

ORIGINAL

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Sent: Friday, October 06, 2006 1:53 PM
To: Filings@psc.state.fl.us
Cc: Fatool, Vicki; Randa, Johna A; Nancy Sims; Holland, Robyn P; Bixler, Micheale; Slaughter, Brenda ; Culpepper, Robert
Subject: 000121A-TP BellSouth's Responses to Action Items
Attachments: 000121A Responses to Action Items.pdf

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B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Incumbent Local Exchange Telecommunications Companies.

C. BellSouth Telecommunications, Inc.
 on behalf of Robert A. Culpepper

D. 19 pages total (includes Bayó letter, certificate of service, Responses and attachments)

E. BellSouth's Telecommunications, Inc.'s Responses to September 12, 2006 Conference Call Action Items and an a Revised Attachment 2 for Staff's First Set of Action Item No. 11.

<<000121A Responses to Action Items.pdf>>

CMP _____
 COM _____
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 RCA _____
 SCR _____
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 OTH _____

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

10/6/2006

Robert A. Culpepper
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ORIGINAL

October 6, 2006

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121A-TP

**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Responses to September 12, 2006 Conference Call Action Items (Nos. 1-3). We are also enclosing a revised attachment 2 for BellSouth's Responses to Staff's First Set of Action Items (No. 11). A copy of the same is being provided to all parties of record.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix
James Meza, III

652549

DOCUMENT NUMBER-DATE

09265 OCT-6 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

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

Electronic Mail and U.S. Mail this 6th day of October, 2006 to the following:

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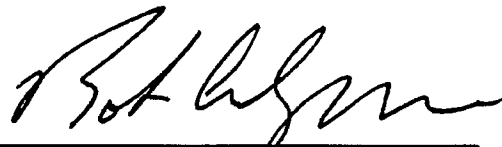
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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

REQUEST: For CM-11, please explain the steps between prioritization and implementation for a change request. Please provide a number of days to complete each step based on change request magnitude.

RESPONSE: BellSouth's Attachment 1 provides the release cycle phases, explanations of each release activity, and associated timeframes in terms of *weeks* to implement a system software release that includes requests for changes that impact BellSouth's wholesale operations.

The release cycle phases and timeframes are based upon a collaborative Change Control Process (CCP)-approved release plan that provides three production releases in a calendar year for change requests prioritized by CLECs.¹ These cycle phase times *are not based upon the magnitude or complexity of individual change requests* but, instead, are based upon building a release package within the annual release plan model. The current release plan model being utilized by BellSouth is illustrated in Attachment 2 (covering prioritizations for 2007 to be included in the 2008 release plan).

The release plan model for wholesale system changes is designed to ensure a high quality product based upon the following parameters/constraints:

- Software changes implemented within 60 weeks of CLEC prioritization (addressed by current SEEMs metrics).
- CLEC prioritization occurs three times in a calendar year (January, May, & September).
- CLEC total capacity for the three releases estimated at 1,250 units (50/50 Plan²).
- CLEC capacity will approximate an even distribution between the three releases.
- The CCP timelines govern by mandating a certain amount of lead-time to provide deliverables for certain phases of the process.
- A constant level of CLEC change requests input to utilize release capacity and to ensure most efficient use of BellSouth resources.

¹ The CCP's release plan was considered by the FPSC as part of the overall approval given to BellSouth's CCP during BellSouth's 271 petition before this Commission in 2002. As a reminder, the CLECs prioritize their own change requests as well as those submitted by BellSouth.

² Developed in 2002 under the guidance and involvement of the FPSC.

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FPSC Dkt. No. 00121A-TP
Responses to September 12, 2006
Conference Call Action Items
Filing Date: October 6, 2006
Item No. 1
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Each of the release cycle phases has multiple components, owned by various organizations, all of which must be coordinated and completed within a rigorous project-managed specific timeline in order for the release as a whole to succeed. In general, these steps overlap for subsequent releases as can be noted in Attachment 2. At given points in any year, three releases can be in progress – simultaneously – at some step in their respective release schedule. Therefore, once a release cycle has been initiated based upon CLEC prioritization, generally it is difficult to insert into that release a change request resulting from a subsequent CLEC prioritization.³

³ Although BellSouth has been able to include late-scoped non-complex change requests into releases already in process, these were implemented at additional expense to BellSouth in terms of costs and resource allocation.

