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March 21, 2001

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121-TP (OSS)

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of David A. Coon, Cynthia K. Cox, Wylie G. (Jerry) Latham, Edward J. Mulrow, Ph.D., Ronald M. Pate, and Dr. William E. Taylor, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver (KA)

Enclosures

cc: All parties of record
Marshall M. Criser, III
Nancy B. White
R. Douglas Lackey

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CERTIFICATE OF SERVICE
Docket No. 000121-TP

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BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF DAVID A. COON

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 000121-TP

MARCH 21, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS ADDRESS.

A. My name is David A. Coon. I am employed by BellSouth as Director – Interconnection Services for the nine-state BellSouth region. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. ARE YOU THE SAME DAVID COON WHO FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes I am.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to certain issues raised by ALEC witnesses Ms. Cheryl Bursh, Ms. Karen Kinard, and Mr. Tom Allen in this proceeding in their direct testimonies.

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Q. PLEASE SUMMARIZE YOUR REBUTTAL.

A. My rebuttal testimony will address four major points. These major points are as follow:

- The ALECs propose an absurd number of performance measurements that go far beyond the most extreme definition of what is necessary for this Commission to satisfy itself that BellSouth is providing non-discriminatory performance to the ALECs. In addition, the proposed standards, either retail analogs or benchmarks, are arbitrary.
- The ALECs' proposal involves a level of complexity and volume that would make it virtually impossible to implement in any reasonable timeframe.
- The ALECs' proposal also includes requirements for additional audits that as a practical matter simply cannot be accomplished.
- The ALECs' enforcement plan goes far beyond any reasonable attempt to provide additional incentives to perform. In fact, the ALECs' plan is so excessive that the enforcement mechanism becomes a major new revenue stream for the ALECs even if BellSouth is providing a non-discriminatory level of service to the ALECs.

The following section is associated with Issues 1A, 1B, 2A, 2B, 3A, 9, 12A, 12B, and 12C.

Q. LET'S BEGIN BY DEFINING SOME OF THE TERMS THAT ARE GOING TO BE USED IN THIS TESTIMONY, SUCH AS MEASUREMENT CATEGORIES, MEASUREMENTS AND SUB-METRICS.

A. A measurement category is a major grouping of the measures themselves. Measurement categories are Operations Support Systems, Ordering, Provisioning, Maintenance & Repair, Billing, E911, Operator Services/Directory Assistance, Database Update Information, Trunk Group Performance, Collocation and Change Management.

Measurements fall within measurement categories and are such things as Percent Missed Installation Appointments (in the Provisioning category) and Firm Order Confirmation Timeliness (in the Ordering category). There are 71 measurements in the BellSouth SQM.

A sub-metric is the term applied to the result of disaggregating the measurement into a multitude of sub-parts where performance data is actually captured. For instance, Percent Missed Installation Appointments is sub-divided into such sub-metrics as Percent Missed Installation Appointments - Resale Residence, dispatch, < 10 circuits or Percent Missed Installation Appointments – 2 wire Analog Loop. When this disaggregation is completed the end result is approximately 1200 sub-metrics in the BellSouth SQM.

Collectively, all of these terms can be referred to as performance measurements.

Q. SHOULD THE FLORIDA PUBLIC SERVICE COMMISSION CONSIDER THE MEASUREMENTS PROPOSED BY MS. KINARD IN HER DIRECT TESTIMONY AS A REASONABLE MECHANISM FOR MONITORING BELLSOUTH'S PERFORMANCE?

A. No. If there is no other single reason for rejecting what the ALECs have proposed, the simple fact that their plan would require a review of almost 75,000 sub-metrics (as opposed to approximately 1200 proposed by BellSouth) every month should be sufficient basis for rejecting the ALECs' plan out of hand. Indeed, under Ms. Kinard's proposal, the Commission would be faced with the daunting proposition of sifting through 74,695 sub-metrics each month to assess BellSouth's performance, just for the aggregate Alternative Local Exchange Carrier (ALEC) industry. Adding the sub-metrics for individual ALECs would make this number truly astounding and even more unworkable, if that were possible. One has to wonder what the Commission would do with this volume of data if it were filed with the Commission each month.

Q. AREN'T PERFORMANCE MEASURES AN APPROPRIATE WAY TO MEASURE PARITY?

A. Certainly. Performance measurements are an appropriate means for the Florida Public Service Commission to determine if BellSouth is serving the ALECs in a manner similar to BellSouth retail. By reviewing objective results for the performance measurements proposed by BellSouth, the Commission can appropriately compare results for ALECs against BellSouth retail results.

Essentially there are two parts of the equation that generate these objective results. First you have to decide what you are going to measure (for instance, order completion intervals, which is a measurement in the general measurement category of Provisioning). Then you have to determine the levels of disaggregation at which these measurements are going to be applied. For instance, you might look at order completion intervals for two wire analog loops and you might also look at order completion intervals for Resale Residence > 10 circuits. BellSouth's SQM filed with my direct testimony provides appropriate measurements and disaggregation levels, and results in about 1200 sub-metrics.

However Ms. Kinard has proposed that the Commission evaluate a myriad of measurements and sub-metrics that go far beyond that necessary to assess BellSouth's performance.

Q. LETS TURN TO THE NUMBER OF MEASUREMENTS FIRST. MS. KINARD SPENDS SEVERAL PAGES OF HER DIRECT TESTIMONY

DISCUSSING THE RELATIONSHIP BETWEEN BELLSOUTH'S INTERIM NOVEMBER 2000 SQM, ADDITIONAL PERFORMANCE MEASURES ORDERED IN GEORGIA, FIVE NEW MEASUREMENTS BEING DEVELOPED IN GEORGIA AND THE TEXAS PLAN MEASUREMENTS REQUIRED BY THE TENNESSEE REGULATORY AUTHORITY IN THE ITC^DELTACOM ARBITRATION. WOULD YOU COMMENT ON THESE MEASURES?

A. Yes. Ms. Kinard obviously didn't have the benefit of the new SQM that BellSouth filed in this proceeding when she prepared her direct testimony. A quick review of the additional measurements she has proposed (as compared to BellSouth's November 2000 SQM) will show that a number of the measurements that Ms. Kinard wants have been included in the current SQM. For instance, with regard to the additional measurements proposed in Georgia,13 of the 16 new measurements (or 80%) mentioned by Ms. Kinard are included in the new BellSouth SQM in Florida. They are:

- Average Response Time for Loop Makeup Information (Manual & Mechanized)
- Acknowledgement Timeliness
- Acknowledgement Completeness.
- Firm Order Confirmation and Reject Response Completeness
- Coordinated Customer Conversion – Average Recovery Time.
- Cooperative Acceptance Testing Attempts vs. Requested by ALECs.

- Recurring Charge Completeness.
- Non-recurring Charge Completeness.
- Mean Time to Notify ALECs of Network Outages.
- Mean Time to Notify ALECs of Interface Outages.
- Average Database Update Interval.
- Average Database Update Accuracy.
- NXX and LRNs loaded and tested by LERG date.

Q. CAN YOU EXPLAIN WHY BELLSOUTH HAS OMITTED THREE OF THE 16 GEORGIA MEASURES THAT MS. KINARD REFERENCES IN HER TESTIMONY?

A. Yes. These measurements, and brief explanations of why BellSouth does not believe these measurements are necessary, are as follow:

1. % Completions/Attempts w/o Notice or < 24 Hours Notice. Basically this measurement has been proposed because sometimes BellSouth works an ALEC order without giving what the ALEC considers to be appropriate notice. Since the issue here is to measure parity, it is difficult to see how this measurement captures any information about the level of service BellSouth provides to the ALEC.

BellSouth currently has five separate provisioning measurements (Provisioning P1 – P5) that deal with order completion intervals, held orders and completion notices. These measures provide information for determining how well BellSouth is doing in this area of provisioning. This

proposed measure is an example of a measurement of a portion of the ordering and provisioning process. It attempts to combine FOC timeliness, % installation appointments met and OCI into one.

2. BFRs processed in 30 business days.

3. BFR Quotes provided in X days. The Georgia Commission ordered BellSouth to add measurements to the SQMs reflecting the percentage of Bona Fide Requests processed within thirty days and the percentage of quotes provided for Bona Fide Requests within certain intervals. However, during the period of January 2000 through October 2000, BellSouth received only seven Bona Fide Requests from ALECs across the entire-region. While BellSouth could report its performance with respect to Bona Fide Requests on a manual basis, it is impossible to draw any conclusions about BellSouth's performance based upon such a limited number of transactions. Therefore BellSouth does not believe it appropriate or reasonable to add these measurements at this time.

Q. MS. KINARD'S MENTIONS FIVE ADDITIONAL MEASURES THAT BELLSOUTH WAS DEVELOPING AT THE TIME OF THE GEORGIA PROCEEDING. CAN YOU DESCRIBE WHAT IS HAPPENING WITH THOSE ADDITONAL MEASUREMENTS?

A. The five additional measurements mentioned by Ms. Kinard have been included in the current SQM filed with my direct testimony. They are:

- Service Inquiry with Firm Order (Manual)

- Loop Makeup Inquiry (Manual and Electronic)
- Timeliness of Change Management Notices
- Percentage Functional Acknowledgements Returned on Time
- Percentage Troubles within 7 Days of Hot Cut

Q. ON PAGES 7-8 OF HER TESTIMONY, MS. KINARD LISTS 26 TEXAS PLAN MEASUREMENTS THAT THE TENNESSEE REGULATORY AUTHORITY REQUIRED BELLSOUTH TO PROVIDE AS A RESULT OF THE DELTACOM ARBITRATION. CAN YOU ADDRESS BELLSOUTH'S POSITION ON THESE MEASUREMENTS?

A. Yes. I have several points I would like to make here. First, several of the measurements ordered by the TRA are already included in BellSouth's SQM. Second, for the balance of the measurements, the ALECs offer no rationale for including the measurements other than the fact that the Tennessee Regulatory Authority has ordered them in an arbitration between BellSouth and DeltaCom. Next, I would note that the Tennessee Regulatory Authority's order concerning these measurements is still the subject of an active Motion for Reconsideration in the DeltaCom arbitration in Tennessee. A final disposition has not yet been determined. Finally, on March 12, 2001, the Tennessee Regulatory Authority established a new generic performance measurements docket, Docket No. 01-00193. Although it indicated that it would adopt, as a base the performance measurements, benchmarks, and enforcement mechanisms, ordered in the DeltaCom arbitration, the bottom line is that

there is still a lot of work to be done in Tennessee before a final set of performance measurements and enforcement mechanisms are established. This Commission should make its own decision on these measurements, rather than relying on another commission whose work is not yet done.

Q. MS. KINARD SEEMS TO ASKING THIS COMMISSION TO SIMPLY INCORPORATE, WITHOUT ANY CRITICAL ANALYSIS, MEASUREMENTS ADOPTED IN OTHER JURISDICTIONS. IS IT APPROPRIATE TO SIMPLY ADOPT MEASUREMENTS BECAUSE THEY WERE ADOPTED IN OTHER STATES?

A. Absolutely not. In fact, the FCC has not required identical measurements in the cases where it has approved interLATA authority for SBC and Verizon. Although many of the products and services are similar across ILECs, the method by which those products and services are delivered and the Operations Support Systems and Legacy Systems that serve as the foundation for delivery of those products and services may differ among ILECs. The primary goal of these performance measures, as I testified previously, is to provide this Commission with sufficient measurements to determine that BellSouth is providing non-discriminatory treatment to the ALECs. BellSouth's Service Quality Measurements satisfy that goal.

Q. TURNING TO SPECIFIC ADDITIONAL MEASURES THAT THE ALECS EVIDENTLY WANT INCLUDED, ON PAGES 10-24 OF HER DIRECT TESTIMONY, MS. KINARD DISCUSSES A NUMBER OF MEASURES THAT THE ALECS EVIDENTLY SUPPORT. CAN YOU ADDRESS THESE ADDITIONAL MEASURES?

A. Yes. Beginning on page 10, Ms. Kinard lists 40 measurements that the ALECs claim should be added to the BellSouth SQM. In response, BellSouth notes that 20 of Ms. Kinard's proposed 40 measurements (50%) are already encompassed in the new BellSouth SQMs. In fact, many of these measurements Ms. Kinard advocates are duplicative of the measures added as a result of the earlier described proceeding in Georgia. There are, however, some measures that BellSouth simply disagrees should be included among the performance measures. In some instances, BellSouth disagrees because the item Ms. Kinard wants to include measures something that existing measures already touch upon. In other cases, the proposed measurement is simply inappropriate or unneeded. I have already discussed one of these, Percent Completions/Attempts without Notice or with Less Than 24 Hours Notice. On the following pages of my testimony I will discuss the remaining measurements that have been proposed by Ms. Kinard, but which should not be included.

Measurements:

1. OP – Mean Time to Provide Response to Request for BellSouth-to-ALEC Trunks
2. OP – Percent Responses to Request for BellSouth-to-ALEC Trunks Provided within 7 Days
3. OP – Percent Negative Responses to Requests for BellSouth-to-ALEC Trunks

BellSouth's response: The primary focus of these measurements is to determine whether there was sufficient trunking capacity from the BellSouth network to the ALEC switch when traffic is increased substantially, such as might occur when an Internet Service Provider is switched to the ALEC. Each of the measurements purports to measure responses to requests made by the ALECs for trunking. Since BellSouth has no way of knowing when this is going to occur, it hardly seems fair to have a measurement related to BellSouth's success in meeting an unanticipated demand. The best solution is not to have another set of measurements, but to require an accurate forecast by the ALEC of traffic requirements – well before the ALEC serves the Internet Service Provider.

In connection with this proposed measurement, later in her testimony Ms. Kinard discusses having trunking relief levels at 50%. To propose that we build a trunk arrangement that would provide every ALEC with 50% spare capacity in the trunk group is not efficient nor is it in the best interest of the Florida customer.

4. OP – Order Accuracy

BellSouth's response: This metric is supposed to capture whether BellSouth has improperly changed an ALEC order as a result of its manual handling of the order. BellSouth's existing measurements, Percent Provisioning Troubles within 30 Days of Service Order Activity and Invoice Accuracy are both reflective of the accuracy of BellSouth's order completions. That is, if BellSouth messes up an order through its manual handling of the order, that fact will be captured and reported in these other measures. The FCC agreed with this position in FCC 98-72, ¶ 68, in stating "We believe, therefore, that this measurement (Percentage of Troubles in 30 Days for New Orders) will provide information about whether the incumbent LEC processed the order accurately. Accordingly, we propose that incumbent LECs measure the Percentage of Troubles in Thirty Days for New Orders as a substitute for LCUG's proposed measurement of Percentage Orders Processed Accurately. We believe that the Percentage of Troubles in Thirty Days for New Orders will provide the information sought by LCUG, but will be a less burdensome measurement than measuring order accuracy". In other words, the ALECs have tried to get the FCC to approve this measure and it has refused, finding that the other measures accurately reflect the concern that the ALECs want measured.

5. OP – Percent of Orders Cancelled or Supplemented at the Request of the ILEC

BellSouth's response: The focus of BST activities is on complying with

meeting the due date on the original order, not asking the ALEC to supplement or cancel the order. Ms. Kinard seems to suggest that BellSouth will ask an ALEC to supplement or cancel an order just so that a due date won't be missed. It is not obvious what would be ascertained from this particular measurement, since BellSouth could, and no doubt would, have a bona fide reason for asking for a supplementary order that would not be captured or revealed by this statistic. Therefore, this measurement is not necessary.

6. OP – Percent of Coordinated Cuts Not Working as Initially Provisioned

BellSouth's response: BellSouth is adding a new "hot cut" measurement, % provisioning troubles within 7 days of a completed service order, as discussed on page 3-20 of Exhibit DAC-1, attached to my direct testimony. An ALEC can report a trouble as soon as the service order is completed. In most instances, services that do not work should be identified and resolved during the cutover process before the order is completed in the system. If it is not, it is captured in the sub-metric that BellSouth has already added, and the sub-metric proposed by the ALECs is simply a duplication of what is already available.

7. OP – Mean Time to Restore a Customer to the ILEC

8. OP – Percent of Customers Restored to the ILEC

BellSouth's response: These measures relate to customers who were going to be switched to the ALECs but who were not because of a

problem in the porting process. The measures would record the time that lapses before the customer is returned to service with BellSouth and the percent of customers that are returned. It is impossible to draw any meaningful conclusions from these two measurements. The porting of the customer may have failed because of something the ALEC did or failed to do. To the extent that these measurements were intended to quantify problems in the "hot cut" process, there are already measures that relate to this topic, including measures such as % Provisioning Troubles, Customer Trouble Report Rate, % Missed Installation Appointments, Coordinated Customer Conversion, Average Order Completion Interval and Maintenance Average Duration.

9. OP – Call Abandonment Rate – Ordering and Provisioning

10. MR – Call Abandonment Rate – Maintenance

BellSouth's response: BellSouth's measurements, Speed of Answering in the Ordering Center and Average Answer Time – Repair Center, measure the average time a customer is in queue when calling the ordering and repair centers. Both the ALEC proposed measurements and the existing BellSouth measurements assess how quickly an incoming call is answered. There is no reason for these additional measurements proposed by the ALECs.

11. OP – Percent Successful xDSL Service Testing

12. OP – (disaggregation or new metric) – Percent Completion of Timely Loop Modification/Conditioning on xDSL Loops

BellSouth's response: BellSouth has added DSL level disaggregation to its existing and new measurements with this proceeding. The two measurements above address issues that are already measured by BellSouth's provisioning measurements, such as order completion interval and percent missed installation appointments.

13. BL – Percent Billing Errors Correct in X Days

14. BL – Percent On-Time Mechanized Local Service Invoice Delivery

BellSouth response: BellSouth currently provides measurements that address these issues. They are B-1, Invoice Accuracy and B-2, Mean Time to Deliver Invoices. In addition to the measurements, BellSouth conducts monthly audits by the Billing Verification Group that evaluates samples of bills to check accuracy, compliance, etc. BellSouth believes that these measures provide adequate information to assess BellSouth's billing processes.

15. MI – Percent Response Commitments Met On Time

BellSouth's response: Evidently this metric will measure the time between when a question is posed to a BellSouth "help desk" and when the answer is received by the ALEC. On pages 19-20 of her testimony, Ms. Kinard alleges "ALECs should not have to wait days for BellSouth to respond to a problem that has totally stalled production of orders for the ALEC". While the ALECs may properly be concerned about the time BellSouth takes to respond to a question, this particular measure would be dependent on a completely manual process of tracking the

responsiveness of BellSouth service representatives. Who would record when the question was asked? How would disputes about what the question was, or when it was asked be resolved? This issue would be better worked through contract negotiations on an individual basis rather than develop a group of measures for all ALECs.

16. CM – Percent ILEC vs. ALEC Changes Made

BellSouth's response: Absolutely no useful information can be achieved through this measurement. It asks what percentage of BellSouth proposed changes are accepted versus ALEC proposed changes. The change control process has a method of escalating any disputes about whether a proposed change was properly rejected. This measurement would tell nothing about the relative merits or demerits of any proposal. Suppose the ALECs submitted a number of change requests that are technically infeasible to accomplish. BellSouth believes that the purpose of change management is to work together as a team and prioritize the requirements for the good of all participants. With that in mind measuring anything other than the process is unnecessary. The BellSouth measurements included with this filing are results focused and are the only ones necessary to provide a parity comparison of the change management process.

17. OSS – Percent Software Certification Failures

18. OSS – Software Problem Resolution Timeliness

19. OSS – Software Problem Resolution Average Delay Days

BellSouth's response: BellSouth believes that the testing arrangements made available with any software update are adequate to resolve these issues before the software is loaded. Further, the change management process is more suitable to establish methods and procedures for software updates. Participating in that process would eliminate the need for these proposed measures.

Q. TURNING FROM THE MEASUREMENTS THEMSELVES TO ANOTHER TOPIC, ON PAGE 31 OF HER DIRECT TESTIMONY, MS. BURSH ALLEGES THAT "THE DATA AND REPORTS SHOULD BE MADE AVAILABLE ON THE 15TH DAY OF EACH MONTH". HOW DO YOU RESPOND?

A. As I testified previously, BellSouth believes posting these reports and the underlying data for by the 30th day of the month for the preceding month's activity is appropriate. Due to the sheer volume and size of these reports, just considering the measurements proposed by BellSouth, posting by the 15th as suggested by Ms. Bursh is simply impossible. Ms. Bursh offers not one shred of evidence that it is critical to have the reports by the 15th of each month, or even that it could be done. As I testified in my direct testimony, the fact that very few ALECs even access

their reports is an indication that most ALECs would rather use their resources to focus on their customers rather than focus on the data.

In its' proposal the FPSC Staff recommended posting by the 20th day. Once again, BellSouth objects to setting as an objective, the 20th day for posting these reports. In the past, the 20th day was occasionally achievable because of a much lower volume of ALEC-specific data and performance measurement reports. Today, there are approximately 155 ALECs operating in Florida. There are 105 ALEC specific reports included in the BellSouth SQMs that are posted on the BellSouth web site and 129 BellSouth/ALEC aggregate level reports. If all 155 ALECs were to request reports each month this would equate to 155 ALECs times 105 reports (16,275 reports) plus the 129 aggregate reports for a total of 16,404 reports posted on a monthly basis in Florida. In addition there is a very significant volume of underlying raw data. BellSouth makes every effort to validate the reports before posting. Given this volume, BellSouth believes posting on the 30th day of the month is reasonable.

With regard to the raw data, the web-site I mentioned does allow ALECs to access electronically the raw data underlying those reports to the extent such reports are derived from BellSouth's Performance Measurement Analysis Platform (PMAP). The format of this raw data is a flat file that can quickly be imported into a spreadsheet or a database management program for further analysis and processing by the ALEC. These reports will include the most critical ordering, provisioning, and

maintenance & repair measurements in which ALECs generally are interested, including, but not limited to, FOC Timeliness, Reject Interval, Percent Missed Installation Appointments, Average Completion Interval Order Completion Interval Distribution, Missed Repair Appointments, Customer Trouble Report Rate, and Maintenance Average Duration.

