the period (by category)
(ii)	All orders completed during the period (by category)
Calculation	
(i)	Proportion of orders completed on or before the date promised = [Total orders completed on or before the date confirmed/contracted with the customer during the period] x 100/ [All orders completed during the period] (by category)
Definitions	
1)	An order is defined as a commitment made to a customer to provide a product or service.
2)	Completion is defined as the point when all items are available for use by the customer as confirmed by the operator and billing is put into effect.
Notes:	<ul style="list-style-type: none"> • A single order may include installation of multiple lines etc. at multiple sites. • All orders where the dates are changed at the request of the customer will not be counted as a missed commitment unless the subsequent rescheduled date is missed. Notes on the order are required to reflect the precise reason for the reschedule. • All orders where the dates are changed as result of no access to the customer's premises at the time of the scheduled or rescheduled appointment will not be counted as a missed commitment unless the subsequent rescheduled date is missed. Notes on the order are required to reflect the precise reason for the reschedule. • The measure refers to the date confirmed or contracted with the customer. In practice these terms both refer to the date committed to deliver the service to the customer.
Exclusions:	<ul style="list-style-type: none"> • All orders for cessation of service. • All orders which are cancelled by the customer before the installation is completed. • All orders which only require the delivery of hardware through the post and receipt is not subsequently confirmed with the customer.

III.1.2 Variance from promised delivery date (direct access telephony)	
Purpose	This measure demonstrates the spread of late deliveries after the promised date.
Applicable Services	The data shall be presented for direct access telephony customers, both PSTN and ISDN combined.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Customer orders completed by agreed delivery date plus x days (by category)
	To be provided in ranges x = 1 day, 5 days, 20 days and > 20 days
Calculation	
(i)	For all remaining orders which are delivered subsequent to the due date: [Customer orders completed by agreed delivery date plus x days] X 100/ [Total number of orders completed] (by category)
	To be presented in ranges x = 1 day, 5 days, 20 days and > 20 days

III.1.3 Proportion of orders completed on or before the date promised to the customer (indirect access telephony)	
Purpose	This measure determines how well a Licensed Operator keeps its commitments to install indirect basic telephony services by a committed or contracted date.
Applicable Services	The data shall be presented for indirect access telephony customers.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Total orders completed on or before the date confirmed/contracted with the customer during the period (by category)
(ii)	All orders completed during the period (by category)
Calculation	
	Proportion of orders completed on or before the promised date = [Total orders completed on or before the date confirmed/contracted with the customer during the period] x 100/ [All orders completed during the period]
Definitions	
1)	An order shall be deemed to be fulfilled when it is completed as defined in the contract between the parties.

Notes:

- A single order may include enabling services of multiple calling line identities (CLIs)/Authorisation Codes etc. at multiple sites.
- Where the dates are changed at the request of the customer they will not be counted as missed unless the subsequent rescheduled date is missed.
- All orders where the dates are changed as a result of no access to the customer's premises will not be counted as missed unless the subsequent rescheduled date is missed.

Exclusions:

- All orders for cessation of service
- All orders which are cancelled or postponed by the customer before the installation is completed
- All orders which only require the delivery of hardware through the post and receipt is not subsequently confirmed with the customer
- All orders with an unacceptable credit rating prior to provision.
- All orders awaiting further information from the customer. Service provision will be deemed to have commenced on receipt of outstanding data.
- Administration additions or alterations. For the purposes of recording changes to existing services, the following are excluded: spelling amendments, changes of address/name requests.

