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RECORDS AND
REPORTING

March 1, 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 Direct Testimony of David A. Coon, Cynthia K. Cox, and Dr. Edward J. Mulrow, 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
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Nancy B. White
R. Douglas Lackey

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CERTIFICATE OF SERVICE
Docket No. 000121-TP

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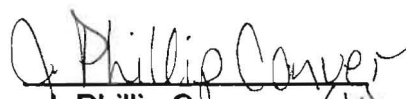
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1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF DAVID A. COON
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 000121-TP
5 MARCH 1, 2001
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH
8 TELECOMMUNICATIONS, INC. ("BELL SOUTH") AND YOUR BUSINESS
9 ADDRESS.
10

11 A. My name is David A. Coon. I am employed by BellSouth as Director –
12 Interconnection Services for the nine-state BellSouth region. My business
13 address is 675 West Peachtree Street, Atlanta, Georgia 30375.
14

15 Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE AND EDUCATIONAL
16 BACKGROUND?
17

18 A. My career at BellSouth spans over 21 years and includes positions in
19 Network, Regulatory, Finance, Corporate Planning, Small Business
20 Services and Interconnection Operations. Prior to my BellSouth
21 employment, I performed a variety of functions in the Network, Regulatory
22 and Marketing Support organizations of C&P Telephone Company-
23 Washington. I have extensive experience in the development and use of

1 quantitative measurements and results including the establishment,
2 analysis and monitoring of BellSouth process measures.

3 I received a Bachelors Degree in Civil Engineering from Ohio University
4 and a Masters Degree in Engineering Administration from George
5 Washington University. I received the Certified Management Accountant
6 (CMA) designation in 1996 from the Institute of Management Accountants.

7
8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9
10 A. I will individually address certain issues, specific to performance
11 measures, outlined in Appendix A of Florida Order No. PSC-01-0242-
12 PCO-TP and provide BellSouth's position on these issues.

13
14 Q. HOW IS YOUR TESTIMONY ORGANIZED?

15
16 A. My Testimony is organized according to the order of the specific issues
17 listed in Appendix A of the FPSC Order (Order No. PSC-01-0242-PCO-
18 TP). As a part of my response to issue 1.a, I will take some time to
19 provide an overview of BellSouth's proposal in this Docket, the BellSouth
20 Service Quality Measurement (SQM) Plan. BellSouth witnesses, Ms. Cox
21 and Dr. Mulrow will also address certain issues in their separately filed
22 testimony.

1 Q. HOW SHOULD THE RESULTS OF KPMG'S REVIEW OF BELLSOUTH
2 PERFORMANCE MEASURES BE INCORPORATED INTO THIS
3 PROCEEDING? (ISSUE A)

4
5 A. As the Florida Public Service Commission (Commission) is aware, the
6 KPMG review is currently in progress. KPMG is conducting not only a
7 comprehensive review of the adequacy of each of BellSouth's
8 measurements, but also a review of the need for each of the
9 measurements to insure that BellSouth is producing the appropriate
10 measurement set. Although unlikely, if the review is completed in time for
11 the hearing in this proceeding, BellSouth will address any appropriate
12 modifications to its SQM as part of this proceeding. However, if the review
13 is not completed in time for the hearing in this proceeding, the appropriate
14 modifications should be addressed as part of the next Performance
15 Assessment Plan review cycle. This review should occur approximately
16 six months from the completion of this proceeding.

17
18 Q. WHAT ARE THE APPROPRIATE SERVICE QUALITY MEASURES TO
19 BE REPORTED BY BELLSOUTH? (ISSUE 1.a)

20
21 A. The appropriate service quality measures to be reported by BellSouth are
22 those contained in the BellSouth Service Quality Measurements (SQMs),
23 which I have attached as Exhibit DAC-1. BellSouth's measurements are

1 the result of over two years of work with direction provided by several
2 state commissions and the FCC plus input from various ALECs. More
3 than 87 ALECs currently have agreements with BellSouth in Florida that
4 include the SQMs proposed by BellSouth. The SQMs are more than
5 adequate to allow the Florida Public Service Commission and the ALECs
6 to monitor BellSouth's performance and to determine that non-
7 discriminatory access to BellSouth's Operations Support Systems (OSSs)
8 is being provided to ALECs in Florida.

9

10 Q. PLEASE EXPLAIN WHAT THE SQM DOCUMENT PROPOSED BY
11 BELL SOUTH CONTAINS AND HOW TO READ IT?

12

13 A. The BellSouth SQM document, attached as Exhibit DAC-1, is a
14 comprehensive and detailed description of BellSouth's Service Quality
15 Measurements that are calculated to evaluate the quality of service
16 delivered to BellSouth's customers, both wholesale and retail. The SQM
17 is divided into eleven (11) sections, each one representing a different
18 group of measurements relating to a specific portion of BellSouth's
19 Operations Support Systems. For instance section 1 contains six (6)
20 distinct measurements dealing with access to Operations Support
21 Systems for both pre-ordering and maintenance & repair. Section 2
22 contains fifteen (15) measurements specifically directed at all phases of
23 the ordering process. Another section deals with provisioning and so forth.

1 The end result is eleven sections totaling seventy-one (71) measurement
2 categories.

3
4 In addition, there are three (3) appendices, A-C. Appendix A, Reporting
5 Scope, provides service groupings by categories, i.e., service order
6 activity type, pre-ordering query type, maintenance query type, etc.
7 Appendix B, Glossary of Acronyms and Terms, is just that, a glossary that
8 provides definitions for the most commonly used acronyms and terms
9 found throughout the document. Finally, Appendix C, BellSouth Audit
10 Policy, sets forth BellSouth's audit policy for both internal and external
11 audits of performance measurements.

12

13 Q. CAN YOU ILLUSTRATE WHAT IS CONTAINED IN EACH OF THE
14 MEASUREMENTS WITHIN THE ELEVEN SECTIONS BY PROVIDING
15 AN EXAMPLE?

16

17 A. Certainly. Please refer to Section 1, page 1-1 of Exhibit DAC-1 and look
18 at the first measurement, labeled "OSS-1" and the material related to that
19 measurement. As you can see, this measurement, and indeed all of the
20 measurements, begins with a "Definition" that briefly describes exactly
21 what the measurement is designed to demonstrate. In this case, the
22 measurement calculates the average response time for queries submitted
23 from pre-ordering Interfaces, such as LENS, TAG and RNS to certain

1 legacy systems. These queries are submitted by the ALEC and BellSouth
2 retail representatives to assess feature availability, validate addresses,
3 telephone numbers, reserve telephone numbers, and determine
4 appointment availability.

5
6 Following the definition are any “Exclusions” that identify certain
7 characteristics or external factors, that for various reasons, are not
8 relevant to the measurement and are therefore excluded from the
9 measurement. In this case there are none. However, if you turn to page
10 1-13 of Exhibit DAC-1, and look at the measurement labeled “Loop
11 Makeup – Response Time – Manual”, there is an example of an exclusion.
12 Specifically, the exclusion for that measurement covers electronically
13 submitted loop makeup inquiries. Obviously, it would be inappropriate to
14 include electronically submitted inquiries in a measurement of inquiries
15 submitted manually.

16
17 Returning to my discussion of the components of the measurements
18 labeled OSS-1, next comes the “Business Rules” that describe in detail
19 the components of the measurement and how they interact. An example
20 that is reflected under this measurement is the way the “start” and “stop”
21 times are defined for the measurement.

22

1 Following the “Business Rules” is the actual mathematical formula for
2 producing the measurement, described under the heading of “Calculation.”
3 This provides not only the numerator and denominator for the formula
4 calculations but also a definition of the components of the formula, i.e. in
5 this particular case, a = Date & Time of Legacy Response and b = Date &
6 Time of Legacy Request.

7
8 The next section is labeled “Report Structure.” The report structure
9 provides a definition of the key dimensions of the report. For instance, in
10 the example of the OSS Response Interval, OSS-1, OSS Response is a
11 measurement of the response interval for the aggregate of all ALECS in
12 the BellSouth Region. As a result its report structure is a regional
13 structure, as opposed to an ALEC or a product-specific structure.

14
15 Following “Report Structure” is the “Data Retained” section that describes
16 key elements of data for each measurement that is processed and
17 retained from the back-end OSSs and Legacy Systems in order to
18 produce the reports, i.e. the data must be correlated by month and there
19 must be rules built into the structure of the data that defines methods for
20 accessing the OSS and Legacy Systems.

21
22 Finally, there is a very important section, “SQM Disaggregation –
23 Analog/Benchmark,” that defines how each measurement is broken-down

1 in the report, i.e. in this case, by OSS and Legacy System, and the
2 standard to which we compare that measurement for detecting disparate
3 treatment. In this case, because there is not a retail equivalent for this
4 function, we use a benchmark of parity + 4 seconds.

5
6 The level of disaggregation is a very important component of BellSouth's
7 SQM or, for that matter, any other measurement system. The term
8 disaggregation refers to the breakdown, for reporting purposes, of
9 measurement categories into specific products, i.e. resale residence,
10 resale business and resale design; activity types, i.e. dispatch and non-
11 dispatch; and volumes, i.e. less than or equal to 10 circuits or greater than
12 10 circuits per order. Achieving an appropriate level of disaggregation is
13 important because measurements and reporting frequently occur only at
14 this level. To illustrate, please refer to the measurement category P-4,
15 Average Completion Interval (OCI) & Order Completion Interval, starting
16 on page 3-8 of Exhibit DAC-1. This describes a measure of how long it
17 takes BellSouth to install a service, once a valid Local Service Request is
18 received. Page 3-9 of Exhibit DAC-1 contains the SQM Disaggregation
19 and reporting level for this measurement category. The first line of this
20 table shows a line for Resale Residence and a retail analog of Retail
21 Residence. This means that the Order Completion Interval for Resale
22 Residence is compared to the Order Completion Interval for Retail
23 Residence. Thus there are two measurements; one compared to the

1 other. However this single comparison is further broken down into
2 categories of: 1) Dispatch, < 10 circuits; 2) Dispatch \geq 10 circuits, 3) Non-
3 dispatch, < 10 circuits; 4) Non-Dispatch \geq 10 circuits. Thus there are 4
4 measurements of resale residence compared to 4 measurements of retail
5 residence – for a total of 8 measurements per SQM Level of
6 Disaggregation. There are a total of 20 lines or products on the SQM
7 Level of Disaggregation, meaning that there are approximately 20 times 8
8 or approximately 160 measurements for the single category, P-4, Order
9 Completion Interval.

10
11 In addition to the basic categories that I have described above, for some
12 measurements, which BellSouth believes to be the most important
13 measures of whether we are providing non-discriminatory access to our
14 OSSs, there are two more sections.

15
16 The first is labeled “SEEM Measure,” and describes how the measure is
17 addressed in BellSouth’s Self-Effectuating Enforcement Mechanism
18 (SEEM). That is, the voluntary enforcement plan, as I will describe in
19 more detail below, has two types of penalties, a “Tier 1” level that is paid
20 to individual ALECs and a “Tier 2” level that is paid to the State of Florida.
21 This portion of the report describes whether the penalty associated with a
22 violation related to that measurement is a “Tier 1” or a “Tier 2” level

1 penalty, although in many cases the measurement falls into both
2 categories, as DAC-1 shows.

3
4 The second additional category is labeled "SEEM Disaggregation –
5 Analog/Benchmark," and defines how the measurement is broken down
6 into sub-metrics and what standard applies to each component in the
7 BellSouth Self-Effectuating Enforcement Mechanism. For example,
8 referring to the SEEM sections of P-3, Percent Missed Installation
9 Appointments, page 3-7, and O-9, Firm Order Confirmation Timeliness,
10 page 2-26 of Exhibit DAC-1, there are several levels of product
11 disaggregation. For the first one, Resale POTS, the comparison is its
12 equivalent Retail POTS. In the second example, O-9, the first level of
13 disaggregation is fully mechanized, which has a benchmark of 95% within
14 3 hours.

15
16 Q. WHAT ARE THE APPROPRIATE BUSINESS RULES, EXCLUSIONS,
17 CALCULATIONS, AND LEVELS OF DISAGGREGATION AND
18 PERFORMANCE STANDARDS FOR EACH MEASUREMENT? (ISSUE
19 1.b)

20
21 A. Each of the measurements included in the BellSouth SQMs, attached as
22 Exhibit DAC-1, has the appropriate business rules, exclusions,
23 calculations, levels of disaggregation and performance standards clearly

1 identified and BellSouth recommends that the Commission adopt those as
2 BellSouth has proposed them.

3
4 Q. CAN THIS MEASUREMENT PLAN BE EASILY MODIFIED?

5
6 A. No. This issue is crucial to the successful and timely resolution of this
7 docket. BellSouth has been working since 1998 on a mechanized delivery
8 system for the processing and delivery of its SQM reports. This system,
9 called Performance Measurements Analysis Platform (PMAP), is
10 described in detail in Exhibit DAC-2, attached to my testimony. This
11 exhibit highlights the enormous size and complexity of PMAP and
12 provides insight into the extraordinary effort required to modify existing
13 measurements or add new measurements. I make this point because
14 each modification and change to what BellSouth has proposed will require
15 a substantial amount of intensive effort developing the requirements
16 associated with the change, writing software code and testing the software
17 code to protect the integrity of the production PMAP system while
18 continuing to process and produce monthly SQM reports. In short, while
19 changes can be made, and have been made, changes are costly and time
20 consuming and should be made, in BellSouth's opinion, only if the value of
21 the change is readily evident.

1 Q. DOES BELLSOUTH'S PROPOSAL DIFFER FROM THE PROPOSAL OF
2 THE FPSC STAFF?

3
4 A. Yes, but only slightly. Attached as Exhibit DAC-3 is a matrix that
5 highlights differences between the performance measurements in the
6 Florida Staff recommendation and the SQMs proposed by BellSouth.

7
8 The key difference is that BellSouth's proposal has expanded the SQM to
9 include 13 additional measurement categories that were not a part of the
10 Florida Staff recommendation. These additional measurement categories
11 reflect work done in conjunction with generic performance measurement
12 proceedings in Georgia, Louisiana, North Carolina, and Florida. As an
13 example, of these 13 additional measurement categories, 4 are included
14 in the list of additional metrics to be investigated by KPMG as a part of the
15 Florida OSS Testing evaluation.

16
17 In addition, attached as Exhibit DAC-4, is a matrix that shows the
18 differences between the levels of disaggregation and the standards (retail
19 analog or benchmark) associated with each measurement proposed by
20 the Staff and by BellSouth. As with the measurement categories, the
21 levels of disaggregation and the standards reflect work in several states.

22

1 Q. WHAT ARE THE APPROPRIATE ENFORCEMENT MEASURES TO BE
2 REPORTED BY BELL SOUTH FOR TIER 1 AND TIER 2? (ISSUE 2.a)

3

4 A. The measurement set included in the BellSouth enforcement plan are
5 generally key measures in areas that affect customers. This
6 measurement set is patterned after those used in New York and Texas.
7 The New York plan resulted in a "critical" measurement set, and the Texas
8 plan identified a prioritized set of "high, medium, low" impact measures.
9 As I understand it, the Texas and New York commissions charged the
10 ALECs with identifying the measurement set that was the most 'customer
11 impacting'.

12

13 BellSouth's experience in providing access to IXCs, combined with the
14 outcome of prioritized measures from New York and Texas has resulted in
15 BellSouth offering of a similar key set of customer impacting metrics.

16 These enforcement measurements are detailed in the SQM, Exhibit DAC-
17 1 attached to my testimony and summarized in Exhibit DAC-5 also
18 attached to my testimony. As an example, please refer once again to P-3:
19 Percent Missed Installation Appointments, and in particular the SEEM
20 sections listed for this measurement on Page 3-7 of Exhibit DAC-1. The
21 SEEM Measure table indicates that this is a Tier 1 and a Tier 2
22 measurement. Percent Missed Installation Appointments is one key
23 provisioning measurements, perhaps the most important, as it is an
24 indicator of BellSouth's ability to achieve commitments to its customers.

1 Sub-metrics for this measurement category are listed in the SEEM
2 Disaggregation Table for 7 product categories. When these product
3 categories are compared to the retail analog, and if disparate performance
4 is detected, a penalty amount is calculated. The method of calculation
5 and the fee schedule are addressed later in my testimony.

6
7 Q. WHAT ARE THE APPROPRIATE LEVELS OF DISAGGREGATION FOR
8 COMPLIANCE REPORTING? (ISSUE 2.b)

9
10 A. The appropriate levels of disaggregation for compliance reporting are also
11 a part of Exhibit DAC-4 attached to my testimony. As is apparent from
12 Exhibit DAC-4, BellSouth's proposed disaggregation is generally
13 comparable to that contained in the Florida Staff's recommendation and in
14 some cases BellSouth proposes even more disaggregation. For example,
15 in Exhibit DAC-4 attached, page 2 of 6, for the measurement O-5, Percent
16 Rejected Service Requests, the Staff's recommendation shows 7 levels of
17 product disaggregation, Resale Residence, Resale Business, etc. The
18 BellSouth proposal for the same measurement shows 17 levels of product
19 disaggregation. This also holds true for O-6, Reject Interval and O-7, Firm
20 Order Confirmation Timeliness.

21
22 Q. WHAT PERFORMANCE DATA AND REPORTS SHOULD BE MADE
23 AVAILABLE BY BELL SOUTH TO ALECS? (ISSUE 3.a)

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23

A. The appropriate performance data and reports made available to the ALECs are those identified in the BellSouth SQM. For instance, referring once again to P-3: Percent Missed Installation Appointments on Page 3-6 of Exhibit DAC-1, the report structure indicates that there is a CLEC Specific report for Percent Missed Installation Appointments, reported in categories of <10 lines/circuits > 10 lines/circuits (except trunks), further broken down into dispatch (field work) or non-dispatch (no field work), for each of the SQM Levels of Disaggregation listed on the table at the top of page 3-7. Percent Missed Installation Appointments is a complex report primarily due to the fact that this measurement category is subdivided into so many sub-metrics. For an example of a less complex report, please refer to OS-1: Speed to Answer Performance/Average Speed to Answer – Toll, starting on page 6-1 of Exhibit DAC-1. As the name implies, there is simply a single number for the average speed of answer. Since the operator platforms serve both ALEC and BellSouth retail customers in the same queue, there is no separate measurement for ALEC and BellSouth retail.

I must note that although the plan is difficult to change because of its detailed and complete nature, in fact the SQM is a living document and may be subject to updates and modifications such as those associated with the KPMG audit of Florida's performance measurements. If the SQM

1 is updated, the most current version will be posted on the BellSouth web
2 site. The posted version should supercede all previous versions as the
3 appropriate measurements to be included in ALEC interconnection
4 agreements.

5
6 In addition, BellSouth voluntarily makes available the raw data utilized for
7 many of the measurements and a comprehensive raw data user manual.
8 This data and the user manual allow the ALECs to build customized
9 reports and further disaggregate reports based on individual ALEC needs.
10 I know of no other local exchange company that provides similar tools to
11 the ALEC community.

12
13 Q. WHERE, WHEN, AND IN WHAT FORMAT SHOULD BELL SOUTH
14 PERFORMANCE DATA AND REPORTS BE MADE AVAILABLE? (ISSUE
15 3.b)

16
17 A. Performance reports for all BellSouth SQMs are currently available
18 electronically on a monthly basis via BellSouth's web-site at
19 <https://pmap.bellsouth.com>. Further, BellSouth commits to having these
20 reports posted by the 30th day of the month for the preceding month's
21 activity in HTML format.

22

1 In its' proposal the FPSC Staff recommended posting by the 20th day.
2 BellSouth strongly objects to the 20th day for posting these reports. In the
3 past, the 20th day was occasionally achievable because of a much lower
4 volume of ALEC-specific data and performance measurement reports.
5 Today, there are over 200 ALECs in Florida. There are 105 ALEC specific
6 reports included in the BellSouth SQM that are posted on the BellSouth
7 web site and 129 BellSouth/ALEC aggregate level reports. If all 200
8 ALECs were to request reports each month this would equate to 200
9 ALECs times 105 reports (21,000 reports) plus the 129 aggregate reports
10 for a total of 21,129 reports posted on a monthly basis in Florida. In
11 addition there is the volume of underlying raw data. BellSouth makes
12 every effort to validate the reports before posting. Given this kind of
13 volume, BellSouth believes posting on the 30th day of the month is far
14 more reasonable.

15
16 With regard to the raw data, the web-site I mentioned does allow ALECs
17 to access electronically the raw data underlying those reports to the extent
18 such reports are derived from BellSouth's Performance Measurement
19 Analysis Platform (PMAP). The format of this raw data is a flat file that
20 can quickly be imported into a spreadsheet or a database management
21 program for further analysis and processing by the ALEC. These reports
22 will include the most critical ordering, provisioning, and maintenance &
23 repair measurements in which ALECs generally are interested, including,

1 but not limited to, FOC Timeliness, Reject Interval, Percent Missed
2 Installation Appointments, Average Completion Interval Order Completion
3 Interval Distribution, Missed Repair Appointments, Customer Trouble
4 Report Rate, and Maintenance Average Duration.

5
6 While every performance report is available electronically, BellSouth does
7 not have the capability to make available electronically the raw data that is
8 used to generate reports outside of PMAP. This would include the raw
9 data for the regional reports that are not specific to a single ALEC, which
10 cannot be efficiently generated electronically. The measurements that
11 reflect the Speed of Answer in the Ordering Center and Speed of Answer
12 in the Maintenance Center are good examples. These measurements
13 reflect the time during which a call is in queue until a BellSouth
14 representative answers the call. These work centers are regional in
15 nature and serve all ALECs, which means that hundreds of thousands of
16 calls are received each month. Although each call is individually timed
17 and the averages for the month are posted in the SQM reports, it is not
18 possible to electronically identify each and every ALEC call underlying
19 these SQM reports.

20
21 Q. SHOULD BELLSOUTH BE PENALIZED WHEN BELLSOUTH FAILS TO
22 POST THE PERFORMANCE DATA AND REPORTS TO THE WEB SITE
23 BY THE DUE DATE? (ISSUE 5.a)

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A. No. BellSouth should not be subjected to an automatic penalty for the late posting of reports. While BellSouth will make every reasonable effort to make every deadline imposed upon it, with the volume of data and reports that I discussed above, it would be foolish to assume that there will never be a problem posting a report. However, there is little evidence that late reporting is harmful to the ALECs or to the Commission. Furthermore the increasing complexity of the measurements and sub-metrics, the volume of data processed and the validation of reports prior to posting impose additional burdens on BellSouth that should not be subjected to a penalty. Although BellSouth will make every effort to complete this substantial undertaking by the due date each month, BellSouth should not be automatically penalized any (or every) time it fails in this effort. Certainly, if there was some systemic failure in posting reports there could be some need for Commission overview until the problem is resolved, but merely missing a filing date by a day or two should not be cause for concern. I will discuss the issue of automatic penalties in more detail under Issue 5.b below.

Q. IF SO, HOW SHOULD THE PENALTY AMOUNT BE DETERMINED, AND WHEN SHOULD BELL SOUTH BE REQUIRED TO PAY THE PENALTY?
(ISSUE 5.b)

1 A. Before answering this question, I must note that several issues in my
2 testimony involve both the legal question of the circumstances under
3 which penalties could be imposed and matters that relate more directly to
4 performance measurements. I do not profess to be qualified to render
5 legal opinions, however I will attempt to answer these issues according to
6 my basic understanding. I will not mention this caveat again in responding
7 to other issues that have a legal component.

8

9 Turning to Issue 5.b it is my understanding that the Florida Commission
10 cannot impose monetary penalties unless there is a violation of a
11 Commission Order, rule or statute. On page 5 of his direct testimony, Mr.
12 Stallcup appears to share this view. BellSouth would expect that its
13 comments regarding the posting of reports mentioned above would put
14 this issue in proper perspective and obviate the need for any penalty for
15 simply missing a posting date. However, if the Commission does decide
16 to impose a penalty on BellSouth for failure to post the performance data
17 and reports to the web site by the due date, then the amount proposed by
18 Staff of \$2,000 per day, paid to the Florida Public Service Commission is
19 acceptable to BellSouth, provided that the \$2,000 per day applies to the
20 aggregate of all reports and is not based on each individual report. I want
21 to reiterate, however, that I do not believe the ALECs are monetarily
22 harmed because reports are posted late, nor should the Commission be
23 concerned provided the late filing was not evidence of a systemic failure.

1 This is apparent given that this data is available for every ALEC
2 certificated in the BellSouth region but very few ALECs choose to access
3 this data.

4

5 Q. SHOULD BELLSOUTH BE PENALIZED IF PERFORMANCE DATA AND
6 REPORTS PUBLISHED ON THE BELLSOUTH WEB SITE ARE
7 INCOMPLETE OR INACCURATE? (ISSUE 6.a)

8

9 A. No. As I discussed in Issue 5.a above, BellSouth should not be subjected
10 to involuntary, automatic penalties for incomplete or inaccurate reports.
11 The definitions of 'incomplete' or 'inaccurate' are so imprecise that there
12 would likely be an ongoing administrative burden each month to determine
13 what is incomplete or inaccurate. As a precedent for incomplete or
14 inaccurate performance measurement reporting, it is instructional to
15 consider the principles governing accounting. Accounting principles have
16 long recognized that financial statements are prone to adjustment and
17 correction. There are procedures for handling adjustments, but to my
18 knowledge, none contain an automatic dollar penalty. From a
19 performance measurement reporting viewpoint, the primary objective
20 should be to provide complete and accurate reporting, identify omissions
21 and errors should they occur, and correct them expeditiously. Applying a
22 penalty, once an error has been corrected or a report has been completed
23 would seem to discourage such corrections, even if they were appropriate.

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Q. IF SO, HOW SHOULD THE PENALTY AMOUNT BE DETERMINED, AND WHEN SHOULD BELL SOUTH BE REQUIRED TO PAY THE PENALTY? (ISSUE 6.b)

A. It is my understanding that the Florida Commission cannot impose monetary damages unless it is in violation of a Commission Order, rule or statute. This opinion would appear to be consistent with that of Mr. Stallcup as stated on page 5 of his direct testimony. If the Commission does decide to impose a penalty on BellSouth for incomplete or inaccurate reports posted to the web site, then the amount proposed in the Staff proposal of \$400 per day, paid to the Florida Public Service Commission is acceptable to BellSouth, provided that the \$400 per day applies to the aggregate of all reports and not each incomplete or inaccurate report incrementally. As stated above, I do not believe the ALECs are monetarily harmed because portions of the reports are incomplete or inaccurate.

Q. WHAT REVIEW PROCESS, IF ANY, SHOULD BE INSTITUTED TO CONSIDER REVISIONS TO THE PERFORMANCE ASSESSMENT PLAN THAT IS ADOPTED BY THIS COMMISSION? (ISSUE 7)

A. BellSouth concurs in the proposed review process set forth in Section 3.0, Modifications to Measures, in the FPSC Staff proposal.

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Q. WHEN SHOULD THE PERFORMANCE ASSESSMENT PLAN BECOME EFFECTIVE? (ISSUE 8)

- A. This issue actually consists of two questions:
- 1) When should the enforcement portion of the Performance Assessment Plan become effective? BellSouth witness Ms. Cindy Cox will address this issue from an enforcement perspective in her direct testimony in this proceeding.
 - 2) When should all the measurements proposed by BellSouth in Exhibit DAC-1 be available? Assuming the Florida Public Service Commission issues an order in this proceeding by July 31, 2001 adopting the Service Quality Measurements proposed by BellSouth in this proceeding, BellSouth will produce all data and measurements included in the BellSouth proposal during the fourth quarter 2001.

Q. WHAT ARE THE APPROPRIATE ENFORCEMENT MEASUREMENT BENCHMARKS AND ANALOGS? (ISSUE 9)

A. The appropriate enforcement measurement benchmarks and analogs are included in Exhibit DAC-1 and summarized in Exhibit DAC-5. As an example, please refer once again to P-3: Percent Missed Installation

1 Appointments, and in particular the SEEM sections listed for this
 2 measurement on Page 3-7 of Exhibit DAC-1. The enforcement sub-
 3 metrics and the retail analog are listed in the SEEM Disaggregation Table.
 4 For convenience, they are summarized as follows:

<u>SEEM Disaggregation</u>	<u>SEEM Analog/Benchmark</u>
Resale POTS	Retail Res and Business (POTS)
Resale Design	Retail Design
UNE Loop + Port Comb	Retail Residence and Business
UNE Loops	Retail Res and Bus Dispatch
UNE xDSL	ADSL provided to Retail
UNE Line Sharing	ADSL provided to Retail
Local Interconnection Trunks	Parity with Retail

13
 14 Q. ISSUE 10 INVOLVES WHAT IS REFERRED TO AS A "ROOT CAUSE
 15 ANALYSIS." WHAT IS A ROOT CAUSE ANALYSIS?

16
 17 A. When a problem is detected that relates to BellSouth's delivery of services
 18 to ALECs, BellSouth may perform a Root Cause Analysis. This analysis is
 19 an often formalized, comprehensive, and detailed investigation of all the
 20 component activities related to the delivery of the service in question. It
 21 may includes participation by all BellSouth entities involved in the delivery
 22 of the service and include not only problem identification, but also the
 23 development and implementation of solutions. This is a very time

1 consuming and expensive process. In some instances, Root Cause
2 Analysis results may be made available and discussed with state
3 commissions and, in some cases, ALECs.

4
5 Q. UNDER WHAT CIRCUMSTANCES, IF ANY, SHOULD BELL SOUTH BE
6 REQUIRED TO PERFORM A ROOT CAUSE ANALYSIS? (ISSUE 10)

7
8 A. None. In my answer I have assumed this issue is limited to a root cause
9 analysis associated with an enforcement mechanism. An enforcement
10 plan, when and if it becomes effective, should function automatically (that
11 is, be self-effectuating) and avoid administrative burdens for the ALEC,
12 BellSouth and the Commission. Conducting root cause analysis is an
13 administrative process that is both burdensome and unnecessary given
14 that enforcement will provide the incentive to automatically correct
15 significant disparate treatment. This 'self-correction' process is a key by-
16 product of enforcement. BellSouth has the information necessary to
17 identify problems and the incentive, by virtue of enforcement penalties, to
18 correct those problems. There is no need to devote additional
19 commission and BellSouth resources into formalizing a process that is not
20 required.

21
22 Lastly, on page 6 of the direct testimony of FPSC Staff witness Paul W.
23 Stallcup, in Docket No. 000121-TP, dated February 7, 2001, Mr. Stallcup

1 states "I believe both BellSouth and the ALECs acknowledge that the self-
2 effectuating characteristic of an enforcement mechanism is essential.
3 Without this characteristic, the plan could lack the necessary immediacy to
4 encourage BellSouth to provide compliant service to ALECs, and could
5 also burden this Commission and the parties with frequent and lengthy
6 evidentiary proceedings." Root Cause Analysis is an example of a
7 process that would create a burden to the Commission and the parties.
8

9 Q. WHAT IS THE APPROPRIATE METHODOLOGY THAT SHOULD BE
10 EMPLOYED TO DETERMINE IF BELL SOUTH IS PROVIDING
11 COMPLIANT PERFORMANCE TO AN INDIVIDUAL ALEC? (TIER 1)
12 (ISSUE 11.a)

13
14 Q. HOW SHOULD PARITY BE DEFINED FOR PURPOSES OF THE
15 PERFORMANCE ASSESSMENT PLAN? (ISSUE 11.b)

16
17 A. While the FCC has not specifically used the term 'compliant performance',
18 I believe the following definitions of parity by the FCC applies: 1) where a
19 retail analog exists, the BOC must provide access to a competing carrier
20 in substantially the same time and manner as it provides to itself; 2) for
21 those functions that have no retail analogue, the BOC must provide
22 access that would offer an efficient carrier a meaningful opportunity to
23 compete. For those services where there is no retail analog, that is,

1 where BellSouth does not provide the same service or a comparable
2 service in its retail operations, the proper approach would be to use a
3 "benchmark". This is, of course, a methodology that is quite familiar to this
4 Commission and has been used by the Commission for years.

5
6 The methodology should be a simple comparison of the performance
7 provided to the individual ALEC to the performance standard appropriate
8 to the measurement category. This comparison should be over a period
9 of time and should consider the performance measurement results as a
10 whole, rather than focus solely on a single individual measurement. This
11 will provide the Commission with a complete perspective on the level of
12 performance being provided to the ALEC.

13
14 For those enforcement sub-metrics where BellSouth provides a similar
15 service to its retail operations, the measurement is a little more
16 complicated and is best accomplished through the application of statistical
17 tests. That is, we would measure how BellSouth performed on the retail
18 analog, and we would measure how BellSouth performed when it provided
19 the relevant service to the ALECs. If it appears that BellSouth provided
20 better service to the ALECs, the inquiry is at an end. If, on the other hand,
21 there is a question about whether BellSouth provided non-discriminatory
22 service, a statistical analysis, described in Dr. Mulrow's testimony, would

1 be undertaken to determine whether there was actually disparate
2 treatment.

3
4 Q. WHAT IS THE APPROPRIATE STRUCTURE? (ISSUE 11.c)

5
6 A. The structure of a Tier 1 enforcement plan should include clearly
7 articulated, pre-determined measurements and standards that encompass
8 a comprehensive range of carrier-to-carrier performance. The
9 enforcement plan should focus on measurements of key processes where
10 a failure in the process could have a direct, significant effect on
11 competition. It is not necessary for the enforcement plan to include all
12 measurements, all products, activities and processes. The FCC rejected
13 the argument that all measures be included in an enforcement plan by
14 stating:

15 We also believe that the scope of performance covered by the
16 Carrier-to-Carrier metrics is sufficiently comprehensive, and that the
17 New York Commission reasonably selected key competition-affecting
18 metrics from this list for inclusion in the enforcement plan. We
19 disagree with commenters who suggest that additional metrics must
20 be added to the plan in order to ensure its effectiveness, and note
21 that the New York Commission has considered and rejected similar
22 arguments. Bell Atlantic Order, at ¶439.

