

ATTACHMENT C

**BellSouth Telecommunications, Inc.
FPSC Docket No. 960786B-TL & 981834-TP
Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
DISCUSSION OF SPECIFIC ALEC PERFORMANCE MEASUREMENTS DATA
FILED AS ATTACHMENT 1 TO BELLSOUTH'S POST WORKSHOP COMMENTS
ON MARCH 18, 2002 IN FLORIDA DOCKET NOS. 960786B-TL & 981834-TP.**

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DISCUSSION OF SPECIFIC ALEC PERFORMANCE MEASUREMENTS DATA

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**PROPRIETARY DOCUMENT – FILED UNDER
SEAL**

1 **DISCUSSION OF PERFORMANCE MEASUREMENTS DATA**

2
3 **I. INTRODUCTION**

4
5 BellSouth is currently producing state level results based on the January 12,
6 2001, Georgia Order from Docket 7892-U. While there are some differences
7 from the interim Service Quality Measurement (SQM) Version 3.0 approved
8 by this Commission on July 3, 2001, they are minor and should not cause any
9 difficulty in determining BellSouth's overall performance level.

10
11 During the three-month period of September through November 2001, based
12 on ALEC aggregate data, there were a total of 723 sub-metrics that had
13 ALEC activity for all three months and that were compared with either a
14 benchmark or retail analogue. Of those 723 sub-metrics, 612 or 85%
15 satisfied the comparison criteria for a minimum of two of the three months.

16
17 Two general issues can impact the degree to which BellSouth's performance
18 data is meaningful. First, the extreme disaggregation of the data in the
19 reports often dilutes the universe size of individual measurements, which in
20 turn reduces the confidence level of each of the individual Z-test results. As a
21 result, there are many performance measurements for which the results are
22 statistically inconclusive due to the small number of observations. Second, in
23 situations in which there are a large number of observations and the

1 difference between the means is very small, the results can be misleading
2 and not indicative of the absolute level of performance that BellSouth
3 provides to ALECs.

4
5 With respect to the first issue, in many cases, the extensive levels of
6 disaggregation leads to numerous sub-metrics with fewer than 30
7 observations, which is generally accepted as the smallest number of
8 observations for application of the Z-test. Despite this fact, BellSouth has
9 reported results for all of the measures, even those with statistically
10 inconclusive universe sizes.

11
12 The second issue arises in situations where BellSouth provides very high
13 quality service to both BellSouth's retail units and the ALECs, where there are
14 very large universe sizes, and the difference between the means is very
15 small. This scenario can cause an apparent missed condition from a
16 quantitative viewpoint. For example, in November 2001, the % Missed
17 Installation Appointments (%MIA), for Resale Residence / Non-Dispatch / <
18 10 Circuits (A.2.11.1.1.2) showed that BellSouth retail had 0.04% missed
19 appointments for the 669,232 scheduled orders. The ALEC %MIA for the
20 same period is 0.15% missed appointments for 46,311 scheduled orders.
21 While there is very little difference in the results, only eleven one hundredths
22 of a percentage point, the universe is so large that the Z-test becomes overly
23 sensitive to any difference. As a result, the statistical test shows that the sub-

1 metric missed the standard criteria, but BellSouth's actual performance is at a
2 very high level for both the ALECs and BellSouth retail, in this case, greater
3 than 99.8%. From a practical point of view, the ALECs' ability to compete has
4 not been hindered, even though the statistical result does not technically meet
5 the retail analogue.

6
7 In reviewing the data, the Florida Public Service Commission (Commission)
8 should use the data as a tool in analyzing whether BellSouth has met its
9 commitments. It is not a substitute for the qualitative evaluation of
10 BellSouth's performance. The Commission will still need to conduct a
11 qualitative assessment of the data that considers, among other things,
12 universe size, distributional properties of the data, as well as overall
13 performance.

14
15 The various ALEC raised issues in particular measurement areas. The
16 following discussion only addresses these areas of ALEC concern. Each
17 sub-metric designated as having not satisfied the benchmark or BellSouth
18 retail analogue requirement for each ALEC in September, October and/or
19 November 2001 is included in this Attachment. Each sub-metric discussed is
20 labeled as being missed in any one or more of the months
21 (September/October/November) included in this filing.

