

Lisa S. Foshee
Senior Corporate Counsel - Regulatory

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0754

July 24, 2002

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

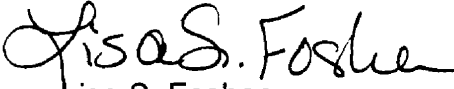
Re: 960786B-TL and 981834-TP (Section 271)

Dear Mrs. Bayó:

Enclosed is the original and fifteen copies of BellSouth Telecommunications, Inc.'s Comments regarding the Florida OSS Third Party Test Evaluation which should be filed in the above referenced dockets.

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 by E-mail or Federal Express as shown on the attached Certificate of Service.

Sincerely,


Lisa S. Foshee (LW)

Enclosures

cc: All Parties of Record
Marshall M. Criser III

DOCUMENT NUMBER: DATE

07751 JUL 24 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
DOCKET NO. 960786-B-TL and 981834-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by e-mail (*) or Federal Express this 24th day of July, 2002 to the following:

Mr. Brian Sulmonetti (+)
LDDS WorldCom Communications
Suite 3200
6 Concourse Parkway
Atlanta, GA 30328
Tel. No. (770) 284-5493
Fax. No. (770) 284-5488
brian.sulmonetti@wcom.com

Charles J. Beck
Office of Public Counsel
111 W. Madison Street
Suite 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax No. (850) 488-4992
Beck.Charles@leg.state.fl.us

Floyd R. Self, Esq. (+)
Messer Law Firm
215 South Monroe Street
Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents LDDS/e.spire
fself@lawfla.com

Richard D. Melson (+)
Gabriel E. Nieto
Hopping Green Sams & Smith
123 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Represents MCI, Rhythms &
ACI Corp.
RMelson@hgss.com

Vicki Gordon Kaufman (+)
Joseph A. McGlothlin (+)
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Represents FCCA
Represents NewSouth
Represents KMC
Represents NuVox Comm.
Represents ACCESS
Represents XO
Represents Network Telephone
Represents Bluestar
vkaufman@mac-law.com
jmcglothlin@mac-law.com

Susan S. Masterton (+)
Sprint Communications Co.
Post Office Box 2214 (zip 32316-2214)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. (850) 599-1560
Fax (850) 878-0777
susan.masterton@mail.sprint.com

Beth Keating, Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us

Scott Sapperstein
Intermedia Comm., Inc.
One Intermedia Way
MCFLT-HQ3
Tampa, Florida 33647-1752
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923
Sasapperstein@intermedia.com

Claudia E. Davant
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6360
Fax. No. (850) 425-6361
cdavant@att.com

Virginia C. Tate (+)
Senior Attorney
AT&T Communications of
the Southern States, Inc.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-4196
Fax No. (404) 877-7648
vctate@att.com

Kenneth A. Hoffman, Esq. (+)
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
215 South Monroe Street
Suite 420
P.O. Box 551
Tallahassee, FL 32302
Tel No. (850) 681-6788
Fax. No. (850) 681-6515
Represents TCG
Represents US LEC
Ken@Reuphlaw.com

Mr. Greg Lunsford
US LEC of Florida, Inc.
6801 Morrison Blvd.
Charlotte, NC 28211-3599
Tel. No. (704) 319-1946
Fax No. (704) 602-1946
glunsford@uslec.com

John R. Marks, III
215 South Monroe Street
Suite 130
Tallahassee, FL 32301
Tel. (850) 222-3768
Fax. (850) 561-0397
Represents BellSouth
JohnM@KMRlaw.com

Kenneth S. Ruth
Florida Director CWA
2180 West State Road 434
Longwood, FL 32779
Tel. (407) 772-0266
Fax. (407) 772-2516
Kruth@cwa-union.org

Marilyn H. Ash (*)
MGC Communications, Inc.
3301 N. Buffalo Drive
Las Vegas, NV 89129
Tel. No. (702) 310-8461
Fax. No. (702) 310-5689

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Mr. Don Sussman (*)
Network Access Solutions
13650 Dulles Technology Drive
Herndon, VA 20171-4602
Tel. No. (703) 793-5102
Fax No. (208) 445-7278
dsussman@nas-corp.com

Michael Gross/Charles Dudley (+)
FCTA, Inc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Nanette Edwards
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
Fax. No. (256) 382-3969
Represented by Hopping Law Firm
NEdwards@itcdeltacom.com

Donna McNulty (+)
MCI WorldCom
325 John Knox Road
Suite 105
Tallahassee, FL 32303-4131
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mculty@wcom.com

Karen Camechis (+)
Pennington Law Firm
215 South Monroe Street
2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Represents Time Warner
karen@penningtonlawfirm.com

Rhythms Links, Inc. (*)
6933 South Revere Parkway
Suite 100
Englewood, CO 80112
Tel. No. (303) 476-4200
Represented by Hopping Law Firm

Benjamin Fincher (*)
Sprint/Sprint-Metro
3100 Cumberland Circle
#802
Atlanta, GA 30339

Tel. No. (404) 649-5144
Fax. No. (404) 649-5174
Represented by Ervin Law Firm

Carolyn Marek
Time Warner
Regulatory Affairs, SE Region
233 Bramerton Court
Franklin, TN 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
carolyn.marek@twtelecom.com
Represented by Pennington Law Firm
Represented by Parker Poe Adams

James Falvey
e.spire Communications, Inc.
7125 Columbia Gateway Drive
Suite 200
Columbia, MD 21046-2506
Tel. No. (301) 361-4200
Fax. No. (301) 361-4277
jim.falvey@espire.net

Matthew Feil (+)
Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
mfeil@floridadigital.net

Michael Sloan (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 295-8458
Fax No. (202) 424-7645
Represents FDN
mcsloan@swidlaw.com

Charles J. Pellegrini/Patrick Wiggins
Katz, Kutter Law Firm (+)
106 E. College Avenue
Tallahassee, FL 32301
Tel. No. 850-224-9634
Fax. No. 850-224-9634
pkwiggins@katzlaw.com

Ms. Keiki Hendrix
NewSouth Communications
Two North Main Street
Greenville, South Carolina 29601-2719
Tel. No. (864) 672-5976
Fax. No. (864) 672-5105
Khendrix@newsouth.com

Genevieve Morelli
Andrew M. Klein (+)
Kelley Drye & Warren LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036
Tel. No. (202) 887-1257
Fax. No. (202) 955-9792
AKlein@KelleyDrye.com
Represents KMC

John D. McLaughlin, Jr.
Director, State Government Affairs
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, Georgia 30043
Tel. No. (678) 985-6262
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Suzanne F. Summerlin, Esq.
2536 Capital Medical Blvd.
Tallahassee, Florida 32309
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589
Represents IDS Telecom
summerlin@nattally.com

Peggy Rubino
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd.
Suite 220
Tampa, FL 33602-5706
Tel. No. (813) 233-4611
Fax No. (813) 233-4620
prubino@z-tel.com

Henry C. Campen, Jr. (+)
Parker, Poe, Adams & Bernstein, LLP
P.O. Box 389
First Union Capital Center
150 Fayetteville Street Mall, Suite 1400
Raleigh, NC 27602-0389
Tel. No. (919) 890-4145
Fax. No. (919) 834-4564
Represents US LEC of Florida
Represents NuVox Comm.
Represents XO
Represents Time Warner
henrycampen@parkerpoe.com

William H. Weber
Covad Communications
1230 Peachtree Street, NE
19th Floor
Atlanta, GA 30309
Tel. No. (404) 942-3494
Fax. No. (404) 942-3495
wweber@covad.com

Bruce Culpepper, Esq. (*)
Akerman, Senteriff & Eidson
301 South Bronough Street
Suite 200
Post Office Box 10555
Tallahassee, FL 32302-2555
Attys. for AT&T

Mark D. Baxter (*)
Stone & Baxter, LLP
557 Mulberry Street
Suite 1111
Macon, Georgia 31201-8256
Tel. No. (912) 750-9898
Fax No. (912)-750-9899
Represents ACCESS

Dana Shaffer
XO Communications, Inc.
105 Molloy Street, Suite 300
Nashville, Tennessee 37201-2315
Tel. (615) 777-7700
Fax. (615) 345-1564
dana.shaffer@xo.com
Represented by Parker Poe Adams

Ms. Beverly Menard
c/o Margo Hammar
106 E. College Avenue, Suite 810
Tallahassee, FL 32301-7704
Tel. No. (813) 483-2526
Fax No. (813) 223-4888
beverly.menard@telops.gte.com

Kimberly Caswell
Verizon
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870
kimberlycaswell@verizon.com

David Tobin (*)
Tobin & Reyes, P.A.
7251 West Palmetto Park Road
Suite 205
Boca Raton, FL 33433
Tel. No. (561) 620-0656
Fax. No. (561) 620-0657
Represents FPTA

Mark Buechele
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4236
Fax. No. (305) 443-6638
mbuechele@stis.com

Laura L. Gallagher (*)
Laura L. Gallagher, P.A.
101 E. College Avenue
Suite 302
Tallahassee, FL 32301
Tel. No. (850) 224-2211
Fax. No. (850) 561-3611
Represents MediaOne

Betty Willis (*)
ALLTEL Comm. Svcs. Inc.
One Allied Drive
Little Rock, AR 72203-2177
Tel. No. (501) 905-8330
Fax No. (501) 905-6299

Development Specialists, Inc.
Norton Cutler (*)
c/o Steve Victor
70 West Madison Street, Suite 2300
Chicago, IL 60602-4250
Tel. No. (312) 263-4141
Fax. No. (312) 263-1180

Terry Monroe (*)
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585

Dulaney L. O'Roark (+)(*)
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488