23

1 BellSouth proposes a two-tiered enforcement structure. Tier 1
2 enforcement mechanisms are triggered when BellSouth fails on any one
3 of the Tier-1 measurement categories for a particular month. The
4 resulting penalty is paid directly to individual ALEC. The measurements to
5 be included in the Tier-1 are noted in each measurement category of
6 Exhibit DAC-1. For convenience of the Commission, BellSouth's Tier-1
7 metrics are summarized as follows:

- 8 1. Acknowledgement Message Timeliness – EDI
- 9 2. Acknowledgement Message Timeliness – TAG
- 10 3. Acknowledgement Message Completeness EDI
- 11 4. Acknowledgement Message Completeness TAG
- 12 5. Firm Order Confirmation and Reject Response Completeness –
13 Fully Mechanized
- 14 6. Percent Missed Installation Appointments – Resale POTS
- 15 7. Percent Missed Installation Appointments – Resale Design
- 16 8. Percent Missed Installation Appointments – UNE Loop and Port
17 Combinations
- 18 9. Percent Missed Installation Appointments – UNE Loops
- 19 10. Percent Missed Installation Appointments – UNE xDSL
- 20 11. Percent Missed Installation Appointments – UNE Line Sharing
- 21 12. Percent Missed Installation Appointments – Local IC Trunks
- 22 13. Average Completion Interval – Resale POTS
- 23 14. Average Completion Interval – Resale Design

- 1 15. Average Completion Interval – UNE Loop and Port Combinations
- 2 16. Average Completion Interval – UNE Loops
- 3 17. Average Completion Interval – UNE xDSL
- 4 18. Average Completion Interval – UNE Line Sharing
- 5 19. Average Completion Interval – Local IC Trunks
- 6 20. Coordinated Customer Conversions Interval – Unbindled Loops
- 7 21. Coordinated Customer Conversions – Hot Cut Timeliness %
- 8 within interval - UNE Loops
- 9 22. Coordinated Customer Conversions – % Provisioning Troubles
- 10 Received within 7 days of a completed service order – UNE
- 11 Loops
- 12 23. % Provisioning Troubles within 30 days of Service Order
- 13 Completion – Resale POTS
- 14 24. % Provisioning Troubles within 30 days of Service Order
- 15 Completion – Resale Design
- 16 25. % Provisioning Troubles within 30 days of Service Order
- 17 Completion – UNE Loop and Port Combinations
- 18 26. % Provisioning Troubles within 30 days of Service Order
- 19 Completion – UNE Loops
- 20 27. % Provisioning Troubles within 30 days of Service Order
- 21 Completion – UNE xDSL
- 22 28. % Provisioning Troubles within 30 days of Service Order
- 23 Completion – UNE Line Sharing

- 1 29. % Provisioning Troubles within 30 days of Service Order
- 2 Completion – Local IC Trunks
- 3 30. LNP – Percent Missed Installation Appointments – LNP
- 4 31. LNP – Average Disconnect Timeliness Interval – LNP
- 5 32. Missed Repair Appointments – Resale POTS
- 6 33. Missed Repair Appointments – Resale Design
- 7 34. Missed Repair Appointments – UNE Loop and Port
- 8 Combinations
- 9 35. Missed Repair Appointments – UNE Loops
- 10 36. Missed Repair Appointments – UNE xDSL
- 11 37. Missed Repair Appointments – UNE Line Sharing
- 12 38. Missed Repair Appointments – Local IC Trunks
- 13 39. Customer Trouble Report Rate – Resale POTS
- 14 40. Customer Trouble Report Rate – Resale Design
- 15 41. Customer Trouble Report Rate – UNE Loop and Port
- 16 Combinations
- 17 42. Customer Trouble Report Rate – UNE Loops
- 18 43. Customer Trouble Report Rate – UNE xDSL
- 19 44. Customer Trouble Report Rate – UNE Line Sharing
- 20 45. Customer Trouble Report Rate – Local IC Trunks
- 21 46. Maintenance Average Duration – Resale POTS
- 22 47. Maintenance Average Duration – Resale Design

- 1 48. Maintenance Average Duration – UNE Loop and Port
- 2 Combinations
- 3 49. Maintenance Average Duration – UNE Loops
- 4 50. Maintenance Average Duration – UNE xDSL
- 5 51. Maintenance Average Duration – UNE Line Sharing
- 6 52. Maintenance Average Duration – Local IC Trunks
- 7 53. % Repeat Troubles within 30 days – Resale POTS
- 8 54. % Repeat Troubles within 30 days – Resale Design
- 9 55. % Repeat Troubles within 30 days – UNE Loop and Port
- 10 Combinations
- 11 56. % Repeat Troubles within 30 days – UNE Loops
- 12 57. % Repeat Troubles within 30 days – UNE xDSL
- 13 58. % Repeat Troubles within 30 days – UNE Line Sharing
- 14 59. % Repeat Troubles within 30 days – Local IC Trunks
- 15 60. Trunk Group Performance – CLEC Trunk Group
- 16 62. Collocation Percent of Due Dates Missed

17

18 These 62 metrics address key processes affecting individual ALECs and

19 include metrics for resellers and facility based ALECs.

20

21 Q. WHAT IS THE APPROPRIATE PARAMETER DELTA, IF ANY? (ISSUE

22 11.c.2)

23

1 A. As set forth in Dr. Mulrow's testimony, the selection of parameter Delta
2 involves deciding at what point statistically significant differences in
3 performance become material, and this decision is ultimately a business
4 judgment. Although the parties have proposed different values for Delta,
5 there is little in the way of hard information upon which this business
6 judgement can be made. For this reason, BellSouth believes that any
7 selection of Delta should be only an interim decision that will be reviewed
8 in light of the results produced by the use of this Delta.

9

10 The Louisiana Public Service Commission Staff Final Recommendation
11 specified a Delta of 1.0 for Tier 1, for a period of 6 months. The Louisiana
12 Staff recommended that there be a further evaluation after that period.

13 (Staff Final Recommendation, Docket U-22252 Subdocket C, pages 12
14 and 13. The Staff Final Recommendation was recently approved by the
15 Louisiana Public Service Commission. This decision was made after
16 nearly two years of workshops and comments by the parties and analysis
17 by the Louisiana Staff. BellSouth believes that it makes sense to build
18 upon the efforts of the Louisiana Commission and, at least for an initial
19 six-month period, utilize the Delta of 1.0 for Tier 1 selected by that
20 Commission. Following this 6-month period, further analysis and review
21 should be performed and incorporated into the next periodic review of the
22 overall plan.

23

1 Q. WHAT IS THE APPROPRIATE REMEDY CALCULATION? (ISSUE
2 11.c.3)

3

4 A. BellSouth's proposed remedy calculation is transaction based and similar
5 to the calculation methodology proposed by Mr. Stallcup. Exhibit DAC-6
6 contains BellSouth's proposed fee schedule for the Tier 1 enforcement
7 plan (Section A of Exhibit DAC-6) and several examples of the remedy
8 calculation (Section B of Exhibit DAC-6).

9

10 Q. WHAT IS THE APPROPRIATE BENCHMARK TABLE FOR SMALL
11 SAMPLE SIZES? (ISSUE 11.c.4)

12

13 A. This issue is important as it addresses the question of whether
14 benchmarks should be adjusted when sample sizes are small, due to the
15 fact that only a limited amount of transactions occurred. This is a
16 legitimate concern since it is possible that BellSouth is delivering
17 compliant performance but the compliant performance is not recognized
18 when performance is based on small samples. As an example, if a metric
19 has a benchmark of 90%, and an ALEC has 9 transactions, then each of
20 the 9 transactions must meet the standard for the sub metric. If there is
21 just one failure, the actual performance is 88.8% (8 divided by 9.)

22

1 BellSouth's proposes a 95% Confidence Small Sample Size table as listed
2 in DAC Exhibit 6, Section B, page 6.

3

4 Q. WHAT IS THE APPROPRIATE METHODOLOGY THAT SHOULD BE
5 EMPLOYED TO DETERMINE IF BELLSOUTH IS PROVIDING
6 COMPLIANT PERFORMANCE ON A STATEWIDE ALEC-AGGREGATE
7 BASIS? (TIER 2) (ISSUE 12.a)

8

9 Q. HOW SHOULD PARITY BE DEFINED FOR PURPOSES OF THE
10 PERFORMANCE ASSESSMENT PLAN? (ISSUE 12.b)

11

12 A. The answer to this issue is essentially the same as that provided under
13 issues 11.a and 11.b above, except that the focus is on the ALEC
14 aggregate result rather than on an individual ALEC.

15

16 Q. WHAT IS THE APPROPRIATE STRUCTURE? (ISSUE 12.c)

17

18 A. As with the Tier 1 structure, the Tier 2 enforcement plan should include
19 clearly articulated, pre-determined measurements and standards that
20 encompass a comprehensive range of carrier-to-carrier performance.
21 However Tier 2 enforcement metrics should focus on those processes
22 where recurring failures can have a significant effect on the ALEC
23 industry. Tier 2 enforcement mechanisms are triggered when BellSouth

1 fails three consecutive months for any one of the Tier-2 measurement
2 categories. The resulting penalty is paid to the Florida State Treasury or
3 other State agency as designated by this Commission. The
4 measurements to be included in the Tier-2 are noted in each
5 measurement category of Exhibit DAC-1. For the Commission's
6 convenience, BellSouth's Tier-2 metrics are summarized as follows:

- 7 1. Average Response Time – Pre-Ordering/Ordering
- 8 2. Interface Availability – Pre-Ordering/Ordering
- 9 3. Interface Availability – Maintenance & Repair
- 10 4. Loop Makeup – Response Time – Manual
- 11 5. Loop Makeup – Response Time – Electronic
- 12 6. Acknowledgement Message Timeliness – EDI
- 13 7. Acknowledgement Message Timeliness – TAG
- 14 8. Acknowledgement Message Completeness EDI
- 15 9. Acknowledgement Message Completeness TAG
- 16 10. Percent Flow-through Service Requests (Summary)
- 17 11. Reject Interval
- 18 12. Firm Order Confirmation Timeliness
- 19 13. Firm Order Confirmation and Reject Response Completeness –
20 Fully Mechanized
- 21 14. Percent Missed Installation Appointments – Resale POTS
- 22 15. Percent Missed Installation Appointments – Resale Design

- 1 16. Percent Missed Installation Appointments – UNE Loop and Port
- 2 Combinations
- 3 17. Percent Missed Installation Appointments – UNE Loops
- 4 18. Percent Missed Installation Appointments – UNE xDSL
- 5 19. Percent Missed Installation Appointments – UNE Line Sharing
- 6 20. Percent Missed Installation Appointments – Local IC Trunks
- 7 21. Average Completion Interval – Resale POTS
- 8 22. Average Completion Interval – Resale Design
- 9 23. Average Completion Interval – UNE Loop and Port Combinations
- 10 24. Average Completion Interval – UNE Loops
- 11 25. Average Completion Interval – UNE xDSL
- 12 26. Average Completion Interval – UNE Line Sharing
- 13 27. Average Completion Interval – Local IC Trunks
- 14 28. Coordinated Customer Conversions Interval – Unbundled Loops
- 15 29. Coordinated Customer Conversions – Hot Cut Timeliness %
- 16 within interval - UNE Loops
- 17 30. Coordinated Customer Conversions – % Provisioning Troubles
- 18 Received within 7 days of a completed service order – UNE
- 19 Loops
- 20 31. Cooperative Acceptance Testing - % xDSL Loops Tested
- 21 32. % Provisioning Troubles within 30 days of Service Order
- 22 Completion – Resale POTS

- 1 33. % Provisioning Troubles within 30 days of Service Order
- 2 Completion – Resale Design
- 3 34. % Provisioning Troubles within 30 days of Service Order
- 4 Completion – UNE Loop and Port Combinations
- 5 35. % Provisioning Troubles within 30 days of Service Order
- 6 Completion – UNE Loops
- 7 36. % Provisioning Troubles within 30 days of Service Order
- 8 Completion – UNE xDSL
- 9 37. % Provisioning Troubles within 30 days of Service Order
- 10 Completion – UNE Line Sharing
- 11 38. % Provisioning Troubles within 30 days of Service Order
- 12 Completion – Local IC Trunks
- 13 39. LNP – Percent Missed Installation Appointments – LNP
- 14 40. LNP – Average Disconnect Timeliness Interval – LNP
- 15 41. Missed Repair Appointments – Resale POTS
- 16 42. Missed Repair Appointments – Resale Design
- 17 43. Missed Repair Appointments – UNE Loop and Port
- 18 Combinations
- 19 44. Missed Repair Appointments – UNE Loops
- 20 45. Missed Repair Appointments – UNE xDSL
- 21 46. Missed Repair Appointments – UNE Line Sharing
- 22 47. Missed Repair Appointments – Local IC Trunks
- 23 48. Customer Trouble Report Rate – Resale POTS

- 1 49. Customer Trouble Report Rate – Resale Design
- 2 50. Customer Trouble Report Rate – UNE Loop and Port
- 3 Combinations
- 4 51. Customer Trouble Report Rate – UNE Loops
- 5 52. Customer Trouble Report Rate – UNE xDSL
- 6 53. Customer Trouble Report Rate – UNE Line Sharing
- 7 54. Customer Trouble Report Rate – Local IC Trunks
- 8 55. Maintenance Average Duration – Resale POTS
- 9 56. Maintenance Average Duration – Resale Design
- 10 57. Maintenance Average Duration – UNE Loop and Port
- 11 Combinations
- 12 58. Maintenance Average Duration – UNE Loops
- 13 59. Maintenance Average Duration – UNE xDSL
- 14 60. Maintenance Average Duration – UNE Line Sharing
- 15 61. Maintenance Average Duration – Local IC Trunks
- 16 62. % Repeat Troubles within 30 days – Resale POTS
- 17 63. % Repeat Troubles within 30 days – Resale Design
- 18 64. % Repeat Troubles within 30 days – UNE Loop and Port
- 19 Combinations
- 20 65. % Repeat Troubles within 30 days – UNE Loops
- 21 66. % Repeat Troubles within 30 days – UNE xDSL
- 22 67. % Repeat Troubles within 30 days – UNE Line Sharing
- 23 68. % Repeat Troubles within 30 days – Local IC Trunks

- 1 69. Invoice Accuracy
- 2 70. Mean Time to Deliver Invoices
- 3 71. Usage Data Delivery Accuracy
- 4 72. Trunk Group Performance – Aggregate
- 5 73. Collocation Percent of Due Dates Missed
- 6 74. Timeliness of Change Management Notices
- 7 75. Timeliness of Documents Associated with Change

8

9 These 75 metrics address key processes affecting ALECs in the

10 aggregate and include metrics for resellers and facility based ALECs..

11

12 Q. WHAT IS THE APPROPRIATE PARAMETER DELTA, IF ANY? (ISSUE

13 12.c.2)

14

15 A. As I stated previously, the appropriate approach is to select a Delta, use

16 that Delta for a certain time period, analyze the results, and only then

17 make a permanent selection of the parameter Delta.

18

19 Again, substantial work on the statistical testing parameter delta was done

20 in the Louisiana Workshop by several of the parties in this docket. As a

21 result of that work, the Louisiana Public Service Commission Staff Final

22 Recommendation specified a Delta of 0.5 for Tier 2 for a period of 6

23 months of. The recommendation suggested that a further evaluation be

1 conducted after that period. (Staff Final Recommendation, Docket U-
2 22252 Subdocket C, pages 12 and 13). The Staff Final Recommendation
3 was recently approved by the Louisiana Public Service Commission.

4
5 Therefore, BellSouth proposes that Delta for Tier 2 should be 0.5 for
6 period of 6 months of reporting. Following this 6-month period, further
7 analysis and review should be performed and incorporated into the next
8 periodic review of the overall plan.

9
10 Q. WHAT IS THE APPROPRIATE REMEDY CALCULATION? (ISSUE
11 12.c.3)

12
13 A. BellSouth's proposed Tier 2 remedy calculation methodology differs from
14 the methodology proposed by the FPSC Staff, attached to Staff witness
15 Paul Stallcup's direct testimony as Exhibit PWS-1 (page 6). BellSouth's
16 Tier 2 methodology is based on a failure in a Tier 2 sub metric for three
17 consecutive months such as January, February, March - or - February,
18 March, April. In contrast, Staff proposes to base Tier 2 remedy
19 calculations only results for a single month.

20
21 BellSouth proposes that when there is an indication of disparate treatment
22 at the CLEC aggregate level for a Tier 2 submetric for three consecutive
23 months, the affected volumes for the three month period are averaged and

1 multiplied by the appropriate penalty fee per item to arrive at the amount
2 of the remedy. As an example, consider the 5-month period February,
3 March, April, May and June. Further assume that the ALEC industry
4 received service below the standard for a Tier 2 sub-metric for each of
5 these months. Using the three month averaging, the affected volumes for
6 the months of February, March and April would be averaged and
7 multiplied by the appropriate Tier 2 penalty per item to arrive at a remedy
8 amount. Then the affected volumes for the months of March, April and
9 May would be averaged and multiplied by the appropriate Tier 2 penalty to
10 arrive at the next month's remedy amount.

11

12 The Tier 2 methodology proposed by staff uses monthly state aggregate
13 data. BellSouth strongly believes that at least three months worth of data
14 should be used in order to establish a pattern of consistent disparate
15 treatment to the ALEC industry. One of the underlying principles of
16 BellSouth's Tier 2 Enforcement Mechanism is the establishment of
17 consistent disparate treatment and one month is certainly not sufficient
18 time to establish consistent disparate treatment.

19

20 Q. WHAT IS THE APPROPRIATE BENCHMARK TABLE FOR SMALL
21 SAMPLE SIZES? (ISSUE 12.c.4)

22

23 A. Please refer to the answer for Issue 11.c.4 above.

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Q. WHEN SHOULD BELLSOUTH BE REQUIRED TO MAKE PAYMENTS FOR TIER 1 AND TIER 2 NONCOMPLIANCE, AND WHAT SHOULD BE THE METHOD OF PAYMENT? (ISSUE 13)

A. If ordered by the Commission, Tier 1 payments in the form of checks would be sent to the affected ALEC by the end of the second month following the month for which disparate performance is detected. In other words, payment would be rendered by the end of March for January performance.

If ordered by the Commission, Tier 2 payments in the form of checks would be sent to the Florida State Treasury or designated state agency by the end of the second month following the month for which disparate performance is detected. In other words, payment would be rendered by the end of March for January performance.

Q. SHOULD BELLSOUTH BE REQUIRED TO PAY INTEREST IF BELLSOUTH IS LATE IN PAYING AN ALEC THE REQUIRED AMOUNT FOR TIER 1? (ISSUE 14.a)

1 A. BellSouth's penalty proposal provides for the payment of interest for each
2 day BellSouth fails to make penalty payments the same as in the FPSC
3 Staff proposal.

4
5 Q. IF SO, HOW SHOULD THE INTEREST BE DETERMINED? (ISSUE
6 14.b)

7
8 A. As in the FPSC proposal, BellSouth proposes to pay the ALEC six (6)
9 percent simple interest per annum for each day after the due date that
10 BellSouth fails to pay the ALEC the required amount.

11
12 Q. SHOULD BELLSOUTH BE FINED FOR LATE PAYMENTS OF
13 PENALTIES UNDER TIER 2? IF SO, HOW? (ISSUE 15)

14
15 A. No. This is entirely unnecessary. BellSouth should not be subjected to a
16 fine (i. e. involuntary payment) for late payments of penalties. However,
17 BellSouth's proposal includes a voluntary payment to the Commission of
18 \$1,000 per day for each day after the due date that BellSouth fails to pay
19 the Tier 2 Enforcement Mechanism.

20
21 Q. WHAT IS THE APPROPRIATE PROCESS FOR HANDLING TIER 1
22 DISPUTES REGARDING PENALTIES PAID TO AN ALEC? (ISSUE 16)

23

1 A. BellSouth generally agrees with the proposal set forth by the FPSC Staff
2 in Section 4.6.4 of Exhibit PWS-1 in Mr. Stallcup's direct testimony.
3 However we would propose that this dispute process include provisions to
4 discourage submitting frivolous disputes, where the amount in dispute is
5 negligible or where it is consistently determined that the penalty payment
6 is correct.

7
8 Q. WHAT IS THE APPROPRIATE MECHANISM FOR ENSURING THAT
9 ALL PENALTIES UNDER TIER 1 AND TIER 2 ENFORCEMENT
10 MECHANISMS HAVE BEEN PAID AND ACCOUNTED FOR? (ISSUE 17)

11
12 A. BellSouth agrees with the proposal set forth by the FPSC Staff in Section
13 4.6.5 of Exhibit PWS-1 in Mr. Stallcup's direct testimony.

14
15 Q. WHAT LIMITATION OF LIABILITY, IF ANY, SHOULD BE APPLICABLE
16 TO BELLSOUTH? (ISSUE 18)

17
18 A. In Mr. Stallcup's direct testimony, Staff proposed limitations of liability for
19 such events as the submission of orders in unreasonable quantities or
20 times, for findings of noncompliance with a performance measurement
21 attributable to the ALEC, for a Force Majeure event, and for the ALEC's
22 non-compliance with the Interconnection Agreement.

23

1 BellSouth agrees with this proposal.

2

3 Q. WHAT TYPE OF CAP, IF ANY, IS APPROPRIATE FOR INCLUSION IN
4 THE PERFORMANCE ASSESSMENT PLAN? (ISSUE 19.a)

5

6 A. BellSouth proposes the use of an absolute cap. BellSouth's enforcement
7 plan was developed with the thought that an enforcement plan should be
8 self-effectuating. Consequently, each of the two tiers of remedies in the
9 enforcement plan is automatic. While the Commission can step in at any
10 time, remedies will be rendered as the performance is being monitored.
11 However, no Commission order is necessary to render payment. The
12 FPSC Staff's plan, on the other hand, contains a glaring contradiction to
13 the "self-effectuating" concept, the so-called "procedural cap." The
14 BellSouth enforcement plan sets an automatic financial cap (absolute cap)
15 based on a meaningful percentage of BellSouth's net revenues in Florida.
16 The Staff's procedural cap, on the other hand, only determines the point at
17 which the ILEC is permitted to seek relief from additional penalties from
18 the state commission. Thus the procedural cap is not really a cap at all,
19 but rather a threshold that must be reached before the process of setting a
20 cap begins.

21

22 A more logical approach is to set the cap and determine the total amount
23 at risk at the outset. A procedural threshold would simply defer this

1 decision. Furthermore, the proceedings, testimony, analysis, filing of
2 evidence, and hearing needed to set a real cap could take months.
3 During this time, the penalty payments would presumably continue,
4 leading to the potential for irreversible financial damage to BellSouth. For
5 example, assume that a procedural cap is set at 35% of BellSouth's net
6 operating revenue. During the months that will be needed to determine
7 where the absolute cap should be set, penalties would continue to accrue.
8 If, in this example, the Commission ultimately determines that 35% is an
9 appropriate absolute cap, then the payments over this amount made
10 during the pendency of the proceeding could not be recovered. (i.e. it is
11 unlikely that the ALECs would voluntarily return any excess payments.)

12
13 While BellSouth strongly disagrees with the concept of a procedural cap, if
14 the Commission deems this approach necessary, the Commission should
15 structure the process to reduce the prospect of irreversible financial harm
16 to BellSouth. BellSouth recommends that (1) the procedural cap or
17 threshold should be set at a very low amount (i. e. well below what any
18 reasonable absolute cap might be, and (2) after the procedural cap is
19 reached, further penalty payments should be suspended until the
20 Commission sets the absolute cap.

21
22 In any event, it is important to remember that the self-effectuating cap in
23 the enforcement plan is not an overall cap on BellSouth's liability for

1 performance failures. As the FCC has pointed out, a penalty plan is not
2 "the only means of ensuring that [the RBOC] continues to provide
3 nondiscriminatory service to competing carriers." *Bell Atlantic Order*, ¶
4 435. Thus, any characterization of the enforcement cap as an absolute
5 cap on BellSouth's liability for performance failures is incorrect. Moreover,
6 the New York, Texas, Kansas and Oklahoma plans all have annual
7 monetary caps similar to the absolute cap proposed by BellSouth.

8
9 Q. WHAT IS THE APPROPRIATE DOLLAR VALUE OF A CAP IF
10 APPLICABLE? (ISSUE 19.b)

11
12 A. BellSouth believes that the appropriate dollar value of the absolute cap
13 should be 36% of BellSouth's net operating revenues resulting from its
14 Florida operations. This 36% value for cap is consistent with the cap
15 amounts approved by the FCC in approving the Long Distance
16 applications of SBC and Bell Atlantic and more recently in the Kansas and
17 Oklahoma applications.

18
19 BellSouth believes that the recommendation by Mr. Stallcup of 39%, on
20 page 18 of his direct testimony is excessive, particularly in light of the fact
21 that he further recommends that this be a procedural cap (see pages 17-
22 18 of Mr. Stallcup's direct testimony), which allows the percentage to go
23 even higher at the discretion of the Florida Commission. It is possible Mr.

1 Stallcup may have based his recommendation of 39% on events in Bell
2 Atlantic / New York. However the 39% cap for Bell Atlantic/New York
3 includes a 3% adjustment to off-set a major OSS malfunction which
4 occurred after the granting of 271 relief in New York. This situation will not
5 occur in BellSouth.

6
7 Q. WHAT PROCESS, IF ANY SHOULD BE USED TO DETERMINE
8 WHETHER PENALTIES IN THE EXCESS OF THE CAP SHOULD BE
9 REQUIRED? (ISSUE 20)

10
11 A. As I previously testified, BellSouth believes that the only appropriate cap
12 would be an absolute cap. Therefore, there would be no penalties in
13 excess of the cap.

14
15 Q. IF THERE IS A CAP, FOR WHAT PERIOD SHOULD THE CAP APPLY?
16 (ISSUE 21)

17
18 A. BellSouth believes that an absolute cap should be applied on an annual
19 basis.

20
21 Q. SHOULD THE PERFORMANCE ASSESSMENT PLAN INCLUDE A
22 MARKET PENETRATION ADJUSTMENT, AND IF SO, HOW SHOULD
23 SUCH AN ADJUSTMENT BE STRUCTURED? (ISSUE 22)

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A. No. The market penetration adjustment proposed by Staff specifies a trebling of the penalty amount to the State Treasury for selected measurements of advanced and nascent services such as Loop Port Combinations, xDSL, and Line Sharing. This adjustment will unfairly penalize BellSouth for ALECs' business decisions not to include Florida in initial entry level strategies or to target other areas before moving to Florida. The FCC BA 271 Order states at ¶ 427 "Congress specifically declined to adopt a market share or other similar test for BOC entry into long distance, and we have no intention of establishing one here..."

BellSouth's remedy plan is comprehensive in itself, offering two tiers of incentives. Tier-1 remedies the individual ALEC. Tier-2 addresses the ALECs in the aggregate. BellSouth's remedy plan does not require additional business rules to ensure it pays special attention to ALEC performance based on market penetration.

Q. SHOULD THE PERFORMANCE ASSESSMENT PLAN INCLUDE A COMPETITIVE ENTRY VOLUME ADJUSTMENT, AND IF SO, HOW SHOULD SUCH AN ADJUSTMENT BE STRUCTURED? (ISSUE 23)

A. No. On page 16, line 15 of his direct testimony, Mr. Stallcup describes the Competitive Entry Volume adjustment as follows: "This adjustment to the

1 basic remedy payment mechanism is intended to help protect a small
2 ALEC's ability to establish and maintain a presence in the local exchange
3 market." Mr. Stallcup proposes that the adjustment result in a trebling of
4 "the basic per transaction penalty amounts for sub measures if there are
5 25 or fewer transactions per month and double the payment if there are
6 between 25 and 50 transactions per month. (Page 16, Lines 19 – 22)

7
8 There are two problems with this approach. First, the adjustment is
9 targeted as protection for the small ALEC. However the criteria for the
10 application of the adjustment is based on the number of transactions, not
11 the size of the ALEC. Depending on the sub-metric, a large ALEC can,
12 and does, have a small number of transactions in a given month.

13
14 Secondly, the thresholds per sub-metric, 25 or 50, are set at such a high
15 level so as to include large ALECs. To illustrate, consider an example
16 involving the enforcement measurement category C-3, Collocation,
17 Percent of Due Dates Missed. This measurement category is proposed
18 as a Tier 1 enforcement metric by Mr. Stallcup and by BellSouth. For the
19 month of January 2001, 105 collocation arrangements were completed.
20 There are approximately 65 facility based ALECs operating in Florida for
21 an approximate average of 2 collocation arrangements per ALEC. This is
22 a crude comparison but it should be apparent that if any collocation due
23 date was missed, even slightly, it would very likely fall below the threshold

1 of 25 per ALEC per sub-metric and result in triple penalties to the ALEC
2 regardless of the size of the ALEC. Similar examples could be cited for
3 other measurements with relatively low volumes such as Invoice Accuracy
4 and Mean Time to Deliver Invoices, both of which are Tier 1 enforcement
5 measurements in the Staff's proposal. An ALEC may get only 2 Invoices
6 per month, one from CRIS and one from CABS. If the enforcement
7 mechanism resulted in a penalty for these measurements, it is very likely
8 the penalty would be trebled, for all ALECs.

9
10 Admittedly, the very nature of these measurements is that they have a low
11 number of transactions. However other sub-metrics in the Ordering,
12 Provisioning, and Maintenance and Repair categories could be expected
13 to have relatively low volumes and, as a result, the Competitive Entry
14 Volume adjustment would apply to many large ALECs, not just the small
15 ALECs for which this adjustment is targeted.

16
17 Q. SHOULD PERIODIC THIRD-PARTY AUDITS OF PERFORMANCE
18 ASSESSMENT PLAN DATA AND REPORTS BE REQUIRED? (ISSUE
19 24.a)

20
21 A. Yes, within reason. BellSouth believes that third-party audits of
22 Performance Assessment Plan data and reports is appropriate and, as
23 such, has included in its SQM as Appendix C, a BellSouth audits policy.

1 This is consistent with the proposal attached as Exhibit PWS-1 to Florida
2 Commission Staff witness Mr. Stallcup in his direct testimony. However
3 BellSouth's measurement data is produced by a regional system and
4 managed by the same regional organization. To the extent possible,
5 audits should be conducted regionally since many of the processes and
6 programs are the same from state to state.

7

8 Q. IF SO, HOW OFTEN SHOULD AUDITS BE CONDUCTED, AND HOW
9 SHOULD THE AUDIT SCOPE BE DETERMINED? (ISSUE 24.b)

10

11 A. As stated in Appendix C of the BellSouth SQM, "if requested by a Public
12 Service Commission or by an ALEC exercising contractual audit rights,
13 BellSouth will agree to undergo a comprehensive audit of the current year
14 aggregate level reports for both BellSouth and the ALEC(s) for each of the
15 next five (5) years (2001-2005), to be conducted by an independent third
16 party". "BellSouth, the PSC and the ALEC(s) shall jointly determine the
17 scope of the audit. This is consistent with the proposal attached as Exhibit
18 PWS-1 to Florida Commission Staff witness Mr. Stallcup in his direct
19 testimony.

20

21 Q. IF PERIODIC THIRD-PARTY AUDITS ARE REQUIRED, WHO SHOULD
22 BE REQUIRED TO PAY THE COST OF THE AUDITS? (ISSUE 25)

23

1 A. As stated in Appendix C of the BellSouth SQM, "the cost shall be borne
2 50% by BellSouth and 50% by the ALEC or ALEC(s). This is consistent
3 with the proposal attached as Exhibit PWS-1 to Florida Commission Staff
4 witness Mr. Stallcup in his direct testimony.

5

6 Q. WHO SHOULD SELECT THE THIRD-PARTY AUDITOR IF A THIRD-
7 PARTY AUDIT IS REQUIRED? (ISSUE 26)

8

9 A. As stated in Appendix C of the BellSouth SQM, "the independent third
10 party auditor shall be selected with input from BellSouth, the PSC, if
11 applicable, and the ALEC(s)". This is consistent with the proposal
12 attached as Exhibit PWS-1 to Florida Commission Staff witness Mr.
13 Stallcup in his direct testimony.

14

15 Q. SHOULD AN ALEC HAVE THE RIGHT TO AUDIT OR REQUEST A
16 REVIEW BY BELL SOUTH FOR ONE OR MORE SELECTED
17 MEASURES WHEN IT HAS REASON TO BELIEVE THE DATA
18 COLLECTED FOR A MEASURE IS FLAWED OR THE REPORT
19 CRITERIA FOR THE MEASURE IS NOT BEING ADHERED TO? (ISSUE
20 27.a)

21

22 A. No. BellSouth provides the ALECs with the raw data underlying many of
23 the BellSouth Service Quality Measurements reports as well as a user

1 manual on how to manipulate the data into reports. The ALECs can use
2 this raw data to validate the results in the BellSouth Service Quality
3 Measurements reports posted every month on the BellSouth web site.
4 This raw data was described in more detail in Issue 3 above.

5
6 Q. IF SO, SHOULD THE AUDIT BE PERFORMED BY AN INDEPENDENT
7 THIRD PARTY? (ISSUE 27.b)

8
9 A. No. As I testified previously, additional audits beyond the yearly
10 comprehensive audit are not necessary. Therefore, the question of who
11 should perform the audit the audit is moot.

12
13 Nevertheless, if the Commission determines that such an audit is
14 necessary, an independent third party should perform the audit. The
15 auditing firm should be selected by the ALEC and BellSouth. If parties
16 cannot agree on the selection of an auditing firm, Staff can select the
17 auditor.

18
19 Q. SHOULD BELLSOUTH BE REQUIRED TO RETAIN PERFORMANCE
20 MEASUREMENT DATA AND SOURCE DATA, AND IF SO, FOR HOW
21 LONG? (ISSUE 28)

1 A. As I testified previously, Exhibit DAC-2 explains the enormous scope of
2 data addressed here that must be maintained by the PMAP system.
3 BellSouth proposes to retain this data for a period not to exceed 18
4 months. The retention of this volume of data longer than 18 months would
5 represent tremendous cost to BellSouth in data storage and, therefore,
6 would be unreasonable and overly burdensome.

7

8 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

9

10 A. Yes

2
1

**Transmittal Cover Sheet for Dave Coon
Direct Exhibit DAC-1**

This exhibit contains the

BellSouth Service Quality Measurement Plan (SQM)

Florida Performance Metrics

Measurement Descriptions
Version 0.01

Issue Date: February 27, 2001

This document consists of 162 pages.

BellSouth Service Quality Measurement Plan (SQM)

Florida Performance Metrics

**Measurement Descriptions
Version 0.01**

Issue Date: February 27, 2001

Introduction

The BellSouth Service Quality Measurement Plan (SQM) describes in detail the measurements produced to evaluate the quality of service delivered to BellSouth's customers both wholesale and retail. The SQM was developed to respond to the requirements of the Communications Act of 1996 Section 251 (96 Act) which required BellSouth to provide non-discriminatory access to Competing Local Providers (CLP)¹ and their Retail Customers. The reports produced by the SQM provide regulators, CLPs and BellSouth the information necessary to monitor the delivery of non-discriminatory access.

This plan results from the many divergent forces evolving from the 96 Act. The 96 Act, the Georgia Public Service Commission (GPSC) Order (Orders of 12/30/97 and 1/12/01 in Docket 7892-U), LCUG 1-7.0, the FCC's NPRM (CC Docket 98-56 RM9101 04/17/98), the Louisiana Public Service Commission (LPSC) Order (Docket U-22252 Subdocket C 04/19/98), numerous arbitration cases, LPSC sponsored collaborative workshops (10/98-02/00), and proceedings in Alabama, Mississippi, and North Carolina have influenced and continue to influence the SQM.