22

1
2 **II. ANALYSIS OF INDIVIDUAL ALEC PERFORMANCE MEASUREMENTS**

3
4 It is important to note that the following data is based only on measurements
5 for which ALECs raised performance issues, directly or indirectly, either in
6 filed comments or during the February 18, 2001 Workshop. Therefore, the
7 overall performance results for the specific ALECs identified in the following
8 analysis is not included. BellSouth's overall performance for the ALEC
9 aggregate, as previously discussed in the introduction, provides a more
10 complete and representative view of the level of service provided to Florida
11 ALEC's.

12
13 BellSouth is currently producing state level results based on the January 12,
14 2001, Georgia Order from Docket 7892-U. As discussed earlier, there are
15 some differences from the interim Service Quality Measurement (SQM)
16 Version 3.0 approved by this Commission on July 3, 2001 but these
17 differences are minor and should not cause any difficulty in determining
18 BellSouth's overall performance level. For each of the ALECs raising
19 performance issues in the February 18, 2002 workshop, the following data
20 shows criteria not satisfied in the performance measurements categories
21 addressed by the ALEC filings. The months in parenthesis represent the
22 months in which the retail analog or benchmark comparison criteria were not
23 satisfied.

1 UNE Digital Loop >= DS1 (September/October/November)

2 The difference between the retail analogue and the KMC trouble report rates
3 for September through November 2001 was less than 2.8%. Both KMC and
4 BellSouth retail experienced greater than 96% trouble free service for all in
5 service lines in this sub-metric for these three months.

6

7 **4. Maintenance Average Duration**

8

9 UNE Digital Loop >= DS1 / Dispatch (October)

10 The difference between the retail analogue and the KMC average repair time
11 for October 2001 is less than 8 minutes. BellSouth exceeded the retail
12 analogue comparison criteria for KMC for this sub-metric in September and
13 November 2001.

14

15 **B. Network Telephone**

16

17 **1. Customer Trouble Report Rate / Dispatch**

18

19 Resale Business (September/October/November)

20 The difference between the retail analogue and the Network Telephone
21 trouble report rate did not exceed 0.32% in any of the three months,
22 September, October and November 2001. Both Network Telephone and

1 BellSouth retail experienced greater than 98% trouble free service for all in
2 service lines in this sub-metric.

3

4 Resale PBX (September/October/November)

5 The differences between the retail analogue and the Network Telephone
6 trouble report rates for September, October and November 2001 were 7.93%,
7 1.94% and 0.17% respectively. As is apparent, the results for this sub-metric
8 improved significantly from September to November. In October and
9 November 2001, both Network Telephone and BellSouth retail experienced
10 greater than 98% trouble free service for all lines in service in this sub-metric.

11

12 Resale ISDN (November)

13 The difference between the retail analogue and the Network Telephone
14 trouble report rate for November 2001 is less than 0.4%. Both Network
15 Telephone and BellSouth retail experienced greater than 99% trouble free
16 service for all in service lines in this sub-metric. BellSouth exceeded the retail
17 analogue comparison criteria for this sub-metric for Network Telephone in
18 September and October 2001.

19

20 2W Analog Loop Design (October)

21 The difference between the retail analogue and the Network Telephone
22 trouble report rate for October 2001 is about 0.06%. Both Network Telephone
23 and BellSouth retail experienced greater than 99.9% trouble free service for

1 all in service lines in this sub-metric. BellSouth exceeded the retail analogue
2 comparison criteria for this sub-metric for Network Telephone in September
3 and November 2001.

4

5 UNE xDSL(October)

6 The difference between the retail analogue and the Network Telephone
7 trouble report rate for October 2001 is about 0.74%. Both Network Telephone
8 and BellSouth retail experienced greater than 99% trouble free service for all
9 in service lines in this sub-metric. BellSouth exceeded the retail analogue
10 comparison criteria for this sub-metric for Network Telephone in September
11 and November 2001.

12

13 UNE ISDN (October/November)

14 The difference between the retail analogue and the Network Telephone
15 trouble report rate for October 2001 is less than about 2%. Both Network
16 Telephone and BellSouth retail experienced greater than 97% trouble free
17 service for all in service lines in this sub-metric in both October and
18 November 2001. BellSouth exceeded the retail analogue comparison criteria
19 for this sub-metric for Network Telephone in September 2001.

20

21 **2. Customer Trouble Report Rate / Non-Dispatch**

22

23 Resale Business (October/November)

1 For Network Telephone, there were 15 troubles reported for the 869 lines in
2 service (1.73%) in October and 10 troubles reported for the 306 lines in
3 service (3.27%) in November 2001. The difference between the retail
4 analogue and the Network Telephone trouble report rate is less than 1% for
5 October and about 2.5% for November 2001. BellSouth exceeded the retail
6 analogue comparison criteria for this sub-metric for Network Telephone in
7 September 2001.