III.1.4 Variance from promised delivery date (indirect access telephony)	
Purpose	This measure demonstrates the spread of late deliveries after the promised date.
Applicable Services	The data shall be presented for indirect access telephony customers.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	[Customer orders completed by agreed delivery date plus x days] (by category) To be provided in ranges $x = 1$ day, 5 days, 20 days and > 20 days
Calculation	
(i)	For all remaining orders which are delivered subsequent to the due date: [Customer orders completed by agreed delivery date plus x days] X 100/ [Total number of orders completed] (by category) To be presented in ranges $x = 1$ day, 5 days, 20 days and > 20 days

III.1.5 Proportion of orders completed on or before the date promised to the customer (leased lines¹⁹)	
Purpose	This measure determines how well a Licensed Operator keeps its commitments to install digital leased line services by a committed or contracted date.
Applicable Services	The data shall be presented separately for analogue and digital leased lines.
Applicable Segments (a)	Business customers
Information Provided	
(i)	Total orders completed on or before the date confirmed/contracted with the customer during the period (by category)
(ii)	All orders completed during the period (by category)
Calculation	
(i)	Proportion of orders completed on or before the date promised = [Total orders completed on or before the date confirmed/contracted with the customer during the period] x 100/ [All orders completed during the period] (by category)
Notes:	
<ul style="list-style-type: none"> As for Direct Access Telephony 	

III.1.6 Variance from promised delivery date (leased lines)	
Purpose	This measure demonstrates the spread of late deliveries after the promised date.
Applicable Services	The data shall be presented separately for analogue and digital leased lines.
Applicable Segments (a)	Business customers
Information Provided	
(i)	Customer orders completed by agreed delivery date plus <i>x</i> days (by category)
	To be provided in ranges <i>x</i> = 1 day, 5 days, 20 days and > 20 days
Calculation	
(i)	For all remaining orders which are delivered subsequent to the due date: [Customer orders completed by agreed delivery date plus <i>x</i> days] X 100/ [Total number of orders completed] (by category)
	To be presented in ranges <i>x</i> = 1 day, 5 days, 20 days and > 20 days

¹⁹ All parameters deal with national leased lines only.

Fault Management

III.2.1 Customer reported faults per 100 direct access telephony lines	
Purpose	This is a measure of the reliability of the service, in terms of its affect on customers connected.
Applicable Services	The data shall be presented for direct access telephony customers, both PSTN and ISDN combined.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Total Customer Reported Faults received in period (by category)
Calculation	
(i)	Customer reported faults per 100 lines = [Total Customer Reported Faults received in period] x 100/ [Average population of lines during the period] <i>(from II.1.1)</i>
Definitions	
1)	A Customer Reported Fault is defined as a customer report of the inability of an item to perform a required function resulting in an impaired service excluding that inability due to preventative maintenance.
2)	Customer Education - Fault reports may be considered to be resolved by customer education if the trouble resolution is related to the operation of a product or service.
3)	Subsequent Fault Report: - A subsequent fault report is a report taken against the same customer line, with the same fault conditions, as the existing report while there is an existing fault report already in existence.
4)	Repeated Fault Report: - A repeated fault report is a fault report received on a customers direct line within a designated time period, as defined by the operator, from closure of an earlier report of a fault against the same customer line The time period is usually 30 to 90 days.
Notes:	
<ul style="list-style-type: none"> • Fault Not Found (FNF) and Right When Tested (RWT) are to be included. • Repeated Fault Reports (as defined above) are to be included. 	
Exclusions:	
<ul style="list-style-type: none"> • Faults in all equipment beyond the Network Termination Point (NTP). The Network Termination Point is defined as the service presentation point. • Faults in customer-owned/rented premises equipment • Fault reports due to customer provided power • Fault reports that are resolved by customer education relating to the operation of a product or service. • Subsequent fault reports 	