Ms. Lisa A. Riley
ACC Business
1200 Peachtree Street, N. E.
Suite 8066
Atlanta, GA 30309-3523
Tel. No. (404) 810-7812
Fax No. (404) 877-7646
lriley@att.com

Mr. Steven T. Brown
Access Integrated Networks, Inc.
4885 Riverside Drive, Suite 107
Macon, GA 31210-1164
Tel. No. (478) 476-7940
Fax No. (478) 405-3175
steve.brown@accesscomm.com

Mr. Angel Leiro
IDS Telcom LLC
1525 N. W. 167th Street, Suite 200
Miami, FL 33169-5131
Tel. No. (305) 612-4311
Fax No. (305) 612-3027
aleiro@idstelcom.com

Andrew Isar
Miller Isar, Inc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98333
Tel. No. (253) 851-6700
Fax No. (253) 851-6474
aisar@millerisar.com

Brent McMahan (*)
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501-5937
Tel. No. (850) 432-4855
Fax No. (850) 437-0724


Lisa Foshee (CA)

(+) Signed Protective Agreement

July 24, 2002

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION
Tallahassee, FL 32399-0870
Florida OSS Third Party Test Evaluation
Comments of BellSouth Telecommunications, Inc.**

TABLE OF CONTENTS

SECTION	SUBJECT	PAGE NO.
I	Introduction	3
II	History of Florida OSS Test	4
III	Florida OSS Test Overview	8
IV	Florida OSS Test Results	13
V	ALEC Workshop Q&A	87
VI	Data Validation	101
VII	Summary of Florida Performance Metrics Audit Status	122
VIII	Florida Commercial Data Review	124
IX	Checklist Items	127
X	Conclusion	133

INTRODUCTION

The purpose of these comments is to provide the Commission with additional information about the Florida Operational Support System ("OSS") test conducted by KPMG Consulting, ("KCI") and about the results produced during the test and reported in the Draft Final Report (Report) issued on June 21, 2002.

The Federal Communications Commission's ("FCC's") New York Order (§§89)¹ emphasizes that commercial or operational readiness can be evidenced in several ways: actual commercial usage, carrier-to-carrier testing, independent third-party testing, and internal testing. The FCC has repeatedly stated that actual commercial usage is the most probative evidence that OSS functions are operationally ready (e.g., New York Order, §§89). BellSouth's interfaces have been used commercially for several years. As has been shown, the levels of commercial usage alone clearly demonstrate the operational readiness of these interfaces. The interfaces, however, have also been subjected to extensive third party testing originally under the direction of the Georgia Public Service Commission (GPSC) and now the Florida Public Service Commission ("FPSC").

In §100 of its New York Order, the FCC stated "the persuasiveness of a third-party review is dependent on the conditions and scope of the review." In addition to scope, depth, and surrounding conditions, the following qualities led the FCC "...to treat the conclusions in the KCI Report as persuasive evidence of Bell Atlantic's OSS readiness. These qualities are: independence, military-style

¹ *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, Memorandum Opinion and Order, 15 FCC Rcd 3953 (1999) ("New York Order").

testing philosophy, efforts to place themselves in the position of an actual market entrant, and efforts to maintain blindness when possible. The independent third party OSS Test ordered by the FPSC has all of those qualities. In fact, as BellSouth proceeded through 271 hearings throughout its nine-state region, intervening ALECs held the Florida OSS Test up as the standard of comparison and pointed to alleged inadequacies of the Georgia OSS Test based on the Florida OSS Test's comprehensiveness. The FL OSS Test is a comprehensive test that tested all aspects of the ALEC experience, as identified by ALECS and incorporated into the Florida Master Test Plan. This FPSC will find that this test provided for extensive third party testing of BellSouth's Operational Support Systems and supporting wholesale processes.

HISTORY OF THE FL OSS TEST

On May 28, 1999, the Florida Competitive Carriers Association ("FCCA") and AT&T Communications of the Southern States, Inc. ("AT&T" or "FCCA/AT&T") filed a Motion for Independent Third Party Testing of BellSouth's Operational Support Systems. BellSouth filed its Response to this Motion on June 16, 1999. That same day, FCCA and AT&T filed a Supplement to the Motion for Third Party Testing. On June 17, 1999, ACI Corp. (ACI) filed a Motion to Expand the Scope of Independent Third Party Testing with the FPSC. On June 28, 1999, BellSouth responded to the Supplement filed by FCCA and AT&T. On June 29, 1999, BellSouth responded to ACI's Motion to Expand the Scope of Independent Third Party Testing.

By Order No. PSC-99-1568-PAA-TP, issued August 8, 1999, the FPSC denied the motion. Upon its own motion, the FPSC implemented Phase I of the Staff's proposal regarding third party testing of BellSouth's OSS. Phase I of the third party testing required a third party, in this case KPMG Consulting, to develop a Master Test Plan ("MTP"), that would identify the specific testing activities necessary to demonstrate non-discriminatory access and parity of BellSouth's systems and processes.

Implementation of Phase I of the Staff's testing plan required the development of a MTP that was used to evaluate BellSouth's OSS interfaces and processes used to provide pre-ordering, ordering, provisioning, maintenance and repair, and billing functions to Alternative Competitive Exchange Carriers ("ALECs"). The purpose of the plan and the subsequent test was to provide sufficient information to allow the FPSC to fulfill its consultative role under Section 271 of the Telecommunications Act of 1996, (the Act), with regard to BellSouth's provision of OSS.

The FPSC Staff met with KCI, BellSouth, and ALECs to discuss administrative and confidentiality concerns in proceeding with Phase I. A weekly conference call schedule was established in order to keep all parties aware of the MTP progress. Additionally, the FPSC established an OSS Testing website to communicate pertinent information to interested parties. The website includes information about the testing process, documents, reports and results.

On September 29, 1999, KCI published a draft MTP. The FPSC Staff and KCI conducted a formal workshop on October 15, 1999, for the purpose of receiving questions and comments on the draft MTP. All parties were in attendance. Thereafter, the parties filed formal comments on the draft test plan on October 29, 1999. Throughout the month of November, the FPSC Staff worked with KCI to ensure all appropriate concerns were incorporated into the MTP. A final MTP was published by KCI on December 2, 1999.

By Order No. PSC-00-0104-PAA-TP, issued January 11, 2000 the Commission approved the KCI MTP and initiated Phase II of third party testing of BellSouth's OSS. On February 8, 2000, by Order No. Order No. PSC-00-0260-PAA-TP, the Commission approved interim performance metrics to be used during the course of testing to assess the level of service BellSouth is providing to ALECs. By Order No. PSC-00-0563-PAA-TP, issued March 20, 2000, the Commission approved the retail analogs/benchmarks and the statistical methodology that should be used during the OSS third party testing.

By Order No. PSC-00-2451-PAA-TP, issued December 20, 2000, the Commission approved revised interim performance metrics, benchmarks and retail analogs to be used during the third party OSS testing. The revised interim metrics were ordered to address several changes made to BellSouth's initial set of interim metrics approved by Order No. PSC-00-0260-PAA-TP. The revised interim metrics included corrections to the business rules used to calculate the metrics and additional levels of detail allowing the metrics to capture BellSouth's performance on newer services, such as Local Number Portability (LNP). Since

Order No. PSC-00-2451-PAA-TP, BellSouth has issued additional changes to the revised interim metrics in other jurisdictions. By Order No. PSC-01-1428-PAA-TL, issued July 3, 2001, the Commission approved additional changes to update metrics and retail analogs and provide additional levels of disaggregation.

On April 3, 2002, by Order No. PSC-02-0340-TP, the Commission revised the Master Test Plan for Testing BellSouth Telecommunications, Inc.'s Operational Support Systems to remove the RoboTAG interface from testing. On June 21, 2002, KCI published the Report.

KCI, under the direction of the FPSC Staff, held approximately 130 weekly ALEC status calls, 130 ALEC Exception calls, 130 ALEC Observation calls and 15 face-to-face workshops and meetings. ALECs have been extensively involved in every aspect of the test, including these calls and meetings as described in the MTP. ALECs participated in transaction testing via KCI interviews and information sharing regarding the ALEC OSS experience. In short, ALECs have had input every step along the FL OSS Test journey over the past 2 ½ years.

FL OSS TEST OVERVIEW

The overall test of BellSouth's OSS was designed to be multi-faceted and provide end-to-end coverage of the systems, interfaces and processes that enable ALECs to compete with BellSouth for customers' local telephone service. In determining the breadth and depth of the test, all stages of the ALEC-ILEC relationship were considered. These included the following:

- Establishing the relationship

- Performing daily operations
- Maintaining the relationship

Further, each of the service delivery methods — resale, unbundled network elements (“UNE”) and combinations of UNEs, including the UNE Platform (“UNE-P”) were included in the scope of the test. The plan was divided into three test families to organize and facilitate testing:

- Performance Metrics Review (PMR)
- Policies and Procedures Review (PPR)
- Transaction Validation and Verification (TVV)

The areas subject to testing that mirror the major business functions performed by a telecommunications carrier (ILEC or ALEC) were:

- Relationship Management and Infrastructure (RMI) which included Account Team, ALEC Training and Change Management
- Order Management (OM) for Preordering and Ordering of services
- Provisioning of services
- Maintenance and Repair Services (RPM for Repair, Provisioning and Maintenance)
- Billing (BLG) of services provided
- Metrics testing of the Service Quality Measurements (“SQM”) ordered by the FPSC

Within each of the test families, the test plan described the methods and processes used to measure BellSouth's performance along with the specific points in the systems

and processes where KCI evaluated BellSouth performance. The results of the test were compared against measures and criteria established by the FPSC in the SQM, or established by KCI if measures did not exist.