8

9 Resale Design (September)

10 The difference between the retail analogue and the Network Telephone
11 trouble report rate is about 0.05% for September 2001. BellSouth exceeded
12 the retail analogue comparison criteria for this sub-metric for Network
13 Telephone in October and November 2001.

14

15 Resale ISDN (September/October)

16 The difference between the retail analogue and the Network Telephone
17 trouble report rate is less than 2.2% for September and less than 0.3% for
18 October 2001. BellSouth exceeded the retail analogue comparison criteria for
19 this sub-metric for Network Telephone in November 2001.

20

21 UNE ISDN (September)

22 The difference between the retail analogue and the Network Telephone
23 trouble report rate is about 1.24% for September 2001. BellSouth exceeded

1 the retail analogue comparison criteria for this sub-metric for Network
2 Telephone in October and November 2001.

3

4 **3. Maintenance Average Duration / Dispatch**

5

6 **Resale Business (October)**

7 The difference between the retail analogue and the Network Telephone
8 average repair interval is about 8.18 hours for October 2001. BellSouth
9 exceeded the retail analogue comparison criteria for this sub-metric for
10 Network Telephone in September and November 2001.

11

12 **Resale Design (November)**

13 There was only one trouble report for this sub-metric for Network Telephone
14 in November 2001. The small universe of trouble reports for this sub-metric
15 does not provide a statistically conclusive comparison to the retail analogue.
16 BellSouth exceeded the retail analogue comparison criteria for this sub-metric
17 in September and October 2001.

18

19 **Resale PBX (October)**

20 There were only seven troubles for this sub-metric for Network Telephone in
21 October 2001. The small universe for this sub-metric does not provide a
22 statistically conclusive comparison to the retail analogue. BellSouth met the
23 retail analogue for this sub-metric in September and November 2001.

1

2 Resale ISDN (November)

3 There was only one trouble report for this sub-metric for Network Telephone
4 in November 2001. The small universe of trouble reports for this sub-metric
5 does not provide a statistically conclusive comparison to the retail analogue.
6 BellSouth exceeded the retail analogue comparison criteria for this sub-metric
7 in September and October 2001.

8

9 UNE ISDN (September/October)

10 The difference between the retail analogue and the Network Telephone
11 average repair time is less than one hour for September and less than ten
12 minutes for October 2001. BellSouth exceeded the retail analogue
13 comparison criteria for this sub-metric for Network Telephone in November
14 2001.

15

16 **C. COVAD**

17

18 **1. Percent Missed Installation Appointments / Dispatch**

19

20 UNE ISDN (September/October/November)

21 While the difference between the retail analogue and the percent missed
22 appointments for Covad was about 5.9% in September, the difference
23 decreased to about 1.1% in October and about 0.9% in November 2001.

1

2 UNE Line Sharing (October)

3 There were only six orders for this sub-metric for Covad in October 2001.
4 The small universe of orders for this sub-metric does not provide a statistically
5 conclusive comparison to the retail analogue. BellSouth exceeded the retail
6 analogue comparison criteria for this sub-metric for Covad in September and
7 November 2001.

8

9 **2. Average Completion Interval / Non-Dispatch**

10

11 UNE Line Sharing (September/October/November)

12 The completion interval difference between the Covad result and the result for
13 the BellSouth retail analogue for this sub-metric was 0.56 days for September
14 and 0.3 days for October 2001. While the difference between the retail
15 analogue and Covad result was 1.26 days for November 2001, there were
16 only five Covad orders for that month. The small universe of orders for this
17 sub-metric in November 2001 does not provide a statistically conclusive
18 comparison to the retail analogue.

19

20 **3. Percent Provisioning Troubles w/l 30 Days / Dispatch**

21

22 UNE ISDN (September/October/November)

1 There were 11 troubles reported for the 192 orders (5.73%) that completed in
2 the 30 days prior to September 2001, 15 troubles reported for the 153 orders
3 (9.80%) completed in the 30 days prior to October and 4 troubles reported for
4 the 130 orders (3.08%) completed in the 30 days prior to November 2001 for
5 this sub-metric for Covad. There was less than a 1% difference between the
6 retail analogue and the Covad results for September and November 2001.