III.2.2 Customer reported faults per 100 registered indirect customers	
Purpose	This is a measure of the reliability of the service, in terms of its affect on customers connected.
Applicable Services	The data shall be presented for indirect access telephony customers.
Applicable Segments	<p>(a) Residential customers where</p> <p>(i) Faults are reported against the service as a whole</p> <p>(ii) Customer-reported faults are found within that part of the network and CPE under the direct control of the operator</p> <p>(b) Business customers where</p> <p>(i) Faults are reported against the service as a whole</p> <p>(ii) Customer-reported faults are found within that part of the network and CPE under the direct control of the operator</p>
Information Provided	
(i)	Total Customer Reported Faults receive in period
Calculation	
(i)	Customer reported faults per 100 registered indirect customers = [Total Customer Reported Faults receive in period] x 100/ [Average population of enabled indirect service registrations during the same period] (<i>from II.1.1</i>)
Notes:	
<ul style="list-style-type: none"> Where a single customer has been provided with service for a number of CLIs, each CLI shall count as a single registration. 	
Inclusions:	
<ul style="list-style-type: none"> Fault Not Found (FNF) and Right When Tested (RWT) Repeated Fault Reports Where the operator providing the indirect service owns and maintains Customer Premises Equipment (CPE) or has a contract to maintain CPE, faults attributable to the CPE shall be included. 	
Exclusions:	
<ul style="list-style-type: none"> Faults at the customer-owned CPE, that is maintained under contract to an agent other than the Licensee Fault reports due to customer provided power Fault reports that are resolved by customer education relating to the operation of a product or service. Subsequent fault reports. 	

III.2.3 Fault Restoration by Target Time	
Purpose	To demonstrate the operator's performance in restoring service within the published target time.
Applicable Services	The data shall be presented separately for: <ul style="list-style-type: none"> • direct access telephony • indirect access telephony
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Total fault reports cleared by target time during the period
(ii)	Total fault reports cleared during the period
Calculation	
(i)	Percentage of faults cleared within target time = [Total fault reports cleared by target time during the period] x 100/ [Total fault reports cleared during the period]
Definitions	
1)	Clearance is defined as being when all items are available for use by the customer as confirmed by the operator. In determining the clearance time for a fault, no distinction should be made between outage time due to any operator and outage time due to non-acceptance of clearance by a customer.
2)	Target time is the quoted fault clearance time or times offered by the operator for specified maintenance packages. (It may be different for each operator). Where an appointment at the customer premises is required, and a specific appointment is made with the customer then the Target time can be extended past that published only if the customer is unable to attend prior to the target time.
Notes:	
All operators must state in advance of data collection: <ul style="list-style-type: none"> • whether they give appointments in respect of fault and whether they can re-calibrate target times accordingly • their objective time for clearing faults • the items to which this objective time applies (e.g. lines, apparatus, facilities) • how clearance and objective times are to be measured (e.g. if objective time is 10 hours, when does the measurement commence, is the basis of measurement actual or working hours, what is the definition of working hours). <p>Delays attributable solely to the customer in providing access to premises may be discounted from the service restoration time, provided that adequate supporting notes are available to an auditor on an individual basis. As with appointments, this can only be invoked where access to the customer's premises was required.</p>	

III.2.4 Variance from Target Repair Time	
Purpose	This measure demonstrates the spread of late repairs after the promised time.
Applicable Services	The data shall be presented separately for: <ul style="list-style-type: none"> • direct access telephony • indirect access telephony
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Customer fault reports completed by target time in the period plus x hours (by category) To be provided in ranges $x = 1$ hour, 4 hours, 8 hours, 24 hours and > 24 hours
Calculation	
(i)	For all outstanding fault reports after the target time: [Customer fault reports completed by target time in the period plus x hours] X 100/ [Total number of orders completed] (by category) To be presented in ranges $x = 1$ hour, 4 hours, 8 hours, 24 hours and > 24 hours

III.2.5 Response to Fault Reports (leased lines)	
Purpose	To demonstrate the operator's performance in responding adequately to a fault report within the target time promised to customers.
Applicable Services	The data shall be presented separately for analogue and digital leased lines.
Applicable Segments	
(a)	Business customers
Information Provided	
(i)	Fault reports responded to by target time during the period (by category)
(ii)	Total fault reports responded to during the period (by category)
Calculation	
(i)	Percentage of faults responded to within target time = [Fault reports responded to by target time during the period] x 100/ [Total fault reports responded to during the period] (by category)
Definitions	
1)	A response by the operator is defined as when the operator begins to "fix" a fault. This step will take place after initial diagnostics have determined the location and nature of any fault. The time concerned will be determined in working hours from the time at which the fault is reported. The operator shall inform the ODTR of the applicable working hours for this service.

