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COMMISSION
CLERK

April 2, 2010

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 000121A-TP**
In Re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange Telecommunications companies (BellSouth Track)

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to Questions from the Florida Competitive Carriers Association.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Tracy W. Hatch

Enclosures

cc: All parties of record
    Jerry D. Hendrix
    Gregory R. Follensbee
    E. Earl Edenfield, Jr.

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ECR ___
GCL _2_
RAD ___
SSC ___
ADM ___
OPC ___
CLK ___

DOCUMENT NUMBER-DATE

02460 APR-2 ≗

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail this 2nd day of April, 2010 to the following:

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Tracy W. Hatch

(+) Signed Protective Agreement

AT&T Florida
FL PSC Docket No. 000121A-TP
Responses to March 25, 2010
Notice for Comments
April 2, 2010
Item No. 1
Page 1 of 2

REQUEST: AT&T and CompSouth stated on the March 24, 2010 conference call with Staff that their agreement embodied all of the agreements made by all parties through the workshop process. Please provide us with a matrix that shows the areas of agreement you believe were reached as of the final day of the December 16, 2009 Commission workshop.

RESPONSE: See the attached matrix for the Proposed Florida SQM Plan and the attached matrix for the Proposed Florida SEEM Plan. These matrices have been updated from the matrices jointly filed in the docket on October 30, 2009 by AT&T and all CLECs participating in the Florida SQM/SEEM Review workshops. AT&T has made annotations in the far right hand column of each matrix as to AT&T's understanding of agreements reached as of the final day of the December 16/17, 2009 Commission workshop. All AT&T annotations are distinguishable through blue highlighting as well as a different font size and color, and use of italics.

AT&T Florida
FL PSC Docket No. 000121A-TP
Responses to March 25, 2010
Notice for Comments
April 2, 2010
Item No. 2
Page 1 of 1

REQUEST: What are the benefits to a) AT&T; b) CompSouth, and c) the State of Florida that
            would result from doing away with Tier II penalties?

RESPONSE: As AT&T stated in its previous filings, times have changed since Tier II SEEM
            remedies were first instituted. Tier II remedies were thought necessary to provide
            additional financial incentives to establish and maintain an open, competitive
            marketplace, and prevent backsliding. Their purpose has been fulfilled -- the
            telecommunications marketplace is now irreversibly open to competition. The
            rest of AT&T's ILEC footprint has evolved its remedy plan; the Southeast region
            is the only region in AT&T's 22-state ILEC footprint that still has Tier II
            remedies. Also, in addition to being punitive, Tier II remedies are discriminatory
            as AT&T is the only ILEC in Florida subject to SEEM payments; Verizon and
            Embarq are not. See, Docket No. 000-121A-TP: *BellSouth Telecommunications,
            Inc.'s Comments and Proposed Revisions to the BellSouth Performance
            Assessment Plan*, filed July 10, 2009; and, AT&T's *Motion for Expedited
            Approval of Lifeline Outreach Funding and for Modification of SEEM Penalty
            Payments*, filed October 16, 2009.

AT&T Florida
FL PSC Docket No. 000121A-TP
Responses to March 25, 2010
Notice for Comments
April 2, 2010
Item No. 3
Page 1 of 1

REQUEST: What is the rationale for doing away with Tier II? What is the rationale for
increasing penalties for Tier I by 20 percent?

RESPONSE: Please see AT&T's response to Question 2. The change in the Tier I fee schedule
represents a negotiated compromise in consideration of the elimination of Tier II
remedies. AT&T agreed to place additional SEEM remedy dollars at risk to
demonstrate its commitment to performance and as a deterrent to backsliding.
Specifically, AT&T agreed to increase the Tier I Fee Schedule by twenty (20)
percent on an individual remedied metric basis (except for Collocation and
Billing), commencing with the third consecutive month miss and continuing
through the sixth consecutive month miss. This revision is similar in structure to
the methodology employed by Tier II remedies in that AT&T will be subject to
increased remedies when non-equity performance is incurred for three
consecutive months or more. A major difference to the Tier II methodology,
however, is this increased rate in the Tier I remedy will be applied at the
individual CLEC performance level (versus the aggregate performance across all
CLECs) and the resulting remedies will be paid to the CLEC.

Proposed Florida SQM Plan

AT&T and CLECs Joint Matrix

04-02-10 Update reflects AT&T's understanding of agreements reached as of the final day of the December 16-17, 2009 Commission workshop

Initial Filing 10-30-2009 / Updated 04-02-2010

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Introduction	~~BellSouth~~AT&T Service Quality Measurement (SQM) Plan ~~(SQM)~~ describes in detail the measurements produced to evaluate the quality of service delivered to ~~BellSouth~~AT&T's wholesale customers. The SQM was developed to respond to the requirements of the Communications Act of 1996 Section 251 (96 Act) which required ~~BellSouth~~AT&T to provide non-discriminatory access to Competitive Local Exchange Carriers (CLEC)[1]. The reports produced by the SQM provide regulators, CLECs and ~~BellSouth~~AT&T the information necessary to monitor the delivery of non-discriminatory access. This plan results from the many divergent forces evolving from the 96 Act. This specific SQM is based on Order No. ~~PSC-07-0286-PAA-TP~~ TBD issued by the Florida Public Service Commission (FPSC) on ~~April 3, 2007~~ TBD in Docket No. 000121A-TP~~, and as confirmed by Consummating Order No. PSC-07-0395-CO-TP, issued by the FPSC on May 7, 2007 and modifications resulting from the implementation of OSS architecture changes on April 19, 2008.~~ Rationale: • Throughout the SQM document an administrative change is made changing BellSouth to AT&T. • Administrative change that will be made to reflect order and date of order to be issued at close of the review.		**Parties Agree.**
Report Publication Dates	Each month, preliminary SQM reports will be posted to ~~BellSouth's PMAP~~ AT&T's performance measurement website ~~(http://pmap.bellsouth.com)~~by 8:00 AM EST on the 21st day of each month or the first business day after the 21st. The reports will contain information collected in each performance category and will be available to CLEC via the AT&T website. AT&T will also provide electronic access to the raw data underlying the SQM subject to the retention period. ~~The~~Final validated SQM reports will be posted by 8:00 AM on the last day of the		**Parties Agree:** **AT&T agrees to keep the URL reference on this page and references as "AT&T performance**

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	month or the first business day after the last day of the month. ~~For details on SEEM, please refer to the SEEM Administrative Plan.~~ ~~BellSouth~~ AT&T shall retain the performance measurement Supporting Data Files (SDF) for a period of 18 months and further retain the monthly reports ~~produced in PMAP~~ for a period of three years. Instructions for replicating the reports in the SQM are contained in the Supporting Data User Manual (SDUM). The SDUM is available on the ~~PMAP~~ performance measurement AT&T website and is automatically provided with each SDF download. Rationale: • Remove all references to PMAP to allow flexibility in the event platform changes in the future. • Insert verbiage from SEEM Plan that further describes Performance report availability • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.		**measurement website" on all other pages where this URL applies.**
Report Delivery Methods	CLEC SQM ~~and SEEM~~ reports will be considered delivered when posted to the AT&T performance measurement website. The State/Federal Commissions have been given access to the website. Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.		**Parties Agree.**
Change of Law	Upon a particular Commission's issuance of an Order pertaining to the Service Quality Measurement (SQM) Plan in a proceeding expressly applicable to all CLECs, AT&T shall implement such plan covering its performance for the CLECs, as well as any changes to that plan ordered by the Commission, on the date specified by the Commission. If a change of law occurs which may change AT&T's obligations, parties may petition the Commission within 30 days to seek changes to the SQM Plan in accordance with such change of law. Performance measurements that have been ordered by the Commission can currently be accessed via the AT&T websiteError! Hyperlink reference not valid.. Should there be any difference between the SQM Plan on AT&T's website and the plan the Commission has approved as filed in compliance with its orders, the Commission-approved compliance plan will supersede as of its effective date.		**Parties Agree.**

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: • Inserted verbiage from SEEM Plan for Change of Law application within the Performance Plan		
Adimnistrative Changes	A workshop and/or conference shall be organized and held periodically for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative. AT&T may make administrative changes that do not substantively change the SQM Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes. Rationale: • Proposing change annual review to periodic, as needed. • Provide language to modify the SQM plan for administrative changes that do not substantively change the plan to simplify administration of the plan and ensure documentation that is compliant at all times with existing OSS systems and processes.		**Area for further negotiations by parties.** **Noted below is the Plan language currently under negotiation by the parties.** A workshop and/or conference shall be organized and held periodically or at the request of either party for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative. AT&T may make administrative changes that do not substantively change the SQM Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes. An administrative change is one that corrects typographical, spelling, grammatical, or computational errors, updates website addresses and incorporates modifications to architecture implemented in an OSS release following the approved Change Management process. Administrative changes will not change the intent or the plan language of the document. *As a result of discussions during the workshops, AT&T agreed to distinguish between the Review of Measurements and Administrative Changes in the above language under negotiation.*

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Contents	**Section 1: Operations Support Systems (OSS)** OSS-1 [ARI]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)........................ OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)..................... PO-2 [LMT]: Loop Makeup - Response Time - Electronic............... **Section 2: Ordering** ~~O-2 [AKC]: Acknowledgement Message Completeness.................~~ O-3 [FT]: Percent Flow-Through Service Requests........................... O-8 [RI]: Reject Interval .... O-9 [FOCT]: Firm Order Confirmation Timeliness .... ~~O-11 [FOCC]: Firm Order Confirmation and Reject Response Completeness 15~~ O-12 [OAAT]: Average Answer Time - Ordering Centers .... **Section 3: Provisioning** P-1 [HOI]: Held Order Interval .... P-2A [PJ48]: Percentage of Orders Given Jeopardy Notices >= 48 Hours ~~20~~18 P-2B [PJ]: Percentage of Orders Given Jeopardy Notices.................... P-3 [MIA]: Percent Missed Installation Appointments................. P-4 [OCI]: Order Completion Interval (OCI)........................... P-5 [CNI]: Average Completion Notice Interval................................. P-7 [CCI]: Coordinated Customer Conversions– Hot Cut Duration ~~30~~27 P-7A [CCT]: Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval................ ~~P-7B [CCRT]: Coordinated Customer Conversions – Average Recovery Time 32~~ ~~P-7C [CPT]: Hot Cut Conversions – Percent Provisioning Troubles Received within 5 Days of a Completed Service Order................~~ P-7D [NCDD]: Non-Coordinated Customer Conversions – Percent Completed and Notified on Due Date	NEW Average Time Required to Update 911 Database (Facility Based Providers) NEW Percent 911 Database Accuracy	**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	P-9 [PPT]: Percent Provisioning Troubles within "X" Days of Service Order Completion.. P-11 [SOA]: Service Order-Accuracy .... P-13B [LOOS]: LNP-Percent Out of Service < 60 Minutes .... ~~P-13C [LAT]: LNP-Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date.............................~~ P-13D [LDT]: LNP-Disconnect Timeliness (Non-Trigger)............... **Section 4: Maintenance & Repair** M&R-1 [MRA]: Percent Missed Repair Appointments ....~~42~~35 M&R-2 [CTRR]: Customer Trouble Report Rate Net of Provisioning Trouble and Repeat Reports....................~~44~~37 M&R-3 [MAD]: Maintenance Average Duration..............~~46~~39 M&R-4 [PRT]: Percent Repeat Customer Troubles within 30 Calendar Days ....~~48~~41 M&R-5 [OOS]: Out of Service (OOS) > 24 Clock Hours....~~50~~43 M&R-6 [MAAT]: Average Answer Time – Repair Centers...~~52~~45 ~~**Section 5: Billing**~~ ~~B-1 [BIA]: Invoice Accuracy.....53~~ ~~B-2 [BIT]: Mean Time to Deliver Invoices......54~~ ~~B-5 [BUDT]: Usage Data Delivery Timeliness....55~~ ~~B-10 [BEC]: Percent Billing Adjustment Requests (BAR) Responded to within 40 Business Days...........56~~	NEW 911- Average Time to Clear Errors NEW Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs NEW Directory Assistance- Database Update Accuracy NEW Percentage of Electronic Updates that Flow Through the DSR process Without Manual Intervention	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Section 6: Trunk Group Performance TGP-1 [TGP]: Trunk Group Performance..................~~57~~46 **Section 7: Collocation** ~~C-1 [ART]: Collocation Average Response Time..............59~~ ~~C-2 [AT]: Collocation Average Arrangement Time.........60~~ C-3 [MDD]: Collocation Percent of Due Dates Missed.......~~61~~48 **Section 8: Change Management** ~~CM-1 [NT]: Timeliness of Change Management Notices....62~~ ~~CM-3 [DT]: Timeliness of Documentation Associated with Change.63~~ ~~CM-5 [ION] Notification of CLEC Interface Outages.......64~~ CM-6 [SEC]: Percentage of Software Errors Corrected in "X" Business Days ....~~65~~49 ~~CM-7 [CRA]: Percentage of Change Requests Accepted or Rejected within 10 Business Days..............................66~~ ~~CM-8 [CRR]: Percent Change Requests Rejected..............67~~ ~~CM-9 [NDPR]: Number of Defects in Production Releases (Type 6 CR)...68~~ ~~CM-10 [SV]: Software Validation.......................................69~~ ~~CM-11 [SCRI]: Percentage of Software Change Requests Implemented within 60 Weeks of Prioritization......................70~~ ~~CM-11A [PCRI]: Average Time to Implement Process Change Requests...71~~ Rationale: Refer to individual Metric and Appendix for rationale.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Appendix <u>A</u>: Glossary of Acronyms and Terms..~~72~~50 Appendix <u>B</u>: ~~BellSouth~~AT&T Audit and Dispute Resolution Policy ....~~82~~60 Appendix <u>C</u>: OSS Interface Table ....~~83~~61 Appendix D: AT&T~~BellSouth~~'s Policy on Reposting of Performance Data ~~and Recalculation of SEEM Payments~~.. ....~~86~~64 Appendix E: Description of Raw Data and Other Supporting Data Files..........~~88~~66 ~~Appendix F: BellSouth PMAP Data Notification Process............................. ....91~~ Appendix <u>G</u>F: SQM Equity Determination..~~92~~69 ~~Appendix H: Special Access Measurements...................................93~~ Rationale: • Refer to individual Metric and Appendix for rationale.		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Operations Support Systems (OSS)	
OSS-1	ARI	OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)		

Exclusions		**Exclusions** • Syntactically Incorrect queries • Scheduled OSS Maintenance • Test Transactions/Records ☐ BellSouth may exclude transactions submitted by an individual CLEC that are an unanticipated significant increase in the monthly volume of transactions submitted by that individual CLEC. This exclusion will only be applied when the individual CLEC's transactions are directly attributable to a failure of the SQM measure. An unanticipated, significant increase in CLEC volume is indicated by either a 100% increase over the individual CLEC's forecasted volumes or over the average of the normalized volumes for the most recent prior six months. BellSouth will notify the individual CLEC whose transactions caused this exclusion to be invoked, and will provide general notification to CLECs that such transactions were excluded. ☐	**Area to be subject of PSC Workshop and ultimately staff recommendation.**

Business Rules	OSS **Response** Interval is designed to monitor the time required for the CLEC and ~~BellSouth~~AT&T interface systems to obtain, from ~~BellSouth's~~AT&T's legacy systems, the information required to handle Pre-Ordering/Ordering/Maintenance and Repair functions. The clock starts on the date and time when the request is received on the ~~BellSouth~~ AT&T side of the interface and the clock stops when the appropriate response has been transmitted through the same point to the requester. The average response interval for retrieving Pre-Ordering/Ordering/Maintenance & Repair information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month. ~~The following systems are observed in the Pre-Ordering/Ordering OSS Response Interval measurement: RSAG-Address, RSAG-TN, ATLAS, COFFI, DSAP, and CRIS. The following systems are observed in the Maintenance and Repair OSS Response Interval measurement: CRIS, DLETH, DLR, LMOS, LMOSupd, LNP Gateway, MARCH, OSPCM, Predictor, SOCS, and NIW.~~	**Business Rules** OSS Response Interval is designed to monitor the time required for the CLEC and BellSouth interface systems to obtain, from BellSouth's legacy systems, the information required to handle Pre-Ordering/Ordering/Maintenance and Repair functions. The clock starts on the date and time when the request is received on the BellSouth side of the interface and the clock stops when the appropriate response has been transmitted through the same point to the requester. The average response interval for retrieving Pre-Ordering/Ordering/Maintenance & Repair information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month. The following systems are observed in the Pre-Ordering/Ordering OSS Response Interval measurement: RSAG-Address, RSAG-TN, ATLAS, COFFI, DSAP, LASR, Verigate and CRIS. The following systems are observed in the Maintenance and Repair OSS Response Interval measurement: CRIS, DLETH, DLR, LMOS, LMOSupd, LNP Gateway,	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: Removal of duplicate measure reference to specific systems by name. Reference to systems in OSS Interface Tables already provided following the SQM Level of Disaggregation section (See Appendix C: OSS Interface Tables)	MARCH, OSPCM, Predictor, SOCS, and NIW. Propose Disaggregation into 3 separate elements:preordering, ordering, and maintenance. Should other interfaces as shown in AT&T diagram, i.e. BOG, SGG,LESOG,LNP,DDC, PRE be included in this measure?	

SQM Disaggregation - Analog/Benchmark	**SQM Level of Disaggregation**
	    SQM/~~SEEM~~ Analog/Benchmark
	
	Legacy System/Interface
	
	    Pre-Ordering/Ordering, OSS Response Average Interval
	        Regional
	Level………………………………………~~Parity~~Direct Comparison with Retail + 2 seconds
	        Maintenance & Repair OSS Response Average Interval
	
	Regional Level, Per OSS Interface……………………~~Parity~~Direct comparison with Retail +1 second
	
	(See Appendix C: OSS Interface Tables)
	
	Rationale:
	
	    Administrative change for clarity		

~~SEEM Measure~~	~~SEEM Tier I Tier II~~
	
	~~Yes ……………X~~
	
	Rationale:
	
	    Local markets irreversibly open.
	
	    Thirteen years since passage of 96 Telecom Act.
	
	    Tier 2 incentive to prevent backsliding no longer needed.
		SEEM Measure
		
		SEEM Tier I Tier II
		
		Yes X…………X
		
		[Comment: Given the new 22 state architecture it is important to be able to clearly see each area of the OSS on a by system basis. LASR continues to introduce defects which delay or require workarounds and needs to be	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Response times tend to be very consistent and the differences between retail and CLECs are generally fractions of a second depending on the application. When delays occur, it is frequently due to systems problems – measure OSS-2, OSS Interface Availability, captures system availability. System problems are infrequent.	carefully examined]	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Operations Support Systems (OSS)	
OSS-2	1A	OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)		
Definition		Percent of time OSS interface is functionally available compared to scheduled availability. Availability percentages for CLEC interface and for all Legacy systems accessed by them are captured. ("Functional Availability" is the amount of time in hours during the reporting period that the legacy systems are available to users. The planned System Scheduled Availability is the time in hours per day that the legacy system is scheduled to be available.) Scheduled availability is posted on the~~Interconnection~~ AT&T website: (~~http://www.interconnection.bellsouth.com/oss/oss_hour.html~~) Rationale: • Removal of specific URL to provide system platform flexibility for possible future rearrangements		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T agreed to keep the reference to the URL for System Scheduled Availability.*
Calculation		**OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)** = (a / b) ~~X~~x 100 a = Functional Availability in Minutes b = Scheduled Availability in Minutes Rationale: • Throughout the SQM document the mathematical operator representing multiplication has been corrected to a "x" rather than "*" or "X".		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SEEM Measure	SEEM ——— Tier I —— Tier II
	Yes.................................. X
	
	Rationale:
	
	• Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.
	• Eliminate Tier 2 remedies.
	    o Local markets irreversibly open.
	    o Thirteen years since passage of 96 Telecom Act.
	    o Tier 2 incentive to prevent backsliding no longer needed.
		SEEM Measure
		
		SEEM Tier I Tier II
		Yes .... X X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Operations Support Systems (OSS)	
PO-2	LMT	Loop Makeup- Response Time – Electronic		

Calculation	**Response Interval** $= (a - b)$ a = Date and time the LMUSI returned to CLEC b = Date and time the LMUSI is received **Percent within Interval** $= \underline{(c / d)}$ ~~X~~ x 100 $\underline{c}$ = Total LMUSIs received within the interval $\underline{d}$ = Total number of LMUSIs processed within the reporting period Rationale: • Throughout the SQM document, the mathematical operator representing multiplication has been corrected to a "x" rather than "*" or "X".		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**

Report Structure	• CLEC Aggregate
	• CLEC Specific
	• Geographic Scope
	  - State
	~~Interval for electronic LMUSIs:~~
	  ~~0 <= 1 minute~~
	
	Rationale:
	• Removed duplicate of standard interval value that is already included within the Benchmark section of this measure		

~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes.............X............X~~ Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. • Eliminate Tier I remedies from the plan. o $240 paid to one CLEC in Florida for Tier I remedies over past 12 months, June 2008 to May 2009, with all of that in		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	January to a single CLEC.		
	○ Receiving LMU information within one minute has little or no direct impact on a CLEC's ability to compete.		
	• Eliminate Tier 2 remedies.		
	○ Local markets irreversibly open.		
	○ Thirteen years since passage of 96 Telecom Act.		
	○ Tier 2 incentive to prevent backsliding no longer needed.		
	○ AT&T consistently provides a high level of performance. Average performance for past 12 months (6/08 to 05/09) was 99.43%.		
	○ No Tier 2 remedies incurred in the past 12-month period.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	**Ordering**	
O-2	AKC	~~Acknowledgement Message Completeness~~		

Definition	~~This measure provides the percent of transmissions/LSRs received via ordering interface gateways, which are acknowledged electronically.~~ ~~Rationale:~~ ~~• Eliminate metric to simplify plan.~~ ~~• AT&T consistently provides a high level of performance. Average performance for past 12 months (06/08 to 05/09) was 100%.~~ ~~• No Tier 1 remedies incurred over past 12 months.~~ ~~• No Tier 2 remedies incurred over past 12 months.~~ ~~• Measures equivalent process (Firm Order Confirmation or Reject Notification) measured by O-8 and O-9 metrics.~~ ~~• OSS-2, OSS Interface Availability, captures acknowledgement issues due to system functionality and availability.~~	Definition This measure provides the percent of transmissions/LSRs received via ordering interface gateways or <u>e-mail</u>, which are acknowledged electronically.	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
Exclusions	~~• Manually Submitted LSRs~~ ~~• Test Transactions/Records~~	Exclusions ~~• Manually Submitted LSRs~~ • Test Transactions/Records	
Business Rules	~~Ordering interface gateways send Functional Acknowledgements for all transmissions/LSRs, which are electronically submitted by a CLEC. Users of EDI may package many LSRs from multiple states in one transmission. If more than one CLEC uses the same ordering center, an Acknowledgement Message will be returned to the "Aggregator", however, BellSouth will not be able to determine which specific CLEC this message represented.~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	Acknowledgement Completeness = (a / b) X 100 a = Total number of Functional Acknowledgements returned in the reporting period for transmissions/LSRs electronically submitted by ordering interface gateways, respectively b = Total number of electronically submitted transmissions/LSRs received in the reporting period by ordering interface gateways, respectively		
Report Structure	• CLEC Aggregate • CLEC Specific • Geographic Scope Region		
SQM Disaggregation – Analog/Benchmark	SQM Level of Disaggregation......SQM/SEEM Analog/Benchmark • Acknowledgments ....Benchmark: 99.75%		
SEEM Measure	SEEM Tier I Tier II Yes...................X...............X		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Ordering	
O-3	FT	Percent Flow-Through Service Requests		

| **Business Rules** | The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) submitted through one of the mechanized ordering interface gateways, that flow through and reach a status for a FOC to be issued, without manual intervention. These LSRs can be divided into two classes of service: Business and Residence, and two types of service: Resale and Unbundled Network Elements (UNE). The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example: fax and courier) or are not designed to flow through (for example: Planned Manual Fallout).

Fatal Rejects: Errors that prevent an LSR, submitted electronically by the CLEC, from being processed initially. When an LSR is submitted by a CLEC, source systems will perform basic edit checks to ensure the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, source systems will reject the LSR and the CLEC will receive a Fatal Reject.

Auto-Clarification: Clarifications that are mechanically returned to the CLEC due to invalid data entry within the LSR. Edits contained within the source systems will perform data validity checks to ensure the data within the LSR is complete and accurate. For example, if the address on the LSR is not valid according to RSAG, or if the LNP is not available for the NPA NXX requested, the CLEC will receive an Auto-Clarification.

Planned Manual Fallout*: Fallout that occurs by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the L~~C~~SC. When a CLEC submits an LSR, the source systems will determine if the LSR should be forwarded to ~~LCSC~~ LSC for manual handling.

*See LSR Flow-Through Matrix on ~~BellSouth's~~ AT&T's ~~PMAP~~ performance measurement website ~~(http://pmap.bellsouth.com)~~ in the Documentation/Exhibits folder for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through

Total System Fallout: Errors that require manual review by the L~~C~~SC to determine if the error is caused by the CLEC, or is due to BellSouth system functionality. If it is determined the error is caused by the CLEC, the LSR | Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) submitted through one of the mechanized ordering interface gateways, that flow through and reach a status for a FOC to be issued, without manual intervention. These LSRs can be divided into two classes of service: Business and Residence, and two types of service: Resale and Unbundled Network Elements (UNE). ~~The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example: fax and courier) or are not designed to flow through (for example: Planned Manual Fallout).~~ | **Area to be subject of PSC Workshop and ultimately staff recommendation.** |

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	will be sent back to the CLEC for clarification. If it is determined the error is due to ~~BellSouth~~ AT&T system functionality, the ~~LCSC~~ LSC representative will correct the error and the LSR will continue to be processed. **Z Status:** LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR. Rationale: • Name change from BellSouth to AT&T and Local Carrier Service Center (LCSC) to Local Service Center (LSC) • Remove reference to PMAP to allow flexibility in the event of platform changes in the future • Remove reference to a specific URL to allow flexibility in the event of future platform changes.		
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation** **SQM/SEEM Analog/Benchmark** ~~Residence~~ ~~Benchmark:~~ ~~95%~~ ~~Business~~ ~~Benchmark:~~ ~~90%~~ ~~UNE-L (includes UNE-L with LNP)~~ ~~Benchmark:~~ ~~85%~~ ~~LNP~~ ~~Benchmark:~~ ~~95%~~	SQM Disaggregation - Analog/Benchmark SQM Level of Disaggregation SQM/SEEM Analog/Benchmark Residence Benchmark: 98% ~~95~~ Business Benchmark: 95% ~~90~~ UNE-L (includes UNE-L with LNP) Benchmark: 90% ~~95~~	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Flow Through.................................Benchmark: 90% Rationale: • Metric should emphasize overall flow through impact of a CLEC's order mix. • 90% Benchmark is an increase over current Benchmark for UNE-L and maintains that for Resale Business • 90% Benchmark represents excellent performance level. Partial Mechanized volume (Non-Flow Through) still requires FOCT of 10 hours.	LNP Benchmark: 98% 95	
SEEM Measure	SEEM Tier I Tier II Yes X...................X Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. Eliminate Tier 2 remedies. Local markets irreversibly open. Thirteen years since passage of 96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQ M#	Measure Category Code	Title of the Measure	Ordering
O-8	RI	Reject Interval	

| Exclusions | Service requests canceled by CLEC prior to being rejected/clarified Fatal Rejects LSRs identified as "Projects" ~~with the exception of valid "Project IDs" for Bulk Migration~~ Scheduled OSS Maintenance Test Transaction/Records Rationale: Project exclusion for bulk migration was related to UNE-P to Resale conversion. Deadline for UNE-P conversion has passed Measure for Bulk Migration was implemented in anticipation of high volumes of UNE-P to UNE-Loop conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 0 in February, 52 in March (27 for a single CLEC), 30 in April (all for that same CLEC), and 0 in May. | Exclusions Service requests canceled by CLEC prior to being rejected/clarified Fatal Rejects LSRs identified as "Projects" with the exception of valid "Project IDs" for Bulk Migration (except those associated with a M&A transaction) Scheduled OSS Maintenance Test Transaction/Records | **Parties Agree except for resolution of Tier-II elimination and LSRs submitted via e-mail and Non-Mechanized categorization that is highlighted.**

CLECs withdraw M&A transactions request for Exclusions.

The parties reached agreement as documented in the response to Action Item No. 4 to replace "Non-Mechanized" with "Email" and reduce the benchmark for Email from 18 business hours to 14 business hours. The parties further agreed to remove Bulk Migrations from the Business Rules. |

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	Service Requests are considered valid when submitted by the CLEC and pass edit checks to ensure the data received is correctly formatted and complete. When there are multiple rejects on a single LSR, the first reject issued is used for the calculation of the interval duration. For Partially Mechanized and Non-Mechanized LSR/ASRs, only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR/ASR until normal closing of the center, if an LSR/ASR is worked using overtime hours. In the case of a partially mechanized LSR/ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the ~~Interconnection~~ AT&T website:~~.~~ ~~(http://www.interconnection.bellsouth.com/centers)~~. **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until the LSR is rejected (date and time stamp of reject in ordering interface gateways). Auto Clarifications are considered in the Fully Mechanized category. **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until the ~~LCSC~~ LSC Service Representative clarifies the LSR back to the CLEC via ordering interface gateways. **Non-Mechanized:** The elapsed time from receipt of a valid LSR not submitted via electronic ordering systems (date and time stamp of ~~FAX or date and time paper LSRs are received in the LCSC~~Email) until notice of the reject (clarification) is returned to the CLEC via ~~FAX Server~~Email.	Business Rules Service Requests are considered valid when submitted by the CLEC and pass edit checks to ensure the data received is correctly formatted and complete. When there are multiple rejects on a single LSR, the first reject issued is used for the calculation of the interval duration. For Partially Mechanized and Non-Mechanized LSR/ASRs, only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR/ASR until normal closing of the center, if an LSR/ASR is worked using overtime hours. In the case of a partially mechanized LSR/ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the Interconnection website: (http://www.interconnection.bellsouth.com/centers). **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until the LSR is rejected (date and time stamp of reject in ordering interface gateways). Auto Clarifications are considered in the Fully Mechanized category. *Comment: The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?* ~~Non-Mechanized: The elapsed time from receipt of a valid LSR not submitted via electronic ordering systems (date and time stamp of FAX or date and time paper LSRs are received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via FAX Server.~~ **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until the LCSC Service Representative clarifies the LSR back to the CLEC via ordering interface gateways. **Local Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).	**Parties Agree that AT&T will include the website for hours of operations.**

Comment [A1]: The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC). ~~**Bulk Migrations:** Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time-stamp" from the receipt of the original Global Request.~~ Rationale: • Update to remove URL reference Currently the AT&T Pre-Ordering & Ordering Center is named the Local Service Center(LSC) not Local • Carrier Service Center (LCSC) • Email is current method for delivery of manual requests • Project exclusion for bulk migration was related to UNE-P to Resale conversion. • Deadline for UNE-P conversion has passed. Measure for Bulk Migration was implemented in anticipation of high volumes of UNE-P to UNE-Loop conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 0 in February, 52 in March (27 for a single CLEC), 30 in April (all for that same CLEC), and 0 in May.	**Bulk Migrations:** Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time-stamp" from the receipt of the original Global Request.	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	**Reject Interval** = (a - b) a = Date and time of service request rejection b = Date and time of service request receipt **Percent within Interval** = (c / d) ~~X~~x 100 c = Service requests rejected in reported interval d = Total service requests rejected in report period Rationale: • Throughout the SQM document, the mathematical operator representing multiplication has been corrected to a "x" rather than "*" or "X".		

Report Structure	One report with the following four Disaggregation Levels and their associated interval buckets:
	
	• Fully Mechanized:
	~~0 - <= 1 business hour~~
	• Partially Mechanized:
	~~0 - <= 10 business hours~~
	• Non-Mechanized:
	~~0 - <= 18 business hours~~
	• Local Interconnection Trunks:
	~~0 - <= 4 business days~~
	• CLEC Specific
	• CLEC Aggregate
	• Geographic Scope
	  - State
	
	Rationale:
	Removed duplicate of standard interval value that is already included within the Benchmark section of this measure
		Report Structure
		
		One report with the following four Disaggregation Levels and their associated interval buckets:
		
		• Fully Mechanized:
		0 - <= 1 business hour
		• Partially Mechanized:
		0 - <= 10 business hours
		• ~~Non-Mechanized:~~
		~~0 - <= 18 business hours~~
		• Local Interconnection Trunks:
		0 - <= 4 business days
		• CLEC Specific
		• CLEC Aggregate
		• Geographic Scope
		  State	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Disaggregatio n		**SQM Level of Disaggregation** **SQM/SEEM Analog/Benchmark** Fully Mechanized 97% <= 1 Business Hour Partially Mechanized 95% <= 10 Business Hours ~~Non-Mechanized~~ ~~95%~~ ~~<= 18 Business Hours~~ Local Interconnection Trunks 90% <= 2 ~~1~~ Business Days	

SEEM Measure	SEEM Tier I Tier II
	Yes.........................X..............X
	
	Rationale:
	
	Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.
	
	   • Eliminate Tier 2 remedies.
	      ○ Local markets irreversibly open.
	      ○ Thirteen years since passage of 96 Telecom Act.
	      ○ Tier 2 incentive to prevent backsliding no longer needed.		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQ M#	Measure Category Code	Title of the Measure	Ordering	
O-9	FOCT	Firm Order Confirmation Timeliness		

| Exclusions | • Service Requests canceled by CLEC prior to a FOC being returned
• Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only
• LSRs identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations
• Test Transactions/Records
• Scheduled OSS Maintenance

Rationale:
• Project exclusion for bulk migration was related to UNE-P to Resale conversion.
• Deadline for UNE-P conversion has passed.

Measure for Bulk Migration was implemented in anticipation of high volumes of UNE-P to UNE-Loop conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 0 in February, 52 in March (27 for a single CLEC), 30 in April (all for that same CLEC), and 0 in May. | • Service Requests canceled by CLEC prior to a FOC being returned
• Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only
• LSRs identified as "Projects with the_exception of valid "Projects IDs" for Bulk Migrations and M&A
• Test Transactions/Records
• Scheduled OSS Maintenance | **Parties Agree except for resolution of Tier-II elimination and LSRs submitted via e-mail and Non-Mechanized categorization that is highlighted.**

CLECs withdraw M&A transactions request for Exclusions.