While every performance report is available electronically, BellSouth does not have the capability to make available electronically the raw data that is used to generate reports outside of PMAP. This would include the raw data for the regional reports that are not specific to a single ALEC, which cannot be efficiently generated electronically. The measurements that reflect the Speed of Answer in the Ordering Center and Speed of Answer in the Maintenance Center are good examples. These measurements reflect the time during which a call is in queue until a BellSouth representative answers the call. These work centers are regional in nature and serve all ALECs, which means that hundreds of thousands of calls are received each month. Although each call is individually timed and the averages for the month are posted in the SQM reports, it is not possible to electronically identify each and every ALEC call underlying these SQM reports.

Q. ON PAGE 32 OF HER TESTIMONY, MS. BURSH ALLEGES THAT 1) "THE ILEC SHOULD MAINTAIN A CURRENT AND ACCURATE USER'S MANUAL TO SUPPORT ALECS IN ACCESSING AND INTERPRETING THE RAW DATA" AND 2) "THE ILEC SHOULD ALSO PROVIDE A

KNOWLEDGEABLE SINGLE POINT OF CONTACT WITH WHOM ALECS CAN CONFER TO RESOLVE QUESTIONS ABOUT ACCESSING THE RAW DATA..." HOW DO YOU RESPOND?

A. BellSouth already complies with both of these positions. BellSouth currently posts a comprehensive User Manual on the same web site as the performance reports and raw data that explains in detail all aspects of the raw data reflected in Ms. Bursh's comments. Furthermore, BellSouth has always had a single point of contact for questions regarding the raw data and User Manual, and in fact, AT&T has utilized both the User Manual and single point of contact extensively during the past couple of years.

Q. ON PAGES 24 AND 25 OF HER TESTIMONY, MS. KINARD ALLEGES THE NEED FOR PERIODIC PERFORMANCE MEASUREMENT REVIEWS BY THIS COMMISSION. HOW DO YOU RESPOND?

A. As I testified previously, BellSouth concurs in the need for periodic reviews and BellSouth supports the proposed review process set forth in Section 3.0, Modifications to Measures, in the FPSC Staff proposal.

Q. ON PAGE 25 OF HER TESTIMONY, MS. KINARD OFFERS AN EXPLANATION OF BUSINESS RULES AND WHY THEY ARE IMPORTANT IN METRIC DEFINITION. HOW DO YOU RESPOND?

A. I generally agree with Ms. Kinard's explanation of the need for, and the importance of business rules. However I take exception to her claim on page 25, lines 23-25, that the "the business rules need to be detailed enough that a third party can use them to recreate BellSouth's performance measurement reports using BellSouth's raw data." If Ms. Kinard is suggesting the user manual needs to be duplicated as part of the business rules in the SQM, since one would require both the business rules and the user manual for an ALEC to reproduce BellSouth's performance measurement reports from the raw data, I would certainly object. I do not believe that the business rules need contain the details in the raw data user manual, only the business logic to apply to the user manual to produce reports from raw data. The fact is the business rules should be targeted at helping the reader to understand the measurement. If the reader is interested in further detail such as recreation of the metric from raw data, these relevant details should be kept in a separate document.

Q. IN HER EXHIBIT KK-1, ATTACHED TO HER TESTIMONY, MS. KINARD ADDRESSES 12 PAGES OF CHANGES TO BUSINESS RULES, EXCLUSIONS, CALCULATIONS AND STANDARDS THAT SHE ALLEGES SHOULD BE EFFECTED IMMEDIATELY. HOW DO YOU RESPOND?

A. In the SQM that I filed with my direct testimony, we presented our current view of the appropriate business rules associated with the measurements

that we proposed. Ms. Kinard's analysis is based on an older SQM and the revisions we have in our new SQM addressed a number of her concerns. For instance, in connection with the measurement identified as OSS-1, Average Response Time and Response Interval, BellSouth now provides this measurement in the manner that she requested. As for her other comments, to the extent that they are still relevant to the current SQM, BellSouth's existing business rules are clear, concise, and appropriate. As I have already testified, the SQM attached to my direct testimony as Exhibit DAC-1 is a new SQM that has been modified to incorporate changes proposed by KPMG, as part of the Georgia and Florida testing, as well as the Georgia and Louisiana Commission orders.

It is interesting that changes advocated by Ms. Kinard are similar to the changes that BellSouth and a coalition of ALECs discussed extensively in the generic performance measurement dockets in Louisiana and Georgia for the past 2 years. Many of the ALECs participating in those dockets are the same ALECs involved in this generic proceeding in Florida. Ms. Kinard is simply re-hashing old issues and offers no substantive reason why BellSouth's business rules should be changed.

Q. TURNING TO A NEW SUBJECT, ON PAGES 27 – 34 OF HER TESTIMONY, MS. KINARD DISCUSSES THE APPROPRIATE LEVELS OF DISAGGREGATION ASSOCIATED WITH THE ALECS' PROPOSED PERFORMANCE MEASUREMENTS. WHAT IS 'DISAGGREGATION'

AND HOW DO YOU RESPOND TO THE DISAGGREGATION PROPOSED BY MS. KINARD?

A. As I stated in my direct testimony, the term disaggregation refers to the breakdown, for reporting purposes, of measurements into specific sub-metrics, such as products, activity types, and volumes. Achieving an appropriate level of disaggregation is important because measurements and reporting frequently occur only at this level. However, it is also important that the disaggregation not be so granular and so detailed so as to completely obfuscate performance. Using an analogy, one would not view an artist's painting by focusing only on the individual brush strokes. Yet the ALECs' proposal does just that by taking the comparison point at which BellSouth's performance is evaluated to extremes.

As I stated previously, the ALEC plan includes approximately 75,000 sub-metrics, compared to approximately 1200 sub-metrics in BellSouth's plan. The level of disaggregation in the two plans principally accounts for this difference.

Q. PLEASE GIVE AN EXAMPLE TO ILLUSTRATE WHAT YOU MEAN.

A. Starting at line 23 of page 27 of her direct testimony, and continuing on for several pages, Ms. Kinard refers to her exhibit KK-2 and, later, KK-3, as containing the levels of disaggregation proposed by the ALECs.

Referring to the second page of Exhibit KK-3, Measure 1, Mean Held Order Interval & Distribution Intervals is the first in a series of measurements of the provisioning process. On this exhibit, Ms. Kinard refers to Exhibit KK-2 as containing the disaggregation for this measurement. Exhibit KK-2 requires that the Mean Held Order measurement category be broken down according to:

- 41 types of products. (per section G)
- 13 levels of geography (per Section D, item 4) Florida has 11 MSAs, one non-MSA for all areas of rural Florida not in an MSA and a final geographic level for the state in total.
- 3 levels of volumes (per Section D, Item 3) for 1-5 lines, 6-14 lines and 15+ lines.
- 3 levels of dispatch status (per Section D, Item 2) representing Dispatch In, Dispatch Out, and what Ms. Kinard calls Non Dispatch.

This means there are 41 times 13 times 3 times 3 = 4,797 sub-metrics for the single measurement of Mean Held Order Interval & Distribution Interval. This is absurd.

Q. IN THE EXAMPLE ABOVE, YOU USE JUST ONE MEASUREMENT CATEGORY, MEAN HELD ORDER INTERVAL & DISTRIBUTION INTERVALS TO DEMONSTRATE THE EFFECT OF DISAGGREGATION. USING A SIMILAR ANALYSIS FOR ALL MEASUREMENT CATEGORIES, HOW MANY SUBMETRICS ARE THE ALECS PROPOSING FOR THE ENTIRE MEASUREMENT PLAN?

A. The ALECs' measurement plan consists of an incredible 74,695 sub-metrics as I mentioned earlier. And that is just for the ALEC aggregate each month. The details are in my exhibit DAC-R1 attached to my rebuttal testimony. In this exhibit, I summarize the disaggregation for each measurement category using a method similar to the example above.

Each of these 74,695 sub-metrics for the ALEC aggregate must then be compared against some standard, either a retail analog or a benchmark. Essentially the Commission is faced with the monthly comparison of nearly 150,000 numbers to evaluate BellSouth's performance to the ALEC industry as a whole. If the Commission is interested in performance for one or more ALECs individually, the comparisons multiply.

Q. FOR COMPARISON, HOW MANY SUB-METRICS ARE IN THE SERVICE QUALITY MEASUREMENT PLAN PROPOSED BY BELLSOUTH?

A. As mentioned above, there are approximately 1,200 sub-metrics in BellSouth's proposal for the ALEC aggregate. Exhibit DAC-2R, attached to my rebuttal testimony lists each sub-metric specified by BellSouth's SQM. As above, these measurements are for the ALEC industry as a whole. Approximately 1,200 sub-metrics each month is more than sufficient for the Commission to evaluate BellSouth's performance.

Q. ON PAGE 27 OF HER TESTIMONY, MS. KINARD DISCUSSES THE NEED FOR DISAGGREGATION IN GENERAL THEN ALLEGES THAT "COVAD'S TESTIMONY (COVAD WITNESS TOM ALLEN) DISCUSSES FURTHER THE NEED FOR XDSL AND LINE SHARING/SPLITTING DISAGGREGATION". HOW DO YOU RESPOND?

A. As I testified in detail in my direct testimony, BellSouth agrees with Ms. Kinard that performance data must be disaggregated into specific categories so as not to mask disparate treatment. BellSouth believes that the disaggregation set forth in its SQMs, attached as Exhibit DAC-1 to my direct testimony, more than adequately provides the appropriate level of disaggregation. However, her allegation regarding Covad's requirement for further disaggregation for xDSL and Line Sharing/Splitting is unfounded. Covad is not proposing anything that BellSouth does not already measure in its SQM. BellSouth currently measures the delivery of loops in measurement P-3; Percent Missed Installation Appointments of its Service Quality Measurements document in Exhibit DAC-1 of my direct testimony. This measurement is the percentage of total orders processed for which BellSouth is unable to complete the service orders on the committed due dates. The DSL loops will be provided in a separate disaggregation of this measurement. Covad's concern, therefore, is already addressed in BellSouth's SQM.

Q. ON PAGES 32-34 OF HER TESTIMONY, MS. KINARD DISCUSSES ANALOGS AND BENCHMARKS ASSOCIATED WITH THE ALEC'S PERFORMANCE PLAN. CAN YOU COMMENT ON HER REMARKS?

A. Initially, I would note that her comments deal with the ALEC plan, not the BellSouth plan. Since BellSouth has asked the Commission to adopt it's plan rather than the ALECs' plan, discussing the ALEC plan's benchmarks and analogs isn't particularly appropriate. However, BellSouth would note that Ms. Kinard simply presents her analogs and benchmarks without any critical analysis to support the conclusions she has reached. Anticipating that the ALECs might try to make the same claim with regard to BellSouth's analogs and benchmarks, BellSouth would note that its recommendations are the result of several years work and have been conformed to the results reached in Georgia. While BellSouth agrees, as it stated earlier, with the principle that simply having another state approve something does not necessarily mean it is appropriate for Florida, the fact that Georgia has approved these analogs and benchmarks should bear some weight.

Q. YOU HAVE SPENT CONSIDERABLE TIME DISCUSSING ALL THE MODIFICATIONS, I.E. NEW MEASURES, CHANGES TO MEASURES, ETC., THAT MS. KINARD PROPOSES ON BEHALF OF THE ALEC COALITION. CAN YOU SUMMARIZE, IN BASIC TERMS, WHAT THE REAL IMPACT WOULD BE IN ORDERING ADDITIONAL MODIFICATIONS TO THE BELLSOUTH SQM?

A. Yes. As I explained in detail in my direct testimony and in Exhibit DAC-2 attached to my direct testimony, changes to BellSouth's SQMs are a monumental task, which BellSouth wants to impress on all of the parties to this proceeding. It is not just a matter of throwing a switch or adding a line of code to a program. BellSouth is committed to making all the changes necessary, including the addition of the new measurements resulting from the Georgia and Louisiana Orders, which are incorporated in the new SQM attached to my direct testimony as Exhibit DAC-1. However, these modifications will take until the end of 2001 to complete in their entirety. If this Commission decides to order any of the additional new measures or changes to existing measurements, i.e. levels of disaggregation, changes to business rules, changes to analogs or benchmarks, proposed by Ms. Kinard, representing the ALEC Coalition in Florida, the time and resources required by BellSouth to incorporate these changes will be significant.

I do not want to suggest that BellSouth is unwilling to do what this Commission believes to be appropriate, but it is clear that the ALECs haven't given any thought to the complexity of what they are requesting or what it would take to accomplish it. This does not represent unwillingness on BellSouth's part to be responsive, it is simply based on the sheer magnitude of the effort. Let us not lose sight of the fact that the purpose of performance measurements is to provide this Commission with sufficient data on which to identify disparate treatment, not measure

microscopically every single detail of BellSouth's operations. BellSouth's proposed SQMs provide 1200 sub-metrics, whereas the ALEC's proposal expands this to 74,695 sub-metrics. These sub-metrics are the foundation upon which this Commission and Commission Staff will have to perform an analysis each and every month to determine disparate treatment. At issue is the question: ' How much data is enough?' As I testified previously, BellSouth's SQMs are the result of years of work and refinement. They represent a comprehensive set of performance measurements that are more than sufficient for this Commission to identify monitor BellSouth's performance in Florida.

Q. TURNING TO THE QUESTIONS OF AUDITS, ON PAGE 36 OF HER TESTIMONY, MS. KINARD ALLEGES THAT COSTS FOR ANNUAL AUDITS SHOULD BE BORNE BY BELLSOUTH. HOW DO YOU RESPOND?

A. In Appendix C of the BellSouth SQMs, attached as Exhibit DAC-1 to my direct testimony, BellSouth specifies that the cost of the annual audits shall be borne 50% by BellSouth and 50% by the ALECs. BellSouth should not be held responsible for the entire cost of these annual audits. BellSouth has already invested significant resources and dollars, under the direction of the Georgia and Florida Commissions, in the validation and testing of BellSouth's performance measures by an independent third-party, KPMG. Ms. Kinard, in her testimony on page 36, cites from the FCC order approving Verizon's 271 application that "an important

characteristic of Verizon's Amended Performance Assurance Plan was reasonable assurance that the reported data is accurate". BellSouth believes that the audits and testing conducted in Georgia and Florida satisfy the "reasonable assurance" characteristic of that FCC order. In fact, in a March 20, 2001 letter to the Georgia Commission regarding the status of the KPMG testing in Georgia, Michael W. Weeks, Managing Director of KCI, propounds "it should be noted that, in our judgment, inaccuracies in (BellSouth's) metrics reporting would not in and of themselves have a materially adverse impact on competition". Therefore, costs associated with additional annual audits should be shared equally between BellSouth and the ALECs as stated in the BellSouth Audit Policy in Appendix C.

Q. ON PAGES 36-39 OF HER TESTIMONY, MS. KINARD DISCUSSES IN DETAIL THE NEED FOR MINI-AUDITS? HOW DO YOU RESPOND?

Ms. Kinard proposes, on page 37 of her testimony, that "each ALEC would be limited to auditing three single measures/sub-measures or one domain area (pre-order, ordering, provisioning, maintenance or billing) during the audit year". She also states proposes that "mini-audits could not be requested by an ALEC while the OSS third party test or an annual audit was being conducted (that is, before completion)". Consider, for a moment, the true implications of Ms. Kinard's proposal. As I testified previously, there are over 80 ALECs in Florida that currently have the BellSouth SQMs as part of their interconnection agreements. If each of

those ALECs were allowed 3 mini-audits a year as proposed by Ms. Kinard, that would equate to 240 audits per year in Florida alone. If the annual comprehensive audit takes 6 months to complete (a conservative estimate based on comprehensive audits in Georgia and Florida), there are only 6 months left for mini-audits. This means 40 mini-audits a month or approximately 2 per day. Once again, I am only talking about audits associated with the ALECs in Florida. If expanded to include the over 800 ALECs in the region, this would equate to 400 mini-audits per month of the 6 month mini-audit period, (20 audits per day). Compound this by her proposal to include a domain area, which could, i.e., include as many as 15 measures in the ordering domain or 12 measures in the provisioning domain or even the nearly 75,000 sub-metrics I discussed earlier. This is entirely unreasonable, especially considering the fact that on page 38 of her testimony, Ms. Kinard proposes that BellSouth would pay 50% of the costs for the mini-audits.

The following section is associated with Issues 9, 11a, 11b, 11.c, 11.c.3, 11.c.4, 12a, 12b, 12c, 12.c.3, 12.c.4, 19a, 19b, 20, 21

Q. HOW WOULD YOU GENERALLY DESCRIBE THE ENFORCEMENT PLAN AS PROPOSED BY MS. BURSH IN HER DIRECT TESTIMONY?

A. The ALECs' proposed enforcement plan is simply an elaborate, complex mechanism designed to transfer money from BellSouth to the ALECs at a

rapid rate, irrespective of the quantity of transactions for which alleged disparate treatment occurred, and with virtually no limit to the amount.

Q: IN MS. BURSH'S DIRECT TESTIMONY, BEGINNING AT LINE 6 OF PAGE 2, SHE ALLEGES THAT SHE WILL "DESCRIBE WHY THE REMEDY PLAN PROPOSED BY THE ALECS IS THE APPROPRIATE PLAN FOR THIS COMMISSION TO ADOPT...". DO YOU AGREE WITH MS. BURSH THAT THE ALEC PLAN IS THE APPROPRIATE PLAN FOR THIS COMMISSION TO ADOPT?

No. BellSouth's proposed penalty plan[1], when compared to the ALEC proposed penalty plan, is the appropriate penalty plan for this Commission to adopt for the following reasons:

BellSouth Proposed Penalty Plan	**ALEC Coalition Proposed Penalty Plan**
• BellSouth's penalty plan includes a fixed cap on BellSouth's liability.	• The ALEC penalty plan has no cap on BellSouth's liability and would require BellSouth to make payments beyond reason.
• The BellSouth plan recognizes that not all metrics are treated equal, and that all are not equally important to ALECs, by offering greater remedies	• The ALEC's plan is Inclusive of all measures carrying equal weight despite the fact that all measures do not have the same impact on customers. As an

[1] BellSouth's penalty plan consists of two parts. In Exhibit DAC-1, attached to my direct testimony, the measurements pages contain a section labeled SEEM that explains how the measurement is addressed in the penalty plan. Also attached to my direct testimony is an Exhibit DAC-6 that explains the calculations and fee schedules.

for certain measurements than others - UNE Installation Intervals and Average Response Interval – OSS, for example.

example, the ALECs apparently believe missing several seconds on the Average Response Interval – OSS is as important as missing the Installation Appointment for a UNE Loop by several days.

- BellSouth's plan is based on a complete statistical methodology jointly developed by statisticians representing BellSouth and statisticians representing the CLEC Coalition in Louisiana.

- The ALEC plan is based on a statistical methodology that is incomplete as discussed in detail in BellSouth witness, Dr. Mulrow's testimony.

- The BellSouth plan is swift and self-executing and requires no additional regulatory involvement.

- The ALEC plan requires additional regulatory involvement on two levels, the requirement for Root Cause Analysis and the imposition of a procedural cap.

- The BellSouth plan ties the penalty payments to the economic severity of a performance disparity.

- The ALEC plan uses an arbitrary function of the test statistic that has no relation to the likely economic value, as discussed in Dr. Taylor's rebuttal testimony.

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Q. ON PAGE 5, LNS. 2-5, OF HER TESTIMONY, AT&T WITNESS BURSH STATES THAT "REMEDIES MUST BE SIGNIFICANT ENOUGH TO ENSURE THAT IT IS MORE BENEFICIAL FOR BELLSOUTH TO COMPLY WITH THE PERFORMANCE STANDARDS THAN TO PAY THE REMEDIES FOR NON-COMPLIANCE". HOW DO YOU RESPOND?

A. I agree with Ms. Bursh to a point. Indeed, this is a point that Dr. Taylor discusses in his rebuttal testimony. If this Commission finds it necessary to adopt a remedy structure in Florida, this remedy structure should be designed to identify deficiencies in BellSouth's performance in meeting the parity requirements of the Act and compel BellSouth to correct those deficiencies. BellSouth's proposed remedy plan, which I described in my direct testimony, fulfils this obligation.

Q. ONE AREA OF DIFFERENCE BETWEEN THE ALEC PLAN AND BELLSOUTH'S PLAN APPEARS TO BE THE NUMBER OF MEASURES THAT ARE SUBJECT TO PENALTIES. MS. BURSH, ON PAGE 10 OF HER TESTIMONY CONTENDS, "BECAUSE THE SUB-MEASURES MONITOR KEY AREAS OF ALEC AND BELLSOUTH ACTIVITY, ALL SUB-MEASURES PROPOSED BY THE ALECS ARE INCLUDED IN THE DETERMINATION OF REMEDY PAYMENTS". CAN YOU COMMENT ON THIS?

A. Yes. This is a one of the most onerous aspects of the ALECs' plan, for several reasons.

The first reason is the number of sub-metrics to which penalties are attached. As I described on earlier in my testimony, the ALECs are proposing 74,695 performance measurements and sub-metrics for the ALECs in aggregate. In other words, there are approximately 75,000 metrics eligible for remedy payments each month and those are only the Tier 2 measures or the industry aggregate measures that I have discussed previously. It is difficult to believe that the ALECs actually expect this Commission or anyone to accept the notion that there are 75,000 "key measures," particularly since these "key measures" only address the ALEC industry in the aggregate. Presumably, based on Ms. Bursh's analysis, she will then argue that there are millions of "key measures" when we talk about individual ALECs.

To illustrate the absurdity of such a claim, let's look at an example. For Tier 1 payments to the 155 ALECs operating in Florida, there would be some multiple of the approximate 74,696 aggregate metrics assessed each month for penalty payments. All ALECs do not operate in all areas of Florida, nor do all ALECs provide all 41 products. However if one considers only the provisioning and maintenance measurement categories and further assumes that the average ALEC operates in 25% of areas of Florida and that the average ALEC provides 25% of the products, there would be nearly 665,000 metrics assessed each month

for penalty payments at the Tier 1 level. That would simply be unmanageable by everybody, whether we are talking about BellSouth, the Commission or the ALECs.