REQUEST: For CM-11, please provide a proposal for developing timeframes for software releases based on the change request magnitude or complexity.

RESPONSE: BellSouth does not have a specific proposal to present at this time. Instead, BellSouth provides below the variables and constraints that would need to be considered for any revisions to the existing process, and expresses its willingness to work with the CLECs to develop a release plan model that can shorten the overall time from prioritization to implementation. In the interim, BellSouth proposes that there be no change to the current 60-week metric.

BellSouth proposes that CCP be the forum for the development of the release plan model because: a) it is a regional process that impacts the industry; b) it must be a collaborative effort using forecasting inputs from the CLECs; and, c) CCP is where the original release plan was developed.

Variables to be considered for developing a release plan model to shorten the time necessary to implement a change request are:

- Revisit the annual capacity needs of the CLECs (currently 1,250) and BellSouth.
- Increase the number of releases per year and associated CLEC prioritization.
- Decrease the size (capacity units) of the releases.
- Define the impacts of a complex change request (large capacity, multiple system impacts, etc.).
- Revisit CCP timelines that mandate a certain amount of lead-time for certain phases of the release cycle process
- Revisit time requirements for CAVE testing.
- Include potential impacts from regulatory mandates and/or industry direction.

The concept of this collaborative effort is to reevaluate the release cycle process to support CLEC change requests that vary in complexity, while recognizing the potential need to implement a single CLEC complex change. In other words, a new process needs to be developed for releases that support the vagaries of the CLECs' change requests. Only after that process has been defined can the appropriate metric be determined for CLEC prioritization-to-implementation time.

Once all of these variables are taken into consideration, a process can be developed for assigning prioritized change requests into release packages. The development of the actual release package for a given release is a straightforward, but iterative process. The amount of available capacity (units) for each of the software components is known, and each change request – in priority order – is evaluated against the available capacity and is assigned in the earliest release that has sufficient capacity in the appropriate software components. Any specific change request can and will be “bumped” from the first release to the second release to the third release and so forth, until a release is found or can be developed where sufficient capacity for that specific change request is available. Because not all change requests are the same size (in terms of capacity), nor of the same type (use different software components), the final result of this iterative exercise will be a release schedule that fills each release as fully and efficiently as possible with the highest priority items that “fit.”

Further, BellSouth will continue to use its best efforts to work with CLECs to implement prioritized change requests in a timeframe less than 60 weeks, when feasible. To illustrate this, all of the CCP change requests prioritized by the CLECs in 2006 will be implemented in less than 60 weeks after prioritization. This has been possible because the reduced number of change requests submitted by the CLECs, and their associated size and type. If the CLECs’ position is that 2006 is representative of going-forward years, this is the type of input that would be considered in a review of the release plan model, leading to possible subsequent revisions based upon such inputs.

The following are examples where BellSouth agreed to implement CLEC change requests in less than 60 weeks from prioritization:

May 24, 2006 Prioritization Meeting:

1. CR2326 - BellSouth 2 Pack Plan.
 - Initially targeted for implementation July 8, 2007, 60 weeks after prioritization.
 - CLEC asked for CR2326 to be considered for an earlier implementation.
 - BellSouth will implement on March 11, 2007.
2. CR2378 - LSF on Migration from Retail.
 - Initially targeted for implementation July 8, 2007, 60 weeks after prioritization.
 - CLEC asked for CR2326 to be considered for an earlier implementation.
 - BellSouth will implement on March 11, 2007.
3. CR2387 – Special Characters on Directory Listings.
 - Initially targeted for implementation July 8, 2007, 60 weeks after prioritization.
 - CLEC asked for CR2326 to be considered for an earlier implementation.
 - BellSouth will implement on March 11, 2007.

September 27, 2006 Prioritization Meeting:

1. CR2425 - Advance Listings.
 - Initially targeted for implementation November 11, 2007, 60 weeks after prioritization.
 - BellSouth has available capacity to accelerate this request to the July 8, 2007 release.