The parties reached agreement as documented in the response to Action Item No. 4 to replace "Non-Mechanized" with "Email" and reduce the benchmark for Email from 24 business hours to 17 business hours. The parties further agreed to remove Bulk Migrations from the Business Rules. |
| Business Rules | When multiple FOCs occur on a single LSR/ASR, the first FOC is used to measure the interval.
For Partially Mechanized and Non-Mechanized LSR/ASRs, only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR/ASR until normal closing of the center, if an LSR/ASR is worked using overtime hours. In the case of a partially mechanized LSR/ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the Interconnection AT&T website:-. (http://www.interconnection.bellsouth.com/centers)
Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until | Comment:
The definition includes LSR and ASR. But the Business Rules_list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules? | **Parties Agree that AT&T will include the website for hours of operations.** |

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways. **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until appropriate service orders are issued by a ~~BellSouth~~ AT&T service representative and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways. **Non-Mechanized:** The elapsed time from receipt of a valid paper LSR not submitted via electronic systems (date and time stamp of ~~FAX or date and time paper LSRs received in LCSC~~ Email) until appropriate service orders are issued by a ~~BellSouth~~ AT&T service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via ~~FAX Server~~ Email. **Local Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC). ~~**Bulk Migrations:** Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time stamp" from the receipt of the original Global Request.~~ Rationale: - Update to remove reference to URL address. - Email is current method for delivery of manual requests - Project exclusion for bulk migration was related to UNE-P to Resale conversion. - Deadline for UNE-P conversion has passed. Measure for Bulk Migration was implemented in anticipation of high volumes of UNE-P to UNE-Loop conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 0 in February, 52 in March (27		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	for a single CLEC), 30 in April (all for that same CLEC), and 0 in May.		
Calculation	**Firm Order Confirmation Interval** = (a - b) a = Date and time of Firm Order Confirmation b = Date and time of service request receipt **Percent within Interval** = (c / d) ~~X~~x 100 c = Service requests confirmed in reported interval d = Total service requests confirmed in the report period Rationale: • Throughout this document, mathematical operator representing multiplication has been corrected to a "x" rather than "*" or "X".		
Report Structure	One report with the following four Disaggregation Levels and their associated interval buckets: Fully Mechanized: 0 - <= 3 business hours Partially Mechanized: 0 - <= 10 business hours Non-mechanized: 0 - <= 24 business hours Local Interconnection Trunks: 0 - <= 5 business days CLEC Specific CLEC Aggregate Geographic Scope - State Rationale: Removed duplicate of standard interval value that is already included within the Benchmark section of this measure	Report Structure One report with the following four Disaggregation Levels and their associated interval buckets: • Fully Mechanized: 0 - <= 3 business hours • Partially Mechanized: 0 - <= 10 business hours • Non-mechanized: 0 - <= 24 business hours • Local Interconnection Trunks: 0 - <= 5 business days • CLEC Specific • CLEC Aggregate • Geographic Scope State	
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation** **SQM/SEEM Analog/Benchmark** Resale - Residence (Non-Design)Fully Mechanized...............95% <= 3 business hours Resale - Business (Non-Design)Partially Mechanized...............95% <=	SQM Disaggregation - Analog/Benchmark SQM Level of Disaggregation SQM/SEEM Analog/Benchmark • Resale – Residence (Non-Design) Fully Mechanized: 95%	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	10 business hours ~~Resale – Design (Special)~~Non-Mechanized...............................95% <= 24 business hours ~~LNP (Standalone)~~ ~~UNE Analog Loop~~ ~~UNE Analog Loop with LNP~~ ~~UNE Digital Loop >= DS1~~ Local Interconnection Trunks...":...................................95% <= 5 business days Rationale: Intent of metric is to measure response time of FOC. Product being ordered is insignificant. Simplify reporting by aggregating products to mechanization level. Level of disaggregation consistent with O-8, Reject Interval, metric.	<= 3 business hours • Resale – Business (Non-Design) Partially Mechanized: 95% <= 10 business hours • Resale – Design (Special) ~~Non-Mechanized, 95% <= 24 business hours~~ • LNP (Standalone) • UNE Analog Loop • UNE Analog Loop with LNP • UNE Digital Loop >= DS1 • UNE ISDN/UDC/IDSL • UNE Other • UNE Line Splitting • UNE EELs • UNE xDSL (ADSL, HDSL, UCL) • Local Interconnection Trunks 95% <= 5 business days	
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes.................... X............. X~~ Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. • Eliminate Tier 2 remedies. ○ Local markets irreversibly open. ○ Thirteen years since passage of 96 Telecom Act. ○ Tier 2 incentive to prevent backsliding no longer needed.		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Ordering	
O-11	FOCC	~~Firm Order Confirmation and Reject Response Completeness~~		
Definition	~~This measurement provides the percent of Local Service Requests (LSRs)/Access Service Requests (ASRs) received during the reporting period that are responded to with either a reject or firm order confirmation.~~ ~~Rationale:~~ ~~• Eliminate metric to simplify plan.~~ ~~• AT&T provides a "high level of performance, .from 06/08 to 05/09, FM = 99.91%, PM = 99.65%, NM = 97.06%~~ ~~• Measures equivalent process (Firm Order Confirmation or Reject Notification) measured by O-8 and O-9 metrics.~~ ~~• OSS-2, OSS Interface Availability, captures response issues due to system functionality and availability.~~		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T agreed to keep the FOCC metric by the response to Action Item No. 4 to replace "Non-Mechanized" with "Email". Consistent with the RI and FOCT metrics, Bulk Migrations was removed from the Business Rules.*
Exclusions	~~• Service requests canceled by the CLEC prior to FOC or Reject being sent~~ ~~• Fatal Rejects~~ ~~• LSRs identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations~~ ~~• Test Transactions/Records~~	Exclusions • Service requests canceled by the CLEC prior to FOC or Reject being sent • Fatal Rejects • LSRs identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations <u>and M&A</u> • Test Transactions/Records	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	**Fully Mechanized:** ~~The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways).~~ **Partially Mechanized:** ~~The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways), which fallout for manual handling by the LCSC personnel.~~ **Non-Mechanized:** ~~The number of FOCs or Rejects sent to the CLECs via FAX server in response to manually submitted LSRs/ASRs (date and time stamp in FAX Server).~~ **Local Interconnection Trunks:** ~~Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).~~ **Bulk Migrations:** ~~Requests for Bulk Migrations will come into BellSouth via Global Requests. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure.~~	Business Rules\n\n**Fully Mechanized:** The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways).\n\nThe definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?\n\n**Partially Mechanized:** The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways), which fallout for manual handling by the LCSC personnel.\n\n**Non-Mechanized:** ~~The number of FOCs or Rejects sent to the CLECs via FAX server in response to manually submitted LSRs/ASRs (date and time stamp in FAX Server).~~\n\n**Local Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).\n\n**Bulk Migrations:** Requests for Bulk Migrations will come into BellSouth via Global Requests. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure.	
Calculation	~~Firm Order Confirmation / Reject Response Completeness = (a / b) X 100~~ • ~~a = Total number of service requests for which a Firm Order Confirmation or Reject is sent~~ • ~~b = Total number of service requests received in the report period~~		

Comment [A2]: The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Report Structure

AT&T column:
~~One report with the following four Disaggregation Levels:~~
~~Fully Mechanized~~
~~Partially Mechanized~~
~~Non-Mechanized~~
~~Local Interconnection Trunks~~
~~CLEC Specific~~
~~CLEC Aggregate~~
~~Geographic Scope~~
~~State~~

CLEC column:
Report Structure

- One report with the following four Disaggregation Levels:
  Fully Mechanized
  -Partially Mechanized
  ~~Non-Mechanized~~
  Local Interconnection Trunks
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  State

SQM Disaggregation – Analog/Benchmark

AT&T column:
SQM Level of Disaggregation
SQM/SEEM Analog/Benchmark

~~Fully Mechanized~~ 98% ~~Returned~~

~~Partially Mechanized~~ 95% ~~Returned~~

~~Non-Mechanized~~ 95% ~~Returned~~

~~Local Interconnection Trunks~~ 95% ~~Returned~~

CLEC column:
gregation - Analog/Benchmark

SQM Level of Disaggregation
SQM/SEEM Analog/Benchmark

Fully Mechanized
98% Returned

Partially Mechanized
95% Returned

~~Non-Mechanized~~
~~95% Returned~~

Local Interconnection Trunks
95% Returned

SEEM Measure

AT&T column:
~~SEEM   Tier I   Tier II~~
~~Yes .... X .... X~~

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Ordering	
O-12	OAAT	Average Answer Time - Ordering Centers		
Business Rules		The duration starts when a CLEC representative or ~~BellSouth~~ AT&T customer makes a choice on the ordering center's menu and is put in queue for the next service representative and stops when ~~a~~ ~~BellSouth~~ an AT&T service representative answers the call. Abandoned calls are not included in the volume of calls handled but are included in total seconds. ~~Small Business has a universal call center where the same service representatives handle both ordering and maintenance calls.~~ Rationale: AT&T is eliminating the reference to the business unit comparison as it is no longer applicable with the establishment of a benchmark for this measure.		**Parties Agree to AT&T's proposed changes except for resolution of Tier-II elimination that is highlighted.**
Report Structure		• CLEC Aggregate ~~BellSouth Aggregate~~ ~~Business Service Center~~ • Geographic Scope ▪ Region Rationale: Dissimilar call processing activities occur within the Wholesale and retail centers making a comparison unlikely	Report Structure • CLEC Aggregate • BellSouth Aggregate ▪ Business Service Center ▪ Consumer Service Center • Geographic Scope ▪ Region	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM Disaggregation - Analog/Bench mark	**SQM Level of Disaggregation**
	SQM/SEEM Analog/Benchmark
	
	Parity with Retail (Business Service Center) Average Answer Time <=30 seconds
	
	Rationale:
	
	There is no equivalent retail analog comparison as processing for small business is different than processing for LSC.
	
	Unlike the retail centers, the LSC handles calls for products that are not measured by the plan and for calls from CLECs that do not relate to a measured product.
	
	Calls on more than one account (up to 5 different problems on one call) will make the call times longer than what retail requires for a single account report.
	
	Thirty seconds is sufficient time to answer the call.
		SQM Disaggregation - Analog/Benchmark
		
		SQM Level of Disaggregation
		    SQM/SEEM Analog/Benchmark
		
		    CLEC Local Carrier Service Center
		    Parity with Retail (Business Service Center <u>& Consumer Service center</u>))	

SEEM Measure	SEEM Tier I Tier II
	
	Yes...................................X
	
	Rationale:
	
	• Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.
	
	• Eliminate Tier 2 remedies.
	
	    o Local market irreversibly open.
	
	    o Thirteen years since passage of 96 Telecom Act.
	
	    o Tier 2 incentive to prevent backsliding no longer needed.
		SEEM Measure
		
		SEEM Tier I Tier II
		Yes....................<u>X</u>.............X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Provisioning	
P-1	HOI	Held Order Interval		

SQM Disaggregation Analog/Benchmark			
SQM Level of Disaggregation **SQM Analog/Benchmark** Resale Residence (Non-Design) Retail Residence (Non-Design) Resale Business (Non-Design) Retail Business (Non-Design) Resale Design Retail Design UNE Analog Loop (Design) Retail Residence, Business, and Design (Dispatch) (Excluding Digital Loops) UNE Analog Loop (Non-Design) Retail Residence and Business - POTS (Excluding Switch Based Orders) UNE Digital Loop >= DS1 Retail Digital Loop >= DS1 UNE EELs Retail DS1/DS3 UNE xDSL (HDSL, ADSL, ~~and~~ UCL, <u>and Line Splitting</u>) ADSL Provided to Retail UNE ISDN/UDC/IDSL Retail ISDN – BRI ~~UNE Line Splitting ADSL Provided to Retail~~ ~~UNE Other Design Diagnostic~~ ~~UNE Other Non-Design Diagnostic~~ Local Interconnection Trunks Direct comparison~~Parity~~ with Retail Trunks			**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T agreed to Comcast's request documented in Action Item No. 8 to change the Local Interconnection Trunks level of disaggregation from a retail analog to a benchmark of <= 2% held for 5 days or more due to lack of facilities.* *In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*
Rationale: Combine DSL like services into a single disaggregation. Performance standard for both existing disaggregations are identical (retail analog is ADSL service). AT&T has not reported CLEC transactions for the UNE Line Splitting submeasure for at least the last 12-month period. Combining this disaggregation with UNE xDSL will have no impact on results. Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures			

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	being processed. AT&T has not reported any data for these submeasures for the past 12 months. Administrative change for clarity		
SEEM Measure	SEEM ——————— Tier I —————— Tier II No .... Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.	Compsouth requests a diagnostic measure that indicates the number of orders PF due to copper not being available. This could be accomplished as a subset of this measure or new measure	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-2A	PJ48	Percentage of Orders Given Jeopardy Notices >= 48 Hours		

| **Exclusions** | | | Exclusions

- Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or T).
- Disconnect Orders
- Orders issued with a due date of less than 48 hours
- ~~Orders jeopardized on the due date. This exclusion only applies when the technician on premises has attempted to provide service but must refer to Engineer or Cable Repair fo facility jeopardy.~~
- Listing Orders | **Parties Agree.**

CLECs withdrew request to strike Exclusion and to make this a Tier-I remedied metric. |
|---|---|---|---|---|
| **SQM Disaggregation Analog/Benchmark** | | **SQM Level of Disaggregation Analog/Benchmark**   **SQM/~~SEEM~~**

Resale Residence (Non-Design) hours   95% > = 48

Resale Business (Non-Design) hours   95% > = 48

Resale Design hours   95% > = 48

UNE Analog Loop (Design) hours   95% > = 48

UNE Analog Loop (Non-Design) hours   95% > = 48

UNE Digital Loop >= DS1 hours   95% > = 48 | | *In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.* |

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	UNE EELs 95% > = 48 hours UNE xDSL (HDSL, ADSL, ~~and~~ UCL, <u>and Line Splitting</u>) 95% > = 48 hours UNE ISDN/UDC/IDSL 95% > = 48 hours ~~UNE Line Splitting 95% > = 48 hours~~ ~~UNE Other Design 95% > = 48 hours~~ ~~UNE Other Non-Design 95% > = 48 hours~~ Local Interconnection Trunks 95% > = 48 hours Rationale: Combine DSL like services into a single disaggregation. Performance standard for both existing disaggregations are identical (retail analog is ADSL service). AT&T has not reported CLEC transactions for the UNE Line Splitting submeasure for at least the last 12-month period, 06/08 through 05/09. Combining this disaggregation with UNE xDSL will have no impact on results. Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. AT&T has reported less than 30 CLEC transactions for these submeasures combined for at least the last 12 months.		
~~SEEM Measure~~	~~SEEM................Tier I.........Tier II~~ ~~No~~ Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.	SEEM Measure SEEM Tier I Tier II ~~No~~Yes ....X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning
P-2B	PJ	Percentage of Orders Given Jeopardy Notices	

| Exclusions | | Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or T). Disconnect Orders Listing Orders Orders jeopardized on the due date ~~Orders issued with a due date of less than or equal to 48 hours~~ | **Parties Agree to AT&T's proposed changes and to CLECs' proposal for removal of exclusion in metric.** **AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".** *In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.* |

SQM Section	AT&T's Filed Proposed Changes/Rationale		CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation Analog/Benchmark	SQM/SEEM		
	Resale Residence (Non-Design) (Non-Design)	Retail Residence		
	Resale Business (Non-Design) (Non-Design)	Retail Business		
	Resale Design	Retail Design		
	UNE Analog Loop (Design) Business and Design (Dispatch) (Excluding	Retail Residence,		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Digital Loops)		
	UNE Analog Loop (Non-Design) Retail Residence and Business - POTS (Excluding Switch Based Orders)		
	UNE Digital Loop >= DS1 Retail Digital Loop >= DS1		
	UNE EELsRetail DS1/DS3		
	UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail		
	UNE ISDN/UDC/IDSL Retail ISDN - BRI		
	UNE Line Splitting ADSL Provided to Retail		
	UNE Other Design Diagnostic		
	UNE Other Non-Design Diagnostic		
	Local Interconnection Trunks Direct comparisonParity with Retail Trunks		
	Rationale:		
	Combine DSL like services into a single disaggregation.		
	Performance standard for both existing disaggregations are identical (retail analog is ADSL service).		
	AT&T has not reported CLEC misses for the UNE Line Splitting submeasure for at least the last 12-month period, June 08 through May 09. Combining this disaggregation with UNE xDSL will have no impact on results.		
	Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. AT&T has reported less than 30 CLEC jeopardy notices for these submeasures combined for at least the last 12 months.		
	Administrative change for clarity		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	SEEM................Tier I..........Tier II No Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
P-3	M1A	Percent Missed Installation Appointments		

Exclusions			Exclusions	**Parties Agree to AT&T's proposed changes except for resolution of Tier-II elimination that is highlighted.**
			~~Orders canceled prior to the due date including orders that are to be provisioned on the same day they are placed. ("Zero Due Date Orders")~~ • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Disconnect Orders • Listing Orders	**AT&T agrees to modify Exclusion to read: "Orders canceled on or prior to the due date."**

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SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation Analog/Benchmark**	**SQM/~~SEEM~~**		**AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".**
	Resale Residence (Non-Design) Residence (Non-Design)	Retail		*AT&T agreed to Comcast's request documented in Action Item No. 8 to change the Local Interconnection Trunks level of disaggregation from a retail analog to a benchmark of <= 5%.*
	Resale Business (Non-Design) (Non-Design)	Retail Business		*In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*
	Resale Design	Retail Design		
	LNP (Standalone) Residence and Business (POTS)	Retail		
	UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail		
	UNE Analog Loop (Non-Design) Residence and Business – POTS (Excluding Switch	Retail		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Based Orders)		
	UNE Analog Loop with LNP-Design Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)		
	UNE Analog Loop with LNP-Non-Design Retail Residence and Business – POTS (Excluding Switch Based Orders)		
	UNE Digital Loop >= DS1 Retail Digital Loop >= DS1		
	UNE EELs Retail DS1/DS3		
	UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail		
	UNE ISDN/UDC/IDSL Retail ISDN – BRI		
	UNE Line Splitting ADSL Provided to Retail		
	UNE Other Design Diagnostic		
	UNE Other Non-Design Diagnostic		
	Local Interconnection Trunks Direct comparisonParity with Retail Trunks		
	Rationale:		
	Combine DSL like services into a single disaggregation.		
	Performance standard for both existing disaggregations are identical (retail analog is ADSL service).		
	AT&T has reported less than 5 CLEC missed appointments for the UNE Line Splitting submeasures for at least the last 12-month period, June 08 through May 09. Combining this disaggregation with UNE xDSL will have only a minimal impact on results.		
	Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. AT&T has reported only 5 CLEC misses for these submeasures combined for at least the last 12 months.		
	Administrative change for clarity		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	SEEM Tier I Tier II Yes................ X................ X Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. • Eliminate Tier 2 remedies. ○ Local market irreversibly open. ○ Thirteen years since passage of 96 Telecom Act. ○ Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Provisioning
P-4	OCI	Order Completion Interval (OCI)	

Business Rules	The completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from when ~~BellSouth~~ AT&T issues a FOC/SOCS date time-stamp indicating receipt of an order (application date) from the CLEC to ~~BellSouth's~~ AT&T's order completion date. Orders worked on zero due dates are calculated with a .33-day interval (8 hours). Orders can be either dispatch or non-dispatch. Only valid business days will be included in the calculation of this interval. Valid business days may be found at the ~~following~~ AT&T website: ~~(http://www.interconnection.bellsouth.com/#localorderinghandbook/intervalguide).~~ ~~Rationale:~~ ~~Update to provide reference to website rather than the URL for a specific site that may change in future platform rearrangements.~~		**Area to be subject of PSC Workshop and ultimately staff recommendation.** **AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".** *AT&T agreed to keep the reference to the URL for valid business days.*
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation Analog/Benchmark** ~~SQM/SEEM~~ Analog/Benchmark		*In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*
	Resale Residence (Non-Design) Residence (Non-Design) Retail		
	Resale Business (Non-Design) Business (Non-Design) Retail		
	Resale Design Retail Design		
	LNP (Standalone) Residence and Business (POTS) Retail		
	UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops) Retail		
	UNE Analog Loop (Non-Design) Residence and Business (Dispatch) Retail		
	UNE Analog Loop with LNP-Design Retail		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Residence, Business and Design (Dispatch) (Excluding Digital Loops)		
	UNE Analog Loop with LNP-Non-Design Retail Residence and Business (Dispatch)		
	UNE Digital Loop >= DS1 Retail Digital Loop >= DS1(Dispatch)		
	UNE EELs Retail DS1/DS3(Dispatch)		
	UNE xDSL (HDSL, ADSL, ~~and~~ UCL, <u>and Line Splitting</u>)		
	<= 5 Business Days		
	<= 11 Business Days		
	UNE ISDN/UDC/IDSL Retail ISDN - BRI		
	~~UNE Line Splitting without Conditioning~~ ~~ADSL~~ ~~Provided to Retail~~		
	~~with Conditioning <= 11 Business Days~~		
	~~UNE Other Design~~ ~~Diagnostic~~		
	~~UNE Other Non-Design~~ ~~Diagnostic~~		
	Local Interconnection Trunks Direct comparison~~Parity~~ with Retail Trunks		
	Rationale:		
	Combine DSL like services into a single disaggregation.		
	The benchmark performance standard is applicable to all DSL like services.		
	Of the four different UNE Line Splitting disaggregations, AT&T has not reported CLEC miss for at least the last 12-month period. Combining this disaggregation with UNE xDSL will have no impact on results.		
	Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12 months, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.		
	Administrative change for clarity		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SEEM Measure	SEEM Tier I Tier II
	Yes .... X X
	
	Rationale:
	
	• Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan
	• Eliminate Tier 1 remedies
	   ○ Measures same process of providing service to end-user that is captured by other metrics.
	   ○ Critical customer service affecting metric is P-3, Percent Missed Installation Appointments (MIA).
	   ○ Will continue to provide performance measurement reports
	• Eliminate Tier 2 remedies.
	   ○ Local market irreversibly open.
	   ○ Thirteen years since passage of 96 Telecom Act.
	Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	
P-5	CNI	Average Completion Notice Interval	

SQM Section	AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale	
Business Rules		**Business Rules** The interval begins with the completion date and time and the interval ends with release of the notice of completion status to the CLEC. The field technician notifies the CLEC the work was complete and then he/she enters the completion time stamp information in his/her computer. This information switches through to the SOCS systems to the Work Management Center (WMC), either completing or rejecting the order. If the completion is rejected, it is manually corrected and then completed by the WMC. The notice is returned on each individual order. The end time for mechanized orders is the time stamp when the notice was delivered to the CLEC interface. For non-mechanized orders the end time will be date and timestamp of order update from the C-SOTS system For the retail analog, the start time begins when the technician completes the order and ends when the order status is changed to complete in SOCS.	**Area to be subject of PSC Workshop and ultimately staff recommendation.** **AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".**
Report Structure		Report Structure - CLEC Specific - CLEC Aggregate - BellSouth Aggregate - Mechanized Orders - Reporting intervals in hours - Non Mechanized Orders - Geographic Scope State	*In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*

SQM Section	AT&T's Filed Proposed Changes/Rationale		CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation Analog/Benchmark**	**SQM**		
	• Resale Residence (Non-Design) (Non-Design)	Retail Residence		
	• Resale Business (Non-Design) (Non-Design)	Retail Business		
	• Resale Design	Retail Design		
	• LNP (Standalone) and Business (POTS)	Retail Residence		
	• UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail		
	• UNE Analog Loop (Non-Design) and Business – POTS (Excluding Switch Based Orders)	Retail Residence		
	• UNE Analog Loop with LNP - Design Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail		
	• UNE Analog Loop with LNP- Non-Design and Business – POTS (Excluding Switch Based Orders)	Retail Residence		
	• UNE Digital Loop >= DS1 Loop >= DS1	Retail Digital		
	• UNE EELs	Retail DS1/DS3		
	• UNE xDSL (HDSL, ADSL, ~~and~~ UCL, and Line Splitting) ADSL Provided to Retail			
	• UNE ISDN/UDC/IDSL BRI	Retail ISDN -		
	• ~~UNE Line Splitting~~ ~~to Retail~~	~~ADSL Provided~~		
	• ~~UNE Other Design~~	~~Diagnostic~~		
	• ~~UNE Other Non-Design~~	~~Diagnostic~~		
	• Local Interconnection Trunks comparison~~Parity~~ with Retail Trunks	Direct		
	Rationale: Combine DSL like services into a single disaggregation. Performance standard for both existing disaggregations are identical (retail			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	analog is ADSL service). The performance results for the combination of these submeasures will be consistent with the results of each submeasure separately. Combining this disaggregation with UNE xDSL will have no impact on results. Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. With no applicable retail analogs for these submeasures for at least the last 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results Administrative change for clarity		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~No.................................~~ Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.	SEEM Measure SEEM Tier I Tier II ~~No~~ .... <u>X</u>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQ M#	Measure Category Code	Title of the Measure	Provisioning		
P-7	CCI	Coordinated Customer Conversions– Hot Cut Duration			

SEEM Measure	SEEM — Tier I — Tier II Yes...................... X .... X Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan • Eliminate Tier 2 remedies. ○ Local market irreversibly open. ○ Thirteen years since passage of 96 Telecom Act. ○ Tier 2 incentive to prevent backsliding no longer needed.		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-7A	CCT	Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval		

SEEM Measure		SEEM Tier I Tier II
		Yes.................... X............... X
		
		Rationale:
		
		• Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan
		
		• Eliminate Tier 2 remedies.
		
		    o Local market irreversibly open.
		
		    o Thirteen years since passage of 96 Telecom Act.
		
		    o Tier 2 incentive to prevent backsliding no longer needed.
				Parties Agree except for resolution of Tier-II elimination that is highlighted.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-7B	CCRT	Coordinated Customer Conversions – Average Recovery Time		
Definition		This report measures outages associated with Coordinated Customer Conversions prior to service order completion, which can be isolated to BellSouth's side of the network. Rationale: • Eliminate metric to simplify plan. • AT&T consistently provides a high level of performance. • During the last 12-month period, June 08 through May 09, CLEC missed volume reported 3 outages that were associated with coordinated conversions.		**Parties Agree to eliminate metric.**
Exclusions		• Conversions where service outages are due to CLEC-caused reasons • Conversions where service outages are due to end-user caused reasons • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders etc., which may be order types C, N, R or T) • Listing Orders		
Business Rules		Measures the outage duration time related to Coordinated Customer Conversions from the initial trouble notification until the service has been restored and the CLEC has been notified. The interval is calculated on the total outage time for the circuits divided by the total number of outages restored during the report period to give the average outage duration. This measure also displays the overall percentage of orders which did not experience a trouble during a coordinated conversion.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

~~Calculation~~	~~Recovery Time = (a - b)~~
	  • ~~a = Date and time the initial trouble is cleared and the CLEC is notified~~
	  • ~~b = Date and time the initial trouble is opened with BellSouth~~
	~~Average Recovery Time = (c / d)~~
	  • ~~c = Sum of all the Recovery Times~~
	  • ~~d = Number of troubles referred to BellSouth~~
	~~Percentage of Items with No Troubles = (e / f) X 100~~
	  • ~~e = Total items in the reporting period that did not have a trouble during a coordinated conversion~~
	  • ~~f = Total items for the reporting period~~
		Calculation
		
		Recovery Time = (a - b)
		  • a = Date and time the initial trouble is cleared and the CLEC is notified <u>by call or email</u>
		  • b = Date and time the initial trouble is opened with BellSouth	

~~Report Structure~~	• ~~CLEC Specific~~ • ~~CLEC Aggregate~~ • ~~Geographic Scope~~ ~~State~~		
~~SQM Disaggregation Analog/Benchmark~~	~~SQM Level of Disaggregation SQM/SEEM Analog/Benchmark~~ ~~Coordinated Customer Conversions (Loops)~~ ~~<= 5 Hours~~		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~No...................~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-7C	CPT	Hot Cut Conversions - Percent Provisioning Troubles Received within 5 Days of a Completed Service Order		
Definition	This report measures the percentage of provisioning troubles received within 5 days of a completed service order associated with a Coordinated and Non-Coordinated Customer Conversion and ensures the quality and accuracy of Hot Cut Conversion activities. Rationale: • Eliminate metric to simplify plan • Measures same process captured by P-9 (PPT), Percent Provisioning Troubles within "X" Days of Service Order Completion. • AT&T consistently provides a high level of performance. o Performance for past 12 months for dispatch and non-dispatch (June 2008 to May 2009) averaged 1.45% against a benchmark of <=3%.		**Parties Agree to eliminate metric.**

Exclusions	– CLEC Canceled Orders
	– Troubles caused by Customer Provided Equipment (CPE) or CLEC Equipment
	– Listing Orders
	– Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or T)
	– Troubles outside of BellSouth's control
	  – A cut or damaged cable, caused by other than BellSouth employees or contractors
	  – Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth
	Disconnect Orders		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	The first trouble report received on a circuit ID within 5 days following a service order completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate.		
Calculation	**Percentage of Provisioning Troubles within 5 Days of Service Order Completion** = (a / b) X 100 • a = The sum of all Hot Cut Circuits with a trouble within 5 days following service order(s) completion • b = The total number of Hot Cut Circuits completed in the previous reporting period		
Report Structure	• CLEC Specific • CLEC Aggregate • Dispatch/Non-Dispatch • Geographic Scope State		
SQM Disaggregation Analog/Benchmark	——— SQM Level of Disaggregation **SQM/SEEM Analog/Benchmark** • UNE Loops		
SEEM Measure	SEEM ———— Tier I ——— Tier II No...............................		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-7D	NCDD	Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date		

SEEM Measure	SEEM Tier I Tier II Yes.................X.............X Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan • Eliminate Tier 2 remedies. ○ Local market irreversibly open. ○ Thirteen years since passage of 96 Telecom Act. ○ Tier 2 incentive to prevent backsliding no longer needed.		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQ M#	Measure Category Code	Title of the Measure	Provisioning		
P-9	PPT	Percent Provisioning Troubles within "X" Days of Service Order Completion			

SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation** **Analog/Benchmark**	**SQM/~~SEEM~~**		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**
	Resale Residence (Non-Design) (Non-Design)	Retail Residence		
	Resale Business (Non-Design) (Non-Design)	Retail Business		**AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".**
	Resale Design	Retail Design		
	LNP (Standalone) and Business (POTS)	Retail Residence		
	UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail		*AT&T provided new proposal as response to Action Item No. 16 for three measures (P-9, M&R-2, M&R-4).*
	UNE Analog Loop (Non-Design) and Business - POTS (Excluding Switch Based Orders)	Retail Residence		*In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*
	UNE Analog Loop with LNP Design Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail		
	UNE Analog Loop with LNP Non-Design and Business - POTS (Excluding Switch Based Orders)	Retail Residence		
	UNE Digital Loop >= DS1 Loop >= DS1	Retail Digital		
	UNE EELs	Retail DS1/DS3		
	UNE xDSL (HDSL, ADSL, ~~and~~ UCL, and Line Splitting) ADSL Provided to Retail			
	UNE ISDN/UDC/IDSL	Retail ISDN-BRI		
	~~UNE Line Splitting~~ ~~to Retail~~	~~ADSL Provided~~		
	~~UNE Other Design~~	~~Diagnostic~~		
	~~UNE Other Non-Design~~	~~Diagnostic~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	Local Interconnection Trunks Direct comparison~~Parity~~ with Retail Trunks
	
	Rationale:
	
	  Combine DSL like services into a single disaggregation.
	
	  Performance standard for both existing disaggregations are identical (analog is retail ADSL service).
	
	  Combining this disaggregation with UNE xDSL will have minimal impact on results.
	
	  Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12 months, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.
	
	  Administrative change for clarity		

~~SEEM Measure~~	~~SEEM Tier I Tier II~~
	~~Yes X....................... X~~
	Rationale:
	    Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan
	    Eliminate Tier 2 remedies.
	    Local market irreversibly open.
	    Thirteen years since passage of 96 Telecom Act.
	    Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-11	SOA	Service Order Accuracy		

Definition	This report measures the accuracy and completeness of CLEC requests for service by comparing the CLEC Local Service Request (LSR) to the completed service order after provisioning has been completed. Only electronically submitted LSRs that require manual handling (Partially Mechanized) by an ~~BellSouth~~ AT&T service representative in the ~~LCSC~~ LSC are measured. Rationale: • Currently the AT&T Pre-Ordering and Ordering Center is named Local Service Center (LSC)	Exclusions • Canceled Service Orders • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Disconnect Orders • CLEC LSRs submitted electronically that are not manually handled by BellSouth (Flow-Through) • "Projects" with no LSR (excluding M&A projects)	**Area to be subject of PSC Workshop and ultimately staff recommendation.** *CLECs agreed per their response to Action Item No. 36 with AT&T's proposal per Action Item No. 11 to keep the metric as is currently structured with the exception that the Level of Disaggregation be combined into one instead of the current two levels (Resale and UNE).*
Exclusions	• Canceled Service Orders • Order activities of ~~BellSouth~~ AT&T or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Disconnect Orders • CLEC LSRs submitted electronically that are not manually handled by ~~BellSouth~~ AT&T (Flow-Through) • "Projects" with no LSR • LNP Trigger Orders Rationale: • LNP Trigger Orders are internal administrative orders. • Trigger Orders alert downstream systems that a telephone number is getting ready to be ported out and do not prevent the port activity from taking place		
Business Rules	The CLEC requested services on the LSR are mechanically compared to the completed service order using the CLEC affecting service attributes		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	shown below.
	
	Selected CLEC Affecting Service Attributes
	
	The ~~BellSouth~~ AT&T Local Service Request (LSR) fields identified below will be used, as applicable, for this Service Order Accuracy review process.
	
	A service affecting comparison of the fields listed below will determine the accuracy of the provisioning process. ~~If any~~ Each of the service affecting fields listed below are populated on the LSR. If the entries ~~and~~ do not match the corresponding field on the Service Order (s), and are service affecting, the ~~order~~ field will be scored as a miss.
	
	~~BellSouth~~ AT&T will maintain a list of ~~LCSC~~ LSC/System workarounds which will not be considered service affecting. This list will be identified in a document posted on the ~~Interconnection~~ AT&T website. ~~CLECs may discuss any of the posted LCSC /System workarounds during the regular PMAP notification calls.~~
	
	For Listing Orders:
	
	    Company Code
	    ~~PON~~
	    ~~Billed Telephone Number~~
	    ~~Telephone Number~~
	    ~~Ported Telephone Number~~
	    ~~Circuit ID~~
	    ~~PIC~~
	    ~~LPIC~~
	    Directory Listing
	        Directory Delivery Address
	        Listing Activity
	        ~~Alphanumeric Listing Identifier Code~~
	        Record Type
	        Listing Type
	        Listed Telephone Number
	        Listed Name, Last Name
	        Listed Name, First Name
	        Address Indicator
	        Listed Address House Number
	
	        Listed Address House Number Suffix
	        Listed Address Street Directional
	        Listed Address Street Name
	        Listed Address Thoroughfare
	        Listed Address Street Suffix
	        Listed Address Locality
	        Yellow Pages Heading
		* Feature Detail will only be checked for the following USOCs: GCE, GCJ, CREX4, GCJRC, GCZ, DRS, VMSAX, S98VM, S98AF, SMBBX, MBBRX [USOC list incomplete? Could reference to USOC manual be used?]. USOCs and FIDs for Feature Detail will be posted on the Interconnection Website. Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this Website.	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: • Changing the measurement to review critical fields for the percentage of accuracy. This will provide a truer picture of service order accuracy. • Review only the service affecting fields for listing orders which are different from the fields for provisioning orders. Specifically identify the particular service affecting fields by order type.		