Q. WHAT IS THE PRIMARY IMPACT OF HAVING SUCH AN EXTREME NUMBER OF SUB-METRICS SUBJECT TO PENALTY?

A. In basic terms, the impact will be more penalty payments.

Q. PLEASE EXPLAIN

A. The ALECs have proposed 75,000 sub-metrics and presumably a failure on any one would trigger a penalty. Obviously the more sub-metrics, the more opportunities to have penalties imposed. The ALECs have already turned the situation with one-way traffic to ISPs into a revenue opportunity. With this many sub-metrics, they would soon turn performance measures into a line of business.

Voluntary self-effectuating remedies should only apply to the key, outcome oriented measures. Furthermore, imposition of voluntary, self-effectuating penalties on every measure will impermissibly subject BellSouth to being penalized more than once for a single act or failure to act because many of the measures that the ALECs would suggest are integrally interrelated to one another. In other words, failure to meet some measures will necessarily mean failure to meet other measures.

Having a penalty associated with each measure will, thus, result in multiple penalties for a single failure. As an example, the ALEC plan proposes the following measurements for Provisioning:

- % Jeopardies
- Mean Held Order Interval
- % Orders Completed on Time

An ALEC order that cannot be installed on time due to a facility shortage would affect all three of these measurements. In other words, a single event could create penalty payments for three different measurements. This could be particularly troublesome if an ALEC's marketing plan is focused on a discrete geographic area such as an office park or high-rise where a concentrated marketing effort would likely create facility shortages.

Q. SHOULD REMEDIES APPLY TO PERFORMANCE MESURES THAT ARE SHOWN TO BE DUPLICATIVE OF OR "HIGHLY CORRELATED" WITH OTHER MEASURES?

A. I agree with Ms. Bursh's answer on page 11 of her testimony that the answer to this question is no. However I disagree with Ms. Bursh's allegation on page 11, lines 16-17 that "data and methods are lacking to omit any measure at this time." On page 12, lines 7 and 8, Ms. Bursh states that "An industry-developed correlation analysis should be developed to make valid correlation determinations." Presumably she

would have BellSouth measured and penalized on interdependent measures until the industry could work this out. That just isn't reasonable.

On lines 20 and 21 of page 12 Ms. Bursh repeats this theme by stating "An industry-developed correlation analysis needs to be developed and implemented." BellSouth attempted to do just that in the Louisiana workshops. There was not agreement in that proceeding and I expect any industry effort in this proceeding would not resolve the issue, especially since the ALECs have a financial incentive to have as many sub-metrics as possible in an enforcement plan.

Whereas Ms. Bursh advocates a time-consuming data correlation study, common sense is really all that is necessary. As I described above, if a facility is not available, 3 measurements can be affected. Similarly, if a repair appointment is missed, the measurements of Maintenance Average Duration and Out of Service Greater than 24 hours are affected.

Q. AGAIN TURNING TO ANOTHER SUBJECT, ON PAGE 14 OF HER TESTIMONY, MS. BURSH ALLEGES THAT DISAGGREGATION FOR PERFORMANCE REPORTING AND COMPLIANCE DETERMINATION SHOULD BE THE SAME. DO YOU AGREE?

A. No. Performance reporting serves the purpose of allowing the determination to be made that BellSouth is meeting its commitments

under Sections 251 and 252 of the TeleCom Act. The purpose of the enforcement plan is to ensure that BellSouth does not "backslide" once it obtains interLATA relief. The FCC has clearly recognized that in the latter case only a limited number of key measures need be examined. For instance, the FCC specifically stated:

> We also believe that the scope of performance covered by the Carrier-to-Carrier metrics is sufficiently comprehensive, and that the New York Commission reasonably selected key competition-affecting metrics from this list for inclusion in the enforcement plan. We disagree with commenters who suggest that additional metrics must be added to the plan in order to ensure its effectiveness, and note that the New York Commission has considered and rejected similar arguments. (footnotes omitted) NY, Para 439, FCC 99-404, 12/22/99.

Once again, the ALECs have a significant financial incentive for justifying the inclusion of as many sub-metrics as possible in a voluntary enforcement plan. The FCC clearly does not agree with the ALECs.

Q. ANOTHER CRUCIAL DIFFERENCE BETWEEN THE ALEC PLAN AND BELLSOUTH PLAN APPEARS TO BE THE WAY IN WHICH REMEDY PAYMENTS ARE ASSESSED. PLEASE EXPLAIN THIS DIFFERENCE.

A. With out attempting to replicate here the analyses of Dr. Mulrow and Dr. Taylor, I will say that the fundamental difference is that BellSouth's plan is volume sensitive and assesses penalties that will properly reflect the harm the ALEC has suffered. While BellSouth's plan would result in lower penalties where ALECs have very few transactions, BellSouth's plan actually provides for higher penalties than the ALEC plan once volumes grow.

The ALEC plan, on the other hand, provides for the possibility of disproportionately large penalty payments even when there is a very low volume of transactions.

In addition, BellSouth's plan recognizes that certain measurements have a larger impact on an ALEC's ability to compete. For instance, while taking a few seconds more to return an address validation may present a problem that problem is clearly not as serious as missing a collocation due date. BellSouth's plan takes this into account while the ALEC plan does not.

Q. ANOTHER AREA OF DIFFERENCE BETWEEN THE ALEC PLAN AND BELLSOUTH'S PLAN IS THE USE OF AN ABSOLUTE CAP. ACCORDING TO MS. BURSH, ON PAGE 27, LINE 20, OF HER TESTIMONY, "CLECS DO NOT SUPPORT AN ABSOLUTE CAP ON REMEDY PAYMENTS". DO THE ALECS PROPOSE ANY CAP?

A. No. The ALECs' plan appears to include a provision allowing BellSouth to seek regulatory relief from excessive penalties, but does not propose a cap and therefore implies that penalties should be imposed without limit. This is absurd. A voluntary penalty plan should not be so onerous as to potentially cripple the ILEC economically. This would result in a detrimental effect, not only on BellSouth's performance to the ALECs, but also on BellSouth's retail operations. In the final analysis, the Florida consumer would surely suffer.

Q. DOES BELLSOUTH'S REMEDY PLAN PROPOSE A CAP AND IF SO, WHY?

A. Yes, an absolute cap. Any voluntary, self-executing remedy plan adopted by the Commission should contain an absolute monetary cap. In agreeing to a voluntary enforcement plan, BellSouth or any ILEC has to balance it's responsibilities to it's shareholders and it's customers. In this case, it's customers include both ALECs and others. BellSouth cannot be required to jeopardize it's ability to fulfill it's responsibilities to all of these groups solely for the benefit of one group. That is what an un-capped plan would do. Beyond this, it should be recalled that the purpose of this voluntary enforcement plan is to prevent "backsliding" when BellSouth obtains interLATA relief in Florida. The cap that BellSouth has proposed would have equated to approximately 300 million dollars based on 1999 net revenue. Clearly, this is a more than adequate

deterrent to "backsliding" and balances the interest of each group of stakeholders.

Q. IS THERE ANY PRECEDENT FOR BELLSOUTH'S PROPOSAL TO USE AN ABSOLUTE CAP?

A. Yes. The FCC has now approved enforcement plans for four states and in each instance has imposed an absolute cap such as the one proposed here.

It is important to remember that no matter what the cap, ALECs will retain the right to pursue other legal remedies under federal and state antitrust laws, before state and federal agencies and federal and state courts of law. As the FCC has repeatedly stated, a self-executing enforcement plan is not intended to be "the only means of ensuring that [the RBOC] continues to provide nondiscriminatory service to competing carriers. In addition to the [financial dollars] at stake ... [the RBOC] faces other consequences if it fails to sustain a high level of service to competing carriers, including: federal enforcement action pursuant to section 271(d)(6); ... and remedies associated with antitrust and other legal actions." See Bell Atlantic Order, at ¶435.

Q. ON PAGE 34 OF HER TESTIMONY, MS. BURSH ALLEGES THE NEED FOR VALIDATION OF TIER 1 AND TIER 2 REMEDY PAYMENTS. HOW DO YOU RESPOND?

A. As I testified previously, BellSouth agrees with the proposal set forth by the FPSC Staff in Section 4.6.5 of Exhibit PWS-1 in Mr. Stallcup's direct testimony. Although Ms. Bursh suggests that remedy payments be validated on a random basis, BellSouth's approach is a more structured approach. At the end of each calendar year, BellSouth will have its independent auditing and accounting firm certify that all penalties under Tier 1 and Tier 2 Enforcement Mechanisms were paid and accounted for in accordance with Generally Accepted Accounting Principles.

Q. ON PAGE 35 OF HER TESTIMONY, MS. BURSH ALLEGES THAT "ROOT CAUSE ANALYSIS IS A USEFUL PROCEDURE FOR BUILDING ACTION PLANS FOR UNACCEPTABLE PERFORMANCE AND SHOULD BE INCORPORATED WITHIN A PERFORMANCE MEASUREMENT SYSTEM, BUT IT CANNOT SERVE AS A VEHICLE FOR DELAYING OR OTHERWISE AVOIDING PAYMENT OF IDENTIFIED PERFORMANCE FAILURES". HOW DO YOU RESPOND?

A. Ms. Bursh's allegation is somewhat confusing. A Root Cause Analysis, by its very nature, is both time consuming and resource intensive. As I testified previously, an enforcement plan, when and if it becomes effective, should function automatically (that is, be self-effectuating) and avoid administrative burdens for the ALEC, BellSouth and the Commission. Conducting a root cause analysis is an administrative process that is both burdensome and unnecessary given that enforcement will provide the incentive to automatically correct significant

disparate treatment. This 'self-correction' process is a key by-product of enforcement. BellSouth has the information necessary to identify problems and the incentive, by virtue of enforcement penalties, to correct those problems. There is no need to devote additional commission and BellSouth resources formalizing a process that is not required.

Q. AS PROPOSED BY MS. BURSH ON PAGE 39 OF HER TESTIMONY, SHOULD THIS COMMISSION ADOPT THE ALEC PROPOSED PERFORMANCE INCENTIVE PLAN, VERSION 2.0?

A. No. As I testified previously, BellSouth's proposed plan is the appropriate plan for this Commission to adopt for the following reasons:

- It is a comprehensive plan crafted on sound principles.
- The Multi-Tiered Structure serves to insure BellSouth will continue to provide service parity by escalating penalties for continued violations.
- The plan recognizes that not all metrics are treated equal, and that all are not equally important to ALECs, by offering greater remedies for certain measurements than others - UNE Installation Intervals and Average Response Interval – OSS, for example.
- Remedies escalate with increased disparity and the increased certainty of disparity.
- Statistical methodology adopted by BellSouth is very sensitive to identifying systematic disparate treatment, thereby insuring that BellSouth will provide nondiscriminatory performance.

- Adoption of the balancing critical value methodology makes remedies more available in emerging markets thereby insuring that BellSouth will not ignore new entrants.

The ALECs' proposal, on the other hand, has some glaring problems. For example:

- Inclusion of all measures carrying equal weight despite the fact that all measures do not have the same impact on customers. As an example, the ALECs apparently believe missing several seconds on the Average Response Interval – OSS is as important as missing the Installation Appointment for a UNE Loop by several days.
- Basing a decision about parity on a level of disaggregation that does not compare 'like-to-like'
- Building a remedy plan based solely on the output of a statistical methodology that is flawed as discussed further in Dr. Mulrow's Rebuttal Testimony.
- Tier-1 and Tier-2 remedies have conflicting concepts. Tier-1 remedies are based on a "Per Measure" which ignores market penetration. In contrast, Tier-2 penalties are driven exclusively by market penetration.
- Fixed "consequence" dollars or a flat dollar amount per transaction missed. Once the measurement is missed for a given month, the consequences do not increase if performance worsens. This would render the plan ineffective.

Last, and most importantly, BellSouth's remedy plan was designed specifically to work in conjunction with BellSouth's mechanized SQM platform to mechanically deliver remedies based on identified disparate treatment. To implement a new remedy plan now would nullify the years of effort and costs entailed by BellSouth to deliver a self-effectuating enforcement plan and would therefore delay significantly BellSouth's ability to deliver performance remedies.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes

EXHIBIT DAC-R1

QUANTITY OF SUB-METRICS
(From KK-2, Sections A-E & G)

Measurement Type (From KK-3)	Quantity Of Measures	Product Disagg.	Interface Types	Geography	Volume	Mech. Type (Full, Partial, Manual)	Dispatch Status	ALEC Total	BST Total For Analogs	ALEC + BST Total
Pre-Ordering										
Response Time & Interval	2	11	3	1	3			198	132	
Preordering (Availability)	1	20	1	1	1			20		
M&R (Availability)	1	17	1	1	1			17		
M&R (Response)	1	11	3	1	8			264	176	
Loop Makeup (Man & Elect)	2	1	7	1	1			14		
Ordering										
Flow/Ack – Tim. Com	3	41	3	1	3	1		1107		
% Rej. RI, FOC	3	41	3	1	3	2		2214		
% Rej RI, FOC	3	41	1	1	3	1		369		
FOC/Rej Comp	1	41	3	1	3	2		738		
FOC/Rej Comp	1	41	1	1	3	1		123		
Speed of Answer	1	1	1	1	1	1		1		
% Order Accuracy	1	41	3	1	3	2		738		
% Order Accuracy	1	41	1	1	3	1		123		
Resp. BST to ALEC	1	1	1	1	1	1		3		
% Rej. RI, FOC - LNP	1	1	3	1	1	2		6		
% Rej. RI, FOC - LNP	1	1	1	1	1	1		1		
Call Abandon Rate	1	1	1	1	1	1		1		
Provisioning										
Held Order, Jeopardy, Missed Appt., OCI, Notice Intvl., Tbls. 30 days, Comp. < 24 hours	9	41	1	13	3	1	3	43173	35334	
CCC, Hot Cut Timeliness, On Time, Orders cancelled by BST, Hot Cuts not working, Avg. Recovery Time, Restore Cust. To ILEC, % restored to ILEC, % Coop. Tested, DSL successful tests, % ULM, LNP MIA, LNP Disconnect	13	1	1	13	3	1	3	1521	117	
Maintenance & Repair										
CTTR, MAD, Repeats, Jeop. Intvl., MRA	5	41	1	13	3	1	3	23985	23985	
Avg. Ans. Time, Mean Ans. Time	2	1	1	1	2	1	1	4		
Billing										
All	8	3	1	1	1	1	1	24	17	
Miscellaneous										

EXHIBIT DAC-R1

QUANTITY OF SUB-METRICS
(From KK-2, Sections A-E & G)

Measurement Type (From KK-3)	Quantity Of Measures	Product Disagg.	Interface Types	Geography	Volume	Mech. Type (Full, Partial, Manual)	Dispatch Status	ALEC Total	BST Total For Analogs	ALEC + BST Total
OSDA	1	2	1	2	1	1	1	4		
E911	3	1	1	2	1	1	1	6		
Call Completion (Trunking)	1	1	1	1	1	1	1	1		
Collocation	3	9	1	1	1	1	1	27		
Database	3	1	1	1	1	1	1	3		
% On Time Response / Notification of Network Outages / Interface Outages	3	1	1	1	1	1	1	3	1	
Change Management	5	1	1	1	1	1	1	5	1	
Software	2	1	1	1	1	1	1	2		
								74695	59763	134458

BellSouth Sub-Metrics

Index	Number	Measurement		Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
1	OSS-1	Average Respone Time and Respone Interval	LENS		RSAG-TN	Address		CLEC Aggregate
2	OSS-1	Average Respone Time and Respone Interval	LENS		RSAG-ADDR	Address		CLEC Aggregate
3	OSS-1	Average Respone Time and Respone Interval	LENS		ATLAS-TN	Telno		CLEC Aggregate
4	OSS-1	Average Respone Time and Respone Interval	LENS		DSAP	Schedule		CLEC Aggregate
5	OSS-1	Average Respone Time and Respone Interval	LENS		HAL/CRIS	CustRecord		CLEC Aggregate
6	OSS-1	Average Respone Time and Respone Interval	LENS		COFFI/USOC	Feature/Svc		CLEC Aggregate
7	OSS-1	Average Respone Time and Respone Interval	LENS		PSIMS/ORB	Feature/Svc		CLEC Aggregate
8	OSS-1	Average Respone Time and Respone Interval	TAG		RSAG-TN	Address		CLEC Aggregate
9	OSS-1	Average Respone Time and Respone Interval	TAG		RSAG -ADDR	Address		CLEC Aggregate
10	OSS-1	Average Respone Time and Respone Interval	TAG		ATLAS-TN	Telno		CLEC Aggregate
11	OSS-1	Average Respone Time and Respone Interval	TAG		ATLAS-MLH	Telno		CLEC Aggregate
12	OSS-1	Average Respone Time and Respone Interval	TAG		ATLAS-DID	Telno		CLEC Aggregate
13	OSS-1	Average Respone Time and Respone Interval	TAG		DSAP	Schedule		CLEC Aggregate
14	OSS-1	Average Respone Time and Respone Interval	TAG		CRESINIT	CustRecord		CLEC Aggregate
15	OSS-1	Average Respone Time and Respone Interval	TAG		CRESCSR	CustRecord		CLEC Aggregate
16	OSS-2	Interface Availability Preordering / Ordering	LENS					CLEC Aggregate
17	OSS-2	Interface Availability Preordering / Ordering	LEO MAINFRAME					CLEC Aggregate
18	OSS-2	Interface Availability Preordering / Ordering	LEO UNIX					CLEC Aggregate
19	OSS-2	Interface Availability Preordering / Ordering	LESOG					CLEC Aggregate
20	OSS-2	Interface Availability Preordering / Ordering	EDI					CLEC Aggregate
21	OSS-2	Interface Availability Preordering / Ordering	HAL					CLEC Aggregate
22	OSS-2	Interface Availability Preordering / Ordering	TAG					CLEC Aggregate
23	OSS-2	Interface Availability Preordering / Ordering	PSIMS					CLEC Aggregate
24	OSS-3	Interface Availability Maintenance & Repair	CLEC TAFI					CLEC Aggregate
25	OSS-3	Interface Availability Maintenance & Repair	CLEC ECTA					CLEC Aggregate
26	PO-1	Loop Makeup - Response Time - Manual	Loops					CLEC Aggregate
27	PO-2	Loop Makeup - Response Time - Electronic	Loops					CLEC Aggregate
28	O-1	Acknowledgement Message Timeliness	EDI					CLEC Aggregate
29	O-1	Acknowledgement Message Timeliness	TAG					CLEC Aggregate
30	O-2	Acknowledgement Message Completeness	EDI					CLEC Aggregate
31	O-2	Acknowledgement Message Completeness	TAG					CLEC Aggregate
32	O-3	Percent Flow-Through Service Requests (Summa	Residence					CLEC Aggregate
33	O-3	Percent Flow-Through Service Requests (Summa	Business					CLEC Aggregate
34	O-3	Percent Flow-Through Service Requests (Summa	UNE					CLEC Aggregate
35	O-3	Percent Flow-Through Service Requests (Summa	LNP					CLEC Aggregate
36	O-4	Percent Flow-Through Service Requests (Detail)	Residence					CLEC Aggregate
37	O-4	Percent Flow-Through Service Requests (Detail)	Business					CLEC Aggregate
38	O-4	Percent Flow-Through Service Requests (Detail)	UNE					CLEC Aggregate
39	O-4	Percent Flow-Through Service Requests (Detail)	LNP					CLEC Aggregate
40	O-7	Percent Rejected Service Requests	Fully Mech		Resale-Residence			CLEC Aggregate
41	O-7	Percent Rejected Service Requests	Fully Mech		Resale-Business			CLEC Aggregate
42	O-7	Percent Rejected Service Requests	Fully Mech		Resale-Design (Special)			CLEC Aggregate
43	O-7	Percent Rejected Service Requests	Fully Mech		Resale PBX			CLEC Aggregate
44	O-7	Percent Rejected Service Requests	Fully Mech		Resale Centrex			CLEC Aggregate
45	O-7	Percent Rejected Service Requests	Fully Mech		Resale ISDN			CLEC Aggregate
46	O-7	Percent Rejected Service Requests	Fully Mech		LNP Standalone			CLEC Aggregate
47	O-7	Percent Rejected Service Requests	Fully Mech		2W Analog Loop Design			CLEC Aggregate
48	O-7	Percent Rejected Service Requests	Fully Mech		2W Analog Loop Non-Design			CLEC Aggregate
49	O-7	Percent Rejected Service Requests	Fully Mech		UNE Digital Loop < DS1			CLEC Aggregate
50	O-7	Percent Rejected Service Requests	Fully Mech		UNE Digital Loop > DS1			CLEC Aggregate
51	O-7	Percent Rejected Service Requests	Fully Mech		UNE Loop + Port Combinations			CLEC Aggregate
52	O-7	Percent Rejected Service Requests	Fully Mech		Switch Ports			CLEC Aggregate
53	O-7	Percent Rejected Service Requests	Fully Mech		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
54	O-7	Percent Rejected Service Requests	Fully Mech		Line Sharing			CLEC Aggregate
55	O-7	Percent Rejected Service Requests	Fully Mech		Local Interoffice Transport			CLEC Aggregate
56	O-7	Percent Rejected Service Requests	Fully Mech		Local Interconnection Trunks			CLEC Aggregate
57	O-7	Percent Rejected Service Requests	Partially Mech		Resale-Residence			CLEC Aggregate
58	O-7	Percent Rejected Service Requests	Partially Mech		Resale-Business			CLEC Aggregate
59	O-7	Percent Rejected Service Requests	Partially Mech		Resale-Design (Special)			CLEC Aggregate
60	O-7	Percent Rejected Service Requests	Partially Mech		Resale PBX			CLEC Aggregate
61	O-7	Percent Rejected Service Requests	Partially Mech		Resale Centrex			CLEC Aggregate
62	O-7	Percent Rejected Service Requests	Partially Mech		Resale ISDN			CLEC Aggregate
63	O-7	Percent Rejected Service Requests	Partially Mech		LNP Standalone			CLEC Aggregate
64	O-7	Percent Rejected Service Requests	Partially Mech		2W Analog Loop Design			CLEC Aggregate
65	O-7	Percent Rejected Service Requests	Partially Mech		2W Analog Loop Non-Design			CLEC Aggregate
66	O-7	Percent Rejected Service Requests	Partially Mech		UNE Digital Loop < DS1			CLEC Aggregate
67	O-7	Percent Rejected Service Requests	Partially Mech		UNE Digital Loop > DS1			CLEC Aggregate
68	O-7	Percent Rejected Service Requests	Partially Mech		UNE Loop + Port Combinations			CLEC Aggregate
69	O-7	Percent Rejected Service Requests	Partially Mech		Switch Ports			CLEC Aggregate
70	O-7	Percent Rejected Service Requests	Partially Mech		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
71	O-7	Percent Rejected Service Requests	Partially Mech		Line Sharing			CLEC Aggregate
72	O-7	Percent Rejected Service Requests	Partially Mech		Local Interoffice Transport			CLEC Aggregate
73	O-7	Percent Rejected Service Requests	Partially Mech		Local Interconnection Trunks			CLEC Aggregate
74	O-7	Percent Rejected Service Requests	Non-Mechanized		Resale-Residence			CLEC Aggregate
75	O-7	Percent Rejected Service Requests	Non-Mechanized		Resale-Business			CLEC Aggregate
76	O-7	Percent Rejected Service Requests	Non-Mechanized		Resale-Design (Special)			CLEC Aggregate
77	O-7	Percent Rejected Service Requests	Non-Mechanized		Resale PBX			CLEC Aggregate
78	O-7	Percent Rejected Service Requests	Non-Mechanized		Resale Centrex			CLEC Aggregate
79	O-7	Percent Rejected Service Requests	Non-Mechanized		Resale ISDN			CLEC Aggregate
80	O-7	Percent Rejected Service Requests	Non-Mechanized		LNP Standalone			CLEC Aggregate
81	O-7	Percent Rejected Service Requests	Non-Mechanized		2W Analog Loop Design			CLEC Aggregate
82	O-7	Percent Rejected Service Requests	Non-Mechanized		2W Analog Loop Non-Design			CLEC Aggregate
83	O-7	Percent Rejected Service Requests	Non-Mechanized		UNE Digital Loop < DS1			CLEC Aggregate
84	O-7	Percent Rejected Service Requests	Non-Mechanized		UNE Digital Loop > DS1			CLEC Aggregate
85	O-7	Percent Rejected Service Requests	Non-Mechanized		UNE Loop + Port Combinations			CLEC Aggregate
86	O-7	Percent Rejected Service Requests	Non-Mechanized		Switch Ports			CLEC Aggregate
87	O-7	Percent Rejected Service Requests	Non-Mechanized		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
88	O-7	Percent Rejected Service Requests	Non-Mechanized		Line Sharing			CLEC Aggregate
89	O-7	Percent Rejected Service Requests	Non-Mechanized		Local Interoffice Transport			CLEC Aggregate
90	O-7	Percent Rejected Service Requests	Non-Mechanized		Local Interconnection Trunks			CLEC Aggregate
91	O-7	Percent Rejected Service Requests	Total Mechanized		Resale-Residence			CLEC Aggregate
92	O-7	Percent Rejected Service Requests	Total Mechanized		Resale-Business			CLEC Aggregate
93	O-7	Percent Rejected Service Requests	Total Mechanized		Resale-Design (Special)			CLEC Aggregate
94	O-7	Percent Rejected Service Requests	Total Mechanized		Resale PBX			CLEC Aggregate