REQUEST: For CM-11, please provide the current timeframes for a software modification to BellSouth's retail operations for ordering, provisioning, and maintenance and repair systems based on magnitude of the change. As an example, provide the detailed timeframes from management acceptance to implementation for at least 5 modifications made to retail systems in the past six months.

RESPONSE: BellSouth's software modifications for retail applications and operations are implemented via system releases – not as individual modifications. While system releases for retail are similar in concept to the wholesale system releases previously discussed, the components that comprise the retail releases can cover a multitude of types of changes that have no analog to the wholesale environment, cross over several of BellSouth's retail divisions, or are comprised of multiple sub-applications that are developed separately but implemented in a common release. Therefore, a review of the two types of releases reveals – generally – an apples-to-oranges comparison that renders moot the comparison of timelines for implementation.

As further explanation, BellSouth presents below a non-proprietary high-level overview of five (5) retail releases either recently implemented or currently in progress, and ranging in levels of complexity/magnitude. The overview will illustrate that the bulk of the components that comprise the retail releases are varied, and that very few of the implemented changes compare to the types of changes implemented in a wholesale system release.

Release A: Implemented January 9, 2006 – 53 weeks from inception (Primarily applications for BellSouth's Consumer division)

- New tools to assist Help Desk representatives diagnose and troubleshoot service problems
- Suite of billing and servicing tools to assist service representatives
- Migration of high volume of customers to new database

Release B: Scheduled for Implementation December 2006 – 34 weeks from inception
(Applications for both BellSouth's Small Business and Community
Technologies divisions)

- New tools to help service representatives assist customers with billing issues and to make billing adjustments
- Introduction of new bill format
- Ability to order additional services

Release C: Scheduled for Implementation March 2007 – 30 weeks from inception (split
from Release B; allowed both Release B and C to have shortened
intervals)(Applications for both BellSouth's Small Business and Consumer
divisions)

- Security features
- Changes to customer information fields
- Enhanced troubleshooting and testing features
- Pricing changes
- New 3rd-Party sales partner capabilities

Release D: Implemented August 2006 – 78 weeks from inception (Primarily applications
for BellSouth IP Solutions organization)

- Integration of multiple operations support systems
- Modifications to multiple functional systems
- Deployment of 143 supporting servers

Release E: Implemented November 2005 – 73 weeks from inception (Primarily
applications for support of state government customers – first phase)

- Ordering, billing and reporting functions
- Applications integration

In addition to content differences between wholesale and retail system releases, there are environmental differences that impact wholesale/retail release management and prevent true like-for-like comparisons. For example:

- Release scheduling: Wholesale releases will be implemented according to a defined schedule designed to meet CCP/SQM timeframes – and a release may or may not include CLEC-prioritized change requests. To efficiently manage the ENCORE suite of systems that support the CLECs, BellSouth must implement releases to modify and upgrade system software and hardware components according to end-of-service-life parameters. Retail releases generally are scheduled according to specific needs, and not according to any particular schedule.
- Release control: Even though wholesale releases may be implemented without CLEC change requests, the presence of CLEC change requests has an effect on the overall implementation in terms of resources expended. BellSouth has no control over what the CLECs request and prioritize. Conversely, BellSouth controls all of the variables for retail releases, based upon business decisions about its own product/service mix, as well as operational efficiencies.
- Release model: Wholesale releases are implemented based upon the release model as covered in a previous response. To reiterate from that response, that model is based upon an optimum management capability in consideration of all of the previously listed parameters/constraints. To ensure the highest possible quality, BellSouth uses industry-proven release management techniques and processes for its retail releases as it does for wholesale releases. However, there is a higher degree of flexibility for retail releases because BellSouth is driven only by internal business needs and financial variables. There is no ‘standard’ model; each development plan can be constructed according to its specific needs and appropriate steps. Further, BellSouth retail releases can include disparate sub-applications that each can be developed simultaneously (and by different resource groups in different organizations) on separate and distinct release management tracks, and then aggregated to a single release implementation.