	For Provisioning Orders:
	    Company Code
	    PON
	    Billed Telephone Number
	    Telephone Number
	    Ported Telephone Number
	    Circuit ID
	    PIC
	    LPIC
	    Directory Listing
	        Directory Delivery Address
	        Listing Activity
	        Record Type
	        Listing Type
	        Listed Telephone Number
	        Listed Name, Last Name
	        Listed Name, First Name
	        Address Indicator
	        Listed Address House Number
	        Listed Address House Number Suffix
	        Listed Address Street Directional
	        Listed Address Street Name
	        Listed Address Thoroughfare
	        Listed Address Street Suffix
	        Listed Address Locality
	        Yellow Pages Heading
	    Features
	        Feature Activity
	        Feature Codes
	        Feature Detail*
	    Hunting
	        Hunt Group Activity
	        Hunt Group Identifier		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Telephone Number Identifier Hunt Type Code Hunt Line Activity Hunting Sequence Number Type Hunting Telephone Number		
	~~E911 Listing~~ Service Address Information Service Address House Number Service Address House Number Suffix Service Address Street Directional Service Address Street Name Service Address Thoroughfare Service Address Street Suffix Service Address Descriptive Location EATN ATN APOT CFA NC NCI * Feature Detail will only be checked for the following USOCs: GCE, GCJ, CREX4, GCJRC, GCZ, DRS, VMSAX, S98VM, S98AF, SMBBX, MBBRX. USOCs and FIDs for Feature Detail will be posted on the ~~Interconnection~~ AT&T ~~W~~website. Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this ~~W~~website.		
Calculation	**Percent Service Order Accuracy** = (a / b) X 100 $\quad$ a = Number of service affecting fields with no errors on completed ~~O~~orders ~~completed without error~~ $\quad$ b = Number of service affecting fields on completed associated service ~~O~~orders ~~completed~~ within reporting period Rationale: Change calculation to provide a truer picture of service order accuracy by calculating the percentage of accuracy of all populated service affecting fields.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation SQM/~~SEEM~~ Analog/Benchmark 95% Accurate ~~95% Accurate~~ Rationale: Change disaggregation from Resale and UNE to one aggregated disaggregation of accurate service orders.		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes X...................X~~ Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan Eliminate Tier 2 remedies. Local market irreversibly open. Thirteen years since passage of 96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning
P-13B	LOOS	LNP-Percent Out of Service < 60 Minutes	

| SEEM Measure | SEEM Tier I Tier II
Yes...............X...........X

Rationale:

• Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan
• Eliminate Tier 2 remedies.
    o Local market irreversibly open.
    o Thirteen years since passage of 96 Telecom Act.
    o Tier 2 incentive to prevent backsliding no longer needed. | With new simple port interval will this metric need to be separated into simple and non-simple with different timers? This question should be applied to all the LNP metrics once LNPA recommendation is available. | **Parties Agree except for resolution of Tier-II elimination that is highlighted.**

Agreement is metric will remain "as is" and be subject to Tier I remedies. AT&T agrees to provide a new diagnostic disaggregation by simple and complex ports to be implemented congruent with the FCC simple/complex porting rules. |

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-13C	LAT	~~LNP-Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date~~ Rationale:		
~~Definition~~		~~This report measures the percentage of time BellSouth applies a 10-digit trigger for orders containing ported telephone numbers prior to the due date.~~		**Parties Agree to leave metric "as is" currently structured in the plan except for resolution of Tier-II elimination that is highlighted.**
~~Exclusions~~		• ~~Remote Call Forwarding, DIDs, and ISDN Data TNs~~ • ~~CLEC or customer caused misses or delays~~ • ~~Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders etc., which may be order types C, N, R or T)~~ • ~~Zero due dated expedited orders requested by the CLEC~~ • ~~Listing Orders~~ Rationale: • Eliminate metric to simplify plan • AT&T consistently provides high level of performance. • Performance for the past 12 months, June 08 through May 09, has exceeded 99% against a benchmark of >=95% for Florida.		
~~Business Rules~~		~~The number of LNP orders where the 10-digit trigger was applied prior to the due date, divided by the total number of LNP orders where the 10-digit trigger was applicable.~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~Calculation~~	~~Percentage of 10-Digit Trigger Applications = (a / b) X 100~~ • ~~a = Count of LNP orders for which a 10-digit trigger was applied prior to due date~~ • ~~b = Total LNP orders for which 10-digit triggers were applicable~~		
~~Report Structure~~	• ~~CLEC Specific~~ • ~~CLEC Aggregate~~ • ~~Geographic Scope~~ ~~State~~		
~~SQM Disaggregation Analog/Benchm ark~~	~~SQM Level of Disaggregation SQM/SEEM Analog/Benchmark~~ ~~LNP~~ ~~>=95%~~	SQM Level of Disaggregation SQM/SEEM Analog/Benchmark LNP >=~~95~~ <u>96.5</u>%	
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes................. X.............. X~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-13D	LDT	LNP-Disconnect Timeliness (Non-Trigger)		
Business Rules		Disconnect Timeliness is the elapsed time from when ~~BellSouth's~~AT&T receives a valid 'Number Ported' message ~~in ESI Number Manager~~ (signifying the CLEC 'activate') for each telephone number ported until each number is disconnected in the ~~BellSouth's~~AT&T switch. Non-business hours will be excluded from the duration calculation for unscheduled LNP ports. Rationale: Remove reference to ESI to allow flexibility in the event of future platform changes.		**Parties Agree to leave metric "as is" currently structured in the plan except for resolution of Tier-II elimination that is highlighted.**
SQM Disaggregation Analog/Benchmark			SQM Level of Disaggregation 　SQM/SEEM Analog/Benchmark 　LNP (Normal Working Hours and Approved After Hours) ~~95~~98% <= 4 Hours 　LNP (Unscheduled After Hours Ports)　　　　~~95~~98% <= 4 Hours (excluding non-business hours)	
~~SEEM Measure~~		~~SEEM　Tier I　Tier II~~ ~~Yes　X..................X~~ Rationale: 　Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan 　Eliminate Tier 2 remedies. 　Local market irreversibly open. 　Thirteen years since passage of 96 Telecom Act. 　Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Provisioning	
New		Average Time Required to Update 911 Database (Facility Based Providers)		

		Definition	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
		The average time it takes to update the 911 database file.	
		Exclusions	
		None	*CLECs agreed to withdraw request for this metric during workshop discussions regarding CLECs' response to Action Item No. 12.*
		Business Rules	
		The clock starts on the date/time when the data processing starts and the clock stops on the date/time when the data processing is complete.	
		Calculation	
		Σ(Date and time data processing begins – date and time data processing ends) ÷ total number of files	
		Report Structure	
		Reported for individual CLEC, all CLECs and AT&T.	
		SQM Disaggregation - Analog/Benchmark	
		SQM Level of Disaggregation	
		o None	
		Measurement Type	
		Tier 1 – Low	
		Tier 2 – None	
		Benchmark	
		Parity	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		SEEM Measure SEEM Tier I Tier II Yes......................X X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Provisioning
New		Percent Database Accuracy	

	Definition	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
	Measures the percentage of database updates completed without error reported for 911 Database.	
	Exclusions	
	CLEC Caused errors	*CLECs agreed to withdraw request for this metric during workshop discussions regarding CLECs' response to Action Item No. 12.*
	Business Rules	
	Any test transactions not submitted in connection with the pre-ordering, ordering, provisioning or maintenance of actual customers.	
	Notes: CLECs reserve the right to request additional databases be included in this measure.	
	. **Calculation**	
	((Count of Updates Completed without error) / (Count of Updates Completed)) x	
	100	
	Report Structure	
	Monthly from the E911 database, Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies) and by	
	ILEC Affiliates	
	SQM Disaggregation - Analog/Benchmark	
	None	
	SQM Level of Disaggregation	
	Measurement Type	
	Tier 1 – Low	
	Tier 2 – None	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		Benchmark Parity **SEEM Measure** **SEEM** **Tier I** **Tier II** Yes..................X X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Provisioning
New		911- Average Time to Clear Errors	

Definition The average time it takes to clear an error after it is detected during the processing of the 911 database file. This is only on resale or UNE loop and port combination orders that AT&T installs. **Exclusions** None **Business Rules** The clock starts upon the receipt of the error file and the clock stops when the error is corrected. **Calculation** Σ(Date and time error detected – date and time error cleared) ÷ total number of errors **Report Structure** Reported for CLEC, all CLECs and AT&T. **SQM Disaggregation - Analog/Benchmark** **SQM Level of Disaggregation** None **Measurement Type** Tier 1 – Low Tier 2 – None **Benchmark** Parity	**Area to be subject of PSC Workshop and ultimately staff recommendation.** *CLECs agreed to withdraw request for this metric during workshop discussions regarding CLECs' response to Action Item No. 12.*

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		SEEM Measure **SEEM** **Tier I** **Tier II** Yes......................X X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Provisioning	
New		Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs		

			Definition	**Parties agree for Florida only that CLECs withdraw request for this metric.**
			The percentage of DA database updates completed within 72 hours of receipt of the update from the CLEC for directory change only and within 72 hours of the completion date on the provisioning service order where a provisioning order is required.	
			Exclusions	
			Excludes Weekends and Holidays.	*CLECs agreed to withdraw request for this metric during workshop discussions regarding CLECs' response to Action Item No. 12.*
			Business Rules	
			The date and time stamp on fax updates starts the clock and the date and time when the listing is updated stops the clock. For directory changes that also have a provisioning order, the clock starts when the provisioning order completes and ends when the listing is updated. The update clerks work hours are 6:30 a.m. to 3:00 p.m. Monday through Friday. On requests received after 3:00 p.m. the clock will start at 6:30 a.m. the following day.	
			Calculation	
			(Count of updates completed within 72 hours ÷ total updates) * 100	
			Report Structure	
			Reported by CLEC and all CLECs for facility based providers.	
			SQM Disaggregation - Analog/Benchmark	
			SQM Level of Disaggregation	
			o 95% within 72 hours	
			o 95% within (X) hours (Diagnostic)	
			o 90% within (X) hours (Diagnostic)	
			Measurement Type	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		Tier 1 – Low Tier 2 – None **Benchmark** o 95% updated within 72 hours. Critical z-value does not apply. o Diagnostic – 95% within (X) Hours o Diagnostic – 90% within (X) Hours **SEEM Measure** **SEEM Tier I Tier II** Yes......................X X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#

Measure Category Code

Title of the Measure

New

Directory Assistance- Database Update Accuracy

Provisioning

Definition

Directory Assistance. For Directory Assistance updates completed during the reporting period, the update order that the CLEC sent to AT&T is compared to the Directory Assistance database following completion of the update by AT&T. An update is "completed without error" if the Directory Assistance database accurately reflects the new listing, listing deletion or listing modification, submitted by the CLEC.

Exclusions

None

Business Rules

This measurement will be performed using statistically valid samples.

Calculation

Numerator is the number of updates completed without error

Denominator is the total number of updates

Report Structure

State Specific with a CLEC specific report and a CLEC Aggregate report.

SQM Disaggregation - Analog/Benchmark

None

SQM Level of Disaggregation

None

Parties agree for Florida only that CLECs withdraw request for this metric.

CLECs agreed to withdraw request for this metric during workshop discussions regarding CLECs' response to Action Item No. 12.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		Measurement Type Tier 1 – Low Tier 2 – None **Benchmark** Parity **SEEM Measure** **SEEM Tier I Tier II** Yes......................X X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Provisioning	
New		**Percentage of Electronic Updates that Flow Through the DSR process Without Manual Intervention**		

		Definition	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
		Percentage of DSRs from entry to distribution that progress through AT&T ordering systems to ALPS/LIRA.	
		Exclusions	
		Rejected DSRs due to CLEC error.	*CLECs agreed to withdraw request for this metric during workshop discussions regarding CLECs' response to Action Item No. 12.*
		Business Rules	
		The number of DSRs, that flow through SWBT's ordering systems and are passed to ALPS/LIRA without manual intervention, divided by the total number of DSRs issued within the reporting period.	
		Calculation	
		(Number of DSRs that flow through to ALPS/LIRA ÷ Total DSRs) * 100	
		Report Structure	
		CLEC and All CLECs.	
		SQM Disaggregation - Analog/Benchmark	
		SQM Level of Disaggregation	
		None	
		Measurement Type	
		Tier 1 – Low	
		Tier 2 – None	
		Benchmark	
		97% Critical z-value does not apply.	
		SEEM Measure	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		SEEM Tier I Tier II Yes........................X X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair	
M&R-1	MRA	Percent Missed Repair Appointments		

Report Structure	Dispatch/Non-Dispatch (except trunks) CLEC Specific CLEC Aggregate ~~BellSouth~~ AT&T Aggregate Geographic Scope - State Rationale: Administrative update to correct omission in prior version		**Parties Agree except for resolution of Tier-II elimination that is highlighted.** **AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".**

SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation SQM ~~SEEM~~ Analog/Benchmark • Resale Residence (Non-Design) Retail Residence (Non-Design) • Resale Business (Non-Design) Retail Business (Non-Design) • Resale Design Retail Design • UNE Analog Loop (Design) Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops) • UNE Analog Loop (Non-Design) Retail Residence and Business - POTS (Excluding Switch Based Feature		*In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Troubles)		
	• UNE Digital Loop >= DS1 Retail Digital Loop >= DS1		
	• UNE EELs Retail DS1/DS3		
	• UNE xDSL (HDSL, ADSL, ~~and~~ UCL, <u>and Line Splitting</u>) ADSL Provided to Retail		
	• UNE ISDN/UDC/IDSL Retail ISDN – BRI		
	• ~~UNE Line Splitting~~ ~~ADSL Provided to Retail~~		
	• ~~UNE Other Design~~ ~~Diagnostic~~		
	• ~~UNE Other Non-Design~~ ~~Diagnostic~~		
	• Local Interconnection Trunks Direct comparison~~Parity~~ with Retail Trunks		
	Rationale:		
	• Combine DSL like services into a single disaggregation.		
	o Performance standard for both existing disaggregations are identical (retail analog is ADSL service).		
	o In Florida, no more than 14 CLEC missed appointments for UNE Line Splitting submeasure over the past 12 months. Combining this disaggregation with UNE xDSL will have minimal impact on reported results.		
	• Remove two Diagnostic disaggregations, UNE Other Design and UNE other Non-Design. AT&T has reported 17 CLEC missed appointments for these submeasures over that last 12 months, June 08 through May 09. In addition, with no applicable retail analogs for these submeasures, there is no substantive information being provided.		
	• Administrative change for clarity		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SEEM Measure	**SEEM Tier I Tier II**
	~~Yes X.....................X~~
	Rationale:
	    Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan
	    Eliminate Tier 2 remedies.
	    Local market irreversibly open.
	    Thirteen years since passage of 96 Telecom Act.
	    Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair		
M&R-2	CTRR	Customer Trouble Report Rate Net of Provisioning Trouble and Repeat Reports			
Definition	This report measures the percentage of customer troubles exclusive of provisioning and repeat trouble reports closed within a calendar month.	.	**Area for further negotiations by parties.**
Exclusions	Trouble tickets canceled at the CLEC request BellSouth AT&T trouble reports/lines associated with internal or administrative service Customer Provided Equipment (CPE) or CLEC Equipment Troubles Informational Tickets Provisioning trouble reports. A provisioning trouble report is defined as any report that comes in within "X" -calendar days of service order completion, where "X" is 5 days (POTS Non-Designed services) or 14 days (Designed services). Repeat trouble reports. A repeat trouble is defined as a customer report on the same line/circuit, received within 30 days of an original customer trouble report Troubles outside of BellSouth's AT&T's control -A cut or damaged cable, caused by other than BellSouth AT&T employees or contractors -Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth AT&T Rationale: Measure captures duplicative data reported in P-9, (PPT), Percent Provisioning Troubles within "X" Days of Service Order Completion and		**AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".** *AT&T provided new proposal as response to Action Item No. 16 for three measures (P-9, M&R-2, M&R-4).* *In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	M&R-4 (PRT) Percent Customer Troubles within 30 Calendar Days		
Business Rules	Customer Trouble Report Rate contains all closed customer and/or CLEC direct reports, net of provisioning and~~including~~ repeat reports, divided by the total "number of service" lines.		
Calculation	**Customer Trouble Report Rate** = (a / b) X 100 a = Count of ~~initial and repeated~~ customer trouble reports (net of provisioning and repeat trouble reports) closed in the current reporting period b = Number of lines in service at end of the reporting period		
Report Structure	Dispatch/Non-Dispatch (except trunks) CLEC Specific CLEC Aggregate ~~BellSouth~~ AT&T Aggregate Geographic Scope • State Rationale: Administrative update to correct omission in prior version		
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation** **SQM/~~SEEM~~ Analog/Benchmark** Resale Residence (Non-Design) Retail Residence (Non-Design) Resale Business (Non-Design) Retail Business (Non-Design) Resale Design Retail Design UNE Analog Loop (Design) Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops) UNE Analog Loop (Non-Design) Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles) UNE Digital Loop >= DS1 Retail Digital Loop >= DS1 UNE EELs Retail DS1/DS3 UNE xDSL (HDSL, ADSL, ~~and~~ UCL, and Line Splitting) ADSL Provided to Retail		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	UNE ISDN/UDC/IDSL Retail ISDN – BRI ~~UNE Line Splitting~~ ~~ADSL Provided to Retail~~ ~~UNE Other Design~~ ~~Diagnostic~~ ~~UNE Other Non-Design~~ ~~Diagnostic~~ Local Interconnection Trunks Direct comparison~~Parity~~ with Retail Trunks Rationale: Combine DSL like services into a single disaggregation. Performance standard for both existing disaggregations are identical (analog is retail ADSL service). The performance results for the combination of these submeasures will be consistent with the results of each submeasure separately. Combining this disaggregation with UNE xDSL will have minimal impact on reported results. Remove two Diagnostic disaggregations, UNE Other Design and UNE other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. Administrative change for clarity		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes .... X .... X~~ Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan Eliminate Tier 2 remedies. Local market irreversibly open. Thirteen years since passage of 96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair	
M&R-3	MAD	Maintenance Average Duration		

Report Structure	Dispatch/Non-Dispatch (except trunks)	Report Structure	**Area for further negotiations by parties.**
	Affecting Service/Out of Service (Non-Design only)	Report should reflect those tickets received electronically and those received via call to center to access impact of ebonding.	**AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".**
	CLEC Specific	• ......Dispatch/Non-Dispatch	
	CLEC Aggregate	• ......CLEC Specific	*In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*
	~~BellSouth~~AT&T Aggregate	• ......CLEC Aggregate	
	Geographic Scope	• ......BellSouth Aggregate	
		• ......Geographic Scope	
	Rationale:	State	
	Administrative update to correct omission in prior version		
	Propose changing reporting structure of Non-Design submeasure into Affecting Service (AS) and Out of Service (OOS).		
	AT&T Local Field Operations manages workload subject to AS and OOS conditions for Retail and Wholesale.		
	AS and OOS disaggregations will provide better Retail analog comparison.		

SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation	SQM/~~SEEM~~ Analog/Benchmark		
	Resale Residence (Non-Design) Residence (Non-Design)	Retail		
	Resale Business (Non-Design) (Non-Design)	Retail Business		
	Resale Design	Retail Design		
	UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail		
	UNE Analog Loop (Non-Design)	Retail		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Residence and Business - POTS (Excluding Switch Based Feature Troubles)		
	UNE Digital Loop >= DS1 Retail Digital Loop >= DS1		
	UNE EELs Retail DS1/DS3		
	UNE xDSL (HDSL, ADSL, ~~and~~ UCL, <u>and Line Splitting</u>) ADSL Provided to Retail		
	UNE ISDN/UDC/IDSL Retail ISDN – BRI		
	~~UNE Line Splitting ADSL Provided to Retail~~		
	~~UNE Other Design Diagnostic~~		
	~~UNE Other Non-Design Diagnostic~~		
	Local Interconnection Trunks Direct comparison~~Parity~~ with Retail Trunks		
	Rationale:		
	Combine DSL like services into a single disaggregation.		
	Performance standard for both existing disaggregations are identical (analog is retail ADSL service).		
	The performance results for the combination of these submeasures will be consistent with the results of each submeasure separately. Combining this disaggregation with UNE xDSL will have minimal impact on reported results.		
	Remove two Diagnostic disaggregations, UNE Other Design and UNE other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.		
	Administrative change for clarity		
SEEM Measure	SEEM Tier I Tier II Yes.........................X...............X		
	Rationale:		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan Eliminate Tier 2 remedies. Local market irreversibly open. Thirteen years since passage of 96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair
M&R-4	PRT	Percent Repeat Customer Troubles within 30 Calendar Days	

Business Rules		Business Rules Customer trouble reports considered for this measure are those on the same line/circuit, received within 30 calendar days of an original customer trouble report. Candidates for this measure are determined by using either the 'cleared date' from LMOS or the 'closed date' from WFA of the first trouble, and the 'received date' of the next trouble. Should the measure be from ACTS, EBTA, CPSS, is WFA correct place to measure and if yes why?	**Parties Agree except for resolution of Tier-II elimination that is highlighted.** **AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison". CLECs agree to all other proposed changes by AT&T except for Tier-II elimination.**
Report Structure	▲ patch/Non-Dispatch (except trunks) EC Specific EC Aggregate South AT&T Aggregate ographic Scope - State Rationale: Administrative update to correct omission in prior version		*In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation** **SQM/SEEM Analog/Benchmark** • Resale Residence (Non-Design) Retail Residence (Non-Design) • Resale Business (Non-Design) Retail Business (Non-		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Design)		

Design)

- Resale Design   Retail Design

- UNE Analog Loop (Design)   Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)

- UNE Analog Loop (Non-Design)   Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)

- UNE Digital Loop >= DS1   Retail Digital Loop >= DS1

- UNE EELs   Retail DS1/DS3

- UNE xDSL (HDSL, ADSL, ~~and~~ UCL, and Line Splitting)   ADSL Provided to Retail

- UNE ISDN/UDC/IDSL   Retail ISDN – BRI

- ~~UNE Line Splitting~~   ~~ADSL Provided to Retail~~

- ~~UNE Other Design~~   ~~Diagnostic~~

- ~~UNE Other Non-Design~~   ~~Diagnostic~~

- Local Interconnection Trunks   Direct comparison~~Parity~~ with Retail Trunks

Rationale:

    Combine DSL like services into a single disaggregation.

    Performance standard for both existing disaggregations are identical (analog is retail ADSL service).

    AT&T has reported less than 20 CLEC repeat trouble reports over that last 12 months, June 08 through May 09, for the Line Splitting submeasure. The performance results for the combination of these submeasures will be consistent with the results of each submeasure separately. Combining this disaggregation with UNE xDSL will have minimal impact on reported results.

    Remove two Diagnostic disaggregations, UNE Other Design and UNE other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.

    Administrative change for clarity

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	SEEM ~~Tier I~~ ~~Tier II~~ ~~Yes......................X.............X~~ Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan • Eliminate Tier 2 remedies. • Local markets irreversibly open. • Thirteen years since passage of 96 Telecom Act. • Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair
M& R-5	OOS	Out of Service (OOS) > 24 Clock Hours	

Business Rules		Customer trouble reports that are out of service and cleared in excess of 24 clock hours. The clock starts when the customer trouble report is created in LMOS/WFA and is counted if the elapsed time exceeds 24 clock hours. Should ACTS, EBTA, CPSS be used?	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
Report Structure	Dispatch/Non-Dispatch (except trunks) CLEC Specific CLEC Aggregate ~~BellSouth~~AT&T Aggregate Geographic Scope - State Rationale: Administrative change to correct omission in prior version		**AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".**
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation SQM/~~SEEM~~ Analog/Benchmark Resale Residence (Non-Design)..................Retail Residence (Non-Design) Resale Business (Non-Design)...................Retail Business (Non-Design) Resale Design ....Retail Design UNE Analog Loop (Design) ....Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops) UNE Analog Loop (Non–Design).............Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles) UNE Digital Loop >= DS1 ....Retail Digital Loop >= DS1 UNE EELS ....Retail DS1/DS3		*Except as noted in the following, parties agreed to AT&T proposed changes except for elimination of Tier-1 remedies.* *In response to CLECs' Action Item No. 9, AT&T agreed to keep the Level of Disaggregations for UNE Other Design and UNE Other Non-Design. The parties agreed with combining the UNE Line Splitting Level of Disaggregation with UNE xDSL.*

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	UNE xDSL (HDSL, ADSL, ~~and~~ UCL, and Line Splitting) ADSL provided to Retail UNE ISDN/UDC/IDSL ....Retail ISDN – BRI ~~UNE Line Splitting...ADSL Provided to Retail~~ ~~UNE Other Design ....Diagnostic~~ ~~UNE Other Non-Design ....Diagnostic~~ Local Interconnection Trunks ....Direct comparison~~Parity~~ with Retail Trunks Rationale: Combine DSL like services into a single disaggregation. Performance standard for both existing disaggregations are identical (analog is retail ADSL service). AT&T has reported only one CLEC transaction for the UNE Line Splitting submeasure for at least the last 12 months, June 08 through May 09. Combining this disaggregation will have no impact on reported results. Remove two Diagnostic disaggregations, UNE Other Design and UNE other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. Administrative change for clarity		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes X X~~ Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan • Eliminate Tier I remedies. ○ Data captured by OOS is a duplicate of data captured by M&R-3		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	(MAD), Maintenance average Duration. • Eliminate Tier 2 remedies. • Local market irreversibly open. • Thirteen years since passage of 96 Telecom Act. • Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair		
M&R-6	MAAT	Average Answer Time – Repair Centers			
SQM Disaggregation - Analog/Benchmark	**SQM Level of Disaggregation** **SQM Analog/Benchmark** ~~BellSouth~~Direct comparison with AT&T Average Answer Time			**Parties Agree to leave metric "as is" currently structured in the plan with the administrative change of AT&T where BellSouth currently appears.**	
~~SEEM Measure~~	SEEM...............Tier I..........Tier II No.. Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan				

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Billing	
B-1	BIA	Invoice Accuracy		
Definition	This measure reports the accuracy of billing invoices rendered by BellSouth to wholesale and retail customers.		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *CLECs accepted AT&T's proposal in their response to Action Item No 18 to leave all Billing metrics as is currently structured. It was clarified during workshop discussion that this applied to both the SQM and the SEEM Plan.*
	Rationale:		
	Eliminate administrative requirement to simplify plan		
	Billing measurements for rendering bills to the CLEC do not measure performance that impacts the CLEC customers		
	There are current processes in place for dealing with invoice disputes on a business-to-business basis. Processes are provided within the Billing Section of the CLEC Handbook at https://clec.att.com/clec/.		
Exclusions	• Adjustments not related to billing errors (e.g., credits for service outage, special promotion credits, adjustments to satisfy the customer, adjustments as per agreements and/or settlements with CLEC, adjustments related to the implementation of regulatory mandated or contract negotiated rate changes)		
	Test Accounts		
Business Rules	Absolute value of total billed revenue and absolute value of adjustment amounts related to billing errors and manual OC & C's (Other Charges and Credits) indicative of back-billing errors or manual back-billing greater than 3 bill periods appearing on the bill during the report month are used to compute invoice accuracy. All bill periods are included in a report month.		
Calculation	Invoice Accuracy = [(a – b) / a] X 100		
	a = Absolute value of total billed revenues during data month		
	b = Absolute value of total billing error related adjustments entered		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~during data month~~		
~~Report Structure~~	• ~~CLEC Specific~~ • ~~CLEC Aggregate~~ • ~~BellSouth Aggregate~~ • ~~Geographic Scope~~ • ~~State~~ • ~~Number of Adjustments~~		
~~SQM Disaggregation Analog/Benchmark~~	~~SQM Level of Disaggregation~~ ~~SQM/SEEM Analog/Benchmark~~ ~~CLEC Invoice Accuracy~~ ~~Resale Retail Invoice Accuracy~~ ~~UNE Retail Invoice Accuracy~~ ~~Interconnection~~ ~~Retail Invoice Accuracy~~		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ .... ~~Yes X X~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Billing	
B-2	BIT	Mean Time to Deliver Invoices		

SQM Section	AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale	
Definition	This report measures the mean interval for timeliness of billing invoices delivered to USPS (US Postal Service) or transmitted to the customer in an agreed upon format. Rationale: Eliminate administrative requirement to simplify plan Billing measurements for rendering bills to the CLEC do not measure performance that impacts the CLEC customers There are current processes in place for dealing with invoice disputes on a business-to-business basis. Processes are provided within the Billing Section of the CLEC Handbook at https://clec.att.com/clec/ .		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *CLECs accepted AT&T's proposal in their response to Action Item No 18 to leave all Billing metrics as is currently structured. It was clarified during workshop discussion that this applied to both the SQM and the SEEM Plan.*
Exclusions	None		
Business Rules	Invoice timeliness is determined by calculating the interval between the bill period date and actual transmission or distribution of the invoice. To determine the number of workdays, begin counting the bill period date as the first workday (or the next workday if the bill period date is a weekend or holiday). The invoice transmission date is counted as the last workday. Invoice transmission date is the workday the invoice is delivered to the Post Office or transmitted to the customer. CLEC bills and BellSouth bills transmitted in less than or equal to one day difference will be considered parity.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	Invoice Timeliness = (a - b) • a = Invoice Transmission Date • b = Bill Cycle Period Date Mean Time to Deliver Invoices = (c / d) • c = Sum of all invoice timeliness intervals • d = Count of invoices transmitted in reporting period		
Report Structure	• CLEC Specific • CLEC Aggregate • BellSouth Aggregate • Geographic Scope State		
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation SQM/SEEM Analog/Benchmark The average delivery intervals are compared as follows: • Resale CRIS Retail CRIS • UNE CRIS Retail CRIS • Interconnection UNE CABS Retail CABS		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes X .... X~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Billing	
B-5	BUDT	Usage Data Delivery Timeliness		
Definition	This report measures recorded usage data that is delivered to the appropriate CLEC within six (6) calendar days from the receipt of the initial recording. Rationale: Eliminate administrative requirement to simplify plan Billing measurements for rendering bills to the CLEC do not measure performance that impacts the CLEC customers There are current processes in place for dealing with invoice disputes on a business-to-business basis. Processes are provided within the Billing Section of the CLEC Handbook at https://clec.att.com/clec/.		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *CLECs accepted AT&T's proposal in their response to Action Item No 18 to leave all Billing metrics as is currently structured. It was clarified during workshop discussion that this applied to both the SQM and the SEEM Plan.*
Exclusions	None		
Business Rules	The timeliness interval of usage recorded by other companies is measured from the date BellSouth receives the records to the date BellSouth distributes to the CLEC. Method of delivery is at the option of the CLEC.		
Calculation	Usage Data Delivery Timeliness Current Month = (a / b) X 100 Total number of usage records sent within six (6) calendar days from initial recording/receipt b = Total number of usage records sent during the reporting period		
Report Structure	CLEC Aggregate CLEC Specific Geographic Scope		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~SQM Level of Disaggregation – Analog/Benchmark~~	~~SQM Level of Disaggregation~~ ~~SQM/SEEM Analog/Benchmark~~ ~~Usage Data Delivery Timeliness~~ ~~>= 95% in Six Calendar Days~~	SQM Level of Disaggregation - Analog/Benchmark SQM Level of Disaggregation SQM/SEEM Analog/Benchmark • Usage Data Delivery Timeliness .... >= 95~~7~~% in Six Calendar Days	
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes X .... X~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Billing	
~~B-10~~	~~BEC~~	~~Percent Billing Adjustment Requests (BAR) Responded to within 40 Business Days~~	Percent Billing Adjustment Requests (BAR) Responded to within 25 ~~40~~ Business Days	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
~~Definition~~	~~This report measures timely responses to carrier bill adjustment requests~~ Rationale: • Eliminate administrative requirement to simplify plan • Billing measurements for rendering bills to the CLEC do not measure performance that impacts the CLEC customers • There are current processes in place for dealing with invoice disputes on a business to business basis. Processes are provided within the Billing Section of the CLEC Handbook at https://clec.att.com/clec/.			*CLECs accepted AT&T's proposal in their response to Action Item No 18 to leave all Billing metrics as is currently structured. It was clarified during workshop discussion that this applied to both the SQM and the SEEM Plan.*
~~Exclusions~~	~~Adjustments initiated by BellSouth~~	Adjustments initiated by BellSouth IXC Access billing adjustment		
~~Business Rules~~	~~This measure applies to CLEC wholesale bill adjustment requests. IXC Access billing adjustment requests are not reflected in this measure. Elapsed time is measured in business days. The clock starts when BellSouth receives the CLEC Billing Adjustment Request (BAR) form and the clock stops when BellSouth either makes an adjustment through BOCRIS or ACATS (generally next CLEC bill unless adjustment request after middle of the month) or BellSouth denies the request in BDATS or ACATS, WebTAXI and BellSouth notifies the CLEC of the BAR request resolution. BellSouth will report separately those adjustment requests that are disputed by BellSouth. (BAR form and instructions are found at www.interconnection.bellsouth.com/forms/html/billing&collections.html)~~	Business Rules This measure applies to CLEC wholesale bill adjustment requests. ~~IXC Access billing adjustment requests are not reflected in this measure.~~ Elapsed time is measured in business days. The clock starts when BellSouth receives the CLEC Billing Adjustment Request (BAR) form and the clock stops when BellSouth either makes an adjustment through BOCRIS or ACATS (generally next CLEC bill unless adjustment request after middle of the month) or BellSouth denies the request in BDATS or ACATS and BellSouth notifies the CLEC of the BAR resolution. BellSouth will report separately those adjustment requests that are disputed by BellSouth. (BAR form and instructions are found at www.interconnection.bellsouth.com/forms/html/billing&collections.html) . Should this language be changed to include ExClaim?		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	~~Percent Billing Adjustments Responded to within 40 Business Days =~~ ~~(a / b) X 100~~ ~~a = Total number of BAR requests received in the data month that were responded to in 40 business days~~ ~~b = Total number of BAR requests received in the data month~~	**Percent Billing Adjustments Responded to within <u>25</u> ~~40~~ Business Days** = (a / b) X 100 a = <u>Total</u> number of BAR requests received in the data month that were responded to in ~~40~~ <u>25</u> business days b = Total number of BAR requests received in the data month	
Report Structure	~~CLEC Specific~~ ~~CLEC Aggregate~~ ~~Geographic Scope~~ ~~State~~		
SQM Disaggregation – Analog/Benchmark	~~SQM Level of Disaggregation~~ ~~SQM/SEEM Analog/Benchmark~~ ~~Percent Billing Adjustment Requests responded to ....95% <=~~ ~~40 business days~~	SQM Disaggregation - Analog/Benchmark SQM Level of Disaggregation SQM/SEEM Analog/Benchmark • Percent Billing Adjustment Requests responded to ....95% <= <u>25</u> ~~40~~ business days	
SEEM Measure	~~SEEM Tier I Tier II~~ ~~Yes X..................... X~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQ M#	Measure Category Code	Title of the Measure	Trunk Group Performance		
TG P-1	TGP	Trunk Group Performance			

SQM Section	AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale	
Definition	This report displays Trunk Group blocking performance for both BellSouth and CLECs. Percentage of calls blocked on outgoing traffic for alternate final and direct final trunk groups from AT&T end office to CLEC end office and from AT&T Tandem to CLEC end office. Rationale: Measuring the percentage of blocked calls caused by AT&T will provide the correct method to report AT&T's impact to the end user experience The AT&T Trunk Planning and Engineering Group performs a common Trunk Group monitoring, planning, and analysis for all trunk groups. Modification required for this measure will ensure alignment of treatment for these activities within this common resource The recommended changes for this measure have been successfully implemented within other AT&T regions This measure has been met for the last 12 months of data, from June 2008 to May 2009.		**Parties Agree to AT&T's proposed changes except for resolution of Tier-II elimination that is highlighted.**
Exclusions	• Trunk groups blocked due to unanticipated significant increases in CLEC traffic (An unanticipated, significant increase in traffic is indicated by a 20% increase for small trunk groups or 1800 CCS for large groups over the previous month's traffic when the increase was not forecasted by the CLEC.) • Orders delayed or refused by CLEC • Trunk groups for which valid data is not available for an entire reporting period • Duplicate trunk group information	In Exclusions, trunk groups for which valid data is not available for an entire reporting period is mentioned. What are some examples of when data becomes invalid?	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	• Trunk groups blocked due to CLEC network/equipment failure		
	• Final groups actually overflowing, not blocked		
	• Excludes Weekends and Holidays		
	• CLECs have trunks busied-out for maintenance at their end, or have other network problems that are under their control.		
	• Blocking caused by unplanned load on a CLECs network		
	• AT&T is ready for turn-up on Due Date and CLEC is not ready or not available for turn-up of trunks, e.g. not ready to accept traffic from AT&T on the due date or CLEC has no facilities or equipment at CLEC end.		
	• CLEC does not take action upon receipt of Trunk Group Service Request (TGSR) or ASR within 3 business days (day 0 is the business day the TGSR is emailed/faxed to the CLEC) when a Call Blocking situation is identified by AT&T or in the timeframe specified in the InterConnection Agreement (ICA).		
	• If CLEC does not take action upon receipt of TGSR within 10 business days (day 0 as described above) when a pre-service of 75% or greater occupancy situation is identified by AT&T or in the time frame specified in the ICA.		
	• If CLEC fails to provide a forecast within the last six months unless a different timeframe is specified in an interconnection agreement.		
	• If a CLEC's actual trunk usage as shown by AT&T from traffic usage studies is more than 25% above the CLEC's most recent forecast which must have been provided within the last six months.		
	• New trunk groups that have not been in service for three months may be excluded from calculations for that 3-month period. Nevertheless, utilization data will be gathered upon the turn-up of the trunk group.		
	The exclusions do not apply if AT&T fails to timely provide CLEC with traffic utilization data reasonably required for CLEC to develop its forecast or if AT&T refuses to accept CLEC trunk orders (ASRs or TGSRs) that are within the CLEC's reasonable forecast regardless of the current usage data.		
	• Provide a realistic view of the source of blocking to accurately measure customer service provided by AT&T.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	Twenty days of data consisting of blocked calls and total calls are collected, aggregated, and reported. ~~The purpose of the Trunk Group Performance report is to provide trunk blocking measurements on CLEC and BellSouth trunk groups for comparison only. It is not the intent of the report that it be used for network management and/or engineering.~~ ~~**Monthly Average Blocking:**~~ ~~The reporting cycle includes both business and non-business days in a calendar month.~~ ~~Monthly average blocking values are calculated for each trunk group for each of the 24 time-consistent hours across a reporting cycle~~ ~~**Aggregate Monthly Blocking:**~~ ~~Used to compare aggregate blocking across trunk groups which terminate traffic at CLEC points of presence versus BellSouth switches~~ ~~Aggregate monthly blocking data is calculated for each hour of the day across all trunk groups assigned to a category.~~ ~~**Trunk Categorization:**~~ ~~This report displays, over a reporting cycle, aggregate, average blocking data for each hour of a day. Therefore, for each reporting cycle, 24 blocking data points are generated for two aggregate groups of selected trunk groups. These groups are CLEC affecting and BellSouth affecting trunk groups. In order to assign trunk groups to each aggregate group, all trunk groups are first assigned to a category. A trunk group's end points and the type of traffic that is transmitted on it define a category. Selected categories of trunk groups are assigned to the aggregate groups so that trunk reports can be generated. The categories to which trunk groups have been assigned for this report are as follows:~~ ~~**CLEC Affecting Categories:**~~ ~~Point A————————————————————————Poin~~ ~~Category 1:...BellSouth I~~ ~~Category 3:...BellSouth I~~ ~~Category 4:..BellSouth Lo~~ ~~Category 5:...BellSouth Ac~~ ~~Category 10:...BellSouth I~~ ~~Category 16:..BellSouth~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~BellSouth Affecting Categories:~~ ~~Point A Poin~~ ~~Category 1:...BellSouth~~ ~~Category 9:...BellSouth~~ ~~Category 10:..BellSouth~~ ~~Category 16:..BellSouth~~		
Calculation	~~Monthly Average Blocking:~~ ~~• For each hour of the day, each day's raw data are summed across all valid measurement days in a report cycle for blocked and attempted calls.~~ ~~• The sum of the blocked calls is divided by the total number of calls attempted in a reporting period.~~ ~~Aggregate Monthly Blocking:~~ ~~• For each hour of the day, the monthly sums of the blocked and attempted calls from each trunk group are separately aggregated over all trunk groups within each assigned category.~~ ~~• The total blocked calls is divided by the total call attempts within a group to calculate an aggregate monthly blocking for each assigned group.~~ ~~• The result is an aggregate monthly average blocking value for each of the 24 hours by group.~~ ~~• The difference between the CLEC and BellSouth affecting trunk groups are also calculated for each hour.~~ **Percent Blocked Calls** = $(\{a - b\} \div \{c - b\}) * 100$ a = count of blocked calls b = excluded blocked calls c = total calls offered are engineered from a time consistent busy hour, not hourly data.		
Report Structure	CLEC Specific CLEC Aggregate ~~BellSouth Aggregate~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Geographic Scope State Proposal is to change this measure to a Benchmark result, therefore AT&T Aggregate data is no long applicable.		
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation** **SQM/SEEM Analog/Benchmark** —CLEC Aggregate and CLEC Specific — BellSouth Aggregate Any 2 consecutive hours in a 24 hour period where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10 (where CLEC uses that Trunk Group) and 16 for CLECs and 1, 9, 10 (where BellSouth uses that Trunk Group) and 16 for BellSouth AT&T end office to CLEC end office Blocked Calls on Dedicated Trunk Groups not to exceed blocking standard of B.01. [B.01 standard is 1%] AT&T tandem to end office trunk Blocked Calls on Dedicated Trunk Groups not to exceed blocking standard of B.01. [B.01 standard is 1%] Standardize and streamline the blocking metric across the 22 states to accurately measure blocking impact and simplify the process of reporting CLEC blocking.		
SEEM Measure	SEEM Tier I Tier II Yes X.................... X • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan • Eliminate Tier 2 remedies. o Local market irreversibly open. o Thirteen years since passage of 96 Telecom Act. o Tier 2 incentive to prevent backsliding no longer needed.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Collocation	
C-1	ART	Collocation Average Response Time		

Definition	This report measures the time it takes BellSouth to respond to the receipt of a complete and accurate collocation application. BellSouth must respond as to whether or not space is available within the required number of calendar days after having received a bona fide application for collocation. Rationale: • Eliminate metric to simplify plan. • AT&T consistently provides a high level of performance. • Performance for past 12 months (June 2008 to May 2009) was 100% meeting target level for all levels of disaggregation. • Key service affecting metric is C-3 (MDD), Collocation Percent of Due Dates Missed.		**Parties Agree to keep metric "as is" currently structured in the plan.**
Exclusions	• Any application canceled by the CLEC		
Business Rules	The interval begins on the date BellSouth receives a complete and accurate collocation application accompanied by the appropriate application fee if required. The interval stops on the date BellSouth returns a response. The interval will restart upon receipt of changes to the original application request.		
Calculation	Response Time = (a – b) a = Request Response Date b = Request Submission Date Average Response Time = (c / d) c = Sum of all response times d = Count of responses returned within the reporting period		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~Report Structure~~	~~— CLEC Specific~~ ~~— CLEC Aggregate~~ ~~— Geographic Scope~~ e		

~~SQM Disaggregation Analog/Benchm ark~~	~~SQM Level of Disaggregation~~ ~~SQM~~
	 ~~Analog/Benchmark~~
	 ~~— Virtual Initial~~ ~~15 Calendar Days~~
	 ~~— Virtual Augment~~ ~~15 Calendar Days~~
	 ~~— Physical Caged Initial~~ ~~15 Calendar Days~~
	 ~~— Physical Caged Augment~~ ~~15 Calendar Days~~
	 ~~— Physical Cageless Initial~~ ~~15 Calendar Days~~
	 ~~— Physical Cageless Augment~~ ~~15 Calendar Days~~
		gregation - Analog/Benchmark
		
		 SQM Level of Disaggregation
		    SQM Analog/Benchmark
		
		    Virtual-Initial ~~15~~ 7Calendar Days
		    Virtual-Augment ~~15~~ 7Calendar Days
		    Physical Caged-Initial ~~15~~ 7 Calendar Days
		    Physical Caged Augment ~~15~~ 7Calendar Days
		    Physical Cageless-Initial ~~15~~ 7Calendar Days
		    Physical Cageless-Augment ~~15~~ 7Calendar Days	

~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~No~~	sure SEEM Tier I Tier II ~~No~~ YES ....X...............	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Collocation	
C-2	AT	Collocation Average Arrangement Time		
Definition		This report measures the average time (in calendar days) for provisioning a collocation arrangement. Rationale: Eliminate metric to simplify plan. AT&T consistently provides a high level of performance. Performance for past 12 months (June 2008 to May 2009) was 100% meeting target level for all levels of disaggregation. Key service affecting metric is C-3 (MDD), Collocation Percent of Due Dates Missed.		**Parties Agree to keep metric "as is" currently structured in the plan.**
Exclusions		• Any bona fide firm order canceled by the CLEC • Any bona fide firm order with a CLEC negotiated interval longer than the benchmark interval		
Business Rules		The interval (in calendar days) for collocation arrangements begins on the date that BellSouth receives a complete and accurate bona fide firm order accompanied by the appropriate fee, if required, and ends on the date that BellSouth completes the collocation arrangement and notifies the CLEC.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	**Arrangement Time = (a - b)** • a = Date collocation arrangement is complete • b = Date order for collocation arrangement submitted **Average Arrangement Time = (c / d)** • c = Sum of all arrangement times • d = Total number of collocation arrangements completed during reporting period		
Report Structure	• CLEC Specific • CLEC Aggregate • Geographic Scope • State		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation Analog/Benchmark	~~SQM Level of Disaggregation SQM Analog/Benchmark~~ ~~Virtual-Initial~~ ~~60 Calendar Days~~ ~~Virtual Augment (without space increase)~~ ~~60 Calendar Days~~ ~~Virtual Augment (with space increase)~~ ~~60 Calendar Days~~ ~~Physical Caged-Initial~~ ~~90 Calendar Days~~ ~~Physical Caged-Augment (without space increase)~~ ~~45 Calendar Days~~ ~~Physical Caged-Augment (with space increase)~~ ~~90 Calendar Days~~ ~~Physical Cageless-Initial~~ ~~90 Calendar Days~~ ~~Physical Cageless-Augment (without space increase)~~ ~~45 Calendar Days~~ ~~Physical Cageless-Augment (with space increase)~~ ~~90 Calendar Days~~	SQM Disaggregation - Analog/Benchmark SQM Level of Disaggregation SQM Analog/Benchmark • Virtual-Initial ~~60~~50 30Calendar Days • Virtual Augment (without space increase) ~~6045~~ 30 Calendar Days • Virtual-Augment (with space increase) ~~6045~~ 30 Calendar Days • Physical Caged-Initial ~~9076~~ 45Calendar Days • Physical Caged-Augment (without space increase) ~~45~~ 24 Calendar Days • Physical Caged-Augment (with space increase) ~~9076~~ 24Calendar Days • Physical Cageless-Initial ~~90~~ 60 Calendar Days • Physical Cageless-Augment (without space increase)............... ~~45~~ 24 Calendar Days • Physical Cageless-Augment (with space increase) ~~9060~~ 45Calendar Days	
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~No...~~	sure SEEM Tier I Tier II ~~No~~Yes ....X...............	