BellSouth Sub-Metrics

Index	Number	Measurement		Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
95	O-7	Percent Rejected Service Requests	Total Mechanized		Resale Centrex			CLEC Aggregate
96	O-7	Percent Rejected Service Requests	Total Mechanized		Resale ISDN			CLEC Aggregate
97	O-7	Percent Rejected Service Requests	Total Mechanized		LNP Standalone			CLEC Aggregate
98	O-7	Percent Rejected Service Requests	Total Mechanized		2W Analog Loop Design			CLEC Aggregate
99	O-7	Percent Rejected Service Requests	Total Mechanized		2W Analog Loop Non-Design			CLEC Aggregate
100	O-7	Percent Rejected Service Requests	Total Mechanized		UNE Digital Loop < DS1			CLEC Aggregate
101	O-7	Percent Rejected Service Requests	Total Mechanized		UNE Digital Loop > DS1			CLEC Aggregate
102	O-7	Percent Rejected Service Requests	Total Mechanized		UNE Loop + Port Combinations			CLEC Aggregate
103	O-7	Percent Rejected Service Requests	Total Mechanized		Switch Ports			CLEC Aggregate
104	O-7	Percent Rejected Service Requests	Total Mechanized		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
105	O-7	Percent Rejected Service Requests	Total Mechanized		Line Sharing			CLEC Aggregate
106	O-7	Percent Rejected Service Requests	Total Mechanized		Local Interoffice Transport			CLEC Aggregate
107	O-7	Percent Rejected Service Requests	Total Mechanized		Local Interconnection Trunks			CLEC Aggregate
108	O-8	Reject Interval	Fully Mech		Resale-Residence			CLEC Aggregate
109	O-8	Reject Interval	Fully Mech		Resale-Business			CLEC Aggregate
110	O-8	Reject Interval	Fully Mech		Resale-Design (Special)			CLEC Aggregate
111	O-8	Reject Interval	Fully Mech		Resale PBX			CLEC Aggregate
112	O-8	Reject Interval	Fully Mech		Resale Centrex			CLEC Aggregate
113	O-8	Reject Interval	Fully Mech		Resale ISDN			CLEC Aggregate
114	O-8	Reject Interval	Fully Mech		LNP Standalone			CLEC Aggregate
115	O-8	Reject Interval	Fully Mech		2W Analog Loop Design			CLEC Aggregate
116	O-8	Reject Interval	Fully Mech		2W Analog Loop Non-Design			CLEC Aggregate
117	O-8	Reject Interval	Fully Mech		UNE Digital Loop < DS1			CLEC Aggregate
118	O-8	Reject Interval	Fully Mech		UNE Digital Loop > DS1			CLEC Aggregate
119	O-8	Reject Interval	Fully Mech		UNE Loop + Port Combinations			CLEC Aggregate
120	O-8	Reject Interval	Fully Mech		Switch Ports			CLEC Aggregate
121	O-8	Reject Interval	Fully Mech		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
122	O-8	Reject Interval	Fully Mech		Line Sharing			CLEC Aggregate
123	O-8	Reject Interval	Fully Mech		Local Interoffice Transport			CLEC Aggregate
124	O-8	Reject Interval	Fully Mech		Local Interconnection Trunks			CLEC Aggregate
125	O-8	Reject Interval	Partially Mech		Resale-Residence			CLEC Aggregate
126	O-8	Reject Interval	Partially Mech		Resale-Business			CLEC Aggregate
127	O-8	Reject Interval	Partially Mech		Resale-Design (Special)			CLEC Aggregate
128	O-8	Reject Interval	Partially Mech		Resale PBX			CLEC Aggregate
129	O-8	Reject Interval	Partially Mech		Resale Centrex			CLEC Aggregate
130	O-8	Reject Interval	Partially Mech		Resale ISDN			CLEC Aggregate
131	O-8	Reject Interval	Partially Mech		LNP Standalone			CLEC Aggregate
132	O-8	Reject Interval	Partially Mech		2W Analog Loop Design			CLEC Aggregate
133	O-8	Reject Interval	Partially Mech		2W Analog Loop Non-Design			CLEC Aggregate
134	O-8	Reject Interval	Partially Mech		UNE Digital Loop < DS1			CLEC Aggregate
135	O-8	Reject Interval	Partially Mech		UNE Digital Loop > DS1			CLEC Aggregate
136	O-8	Reject Interval	Partially Mech		UNE Loop + Port Combinations			CLEC Aggregate
137	O-8	Reject Interval	Partially Mech		Switch Ports			CLEC Aggregate
138	O-8	Reject Interval	Partially Mech		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
139	O-8	Reject Interval	Partially Mech		Line Sharing			CLEC Aggregate
140	O-8	Reject Interval	Partially Mech		Local Interoffice Transport			CLEC Aggregate
141	O-8	Reject Interval	Partially Mech		Local Interconnection Trunks			CLEC Aggregate
142	O-8	Reject Interval	Total Mechanized		Resale - Residence			CLEC Aggregate
143	O-8	Reject Interval	Total Mechanized		Resale Business			CLEC Aggregate
144	O-8	Reject Interval	Total Mechanized		Resale-Design (Special)			CLEC Aggregate
145	O-8	Reject Interval	Total Mechanized		Resale PBX			CLEC Aggregate
146	O-8	Reject Interval	Total Mechanized		Resale Centrex			CLEC Aggregate
147	O-8	Reject Interval	Total Mechanized		Resale ISDN			CLEC Aggregate
148	O-8	Reject Interval	Total Mechanized		LNP Standalone			CLEC Aggregate
149	O-8	Reject Interval	Total Mechanized		2W Analog Loop Design			CLEC Aggregate
150	O-8	Reject Interval	Total Mechanized		2W Analog Loop Non-Design			CLEC Aggregate
151	O-8	Reject Interval	Total Mechanized		UNE Digital Loop < DS1			CLEC Aggregate
152	O-8	Reject Interval	Total Mechanized		UNE Digital Loop > DS1			CLEC Aggregate
153	O-8	Reject Interval	Total Mechanized		UNE Loop + Port Combinations			CLEC Aggregate
154	O-8	Reject Interval	Total Mechanized		Switch Ports			CLEC Aggregate
155	O-8	Reject Interval	Total Mechanized		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
156	O-8	Reject Interval	Total Mechanized		Line Sharing			CLEC Aggregate
157	O-8	Reject Interval	Total Mechanized		Local Interoffice Transport			CLEC Aggregate
158	O-8	Reject Interval	Total Mechanized		Local Interconnection Trunks			CLEC Aggregate
159	O-8	Reject Interval	Non-Mechanized		Resale-Residence			CLEC Aggregate
160	O-8	Reject Interval	Non-Mechanized		Resale-Business			CLEC Aggregate
161	O-8	Reject Interval	Non-Mechanized		Resale-Design (Special)			CLEC Aggregate
162	O-8	Reject Interval	Non-Mechanized		Resale PBX			CLEC Aggregate
163	O-8	Reject Interval	Non-Mechanized		Resale Centrex			CLEC Aggregate
164	O-8	Reject Interval	Non-Mechanized		Resale ISDN			CLEC Aggregate
165	O-8	Reject Interval	Non-Mechanized		LNP Standalone			CLEC Aggregate
166	O-8	Reject Interval	Non-Mechanized		2W Analog Loop Design			CLEC Aggregate
167	O-8	Reject Interval	Non-Mechanized		2W Analog Loop Non-Design			CLEC Aggregate
168	O-8	Reject Interval	Non-Mechanized		UNE Digital Loop < DS1			CLEC Aggregate
169	O-8	Reject Interval	Non-Mechanized		UNE Digital Loop > DS1			CLEC Aggregate
170	O-8	Reject Interval	Non-Mechanized		UNE Loop + Port Combinations			CLEC Aggregate
171	O-8	Reject Interval	Non-Mechanized		Switch Ports			CLEC Aggregate
172	O-8	Reject Interval	Non-Mechanized		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
173	O-8	Reject Interval	Non-Mechanized		Line Sharing			CLEC Aggregate
174	O-8	Reject Interval	Non-Mechanized		Local Interoffice Transport			CLEC Aggregate
175	O-8	Reject Interval	Non-Mechanized		Local Interconnection Trunks			CLEC Aggregate
176	O-9	Firm Order Confirmation Timeliness	Fully Mech		Resale – Residence			CLEC Aggregate
177	O-9	Firm Order Confirmation Timeliness	Fully Mech		Resale – Business			CLEC Aggregate
178	O-9	Firm Order Confirmation Timeliness	Fully Mech		Resale – Design (Special)			CLEC Aggregate
179	O-9	Firm Order Confirmation Timeliness	Fully Mech		Resale PBX			CLEC Aggregate
180	O-9	Firm Order Confirmation Timeliness	Fully Mech		Resale Centrex			CLEC Aggregate
181	O-9	Firm Order Confirmation Timeliness	Fully Mech		Resale ISDN			CLEC Aggregate
182	O-9	Firm Order Confirmation Timeliness	Fully Mech		LNP Standalone			CLEC Aggregate
183	O-9	Firm Order Confirmation Timeliness	Fully Mech		2W Analog Loop Design			CLEC Aggregate
184	O-9	Firm Order Confirmation Timeliness	Fully Mech		2W Analog Loop Non-Design			CLEC Aggregate
185	O-9	Firm Order Confirmation Timeliness	Fully Mech		UNE Digital Loop < DS1			CLEC Aggregate
186	O-9	Firm Order Confirmation Timeliness	Fully Mech		UNE Digital Loop > DS1			CLEC Aggregate
187	O-9	Firm Order Confirmation Timeliness	Fully Mech		UNE Loop + Port Combinations			CLEC Aggregate
188	O-9	Firm Order Confirmation Timeliness	Fully Mech		Switch Ports			CLEC Aggregate

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Index	Number	Measurement		Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
189	O-9	Firm Order Confirmation Timeliness	Fully Mech		UNE xDSL (ADSL, HDSL, UCL			CLEC Aggregate
190	O-9	Firm Order Confirmation Timeliness	Fully Mech		Line Sharing			CLEC Aggregate
191	O-9	Firm Order Confirmation Timeliness	Fully Mech		Local Interoffice Transport			CLEC Aggregate
192	O-9	Firm Order Confirmation Timeliness	Fully Mech		Local Interconnection Trunks			CLEC Aggregate
193	O-9	Firm Order Confirmation Timeliness	Partially Mech		Resale – Residence			CLEC Aggregate
194	O-9	Firm Order Confirmation Timeliness	Partially Mech		Resale – Business			CLEC Aggregate
195	O-9	Firm Order Confirmation Timeliness	Partially Mech		Resale – Design (Special)			CLEC Aggregate
196	O-9	Firm Order Confirmation Timeliness	Partially Mech		Resale PBX			CLEC Aggregate
197	O-9	Firm Order Confirmation Timeliness	Partially Mech		Resale Centrex			CLEC Aggregate
198	O-9	Firm Order Confirmation Timeliness	Partially Mech		Resale ISDN			CLEC Aggregate
199	O-9	Firm Order Confirmation Timeliness	Partially Mech		LNP Standalone			CLEC Aggregate
200	O-9	Firm Order Confirmation Timeliness	Partially Mech		2W Analog Loop Design			CLEC Aggregate
201	O-9	Firm Order Confirmation Timeliness	Partially Mech		2W Analog Loop Non-Design			CLEC Aggregate
202	O-9	Firm Order Confirmation Timeliness	Partially Mech		UNE Digital Loop < DS1			CLEC Aggregate
203	O-9	Firm Order Confirmation Timeliness	Partially Mech		UNE Digital Loop > DS1			CLEC Aggregate
204	O-9	Firm Order Confirmation Timeliness	Partially Mech		UNE Loop + Port Combinations			CLEC Aggregate
205	O-9	Firm Order Confirmation Timeliness	Partially Mech		Switch Ports			CLEC Aggregate
206	O-9	Firm Order Confirmation Timeliness	Partially Mech		UNE xDSL (ADSL, HDSL, UCL			CLEC Aggregate
207	O-9	Firm Order Confirmation Timeliness	Partially Mech		Line Sharing			CLEC Aggregate
208	O-9	Firm Order Confirmation Timeliness	Partially Mech		Local Interoffice Transport			CLEC Aggregate
209	O-9	Firm Order Confirmation Timeliness	Partially Mech		Local Interconnection Trunks			CLEC Aggregate
210	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Resale – Residence			CLEC Aggregate
211	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Resale - Business			CLEC Aggregate
212	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Resale – Design (Special)			CLEC Aggregate
213	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Resale PBX			CLEC Aggregate
214	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Resale Centrex			CLEC Aggregate
215	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Resale ISDN			CLEC Aggregate
216	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		LNP Standalone			CLEC Aggregate
217	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		2W Analog Loop Design			CLEC Aggregate
218	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		2W Analog Loop Non-Design			CLEC Aggregate
219	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		UNE Digital Loop < DS1			CLEC Aggregate
220	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		UNE Digital Loop > DS1			CLEC Aggregate
221	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		UNE Loop + Port Combinations			CLEC Aggregate
222	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Switch Ports			CLEC Aggregate
223	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		UNE xDSL (ADSL, HDSL, UCL			CLEC Aggregate
224	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Line Sharing			CLEC Aggregate
225	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Local Interoffice Transport			CLEC Aggregate
226	O-9	Firm Order Confirmation Timeliness	Non-Mechanized		Local Interconnection Trunks			CLEC Aggregate
227	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Resale-Residence			CLEC Aggregate
228	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Resale-Business			CLEC Aggregate
229	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Resale - Design (Special)			CLEC Aggregate
230	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Resale PBX			CLEC Aggregate
231	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Resale Centrex			CLEC Aggregate
232	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Resale ISDN			CLEC Aggregate
233	O-9	Firm Order Confirmation Timeliness	Total Mechanized		LNP Standalone			CLEC Aggregate
234	O-9	Firm Order Confirmation Timeliness	Total Mechanized		2W Analog Loop Design			CLEC Aggregate
235	O-9	Firm Order Confirmation Timeliness	Total Mechanized		2W Analog Loop Non-Design			CLEC Aggregate
236	O-9	Firm Order Confirmation Timeliness	Total Mechanized		UNE Digital Loop < DS1			CLEC Aggregate
237	O-9	Firm Order Confirmation Timeliness	Total Mechanized		UNE Digital Loop > DS1			CLEC Aggregate
238	O-9	Firm Order Confirmation Timeliness	Total Mechanized		UNE Loop + Port Combinations			CLEC Aggregate
239	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Switch Ports			CLEC Aggregate
240	O-9	Firm Order Confirmation Timeliness	Total Mechanized		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
241	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Line Sharing			CLEC Aggregate
242	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Local Interoffice Transport			CLEC Aggregate
243	O-9	Firm Order Confirmation Timeliness	Total Mechanized		Local Interconnection Trunks			CLEC Aggregate
244	O-10	Serv Inq w/LSR FOC Response Time Manual			xDSL (incl UNE unbundled ADS			CLEC Aggregate
245	O-10	Serv Inq w/LSR FOC Response Time			Unbundled Interoffice Transport			CLEC Aggregate
246	O-11	FOC and Reject Response Completeness	Mechanized		Resale-Residence			CLEC Aggregate
247	O-11	FOC and Reject Response Completeness	Mechanized		Resale-Business			CLEC Aggregate
248	O-11	FOC and Reject Response Completeness	Mechanized		Resale - Design (Special)			CLEC Aggregate
249	O-11	FOC and Reject Response Completeness	Mechanized		Resale PBX			CLEC Aggregate
250	O-11	FOC and Reject Response Completeness	Mechanized		Resale Centrex			CLEC Aggregate
251	O-11	FOC and Reject Response Completeness	Mechanized		Resale ISDN			CLEC Aggregate
252	O-11	FOC and Reject Response Completeness	Mechanized		LNP Standalone			CLEC Aggregate
253	O-11	FOC and Reject Response Completeness	Mechanized		2W Analog Loop Design			CLEC Aggregate
254	O-11	FOC and Reject Response Completeness	Mechanized		2W Analog Loop Non-Design			CLEC Aggregate
255	O-11	FOC and Reject Response Completeness	Mechanized		UNE Digital Loop < DS1			CLEC Aggregate
256	O-11	FOC and Reject Response Completeness	Mechanized		UNE Digital Loop > DS1			CLEC Aggregate
257	O-11	FOC and Reject Response Completeness	Mechanized		UNE Loop + Port Combinations			CLEC Aggregate
258	O-11	FOC and Reject Response Completeness	Mechanized		Switch Ports			CLEC Aggregate
259	O-11	FOC and Reject Response Completeness	Mechanized		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
260	O-11	FOC and Reject Response Completeness	Mechanized		Line Sharing			CLEC Aggregate
261	O-11	FOC and Reject Response Completeness	Mechanized		Local Interoffice Transport			CLEC Aggregate
262	O-11	FOC and Reject Response Completeness	Mechanized		Local Interconnection Trunks			CLEC Aggregate
263	O-11	FOC and Reject Response Completeness	Partially Mech		Resale Residence			CLEC Aggregate
264	O-11	FOC and Reject Response Completeness	Partially Mech		Resale Business			CLEC Aggregate
265	O-11	FOC and Reject Response Completeness	Partially Mech		Resale - Design (Special)			CLEC Aggregate
266	O-11	FOC and Reject Response Completeness	Partially Mech		Resale PBX			CLEC Aggregate
267	O-11	FOC and Reject Response Completeness	Partially Mech		Resale Centrex			CLEC Aggregate
268	O-11	FOC and Reject Response Completeness	Partially Mech		Resale ISDN			CLEC Aggregate
269	O-11	FOC and Reject Response Completeness	Partially Mech		LNP Standalone			CLEC Aggregate
270	O-11	FOC and Reject Response Completeness	Partially Mech		2W Analog Loop Design			CLEC Aggregate
271	O-11	FOC and Reject Response Completeness	Partially Mech		2W Analog Loop Non-Design			CLEC Aggregate
272	O-11	FOC and Reject Response Completeness	Partially Mech		UNE Digital Loop < DS1			CLEC Aggregate
273	O-11	FOC and Reject Response Completeness	Partially Mech		UNE Digital Loop > DS1			CLEC Aggregate
274	O-11	FOC and Reject Response Completeness	Partially Mech		UNE Loop + Port Combinations			CLEC Aggregate
275	O-11	FOC and Reject Response Completeness	Partially Mech		Switch Ports			CLEC Aggregate
276	O-11	FOC and Reject Response Completeness	Partially Mech		UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
277	O-11	FOC and Reject Response Completeness	Partially Mech		Line Sharing			CLEC Aggregate
278	O-11	FOC and Reject Response Completeness	Partially Mech		Local Interoffice Transport			CLEC Aggregate
279	O-11	FOC and Reject Response Completeness	Partially Mech		Local Interconnection Trunks			CLEC Aggregate
280	O-11	FOC and Reject Response Completeness	Total Mechanized		Resale-Residence			CLEC Aggregate
281	O-11	FOC and Reject Response Completeness	Total Mechanized		Resale-Business			CLEC Aggregate
282	O-11	FOC and Reject Response Completeness	Total Mechanized		Resale-Design (Special)			CLEC Aggregate