The SQM and the reports flowing from it must change to reflect the dynamic requirements of the industry. New measurements are added as new products, systems, and processes are developed and fielded. New products and services are added as the markets for them develop and the processes stabilize. The measurements are also changed to reflect changes in systems, correct errors, and respond to both 3rd Party audit requirements and regulatory requirements.

This document is intended for use by someone with knowledge of telecommunications industry, information technologies and a functional knowledge of the subject areas covered by the BellSouth Performance Measurements and the reports that flow from them.

Once it is approved, the most current copy of this document can be found on the web at URL: <https://pmap.bellsouth.com> in the Help folder.

1. Alternative Local Exchange Companies (ALEC) and Competing Local Providers (CLP) are referred to as Competing Local Exchange Carriers (CLEC) in this document.

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Section 1: Operations Support Systems (OSS)

OSS-1: Average Response Time and Response Interval (Pre-Ordering/Ordering)

Definition

Average response time and response intervals are the average times and number of requests responded to within certain intervals for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for Telephone numbers (TNs), and Customer Service Records (CSRs).

Exclusions

None

Business Rules

The average response time for retrieving pre-order/order information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month.

The response interval starts when the client application (LENS or TAG for CLECs and RNS or ROS for BellSouth) submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number of accesses to the legacy systems during the reporting period which take less than 2.3 seconds, the number of accesses which take more than 6 seconds, and the number which are less than or equal to 6.3 seconds are also captured.

Calculation

Response Time = (a - b)

- a = Date & Time of Legacy Response
- b = Date & Time of Legacy Request

Average Response Time = c ÷ d

- c = Sum of Response Times
- d = Number of Legacy Requests During the Reporting Period

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • Legacy Contract (per reporting dimension) • Response Interval • Regional Scope 	<ul style="list-style-type: none"> • Report month • Legacy Contract (per reporting dimension) • Response Interval • Regional Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> • RSAG – Address (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system. • RSAG – TN (Regional Street Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system. • ATLAS (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system. • COFFI (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system. • DSAP (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system. • HAL/CRIS (Hands-Off Assignment Logic/Customer Record Information System) – a system used to access the Business Office Customer Record Information System (BOCRIS). It allows BellSouth servers, including LENS, access to legacy systems. CLECs query this legacy system. • P/SIMS (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system. • OASIS (Obtain Available Services Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system. 	<ul style="list-style-type: none"> • Parity + 4 seconds.

OSS-1: Average Response Time and Response Interval (Pre-Ordering/Ordering)

Table 1: Legacy System Access Times For RNS

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤ 6.3 sec.	Avg. Sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
CRIS	CRSACCTS	CSR	x	x	x	x	x
OASIS	OASISBSN	Feature/Service	x	x	x	x	x
OASIS	OASISCAR	Feature/Service	x	x	x	x	x
OASIS	OASISLPC	Feature/Service	x	x	x	x	x
OASIS	OASISMTN	Feature/Service	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 2: Legacy System Access Times For R0S

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
CRIS	CRSOCSR	CSR	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 3: Legacy System Access Times For LENS

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
HAL	HAL/CRIS	CSR	x	x	x	x	x
COFFI	COFFI/USOC	Feature/Service	x	x	x	x	x
P/SIMS	PSIMS/ORB	Feature/Service	x	x	x	x	x

Table 4: Legacy System Access Times For TAG

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
ATLAS	ATLAS-MLH	TN	x	x	x	x	x
ATLAS	ATLAS-DID	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
CRIS	CRSEINIT	CSR	x	x	x	x	x
CRIS	CRSECSR	CSR	x	x	x	x	x

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

Note: CLEC specific data is not available in this measure. Queries of this sort do not have company specific signatures.

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • RSAG – Address (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system. • RSAG – TN (Regional Street Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system. • ATLAS (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system. • COFFI (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system. • DSAP (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system. • HAL/CRIS (Hands-Off Assignment Logic/Customer Record Information System) – a system used to access the Business Office Customer Record Information System (BOCRIS). It allows BellSouth servers, including LENS, access to legacy systems. CLECs query this legacy system. • P/SIMS (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system. • OASIS (Obtain Available Services Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system. 	<ul style="list-style-type: none"> • Percent Response Received within 6.3 seconds: > 95%

OSS-1: Average Response Time and Response Interval (Pre-Ordering/Ordering)

SEEM OSS Legacy Systems

System	BellSouth	CLEC
Telephone Number/Address		
RSAG	RNS, ROS	TAG, LENS
Atlas	RNS, ROS	TAG, LENS
DSAP	RNS, ROS	TAG, LENS
CSR Data		
CRSACCTS	RNS	
CRSOCSR	ROS	
HAL/CRIS		LENS
CRSE INIT		TAG
CRSOCSR		TAG
Service/Feature Availability		
OASISBSN	RNS	
OASISCAR	RNS	
OASISLPC	RNS	

System	BellSouth	CLEC
OASISMTN	RNS	
OASISBIG	RNS, ROS	
COFFI/USOC		LENS
PSIMS/ORB		LENS

OSS-1: Average Response Time and Response Interval (Pre-Ordering/Ordering)

OSS-2: Interface Availability (Pre-Ordering/Ordering)

Definition

Percent of time OSS interface is functionally available compared to scheduled availability. Availability percentages for CLEC interface systems and for all Legacy systems accessed by them are captured. ("Functional Availability" is the amount of time in hours during the reporting period that the legacy systems are available to users. The planned System Scheduled Availability is the time in hours per day that the legacy system is scheduled to be available.)

Scheduled availability is posted on the ICS Operations internet site: (www.interconnection.bellsouth.com/oss/osshour.html)

Exclusions

None

Business Rules

This measurement captures the availability percentages for the BellSouth systems, which are used by CLECs during Pre-Ordering functions. Comparing the percentages to BellSouth results allows conclusions as to whether an equal opportunity exists for the CLEC to deliver a comparable customer experience.

Note: Only full outages are used in the calculation of Application Availability.

A full outage is incurred when any of the following circumstances exist:

- The application or system is down.
- The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
- More than one work center cannot access the application or system for any reason.
- When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.
- When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable.

Calculation

Interface Availability (Pre-Ordering/Ordering) = $(a \div b) \times 100$

- a = Functional Availability
- b = Scheduled Availability

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
Report month <ul style="list-style-type: none"> • Legacy Contract Type (per reporting dimension) • Regional Scope • Hours of Downtime 	Report month <ul style="list-style-type: none"> • Legacy Contract Type (per reporting dimension) • Regional Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> • Regional Level 	<ul style="list-style-type: none"> • $\geq 99.5\%$

OSS Interface Availability

OSS Interface	Applicable to	% Availability
EDI	CLEC	x
HAL	CLEC	x
LENS	CLEC	x
LEO Mainframe	CLEC	x
LEO UNIX	CLEC	x
LESOG	CLEC	x
PSIMS	CLEC	x
TAG	CLEC	x
ATLAS/COFFI	CLEC/BellSouth	x
BOCRIS	CLEC/BellSouth	x
DSAP	CLEC/BellSouth	x
RSAG	CLEC/BellSouth	x
SOCS	CLEC/BellSouth	x
SONGS	CLEC/BellSouth	x
RNS	BellSouth	Under Development
ROS	BellSouth	Under Development

OSS-2: Interface Availability (Pre-Ordering/Ordering)

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Regional Level	• ≥ 99.5%

SEEM OSS Interface Availability

OSS Interface	Applicable to	% Availability
EDI	CLEC	x
HAL	CLEC	x
LENS	CLEC	x
LEO Mainframe	CLEC	x
LEO UNIX	CLEC	x
LESOG	CLEC	x
PSIMS	CLEC	x
TAG	CLEC	x

OSS-2: Interface Availability (Pre-Ordering/Ordering)

OSS-3: Interface Availability (Maintenance & Repair)

Definition

This measures the percentage of time the OSS Interface is functionally available compared to scheduled availability. Availability percentage for the CLEC and BellSouth interface systems and for the legacy systems accessed by them are captured.

Exclusions

None

Business Rules

This measure is designed to compare the OSS availability versus scheduled availability of BellSouth's legacy systems.

Note: Only full outages are used in the calculation of Application Availability. A full outage is incurred when any of the following circumstances exists:

- The application or system is down.
- The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
- More than one work center cannot access the application or system for any reason.
- When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.
- When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable.

Calculation

OSS Interface Availability $(a \div b) \times 100$

- a = Functional Availability
- b = Scheduled Availability

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Availability of CLEC TAFI • Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPDM • ECTA 	<ul style="list-style-type: none"> • Availability of BellSouth TAFI • Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPDM

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Regional Level 	<ul style="list-style-type: none"> • $\geq 99.5\%$

OSS Interface Availability (M&R)

OSS Interface	% Availability
BellSouth TAFI	x
CLEC TAFI	x
CLEC ECTA	x
BellSouth & CLEC	x
CRIS	x
LMOS HOST	x
LNP	x
MARCH	x
OSPCM	x
PREDICTOR	x
SOCS	x

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Regional Level	• ≥ 99.5%

OSS Interface Availability (M&R)

OSS Interface	% Availability
CLEC TAFI	x
CLEC ECTA	x

OSS-4: Response Interval (Maintenance & Repair)

Definition

The response intervals are determined by subtracting the time a request is received on the BellSouth side of the interface from the time the response is received from the legacy system. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.

Exclusions

None

Business Rules

This measure is designed to monitor the time required for the CLEC and BellSouth interface system to obtain from BellSouth's legacy systems the information required to handle maintenance and repair functions. The clock starts on the date and time when the request is received on the BellSouth side of the interface, and the clock stops when the response has been transmitted through that same point to the requester.

Note: The OSS Response Interval BellSouth Total Report is a combination of BellSouth Residence and Business Total.

Calculation

OSS Response Interval = (a - b)

- a = Query Response Date and Time
- b = Query Request Date and Time

Percent Response Interval (per category) = (c ÷ d) X 100

- c = Number of Response Intervals in category "X"
- d = Number of Queries Submitted in the Reporting Period

where, "X" is ≤ 4, > 4 ≤ 10, ≤ 10, > 10, or > 30 seconds.

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• CLEC Transaction Intervals	• BellSouth Business and Residential Transactions Intervals

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• Regional Level	• Parity

Legacy System Access Times for M&R

System	BellSouth & CLEC	Count				
		≤ 4	> 4 ≤ 10	≤ 10	> 10	> 30
CRIS	x	x	x	x	x	x
DLETH	x	x	x	x	x	x
DLR	x	x	x	x	x	x
LMOS	x	x	x	x	x	x
LMOSupd	x	x	x	x	x	x
LNP	x	x	x	x	x	x
MARCH	x	x	x	x	x	x
OSPCM	x	x	x	x	x	x
Predictor	x	x	x	x	x	x
SOCS	x	x	x	x	x	x
NIW	x	x	x	x	x	x

OSS-4: Response Interval (Maintenance & Repair)

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	Not Applicable

PO-1: Loop Makeup - Response Time – Manual

Definition

This report measures the average interval and percent within the interval from the submission of a Manual Loop Makeup Service Inquiry (LMUSI) to the distribution of Loop Makeup information back to the CLEC.

Exclusions

- Inquiries, which are submitted electronically.
- Designated Holidays are excluded from the interval calculation.
- Weekend hours from 5:00PM Friday until 8:00AM Monday are excluded from the interval calculation.
- Canceled Inquiries.

Business Rules

The CLEC Manual Loop Makeup Service Inquiry (LMUSI) process includes inquiries submitted via mail or FAX to BellSouth's Complex Resale Support Group (CRSG).

This measurement combines three intervals:

1. From receipt of the Service Inquiry for Loop Makeup to hand off to the Service Advocacy Center (SAC) for "Look-up."
2. From SAC start date to SAC complete date.
3. From SAC complete date to date the Complex Resale Support Group (CRSG) distributes loop makeup information back to the CLEC.

The "Receive Date" is defined as the date the Manual LMUSI is received by the CRSG. It is counted as day Zero. LMU "Return Date" is defined as the date the LMU information is sent back to the CLEC from BellSouth. The interval calculation is reset to Zero when a CLEC initiated change occurs on the Manual LMU request.

Note: The Loop Make Up Service Inquiry Form does not require the CLEC to furnish the type of Loop. The CLEC determines whether the loop makeup will support the type of service they wish to order or not and qualifies the loop. If the loop makeup will support the service, a firm order LSR is submitted by the CLEC.

Calculation

Response Interval = (a - b)

- a = Date and Time LMUSI returned to CLEC
- b = Date and Time the LMUSI is received

Average Interval = (c ÷ d)

- c = Sum of all Response Intervals
- d = Total Number of LMUSIs received within the reporting period

Percent within interval = (e ÷ f) X 100

- e = Total LMUSIs received within the interval
- f = Total Number of LMUSIs processed within the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
 - State
 - Region
- Interval for manual LMUs:
 - 0 - 1 day
 - >1 - 2 days
 - >2 - 3 days
 - 0 - ≤ 3 days
 - >3 - 6 days

- >6 – 10 days
- > 10 days
- Average Interval in days

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Total Number of Inquiries • SI Intervals • State and Region 	

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Loops 	Benchmark <ul style="list-style-type: none"> • 95% in 3 Business Days

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Loops 	Benchmark <ul style="list-style-type: none"> • 95% in 3 Business Days

PO-2: Loop Make Up - Response Time - Electronic

Definition

This report measures the average interval and the percent within the interval from the electronic submission of a Loop Makeup Service Inquiry (LMUSI) to the distribution of Loop Makeup information back to the CLEC.

Exclusions

- Manually submitted inquiries.
- Designated Holidays are excluded from the interval calculation.
- Canceled Requests.

Business Rules

The response interval starts when the CLEC's Mechanized Loop Makeup Service Inquiry (LMUSI) is submitted electronically through the Operational Support Systems interface, LENS, TAG or RoboTAG. It ends when BellSouth's Loop Facility Assignment and Control System (LFACS) responds electronically to the CLEC with the requested Loop Makeup data via LENS, TAG or RoboTAG Interfaces.

Note: The Loop Make Up Service Inquiry Form does not require the CLEC to furnish the type of Loop. The CLEC determines whether the loop makeup will support the type of service they wish to order or not and qualifies the loop. If the loop makeup will support the service, a firm order LSR is submitted by the CLEC. EDI is not a pre-ordering system, and, therefore, is not applicable in this measure.

Calculation

Response Interval = (a - b)

- a = Date and Time LMUSI returned to CLEC
- b = Date and Time the LMUSI is received

Average Interval = (c ÷ d)

- c = Sum of all response intervals
- d = Total Number of LMUSIs received within the reporting period

Percent within interval = (e ÷ f) X 100

- e = Total LMUSIs received within the interval
- f = Total Number of LMUSIs processed within the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
 - State
 - Region
- Interval for electronic LMUs:
 - 0 – 1 minute
 - >1 – 5 minutes
 - 0 - ≤ 5 minutes
 - > 5 – 8 minutes
 - > 8 – 15 minutes
 - > 15 minutes
- Average Interval in minutes

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Legacy Contract • Response Interval • Regional Scope 	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Loop 	Benchmark <ul style="list-style-type: none"> • 90% in 5 Minutes (Reassess after 6 months - new system)

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Loop 	<ul style="list-style-type: none"> • 90% in 5 Minutes (Reassess after 6 months - new system)

PO-2: Loop Make Up - Response Time - Electronic

Section 2: Ordering

O-1: Acknowledgement Message Timeliness

Definition

This measurement provides the response interval from the time an LSR is electronically submitted via EDI or TAG until an acknowledgement notice is sent by the system.

Exclusions

None

Business Rules

The process includes EDI & TAG system functional acknowledgements for all Local Service Requests (LSRs) which are electronically submitted by the CLEC. The start time is the receipt time of the LSR at BellSouth's side of the interface (gateway). The end time is when the acknowledgement is transmitted by BellSouth at BellSouth's side of the interface (gateway). If more than one CLEC uses the same ordering center, an Acknowledgement Message will be returned to the "Aggregator", however, BellSouth will not be able to determine which specific CLEC this message represented.

Calculation

Response Interval = (a - b)

- a = Date and Time Acknowledgement Notices returned to CLEC
- b = Date and Time LSRs electronically submitted by the CLEC via EDI or TAG respectively

Average Response Interval = (c ÷ d)

- c = Sum of all Response Intervals
- d = Total number of electronically submitted LSRs received, from CLECs via EDI or TAG respectively, in the Reporting Period.

Reporting Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
 - State
 - Region
- Electronically Submitted LSRs
 - 0 – ≤10 minutes
 - > 10 – ≤20 minutes
 - > 20 – ≤30 minutes
 - 0 – ≤ 30 minutes
 - > 30 – ≤45 minutes
 - > 45 – ≤60 minutes
 - > 60 – ≤120 minutes
 - > 120 minutes
- Average interval for electronically submitted LSRs in minutes

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report month • Record of functional acknowledgements 	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • EDI 	<ul style="list-style-type: none"> • EDI – 90% within 30 minutes (6 months – 95% within 30 minutes)
<ul style="list-style-type: none"> • TAG 	<ul style="list-style-type: none"> • TAG – 95% within 30 minutes

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • EDI 	<ul style="list-style-type: none"> • EDI – 90% within 30 minutes (6 months – 95% within 30 minutes)
<ul style="list-style-type: none"> • TAG 	<ul style="list-style-type: none"> • TAG – 95% within 30 minutes

O-2: Acknowledgement Message Completeness

Definition

This measurement provides the percent of LSRs received via EDI or TAG, which are acknowledged electronically.

Exclusions

Manually submitted LSRs

Business Rules

EDI and TAG send Functional Acknowledgements for all LSRs, which are electronically submitted by a CLEC. If more than one CLEC uses the same ordering center, an Acknowledgement Message will be returned to the "Aggregator", however, BellSouth will not be able to determine which specific CLEC this message represented. The Acknowledgement Message is returned prior to the determination of whether the LSR will be partially mechanized or fully mechanized.

Calculation

$$\text{Acknowledgement Completeness} = (a \div b) \times 100$$

- a = Total number of Functional Acknowledgements returned in the reporting period for LSRs electronically submitted by EDI or TAG respectively
- b = Total number of electronically submitted LSRs received in the reporting period by EDI or TAG respectively

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
 - State
 - Region

Note: Acknowledgement message is generated before the system recognizes whether this message (LSR) will be partially or fully mechanized.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report month • Record of functional acknowledgements 	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • EDI • TAG 	<ul style="list-style-type: none"> • Benchmark: 100%

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none">• EDI• TAG	<ul style="list-style-type: none">• Benchmark: 100%

O-2: Acknowledgement Message Completeness

O-3: Percent Flow-Through Service Requests (Summary)

Definition

The percentage of Local Service Requests (LSR) and LNP Local Service Requests (LNP LSRs) submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued, without manual intervention.

Exclusions

- Fatal Rejects
- Auto Clarification
- Manual Fallout
- CLEC System Fallout

Business Rules

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

Definitions:

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

Auto-Clarification: Clarifications that occur due to invalid data within the LSR. LESOG/LAUTO will perform data validity checks to ensure the data within the LSR is correct and valid. For example, if the address on the LSR is not valid according to RSAQ, or if the LNP is not available for the NPA NXXX requested, the CLEC will receive an Auto-Clarification.

Manual Fallout: Planned Fallout that occur by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the LCSC. When a CLEC submits an LSR, LESOG/LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. Following are the categories for Manual Fallout:

- | | |
|---|--|
| 1. Complex* | 8. Denials-restore and conversion, or disconnect and conversion orders |
| 2. Special pricing plans | 9. Class of service invalid in certain states with some types of service |
| 3. Some Partial migrations | 10. Low volume such as activity type "T" (move) |
| 4. New telephone number not yet posted to BOCRIS | 11. More than 25 business lines, or more than 15 loops |
| 5. Pending order review required | 12. Transfer of calls option for the CLEC end users |
| 6. CSR inaccuracies such as invalid or missing CSR data in CRIS | 13. Directory Listings (Indentions and Captions) |
| 7. Expedites (requested by the CLEC) | |

* See "LSR Flow-Through Matrix" on page 15. for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through.

Total System Fallout: Errors that require manual review by the LSCS to determine if the error is caused by the CLEC, or is due to BellSouth system functionality. If it is determined the error is caused by the CLEC, the LSR will be sent back to the CLEC for clarification. If it is determined the error is BellSouth caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

Z Status: LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR.

Calculation

Percent Flow Through = $a \div [b - (c + d + e + f)] \times 100$

- a = The total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued
- b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
- c = the number of LSRs that fall out for manual processing
- d = the number of LSRs that are returned to the CLEC for clarification
- e = the number of LSRs that contain errors made by CLECs
- f = the number of LSRs that receive a Z status.

Percent Achieved Flow Through = $a \div [b - (c + d + e)] \times 100$

- a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued.
- b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
- c = the number of LSRs that are returned to the CLEC for clarification
- d = the number of LSRs that contain errors made by CLECs
- e = the number of LSRs that receive Z status

Report Structure

- CLEC Aggregate
 - Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance:
<ul style="list-style-type: none"> • Report month • Total number of LSRs received, by interface, by CLEC <ul style="list-style-type: none"> - TAG - EDI - LENS • Total number of errors by type, by CLEC <ul style="list-style-type: none"> - Fatal rejects - Auto clarification - CLEC caused system fallout • Total number of errors by error code • Total fallout for manual processing 	<ul style="list-style-type: none"> • Report month • Total number of errors by type <ul style="list-style-type: none"> - BellSouth system error

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark ^a
• Residence	• Benchmark: 95%
• Business	• Benchmark: 90%
• UNE	• Benchmark: 85%
• LNP	• Benchmark: 85%

a. Benchmarks do not apply to the "Percent Achieved Flow Through."

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark^a
• Residence	• Benchmark: 95%
• Business	• Benchmark: 90%
• UNE	• Benchmark: 85%
• LNP	• Benchmark: 85%

a. Benchmarks do not apply to the "Percent Achieved Flow Through."

O-4: Percent Flow-Through Service Requests (Detail)

Definition

A detailed list, by CLEC, of the percentage of Local Service Requests (LSR) and LNP Local Service Requests (LNP LSRs) submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued, without manual or human intervention.

Exclusions

- Fatal Rejects
- Auto Clarification
- Manual Fallout
- CLEC System Fallout

Business Rules

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

Definitions:

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

Auto-Clarification: Clarifications that occur due to invalid data within the LSR. LESOG/LAUTO will perform data validity checks to ensure the data within the LSR is correct and valid. For example, if the address on the LSR is not valid according to RSAG, or if the LNP is not available for the NPA NXXX requested, the CLEC will receive an Auto-Clarification.

Manual Fallout: Planned Fallout that occur by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the LCSC. When a CLEC submits an LSR, LESOG/LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. Following are the categories for Manual Fallout:

1. Complex*
2. Special pricing plans
3. Some Partial migrations
4. New telephone number not yet posted to BOCRIS
5. Pending order review required
6. CSR inaccuracies such as invalid or missing CSR data in CRIS
7. Expedites (requested by the CLEC)
8. Denials-restore and conversion, or disconnect and conversion orders
9. Class of service invalid in certain states with some types of service
10. Low volume such as activity type "T" (move)
11. More than 25 business lines, or more than 15 loops
12. Transfer of calls option for the CLEC end users
13. Directory Listings (Intentions and Captions)

* See "LSR Flow-Through Matrix" on page 15, for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through.

Total System Fallout: Errors that require manual review by the LCSC to determine if the error is caused by the CLEC, or is due to BellSouth system functionality. If it is determined the error is caused by the CLEC, the LSR will be sent back to the CLEC for clarification. If it is determined the error is BellSouth caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

Z Status: LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR.

Calculation

$$\text{Percent Flow Through} = a \div [b - (c + d + e + f)] \times 100$$

- a = The total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued
- b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
- c = the number of LSRs that fall out for manual processing
- d = the number of LSRs that are returned to the CLEC for clarification
- e = the number of LSRs that contain errors made by CLECs
- f = the number of LSRs that receive a Z status.

$$\text{Percent Achieved Flow Through} = a \div [b - (c + d + e)] \times 100$$

- a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued.
- b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
- c = the number of LSRs that are returned to the CLEC for clarification
- d = the number of LSRs that contain errors made by CLECs
- e = the number of LSRs that receive Z status

Report Structure

Provides the flow through percentage for each CLEC (by alias designation) submitting LSRs through the CLEC mechanized ordering process. The report provides the following:

- CLEC (by alias designation)
- Number of fatal rejects
- Mechanized interface used
- Total mechanized LSRs
- Total manual fallout
- Number of auto clarifications returned to CLEC
- Number of validated LSRs
- Number of BellSouth caused fallout
- Number of CLEC caused fallout
- Number of Service Orders Issued
- Base calculation
- CLEC error excluded calculation

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • Total number of LSRs received, by interface, by CLEC <ul style="list-style-type: none"> - TAG - EDI - LENS • Total number of errors by type, by CLEC <ul style="list-style-type: none"> - Fatal rejects - Auto clarification - CLEC errors • Total number of errors by error code • Total fallout for manual processing 	<ul style="list-style-type: none"> • Report month • Total number of errors by type <ul style="list-style-type: none"> - BellSouth system error

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark ^a
<ul style="list-style-type: none"> • Residence 	<ul style="list-style-type: none"> • Benchmark: 95%
<ul style="list-style-type: none"> • Business 	<ul style="list-style-type: none"> • Benchmark: 90%

SQM Level of Disaggregation	Retail Analog/Benchmark ^a
• UNE	• Benchmark: 85%
• LNP	• Benchmark: 85%

a. Benchmarks do not apply to the "Percent Achieved Flow Through."

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-5: Flow-Through Error Analysis

Definition

An analysis of each error type (by error code) that was experienced by the LSRs that did not flow through or reached a status for a FOC to be issued.

Exclusions

Each Error Analysis is error code specific, therefore exclusions are not applicable.

Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued. The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example, fax and courier).

Calculation

Total for each error type.

Report Structure

Provides an analysis of each error type (by error code). The report is in descending order by count of each error code and provides the following:

- Error Type (by error code)
- Count of each error type
- Percent of each error type
- Cumulative percent
- Error Description
- CLEC Caused Count of each error code
- Percent of aggregate by CLEC caused count
- Percent of CLEC caused count
- BellSouth Caused Count of each error code
- Percent of aggregate by BellSouth caused count
- Percent of BellSouth by BellSouth caused count.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • Total number of LSRs received • Total number of errors by type (by error code) <ul style="list-style-type: none"> - CLEC caused error 	<ul style="list-style-type: none"> • Report month • Total number of errors by type (by error code) <ul style="list-style-type: none"> - BellSouth system error

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • NA 	<ul style="list-style-type: none"> • NA

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-5: Flow-Through Error Analysis

O-6: CLEC LSR Information

Definition

A list with the flow through activity of LSRs by CC, PON and Ver, issued by each CLEC during the report period.

Exclusions

- Fatal Rejects
- LSRs submitted manually

Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued. The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example, fax and courier).

Calculation

NA

Report Structure

Provides a list with the flow through activity of LSRs by CC, PON and Ver, issued by each CLEC during the report period with an explanation of the of the columns and content. This report is available on a CLEC specific basis. The report provides the following for each LSR.

- CC
- PON
- Ver
- Timestamp
- Type
- Err #
- Note or Error Description

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report month • Record of LSRs received by CC, PON and Ver • Record of Timestamp, Type, Err # and Note or Error Description for each LSR by CC, PON and Ver 	NA

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• NA	• NA

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Table 1: LSR Flow-Through Matrix

Product	FT ³	Complex Service ⁴	Complex Order	Planned Fallout For Manual Handling ¹	Edi	Tag ²	Lens	Comments
2 wire analog DID trunk port	No	UNE	Yes	NA	N	N	N	
2 wire analog port	Yes	UNE	No	No	Y	Y	N	
2 wire ISDN digital line side port	No	UNE	Yes	NA	N	N	N	
2 wire ISDN digital loop	Yes	UNE	Yes	No	Y	Y	N	
3 Way Calling	Yes	No	No	No	Y	Y	Y	
4 wire analog voice grade loop	Yes	UNE	Yes	No	Y	Y	N	
4 wire DS0 & PRI digital loop	No	UNE	Yes	NA	N	N	N	
4 wire DS1 & PRI digital loop	No	UNE	Yes	NA	N	N	N	
4 wire ISDN DSI digital trunk ports	No	UNE	Yes	NA	N	N	N	
Accupulse	No	Yes	Yes	NA	N	N	N	
ADSL	Yes	UNE	No	No	Y	Y	N	
Area Plus	Yes	No	No	No	Y	Y	Y	
Basic Rate ISDN	No	Yes	Yes	Yes	Y	Y	N	
Call Block	Yes	No	No	No	Y	Y	Y	
Call Forwarding-Variable	Yes	No	No	No	Y	Y	Y	
Call Return	Yes	No	No	No	Y	Y	Y	
Call Selector	Yes	No	No	No	Y	Y	Y	
Call Tracing	Yes	No	No	No	Y	Y	Y	
Call Waiting	Yes	No	No	No	Y	Y	Y	
Call Waiting Deluxe	Yes	No	No	No	Y	Y	Y	
Caller ID	Yes	No	No	No	Y	Y	Y	
CENTREX	No	Yes	Yes	NA	N	N	N	

Table 1: LSR Flow-Through Matrix

Product	FT ³	Complex Service ⁴	Complex Order	Planned Fallout For Manual Handling ¹	Edi	Tag ²	Lens	Comments
DID WITH PBX ACT W	No	Yes	Yes	Yes	Y	N	Y	
DID ACT W	No	Yes	Yes	Yes	Y	N	Y	
Digital Data Transport	No	UNE	Yes	NA	N	N	N	
Directory Listing Indentions	No	No	No	Yes	Y	Y	Y	
Directory Listings Captions	No	No	Yes	Yes	Y	Y	Y	
Directory Listings (simple)	Yes	No	No	No	Y	Y	Y	
DS3	No	UNE	Yes	NA	N	N	N	
DS1 Loop	Yes	UNE	Yes	No	Y	Y	N	
DSO Loop	Yes	UNE	Yes	No	Y	Y	N	
Enhanced Caller ID	Yes	No	No	No	Y	Y	Y	
ESSX	No	Yes	Yes	NA	N	N	N	
Flat Rate/Business	Yes	No	No	No	Y	Y	Y	
Flat Rate/Residence	Yes	No	No	No	Y	Y	Y	
FLEXSERV	No	Yes	Yes	NA	N	N	N	
Frame Relay	No	Yes	Yes	NA	N	N	N	
FX	No	Yes	Yes	NA	N	N	N	
Ga. Community Calling	Yes	No	No	No	Y	Y	Y	
HDSL	Yes	UNE	No	No	Y	Y	N	
Hunting MLH	No	C/S	C/S	Yes	Y	Y	N	
Hunting Series Completion	No	C/S	C/S	No	Y	Y	Y	
INP to LNP Conversions	No	UNE	Yes	Yes	Y	Y	N	
LightGate	No	Yes	Yes	NA	N	N	N	

Table 1: LSR Flow-Through Matrix

Product	F/T ³	Complex Service ⁴	Complex Order	Planned Fallout For Manual Handling ¹	Edi	Tag ²	Lens	Comments
Local Number Portability	Yes	UNE	Yes	No	Y	Y	N	
LNP with Complex Listing	No	UNE	Yes	Yes	Y	Y	N	
LNP with Partial Migration	No	UNE	Yes	Yes	Y	Y	N	
LNP with Complex Services	No	UNE	Yes	Yes	Y	Y	N	
Loop+INP	Yes	UNE	No	No	Y	Y	N	
Loop+LNP	Yes	UNE	No	No	Y	Y	N	
Measured Rate/Bus.	Yes	No	No	No	Y	Y	Y	
Measured Rate/Res.	Yes	No	No	No	Y	Y	Y	
Megalink	No	Yes	Yes	NA	N	N	N	
Megalink-T1	No	Yes	Yes	NA	N	N	N	
Memory Call	Yes	No	No	No	Y	Y	Y	
Memory Call Ans. Svc.	Yes	No	No	No	Y	Y	Y	
Multiserv	No	Yes	Yes	NA	N	N	N	
Native Mode LAN Interconnection (NMLI)	No	Yes	Yes	NA	N	N	N	
Off-Prem Stations	No	Yes	Yes	NA	N	N	N	
Optional Calling Plan	Yes	No	No	No	Y	Y	Y	
Package/Complete Choice and area plus	Yes	No	No	No	Y	Y	Y	
Pathlink Primary Rate ISDN	No	Yes	Yes	NA	N	N	N	
Pay Phone Provider	No	No	No	NA	N	N	N	
PBX Standalone ACT A,C, D	No	Yes	Yes	Yes	Y	Y	N	
PBX Trunks	No	Yes	Yes	Yes	Y	Y	N	

Table 1: LSR Flow-Through Matrix

Product	FT ³	Complex Service ⁴	Complex Order	Planned Fallout For Manual Handling ¹	Edi	Tag ²	Lens	Comments
Port/Loop Combo	Yes	UNE	No	No	Y	Y	Y	
Port/Loop PBX	No	No	No	Yes	Y	Y	N	
Preferred Call Forward	Yes	No	No	No	Y	Y	Y	
RCF Basic	Yes	No	No	No	Y	Y	Y	
Remote Access to CF	Yes	No	No	No	Y	Y	Y	
Repeat Dialing	Yes	No	No	No	Y	Y	Y	
Ringmaster	Yes	No	No	No	Y	Y	Y	
Smartpath	No	Yes	Yes	NA	N	N	N	
SmartRING	No	Yes	Yes	NA	N	N	N	
Speed Calling	Yes	No	No	No	Y	Y	Y	
Synchronet	No	Yes	Yes	Yes	Y	Y	N	
Tie Lines	No	Yes	Yes	NA	N	N	N	
Touchtone	Yes	No	No	No	Y	Y	Y	
Unbundled Loop-Analog 2W, SL1, SL2	Yes	UNE	No	No	Y	Y	Y	
WATS	No	Yes	Yes	NA	N	N	N	
xDSL Extended LOOP	No	UNE	Yes	NA	N	N	N	

Note¹: Planned Fallout for Manual Handling denotes those services that are electronically submitted and are not intended to flow through due to the complexity of the service.

Note²: The TAG column includes those LSRs submitted via Robo TAG.

Note³: For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: Expedites from CLECs, special pricing plans, denials – restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS – e.g. government, or cannot be changed when changing main TN on C activity, low volume – e.g. activity type T=move, pending order review required, more than 25 business lines, CSR inaccuracies such as invalid or missing CSR data in CRIS, Directory listing indentions and captions, transfer of calls option for CLEC end user – new TN not yet posted to BOCRIS. Many are unique to the CLEC environment.

Note⁴: Services with C/S in the Complex Service and/or the Complex Order columns can be either complex or simple.