The plan also described the development and application of scenarios to be used within the TVV test families in evaluating BellSouth's OSS and related support services. KCI developed these scenarios to test the functionality of BellSouth's pre-ordering and ordering, provisioning maintenance and repair and billing systems. KCI used scenarios to develop test cases that provided a detailed description of the transactions and introduced additional variables, such as errors and supplements to further simulate real world transactions. In addition, KCI submitted live transactions through coordination with ALECs. BellSouth finds fault in some of the test scenarios submitted by KCI. The test was conducted using the latest BellSouth interfaces in production. The interfaces included the Trouble Administration Facilitation Interface ("TAFI"), Electronic Communication Trouble Administration ("ECTA"), Optional Daily Usage File ("ODUF"), Access Daily Usage File ("ADUF"), Customer Record Information System ("CRIS"), Carrier Access Billing System ("CABS"), Integrated Billing Solution (IBS/Tapestry), Local Exchange Navigation System ("LENS") - a Graphical User Interface (GUI), Telecommunications Access Gateway ("TAG"), - a machine-to-machine interface and Electronic Data Interchange ("EDI") - a batch-driven machine-to-machine interface. Manual order processing was also a component of the FL test. Additionally, the test was conducted using the most current release of the BellSouth business rules at the time of the test.

The test adopted the military-style test philosophy, which suggested a “test until you pass” approach. The issuance of Exceptions and Observations associated with a military style process is described in detail in the MTP on page 4.

The test covered over a thousand test points or evaluation criteria over the testing period. The Report includes all the test points, test history and test results. The Report should be viewed in two phases. The first phase includes OM, RMI, RPM, and BLG. The second phase is for the metrics test. BellSouth upgraded its metrics-reporting platform with the April metrics reports so KCI is now retesting all the metrics test points, thus these test points are rated as “Testing in Progress” in the Report.

In the first phase of the test, 94% of the evaluation criteria were satisfied while 3% remain testing in progress and 3% were shown as not satisfied. BellSouth expects all testing in progress evaluation criteria for phase one to be completed and satisfied when the Report is updated and issued as Version 2 on July 30, 2002. When considering just the evaluation where KCI has reached conclusion, i.e.: satisfied or not satisfied evaluation criteria, BellSouth’s success rate is at 97%. This overwhelming success rate combined with BellSouth’s commercial data provides conclusive evidence that BellSouth provides non-discriminatory access and parity to ALECs in the state of Florida.

The specific results for each test domain, as published in the Report on June 21, 2002 are as follows:

Domain	Satisfied	Not Satisfied	Testing in Progress	Total
Order Management	105	4	1	110
Billing	81	0	6	87
Relationship Mgmt Infrastructure	67	7	0	74
Repair Provisioning & Maintenance	202	4	7	213
Phase I Total	455 ²	15	14	484
%	94%	3%	3%	100%

The Report did identify a few areas where BellSouth did not meet the standards established by either the FPSC or KCI. None of these not satisfied reflects an impediment to local competitors. In addition, under the guidance of the FPSC and the FCC, BellSouth will continue to make changes and improve both processes and results to address these few issues. It is important, however, to review the Report in its totality and not to focus, as the ALECs undoubtedly will, on the few not satisfied criteria. When viewed in total, there is no doubt that BellSouth successfully completed the test.

BellSouth satisfied 97% of the evaluation criteria providing further proof that BellSouth provides non-discriminatory access to its OSS.

² These totals differ by one from KCI's Executive Summary due to discrepancies between KCI's Report and the Executive Summary. The above table is based on the individual test results.

Florida OSS Test Results

The following sections on each test domain provide the detailed results, along with an assessment of the few not satisfied evaluation criteria.

RMI Domain

The Relationship Management and Infrastructure (RMI) domain evaluated BellSouth's processes that support establishing and maintaining relationships between BellSouth and ALECs. The test examined change management, account establishment and management, help desks, ALEC training, interface development, and forecasting. RMI consisted of five tests, all of which were process-oriented. KCI evaluated 74 evaluation criteria. Sixty-seven were satisfied; seven were not satisfied. The seven not satisfied evaluation criteria resulted from overlapping issues associated with three Exceptions: 88, 123, and 157. The results of the five RMI Test points are discussed in the following paragraphs.

(PPR1) Change Management Practices Verification and Validation Review

The PPR1 review evaluated BellSouth's policies and procedures for managing changes to the OSS interfaces and business processes used by ALECs. KCI tested the change management practices associated with changes initiated by either BellSouth or an ALEC. Additionally, KCI reviewed and evaluated the change management process associated with implementing major software releases. The objective of the test was to determine the adequacy and completeness of procedures for developing, publicizing, conducting, and monitoring change management. To meet these objectives, KCI conducted interviews, attended change management meetings, and performed a comprehensive review of all related documents.

KCI had the very difficult task of trying to evaluate the Change Control Process, ("CCP") which by design is evolutionary in nature. This process is characterized by ongoing and in-depth discussions, diversity of interests and opinions, intense negotiations, and eventual resolution and agreement. The process does not always move swiftly, but it always moves forward and is constantly changing. As KCI evaluated the various aspects of the CCP process and specific pending issues, their conclusions erroneously suggest that certain processes and documentation do not exist at all. At the same time, their conclusions do not give proper emphasis to the fact that ongoing discussions regarding the unsatisfied areas indeed prove that the CCP process is working as designed.

The combination of pending issues associated with Exceptions 88 and 123 led KCI to conclude that out of eight change management evaluation criteria, four were satisfied, while four received a "not satisfied result." The fact is that each criterion rated "not satisfied" actually represents a CCP "work-in-progress." with ALECs. With regard to Exception 88, KCI's findings happened to overlay with similar interests raised by the ALECs themselves. As the history of Exception 88 shows, BellSouth has demonstrated a number of good faith efforts to resolve not only the exception, but also the concerns expressed directly by the CLEC community.

One of the first and most difficult issues has been the definition of "CLEC-affecting." BellSouth actually reviewed and gave the nod of approval to three definitions suggested by the ALECs by way of Change Control. After BellSouth agreed to implement the first

one, the ALECs changed their minds and asked that BellSouth investigate and adopt the definition currently in use by Verizon. BellSouth consulted with Verizon and presented the ALECs with a Verizon-based definition. The ALECs then changed their minds about the Verizon definition, ultimately discarding it and making up one of their own. BellSouth has adopted the following definition of CLEC-affecting as written by the CLECs themselves:

Any change that potentially may cause a CLEC to modify the way it operates in conducting wholesale business transactions with BellSouth. Modifications to the way CLECs operate in conducting wholesale business with BellSouth include, but are not limited to: (1) changes to CLEC system code; (2) changes in CLEC employee training; (3) changes to CLEC business methods and procedures at the transaction, clarification, or escalation levels; (4) changes to the work assignments of CLEC personnel. Internal BellSouth process changes (either software or procedural) unique to the CLEC wholesale environment are CLEC affecting. The definition includes a footnote that reads, the procedures described in this document apply to all three groupings of the components of "interfaces" as described by the FCC. These include (1) a point of interface (or gateway); (2) any electronic or manual processing links (transmission links) between the interface and BellSouth's internal operations systems (including all necessary back office systems and personnel); and (3) all of the internal operations support systems (or "legacy systems") that BellSouth uses in providing network elements and resale services to competing carriers.

The remaining issues associated with Exception 88 have likewise been the subjects of ongoing negotiations within the Change Control forum. BellSouth has also proposed

three approaches to allocating release capacity, two methods of providing information on the amount of capacity used year-to-date, and has engaged in numerous discussions with the CLECs concerning the treatment of mandates, defects, and industry releases. Again, the lack of a quick resolution to these and others issues does not suggest a deficiency in the Change Control Process, as KCI would imply. As a result of the ongoing negotiations, and in response to Exception 88, the latest proposal includes the features described below:

- BellSouth's acceptance of new definition of CLEC-affecting
- BellSouth's agreement to give CLECs an estimate of total capacity as they begin to prioritize
- BellSouth's agreement that there will be no set percentages associated with any type of change request
- CLECs will be allocated one-half of production releases for their exclusive use
- Joint agreement between CLECs and BellSouth that mandates and defects will be prioritized ahead of other types of change requests
- BellSouth will provide CLECs with a quarterly capacity utilization report
- Industry releases will be prioritized in accordance with CLEC preference.

To further address the issues identified in the PPR1 test, specifically Exceptions 88 and 123, BellSouth has revised internal documentation, introduced a job aid, and conducted employee training sessions to ensure that both BellSouth and CLEC-initiated defects are classified in accordance with the definition of CLEC-affecting, and that they are communicated through the Change Control Process. BellSouth believes that its latest proposal on prioritization and release management, combined with the updated internal

documents, the job aid, and the additional training, has addressed outstanding concerns associated with Exceptions 88 and 123. In fact, KCI has completed retesting on Exception 123, and BellSouth expects KCI to announce that it has satisfied and is recommending closure on the next Exceptions status call with the ALEC community.

Last, and most importantly, in the Report, KCI stated unequivocally on pages RMI 16-17 and 21 of the Report that BellSouth's proposal, if implemented, would satisfy the outstanding change management evaluation criteria. In addition, the FPSC Staff has similarly endorsed BellSouth's proposed solutions to the open CCP issues. In its recommendation dated June 27, 2002, the Staff concludes, "Staff recommends that at present, the "50/50" proposal, as reflected in the attached document entitled *End-to-End Process Flow, Draft Version 2.1*, be implemented by BellSouth to resolve the Change Control Process impasse." The Florida Commission unanimously adopted the staff recommendation at its agenda on July 23, 2002.