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Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
283	O-11	FOC and Reject Response Completeness	Total Mechanized	Resale PBX			CLEC Aggregate
284	O-11	FOC and Reject Response Completeness	Total Mechanized	Resale Centrex			CLEC Aggregate
285	O-11	FOC and Reject Response Completeness	Total Mechanized	Resale ISDN			CLEC Aggregate
286	O-11	FOC and Reject Response Completeness	Total Mechanized	LNP Standalone			CLEC Aggregate
287	O-11	FOC and Reject Response Completeness	Total Mechanized	2W Analog Loop Design			CLEC Aggregate
288	O-11	FOC and Reject Response Completeness	Total Mechanized	2W Analog Loop Non-Design			CLEC Aggregate
289	O-11	FOC and Reject Response Completeness	Total Mechanized	UNE Digital Loop < DS1			CLEC Aggregate
290	O-11	FOC and Reject Response Completeness	Total Mechanized	UNE Digital Loop > DS1			CLEC Aggregate
291	O-11	FOC and Reject Response Completeness	Total Mechanized	UNE Loop + Port Combinations			CLEC Aggregate
292	O-11	FOC and Reject Response Completeness	Total Mechanized	Switch Ports			CLEC Aggregate
293	O-11	FOC and Reject Response Completeness	Total Mechanized	UNE x DSL (ADSL, HDSL, UCL			CLEC Aggregate
294	O-11	FOC and Reject Response Completeness	Total Mechanized	Line Sharing			CLEC Aggregate
295	O-11	FOC and Reject Response Completeness	Total Mechanized	Local Interoffice Transport			CLEC Aggregate
296	O-11	FOC and Reject Response Completeness	Total Mechanized	Local Interconnection Trunks			CLEC Aggregate
297	O-12	Speed of Answer in Ordering Center	LCSC				CLEC Aggregate
298	O-13	LNP-Percent Rejected Service Requests	Fully Mech	LNP Standalone			CLEC Aggregate
299	O-13	LNP-Percent Rejected Service Requests	Fully Mech	UNE Loop w/LNP			CLEC Aggregate
300	O-13	LNP-Percent Rejected Service Requests	Partially Mech	LNP Standalone			CLEC Aggregate
301	O-13	LNP-Percent Rejected Service Requests	Partially Mech	UNE Loop w/LNP			CLEC Aggregate
302	O-13	LNP-Percent Rejected Service Requests	Total Mechanized	LNP Standalone			CLEC Aggregate
303	O-13	LNP-Percent Rejected Service Requests	Total Mechanized	UNE Loop w/LNP			CLEC Aggregate
304	O-13	LNP-Percent Rejected Service Requests	Non-Mechanized	LNP Standalone			CLEC Aggregate
305	O-13	LNP-Percent Rejected Service Requests	Non-Mechanized	UNE Loop w/LNP			CLEC Aggregate
306	O-14	LNP-Reject Interval Distribution & Average Reje	Fully Mech	LNP Standalone			CLEC Aggregate
307	O-14	LNP-Reject Interval Distribution & Average Reje	Fully Mech	UNE Loop w/LNP			CLEC Aggregate
308	O-14	LNP-Reject Interval Distribution & Average Reje	Partially Mech	LNP Standalone			CLEC Aggregate
309	O-14	LNP-Reject Interval Distribution & Average Reje	Partially Mech	UNE Loop w/LNP			CLEC Aggregate
310	O-14	LNP-Reject Interval Distribution & Average Reje	Total Mechanized	LNP Standalone			CLEC Aggregate
311	O-14	LNP-Reject Interval Distribution & Average Reje	Total Mechanized	UNE Loop w/LNP			CLEC Aggregate
312	O-14	LNP-Reject Interval Distribution & Average Reje	Non-Mechanized	LNP Standalone			CLEC Aggregate
313	O-14	LNP-Reject Interval Distribution & Average Reje	Non-Mechanized	UNE Loop w/LNP			CLEC Aggregate
314	O-15	LNP-FOC Interval Distribution & FOC Average	Mechanized	LNP Standalone			CLEC Aggregate
315	O-15	LNP-FOC Interval Distribution & FOC Average	Mechanized	UNE Loop w/LNP			CLEC Aggregate
316	O-15	LNP-FOC Interval Distribution & FOC Average	Partially Mech	LNP Standalone			CLEC Aggregate
317	O-15	LNP-FOC Interval Distribution & FOC Average	Partially Mech	UNE Loop w/LNP			CLEC Aggregate
318	O-15	LNP-FOC Interval Distribution & FOC Average	Total Mechanized	LNP Standalone			CLEC Aggregate
319	O-15	LNP-FOC Interval Distribution & FOC Average	Total Mechanized	UNE Loop w/LNP			CLEC Aggregate
320	P-1	Mean Held Order Interval & Distribution Interva	Resale-Residence		<10		CLEC Aggregate
321	P-1	Mean Held Order Interval & Distribution Interva	Resale-Business		<10		CLEC Aggregate
322	P-1	Mean Held Order Interval & Distribution Interva	Resale Design		<10		CLEC Aggregate
323	P-1	Mean Held Order Interval & Distribution Interva	Resale PBX		<10		CLEC Aggregate
324	P-1	Mean Held Order Interval & Distribution Interva	Resale Centrex		<10		CLEC Aggregate
325	P-1	Mean Held Order Interval & Distribution Interva	Resale ISDN		<10		CLEC Aggregate
326	P-1	Mean Held Order Interval & Distribution Interva	LNP Standalone		<10		CLEC Aggregate
327	P-1	Mean Held Order Interval & Distribution Interva	2W Analog Loop Design		<10		CLEC Aggregate
328	P-1	Mean Held Order Interval & Distribution Interva	2W Analog Loop Non-Design		<10		CLEC Aggregate
329	P-1	Mean Held Order Interval & Distribution Interva	UNE Digital Loop < DS1		<10		CLEC Aggregate
330	P-1	Mean Held Order Interval & Distribution Interva	UNE Digital Loop > DS1		<10		CLEC Aggregate
331	P-1	Mean Held Order Interval & Distribution Interva	UNE Loop + Port Combinations		<10		CLEC Aggregate
332	P-1	Mean Held Order Interval & Distribution Interva	UNE Switch Ports		<10		CLEC Aggregate
333	P-1	Mean Held Order Interval & Distribution Interva	UNE Combo Other		<10		CLEC Aggregate
334	P-1	Mean Held Order Interval & Distribution Interva	UNE x DSL (ADSL, HDSL, UCL)		<10		CLEC Aggregate
335	P-1	Mean Held Order Interval & Distribution Interva	UNE ISDN (includes UDC)		<10		CLEC Aggregate
336	P-1	Mean Held Order Interval & Distribution Interva	UNE Line Sharing		<10		CLEC Aggregate
337	P-1	Mean Held Order Interval & Distribution Interva	Local Transport (Unbundled)		<10		CLEC Aggregate
338	P-1	Mean Held Order Interval & Distribution Interva	Local Interconnection Trunks				CLEC Aggregate
339	P-1	Mean Held Order Interval & Distribution Interva	Resale-Residence		>10		CLEC Aggregate
340	P-1	Mean Held Order Interval & Distribution Interva	Resale-Business		>10		CLEC Aggregate
341	P-1	Mean Held Order Interval & Distribution Interva	Resale Design		>10		CLEC Aggregate
342	P-1	Mean Held Order Interval & Distribution Interva	Resale PBX		>10		CLEC Aggregate
343	P-1	Mean Held Order Interval & Distribution Interva	Resale Centrex		>10		CLEC Aggregate
344	P-1	Mean Held Order Interval & Distribution Interva	Resale ISDN		>10		CLEC Aggregate
345	P-1	Mean Held Order Interval & Distribution Interva	LNP Standalone		>10		CLEC Aggregate
346	P-1	Mean Held Order Interval & Distribution Interva	2W Analog Loop Design		>10		CLEC Aggregate
347	P-1	Mean Held Order Interval & Distribution Interva	2W Analog Loop Non-Design		>10		CLEC Aggregate
348	P-1	Mean Held Order Interval & Distribution Interva	UNE Digital Loop < DS1		>10		CLEC Aggregate
349	P-1	Mean Held Order Interval & Distribution Interva	UNE Digital Loop > DS1		>10		CLEC Aggregate
350	P-1	Mean Held Order Interval & Distribution Interva	UNE Loop + Port Combinations		>10		CLEC Aggregate
351	P-1	Mean Held Order Interval & Distribution Interva	UNE Switch Ports		>10		CLEC Aggregate
352	P-1	Mean Held Order Interval & Distribution Interva	UNE Combo Other		>10		CLEC Aggregate
353	P-1	Mean Held Order Interval & Distribution Interva	UNE x DSL (ADSL, HDSL, UCL)		>10		CLEC Aggregate
354	P-1	Mean Held Order Interval & Distribution Interva	UNE ISDN (includes UDC)		>10		CLEC Aggregate
355	P-1	Mean Held Order Interval & Distribution Interva	UNE Line Sharing		>10		CLEC Aggregate
356	P-1	Mean Held Order Interval & Distribution Interva	Local Transport (Unbundled)		>10		CLEC Aggregate
357	P-1	Mean Held Order Interval & Distribution Interva	Local Interconnection Trunks				CLEC Aggregate
358	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale - Residence	Mechanized			CLEC Aggregate
359	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale - Business	Mechanized			CLEC Aggregate
360	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale Design	Mechanized			CLEC Aggregate
361	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale PBX	Mechanized			CLEC Aggregate
362	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale Centrex	Mechanized			CLEC Aggregate
363	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale ISDN	Mechanized			CLEC Aggregate
364	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	LNP Standalone	Mechanized			CLEC Aggregate
365	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	2W Analog Loop Design	Mechanized			CLEC Aggregate
366	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	2W Analog Loop Non-Design	Mechanized			CLEC Aggregate
367	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Digital Loop < DS1	Mechanized			CLEC Aggregate
368	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Digital Loop > DS1	Mechanized			CLEC Aggregate
369	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Loop + Port Combinations	Mechanized			CLEC Aggregate
370	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Switch Ports	Mechanized			CLEC Aggregate
371	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Combo Other	Mechanized			CLEC Aggregate
372	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE x DSL (ADSL, HDSL, UCL)	Mechanized			CLEC Aggregate
373	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE ISDN (includes UDC)	Mechanized			CLEC Aggregate
374	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Line Sharing	Mechanized			CLEC Aggregate
375	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Local Transport (Unbundled)	Mechanized			CLEC Aggregate
376	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Local Interconnection Trunks	Mechanized			CLEC Aggregate

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Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
377	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale - Residence	Non Mechanized			CLEC Aggregate
378	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale - Business	Non Mechanized			CLEC Aggregate
379	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale Design	Non Mechanized			CLEC Aggregate
380	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale PBX	Non Mechanized			CLEC Aggregate
381	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale Centrex	Non Mechanized			CLEC Aggregate
382	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Resale ISDN	Non Mechanized			CLEC Aggregate
383	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	LNP Standalone	Non Mechanized			CLEC Aggregate
384	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	2W Analog Loop Design	Non Mechanized			CLEC Aggregate
385	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	2W Analog Loop Non-Design	Non Mechanized			CLEC Aggregate
386	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Digital Loop < DS1	Non Mechanized			CLEC Aggregate
387	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Digital Loop > DS1	Non Mechanized			CLEC Aggregate
388	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Loop + Port Combinations	Non Mechanized			CLEC Aggregate
389	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Switch Ports	Non Mechanized			CLEC Aggregate
390	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Combo Other	Non Mechanized			CLEC Aggregate
391	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE x DSL (ADSL, HDSL, UCL)	Non Mechanized			CLEC Aggregate
392	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE ISDN (includes UDC)	Non Mechanized			CLEC Aggregate
393	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	UNE Line Sharing	Non Mechanized			CLEC Aggregate
394	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Local Transport (Unbundled)	Non Mechanized			CLEC Aggregate
395	P-2	Avg Jeopardy Notice Interval & % of Orders Giv	Local Interconnection Trunks	Non Mechanized			CLEC Aggregate
396	P-3	Percent Missed Installation Appointments	Resale Residence	Dispatch	<10		CLEC Aggregate
397	P-3	Percent Missed Installation Appointments	Resale Business	Dispatch	<10		CLEC Aggregate
398	P-3	Percent Missed Installation Appointments	Resale Design	Dispatch	<10		CLEC Aggregate
399	P-3	Percent Missed Installation Appointments	Resale PBX	Dispatch	<10		CLEC Aggregate
400	P-3	Percent Missed Installation Appointments	Resale Centrex	Dispatch	<10		CLEC Aggregate
401	P-3	Percent Missed Installation Appointments	Resale ISDN	Dispatch	<10		CLEC Aggregate
402	P-3	Percent Missed Installation Appointments	LNP (Standalone)	Dispatch	<10		CLEC Aggregate
403	P-3	Percent Missed Installation Appointments	2W Analog Loop Design	Dispatch	<10		CLEC Aggregate
404	P-3	Percent Missed Installation Appointments	2W Analog Loop Non-Design	Dispatch	<10		CLEC Aggregate
405	P-3	Percent Missed Installation Appointments	UNE Digital Loop < DS1	Dispatch	<10		CLEC Aggregate
406	P-3	Percent Missed Installation Appointments	UNE Digital Loop > DS1	Dispatch	<10		CLEC Aggregate
407	P-3	Percent Missed Installation Appointments	UNE Loop + Port Combinations	Dispatch	<10		CLEC Aggregate
408	P-3	Percent Missed Installation Appointments	UNE Switch ports	Dispatch	<10		CLEC Aggregate
409	P-3	Percent Missed Installation Appointments	UNE Combo Other	Dispatch	<10		CLEC Aggregate
410	P-3	Percent Missed Installation Appointments	UNE xDSL (HDSL, ADSL and UCL)	Dispatch	<10		CLEC Aggregate
411	P-3	Percent Missed Installation Appointments	UNE ISDN (Includes UDC)	Dispatch	<10		CLEC Aggregate
412	P-3	Percent Missed Installation Appointments	UNE Line Sharing	Dispatch	<10		CLEC Aggregate
413	P-3	Percent Missed Installation Appointments	Local Transport (Unbundled Interoffice Transport)	Dispatch	<10		CLEC Aggregate
414	P-3	Percent Missed Installation Appointments	Local Interconnection Trunks	Dispatch			CLEC Aggregate
415	P-3	Percent Missed Installation Appointments	Resale Residence	Non Dispatch	<10		CLEC Aggregate
416	P-3	Percent Missed Installation Appointments	Resale Business	Non Dispatch	<10		CLEC Aggregate
417	P-3	Percent Missed Installation Appointments	Resale Design	Non Dispatch	<10		CLEC Aggregate
418	P-3	Percent Missed Installation Appointments	Resale PBX	Non Dispatch	<10		CLEC Aggregate
419	P-3	Percent Missed Installation Appointments	Resale Centrex	Non Dispatch	<10		CLEC Aggregate
420	P-3	Percent Missed Installation Appointments	Resale ISDN	Non Dispatch	<10		CLEC Aggregate
421	P-3	Percent Missed Installation Appointments	LNP (Standalone)	Non Dispatch	<10		CLEC Aggregate
422	P-3	Percent Missed Installation Appointments	2W Analog Loop Design	Non Dispatch	<10		CLEC Aggregate
423	P-3	Percent Missed Installation Appointments	2W Analog Loop Non-Design	Non Dispatch	<10		CLEC Aggregate
424	P-3	Percent Missed Installation Appointments	UNE Digital Loop < DS1	Non Dispatch	<10		CLEC Aggregate
425	P-3	Percent Missed Installation Appointments	UNE Digital Loop > DS1	Non Dispatch	<10		CLEC Aggregate
426	P-3	Percent Missed Installation Appointments	UNE Loop + Port Combinations	Non Dispatch	<10		CLEC Aggregate
427	P-3	Percent Missed Installation Appointments	UNE Switch ports	Non Dispatch	<10		CLEC Aggregate
428	P-3	Percent Missed Installation Appointments	UNE Combo Other	Non Dispatch	<10		CLEC Aggregate
429	P-3	Percent Missed Installation Appointments	UNE xDSL (HDSL, ADSL and UCL)	Non Dispatch	<10		CLEC Aggregate
430	P-3	Percent Missed Installation Appointments	UNE ISDN (Includes UDC)	Non Dispatch	<10		CLEC Aggregate
431	P-3	Percent Missed Installation Appointments	UNE Line Sharing	Non Dispatch	<10		CLEC Aggregate
432	P-3	Percent Missed Installation Appointments	Local Transport (Unbundled Interoffice Transport)	Non Dispatch	<10		CLEC Aggregate
433	P-3	Percent Missed Installation Appointments	Local Interconnection Trunks	Non Dispatch			CLEC Aggregate
434	P-3	Percent Missed Installation Appointments	Resale Residence	Dispatch	>10		CLEC Aggregate
435	P-3	Percent Missed Installation Appointments	Resale Business	Dispatch	>10		CLEC Aggregate
436	P-3	Percent Missed Installation Appointments	Resale Design	Dispatch	>10		CLEC Aggregate
437	P-3	Percent Missed Installation Appointments	Resale PBX	Dispatch	>10		CLEC Aggregate
438	P-3	Percent Missed Installation Appointments	Resale Centrex	Dispatch	>10		CLEC Aggregate
439	P-3	Percent Missed Installation Appointments	Resale ISDN	Dispatch	>10		CLEC Aggregate
440	P-3	Percent Missed Installation Appointments	LNP (Standalone)	Dispatch	>10		CLEC Aggregate
441	P-3	Percent Missed Installation Appointments	2W Analog Loop Design	Dispatch	>10		CLEC Aggregate
442	P-3	Percent Missed Installation Appointments	2W Analog Loop Non-Design	Dispatch	>10		CLEC Aggregate
443	P-3	Percent Missed Installation Appointments	UNE Digital Loop < DS1	Dispatch	>10		CLEC Aggregate
444	P-3	Percent Missed Installation Appointments	UNE Digital Loop > DS1	Dispatch	>10		CLEC Aggregate
445	P-3	Percent Missed Installation Appointments	UNE Loop + Port Combinations	Dispatch	>10		CLEC Aggregate
446	P-3	Percent Missed Installation Appointments	UNE Switch ports	Dispatch	>10		CLEC Aggregate
447	P-3	Percent Missed Installation Appointments	UNE Combo Other	Dispatch	>10		CLEC Aggregate
448	P-3	Percent Missed Installation Appointments	UNE xDSL (HDSL, ADSL and UCL)	Dispatch	>10		CLEC Aggregate
449	P-3	Percent Missed Installation Appointments	UNE ISDN (Includes UDC)	Dispatch	>10		CLEC Aggregate
450	P-3	Percent Missed Installation Appointments	UNE Line Sharing	Dispatch	>10		CLEC Aggregate
451	P-3	Percent Missed Installation Appointments	Local Transport (Unbundled Interoffice Transport)	Dispatch			CLEC Aggregate
452	P-3	Percent Missed Installation Appointments	Resale Residence	Non Dispatch	>10		CLEC Aggregate
453	P-3	Percent Missed Installation Appointments	Resale Business	Non Dispatch	>10		CLEC Aggregate
454	P-3	Percent Missed Installation Appointments	Resale Design	Non Dispatch	>10		CLEC Aggregate
455	P-3	Percent Missed Installation Appointments	Resale PBX	Non Dispatch	>10		CLEC Aggregate
456	P-3	Percent Missed Installation Appointments	Resale Centrex	Non Dispatch	>10		CLEC Aggregate
457	P-3	Percent Missed Installation Appointments	Resale ISDN	Non Dispatch	>10		CLEC Aggregate
458	P-3	Percent Missed Installation Appointments	LNP (Standalone)	Non Dispatch	>10		CLEC Aggregate
459	P-3	Percent Missed Installation Appointments	2W Analog Loop Design	Non Dispatch	>10		CLEC Aggregate
460	P-3	Percent Missed Installation Appointments	2W Analog Loop Non-Design	Non Dispatch	>10		CLEC Aggregate
461	P-3	Percent Missed Installation Appointments	UNE Digital Loop < DS1	Non Dispatch	>10		CLEC Aggregate
462	P-3	Percent Missed Installation Appointments	UNE Digital Loop > DS1	Non Dispatch	>10		CLEC Aggregate
463	P-3	Percent Missed Installation Appointments	UNE Loop + Port Combinations	Non Dispatch	>10		CLEC Aggregate
464	P-3	Percent Missed Installation Appointments	UNE Switch ports	Non Dispatch	>10		CLEC Aggregate
465	P-3	Percent Missed Installation Appointments	UNE Combo Other	Non Dispatch	>10		CLEC Aggregate
466	P-3	Percent Missed Installation Appointments	UNE xDSL (HDSL, ADSL and UCL)	Non Dispatch	>10		CLEC Aggregate
467	P-3	Percent Missed Installation Appointments	UNE ISDN (Includes UDC)	Non Dispatch	>10		CLEC Aggregate
468	P-3	Percent Missed Installation Appointments	UNE Line Sharing	Non Dispatch	>10		CLEC Aggregate
469	P-3	Percent Missed Installation Appointments	Local Transport (Unbundled Interoffice Transport)	Non Dispatch	>10		CLEC Aggregate
470	P-3	Percent Missed Installation Appointments	Local Interconnection Trunks	Non Dispatch			CLEC Aggregate