O-7: Percent Rejected Service Requests

Definition

Percent Rejected Service Request is the percent of total Local Service Requests (LSRs) received which are rejected due to error or omission. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete.

Exclusions

Service Requests canceled by the CLEC prior to being rejected/clarified.

Business Rules

Fully Mechanized: An LSR is considered “rejected” when it is submitted electronically but does not pass LEO edit checks in the ordering systems (EDI, LENS, TAG, LEO, LESOG) and is returned to the CLEC without manual intervention. There are two types of “Rejects” in the Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR but required fields are either not populated or incorrectly populated and the request is returned to the CLEC before it is considered a valid LSR.

An **Auto Clarification** occurs when a valid LSR is electronically submitted but rejected from LESOG because it does not pass further edit checks for order accuracy.

Partially Mechanized: A valid LSR, which is electronically submitted (via EDI, LENS, TAG) but cannot be processed electronically and “falls out” for manual handling. It is then put into “clarification” and sent back (rejected) to the CLEC.

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized LSRs electronically submitted by the CLEC.

Non-Mechanized: LSRs which are faxed or mailed to the LCSC for processing and “clarified” (rejected) back to the CLEC by the BellSouth service representative.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

Calculation

Percent Rejected Service Requests = $(a \div b) \times 100$

- a = Total Number of Rejected Service Requests in the reporting period
- b = Total Number of Service Requests Received in the reporting period

Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
 - State
 - Region
- Product Specific percent Rejected
- Total percent Rejected

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • Total number of LSRs • Total number of Rejects • State and Region • Total Number of ASRs (Trunks) 	

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
Mechanized, Partially Mechanized and Non-Mechanized <ul style="list-style-type: none"> • Resale - Residence • Resale - Business • Resale – Design (Special) • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop + Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport • Local Interconnection Trunks 	<ul style="list-style-type: none"> • Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

O-7: Percent Rejected Service Requests

O-8: Reject Interval

Definition

Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete.

Exclusions

- Service Requests canceled by CLEC prior to being rejected/clarified.
- Designated Holidays are excluded from the interval calculation.
- LSRs which are identified and classified as “Projects”
- The following hours for Partially mechanized and Non-mechanized LSRs are excluded from the interval calculation:

Residence Resale Group – Monday through Saturday 7:00PM until 7:00AM
From 7:00 PM Saturday until 7:00 AM Monday

Business Resale, Complex, UNE Groups – Monday through Friday 6:00PM until 8:00AM
From 6:00 PM Friday until 8:00 AM Monday.

The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

Business Rules

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in EDI, TAG or LENS). Auto Clarifications are considered in the Fully Mechanized category.

Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via LENS, EDI, or TAG

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized LSRs which are electronically submitted by the CLEC.

Non-Mechanized: The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via LON.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

Calculation

Reject Interval = (a - b)

- a = Date and Time of Service Request Rejection
- b = Date and Time of Service Request Receipt

Average Reject Interval = (c ÷ d)

- c = Sum of all Reject Intervals
- d = Number of Service Requests Rejected in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- Geographic Scope

- State
- Region
- Mechanized:
 - 0 - ≤ 4 minutes
 - > 4 - ≤ 8 minutes
 - > 8 - ≤ 12 minutes
 - > 12 - ≤ 60 minutes
 - 0 - ≤ 1 hour
 - > 1 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 12 hours
 - > 12 - ≤ 16 hours
 - > 16 - ≤ 20 hours
 - > 20 - ≤ 24 hours
 - > 24 hours
- Partially Mechanized:
 - 0 - ≤ 1 hour
 - > 1 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 10 hours
 - 0 - ≤ 10 hours
 - > 10 - ≤ 18 hours
 - 0 - ≤ 18 hours
 - > 18 - ≤ 24 hours
 - > 24 hours
- Non-mechanized:
 - 0 - ≤ 1 hour
 - > 1 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 12 hours
 - > 12 - ≤ 16 hours
 - > 16 - ≤ 20 hours
 - > 20 - ≤ 24 hours
 - 0 - ≤ 24 hours
 - > 24 hours
- Trunks:
 - ≤ 4 days
 - > 4 - ≤ 8 days
 - > 8 - ≤ 12 days
 - > 12 - ≤ 14 days
 - > 14 - ≤ 20 days
 - > 20 days
- Average Interval for mechanized reports in hours, non-mechanized and Trunk reports in days.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
Report month <ul style="list-style-type: none"> • Reject Interval • Total Number of LSRs • Total number of Rejects • State and Region • Total Number of ASRs (Trunks) 	

SQM Disaggregation - Analog/Benchmark

O-8: Reject Interval

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Resale – Residence • Resale – Business • Resale – Design (Special) • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop + Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport 	<ul style="list-style-type: none"> • Mechanized: <ul style="list-style-type: none"> - 97% within 1 Hour • Partially Mechanized: <ul style="list-style-type: none"> - 85% within 18 Hours in 3 Months - 85% within 10 Hours in 6 Months • Non-Mechanized: - 85% within 24 Hours
<ul style="list-style-type: none"> • Local Interconnection Trunks 	<ul style="list-style-type: none"> • Trunks: 85% within 4 Days

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Fully Mechanized - 	<ul style="list-style-type: none"> • 97% ≤ 1 hour

O-9: Firm Order Confirmation Timeliness

Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of valid LSR to distribution of a Firm Order Confirmation.

Exclusions

- Service Requests canceled by CLEC prior to being rejected/clarified.
- Designated Holidays are excluded from the interval calculation.
- LSRs which are identified and classified as “Projects” (under development)
- The following hours for Partially mechanized and Non-mechanized LSRs are excluded from the interval calculation:

Residence Resale Group – Monday through Saturday 7:00PM until 7:00AM
From 7:00 PM Saturday until 7:00 AM Monday

Business Resale, Complex, UNE Groups – Monday through Friday 6:00PM until 8:00AM
From 6:00 PM Friday until 8:00 AM Monday.

The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

Business Rules

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI, LENS or TAG.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS, or TAG) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via EDI, LENS, or TAG.
- **Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized LSRs which are electronically submitted by the CLEC.
- **Non-Mechanized:** The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON.
- **Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

Calculation

Firm Order Confirmation Time = (a - b)

- a = Date and Time of Firm Order Confirmation
- b = Date and Time of Service Request Receipt

Firm Order Confirmation Timeliness = (c ÷ d)

- c = Sum of all Firm Order Confirmation Times
- d = Number of Service Requests Confirmed in Reporting Period

Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
 - CLEC Specific
 - CLEC Aggregate
- Geographic Scope

- State
- Region
- Fully Mechanized:
 - 0 - ≤ 15 minutes
 - > 15 - ≤ 30 minutes
 - > 30 - ≤ 45 minutes
 - > 45 - ≤ 60 minutes
 - > 60 - ≤ 90 minutes
 - > 90 - ≤ 120 minutes
 - > 120 - ≤ 180 minutes
 - 0 - ≤ 3 hours
 - > 3 - ≤ 6 hours
 - > 6 - ≤ 12 hours
 - > 12 - ≤ 24 hours
 - > 24 - ≤ 48 hours
 - > 48 hours
- Partially Mechanized:
 - 0 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 10 hours
 - 0 - ≤ 10 hours
 - > 10 - ≤ 18 hours
 - 0 - ≤ 18 hours
 - > 18 - ≤ 24 hours
 - > 24 - ≤ 48 hours
 - > 48 hours
- Non-mechanized:
 - 0 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 12 hours
 - > 12 - ≤ 16 hours
 - > 16 - ≤ 20 hours
 - > 20 - ≤ 24 hours
 - > 24 - ≤ 36 hours
 - 0 - ≤ 36 hours
 - > 36 - ≤ 48 hours
 - > 48 hours
- Trunks:
 - 0 - ≤ 5 days
 - > 5 - ≤ 10 days
 - 0 - ≤ 10 days
 - > 10 - ≤ 15 days
 - > 15 - ≤ 20 days
 - > 20 days
- Average Interval in Days

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • Interval for FOC • Total number of LSRs • State and Region • Total Number of ASRs (Trunks) 	

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Resale – Residence • Resale – Business • Resale – Design (Special) • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop + Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport 	<ul style="list-style-type: none"> • Mechanized: - 95% within 3 Hours • Partially Mechanized: <ul style="list-style-type: none"> - 85% within 18 Hours in 3 Months - 85% within 10 Hours in 6 Months • Non-Mechanized: 85% within 36 hours
<ul style="list-style-type: none"> • Local Interconnection Trunks 	<ul style="list-style-type: none"> • Trunks: - 95% within 10 days

O-9: Firm Order Confirmation Timeliness

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Fully Mechanized	• 95% within 3 hours
• Partially Mechanized	<ul style="list-style-type: none"> • 85% within 18 Hours in 3 Months • 85% within 10 Hours in 6 Months
• Non-Mechanized	• 85% within 36 hours
• IC Trunks	• 95% within 10 days

O-10: Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual¹

Definition

This report measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC).

Exclusions

- Designated Holidays are excluded from the interval calculation.
- Weekend hours from 5:00PM Friday until 8:00AM Monday are excluded from the interval calculation of the Service Inquiry.
- Canceled Requests
- Electronically Submitted Requests

Business Rules

This measurement combines four intervals:

1. From receipt of Service Inquiry with LSR to hand off to the Service Advocacy Center (SAC) for Loop 'Look-up'.
2. From SAC start date to SAC complete date.
3. From SAC complete date to the Complex Resale Support Group (CRSG) complete date with hand off to LCSC.
4. From receipt of SI/LSR in the LCSC to Firm Order Confirmation.

Calculation

FOC Timeliness Interval = (a - b)

- a = Date and Time Firm Order Confirmation (FOC) for SI with LSR returned to CLEC
- b = Date and Time SI with LSR received

Average Interval = (c ÷ d)

- c = Sum of all FOC Timeliness Intervals
- d = Total number of SIs with LSRs received in the reporting period

Percent Within Interval = (e ÷ f) X 100

- e = Total number of Service Inquiries with LSRs received by the CRSG to distribution of FOC by the Local Carrier Service Center (LCSC)
- f = Total number of Service Inquiries with LSRs received in the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
 - State
 - Region
- Intervals
 - 0 – ≤ 3 days
 - > 3 – ≤ 5 days
 - 0 – ≤ 5 days
 - > 5 – ≤ 7 days
 - > 7 – ≤ 10 days
 - > 10 – ≤ 15 days
 - > 15 days
- Average Interval measured in days

1. See O-9 for FOC Timeliness

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Total Number of Requests • SI Intervals • State and Region 	

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • xDSL (includes UNE unbundled ADSL, HDSL and UNE Unbundled Copper Loops) • Unbundled Interoffice Transport 	<ul style="list-style-type: none"> • 95% Returned within 5 Business days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

O-11: Firm Order Confirmation and Reject Response Completeness

Definition

A response is expected from BellSouth for every Local Service Request transaction (version). More than one response or differing responses per transaction is not expected. Firm Order Confirmation and Reject Response Completeness is the corresponding number of Local Service Requests received to the combination of Firm Order Confirmation and Reject Responses.

Exclusions

- Service Requests canceled by the CLEC prior to FOC or Rejected/Clarified.
- Non-Mechanized LSRs

Business Rules

Mechanized – The number of FOCs or Auto Clarifications sent to the CLEC from LENS, EDI, TAG in response to electronically submitted LSRs (date and time stamp in LENS, EDI, TAG).

Partially Mechanized – The number of FOCs or Rejects sent to the CLEC from LENS, EDI, TAG in response to electronically submitted LSRs (date and time stamp in LENS, EDI, TAG), which fall out for manual handling by the LCSC personnel.

Total Mechanized – The number of the combination of Fully Mechanized and Partially Mechanized LSRs

Note: Manual (Non-Mechanized) LSRs have no version control by the very nature of the manual process, therefore, non-mechanized LSRs are not captured by this report.

For CLEC Results:

Firm Order Confirmation and Reject Response Completeness is determined in two dimensions:

Percent responses is determined by computing the number of Firm Order Confirmations and Rejects transmitted by BellSouth and dividing by the number of Local Service Requests (all versions) received in the reporting period.

Percent of multiple responses is determined by computing the number of Local Service Request unique versions receiving more than one Firm Order Confirmation, Reject or the combination of the two and dividing by the number of Local Service Requests (all versions) received in the reporting period.

Calculation

Single FOC/Reject Response Expected

Firm Order Confirmation / Reject Response Completeness = $(a - b) \times 100$

- a = Total Number of Service Requests for which a Firm Order Confirmation or Reject is Sent
- b = Total Number of Service Requests Received in the Report Period

Multiple or Differing FOC / Reject Responses Not Expected

Response Completeness = $[(a + b) \div c] \times 100$

- a = Total Number of Firm Order Confirmations Per LSR Version
- b = Total Number of Reject Responses Per LSR Version
- c = Total Number of Service Requests (All Versions) Received in the Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized

- State and Region
- CLEC Specific
- CLEC Aggregate
- BellSouth Specific

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
Report month • Reject interval • Total number of LSRs • Total number of rejects • Total number of ASRs (Trunks)	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Resale Residence • Resale Business • Resale Design • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non – Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop and Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport • Local Interconnection Trunks 	<ul style="list-style-type: none"> • 95% Returned

O-11: Firm Order Confirmation and Reject Response Completeness
SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Fully Mechanized 	<ul style="list-style-type: none"> • 95% Returned

O-12: Speed of Answer in Ordering Center

Definition

Measures the average time a customer is in queue.

Exclusions

None

Business Rules

The clock starts when the appropriate option is selected (i.e., 1 for Resale Consumer, 2 for Resale Multiline, and 3 for UNE-LNP, etc.) and the call enters the queue for that particular group in the LCSC. The clock stops when a BellSouth service representative in the LCSC answers the call. The speed of answer is determined by measuring and accumulating the elapsed time from the entry of a CLEC call into the BellSouth automatic call distributor (ACD) until a service representative in BellSouth's Local Carrier Service Center (LCSC) answers the CLEC call.

Calculation

Speed of Answer in Ordering Center = $(a \div b)$

- a = Total seconds in queue
- b = Total number of calls answered in the Reporting Period

Report Structure

Aggregate

- CLEC – Local Carrier Service Center
- BellSouth
 - Business Service Center
 - Residence Service Center

Note: Combination of Residence Service Center and Business Service Center data under development

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Mechanized tracking through LCSC Automatic Call Distributor 	<ul style="list-style-type: none"> • Mechanized tracking through BellSouth Retail center support system.

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
Aggregate <ul style="list-style-type: none"> • CLEC – Local Carrier Service Center • BellSouth <ul style="list-style-type: none"> - Business Service Center - Residence Service Center 	<ul style="list-style-type: none"> • Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-12: Speed of Answer in Ordering Center

O-13: LNP-Percent Rejected Service Requests

Definition

Percent Rejected Service Request is the percent of total Local Service Requests (LSRs) which are rejected due to error or omission. An LSR is considered valid when it is electronically submitted by the CLEC and passes LNP Gateway edit checks to insure the data received is correctly formatted and complete, i.e., fatal rejects are excluded.

Exclusions

- Service Requests canceled by the CLEC
- Fatal Rejects
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.

Business Rules

An LSR is considered “rejected” when it is submitted electronically but does not pass edit checks in the ordering systems (EDI, TAG, LNP Gateway, LAUTO) and is returned to the CLEC without manual intervention.

Fully Mechanized: There are two types of “Rejects” in the Fully Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR (via EDI or TAG) but required fields are not populated correctly and the request is returned to the CLEC.

Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs.

An **Auto Clarification** is a valid LSR which is electronically submitted (via EDI or TAG), but is rejected from LAUTO because it does not pass further edit checks for order accuracy. Auto Clarifications are returned without manual intervention.

Partially Mechanized: A valid LSR which is electronically submitted (via EDI or TAG), but cannot be processed electronically due to a CLEC error and “falls out” for manual handling. It is then put into “clarification”, and sent back (rejected) to the CLEC.

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized rejects.

Non-Mechanized: A valid LSR which is faxed or mailed to the BellSouth LCSC.

Calculation

$$\text{LNP-Percent Rejected Service Requests} = (a \div b) \times 100$$

- a = Number of Service Requests Rejected in the Reporting Period
- b = Number of Service Requests Received in the Reporting Period

Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Not Applicable	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • LNP • UNE Loop w/LNP 	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	Not Applicable

O-13: LNP-Percent Rejected Service Requests

O-14: LNP-Reject Interval Distribution & Average Reject Interval

Definition

Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is electronically submitted by the CLEC and passes LNP Gateway edit checks to insure the data received is correctly formatted and complete, i.e., fatal rejects are excluded.

Exclusions

- Service Requests canceled by the CLEC
- Fatal Rejects
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.

Business Rules

The Reject interval is determined for each rejected LSR processed during the reporting period. The Reject interval is the elapsed time from when BellSouth receives LSR until that LSR is rejected back to the CLEC. Elapsed time for each LSR is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of rejected LSRs to produce the reject interval distribution.

An LSR is considered “rejected” when it is submitted electronically but does not pass edit checks in the ordering systems (EDI, TAG, LNP Gateway, LAUTO) and is returned to the CLEC without manual intervention.

Fully Mechanized: There are two types of “Rejects” in the Fully Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR but required fields are not populated correctly and the request is returned to the CLEC.

Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs.

An **Auto Clarification** is a valid LSR which is electronically submitted (via EDI or TAG), but is rejected from LAUTO because it does not pass further edit checks for order accuracy. Auto Clarifications are returned without manual intervention.

Partially Mechanized: A valid LSR which electronically submitted (via EDI or TAG), but cannot be processed electronically due to a CLEC error and “falls out” for manual handling. It is then put into “clarification”, and sent back to the CLEC.

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized rejects.

Non-Mechanized: A valid LSR which is faxed or mailed to the BellSouth LCSC.

Calculation

Reject Interval = (a - b)

- a = Date & Time of Service Request Rejection
- b = Date & Time of Service Request Receipt

Average Reject Interval = (c ÷ d)

- c = Sum of all Reject Intervals
- d = Total Number of Service Requests Rejected in Reporting Period

Reject Interval Distribution = (e ÷ f) X 100

- e = Service Requests Rejected in reported interval
- f = Total Number of Service Requests Rejected in Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized

- CLEC Specific
- CLEC Aggregate
- State, Region

- Fully Mechanized:
 - 0 - ≤ 4 minutes
 - > 4 - ≤ 8 minutes
 - > 8 - ≤ 12 minutes
 - > 12 - ≤ 60 minutes
 - 0 - ≤ 1 hour
 - > 1 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 12 hours
 - > 12 - ≤ 16 hours
 - > 16 - ≤ 20 hours
 - > 20 - ≤ 24 hours
 - > 24 hours
- Partially Mechanized:
 - 0 - ≤ 1 hour
 - > 1 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 10 hours
 - 0 - ≤ 10 hours
 - > 10 - ≤ 18 hours
 - 0 - ≤ 18 hours
 - > 18 - ≤ 24 hours
 - > 24 hours
- Non-Mechanized:
 - 0 - ≤ 1 hour
 - > 1 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 12 hours
 - > 12 - ≤ 16 hours
 - > 16 - ≤ 20 hours
 - > 20 - ≤ 24 hours
 - 0 - ≤ 24 hours
 - > 24 hours
- Average Interval in Days

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
Under Development	

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • LNP • UNE Loop with LNP 	<ul style="list-style-type: none"> • Mechanized: 97% within 1Hour • Partially Mechanized: 85% within 18 Hours • Non-Mechanized: 85% within 24 Hours

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-14: LNP-Reject Interval Distribution & Average Reject Interval

O-15: LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval

Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of a valid LSR to distribution of a firm order confirmation.

Exclusions

- Rejected LSRs (Clarifications or Fatal Rejects)
- Order Activities of BellSouth or the CLEC associated with interval or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.

Business Rules

The Firm Order Confirmation interval is determined for each confirmed LSR processed during the reporting period. The Firm Order Confirmation interval is the elapsed time from when BellSouth receives an LSR until that LSR is confirmed back to the CLEC. Elapsed time for each LSR is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed to produce the Firm Order Confirmation timeliness interval distribution.

- **Mechanized:** The elapsed time from receipt of a valid LSR until the LSR is processed and appropriate service orders are generated in SOCS without manual intervention.
- **Partially Mechanized:** The elapsed time from receipt of an electronically submitted LSR which falls for manual handling by the LCSC personnel until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation system (SONGS).
- **Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized FOCs.
- **Non-Mechanized: (Under Development)** A valid LSR which is faxed or mailed to the BellSouth LCSC.

Calculation

Reject Interval = (a - b)

- a = Date & Time of Firm Order Confirmation
- b = Date & Time of Service Request Receipt)

Average Reject Interval = (c ÷ d)

- c = Sum of all Reject Intervals
- d = Total Number of Service Requests Confirmed in Reporting Period

FOC Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Service Requests Confirmed in interval
- f = Total Service Requests Confirmed in the Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized

- CLEC Specific
- CLEC Aggregate
- State and Region
- Fully Mechanized:
 - 0 - ≤15 minutes
 - > 15 - ≤ 30 minutes
 - > 30 - ≤ 45 minutes
 - > 45 - ≤ 60 minutes
 - > 60 - ≤ 90 minutes
 - > 90 - ≤ 120 minutes
 - > 120 - ≤ 180 minutes
 - 0 - ≤ 3 hours
 - > 3 - ≤ 6 hours

- > 6 - ≤ 12 hours
- > 12 - ≤ 24 hours
- > 24 - ≤ 48 hours
- > 48 hours
- Partially Mechanized:
 - 0 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 10 hours
 - 0 - ≤ 18 hours
 - > 10 - ≤ 18 hours
 - > 18 - ≤ 24 hours
 - > 24 - ≤ 48 hours
 - > 48 hours
- Non-Mechanized:
 - 0 - ≤ 4 hours
 - > 4 - ≤ 8 hours
 - > 8 - ≤ 12 hours
 - > 12 - ≤ 16 hours
 - > 16 - ≤ 20 hours
 - > 20 - ≤ 24 hours
 - > 24 - ≤ 36 hours
 - 0 - ≤ 36 hours
 - > 36 - ≤ 48 hours
 - > 48 hours

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
Report Month <ul style="list-style-type: none"> • Total Number of LSRs • Total Number of FOCs • State and Region 	Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • LNP • UNE Loop with LNP 	<ul style="list-style-type: none"> • Mechanized: 95% within 3 Hours • Partially Mechanized: 85% within 18 hours (10 hrs. after 6 months) • Non-Mechanized: 85% within 36 hours

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	Not Applicable

O-15: LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval

Section 3: Provisioning

P-1: Mean Held Order Interval & Distribution Intervals

Definition

When delays occur in completing CLEC orders, the average period that CLEC orders are held for BellSouth reasons, pending a delayed completion, should be no worse for the CLEC when compared to BellSouth delayed orders. Calculation of the interval is the total days orders are held and pending but not completed that have passed the currently committed due date; divided by the total number of held orders. This report is based on orders still pending, held and past their committed due date at the close of the reporting period. The distribution interval is based on the number of orders held and pending but not completed over 15 and 90 days. (Orders reported in the >90 day interval are also included in the >15 day interval.)

Exclusions

- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
- Disconnect (D) & From (F) orders
- Orders with appointment code of 'A' for Rural orders.

Business Rules

Mean Held Order Interval: This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as completed in SOCS and have passed the currently committed due date for the order. For each such order, the number of calendar days between the earliest committed due date on which BellSouth had a company missed appointment and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings, unless otherwise noted, and the reason for the order being held. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval. The interval is by calendar days with no exclusions for Holidays or Sundays.

CLEC Specific reporting is by type of held order (facilities, equipment, other), total number of orders held, and the total and average days.

Held Order Distribution Interval: This measure provides data to report total days held and identifies these in categories of >15 days and > 90 days. (Orders counted in >90 days are also included in > 15 days).

Calculation

Mean Held Order Interval = $a \div b$

- a = Sum of held-over-days for all Past Due Orders Held for the reporting period
- b = Number of Past Due Orders Held and Pending But Not Completed and past the committed due date

Held Order Distribution Interval (for each interval) = $(c \div d) \times 100$

- c = # of Orders Held for ≥ 15 days or # of Orders Held for ≥ 90 days
- d = Total # of Past Due Orders Held and Pending But Not Completed

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Circuit Breakout < 10, ≥ 10 (except trunks)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • CLEC Order Number and PON (PON) • Order Submission Date (TICKET_ID) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Hold Reason • Total line/circuit count • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • BellSouth Order Number • Order Submission Date • Committed Due Date • Service Type • Hold Reason • Total line/circuit count • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop-Non-Design	• Retail Residence and Business (POTS - Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN - BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-1: Mean Held Order Interval & Distribution Intervals

P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices

P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices

Definition

When BellSouth can determine in advance that a committed due date is in jeopardy for facility delay, it will provide advance notice to the CLEC.

The interval is from the date/time the notice is released to the CLEC/BellSouth systems until 5pm on the commitment date of the order. The Percent of Orders is the percentage of orders given jeopardy notices for facility delay in the count of orders confirmed in the report period.

Exclusions

- Orders held for CLEC end user reasons
- Disconnect (D) & From (F) orders

Business Rules

When BellSouth can determine in advance that a committed due date is in jeopardy for facility delay, it will provide advance notice to the CLEC. The number of committed orders in a report period is the number of orders that have a due date in the reporting period.

Jeopardy notices for interconnection trunks results are usually zero as these trunks seldom experience facility delays. The Committed due date is considered the Confirmed due date.

Calculation

Jeopardy Interval = a - b

- a = Date and Time of Jeopardy Notice
- b = Date and Time of Scheduled Due Date on Service Order

Average Jeopardy Interval = c ÷ d

- c = Sum of all jeopardy intervals
- d = Number of Orders Notified of Jeopardy in Reporting Period

Percent of Orders Given Jeopardy Notice = (e ÷ f) X 100

- e = Number of Orders Given Jeopardy Notices in Reporting Period
- f = Number of Orders Confirmed (due) in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Mechanized Orders
- Non-Mechanized Orders

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • CLEC Order Number and PON • Date and Time Jeopardy Notice sent • Committed Due Date • Service Type <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • BellSouth Order Number • Date and Time Jeopardy Notice sent • Committed Due Date • Service Type

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark:
% Orders Given Jeopardy Notice	
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail
• Average Jeopardy Notice Interval (Electronic Only)	• 95% ≥ 48 Hours

P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-3: Percent Missed Installation Appointments

Definition

“Percent missed installation appointments” monitors the reliability of BellSouth commitments with respect to committed due dates to assure that the CLEC can reliably quote expected due dates to their retail customer as compared to BellSouth. This measure is the percentage of total orders processed for which BellSouth is unable to complete the service orders on the committed due dates and reported for Total misses and End User Misses.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders Test Orders, etc.)
- Disconnect (D) & From (F) orders
- End User Misses on Interconnection Trunks

Business Rules

Percent Missed Installation Appointments (PMI) is the percentage of orders with completion dates in the reporting period that are past the original committed due date. Missed Appointments caused by end-user reasons will be included and reported separately. The first commitment date on the service order that is a missed appointment is the missed appointment code used for calculation whether it is a BellSouth missed appointment or an End User missed appointment. The “due date” is any time on the confirmed due date. Which means there cannot be a cutoff time for commitments, as certain types of orders are requested to be worked after standard business hours. Also, during Daylight Savings Time, field technicians are scheduled until 9PM in some areas and the customer is offered a greater range of intervals from which to select.

Calculation

Percent Missed Installation Appointments = $(a \div b) \times 100$

- a = Number of Orders with Completion date in Reporting Period past the Original Committed Due Date
- b = Number of Orders Completed in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Report in Categories of <10 lines/circuits ≥ 10 lines/circuits (except trunks)
- Dispatch/No Dispatch

Report Explanation: The difference between End User MA and Total MA is the result of BellSouth caused misses. Here, Total MA is the total percent of orders missed either by BellSouth or CLEC end user. The End User MA represents the percentage of orders missed by the CLEC or their end user.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • CLEC Order Number and PON (PON) • Committed Due Date (DD) • Completion Date (CMLTN DD) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • BellSouth Order Number • Committed Due Date (DD) • Completion Date (CMLTN DD) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN - BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

P-3: Percent Missed Installation Appointments

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

P-4: Average Completion Interval (OCI) & Order Completion Interval Distribution

Definition

The “average completion interval” measure monitors the interval of time it takes BellSouth to provide service for the CLEC or its own customers. The “Order Completion Interval Distribution” provides the percentages of orders completed within certain time periods. This report measures how well BellSouth meets the interval offered to customers on service orders.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
- Disconnect (D&F) orders (Except “D” orders associated with LNP Standalone)
- “L” Appointment coded orders (where the customer has requested a later than offered interval)
- End user-caused misses

Business Rules

The actual completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from when BellSouth issues a FOC or SOCS date time stamp receipt of an order from the CLEC to BellSouth’s actual order completion date. The clock starts when a valid order number is assigned by SOCS and stops when the technician or system completes the order in SOCS. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

The interval breakout for UNE and Design is: 0-5 = 0-4.99, 5-10 = 5-9.99, 10-15 = 10-14.99, 15-20 = 15- 19.99, 20-25 = 20-24.99, 25-30 = 25-29.99, $\geq 30 = 30$ and greater.

Calculation

Completion Interval = (a - b)

- a = Completion Date
- b = FOC/SOCS date time-stamp (application date)

Average Completion Interval = (c ÷ d)

- c = Sum of all Completion Intervals
- d = Count of Orders Completed in Reporting Period

Order Completion Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Service Orders Completed in “X” days
- f = Total Service Orders Completed in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Dispatch / No Dispatch categories applicable to all levels except trunks
- Residence & Business reported in day intervals = 0,1,3,4,5,5+
- UNE and Design reported in day intervals = 0-5,5-10,10-15,15-20,20-25,25-30, ≥ 30
- All Levels are reported <10 line/circuits; ≥ 10 line/circuits (except trunks)
- ISDN Orders included in Non-Design

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • CLEC Company Name • Order Number (PON) • Application Date & Time • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • BellSouth Order Number • Order Submission Date & Time • Order Completion Date & Time • Service Type • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch + 2 days
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• 7 Days w/o conditioning
• UNE xDSL (HDSL, ADSL and UCL)	• 14 Days with conditioning
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• 7 Days w/o conditioning
• UNE xDSL	• 14 Days with conditioning
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

P-4: Average Completion Interval (OCI) & Order Completion Interval Distribution

P-5: Average Completion Notice Interval

Definitions

The Completion Notice Interval is the elapsed time between the BellSouth reported completion of work and the issuance of a valid completion notice to the CLEC.

Exclusions

- Cancelled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
- D&F orders (Exception: "D" orders associated with LNP Standalone)

Business Rules

Measurement on interval of completion date and time entered by a field technician on dispatched orders, and 5PM start time on the due date for non-dispatched orders; to the release of a notice to the CLEC/BellSouth of the completion status. The field technician notifies the CLEC the work was complete and then he/she enters the completion time stamp information in his/her computer. This information switches through to the SOCS systems either completing the order or rejecting the order to the Work Management Center (WMC). If the completion is rejected, it is manually corrected and then completed by the WMC. The notice is returned on each individual order.

The start time for all orders is the completion stamp either by the field technician or the 5PM due date stamp; the end time for mechanized orders is the time stamp the notice was transmitted to the CLEC interface (LENS, EDI, OR TAG). For non-mechanized orders the end timestamp will be timestamp of order update to C-SOTS system.

Calculation

Completion Notice Interval = (a - b)

- a = Date and Time of Notice of Completion
- b = Date and Time of Work Completion

Average Completion Notice Interval = $c \div d$

- c = Sum of all Completion Notice Intervals
- d = Number of Orders with Notice of Completion in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Mechanized Orders
- Non-Mechanized Orders
- Reporting intervals in Hours; 0-1, 2-4, 4-8, 8-12, 12-24, ≥ 24 plus Overall Average Hour Interval (The categories are inclusive of these time intervals: 0-1 = 0.99; 1-2 = 1-1.99; 2-4 = 2-3.99, etc.)
- Reported in categories of <10 line / circuits; ≥ 10 line/circuits (except trunks)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • CLEC Order Number (so_nbr) • Work Completion Date (cmpltn_dt) • Work Completion Time • Completion Notice Availability Date • Completion Notice Availability Time • Service Type • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • BellSouth Order Number (so_nbr) • Work Completion Date (cmpltn_dt) • Work Completion Time • Completion Notice Availability Date • Completion Notice Availability Time • Service Type • Geographic Scope <p>NOTE: Code in parentheses is the corresponding header found in the raw data file.</p>

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence and Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-5: Average Completion Notice Interval

P-6: Coordinated Customer Conversions Interval

Definition

This report measures the average time it takes BellSouth to disconnect an unbundled loop from the BellSouth switch and cross connect it to a CLEC equipment. This measurement applies to service orders with and without LNP, and where the CLEC has requested BellSouth to provide a coordinated cut over.

Exclusions

- Any order canceled by the CLEC will be excluded from this measurement.
- Delays due to CLEC following disconnection of the unbundled loop
- Unbundled Loops where there is no existing subscriber loop and loops where coordination is not requested.

Business Rules

Where the service order includes LNP, the interval includes the total time for the cut over including the translation time to place the line back in service on the ported line. The interval is calculated for the entire cut over time for the service order and then divided by items worked in that time to give the average per-item interval for each service order.

Calculation

Coordinated Customer Conversions Interval = (a - b)

- a = Completion Date and Time for Cross Connection of a Coordinated Unbundled Loop
- b = Disconnection Date and Time of an Coordinated Unbundled Loop

Percent Coordinated Customer Conversions (for each interval) = (c ÷ d) X 100

- c = Total number of Coordinated Customer Conversions for each interval
- d = Total Number of Unbundled Loop with Coordinated Conversions (items) for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- The interval breakout is 0<5 = 0-4.99, 5<15 = 5-14.99, ≥15 = 15 and greater, plus Overall Average Interval.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • CLEC Order Number • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Cut over Start Time • Cut over Completion time • Portability start and completion times (INP orders) • Total Conversions (Items) <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • No BellSouth Analog Exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
<ul style="list-style-type: none"> • Unbundled Loops with INP • Unbundled Loops with LNP 	<ul style="list-style-type: none"> • 95% ≤ 15 minutes

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none">• Unbundled Loops	<ul style="list-style-type: none">• 95% ≤ 15 minutes

P-6A: Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval

Definition

This category measures whether BellSouth begins the cut over of an unbundled loop on a coordinated and/or a time specific order at the CLEC requested start time. It measures the percentage of orders where the cut begins within 15 minutes of the requested start time of the order and the average interval.

Exclusions

- Any order canceled by the CLEC will be excluded from this measurement.
- Delays caused by the CLEC
- Unbundled Loops where there is no existing subscriber loop and loops where coordination is not requested.
- All unbundled loops on multiple loop orders after the first loop.