(PPR2) Account Team Management

The Account Establishment and Management Process Verification and Validation Review evaluated BellSouth's policies and practices for establishing and managing relationships with ALEC customers. The objectives of the test were to determine the adequacy, completeness, and compliance with procedures for developing, publicizing, conducting, and monitoring account establishment and management activities. Interviews, documentation reviews, and comparisons were conducted in order to complete this evaluation. There are three BellSouth groups responsible for direct interaction with wholesale customers as they establish accounts and seek ongoing customer support. These groups are: The Advisory Team, the CLEC Care Team, and

Account Team. In addition to the aforementioned activities that KCI performed as an auditor, they also created a "pseudo-ALEC" known as CKS. CKS behaved like an ALEC in every way and went through all steps associated with becoming an ALEC. Once they were fully established, CKS was assigned a BellSouth Account/CLEC Care Team from whom they solicited all manner of post-establishment assistance and support. By acting as an ALEC, KCI was able to fully review and respond to the ALEC experience. As a final activity within the PPR2 review, KCI compared the BellSouth CLEC Account Establishment and Management with retail practices for purposes of evaluating parity.

The Advisory Team is responsible for the account establishment or "CLEC start-up" process. Their activities include facilitating the execution of the interconnection agreement, verifying the creditworthiness of the customer, ensuring the establishment of billing accounts, providing transaction codes, and setting up LENS access. When the ALEC has completed all steps of the "start-up" process, the customer is ready for assignment to the CLEC Care Team. CKS, KCI's pseudo-ALEC, worked directly with the Advisory Team to complete the start-up process. A CLEC Care Team is assigned to those wholesale customers whose local service offerings feature UNE and simple resale products. This group has primary responsibility for ongoing and general customer support in the following areas: Amendments to the interconnection agreement, OSS connectivity and upgrades, pre-order questions, PMAP issues, product questions, and billing queries. As the initial point of contact for a variety of issues, a large part of the CLEC Care Team's role is to determine who will handle the inquiry, educate the customer on the proper groups to call, and to refer the customer accordingly. BellSouth

fully supported CKS with a CLEC Care Team. CKS consulted with and requested assistance from their CLEC Care Team regarding all areas named above.

An Account Team is assigned to those wholesale customers who purchase or expect to purchase premium or complex resale products. Examples of premium products include access services, ISDN, Frame Relay, and ATM. The Account Team is a sales-oriented group whose role is to identify and develop business solutions that incorporate the use of these products. Activities performed by the Account Team include: Developing and presenting sales proposals, designing and pricing integrated communications solutions, keeping the customer apprised of new product offerings/promotions, and performing specific pre-order tasks after the sale has been made. As the role of the Account Team was re-defined near the end of the test, and given the sales objectives of this group, KCI's pseudo-ALEC has limited interaction with the Account Team. However, from an auditing perspective, KCI thoroughly reviewed the Account Team's responsibilities and processes.

KCI's test of the Advisory Team, the CLEC Care Team, and the Account Team contained sixteen evaluation criteria. They evaluated all processes, documentation, and web sites associated with these teams. These efforts included an assessment of staffing, organizational structure, contact and escalation procedures, issue tracking mechanisms and overall timeliness of response. KCI reviewed these areas both in terms of internal practices and documentation as well as those that were ALEC-facing. BellSouth satisfied all sixteen evaluation criteria. The results of this very comprehensive analysis, along with the parity review, show that BellSouth is successfully and

appropriately supporting ALECs in the area of Account Establishment and Management.

(PPR 3) - EC Support Help Desk

The OSS Interface Help Desk Functional Review evaluated BellSouth help desk functions through a process-oriented assessment. The objectives of the test were to verify that processes for the OSS interface help desk were documented; escalation procedures were maintained, documented and published; management oversight procedures were documented and followed; procedures existed for measuring, tracking, projecting, and maintaining OSS interface help desk performance; and reasonable security measures existed to ensure integrity of help desk data.

BellSouth's OSS interface help desk function is managed and implemented by the Electronic Communications (EC) Support Group. This group serves as the initial point of contact for wholesale customers who require technical or administrative support related to the following interfaces: Connect: DIRECT via Transmission Control Protocol/Internet Protocol (TCP/IP), Circuit Provisioning Status System (CPSS), CLEC Service Order Tracking System ("CSOTS"), EC-Interconnection Reference (ICREF), EC-Preferred Interexchange Carrier (EC PIC), ECTA, LENS, PMAP, TAFI, TAG, and Common Access Front End (CAFE). The primary responsibilities of the EC Support Group include resolving OSS technical issues, building company and user profiles for the OSS, and acting as the interface between wholesale customers and the BellSouth Information Technology (IT) Team.

KCI's assessment of the EC Support Group relied upon interviews with members of the EC Support Group, observation of procedures, and reviews of internal and external documentation. The thirteen evaluation criteria associated with this test enabled KCI to assess the following: How well responsibilities were defined and documented; the ease with which customers can initiate and obtain status on a query; internal and external escalation procedures; overall issue tracking and closure procedures; staffing plans; and the process for measuring performance. All thirteen evaluation criteria received satisfactory results. BellSouth is, therefore, successfully and appropriately delivering OSS Help Desk support to ALEC customers.

(PPR4) CLEC Training

The CLEC Training Verification and Validation Review evaluated BellSouth's training program for ALEC. The objectives of the test were to determine the existence and functionality of procedures for developing, publicizing, conducting, managing, and monitoring ALEC training. KCI developed fourteen evaluation criteria in order to execute this test and carefully reviewed all aspects of BellSouth's Professional Training Services organization. Additionally, KCI compared BellSouth's ALEC training program with retail training practices in order to determine the degree of parity.

The organization responsible for ALEC training is known as Professional Training Services. This group offers a comprehensive suite of classes on topics such as BellSouth products and services, pre-ordering and ordering procedures, billing, maintenance, and OSS. Classes are available in three formats, 1) Instructor-led at BellSouth's training center 2) Instructor-led at the ALEC's facility, and 3) Web-based training. In addition to the standard class offerings, the Professional Training Services

group customizes classes based upon the ALEC's need or specific request. Finally, the Professional Training Services group is also responsible for creating and updating many of the CLEC User Guides posted to the BellSouth Interconnection web site.

The fourteen evaluation criteria associated with this test covered the following general areas: How well the training process was defined and documented, that it's scope contained the expected elements, that it covered customer requirements and included customer feedback, that staff assignment and evaluation mechanisms were in place, and that processes existed for evaluating the overall program and adapting it as necessary to meet customer needs. KCI found that BellSouth's training program satisfied each of the fourteen evaluation criteria. In addition, the parity analysis revealed that the Professional Training Services organization is analogous to the retail unit's BellSouth University Customer Care Institute. In summary, not only does the Professional Training Services group successfully meet the training needs of ALEC customers, it also does so in relatively the same manner as its retail counterpart.

(PPR5) OSS Interface Development Verification and Validation Review

The Interface Development Verification and Validation Review evaluated BellSouth's interface development procedures. The objectives of this test were to determine the adequacy, consistency, and completeness of BellSouth's processes for developing, providing, and maintaining OSS interfaces. The review assessed the processes associated with five interfaces used by ALECs to perform electronic pre-ordering, ordering, maintenance, and repair activities. The pre-ordering and ordering interfaces evaluated for this review were the TAG, EDI, and LENS. The maintenance and repair (M&R) interfaces were TAFI and ECTA products. KCI gathered data and information for

its analysis by conducting interviews with BellSouth personnel, reviewing BellSouth's internal and external documentation, and holding discussions with live ALECs. In addition to the aforementioned activities that KCI performed as an auditor, they also created a "pseudo-ALEC" known as CKS. CKS behaved like an ALEC in every way, and submitted pre-ordering, ordering, and M&R transactions via these interfaces. They also received and responded to notices concerning modifications to these systems in the same manner that a normal ALEC would. Thus, KCI was able to fully undergo all aspects of the ALEC experience as related to the use of these interfaces.

KCI established twenty-three evaluation criteria and BellSouth satisfied twenty of them. It is clear that the three criteria that were found to be "not satisfied," all relate back to one issue as identified in Exception 157, and not three separate and distinct issues, as KCI's conclusions tend to suggest. Even the redundant wording of these three criteria clearly illustrates that KCI has allowed one area of concern to inappropriately cause three evaluation criteria to be rated "not satisfied." Note the recurring theme in these three outstanding evaluation criteria:

1. BellSouth has a software/interface development methodology that addresses requirements and specification definition, design, development, testing, and implementation. (PPR5-2)
2. A software and interface development methodology exists that defines the process for release management and control. (PPR5-17)
3. Interface development methodology has a defined quality assurance process. (PPR5-3)

BellSouth not only disagrees with KCI's conclusions, but also asserts that KCI's own findings, as documented in the Report, actually support our position. Below, each of the outstanding evaluation criteria will be addressed and will have quotes provided from sections of the Report that contradict KCI's unsatisfactory ratings.

First, BellSouth has a software/interface development methodology that addresses requirements and specification definition, design, development, testing, and implementation. (PPR5-2)

Second, a software and interface development methodology exists that defines the process for release management and control. (PPR5-17)

KCI's general comment states, "KCI determined that BellSouth has a software/interface development methodology that addresses requirements and specification definition, design, development, testing, and implementation for all interfaces."

KCI's comment on TAG states, "KCI determined that BellSouth employed a complete software/interface development methodology for TAG."

KCI's comment on EDI states, "Refresh interviews conducted with EDI Project Manager on November 7, 2001 and with the BellSouth Carrier-to-Carrier Testing Managers for EDI on November 15, 2001 confirmed that a methodology was in place and was being followed. KCI reviewed BellSouth documentation and monitored CKS activities and confirmed adherence to the interface development methodology."

KCI's comment on TAFI states, "In the CLEC TAFI Specifications document, BellSouth defines system and functional requirements as well as design specifications, system components, testing, and implementation processes for ALECs."