Release Cycle Activity Descriptions

ACTIVITIES

CLEC Prioritization: CLECs prioritize the CLEC Change Requests (CCP Type 5) and BellSouth Change Requests (CCP Type 4) that have been accepted since the last prioritization meeting. The 60 weeks CM-11 commitment starts with the date of prioritization.

Business Requirements: (10 weeks) Business Requirements define a Change Request in terms of the data fields, data values and processing steps that must be followed to achieve the desired result of the Change Request. For example, to modify an existing local order service request (LSR) process, a BellSouth Local Order Subject Matter Expert (SME) would develop detailed business rules to define how the modified process would work. The SME would review the business rules with other BellSouth Local Ordering SMEs and the requesting CLEC. When possible, the SME would conduct a manual test to ensure the new or updated business rules will achieve the requested result. The business rules would then be defined for both the manual process and the electronic process in the appropriate BellSouth CLEC Guideline document (like the BellSouth Local Ordering Handbook). Next functional requirements would be developed to define the changes in processing logic that would be needed to the electronic processes. Functional requirements describe all of the process steps and the sequence of process steps that must be followed for an electronic process to achieve the desired result.

In BellSouth's release process, functional requirements are written and reviewed with BellSouth's Information Technology ("IT") systems analysts to ensure BellSouth's IT staff understands the desired result that is to be delivered from the electronic systems. The IT development teams assess the impacts of the Change Request to their systems from the functional requirements and provide the initial estimates of the capacity required to implement the Change Request in the electronic systems. These functional requirements, also known as user requirements, are refined, and then reviewed with the CLEC community before being finalized (baselined).

Release Packaging: (6 weeks) Release Packaging is the process of adding prioritized Change Requests to a release for development and installation into the production environment. BellSouth's release cycle of 60 weeks was established in conjunction with the CLECs to support the 50/50 capacity plan allowing up to 1250 CLEC units of capacity per year.

During Release Packaging, all prioritized Change Requests are evaluated based on their priority, their estimated capacity required to implement and the applications being impacted. Change Requests are added to the release scope until either all prioritized Change Requests have been scoped into the release or the release capacity has been exhausted. Some release capacity is reserved to accommodate incremental work that is encountered during the development phase that may not have been anticipated in the initial estimate.

Analysis: (12 weeks) During Analysis, BellSouth's Systems Engineers determine the individual electronic system applications that will need to be modified or built to implement the Change Request in the electronic processing environment. System requirements are written for each system application that outlines and integrates all of the changes that will be made to the individual application(s) as a result of all the Change Requests in the release. Once the requirements are written, they are reviewed

Release Cycle Activity Descriptions

with the Functional Analysts, the Local Ordering SMEs and the other application System Engineers to ensure that all Business Requirements from the Change Requests have been captured in the release , and to identify which application will perform each Business Requirement.

Design: (8 weeks) Detail Design specifies the specific data fields, data values, data exchanges, processing flows and application processing logic changes that will be made to implement the Business Requirements per the various Change Requests included in the release.

Construction: (10 weeks) Construction is the actual programming of the application interfaces and modification of the application's code to implement the Change Requests in the release. Each application that is being changed is unit tested to ensure its programming changes satisfy the requirements for each Change Request that impact the application.

Testing: (13 weeks) BellSouth's first phase of Testing is to perform integration testing to ensure that all of the interfaces between all of the applications are sending and receiving data as designed and that orders will flow through to order generation. Integration testing would include both applications that have been modified and applications that were not modified for the release.

The next phase of Testing is functional testing to verify that the electronic system applications are processing orders that meet the business requirements defined for each Change Request included in the release.

Concurrent with functional testing, BellSouth also executes regression test cases to validate that electronic functions that are not being modified by the Change Requests scoped in the release will continue to function as they did prior to the release. Concurrent with functional testing, BellSouth conducts volume and performance testing to validate that the modified system code will continue to provide the same level of performance for the number of transactions that were being processed prior to the release.

Finally BellSouth performs user acceptance testing to verify flow through from each CLEC interface to ensure the new functionality of the Change Requests are being met, and to verify that unmodified functionality continues to process correctly in the electronic systems.