Business Rules

This report measures whether BellSouth begins the cut over of an unbundled loop on a coordinated and/or a time specific order at the CLEC requested start time. The cut is considered on time if it starts 15 minutes before or after the requested start time. Using the scheduled time and the actual cut over start time, the measurement will calculate the percent within interval and the average interval. If a cut involves multiple lines, the cut will be considered “on time” if the first line is cut within the interval. ≤ 15 minutes includes intervals that began 15:00 minutes or less before the scheduled cut time and cuts that began 15 minutes or less after the scheduled cut time; >15 minutes, ≤30 minutes includes cuts within 15:00 – 30:00 minutes either prior to or after the scheduled cut time; >30 minutes includes cuts greater than 30:00 minutes either prior to or after the scheduled cut time. If IDLC is involved, a four hour window applies to the start time. (8 A.M. to Noon or 1 P.M. to 5 P.M.) This only applies if BellSouth notifies the CLEC by 10:30 A.M. on the day before the due date that the service is on IDLC.

A Hot Cut is considered complete when one of the following occurs:

1. BellSouth performs the hot cut, notifies the CLEC by telephone.
2. BellSouth performs the hot cut and attempts to notify the CLEC by telephone, but receives no answer and leaves a phone message.

Calculation

% within Interval = $(a \div b) \times 100$

- a = Total Number of Coordinated Unbundled Loop Orders for the interval
- b = Total Number of Coordinated Unbundled Loop Orders for the reporting period

Interval = $(c - d)$

- c = Scheduled Time for Cross Connection of a Coordinated Unbundled Loop Order
- d = Actual Start Date and Time of a Coordinated Unbundled Loop Order

Average Interval = $(e \div f)$

- Sum of all Intervals
- Total Number of Coordinated Unbundled Loop Orders for the reporting period.

Report Structure

- CLEC Specific
- CLEC Aggregate
Reported in intervals of early, on time and late cuts %≤ 15 minutes; % >15 minutes, ≤30 minutes; % >30 minutes, plus Overall Average Interval

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • CLEC Order Number (so_nbr) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Cut over Scheduled Start Time • Cut over Actual Start Time • Total Conversions Orders <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • No BellSouth Analog exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
<ul style="list-style-type: none"> • Product Reporting Level <ul style="list-style-type: none"> - SL1 Time Specific - SL1 Non-Time Specific - SL2 Time Specific - SL2 Non-Time Specific 	<ul style="list-style-type: none"> • 95% Within + or – 15 minutes of Scheduled Start Time
<ul style="list-style-type: none"> - SL1 IDLC - SL2 IDLC 	<ul style="list-style-type: none"> • 95% within 4-hour window

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> - UNE Loops 	<ul style="list-style-type: none"> • 95% Within + or – 15 minutes of Scheduled Start time
<ul style="list-style-type: none"> - SL1 IDLC - SL2 IDLC 	<ul style="list-style-type: none"> • 95% within 4-hour window

P-6B: Coordinated Customer Conversions – Average Recovery Time

Definition

Measures the time between notification and resolution by BellSouth of a service outage found that can be isolated to the BellSouth side of the network. The time between notification and resolution by BellSouth must be measured to ensure that CLEC customers do not experience unjustifiable lengthy service outages during a Coordinated Customer Conversion. This report measures outages associated with Coordinated Customer Conversions prior to service order completion.

Exclusions

- Cut overs where service outages are due to CLEC caused reasons
- Cut overs where service outages are due to end-user caused reasons

Business Rules

Measures the outage duration time related to Coordinated Customer Conversions from the initial trouble notification until the trouble has been restored and the CLEC has been notified. The duration time is defined as the time from the initial trouble notification until the trouble has been restored and the CLEC has been notified. The interval is calculated on the total outage time for the circuits divided by the total number of outages restored during the report period to give the average outage duration.

Calculation

Recovery Time = (a - b)

- a = Date & Time That Trouble is Closed by CLEC
- b = Date & Time Initial Trouble is Opened with BellSouth

Average Recovery Time = (c ÷ d)

- c = Sum of all the Recovery Times
- d = Number of Troubles Referred to the BellSouth

Report Structure

- CLEC Specific
- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report month • CLEC Company Name • CLEC Order Number (so_nbr) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • CLEC Acceptance Conflict (CLEC_CONFLICT) under development • CLEC Conflict Resolved (CLEC_RESOLVE) under development • CLEC Conflict MFC (CLEC_CONFLICT_MFC) under development • Total Conversion Orders <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • None

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Unbundled Loops with INP • Unbundled Loops with LNP 	<ul style="list-style-type: none"> • Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

P-6B: Coordinated Customer Conversions – Average Recovery Time

P-6C: Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order

P-6C: Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order

Definition

The Percent Provisioning Troubles received within 7 days of a completed service order associated with a Coordinated Customer Conversion (CCC) measures the quality and accuracy of Coordinated Customer Conversion Activities.

Exclusions

- Any order canceled by the CLEC
- Troubles caused by Customer Provided Equipment

Business Rules

Measures the quality and accuracy of completed service orders associated with Coordinated Customer Conversions. The first trouble report received on a circuit ID within 7 days following a service order completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate. Reports are calculated searching in the prior report period for completed Coordinated Customer Conversion service orders and following 7 days after the completion of the service order for a trouble report issue date.

Calculation

% Provisioning Troubles within 7 days of service order completion = $(a \div b) \times 100$

- a = The sum of all CCC Circuits with a trouble within 7 days following service order(s) completion
- b = The total number of CCC service order circuits completed in the previous report calendar month

Report Structure

- CLEC Specific
- CLEC Aggregate
- Dispatch/Non-Dispatch

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • CLEC Order Number (so_nbr) • PON • Order Submission Date (TICKET_ID) • Order Submission Time (TICKET_ID) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope • Total conversion circuits <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • No BellSouth Analog exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
<ul style="list-style-type: none"> • UNE Loop Design • UNE Loop Non-Design • Dispatch/Non-Dispatch 	<ul style="list-style-type: none"> • ≤ 5%

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • UNE Loops 	<ul style="list-style-type: none"> • ≤ 5%

P-6C: Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order

P-7: Cooperative Acceptance Testing - % of xDSL Loops Tested

Definition

The loop will be considered cooperatively tested when the BellSouth technician places a call to the CLEC representative to initiate cooperative testing and jointly performs the tests with the CLEC.

Exclusions

- Testing failures due to CLEC (incorrect contact number, CLEC not ready, etc.)
- xDSL lines with no request for cooperative testing

Business Rules

When a BellSouth technician finishes delivering an order for an xDSL loop where the CLEC order calls for cooperative testing at the customer's premise, the BellSouth technician is to call a toll free number to the CLEC testing center. The BellSouth technician and the CLEC representative at the center then test the line. As an example of the type of testing performed, the testing center may ask the technician to put a short on the line so that the center can run a test to see if it can identify the short.

Calculation

Cooperative Acceptance Testing - % of xDSL Loops Tested = $(a \div b) \times 100$

- a = Total number of successful xDSL cooperative tests for xDSL lines where cooperative testing was requested in the reporting period
- b = Total Number of xDSL line tests requested by the CLEC and scheduled in the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Type of Loop tested

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • CLEC Company Name (OCN) • CLEC Order Number (so_nbr) and PON (PON) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Acceptance Testing Completed (ACCEPT_TESTING) under development • Acceptance Testing Declined (ACCEPT_TESTING) under development • Total xDSL Orders <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • No BellSouth analog exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation:	Retail Analog/Benchmark:
<ul style="list-style-type: none"> • UNE xDSL <ul style="list-style-type: none"> - ADSL - HDSL - UCL - OTHER 	<ul style="list-style-type: none"> • 95% of Lines Tested

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation:	SEEM Analog/Benchmark:
• UNE xDSL	• 95% of Lines Tested

P-7: Cooperative Acceptance Testing - % of xDSL Loops Tested

P-8: % Provisioning Troubles within 30 days of Service Order Completion

P-8: % Provisioning Troubles within 30 days of Service Order Completion

Definition

Percent Provisioning Troubles within 30 days of Service Order Completion measures the quality and accuracy of Service order activities.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
- D & F orders
- Trouble reports caused and closed out to Customer Provided Equipment (CPE)

Business Rules

Measures the quality and accuracy of completed orders. The first trouble report from a service order after completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate. Reports are calculated searching in the prior report period for completed service orders and following 30 days after completion of the service order for a trouble report issue date.

D & F orders are excluded as there is no subsequent activity following a disconnect.

Note: Standalone LNP historical data is not available in the maintenance systems (LMOS or WFA).

Calculation

% Provisioning Troubles within 30 days of Service Order Activity = (a ÷ b) X 100

- a = Trouble reports on all completed orders 30 days following service order(s) completion
- b = All Service Orders completed in the previous report calendar month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Reported in categories of <10 line/circuits; ≥ 10 line/circuits (except trunks)
- Dispatch / No Dispatch (except trunks)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • CLEC Order Number and PON • Order Submission Date (TICKET_ID) • Order Submission Time (TICKET_ID) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report Month • BellSouth Order Number • Order Submission Date • Order Submission Time • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Resale Residence 	<ul style="list-style-type: none"> • Retail Residence

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non -Design	• Retail Residence and Business (POTS - Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

P-9: Total Service Order Cycle Time (TSOCT)

Definition

This report measures the total service order cycle time from receipt of a valid service order request to the return of a completion notice to the CLEC Interface.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
- D (Disconnect - Except "D" orders associated with LNP Standalone.) and F (From) orders. (From is disconnect side of a move order when the customer moves to a new address).
- "L" Appointment coded orders (where the customer has requested a later than offered interval)
- Orders with CLEC/Subscriber caused delays or CLEC/Subscriber requested due date changes.

Business Rules

The interval is determined for each order processed during the reporting period. This measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval.

This interval starts with the receipt of a valid service order request and stops when a completion notice is sent to the CLEC Interface (LENS, TAG OR EDI). Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

Reporting is by Fully Mechanized, Partially Mechanized and Non-Mechanized receipt of LSRs.

Calculation

Total Service Order Cycle Time = (a - b)

- a = Service Order Completion Notice Date
- b = Service Request Receipt Date

Average Total Service Order Cycle Time = (c ÷ d)

- c = Sum of all Total Service Order Cycle Times
- d = Total Number Service Orders Completed in Reporting Period

Total Service Order Cycle Time Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Total Number of Service Requests Completed in "X" minutes/hours
- f = Total Number of Service Requests Received in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Fully Mechanized; Partially Mechanized; Non-Mechanized
- Report in categories of <10 line/circuits; ≥ 10 line/circuits (except trunks)
- Dispatch / No Dispatch categories applicable to all levels except trunks
- Intervals 0-5, 5-10, 10-15, 15-20, 20-25, 25-30, ≥ 30 Days. The interval breakout is: 0-5 = 0-4.99, 5-10 = 5-9.99, 10-15 = 10-14.99, 15-20 = 15-19.99, 20-25 = 20-24.99, 25-30 = 25-29.99, ≥ 30 = 30 and greater.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Interval for FOC • CLEC Company Name (OCN) • Order Number (PON) • Submission Date & Time (TICKET_ID) • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file</p>	<ul style="list-style-type: none"> • Report Month • BellSouth Order Number • Order Submission Date & Time • Order Completion Date & Time • Service Type • Geographic Scope

P-9: Total Service Order Cycle Time (TSOCT)

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Resale Residence • Resale Business • Resale Design • Resale PBX • Resale Centrex • Resale ISDN • LNP (Standalone) • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Switch ports • UNE Digital Loops < DS1 • UNE Digital Loops ≥ DS1 • UNE Loop + Port Combinations • UNE Combo Other • UNE xDSL (HDSL, ADSL and UCL) • UNE ISDN • UNE Line Sharing • Local Transport (Unbundled Interoffice Transport) • Local Interconnection Trunks 	<ul style="list-style-type: none"> • Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

P-10: LNP-Percent Missed Installation Appointments

Definition

“Percent missed installation appointments” monitors the reliability of BellSouth commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customer as compared to BellSouth. This measure is the percentage of total orders processed for which BellSouth is unable to complete the service orders on the committed due dates and reported for total misses and End User Misses.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) where identifiable

Business Rules

Percent Missed Installation Appointments (PMI) is the percentage of total orders processed for which BellSouth is unable to complete the service orders on the committed due dates. Missed Appointments caused by end-user reasons will be included and reported in a separate category. The first commitment date on the service order that is a missed appointment is the missed appointment code used for calculation whether it is a BellSouth missed appointment or an End User missed appointment. The “due date” is any time on the confirmed due date, which means there cannot be a cutoff time for commitments as certain types of orders are requested to be worked after standard business hours. Also, during Daylight Savings Time, field technicians are scheduled until 9PM in some areas and the customer is offered a greater range of intervals from which to select.

Calculation

$$\text{LNP Percent Missed Installation Appointments} = (a \div b) \times 100$$

- a = Number of Orders with Completion date in Reporting Period past the Original Committed Due Date
- b = Number of Orders Completed in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
 - State/Region
- Report in Categories of <10 lines/circuits ≥ 10 lines/circuits (except trunks)
- Dispatch/No Dispatch

Report explanation: Total Missed Appointments is the total percent of orders missed either by BellSouth or the CLEC end user. End User MA represents the percentage of orders missed by the CLEC end user. The difference between End User Missed Appointments and Total Missed Appointments is the result of BellSouth caused misses.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report month • CLEC Order Number and PON (PON) • Committed Due Date (DD) • Completion Date (CMPLTN DD) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<p>Not Applicable</p>

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• LNP	• Retail Residence & Business (POTS)

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• LNP	• Retail Residence & Business (POTS)

P-10: LNP-Percent Missed Installation Appointments

P-11: LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution

Definition

Disconnect Timeliness is defined as the interval between the time ESI Number Manager receives the valid 'Number Ported' message from NPAC (signifying the CLEC 'Activate') until the time the Disconnect is completed in the Central Office switch. This interval effectively measures BellSouth responsiveness by isolating it from impacts that are caused by CLEC related activities.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) where identifiable.

Business Rules

The Disconnect Timeliness interval is determined for each number ported associated with a disconnect service order processed on an LSR during the reporting period. The Disconnect Timeliness interval is the elapsed time from when BellSouth receives a valid 'Number Ported' message in ESI Number Manager (signifying the CLEC 'Activate') for each telephone number ported until each number on the service order is disconnected in the Central Office switch. Elapsed time for each ported number is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the total number of selected telephone numbers disconnected in the reporting period.

Calculation

Disconnect Timeliness Interval = (a - b)

- a = Completion Date and Time in Central Office switch for each number on disconnect order
- b = Valid 'Number Ported' message received date & time

Average Disconnect Timeliness Interval = (c ÷ d)

- c = Sum of all Disconnect Timeliness Intervals
- d = Total Number of disconnected numbers completed in reporting period

Disconnect Timeliness Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Disconnected numbers completed in "X" days
- f = Total disconnect numbers completed in reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
 - State, Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Order Number • Telephone Number / Circuit Number • Committed Due Date • Receipt Date / Time (ESI Number Manager) • Date/Time of Recent Change Notice 	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation:	SQM Retail Analog/Benchmark:
• LNP	• 95% within 15 Minutes

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• LNP	• 95% within 15 Minutes

P-12: LNP-Total Service Order Cycle Time (TSOCT)

Definition

Total Service Order Cycle Time measures the interval from receipt of a valid service order request to the completion of the final service order associated with that service request.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) where identifiable
- "L" appointment coded orders (indicating the customer has requested a later than offered interval)
- "S" missed appointment coded orders (indicating subscriber missed appointments), except for "SP" codes (indicating subscriber prior due date requested). This would include "S" codes assigned to subsequent due date changes.

Business Rules

The interval is determined for each order processed during the reporting period. This measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval.

This interval starts with the receipt of a valid service order request and stops when a completion notice is sent to the CLEC Interface (LENS, TAG OR EDI). Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

Reporting is by Fully Mechanized, Partially Mechanized and Non-Mechanized receipt of LSRs.

Calculation

Total Service Order Cycle Time = (a - b)

- a = Service Order Completion Notice Date
- b = Service Request Receipt Date

Average Total Service Order Cycle Time = (c ÷ d)

- c = Sum of all Total Service Order Cycle Times
- d = Total Number Service Orders Completed in Reporting Period

Total Service Order Cycle Time Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Total Number of Service Orders Completed in "X" minutes/hours
- f = Total Number of Service Orders Received in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Fully Mechanized; Partially Mechanized; Non-Mechanized
- Report in categories of <10 line/circuits; ≥ 10 line/circuits (except trunks)
- Dispatch / No Dispatch categories applicable to all levels except trunks
- Intervals 0-5, 5-10, 10-15, 15-20, 20-25, 25-30, ≥ 30 Days. The interval breakout is: 0-5 = 0-4.99, 5-10 = 5-9.99, 10-15 = 10-14.99, 15-20 = 15-19.99, 20-25 = 20-24.99, 25-30 = 25-29.99, ≥ 30 = 30 and greater.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Interval for FOC • CLEC Company Name (OCN) • Order Number (PON) • Submission Date & Time (TICKET_ID) • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file</p>	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • LNP 	<ul style="list-style-type: none"> • Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

P-12: LNP-Total Service Order Cycle Time (TSOCT)

Section 4: Maintenance & Repair

M&R-1: Missed Repair Appointments

Definition

The percent of trouble reports not cleared by the committed date and time.

Exclusions

- Trouble tickets canceled at the CLEC request.
- BellSouth trouble reports associated with internal or administrative service.
- Customer Provided Equipment (CPE) troubles or CLEC Equipment Trouble.

Business Rules

The negotiated commitment date and time is established when the repair report is received. The cleared time is the date and time that BellSouth personnel clear the trouble and closes the trouble report in his/her Computer Access Terminal (CAT) or workstation. If this is after the Commitment time, the report is flagged as a “Missed Commitment” or a missed repair appointment. When the data for this measure is collected for BellSouth and a CLEC, it can be used to compare the percentage of the time repair appointments are missed due to BellSouth reasons. (No access reports are not part of this measure because they are not a missed appointment.)

Note: Appointment intervals vary with force availability in the POTS environment. Specials and Trunk intervals are standard interval appointments of no greater than 24 hours. Standalone LNP historical data is not available in the maintenance systems (LMOS or WFA).

Calculation

Percentage of Missed Repair Appointments = $(a \div b) \times 100$

- a = Count of Customer Troubles Not Cleared by the Quoted Commitment Date and Time
- b = Total Trouble reports closed in Reporting Period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • CLEC Company Name • Submission Date & Time (TICKET_ID) • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • BellSouth Company Code • Submission Date & Time • Completion Date • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Retail Analog/Benchmark

SQM Level of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

M&R-1: Missed Repair Appointments

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-2: Customer Trouble Report Rate

Definition

Percent of initial and repeated customer direct or referred troubles reported within a calendar month for lines/circuits in service.

Exclusions

- Trouble tickets canceled at the CLEC request.
- BellSouth trouble reports associated with internal or administrative service.
- Customer Provided Equipment (CPE) troubles or CLEC Equipment Trouble.
- LMOS - Code 7 (Test OK), Code 8 (Found OK - In), Code 9 (Found OK - Out)
- WFA - No Trouble Found (NTF)

Business Rules

Customer Trouble Report Rate is computed by accumulating the number of maintenance initial and repeated trouble reports during the reporting period. The resulting number of trouble reports are divided by the total "number of service" lines, ports or combination that exist for the CLECs and BellSouth respectively at the end of the report month.

Calculation

$$\text{Customer Trouble Report Rate} = (a \div b) \times 100$$

- a = Count of Initial and Repeated Trouble Reports closed in the Current Period
- b = Number of Service Access Lines in service at End of the Report Period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMLTN_DT) • Service Type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • # Service Access Lines in Service at the end of period • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • BellSouth Company Code • Ticket Submission Date & Time • Ticket Completion Date • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • # Service Access Lines in Service at the end of period • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-3: Maintenance Average Duration

Definition

The Average duration of Customer Trouble Reports from the receipt of the Customer Trouble Report to the time the trouble report is cleared.

Exclusions

- Trouble tickets canceled at the CLEC request.
- BellSouth trouble reports associated with internal or administrative service.
- Customer Provided Equipment (CPE) troubles or CLEC Equipment Trouble.

Business Rules

For Average Duration the clock starts on the date and time of the receipt of a correct repair request. The clock stops on the date and time the service is restored and the BellSouth or CLEC customer is notified (when the technician completes the trouble ticket on his/her CAT or work systems).

Calculation

Maintenance Duration = (a - b)

- a = Date and Time of Service Restoration
- b = Date and Time Trouble Ticket was Opened

Average Maintenance Duration = (c ÷ d)

- c = Total of all maintenance durations in the reporting period
- d = Total Closed Troubles in the reporting period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience:	Relating to BellSouth Performance:
<ul style="list-style-type: none"> • Report month • Total Tickets (LINE_NBR) • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMLPTN_DT) • Service Type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • Total Tickets • BellSouth Company Code • Ticket Submission Date • Ticket Submission Time • Ticket Completion Date • Ticket Completion Time • Total Duration Time • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> • Resale Residence 	<ul style="list-style-type: none"> • Retail Residence
<ul style="list-style-type: none"> • Resale Business 	<ul style="list-style-type: none"> • Retail business

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN -- BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-4: Percent Repeat Troubles within 30 Days

M&R-4: Percent Repeat Troubles within 30 Days

Definition

Closed trouble reports on the same line/circuit as a previous trouble report received within 30 calendar days as a percent of total troubles closed reported

Exclusions

- Trouble tickets canceled at the CLEC request.
- BellSouth trouble reports associated with internal or administrative service.
- Customer Provided Equipment (CPE) troubles or CLEC Equipment Trouble.

Business Rules

Includes Customer trouble reports received within 30 days of an original Customer trouble report

Calculation

$$\text{Percent Repeat Troubles within 30 Days} = (a \div b) \times 100$$

- a = Count of closed Customer Troubles where more than one trouble report was logged for the same service line within a continuous 30 days
- b = Total Trouble Reports Closed in Reporting Period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • Total Tickets (LINE_NBR) • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMPLTN_DT) • Total and Percent Repeat Trouble Reports within 30 Days (TOT_REPEAT) • Service Type • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report month • Total Tickets • BellSouth Company Code • Ticket Submission Date • Ticket Submission Time • Ticket Completion Date • Ticket Completion Time • Total and Percent Repeat Trouble Reports within 30 Days • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-5: Out of Service (OOS) > 24 Hours

Definition

For Out of Service Troubles (no dial tone, cannot be called or cannot call out) the percentage of Total OOS Troubles cleared in excess of 24 hours. (All design services are considered to be out of service).

Exclusions

- Trouble Reports canceled at the CLEC request
- BellSouth Trouble Reports associated with administrative service
- Customer Provided Equipment (CPE) Troubles or CLEC Equipment Troubles.

Business Rules

Customer Trouble reports that are out of service and cleared in excess of 24 hours. The clock begins when the trouble report is created in LMOS/WFA and the trouble is counted if the elapsed time exceeds 24 hours.

Calculation

Out of Service (OOS) > 24 hours = $(a \div b) \times 100$

- a = Total Cleared Troubles OOS > 24 Hours
- b = Total OOS Troubles in Reporting Period

Report Structure

- Dispatch / Non - Dispatch
- CLEC Specific
- BellSouth Aggregate
- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Total Tickets • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMPLTN_DT) • Percentage of Customer Troubles out of • Service > 24 Hours (OOS>24_FLAG) • Service type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE-DESC) • Geographic Scope <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Report Month • Total Tickets • BellSouth Company Code • Ticket Submission Date • Ticket Submission time • Ticket Completion Date • Ticket Completion Time • Percent of Customer Troubles out of Service > 24 Hours • Service type • Disposition and Cause (Non-Design/Non-Special only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

M&R-6: Average Answer Time – Repair Centers

M&R-6: Average Answer Time – Repair Centers

Definition

This measures the average time a customer is in queue when calling a BellSouth Repair Center.

Exclusions

None

Business Rules

The clock starts when a CLEC Representative or BellSouth customer makes a choice on the Repair Center's menu and is put in queue for the next repair attendant. The clock stops when the repair attendant answers the call (abandoned calls are not included).

Note: The Total Column is a combined BellSouth Residence and Business number.

Calculation

Answer Time for BellSouth Repair Centers = (a - b)

- a = Time BellSouth Repair Attendant Answers Call
- b = Time of entry into queue after ACD Selection

Average Answer Time for BellSouth Repair Centers = (c ÷ d)

- c = Sum of all Answer Times
- d = Total number of calls by reporting period

Report Structure

- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• CLEC Average Answer Time	• BellSouth Average Answer Time

SQM Disaggregation - Analog / Benchmark

SQM Level of Disaggregation	Retail Analog / Benchmark
• Region. CLEC/BellSouth Service Centers and BellSouth Repair Centers are regional.	• For CLEC, Average Answer Times in UNE Center and BRMC are comparable to the Average Answer Times in the BellSouth Repair Centers.

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

M&R-7: Mean Time To Notify CLEC of Network Outages

Definition

BellSouth will inform the CLEC of any Network outages (key customer accounts)

Exclusions

None

Business Rules

The time it takes for the BellSouth Network Reliability Center (NRC) to notify the CLEC and BellSouth of a customer impacting network incident in equipment that may be utilized by the CLEC. When the BellSouth NRC becomes aware of a network incident, the CLEC and BellSouth will be notified electronically. The notification time for each outage will be measured in minutes and divided by the number of outages for the reporting period. The CLECs will be notified the same way and at the same time as BellSouth Retail. These are broadcast messages. It is up to those receiving the message to determine if they have customers affected by the incident.

Calculation

Time to Notify CLEC = (a - b)

- a = Date and Time BellSouth Notified CLEC
- b = Date and time BellSouth detected network incident

Mean Time to Notify CLEC = (c ÷ d)

- c = Sum of all Times to Notify CLEC
- d = Count of Network Incidents

Report Structure

- BellSouth Aggregate
- CLEC Aggregate
- CLEC Specific

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Major Network events • Date/Time of Incident • Date/Time of Notification 	<ul style="list-style-type: none"> • Report Month • Major Network events • Date/Time of Incident • Date/Time of Notification

SQM Disaggregation - Analog / Benchmark

SQM Level of Disaggregation	Retail Analog / Benchmark
<ul style="list-style-type: none"> • BellSouth Aggregate • CLEC Aggregate • CLEC Specific 	<ul style="list-style-type: none"> • Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

M&R-7: Mean Time To Notify CLEC of Network Outages

Section 5: Billing

B-1: Invoice Accuracy

Definition

This measure provides the percentage of accuracy of the billing invoices rendered to CLECs during the current month.

Exclusions

- Adjustments not related to billing errors (e.g., credits for service outage, special promotion credits, adjustments to satisfy the customer)
- Test Accounts

Business Rules

The accuracy of billing invoices delivered by BellSouth to the CLEC must enable them to provide a degree of billing accuracy comparative to BellSouth bills rendered to retail customers of BellSouth. CLECs request adjustments on bills determined to be incorrect. The BellSouth Billing verification process includes manually analyzing a sample of local bills from each bill period. The bill verification process draws from a mix of different customer billing options and types of service. An end-to-end auditing process is performed for new products and services. Internal measurements and controls are maintained on all billing processes.

Calculation

$$\text{Invoice Accuracy} = [(a - b) \div a] \times 100$$

- a = Absolute Value of Total Billed Revenues during current month
- b = Absolute Value of Billing Related Adjustments during current month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
 - Region
 - State

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report Month • Invoice Type <ul style="list-style-type: none"> - UNE - Resale - Interconnection • Total Billed Revenue • Billing Related Adjustments 	<ul style="list-style-type: none"> • Report month • Retail Type <ul style="list-style-type: none"> - CRIS - CABS • Total Billed Revenue • Billing Related Adjustments

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Product / Invoice Type - Resale - UNE - Interconnection 	<ul style="list-style-type: none"> • CLEC Invoice Accuracy is comparable to BellSouth Invoice Accuracy

B-1: Invoice Accuracy

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • CLEC State • BellSouth State 	<ul style="list-style-type: none"> • Parity with Retail

B2: Mean Time to Deliver Invoices

Definition

Bill Distribution is calculated as follows: CRIS BILLS-The number of workdays is reported for CRIS bills. This is calculated by counting the Bill Period date as the first work day. Weekends and holidays are excluded when counting workdays. J/N Bills are counted in the CRIS work day category for the purposes of the measurement since their billing account number (Q account) is provided from the CRIS system.

CABS BILLS-The number of calendar days is reported for CABS bills. This is calculated by counting the day following the Bill Period date as the first calendar day. Weekends and holidays are included when counting the calendar days.

Exclusions

Any invoices rejected due to formatting or content errors.

Business Rules

This report measures the mean interval for timeliness of billing records delivered to CLECs in an agreed upon format. CRIS-based invoices are measured in business days, and CABS-based invoices in calendar days.

Calculation

Invoice Timeliness = (a - b)

- a = Invoice Transmission Date
- b = Close Date of Scheduled Bill Cycle

Mean Time To Deliver Invoices = (c ÷ d)

- c = Sum of all Invoice Timeliness intervals
- d = Count of Invoices Transmitted in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
 - Region
 - State

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report month • Invoice Type <ul style="list-style-type: none"> - UNE - Resale - Interconnection • Invoice Transmission Count • Date of Scheduled Bill Close 	<ul style="list-style-type: none"> • Report month • Invoice Type <ul style="list-style-type: none"> - CRIS - CABS • Invoice Transmission Count • Date of Scheduled Bill Close

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
Product / Invoice Type <ul style="list-style-type: none"> • Resale • UNE • Interconnection 	<ul style="list-style-type: none"> • CRIS-based invoices will be released for delivery within six (6) business days. • CABS-based invoices will be released for delivery within eight (8) calendar days. • CLEC Average Delivery Intervals for both CRIS and CABS Invoices are comparable to BellSouth Average delivery for both systems.

B2: Mean Time to Deliver Invoices

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • CLEC State <ul style="list-style-type: none"> - CRIS - CABS • BellSouth Region 	<ul style="list-style-type: none"> • Parity with Retail

B3: Usage Data Delivery Accuracy

Definition

This measurement captures the percentage of recorded usage that is delivered error free and in an acceptable format to the appropriate Competitive Local Exchange Carrier (CLEC). These percentages will provide the necessary data for use as a comparative measurement for BellSouth performance. This measurement captures Data Delivery Accuracy rather than the accuracy of the individual usage recording.

Exclusions

None

Business Rules

The accuracy of the data delivery of usage records delivered by BellSouth to the CLEC must enable them to provide a degree of accuracy comparative to BellSouth bills rendered to their retail customers. If errors are detected in the delivery process, they are investigated, evaluated and documented. Errors are corrected and the data retransmitted to the CLEC.

Calculation

Usage Data Delivery Accuracy = $(a - b) \div a \times 100$

- a = Total number of usage data packs sent during current month
- b = Total number of usage data packs requiring retransmission during current month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
 - Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report Month • Record Type <ul style="list-style-type: none"> - BellSouth Recorded - Non-BellSouth Recorded 	<ul style="list-style-type: none"> • Report month • Record Type

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Region 	<ul style="list-style-type: none"> • CLEC Usage Data Delivery Accuracy is comparable to BellSouth Usage Data Delivery Accuracy

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none">• CLEC State• BellSouth Region	<ul style="list-style-type: none">• Parity with Retail

B3: Usage Data Delivery Accuracy

B4: Usage Data Delivery Completeness

Definition

This measurement provides percentage of complete and accurately recorded usage data (usage recorded by BellSouth and usage recorded by other companies and sent to BellSouth for billing) that is processed and transmitted to the CLEC within thirty (30) days of the message recording date. A parity measure is also provided showing completeness of BellSouth messages processed and transmitted via CMDS. BellSouth delivers its own retail usage from recording location to billing location via CMDS as well as delivering billing data to other companies. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.

Exclusions

None

Business Rules

The purpose of these measurements is to demonstrate the level of quality of usage data delivered to the appropriate CLEC. Method of delivery is at the option of the CLEC.

Calculation

Usage Data Delivery Completeness = $(a \div b) \times 100$

- a = Total number of Recorded usage records delivered during current month that are within thirty (30) days of the message recording date
- b = Total number of Recorded usage records delivered during the current month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report Month • Record Type <ul style="list-style-type: none"> - BellSouth Recorded - Non-BellSouth Recorded 	<ul style="list-style-type: none"> • Report month • Record Type

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Region 	<ul style="list-style-type: none"> • CLEC Usage Data Delivery Completeness is comparable to BellSouth Usage Data Delivery Completeness

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

B4: Usage Data Delivery Completeness

B5: Usage Data Delivery Timeliness

Definition

This measurement provides a percentage of recorded usage data (usage recorded by BellSouth and usage recorded by other companies and sent to BellSouth for billing) that is delivered to the appropriate CLEC within six (6) calendar days from the receipt of the initial recording. A parity measure is also provided showing timeliness of BellSouth messages processed and transmitted via CMDS. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.

Exclusions

None

Business Rules

The purpose of this measurement is to demonstrate the level of timeliness for processing and transmission of usage data delivered to the appropriate CLEC. The usage data will be mechanically transmitted or mailed to the CLEC data processing center once daily. The Timeliness interval of usage recorded by other companies is measured from the date BellSouth receives the records to the date BellSouth distributes to the CLEC. Method of delivery is at the option of the CLEC.

Calculation

Usage Data Delivery Timeliness Current month = $(a \div b) \times 100$

- a = Total number of usage records sent within six (6) calendar days from initial recording/receipt
- b = Total number of usage records sent

Report Structure

- CLEC Aggregate
- CLEC Specific
- BellSouth Aggregate
- Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report Month • Record Type <ul style="list-style-type: none"> - BellSouth Recorded - Non-BellSouth Recorded 	<ul style="list-style-type: none"> • Report Monthly • Record Type

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Region 	<ul style="list-style-type: none"> • CLEC Usage Data Delivery Timeliness is comparable to BellSouth Usage Data Delivery Timeliness

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

B5: Usage Data Delivery Timeliness

B6: Mean Time to Deliver Usage

Definition

This measurement provides the average time it takes to deliver Usage Records to a CLEC. A parity measure is also provided showing timeliness of BellSouth messages processed and transmitted via CMDS. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.

Exclusions

None

Business Rules

The purpose of this measurement is to demonstrate the average number of days it takes BellSouth to deliver Usage data to the appropriate CLEC. Usage data is mechanically transmitted or mailed to the CLEC data processing center once daily. Method of delivery is at the option of the CLEC.

Calculation

$$\text{Mean Time to Deliver Usage} = (a \times b) \div c$$

- a = Volume of Records Delivered
- b = Estimated number of days to deliver
- c = Total Record Volume Delivered

Note: Any usage record falling in the 30+ day interval will be added using an average figure of 31.5 days.