Comment [A3]: We would also like a new benchmark formula to be used, specifically one that does not average out all customers. We would like one that includes a < or > formula.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Collocation		
C-3	MDD	Collocation Percent of Due Dates Missed			

SEEM Measure	SEEM Tier I Tier II Yes .... X .... X Rationale: Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan Eliminate Tier 2 remedies. Local markets irreversibly open. Thirteen years since passage of '96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed.		**Parties Agree to keep metric "as is" currently structured in the plan except for resolution of Tier-II elimination that is highlighted.**

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	Change Management	
~~CM-1~~	~~N/I~~	~~Timeliness of Change Management Notices~~		
~~Definition~~	~~This report measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.~~ ~~Eliminate metric to simplify plan.~~ ~~AT&T consistently provides a high level of performance. This regional measure was made for the last 12 months, June 2008 to May 2009.~~ ~~Measures a process that does not have direct, significant impact on CLECs and end users.~~	This report measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. The Accessible Letter communicates the CR being corrected in either a major or minor release. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.	**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
~~Exclusions~~	~~• Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes (for example: a patch to fix a software problem)~~ ~~• Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP)~~	Exclusions ~~• Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes (for example: a patch to fix a software problem)~~ • Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP)	
~~Business Rules~~	~~The interval begins on the notification date and ends on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. A revised notification would be required and the interval would restart. Based on release constraints for defects/expedites, notification may be less than the agreed upon interval in the CCP for new features.~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~Calculation~~	~~Timeliness of Change Management Notices = (a / b) X 100~~ ~~a = Total number of Change Management Notifications sent within required timeframes~~ ~~b = Total number of Change Management Notifications sent~~		
~~Report Structure~~	• ~~BellSouth Aggregate~~ • ~~Geographic Scope~~ ~~Region~~		
~~SQM Disaggregation Analog/Benchmark~~	~~SQM Level of Disaggregation~~ ~~SQM Analog/Benchmark~~ ~~Notices~~ ~~98% on time~~		
~~SEEM Measure~~	~~SEEM~~ ~~Tier I~~ ~~Tier II~~ ~~Yes..................................X~~	sure SEEM Tier I Tier II Yes.............................X.............X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Change Management

SQM#	Measure Category Code	Title of the Measure		
CM-3	DT	~~Timeliness of Documentation Associated with Change~~		
~~Definition~~	~~This report measures whether CLECs received requirements or business rule documentation on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.~~ ~~Rationale:~~ • ~~Eliminate metric to simplify plan.~~ • ~~AT&T consistently provides a high level of performance. The percentage of documentation sent on time benchmark of 98% was exceeded (100%) for June 2008 to May 2009~~ • ~~Measures a process that does not have direct, significant impact on CLECs and end users.~~		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
~~Exclusions~~	• ~~Documentation for release dates that slip less than 30 days for a change mandated by regulatory or legal entities (Federal Communications Commission [FCC], a state commission/authority, or state and federal courts) or CLEC request~~ • ~~Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	The interval begins on the date the business rule documentation is released and ends on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. Revisions to documentation could be required and the interval would restart. Documentation standards and timeframes can be found in the Change Control Process, on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.htm l)		
Calculation	Timeliness of Documentation Associated with Change = (a / b) X 100 • a = Change Management documentation sent within required timeframes after notices • b = Total number of Change Management documentation sent		
Report Structure	• BellSouth Aggregate • Geographic Scope Region		
SQM Disaggregation Analog/Benchm ark	SQM Level of Disaggregation SQM Analog/Benchmark • Documentation 98% on Time		
SEEM Measure	SEEM Tier I Tier II Yes......................................X	sure SEEM Tier I Tier II Yes............................X..............X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure	**Change Management**	
CM-5	ION	Notification of CLEC Interface Outages		

Definition	This report measures the time it takes BellSouth to notify the CLECs of an interface outage as defined by the Change Control Process (CCP) documentation. Rationale: • Eliminate metric to simplify plan. • AT&T consistently provides a high level of performance. • Performance for past 12 months from June 2008 to May 2009 has been 100% against a benchmark of 97% <= 15 Minutes. • OSS-2 (IA) OSS Interface Availability captures interface availability.		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
Exclusions	None		
Business Rules	BellSouth has 15 minutes to notify the CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur: 1. BellSouth can duplicate a CLEC reported system error. 2. BellSouth finds an error message within the error log that identically matches a CLEC reported system outage. 3. When three or more CLECs report the identical type of outage. 4. BellSouth detects a problem due to the loss of functionality for users of a system. The 15-minute interval begins once a CLEC reported outage or a BellSouth detected outage has lasted for 20 minutes and has been verified. If the outage is not verified within 20 minutes, the interval begins at the point of verification.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~Calculation~~	~~Notification of CLEC Interface Outages~~		
~~Report Structure~~	• ~~CLEC Aggregate~~ • ~~Geographic Scope~~ ~~Region~~		
~~SQM Disaggregation-Analog/Benchmark~~	~~SQM Level of Disaggregation SQM Analog/Benchmark~~ • ~~By interface type for all interfaces accessed by CLECs~~ ~~97% <= 15 Minutes~~ ~~Interface Applicable to~~ ~~EDI CLEC~~ ~~CSOTS CLEC~~ ~~LENSCLEC~~ ~~TAG CLEC~~ ~~ECTA CLEC~~ ~~TAFI CLEC/BellSouth~~	SQM Disaggregation - Analog/Benchmark SQM Level of Disaggregation SQM Analog/Benchmark • By interface type for all interfaces accessed by CLECs 97% <= 15 Minutes Interface Applicable to EDI CLEC CSOTS CLEC LENS CLEC TAG CLEC ECTA CLEC TAFI CLEC/BellSouth LASR..........CLEC XML.......... CLEC ACTS..........CLEC EBTA·CPSS...CLEC LEX.............CLEC Verigate.........CLEC	
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~No...~~	SEEM Measure SEEM Tier I Tier II ~~No~~Yes ....X................	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM#	Measure Category Code	Title of the Measure
CM-6	SEC	Percentage of Software Errors Corrected in "X" Business Days

Change Management

Definition	This report measures the percentage of all ~~outstanding~~ met or overdue software errors, ~~due and~~ ~~overdue, to be~~ corrected by ~~BellSouth~~ AT&T in "X" business days within the report period. Verbiage updated for clarity		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
Exclusions		**Exclusions** ~~Software corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs~~ • Rejected or reclassified software errors (BellSouth must report the number of rejected or reclassified software errors disputed by the CLECs)	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	For corrected software errors, ~~T~~the interval begins when a Software Error is validated per the Change Control Process (CCP) and ends when the error ~~is corrected and the~~ notice is posted as implemented to the change control website. Additionally, all outstanding software errors not corrected within their standard interval will be included in the total measurement base. ~~Currently "X" business days is defined in the CCP as 10 = Severity 2, 30 = Severity 3, and 45 = Severity 4.~~ The ~~current~~ standard intervals for this measure will be consistent with the intervals set in the CCP if agreed to by the CLEC or ordered by the Commission. The standard intervals established in the CCP currently are: Severity 2=10 days, Severity 3 =30 days, and Severity 4= 45 days. A copy of the most current CCP can be found on the ~~Interconnection~~ AT&T website ~~(http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html) The monthly report should include all defects, due and overdue, to be corrected within the report period.~~ Software defects are defined as Type 6 Change Requests in the Change Control Process. Verbiage updated for clarity and to best reflect actual coding of current reports Remove reference to specific URL to allow flexibility in the event of future platform changes.		
Calculation	**Percentage of Software Errors Corrected in "X" Business Days** = (a / b) X 100 a = Total number of software errors corrected in "X" business days, ~~as defined for each severity level (Severity 2, Severity 3, and Severity 4)~~ b = Total number ~~of Severity 2, Severity 3, and Severity 4~~ software errors corrected and software errors overdue past their standard interval Verbiage updated for clarity and to best reflect actual coding of current reports		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Report Structure	• ~~Severity 2 – 10 Business Days~~ • ~~Severity 3 – 30 Business Days~~ • ~~Severity 4 – 45 Business Days~~ • AT&T Aggregate • Geographic Scope -Region Verbiage updated for clarity and to best reflect actual coding of current reports		
SQM Disaggregation Analog/Benchmark	**SQM Level of Disaggregation** **SQM/~~SEEM~~ Analog/Benchmark** • ~~Errors~~Severity 2 Errors Corrected 95% within Interval • Severity 3 Errors Corrected...................................95% within Interval • Severity 4 Errors Corrected...................................95% within Interval Verbiage updated for clarity and to best reflect actual coding of current reports		
~~**SEEM Measure**~~	~~SEEM Tier I Tier II~~ ~~Yes X~~ Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan Eliminate Tier 2 remedies. Local markets irreversibly open. Thirteen years since passage of 96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed	sure SEEM Tier I Tier II Yes X...................X **Discuss the EDR report and AT&T's claim that they have 5 days to evaluate whether the patch placed in production is actually working.**	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Change Management		
CM-7	CRA	~~Change Requests Accepted or Rejected within 10 Business Days~~			
Definition		~~This report measures the percentage of change requests, other than Type 1 or Type 6 Change Requests, submitted by CLECs that are accepted or rejected by BellSouth in 10 business days within the report period.~~ Eliminate metric to simplify plan. AT&T consistently provides a high level of performance. Low volume – only 3 change requests submitted over past 12 months, June 2008 to May 2009 with performance at 100% for meeting the 95% benchmark. Measures a process that does not have any direct, significant impact on CLECs and end users.		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
Exclusions		~~Change requests canceled or withdrawn before a response from BellSouth is due~~			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~Business Rules~~	~~The acceptance/rejection interval begins when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found on the Interconnection website: (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html) The interval ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions that have been responded to within the reporting period.~~		
~~Calculation~~	~~**Percentage of Change Requests Accepted or Rejected within 10 Business Days = (a / b) X 100**~~ ~~a = Total number of change request responses due in the reporting period that were accepted or rejected within 10 business days~~ ~~b = Total number of change requests due in the reporting period~~		
~~Report Structure~~	~~BellSouth Aggregate~~ ~~Geographic Scope~~ ~~gion~~		
~~SQM Disaggregation Analog/Benchmark~~	~~**SQM Level of Disaggregation**~~ ~~**SQM/SEEM Analog/Benchmark**~~ ~~Requests Accepted/Rejected~~ ~~95% within Interval~~	SQM Level of Disaggregation SQM/SEEM Analog/Benchmark ~~95~~98% within Interval	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes .... X~~	sure SEEM Tier I Tier II Yes X....................X AT&T is not using full capacity.	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Change Management**		
CM-8	CRR	~~Percent Change Requests Rejected~~			
		~~This report measures the percentage of change requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected within the report period.~~ ~~Rationale:~~ ~~Eliminate metric to simplify plan.~~ ~~Total volume of change requests for all disaggregation in this diagnostic measure is low (10) for last 12 months, June 2008 to May 2009.~~ ~~Measures a process that does not have direct, significant impact on CLECs and end users.~~		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
		~~Change requests canceled or withdrawn before a response from BellSouth AT&T is due~~			
Business Rules		~~This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejection per the Change Control Process, a copy of which can be found on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html) (http://wholesale.att.com/reference_library/processes/ccp_live/ccp_doc_bccp.html). These reasons are: cost, technical feasibility, and industry direction. This metric includes all change requests not subject to the above exclusions that have been responded to within the reporting period.~~			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~Calculation~~	~~Percent Change Requests Rejected = (a / b) X 100~~ ~~a = Total number of change requests rejected in the reporting period~~ ~~b = Total number of change requests responded to within the reporting period~~		
~~Report Structure~~	~~BellSouth AT&T Aggregate~~ ~~Geographic Scope~~		
~~SQM Level of Disaggregation - Analog/Bench mark~~	~~SQM Level of Disaggregation~~ ~~SQM Analog/Benchmark~~ ~~Reason Cost~~ ~~Diagnostic~~ ~~Reason Technical Feasibility~~ ~~Diagnostic~~ ~~Reason Industry Direction~~ ~~Diagnostic~~ ~~Reason Out of Scope (OOS)~~ ~~Diagnostic~~		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~No~~	sure SEEM Tier I Tier II ~~No~~ YES X .... Suggest report include number of defects introduced by minor release as a separate disaggregation.	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Meas ure Categ ory Code	Title of the Measure	**Change Management**	
CM-9	NDP R	~~Number of Defects in Production Releases (Type 6 CR)~~		
		~~This report measures the number of defects in production releases. This measure will be presented as the number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, the number of Type 6 Severity 3 Defects, and the number of Type 6 Severity 4 Defects resulting within a three week period from a production release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, Severity 3, and Severity 4 Defects can be found in the Change Control Process document.~~ ~~Eliminate metric to simplify plan.~~ ~~AT&T recommends removal of this measure as it is no longer needed based on low volume, 0 in last 12-month report (June 2008 through May 2009), and level of performance.~~		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
		~~None~~		
Business Rules		~~This metric measures the number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, the number of Type 6 Severity 3 Defects, and the number of Type 6 Severity 4 Defects resulting within a three week period from a production release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, 3, and 4 Defects can be found in the Change Control Process, which can be found on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html)~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, the number of Type 6 Severity 3 Defects, and the number of Type 6 Severity 4 Defects.		
Report Structure	• Production Releases • Number of Type 6 Severity 1 Defects • Number of Type 6 Severity 2 Defects without a mechanized work around • Number of Type 6 Severity 3 Defects • Number of Type 6 Severity 4 Defects • Geographic Scope Region		
SQM Level of Disaggregation – Analog/Benchmark	SQM Level of Disaggregation SQM Analog/Benchmark • Number of Type 6 Severity 1 Defects 0 Defects • Number of Type 6 Severity 2 Defects 0 Defects without a mechanized work around • Number of Type 6 Severity 3 Defects 0 Defects • Number of Type 6 Severity 4 Defects................0 Defects		
SEEM Measure	SEEM Tier I Tier II No		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Change Management**		
~~CM-10~~	~~SV~~	~~Software Validation~~			
	~~This report measures software validation test results for production releases of BellSouth local interfaces.~~ ~~Rationale:~~ ~~Eliminate metric to simplify plan.~~ ~~AT&T consistently provides a high level of service performance.~~ ~~Performance for past 12 months (June 2008 through May 2009) exceeded software validation requirements benchmark of 95% for all production releases.~~			**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
	~~None~~				

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	BellSouth maintains a test deck of transactions that are used to validate that functionality in software production releases work as designed. Each transaction in the test deck is assigned a weight factor based on the weights assigned to the metrics. Within the software validation metric, weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE) and then equally distributed across transactions within the specific type.		
	BellSouth AT&T will begin to execute the software validation test deck within one (1) business day following a production release. Test deck transactions will be executed using production release software in the CAVE environment. Within seven (7) business days following completion of the production release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.		
	A transaction is considered failed if the request cannot be submitted or processed, or results in incorrect or improperly formatted data.		
	The test deck scenario weight table can be found in the Change Control Process, a copy of which can be found on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html) (http://wholesale.att.com/reference_library/processes/ccp_live/ccp_doc_beep.html).		
Calculation	This software validation metric is defined as the ratio of the sum of the weights of failed transactions using production release software in CAVE to the sum of the weights of all transactions in the test deck.		
	• Numerator = Sum of weights of failed transactions		
	• Denominator = Sum of weights of all transactions in the test deck		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~Report Structure~~	• ~~BellSouth Aggregate~~ • ~~Geographic Scope~~ ~~Region~~		
~~SQM Level of Disaggregation~~ ~~–~~ ~~Analog/Bench mark~~	**~~SQM Level of Disaggregation~~** **~~SQM Analog/Benchmark~~** • ~~Failed Transactions~~ ~~<= 5%~~		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~No ....~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Change Management**		
CM-11	SCRI	~~Percentage of Software Change Requests Implemented within 60 Weeks of Prioritization~~			
~~Definition~~	~~This report measures whether BellSouth provides CLECs timely implementation of prioritized software change requests.~~ Rationale: • ~~Eliminate metric to simplify plan.~~ • ~~AT&T consistently provides a high level of service performance.~~ • ~~Performance for past 12 months met the benchmark for all change requests.~~ • ~~Low volume (6) with no misses for Type 4 or 5 change requests submitted from June 2008 through May 2009~~ • ~~Measures a process that does not have direct, significant impact on CLECs and end users.~~		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
~~Exclusions~~	• ~~Software change requests implemented later than 60 weeks with the consent of the CLECs~~ • ~~Software change requests where BellSouth has regulatory authority to exceed the interval~~	Exclusions ~~Software change requests implemented later than 60 weeks with the consent of the CLECs~~ • Software change requests where BellSouth has regulatory authority to exceed the interval	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	The interval for each software change request begins when it has first been prioritized as described in the Change Control Process and ends when the software change request has been implemented by BellSouth and made available to the CLECs. However, the 60-week clock may be restarted if a reprioritization is requested solely at the discretion of the CLECs and a CR is moved to a later release.		
Calculation	**Percentage of Type 5 CLEC Initiated Software Change Requests Implemented on Time = (a / b) X 100** • a = Total number of prioritized Type 5 software change requests implemented each month that are less than or equal to 60 weeks of age from the date of their first prioritization plus all other prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization • b = All entries in "a" above plus all Type 5 software change requests prioritized more than 60 weeks before the end of the monthly reporting period **Percentage of Type 4 BellSouth Initiated Software Change Requests Implemented on Time = (c / d) X 100** • c = Total number of prioritized Type 4 software change requests implemented each month that are less than or equal to 60 weeks of age from the date of the release prioritization list plus all other Type 4 prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization • d = All entries in "c" above plus all Type 4 software change requests prioritized more than 60 weeks before the end of the monthly reporting period		
Report Structure	• BellSouth Aggregate • Type 4 Requests Implemented • Type 5 Requests Implemented • Percent implemented within 16, 32, 48 and 60 weeks • Geographic Scope Region		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
~~SQM Disaggregation Analog/Bench mark~~	~~SQM Level of Disaggregation~~ ~~SQM/SEEM Analog/Benchmark~~ • ~~Type 4 Requests Implemented~~ ~~95% within Interval~~ • ~~Type 5 Requests Implemented~~ ~~95% within Interval~~		
~~SEEM Measure~~	~~SEEM Tier I Tier II~~ ~~Yes ....X~~	SEEM Measure SEEM Tier I Tier II Yes X....................X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Change Management**	
~~CM-11A~~	~~PCRI~~	~~Average Time to Implement Process Change Requests~~		

SQM Section	AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale	
~~Definition~~	~~This report measures the average time BellSouth takes to implement prioritized Process Change Requests.~~ ~~Rationale:~~ ~~• Eliminate metric to simplify plan.~~ ~~• AT&T has not reported any activity data for this measure for the past 12 months. June 2008 to May 2009.~~	Definition This report measures the average time BellSouth takes to implement prioritized Process Change Requests. and the time Change Requests are in the Accepted Held status.	**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T accepted CLECs' proposal in their response to Action Item No 22 to eliminate Change Management metrics CM-7 and CM-11A and leave all other Change Management metrics as is currently structured.*
~~Exclusions~~	~~• Process Change Requests implemented later than 60 days with the consent of the CLECs~~ ~~• Process Change Requests where BellSouth has regulatory authority to exceed the interval~~	Exclusions ~~• Process Change Requests implemented later than 60 days with the consent of the CLECs~~ • Process Change Requests where BellSouth has regulatory authority to exceed the interval	
~~Business Rules~~	~~The interval for each Process Change Request begins when it has been prioritized as described in the Change Control Process and ends when the Process Change Request has been implemented by BellSouth and made available to the CLECs.~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	**Average Implementation Time for the Type 5 CLEC Initiated Process Change Requests = (a / b)** • a = Sum of implementation times for the prioritized Type 5 Process Change Requests implemented within the data month • b = Total number of prioritized Type 5 Process Change Requests implemented within the data month **Average Implementation Time for the Type 4 BellSouth Initiated Process Change Requests = (c / d)** • c = Sum of implementation times for the prioritized Type 4 Process Change Requests implemented within the data month • d = Total number of prioritized Type 4 Process Change Requests implemented within the data month		
Report Structure	• BellSouth Aggregate • Type 4 Process Change Requests implemented • Type 5 Process Change Requests implemented • Geographic Scope Region		
SEEM Measure	SEEM Tier I Tier II No		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix A			A	**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**
		x	ACD	
		A mathematical operator representing multiplication	Automatic Call Distributor - A service that provides status monitoring of agents in a call center and routes high volume incoming telephone calls to available agents while collecting management information on both callers and attendants.	
		~~LCSC~~LSC		
		Local ~~Carrier~~ Service Center - The ~~BellSouth~~AT&T center which is dedicated to handling CLEC LSRs and preordering transactions, along with associated expedite requests and escalations.	ACT Automated Completion Transmittal System	
		~~PMAP~~	B	
		~~Performance Measurement Analysis Platform – Provides delivery of performance reports via the web and facilitates analysis of the summary level data.~~	BOCRIS	
			Business Office Customer Record Information System (Front-end to the CRIS database) – System used to maintain customer account information which includes, but is not limited to bills, payment history, and memo notations made during customer contact.	
		~~SEEM~~	BOG Bulk Order Generator	
		~~Self Effectuating Enforcement Mechanism – A tiered remedy structure in which payments are made either to the CLEC and/or state regulatory agency, depending on the type and level of parity/benchmark miss that occurs~~		
		WebTAXI		
		Web-based application for viewing and tracking claims and for creating CABS billing adjustments		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: • To define mathematical operator representing multiplication • The duties and functions performed by the BellSouth Local Carrier Service Center (LCSC) are now performed by the AT&T Local Service Center (LSC). • Remove references where appropriate to specific systems throughout document to provide possible system flexibility • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan • Added definition of WebTAXI system to Appendix A: Glossary of Acronyms and Terms.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Appendix

Appendix B	~~BellSouth~~AT&T Audit and Dispute Resolution Policy **Audit** ~~BellSouth~~AT&T currently provides CLECs with certain audit rights as a part of their individual interconnection agreements. If ~~requested~~ ordered by ~~a~~ the Public Service Commission, ~~BellSouth~~AT&T will agree to undergo an SQM audit. Unless otherwise agreed between AT&T and the Public Service Commission, t Fhe audit should be conducted by an independent third party auditor. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. Audit will be conducted under the following specifications: 1. The cost of one audit per version of the SEEM plan shall be borne by ~~BellSouth~~AT&T. 2. Should an independent third party auditor be required, it shall be selected by ~~BellSouth~~AT&T and the PSC. 3. ~~BellSouth~~AT&T and the PSC shall jointly determine the scope of the audit. 4. The PSC may request input regarding selection of the auditor and audit scope from interested parties. These audits are intended to provide the basis for the PSCs and CLECs to determine that the SQM and ~~PMAP~~ the AT&T performance measurement data report process produce accurate data that reflects each State's Order for performance measurements. Rationale: Added verbiage to ensure cooperative decision. Added to limit AT&T exposure to additional expense for multiple audits		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Dispute Resolution Notwithstanding any other provision of the Interconnection Agreement between AT&T and each CLEC, if a dispute arises regarding AT&T's performance or obligations pursuant to this Plan, AT&T and the CLEC shall negotiate in good faith for a period of thirty (30) days to resolve the dispute. If at the conclusion of the 30 day period, AT&T and the CLEC are unable to reach a resolution, then the dispute shall be resolved by the Commission. Rationale: Inserted verbiage from SEEM Plan into SQM to provide for Dispute Resolution description .		*As the result of the workshop discussion regarding the Dispute Resolution in the SEEM Plan, AT&T agreed with CLECs to incorporate the same SEEM Plan Dispute Resolution verbiage in the SQM Plan, Appendix B.*

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix C			OSS-1 [ARI]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair) Table 1: Legacy System Access Times For RNS System ContractData Avg. Sec. # of Calls RSAG RSAG-TN Address ....x ....x RSAG RSAG-ADDR Address ....x ....x ATLAS ATLAS-TN TN ....x ....x DSAP DSAP-DDI Schedule.......x ....x CRIS CRSACCTS CSR ....x ....x OASIS OASISBIG Feature/Service........................x x Table 2: Legacy System Access Times For R0S System ContractData Avg. sec. # of Calls RSAG RSAG-TN Address ....x ....x RSAG RSAG-ADDR Address ....x ....x ATLAS ATLAS-TN TN ....x ....x DSAP DSAP-DDI Schedule.......x ....x CRIS CRSOCSR CSR ....x ....x OASIS OASISBIG Feature/Service........................x x	**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		Table 3: Legacy System Access Times For LENS/Enhanced Verigate (Pre-Order only) System ContractData Avg. sec. # of Calls RSAG RSAG-TN Address ....x .... x RSAG RSAG-ADDR Address ....x .... x ATLAS ATLAS-TN TN ....x .... x DSAP DSAP-DDI Schedule.......x .... x CRIS CRSECSRL CSR..............x .... x COFFI COFFI/USOC Feature/Service........................ x x P/SIMS PSIMS/ORB Feature/Service........................ x x Table 4: Legacy System Access Times For TAG/XML System ContractData Avg. sec. # of Calls RSAG RSAG-TN Address ....x .... x RSAG RSAG-ADDR Address ....x .... x ATLAS ATLAS-TN TN ....x .... x ATLAS ATLAS-MLH TN ....x .... x ATLAS ATLAS-DID TN ....x .... x DSAP DSAP-DDI Schedule.......x .... x CRIS CRSECSRL CSR..............x .... x P/SIMS PSIM/ORB Feature/Service........................ x x If LENS works on the TAG/XML code why are the table 3 and 4 different? AT&T's post July release needs to be described for Table 4.	
	OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair) **OSS Table 2: SQM Interface Availability for Maintenance &**	OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair) OSS Table 1: SQM Interface Availability for Pre-	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Repair	Ordering/Ordering	

	OSS Interface Availability	%	OSS Interface Availability		
	~~BellSouth~~ AT&T TAFI	x	Application	Applicable to	% Availability
	CLEC TAFI	x	EDI	CLEC	x
	CLEC ECTA*	x	LENS	CLEC	x
	WHLS		LASR	CLEC	x
	eRepair*	x	WFM	CLEC	x
	~~BellSouth~~ AT&T & CLEC		OBF	CLEC	x
	CRIS	x	Enhanced Verigate	CLEC	x
	LMOS HOST	x	LESOG	CLEC	x
	LNP Gateway	x	TAG/XML	CLEC	x
	MARCH	x	LNP Gateway	CLEC	x
	OSPCM	x	COG	CLEC	x
	PREDICTOR	x	SGG	CLEC	x
	SOCS	x	ACTS	CLEC.	X
			NVAT	CLEC	X
			BOG	CLEC	X
	*Note: eRepair will be repalcing ECTA. CLECs have until June 1, 2008 to transition to eRepair. From November of 2007 until May of 2008, at&t will report both interfaces. Beginning June 1, 2008, only eRepair will be reported.		DOE	CLEC/BellSouth	x
			SONGS	CLEC/BellSouth	x
			ATLAS/COFFI	CLEC/BellSouth	x
			BOCRIS/CRIS	CLEC/BellSouth	x
	Rationale:		DSAP	CLEC/BellSouth	x
	• Update of expired note to reflect change of application to replace ECTA.		RSAG	CLEC/BellSouth	x
			SOCS	CLEC/BellSouth	x
	AT&T is in the process of implementing a 22 state ELECTRONIC BONDING TROUBLE ADMINISTRATION (EBTA) OSS that will take over the functionality of ECTA. Accessible Letters provided during this process will advise on current status. ECTA is expected to remain available until 1st Qtr. 2010. Future application of eRepair has not been determined.		LFACS	CLEC/BellSouth	x
			RNS	BellSouth	x
			ROS	BellSouth	x

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		OSS Table 2: SQM Interface Availability for Maintenance & Repair	
		OSS Interface % Availability	
		BellSouth TAFI x	
		CLEC TAFI x	
		CLEC ECTA* x	
		WHLS eRepair................x	
		BellSouth & CLEC	
		CRIS x	
		LMOS HOST x	
		LNP Gateway x	
		MARCH x	
		OSPCM x	
		PREDICTOR x	
		SOCS x	
		*Note: eRepair will be repalcing ECTA. CLECs have until June 1, 2008 to transition to eRepair. From November of 2007 until May of 2008, at&t will report both interfaces.Beginning June 1, 2008, only eRepair will be reported. I believe eRepair was withdrawn, how does EBTA, CPSS, fit into this chart?	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**		

| Appendix D | ~~BellSouth's~~AT&T's Policy on Reposting of Performance Data ~~and Recalculation of SEEM Payments Raw (Supporting) Data Files (SDF)~~

~~BellSouth~~AT&T will be required to ~~repost~~make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports ~~and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS),~~ to the extent technically feasible, under the following circumstances:

...

• 4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of >~~<~~= .5 in the ~~z~~Z-~~S~~score at the sub-metric level.

• ~~7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of May, BellSouth will correct data for May and the three preceding months - April, March and February.~~

• ~~8. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies resulting from the application of this policy~~ | BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments

6. SQM Performance data will be reposted for a maximum of three months in arrears.

~~from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, BellSouth will correct the data beginning with the month of detection (May) and the three months preceding—April, March and February.~~

7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears ~~from date of detection.~~ Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be | **Parties Agree. Noted below is the Plan language to which the parties agree.**

Appendix D: ~~BellSouth's~~AT&T's Policy on Reposting of Performance Data ~~and Recalculation of SEEM Payments Raw (Supporting) Data Files (SDF)~~

~~BellSouth~~AT&T will be required to ~~repost~~make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports ~~and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS),~~ to the extent technically feasible, under the following circumstances:

1. Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics to reposting. A notice will be placed on the ~~PMAP~~ AT&T performance measurement website advising CLECs when reposted data is available.