CAVE (CLEC Application Verification Environment) Testing: (5 weeks) CAVE provides the CLECs with the capability to perform both functional testing of all of the Change Requests within the release as well as regression testing to validate existing, unmodified functionality. BellSouth supports the CLEC application testing by providing a test case catalog of test cases that CLECs can use for their CAVE testing. BellSouth also assigns a single point of contact for the CLEC to discuss and help report any problems encountered during the CLEC's testing.

BellSouth allows CLECs to test a new release for 25 business days prior to the release being installed into the production environment. BellSouth commits to having 100% of their test cases executed prior to the start of CLEC testing in CAVE. BellSouth also provides CLECs with a daily defect tracking log to make CLECs aware of any defects that have been discovered during testing and the date BellSouth expects to implement

Release Cycle Activity Descriptions

the correction of the defect. BellSouth has had all known defects corrected and available for CLEC retesting prior to the release installation for all of the wholesale releases implemented in the past 2 years.

Installation: The Installation phase implements the release code into the production environment. BellSouth asks the CLECs to provide a "Go" or "No-Go" recommendation before BellSouth implements a new release into the production environment.

2008 Release Plan

| Release ID | Release Type | Description | Start | End | Y-axis |
|------------------------------|-----------------------|----------------------------|----------|----------|--------|
| EO 21.0 MAJOR Release | | | | | |
| 10207 | CLEC Production | Business Requirements | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Analysis | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Design | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Construction | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Integration Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | System Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Regression Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | User Acceptance Test (UAT) | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | CAVE Pre-Soak | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Release Target Capacity | 10/20/07 | 12/31/07 | |
| EO 22.0 MAJOR Release | | | | | |
| 10207 | CLEC Production | Business Requirements | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Analysis | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Design | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Construction | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Integration Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | System Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Regression Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | User Acceptance Test (UAT) | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | CAVE Pre-Soak | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Release Target Capacity | 10/20/07 | 12/31/07 | |
| EO 23.0 MAJOR Release | | | | | |
| 10207 | CLEC Production | Business Requirements | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Analysis | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Design | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Construction | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Integration Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | System Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Regression Test | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | User Acceptance Test (UAT) | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | CAVE Pre-Soak | 10/20/07 | 12/31/07 | |
| 10207 | Business Requirements | Release Target Capacity | 10/20/07 | 12/31/07 | |

Action Item No. 11
Attachment 2

| Examples of Relative Magnitude of SEEM Remedies | | | | | | |
|---|-------------|--|--|-----------------------------------|---|--|
| Measure Categories | Month Six | Aggregate Failure Multiplier Retail Analog | Aggregate Failure Multiplier Benchmark | Price per unit of affected volume | Average Monthly Revenue from a UNE-Loop | Equivalent Months of Revenue for BellSouth |
| OSS/Pre-Ordering | \$ 35.00 | 3 | 3 | \$ 105.00 | \$ 17.62 | 6.0 |
| Ordering | \$ 45.00 | NA | 2.5 | \$ 112.50 | \$ 17.62 | 6.4 |
| Service Order Accuracy | \$ 20.00 | 3 | 3 | \$ 60.00 | \$ 17.62 | 3.4 |
| Flow Through | \$ 65.00 | NA | 2.5 | \$ 162.50 | \$ 17.62 | 9.2 |
| Provisioning-Resale | \$ 200.00 | 3 | 3 | \$ 600.00 | \$ 20.00 | 30.0 |
| Provisioning-UNE | \$ 230.00 | 3 | 3 | \$ 690.00 | \$ 17.62 | 39.2 |
| Maintenance and Repair-Resale | \$ 200.00 | 3 | 3 | \$ 600.00 | \$ 20.00 | 30.0 |
| Maintenance and Repair-UNE | \$ 230.00 | 3 | 3 | \$ 690.00 | \$ 17.62 | 39.2 |
| LNP | \$ 615.00 | 3 | 3 | \$ 1,845.00 | \$ 17.62 | 104.7 |
| Billing | | 3 | 3 | | NA | NA |
| Trunk Group Performance | \$ 125.00 | 3 | 3 | \$ 375.00 | NA | NA |
| Collocation | \$ 3,165.00 | 3 | 3 | \$ 9,495.00 | NA | NA |