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Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
471	P-4	OCI	Resale - Residence	Dispatch	<10		CLEC Aggregate
472	P-4	OCI	Resale - Business	Dispatch	<10		CLEC Aggregate
473	P-4	OCI	Resale Design	Dispatch	<10		CLEC Aggregate
474	P-4	OCI	Resale PBX	Dispatch	<10		CLEC Aggregate
475	P-4	OCI	Resale Centrex	Dispatch	<10		CLEC Aggregate
476	P-4	OCI	Resale ISDN	Dispatch	<10		CLEC Aggregate
477	P-4	OCI	LNP (Standalone)	Dispatch	<10		CLEC Aggregate
478	P-4	OCI	2WAnalog Loop Design	Dispatch	<10		CLEC Aggregate
479	P-4	OCI	2W Analog Loop Non-Design	Dispatch	<10		CLEC Aggregate
480	P-4	OCI	UNE Digital Loop < DS1	Dispatch	<10		CLEC Aggregate
481	P-4	OCI	UNE Digital Loop > DS1	Dispatch	<10		CLEC Aggregate
482	P-4	OCI	UNE Loop + Port Combinations	Dispatch	<10		CLEC Aggregate
483	P-4	OCI	UNE Switch ports	Dispatch	<10		CLEC Aggregate
484	P-4	OCI	UNE Combo Other	Dispatch	<10		CLEC Aggregate
485	P-4	OCI	UNE xDSL (HDSL, ADSL and UCL)	Dispatch	<10		CLEC Aggregate
486	P-4	OCI	UNE ISDN (Includes UDC)	Dispatch	<10		CLEC Aggregate
487	P-4	OCI	UNE Line Sharing	Dispatch	<10		CLEC Aggregate
488	P-4	OCI	Local Transport (Unbundled Interoffice Transport)	Dispatch	<10		CLEC Aggregate
489	P-4	OCI	Local Interconnection Trunks				CLEC Aggregate
490	P-4	OCI	Resale - Residence	Non Dispatch	<10		CLEC Aggregate
491	P-4	OCI	Resale - Business	Non Dispatch	<10		CLEC Aggregate
492	P-4	OCI	Resale Design	Non Dispatch	<10		CLEC Aggregate
493	P-4	OCI	Resale PBX	Non Dispatch	<10		CLEC Aggregate
494	P-4	OCI	Resale Centrex	Non Dispatch	<10		CLEC Aggregate
495	P-4	OCI	Resale ISDN	Non Dispatch	<10		CLEC Aggregate
496	P-4	OCI	LNP (Standalone)	Non Dispatch	<10		CLEC Aggregate
497	P-4	OCI	2W Analog Loop Design	Non Dispatch	<10		CLEC Aggregate
498	P-4	OCI	2W Analog Loop Non-Design	Non Dispatch	<10		CLEC Aggregate
499	P-4	OCI	UNE Digital Loop < DS1	Non Dispatch	<10		CLEC Aggregate
500	P-4	OCI	UNE Digital Loop > DS1	Non Dispatch	<10		CLEC Aggregate
501	P-4	OCI	UNE Loop + Port Combinations	Non Dispatch	<10		CLEC Aggregate
502	P-4	OCI	UNE Switch ports	Non Dispatch	<10		CLEC Aggregate
503	P-4	OCI	UNE Combo Other	Non Dispatch	<10		CLEC Aggregate
504	P-4	OCI	UNE xDSL (HDSL, ADSL and UCL)	Non Dispatch	<10		CLEC Aggregate
505	P-4	OCI	UNE ISDN (Includes UDC)	Non Dispatch	<10		CLEC Aggregate
506	P-4	OCI	UNE Line Sharing	Non Dispatch	<10		CLEC Aggregate
507	P-4	OCI	Local Transport (Unbundled Interoffice Transport)	Non Dispatch	<10		CLEC Aggregate
508	P-4	OCI	Local Interconnection Trunks				CLEC Aggregate
509	P-4	OCI	Resale - Residence	Dispatch	>10		CLEC Aggregate
510	P-4	OCI	Resale - Business	Dispatch	>10		CLEC Aggregate
511	P-4	OCI	Resale Design	Dispatch	>10		CLEC Aggregate
512	P-4	OCI	Resale PBX	Dispatch	>10		CLEC Aggregate
513	P-4	OCI	Resale Centrex	Dispatch	>10		CLEC Aggregate
514	P-4	OCI	Resale ISDN	Dispatch	>10		CLEC Aggregate
515	P-4	OCI	LNP (Standalone)	Dispatch	>10		CLEC Aggregate
516	P-4	OCI	2W Analog Loop Design	Dispatch	>10		CLEC Aggregate
517	P-4	OCI	2W Analog Loop Non Design	Dispatch	>10		CLEC Aggregate
518	P-4	OCI	UNE Digital Loop < DS1	Dispatch	>10		CLEC Aggregate
519	P-4	OCI	UNE Digital Loop > DS1	Dispatch	>10		CLEC Aggregate
520	P-4	OCI	UNE Loop + Port Combinations	Dispatch	>10		CLEC Aggregate
521	P-4	OCI	UNE Switch Ports	Dispatch	>10		CLEC Aggregate
522	P-4	OCI	UNE Combo Other	Dispatch	>10		CLEC Aggregate
523	P-4	OCI	UNE xDSL (HDSL, ADSL and UCL)	Dispatch	>10		CLEC Aggregate
524	P-4	OCI	UNE ISDN (Includes UDC)	Dispatch	>10		CLEC Aggregate
525	P-4	OCI	UNE Line Sharing	Dispatch	>10		CLEC Aggregate
526	P-4	OCI	Local Transport (Unbundled Interoffice Transport	Dispatch	>10		CLEC Aggregate
527	P-4	OCI	Local Interconnectio Trunks				CLEC Aggregate
528	P-4	OCI	Resale - Residence	Non Dispatch	>10		CLEC Aggregate
529	P-4	OCI	Resale - Business	Non Dispatch	>10		CLEC Aggregate
530	P-4	OCI	Resale Design	Non Dispatch	>10		CLEC Aggregate
531	P-4	OCI	Resale PBX	Non Dispatch	>10		CLEC Aggregate
532	P-4	OCI	Resale Centrex	Non Dispatch	>10		CLEC Aggregate
533	P-4	OCI	Resale ISDN	Non Dispatch	>10		CLEC Aggregate
534	P-4	OCI	LNP (Standalone)	Non Dispatch	>10		CLEC Aggregate
535	P-4	OCI	2W Analog Loop Design	Non Dispatch	>10		CLEC Aggregate
536	P-4	OCI	2W Analog Loop Non Design	Non Dispatch	>10		CLEC Aggregate
537	P-4	OCI	UNE Digital Loop < DS1	Non Dispatch	>10		CLEC Aggregate
538	P-4	OCI	UNE Digital Loop > DS1	Non Dispatch	>10		CLEC Aggregate
539	P-4	OCI	UNE Loop + Port Combinations	Non Dispatch	>10		CLEC Aggregate
540	P-4	OCI	UNE Switch Ports	Non Dispatch	>10		CLEC Aggregate
541	P-4	OCI	UNE Combo Other	Non Dispatch	>10		CLEC Aggregate
542	P-4	OCI	UNE xDSL (HDSL, ADSL and UCL)	Non Dispatch	>10		CLEC Aggregate
543	P-4	OCI	UNE ISDN (Includes UDC)	Non Dispatch	>10		CLEC Aggregate
544	P-4	OCI	UNE Line Sharing	Non Dispatch	>10		CLEC Aggregate
545	P-4	OCI	Local Transport (Unbundled Interoffice Transport)	Non Dispatch	>10		CLEC Aggregate
546	P-4	OCI	Local Interconnection Trunks				CLEC Aggregate
547	P-5	Average Completion Notice Interval	Resale Residence		<10	Mechanized	CLEC Aggregate
548	P-5	Average Completion Notice Interval	Resale Business		<10	Mechanized	CLEC Aggregate
549	P-5	Average Completion Notice Interval	Resale Design		<10	Mechanized	CLEC Aggregate
550	P-5	Average Completion Notice Interval	Resale PBX		<10	Mechanized	CLEC Aggregate
551	P-5	Average Completion Notice Interval	Resale Centrex		<10	Mechanized	CLEC Aggregate
552	P-5	Average Completion Notice Interval	Resale ISDN		<10	Mechanized	CLEC Aggregate
553	P-5	Average Completion Notice Interval	LNP (Standalone)		<10	Mechanized	CLEC Aggregate
554	P-5	Average Completion Notice Interval	2W Analog Loop Design		<10	Mechanized	CLEC Aggregate
555	P-5	Average Completion Notice Interval	2W Analog Loop Non-Design		<10	Mechanized	CLEC Aggregate
556	P-5	Average Completion Notice Interval	UNE Digital Loop < DS1		<10	Mechanized	CLEC Aggregate
557	P-5	Average Completion Notice Interval	UNE Digital Loop > DS1		<10	Mechanized	CLEC Aggregate
558	P-5	Average Completion Notice Interval	UNE Loop + Port Combinations		<10	Mechanized	CLEC Aggregate
559	P-5	Average Completion Notice Interval	UNE Switch ports		<10	Mechanized	CLEC Aggregate
560	P-5	Average Completion Notice Interval	UNE Combo Other		<10	Mechanized	CLEC Aggregate
561	P-5	Average Completion Notice Interval	UNE x DSL (ADSL, HDSL, UCL)		<10	Mechanized	CLEC Aggregate
562	P-5	Average Completion Notice Interval	UNE ISDN (Includes UDC)		<10	Mechanized	CLEC Aggregate
563	P-5	Average Completion Notice Interval	UNE Line Sharing		<10	Mechanized	CLEC Aggregate
564	P-5	Average Completion Notice Interval	Local Transport (Unbuneld Interoffice Transport)		<10	Mechanized	CLEC Aggregate

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Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
565	P-5	Average Completion Notice Interval	Local Interconnection Trunks				CLEC Aggregate
566	P-5	Average Completion Notice Interval	Resale Residence		<10	Non Mechanized	CLEC Aggregate
567	P-5	Average Completion Notice Interval	Resale Business		<10	Non Mechanized	CLEC Aggregate
568	P-5	Average Completion Notice Interval	Resale Design		<10	Non Mechanized	CLEC Aggregate
569	P-5	Average Completion Notice Interval	Resale PBX		<10	Non Mechanized	CLEC Aggregate
570	P-5	Average Completion Notice Interval	Resale Centrex		<10	Non Mechanized	CLEC Aggregate
571	P-5	Average Completion Notice Interval	Resale ISDN		<10	Non Mechanized	CLEC Aggregate
572	P-5	Average Completion Notice Interval	LNP (Standalone)		<10	Non Mechanized	CLEC Aggregate
573	P-5	Average Completion Notice Interval	2W Analog Loop Design		<10	Non Mechanized	CLEC Aggregate
574	P-5	Average Completion Notice Interval	2W Analog Loop Non-Design		<10	Non Mechanized	CLEC Aggregate
575	P-5	Average Completion Notice Interval	UNE Digital Loop < DS1		<10	Non Mechanized	CLEC Aggregate
576	P-5	Average Completion Notice Interval	UNE Digital Loop > DS1		<10	Non Mechanized	CLEC Aggregate
577	P-5	Average Completion Notice Interval	UNE Loop + Port Combinations		<10	Non Mechanized	CLEC Aggregate
578	P-5	Average Completion Notice Interval	UNE Switch ports		<10	Non Mechanized	CLEC Aggregate
579	P-5	Average Completion Notice Interval	UNE Combo Other		<10	Non Mechanized	CLEC Aggregate
580	P-5	Average Completion Notice Interval	UNE x DSL (ADSL, HDSL, UCL)		<10	Non Mechanized	CLEC Aggregate
581	P-5	Average Completion Notice Interval	UNE ISDN (Includes UDC)		<10	Non Mechanized	CLEC Aggregate
582	P-5	Average Completion Notice Interval	UNE Line Sharing		<10	Non Mechanized	CLEC Aggregate
583	P-5	Average Completion Notice Interval	Local Transport (Unbuneld Interoffice Transport)		<10	Non Mechanized	CLEC Aggregate
584	P-5	Average Completion Notice Interval	Local Interconnection Trunks			Non Mechanized	CLEC Aggregate
585	P-5	Average Completion Notice Interval	Resale Residence		>10	Mechanized	CLEC Aggregate
586	P-5	Average Completion Notice Interval	Resale Business		>10	Mechanized	CLEC Aggregate
587	P-5	Average Completion Notice Interval	Resale Design		>10	Mechanized	CLEC Aggregate
588	P-5	Average Completion Notice Interval	Resale PBX		>10	Mechanized	CLEC Aggregate
589	P-5	Average Completion Notice Interval	Resale Centrex		>10	Mechanized	CLEC Aggregate
590	P-5	Average Completion Notice Interval	Resale ISDN		>10	Mechanized	CLEC Aggregate
591	P-5	Average Completion Notice Interval	LNP (standalone)		>10	Mechanized	CLEC Aggregate
592	P-5	Average Completion Notice Interval	2W Analog Loop Design		>10	Mechanized	CLEC Aggregate
593	P-5	Average Completion Notice Interval	2W Analog Loop Non Design		>10	Mechanized	CLEC Aggregate
594	P-5	Average Completion Notice Interval	UNE Digital Loop <DS1		>10	Mechanized	CLEC Aggregate
595	P-5	Average Completion Notice Interval	UNE Digital Loop >DS1		>10	Mechanized	CLEC Aggregate
596	P-5	Average Completion Notice Interval	UNE Loop + Port Combinations		>10	Mechanized	CLEC Aggregate
597	P-5	Average Completion Notice Interval	UNE Switch Ports		>10	Mechanized	CLEC Aggregate
598	P-5	Average Completion Notice Interval	UNE Combo Other		>10	Mechanized	CLEC Aggregate
599	P-5	Average Completion Notice Interval	UNE x DSL (HDSL, ADSL and UCL)		>10	Mechanized	CLEC Aggregate
600	P-5	Average Completion Notice Interval	UNE ISDN (Includes UDC)		>10	Mechanized	CLEC Aggregate
601	P-5	Average Completion Notice Interval	UNE Line Sharing		>10	Mechanized	CLEC Aggregate
602	P-5	Average Completion Notice Interval	Local Transport (Unbundled Interoffice Transport)		>10	Mechanized	CLEC Aggregate
603	P-5	Average Completion Notice Interval	Local Interconnection Trunks			Mechanized	CLEC Aggregate
604	P-5	Average Completion Notice Interval	Resale Residence		>10	Non Mechanized	CLEC Aggregate
605	P-5	Average Completion Notice Interval	Resale Business		>10	Non Mechanized	CLEC Aggregate
606	P-5	Average Completion Notice Interval	Resale Design		>10	Non Mechanized	CLEC Aggregate
607	P-5	Average Completion Notice Interval	Resale PBX		>10	Non Mechanized	CLEC Aggregate
608	P-5	Average Completion Notice Interval	Resale Centrex		>10	Non Mechanized	CLEC Aggregate
609	P-5	Average Completion Notice Interval	Resale ISDN		>10	Non Mechanized	CLEC Aggregate
610	P-5	Average Completion Notice Interval	LNP (Standalone)		>10	Non Mechanized	CLEC Aggregate
611	P-5	Average Completion Notice Interval	2W Analog Loop Design		>10	Non Mechanized	CLEC Aggregate
612	P-5	Average Completion Notice Interval	2W Analog Loop Non Design		>10	Non Mechanized	CLEC Aggregate
613	P-5	Average Completion Notice Interval	UNE Digital Loop < DS1		>10	Non Mechanized	CLEC Aggregate
614	P-5	Average Completion Notice Interval	UNE Digital Loop > DS1		>10	Non Mechanized	CLEC Aggregate
615	P-5	Average Completion Notice Interval	UNE Loop + Port Combinations		>10	Non Mechanized	CLEC Aggregate
616	P-5	Average Completion Notice Interval	UNE Switch Ports		>10	Non Mechanized	CLEC Aggregate
617	P-5	Average Completion Notice Interval	UNE Combo other		>10	Non Mechanized	CLEC Aggregate
618	P-5	Average Completion Notice Interval	UNE xDSL (HDSL, ADSL, and UCL)		>10	Non Mechanized	CLEC Aggregate
619	P-5	Average Completion Notice Interval	UNE ISDN (includes UDC)		>10	Non Mechanized	CLEC Aggregate
620	P-5	Average Completion Notice Interval	UNE Line Sharing		>10	Non Mechanized	CLEC Aggregate
621	P-5	Average Completion Notice Interval	Local Transport (Unbundled Interoffice Transport)		>10	Non Mechanized	CLEC Aggregate
622	P-5	Average Completion Notice Interval	Local Interconnection Trunks)			Non Mechanized	CLEC Aggregate
623	P-6	Coordinated Customer Conversions Interval	Unbundled Loops with INP				CLEC Aggregate
624	P-6	Coordinated Customer Conversions Interval	Unbundled Loops with LNP				CLEC Aggregate
625	P-6A	Coordinated Customer Conversions Interval-Hot	SL1 Time Specific				CLEC Aggregate
626	P-6A	Coordinated Customer Conversions Interval-Hot	SL1 Non Time Specific				CLEC Aggregate
627	P-6A	Coordinated Customer Conversions Interval-Hot	SL2 Time Specific				CLEC Aggregate
628	P-6A	Coordinated Customer Conversions Interval-Hot	SL2 Non Time Specific				CLEC Aggregate
629	P-6A	Coordinated Customer Conversions Interval-Hot	SL1 IDLC				CLEC Aggregate
630	P-6A	Coordinated Customer Conversions Interval-Hot	SL2 IDLC				CLEC Aggregate
631	P-6B	Coordinated Customer Conversions-Average Rec	Unbundled Loops with INP				CLEC Aggregate
632	P-6B	Coordinated Customer Conversions-Average Rec	Unbundled Loops with LNP				CLEC Aggregate
633	P-6C	CCC-% Prov Troubles Recd w/7 Days of Comple	UNE Loop Design	Dispatch			CLEC Aggregate
634	P-6C	CCC-% Prov Troubles Recd w/7 Days of Comple	UNE Loop Non-Design	Dispatch			CLEC Aggregate
635	P-6C	CCC-% Prov Troubles Recd w/7 Days of Comple	UNE Loop Design	Non Dispatch			CLEC Aggregate
636	P-6C	CCC-% Prov Troubles Recd w/7 Days of Comple	UNE Loop Non-Design	Non Dispatch			CLEC Aggregate
637	P-7	Cooperative Acceptance Testing-% of xDSL Loo	UNE x DSL				CLEC Aggregate
638	P-7	Cooperative Acceptance Testing-% of xDSL Loo	ADSL				CLEC Aggregate
639	P-7	Cooperative Acceptance Testing-% of xDSL Loo	HDSL				CLEC Aggregate
640	P-7	Cooperative Acceptance Testing-% of xDSL Loo	UCL				CLEC Aggregate
641	P-7	Cooperative Acceptance Testing-% of xDSL Loo	Other				CLEC Aggregate
642	P-8	& Prov Troubles w/I 30 Days of Service Order C	Resale Residence	Dispatch	<10		CLEC Aggregate
643	P-8	% Prov Troubles w/I 30 Days of Service Order C	Resale Business	Dispatch	<10		CLEC Aggregate
644	P-8	% Prov Troubles w/I 30 Days of Service Order C	Resale Design	Dispatch	<10		CLEC Aggregate
645	P-8	% Prov Troubles w/I 30 Days of Service Order C	Resale PBX	Dispatch	<10		CLEC Aggregate
646	P-8	% Prov Troubles w/I 30 Days of Service Order C	Resale Centrex	Dispatch	<10		CLEC Aggregate
647	P-8	% Prov Troubles w/I 30 Days of Service Order C	Resale ISDN	Dispatch	<10		CLEC Aggregate
648	P-8	% Prov Troubles w/I 30 Days of Service Order C	2W Analog Loop Design	Dispatch	<10		CLEC Aggregate
649	P-8	% Prov Troubles w/I 30 Days of Service Order C	2W Analog Loop Non Design	Dispatch	<10		CLEC Aggregate
650	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE Digital Loop <DS1	Dispatch	<10		CLEC Aggregate
651	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE Digital Loop >DS1	Dispatch	<10		CLEC Aggregate
652	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE x DSL (HDSL, ADSL and UCL)	Dispatch	<10		CLEC Aggregate
653	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE ISDN (includes UDC)	Dispatch	<10		CLEC Aggregate
654	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE Line Sharing	Dispatch	<10		CLEC Aggregate
655	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE Switch Ports	Dispatch	<10		CLEC Aggregate
656	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE Loop + Port Combinations	Dispatch	<10		CLEC Aggregate
657	P-8	% Prov Troubles w/I 30 Days of Service Order C	UNE Combo Other	Dispatch	<10		CLEC Aggregate
658	P-8	% Prov Troubles w/I 30 Days of Service Order C	Local Transport (Unbundled Interoffice Transport)	Dispatch	<10		CLEC Aggregate