KCI's comment on ECTA asserts, "KCI also monitored interface development efforts by CKS to confirm BellSouth's adherence to the process for ECTA requirements, specification definition, design, development, testing, and implementation. The monitoring of the CKS development of an ECTA interface allowed KCI to determine that the required development information was available to ALECs and also correct."

KCI's closing comment with regard to the software and interface development methodology that defines the process specific to release management and control asserts, "Based on these interviews, and a review of formal documentation, BellSouth has a defined and documented release management process that is adhered to for all ENCORE releases. Release management and version control procedures are defined in the Release Management End-to-End Process Flow document and the Encore Electronic Interface Ordering (EI) Deliverable Application Rolling Release Plan documents."

BellSouth indeed has a software/interface development methodology that addresses all of the areas specified in the first two criteria statements. The defined purpose of PPR5-2 and PPR5-17 is simply to validate *the existence* of a BellSouth methodology. Since the methodology does exist, and KCI validated BellSouth's adherence, it stands to reason that contrary to their rating, BellSouth is performing satisfactorily in these areas.

The third criteria rated “not satisfied,” PPR5-3, addresses whether or not “BellSouth’s interface development methodology has a defined quality assurance process.” This criterion received an unsatisfactory rating not because of the absence of a quality assurance process, but because KCI incorrectly concluded that BellSouth was not following the process. Their comments in the Report state, “KCI determined that the BellSouth interface development methodology documentation includes a quality assurance process. However, as evidenced by the number of defects encountered in BellSouth Releases 10.2 and 10.3, it appears that the BellSouth Quality Assurance process is not consistently followed.” Based upon this finding, KCI issued Exception 157. The basis for this exception, however, is itself faulty. KCI alleges that BellSouth did not “completely test code changes” for Releases 10.2 and 10.3 prior to the releases going into production. In an amendment to the exception, they make the same allegation with regard to Release 10.5. The fact that post-release defects were identified does not necessarily indicate that BellSouth did not “completely test code changes.” These allegations suggest that either KCI is not familiar with BellSouth’s documented testing and quality process, or that they unrealistically expect that the testing process can identify and address one hundred percent of the outcomes that could possibly occur after deploying a major release.

BellSouth in fact has a very comprehensive and robust quality assurance process for pre-release testing. The process includes the following activities and benchmarks: (i) completion of at least 98% of System, Performance and Regression testing; (ii) a test case pass rate of at least 97%; (iii) no Severity 1 defects outstanding; and (iv) no Severity 2 defects outstanding that do not have a path forward for completion and do not have a mechanized workaround. BellSouth’s release schedule allows sufficient time

for appropriate internal pre-release testing. BellSouth's testing cycle includes unit/product testing, system/integration testing, performance testing, regression testing and user acceptance testing. Prior to implementing Release 10.2 and Release 10.3, BellSouth carefully and completely executed all testing activities. Moreover, the results of the testing clearly met BellSouth's standards for readiness. Had they not, BellSouth would not have made the "go" decision to implement these releases. Our specific test results for Releases 10.2 and 10.3 are reflected in the following table:

Criteria	10.2 Results	10.3 Results
98% test completion	100%	99.9%
97% test cases passed	97.93%	98.66%
# Severity 1 defects outstanding	0	0
# Severity 2 defects outstanding	1	1

Of the ten defects that KCI alleges resulted from Release 10.2, most originated from features that had been implemented in prior releases, but had managed to go undetected. In addition, only two of them were classified as high impact and those were corrected in two business days. As for the other eight, they were medium or low impact and were corrected within five days. BellSouth would note that in all cases, the defects were corrected in fewer days than allowed for by CCP guidelines. Similarly, KCI's statements related to the number of defects found after Release 10.3 also skew the facts. While KCI cites thirty-one defects as having resulted from this release, they fail to mention that none of them were high impact, only six were medium impact, and the

remaining items were low impact. BellSouth again corrected these defects in a shorter timeframe than that which is prescribed by CCP guidelines.

With the amendment to Exception 157, KCI uses Release 10.5 to call the quality and adequacy of BellSouth's testing process into question. The fact is, however, that the chronology of events associated with Release 10.5 definitively show that the process works as designed. To summarize, during the last thirty days of the 10.5 release cycle, user acceptance testing and ALEC testing in CAVE were being conducted in parallel. Software defects were identified and corrected, which is a normal part of these processes. However, after installing and testing software patches one week prior to the scheduled release date, BellSouth discovered that six severity level 2 defects³ remained outstanding. BellSouth was unable to develop a plan to correct and retest these items prior to the scheduled release implementation date. Therefore, in order to adhere to our documented quality standards, and to ensure that the ALECs would also have time to test the release, BellSouth appropriately rendered an internal "no-go" decision that delayed the implementation of the release. The ALECs were notified via carrier notification letter and in accordance with CCP guidelines. BellSouth contends that this was the proper course of action under the circumstances. BellSouth further contends that in the case of Release 10.5, the strict adherence to its quality assurance process helped stave off the potential problems and inconvenience that might have resulted had these defects not been identified during the testing phase.

³ Severity level 2 means that system functionality is degraded with serious adverse impact to the user and there is not an effective work-around.

Following the implementation of Release 10.5, BellSouth began routine monitoring and testing to insure that installed software was functioning properly in production.

BellSouth discovered nine issues that affected one to ten LSRs that happened to be in progress during the transition from 10.4 to 10.5. The fact is that in spite of BellSouth's extensive testing of new functionality in each release, it is simply not possible to perform regression testing on every potential combination of orders that might be in-progress at the time of the implementation. In addition to these nine issues, there were five actual defects that BellSouth identified and corrected during the post-production monitoring period. The total impact of these defects was minor because they did not inhibit the ALECs' transition to release 10.5. They were either related to a few orders that were caught in the software transition period, or they were corrected quickly upon detection. If, in the PPR5 review, KCI expected that all possible defects would be identified and corrected prior to every release, then the standard applied is well above any standard applied in the industry. The Commission should make its own assessment of BellSouth's performance.

While BellSouth stands by its testing and quality assurance processes, we are also fully committed to continuously improving these processes. We hear and respond to issues raised in the Change Control Forum, where currently, there are discussions underway concerning modification of the CAVE testing process. To address these issues, BellSouth has proposed a much more streamlined and ALEC-friendly testing methodology. This methodology also has features that will assist in improving defect mitigation for releases. Below are the highlights of BellSouth's proposal:

- Establishing a Testing Profile
- Establish a secure web-based profile

- Test Environment Availability
- Provide pre-release testing
- CAVE access provided for a release until it is necessary to prepare CAVE for next release
- Creating a Test Plan
- Formal Test Agreement will no longer be required
- Majority of the process will now be done on-line
- A BellSouth Test Manager will work with each ALEC who desires to test with BellSouth
- Published Test Case Volumes
- Establish a BellSouth Test Case Catalog (BTCC)
- Provide a broad scope of order and pre-order scenarios
- Will include English scenario description, detail of field-by-field values and definitions, etc.
- Regression Testing
- Allows ALECs to test existing functionality when ALEC has made software and/or hardware changes for new releases
- Supported for all releases currently available in the test environment
- Defect Management Process
- ALECs will advise BellSouth Test Manager when a defect is found
- Test Manager will validate defect
- BellSouth will provide a bulletin to the ALEC community Production Implementation Decision
- Provide status reports during ALEC pre-release testing

- Reports will address ALEC discovered defects, possible workaround and correction status
- BellSouth will host a final status call at end of ALEC test period to obtain ALEC go/no go recommendation for the release
- ALECs will participate in the go/no go decision making process by providing their final recommendation for the release based upon their testing results, which BellSouth will consider in making its final “go/no go” decision

As an additional effort to reduce the number of defects in production releases, BellSouth has engaged a third party vendor to expand its current set of “test deck cases” that are used for both progressive and regressive release testing. This vendor will provide the expanded test deck to the BellSouth software and application partners who support the systems and applications during release development and testing. The vendor will also submit the expanded test deck into the CAVE environment after a release is introduced for ALEC testing. This will provide an added testing “checkpoint” to identify any outstanding defects from a customer or ALEC vantage point.

Finally, BellSouth is also prepared to take the step of addressing defect mitigation efforts from a SQM perspective. On July 9, 2002, the FPSC adopted the Staff recommendation Docket No. 000121-TP that calls for the implementation of three new Change Management (CM) measures within the SQM. One measurement will be designed to quantify how well the software changes perform in production within three weeks after a production release. Specifically, it will measure how many Type 6 change requests having a severity level of 1, 2 or 3 arise during three weeks after

implementation. A second measurement will be based upon how well BellSouth performs in correcting identified software errors within the interval specified by the CCP process. A third measure will be implemented to capture the results of the software validation effort. These measures are described in detail in the Staff recommendation memorandum.

In closing, BellSouth disagrees with the assertions made in Exception 157. The numbers of defects in BellSouth's releases are relatively small, are of minimal impact to the ALEC community, and are corrected in accordance with CCP intervals. Moreover, not only does BellSouth stand by these processes, it seeks and welcomes opportunities to improve them. This is evident by the proposals under discussion within CCP, as well as by BellSouth's willingness to implement service quality measurements on its performance. There is hardly a better indicator of BellSouth's "total quality" commitment to the interface development, testing, and deployment processes.

OM Domain

The Order Management (OM) domain evaluation was developed to test the systems, processes, and other operational elements associated with BellSouth's support for Pre-Order and Order activities for wholesale operations. The test examined functionality, compliance with measurement agreements, and comparable systems supporting BellSouth retail operations. Also included in this domain were peak and stress tests for systems and manual processes, along with an evaluation of flow through percentages for various products offered by BellSouth. OM consisted of five tests, of which three were transaction-oriented and two were process-oriented. KCI evaluated 110 criteria.