III.2.6 Variance in Response Time (leased lines)	
Purpose	This measure demonstrates the spread of late responses to faults after the promised time.
Applicable Services	The data shall be presented separately for analogue and digital leased lines.
Applicable Segments	
(a)	Business customers
Information Provided	
(i)	Customer fault reports responded to by target time in the period plus x hours (by category) To be provided in ranges $x = 1$ hour, 2 hours, 4 hours, 8 hours and > 8 hours
Calculation	
(i)	For all outstanding fault reports after the target time: [Customer fault reports responded to by target time in the period plus x hours] X 100/ [Total number of fault reports] (by category) To be presented in ranges $x = 1$ hour, 2 hours, 4 hours, 8 hours and > 8 hours

Billing

III.3.1 Billing Accuracy	
Purpose	This measure will be used to ensure that operators are providing customers with accurate bills.
Applicable Services	The data shall be presented separately for: <ul style="list-style-type: none"> • direct access telephony • indirect access telephony.
Applicable Segments	
(a)	Residential customers
(b)	Business customers
Information Provided	
(i)	Number of complaints about the accuracy of bills by category
(ii)	Number of bills issued by category
Calculation	
(i)	Number of billing accuracy complaints per 1000 bills issued = [Number of complaints about the accuracy of bills] X 1000 / [Number of bills issued] by category

Definitions	
1)	A complaint about the accuracy of a bill is not just limited to a query over the amount of a bill, but can include the format, information about the address of the recipient etc. See II.1.1 for the definition of a complaint.
2)	Number of bills issued shall include all first bills to the customer but not repeat bills and reminders. Final statements or initial statements of accounts (for new and old customers respectively) shall be included.
Notes:	
<ul style="list-style-type: none"> • The measure is intended to address the accuracy of information contained within the bill, it is not designed to identify problems with the process of billing. • The inclusion of the complaint is independent of whether or not the complaint is deemed to be justified by the operator. • Complaints about accuracy in respect of credit notes, cheques, final demands etc. should be included. 	

Complaints

III.4.1 Call Statistics for Complaints Handling Line	
Purpose	To measure the ease with which customers are able to make complaints and to ensure that the complaints statistics of the operator are not affected by the customer's ability to make contact with the operator.
Applicable Services	These statistics shall relate to the telephone line(s) which are used for the logging of complaints from customers and members of the public.
Applicable Segments (a)	All
Information Provided	
(i)	Total number of calls to the complaints line
(ii)	Mean time to answer for the period
(iii)	Mean holding time
Calculation	
Information (i), (ii) and (iii) shall be used as reported.	
Definitions	
1)	Time to answer is the time that a caller is left waiting for a customer service agent, from the point where ringing tone is provided to the caller.
2)	Holding time is the time consumed by the customer service agent in completing the transaction with the caller, after the call has been answered.

APPENDIX IV: Supplemental Performance Parameters Applicable to the SMP Operator

Performance towards OLOs

The following table shows which measures for business customers shall be measured separately for OLOs and reported on by the SMP operator.

Table 6 : Performance Measures for Services Provided by the SMP operator to OLOs

Reference	Equivalent parameter for Business Customers	
	Reference	Title
IV.1.1	II.1.1	Number of Registered Complaints
IV.1.2	II.1.2	Number of Registered Complaints Resolved within 20 working days
IV.1.3	II.1.3	Number of Registered Complaints Requiring Dispute Resolution
IV.1.4	III.1.5	Proportion of orders completed on or before the date promised to the customer (carrier services ²⁰)
IV.1.5	III.1.6	Variance from promised delivery date (carrier services)
IV.1.6	III.2.5	Response to Fault Reports (carrier services)
IV.1.7	III.2.6	Variance in Response Time (carrier services)

In addition, the following two measures are required for services provided by a leased line operator with SMP.