Report Structure

- CLEC Aggregate
- CLEC Specific
- BellSouth Aggregate
- Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report Month • Record Type <ul style="list-style-type: none"> - BellSouth Recorded - Non-BellSouth Recorded 	<ul style="list-style-type: none"> • Report Monthly • Record Type

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Region 	<ul style="list-style-type: none"> • Mean Time to Deliver Usage to CLEC is comparable to Mean Time to Deliver Usage to BellSouth

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

B6: Mean Time to Deliver Usage

B7: Recurring Charge Completeness

Definition

This measure captures percentage of fractional recurring charges appearing on the correct bill.

Exclusions

None

Business Rules

The effective date of the recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.

Calculation

Recurring Charge Completeness = $(a \div b) \times 100$

- a = Count of fractional recurring charges that are on the correct bill¹
- b = Total count of fractional recurring charges that are on the correct bill

¹Correct bill = next available bill

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report month • Invoice type • Total recurring charges billed • Total billed on time 	<ul style="list-style-type: none"> • Report month • Retail Analog • Total recurring charges billed • Total billed on time

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
Product/Invoice Type	
<ul style="list-style-type: none"> • Resale 	<ul style="list-style-type: none"> • Parity
<ul style="list-style-type: none"> • UNE 	<ul style="list-style-type: none"> • Benchmark 90%
<ul style="list-style-type: none"> • Interconnection 	<ul style="list-style-type: none"> • Benchmark 90%

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

B8: Non-Recurring Charge Completeness

Definition

This measure captures percentage of non-recurring charges appearing on the correct bill.

Exclusions

None

Business Rules

The effective date of the non-recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.

Calculation

Non-Recurring Charge Completeness = $(a \div b) \times 100$

- a = Count of non-recurring charges that are on the correct bill¹
- b = Total count of non-recurring charges that are on the correct bill

¹Correct bill = next available bill

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report month • Invoice type • Total non-recurring charges billed • Total billed on time 	<ul style="list-style-type: none"> • Report month • Retail Analog • Total non-recurring charges billed • Total billed on time

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
Product/Invoice Type	
<ul style="list-style-type: none"> • Resale 	<ul style="list-style-type: none"> • Parity
<ul style="list-style-type: none"> • UNE 	<ul style="list-style-type: none"> • Benchmark 90%
<ul style="list-style-type: none"> • Interconnection 	<ul style="list-style-type: none"> • Benchmark 90%

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

Section 6: Operator Services And Directory Assistance

OS-1: Speed to Answer Performance/Average Speed to Answer - Toll

Definition

Measurement of the average time in seconds calls wait before answered by a toll operator.

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

Speed to Answer Performance/Average Speed to Answer - Toll = $a \div b$

- a = Total queue time
- b = Total calls answered

Note: Total queue time includes time that answered calls wait in queue as well as time abandoned calls wait in queue prior to abandonment.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
 - State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth's Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP
- Month
- Call Type (Toll)
- Average Speed of Answer

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none">• None	<ul style="list-style-type: none">• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

OS-2: Speed to Answer Performance/Percent Answered with "X" Seconds – Toll

Definition

Measurement of the percent of toll calls that are answered in less than ten seconds

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

The Percent Answered within "X" Seconds measurement for toll is derived by using the BellCore Statistical Answer Conversion Tables, to convert the Average Speed to Answer measure into a percent of calls answered within "X" seconds. The BellCore Conversion Tables are specific to the defined parameters of work time, number of operators, max queue size and call abandonment rates.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
 - State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth's Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP
- Month
- Call Type (Toll)
- Average Speed of Answer

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation:	Retail Analog/Benchmark:
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

DA-1: Speed to Answer Performance/Average Speed to Answer – Directory Assistance (DA)

Definition

Measurement of the average time in seconds calls wait before answered by a DA operator.

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

Speed to Answer Performance/Average Speed to Answer – Directory Assistance (DA) = $a \div b$

- a = Total queue time
- b = Total calls answered

Note: Total queue time includes time that answered calls wait in queue as well as time abandoned calls wait in queue prior to abandonment.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
 - State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth’s Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP
- Month
- Call Type (DA)
- Average Speed of Answer

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

DA-2: Speed to Answer Performance/Percent Answered within “X” Seconds – Directory Assistance (DA)

DA-2: Speed to Answer Performance/Percent Answered within “X” Seconds – Directory Assistance (DA)

Definition

Measurement of the percent of DA calls that are answered in less than twelve seconds.

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

The Percent Answered within “X” Seconds measurement for DA is derived by using the BellCore Statistical Answer Conversion Tables, to convert the Average Speed to Answer measure into a percent of calls answered within “X” seconds. The BellCore Conversion Tables are specific to the defined parameters of work time, number of operators, max queue size and call abandonment rates.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
- State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth’s Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP.
- Month
- Call Type (DA)
- Average Speed of Answer

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 7: Database Update Information

D-1: Average Database Update Interval

Definition

This report measures the interval from receipt of the database change request to the completion of the update to the database for Line Information Database (LIDB), Directory Assistance and Directory Listings.

Exclusions

- Updates Canceled by the CLEC
- Initial update when supplemented by CLEC
- BellSouth updates associated with internal or administrative use of local services.

Business Rules

The interval for this measure begins with the date and time stamp when a service order is completed and the completion notice is released to all systems to be updated with the order information including Directory Assistance, Directory Listings, and Line Information Database (LIDB). The end time stamp is the date and time of completion of updates to the system.

For BellSouth Results:

The BellSouth computation is identical to that for the CLEC with the clarifications noted below.

Other Clarifications and Qualification:

- For LIDB, the elapsed time for a BellSouth update is measured from the point in time when the BellSouth file maintenance process makes the LIDB update information available until the date and time reported by BellSouth that database updates are completed.
- Results for the CLECs are captured and reported at the update level by Reporting Dimension (see below).
- The Completion Date is the date upon which BellSouth issues the Update Completion Notice to the CLEC.
- If the CLEC initiates a supplement to the originally submitted update and the supplement reflects changes in customer requirements (rather than responding to BellSouth initiated changes), then the update submission date and time will be the date and time of BellSouth receipt of a syntactically correct update supplement. Update activities responding to BellSouth initiated changes will not result in changes to the update submission date and time used for the purposes of computing the update completion interval.
- Elapsed time is measured in hours and hundredths of hours rounded to the nearest tenth of an hour.
- Because this should be a highly automated process, the accumulation of elapsed time continues through off-schedule, weekends and holidays; however, scheduled maintenance windows are excluded.

Calculation

Update Interval = (a - b)

- a = Completion Date & Time of Database Update
- b = Submission Date and Time of Database Change

Average Update Interval = (c ÷ d)

- c = Sum of all Update Intervals
- d = Total Number of Updates Completed During Reporting Period

Report Structure

- CLEC Specific (Under development)
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• (Under Development)	• (Under Development)

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation:	Retail Analog/Benchmark:
Database Type <ul style="list-style-type: none"> • LIDB • Directory Listings • Directory Assistance 	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

D-2: Percent Database Update Accuracy

Definition

This report measures the accuracy of database updates by BellSouth for Line Information Database (LIDB) Directory Assistance and Directory Listings using a statistically valid sample of LSRs/Orders in a manual review. This manual review is not conducted on BellSouth Retail Orders.

Exclusions

- Updates canceled by the CLEC
- Initial update when supplemented by CLEC
- CLEC orders that had CLEC errors
- BellSouth updates associated with internal or administrative use of local services.

Business Rules

For each update completed during the reporting period, the original update that the CLEC sent to BellSouth is compared to the database following completion of the update by BellSouth. An update is “completed without error” if the database completely and accurately reflects the activity specified on the original and supplemental update (e.g., orders) submitted by the CLEC. Each database (e.g., LIDB, Directory Assistance and Directory Listings) should be separately tracked and reported.

A statistically valid sample of CLEC Orders will be pulled each month. The sample will be used to test the accuracy of the database update process. This is a manual process.

Calculation

$$\text{Percent Update Accuracy} = (a \div b) \times 100$$

- a = Number of Updates Completed Without Error
- b = Number Updates Completed

Report Structure

- CLEC Aggregate
- CLEC Specific (not available in this report)
- BellSouth Aggregate (not available in this report)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> • Report Month • CLEC Order Number (so_nbr) and PON (PON) • Local Service Request (LSR) • Order Submission Date • Number of Orders Reviewed <p>Note: Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark:
Database Type <ul style="list-style-type: none"> • LIDB • Directory Database 	<ul style="list-style-type: none"> • 95% Accurate

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

D-3: Percent NXXs and LRNs Loaded by the LERG Effective Date

Definition

Measurement of the percent of NXX(s) and Location Routing Numbers LRN(s) loaded and tested in new end office and/or tandem switches by the Local Exchange Routing Guide (LERG) effective date when facilities are in place. BellSouth has a single provisioning process for both NXX(s) and LRN(s). In this measure BellSouth will identify whether or not a particular NXX has been flagged as LNP capable (set triggers for dips) by the LERG effective date.

An LRN is assigned by the owner of the switch and is placed into the software translations for every switch to be used as an administrative pointer to route NXX(s) in LNP capable switches. The LRN is a result of Local Number Porting and is housed in a national database provided by the Number Portability Administration Center (NPAC). The switch owner is responsible for notifying NPAC and requesting the effective date that will be reflected in the LERG. The national database downloads routing tables into BellSouth's Service Control Point (SCP) regional databases, which are queried by switches when routing ported numbers.

The basic NXX routing process includes the addition of all NXX(s) in the response translations. This addition to response translations is what supports LRN routing. Routing instructions for all NXX(s), including LRN(s), are received from the Advance Routing & Trunking System (ARTS) and all routing, including response, is established based on the information contained in the Translation Work Instructions (TWINs) document.

Exclusions

- Activation requests where the CLEC's interconnection arrangements and facilities are not in place by the LERG effective date.
- Expedite requests

Business Rules

Data for the initial NXX(s) and LRN(s) in a local calling area will be based on the LERG effective date or completion of the initial interconnection trunk group(s), whichever is longer. Data for additional NXX(s) in the local calling area will be based on the LERG effective date. The LERG effective date is loaded into the system at the request of the CLEC. It is contingent upon the CLEC to engineer, order, and install interconnection arrangements and facilities prior to that date.

The total Count of NXX(s) and LRN(s) that were scheduled to be loaded and those that were loaded by the LERG effective date in BellSouth switches will be captured in the Work Force Administration -Dispatch In database.

Calculation

Percent NXXs/LRNs Loaded and Tested Prior to the LERG Effective Date = $(a \div b) \times 100$

- a = Count of NXXs and LRNs loaded by the LERG effective date
- b = Total NXXs and LRNs to be scheduled and loaded by the LERG effective date

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth (Not Applicable)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Company Name • Company Code • NPA/NXX • LERG Effective Date • Loaded Date 	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • Geographic scope - Region 	<ul style="list-style-type: none"> • 100% by LERG effective date

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • Not Applicable 	<ul style="list-style-type: none"> • Not Applicable

D-3: Percent NXXs and LRNs Loaded by the LERG Effective Date

Section 8: E911

E-1: Timeliness

Definition

Measures the percent of batch orders for E911 database updates (to CLEC resale and BellSouth retail records) processed successfully within a 24-hour period.

Exclusions

- Any resale order canceled by a CLEC
- Facilities-based CLEC orders

Business Rules

The 24-hour processing period is calculated based on the date and time processing starts on the batch orders and the date and time processing stops on the batch orders. Mechanical processing starts when SCC (the BellSouth E911 vendor) receives E911 files containing batch orders extracted from the BellSouth Service Order Control System (SOCS). Processing stops when SCC loads the individual records to the E911 database. The E911 database includes updates to the Automatic Location Identification (ALI) database. The system makes no distinction between CLEC resale records and BellSouth retail records.

Calculation

$$\text{E911 Timeliness} = (a \div b) \times 100$$

- a = Number of batch orders processed within 24 hours
- b = Total number of batch orders submitted

Report Structure

Reported for the aggregate of CLEC resale updates and BellSouth retail updates

- State
- Region

Data Retained

- Report month
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

E-1: Timeliness

E-2: Accuracy

Definition

Measures the percent of E911 telephone number (TN) record updates (to CLEC resale and BellSouth retail records) processed successfully for E911 (including the Automatic Location Identification (ALI) database).

Exclusions

- Any resale order canceled by a CLEC
- Facilities-based CLEC orders

Business Rules

Accuracy is based on the number of records processed without error at the conclusion of the processing cycle. Mechanical processing starts when SCC (the BellSouth E911 vendor) receives E911 files containing telephone number (TN) records extracted from BellSouth's Service Order Control System (SOCS). The system makes no distinction between CLEC resale records and BellSouth retail records.

Calculation

$$\text{E911 Accuracy} = (a \div b) \times 100$$

- a = Number of record individual updates processed with no errors
- b = Total number of individual record updates

Report Structure

Reported for the aggregate of CLEC resale updates and BellSouth retail updates

- State
- Region

Data Retained

- Report month
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

E-3: Mean Interval

Definition

Measures the mean interval processing of E911 batch orders (to update CLEC resale and BellSouth retail records) including processing against the Automatic Location Identification (ALI) database.

Exclusions

- Any resale order canceled by a CLEC
- Facilities-based CLEC orders

Business Rules

The processing period is calculated based on the date and time processing starts on the batch orders and the date and time processing stops on the batch orders. Data is posted in 4-hour increments up to and beyond 24 hours. The system makes no distinction between CLEC resale records and BellSouth retail records.

Calculation

$$\text{E911 Interval} = (a - b)$$

- a = Date and time of batch order completion
- b = Date and time of batch order submission

$$\text{E911 Mean Interval} = (c \div d)$$

- c = Sum of all E911 Intervals
- d = Number of batch orders completed

Report Structure

Reported for the aggregate of CLEC resale updates and BellSouth retail updates

- State
- Region

Data Retained

- Report month
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 9: Trunk Group Performance

TGP-1: Trunk Group Performance-Aggregate

Definition

The Trunk Group Performance report displays, over a reporting cycle, aggregate, average trunk group blocking data for each hour of each day of the reporting cycle, for both CLEC affecting and BellSouth affecting trunk groups.

Exclusions

- Trunk Groups for which valid data is not available for an entire study period
- Duplicate trunk group information

Business Rules

The purpose of the Trunk Group Performance Report is to provide trunk blocking measurements on CLEC and BellSouth trunk groups for comparison only. It is not the intent of the report that it be used for network management and/or engineering.

Monthly Average Blocking:

- The reporting cycle includes both business and non-business days in a calendar month.
- Monthly average blocking values are calculated for each trunk group for each of the 24 time consistent hours across a reporting cycle.

Aggregate Monthly Blocking:

- Used to compare aggregate blocking across trunk groups which terminate traffic at CLEC points of presence versus BellSouth switches.
- Aggregate monthly blocking data is calculated for each hour of the day across all trunk groups assigned to a category.

Trunk Categorization:

This report displays, over a reporting cycle, aggregate, average blocking data for each hour of a day. Therefore, for each reporting cycle, 24 blocking data points are generated for two aggregate groups of selected trunk groups. These groups are CLEC affecting and BellSouth affecting trunk groups. In order to assign trunk groups to each aggregate group, all trunk groups are first assigned to a category. A trunk group's end points and the type of traffic that is transmitted on it define a category. Selected categories of trunk groups are assigned to the aggregate groups so that trunk reports can be generated. The categories to which trunk groups have been assigned for this report are as follows.

CLEC Affecting Categories:

	Point A	Point B
Category 1:	BellSouth End Office	BellSouth Access Tandem
Category 3:	BellSouth End Office	CLEC Switch
Category 4:	BellSouth Local Tandem	CLEC Switch
Category 5:	BellSouth Access Tandem	CLEC Switch
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

BellSouth Affecting Categories:

	Point A	Point B
Category 9:	BellSouth End Office	BellSouth End Office

Calculation

Monthly Average Blocking:

- For each hour of the day, each day's raw data are summed across all valid measurements days in a report cycle for blocked and attempted calls.
- The sum of the blocked calls is divided by the total number of calls attempted in a reporting period.

Aggregate Monthly Blocking:

- For each hour of the day, the monthly sums of the blocked and attempted calls from each trunk group are separately aggregated over all trunk groups within each assigned category.
- The total blocked calls is divided by the total call attempts within a group to calculate an aggregate monthly blocking for each assigned group.
- The result is an aggregate monthly average blocking value for each of the 24 hours by group.
- The difference between the CLEC and BellSouth affecting trunk groups are also calculated for each hour.

Report Structure

- CLEC Aggregate
- BellSouth Aggregate
 - State

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Total Trunk Groups • Number of Trunk Groups by CLEC • Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group 	<ul style="list-style-type: none"> • Report Month • Total Trunk Groups • Aggregate Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
<ul style="list-style-type: none"> • CLEC aggregate • BellSouth aggregate 	<ul style="list-style-type: none"> • Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark:
<ul style="list-style-type: none"> • CLEC aggregate • BellSouth aggregate 	<ul style="list-style-type: none"> • Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs and 9 for BellSouth

TGP-2: Trunk Group Performance-CLEC Specific

Definition

The Trunk Group Performance report displays, over a reporting cycle, aggregate, average trunk group blocking data for each hour of each day of the reporting cycle, for both CLEC affecting and BellSouth affecting trunk groups.

Exclusions

- Trunk Groups for which valid data is not available for an entire study period
- Duplicate trunk group information

Business Rules

The purpose of the Trunk Group Performance Report is to provide trunk blocking measurements on CLEC and BellSouth trunk groups for comparison only. It is not the intent of the report that it be used for network management and/or engineering.

Monthly Average Blocking:

- The reporting cycle includes both business and non-business days in a calendar month.
- Monthly average blocking values are calculated for each trunk group for each of the 24 time consistent hours across a reporting cycle.

Aggregate Monthly Blocking:

- Used to compare aggregate blocking across trunk groups which terminate traffic at CLEC points of presence versus BellSouth switches.
- Aggregate monthly blocking data is calculated for each hour of the day across all trunk groups assigned to a category.

Trunk Categorization:

- This report displays, over a reporting cycle, aggregate, average blocking data for each hour of a day. Therefore, for each reporting cycle, 24 blocking data points are generated for two aggregate groups of selected trunk groups. These groups are CLEC affecting and BellSouth affecting trunk groups. In order to assign trunk groups to each aggregate group, all trunk groups are first assigned to a category. A trunk group's end points and the type of traffic that is transmitted on it define a category. Selected categories of trunk groups are assigned to the aggregate groups so that trunk reports can be generated. The categories to which trunk groups have been assigned for this report are as follows.

CLEC Affecting Categories:

	Point A	Point B
Category 1:	BellSouth End Office	BellSouth Access Tandem
Category 3:	BellSouth End Office	CLEC Switch
Category 4:	BellSouth Local Tandem	CLEC Switch
Category 5:	BellSouth Access Tandem	CLEC Switch
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

BellSouth Affecting Categories:

	Point A	Point B
Category 9:	BellSouth End Office	BellSouth End Office

Calculation:

Monthly Average Blocking:

- For each hour of the day, each day's raw data are summed across all valid measurements days in a report cycle for blocked and attempted calls.
- The sum of the blocked calls is divided by the total number of calls attempted in a reporting period.

Aggregate Monthly Blocking:

- For each hour of the day, the monthly sums of the blocked and attempted calls from each trunk group are separately aggregated over all trunk groups within each assigned category.
- The total blocked calls is divided by the total call attempts within a group to calculate an aggregate monthly blocking for each assigned group.
- The result is an aggregate monthly average blocking value for each of the 24 hours by group.
- The difference between the CLEC and BellSouth affecting trunk groups are also calculated for each hour.

Report Structure

- CLEC Specific
 - State

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Report Month • Total Trunk Groups • Number of Trunk Groups by CLEC • Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group 	<ul style="list-style-type: none"> • Report Month • Total Trunk Groups • Aggregate Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
<ul style="list-style-type: none"> • CLEC trunk group 	<ul style="list-style-type: none"> • Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark:
<ul style="list-style-type: none"> • CLEC trunk group • BellSouth trunk group 	<ul style="list-style-type: none"> • Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth

Section 10: Collocation

C-1: Collocation Average Response Time

Definition

Measures the average time (counted in calendar days) from the receipt of a complete and accurate collocation application (including receipt of application fee if required) to the date BellSouth returns a response electronically or in writing. Within 10 calendar days after having received a bona fide application for physical collocation, BellSouth must respond as to whether space is available or not.

Exclusions

Any application canceled by the CLEC

Business Rules

The clock starts on the date that BellSouth receives a complete and accurate collocation application accompanied by the appropriate application fee if required. The clock stops on the date that BellSouth returns a response. The clock will restart upon receipt of changes to the original application request.

Calculation

Response Time = (a - b)

- a = Request Response Date
- b = Request Submission Date

Average Response Time = (c ÷ d)

- c = Sum of all Response Times
- d = Count of Responses Returned within Reporting Period

Report Structure

- Individual CLEC (alias) aggregate
- Aggregate of all CLECs

Data Retained

- Report period
- Aggregate data

SQM Disaggregation - Analog/Benchmark

Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none">• State• Virtual-Initial• Virtual-Augment• Physical Caged-Initial• Physical Caged-Augment• Physical-Cageless-Initial• Physical Cageless-Augment	<ul style="list-style-type: none">• Virtual - 15 Calendar Days• Physical Caged - 15 Calendar Days• Physical Cageless - 15 Calendar Days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

C-2: Collocation Average Arrangement Time

Definition

Measures the average time (counted in calendar days) from receipt of a complete and accurate Bona Fide firm order (including receipt of appropriate fee if required) to the date BellSouth completes the collocation arrangement and notifies the CLEC.

Exclusions

Any Bona Fide firm order canceled by the CLEC

Business Rules

The clock starts on the date that BellSouth receives a complete and accurate Bone Fide firm order accompanied by the appropriate fee. The clock stops on the date that BellSouth completes the collocation arrangement and notifies the CLEC.

Calculation

Arrangement Time = (a - b)

- a = Date Collocation Arrangement is Complete
- b = Date Order for Collocation Arrangement Submitted

Average Arrangement Time = (c ÷ d)

- c = Sum of all Arrangement Times
- d = Total Number of Collocation Arrangements Completed during Reporting Period.

Report Structure

- Individual CLEC (alias) aggregate
- Aggregate of all CLECs

Data Retained

- Report period
- Aggregate data

SQM Disaggregation - Retail Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • State • Virtual-Initial • Virtual-Augment • Physical Caged-Initial • Physical Caged-Augment • Physical Cageless-Initial • Physical Cageless-Augment 	<ul style="list-style-type: none"> • Virtual - 60 Calendar Days • Virtual-Augment - 45 Calendar Days (Without Space Increase) • Virtual-Augment - 60 Calendar Days (With Space Increase) • Physical Caged - 90 Calendar Days • Physical Caged-Augment - 45 Calendar Days (Without Space Increase) • Physical Caged-Augment - 90 Calendar Days (With Space Increase) • Physical Cageless - 90 Calendar Days • Physical Cagedless-Augment - 45 Calendar Days (Without Space Increase) • Physical Cagedless-Augment - 90 Calendar Days (With Space Increase)

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark:
• Not Applicable	• Not Applicable

C-2: Collocation Average Arrangement Time

C-3: Collocation Percent of Due Dates Missed

Definition

Measures the percent of missed due dates for both virtual and physical collocation arrangements.

Exclusions

Any Bona Fide firm order canceled by the CLEC

Business Rules

Percent Due Dates Missed is the percent of total collocation arrangements which BellSouth is unable to complete by end of the BellSouth committed due date. The clock starts on the date that BellSouth receives a complete and accurate Bona Fide firm order accompanied by the appropriate fee if required. The arrangement is considered a missed due date if it is not completed on or before the committed due date.

Calculation

% of Due Dates Missed = $(a \div b) \times 100$

- a = Number of Completed Orders that were not completed within BellSouth Committed Due Date during Reporting Period
- b = Number of Orders Completed in Reporting Period

Report Structure

- Individual CLEC (alias) aggregate
- Aggregate of all CLECs

Data Retained

- Report period
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • State • Virtual-Initial • Virtual-Augment • Physical Caged-Initial • Physical Caged-Augment • Physical Cageless-Initial • Physical Cageless-Augment 	<ul style="list-style-type: none"> • $\geq 90\%$ on time

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> • All Collocation Arrangements 	<ul style="list-style-type: none"> • $\geq 90\%$ on time.

Section 11: Change Management

CM-1: Timeliness of Change Management Notices

Definition

Measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change.

Exclusions

- Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes. For example: a patch to fix a software problem.
- Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP)

Business Rules

This metric is designed to measure the percent of change management notices sent to the CLECs according to notification standards and time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

The clock starts on the notification date. The clock stops on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. A revised notification would be required and the clock would restart. Based on release constraints for defects/expedites, notification may be less than the agreed upon interval in the CCP for new features.

Calculation

Timeliness of Change Management Notices = $(a \div b) \times 100$

- a = Total number of Change Management Notifications Sent Within Required Time frames
- b = Total Number of Change Management Notifications Sent

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• Region	• 95% \geq 30 days of Release

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% \geq 30 days of Release

CM-1: Timeliness of Change Management Notices

CM-2: Change Management Notice Average Delay Days

Definition

Measures the average delay days for change management system release notices sent outside the time frame set forth in the Change Control Process.

Exclusions

- Changes to release dates for reasons outside BellSouth control, such as the system vendor
- Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process

Business Rules

This metric is designed to measure the percent of change management notices sent to the CLECs according to notification standards and time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

The clock starts on the notification due date. The clock stops on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. A revised notification would be required and the clock would restart. Based on release constraints for defects/expedites, notification may be less than the agreed upon interval in the CCP for new features.

Calculation

Change Management Notice Delay Days = (a - b)

- a = Date Notice Sent
- b = Date Notice Due

Change Management Notice Average Delay Days = (c ÷ d)

- c = Sum of all Change Management Notice Delay Days
- d = Total Number of Notices Sent Late

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation:	Retail Analog/Benchmark:
• Region	• 90% ≤ 8 Days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-3: Timeliness of Documents Associated with Change

Definition

Measures whether CLECs received requirements or business rule documentation on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change.

Exclusions

- Documentation for release dates that slip less than 30 days for reasons outside BellSouth control, such as changes due to Regulatory mandate or CLEC request.
- Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process.

Business Rules

This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to documentation standards and time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

The clock starts on the business rule documentation release date. The clock stops on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. Revisions to documentation could be required and the clock would restart.

Calculation

Timeliness of Documents Associated with Change = $(a \div b) \times 100$

- a = Change Management Documentation Sent Within Required Time frames after Notices
- b = Total Number of Change Management Documentation Sent

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Region	<ul style="list-style-type: none"> • 95% ≥ 30 days if new features coding is required • 95% ≥ 5 days for documentation defects, corrections or clarifications

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% ≥ 30 days of the change

CM-4: Change Management Documentation Average Delay Days

Definition

Measures the average delay days for requirements or business rule documentation sent outside the time frames set forth in the Change Control Process.

Exclusions

- Documentation for release dates that slip less than 30 days for reasons outside BellSouth control, such as changes due to Regulatory mandate or CLEC request.
- Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process.

Business Rules

This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to documentation standards and time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

The clock starts on the business rule documentation release date. The clock stops on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. Revisions to documentation could be required and the clock would restart.

Calculation

Change Management Documentation Delay Days = (a - b)

- a = Date Documentation Provided
- b = Date Documentation Due

Change Management Documentation Average Delay Days = (c ÷ d)

- c = Sum of all CM Documentation Delay Days
- d = Total Change Management Documents Sent

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• Region	• 90% ≤ 8 Days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-4: Change Management Documentation Average Delay Days

CM-5: Notification of CLEC Interface Outages

Definition

Measures the time it takes BellSouth to notify the CLEC of an outage of an interface.

Exclusions

None

Business Rules

This measure is designed to notify the CLEC of interface outages within 15 minutes of BellSouth's verification that an outage has taken place. This metric will be expressed as a percentage.

Calculation

Notification of CLEC Interface Outages = $(a \div b) \times 100$

- a = Number of Interface Outages where CLECS are notified within 15 minutes
- b = Total Number of Interface Outages

Report Structure

- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> • Number of Interface Outages • Number of Notifications \leq 15 minutes 	<ul style="list-style-type: none"> • Not Applicable

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none"> • By interface type for all interfaces accessed by CLECs 	<ul style="list-style-type: none"> • 97% in 15 Minutes

Interface	Applicable to
EDI	CLEC
CSOTS	CLEC
LENS	CLEC
TAG	CLEC
ECTA	CLEC
TAFI	CLEC/BellSouth

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-5: Notification of CLEC Interface Outages

Appendix A: Reporting Scope

A-1: Standard Service Groupings

See individual reports in the body of the SQM.

A-2: Standard Service Order Activities

These are the generic BellSouth/CLEC service order activities which are included in the Pre-Ordering, Ordering, and Provisioning sections of this document. It is not meant to indicate specific reporting categories.

Service Order Activity Types

- Service Migrations Without Changes
- Service Migrations With Changes
- Move and Change Activities
- Service Disconnects (Unless noted otherwise)
- New Service Installations

Pre-Ordering Query Types

- Address
- Telephone Number
- Appointment Scheduling
- Customer Service Record
- Feature Availability
- Service Inquiry

Maintenance Query Types:

TAFI - TAFI queries the systems below

- CRIS
- March
- Predictor
- LMOS
 - DLR
 - DLETH
 - LMOSupd
- LNP
- NIW
- OSPCM
- SOCS

Report Levels

- CLEC RESH
- CLEC State
- CLEC Region
- Aggregate CLEC State

- Aggregate CLEC Region
- BellSouth State
- BellSouth Region

Appendix B: Glossary of Acronyms and Terms

Symbols used in calculations

- Σ A mathematical symbol representing the sum of a series of values following the symbol.
- A mathematical operator representing subtraction.
- + A mathematical operator representing addition.
- \div A mathematical operator representing division.
- () Parentheses, used to group mathematical operations which are completed before operations outside the parentheses.

A

ACD: Automatic Call Distributor - A service that provides status monitoring of agents in a call center and routes high volume incoming telephone calls to available agents while collecting management information on both callers and attendants.

Aggregate: Sum total of all items in like category, e.g. CLEC aggregate equals the sum total of all CLECs' data for a given reporting level.

ALEC: Alternative Local Exchange Company = FL CLEC

ADSL: Asymmetrical Digital Subscriber Line

ASR: Access Service Request - A request for access service terminating delivery of carrier traffic into a Local Exchange Carrier's network.

ATLAS: Application for Telephone Number Load Administration System - The BellSouth Operations System used to administer the pool of available telephone numbers and to reserve selected numbers from the pool for use on pending service requests/service orders.

ATLASTN: ATLAS software contract for Telephone Number.

Auto Clarification: The number of LSRs that were electronically rejected from LESOG and electronically returned to the CLEC for correction.

B

BFR: Bona Fied Request

BILLING: The process and functions by which billing data is collected and by which account information is processed in order to render accurate and timely billing.

BOCRIS: Business Office Customer Record Information System (Front-end to the CRIS database.)

BRI: Basic Rate ISDN

BRC: Business Repair Center – The BellSouth Business Systems trouble receipt center which serves large business and CLEC customers.

BellSouth : BellSouth Telecommunications, Inc.

C

CABS: Carrier Access Billing System

CCC: Coordinated Customer Conversions

CCP: Change Control Process

Centrex: A business telephone service, offered by local exchange carriers, which is similar to a Private Branch Exchange (PBX) but the switching equipment is located in the telephone company Central Office (CO).

CKTID: A unique identifier for elements combined in a service configuration

CLEC: Competitive Local Exchange Carrier

CLP: Competitive Local Provider = NC CLEC

CM: Change Management

CMDS: Centralized Message Distribution System - Telcordia administered national system used to transfer specially formatted messages among companies.

COFFI: Central Office Feature File Interface - Provides information about USOCs and class of service. COFFI is a part of DOE/SONGS. It indicates all services available to a customer.

CRIS: Customer Record Information System - The BellSouth proprietary corporate database and billing system for non-access customers and services.

CRSACCTS: CRIS software contract for CSR information

CRSG: Complex Resale Support Group

C-SOTS: CLEC Service Order Tracking System

CSR: Customer Service Record

CTTG: Common Transport Trunk Group - Final trunk groups between BellSouth & Independent end offices and the BellSouth access tandems.

D

DA: Directory Assistance

DESIGN: Design Service is defined as any Special or Plain Old Telephone Service Order which requires BellSouth Design Engineering Activities.

DISPOSITION & CAUSE: Types of trouble conditions, e.g. No Trouble Found, Central Office Equipment, Customer Premises Equipment, etc.

DLETH: Display Lengthy Trouble History - A history report that gives all activity on a line record for trouble reports in LMOS.

DLR: Detail Line Record - All the basic information maintained on a line record in LMOS, e.g. name, address, facilities, features etc.

DS-0: The worldwide standard speed for one digital voice signal (64000 bps).

DS-1: 24 DS-0s (1.544Mb/sec., i.e. carrier systems)

DOE: Direct Order Entry System - An internal BellSouth service order entry system used by BellSouth Service Representatives to input business service orders in BellSouth format.

DSAP: DOE (Direct Order Entry) Support Application - The BellSouth Operations System which assists a Service Representative or similar carrier agent in negotiating service provisioning commitments for non-designed services and Unbundled Network Elements.

DSAPDDI: DSAP software contract for schedule information.

DSL: Digital Subscriber Line

DUI: Database Update Information

E

E911: Provides callers access to the applicable emergency services bureau by dialing a 3-digit universal telephone number.

EDI: Electronic Data Interchange - The computer-to-computer exchange of inter and/or intra-company business documents in a public standard format.

ESSX: BellSouth Centrex Service

F

Fatal Reject: The number of LSRs that were electronically rejected from LEO, which checks to see if the LSR has all the required fields correctly populated.

Flow-Through: In the context of this document, LSRs submitted electronically via the CLEC mechanized ordering process that flow through to the BellSouth OSS without manual or human intervention.

FOC: Firm Order Confirmation - A notification returned to the CLEC confirming that the LSR has been received and accepted, including the specified commitment date.

FX: Foreign Exchange

G

H

HAL: "Hands Off" Assignment Logic - Front end access and error resolution logic used in interfacing BellSouth Operations Systems such as ATLAS, BOCRIS, LMOS, PSIMS, RSAG and SOCS.

HALCRIS: HAL software contract for CSR information

HDSL: High Density Subscriber Loop/Line

I

ILEC: Incumbent Local Exchange Company

INP: Interim Number Portability

ISDN: Integrated Services Digital Network

IPC: Interconnection Purchasing Center

L

LAN: Local Area Network

LAUTO: The automatic processor in the LNP Gateway that validates LSRs and issues service orders.

LCSC: Local Carrier Service Center - The BellSouth center which is dedicated to handling CLEC LSRs, ASRs, and Pre-ordering transactions along with associated expedite requests and escalations.