One hundred four were satisfied; four evaluation criteria were not satisfied and one criterion is testing in progress. The four not satisfied evaluation criteria resulted from two issues identified in Exceptions 161 and 165. A description of each test follows.

(TVV1) POP FUNCTIONAL EVALUATION TEST.

The Pre-Order, Order and Provisioning (POP) Functional Evaluation was an end-to-end comprehensive review of the functional elements associated with these activities. The test also evaluated the achievement of the prescribed measures, as the performance of these systems was compared both to SQM standards approved by the FPSC, and to KCI's applied standards. The test also included a retail parity analysis. The POP Functional Evaluation (TVV1) reviewed the existence, functionality, accuracy, and behavior of the interfaces associated with BellSouth's support for wholesale pre-order and ordering. The objective of the test was to ensure that systems and processes related to pre-ordering, ordering, and provisioning provided the ALECs with non-discriminatory access to BellSouth's OSS. The test included the submission of live transactions over three types of BellSouth supported interfaces LENS, TAG, EDI, along with manual submissions.

The pre-ordering and the ordering processes were the two transaction processes that were central to the POP Functional Evaluation. Pre-order queries are used by ALECs to validate existing customer address and service information, to inquire and/or validate specific switch capabilities, to select and reserve telephone numbers, and to obtain service order due dates. In response to a pre-order query, BellSouth returns either a valid pre-order response or an error message to the ALEC. The specific pre-order scenarios can be found on page POP-50 of the Report. The ALEC begins the order

process with the origination of an LSR, using the BellSouth technical specifications for the interface, as well as applicable Business Rules detailing format and content requirements for the form and fields. Upon receipt of the LSR, BellSouth returns a Functional Acknowledgment (FA), indicating that the file was received. If the LSR is found to be incomplete or inaccurate, BellSouth returns an error/clarification (ERR/CLR) back to the ALEC. If no errors or omissions are found, the LSR is processed into a service order, a FOC is returned to the ALEC, and the order proceeds to downstream provisioning systems.

KCI established targets for pre-order testing that included creating, sending, receiving, and verifying pre-order transactions for accuracy, completeness, and timeliness. KCI also established targets for testing the order processes that included verification of the accuracy, completeness, and timeliness of responses, receiving the FOC, ERR/CLR responses, and verification of the correct processing of the order as described in the report. There were forty-one evaluation criteria associated with the TVV1 review. These criteria tested and confirmed the following:

- EDI, TAG, and LENS interfaces provide expected order functionality.
- BellSouth systems or representatives provide accurate and complete Firm Order Confirmations (FOCs), Completion Notices (CNs), Missed Appointment (MA) Notifications, as well as accurate LSR status via BellSouth Service order Tracking System (CSOTS). The benchmark for these criteria was 95%. KCI's results indicated that accurate FOCs were returned 96.85% of the time. The

results for CNs, MAs and CSOTS status information were at 96.85%, 97.26%, and 100% time in each area.

- EDI and TAG interfaces provide 95% of Functional Acknowledgements (FAs) within thirty minutes after the order has been received. For EDI, KCI tested this process on three separate occasions and found that FAs were returned in accordance with the prescribed interval 96.69%, 99.37 % and 99.88% of the time respectively. For TAG, KCI's results showed that FA's were returned within 30 minutes 100% of the time. The benchmark was exceeded in all cases.
- BellSouth's EDI and TAG interfaces provide 97% of fully mechanized reject responses within one hour, as prescribed by the 0-8 SQM standard. Actual results for EDI reflected that the interval was met 98.16% of the time. For TAG, the interval was met 98.66% of the time. The results from both interfaces exceeded the applied standard.
- BellSouth's EDI and TAG interfaces provide 85% of partially mechanized rejects responses within ten hours. EDI exceeded the 85% benchmark by meeting this interval 98.04% of the time. For TAG, which was tested multiple times, the results were likewise overwhelmingly successful. TAG returned partially mechanized rejects within ten hours 95.55%, 98.79% 90.80%, and 97.94% of the time respectively.
- BellSouth's EDI, TAG, and LENS interfaces provide 95% of fully mechanized FOC responses within three hours. For EDI, BellSouth results surpassed this

interval 98.85%, 97.98%, and 97.07% of the time respectively. Similar results for TAG were at 98.53% and 98.66% respectively. LENS exceeded the benchmark with results of 98.37%, 100%, and 99.35%.

- BellSouth's EDI, TAG and LENS interfaces provide 85% of partially mechanized FOC responses within ten hours. The results for each interface far exceeded this benchmark. EDI's results were at 92.42%, TAG's at 91.18%, and LENS results were at 87.80%.
- Upon the completion of the service order, BellSouth's EDI and TAG interfaces returned 95% of Completion Notices by 12:00 p.m. on the first business day after the order completes. EDI exceeded this benchmark by returning Completion Notices in accordance with this interval 95.20% of the time. TAG's results were similar with notices being returned 95.33% of the time.
- BellSouth's manual order process provides 95% of Acknowledgements (ACKs) within eight hours after receipt of the LSR. KCI tested this process twice and BellSouth exceeded the benchmark both times by returning ACKs within eight hours 95.35% and 99.41% of the time respectively.
- BellSouth's manual order process returns 85% of FOCs within thirty-six hours after receipt of the LSR. BellSouth's results bettered this benchmark as non-mechanized FOCs were returned within twenty-four hours some 93.24% of the time.

- Upon completion of the service order, BellSouth's manual order process provides 95% of Completion Notifications by 12:00 p.m. on the first business day after the order completes (CNs) within the agreed upon standard interval. The application of this criterion had to be modified because BellSouth's process does not deliver completion notices for manual orders. Instead, KCI measured the timeliness associated with returning the FOCDD. Test results reflected that BellSouth delivered 97.37 % of FOCDD notices within 1 day of the due date.
- BellSouth ordering documents are accurate and complete as affirmed by KCI's documentation review.
- Pre-order/Order field names and formats are compatible as BellSouth successfully returned expected pre-order and order responses 100% of the time.
- Information provided by the BellSouth Help Desk is accurate. BellSouth representatives (Customer Support Manager, LCSC, and CRSG personnel) provided accurate information in response to KCI's LSR queries and requests for assistance with resolving ordering and pre-ordering errors.
- BellSouth's interfaces provided system responses to pre-order requests. KCI test results found that BellSouth handled these requests in an accurate and timely manner.

During the TVV1 test, KCI did identify two issues described in Exceptions 161 and 165. These issues led to a not-satisfied rating for two evaluation criteria. The first evaluation

criteria rated not satisfied evaluated whether or not BellSouth's system or representatives provided accurate and complete Error (ERR)/Clarification (CLR) messages. KCI applied a benchmark of 95% for receipt of accurate ERRs/CLRs. Initial test results reflected BellSouth exceeded this benchmark with results of 96.01% and 96.49% respectively. Given the military-style test philosophy employed by KCI, and the fact that BellSouth clearly exceeded the benchmark on two occasions, there was no valid reason for KCI to have conducted a third re-test. In spite of this, KCI not only conducted the re-test, but also did so using an unrealistic test scenario that represented a situation seldom requested by actual ALECs. When reducing lines on an account, business customers rarely disconnect their main line, which has been printed, published, and advertised to their customers. Instead, they almost always remove a secondary line. During the re-test, one-third of the inaccurate responses returned stemmed from KCI's having submitted orders requesting that the main line be disconnected on a business account. The submission of this scenario caused BellSouth's results to drop to 89.29% and triggered KCI to issue Exception 165. Therefore, BellSouth disagrees with both the unrealistic test scenarios associated with this exception, and with KCI's conclusions. BellSouth will, however, resolve this issue by updating the business rules under the auspices of the Change Control process.

The second criterion that was not satisfied was an analysis of BellSouth's intervals for providing reject (REJ) responses for manual orders. The 0-8 SQM standard calls for 85% of non-mechanized REJs to be returned within 24 hours. This is another instance where BellSouth passed the original tests for this evaluation criterion along with each of the four manual volume tests. KCI again deviated from its own military style test philosophy and elected to retest a test that had already been satisfied. In so doing, KCI

also incorrectly submitted test orders for complex products and services that are processed by the Complex Resale Services Group ("CRSG"), rather than by the LCSC. The O-8 ordering measure applies exclusively to the timeliness of orders handled by the LCSC. KCI inappropriately applied the O-8 measure which adversely impacted BellSouth's results, KCI used those results to issue Exception 161. BellSouth contends, of course, that the assertions made in this exception are invalid. In fact, when the CRSG transaction intervals are excluded, BellSouth returned 100% of the non-mechanized rejects within the time frame set forth in the benchmark. There is ample test data and commercial data reported in the monthly SQMs to demonstrate that BellSouth provides manual rejects in a timely manner. Based upon this data, BellSouth disputes and disagrees with the allegations cited in Exception 161.

The only criteria for which testing is still in progress involves KCI's attempt to submit orders for new Centrex service. Centrex represents an old and outdated solution to business customer's communication needs. While there is limited activity associated with adds, moves, and changes to existing Centrex service, new Centrex is infrequently requested. BellSouth's commercial data supports this fact as it shows that for the year 2001 and 2002, the ALEC community had not submitted a single order for new Centrex service in Florida. BellSouth provided KCI and the Florida Staff with a detailed summary of BellSouth's commercial data with regard to Centrex. In spite of non-existent commercial demand for new Centrex service, KCI submitted orders for new Centrex. They issued Exception 162 to state that BellSouth's documentation for ordering new Centrex was out of date. BellSouth corrected web site references and made appropriate updates to the BBR-LO to clarify new Centrex procedures. KCI attempted a re-test using the revised documentation, but realized that it would not be able to

complete the re-test in time to include results in the July 30, 2002 Report. BellSouth expects this evaluation criteria (TVV1-1-4) to be satisfied in the July 30, 2002 Report.