2. SQM Peformance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting.

3. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an "out of parity" condition will be available for reposting |

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 and Tier 2 remedies will be made at BellSouth's discretion. • 9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments. ... Rationale: • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan • Corrected spelling of Z-Score and corrected typing error for > symbol • Remove reference to PMAP to allow flexibility in the event of platform changes in the future **Determination of when Reposting Policy Applies** As part of the Change Notification Process, BellSouthAT&T performs an analysis of impacts that are proposed to be made to Performance Measurement Application Platform (PMAP)the AT&T performance measurement reporting process code. These impacts are used to identify changes to its reported SQM results. To determine this impact, BellSouthAT&T performs a query of the data warehouse to identify those records that would be impacted by the proposed change. Once the number of records are identified, the measurement is recalculated to determine the impact. This is the general framework for analysis - the specific steps used to evaluate the impact will vary with the issue being analyzed. However, the following example may assist in understanding. Assume that service orders were erroneously being included in a particular product disaggregation for Percent Missed Installation Appointments. They should have been in another product	discovered for the data month of May, BellSouth will correct data for May and the three preceding months – April, March and February.	whenever there is a >=2% decline in BellSouth'sAT&T's performance at the sub-metric level. 4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of >=< .5 in the zZ-Sscore at the sub-metric level. 5. Any data recalcualtions that reflect an improvement in BellSouth'sAT&T's performance will be reposted at BellSouth'sAT&T's discretion. However, statewide performance must improve by at least 2% for benchmark measures and the z-score must imporve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting. 6. SQM Performance data will be reposted for a maximum of three months in arrears from implementation of the change of programming request requirement (RQ) which corrects a detected error.date of detection. RQs shall not be unreasonably delayed after the date the error is detected. As an example, should an error isbe discovered during the analysis of the May data month peformance that triggers a reposting, and this error triggers a repostingbut the RQ correcting the error is implemented in the calendar month of July with the June data month performance reports, BellSouthAT&T will correct the data beginning with the month of the RQ implementation (July)detection (May), which would be for the June data month performance reports, and will repost the data month performance reports for the three months preceding data month performance reports – May, April, and March and February. • 7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	disaggregation. Further, assume that the number of records erroneously included is 110 records out of a total of 86,000. In this example, the numerator and denominator would both be reduced by 110 records and the ~~zscore~~ Z-Score would be recalculated. If the amount of the change was sufficient to meet criteria 2, 4 or 5 above, the Reposting policy will be invoked. Rationale: Administrative change to correct spelling of Z-Score.		~~for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of May,~~ **BellSouth** ~~will correct data for May and the three preceding months — April, March and February.~~ ~~• 8. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 and Tier 2 remedies will be made at~~ **BellSouth's** ~~discretion.~~ ~~• 9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.~~ When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting ~~BellSouth~~ AT&T to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items 3, 4, or 5 have been met at the CLEC-specific level. **Determination of when Reposting Policy Applies** As part of the Change Notification Process, ~~BellSouth~~ AT&T performs an analysis of impacts that are proposed to be made to ~~Performance Measurement Application Platform (PMAP)~~ the AT&T performance measurement reporting process code. These impacts are used to identify changes to its reported SQM results. To determine this impact, ~~BellSouth~~ AT&T performs a

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
			query of the data warehouse to identify those records that would be impacted by the proposed change. Once the number of records are identified, the measurement is recalculated to determine the impact. This is the general framework for analysis - the specific steps used to evaluate the impact will vary with the issue being analyzed. However, the following example may assist in understanding. Assume that service orders were erroneously being included in a particular product disaggregation for Percent Missed Installation Appointments. They should have been in another product disaggregation. Further, assume that the number of records erroneously included is 110 records out of a total of 86,000. In this example, the numerator and denominator would both be reduced by 110 records and the ~~zscore~~ Z-Score would be recalculated. If the amount of the change was sufficient to meet criteria 2, 4 or 5 above, the Reposting policy will be invoked.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Meas ure Categ ory Code	Title of the Measure	**Appendix**

SQM Section	AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale	
Appendix E	**II. Raw (Supporting) Data – General** **Raw (Supporting) Data Files (SDF)** Raw (Supporting) Data Files for CLEC data will be published on the ~~PMAP~~ AT&T performance measurement website each month. For the measures calculated in ~~PMAP~~the AT&T performance measurement report process, these files will contain the CLEC initiated records required to replicate the report or reports as applicable. These files will be present for those reports generated from data processed by ~~PMAP.~~ the AT&T performance measurement report process. Some reports are calculated outside of ~~PMAP~~the AT&T performance measurement report process and the results are simply uploaded for posting. These reports will have less detailed Supporting Data Files. **B. Raw Data (SDF) Records - Ordering** **For Ordering Metrics:** Supporting data is provided for the following metrics: • ~~O-2 [AKC]: Acknowledgement Message Completeness~~ • O-8 [RI]: Reject Interval • O-9 [FOCT]: Firm Order Confirmation Timeliness • ~~O-11 [FOCC]: Firm Order Confirmation and Reject Response~~		**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~Completeness~~		
	As a general rule, all versions of transactions are provided in the Supporting Data Files. Records for Service Requests that are related to a project, cancelled prior to being FOC'd or Clarified/Rejected, and versions of records not used in the reports will be placed into the Other Supporting Data File – Ordering. **C. Raw Data (SDF) Records – Provisioning** **For Provisioning Metrics:** Supporting data is provided for the following metrics: • P-1 [HOI]: Held Order Interval • P-2A [PJ48]: Percentage of Orders Given Jeopardy Notices >= 48 Hours • P-2B [PJ]: Percentage of Orders Given Jeopardy Notices • P-3 [MIA]: Percent Missed Installation Appointments • P-4 [OCI]: Order Completion Interval • P-5 [CNI]: Average Completion Notice Interval • P-7 [CCI]: Coordinated Customer Conversions Interval – Hot Cut Duration • P-7A [CCT]: Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval ~~• P-7B [CCRT]: Coordinated Customer Conversions – Average Recovery Time~~ ~~• P-7C [CPT]: Hot Cut Conversions – Percent Provisioning Troubles Received within 5 Days of a Completed Service Order~~ • P-7D [NCDD]: Non-Coordinated Customer Conversions – Percent Completed and Notified on Due Date • P-9 [PPT]: Percent Provisioning Troubles within "X" Days of Service Order Completion • P-11 [SOA]: Service Order Accuracy • P-13B [LOOS]: LNP-Percent Out of Service < 60 Minutes ~~• P-13C [LAT]: LNP-Percentage of Time ~~BellSouth~~AT&T~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Applies the 10-Digit Trigger Prior to the LNP Order Due Date • P-13D [LDT]: LNP-Disconnect Timeliness (Non-Trigger) All service order activity that results from Service Requests generated by the CLEC and used in the calculation of a report will be furnished as a part of the Supporting Data Files. Records for D, R, F, and M order types, as well as cancelled orders will be placed in the Other Supporting Data File – Provisioning. Rationale: • Remove reference to PMAP to allow flexibility in the event of platform changes in the future • Rationale for removal of metrics O-2, O-11, P-7B, P-7C, and P-13C is provided on individual metric entry.		
	D. Raw Data (SDF) Records – M&R **For Maintenance and Repair (M&R) Metrics:** Supporting data is provided for the following metrics: ....M&R-1 [MRA]: Percent Missed Repair Appointments ....M&R-2 [CTRR]: Customer Trouble Report Rate Net of Provisioning Trouble and Repeat Reports ....M&R-3 [MAD]: Maintenance Average Duration ....M&R-4 [PRT]: Percent Repeat Customer Troubles within 30 Days ....M&R-5 [OOS]: Out of Service (OOS) > 24 Hours All customer submitted reports used in the calculation of a metric will be furnished as a part of the Supporting Data Files. Reports that are excluded, canceled, or in error, will be placed in the Other Supporting Data File - M&R. Specifically not included are BellSouthAT&T generated tickets such as employee, auto-detect, and tickets associated with service order activity dispatches. Rationale:		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Refer to M&R-2 [CTRR] metric for rationale.		
	E. Raw Data (SDF) Records – Other **For Other Metrics:** Supporting data is provided for the following metrics: ....B-1 [BIA]: Invoice Accuracy -2 [BIT]: Mean Time to Deliver Invoices ....B-5 [BUDT]: Usage Data Delivery Timeliness ....B-10 [BEC]: Percent Billing Adjustment Requests (BAR) Responded to within 40 Business Days The Billing Supporting Data File used to create performance measurements for billing is provided for CLECs on the PMAP website. This SDF along with the reports resulting from billing supporting data can be used for replicating the measures. Any billing data used or not used in creating the billing measures is part of the CLEC's invoices sent to them on a monthly basis. Any charges or adjustments are part of their individual invoices, which identify the nature of the charges or adjustments, whether credits or debits. **Database Update Information - None** **Trunk Group Performance – None** **Collocation – None:** Supporting data is provided for the following metrics: -1 [ART]: Collocation Average Response Time -2 [AT]: Collocation Average Arrangement Time ....C-3 [MDD]: Collocation Percent of Due Dates Missed **Change Management - None**		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: Rationale for removed Billing metrics-, C-1, and C-2 is provided on the individual metric entry Remove reference to PMAP to allow flexibility in the event of platform changes in the future		
	III. Supporting Data User Manual (SDUM) and Schema for Other Supporting Data Files (OSDF) The SDUM and Schema can be found at the AT&T performance measurement websiteURL (http://pmap.bellsouth.com) in the Documentation/Exhibits folder. Rationale: Remove reference to PMAP to allow flexibility in the event of platform		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**		
SQM Section		AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale		
Appendix F		BellSouthPMAP Data Notification Process 1. On the first business day of the month preceding the data month for which BellSouth proposes to make any change to the method by which its performance data is calculated, BellSouthwill provide written notice of any such AT&T's Proposed Changes/Rationale (hereinafter referred to as "Proposed Data Changes"). This notice will identify the affected measure(s), describe the proposed change, provide a reason for the proposed change, and outline its impact. At the same time BellSouthwill provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following data month (hereinafter referred to as "Preliminary Data Changes"). 2. No later than four business days after the written notice referenced above has been provided, BellSouth will conduct an industry conference call at which time the affected parties as well as the Commission can ask questions about either the Proposed Data Changes or the Preliminary Data Changes. The call will be conducted from 2:00 to 5:00 p.m. (Eastern Time). 3. No later than ten (10) business days after the industry conference call, affected parties must file written comments with the Commission to the extent they have objections or concerns about the Proposed Data Changes.		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *Parties reached agreement for revised Data Notification Process as described in response to Action Item No. 32.*	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	4. ~~The Proposed Data Changes set forth in the written notice referenced above would be presumptively valid and deemed approved by the Commission effective thirty (30) calendar days after that notice unless the Commission Staff directs BellSouth not to go forward with the changes.~~ Rationale: • Eliminate administrative requirement to simplify plan. • No objections or concerns have been filed by any party with the Commission for any changes notified by AT&T. • AT&T is held accountable for maintaining code that is complaint with the Exclusions, Business Rules, Calculation, Report Structure and SQM Disaggregation as noted in the SQM plan for each metric. • All changes to the code that supports the SQM plan is subject to audit.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measu re Categ ory Code	Title of the Measure	Appendix

Appendix GF	**SQM Equity Determination** **C. Equity Determination** Exception 2: Measures OSS-1 (ARI), O-12 [OAAT], B-1 [BIA], B-2 [BIT], and M & R-6 [MAAT] also use the "Direct Comparison" criteria. Rationale: Refer to Billing and Average Answer Time measures for removal rationale for these verbiage changes		**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure

Appendix

Appendix	H	Special Access Measurements

Area to be subject of PSC Workshop and ultimately staff recommendation.

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	MAINTENANCE AND REPAIR		
	Rationale:		
	• Eliminate Appendix H (Special Access Measurements) to simplify plan.		
	• Special Access metrics covered by FCC requirement.		
	• AT&T's voluntary commitments set forth in Appendix F of the FCC's Memorandum Opinion and Order in the AT&T BellSouth Merger (WC Docket No. 06-74).		
	• FCC "BOC Nondominance Order" established obligation to track and report to the FCC compliance with special access metrics on a quarterly basis (WC Docket 06-120 Section 272 (f)1 Sunset of the BOC Separate Affiliation and Related Requirements).		
	• AT&T FCC report provides monthly and Year-to-date performance by state by DSO, DS1 and DS3 services for the following measures:		
	○ FOCT: Firm Order Confirmation (FOC) Timeliness		
	○ PIAM: Percent Installation Appointments Met		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	o NITR: New Installation Trouble Report Rate o CTRR: Failure Rate - Trouble Report Rate o MAD: Average Repair Interval / Mean Time to Restore		
Reporting Dimensions	CLEC or IXC Carrier specific total, with the following reporting dimensions for all measurements. —Special Access disaggregated by bandwidth ——Sub Totaled by State ——Totaled by BellSouth Comparison reports are required for: —CLEC/ IXC Carrier Aggregate —BellSouth Long Distance (BSLD) Aggregate Special Access is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing BellSouth end office switches. Special Access Services include dedicated and shared facilities configured to support analog/voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services. Exclusions: Transmission path requests pursuant to an Interconnection Agreement for Unbundled Network Elements (UNE) are excluded from these Performance Measures. Reporting Period: The reporting period is the calendar month, unless otherwise noted, with all averages or percentages displayed to one decimal point.	.	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**	
~~Appendix~~	~~H~~	~~ORDERING~~ ~~Measurement: SA-1 FOC Receipt~~		
~~Description~~		~~The Firm Order Confirmation (FOC) is the BellSouth response to an Access Service Request (ASR), whether an initial or supplement ASR, that provides the CLEC or IXC Carrier with the specific Due Date on which the requested circuit or circuits will be installed. BellSouth will conduct a minimum of an electronic facilities check to ensure due dates delivered in FOCs can be relied upon. The performance standard for FOCs received within the standard interval is expressed as a percentage of the total FOCs received during the reporting period. A diagnostic distribution is required along with a count of ASRs withdrawn at BellSouth's request due to a lack of BellSouth facilities or otherwise.~~		
~~Calculation Methodology~~		~~**Percent Meeting Performance Standard:**~~ ~~[Count FOCs received where (FOC Receipt Date – ASR Received Date) <= Performance Standard] / Total FOCs received during reporting period x 100~~ ~~**FOC Receipt - Distribution:**~~ ~~(FOC Receipt Date – ASR Received Date), for each FOC received during reporting period, distributed by:~~ ~~0 days, >0 <=1day, >0 day <=2 days, >0 day <= 5 days, >2 days <= 10 days, > 10 days~~ ~~**ASRs Withdrawn at BellSouth Request due to a lack of BellSouth Facilities or Otherwise:**~~ ~~Count of ASRs, which have not yet received a FOC, Withdrawn at BellSouth's Request, during the current reporting period, due to a~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~lack of BellSouth facilities or otherwise~~		
Business Rules	~~1. Counts are based on each instance of a FOC received from BellSouth. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.~~ ~~2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.~~ ~~3. Projects are included.~~		
Exclusions	~~Unsolicited FOCs~~ ~~Disconnect ASRs~~ ~~Cancelled ASRs~~ ~~Record ASRs~~	Exclusions ~~Unsolicited FOCs~~ Disconnect ASRs Cancelled ASRs Record ASRs	
Levels of Disaggregation	~~DS0~~ ~~DS1~~ ~~DS3 (Non Optical)~~ ~~DS3 (Optical OCn)~~		
Performance Standard	~~Percent FOCs Received within Standard~~ ~~DS0 >= 98.0% within 2 business days~~ ~~DS1 >= 98.0% within 2 business days~~ ~~DS3 >= 98.0% within 5 business days~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~OCn — ICB (Individual Case Basis)~~ ~~FOC Receipt Distribution~~ ~~Diagnostic~~ ~~ASRs Withdrawn at BellSouth's Request Due to a Lack of~~ ~~BellSouth Facilities or Otherwise~~ ~~Diagnostic~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**	
Appendix	H	~~ORDERING~~ ~~Measurement: SA-2 FOC Receipt Past Due~~		
~~Description~~		~~The FOC Receipt Past Due measure tracks all ASR requests that have not received an FOC from BellSouth within the expected FOC receipt interval, as of the last day of the reporting period and do not have an open, or outstanding, Query/Reject. This measure gauges the magnitude of late FOCs. A distribution of these late FOCs, along with a report of those late FOCs that do have an open Query/Reject, is required for diagnostic purposes.~~		
~~Calculation Methodology~~		~~**Percent FOC Receipt Past Due - Without Open Query/Reject**:~~ ~~Sum of ASRs without a FOC Received, and a Query/Reject is not open, where (End of Reporting Period - ASR Received Date >Expected FOC Receipt Interval) / Total number of ASRs received during reporting period x 100~~ ~~**FOC Receipt Past Due - Without Open Query/Reject - Distribution**:~~ ~~[(End of Reporting Period - ASR Received date) - (Expected FOC Receipt Interval)] for ASRs without a FOC received and a Query/Reject is not open with the CLEC or IXC Carrier, distributed by:~~ ~~0 days, >0 <= 5 days, >5 days <= 10 days, > 10 days <= 20 days, > 20 days <= 30 days, > 30 days <= 40 days, > 40 days~~ ~~**Percent FOC Receipt Past Due - With Open Query/Reject**:~~ ~~Sum of ASRs without a FOC Received, and a Query/Reject is open, where (End of Reporting Period - ASR Sent Date > Expected FOC~~		Formatted: Bullets and Numbering Formatted: Bullets and Numbering

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~Receipt Interval) / Total number of ASRs received during reporting period x 100~~		
~~Business Rules~~	~~1. All counts are based on the latest ASR request sent to BellSouth. Where one or more subsequent ASRs have been sent, only the latest ASR would be recorded as Past Due if no FOC had yet been returned.~~ ~~2. The Expected FOC Receipt Interval, used in the calculations, will be the interval identified in the Performance Standards for the FOC Receipt measure.~~ ~~3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.~~ ~~4. Projects are included.~~		
~~Exclusions~~	~~Unsolicited FOCs~~ ~~Disconnect ASRs~~ ~~Cancelled ASRs~~ ~~Record ASRs~~	Exclusions ~~Unsolicited FOCs~~ Disconnect ASRs Cancelled ASRs Record ASRs	
~~Levels of Disaggregatio n~~	~~DS0~~ ~~DS1~~ ~~DS3 (Non Optical)~~ ~~DS3 (Optical OCn)~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Performance Standard	Percent FOC Receipt Past Due – Without Open Query/Reject ...... < 2.0 % FOC Receipt Past Due FOC Receipt Past Due – Without Open Query/Reject – Distribution .... Diagnostic Percent FOC Receipt Past Due – With Open Query/Reject .... Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix	H	~~ORDERING~~ ~~Measurement: SA-3 Offered Versus Requested Due Date~~		
~~Description~~		~~The Offered Versus Desired Due Date measure reflects the degree to which BellSouth is committing to install service on the CLEC or IXC Carrier Desired Due Date (CDDD), when a Due Date desired is equal to or greater than the BellSouth stated interval. A distribution of the delta, the difference between the CDDD and the Offered Date, for these FOCs is required for diagnostic purposes.~~		
~~Calculation Methodology~~		~~**Percent Offered with CLEC or IXC Carrier Requested Due Date:**~~ ~~[Count of ASRs where (FOC Due Date = CDDD] / [Total number of ASRs where (CDDD – ASR Received Date) = >BellSouth Stated Interval] x 100~~ ~~**Offered versus Requested Interval Delta - Distribution:**~~ ~~[(Offered Due Date – CDDD) where (CDDD – ASR Received Date) = > BellSouth Stated Interval] for each FOC received during the reporting period, distributed by:~~ ~~0 days, >0 - <= 5 days, >5 days - <= 10 days, > 10 days - <= 20 days, > 20 days - <= 30 days, > 30 days - <= 40 days, > 40 days~~		
~~Business Rules~~		~~1. Counts are based on each instance of a FOC received from BellSouth. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.~~ ~~2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	weekend, or holiday, will be calculated with an end date of the last previous business day. 3. Projects are included		
Exclusions	—Unsolicited FOCs —Disconnect ASRs —Cancelled ASRs —Record ASRs	Exclusions —Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs	
Levels of Disaggregation	—DS0 —DS1 —DS3 (Non Optical) —DS3 (Optical OCn)		
Performance Standard	—Percent Offered with CDDD (where CDDD => BellSouth Stated Interval) = 100% —Offered versus Requested Interval Delta—Distribution...................................Diagnostic —BellSouth Stated Intervals: To be determined by BellSouth		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	
Appendix	H	**PROVISIONING**	**Appendix**
		Measurement: SA-4 On Time Performance To FOC Due Date	
Description		On Time Performance To FOC Due Date measures the percentage of circuits that are completed on the FOC Due Date, as recorded from the FOC received in response to the last ASR received. Customer Not Ready (CNR) situations are defined as Customer Not Ready (SR), No Access (SA), Customer Requests a Later Date (SL), and Customer Other (SO) which may result in an installation delay. The On Time Performance To FOC Due Date is calculated both with CNR consideration, i.e. measuring the percentage of time the service is installed on the FOC due date while counting CNR coded orders as an appointment met, and without CNR consideration.	
Calculation Methodology		Percent on Time Performance to FOC Due Date – With CNR Consideration.	
		[(Count of Circuits Completed on or before BellSouth Committed Due Date + Count of Circuits Completed after FOC Due Date with a verifiable CNR code) / (Count of Circuits Completed in Reporting Period)] x 100.	
		Percent on Time Performance to FOC Due Date – Without CNR Consideration.	
		[(Count of Circuits Completed on or before BellSouth Committed Due Date) / (Count of Circuits Completed in Reporting Period)] x 100.	
		Note: The denominator for both calculations is the total count of circuits completed during the reporting period, including all circuits, with and without a CNR code.	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

| Business Rules | 1. Measures are based on the last ASR received and the associated FOC Due Date received from BellSouth.

2. Selection is based on circuits completed by BellSouth during the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the service order is not considered completed for measurement purposes until all circuits are completed.

3. BellSouth Completion Date is the date upon which BellSouth completes installation of the circuit, as noted on a completion notice to the CLEC or IXC Carrier.

4. Projects are included.

5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation. | | |

| Exclusions | Unsolicited FOCs

Disconnect ASRs

Cancelled ASRs

Record ASRs | Exclusions

Unsolicited FOCs

Disconnect ASRs

Cancelled ASRs

Record ASRs | |

| Levels of Disaggregation | DS0

DS1

DS3 (Non Optical)

DS3 (Optical OCn) | | |

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Performance Standard	Percent On Time to FOC Due Date – With CNR Consideration => 98.0 % On Time Percent On Time to FOC Due Date – Without CNR Consideration –Diagnostic		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**	
~~Appendix~~	~~H~~	~~PROVISIONING~~ ~~Measurement: SA-5 Days Late~~		
~~Description~~		~~Days Late captures the magnitude of the delay, both in average and distribution, for those circuits not completed on the FOC Due Date, and the delay was not a result of a verifiable CNR situation. A breakdown of delay days caused by a lack of BellSouth facilities is required for diagnostic purposes.~~		
~~Calculation Methodology~~		~~**Average Days Late**:~~ ~~Σ [Circuit Completion Date BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code)] / (Count of Circuits Completed Beyond BellSouth Committed Due Date without a CNR code)~~ ~~**Days Late Distribution**:~~ ~~Circuit Completion Date BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code) distributed by:~~ ~~<= 1 day, 0 < 3 days, >1 <=5 days, >5 <=10 days, >10 <=20 days, >20 <=30 days, >30 <=40 days, >40 days~~ ~~**Average Days Late Due to a Lack of BellSouth Facilities**:~~ ~~Σ [Circuit Completion Date BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code and due to a Lack of BellSouth Facilities] / (Count of Circuits Completed Beyond BellSouthommitted Due Date without a CNR code and due to a Lack of BellSouth Facilities)~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	1. Measures are based on the latest valid ASR received and the associated FOC Due Date received from the BellSouth.		
	2. Selection is based on circuits completed by BellSouth during the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the service order is not considered completed for measurement purposes until all circuits are completed.		
	3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.		
	4. Projects are included		
	5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation		
Exclusions	Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs	Exclusions Unsolicited FOC's Disconnect ASRs Cancelled ASRs Record ASRs	
Levels of Disaggregation	DS0 DS1 DS3 (Non Optical) DS3 (Optical OCn)		

Initial Filing 10-30-2009 / Updated 04-02-2010

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Performance Standard	Average Days Late < 3.0 Days Days Late Distribution Diagnostic Average Days Late Due to a Lack of BellSouth Facilities......... Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**	
~~Appe ndix~~	~~H~~	~~PROVISIONING~~ ~~Measurement: SA-6 – Average Intervals – Requested/Offered/Installation~~		
~~Description~~		~~This measure captures three important aspects of the provisioning process and displays them in relation to each other. The Average CLEC or IXC Carrier Requested Interval, the Average BellSouth Offered Interval, and the Average Installation Interval, provide a comprehensive view of provisioning, with the ultimate goal of having these three intervals equivalent.~~		
~~Calculation Methodology~~		~~**Average CLEC or IXC Carrier Requested Interval:**~~ ~~Sum (CDDD – ASR Received Date) / Total Circuits Completed during reporting period~~ ~~**Average BellSouth Offered Interval:**~~ ~~Sum (FOC Due Date – ASR Received Date) / Total Circuits Completed during reporting period~~ ~~**Average Installation Interval:**~~ ~~Sum (BellSouth Completion Date – ASR Received Date) / Total Circuits Completed during reporting period~~		
~~**Business Rules**~~		~~1. Measures are based on the last ASR received and the associated FOC Due Date received from BellSouth.~~ ~~2. Selection is based on circuits completed by BellSouthhe reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the ASR is not considered completed for measurement purposes until all circuits are completed.~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day. 4. Projects are included 5. The Average Installation Interval includes all completions.		
Exclusions	—Unsolicited FOCs —Disconnect ASRs —Cancelled ASRs —Record ASRs	Exclusions —Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs	
Levels of Disaggregation	—DS0 —DS1 —DS3 (Non Optical) —DS3 (Optical OCn)		
Performance Standard	—Average Requested Interval............................... —Diagnostic —Average Offered Interval............................... —Diagnostic Average Installation Interval............................... —Diagnostic		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Appendix

SQM #	Measure Category Code	Title of the Measure		
Appendix	H	PROVISIONING Measurement: SA-7 Past Due Circuits		
Description		The Past Due Circuits measure provides a snapshot view of circuits not completed as of the end of the reporting period. The count is taken from those circuits that have received a FOC Due Date but the date has passed. Results are separated into those held for BellSouth reasons and those held for CLEC or IXC Carrier reasons (CNRs), with a breakdown, for diagnostic purposes, of Past Due Circuits due to a lack of BellSouth facilities. A diagnostic measure, Percent Cancellations After FOC Due Date, is included to show a percent of all cancellations processed during the reporting period where the cancellation took place after the FOC Due Date had passed.		
Calculation Methodology		Percent Past Due Circuits: – [(Count of all circuits not completed at the end of the reporting period > 5 days beyond the FOC Due Date, grouped separately for Total BellSouth Reasons, Lack of BellSouth Facility Reasons, and Total CLEC/Carrier Reasons) / (Total uncompleted circuits past FOC Due Date, for all missed reasons, at the end of the reporting period)] x 100. Past Due Circuits Distribution: – Count of all circuits past the FOC Due Date that have not been reported as completed (Calculated as last day of reporting period – FOC Due Date) Distributed by: <= 1 day, >1 <=5 days, 0 days <= 5 days, >5 <=10 days, >10 <=20 days, >20 <=30 days, >30 <=40 days, >40 days. Percent Cancellations after FOC Due Date:		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	[Count (All circuits cancelled during reporting period, that were Past Due at the end of the previous reporting period, where (Date Cancelled > FOC Due Date) / (Total circuits Past Due at the end of the previous reporting period)] x 100		
Business Rules	1. Calculation of Past Due Circuits is based on the most recent ASR and associated FOC Due Date. 2. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders, however, the service order is not considered completed for measurement purposes until all segments are completed. 3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day. 4. Projects are included. 5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation.		
Exclusions	Unsolicited FOCs Disconnect ASRs Record ASRs	Exclusions Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs	

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Levels of Disaggregation	DSO / DS1 / DS3 (Non Optical) / DS3 (Optical OCn)		
Performance Standard	Percent Past Due Circuits—Total BellSouth Reasons < 3.0 % > 5 days beyond FOC Due Date		
	Percent Past Due Circuits—Due to Lack of BellSouth Facilities Diagnostic		
	Percent Past Due Circuits—Total CLEC Reasons Diagnostic		
	Past Due Circuits Distribution Diagnostic		
	Percent Cancellation After FOC Due Date Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Appendix

SQ M#	Measure Category Code	Title of the Measure
Appendix	H	PROVISIONING

Measurement: SA-8 New Installation Trouble Report Rate |
| Description | | New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation. |
| Calculation Methodology | | **Trouble Report Rate within 30 Calendar Days of Installation:**

[Count (trouble reports within 30 Calendar Days of Installation) / (Total Number of Circuits Installed in the Report Period)] x 100 |
| Business Rules | | 1. BellSouth Completion Date is the date upon which BellSouth completes installation of the circuit, as noted on a completion advice to the CLEC or IXC Carrier.

2. The calculation for the following 30 calendar days is based on the creation date of the trouble ticket. |
| Exclusions | | Trouble tickets that are canceled at the CLEC's or IXC Carrier's request

CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles

BellSouth trouble reports associated with administrative service

Tickets used to track referrals of misdirected calls

CLEC or IXC Carrier requests for informational tickets |

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Levels of Disaggregati on	─DS0 ─DS1 ─DS3 (Non Optical) ─DS3 (Optical OCn) ─Below DS3 (DS0 + DS1) ─DS3 and Above (DS3 + OCn)		
Performance Standard	─New Installation Trouble Report Rate ─── < = 1.0 trouble reports per 100 circuits installed		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Meas ure Categ ory Code	Title of the Measure	Appendix	
Appe ndix	H	MAINTENANCE & REPAIR Measurement: SA-9 Failure Rate		
Description		Failure Rate measures the overall quality of the circuits being provided by the BellSouth and is calculated by dividing the number of troubles resolved during the reporting period by the total number of "in service" circuits, at the end of the reporting period, and is then annualized.		
Calculation Methodology		Failure Rate—Annualized: Failure Rate = (a / b)*100 a = Count of trouble reports resolved during a report period b = Number of circuits in service at the end of the report period Failure Rate Annualized = (c / d)*100 c = Average count of trouble reports closed per month during the past 12 months d = Average number of circuits in service per month for the past 12 months		
Business Rules		1. A trouble report/ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation. 2. A trouble is resolved when BellSouth issues notice to the CLEC or IXC Carrier that the circuit has been restored to operating parameters. 3. Where more than one trouble is resolved on a specific circuit during the reporting period, each trouble is counted in the Trouble Report Rate.		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Exclusions	Trouble tickets that are canceled at the CLEC's or IXC Carrier's request CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles BellSouth trouble reports associated with administrative service CLEC or IXC Carrier requests for informational tickets Tickets used to track referrals of misdirected calls		
Levels of Disaggregation	Below DS3 (DS0 + DS1) DS3 and Above (DS3 + OCn) DS0 DS1 DS3 (Non Optical) DS3 (Optical Ocn)		
Performance Standard	Failure Rate Annualized Below DS3 <= 10.0% DS3 and Above <= 10.0%		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	Appendix		
Appendix	H	MAINTENANCE & REPAIR Measurement: SA-10 Mean Time to Restore			
Description		The Mean Time To Restore interval measures the promptness in restoring circuits to operating levels when a problem or trouble is received by BellSouth. Calculation is the elapsed time from the CLEC or IXC Carrier submission of a trouble report to BellSouth to the time BellSouth closes the trouble, less any Customer Hold Time or Delayed Maintenance Time due to valid customer, CLEC, or IXC Carrier caused delays. A breakdown of the percent of troubles outstanding greater than 24 hours, and the Mean Time to Restore of those troubles recorded as NTF / Test OK, is required for diagnostic purposes.		
Calculation Methodology		**Mean Time To Restore:** = Σ [(Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier — Date and Time of Trouble Ticket Received by BellSouth) — (Customer Hold Times)] / (Count of Trouble Tickets Resolved in Reporting Period)] **% Out of Service Greater than 24 hrs:** = [Count of Troubles where (Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier — Date and Time of Trouble Ticket Received by BellSouth) — (Customer Hold Times) is > 24 hrs / (Count of Trouble Tickets Resolved in Reporting Period)] x 100 **Mean Time To Restore — NTF / Test OK:** = Σ [(Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier as NTF /Test OK — Date and Time of Trouble Ticket Referred to BellSouth) — (Customer Hold Times)] /		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	(Count of Trouble Tickets Resolved in Reporting Period as NTF /Test OK)]		
Business Rules	1. A trouble report or trouble ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation.		
	2. Elapsed time is measured on a 24-hour, seven-day per week basis, without consideration of weekends or holidays.		
	3. Multiple reports in a given period are included, unless the multiple reports for the same customer is categorized as "subsequent" (an additional report on an already open ticket).		
	4. "Restore" means to return to the expected operating parameters for the service regardless of whether or not the service, at the time of trouble ticket creation, was operating in a degraded mode or was completely unusable. A trouble is "resolved" when BellSouth issues notice to the CLEC or IXC Carrier that the customer's service is restored to operating parameters.		
	5. Customer Hold Time or Delayed Maintenance Time resulting from verifiable situations of no access to the end user's premises, or other CLEC or IXC Carrier caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.		
Exclusions	- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request.		
	- CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles.		
	- BellSouth trouble reports associated with administrative service.		
	- CLEC or IXC Carrier requests for informational tickets.		
	- Trouble tickets created for tracking and/or monitoring circuits.		
	- Tickets used to track referrals of misdirected calls.		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Levels of Disaggregation	Below DS3 (DS0 + DS1) DS3 and Above (DS3 + OCn) DS0 DS1 DS3 (Non Optical) DS3 (Optical OCn)		
Performance Standard	Mean Time to Restore Below DS3 <= 2.0 Hours DS3 and Above <= 1.0 Hour % Out of Service > 24 Hrs Diagnostic Mean Time to Restore—NTF/ Test OK Diagnostic		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure		
Appendix	H	~~MAINTENANCE & REPAIR~~ ~~Measurement: SA-11 Repeat Trouble Report Rate~~	**Appendix**	
~~Description~~		~~The Repeat Trouble Report Rate measures the percent of maintenance troubles resolved during the current reporting period that had at least one prior trouble ticket any time in the preceding 30 calendar days from the creation date of the current trouble report.~~		
~~Calculation Methodology~~		**~~Repeat Trouble Report Rate:~~** ~~[(Count of Current Trouble Reports with a previous trouble, reported on the same circuit, in the preceding 30 calendar days)] / (Number of Reports in the Report Period) x 100~~		
~~Business Rules~~		~~1. A trouble report or trouble ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation.~~ ~~2. A trouble is resolved when BellSouth issues notice to the CLEC or IXC Carrier that the circuit has been restored to operating parameters.~~ ~~3. If a trouble ticket was closed out previously with the disposition code classifying it as NTF/TOK, then the second trouble must be counted as a repeat trouble report if it is resolved to BellSouth reasons.~~ ~~4. The trouble resolution need not be identical between the repeated reports for the incident to be counted as a repeated trouble.~~		

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SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Exclusions	- Trouble tickets that are canceled at the CLEC's or IXC Carrier's request - CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles - BellSouth trouble reports associated with administrative service - Subsequent trouble reports — defined as those cases where a customer called to check on the status of an existing open trouble ticket		
Levels of Disaggregation	- Below DS3 (DS0 + DS1) - DS3 and Above (DS3 + OCn) - DS0 - DS1 - DS3 (Non Optical) - DS3 (Optical OCn)		
Performance Standards	- Repeat Trouble Report Rate .... Below DS3 <= 6.0% - DS3 and Above <= 3.0%		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**		
Appendix	H	GLOSSARY			

GLOSSARY			**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**
Term	Definition		
Access Service Request (ASR)	A request to BellSouth to order new service, or request a change to existing service, which provides access to the local exchange company's network, under terms specified in the local exchange company's special or switched access tariffs.		
Business Days	Monday through Friday excluding holidays		
CDDD	Customer Desired Due Date		
Customer Not Ready (CNR)	A verifiable situation beyond the normal control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready.		
(SA)	No access to subscriber premises		
(SR)	Customer Not Ready		
(SL)	Customer Requests Later Date		
(SO)	Customer Other		
Facility Check	A pre-provisioning check performed by BellSouth, in response to an access service request, to determine the availability of facilities and assign the installation date.		
Firm Order Confirmation (FOC)	The notice returned from BellSouth, in response to an Access Service Request from a CLEC or IXC Carrier that confirms receipt of the request, that a facility has been made, and that a service request has		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~been created with an assigned due date.~~		
~~NTF~~	~~No Trouble Found~~		
~~Unsolicited FOC~~	~~An Unsolicited FOC is a supplemental FOC issued by BellSouth to change the due date or for other reasons, although no change to the ASR was requested by the CLEC or IXC Carrier.~~		
~~Project~~	~~Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning processes.~~		
~~Query/Reject~~	~~BellSouth response to an ASR requesting clarification or correction to one or more fields on the ASR before an FOC can be issued.~~		
~~Repeat Trouble~~	~~Trouble that reoccurs on the same telephone number/circuit ID within 30 calendar days~~		
~~Supplement ASR~~	~~A revised ASR that is sent to change due dates or alter the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR.~~		
~~TOK~~	~~Test OK~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SQM #	Measure Category Code	Title of the Measure	**Appendix**	
Appe ndix	H	~~Symbols Used In Calculations~~		

		~~Σ~~ ~~A mathematical symbol representing the sum of a series of values following the symbol.~~ ~~-~~ ~~A mathematical operator representing subtraction.~~ ~~+~~ ~~A mathematical operator representing addition.~~ ~~/~~ ~~A mathematical operator representing division.~~ ~~<~~ ~~A mathematical symbol that indicates the metric on the left of the symbol is less than the metric on the right.~~ ~~<=~~ ~~A mathematical symbol that indicates the metric on the left of the symbol is less than or equal to the metric on the right.~~ ~~>~~ ~~A mathematical symbol that indicates the metric on the left of the symbol is greater than the metric on the right.~~ ~~>=~~ ~~A mathematical symbol that indicates the metric on the left of the symbol is greater than or equal to the metric on the right.~~ ~~()~~ ~~Parentheses, used to group mathematical operations which are~~		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~completed before operations outside the parentheses.~~		

Proposed Florida SEEM Plan

AT&T and CLECs Joint Matrix

04-02-10 Update reflects AT&T's understanding of agreements reached as of the final day of the December 16-17, 2009 Commission workshop

Initial Filing 10-30-2009 / Updated 04-02-2010

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

FLORIDA SEEM ADMINISTRATIVE PLAN

Contents			
	Contents	**Page**	**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Appendix F: ~~BellSouth's~~AT&T's **Policy on Reposting of Performance Data and Recalculation of SEEM Payments**...........................~~52~~40

Administrative Plan			
1	**Scope**		
1.1	This Administrative Plan (Plan) includes Service Quality Measurements (SQM) with corresponding Self Effectuating Enforcement Mechanisms (SEEM) to be implemented by ~~BellSouth~~ AT&T pursuant to Order No. ~~PSC-07-0286-PAA-TP~~ (TBD) issued on ~~April 3, 2007~~TBD by the Florida Public Service Commission (the "Commission") in ~~Docket No. 000121A-TP~~(TBD), and as confirmed by Consummating Order No. ~~PSC-07-0395-CO-TP~~(TBD), issued by the Commission on ~~May 7, 2007~~(TBD). Rationale: Throughout the SEEM document, an administrative change is made changing BellSouth to AT&T. Administrative change that will be made to reflect order and date of order to be issued at close of the review.		**Parties Agree.**
1.2	Upon the Effective Date of this Plan, all appendices referred to in this Plan		**Parties Agree.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	will be located on **Error! Hyperlink reference not valid.**the BellSouth Performance Measurements and Analysis PlatformAT&T website at: **Error! Hyperlink reference not valid.**. Rationale: Updated to refer to an AT&T website rather than provide URL that may change.		**AT&T agrees to keep the URL references on this page and reference as "AT&T performance measurement website" on all other pages where this URL applies.**
2	**Reporting**		
2.1	In providing services pursuant to the Interconnection Agreements between BellSouthAT&T and each CLEC, BellSouthAT&T will report its performance to each CLEC in accordance with BellSouth'sAT&T's SQMs and pay remedies in accordance with the applicable SEEM, which are posted on the Performance Measurement ReportsAT&T website. Rationale: Updated to refer to an AT&T website rather than provide URL that may change.		**Parties Agree.**
2.2	BellSouth will make performance reports available to each CLEC on a monthly basis. The reports will contain information collected in each performance category and will be available to each CLEC via the Performance Measurements and Analysis Platform website. BellSouth will also provide electronic access to the raw data underlying the SQMs. Rationale: Moved verbiage specific to SQM to Report Publication Dates section of SQM Plan.		**Parties Agree.**
2.3	Final validated SQM reports will be posted no later than the last day of the month following the data month in which the activity is incurred, or the first business day thereafter. Final validated SQM reports not posted by this time will be considered late. Rationale: Moved verbiage specific to SQM to Report Publication Dates section of SQM Plan.		**Parties Agree.**