Legacy System: Term used to refer to BellSouth Operations Support Systems (see OSS)

LENS: Local Exchange Negotiation System - The BellSouth LAN/web server/OS application developed to provide both preordering and ordering electronic interface functions for CLECs.

LEO: Local Exchange Ordering - A BellSouth system which accepts the output of EDI, applies edit and formatting checks, and reformats the Local Service Requests in BellSouth Service Order format.

LERG: Local Exchange Routing Guide

LESOG: Local Exchange Service Order Generator - A BellSouth system which accepts the service order output of LEO and enters the Service Order into the Service Order Control System using terminal emulation technology.

LFACS: Loop Facilities Assessment and Control System

LIDB: Line Information Database

LMOS: Loop Maintenance Operations System - A BellSouth Operations System that stores the assignment and selected account information for use by downstream OSS and BellSouth personnel during provisioning and maintenance activities.

LMOS HOST: LMOS host computer

LMOSupd: LMOS updates

LMU: Loop Make-up

LMUS: Loop Make-up Service Inquiry

LNP: Local Number Portability - In the context of this document, the capability for a subscriber to retain his current telephone number as he transfers to a different local service provider.

LOOPS : Transmission paths from the central office to the customer premises.

LRN: Location Routing Number

LSR: Local Service Request – A request for local resale service or unbundled network elements from a CLEC.

M

Maintenance & Repair: The process and function by which trouble reports are passed to BellSouth and by which the related service problems are resolved.

MARCH: BellSouth Operations System which accepts service orders, interprets the coding contained in the service order image, and constructs the specific switching system Recent Change command messages for input into end office switches.

N

NBR: New Business Request

NC: "No Circuits" - All circuits busy announcement.

NIW: Network Information Warehouse

NMLI: Native Mode LAN Interconnection

NPA: Numbering Plan Area

NXX: The "exchange" portion of a telephone number.

O

OASIS: Obtain Availability Services Information System - A BellSouth front-end processor, which acts as an interface between COFFI and RNS. This system takes the USOCs in COFFI and translates them to English for display in RNS.

OASISBSN: OASIS software contract for feature/service

OASISCAR: OASIS software contract for feature/service

OASISLPC: OASIS software contract for feature/service

OASISMTN: OASIS software contract for feature/service

OASISNET: OASIS software contract for feature/service

OASISOCP: OASIS software contract for feature/service

ORDERING: The process and functions by which resale services or unbundled network elements are ordered from BellSouth as well as the process by which an LSR or ASR is placed with BellSouth.

OSPCM: Outside Plant Contract Management System - Provides Scheduling Information.

OSS: Operations Support System - A support system or database which is used to mechanize the flow or performance of work. The term is used to refer to the overall system consisting of hardware complex, computer operating system(s), and application which is used to provide the support functions.

OUT OF SERVICE: Customer has no dial tone and cannot call out.

P

PMAP: Performance Measurement Analysis Platform

PON: Purchase Order Number

POTS: Plain Old Telephone Service

PREDICTOR: The BellSouth Operations system which is used to administer proactive maintenance and rehabilitation activities on outside plant facilities, provide access to selected work groups (e.g. RRC & BRC) to Mechanized Loop Testing and switching system I/O ports, and provide certain information regarding the attributes and capabilities of outside plant facilities.

Preordering: The process and functions by which vital information is obtained, verified, or validated prior to placing a service request.

PRI: Primary Rate ISDN

Provisioning: The process and functions by which necessary work is performed to activate a service requested via an LSR or ASR and to initiate the proper billing and accounting functions.

PSIMS: Product/Service Inventory Management System - A BellSouth database Operations System which contains availability information on switching system features and capabilities and on BellSouth service availability. This database is used to verify the availability of a feature or service in an NXX prior to making a commitment to the customer.

PSIMSORB: PSIMS software contract for feature/service.

Q

R

RNS: Regional Negotiation System - An internal BellSouth service order entry system used by BellSouth Consumer Services to input service orders in BellSouth format.

ROS: Regional Ordering System

RRC: Residence Repair Center - The BellSouth Consumer Services trouble receipt center which serves residential customers.

RSAG: Regional Street Address Guide - The BellSouth database, which contains street addresses validated to be accurate with state and local governments.

RSAGADDR: RSAG software contract for address search.

RSAGTN: RSAG software contract for telephone number search.

S

SAC: Service Advocacy Center

SEEM: Self Effectuating Enforcement Mechanism

SOCS: Service Order Control System - The BellSouth Operations System which routes service order images among BellSouth drop points and BellSouth Operations Systems during the service provisioning process.

SOIR: Service Order Interface Record - any change effecting activity to a customer account by service order that impacts 911/E911

SONGS: Service Order Negotiation and Generation System.

T

TAFI: Trouble Analysis Facilitation Interface - The BellSouth Operations System that supports trouble receipt center personnel in taking and handling customer trouble reports.

TAG: Telecommunications Access Gateway – TAG was designed to provide an electronic interface, or machine-to-machine interface for the bi-directional flow of information between BellSouth’s OSSs and participating CLECs.

TN: Telephone Number

Total Manual Fallout: The number of LSRs which are entered electronically but require manual entering into a service order generator.

U

UNE: Unbundled Network Element

UCL: Unbundled Copper Link

USOC: Universal Service Order Code

V**W**

WATS: Wide Area Telephone Service

WFA: Work Force Administration

WMC: Work Management Center

WTN: Working Telephone Number.

X**Y****Z**

Appendix C: BellSouth Audit Policy

C-1: BellSouth's Internal Audit Policy

BellSouth's internal efforts to make certain that the reports produced by the PMAP platform are of the highest accuracy has been formalized into a Performance Measurements Quality Assurance Plan (PMQAP) that documents and augments existing quality assurance processes integral to the production and validation of Performance Measurements data.

The plan consists of three sections:

1. Change Control addresses the quality assurance steps involved in the introduction of new measurements and changes to existing measurements.
2. Production addresses the quality assurance steps used to create monthly SQM reports.
3. Monthly Validation addresses the quality assurance steps used to ensure accurate posting of monthly results.

The BellSouth PMQAP will ensure that BellSouth effectively and consistently provides accurate performance measurements data for the activities included in the SQM. The BellSouth Internal Audit department will audit this plan and its quality assurance steps annually, beginning in 4Q01.

C-2: BellSouth's External Audit Policy

BellSouth currently provides many CLECs with audit rights as a part of their individual interconnection agreements. BellSouth has developed a proposed Audit Plan for use by the parties to an audit. If requested by a Public Service Commission or by a CLEC exercising contractual audit rights, BellSouth will agree to undergo a comprehensive audit of the current year aggregate level reports for both BellSouth and the CLECs for each of the next five (5) years (2001 - 2005), to be conducted by an independent third party auditor. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. Requested audits include the following specifications:

1. The cost shall be borne 50% by BellSouth and 50% by the CLECs.
2. The independent third party auditor shall be selected with input from BellSouth, the PSC, if applicable, and the CLEC(s).
3. BellSouth, the PSC and the CLECs shall jointly determine the scope of the audit.

These comprehensive audits are intended to provide the basis for the PSCs and CLECs to determine that the SQM and PMAP produce accurate data that reflects each States Order for performance measurements. Once this has been verified by an initial audit, the BellSouth PMQAP will provide the basis for future audits.

BellSouth's Performance Measurements Analysis Platform ("PMAP")

In connection with the development of the Service Quality Measurements (SQMs) in early 1998, BellSouth began designing the system that would be used to collect, process, and report performance data to correspond to the performance measurements reflected in the SQMs. This system is called BellSouth's Performance Measurement and Analysis Platform (PMAP). PMAP was fully deployed in March 1999, and it has since been continually enhanced. Additions or modifications to BellSouth's SQMs require corresponding enhancements and changes to PMAP.

The PMAP system is extremely complex, primarily because of the sheer size of the database itself and the amount of data that must be extracted, loaded, and analyzed each month. For example, for the August 1999 production cycle, 65 million records composing 18 Gigabytes of data had to be transported and processed. To put this in perspective, one page of this document would require about 2 Kilobytes of storage. PMAP processes the equivalent of 9 million pages each month. In other words, considering that a typical case of copy paper contains 8 packages of 500 sheets each, totaling 40,000 sheets, PMAP processes approximately the equivalent of 225 cases of paper each month.

In addition to monthly processing, data must be stored for multiple months in the PMAP database. The current PMAP database is approximately 2.5 Terabytes in size. This translates to 1.25 billion pages of text documents or the equivalent of

31,250 cases of paper. Because of this enormous size, the addition of any new reporting requirements must be carefully evaluated.

Complexity also arises from the fact that PMAP data feeds come from many disparate information systems that use different operating platforms, data structures, and identifier codes. Moving the data from one database to another may not be a straightforward task. For example, the date structures for one database may use a "day-month-year" format while another uses a "month-day-year" format. If there are 5 million records that must be moved from one database to the other, every one of the records must have its date structure changed before it is read into the other database. Similarly, if the record's timestamp on one system uses a timestamp that goes down to milliseconds, while another uses hundredths of a second, logic must be created to round up the timestamp before moving it into the new database. In PMAP, multiple checks such as these must be performed on all 65 million records before the data can be transported into the PMAP database.

In addition, many performance reports require correlating bits and pieces of data from different groups and their associated systems within BellSouth. As an example, consider the groups performing the functions of Ordering, Provisioning, and Maintenance & Repair. Data that is important to the Ordering group may be largely irrelevant to the Provisioning and the Maintenance and Repair groups. An example is the time stamp on the receipt of the Local Service Request (LSR) and the completion date on the Service Order. The LSR receipt

time stamp is a key piece of information for the Ordering group since this group is measured on Firm Order Confirmation intervals and this measurement depends on the time the LSR is received. The LSR time stamp is not meaningful to the Provisioning Group and it is not relevant to one of the major systems used by the Provisioning Group, the Service Order Control System (SOCS.) This is because the Provisioning Group and SOCS operate on a Service Order, not an LSR. Conversely, the Service Order completion date (date when service is installed) is not captured by the systems of the Ordering Group. Yet, both the LSR receipt time stamp and the Service Order Completion date are required for the measurement of Total Service Order Cycle Time. Complication arises out of properly identifying and extracting these key bits and pieces of data from each system and associating them so that correct information can be provided. As an additional example, the identification of a certain type of product might require the extraction of characters 89-93 out of a 110-character Provisioning code and cross-referencing it against characters 20-22 of a 40 character Ordering code before the final product identification can be made. Product identification in PMAP and the appropriate levels of disaggregation require many operations similar to these examples.

Currently, PMAP is used to generate performance reports that are available to CLECs across BellSouth's region and to maintain the raw data files used to generate such reports. Reports are produced on a CLEC-specific and CLEC-aggregate basis for each BellSouth state and on a regional basis, with

applicable information concerning BellSouth's retail performance. The raw data maintained in PMAP is CLEC-specific and allows each CLEC to drill down to the individual service order or the individual trouble ticket. Each CLEC can download its raw data file and create an excel spreadsheet to assess its performance data.

PMAP is a leading data collection and reporting system. It was nominated for the 2000 Computerworld Smithsonian Award, which recognizes outstanding accomplishments in the computing field. The following language was cited in the nomination of PMAP for this award: "BellSouth's PMAP data warehouse represents an extraordinary accomplishment in transferring legacy system data elements into meaningful performance measurement information for its wholesale customers and regulators. BellSouth sets the industry standard for performance measurement data management."

BellSouth has made a tremendous commitment to PMAP. Currently, there are in excess of 135 full-time personnel dedicated exclusively to the PMAP system, which includes development, maintenance, testing, etc. BellSouth continues to augment this work group.

**Impacts To PMAP Of Adding New Performance Measures or
Modifying Existing Measures**

Whenever a new performance measurement or product is added to BellSouth's SQMs or when the existing SQMs are modified, corresponding changes must be made to PMAP in order to generate data and reports that are disaggregated appropriately across states, products, etc. Each new or modified

performance measurement also necessitates the development of new viewing formats on BellSouth's website. What may appear to be an uncomplicated request nearly always involves a much larger effort. The impacts to PMAP of adding or modifying the SQMs can be roughly categorized along three dimensions: (i) development impacts; (ii) operational impacts; and (iii) system impacts.

The development impacts address the requirements definition, software development, and unit/system testing that must occur from end-to-end to report the new information. Generating a new performance measurement or modifying an existing measurement would impact the PMAP system from a development standpoint in the following manner (assuming the data is not currently warehoused in the PMAP database); (i) the measurement or enhancement must be designed in sufficient detail to identify the data required for the measure; (ii) once the required data has been determined, the source systems (e.g., LEO, LON, SOCS, etc.) containing the data must be identified; (iii) the source system programmers must modify the programs that extract the data from their database and place it into a file available to PMAP; (iv) the automated extract computer programs that PMAP uses to acquire/reformat/transform the above source system file must be modified; (v) the computer programs that group, transform, and aggregate the data in a meaningful manner must be created and any interdependencies identified and validated; (vi) the audit trail processing that tracks record counts as the data moves through the various stages of PMAP

must be modified; (vii) the computer programs which search the databases and build the reports must be created; and (viii) the new reports must be unit tested for accuracy, and then system tested in a stepwise manner (regression testing) to ensure the changes have not adversely affected the existing reports.

The operational impact is concerned with how the processing cycle is impacted by the addition of computer processing routines. Generating a new performance measurement or modifying an existing measurement would affect the PMAP system from an operational standpoint in the following manner: (i) the impacts to the current time-constrained processing window must be evaluated (i.e., can BellSouth still produce all reports within the current window and still report monthly results in a reasonable period of time); (ii) the production processes, such as job processing order, processing automation programs, and integrity checks must be evaluated and modified; (iii) service level agreements with the source data owners must be arranged so that BellSouth can receive the data in a timely manner; and (iv) the bandwidth of the current data network to allow BellSouth to move all the information across the existing network in a timely manner must be assessed.

The system impacts address requirements for additional disk space, database changes, processor loading, system reporting, security and staffing. Generating a new performance measurement or modifying an existing measurement would impact the PMAP system from a systems standpoint in the following manner: (i) the Development, Test, and Production databases must be

modified to provide new space in the database to place the new data; (ii) data storage requirements must be reviewed to ensure that BellSouth has available disk storage capacity for both the data itself and any mirrored data; (iii) the database and web security tables must be updated to reflect who should have access to the new reports; (iv) system loading assessments must be made to see whether the extra report processing requires the addition of more processors so that processing windows can be met; (v) the tape backup system must be examined to ensure that the data can be safely backed up in a timely manner; and (vi) an assessment must be made of the labor resources required to perform the new development.

Summary

Given all the various components and requirements for valid ongoing delivery of PMAP data and reports described above, BellSouth does not take lightly the development of new measures or the modification of existing measures as ordered in regulatory proceedings. Changes are only made to PMAP in scheduled releases and these releases are limited in size to allow the necessary time, not only for development of the software changes, but also time for significant testing to assure that the new release will not negatively impact the PMAP system. It is unrealistic and unreasonable to assume that any change can be made in PMAP to accommodate new measures or modify existing measurements in 30 days, 60 days or even 90 days. BellSouth must be allowed

sufficient time to evaluate, develop, test and schedule any new measures or measurement modifications that impact the PMAP system.

Comparison of Service Quality Measurements (SQMs)
Florida Staff Proposal vs. BellSouth Proposal

CATEGORY	MEASUREMENT DESCRIPTION IN FLORIDA STAFF FINAL RECOMMENDATION (2/7/2001)	MEASUREMENT DESCRIPTION PROPOSED BY BELLSOUTH (3/1/2001)
(OSS) Operations Support Systems	OSS-1. Average Response Time and Response Interval (Pre-Ordering/Ordering) OSS-2. Interface Availability (Pre-Ordering) OSS-3. Interface Availability (Maintenance & Repair) OSS-4. Response Interval (Maintenance & Repair) OSS-5. Percent Response Received Within "x" Seconds	OSS-1. Average Response Time and Response Interval (Pre-Ordering/Ordering) OSS-2. Interface Availability (Pre-Ordering) OSS-3. Interface Availability (Maintenance & Repair) OSS-4. Response Interval (Maintenance & Repair) PO-1. Loop Make Up – Average Response Time – Manual PO-2. Loop Make Up – Average Response Time – Electronic
(O) Ordering	O-1. Percent Flow-through Service Requests (Summary) O-2. Percent Flow-through Service Requests (Detail) O-3. Flow-through Error Analysis O-4. CLEC LSR Information LSR Flow-Through Matrix O-5. Percent Rejected Service Requests O-6. Reject Interval O-7. Firm Order Confirmation Timeliness O-8. Speed of Answer in Ordering Center O-9. LNP-Percent Rejected Service Request O-10. LNP-Reject Interval Distribution & Average Reject Interval O-11. LNP-Firm Order Confirmation Timeliness Interval Firm Order Confirmation Average Interval O-12. Acknowledgement Timeliness O-13. Acknowledgement Completeness O-14. Loop Make Up Information Average Response	O-1. Acknowledgement Message Timeliness O-2. Acknowledgement Message Completeness O-3. Percent Flow-through Service Requests (Summary) O-4. Percent Flow-through Service Requests (Detail) O-5. Flow-through Error Analysis O-6. CLEC LSR Information LSR Flow-Through Matrix O-7. Percent Rejected Service Requests O-8. Reject Interval O-9. Firm Order Confirmation Timeliness O-10. Service Inquiry with LSR Firm Order Confirmation (FOC) – Response Time Manual O-11. FOC and Reject Response Completeness O-12. Speed of Answer in Ordering Center O-13. LNP-Percent Rejected Service Request O-14. LNP-Reject Interval Distribution & Average Reject Interval

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CATEGORY	MEASUREMENT DESCRIPTION IN FLORIDA STAFF FINAL RECOMMENDATION (2/7/2001)	MEASUREMENT DESCRIPTION PROPOSED BY BELLSOUTH (3/1/2001)
	Time	O-15. LNP-Firm Order Confirmation Timeliness Interval Firm Order Confirmation Average Interval
(P) Provisioning	P-1. Mean Held Order Interval & Distribution Intervals P-2. Average Jeopardy Notice Interval & Percentage of Given Jeopardy Notices P-3. Percent Missed Installation Appointments P-4. Average Completion Interval (OCI) & Order Interval Distribution P-5. Average Completion Notice Interval P-6. Coordinated Customer Conversions Interval P-6A. Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval P-7. % Provisioning Troubles w/i 30 days of Service Order Completion P-8. Total Service Order Cycle Time (TSOCT) P-9. LNP -Percent Missed Installation Appointments P-10. LNP-Average Disconnect Timeliness Interval & Interval Distribution P-11. LNP-Total Service Order Cycle Time	P-1. Mean Held Order Interval & Distribution Intervals P-2. Average Jeopardy Notice Interval & Percentage of Given Jeopardy Notices P-3. Percent Missed Installation Appointments P-4. Average Completion Interval (OCI) & Order Interval Distribution P-5. Average Completion Notice Interval P-6. Coordinated Customer Conversions Interval P-6A. Coordinated Customer Conversions - Hot Cut Timeliness % within Interval and Average Interval P-6B. Coordinated Customer Conversions – Average Recovery Time P-6C. Coordinated Customer Conversions – % Provisioning Troubles Received Within 7 days of a completed Service Order P-7. Cooperative Acceptance Testing - % of xDSL Loops Tested P-8. % Provisioning Troubles within 30 days of Service Order Completion P-9. Total Service Order Cycle Time (TSOCT) P-10. LNP -Percent Missed Installation Appointments P-11. LNP-Average Disconnect Timeliness Interval & Interval Distribution P-12. LNP-Total Service Order Cycle Time
(M&R) Maintenance & Repair	M&R-1. Missed Repair Appointments M&R-2. Customer Trouble Report Rate M&R-3. Maintenance Average Duration M&R-4. Percent Repeat Troubles w/i 30 days M&R-5. Out of Service > 24 Hours M&R-6. Average Answer Time - Repair Centers	M&R-1. Missed Repair Appointments M&R-2. Customer Trouble Report Rate M&R-3. Maintenance Average Duration M&R-4. Percent Repeat Troubles w/i 30 days M&R-5. Out of Service > 24 Hours M&R-6. Average Answer Time - Repair Centers M&R-7. Meantime to Notify CLEC of Network Outages
(B) Billing	B-1. Invoice Accuracy	B-1. Invoice Accuracy

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CATEGORY	MEASUREMENT DESCRIPTION IN FLORIDA STAFF FINAL RECOMMENDATION (2/7/2001)	MEASUREMENT DESCRIPTION PROPOSED BY BELLSOUTH (3/1/2001)
	B-2. Mean Time to Deliver Invoices B-3. Usage Data Delivery Accuracy B-4. Usage Data Delivery Completeness B-5. Usage Data Delivery Timeliness B-6. Mean Time to Deliver Usage	B-2. Mean Time to Deliver Invoices B-3. Usage Data Delivery Accuracy B-4. Usage Data Delivery Completeness B-5. Usage Data Delivery Timeliness B-6. Mean Time to Deliver Usage B-7. Recurring Charge Completeness B-8. Non-Recurring Charge Completeness
(OS) (DA) Operator Services Toll & Directory Assistance	OS-1. Speed to Answer Performance/Average Speed to Answer (Toll) OS-2. Speed to Answer Performance/Percent Answered within "X" Seconds (Toll) DA-1. Speed to Answer Performance/Average Speed to Answer (DA) DA-2. Speed to Answer Performance/Percent Answered within "X" Seconds (DA)	OS-1. Speed to Answer Performance/Average Speed to Answer (Toll) OS-2. Speed to Answer Performance/Percent Answered within "X" Seconds (Toll) DA-1. Speed to Answer Performance/Average Speed to Answer (DA) DA-2. Speed to Answer Performance/Percent Answered within "X" Seconds (DA)
(D) Database Update Information		D-1. Database Update – Interval and Average Interval D-2. Database Update - % Accuracy D-3. NXX and LRNs Loaded by LERG Effective Date
(E) E911	E-1. Timeliness E-2. Accuracy E-3. Mean Interval	E-1. Timeliness E-2. Accuracy E-3. Mean Interval
(TGP) Trunk Group Performance	TGP-1. Trunk Group Performance-Aggregate TGP-2. Trunk Group Performance-CLEC Specific TGP-3. Trunk Group Service Report TGP-4. Trunk Group Service Detail	TGP-1. Trunk Group Performance-Aggregate TGP-2. Trunk Group Performance-CLEC Specific
(C) Collocation	C-1. Average Response Time C-2. Average Arrangement Time C-3. Percent of Due Dates Missed	C-1. Average Response Time C-2. Average Arrangement Time C-3. Percent of Due Dates Missed
(CM) Change Management	CM-1 Timeliness of Change Management Notices CM-2 Average Delay Days for Change Management Notices CM-3 Timeliness of Documents Associated with Change CM-4 Average Delay Days for Documentation	CM-1 Timeliness of Change Management Notices CM-2 Change Management Notices Average Delay Days CM-3 Timeliness of Documents Associated with Change CM-4 Change Management Documentation Average Delay Days CM-5 Notification of Interface Outages

Disaggregation & Analog/Benchmark Comparison
Florida Staff Recommendation vs. BellSouth Proposal

FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
OSS-1 Average Response Time and Response Interval		OSS-1 Average Response Time and Response Interval	
Region	Parity with Retail	Region	Parity + 4 Seconds
OSS-2. Interface Availability (Pre-Ordering)		OSS-2. Interface Availability (Pre-Ordering)	
Region	≥ 99.5%	Region	≥ 99.5%
OSS-3. Interface Availability (Maintenance & Repair)		OSS-3. Interface Availability (Maintenance & Repair)	
Region	All systems except ECTA – Parity with Retail ECTA – ≥ 99.5%	Region	≥ 99.5%
OSS-4. Response Interval (Maintenance & Repair)		OSS-4. Response Interval (Maintenance & Repair)	
Region	TAFI (Front End) – Parity with Retail All Others – Parity by Design	Region	Parity
OSS-5 Percent Response Received Within "x" Seconds			
O-1. Percent Flow-through Service Requests (Summary)		O-3. Percent Flow-through Service Requests (Summary)	
Residence	95%	Residence	95%
Business	80%	Business	90%
UNE	80%	UNE	85%
LNP		LNP	85%
O-2. Percent Flow-through Service Requests (Detail)		O-4. Percent Flow-through Service Requests (Detail)	
Residence	95%	Residence	95%
Business	80%	Business	90%
UNE	80%	UNE	85%
LNP		LNP	85%
O-3. Flow-through Error Analysis		O-5. Flow-through Error Analysis	
N/A	N/A	N/A	N/A
O-4. CLEC LSR Information LSR Flow-Through Matrix		O-6. CLEC LSR Information LSR Flow-Through Matrix	
Region	Diagnostic	N/A	N/A

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
O-5. Percent Rejected Service Requests		O-7. Percent Rejected Service Requests	
Resale Residence Resale Business Resale Design (Special) Other UNE UNE Loop with NP Interconnection Trunks	Diagnostic	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks	Diagnostic
O-6. Reject Interval		O-8. Reject Interval	
Resale Residence Resale Business Resale Design (Special) UNE Design UNE Non-Design UNE Loop with and w/o NP Interconnection Trunks	Mechanized 97% ≤ 1 Hour Non-mechanized and Partially Mechanized 85% < 24 Hours Local Interconnection Trunks 85% within 4 days	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing	Mechanized: 97% within 1 Hour Partially Mechanized: 85% within 18 Hours in 3 Months 85% within 10 Hours in 6 Months Non-Mechanized: 85% within 24 Hours

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Local Interoffice Transport Local Interconnection Trunks	85% within 4 Days
O-7. Firm Order Confirmation Timeliness		O-9. Firm Order Confirmation Timeliness	
Resale Residence Resale Business Resale Design (Special) UNE Design UNE Non-Design UNE Loop with and w/o NP Interconnection Trunks	Mechanized 95% ≤ 3 Hour Non-mechanized and Partially Mechanized 85% < 36 Hours Local Interconnection Trunks 95% within 10 days	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks	Mechanized. 95% within 3 Hours Partially Mechanized: 85% within 18 Hours in 3 Months 85% within 10 Hours in 6 Months Non-Mechanized: 85% within 36 Hours 85% within 4 Days
O-8. Speed of Answer in Ordering Center		O-12. Speed of Answer in Ordering Center	
CLEC – Local Carrier Service Center BellSouth - Business Service Center - Residence Service Center	Parity with Retail	CLEC – Local Carrier Service Center BellSouth - Business Service Center - Residence Service Center	Diagnostic
O-9. LNP-Percent Rejected Service Request		O-13. LNP-Percent Rejected Service Request	
LNP LNP Loop with LNP	Diagnostic	LNP UNE Loop with LNP	Diagnostic
O-10. LNP-Reject Interval Distribution & Average Reject Interval		O-14. LNP-Reject Interval Distribution & Average Reject Interval	
LNP LNP Loop with LNP	Mechanized – 97% ≤ 1 Hour Partially Mechanized and Non- Mechanized – 85% < 24 Hours	LNP UNE Loop with LNP	Mechanized: 97% within 1 Hour Partially Mechanized: 85% ≤ 18 Hours Non-Mechanized: 85% < 24 Hours
O-11. LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval		O-15. LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval	

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
LNP LNP Loop with LNP	Mechanized – 95% ≤ 3 Hours Partially Mechanized and Non-Mechanized – 85% < 36 Hours	LNP UNE Loop with LNP	Mechanized 95% within 3 Hours Partially Mechanized: 85% ≤ 18 Hours (10 hours after 6 months) Non-Mechanized: 85% < 36 Hours
O-12. Acknowledgement Timeliness		O-1 Acknowledgement Message Timeliness	
		EDI	90% within 30 Minutes (6 months – 95% within 30 Minutes)
		TAG	95% within 30 Minutes
O-13 Acknowledgement Completeness		O-2 Acknowledgement Message Completeness	
		EDI	100%
		TAG	
O-14 Loop Make Up Information Average Response Time		PO-1 Loop Make Up – Average Response Time – Manual	
		Loops	95% in 3 Business Days
		PO-2 Loop Make Up – Average Response Time – Electronic	
		Loops	90% in 5 Minutes (Reassess after 6 months – new system)
		O-10 Service Inquiry with LSR Firm Order Confirmation (FOC) – Response Time Manual	
		xDSL (includes UNE unbundled ADSL, HDSL and UNE Unbundled Copper Loops) Unbundled Interoffice Transport	95% Returned within 5 Business Days
		O-11 FOC and Reject Response Completeness	
		Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1	95% Returned

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks	
P-1. Mean Held Order Interval & Distribution Intervals		P-1. Mean Held Order Interval & Distribution Intervals	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop with NP-Non-Design UNE 2w Loop w/o NP-Non-Design UNE Loop Other with NP-Non-Design UNE Loop Other w/o NP-Non-Design UNE Other Non-Design UNE 2w Loop with NP-Design UNE 2w Loop w/o NP-Design UNE Loop Other with NP-Design UNE Loop Other w/o NP-Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
P-2. Average Jeopardy Notice		P-2. Average Jeopardy Notice	
Resale Residence Resale Business Resale Design	95% ≥ 48 Hours 95% ≥ 48 Hours 95% ≥ 48 Hours	Resale Residence Resale Business Resale Design	95% ≥ 48 Hours 95% ≥ 48 Hours 95% ≥ 48 Hours

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
Resale PBX	95% ≥ 48 Hours	Resale PBX	95% ≥ 48 Hours
Retail Centrex	95% ≥ 48 Hours	Resale Centrex	95% ≥ 48 Hours
Resale ISDN	95% ≥ 48 Hours	Resale ISDN	95% ≥ 48 Hours
UNE Loop and Port Combos	95% ≥ 48 Hours	LNP (Standalone)	95% ≥ 48 Hours
UNE 2w Loop with NP-Non-Design	95% ≥ 48 Hours	2w Analog Loop Design	95% ≥ 48 Hours
UNE 2w Loop w/o NP-Non-Design	95% ≥ 48 Hours	2w Analog Loop Non-Design	95% ≥ 48 Hours
UNE Loop Other with NP-Non-Design	95% ≥ 48 Hours	UNE Digital Loop < DS1	95% ≥ 48 Hours
UNE Loop Other w/o NP-Non-Design	95% ≥ 48 Hours	UNE Digital Loop ≥ DS1	95% ≥ 48 Hours
UNE Other Non-Design	95% ≥ 48 Hours	UNE Loop + Port Combinations	95% ≥ 48 Hours
UNE 2w Loop with NP-Design	95% ≥ 48 Hours	UNE Switch Ports	95% ≥ 48 Hours
UNE 2w Loop w/o NP-Design	95% ≥ 48 Hours	UNE Combo Other	95% ≥ 48 Hours
UNE Loop Other with NP-Design	95% ≥ 48 Hours	UNE xDSL (ADSL, HDSL, UCL)	95% ≥ 48 Hours
UNE Loop Other w/o NP-Design	95% ≥ 48 Hours	UNE ISDN (includes UDC)	95% ≥ 48 Hours
UNE Other Design	95% ≥ 48 Hours	UNE Line Sharing	95% ≥ 48 Hours
Local Interconnection Trunks	95% ≥ 48 Hours	Local Transport (Unbundled Interoffice Transport)	95% ≥ 48 Hours
Switching	Retail with POTS	Local Interconnection Trunks	95% ≥ 48 Hours
Local Transport	Retail DS1 or DS3 as appropriate		
P.2. Percentage of Orders Given Jeopardy Notices		P.2. Percentage of Orders Given Jeopardy Notices	

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop with NP-Non-Design UNE 2w Loop w/o NP-Non-Design UNE Loop Other with NP-Non-Design UNE Loop Other w/o NP-Non-Design UNE Other Non-Design UNE 2w Loop with NP-Design UNE 2w Loop w/o NP-Design UNE Loop Other with NP-Design UNE Loop Other w/o NP-Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
P-3. Percent Missed Installation Appointments		P-3. Percent Missed Installation Appointments	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop with NP-Non-Design UNE 2w Loop w/o NP-Non-Design UNE Loop Other with NP-Non-Design UNE Loop Other w/o NP-Non-Design UNE Other Non-Design	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business	Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
UNE 2w Loop with NP-Design UNE 2w Loop w/o NP-Design UNE Loop Other with NP-Design UNE Loop Other w/o NP-Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Retail Residence and Business Retail Residence and Business Retail Design Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp ADSL provided to Retail Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
P-4. Average Completion Interval (OCI) & Order Completion Interval Distribution		P-4. Average Completion Interval (OCI) & Order Completion Interval Distribution	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop with NP-Non-Design UNE 2w Loop w/o NP-Non-Design UNE Loop Other with NP-Non-Design UNE Loop Other w/o NP-Non-Design UNE Other Non-Design UNE 2w Loop with NP-Design UNE 2w Loop w/o NP-Design UNE Loop Other with NP-Design UNE Loop Other w/o NP-Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp 7 Days w/o conditioning 14 Days with conditioning Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
P-5. Average Completion Notice Interval		P-5. Average Completion Notice Interval	

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop with NP-Non-Design UNE 2w Loop w/o NP-Non-Design UNE Loop Other with NP-Non-Design UNE Loop Other w/o NP-Non-Design UNE Other Non-Design UNE 2w Loop with NP-Design UNE 2w Loop w/o NP-Design UNE Loop Other with NP-Design UNE Loop Other w/o NP-Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
P-6. Coordinated Customer Conversions Interval		P-6. Coordinated Customer Conversions Interval	
Unbundled Loops w INP (UNE LOOP)	95% ≤ 15 Minutes	Unbundled Loops w INP	95% ≤ 15 Minutes
Unbundled Loops w LNP (UNE LOOP)	95% ≤ 15 Minutes	Unbundled Loops w LNP	95% ≤ 15 Minutes
P-6A. Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval		P-6A. Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval	
SL1 Time Specific SL1 Non Time Specific SL2 Time Specific SL2 Non Time Specific	95% + or – 15 minutes of Scheduled Start Time	SL1 Time Specific SL1 Non Time Specific SL2 Time Specific SL2 Non Time Specific SL1 IDLC SL2 IDLC	95% + or – 15 minutes of Scheduled Start Time 95% within 4 Hour window 95% within 4 Hour window
		P-6B. Coordinated Customer Conversions – Average Recovery Time	
		Unbundled Loops with INP	Diagnostic

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Unbundled Loops with LNP	Diagnostic
		P-6C. Coordinated Customer Conversions – % Provisioning Troubles Received Within 7 days of a completed Service Order	
		UNE Loop Design UNE Loop Non-Design Dispatch/Non-Dispatch	≤ 5%
P-7. % Provisioning Troubles w/i 30 days of Service Order Completion		P-8. % Provisioning Troubles within 30 days of Service Order Completion	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop with NP-Non-Design UNE 2w Loop w/o NP-Non-Design UNE Loop Other with NP-Non-Design UNE Loop Other w/o NP-Non-Design UNE Other Non-Design UNE 2w Loop with NP-Design UNE 2w Loop w/o NP-Design UNE Loop Other with NP-Design UNE Loop Other w/o NP-Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
P-8. Total Service Order Cycle Time (TSOCT)		P-9. Total Service Order Cycle Time (TSOCT)	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex	Diagnostic Diagnostic Diagnostic Diagnostic Diagnostic	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex	Diagnostic Diagnostic Diagnostic Diagnostic Diagnostic