7

8 UNE Line Sharing (September/October/November)

9 There were 2 troubles reported for the 8 orders that completed in the 30 days
10 prior to September 2001, 3 troubles reported for the 15 orders completed in
11 the 30 days prior to October and 3 troubles reported for the 6 orders
12 completed in the 30 days prior to November 2001 for this sub-metric for
13 Covad. The small universe of orders for this sub-metric does not provide a
14 statistically conclusive comparison to the retail analogue.

15

16 4. Percent Provisioning Troubles w/ 30 Days / Non-Dispatch

17

18 UNE Line Sharing (September/October/November)

19 There were 25 troubles reported for the 121 orders that completed in the 30
20 days prior to September, 16 troubles reported for the 73 orders completed in
21 the 30 days prior to October and 6 troubles reported for the 19 orders
22 completed in the 30 days prior to November 2001 for this sub-metric for
23 Covad.

1

2 **5. Customer Trouble Report Rate / Dispatch**

3

4 **UNE ISDN (September/October/November)**

5 The difference between the retail analogue and the Covad trouble report rate
6 was less than 1.1% for all three months (September, October and November
7 2001). Both the Covad and BellSouth retail experienced greater than 97%
8 trouble free service for all in service lines in this sub-metric in all three
9 months.

10

11 **UNE xDSL (September/October)**

12 The difference between the retail analogue and the Covad trouble report rate
13 was less than 0.6% for September and October 2001. Both Covad and
14 BellSouth retail experienced greater than 97% trouble free service for all in
15 service lines in this sub-metric for Covad in September and October 2001.
16 BellSouth exceeded the retail analogue comparison criteria for this sub-metric
17 for Covad in November 2001.

18

19 **UNE Line Sharing (September/November)**

20 The difference between the retail analogue and the Covad trouble report rate
21 ranges from 0.16% to 0.63% for September and November 2001 respectively.
22 Both Covad and BellSouth retail experienced greater than 98% trouble free
23 service for all in service lines in this sub-metric in September and November

1 2001. BellSouth exceeded the retail analogue comparison criteria for this
2 sub-metric for Covad in October 2001.

3

4 **6. Customer Trouble Report Rate / Non-Dispatch**

5

6 **UNE ISDN (October)**

7 The difference between the retail analogue and the Covad trouble report rate
8 was about 0.03% for October 2001. Both Covad and BellSouth retail
9 experienced greater than 98% trouble free service for all in service lines in
10 this sub-metric in October 2001. BellSouth exceeded the retail analogue
11 comparison criteria for this sub-metric for Covad in September and November
12 2001.

13

14 **UNE Line Sharing (September/November)**

15 The difference between the retail analogue and the Covad trouble report rate
16 ranges from a high of 1.94 % to a low of 0.32% over the three-month period
17 (September, October and November 2001). Both Covad and BellSouth retail
18 experienced greater than 96.6% trouble free service for all in service lines in
19 this sub-metric in all three months.

20

21 **7. Maintenance Average Duration / Non-Dispatch**

22

23 **UNE ISDN (October/November)**

1 The difference between the retail analogue and the Covad average repair
2 time is 0.62 hours for October and 1.64 hours for November 2001. BellSouth
3 exceeded the retail analogue comparison criteria for this sub-metric for Covad
4 in September 2001.

5

6 UNE Line Sharing (September/October/November)

7 The difference between the retail analogue and the Covad average repair
8 time was about 6.98 hours in September, 2.15 hours in October and 1.52
9 hours in November 2001. BellSouth exceeded the retail analogue
10 comparison criteria for the ALEC aggregate in all three months (September,
11 October and November 2001).

12

13 8. Percent Repeat Troubles w/ 30 Days / Dispatch

14

15 UNE ISDN (September/November)

16 The difference between the retail analogue and the repeat trouble rate for
17 Covad is 0.32% in September and 1.78% in November 2001. BellSouth
18 exceeded the retail analogue comparison criteria for this sub-metric for Covad
19 in October 2001.

20

21 9. Percent Repeat Troubles w/ 30 Days / Non-Dispatch

22

23 UNE Line Sharing (September)

1 There were 11 repeat troubles of 20 total trouble reports for Covad for this
2 sub-metric in September 2001. While the difference between the retail
3 analogue and the Covad result was 14.92% in September, BellSouth
4 exceeded the retail analogue comparison for this sub-metric in October and
5 November 2001.

6

7

D. Florida Digital Network (FDN)

8

9

1. Order Completion Interval / Dispatch

10

11

2W Analog Loop Non-Design (September/October/November)

12

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17

2W Analog Loop Non-Design w/LNP (September/October/November)

18

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21

22

23

The difference between the retail analogue and the average completion interval for FDN for this sub-metric was 0.36 days in September, 1.06 days in October and 0.71 days in November 2001. The difference of less than 1 day on average does not hinder an ALECs' ability to compete in this area.