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
2.42	Final validated SEEM reports will be posted on the ~~Performance Measurements and Analysis Platform~~AT&T website on the 15th of the month, following the posting of final validated SQM reports for that data month or the first business day thereafter. Rationale: Updated to refer to an AT&T website rather than provide URL that may change.	.	**Parties Agree.**
2.5	~~BellSouth shall pay fines to the Commission, in the aggregate, for all late SQM and SEEM reports in the amount of $2000 per day. Such payment shall be made to the Commission for deposit into the state General Revenue Fund within fifteen (15) calendar days of the end of the reporting month in which the late publication of the report occurs.~~ Rationale: Eliminate to simplify plan. AT&T consistently posts reports on time with no late postings since 2003. Late postings have no impact on level of service provided to CLECs and thus, CLECs' ability to compete.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
2.6	~~BellSouth shall pay fines to the Commission, in the aggregate, for all reposted SQM reports in the amount of $400 per day. If such reposting is associated with any Data Notification, a maximum of ninety (90) days may be deducted from the fine. The circumstances which may necessitate a reposting of SQM reports are detailed in Appendix F, Reposting of Performance Data and Recalculation of SEEM Payments. Such payments shall be made to the Commission for deposit into the state General Revenue Fund within fifteen (15) calendar days of the final publication date of the report or the report revision date.~~ Rationale: Eliminate to simplify plan. Reposting have no impact on level of service provided to CLECs and thus, CLECs ability to compete. Interest is paid for any underpayment of remedies resulting from reposting. Emphasis should be on complete and accurate reports, not fines for efforts to correct data.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
2.7	~~Tier II SEEMS payments and Administrative fines for late and reposted reports will be sent to the Commission. Checks and the accompanying transmittal letter will be postmarked on or before the 15th of the month or the first business day thereafter, when the 15th falls on a non-business day.~~ Rationale: Eliminate references to payments to Commission with elimination of Tier 2 remedy and fines.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
2.83	~~BellSouth~~AT&T shall retain the performance measurement raw data files for a period of 18 months and further retain the monthly reports ~~produced in PMAP~~ for a period of three years. Rationale: Remove reference to PMAP to allow flexibility in the event platform changes in the future.		**Parties Agree.**
2.91	~~BellSouth~~AT&T will provide documentation of late and reposted SQM and SEEM Reports during the reporting month that the data is posted to the website. ~~These notations may be viewed on the Performance Measurements website from the PMAP home page on the Current Month Updates link.~~ Rationale: Remove reference to PMAP to allow flexibility in the event platform changes in the future.		**Parties Agree.**
3	**Review of Measurements and Enforcement Mechanisms**		
3.1	~~BellSouth will participate in annual review cycles. A collaborative work group, which will include BellSouth, interested CLECs and the Commission will review the Performance Assessment Plan for additions, deletions or other modifications. After the first six months of data are available under this version of SEEM, the Florida PSC Staff will have a special one-time workshop to review the operation of the Plan. Thereafter, reviews will be on an annual basis.~~A workshop and/or conference shall be organized and held periodically for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative. Rationale:		**Area for further negotiations by parties.** **Noted below is the Plan language currently under negotiation by the parties.** ~~BellSouth will participate in annual review cycles. A collaborative work group, which will include BellSouth, interested CLECs and the Commission will review the Performance Assessment Plan for additions, deletions or other modifications. After the first six~~

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Proposing to change annual review to periodic as needed. Language mirrors that proposed in the Administrative Changes section of the SQM Plan.		months of data are available under this version of SEEM, the Florida PSC Staff will have a special one-time workshop to review the operation of the Plan. Thereafter, reviews will be on an annual basis. A workshop and/or conference shall be organized and held periodically or at the request of either party for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative. *AT&T agreed to provide the same verbiage regarding Review of Measurements in the SEEM Plan as is in the SQM Plan.*
3.1.1	AT&T may make administrative changes that do not substantively change the Service Quality Measurements or SEEM Administrative Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes. Rationale: Providing language to modify SEEM Plan for administrative changes that do not substantially change the plan to simplify administration of the plan and ensure documentation that is compliant at all times with existing OSS systems and processes.		**Area for further negotiations by parties.** **Noted below is the Plan language currently under negotiation by the parties.** AT&T may make administrative changes that do not substantively change the SQM Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes. An administrative change is one that corrects typographical, spelling, grammatical, or computational errors, updates website addresses and incorporates modifications to architecture implemented in an OSS release following the approved Change Management process. Administrative changes will not change the intent or the plan language of the document. *AT&T agreed to provide the same verbiage regarding Administrative Changes in the SEEM Plan as is in the SQM Plan.*
3.2	In the event a dispute arises regarding the ordered modification or amendment to the SQMs or SEEMs, the parties will refer the dispute to the		**Parties Agree. AT&T withdraws**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~Florida Public Service Commission.~~ As provided in the Florida SEEM Administrative Plan, no changes to remedies/liquidated damages (remedies) or any other term or condition of this Attachment affecting remedies, including but not limited to the level of remedies to be paid by AT&T and the application of a benchmark, shall be made except by the consent of the Parties and shall not be effective until memorialized in an amendment to the Florida SEEM Administrative Plan. Except as otherwise provided in the Florida SEEM Administrative Plan, neither Party shall have a right to seek state regulatory authority jurisdiction or intervention to address any issues affecting remedies. Any dispute concerning remedies or modification to the current remedy plan shall be resolved pursuant to the dispute resolution provisions contained herein.		**proposed change and parties agree to keep "as is" currently worded.** *AT&T agreed to provide the same verbiage regarding Dispute Resolution in the SEEM Plan for the SQM Plan, Appendix B.*
	Rationale: Provide clarification for changes and dispute resolution		
4.0	**Enforcement Mechanisms**		
4.1	**Definitions**		
4.1.4	*Test Statistic and Balancing Critical Value* – means by which enforcement will be determined using statistically ~~valid equations~~methods. The Test Statistic and Balancing Critical Value are set forth in Appendices C, D, and E of this Plan.		**Parties Agree.**
	Rationale: Verbiage change made to comply with mathematical terminology		
4.1.5	*Cell* – grouping of transactions at which like-to-like comparisons are made. For example, all ~~BellSouth~~AT&T retail (POTS) services, for residential customers, requiring a dispatch in a particular wire center, at a particular point in time will be compared directly to CLEC resold (POTS) services for residential customers, requiring a dispatch, in the same wire center, at a similar point in time. When determining compliance, these cells can have a positive or negative Test Statistic. See Appendices C, D and E of this Plan.		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *Parties agreed to remove the reference to POTS.*
	Rationale: Name change from Bellsouth to AT&T. Clarification of example that explains a like-to-like comparison. Like-to-like comparisons necessitates that AT&T compare resold POTS service to retail POTS services. This is **not** a change to SEEM remedy processing.		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.1.6	*Delta, Psi and, Epsilon, and Lambda* – measures of the meaningful difference between ~~BellSouth~~AT&T performance and CLEC performance. For individual CLECs ~~or~~, the Delta (δ) value shall be 0.5 and for the CLEC aggregate the Delta value shall be 0.35. The value for Psi (ψ) shall be 3 for individual CLECs and 2 for the CLEC aggregate. The value for Epsilon (ε) ~~wi~~shall be 4 for individual CLECs and 2.5 for ~~both individual CLECs and~~ the CLEC aggregate. The value of Lambda (λ) shall be 1 for both individual CLECs and the CLEC aggregate. Rationale: Name change from Bellsouth to AT&T. Update the description to include parameter Lambda and the implemented value of Lambda, as well as the mapping of Greek letter symbols to their spelled out names.. This is not a change to SEEM remedy processing. Changed the value of Epsilon for individual CLECs to be 4. Based on justification provided in section D.2.6 of this exhibit, the value for individual CLECs should be larger than for the CLEC aggregate. Aggregate results are based on much larger samples and the truncated Z test is sensitive to the sample size. The choice of Epsilon value follows from the individual to aggregate ratios for the other parameters (0.5 to 0.35 and 3 to 2).		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.1.8	~~Tier 2 Enforcement Mechanisms – fees paid directly to the Florida Public Service Commission or its designee. Tier 2 Enforcement Mechanisms are triggered by three consecutive monthly failures at the submetric level in which BellSouth performance is out of compliance or does not meet the benchmarks for the aggregate of all CLEC data.~~ Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.1.~~11~~10	*Cell Ranking* – placing cells in rank order from highest to lowest, where the cell with the most negative ~~z-score~~Z-Score is ranked highest and the cell with the least negative ~~z-score~~Z-Score is ranked lowest. Rationale: Administrative correction to prior verbiage to provide terminology consistency throughout all parts of the document.		**Parties Agree.**
4.1.~~12~~11	*Cell Correction* – method for determining the quantity of transactions to be remedied, referred to as "affected volume," wherein the cell-level ~~modified z-score~~Z-Score for the highest ranked cell is first changed to zero		**Area to be subject of PSC**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	("corrected") and then the next highest, progressively, until the overall level truncated ~~z-score~~ Z-Score is equal to the Balancing Critical Value ~~or zero~~ as required by the ~~Fee Schedule~~ Remedy Calculation Procedures. Either all of the transactions in a corrected cells are remedied or a prorated share (determined through interpolation) ~~are~~ is remedied. Rationale: Administrative correction to verbiage in prior version of SEEM document for clarification purposes. "Modified" Z pertains only to averages, but cell correction pertains to all three types of measures. Z-Score is a more general term. AT&T SE uses classical Z-Score for rates and proportions. No changes to the SEEM plan. Cell Correction is governed by Remedy Calculation Procedures, not Fee Schedule. No changes to the SEEM plan. Removed "or zero" consistent with the proposal of no remedies between BCV and 0. Rational provided in the changes to Appendix E. Fee Schedule has nothing to do with cell correction. Clarification only. No changes to the SEEM plan.		**Workshop and ultimately staff recommendation.** *CLECs agreed to all AT&T proposed changes as cosmetic except for the change of striking "or zero". AT&T's proposed change regarding Balancing Critical Value or zero is still subject to negotiation/resolution.*
4.2	**Application**		
4.2.1	The application of the Tier-1 ~~and Tier-2~~ Enforcement Mechanisms does not foreclose other legal and regulatory claims and remedies available to each CLEC. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.2.2	Payment of any Tier-1 ~~or Tier-2~~ Enforcement Mechanisms shall not be considered as an admission against interest or an admission of liability or culpability in any legal, regulatory or other proceeding relating to ~~BellSouth~~ AT&T's performance and the payment of any Tier-1 ~~or Tier-2~~ Enforcement Mechanisms shall not be used as evidence that ~~BellSouth~~ AT&T has not complied with or has violated any state or federal law or regulation. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

4.3	Methodology		
4.3.1.3		Tier-1 Enforcement Mechanisms apply on a per transaction basis and will escalate based upon the number of consecutive months that fail for each Enforcement Mechanism Element for which BellSouth has reported non-compliance. Failures beyond Month 6 will be subject to Month 6 fees and an additional flat fee for each month greater than 6. All transactions for an individual CLEC will be consolidated for purposes of calculating Tier-1 Enforcement Mechanisms.	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.3.1.4	For submetrics that are assessed based on Enforcement Measurement Retail Analog compliance criteria, the fee paid for a particular submetric that failed at the Tier-1 level will be differentiated based on two criteria. First, the Tier-1 fee paid will be based on whether the same submetric that failed at the Tier-1 level (CLEC-specific) also failed at the CLEC aggregate level in the same month. Second, the Tier-1 fee paid will be based on whether the transactions in the cells to be remedied correct the overall truncated z-score from the region below the Balancing Critical Value ("BCV") to the BCV or from the BCV to zero. Depending on which of these criteria apply, a different multiplier will be applied to the Fee Schedule (shown in Appendix A, Table 1: Fee Schedule for Tier-1 Per Transaction Fee Determination) to determine the amount of the Tier-1 payments. The chart below shows the applicable multipliers:		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

CLEC Aggregate Performance	Per Transaction Fee Below BCV	Per Transaction Fee Between BCV and 0
Passes	(Fee)*(3/2)	(Fee)*(1/3)
Fails	(Fee)*(3)	(Fee)*(2/3)

No multiplier applies for the Billing Invoice Accuracy measure.

Rationale:

Propose elimination of multipliers.

The additional fees paid to the CLEC as the result of the multiplier are not compensatory with the service impact

- Current Fee Schedule payments, incremented each month for successive misses, are sufficient remedies for actual service impact

The regional performance results for all CLECs does not incrementally impact an individual CLECs results

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

4.3.1.5	For submetrics that are assessed based on Enforcement Measurement Benchmark compliance criteria the fee paid for a particular submetric that failed at the Tier 1 level will be differentiated based on whether the same submetric that failed at the Tier 1 level (CLEC-specific) also failed at the CLEC-aggregate level in the same month. A different multiplier will be applied to the Fee Schedule (shown in Appendix A, Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination) to determine the amount of the Tier 1 payments. The chart below shows the applicable multipliers: 		Area to be subject of PSC Workshop and ultimately staff recommendation.

CLEC Aggregate Performance	Per Transaction Fee
Passes	(Fee)*(3/2)
Fails	(Fee)*(5/2) for Ordering and Flow Through (Fee)*(3) for all other benchmark measures

Rationale:

Propose elimination of multipliers

The additional fees paid to the CLEC as the result of the multiplier are not compensatory with the service impact

o   Current Fee Schedule payments, incremented each month for successive misses, are sufficient remedies for actual service impact

The regional performance results for all CLEC's does not incrementally impact an individual CLECs results

4.3.2	Tier-2 Enforcement Mechanisms will be triggered by BellSouth's failure to achieve applicable Enforcement Measurement Compliance or Enforcement Measurement Benchmarks for the State of Florida for given Enforcement Measurement Elements for three consecutive months. The method of calculation is set forth in Appendices C, D, and E of this Plan. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided for proposed changes to SQM document.		Area to be subject of PSC Workshop and ultimately staff recommendation.
4.3.2.1	Tier-2 Enforcement Mechanisms apply, for an aggregate of all CLEC data generated by BellSouth, on a per transaction basis for each Enforcement		Area to be subject of PSC

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	Mechanism Element for which BellSouth has reported non-compliance. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided for proposed changes to SQM document.		**Workshop and ultimately staff recommendation.**
4.3.2.2	The fee paid for a particular submetric that failed at the Tier 2 level will be as shown in Appendix A, Table 2. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided for proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.3.3	The Market Penetration Adjustments will be applied based on the following provisions to enhance competition for nascent products. In order to ensure parity and benchmark performance where CLECs order low volumes of advanced and nascent services, BellSouth will make additional Tier 1 and Tier 2 payments where performance standards for the following measures are not met, if the measurement applies to the nascent service. • Percent Missed Installation Appointments • Average Completion Interval • Missed Repair Appointments • Maintenance Average Duration • Average Response Time for Loop Make-up Response Time Electronic Information Rationale: Eliminate section to simplify plan. Market Penetration Adjustments put in place to enhance competition for nascent services. No new services or products exist now or for the foreseeable future that can be categorized as nascent.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.3.3.1	~~These additional payments will only apply when there are more than 10 and less than 100 average units in service statewide for the preceding three-month period. The additional payments in the form of a market penetration adjustment will be made if BellSouth fails to provide parity for the above measurements as determined by the use of the Truncated Z- test and the balancing critical value or fails to meet the established benchmark.~~ Rationale: Eliminate section to simplify plan. Market Penetration Adjustments put in place to enhance competition for nascent services. No new services or products exist now or for the foreseeable future that can be categorized as nascent.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.3.3.2	~~BellSouth shall calculate the new Tier 1 and Tier 2 payments, which include the market penetration adjustment by applying the normal method of calculating affected volumes as ordered by the Commission and trebling the normal Tier 1 and Tier 2 remedy.~~ Rationale: Eliminate section to simplify plan. Market Penetration Adjustments put in place to enhance competition for nascent services. No new services or products exist now or for the foreseeable future that can be categorized as nascent.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.3.3.3	~~If, for the three months of data, there were 100 observations or more on average for the sub-metric, then no additional payments under this market penetration adjustment provision will be made. Further, market penetration adjustments shall no longer apply if 24 months have elapsed since the first unit of the nascent service was installed.~~ Rationale: Eliminate section to simplify plan. Market Penetration Adjustments put in place to enhance competition for nascent services. No new services or products exist now or for the foreseeable future that can be categorized as nascent.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.3.3.4	CLECs may file a petition with the Commission in order to add a service to the list of services for which the market penetration adjustment may apply. Rationale: Eliminate section to simplify plan. Market Penetration Adjustments put in place to enhance competition for nascent services. No new services or products exist now or for the foreseeable future that can be categorized as nascent.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.3.3.5	Any payments made under this market penetration adjustment provision are subject to the Absolute Cap set by the Commission. Rationale: Eliminate section to simplify plan. Market Penetration Adjustments put in place to enhance competition for nascent services. No new services or products exist now or for the foreseeable future that can be categorized as nascent.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.3. 42	For Tier-1, and Tier 2 evaluations, the retail analog or benchmark are is the same as for the SQM. See the SQM for SEEM retail analogs and benchmarks. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document. Verbiage change for clarity		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.4	**Payment of Tier-1 and Tier 2 Amounts**		
4.4.1	If BellSouthAT&T performance triggers an obligation to pay Tier-1 Enforcement Remedy Mechanisms to a CLEC or an obligation to remit Tier-2 Enforcement Mechanisms to the Commission or its designee. BellSouth, AT&T shall make payment in the required amount on the CLEC's first bill after the day upon which the final validated SEEM reports are posted on the Performance Measurements and Analysis Platform AT&T website as set forth in Section 2.4 above. AT&T's performance remedy liabilities to an individual CLEC in any month will not exceed (will be capped at) the total monthly billed revenue due AT&T for services provided to the CLEC in the same month for which the remedy		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	liability was incurred.		
	Rationale:		
	Eliminate reference to Tier 2.		
	Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		
	Remove reference to PMAP to allow flexibility in the event platform changes in the future.		
	SEEM remedy should be proportionate to level of failure.		
4.4.3	For each day after the due date that BellSouth fails to pay the required Tier-2 Enforcement Mechanisms, BellSouth will pay the Commission an additional $1,000 per day. If BellSouth pays less than the required amount, BellSouth will pay the Commission 12% simple interest per annum on the difference between the required amount and the amount previously paid. The underpayment and interest will be paid to the Commission in the next month's payment cycle.Remedy caps will be applied to high volume measures and those that are not end user impacting. These measures are:		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
	• Firm Order Confirmation Timeliness		
	• Percent Flow Through Service Requests		
	• Reject Interval		
	• Service Order Accuracy		
	• Trunk Group Performance		
	The caps are a maximum remedy amount payable to a CLEC per measure, per month. These caps may be found in Appendix A, Table 2: Maximum Remedy for Tier-1 Measures with a Cap.		
	Rationale:		
	Eliminate late payment fine to simplify plan.		
	AT&T consistently processes payments promptly – incurred late payments 2 times in past 7 years.		
	Late payments have no impact on level of service provided to CLECs and thus, CLECs ability to compete.		
	Interest will be paid in the event of a late payment.		
	Implement remedy caps for Tier-1 for high volume metrics (FOCT, PFT, RI, SOA, and TGP) and those associated with LSR submissions and		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	processing (all but TGP). Measurements are not sole indicator regarding meeting service commitment to CLEC end user. SEEM remedy should be proportionate to level of failure.		
4.4.5	For Tier-2 Enforcement Mechanisms, if the Commission requests clarification of an amount paid, a written claim shall be submitted to BellSouth within sixty (60) days after the payment date. BellSouth shall investigate all claims and provide the Commission written findings within thirty (30) days after receipt of the claim. If BellSouth determines the Commission is owed additional amounts, BellSouth shall pay such additional amounts within thirty (30) days after its findings along with 12% simple interest per annum. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.4.6.5	Any adjustments for underpayment or overpayment of calculated Tier 1 Tier-1 and Tier 2 remedies will be made consistent with the terms of BellSouth's AT&T's Policy On Reposting Of Performance Data and Recalculation of SEEM Payments, as set forth in Appendix F of this document. If any circumstance necessitating remedy adjustments should occur that is not specifically addressed in the Reposting Policy, such adjustments will be made consistent with the terms defined in Paragraph 6 7 of the Reposting Policy ("AT&T will recalculate applicable SEEM payments, where technically feasible, for a maximum of three months in arrears SEEM payments will be subject to recalculations for a maximum of three months in arrears unless the Florida Commission orders otherwise...."). Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document. Delete reference to Florida Commission as serves no purpose. AT&T will abide by all PSC orders.		**Parties Agree except for resolution of Tier-II elimination that is highlighted. Noted below is the Plan language to which the parties agree.** Any adjustments for underpayment or overpayment of calculated Tier 1 Tier-1 and Tier 2 remedies will be made consistent with the terms of BellSouth's AT&T's Policy On Reposting Of Performance Data and Recalculation of SEEM Payments, as set forth in Appendix F of this document. If any circumstance necessitating remedy adjustments should occur that is not specifically addressed in the Reposting Policy, such adjustments will be made consistent with the terms defined in Paragraph 6 7 of the Reposting Policy (" payments will be subject to recalculations for a maximum of three months in arrears unless the Florida Commission orders otherwise....").

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.4.76	Any adjustments for underpayment or overpayment will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the final paid dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments. Rationale: Remove reference to PARIS to allow flexibility in the event platform changes in the future.		**Parties Agree.**
4.4.87	Where there is a SEEM adjustment, in addition to the submetric, data month(s), and adjustment amount, BellSouthAT&T will include an adjustment code on the CLEC specific Tier 1Tier-1 or Tier 2 PARIS reports on the PMAPAT&T Performance Measurement website. Then, on a separate document under the Exhibits link on the BellSouth PMAPAT&T website, this code will be cross-referenced with a brief narrative description of the adjustment. These codes and descriptions will be applicable to all States states where an adjustment was applied. If there are multiple adjustment codes, the code explanation document can be accessed under the Exhibits linkon the AT&T website that will contain all of the codes and the narrative descriptions for each code. An explanation of the cause of the adjustment and the data months impacted by the adjustment will be included in the narrative. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document. Remove reference to PMAP to allow flexibility in the event platform changes in the future. Remove reference to "Exhibits" link as specific to PMAP website layout and need flexibility for changes in the future.		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**
4.5	**Limitations of Liability**		
4.5.1	BellSouthAT&T will not be obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms for non-compliance with a performance measure if such non-compliance results from a CLECs acts or omissions that cause failed or missed performance measures. These acts or omissions include but are not limited to, accumulation and submission of orders at unreasonable quantities or times, failure to follow publicly available procedures, or failure to submit accurate orders or inquiries. BellSouthAT&T shall provide each CLEC and the Commission with reasonable notice of, and		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	supporting documentation for, such acts or omissions. Each CLEC shall have 10 business days from the filing of such Notice to advise BellSouthAT&T and the Commission in writing of its intent to challenge, through the dispute resolution provisions of this plan, the claims made by BellSouthAT&T. BellSouthAT&T shall not be obligated to pay any amounts subject to such disputes until the dispute is resolved. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		
4.5.2	BellSouthAT&T shall not be obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms (SEEM payments) for non-compliance with a performance measurement if such non-compliance was the result of any Force Majeure Event that either directly or indirectly prevented, restricted, or interfered with performance as measured by the SQM/SEEM Plan. Such Force Majeure Events include non-compliance caused by reason of fire, flood, earthquake or like acts of God, wars, revolution, civil commotion, explosion, acts of public enemy, embargo, acts of the government in its sovereign capacity, labor difficulties, including without limitation, strikes, slowdowns, picketing, or boycotts, or any other circumstances beyond the reasonable control and without the fault or negligence of BellSouthAT&T. BellSouthAT&T, upon giving prompt notice to the Commission and CLECs as provided below, shall be excused from such performance on a day-to-day basis to the extent of such prevention, restriction, or interference; provided, however, that BellSouthAT&T shall use diligent efforts to avoid or remove such causes of non-performance. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.	BellSouth shall not be obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms (SEEM payments) for non-compliance with a performance measurement if such non-compliance was the result of any Force Majeure Event that either directly or indirectly prevented, restricted, or interfered with performance as measured by the SQM/SEEM Plan. Such Force Majeure Events include non-compliance caused by reason of fire, flood, earthquake or like acts of God, wars, revolution, civil commotion, explosion, acts of public enemy, embargo, acts of the government in its sovereign capacity, labor difficulties, including without limitation, strikes, slowdowns, picketing, or boycotts, or any other circumstances beyond the reasonable control and without the fault or negligence of BellSouth. BellSouth, upon giving prompt notice to the Commission and CLECs as provided below, shall be excused from such performance on a day-to-day basis to the extent of such prevention, restriction, or interference; provided, however, that BellSouth shall use diligent efforts to avoid or remove such causes of non-performance. As forseeable events, rain and lightning shall not constitute the basis for a Force Majeure Event unless a disaster is contemporaneously declared by State or Federal goveernment in th earea where the Force Majeure Event also occurs.	**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.5.2.1	To invoke the application of Section 4.5.2 (Force Majeure Event), BellSouthAT&T will provide written notice to the Commission and post notification of such filing on BellSouthAT&T's website wherein BellSouthAT&T will identify the Force Majeure Event, the affected measures, and the, if applicable, the impacted wire centers, including affected NPAs and NXXs. Rationale: Impacted Wire Centers, including affected NPAs and NXXs, are only	To invoke the application of Section 4.5.2 (Force Majeure Event), within Fifteen (15) calendar days of the Force Majeure Event's beginning BellSouth will provide written notice to the Commission and post notification of such filing on BellSouth's website wherein BellSouth will identify the Force Majeure Event, the affected measures, and the impacted wire centers, including affected NPAs and NXXs. Unless the nature of the Force Majeure Event precludes such notice, BellSouth shall report via a web site posting a list of the imapcted	**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	applicable to Force Majeure Events to the Network infrastructure.	wire centers and a list of assocaited trouble reports or held orders within 24 hours of the beginning of the Force Majuere event.	
4.5.2.4	During the pendency of a Force Majeure Event, BellSouthAT&T shall file with the Commission periodic updates of its restoration/recovery progress and efforts as agreed upon between the Commission Staff and BellSouth.AT&T. The Commission Staff will consider reasonable requests from affected carriers on such updates' contents and frequency, including the need for -weekly progress update reports. Additionally, BellSouthfor Force Majeure events directly impacting a geographic area of the network infrastructure, AT&T will post to the Emergency Preparedness and RestorationAT&T website periodic updates of its restoration/recovery progress and efforts. BellSouthAT&T will post at a minimum for the area where Force Majeure has been declared where applicable; the identity of each wire center and associated NPA/NXXs; and the wire centers' color status of wire centers based on the Emergency Preparedness and Restoration guidelines; the total number of BellSouth pending service orders; the total number of CLEC pending service orders; the total number of BellSouth pending trouble reports; and the total number of CLEC pending trouble reports.coded Area Dispatch Status report.

Rationale:

Area Dispatch Status Report provides sufficient information for CLECs to ascertain the status of the restoration and impact to their end users.

Emergency Preparedness and Restoration guidelines were specific to BellSouth and no longer applicable under AT&T structure | | **Area to be subject of PSC Workshop and ultimately staff recommendation.** |
| 4.6 | **Change of Law** | | |
| 4.6.1 | Upon a particular Commission's issuance of an Order pertaining to Performance Measurements or Remedy Plans in a proceeding expressly applicable to all CLECs, BellSouthAT&T shall implement such performance measures and remedy plans covering its performance for the CLECs, as well as any changes to those plans ordered by the Commission, on the date specified by the Commission. If a change of law occurs which may change BellSouthAT&T's obligations, parties may petition the Commission within 30 days to seek changes to the SQM and SEEM plans in accordance with such change of law. Performance Measurements and remedy plans that have been ordered by the Commission can currently be accessed via the AT&T website.at **Error! Hyperlink reference not valid.**. Should there be any difference between the performance measure and remedy plans on BellSouthAT&T's website and the plans the Commission has approved as filed in compliance with its orders, the Commission-approved compliance plan will supersede as of its effective date. | | **Parties Agree.** |

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: Updated to refer to an AT&T website rather than provide URL that may change.		
4.7	Affiliate Reporting		
4.7.1	BellSouth shall provide monthly results for each metric for each BellSouth CLEC affiliate. Upon request, the Florida Public Service Commission shall be provided the number of transactions or observations for BellSouth CLEC affiliates. Further, BellSouth shall inform the Commission of any changes regarding non-CLEC affiliates' use of its OSS databases, systems, and interfaces. Rationale: No restrictions should be placed on AT&T local interfaces nor should OSS be dedicated only to CLECs. AT&T should not be required to report any changes regarding non-CLEC affiliates' use of its OSS databases, systems and interfaces		**Parties Agree.**
4.87	Enforcement Mechanism Cap		
4.87.1	BellSouthAT&T's total liability for the payment of Tier-1 and Tier-2 Enforcement Mechanisms shall be collectively and absolutely capped at 36% of net revenues in Florida, based upon the most recently reported ARMIS data. Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**
4.87.3	If BellSouthAT&T's payment of Tier-1 and Tier-2 Enforcement Mechanisms would have exceeded the cap referenced in this plan, a CLEC may commence a proceeding with the Commission to demonstrate why BellSouthAT&T should pay any amount in excess of the cap. The CLEC shall have the burden of proof to demonstrate why, under the circumstances, BellSouthAT&T should have additional liability. Rationale: Eliminate reference to Tier 2.		**Parties Agree except for resolution of Tier-II elimination that is highlighted.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		
4.98	**Audits**		
4.98.1	BellSouthAT&T currently provides CLECs with certain audit rights as a part of their individual interconnection agreements. If requested ordered by a the Public Service Commission, BellSouthAT&T will agree to undergo a SEEM audit. Unless otherwise agreed between AT&T and the Public Service Commission, t The audit should be conducted by an independent third party auditor. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. Audits will be conducted under the following specifications: Rationale: Updated to provide clarity		**Area for further negotiations by parties.**
4.98.1.1	The cost of one audit per version of the SEEM plan shall be borne by BellSouthAT&T. Rationale: AT&T's exposure to the high cost associated with an audit should be limited.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.98.1.2	Should an independent third party auditor be required, it shall be selected by BellSouthAT&T and the PSC. Rationale: As AT&T has financial responsibility for an audit, then AT&T should be allowed to select the third party auditor.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
4.109	**Dispute Resolution**		
4.109.1	Notwithstanding any other provision of the Interconnection Agreement between BellSouthAT&T and each CLEC, if a any dispute arises regarding BellSouth'sAT&T's performance or obligations pursuant to this Plan, BellSouthAT&T and the CLEC shall negotiate in good faith for a period of thirty (30) days to resolve the dispute. If at the conclusion of the 30 day period, BellSouthAT&T and the CLEC are unable to reach a resolution,		**Parties Agree.** *Parties agreed that the Dispute Resolution verbiage in Appendix B of the SQM Plan should be the same as the verbiage in the SEEM Plan.*

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	then the dispute shall be resolved by the Commission.		
	Rationale:		
	Administrative correction of a typing error in prior version		
4.11.10	**Regional ~~and State~~ Coefficients**		**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**
	Some metrics are calculated for the entire ~~BellSouth~~ AT&T Southeast region, rather than by state. Where these metrics are a ~~Tier 1~~ Tier-1 SEEM submetric, a regional coefficient is calculated to determine the amount of the remedy for the CLEC in each state. For example, the ~~Acknowledgement Completeness~~Percent Flow-Through Service Requests Measurement ~~can be measured~~is evaluated for an individual CLEC, but only at the regional level. In several states it is also a ~~Tier 1~~Tier-1 SEEM submetric. Thus, if there is a failure in this measurement for a CLEC, it is necessary to determine the amount of remedy for the CLEC in each state. A Regional Coefficient is used to do this. (Appendix E, Section E.~~6-4~~ describes the method of calculating the Regional Coefficients.) The amount of ~~Tier~~ remedy for the CLEC in a state is determined by multiplying the regional affected volume by the Coefficient for the state and by the state fee.		
	A state coefficient is calculated to split Tier 2 payments for regional metrics among states by submetric.		
	Rationale:		
	Changed the example to PFT. Refer to SQM Metric to view rational for removal of O-2 [AKC] Acknowledgement Completeness measure		
	Metric is evaluated at the regional level.. Corrected verbiage implying that data for measurement at state level are not available for this metric.		
	State Coefficients are specific to measures with regional scope.		
	Eliminate reference to Tier 2.		
	Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		
Appendix A			
	Fee Schedule		
Table 1:	**Table 1: Fee Schedule for ~~Tier 1~~Tier-1 Per Transaction Fee Determination**	Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination	**Area to be subject of PSC Workshop and ultimately staff recommendation.**

Performa	Month	Month	Month	Month	Month	Mont

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

AT&T's table:

nce Measure	1	2	3	4	5	h 6
OSS/Pre-Ordering	$10	$15	$20	$25	$30	$35
Ordering	$20	$25	$30	$35	$40	$45
Service Order Accuracy	$20	$20	$20	$20	$20	$20
Flow Through	$40	$45	$50	$55	$60	$65
Provisioning – Resale	$40	$50	$70	$100	$130	$200
Provisioning – UNE	$115	$130	$145	$160	$190	$230
Maintenance and Repair – Resale	$40	$50	$70	$100	$130	$200
Maintenance and Repair – UNE	$115	$130	$145	$160	$190	$230
LNP	$115	$190	$385	$460	$535	$615
~~Billing – BIA (see Note 1)~~	~~2%~~	~~2%~~	~~2%~~	~~2%~~	~~2%~~	~~2%~~
~~Billing – BIT~~	~~$7~~	~~$7~~	~~$7~~	~~$7~~	~~$7~~	~~$7~~
~~Billing – BUDT (see Note 2)~~	~~$0.046~~	~~$0.046~~	~~$0.046~~	~~$0.046~~	~~$0.046~~	~~$0.046~~
~~Billing – BEC (see note 3)~~	~~$0.07~~	~~$0.07~~	~~$0.07~~	~~$0.07~~	~~$0.07~~	~~$0.07~~

CLEC's table:

Performance Measure	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6*
OSS/Pre-Ordering	$10	$15	$20	$25	$30	$35
Ordering	$20	$25	$30	$35	$40	$45
Service Order Accuracy	$20	$20	$20	$20	$20	$20
Flow Through	$40	$45	$50	$55	$60	$65
Provisioning – Resale	$40	$50	$70	$100	$130	$200
Provisioning – UNE	$115	$130	$145	$160	$190	$230
Maintenance and Repair – Resale	$40	$50	$70	$100	$130	$200
Maintenance and Repair – UNE	$115	$130	$145	$160	$190	$230
LNP	$115	$190	$385	$460	$535	$615
Billing – BIA (see Note 1)	6~~2~~%	6~~2~~%	6~~2~~%	6~~2~~%	6~~2~~%	6~~2~~%
Billing – BIT	$15~~7~~	$15~~7~~	$15~~7~~	$15~~7~~	$15~~7~~	$15~~7~~
Billing – BUDT (see Note 2)	$0.150~~46~~	$0.150~~46~~	$0.150~~46~~	$0.150~~46~~	$0.150~~46~~	$0.150~~4 6~~

CLECs accepted AT&T's proposal in their response to Action Item No 18 to leave all Billing metrics as is currently structured. It was clarified during workshop discussion that this applied to both the SQM and the SEEM Plan.

Parties agreed to keep the Collocation metrics as is currently structured in the SQM and SEEM Plan.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

AT&T column (first table):

IC Trunks (Trunk Group Performance)	$25	$30	$45	$65	$80	$125
Collocation	$3,165	$3,165	$3,165	$3,165	$3,165	$3,165

~~Note 1: Reflects percent interest to be paid on adjusted amounts.~~

~~Note 2: Amount paid per 1000 usage records.~~

~~Note 3: Amount paid per dispute.~~

Rationale:

Refer to SQM Metric to view rationale for removal of Billing measure

CLEC column (first table):

Billing – BEC (see note 3)	~~$50.00~~ 0.07	~~$50.00~~ 0.07	~~$50.00~~ 0.07	~~$50.00~~ 0.07	~~$50.00~~ 0.07	~~$50,000~~ 07
IC Trunks (Trunk Group Performance)	$25	$30	$45	$65	$80	$125
Collocation	$3,165	$3,165	$3,165	$3,165	$3,165	$3,165

Note 1: Reflects percent interest to be paid on adjusted amounts.
Note 2: Amount paid per 1000 usage records.
Note 3: Amount paid per dispute.