Notes:

1. Most benchmark measures multiply the fee schedule by 1.5 with an aggregate pass and 3 with an aggregate failure. Flow-Through and ordering fees are multiplied by 2.5 in the event of an aggregate failure. In addition, the Tier I fee schedule escalates with each month of consecutive failure for the CLEC up to month 6.
2. Based on average FL UNE-Loop recurring rates: Zone 1 - \$10.69 / Zone 2 - \$15.20 / Zone 3 - \$26.97, an average recurring charge for UNE = \$17.62 is used for comparison purposes. This is compared to the price per unit of affected volume for the SEEM plan.
3. All retail analog measures multiply the fee schedule by 1.5 with an aggregate pass and 3 with an aggregate failure. In addition, the Tier I fee schedule escalates with each month of consecutive failure for the CLEC up to month 6.
4. \$20.00 is an approximation for a Resale Business Line (1FB) in Florida. Florida General Services Subscriber Tariff had zone prices from \$22.00 to \$26.00. The \$24.00 average zone price was discounted by 16.8% to derive the ~\$20.00 figure.

| Examples of Relative Magnitude of SEEM Remedies | | | | | | |
|---|-------------|--|--|-----------------------------------|---|--|
| Measure Categories | Month Six | Aggregate Failure Multiplier Retail Analog | Aggregate Failure Multiplier Benchmark | Price per unit of affected volume | Average Monthly Revenue from a UNE-Loop | Equivalent Months of Revenue for BellSouth |
| OSS/Pre-Ordering | \$ 35.00 | 3 | 3 | \$ 105.00 | \$ 17.62 | 6.0 |
| Ordering | \$ 45.00 | NA | 2.5 | \$ 112.50 | \$ 17.62 | 6.4 |
| Service Order Accuracy | \$ 20.00 | 3 | 3 | \$ 60.00 | \$ 17.62 | 3.4 |
| Flow Through | \$ 65.00 | NA | 2.5 | \$ 162.50 | \$ 17.62 | 9.2 |
| Provisioning-Resale | \$ 200.00 | 3 | 3 | \$ 600.00 | \$ 20.00 | 30.0 |
| Provisioning-UNE | \$ 230.00 | 3 | 3 | \$ 690.00 | \$ 17.62 | 39.2 |
| Maintenance and Repair-Resale | \$ 200.00 | 3 | 3 | \$ 600.00 | \$ 20.00 | 30.0 |
| Maintenance and Repair-UNE | \$ 230.00 | 3 | 3 | \$ 690.00 | \$ 17.62 | 39.2 |
| LNP | \$ 615.00 | 3 | 3 | \$ 1,845.00 | \$ 17.62 | 104.7 |
| Billing | | 3 | 3 | | NA | NA |
| Trunk Group Performance | \$ 125.00 | 3 | 3 | \$ 375.00 | NA | NA |
| Collocation | \$ 3,165.00 | 3 | 3 | \$ 9,495.00 | NA | NA |

Notes:

1. Most benchmark measures multiply the fee schedule by 1.5 with an aggregate pass and 3 with an aggregate failure. Flow-Through and ordering fees are multiplied by 2.5 in the event of an aggregate failure. In addition, the Tier I fee schedule escalates with each month of consecutive failure for the CLEC up to month 6.
2. Based on average FL UNE-Loop recurring rates: Zone 1 - \$10.69 / Zone 2 - \$15.20 / Zone 3 - \$26.97, an average recurring charge for UNE = \$17.62 is used for comparison purposes. This is compared to the price per unit of affected volume for the SEEM plan.
3. All retail analog measures multiply the fee schedule by 1.5 with an aggregate pass and 3 with an aggregate failure. In addition, the Tier I fee schedule escalates with each month of consecutive failure for the CLEC up to month 6.
4. \$20.00 is an approximation for a Resale Business Line (1FB) in Florida. Florida General Services Subscriber Tariff had zone prices from \$22.00 to \$26.00. The \$24.00 average zone price was discounted by 16.8% to derive the ~\$20.00 figure.