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Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
659	P-8	% Prov Troubles w/I 30 Days of Service Order CLocal Interconnection Trunks					CLEC Aggregate
660	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Residence		Non Dispatch	<10		CLEC Aggregate
661	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Business		Non Dispatch	<10		CLEC Aggregate
662	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Design		Non Dispatch	<10		CLEC Aggregate
663	P-8	% Prov Troubles w/I 30 days of Service Order CoResale PBX		Non Dispatch	<10		CLEC Aggregate
664	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Centrex		Non Dispatch	<10		CLEC Aggregate
665	P-8	% Prov Troubles w/I 30 days of Service Order CoResale ISDN		Non Dispatch	<10		CLEC Aggregate
666	P-8	% Prov Troubles w/I 30 days of Service Order Co2W Analog Loop Design		Non Dispatch	<10		CLEC Aggregate
667	P-8	% Prov Troubles w/I 30 days of Service Order Co2W Analog Loop Non Design		Non Dispatch	<10		CLEC Aggregate
668	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Digital Loop <DS1		Non Dispatch	<10		CLEC Aggregate
669	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Digital Loop >DS1		Non Dispatch	<10		CLEC Aggregate
670	P-8	% Prov Troubles w/I 30 Days of Service Order CUNE xDSL (HDSL, ADSL and UCL)		Non Dispatch	<10		CLEC Aggregate
671	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE ISDN (includes UDC)		Non Dispatch	<10		CLEC Aggregate
672	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Line Sharing		Non Dispatch	<10		CLEC Aggregate
673	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Switch Ports		Non Dispatch	<10		CLEC Aggregate
674	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Loop + Port Combinations		Non Dispatch	<10		CLEC Aggregate
675	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Combo Other		Non Dispatch	<10		CLEC Aggregate
676	P-8	% Prov Troubles w/I 30 days of Service Order CoLocal Transport (Unbundled Interoffice Transport)		Non Dispatch	<10		CLEC Aggregate
677	P-8	% Prov Troubles w/I 30 days of Service Order CoLocal Interconnection Trunks					CLEC Aggregate
678	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Residence		Dispatch	>10		CLEC Aggregate
679	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Business		Dispatch	>10		CLEC Aggregate
680	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Design		Dispatch	>10		CLEC Aggregate
681	P-8	% Prov Troubles w/I 30 days of Service Order CoResale PBX		Dispatch	>10		CLEC Aggregate
682	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Centrex		Dispatch	>10		CLEC Aggregate
683	P-8	% Prov Troubles w/I 30 days of Service Order CoResale ISDN		Dispatch	>10		CLEC Aggregate
684	P-8	% Prov Troubles w/I 30 days of Service Order Co2W Analog Loop Design		Dispatch	>10		CLEC Aggregate
685	P-8	% Prov Troubles w/I 30 days of Service Order Co2W Analog Loop Non Design		Dispatch	>10		CLEC Aggregate
686	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Digital Loop <DS1		Dispatch	>10		CLEC Aggregate
687	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Digital Loop >DS1		Dispatch	>10		CLEC Aggregate
688	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE xDSL (HDSL, ADSL and UCL)		Dispatch	>10		CLEC Aggregate
689	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE ISDN (includes UDC)		Dispatch	>10		CLEC Aggregate
690	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Line Sharing		Dispatch	>10		CLEC Aggregate
691	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Switch Ports		Dispatch	>10		CLEC Aggregate
692	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Loop + Port Combinations		Dispatch	>10		CLEC Aggregate
693	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Combo Other		Dispatch	>10		CLEC Aggregate
694	P-8	% Prov Troubles w/I 30 days of Service Order CoLocal Transport (Unbundled Interoffice Transport)		Dispatch	>10		CLEC Aggregate
695	P-8	% Prov Troubles w/I 30 Days of Service Order CLocal Interconnection Trunks					CLEC Aggregate
696	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Residence		Non Dispatch	>10		CLEC Aggregate
697	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Business		Non Dispatch	>10		CLEC Aggregate
698	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Design		Non Dispatch	>10		CLEC Aggregate
699	P-8	% Prov Troubles w/I 30 days of Service Order CoResale PBX		Non Dispatch	>10		CLEC Aggregate
700	P-8	% Prov Troubles w/I 30 days of Service Order CoResale Centrex		Non Dispatch	>10		CLEC Aggregate
701	P-8	% Prov Troubles w/I 30 days of Service Order CoResale ISDN		Non Dispatch	>10		CLEC Aggregate
702	P-8	% Prov Troubles w/I 30 days of Service Order Co2W Analog Loop Design		Non Dispatch	>10		CLEC Aggregate
703	P-8	% Prov Troubles w/I 30 days of Service Order Co2W Analog Loop Non Design		Non Dispatch	>10		CLEC Aggregate
704	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Digital Loop < DS1		Non Dispatch	>10		CLEC Aggregate
705	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Digital Loop > DS1		Non Dispatch	>10		CLEC Aggregate
706	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE xDSL (HDSL, ADSL and UCL)		Non Dispatch	>10		CLEC Aggregate
707	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE ISDN (Includes UDC)		Non Dispatch	>10		CLEC Aggregate
708	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Line Sharing		Non Dispatch	>10		CLEC Aggregate
709	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Switch Ports		Non Dispatch	>10		CLEC Aggregate
710	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Loop + Port Combinations		Non Dispatch	>10		CLEC Aggregate
711	P-8	% Prov Troubles w/I 30 days of Service Order CoUNE Combo Other		Non Dispatch	>10		CLEC Aggregate
712	P-8	% Prov Troubles w/I 30 days of Service Order CoLocal Transport (Unbundled Interoffice Transport)		Non Dispatch	>10		CLEC Aggregate
713	P-8	% Prov Troubles w/I 30 days of Service Order CoLocal Interconnection Trunks					CLEC Aggregate
714	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Fully Mechanized	Dispatch	<10	CLEC Aggregate
715	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Fully Mechanized	Dispatch	<10	CLEC Aggregate
716	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Fully Mechanized	Dispatch	<10	CLEC Aggregate
717	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Fully Mechanized	Dispatch	<10	CLEC Aggregate
718	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Fully Mechanized	Dispatch	<10	CLEC Aggregate
719	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Fully Mechanized	Dispatch	<10	CLEC Aggregate
720	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Fully Mechanized	Dispatch	<10	CLEC Aggregate
721	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Fully Mechanized	Dispatch	<10	CLEC Aggregate
722	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Fully Mechanized	Dispatch	<10	CLEC Aggregate
723	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Fully Mechanized	Dispatch	<10	CLEC Aggregate
724	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Fully Mechanized	Dispatch	<10	CLEC Aggregate
725	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Fully Mechanized	Dispatch	<10	CLEC Aggregate
726	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Fully Mechanized	Dispatch	<10	CLEC Aggregate
727	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Fully Mechanized	Dispatch	<10	CLEC Aggregate
728	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Fully Mechanized	Dispatch	<10	CLEC Aggregate
729	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Fully Mechanized	Dispatch	<10	CLEC Aggregate
730	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Fully Mechanized	Dispatch	<10	CLEC Aggregate
731	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Fully Mechanized	Dispatch	<10	CLEC Aggregate
732	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Fully Mechanized			CLEC Aggregate
733	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
734	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
735	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
736	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
737	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
738	P-9	Total Service Order Cycle Time (TSOCT)	Reale ISDN	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
739	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
740	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
741	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
742	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
743	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
744	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
745	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
746	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
747	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
748	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
749	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
750	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
751	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Fully Mechanized			CLEC Aggregate
752	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Fully Mechanized	Dispatch	>10	CLEC Aggregate

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Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
753	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Fully Mechanized	Dispatch	>10	CLEC Aggregate
754	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Fully Mechanized	Dispatch	>10	CLEC Aggregate
755	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Fully Mechanized	Dispatch	>10	CLEC Aggregate
756	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Fully Mechanized	Dispatch	>10	CLEC Aggregate
757	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Fully Mechanized	Dispatch	>10	CLEC Aggregate
758	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Fully Mechanized	Dispatch	>10	CLEC Aggregate
759	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Fully Mechanized	Dispatch	>10	CLEC Aggregate
760	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Fully Mechanized	Dispatch	>10	CLEC Aggregate
761	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Fully Mechanized	Dispatch	>10	CLEC Aggregate
762	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Fully Mechanized	Dispatch	>10	CLEC Aggregate
763	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Fully Mechanized	Dispatch	>10	CLEC Aggregate
764	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Fully Mechanized	Dispatch	>10	CLEC Aggregate
765	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Fully Mechanized	Dispatch	>10	CLEC Aggregate
766	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Fully Mechanized	Dispatch	>10	CLEC Aggregate
767	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Fully Mechanized	Dispatch	>10	CLEC Aggregate
768	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Fully Mechanized	Dispatch	>10	CLEC Aggregate
769	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Fully Mechanized	Dispatch	>10	CLEC Aggregate
770	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Fully Mechanized			CLEC Aggregate
771	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
772	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
773	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
774	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
775	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
776	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
777	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
778	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
779	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
780	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
781	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
782	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
783	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
784	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
785	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
786	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
787	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
788	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
789	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Fully Mechanized			CLEC Aggregate
790	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Partially Mechanized	Dispatch	<10	CLEC Aggregate
791	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Partially Mechanized	Dispatch	<10	CLEC Aggregate
792	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Partially Mechanized	Dispatch	<10	CLEC Aggregate
793	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Partially Mechanized	Dispatch	<10	CLEC Aggregate
794	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Partially Mechanized	Dispatch	<10	CLEC Aggregate
795	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Partially Mechanized	Dispatch	<10	CLEC Aggregate
796	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Partially Mechanized	Dispatch	<10	CLEC Aggregate
797	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Partially Mechanized	Dispatch	<10	CLEC Aggregate
798	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Partially Mechanized	Dispatch	<10	CLEC Aggregate
799	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Partially Mechanized	Dispatch	<10	CLEC Aggregate
800	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Partially Mechanized	Dispatch	<10	CLEC Aggregate
801	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Partially Mechanized	Dispatch	<10	CLEC Aggregate
802	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Partially Mechanized	Dispatch	<10	CLEC Aggregate
803	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Partially Mechanized	Dispatch	<10	CLEC Aggregate
804	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Partially Mechanized	Dispatch	<10	CLEC Aggregate
805	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Partially Mechanized	Dispatch	<10	CLEC Aggregate
806	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Partially Mechanized	Dispatch	<10	CLEC Aggregate
807	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Partially Mechanized	Dispatch	<10	CLEC Aggregate
808	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Partially Mechanized			CLEC Aggregate
809	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
810	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
811	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
812	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
813	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
814	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
815	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
816	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
817	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
818	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
819	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
820	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
821	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
822	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
823	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
824	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
825	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
826	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
827	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Partially Mechanized			CLEC Aggregate
828	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Partially Mechanized	Dispatch	>10	CLEC Aggregate
829	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Partially Mechanized	Dispatch	>10	CLEC Aggregate
830	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Partially Mechanized	Dispatch	>10	CLEC Aggregate
831	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Partially Mechanized	Dispatch	>10	CLEC Aggregate
832	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Partially Mechanized	Dispatch	>10	CLEC Aggregate
833	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Partially Mechanized	Dispatch	>10	CLEC Aggregate
834	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Partially Mechanized	Dispatch	>10	CLEC Aggregate
835	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Partially Mechanized	Dispatch	>10	CLEC Aggregate
836	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Partially Mechanized	Dispatch	>10	CLEC Aggregate
837	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Partially Mechanized	Dispatch	>10	CLEC Aggregate
838	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops <DS1	Partially Mechanized	Dispatch	>10	CLEC Aggregate
839	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Partially Mechanized	Dispatch	>10	CLEC Aggregate
840	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Partially Mechanized	Dispatch	>10	CLEC Aggregate
841	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Partially Mechanized	Dispatch	>10	CLEC Aggregate
842	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Partially Mechanized	Dispatch	>10	CLEC Aggregate
843	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Partially Mechanized	Dispatch	>10	CLEC Aggregate
844	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Partially Mechanized	Dispatch	>10	CLEC Aggregate
845	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Partially Mechanized	Dispatch	>10	CLEC Aggregate
846	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Partially Mechanized			CLEC Aggregate

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Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
847	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
848	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
849	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
850	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
851	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
852	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
853	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
854	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
855	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
856	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
857	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loop < DS1	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
858	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loop > DS1	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
859	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
860	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
861	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
862	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
863	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
864	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
865	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Partially Mechanized			CLEC Aggregate
866	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Non Mechanized	Dispatch	<10	CLEC Aggregate
867	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Non Mechanized	Dispatch	<10	CLEC Aggregate
868	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Non Mechanized	Dispatch	<10	CLEC Aggregate
869	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Non Mechanized	Dispatch	<10	CLEC Aggregate
870	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Non Mechanized	Dispatch	<10	CLEC Aggregate
871	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Non Mechanized	Dispatch	<10	CLEC Aggregate
872	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Non Mechanized	Dispatch	<10	CLEC Aggregate
873	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Non Mechanized	Dispatch	<10	CLEC Aggregate
874	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Non Mechanized	Dispatch	<10	CLEC Aggregate
875	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Non Mechanized	Dispatch	<10	CLEC Aggregate
876	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Non Mechanized	Dispatch	<10	CLEC Aggregate
877	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Non Mechanized	Dispatch	<10	CLEC Aggregate
878	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Non Mechanized	Dispatch	<10	CLEC Aggregate
879	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Non Mechanized	Dispatch	<10	CLEC Aggregate
880	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Non Mechanized	Dispatch	<10	CLEC Aggregate
881	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Non Mechanized	Dispatch	<10	CLEC Aggregate
882	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Non Mechanized	Dispatch	<10	CLEC Aggregate
883	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Non Mechanized	Dispatch	<10	CLEC Aggregate
884	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Non Mechanized	Dispatch	<10	CLEC Aggregate
885	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
886	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
887	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
888	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
889	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
890	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
891	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
892	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
893	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
894	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
895	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
896	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
897	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
898	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
899	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
900	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
901	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
902	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
903	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Non Mechanized			CLEC Aggregate
904	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Non Mechanized	Dispatch	>10	CLEC Aggregate
905	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Non Mechanized	Dispatch	>10	CLEC Aggregate
906	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Non Mechanized	Dispatch	>10	CLEC Aggregate
907	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Non Mechanized	Dispatch	>10	CLEC Aggregate
908	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Non Mechanized	Dispatch	>10	CLEC Aggregate
909	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Non Mechanized	Dispatch	>10	CLEC Aggregate
910	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Non Mechanized	Dispatch	>10	CLEC Aggregate
911	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Non Mechanized	Dispatch	>10	CLEC Aggregate
912	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Non Mechanized	Dispatch	>10	CLEC Aggregate
913	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Non Mechanized	Dispatch	>10	CLEC Aggregate
914	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Non Mechanized	Dispatch	>10	CLEC Aggregate
915	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Non Mechanized	Dispatch	>10	CLEC Aggregate
916	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Non Mechanized	Dispatch	>10	CLEC Aggregate
917	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Non Mechanized	Dispatch	>10	CLEC Aggregate
918	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Non Mechanized	Dispatch	>10	CLEC Aggregate
919	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Non Mechanized	Dispatch	>10	CLEC Aggregate
920	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Non Mechanized	Dispatch	>10	CLEC Aggregate
921	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Non Mechanized	Dispatch	>10	CLEC Aggregate
922	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Non Mechanized			CLEC Aggregate
923	P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
924	P-9	Total Service Order Cycle Time (TSOCT)	Resale Business	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
925	P-9	Total Service Order Cycle Time (TSOCT)	Resale Design	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
926	P-9	Total Service Order Cycle Time (TSOCT)	Resale PBX	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
927	P-9	Total Service Order Cycle Time (TSOCT)	Resale Centrex	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
928	P-9	Total Service Order Cycle Time (TSOCT)	Resale ISDN	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
929	P-9	Total Service Order Cycle Time (TSOCT)	LNP (Standalone)	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
930	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Design	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
931	P-9	Total Service Order Cycle Time (TSOCT)	2W Analog Loop Non Design	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
932	P-9	Total Service Order Cycle Time (TSOCT)	UNE Switch Ports	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
933	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops < DS1	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
934	P-9	Total Service Order Cycle Time (TSOCT)	UNE Digital Loops > DS1	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
935	P-9	Total Service Order Cycle Time (TSOCT)	UNE Loop + Port Combinations	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
936	P-9	Total Service Order Cycle Time (TSOCT)	UNE Combo Other	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
937	P-9	Total Service Order Cycle Time (TSOCT)	UNE xDSL (HDSL, ADSL and UCL)	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
938	P-9	Total Service Order Cycle Time (TSOCT)	UNE ISDN	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
939	P-9	Total Service Order Cycle Time (TSOCT)	UNE Line Sharing	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
940	P-9	Total Service Order Cycle Time (TSOCT)	Local Transport (Unbundled Interoffice Transport)	Non Mechanized	Non Dispatch	>10	CLEC Aggregate

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941	P-9	Total Service Order Cycle Time (TSOCT)	Local Interconnection Trunks	Non Mechanized			CLEC Aggregate
942	P-10	LNP-Percent Missed Installations Appointmen ts	LNP		Dispatch	<10	CLEC Aggregate
943	P-10	LNP-Percent Missed Installations Appointmen ts	LNP		Dispatch	>10	CLEC Aggregate
944	P-10	LNP-Percent Missed Installations Appointmen ts	LNP		Non Dispatch	<10	CLEC Aggregate
945	P-10	LNP-Percent Missed Installations Appointmen ts	LNP		Non Dispatch	>10	CLEC Aggregate
946	P-11	LNP-Avg Disconnect Timeliness Interval & Disc	LNP	Mechanized			CLEC Aggregate
947	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Fully Mechanized	Dispatch	<10	CLEC Aggregate
948	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Fully Mechanized	Dispatch	>10	CLEC Aggregate
949	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Fully Mechanized	Non Dispatch	<10	CLEC Aggregate
950	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Fully Mechanized	Non Dispatch	>10	CLEC Aggregate
951	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Partially Mechanized	Dispatch	<10	CLEC Aggregate
952	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Partially Mechanized	Dispatch	>10	CLEC Aggregate
953	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Partially Mechanized	Non Dispatch	<10	CLEC Aggregate
954	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Partially Mechanized	Non Dispatch	>10	CLEC Aggregate
955	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Non Mechanized	Dispatch	<10	CLEC Aggregate
956	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Non Mechanized	Dispatch	>10	CLEC Aggregate
957	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Non Mechanized	Non Dispatch	<10	CLEC Aggregate
958	P-12	LNP-Total Service Order Cycle Time (TSOCT)	LNP	Non Mechanized	Non Dispatch	>10	CLEC Aggregate
959	M&R-1	Missed Repair Appointmen ts	Resale Residence		Dispatch		CLEC Aggregate
960	M&R-1	Missed Repair Appointmen ts	Resale Business		Dispatch		CLEC Aggregate
961	M&R-1	Missed Repair Appointmen ts	Resale Design		Dispatch		CLEC Aggregate
962	M&R-1	Missed Repair Appointmen ts	Resale PBX		Dispatch		CLEC Aggregate
963	M&R-1	Missed Repair Appointmen ts	Resale Centrex		Dispatch		CLEC Aggregate
964	M&R-1	Missed Repair Appointmen ts	Resale ISDN		Dispatch		CLEC Aggregate
965	M&R-1	Missed Repair Appointmen ts	2w analog loop design		Dispatch		CLEC Aggregate
966	M&R-1	Missed Repair Appointmen ts	2W Analog Loop Non Design		Dispatch		CLEC Aggregate
967	M&R-1	Missed Repair Appointmen ts	UNE Digital Loop < DS1		Dispatch		CLEC Aggregate
968	M&R-1	Missed Repair Appointmen ts	UNE Digital Loop > DS1		Dispatch		CLEC Aggregate
969	M&R-1	Missed Repair Appointmen ts	UNE Loop + Port Combinations		Dispatch		CLEC Aggregate
970	M&R-1	Missed Repair Appointmen ts	UNE Switch Ports		Dispatch		CLEC Aggregate
971	M&R-1	Missed Repair Appointmen ts	UNE Combo Other		Dispatch		CLEC Aggregate
972	M&R-1	Missed Repair Appointmen ts	UNE xDSL (HDSL, ADSL and UCL)		Dispatch		CLEC Aggregate
973	M&R-1	Missed Repair Appointmen ts	UNE ISDN		Dispatch		CLEC Aggregate
974	M&R-1	Missed Repair Appointmen ts	UNE Line Sharing		Dispatch		CLEC Aggregate
975	M&R-1	Missed Repair Appointmen ts	Local Interconnection Trunks		Dispatch		CLEC Aggregate
976	M&R-1	Missed Repair Appointmen ts	Local Transport (Unbundled Interoffice Transport)		Dispatch		CLEC Aggregate
977	M&R-1	Missed Repair Appointments	Resale Residence		Non Dispatch		CLEC Aggregate
978	M&R-1	Missed Repair Appointments	Resale Business		Non Dispatch		CLEC Aggregate
979	M&R-1	Missed Repair Appointments	Resale design		Non Dispatch		CLEC Aggregate
980	M&R-1	Missed Repair Appointments	Resale PBX		Non Dispatch		CLEC Aggregate
981	M&R-1	Missed Repair Appointments	Resale Centrex		Non Dispatch		CLEC Aggregate
982	M&R-1	Missed Repair Appointments	Resale ISDN		Non Dispatch		CLEC Aggregate
983	M&R-1	Missed Repair Appointments	2W Analog Loop Design		Non Dispatch		CLEC Aggregate
984	M&R-1	Missed Repair Appointments	2W Analog Loop Non Design		Non Dispatch		CLEC Aggregate
985	M&R-1	Missed Repair Appointments	UNE Digital Loop < DS1		Non Dispatch		CLEC Aggregate
986	M&R-1	Missed Repair Appointments	UNE Digital Loop > DS1		Non Dispatch		CLEC Aggregate
987	M&R-1	Missed Repair Appointments	UNE Loop + Port Combinations		Non Dispatch		CLEC Aggregate
988	M&R-1	Missed Repair Appointments	UNE Switch Ports		Non Dispatch		CLEC Aggregate
989	M&R-1	Missed Repair Appointments	UNE Combo Other		Non Dispatch		CLEC Aggregate
990	M&R-1	Missed Repair Appointments	UNE xDSL (HDSL, ADSL and UCL)		Non Dispatch		CLEC Aggregate
991	M&R-1	Missed Repair Appointments	UNE ISDN		Non Dispatch		CLEC Aggregate
992	M&R-1	Missed Repair Appointments	UNE Line Sharing		Non Dispatch		CLEC Aggregate
993	M&R-1	Missed Repair Appointments	Local Interconnection Trunks		Non Dispatch		CLEC Aggregate
994	M&R-1	Missed Repair Appointments	Local Transport (Unbundled Interoffice Transport)		Non Dispatch		CLEC Aggregate
995	M&R-2	Customer Trouble Report Rate	Resale Residence		Dispatch		CLEC Aggregate
996	M&R-2	Customer Trouble Report Rate	Resale Business		Dispatch		CLEC Aggregate
997	M&R-2	Customer Trouble Report Rate	Resale Design		Dispatch		CLEC Aggregate
998	M&R-2	Customer Trouble Report Rate	Resale PBX		Dispatch		CLEC Aggregate
999	M&R-2	Customer Trouble Report Rate	Resale Centrex		Dispatch		CLEC Aggregate
1000	M&R-2	Customer Trouble Report Rate	Resale ISDN		Dispatch		CLEC Aggregate
1001	M&R-2	Customer Trouble Report Rate	2W Analog Loop Design		Dispatch		CLEC Aggregate
1002	M&R-2	Customer Trouble Report Rate	2W Analog Loop Non Design		Dispatch		CLEC Aggregate
1003	M&R-2	Customer Trouble Report Rate	UNE Digital Loop < DS1		Dispatch		CLEC Aggregate
1004	M&R-2	Customer Trouble Report Rate	UNE Digital Loop > DS1		Dispatch		CLEC Aggregate
1005	M&R-2	Customer Trouble Report Rate	UNE Loop + Port Combinations		Dispatch		CLEC Aggregate
1006	M&R-2	Customer Trouble Report Rate	UNE Switch Ports		Dispatch		CLEC Aggregate
1007	M&R-2	Customer Trouble Report Rate	UNE Combo Other		Dispatch		CLEC Aggregate
1008	M&R-2	Customer Trouble Report Rate	UNE xDSL (HDSL, ADSL and UCL)		Dispatch		CLEC Aggregate
1009	M&R-2	Customer Trouble Report Rate	UNE ISDN		Dispatch		CLEC Aggregate
1010	M&R-2	Customer Trouble Report Rate	UNE Line Sharing		Dispatch		CLEC Aggregate
1011	M&R-2	Customer Trouble Report Rate	Local Interconnection Trunks		Dispatch		CLEC Aggregate
1012	M&R-2	Customer Trouble Report Rate	Local Transport (Unbundled Interoffice Transport)		Dispatch		CLEC Aggregate
1013	M&R-2	Customer Trouble Report Rate	Resale Residence		Non Dispatch		CLEC Aggregate
1014	M&R-2	Customer Trouble Report Rate	Resale Business		Non Dispatch		CLEC Aggregate
1015	M&R-2	Customer Trouble Report Rate	Resale Design		Non Dispatch		CLEC Aggregate
1016	M&R-2	Customer Trouble Report Rate	Resale PBX		Non Dispatch		CLEC Aggregate
1017	M&R-2	Customer Trouble Report Rate	Resale Centrex		Non Dispatch		CLEC Aggregate
1018	M&R-2	Customer Trouble Report Rate	Resale ISDN		Non Dispatch		CLEC Aggregate
1019	M&R-2	Customer Trouble Report Rate	2W Analog Loop Design		Non Dispatch		CLEC Aggregate
1020	M&R-2	Customer Trouble Report Rate	2W Analog Loop Non Design		Non Dispatch		CLEC Aggregate
1021	M&R-2	Customer Trouble Report Rate	UNE Digital Loop < DS1		Non Dispatch		CLEC Aggregate
1022	M&R-2	Customer Trouble Report Rate	UNE Digital Loop > DS1		Non Dispatch		CLEC Aggregate
1023	M&R-2	Customer Trouble Report Rate	UNE Loop + Port Combinations		Non Dispatch		CLEC Aggregate
1024	M&R-2	Customer Trouble Report Rate	UNE Switch Ports		Non Dispatch		CLEC Aggregate
1025	M&R-2	Customer Trouble Report Rate	UNE Combo Other		Non Dispatch		CLEC Aggregate
1026	M&R-2	Customer Trouble Report Rate	UNE xDSL (HDSL, ADSL and UCL)		Non Dispatch		CLEC Aggregate
1027	M&R-2	Customer Trouble Report Rate	UNE ISDN		Non Dispatch		CLEC Aggregate
1028	M&R-2	Customer Trouble Report Rate	UNE Line Sharing		Non Dispatch		CLEC Aggregate
1029	M&R-2	Customer Trouble Report Rate	Local Interconnection Trunks		Non Dispatch		CLEC Aggregate
1030	M&R-2	Customer Trouble Report Rate	Local Transport (Unbundled Interoffice Transport)		Non Dispatch		CLEC Aggregate
1031	M&R-3	Maintenance Average Duration	Resale Residence		Dispatch		CLEC Aggregate
1032	M&R-3	Maintenance Average Duration	Resale Business		Dispatch		CLEC Aggregate
1033	M&R-3	Maintenance Average Duration	Resale Design		Dispatch		CLEC Aggregate
1034	M&R-3	Maintenance Average Duration	Resale PBX		Dispatch		CLEC Aggregate