*All consecutive month failures greater than 6 shall have an additional fee of $1,000.00 per metric in addition the the Fee schedule applied

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Table 2

AT&T column:

~~Table 2: Tier 2 Per Transaction Fee Determination~~

Measure	Retail Analogs			Benchmarks
	BCV	Betwee	Below	
~~OSS/Pre Ordering (note~~	$6		-	$30
~~Ordering Average~~	$6			
~~Ordering~~		-	-	$60
~~Service Order Accuracy~~		-	-	$60
~~Flow Through~~		-	-	$120
~~Provisioning Resale~~		$26	$120	-
~~Provisioning UNE~~		$76	$345	$345
~~Maintenance and Repair~~		$26	$120	-
~~Maintenance and Repair~~		$76	$345	-
~~LNP~~		$36	$165	-
~~Billing BIA (note 1)~~	1.3%		-	-
~~Billing BIT (note 1)~~	$4		-	-
~~Billing BUDT (note 1)~~	$.03		-	-

CLEC column:

Table 2: Tier 2 Per Transaction Fee Determination

Measure	Retail Analogs			Benchmarks
	BCV not Applicable	Between BCV and 0	Below BCV	
OSS/Pre Ordering (note 1)	$6		-	$30
Ordering- Average Answer Time (OAAT) (note 1)	$6			
Ordering		-	-	$60
Service Order Accuracy		-	-	$60
Flow Through		-	-	$120
Provisioning – Resale		$26	$120	-
Provisioning – UNE		$76	$345	$345
Maintenance and Repair – Resale		$26	$120	-
Maintenance and Repair – UNE		$76	$345	-
LNP		$36	$165	-
Billing – BIA (note 1)	1.30%		-	-
Billing – BIT (note 1)	$415		-	-

Combined Collaborative Comments column:

Area to be subject of PSC Workshop and ultimately staff recommendation.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	Billing – BEC (note 1)	$0.04		-	-
	Change Management		-	-	$1,000
	IC Trunks (Trunk Group		$16	$75	$75
	Collocation		-	-	$9,495

Note 1: The truncated Z does not apply to these measures

Rationale:

Eliminate reference to Tier 2.

Rationale for elimination of Tier 2 provided in proposed changes to SQM document.

Billing – BUDT (note 1)	$.03.15		-	-
Billing – BEC (note 1)	$0.0450.00		-	-
Change Management		-	-	$1,000
IC Trunks (Trunk Group Performance)		$16	$75	$75
Collocation		-	-	$9,495

Table 2:

Maximum Remedy for Tier-1 Measures with a Cap

(Applies to FOCT, FT, RI, SOA and TGP)

Performance Measure	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
All Measures with a Cap	$10,000	$20,000	$30,000	$40,000	$50,000	$60,000

Rationale:

Implement remedy caps for Tier-1 for high volume metrics and those associated with LSR submissions and processing.

Measurements are not sole indicator regarding meeting service commitment to CLEC end user.

SEEM remedy should be proportionate to level of failure.

Area to be subject of PSC Workshop and ultimately staff recommendation.

Appendix B

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	SEEM Submetrics		

| B.1 ~~Tier-1~~Tier-1 Submetrics | Item No. | SQM Ref | ~~Tier-1~~Tier-1 Submetric | B.1 Tier 1 Submetrics [ADDED TO EXISTING TABLE B.1] | **Area to be subject of PSC Workshop and ultimately staff recommendation.** *Parties agreed to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.* |

Item No.	SQM Ref	~~Tier-1~~Tier-1 Submetric
~~1~~	~~LMT~~	~~PO-2 Loop Makeup – Response Time – Electronic – Loop~~
~~2~~	~~AKC~~	~~O-2 Acknowledgement Message Completeness – Acknowledgments~~
~~31~~	FT	O-3 Percent Flow-Through Service Requests ~~– Business~~
~~4~~	~~FT~~	~~O-3 Percent Flow-Through Service Requests – LNP~~
~~5~~	~~FT~~	~~O-3 Percent Flow-Through Service Requests – Residence~~
~~6~~	~~FT~~	~~O-3 Percent Flow-Through Service Requests – UNE-L (includes UNE-L with LNP)~~
~~72~~	RI	O-8 Reject Interval – Fully Mechanized
~~83~~	RI	O-8 Reject Interval – Partially Mechanized
~~94~~	RI	O-8 Reject Interval – Non Mechanized
~~105~~	FOCT	O-9 Firm Order Confirmation Timeliness - Fully Mechanized
~~116~~	FOCT	O-9 Firm Order Confirmation Timeliness - Partially Mechanized
~~127~~	FOCT	O-9 Firm Order Confirmation Timeliness - Non Mechanized
~~138~~	FOCT	O-9 Firm Order Confirmation Timeliness – Local Interconnection Trunks

OSS-1	[AR]	OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)
O-12	[OAAT}	Average Answer Time-Ordering Centers
P-5	[CNI]	Average Completion Notice Interval
CM-1	[NT]	Timeliness of Change Management Notices
CM 3	[DT]	Timeliness of Documentation Associated with Change
CM-5	[ION]	Notification of CLEC Interface Outages
CM-6	[SEC]	Percentage of Software Errors Corrected in "X" Business Days
CM-7	[CRA	Percentage of Change Requests Accepted or Rejected within 10 Business Days
CM-8	[CRR]	Percent Change Requests Rejected
CM-11	[SCR}	Percentage of Software

SEEM Section	AT&T's Filed Proposed Changes/Rationale					CLEC's Filed proposed Changes/Rationale			Combined Collaborative Comments
	14	FOCC	O-11 FOC & Reject Response Completeness – Fully Mechanized					Change Requests Implemented with 60 days of Prioritization	
	15	FOCC	O-11 FOC & Reject Response Completeness – Partially Mechanized					Average Time Required to Update 911 Database (Facility Based Providers)	
	16	FOCC	O-11 FOC & Reject Response Completeness – Non-Mechanized					Per Cent Database Accuracy	
	179	MIA	P-3 Percent Missed Installation Appointments – Resale POTS					911 Average Time to Clear Errors	
	810	MIA	P-3 Percent Missed Installation Appointments – Resale Design					Percentage of Updates Completed into the DA Database within 72 hours for Facility Based CLECs	
	911	MIA	P-3 Percent Missed Installation Appointments – UNE Loops – Design						
	912	MIA	P-3 Percent Missed Installation Appointments – UNE Loops – Non-Design					Directory Assistance-Database Update Accuracy	
	413	MIA	P-3 Percent Missed Installation Appointments – UNE xDSL and Line Splitting		OSS-2	[IA]	OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair		
	22	MIA	P-3 Percent Missed Installation Appointments – UNE Line Splitting						
	314	MIA	P-3 Percent Missed Installation Appointments – LNP Standalone		P-2A	[PJ48]	Percentage of Orders Given Jeopardy Notices >= 48 Hours		
	415	MIA	P-3 Percent Missed Installation Appointments – Local Interconnection Trunks		C-2	[AT]	Collocation Average Arrangement Time		
	25	OCI	P-4 Order Completion Interval (OCI) – Resale POTS						
	26	OCI	P-4 Order Completion Interval (OCI) – Resale Design						

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

27	OCI	P-4 Order Completion Interval (OCI) – UNE Loop Design		
28	OCI	P-4 Order Completion Interval (OCI) – UNE Loop Non-Design		
29	OCI	P-4 Order Completion Interval (OCI) – UNE xDSL – without conditioning		
30	OCI	P-4 Order Completion Interval (OCI) – UNE xDSL – with conditioning		
31	OCI	P-4 Order Completion Interval (OCI) – UNE Line Splitting Dispatch		
32	OCI	P-4 Order Completion Interval (OCI) – UNE Line Splitting Non-Dispatch		
33	OCI	P-4 Order Completion Interval (OCI) – Local interconnection Trunks		
34	OCI	P-4 Order Completion Interval (OCI) – UNE EELS		
516	CCI	P-7 Coordinated Customer Conversions – Hot Cut Durations		
617	CCT	P-7A Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval		
718	NCDD	P-7D Non-Coordinated Customer Conversions – Percent Completed and Notified on Due Date		
819	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – Resale POTS		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	420	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – Resale Design		
	421	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE Loops - Design		
	422	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE Loops – Non-Design		
	223	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE xDSL and Line Splitting		
	43	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE Line Splitting – Dispatch		
	44	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE Line Splitting – Non-Dispatch		
	524	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – Local Interconnection Trunks		
	625	SOA	P-11 Service Order Accuracy - Resale		
	47	SOA	P-11 Service Order Accuracy - UNE		
	426	LOOS	P-13B LNP – Percent Out of Service < 60 Minutes - LNP		
	49	LAT	P-13C LNP Percent of Time BellSouthAT&T Applies the 10-Digit Trigger Prior to the LNP Order		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

			Due Date – LNP (Standalone)		
	427	LDT	P-13D LNP – Disconnect Timeliness (Non-Trigger)		
	428	MRA	MR-1 Percent Missed Repair Appointment – Resale POTS		
	229	MRA	MR-1 Percent Missed Repair Appointment – Resale Design		
	330	MRA	MR-1 Percent Missed Repair Appointment – UNE Loops Design		
	431	MRA	MR-1 Percent Missed Repair Appointment – UNE Loops Non-Design		
	532	MRA	MR-1 Percent Missed Repair Appointment – UNE xDSL and Line Splitting		
	56	MRA	MR-1 Percent Missed Repair Appointment – UNE Line Splitting		
	733	MRA	MR-1 Percent Missed Repair Appointment – Local Interconnection Trunks		
	834	CTRR	MR-2 Customer Trouble Report Rate – Resale POTS		
	935	CTRR	MR-2 Customer Trouble Report Rate – Resale Design		
	936	CTRR	MR-2 Customer Trouble Report Rate – UNE Loops Design		
	437	CTRR	MR-2 Customer Trouble Report Rate – UNE Loops Non-Design		
	238	CTRR	MR-2 Customer Trouble Report Rate – UNE xDSL and Line Splitting		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~63~~	~~CTRR~~	~~MR-2 Customer Trouble Report Rate – UNE Line Splitting~~		
	439	CTRR	MR-2 Customer Trouble Report Rate – Local Interconnection Trunks		
	540	MAD	MR-3 Maintenance Average Duration – Resale POTS		
	641	MAD	MR-3 Maintenance Average Duration – Resale Design		
	742	MAD	MR-3 Maintenance Average Duration – UNE Loops Design		
	843	MAD	MR-3 Maintenance Average Duration – UNE Loops Non-Design		
	944	MAD	MR-3 Maintenance Average Duration – UNE xDSL and Line Splitting		
	~~70~~	~~MAD~~	~~MR-3 Maintenance Average Duration – UNE Line Splitting~~		
	445	MAD	MR-3 Maintenance Average Duration – Local Interconnection Trunks		
	246	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days – Resale POTS		
	347	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days – Resale Design		
	448	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE Loops Design		
	549	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE Loops Non-Design		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	650	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE xDSL and Line Splitting		
	77	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE Line Splitting		
	651	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days – Local Interconnection Trunks		
	79	OOS	MR-5 Out of Service (OOS) > 24 hours – Resale POTS		
	80	OOS	MR-5 Out of Service (OOS) > 24 hours – Resale Design		
	81	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE Loops Design		
	82	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE Loops Non-Design		
	83	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE xDSL and Line Splitting		
	84	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE Line Splitting		
	85	OOS	MR-5 Out of Service (OOS) > 24 hours – Local Interconnection Trunks		
	86	BIA	B-1 Invoice Accuracy		
	87	BIT	B-2 Mean Time to Deliver Invoices – CRIS		
	88	BIT	B-2 Mean Time to Deliver Invoices – CABS		
	89	BUDT	B-5 Usage Data Delivery Timeliness		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	90	BEC	B-10 Percent Billing Adjustment Requests (BAR) Responded to within 45 Business Days - State		
	152	TGP	TGP Trunk Group Performance		
	253	MDD	C-3 Collocation Percent of Due Dates Missed		
	Rationale: Refer to metrics for rationale of deleted or changed SQM References				
B.2 Tier 2 Sub-metrics	Item No.	SQM Ref	Tier 2 Submetric		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
	1	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) - LENS/Enhanced Verigate		
	2	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) - TAG/XML		
	3	ARI	OSS-1 OSS Response Interval (Maintenance & Repair)		
	4	IA	OSS-2 OSS Interface Availability (Pre-Ordering/Ordering) - Regional per OSS Interface		
	5	IA	OSS-2 OSS Interface Availability (Maintenance & Repair) - Regional per OSS Interface		
	6	LMT	PO-2 Loop Makeup - Response Time - Electronic - Loop		
	7	AKC	O-2 Acknowledgement Message Completeness - Acknowledgments		

SEEM Section			AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	8	FT	O-3 Percent Flow-Through Service Requests — Business		
	9	FT	O-3 Percent Flow-Through Service Requests — LNP		
	10	FT	O-3 Percent Flow-Through Service Requests — Residence		
	11	FT	O-3 Percent Flow-Through Service Requests — UNE-L (includes UNE-L with LNP)		
	12	RI	O-8 Reject Interval — Fully Mechanized		
	13	RI	O-8 Reject Interval — Partially Mechanized		
	14	RI	O-8 Reject Interval — Non Mechanized		
	15	FOCT	O-9 Firm Order Confirmation Timeliness — Fully Mechanized		
	16	FOCT	O-9 Firm Order Confirmation Timeliness — Partially Mechanized		
	17	FOCT	O-9 Firm Order Confirmation Timeliness — Non Mechanized		
	18	FOCT	O-9 Firm Order Confirmation Timeliness — Local Interconnection Trunks		
	19	FOCC	O-11 FOC & Reject Response Completeness — Fully Mechanized		
	20	FOCC	O-11 FOC & Reject Response Completeness — Partially Mechanized		
	21	FOCC	O-11 FOC & Reject Response Completeness — Non Mechanized		
	22	OAAT	O-12 Average Answer Time — Ordering Centers — CLEC Local Carrier Service Center		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	23	MIA	P-3 Percent Missed Installation Appointments — Resale POTS		
	24	MIA	P-3 Percent Missed Installation Appointments — Resale Design		
	25	MIA	P-3 Percent Missed Installation Appointments — UNE Loops — Design		
	26	MIA	P-3 Percent Missed Installation Appointments — UNE Loops — Non-Design		
	27	MIA	P-3 Percent Missed Installation Appointments — UNE xDSL		
	28	MIA	P-3 Percent Missed Installation Appointments — UNE Line Splitting		
	29	MIA	P-3 Percent Missed Installation Appointments — LNP Standalone		
	30	MIA	P-3 Percent Missed Installation Appointments — Local Interconnection Trunks		
	31	OCI	P-4 Order Completion Interval (OCI) — Resale POTS		
	32	OCI	P-4 Order Completion Interval (OCI) — Resale Design		
	33	OCI	P-4 Order Completion Interval (OCI) — UNE Loop Design		
	34	OCI	P-4 Order Completion Interval (OCI) — UNE Loop Non-Design		
	35	OCI	P-4 Order Completion Interval (OCI) — UNE xDSL — without conditioning		
	37	OCI	P-4 Order Completion Interval (OCI) — UNE xDSL — with conditioning		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	37	OCI	P-4 Order Completion Interval (OCI) — UNE Line Splitting-Dispatch		
	38	OCI	P-4 Order Completion Interval (OCI) — UNE Line Splitting—Non-Dispatch		
	39	OCI	P-4 Order Completion Interval (OCI) — Local interconnection Trunks		
	40	OCI	P-4 Order Completion Interval (OCI) — UNE EELS		
	41	CCI	P-7 Coordinated Customer Conversions — Hot Cut Durations		
	42	CCT	P-7A Coordinated Customer Conversions — Hot Cut Timeliness Percent within Interval		
	43	NCDD	P-7D Non-Coordinated Customer Conversions — Percent Completed and Notified on Due Date		
	44	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion — Resale POTS		
	45	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion — Resale Design		
	46	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion — UNE Loops - Design		
	47	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion — UNE Loops — Non-Design		
	48	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion — UNE xDSL		
	49	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion — UNE		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
			Line Splitting – Dispatch		
	50	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE Line Splitting – Non-Dispatch		
	51	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – Local Interconnection Trunks		
	52	SOA	P-11 Service Order Accuracy – Resale		
	53	SOA	P-11 Service Order Accuracy – UNE		
	54	LOOS	P-13B LNP – Percent Out of Service < 60 Minutes – LNP		
	55	LAT	P-13C LNP Percent of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date – LNP – (Standalone)		
	56	LDT	P-13D LNP – Disconnect Timeliness (Non-Trigger)		
	57	MRA	MR-1 Percent Missed Repair Appointment – Resale POTS		
	58	MRA	MR-1 Percent Missed Repair Appointment – Resale Design		
	59	MRA	MR-1 Percent Missed Repair Appointment – UNE Loops Design		
	60	MRA	MR-1 Percent Missed Repair Appointment – UNE Loops Non-Design		
	61	MRA	MR-1 Percent Missed Repair Appointment – UNE xDSL		
	62	MRA	MR-1 Percent Missed Repair Appointment – UNE Line Splitting		
	63	MRA	MR-1 Percent Missed Repair Appointment – Local Interconnection Trunks		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	64	CTRR	MR-2 Customer Trouble Report Rate—Resale POTS		
	65	CTRR	MR-2 Customer Trouble Report Rate—Resale Design		
	66	CTRR	MR-2 Customer Trouble Report Rate—UNE Loops Design		
	67	CTRR	MR-2 Customer Trouble Report Rate—UNE Loops Non-Design		
	68	CTRR	MR-2 Customer Trouble Report Rate—UNE xDSL		
	69	CTRR	MR-2 Customer Trouble Report Rate—UNE Line Splitting		
	70	CTRR	MR-2 Customer Trouble Report Rate—Local Interconnection Trunks		
	71	MAD	MR-3 Maintenance Average Duration—Resale POTS		
	72	MAD	MR-3 Maintenance Average Duration—Resale Design		
	73	MAD	MR-3 Maintenance Average Duration—UNE Loops Design		
	74	MAD	MR-3 Maintenance Average Duration—UNE Loops Non-Design		
	75	MAD	MR-3 Maintenance Average Duration—UNE xDSL		
	76	MAD	MR-3 Maintenance Average Duration—UNE Line Splitting		
	77	MAD	MR-3 Maintenance Average Duration—Local Interconnection Trunks		
	78	PRT	MR-4 Percent Repeat Customer Troubles		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

			within 30 Days – Resale POTS		
	79	PR1	MR-4 Percent Repeat Customer Troubles within 30 Days – Resale Design		
	80	PR1	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE Loops Design		
	81	PR1	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE Loops Non-Design		
	82	PR1	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE xDSL		
	83	PR1	MR-4 Percent Repeat Customer Troubles within 30 Days – UNE Line Splitting		
	84	PR1	MR-4 Percent Repeat Customer Troubles within 30 Days – Local Interconnection Trunks		
	85	OOS	MR-5 Out of Service (OOS) > 24 hours – Resale POTS		
	86	OOS	MR-5 Out of Service (OOS) > 24 hours – Resale Design		
	87	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE Loops Design		
	88	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE Loops Non-Design		
	89	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE xDSL		
	90	OOS	MR-5 Out of Service (OOS) > 24 hours – UNE Line Splitting		
	91	OOS	MR-5 Out of Service (OOS) > 24 hours – Local Interconnection Trunks		
	92	BIA	B-1 Invoice Accuracy		

SEEM Section	AT&T's Filed Proposed Changes/Rationale			CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	93	BTT	B-2 Mean Time to Deliver Invoices – CRIS		
	94	BTT	B-2 Mean Time to Deliver Invoices – CABS		
	95	BUDT	B-5 Usage Data Delivery Timeliness		
	96	BEC	B-10 Percent Billing Adjustment Requests (BAR) Responded to within 45 Business Days – State		
	97	TGP	TGP Trunk Group Performance		
	98	MDD	C-3 Collocation Percent of Due Dates Missed		
	99	NT	CM-1 Timelines of Change Management Notices – Region		
	100	DT	CM-3 Timeliness of Documentation Associated with Change – Region		
	101	SEC	CM-6 Percentage of Software Errors Corrected in "X" Business Days – Region		
	102	CRA	CM-7 Percentage of Change Requests Accepted or Rejected Within 10 Days – Region		
	103	SCRI	CM-11 Percentage of Software Change Requests Implemented Within 60 Weeks of Prioritization – Region		
	Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.				
Appendix C					

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	Statistical Properties and Definitions		
	The statistical process for testing whether BellSouth's (BST)AT&T's wholesale customers (alternative Competitive lLocal eExchange eCarriers or CLECs) are being treated equally with BSTsAT&T's retail customers involves more than a simple mathematical formula. Three key elements need to be considered before an appropriate decision process can be developed. These are the type of: Data Comparison Performance This section describes the properties of a test methodology and the truncated Z statistic for three types of measures that compare CLEC's performance to AT&T's retail analog. Rationale: Administrative change to clarify that statistical methodology applies only to comparisons with retail analog.		**Parties Agree.**
C.2	**Testing Methodology – The Truncated Z** In summary, many covariates are chosen in order to provide meaningful comparison levels below the submetric level chosen for the parity comparison. This includes such factors as wire center and time of month, as well as order type for provisioning measures. In each comparison cell, a Z statistic is calculated. The form of the Z statistic may vary depending on the performance measure, but it should be distributed approximately as a standard normal, with mean zero and variance equal to one. Assuming that the test statistic is derived so that it is negative when the performance for the CLEC is worse than for the ILEC, a positive truncation is done – i.e. if the result is negative it is left alone, if the result is positive it is changed to zero. A weighted average of the truncated statistics is calculated where a cell's weight depends on the volume of BSTAT&T and CLEC orders in the cell. The weighted average is standardized by subtracting the weighted theoretical mean of the truncated distribution, and this is divided by the standard error of the weighted average. Summaries based on measurement type are given for the calculation of the cell Z statistic. Additionally, there are measures that are compared to a retail analog at least in part where cell definitions do not exist that permit assignment of data for these measures to cells so the truncated Z statistic cannot be calculated. These measures are:	**Testing Methodology – The Truncated Z...** ...As an example of one approach taken for a parity measure that does not use the truncated Z methodology, consider the measure Billing Invoice Accuracy. In Florida, BellSouth calculates results for this measure by subtracting the Absolute Value of Total Adjustments during the current month from the Absolute Value of Total Billed Revenues during the current month then dividing these results by the Absolute Value of Total Billed Revenues during the current month and multiplying these results by 100. The formula is as follows: Invoice Accuracy = [a – b/ a] × 100 a = Absolute Value of Total Billed Revenues during current month b = Absolute Value of Total Billing Related Adjustments during current month	**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T clarified that AT&T did not intend any proposed methodology changes to the SEEM Plan for this section. All changes reflected other proposed changes in the SQM Plan such as the elimination of Billing metrics. AT&T agreed to reinstate sections where the parties have reached agreement such as Billing metrics remaining as is and further agreed to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.*

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Average Response Interval (M&R) Billing Invoice Accuracy Billing Invoice Timeliness Speed of Answer in the Ordering Center In addition, there are two measurements that use retail results 'plus' (2 seconds for OSS response time; 0.5% for Trunk Blocking): resulting in a benchmark standard. These measurements are: OSS Average Response Time & Response Interval (Pre-Ordering) and Trunk Group Performance. As an example of one approach taken for a parity measure that does not use the truncated Z methodology, consider the measure Billing Invoice Accuracy. In Florida, BellSouth calculates results for this measure by subtracting the Absolute Value of Total Adjustments during the current month from the Absolute Value of Total Billed Revenues during the current month then dividing these results by the Absolute Value of Total Billed Revenues during the current month and multiplying these results by 100. The formula is as follows: *Invoice Accuracy = [(a – b)/a] x 100* *a = Absolute Value of Total Billed Revenues during current month* *b = Absolute Value of Total Billing Related Adjustments during current month* A numerical example of the remedy calculation is given below: Example: CLEC DATA Bill Adjustments $14,660.00 Total Billed Revenue $336,529.00 BellSouth DATA Bill Adjustments $6,018,969.26 Total Billed Revenue $484,691,922.40 CLEC Invoice Accuracy Ratio = [(336,529.00-14,660.00)/ 336,529.00] x 100 = 95.64 BST Invoice Accuracy Ratio =	A numerical example of the remedy calculation is given below: Example: CLEC DATA Bill Adjustments $14,660.00 Total Billed Revenue $336,529.00 BellSouth DATA Bill Adjustments $6,018,969.26 Total Billed Revenue $484,691,922.40 CLEC Invoice Accuracy Ratio = [(336,529.00-14,660.00)/ 336,529.00] x 100 = 95.64 BST Invoice Accuracy Ratio = [(484,691,922.40-6,018,969.26)/ 484,691,922.40] x 100 = 98.75 Thus, the calculated values are: CLEC Result = 96% BellSouth Result = 98.75% In Florida once it is determined that the BST percent is higher, BellSouth pays the CLEC according to the Florida Fee Schedule. The calculation would be the difference in the CLEC Invoice Accuracy Ratio and the BST Invoice Accuracy Ratio multiplied by the total CLEC Bill Adjustments. Then multiply the result by 2% (Appendix A: Fee Schedule) • 98.75% - 95.64% = 3.11% • 3.11% x $14,660 = $455.92 • $455.92 x 2% = $9.12 ...	

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	~~[(484,691,922.40-6,018,969.26)/ 484,691,922.40] x 100 = 98.75~~ ~~Thus, the calculated values are:~~ ~~CLEC Result = 96%~~ ~~BellSouth Result = 98.75%~~ ~~In Florida once it is determined that the BST percent is higher, BellSouth pays the CLEC according to the Florida Fee Schedule.~~ ~~The calculation would be the difference in the CLEC Invoice Accuracy Ratio and the BST Invoice Accuracy Ratio multiplied by the total CLEC Bill Adjustments. Then multiply the result by 2% (Appendix A: Fee Schedule)~~ ~~• 98.75% - 95.64% = 3.11%~~ ~~• 3.11% x $14,660 = $455.92~~ ~~$455.92 x 2% = $9.12~~		
	~~Rationale:~~ ~~Administrative change for clarity and compatibility with the formula provided explicitly in Appendix D.~~ ~~Administrative change to remove all state specific references within the SEEM Plan~~ ~~Measures addressed within this text, OSS-1 and O-12, are currently Tier II only remedies. Also reference within this text are the B-1 and B-5 metrics proposed to be deleted.~~		
C.2.1	**Mean Measures** For mean measures, an adjusted, ~~asymmetric~~-modified t statistic is calculated for each like-to-like cell that has at least seven ~~BST~~AT&T and seven CLEC transactions. A permutation test is used when one or both of the ~~BST~~AT&T and CLEC sample sizes is less than seven. The adjusted, ~~asymmetric~~-modified t statistic and the permutation calculation are described in Appendix D, Statistical Formulas and Technical Description.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: Administrative change for clarity and consistency with established terminology. In the SEEM document the same statistic is sometimes referred to as asymmetric t, sometimes as modified t. The modification to the classical Student's t introduces asymmetry, so both are technically correct, but multiple terms are confusing to some readers. AT&T decided to use just one term, the one that is more prevalent in the performance measurements remedy plans nationwide.		*CLECs agreed to all AT&T proposed changes as cosmetic.*
C.2.2	**Proportion Measures** For performance measures that are calculated as a proportion, in each adjustment cell, the cell Z and the moments for the truncated cell Z can be calculated in a direct manner. In adjustment cells where proportions are not ~~close~~ equal to zero or one, and where the sample sizes are reasonably large $(n_{ij}p_{ij}(1-p_{ij}) > 9)$, a normal approximation can be used. In this case, the moments for the truncated Z come directly from properties of the standard normal distribution. If the normal approximation is not appropriate, then the Z statistic is calculated from the hypergeometric distribution. In this case, the moments of the truncated Z are calculated exactly using the hypergeometric probabilities. Rationale: Administrative change for clarity. Telephony proportion metrics are by design always close to 0 or 1 (either in the upper or lower 20%). Large sample normal approximation formulae are well defined only when proportions are **not equal** to zero or one.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
C.2.3	The truncated Z methodology for rate measures has the same general structure for calculating the Z in each cell as proportion measures. For the rate measure "~~C~~ustomer T~~t~~rouble R~~r~~eport R~~r~~ate there ~~are~~ is a fixed number of access lines in service for the CLEC, b_{2j}, and a fixed number for ~~BST~~AT&T, b_{1j}. The modeling assumption is that the occurrence of a trouble is independent between access lines, and the number of troubles in b access lines follows a Poisson distribution with mean $\lambda \cdot b$ where λ is the probability of a trouble per 1 access line and $b (= b_{1j} + b_{2j})$ is the total number of access lines in service. The exact permutation distribution for this situation is approximated by the binomial distribution (the limit for the hypergeometric distribution) that is based on the total number of ~~BST~~AT&T and CLEC		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *CLECs agreed to all AT&T proposed changes as cosmetic.*

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	troubles, n, and the proportion of ~~BST~~AT&T access lines in service, $q_{ij} = b_{1ij}/b$.		
	In an adjustment cell, if the number of CLEC troubles is greater than 15 and the number of ~~BST~~AT&T troubles is greater than 15, and $n_{ij}q_{ij}(1-q_{ij}) > 9$, then a normal approximation can be used. In this case, the moments of the truncated Z come directly from properties of the standard normal distribution. Otherwise, if there are very few troubles, the number of CLEC troubles can be modeled using a binomial distribution with n equal to the total number of troubles (CLEC plus ~~BST~~AT&T troubles~~.~~). In this case, the moments for the truncated Z are calculated explicitly using the binomial distribution.		
	Rationale:		
	Administrative change to emphasize Performance Measure name.		
	Administrative change to correct a technical typo: Lambda times b ($\lambda \cdot b$). No change to the SEEM plan.		
	The exact permutation distribution is not binomial, since two troubles per one line are possible. Also, due to line loss. Binomial model is an approximation. Clarification of the underlying theoretical probability model. No changes to the SEEM plan.		
Appendix D	**Statistical Formulas and Technical Descriptions**		
	We start by assuming that the data are disaggregated so that comparisons of CLEC's performance to AT&T's retail analog are made within appropriate classes or adjustment cells that define "like" observations.		**Parties Agree.**
	Rationale:		
	Administrative change for clarity		
D.1	Notation and Exact Testing Distributions		**Parties Agree.**
	Below, we have detailed the basic notation for the construction of the truncated Z statistic. In what follows the word "cell" should be taken to mean a like-to-like comparison cell that has both at least one ~~(or more)~~ ILEC observation and at least one ~~(or more)~~ CLEC observation...		

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| | ... The exact parity test is the permutation test based on the "modified Z" statistic. For large samples, ~~we~~ one can avoid permutation calculations since this statistic will be normal (or Student's t) to a good approximation. For small samples, where ~~we~~ one cannot avoid permutation calculations, ~~we have found~~it has been determined that the difference between "modified Z" and the textbook "pooled Z" is negligible. ~~We t~~Therefore ~~propose to use~~ the permutation test based on pooled Z for small samples will be used. This decision speeds up the permutation computations considerably, because for each permutation we need only compute the sum of the CLEC sample values, and not the pooled statistic itself...

Rationale:

Administrative change of style. No changes to the SEEM plan. | | |
| D.2.2 | Calculate a Z ~~Value~~ Score (Z_j) for each Cell

... that is, α is the probability that a Student's t random variable with $n_{1j} - 1$ degrees of freedom, is less than...

... over all cells within the submeasure being tested such that all three conditions stated below are true. ~~If no submeasure cells exist that satisfy these conditions, then g = 0.~~

$-\gamma_{1j} > 0$

$n_{1j} > 6$

$n_{1j} \geq n_{3q}$ for all values of j, where n_{3q} is the 3rd quartile of all values of n_{1j}
in cells where the first two conditions are true.

If no submeasure cells exist that satisfy these conditions, then g = 0.

Note, that t_j is the "modified Z" statistic. The statistic T_j is a "modified Z" ~~corrected~~ adjusted for the skewness of the ILEC data...

Rationale:

Administrative changes for clarity. Student's t statistic is a standard statistical terminology.

Formatting change for clarification of the three conditions for the construction of g.

Administrative change for clarity. The "modified Z" defined here adjusts for skewness, but the skewness may not be fully corrected. No change to | | **Area to be subject of PSC Workshop and ultimately staff recommendation.**

CLECs agreed to all AT&T proposed changes as cosmetic. |

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

| | the SEEM plan. | | |

| D.2.3 | Obtain a Truncated Z-Value-Score for each Cell (Z^*_j)

To limit the amount of cancellation that takes place between cell results during aggregation, cells whose results suggest possible favoritism are left alone. Otherwise the cell statistic is set to zero.

This means that positive equivalent Z-value-Scores are set to 0, and negative values are left alone. Mathematically, this is written as
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Rationale:

Administrative change: The term "Z-Value" is replaced by "Z-Score" throughout the document for uniformity. | | **Area to be subject of PSC Workshop and ultimately staff recommendation.**

CLECs agreed to all AT&T proposed changes as cosmetic. |

| D.2.4 | **Calculate the Theoretical Mean and Variance**

...

• If $\min(n_{1j}, n_{2j}) > 6$ for a mean measure, or

$\min\left\{ a_{1j}\left(1 - \frac{a_{1j}}{n_{1j}}\right), a_{2j}\left(1 - \frac{a_{2j}}{n_{2j}}\right) \right\} > 9$ for a proportion measure, or

$\min(n_{1j}, n_{2j}) > 15$ and $n_j q_j (1 - q_j) > 9$ for a rate measure, then...

Rationale:

Administrative changes for clarity to reiterate the alternative conditions for the three types of measures (if A for means, or B for proportions, or C for rates). | | **Area to be subject of PSC Workshop and ultimately staff recommendation.**

CLECs agreed to all AT&T proposed changes as cosmetic. |

| D.2.5 | **Calculate the Overall Test Statistic (Z^T)**

The Balancing Critical Value

There are four key elements of the statistical testing process:

the null hypothesis, H_0, that parity exists between ILEC and CLEC services

the alternative hypothesis, H_a, that the ILEC is giving better service to its own customers

the Truncated Z test statistic, Z^T, and

a critical value, c | | **Area to be subject of PSC Workshop and ultimately staff recommendation.**

CLECs agreed to all AT&T proposed changes as cosmetic. |

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	The decision rule[1] is If $Z^T < c$ then accept H_a. If $Z^T \geq c$ then accept H_0. There are two types of errors possible when using such a decision rule: **Type I Error**(α): Deciding favoritism exists when there is, in fact, no favoritism. **Type II Error**(β): Deciding parity exists when there is, in fact, favoritism. The probabilities of each type of error are: • Type I Error: **Error! Objects cannot be created from editing field codes.** • Type II Error: **Error! Objects cannot be created from editing field codes.** ~~Type I Error:~~ $\alpha = P(Z^T < c \mid H_0)$ ~~Type II Error:~~ $\beta = P(Z^T \geq c \mid H_a)$ We want a balancing critical value, c_B, so that $\alpha = \beta$. It can be shown that. **Error! Objects cannot be created from editing field codes.** where **Error! Objects cannot be created from editing field codes.** **Error! Objects cannot be created from editing field codes.**		

[1] This decision rule assumes that a negative test statistic indicates poor service for the CLEC customer. If the opposite is true, then reverse the decision rule.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

$\Phi(\cdot)$ is the cumulative standard normal distribution function, ~~and~~ $\phi(\cdot)$ is the standard normal density function, and μ and σ are the formal arguments of functions $M(\cdot,\cdot)$ and $V(\cdot,\cdot)$. .

This formula assumes that Z_j is approximately normally distributed within cell j. When the cell sample sizes, n_{1j} and n_{2j}, are small this may not be true. It is possible to determine the cell mean and variance under the null hypothesis when the cell sample sizes are small. It is much more difficult to determine these values under the alternative hypothesis. Since the cell weight, W_j will also be small (see calculate weights section above) for a cell with small volume, the cell mean and variance will not contribute much to the weighted sum. Therefore, the above formula provides a reasonable approximation to the balancing critical value.

The values of m_j and se_j will depend on the type of performance measure.

Mean Measure

For mean measures, one is concerned with two parameters in each cell, namely, the mean and variance. A possible lack of parity may be due to a difference in cell means, and/or a difference in cell variances. One possible set of hypotheses that capture this notion, and take into account the assumption that transactions are identically distributed within cells is:

$H_0: \mu_{1j} = \mu_{2j}, \sigma_{1j}^2 = \sigma_{2j}^2$

$H_a: \mu_{2j} = \mu_{1j} + \delta_j \sigma_{1j}, \sigma_{2j}^2 = \lambda_j \sigma_{1j}^2$

——Where $\delta_j > 0$, $\lambda_j -\geq 1$, ~~and~~ j = 1,....L,~~ (where~~ and parameters δ_j and λ_j corresponds to the ~~delta~~Delta and Lambda values defined in section 4.1.6 of the Administrative Plan~~)~~

Under this form of alternative hypothesis, the cell test statistic Z_j has mean and standard error given by

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and

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Proportion Measure

For a proportion measure there is only one parameter of interest in each cell, the proportion of transaction possessing an attribute of interest. A possible lack of parity may be due to a difference in cell

proportions. A set of hypotheses that take into account the assumption that transactions are identically distributed within cells while allowing for an analytically tractable solution is:

H_0:   Error! Objects cannot be created from editing field codes.

H_a: Error! Objects cannot be created from editing field codes.

(wWhere parameters ψ_j corresponds to the ~~psi~~ Psi values defined in section 4.1.6 of the Administrative Plan)....

... Using the equations above, ~~we see~~it can be shown that Z_j has mean and standard error given by

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and

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...Rate Measure

A rate measure also has only one parameter of interest in each cell, the rate at which a phenomenon is observed relative to a base unit, e.g. the number of troubles per available line. A possible lack of parity may be due to a difference in cell rates. A set of hypotheses that take into account the assumption that transactions are identically distributed within cells is:

H_0: $r_{1j} = r_{2j}$

H_a: $r_{2j} = \varepsilon_j r_{1j}$ $\varepsilon_j > 1$ and $j = 1,\ldots,L$.