The difference between the retail analogue and the average completion interval for FDN for this sub-metric was 0.47 days for September, 0.95 days for October and 1.55 days for November 2001. Two out of three months, reflect a difference of less than one day and the third month is about one and one-half day. These differences do not hinder an ALEC's ability to compete in this area.

1

2 2W Analog Loop Design (September/October/November)

3 The difference between the retail analogue and the average completion
4 interval for FDN was 0.80 days in September, 3.37 days in October and 1.44
5 days in November 2001. Analysis of this sub-metric and other related sub-
6 metrics, in general, based on aggregate level data, indicates that a significant
7 number of orders with customer requested extended intervals were not "L
8 coded" and should have been excluded from the measurement. The
9 inclusion of such orders improperly extends the ALEC average interval.

10

11 2W Analog Loop Design w/LNP (September/October/November)

12 The difference between the retail analogue and the average completion
13 interval for FDN was 1.63 days in September, 1.39 days in October and 1.13
14 days for November 2001. Analysis of this sub-metric and other related sub-
15 metrics, in general, based on aggregate level data, indicates that a significant
16 number of orders with customer requested extended intervals were not "L
17 coded" and should have been excluded from the measurement. The
18 inclusion of such orders improperly extends the ALEC average interval.

19

20 UNE Digital Loop < DS1 (October/November)

21 The difference between the retail analogue and the average completion
22 interval for FDN was 1.79 days in October and 4.51 days in November 2001.
23 Analysis of aggregate level data for this sub-metric and other related sub-

1 metrics, in general, indicates that a significant number of orders with
2 customer requested extended intervals were not "L coded" and should have
3 been excluded from the measurement. The inclusion of such orders
4 improperly extends the ALEC average interval. BellSouth exceeded the retail
5 analogue comparison criteria for this sub-metric for FDN in September 2001.
6 BellSouth also exceeded the retail analogue comparison for the ALEC
7 aggregate in September and October 2001.

8

9 UNE Other Non-Design (September/October)

10 The difference between the retail analogue and the average completion
11 interval for FDN was 0.7 days in September and 0.57 days in October 2001.
12 The difference of less than 1 day for this sub-metric does not hinder an
13 ALECs' ability to compete in this area. BellSouth exceeded the retail
14 analogue comparison criteria for this sub-metric for FDN in November 2001.
15 BellSouth also exceeded the retail analogue comparison for the ALEC
16 aggregate in September and November 2001.

17

18 **2. Percent Missed Installation Appointments / Dispatch**

19

20 2W Analog Loop Non-Design (October)

21 While the retail analog comparison for this sub-metric was not satisfied in
22 October 2001 for FDN, BellSouth met 104 of the 112 appointments (92.9%)
23 scheduled for FDN during the month. BellSouth exceeded the retail analogue

1 comparison criteria for this sub-metric for FDN in September and November
2 2001.

3

4 2W Analog Loop Design (October)

5 The difference between the retail analogue and the FDN result for this sub-
6 metric was 1.28% for October 2001 with BellSouth meeting 36 of the 38
7 appointments scheduled for the month. BellSouth exceeded the retail
8 analogue comparison for this sub-metric for FDN in September and
9 November 2001.

10

11 UNE Digital Loop >=DS1 (October/November)

12 While the retail analogue comparison for this sub-metric was not satisfied for
13 FDN in October and November 2001, BellSouth met 29 of the 32
14 appointments (90.6%) scheduled in October and 15 of the 16 appointments
15 (93.8%) scheduled in November 2001. BellSouth exceeded the retail
16 analogue comparison criteria for this sub-metric in September 2001.

17

18 UNE Other Non-Design (October)

19 The difference between the retail analogue and the FDN result for this sub-
20 metric was only 0.63% in October 2001. BellSouth exceeded the retail
21 analogue comparison criteria for September and November 2001.

22

23 3. Customer Trouble Report Rate / Dispatch

1

2 UNE Digital Loop >=DS1 (September/October/November)

3 There were 6 troubles reported for the 181 lines in service in September, 11
4 troubles reported for the 188 lines in service in October and 10 troubles
5 reported for the 211 lines in service in November 2001 for FDN. The
6 difference between the retail analogue and the FDN trouble report rate
7 ranged from 2.89% to 5.45% during this three-month period.