In summary, BellSouth considers the Pre-Ordering, Ordering, and Provisioning Functional Test to be a critical part of the overall Third Party Test initiative. It is through this test that KCI evaluated BellSouth's ability to meet one of the ALECs' most basic and crucial needs, that of successfully processing their orders. BellSouth's results show that we are doing just that. Out of forty evaluation criteria, thirty-seven were satisfied. Of the remaining three, one was not satisfied due to KCI's having utilized an unrealistic test scenario, while another was not satisfied due to KCI's having misinterpreted the very measure that they were supposed to be testing. Testing for the final criteria, related to new Centrex service, has ceased due to timing constraints, and is expected to be satisfied in the Final Report. Placed in proper context, the areas for which BellSouth received unsatisfactory ratings represent an anomaly and should not overshadow the excellent results which showed that for the majority of criteria, BellSouth exceeded KCI's standards for processing ALEC orders in an accurate and timely manner.

(TVV2) POP Volume Performance Test

The Pre-Order, Order and Provisioning (POP) Volume Performance Test was designed to evaluate how well BellSouth's systems and processes for pre-ordering, ordering, and provisioning would perform under heavy volume conditions. For purposes of this test, projected volumes for March 2003 were used. KCI evaluated the high volume responses of EDI, TAG, and LENS, as well as BellSouth's ability to process large volumes of orders submitted manually.

Using the instructions and intervals outlined in the BellSouth Business Rules for Local Ordering, KCI submitted pre-order and ordering transactions in order to examine the responsiveness and timeliness of BellSouth's systems. The test was conducted in three parts: (i) two normal volume test using anticipated transaction volumes for the March 2003 time frame, (ii) a peak test using volumes at 150% (1.5 times) of the normal volume test, and (iii) a stress test using volumes at 250% (2.5 times) of the normal volume test. The projected transaction volume was determined by analyzing historical ALEC ordering behavior, ALEC forecasts, and BellSouth regional forecasts.

All volume tests were conducted in BellSouth's production environment. Customer test accounts were geographically distributed across multiple Florida central offices, switching/transmission equipment and configurations, and Revenue Accounting Offices (RAOs).

KCI evaluated several test points for each of the three systems and the manual volume process. The points evaluated Functionality, Accuracy, Timeliness, and Completeness of responses. Testing points included:

1. System responses to pre-order queries:
 - a. Timely responses to Address Validation Query by Telephone Number
 - b. Timely responses to Address Validation Query pre-orders
 - c. Timely responses to Appointment Availability Query pre-orders
 - d. Timely responses to Telephone Number Availability Query pre-orders
 - e. Timely responses to Customer Service Records Query pre-orders
 - f. Timely responses to Service Availability Query pre-orders
 - g. Timely responses to Loop Make Up pre-orders

- h. Timely responses to Parsed Customer Service Records Query pre-orders
 - i. Timely responses to Estimated Due Date pre-orders
 - j. Timely responses to Service Availability Query and View Primary Interexchange Carrier/Local Primary Interexchange Carrier pre-orders
2. System required pre-order functionality
 3. Accurate system responses to pre-orders
 4. Providing Functional Acknowledgements
 5. Providing Functional Acknowledgements or synchronous fatal rejects as expected
 6. Providing Fully Mechanized Firm Order Confirmations, Errors, and Clarifications
 7. Providing Firm Order Confirmations, Errors, and Clarification on Manual Orders
 8. System or representatives providing required order functionality
 9. Providing Functional Acknowledgements within the agreed upon standard interval
 10. Providing Fully Mechanized Firm Order Confirmation responses within the agreed upon standard interval
 11. Providing Fully Mechanized Error/Clarification responses within the agreed upon standard interval
 12. Providing Error/Clarification responses within the agreed upon standard interval for Manual orders
 13. Providing Firm Order Confirmation responses within the agreed upon standard interval

On each volume test day, KCI successfully submitted the following quantities of orders for each system as shown below:

Submissions	Normal Day 1 12/20/2001	Normal Day 2 01/28/2002	Peak Test 03/19/2002	Stress Test 04/25/2002
# of Orders Submitted	11,792	11,790	23,025	17,240
# of Pre-Orders Submitted	29,525	29,497	79,148	62,647

The numbers reflected in this table do not include any live transactions submitted by ALEC's on the test days.

After extensive testing and analysis of each of the previously listed test points, KCI was satisfied with each of the test points and all 38 of the evaluation criteria associated with the TVV2 test and KCI considers the entire test area satisfied.

(TVV3) ORDER FLOW-THROUGH EVALUATION TEST

The Order Flow-Through Evaluation assessed the ability of mechanized orders to flow from ALEC through the interface and into BellSouth's ordering system without manual intervention. The interfaces tested included EDI, TAG, and LENS. Orders eligible to flow through are defined in the BellSouth Business Rules for Local Ordering (BBR-LO) and the SQM Plan's LSR Flow-Through Matrix. The list of flow-through orders was updated during the testing period due to BellSouth documentation changes. Such changes were incorporated into the test as they occurred. Only orders flow through eligible orders were included in this evaluation. Supplements and cancellations designed to flow-through were also submitted and tested. KCI monitored all flow-through eligible order transactions submitted during the POP Functional Evaluation

(TVV1) to verify that the orders flowed through in accordance with BellSouth documentation. In addition, KCI conducted an analysis of the BellSouth retail ordering functionality in order to compare the flow-through capabilities of the retail and wholesale systems.

One of the criterion satisfied in the TVV3 test evaluated whether or not BellSouth's systems process residential and business resale and UNE-P order transactions in accordance with published flow-through rules. KCI applied the O-3 SQM measure that calls for a 95% flow-through rate for residence orders, and a 90% rate for business orders. KCI's test results concluded that the residential orders had a 94.13% flow-through rate, which was just slightly lower than the defined benchmark of 95%.

However, KCI allowed that the statistical evidence was not strong enough to conclude that the performance was below the benchmark with 95% confidence. Business order flow-through results were at 91.37%, thus exceeding the 90% objective. Based upon KCI's findings, these evaluation criteria received satisfactory ratings.

Additionally, KCI's review of BellSouth's flow-through documentation found that it was complete, accurate, and clear.

KCI also tested BellSouth systems process for UNE and LNP order transactions in accordance with published flow-through rules. KCI used the O-3 SQM measurement, which calls for an 85% flow-through benchmark for these transaction types. In the initial UNE flow-through test, the flow-through rate was 75%. During additional testing from January 5, 2002, to February 17, 2002, the flow-through rate was 80%. KCI completed another UNE Flow-through test from February 28, 2002, to April 21, 2002. This time the flow-through rate was at 74.53%. KCI concluded that BellSouth did not achieve the

Flow Through benchmark of 85% during the course of the test and thus rated the associated evaluation criteria as not satisfied. BellSouth, however, disagreed with the mix of transactions used for the retest. Approximately 50% of KCI retest transactions were for xDSL loop migrations. This specific product activity represents a mere 0.03% of the total commercial data for the month. Given that the re-test transaction mix contained an unrealistically high number of xDSL migrations, and with proper consideration of the commercial data, BellSouth would argue that KCI's findings are questionable at best when trying to assess actual commercial experience.

For the LNP test, KCI submitted 8 LSRs against a single billing account within 3 days. The CSR for the billing account contained invalid data that caused the 8 LSRs to fall out for manual intervention. This one issue, which was corrected, resulted in a not satisfied rating for the LNP flow-through evaluation criteria. BellSouth's commercial data available through SQM reports also provides a complete and more realistic view of Ordering O-3 results for LNP. BellSouth's LNP results for January 2002 through April 2002 were 92.81%, 94.12%, 92.25% and 92.59% respectively. BellSouth consistently exceeds the 85% benchmark with its monthly commercial data.

BellSouth's commercial data demonstrates that its OSS provides high flow through capability. Furthermore, the FCC considered BellSouth's commercial data in formulating its comments in the Georgia and Louisiana (GALA) Order. The FCC affirmed that " BellSouth's OSS are capable of flowing through UNE orders in a manner that affords competing carriers a meaningful opportunity to compete." It also found that "BellSouth is capable of flowing through resale orders in substantially the same time and manner as it does for its own retail customer orders." GALA Order, ¶ 143

BellSouth's overall flow through results reflect the fact that BellSouth's flow through performance remains strong. This is especially true for ALECs that submit large numbers of requests and yet maintain high flow through rates. The chart below shows the top 5 ALECs by electronic LSR volume. The data covers the entire region and reflects activity that took place during the first quarter of 2002. Note that for live ALECs, the flow through rates for 3 out of the 5 range from 90.19% to 94.64%.

ALEC	Total Mech LSR	% Flow Through
A	294,868	77.06%
B	161,971	90.19%
C	155,179	78.76%
D	107,118	93.53%
E	81,319	94.64%

Flow through rates for individual competing carriers can vary, and the FCC has also recognized "that BellSouth's ability to flow through orders at high rates is dependent, in part, on the ability of the competing carriers." GALA Order, ¶ 145. An analysis of the March 2002 Percent Flow Through Service Requests (Aggregate Detail) report reveals that 246 users experienced a flow through rate in excess of 90%. Of significant note, 39 of these users electronically submitted in excess of 1,000 LSRs with 80 more users submitting between 100 and 999 LSRs. From these 119 users, 30 experienced achieved flow through rates of 90% or higher, and 34 experienced achieved flow through rates between 85.0% and 89.9%. The number of ALECs experiencing higher

flow through rates demonstrates that BellSouth is providing ALECs with electronic interfaces capable of accepting flow through eligible requests.