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Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
Resale ISDN	Diagnostic	Resale ISDN	Diagnostic
UNE Loop and Port Combos	Diagnostic	LNP (Standalone)	Diagnostic
UNE 2w Loop with NP-Non-Design	Diagnostic	2w Analog Loop Design	Diagnostic
UNE 2w Loop w/o NP-Non-Design	Diagnostic	2w Analog Loop Non-Design	Diagnostic
UNE Loop Other with NP-Non-Design	Diagnostic		
UNE Loop Other w/o NP-Non-Design	Diagnostic	UNE Digital Loop < DS1	Diagnostic
UNE Other Non-Design	Diagnostic	UNE Digital Loop ≥ DS1	Diagnostic
UNE 2w Loop with NP-Design	Diagnostic	UNE Loop + Port Combinations	Diagnostic
UNE 2w Loop w/o NP-Design	Diagnostic	UNE Switch Ports	Diagnostic
UNE Loop Other with NP-Design	Diagnostic	UNE Combo Other	Diagnostic
UNE Loop Other w/o NP-Design	Diagnostic	UNE xDSL (ADSL, HDSL, UCL)	Diagnostic
UNE Other Design	Diagnostic	UNE ISDN (includes UDC)	Diagnostic
Local Interconnection Trunks	Diagnostic	UNE Line Sharing	Diagnostic
Switching	Diagnostic	Local Transport (Unbundled Interoffice Transport)	Diagnostic
Local Transport	Diagnostic	Local Interconnection Trunks	Diagnostic
P-9. LNP -Percent Missed Installation Appointments		P-10. LNP -Percent Missed Installation Appointments	
LNP	Retail Residence and Business	LNP	Retail Residence and Business (POTS)
UNE Loop Associated with LNP	Retail Residence and Business		
P-10. LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution		P-11. LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	
LNP	95% < 15 Minutes	LNP	95% < 15 Minutes
UNE Loop Associated with LNP	95% < 15 Minutes		
P-11. LNP-Total Service Order Cycle Time		P-12. LNP-Total Service Order Cycle Time	
LNP	Diagnostic	LNP	Diagnostic
UNE Loop Associated with LNP	Diagnostic		
		P-7. Cooperative Acceptance Testing - % of xDSL Loops Tested	
		UNE xDSL	95% of Lines Tested
		- ADSL	
		- HDSL	
		- UCL	
		- OTHER	

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
M&R-1. Missed Repair Appointments		M&R-1. Missed Repair Appointments	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop Non-Design UNE Loop Other Non-Design UNE Other Non-Design UNE 2w Loop Design UNE Loop Other Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
M&R-2. Customer Trouble Report Rate		M&R-2. Customer Trouble Report Rate	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop Non-Design UNE Loop Other Non-Design UNE Other Non-Design UNE 2w Loop Design UNE Loop Other Design	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus

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Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
UNE Other Design Local Interconnection Trunks Switching Local Transport	Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Res and Bus (POTS) Retail Res and Bus and Design Disp ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
M&R-3. Maintenance Average Duration		M&R-3. Maintenance Average Duration	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop Non-Design UNE Loop Other Non-Design UNE Other Non-Design UNE 2w Loop Design UNE Loop Other Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
M&R-4. Percent Repeat Troubles w/i 30 days		M&R-4. Percent Repeat Troubles w/i 30 days	
Resale Residence Resale Business Resale Design Resale PBX	Parity with Retail Parity with Retail Parity with Retail Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX	Retail Residence Retail Business Retail Design Retail PBX

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop Non-Design UNE Loop Other Non-Design UNE Other Non-Design UNE 2w Loop Design UNE Loop Other Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail
M&R-5. Out of Service > 24 Hours		M&R-5. Out of Service > 24 Hours	
Resale Residence Resale Business Resale Design Resale PBX Retail Centrex Resale ISDN UNE Loop and Port Combos UNE 2w Loop Non-Design UNE Loop Other Non-Design UNE Other Non-Design UNE 2w Loop Design UNE Loop Other Design UNE Other Design Local Interconnection Trunks Switching Local Transport	Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Parity with Retail Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Residence and Business Retail Design Retail Design Parity with Retail Retail with POTS Retail DS1 or DS3 as appropriate	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res and Bus (POTS) Retail Res and Bus and Design Disp ADSL provided to Retail Retail ISDN – BRI ADSL provided to Retail

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail DS1 and DS3 Interoffice Parity with Retail
M&R-6. Average Answer Time - Repair Centers		M&R-6 Average Answer Time - Repair Centers	
Region	Parity with Retail	Region	Parity with Retail
		M&R-7. Meantime to Notify CLEC of Network Outages	
		BellSouth Aggregate CLEC Aggregate CLEC Specific	Parity by Design
B-1. Invoice Accuracy		B-1. Invoice Accuracy	
Resale UNE Interconnection	Parity with BST Retail Aggregate	Resale UNE Interconnection	Parity with BST Retail Aggregate
B-2. Mean Time to Deliver Invoices		B-2. Mean Time to Deliver Invoices	
Resale UNE Interconnection	Parity with BST Retail Aggregate	Resale UNE Interconnection	CRIS-based invoices will be released for delivery w/i six (6) business days CABS-based invoices will be released for delivery w/l eight (8) calendar days CLEC Average Delivery Intervals for both CRIS and CABS invoices are comparable to BellSouth Average delivery for both systems.
B-3. Usage Data Delivery Accuracy		B-3. Usage Data Delivery Accuracy	
Region	Parity with Retail	Region	Parity with Retail
B-4. Usage Data Delivery Completeness		B-4. Usage Data Delivery Completeness	
Region	Parity with Retail	Region	Parity with Retail
B-5. Usage Data Delivery Timeliness		B-5 Usage Data Delivery Timeliness	
Region	Parity with Retail	Region	Parity with Retail
B-6. Mean Time to Deliver Usage		B-6. Mean Time to Deliver Usage	
Region	Parity with Retail	Region	Parity with Retail
		B-7. Recurring Charge Completeness	
		Resale	Parity

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		UNE Interconnection	90% 90%
		B-8. Non-Recurring Charge Completeness	
		Resale UNE Interconnection	Parity 90% 90%
OS-1. Speed to Answer Performance/Average Speed to Answer (Toll)		OS-1. Speed to Answer Performance/Average Speed to Answer (Toll)	
None	Parity by Design	None	Parity by Design
OS-2. Speed to Answer Performance/Percent Answered within "X" Seconds (Toll)		OS-2. Speed to Answer Performance/Percent Answered within "X" Seconds (Toll)	
None	Parity by Design	None	Parity by Design
DA-1. Speed to Answer Performance/Average Speed to Answer (DA)		DA-1. Speed to Answer Performance/Average Speed to Answer (DA)	
None	Parity by Design	None	Parity by Design
DA-2. Speed to Answer Performance/Percent Answered within "X" Seconds (DA)		DA-2. Speed to Answer Performance/Percent Answered within "X" Seconds (DA)	
None	Parity by Design	None	Parity by Design
		D-1. Database Update – Interval and Average Interval	
		LIDB Directory Listing Directory Assistance	Parity by Design
		D-2. Database Update - % Accuracy	
		LIDB Directory Listing	95% Accurate 95% Accurate
		D-3. NXX and LRNs Loaded by LERG Effective Date	
		Region	100% by LERG effective date
	(E) E911		(E) E911
E-1. Timeliness		E-1. Timeliness	
None	Parity by Design	None	Parity by Design
E-2. Accuracy		E-2. Accuracy	
None	Parity by Design	None	Parity by Design
E-3. Mean Interval		E-3. Mean Interval	

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
None	Parity by Design	None	Parity by Design
TGP-1. Trunk Group Performance-Aggregate		TGP-1. Trunk Group Performance-Aggregate	
Trunk Group	Parity with Retail	CLEC aggregate BellSouth aggregate	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth
TGP-2. Trunk Group Performance-CLEC Specific		TGP-2. Trunk Group Performance-CLEC Specific	
Trunk Group	Parity with Retail	CLEC trunk group	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth
TGP-3. Trunk Group Service Report			
State	Parity with Retail		
TGP-4. Trunk Group Service Detail			
State	Parity with Retail		
C-1. Average Response Time		C-1. Average Response Time	
Virtual – Initial	15 Calendar Days	Virtual – Initial	Virtual – 15 Calendar Days Physical Caged – 15 Calendar Days Physical Cageless – 15 Calendar Days
Virtual – Augment	15 Calendar Days	Virtual – Augment	
Virtual – Combined	15 Calendar Days	Physical Caged – Initial	
Physical – Initial	15 Calendar Days	Physical Caged – Augment	
Physical – Augment	15 Calendar Days	Physical Cageless - Initial	
Physical – Combined	15 Calendar Days	Physical Cageless - Augment	
Caged/Cageless (under development)			
C-2. Average Arrangement Time		C-2. Average Arrangement Time	
Virtual – Initial	Virtual 60 Calendar Days	Virtual – Initial	Virtual – 60 Calendar Days Virtual - Augment– 45 Calendar Days (w/o Space Increase) Virtual - Augment– 60 Calendar Days (with Space Increase)
Virtual – Augment	Virtual Augment (with space increase) 60 Calendar Days	Virtual – Augment	
Virtual – Combined	Virtual Augment (without space increase) 45 Calendar Days	Physical Caged – Initial	
Physical – Initial		Physical Caged – Augment	
Physical – Augment		Physical Cageless - Initial	

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
Physical – Combined Caged/Cageless (under development)	Physical 90 Calendar Days Physical Augment (with space increase) 90 Calendar Days Physical Augment (without space increase) 45 Calendar Days	Physical Cageless - Augment	Physical Caged – 90 Calendar Days (Ordinary) Physical Caged – Augment – 45 Calendar Days (w/o Space Increase) Physical Caged – Augment – 90 Calendar Days (with Space Increase) Physical Cageless – 90 Calendar Days Physical Cageless - Augment – 45 Calendar Days (w/o Space Increase) Physical Cageless - Augment – 90 Calendar Days (with Space Increase)
C-3. Percent of Due Dates Missed		C-3. Percent of Due Dates Missed	
Virtual – Initial Virtual – Augment Virtual – Combined Physical – Initial Physical – Augment Physical – Combined Caged/Cageless (under development)	90% ≤ Commit Date (Virtual & Physical)	Virtual – Initial Virtual – Augment Virtual – Combined Physical Caged – Initial Physical Caged – Augment Physical Cageless - Initial Physical Cageless - Augment	≥ 90% on Time
CM-1 Timeliness of Change Management Notices		CM-1 Timeliness of Change Management Notices	
Region	98% on Time	Region	95% ≥ 30 days of Release
CM-2 Average Delay Days for Change Management Notices		CM-2 Average Delay Days for Change Management Notices	
Region	90% ≤ 5 Days	Region	90% ≤ 8 Days
CM-3 Timeliness of Documents Associated with Change		CM-3 Timeliness of Documents Associated with Change	
Region	98% on Time	Region	95% ≥ 30 days if new features coding is required 95% ≥ 5 days for documentation defects, corrections or clarifications
CM-4 Average Delay Days for Documentation		CM-4 Average Delay Days for Documentation	
Region	90% ≤ 5 Days	Region	90% ≤ 8 Days
		CM-5 Notification of Interface Outages	
		By interface type for all interfaces	97% in 15 Minutes

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation accesses by CLECs	Analog/Benchmark

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Comparison of Enforcement Measurements
Florida Staff Recommendation vs. BellSouth Proposal

FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
OSS-1 Average Response Time and Response Interval		OSS-1 Average Response Time and Response Interval	
Region	Parity with Retail	Region	Percent Response Received within 6.3 seconds: > 95%
OSS-2. Interface Availability		OSS-2. Interface Availability (Pre-Ordering)	
Region	≥ 99.5%	Region	≥ 99.5%
		OSS-3 Interface Availability (Maintenance & Repair)	
		Region	≥ 99.5%
O-1. Percent Flow-through Service Requests (Summary)		O-3. Percent Flow-through Service Requests (Summary)	
Residence	≥ 95%	Residence	95%
Business	≥ 80%	Business	90%
UNE	≥ 80%	UNE	85%
LNP	≥ 95%	LNP	85%
O-2. Percent Flow-through Service Requests (Detail)			
Residence	≥ 95%		
Business	≥ 80%		
UNE	≥ 80%		
LNP	≥ 95%		
O-6. Reject Interval		O-8. Reject Interval	
Mechanized	97% ≤ 1 Hour	Fully Mechanized	97% within 1 Hour
Partially Mechanized	85% < 24 Hours		
Non-mechanized	85% < 24 Hours		
Local Interconnection Trunks	85% within 4 days		
O-7. Firm Order Confirmation Timeliness		O-9. Firm Order Confirmation Timeliness	
Mechanized	95% ≤ 3 Hour	Mechanized	95% ≤ 3 Hour
Partially Mechanized	85% < 36 Hours	Partially Mechanized	85% w/ 18 Hours (in 3 months)
Non-mechanized	85% < 36 Hours		85% w/ 10 Hours (in 6 months)
Local Interconnection Trunks	95% within 10 days	Non-mechanized	85% < 36 Hours
		Local Interconnection Trunks	95% within 10 days

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		O-1 Acknowledgement Message Timeliness	
		EDI	90% within 30 Minutes (6 months – 95% within 30 Minutes)
		TAG	95% within 30 Minutes
		O-2 Acknowledgement Message Completeness	
		EDI	100%
		TAG	
O-14 Loop Make Up Information Average Response Time		PO-1 Loop Make Up – Average Response Time – Manual	
Manual	95% < 3 Business Days	Loops	95% in 3 Business Days
Electronic	95% ≤ 1 Minute		
		PO-2 Loop Make Up – Average Response Time – Electronic	
		Loops	90% in 5 Minutes
		O-11 FOC and Reject Response Completeness	
		Fully Mechanized	95% Returned
P-3. Percent Missed Installation Appointments		P-3. Percent Missed Installation Appointments	
Resale POTS	Parity with Retail POTS	Resale POTS	Retail Residence and Business (POTS)
Resale Design	Parity with Retail Design	Resale Design	Retail Design
UNE Loop and Port Combos	Retail Residence and Business	UNE Loop and Port Combos	Retail Residence and Business
UNE Loops Design	Retail Residence and Business	UNE Loops	Retail Residence and Business Dispatch
UNE Loops Non-Design	Retail Residence and Business	UNE xDSL	ADSL Provided to Retail
UNE xDSL	ADSL Provided to Retail	UNE Line Sharing	ADSL Provided to Retail
UNE Line Sharing	ADSL Provided to Retail	Local Interconnection Trunks	Parity with Retail
IC Trunks	Parity with Retail		
P-4. Average Completion Interval (OCI) & Order Completion Interval Distribution		P-4. Average Completion Interval (OCI) & Order Completion Interval Distribution	
Resale POTS	Parity with Retail POTS	Resale POTS	Retail Residence and Business (POTS)
Resale Design	Parity with Retail Design	Resale Design	Retail Design
UNE Loop and Port Combos	Retail Residence and Business	UNE Loop and Port Combos	Retail Residence and Business
UNE Loops Design	Retail Residence and Business	UNE Loops	Retail Residence and Business Dispatch
UNE Loops Non-Design	Retail Residence and Business	UNE xDSL	7 Days w/o Conditioning
UNE xDSL	7 Days w/o Conditioning	UNE xDSL	14 Days w Conditioning
	14 Days w Conditioning	UNE Line Sharing	ADSL Provided to Retail

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
UNE Line Sharing IC Trunks	ADSL Provided to Retail Parity with Retail	Local Interconnection Trunks	Parity with Retail
P-6. Coordinated Customer Conversions Interval		P-6. Coordinated Customer Conversions Interval	
Unbundled Loops	95% ≤ 15 Minutes	Unbundled Loops	95% ≤ 15 Minutes
P-6A. Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval		P-6A. Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval	
	95% + or – 15 minutes of Scheduled Start Time	UNE Loops	95% + or – 15 minutes of Scheduled Start Time
		SL1 IDLC SL2 IDLC	95% within 4 Hour window 95% within 4 Hour window
		P-6C. Coordinated Customer Conversions – % Provisioning Troubles Received Within 7 days of a completed Service Order	
		UNE Loops	≤ 5%
P-7. % Provisioning Troubles w/i 30 days of Service Order Completion		P-8. % Provisioning Troubles within 30 days of Service Order Completion	
Resale POTS Resale Design UNE Loop and Port Combos UNE Loops Design UNE Loops Non-Design UNE xDSL UNE Line Sharing IC Trunks	Parity with Retail POTS Parity with Retail Design Retail Residence and Business Retail Residence and Business Retail Residence and Business ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale POTS Resale Design UNE Loop and Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail
P-9. LNP –Percent Missed Installation Appointments		P-10. LNP –Percent Missed Installation Appointments	
	Retail Residence and Business	LNP	Retail Residence and Business (POTS)
P-10. LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution		P-11. LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	
	95% < 15 Minutes	LNP	95% within 15 Minutes
		P-7. Cooperative Acceptance Testing - % of xDSL Loops Tested	
		UNE xDSL	95% of Lines Tested

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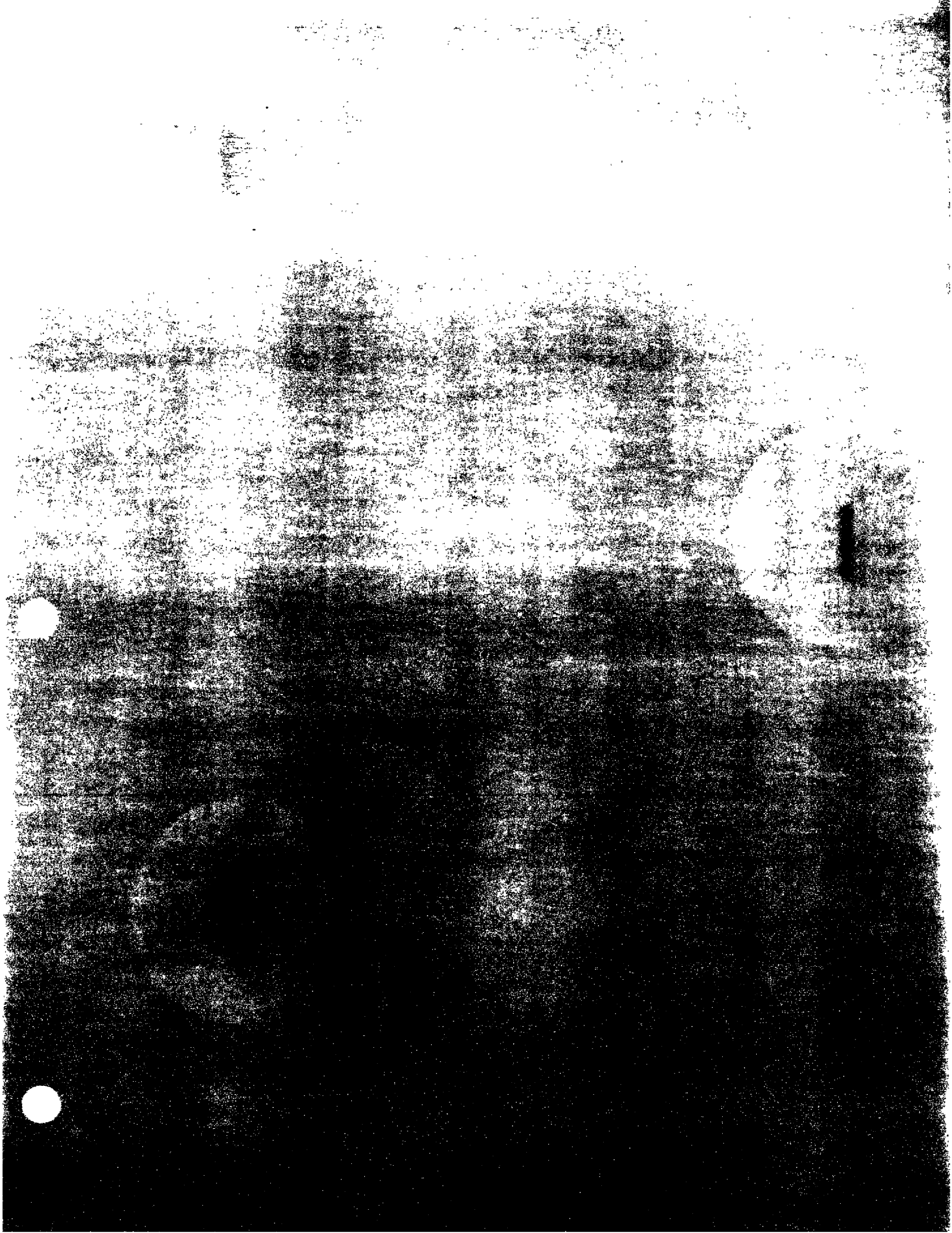
FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
M&R-1. Missed Repair Appointments		M&R-1. Missed Repair Appointments	
Resale POTS Resale Design UNE Loop and Port Combos UNE Loops Design UNE Loops Non-Design UNE xDSL UNE Line Sharing IC Trunks	Parity with Retail POTS Parity with Retail Design Retail Residence and Business Retail Residence and Business Retail Residence and Business ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale POTS Resale Design UNE Loop and Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail
M&R-2. Customer Trouble Report Rate		M&R-2. Customer Trouble Report Rate	
Resale POTS Resale Design UNE Loop and Port Combos UNE Loops Design UNE Loops Non-Design UNE xDSL UNE Line Sharing IC Trunks	Parity with Retail POTS Parity with Retail Design Retail Residence and Business Retail Residence and Business Retail Residence and Business ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale POTS Resale Design UNE Loop and Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail
M&R-3. Maintenance Average Duration		M&R-3. Maintenance Average Duration	
Resale POTS Resale Design UNE Loop and Port Combos UNE Loops Design UNE Loops Non-Design UNE xDSL UNE Line Sharing IC Trunks	Parity with Retail POTS Parity with Retail Design Retail Residence and Business Retail Residence and Business Retail Residence and Business ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	Resale POTS Resale Design UNE Loop and Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business (POTS) Retail Design Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail
M&R-4. Percent Repeat Troubles w/i 30 days		M&R-4. Percent Repeat Troubles w/i 30 days	
Resale POTS Resale Design	Parity with Retail POTS Parity with Retail Design	Resale POTS Resale Design	Retail Residence and Business (POTS) Retail Design

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
UNE Loop and Port Combos UNE Loops Design UNE Loops Non-Design UNE xDSL UNE Line Sharing IC Trunks	Retail Residence and Business Retail Residence and Business Retail Residence and Business ADSL Provided to Retail ADSL Provided to Retail Parity with Retail	UNE Loop and Port Combos UNE Loops UNE xDSL UNE Line Sharing Local Interconnection Trunks	Retail Residence and Business Retail Residence and Business Dispatch ADSL Provided to Retail ADSL Provided to Retail Parity with Retail
B-1. Invoice Accuracy		B-1. Invoice Accuracy	
Region	Parity with Retail	CLEC State BellSouth State	Parity with Retail
B-2. Mean Time to Deliver Invoices		B-2. Mean Time to Deliver Invoices	
Region	Parity with Retail	CLEC State - CRIS - CABS BellSouth State	Parity with Retail
B-3. Usage Data Delivery Accuracy		B-3. Usage Data Delivery Accuracy	
Region	Parity with Retail	CLEC State BellSouth State	Parity with Retail
TGP-1. Trunk Group Performance-Aggregate		TGP-1. Trunk Group Performance-Aggregate	
Trunk Group	Parity with Retail	CLEC aggregate BellSouth aggregate	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth
TGP-2. Trunk Group Performance-CLEC Specific		TGP-2. Trunk Group Performance-CLEC Specific	
Trunk Group	Parity with Retail	CLEC Trunk Group BellSouth Trunk Group	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth

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FLORIDA STAFF RECOMMENDATION 2/7/2001		BELLSOUTH PROPOSAL 3/1/2001	
Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
C-3. Percent of Due Dates Missed	≤ 10%	C-3. Percent of Due Dates Missed	≥ 90% on Time
		All Collocation Arrangements	≥ 90% on Time
(CM) Change Management		(CM) Change Management	
CM-1 Timeliness of Change Management Notices		CM-1 Timeliness of Change Management Notices	
Region	98% on Time	Region	95% ≥ 30 days of Release
		CM-3 Timeliness of Documents Associated with Change	
		Region	95% ≥ 30 days of the change



SECTION A

Fee Schedule per affected item

LIQUIDATED DAMAGES TABLE FOR TIER-1 MEASURES

PER AFFECTED ITEM						
	Month 1	Month 2	Month3	Month4	Month 5	Month 6
Pre-Ordering	\$20	\$30	\$40	\$50	\$60	\$70
Ordering	\$40	\$50	\$60	\$70	\$80	\$90
Provisioning	\$100	\$125	\$175	\$250	\$325	\$500
Provisioning UNE (Coordinated Customer Conversions)	\$400	\$450	\$500	\$550	\$650	\$800
Maintenance and Repair	\$100	\$125	\$175	\$250	\$325	\$500
Maintenance and Repair UNE	\$400	\$450	\$500	\$550	\$650	\$800
LNP	\$150	\$250	\$500	\$600	\$700	\$800
Billing	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00	\$1.00
Change Management	\$1000	\$1000	\$1000	\$1000	\$1000	\$1000
IC Trunks	\$100	\$125	\$175	\$250	\$325	\$500
Collocation	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000

REMEDY PAYMENTS FOR TIER-2 MEASURES

	Per Affected Item
OSS Pre-Ordering	\$20
Ordering	\$60
Provisioning	\$300
UNE Provisioning (Coordinated Customer Conversions)	\$875
Maintenance and Repair	\$300
UNE Maintenance and Repair	\$875
Billing	\$1.00
LNP	\$500
IC Trunks	\$500
Collocation	\$15,000
Change Management	\$1,000

SECTION B

Calculation Procedures

SEEM REMEDY PROCEDURE

TIER-1 CALCULATION FOR RETAIL ANALOGUES:

1. Calculate the overall test statistic for each ALEC; Z_{ALEC-1}^T (Per Statistical Methodology discussed by Dr. Mulrow)
2. Calculate the balancing critical value (B_{ALEC-1}^C) that is associated with the alternative hypothesis (for fixed parameters $\delta, \Psi,$ or ϵ)
3. If the overall test statistic is equal to or above the balancing critical value, stop here. That is, if $B_{ALEC-1}^C < Z_{ALEC-1}^T$, stop here. Otherwise, go to step 4.
4. Calculate the Parity Gap by subtracting the value of step 2 from that of step 1. $ABS(Z_{ALEC-1}^T - B_{ALEC-1}^C)$
5. Calculate the Volume Proportion using a linear distribution with slope of $1/4$. This can be accomplished by taking the absolute value of the Parity Gap from step 4 divided by 4; $ABS((Z_{ALEC-1}^T - B_{ALEC-1}^C) / 4)$. All parity gaps equal or greater to 4 will result in a volume proportion of 100%.
6. Calculate the Affected Volume by multiplying the Volume Proportion from step 5 by the Total Impacted ALEC-1 Volume (I_c) in the negatively affected cell; where the cell value is negative.
7. Calculate the payment to ALEC-1 by multiplying the result of step 6 by the appropriate dollar amount from the fee schedule.
8. Then, ALEC-1 payment = Affected Volume_{ALEC1} * \$\$ from Fee Schedule

Example: ALEC-1 Missed Installation Appointments (MIA) for Resale POTS.

Note -- the statistical results are only illustrative. They are not a result of a statistical test of this data.

	n_I	N_C	I_c	MIA_I	MIA_C	Z_{ALEC-1}^T	C_B	Parity Gap	Volume Proportion	Affected Volume
State	50000	600	96	9%	16%	-1.92	-0.21	1.71	0.4275	
Cell						Z_{ALEC-1}				
1		150	17	0.091	0.113	-1.994				8
2		75	8	0.176	0.107	0.734				
3		10	4	0.128	0.400	-2.619				2
4		50	17	0.158	0.340	-2.878				8
5		15	2	0.245	0.133	1.345				
6		200	26	0.156	0.130	0.021				
7		30	7	0.166	0.233	-0.600				3
8		20	3	0.106	0.150	-0.065				2
9		40	9	0.193	0.225	-0.918				4
10		10	3	0.160	0.300	-0.660				2

29

where n_I = ILEC observations and n_C = ALEC-1 observations

Payout for ALEC-1 is (29 units) * (\$100/unit) = \$2,900

Example: ALEC-1 Order Completion Interval (OCI) for Resale POTS

	n_I	n_C	I_c	OCI_I	OCI_C	Z_{ALEC-1}^T	C_B	Parity Gap	Volume Proportion	Affected Volume
State	50000	600	600	5days	7days	-1.92	-0.21	1.71	0.4275	
Cell						Z_{ALEC-1}				
1		150	150	5	7	-1.994				64
2		75	75	5	4	0.734				
3		10	10	2	3.8	-2.619				4
4		50	50	5	7	-2.878				21
5		15	15	4	2.6	1.345				
6		200	200	3.8	2.7	0.021				
7		30	30	6	7.2	-0.600				13
8		20	20	5.5	6	-0.065				9
9		40	40	8	10	-0.918				17
10		10	10	6	7.3	-0.660				4

133

where n_I = ILEC observations and n_C = ALEC-1 observations

Payout for ALEC-1 is (133 units) * (\$100/unit) = \$13,300

TIER-2 CALCULATION for RETAIL ANALOGUES:

1. Tier-2 is triggered by three consecutive monthly failures of any Tier 2 Remedy Plan submetric.
2. Therefore, calculate monthly statistical results and affected volumes as outlined in steps 2 through 6 for the ALEC Aggregate performance. Determine average monthly affected volume for the rolling 3 month period.
3. Calculate the payment to State Designated Agency by multiplying average monthly volume by the appropriate dollar amount from the Tier-2 fee schedule.

Therefore, State Designated Agency payment = Average monthly volume * \$\$ from Fee Schedule

Example: ALEC-A Missed Installation Appointments (MIA) for Resale POTS

State	n_I	n_C	I_c	MIA_I	MIA_C	Z_{ALEC-A}^T	C_B	Parity Gap	Volume Proportion	Affected Volume
Month 1	180000	2100	336	9%	16%	-1.92	-0.21	1.71	0.4275	
Cell						Z_{ALEC-A}				
1		500	56	0.091	0.112	-1.994				24
2		300	30	0.176	0.100	0.734				
3		80	27	0.128	0.338	-2.619				12
4		205	60	0.158	0.293	-2.878				26
5		45	4	0.245	0.089	1.345				
6		605	79	0.156	0.131	0.021				
7		80	19	0.166	0.238	-0.600				9
8		40	6	0.106	0.150	-0.065				3
9		165	36	0.193	0.218	-0.918				16
10		80	19	0.160	0.238	-0.660				9

99

where n_I = ILEC observations and n_C = ALEC-A observations

Assume Months 2 and 3 have the same affected volumes. Payout 99 units * \$300/unit = \$29,700.

TIER-1 CALCULATION FOR BENCHMARKS

1. For each ALEC, with five or more observations, calculate monthly performance results for the State.
2. ALECs having observations (sample sizes) between 5 and 30 will use Table I below. The only exception will be for Collocation Percent Missed Due Dates.

Table I **Small Sample Size Table**
 (95% Confidence)

Sample Size	Equivalent 90% Benchmark	Equivalent 95% Benchmark	Sample Size	Equivalent 90% Benchmark	Equivalent 95% Benchmark
5	60.00%	80.00%	16	75.00%	87.50%
6	66.67%	83.33%	17	76.47%	82.35%
7	71.43%	85.71%	18	77.78%	83.33%
8	75.00%	75.00%	19	78.95%	84.21%
9	66.67%	77.78%	20	80.00%	85.00%
10	70.00%	80.00%	21	76.19%	85.71%
11	72.73%	81.82%	22	77.27%	86.36%
12	75.00%	83.33%	23	78.26%	86.96%
13	76.92%	84.62%	24	79.17%	87.50%
14	78.57%	85.71%	25	80.00%	88.00%
15	73.33%	86.67%	26	80.77%	88.46%
			27	81.48%	88.89%
			28	78.57%	89.29%
			29	79.31%	86.21%
			30	80.00%	86.67%

3. If the percentage (or equivalent percentage for small samples) meets the benchmark standard, stop here. Otherwise, go to step 4.
4. Determine the Volume Proportion by taking the difference between the benchmark and the actual performance result.
5. Calculate the Affected Volume by multiplying the Volume Proportion from step 4 by the Total Impacted ALEC₋₁ Volume.
6. Calculate the payment to ALEC-1 by multiplying the result of step 5 by the appropriate dollar amount from the fee schedule.

ALEC-1 payment = Affected Volume_{ALEC-1} * \$\$ from Fee Schedule

Example: ALEC-1 Percent Missed Due Dates for Collocations

	n _c	Benchmark	MIA _c	Volume Proportion	Affected Volume
State	600	10%	13%	.03	18

Payout for ALEC-1 is (18 units) * (\$5000/unit) = \$90,000

TIER-1 CALCULATION FOR BENCHMARKS (in the form of a target):

1. For each ALEC with five or more observations calculate monthly performance results for the State.
2. ALECs having observations (sample sizes) between 5 and 30 will use Table I above.
3. Calculate the interval distribution based on the same data set used in step 1.
4. If the 'percent within' (or equivalent percentage for small samples) meets the benchmark standard, stop here. Otherwise, go to step 5.
5. Determine the Volume Proportion by taking the difference between benchmark and the actual performance result.
6. Calculate the Affected Volume by multiplying the Volume Proportion from step 5 by the Total ALEC₋₁ Volume.
7. Calculate the payment to ALEC-1 by multiplying the result of step 6 by the appropriate dollar amount from the fee schedule.

$$\text{ALEC-1 payment} = \text{Affected Volume}_{\text{ALEC1}} * \$\$ \text{ from Fee Schedule}$$

Example: ALEC-1 Reject Timeliness

	n _c	Benchmark	Reject Timeliness	Volume Proportion	Affected Volume
State	600	95% within 1 hour	93% within 1 hour	.02	12

$$\text{Payout for ALEC-1 is (12 units) * (\$100/unit) = } \underline{\underline{\$1,200}}$$

TIER-2 CALCULATIONS for BENCHMARKS:

Tier-2 calculations for benchmark measures are the same as the Tier-1 benchmark calculations except the ALEC Aggregate data is evaluated over a three consecutive month period.