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1035	M&R-3	Maintenance Average Duration	Resale Centrex		Dispatch		CLEC Aggregate
1036	M&R-3	Maintenance Average Duration	Resale ISDN		Dispatch		CLEC Aggregate
1037	M&R-3	Maintenance Average Duration	2W Analog Loop Design		Dispatch		CLEC Aggregate
1038	M&R-3	Maintenance Average Duration	2W Analog Loop Non Design		Dispatch		CLEC Aggregate
1039	M&R-3	Maintenance Average Duration	UNE Digital Loop < DS1		Dispatch		CLEC Aggregate
1040	M&R-3	Maintenance Average Duration	UNE Digital Loop > DS1		Dispatch		CLEC Aggregate
1041	M&R-3	Maintenance Average Duration	UNE Loop + Port Combinations		Dispatch		CLEC Aggregate
1042	M&R-3	Maintenance Average Duration	UNE Switch Ports		Dispatch		CLEC Aggregate
1043	M&R-3	Maintenance Average Duration	UNE Combo Other		Dispatch		CLEC Aggregate
1044	M&R-3	Maintenance Average Duration	UNE xDSL (HDSL, ADSL and UCL)		Dispatch		CLEC Aggregate
1045	M&R-3	Maintenance Average Duration	UNE ISDN		Dispatch		CLEC Aggregate
1046	M&R-3	Maintenance Average Duration	UNE Line Sharing		Dispatch		CLEC Aggregate
1047	M&R-3	Maintenance Average Duration	Local Interconnection Trunks		Dispatch		CLEC Aggregate
1048	M&R-3	Maintenance Average Duration	Local Transport (Unbundled Interoffice Transport)		Dispatch		CLEC Aggregate
1049	M&R-3	Maintenance Average Duration	Resale Residence		Non Dispatch		CLEC Aggregate
1050	M&R-3	Maintenance Average Duration	Resale Business		Non Dispatch		CLEC Aggregate
1051	M&R-3	Maintenance Average Duration	Resale Design		Non Dispatch		CLEC Aggregate
1052	M&R-3	Maintenance Average Duration	Resale PBX		Non Dispatch		CLEC Aggregate
1053	M&R-3	Maintenance Average Duration	Resale Centrex		Non Dispatch		CLEC Aggregate
1054	M&R-3	Maintenance Average Duration	Resale ISDN		Non Dispatch		CLEC Aggregate
1055	M&R-3	Maintenance Average Duration	2W Analog Loop Design		Non Dispatch		CLEC Aggregate
1056	M&R-3	Maintenance Average Duration	2W Analog Loop Non Design		Non Dispatch		CLEC Aggregate
1057	M&R-3	Maintenance Average Duration	UNE Digital Loop < DS1		Non Dispatch		CLEC Aggregate
1058	M&R-3	Maintenance Average Duration	UNE Digital Loop > DS1		Non Dispatch		CLEC Aggregate
1059	M&R-3	Maintenance Average Duration	UNE Loop + Port Combinations		Non Dispatch		CLEC Aggregate
1060	M&R-3	Maintenance Average Duration	UNE Switch Ports		Non Dispatch		CLEC Aggregate
1061	M&R-3	Maintenance Average Duration	UNE Combo Other		Non Dispatch		CLEC Aggregate
1062	M&R-3	Maintenance Average Duration	UNE xDSL (HDSL, ADSL and UCL)		Non Dispatch		CLEC Aggregate
1063	M&R-3	Maintenance Average Duration	UNE ISDN		Non Dispatch		CLEC Aggregate
1064	M&R-3	Maintenance Average Duration	UNE Line Sharing		Non Dispatch		CLEC Aggregate
1065	M&R-3	Maintenance Average Duration	Local Interconnection Trunks		Non Dispatch		CLEC Aggregate
1066	M&R-3	Maintenance Average Duration	Local Transport (Unbundled Interoffice Transport)		Non Dispatch		CLEC Aggregate
1067	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Residence		Dispatch		CLEC Aggregate
1068	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Business		Dispatch		CLEC Aggregate
1069	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Design		Dispatch		CLEC Aggregate
1070	M&R-4	Percent Repeat Troubles Within 30 Days	Resale PBX		Dispatch		CLEC Aggregate
1071	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Centrex		Dispatch		CLEC Aggregate
1072	M&R-4	Percent Repeat Troubles Within 30 Days	Resale ISDN		Dispatch		CLEC Aggregate
1073	M&R-4	Percent Repeat Troubles Within 30 Days	2W Analog Loop Design		Dispatch		CLEC Aggregate
1074	M&R-4	Percent Repeat Troubles Within 30 Days	2W Analog Loop Non Design		Dispatch		CLEC Aggregate
1075	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Digital Loop < DS1		Dispatch		CLEC Aggregate
1076	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Digital Loop > DS1		Dispatch		CLEC Aggregate
1077	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Loop + Port Combinations		Dispatch		CLEC Aggregate
1078	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Switch Ports		Dispatch		CLEC Aggregate
1079	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Combo Other		Dispatch		CLEC Aggregate
1080	M&R-4	Percent Repeat Troubles Within 30 Days	UNE xDSL (HDSL, ADSL and UCL)		Dispatch		CLEC Aggregate
1081	M&R-4	Percent Repeat Troubles Within 30 Days	UNE ISDN		Dispatch		CLEC Aggregate
1082	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Line Sharing		Dispatch		CLEC Aggregate
1083	M&R-4	Percent Repeat Troubles Within 30 Days	Local Interconnection Trunks		Dispatch		CLEC Aggregate
1084	M&R-4	Percent Repeat Troubles Within 30 Days	Local Transport (Unbundled Interoffice Transport)		Dispatch		CLEC Aggregate
1085	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Residence		Non Dispatch		CLEC Aggregate
1086	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Business		Non Dispatch		CLEC Aggregate
1087	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Design		Non Dispatch		CLEC Aggregate
1088	M&R-4	Percent Repeat Troubles Within 30 Days	Resale PBX		Non Dispatch		CLEC Aggregate
1089	M&R-4	Percent Repeat Troubles Within 30 Days	Resale Centrex		Non Dispatch		CLEC Aggregate
1090	M&R-4	Percent Repeat Troubles Within 30 Days	Resale ISDN		Non Dispatch		CLEC Aggregate
1091	M&R-4	Percent Repeat Troubles Within 30 Days	2W Analog Loop Design		Non Dispatch		CLEC Aggregate
1092	M&R-4	Percent Repeat Troubles Within 30 Days	2W Analog Loop Non Design		Non Dispatch		CLEC Aggregate
1093	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Digital Loop < DS1		Non Dispatch		CLEC Aggregate
1094	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Digital Loop > DS1		Non Dispatch		CLEC Aggregate
1095	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Loop + Port Combinations		Non Dispatch		CLEC Aggregate
1096	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Switch Ports		Non Dispatch		CLEC Aggregate
1097	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Combo Other		Non Dispatch		CLEC Aggregate
1098	M&R-4	Percent Repeat Troubles Within 30 Days	UNE xDSL (HDSL, ADSL and UCL)		Non Dispatch		CLEC Aggregate
1099	M&R-4	Percent Repeat Troubles Within 30 Days	UNE ISDN		Non Dispatch		CLEC Aggregate
1100	M&R-4	Percent Repeat Troubles Within 30 Days	UNE Line Sharing		Non Dispatch		CLEC Aggregate
1101	M&R-4	Percent Repeat Troubles Within 30 Days	Local Interconnection Trunks		Non Dispatch		CLEC Aggregate
1102	M&R-4	Percent Repeat Troubles Within 30 Days	Local Transport (Unbundled Interoffice Transport)		Non Dispatch		CLEC Aggregate
1103	M&R-5	Out of Service (OOS) > 24 Hours	Resale Residence		Dispatch		CLEC Aggregate
1104	M&R-5	Out of Service (OOS) > 24 Hours	Resale Business		Dispatch		CLEC Aggregate
1105	M&R-5	Out of Service (OOS) > 24 Hours	Resale Design		Dispatch		CLEC Aggregate
1106	M&R-5	Out of Service (OOS) > 24 Hours	Resale PBX		Dispatch		CLEC Aggregate
1107	M&R-5	Out of Service (OOS) > 24 Hours	Resale Centrex		Dispatch		CLEC Aggregate
1108	M&R-5	Out of Service (OOS) > 24 Hours	Resale ISDN		Dispatch		CLEC Aggregate
1109	M&R-5	Out of Service (OOS) > 24 Hours	2W Analog Loop Design		Dispatch		CLEC Aggregate
1110	M&R-5	Out of Service (OOS) > 24 Hours	2W Analog Loop Non Design		Dispatch		CLEC Aggregate
1111	M&R-5	Out of Service (OOS) > 24 Hours	UNE Digital Loop < DS1		Dispatch		CLEC Aggregate
1112	M&R-5	Out of Service (OOS) > 24 Hours	UNE Digital Loop > DS1		Dispatch		CLEC Aggregate
1113	M&R-5	Out of Service (OOS) > 24 Hours	UNE Loop + Port Combinations		Dispatch		CLEC Aggregate
1114	M&R-5	Out of Service (OOS) > 24 Hours	UNE Switch Ports		Dispatch		CLEC Aggregate
1115	M&R-5	Out of Service (OOS) > 24 Hours	UNE Combo Other		Dispatch		CLEC Aggregate
1116	M&R-5	Out of Service (OOS) > 24 Hours	UNE xDSL (HDSL, ADSL and UCL)		Dispatch		CLEC Aggregate
1117	M&R-5	Out of Service (OOS) > 24 Hours	UNE ISDN		Dispatch		CLEC Aggregate
1118	M&R-5	Out of Service (OOS) > 24 Hours	UNE Line Sharing		Dispatch		CLEC Aggregate
1119	M&R-5	Out of Service (OOS) > 24 Hours	Local Interconnection Trunks		Dispatch		CLEC Aggregate
1120	M&R-5	Out of Service (OOS) > 24 Hours	Local Transport (Unbundled Interoffice Transport)		Dispatch		CLEC Aggregate
1121	M&R-5	Out of Service (OOS) > 24 Hours	Resale Residence		Non Dispatch		CLEC Aggregate
1122	M&R-5	Out of Service (OOS) > 24 Hours	Resale Business		Non Dispatch		CLEC Aggregate
1123	M&R-5	Out of Service (OOS) > 24 Hours	Resale Design		Non Dispatch		CLEC Aggregate
1124	M&R-5	Out of Service (OOS) > 24 Hours	Resale PBX		Non Dispatch		CLEC Aggregate
1125	M&R-5	Out of Service (OOS) > 24 Hours	Resale Centrex		Non Dispatch		CLEC Aggregate
1126	M&R-5	Out of Service (OOS) > 24 Hours	Resale ISDN		Non Dispatch		CLEC Aggregate
1127	M&R-5	Out of Service (OOS) > 24 Hours	2W Analog Loop Design		Non Dispatch		CLEC Aggregate
1128	M&R-5	Out of Service (OOS) > 24 Hours	2W Analog Loop Non Design		Non Dispatch		CLEC Aggregate

BellSouth Sub-Metrics

Index	Number	Measurement	Disagg 1	Disagg 2	Disagg 3	Disagg 4	For
1129	M&R-5	Out of Service (OOS) > 24 Hours	UNE Digital Loop < DS1		Non Dispatch		CLEC Aggregate
1130	M&R-5	Out of Service (OOS) > 24 Hours	UNE Digital Loop > DS1		Non Dispatch		CLEC Aggregate
1131	M&R-5	Out of Service (OOS) > 24 Hours	UNE Loop + Port Combinations		Non Dispatch		CLEC Aggregate
1132	M&R-5	Out of Service (OOS) > 24 Hours	UNE Switch Ports		Non Dispatch		CLEC Aggregate
1133	M&R-5	Out of Service (OOS) > 24 Hours	UNE Combo Other		Non Dispatch		CLEC Aggregate
1134	M&R-5	Out of Service (OOS) > 24 Hours	UNE xDSL (HDSL, ADSL and UCL)		Non Dispatch		CLEC Aggregate
1135	M&R-5	Out of Service (OOS) > 24 Hours	UNE ISDN		Non Dispatch		CLEC Aggregate
1136	M&R-5	Out of Service (OOS) > 24 Hours	UNE Line Sharing		Non Dispatch		CLEC Aggregate
1137	M&R-5	Out of Service (OOS) > 24 Hours	Local Interconnection Trunks		Non Dispatch		CLEC Aggregate
1138	M&R-5	Out of Service (OOS) > 24 Hours	Local Transport (Unbundled Interoffice Transport)		Non Dispatch		CLEC Aggregate
1139	M&R-6	Average Answer Time - Repair Centers	UNE Center				CLEC Aggregate
1140	M&R-6	Average Answer Time - Repair Centers	Resale Maintenance Center				CLEC Aggregate
1141	M&R-7	Mean Time to Notify CLEC of Network Outages					CLEC Aggregate
1142	B-1	Invoice Accuracy	Resale				CLEC Aggregate
1143	B-1	Invoice Accuracy	UNE				CLEC Aggregate
1144	B-1	Invoice Accuracy	Interconnection				CLEC Aggregate
1145	B-2	Mean Time to Deliver Invoices	Resale				CLEC Aggregate
1146	B-2	Mean Time to Deliver Invoices	UNE				CLEC Aggregate
1147	B-2	Mean Time to Deliver Invoices	Interconnection				CLEC Aggregate
1148	B-3	Usage Data Delivery Accuracy					CLEC Aggregate
1149	B-4	Usage Data Delivery Completeness					CLEC Aggregate
1150	B-5	Usage Data Delivery Timeliness					CLEC Aggregate
1151	B-6	Mean Time to Deliver Usage					CLEC Aggregate
1152	B-7	Recurring Charge Completeness	Resale				CLEC Aggregate
1153	B-7	Recurring Charge Completeness	UNE				CLEC Aggregate
1154	B-7	Recurring Charge Completeness	Interconnection				CLEC Aggregate
1155	B-8	Non-Recurring Charge Completeness	Resale				CLEC Aggregate
1156	B-8	Non-Recurring Charge Completeness	UNE				CLEC Aggregate
1157	B-8	Non-Recurring Charge Completeness	Interconnection				CLEC Aggregate
1158	D-1	Average Database Update Interval	LIDB				CLEC Aggregate
1159	D-1	Average Database Update Interval	Directory Listings				CLEC Aggregate
1160	D-1	Average Database Update Interval	Directory Assistance				CLEC Aggregate
1161	D-2	Percent Database Update Accuracy	LIDB				CLEC Aggregate
1162	D-2	Percent Database Update Accuracy	Directory Database				CLEC Aggregate
1163	D-3	Percent NXXs and LRNs Loaded by LERG Effec					CLEC Aggregate
1164	E-1	E911 - Timeliness	Resale Updates				CLEC Aggregate
1165	E-2	E911 - Accuracy	Resale Updates				CLEC Aggregate
1166	E-2	E911 - Mean Interval	Resale Updates				CLEC Aggregate
1167	TGP-1	Trunk Group Performance - Aggregate					CLEC Aggregate
1168	C-1	Collocation - Average Response Time	State				CLEC Aggregate
1169	C-1	Collocation - Average Response Time	Virtual - Initial				CLEC Aggregate
1170	C-1	Collocation - Average Response Time	Virtual - Augmen t				CLEC Aggregate
1171	C-1	Collocation - Average Response Time	Physical Caged - Initial				CLEC Aggregate
1172	C-1	Collocation - Average Response Time	Physical Caged - Augment				CLEC Aggregate
1173	C-1	Collocation - Average Response Time	Physical - Cageless - Initial				CLEC Aggregate
1174	C-1	Collocation - Average Response Time	Physical - Cageless - Augment				CLEC Aggregate
1175	C-2	Collocation - Average Arrangement Time	State				CLEC Aggregate
1176	C-2	Collocation - Average Arrangement Time	Virtual - Initial				CLEC Aggregate
1177	C-2	Collocation - Average Arrangement Time	Virtual - Augmen t				CLEC Aggregate
1178	C-2	Collocation - Average Arrangement Time	Physical Caged - Initial				CLEC Aggregate
1179	C-2	Collocation - Average Arrangement Time	Physical Caged - Augment				CLEC Aggregate
1180	C-2	Collocation - Average Arrangement Time	Physical Cageless - Initial				CLEC Aggregate
1181	C-2	Collocation - Average Arrangement Time	Physical Cageless - Augment				CLEC Aggregate
1182	C-3	Collocation Percent of Due Dates Missed	State				CLEC Aggregate
1183	C-3	Collocation Percent of Due Dates Missed	Virtual - initial				CLEC Aggregate
1184	C-3	Collocation Percent of Due Dates Missed	Virtual - Augment				CLEC Aggregate
1185	C-3	Collocation Percent of Due Dates Missed	Physical Caged - Initial				CLEC Aggregate
1186	C-3	Collocation Percent of Due Dates Missed	Physical Caged - Augment				CLEC Aggregate
1187	C-3	Collocation Percent of Due Dates Missed	Physical Cageless - Initial				CLEC Aggregate
1188	C-3	Collocation Percent of Due Dates Missed	Physical Cageless - Augment				CLEC Aggregate
1189	CM-1	Timeliness of Change Management Notices					CLEC Aggregate
1190	CM-2	Change Management Notice Average Delay Days					CLEC Aggregate
1191	CM-3	Timeliness of Documents Associated with Chang					CLEC Aggregate
1192	CM-4	Change Management Documentation Average De					CLEC Aggregate
1193	CM-5	Notification of CLEC Interface Outages	EDI				CLEC Aggregate
1194	CM-5	Notification of CLEC Interface Outages	CSOTS				CLEC Aggregate
1195	CM-5	Notification of CLEC Interface Outages	LENS				CLEC Aggregate
1196	CM-5	Notification of CLEC Interface Outages	TAG				CLEC Aggregate
1197	CM-5	Notification of CLEC Interface Outages	ECTA				CLEC Aggregate