8

9 UNE ISDN (September/October/November)

10 The difference between the retail analogue and the FDN trouble report rate is
11 less than 1.6% for September through November 2001. Both FDN and
12 BellSouth retail experienced greater than 97% trouble free service for all in
13 service lines in this sub-metric during the three-month period.

14

15 UNE Other Design (September /October/November)

16 The difference between the retail analogue and the FDN trouble report rate is
17 less than 0.6% for September through November 2001. Both FDN and
18 BellSouth retail experienced greater than 99% trouble free service for all in
19 service lines in this sub-metric during the three-month period.

20

21 **4. Customer Trouble Report Rate / Non-Dispatch**

22

23 UNE Digital Loop >=DS1 (September/October/November)

1 The difference between the retail analogue and the FDN trouble report rate
2 ranged from 0.67% to 3.28% for September through November 2001. Both
3 FDN and BellSouth retail experienced greater than 96% trouble free service
4 for all in service lines in this sub-metric during the three-month period.

5

6 UNE ISDN (November)

7 The difference between the retail analogue and the FDN trouble report rate
8 for November 2001 is only 0.05%. Both FDN and BellSouth retail
9 experienced 99% or greater trouble free service for all in service lines in this
10 sub-metric in November 2001. BellSouth exceeded the retail analogue
11 comparison criteria for this sub-metric for FDN in September and November
12 2001.

13

14 UNE Other Design (September)

15 The difference between the retail analogue and the FDN trouble report rate
16 for November 2001 is only 0.07%. Both FDN and BellSouth retail
17 experienced greater than 99% trouble free service for all in service lines in
18 this sub-metric in September 2001. BellSouth exceeded the retail analogue
19 comparison criteria for this sub-metric for FDN in October and November
20 2001.

21

22 5. Maintenance Average Duration / Dispatch

23

1 UNE Digital Loop >=DS1 (September)

2 The difference between the retail analogue and the FDN average repair time
3 is 2.92 hours for September 2001. BellSouth exceeded the retail analogue
4 comparison criteria for this sub-metric for FDN in October and November
5 2001.

6

7 **6. Maintenance Average Duration / Non-Dispatch**

8

9 2W Analog Loop Non-Design (September/November)

10 The difference between the retail analogue and the FDN average repair time
11 is 1.77 hours for September and 0.57 hours for November 2001. BellSouth
12 exceeded the retail analogue comparison criteria for this sub-metric for FDN
13 in October 2001.

14

15 UNE ISDN (September/October/November)

16 There were only nine FDN troubles reported for this sub-metric in September
17 and nine FDN troubles reported for October 2001 as well. The small universe
18 of occurrences for this sub-metric does not provide a statistically conclusive
19 comparison to the retail analogue. The difference between the retail
20 analogue and the FDN average time to repair is 2.17 hours for September,
21 0.5 hours for October and 1.71 hours for November 2001.

22

23 UNE Other Design (September)

1 There were only two trouble reports for FDN in September 2001. The small
2 universe of occurrences for this sub-metric does not provide a statistically
3 conclusive comparison to the retail analogue. BellSouth exceeded the retail
4 analogue comparison criteria for this sub-metric for FDN in October and
5 November 2001.

6

7 **III. Summary**

8

9 There are several points that need to be made in summarizing the analysis
10 contained in this attachment. First, the data included in this document is limited
11 to the performance areas in which specific ALECs raised issues. Secondly, while
12 the data analysis provided in this attachment only addresses sub-metric results
13 that did not satisfy established benchmarks or retail analogue comparison
14 criteria, it does not summarize the overall performance results for each ALEC
15 individually.

16

17 Thirdly, where BellSouth did not meet the retail analogue comparison criteria for
18 the specific ALECs included, the vast majority of cases involve: (1) a small
19 universe size, which does not provide a statistically conclusive comparison to the
20 retail analogue, (2) the difference between the individual ALEC result and the
21 retail analogue result is not significant, or (3) BellSouth is providing a high level of
22 service to both the ALECs and retail customers alike.

23

1 Finally, it is important to reiterate that during the three-month period of
2 September through November 2001, based on ALEC aggregate data, there were
3 a total of 723 sub-metrics that had ALEC activity for all three months and that
4 were compared with either a benchmark or retail analogue. Of those 723 sub-
5 metrics, 612 or 85% satisfied the comparison criteria for a minimum of two of the
6 three months. This aggregate data provides a broader perspective of BellSouth's
7 actual performance in Florida.

8

9

10

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