IV.1.8 Availability of leased lines	
Purpose	To ensure that the SMP operator is providing adequate performance for this critical service.
Applicable Services	All digital leased lines
Applicable Segments	
(a)	Business customers
(b)	OLOs
Information Provided	<i>Either</i>
(i)	Average of the availability calculated for each circuit (by category)
	<i>or</i>
(ii)	Total out of service time for all circuits (by category) [in hours]
(iii)	Average number of circuits in-service during the period (by category)
Calculation	<i>Either</i>
(i)	Availability of leased lines = information as provided (by category)
	<i>or</i>
(ii)	Availability of leased lines = [Total out of service time for all circuits] / ([Average number of circuits in-service] X 2190 ²¹)

²⁰ Segmented by each “carrier service” within the portfolio of the SMP operator.

²¹ Number of hours in a quarter of a year, 2196 in a leap year.

Definitions	
1)	Availability is defined as [Total number of hours out of service / total number of hours in a reporting period]
2)	Out of service time is the time when a circuit has a fault registered against it by a customer and is not useable by that customer.
3)	Average number of circuits in-service is defined as the number of circuits in service at the start of a reporting period, plus the number in service at the end of a period divided by two.
4)	A circuit is defined as a single dedicated connection between two customer sites.
Notes	
<ul style="list-style-type: none"> • Calculation (i) is preferred. 	

Operator Assistance Services

IV.2.1 Call Statistics for OAS	
Purpose	To measure the responsiveness of the SMP operator's Operator Assistance Service.
Applicable Services	Operator Assistance
Applicable Segments	
(a)	All
Information Provided	
(i)	Total number of calls to OAS
(ii)	Mean time to answer for the period
(iii)	Mean holding time
Calculation	
Information shall be used as reported as (i), (ii) and (iii).	

Directory Enquiries Services

IV.3.1 Call Statistics for DQ	
Purpose	To measure the responsiveness of the SMP operator's Directory Enquiries Service
Applicable Services	Directory Enquiries
Applicable Segments	
(a)	All
Information Provided	
(i)	Total number of calls to DQ
(ii)	Mean time to answer for the period
(iii)	Mean holding time
(iv)	Total number of look-ups performed
(v)	Number of unsuccessful look-ups
Calculation	
	Information shall be used as reported as (i) to (v) plus:
(vi)	Failure rate for DQ look-ups = $[\text{Number of unsuccessful look-ups}] \times 100 / [\text{Total number of look-ups performed}]$
(vii)	Average number of look-ups per DQ call = $[\text{Total number of look-ups performed}] / [\text{Total number of calls to DQ}]$
Definitions	
1)	A look-up is defined as a search for a telephone number after the minimum required information for such a look-up has been provided by the caller.
2)	An unsuccessful look-up is one where the DQ agent is unable to find a number for the caller, based on the minimum set of required information provided.

Public Payphones

IV.4.1 Availability (i.e. in working order) of card and coin operated public pay phones	
Purpose	To ensure that the SMP operator is providing a public card and coin operated payphone service of adequate quality. The measure of quality shall be the availability of the payphones.
Applicable Services	Public card and coin operated payphones
Applicable Segments	
(a)	All
Information Provided	
(i)	Average number of coin or card operated public payphones in-service during the reporting period
(ii)	Proportion of payphones in working order, based on representative surveys and inspections made by the SMP operator.
Calculation	
Information shall be used as reported for (i) and (ii).	
Definitions	
1)	The average number shall be that at the beginning of the reporting period, plus that at the end of the reporting period divided by two.
2)	<p>A public payphone means either coin or card operated telephones and excludes:</p> <ul style="list-style-type: none"> • courtesy telephones, including public telephones which provide only outgoing calls. • public telephones provided by companies other than the SMP operator, such as hotel rooms, businesses who rent pay phones from the SMP operator and offer these to public at their own rates etc. <p>Only public pay phones wholly owned and operated by service providers are to be included in this definition.</p>
Notes	
The SMP operator shall seek approval from the ODTR for the methodology and procedures for its surveys of public payphone availability, before beginning to collect data for this measure.	