(wWhere parameters ε_j corresponds to the ~~epsilon~~ Epsilon values defined in section 4.1.6 of the Administrative Plan)....

Rationale:

Administrative change to provide missing symbols, notation description,

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	punctuation, and verbiage to clarify current statistical process, e.g:. • The decision rule must cover all cases. The selection of "the equal case" is consistent with the definition of the type II error below. • Alpha and Beta are standard symbols for Type I and II errors. Administrative change to align verbiage with text Mu (μ) and Sigma (σ) usually have a special meaning in the context of a normal distribution. They were not earlier explained and refer to the first and second moments of the distributions that are not necessarily normal.. It may be confusing to some readers. No changes to the SEEM plan. The "greater than or equal" sign between the Lambda symbol λ and 1 was omitted in the previous versions of SEEM. .The Lambda parameter description was missing. Verbiage changes for clarity		
D.2.6	**Determining the Parameters of the Alternative Hypothesis** In this section we have indexed the alternative hypothesis of mean measures by two sets of parameters, λ_j and δ_j (where λ_j and δ_j corresponds to the Lambda and dDelta values defined in section 4.1.6 of the Administrative Plan section). Proportion measures are indexed by parameter ψ_j and rate measures by ε_j (these parameters correspond to the Psi and Epsilon of section 4.1.6). A major difficulty with this approach is that more than one alternative will be of interest; for example we may consider one alternative in which all the δ_j are set to a common non-zero value, and another set of alternatives in each of which just one δ_j is non-zero, while all the rest are zero. There are very many other possibilities. Each possibility leads to a single value for the balancing critical value; and each possible critical value corresponds too many sets of alternative hypotheses, for each of which it constitutes the correct balancing value. ... *Parameter Choices for λ_j* – The set of parameters λ_j index alternatives to the null hypothesis that arise because there might be greater unpredictability or variability in the delivery of service to a CLEC customer over that which would be achieved for an otherwise comparable ILEC customer. While concerns about differences in the variability of service are important, it turns out that the truncated Z testing which is being recommended here is relatively insensitive to all but very large values of the λ_j. Put another way, reasonable differences in the values chosen here could make very little difference in the balancing points chosen. Therefore, λ_j parameters have been set to 1.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: Administrative change to provide missing symbols, notation description, and verbiage to clarify current statistical process The values of Lambda parameters have not been memorialized in the SEEM document. The change reflects original (still current) implementation. No changes to the SEEM plan.		
Appendix E	~~BST~~ AT&T SEEM Remedy Calculation Procedures		
E.1.1	**Tier-1 Calculation For Retail Analogs** DETERMINE IF AN INDIVIDUAL CLEC FAILS A ~~TIER 1~~ TIER-1 SUBMETRIC 1. ~~Tier 1~~ Tier-1 is triggered by a monthly failure of any ~~Tier 1~~ Tier-1 Remedy Plan submetric. 2. Calculate the overall test statistic for a CLEC (CLEC1); Example, z^T_{CLEC1} (~~P~~per Statistical Methodology). 3. Calculate the balancing critical value (Example, $^cB_{CLEC1}$) that is associated with the alternative hypothesis (for fixed parameters $\lambda.\delta$, $\psi\Psi$, or ε) for that CLEC. 4. If the overall test statistic is equal to or above the balancing critical value, stop here. That is, if $^cB_{CLEC1} \leq= z^T_{CLEC1}$, stop here. Otherwise, go to step 5. CALCULATE REMEDY PAYMENT FOR CORRECTION OF TEST STATISTIC TO THE BALANCING CRITICAL VALUE 5. Select the cell with the most negative ~~z-value~~ Z-Score (let $i=1,...,I$ with $i=1$ having the most negative ~~z-value~~ Z-Score , $i=2$ having next most negative ~~z-value~~ Z-Score , etc. and with $i=I$ when the criterion in step 7 is fulfilled.) and set its ~~z-value~~ Z-Score to zero ($z_{CLEC1,i} = 0$). 6. Recalculate the overall test statistic for that CLEC with the adjusted data; Example, $z^T_{CLEC1}{}^*$ (~~Per~~ ~~P~~per Statistical Methodology). 7. If the new overall test statistic is equal to or above the balancing critical value, that is, if $^cB_{CLEC1} \leq= z^T_{CLEC1}{}^*$, go to step 8. Otherwise, repeat steps 5 – 6 letting $i = i + 1$. 8. Calculate the Total Affected Volume (TAV) by summing the Total Impacted Volumes (TIV) of each cell whose ~~z-value~~ Z-Score was		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	reset to zero except the last cell changed. The ~~affected~~ impacted volume for the last cell changed should be interpolated by

$$TIV_{CLEC1,J,INT} = (^cB_{CLEC1} - z^T_{CLEC1,J-1}^*) / (z^T_{CLEC1,J}^* - z^T_{CLEC1,J-1}^*)$$ $\times TIV_{CLEC1,J}.$ The result should be rounded up to the next positive integer and added to TAV_{CLEC1}. That is, $TAV_{CLEC1} = TIV_{CLEC1,1} + TIV_{CLEC1,2} + \ldots + TIV_{CLEC1,J-1} + TIV_{CLEC1,J,INT}.$ Note that if $TIV_{CLEC1,J} = 1$ then $TIV_{CLEC1,J,INT} = 1$ and the interpolation step can be omitted. ~~Any transactions that cause the overall test statistic to be between the BCV and zero will be included in the TIV for transactions between the BCV and zero.~~

9. Calculate ~~the below BCV portion of~~ the payment to CLEC1 by multiplying the result of step 8 (TAV_{CLEC1}) by the appropriate dollar amount from the fee schedule. Thus, $CLEC1_{BCV}$ payment $= TAV_{CLEC1} \times$ $\$\$$ from Fee Schedule. Here the fee should be derived from Table 1: Fee Schedule for ~~Tier 1~~ Tier-1 Per Transaction Fee Determination (Appendix A).

~~multiplied by the appropriate factor from section 4.3.1.4. This factor is 3/2 if the CLEC aggregate performance passes and 3 if the CLEC aggregate performance fails.~~

~~CALCULATE REMEDY PAYMENT FOR CORRECTION OF TEST STATISTIC TO ZERO~~

~~10. If the current overall adjusted test statistic (calculated in step 6) is equal to or above zero, that is, if $0 \le z^T_{CLEC1}^2$ for $i = 1$, then go to step 14. 1, Otherwise, go to step 11.~~

~~11. Select the cell with the most negative remaining z-value (let $i = 1, \ldots, J$ with $i=1$ having the most negative z-value, $i=2$ having next most negative z-value, etc. and with $i=J$ when the criterion in step 13 is fulfilled.) and set its z-value to zero ($z_{CLEC1,i} = 0$).~~

~~12. Recalculate the overall test statistic for that CLEC with the adjusted data; Example, $z^T_{CLEC1}^*$ (Per Statistical Methodology).~~

~~13. If the new overall test statistic is equal to or above zero, that is, if $^cB_{CLEC1} \le z^T_{CLEC1}$, go to step 14. Otherwise, repeat steps 11 - 12 letting $i = i+1$.~~

~~14. Calculate the Total Affected Volume (TAV0) by summing the Total Impacted Volumes (TIV0) of each cell whose z value was reset to zero except the last cell changed. The affected volume for the last cell changed should be interpolated by~~

~~$$TIV0_{CLEC1,J,INT} = (0 - z^T_{CLEC1,J-1}^*) / (z^T_{CLEC1,J}^* - z^T_{CLEC1,J-1}^*) \times TIV0_{CLEC1,J} TIV_{CLEC1,J,INT}.$$ The result should be rounded up to the next positive integer and added to $TAV0_{CLEC1}$. That is, $TAV0_{CLEC1} = (TIV_{CLEC1,J} TIV_{CLEC1,J,INT}) + TIV0_{CLEC1,J-1} + TIV0_{CLEC1,J-2} + \ldots + TIV0_{CLEC1,J-1} + TIV0_{CLEC1,J,INT}.$ Note that if $TIV0_{CLEC1,J} = 1$ then~~ | | |

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	TIV$_{CLEC1,INT}$ = 1 and the interpolation step can be omitted. Also, TIV$_{CLEC1}$ – TIV$_{CLEC1,INT}$ is the remaining transactions from TIV$_{CLEC1}$ that were not used in step 8 and if TIV$_{CLEC1}$ = TIV$_{CLEC1,INT}$ then TAV0$_{CLEC1}$ = 0. • Calculate the 0 to BCV portion of the payment to CLEC1 by multiplying the result of step 14 (TAV0$_{CLEC1}$) by the appropriate dollar amount from the fee schedule. Thus, CLEC1$_{0}$ payment = TAV0$_{CLEC1}$ * \$\$from Fee Schedule. Here the fee should be derived from Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination (Appendix A) multiplied by the appropriate factor from section 4.3.1.4. This factor is 1/3 if the CLEC aggregate performance passes and 2/3 if the CLEC aggregate performance fails. _____ _____ CALCULATE TOTAL REMEDY PAYMENT FOR CLEC1 16. The total remedy payment for CLEC1 is found by adding the results from step 9 to the results from step 15. That is CLEC1$_{TOTAL}$ payment = CLEC1$_{BCV}$ payment + CLEC1$_{0}$ payment. Rationale: Administrative corrections to terms and symbol omissions in prior version AT&T proposes to remove calculations between BCV and zero from remedy calculation. There is no added value for adjusting the truncated Z statistic all the way to 0. The use of the balancing alpha–beta error methodology will assures that AT&T will remain accountable for accurately evaluating the performance of each measure. Correcting test values between BCV and zero does not provide balanced results for the determination of remedies. Changes consistent with the removal of remedies based on Z-Score correction between BCV and 0.		
E.1.2	**Example: CLEC1 Percent Repeat Customer Troubles Within 30 Days (PRT) for Resale (DSGN).** **Submeasure Category = Provisioning - Resale** **Failure Month = Month 1** CLEC Aggregate Result = Failed		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *As this is an example, AT&T agreed to incorporate in the example all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.*

n_1	n_C	I_c	Z^T_{CLEC1}	$C_{BCL ECl}$	Order Zeroed Out (I/J)	TA1V (< BCV)	TAV 0 (0 to BCV)

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Cell			$z_{CLEC1,i}$	RANK	z^T_{*CLEC1}			
State	312	27	18	-4.10	-1.22			
1	1	0	0.75					
2	4	2	-0.69	8				
3	3	3	-1.76	3	-0.65ˢ	3	2°	1
4	1	0	0.67					
5	4	3	-1.45	5	~~0.80^^~~	5		1°°
6	3	3	-3.45	1	-2.46	1	3	
7	2	2	-1.81	2	-1.60	2	2	
8	3	2	-1.09	6				
9	1	1	-1.65	4	~~-0.13~~	4		1
10	2	1	-0.84	7				
11	1	0	0.62					
12	2	1	-0.40	9				
Total		18					7	3

ˢNote that after making $z_{CLEC1,i}$ = 0, the overall z^T_{CLEC1}* = -0.65 is greater than the balancing critical value $^C B_{CLEC1}$ = -1.22.

~~^^Note that after making $z_{CLEC1,i}$ = 0, the overall z^T_{CLEC1}* = 0.80 is greater than zero.~~

°For cell#3 the ~~TAV~~ TIV would be calculated with ((-1.22) - (-1.60))/((-0.65) - (-1.60)) × 3 = 1.2 which is rounded up to 2 transactions.

~~°°For cell#5 the TAVO would be calculated with ((0) - (-0.13))/((0.80) - (-0.13)) × 4 = 0.56 which is rounded up to 1 transaction.~~

Remedy payment for $CLEC1_{BCV}$ ~~payment~~ is (7 units) * ($40/unit) ~~* (3 factor) $840 when the CLEC aggregate performance fails. Remedy payment for $CLEC1_u$ payment is (3 units) * ($40/unit) * (2/3 factor) $80~~

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	when the CLEC aggregate performance fails. The total remedy payment is CLEC~TOTAL~ payment = $840 + $80 = $920. $280. Rationale: Propose elimination of multipliers. (Refer to section 4.3 for rationale) Refer to rationale provided for E.1.1 for removal of BCV and zero calculation		
E.2	Tier 2 Calculation For Retail Analogs 1. Tier 2 is triggered by three consecutive monthly failures of any Tier 2 Remedy Plan sub-metric. Determine failure by performing steps 2 – 4 in section E.1.1 for each of the three consecutive months for the aggregate of all CLEC data. If any month passes, no remedies are required. 2. If remedies are required, calculate monthly statistical results and affected volumes for the CLEC aggregate performance for each of the three consecutive months as outlined in steps 5 – 8 and 10 – 14 of section E.1.1. Determine average monthly affected volumes for the rolling 3-month period for both the TAV (remedies required for correcting the test statistic back to the BCV) and the TAV0 (remedies required for correcting the test statistic back to zero). 3. Calculate the payment to State Designated Agency by multiplying average monthly volumes by the appropriate dollar amount from the Tier 2 fee schedule (Appendix A, Table 2: Tier 2 Per Transaction Fee Determination). 4. Therefore, State Designated Agency payment = (average monthly volume TAV * $$ from Fee Schedule) + (average monthly volume TAV0 * $$ from Fee Schedule). Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
E.2.1	Example: STATE-A Percent Provisioning Troubles within X Days - UNE Loops Design Submeasure Category = Provisioning – UNE		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Failure Month = Month 1

CLEC Aggregate Result = Failed all three months

Month 1	n_i	n_C	I_c	$z^T_{CLE c1}$	$^cB_{CLE c1}$		Order Zeroed Out (I/J)	TAV (< BCV)	TAV0 (0- BCV)
State	155	37	8	-5.11	-0.35				
Cell				z_{CLEc1}	RANK	$z^T_{CLE c1}$			
1		3	1	-1.53	5	0.91	5		1^{00}
2		1	0	0.31					
3		2	1	-2.18	3	⁻1.21	3	1	
4		1	1	-4.52	2	⁻2.39	2	1	
5		1	0	0.28					
6		18	1	-0.24	8				
7		5	1	-0.45	7				
8		1	1	-5.39	1	⁻3.74	1	1	
9		4	1	-0.50	6				
10		1	1	-2.14	4	⁻0.04	4	1^0	0

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Total		8					4	1

[A]Note that after making $z_{CLEC1,i} = 0$, the overall $z^{T}_{CLEC1}{}^{*} = -0.04$ is greater than the balancing critical value [C]$B_{CLEC1} = -0.35$.

[AA]Note that after making $z_{CLEC1,J} = 0$, the overall $z^{T}_{CLEC1}{}^{*} = 0.80$ is greater than zero.

[e]For cell#10 the TAV_4 would not be interpolated given that the impacted volume for that cell is only 1.

[ee]For cell#1 the TAV_5 would not be interpolated given that the impacted volume for that cell is only 1.

TAV for month 1 is 4 units, TAV0 for month 1 is 1 unit.

———

———— Submeasure Category = Provisioning – UNE

———— Failure Month = Month 2

———— CLEC Aggregate Result = Failed all three months

2	n_i	n_C	I_c	z^{T}_{CLEC1}	[C]B_{CLEC1}	Order Zeroed Out (I/J)	TAV (< BCV)	TAV0 (0–BCV)
State	175	13	3	-0.94	-0.39			
Cell				$z_{CLEC1,i}$	RANK	z^{T}_{CLEC1}		
1		2	1	-1.58	2			
2		1	0	1.00				

3	1	0	0.25					
4	1	0	0.26					
5	2	0	0.46					
6	1	0	0.20					
7	2	1	-0.71	3				
8	1	1	-4.12	1	0.28^{a}	1	1°	
9	1	0	0.35					
10	1	0	0.50					
Total		3					1	0

^{a}Note that after making $z_{CLEC1,i} = 0$, the overall $z^{T}_{CLEC1}{}^{*} = 0.28$ is greater than the balancing critical value $^{c}B_{CLEC1} = -0.39$. Note that it is also greater than zero. Therefore the total affected volume has been identified.

^{o}For cell#8 the TAV_{i} would not be interpolated given that the impacted volume for that cell is only 1.

TAV for month 2 is 1 unit, TAV0 for month 2 is 0 units.

———— Submeasure Category = Provisioning – UNE

———— Failure Month = Month 3

———— CLEC Aggregate Result = Failed all three months

Month 3	n_{i}	n_{c}	I_{c}	z^{T}_{CLEC1}	$^{c}B_{CLEC1}$	Order Zeroed Out (I/J)	TAV (< BCV)	TAV0 (0 - BCV)
Stat	196	33	8	-	-0.49			

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

Cell			z_{CLEC} c_{1+}	RANK	z^T_{CLEC} c_1		
e			4.76				
1	2	0	0.48				
2	4	1	-2.55	6			
3	2	0	0.57				
4	1	1	-3.00	4	-0.81	4	1
5	1	1	-3.16	2	-2.78	2	1
6	1	0	0.20				
7	1	1	-3.32	1	-3.76	1	1
8	2	1	-3.00	3	-1.78	3	1
9	1	1	-2.92	5	0.18	5	1
10	6	1	-0.41	7			
11	10	1	-0.32	8			
12	1	0	0.24				
13	1	0	0.28				
Total		8				5	0

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	"Note that after making $z_{CLEC1,i} = 0$, the overall $z^T_{CLEC1}* = 0.18$ is greater than the balancing critical value $^CB_{CLEC1} = -0.49$. Note that it is also greater than zero. Therefore the total affected volume has been identified. oFor cell#9 the TAV_5 would not be interpolated given that the impacted volume for that cell is only 1. TAV for month 3 is 5 units, TAV0 for month 3 is 0 units. If the above examples represent performance for each of months 1 through 3, then		
	Rationale: Rationale for elimination of Tier 2 provided in proposed changes to SQM document		
E.2.2			**Area to be subject of PSC Workshop and ultimately staff recommendation.**

State	TAV	TAV0
Month 1	4	4
Month 2	4	0
Month 3	5	0
Average TAV(0) for rolling 3 month period	3.33	0.33
Remedy amount per unit (Appendix A Table 2	$345	$76
Remedy Dollars	$1148.85	$25.08

Example: STATE A Percent Provisioning Troubles within 30 Days UNE Loops Design

The total remedy paid for this Tier 2 submetric is $1148.85 + $25.08 = $1,173.93 which rounds up to $1174.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document		
E.3E.2	**Tier-1 Calculation For Benchmarks** 1. For each CLEC with five or more observations, calculate monthly performance results for the State. 2. CLECs having observations (sample sizes) between 5 and ~~30 will use Table I below.~~ the large sample threshold L will use benchmark adjustment calculations described below. The only exception will be for Collocation Percent Missed Due Dates. a. Large sample threshold is defined as $L = 9/(B \times (1-B))$, rounded to the closest larger integer, where B is the benchmark. Large sample thresholds for some values of benchmarks are shown in the table below. 		Area to be subject of PSC Workshop and ultimately staff recommendation.

Benchmark B	Large Sample Threshold L
90%	100
95%	190
96.5%	267

b.   The Equivalent Minimal Benchmark for sample size n=5, EB(5) is based on the smallest number of failures $k \leq n$, for which the cumulative binomial distribution CBN(k,n,B) exceeds 5%. The failure allowance is at least 1 for small samples.

Nominal Benchmark	Equivalent Minimal Benchmark: EB(5)
90%	60%

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

95%	80%
96.5%	80%

c. For any CLEC sample size n between 5 and L, the Equivalent Benchmark EB(n) is calculated so that the adjustment percent decreases linearly from EB(5) for n=5 to 0 for n=L, resulting in the following formula:

$$EB(n) = B - (B-EB(5)) \times (L-n)/(L-5).$$

d. Effective Benchmark is equal to the nominal Benchmark for large samples and to the Equivalent Benchmark for small samples.

Small Sample Size Table (95% Confidence)

Sample Size	Equivalent 90% Benchmark	Equivalent 95% Benchmark	Sample Size	Equivalent 90% Benchmark	Equivalent 95% Benchmark
5	60.00%	80.00%	18	77.78%	83.33%
6	66.67%	83.33%	19	78.95%	84.21%
7	71.43%	85.71%	20	80.00%	85.00%
8	75.00%	75.00%	21	76.19%	85.71%
9	66.67%	77.78%	22	77.27%	86.36%
10	70.00%	80.00%	23	78.26%	86.96%
11	72.73%	81.82%	24	79.17%	87.50%
12	75.00%	83.33%	25	80.00%	88.00%
13	76.92%	84.62%	26	80.77%	88.46%
14	78.57%	85.71%	27	81.48%	88.89%

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

15	73.33%	86.67%	28	78.57%	89.29%
16	75.00%	87.50%	29	79.31%	86.21%
17	76.47%	82.35%	30	80.00%	86.67%

3.   If the percentage (or equivalent percentage for small samples) meets the benchmark standard, no remedies are required. Otherwise, go to step 4.

4.   Determine the Volume Proportion by taking the difference between the benchmark and the actual performance result.

5.   Calculate the CLEC's Total ~~a~~Affected ~~v~~Volume (TAV) by multiplying the Volume Proportion from step 4 by the Total Impacted CLEC~~+~~ Volume.

6.   Calculate the payment to CLEC~~+~~ by multiplying the result of step 5 by the appropriate dollar amount from the fee schedule (Appendix A, Table 1) ~~times the appropriate multiplier (section 4.3.1.5)~~. That is,

        CLEC~~+~~'s payment = (CLEC's Total Affected Volume~~CLEC+~~ x $$ from Fee Schedule ~~× multiplier~~). ~~For the example that follows, fee amounts are based on an aggregate failure.~~

Rationale:

The large sample threshold L should be higher than 30 and dependent on the Benchmark value B: L = 9/(B×(1-B)). The tighter the benchmark, the larger the large sample threshold L should be. The formula comes from statistical methodology adopted for analog measures (D.2.4, bullet point two). Binomial model (with p=B) approximation applies only when L×B×(1-B)>9.

New adjustment construction criteria for small sample benchmark adjustments:

7.   The adjustment percentage for n=5 is the same as in the current SEEM plan.

8.   The adjustment percentage should decrease with increasing sample size.

9.   The adjustment percentage should vanish at the large sample threshold L.

10. The number of total allowed failures should increase with sample size. Currently it drops at n=31.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	11. The number of allowed failures should be no smaller than 1 for small samples.		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
E.32.1	**Example: CLEC1 Percent Missed Due Dates for Collocations** **Submeasure Category = Collocation** **Failure Month = Month 1** ~~CLEC Aggregate Result = Failed~~		**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**

Table within E.32.1:

	n c	Effective Benchmark	PM DD c	Volume Proportion	Affected Volume	Fee Schedule	~~Fee Multiplier~~	Payout
State	6 0 0	~~>=~~ 95% On Time	92%	.03	18	$3,165		$56,970

Payout for CLEC~~1~~ is (18 units) ~~×~~ ($3165/unit) ~~* (3 factor)~~ = $~~170,910~~56,970.

Rationale:

Administrative change to change the symbols for mathematical operations to more concise version.

Change reflects elimination of multipliers

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
E.43	~~Tier I~~Tier-1 **Calculation For Benchmarks (In The Form Of A Target)** 1. For each CLEC with five or more observations calculate monthly performance results for the State. 2. CLEC~~s~~ having observations (sample sizes) between 5 and ~~30~~ large sample threshold L will use small sample ~~size table~~adjustments as described above. 3. Calculate the interval distribution based on the same data set used in step 1. 4. If the 'percent within' (or equivalent percentage for small samples) meets the benchmark standard, no remedies are required.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	Otherwise, go to step 5. 5. Determine the Volume Proportion by taking the difference between benchmark and the actual performance result. 6. Calculate the Total aAffected vVolume by multiplying the Volume Proportion from step 5 by the Total CLEC+ Volume. 7. Calculate the payment to CLEC+ by multiplying the result of step 6 by the appropriate dollar amount from the fee schedule. That is, CLEC+'s payment = CLEC's Total Affected VolumeCLEC+ ×* $$ from Fee Schedule * multiplier. For the example that follows, assume CLEC aggregate failure. Rationale: Change of language consistent with the proposed change of Benchmark small sample threshold. Change reflects elimination of multipliers		

E.43.1	**Example: CLEC-1 Reject Interval – Fully Mechanized** **Submeasure Category = Ordering** **Failure Month = Month 1** CLEC Aggregate Result = Failed		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *As this is an example, AT&T agreed to incorporate in the example all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.*

Table in E.43.1 cell:

	n_C	Effective Benchmark	Reject Interval	Volume Proportion	Affected Volume	Fee Schedule	Fee Multiplier	Payout
State	600	97% <=← 1 hour	95% <= 1 hour	.02	12	$20		$240

Payout for CLEC+ is (12 units) ×* ($20/unit) * (2.5 factor) = $600 240

Rationale:

Effective Benchmark is equal to the nominal Benchmark for large samples and to the Equivalent Benchmark for small samples.

Administrative change to change the "Effective Benchmark" symbols (<=) for mathematical operations to more concise version.

Change reflects elimination of multipliers

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
E.5	Tier 2 Calculations For Benchmarks Tier 2 calculations for benchmark measures are the same as the Tier 1 benchmark calculations, except they are based on the CLEC aggregate performance and the CLEC aggregate data will have failed for three (3) consecutive months. Rational: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
E.6-1	Regional and State Coefficients This section describes the method of calculating regional and state coefficients Rationale: State Coefficients apply to Tier 2 Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
E.6.1	AKC • Acknowledgement Completeness (AKC_EDI & AKC_TAG) • Regional Coefficient Formula (Tier 1) • Coefficient = (A+B) / (C+D) where: • A = number of valid FOC transactions of the CLEC in the state (fully & partially mechanized) • B = number of valid RI transactions of the CLEC in the state (fully & partially mechanized) • C = total valid FOC transactions of the CLEC in the region (fully & partially mechanized) • D = total valid RI transactions of the CLEC in the region (fully & partially mechanized)		**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	State Coefficient Formula (Tier 2)		
	State Coefficient = (A-B) / (C+D) where:		
	• A = number of valid FOC transactions for all CLECs in the state (fully & partially mechanized)		
	• B = number of valid RI transactions for all CLECs in the state (fully & partially mechanized)		
	• C = total valid FOC transactions in the region (fully & partially mechanized)		
	• D = total valid RI transactions in the region (fully & partially mechanized)		
	Rationale:		
	Refer to SQM Measure for rationale		
	Eliminate reference to Tier 2.		
	Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		
E.6.1.2-1	Percent Flow-Through Service Requests [FT]		**Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.**
	Regional Coefficient Formula (Tier-1)		
	Coefficient = A / B where:		
	A = number of valid Flow Through transactions of the CLEC in the state;		
	B = total valid Flow Through transactions of the CLEC in the region.		
	Percent Flow-Through CLEC Aggregate - Residence (PFT-RES)		
	Percent Flow-Through CLEC Aggregate - Business (PFT-BUS)		
	Percent Flow-Through CLEC Aggregate - UNE-L (includes UNE-L with LNP)		
	Percent Flow-Through CLEC Aggregate - LNP (PFT-LNP)		
	Regional Coefficient Formula (Tier 1)		
	Coefficient = A / B where:		
	A = number of valid FOC transactions of the CLEC in the state (fully mechanized)		
	B = total valid FOC transactions of the CLEC in the region (fully		

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SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	mechanized) State Coefficient Formula (Tier 2) State Coefficient = A / B where: • A = number of valid FOC transactions for all CLECs in the state (fully mechanized) • B = total valid FOC transactions in the region (fully mechanized) Rationale: PFT changes made to reflect SQM Disaggregation changes, removal of Tier-2, and current implementation of apportionment based on state Flow Through Eliminate reference to Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		
E.4.2	Service Order Accuracy [SOA] Regional Coefficient Formula (Tier-1) Coefficient = A / B where: A = number of valid SOA transactions of the CLEC in the state; B = total valid SOA transactions of the CLEC in the region. Rationale: SOA was omitted from this paragraph in prior versions of SEEM. Entry is to correct that omission and match current proposed measure.		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *This is an omission in SEEM Plan documentation. With respect to this omission, AT&T agreed to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.*
E.6.3	CMN, PSEC, PCRAR, PCRIP Timeliness of Change Management (CMN) Percent of Software Errors Corrected in X (10, 30, 45) Business Days - Region (PSEC) Percent Change Requests Accepted or Rejected in 10 Days - Region (PCRAR) Percent of Change Request Implemented Within 60 Weeks of Prioritization Region (PCRIP)		**Area to be subject of PSC Workshop and ultimately staff recommendation.** *AT&T agreed to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.*

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	State Coefficient Formula (Tier 2)		
	Coefficient = (A+B) / (C+D) where:		
	A = number of valid FOC transactions for all CLECs in the state (fully & partially mechanized)		
	B = number of valid RI transactions for all CLECs in the state (fully & partially mechanized)		
	C = total valid FOC transactions in the region (fully & partially mechanized)		
	D = total valid RI transactions in the region (fully & partially mechanized)		
	Rationale:		
	Refer to SQM Measure for rationale		
	Eliminate reference to Tier 2.		
	Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		
E.6.4	IA, OAAT		**Area to be subject of PSC Workshop and ultimately staff recommendation.**
	• Interface Availability (IA)		
	• Average Answer Time - Ordering Centers (OAAT)		*AT&T agreed to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.*
	State Coefficient Formula (Tier 2)		
	Coefficient = (A+B) / (C+D) where:		
	• A = number of valid FOC transactions for all CLECs in the state (fully & partially mechanized)		
	• B = number of valid RI transactions for all CLECs in the state (fully & partially mechanized)		
	• C = total valid FOC transactions in the region (fully & partially mechanized)		
	• D = total valid RI transactions in the region (fully & partially mechanized)		
	Rationale:		
	State Coefficient used for Tier 2		
	Eliminate reference to Tier 2.		
	Rationale for elimination of Tier 2 provided in proposed changes to SQM document.		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

| Appendix F | ~~BellSouth's~~AT&T's **Policy on Reposting of Performance Data and Recalculation of SEEM Payments** | | |

	~~BellSouth~~AT&T will be required to repost~~make available reposted~~ performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments ~~using the Parity Analysis and Remedy Information System (PARIS)~~, to the extent technically feasible, under the following circumstances:	BellSouth will make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:	**Parties Agree. Noted below is the Plan language to which the parties agree except for resolution of Tier-II elimination that is highlighted.**
	1. Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics are subject to reposting. A notice will be placed on the ~~PMAP~~ AT&T Performance Measurement website advising CLECs when reposted data is available.	1. Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics are subject to reposting. A notice will be placed on the PMAP website advising CLECs when reposted data is available.	**Appendix F:** ~~BellSouth's~~AT&T's **Policy on Reposting of Performance Data and Recalculation of SEEM Payments**
	2. SQM Performance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting, unless such a shift was caused by a single misclassified observation either in the numerator, denominator, or both.	2. SQM Performance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting.	~~BellSouth~~AT&T will be required to repost~~make available reposted~~ performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments ~~using the Parity Analysis and Remedy Information System (PARIS)~~, to the extent technically feasible, under the following circumstances:
	3. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an "out of parity" condition will be available for reposting whenever there is a >= 2% decline in ~~BellSouth's~~ AT&T's performance at the sub-metric level, unless such a shift was caused by a single misclassified observation either in the numerator, denominator, or both.	3. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an "out of parity" condition will be available for reposting whenever there is a >= 2% decline in BellSouth's performance at the sub-metric level.	1. Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics to reposting. A notice will be placed on the ~~PMAP~~ AT&T performance measurement website advising CLECs when reposted data is available.
	4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of ~~>~~<= .5 in the ~~z~~Z-~~S~~score at the sub-metric level.	4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of <= .5 in the z-score at the sub-metric level.	2. SQM Peformance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting.
	5. Any data recalculations that reflect an improvement in ~~BellSouth's~~ AT&T's performance will be reposted at ~~BellSouth's~~ AT&T's discretion. ~~However, statewide performance must improve by at least 2% for benchmark measures and the z-score must improve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting.~~	5. Any data recalculations that reflect an improvement in BellSouth's performance will be reposted at BellSouth's discretion. However, statewide performance must improve by at least 2% for benchmark measures and the z-score must improve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting.	3. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an "out of parity" condition will be available for reposting whenever there is a >=2% decline in ~~BellSouth's~~AT&T's performance at the sub-metric level.
	6. ~~S~~SQM Performance data will be reposted for a maximum of three months in arrears from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, ~~BellSouth~~AT&T will correct the data beginning with the month of detection (May) and the three months preceding – April, March and February.	6. SQM Performance data will be reposted for a maximum of three months ~~in arrears from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, BellSouth will correct the data beginning with the month of detection (May) and the three months preceding – April, March and February.~~	4. SQM Performance sub-metric calculations with retail
	7. When updated SQM performance data has been reposted or	7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears. ~~from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted.~~ The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same	

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	when a payment error ~~in PARIS~~ has been discovered, ~~BellSouth~~AT&T will recalculate applicable SEEM payments, where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error ~~in PARIS~~ will be determined in the same manner previously described for the SQM. For example, should an error ~~in PARIS~~ be discovered for the data month of May, ~~BellSouth~~AT&T will correct data for May and the three preceding months – April, March and February. 8. Any adjustments for underpayment of ~~Tier 1~~Tier-1 ~~and Tier 2~~ calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of ~~Tier 1~~Tier-1 ~~and Tier 2~~ remedies will be made at ~~BellSouth's~~ AT&T's discretion. 9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month ~~PARIS~~ reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments. When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting ~~BellSouth~~ AT&T to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items 3 ~~or,~~ 4, ~~or 5~~ have been met at the CLEC-specific level. Rationale: Remove reference to PMAP and PARIS to allow flexibility in the event platform changes in the future. Omission or addition of one transaction may change the outcome for the state metrics if the sample size is small. However such a change is hardly material, especially that SQM Equity determination is based on totally different set of statistical test formulae than the SEEM plan determination of compliance. Remedies are recalculated every time a change in data is discovered. It must be noted that a change that is immaterial based on SQM reposting criteria may yield higher remedies. Administrative change to correct typo errors in prior versions of SEEM Plan	manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of May, BellSouth will correct data for May and the three preceding months – April, March and February. 8. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 and Tier 2 remedies will be made at BellSouth's discretion. 9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments. When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting BellSouth to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items 3, 4, or 5 have been met at the CLEC-specific level.	analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of $>\le$ .5 in the $\ne Z$-Sscore at the sub-metric level. 5. Any data recalcualtions that reflect an improvement in ~~BellSouth's~~AT&T's performance will be reposted at ~~BellSouth's~~AT&T's discretion. ~~However, statewide performance must improve by at least 2% for benchmark measures and the z-score must imporve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting.~~ 6. SQM Performance data will be reposted for a maximum of three months in arrears from implementation of the change of programming request requirement (RQ) which corrects a detected error.~~date of detection.~~ RQs shall not be unreasonably delayed after the date the error is detected. As an example, ~~should~~ an error is~~be~~ discovered during the analysis of the May data month peformance that triggers a reposting, ~~and this error triggers a reposting~~but the RQ correcting the error is implemented in the calendar month of July with the June data month performance reports, ~~BellSouth~~AT&T will correct the data beginning with the month of the RQ implementation (July)~~detection (May)~~, which would be for the June data month performance reports, and will repost the data month performance reports for the three months preceding data month performance reports – May, April, and March~~and February~~. 7. When updated SQM performance data has been reposted or when a payment error ~~in PARIS~~ has been discovered, ~~BellSouth~~AT&T will recalculate applicable SEEM payments, where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error ~~in PARIS~~will be determined in the same manner previously described for the SQM. For example, should an

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

| | This condition is not a true measure of performance levels. The same numerical criteria for improvement of performance as for deterioration of performance are much harder to achieve while moving towards the heavier part of the distribution.

Eliminate reference to Tier 2.

Rationale for elimination of Tier 2 provided in proposed changes to SQM document.

Remove reference to specific system to allow flexibility for possible future platform changes | | error in PARIS be discovered for the data month of June May, BellSouthAT&T will correct data for May and the three preceding months – May, April, and March and February.

8. Any adjustments for underpayment of Tier 1Tier-1 and Tier 2 calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1Tier-1 and Tier 2 remedies will be made at BellSouth's AT&T's discretion.

9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.

When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting BellSouth AT&T to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items 3 or, 4, or 5 have been met at the CLEC-specific level. |
| | **Determination of when Reposting Policy Applies**

As part of the Change Notification Process, BellSouth AT&T performs an analysis of impacts that are proposed to be made to Performance Measurement Application Platform (PMAP) code. These impacts are used to identify changes to its reported SQM results.

To determine this impact, BellSouth AT&T performs a query of the data warehouse to identify those records that would be impacted by the proposed change. Once the number of records are identified, the | | **Parties Agree.** |

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments

	measurement is recalculated to determine the impact. This is the general framework for analysis - the specific steps used to evaluate the impact will vary with the issue being analyzed. However, the following example may assist in understanding:		
	Assume that service orders were erroneously being included in a particular product disaggregation for Percent Missed Installation Appointments. They should have been in another product disaggregation. Further, assume that the number of records erroneously included is 110 records out of a total of 86,000. In this example, the numerator and denominator would both be reduced by 110 records and the z-s/ Score would be recalculated. If the amount of the change was sufficient to meet criteria 2, 4 or 5 above, the Reposting policy will be invoked.		
	Rationale: • Remove reference to PMAP to allow flexibility in the event platform changes in the future.		
End of SEEM Section			