BellSouth remains committed to improving flow through rates for products ordered by ALECs. In February 2001, BellSouth and the ALECs established the cooperative Flow Through Task Force ("FTTF"), which operates as a subcommittee of the CCP. The FTTF analyzes UNE and Resale LSRs to improve flow through and reduce fall out. The objective of the FTTF is to enhance the flow through of electronic orders, document those enhancements, and develop a schedule for implementing the enhancements. On April 9, 2002, the FTTF had its regular meeting. Following this meeting the FTTF distributed a ballot for the ALECs to prioritize the flow through change requests that had been submitted to the FTTF over the past year. There is a Flow Through Improvement List that identifies those flow-through improvement features, errors, and defects that have already been implemented or are targeted for the next release 10.6. A total of thirty-five items have been identified, thirty-one of which have been implemented. In addition, the ALECs have adopted portions of BellSouth's change management improvement proposal (commonly known as the red line/green line). Flow through change requests initiated by the flow through task team are considered as Type 2 mandates, thus receiving the highest priority rating. These efforts will enhance BellSouth's ability to meet the benchmarks established by the Florida Commission and also the expectations of the FCC where in its Order approving BellSouth's Georgia and Louisiana application, the FCC "note [d] that the Georgia Commission established the FTTF to further improve BellSouth's performance. ...We expect that BellSouth will continue to improve its flow through performance, work with ALECs in workshops, and make requested improvements through the change management process." [Footnotes

omitted.] GALA Order, ¶ 146. These efforts will enhance BellSouth's ability to meet the benchmarks established by the Florida Commission.

Also, on June 27, 2002 the Florida Commission mandated that BellSouth file a specific action plan by July 30, 2002, to further improve the flow-through. These improvements would allow BellSouth to show significant progress toward the mandated benchmarks and would adjust the Self-Effectuating Enforcement Mechanism (SEEM) for the flow-through metric.

(PPR7) POP Manual Order Processing Evaluation

The Pre-order, Order and Provisioning Manual Order Processing Evaluation was a comprehensive analysis of the effectiveness of BellSouth's policies, methods, procedures, guidelines, and documentation used to process manual orders. For purposes of the test, manual orders are defined as those that are sent by fax or electronic mail, as well as those that can be submitted electronically but require manual intervention. KCI conducted this test by way of interviews and observations with personnel at BellSouth's wholesale and retail centers responsible for manually processing orders. Those centers included: CRSG, LCSCs in Atlanta, Georgia, Birmingham, Alabama and Fleming Island, Florida; Local Interconnection Service Center (LISC), Major Account Center (MAC), and the Mid-Market and Small Business Centers. The latter three are retail centers. KCI observed POP Functional Evaluation (TVV1) and POP Volume Performance (TVV2) production testing activities in the wholesale centers.

This test was very comprehensive in nature and included thirteen evaluation criteria covering activities such as the receipt, logging, tracking, and entering of orders, along with the sending of responses. Other criteria addressed internal reports, escalation procedures, capacity management plans, performance measurements, and related training. KCI also evaluated both internal and ALEC-facing documentation related to manual order processing. All thirteen of the evaluation criteria were satisfied.

Finally, this test included a retail parity component. KCI compared wholesale ordering practices with those in use in BellSouth's retail operation. KCI's parity analysis found that the processes and systems used for handling manual orders in BellSouth's retail and wholesale centers are similar. In fact, BellSouth's wholesale centers have formalized and documented procedures that do not exist on the retail side.

(PPR8) POP Work Center Support Evaluation

The Pre-order, Order and Provisioning Work Center Support Evaluation analyzed the effectiveness of those BellSouth groups that handle questions related to BellSouth's OSS. Those groups are: the LCSC, CRSG, LISC and CSMs. The objective of this evaluation was to determine how well and how quickly these groups responded to questions and problems related to pre-ordering and ordering activities. KCI conducted this test using the same methodology as described in PPR7 above.

There were fourteen evaluation criteria associated with this test. They covered areas such as the existence of internal and ALEC-facing documentation, the issue resolution process, call management guidelines, escalation policies, capacity management plans, and the overall ease with which the ALEC can interact with a particular center. There

was particular attention paid to BellSouth's ability to manage projected growth in ALEC order activity and related work center support. Additionally, KCI used its pseudo-ALEC experiences from the POP Functional Evaluation (TVV1) and POP Volume Performance (TVV2) transaction tests to determine if the BellSouth work centers followed the documented processes. KCI found that BellSouth satisfied all fourteen of the evaluation criteria.

RPM Domain

Repair, Maintenance and Provisioning (RPM) – The primary objective of the M&R test was to determine whether adequate procedures, documentation and systems exist to allow an ALEC to identify, report, manage, and resolve troubles encountered with BellSouth supplied network elements. M&R consisted of eight tests, of which five were transaction-oriented and three were process-oriented. KCI evaluated 100 evaluation criteria. All 100 evaluation criteria were satisfied at the time of data collection.

The Provisioning portion of this domain evaluation was designed to review the systems, processes, and other operational elements associated with BellSouth's provisioning activities used for wholesale markets. The test examined functionality, compliance with measurement agreements, and comparable systems supporting BellSouth retail operations. Provisioning consisted of three tests, of which one was transaction-oriented and two were process-oriented. KCI evaluated 113 evaluation criteria. One hundred two evaluation criteria were satisfied. Four evaluation criteria were not satisfied. The not satisfied criteria are in the areas of directory listings, switch translation, and intercept messaging. At the issuance of the Report, seven evaluation criteria were shown as Testing in Progress. As of July 22, 2002, all seven evaluation criteria have been completed and are now satisfied.

(TVV4) Provisioning Verification and Validation

The Provisioning Verification and Validation test evaluated BellSouth's proficiencies when provisioning ALEC orders. ALEC orders were evaluated to determine whether BellSouth personnel: (1) provisioned the orders accurately as ordered via the ALEC LSR on the Firm Order Committed Due Date (FOC DD), and (2) adhered to provisioning guidelines in BellSouth's documented methods and procedures (M&P). Provisioning tests evaluated orders for Resale products, UNE-P, and UNE-Loop. LSRs were submitted to migrate, install, change or disconnect services, and were sent manually to the LCSC, or electronically through EDI, TAG, and LENS interfaces. The test also examined the effectiveness of provisioning service elements including switch translations, directory listings, coordinated and non-coordinated UNE-Loop migrations, Local Number Portability activation, High-Capacity loops, Digital Subscriber Loop, ADSL Line Sharing loops, and Completion Notices. Test methods included analyzing a variety of BellSouth system outputs in order to verify the physical provisioning of both live ALEC commercial installations and test bed accounts. The latter was accomplished with the cooperation of Florida ALECs who allowed KCI to observe and track the provisioning and installation of live orders.

After receipt and processing of the LSR, BellSouth generates a FOC notification to the ALEC that confirms the due date and time (if applicable). Once the FOC is generated, non-designed orders proceed to downstream systems and organizations, including the Address Facility Inventory Group (AFIG) for facility assignment, the Recent Change Memory Administration Group (RCMAG) for translations work, the Work Management Center (WMC) for installation orders that require dispatch of outside plant technicians,

and the Central Office-Field Work Group (CO-FWG) for orders that require central office work. Designed orders flow to the Circuit Provisioning Group (CPG) for circuit design, but otherwise follow the same provisioning process as non-designed orders. BellSouth notifies the ALECs that the LSR was provisioned via a CN. In addition to the transaction elements of this test, KCI also reviewed documentation such as the BBR-LO, BellSouth M&Ps, User Guides, and Job Aids.

The primary focus of this test was as follows:

- Accuracy as specified by the LSR
- Timeliness of order provisioning
- Timeliness and Accuracy of Notifications
- Communications and Coordination with ALEC's
- Compliance with M&Ps.

There were a total of 40 evaluation criteria for this test, 36 of the evaluation criteria received a satisfactory rating. While four criteria received a not satisfied result from KCI it should be noted that these failures occurred due to the nature of some of KCI's test scenarios, which are not representative of typical ALEC order activity. A detailed explanation of the non-typical nature is more fully depicted below:

Directory Assistance Database

KCI applied a benchmark of 95% for accuracy in provisioning. In the course of testing, BellSouth accurately provisioned listings 95.1% and 95.7% respectively, thus exceeding KCI's applied standard. During the second retest, however, BellSouth's accuracy rate fell to 85.5% and KCI issued Exception 171. This performance drop speaks to flaws in the test scenario itself, rather than to BellSouth's ability to correctly manage directory

listings. KCI chose to use a scenario in which a business customer has a multi-line hunt group. The customer wishes to disconnect the main number of the hunt group, and re-assign a secondary line as the main number. This scenario is completely unrealistic and almost never encountered by service providers dealing with actual business customers. Business customers have typically published their main telephone number on letterhead, business cards, as well as in the printed directories and other forms of advertisement. Therefore, under normal circumstances, business customers avoid changing their main telephone number at all costs. KCI, however, chose this scenario as a valid test, and submitted it numerous times on LSRs. KCI continued to utilize this scenario for this and other tests even after BellSouth advised that the scenario was rare. When this commercially insignificant test scenario is excluded, BellSouth's performance was 98.5%, well above KCI's 95% benchmark. To address the remaining 1.5%, Additionally, BellSouth will open a change request to include the community name, when appropriate, on new directory listing orders. Again.

In response to KCI's findings, and in the interests of accommodating even this rare occurrence, BellSouth has opened a change request to update the business rules for disconnecting the main telephone number of an existing multi-line account and has likewise updated methods and procedures for its service representatives. Thus, BellSouth has appropriately addressed the resolution of this commercially insignificant ordering issue.

Switch Translations

KCI applied a benchmark of 95% for accuracy in provisioning. Again, KCI repeatedly submitted the aforementioned unrealistic test scenario in numerous PONs associated

with this test. As a result, BellSouth switch translation performance rate of 90% as described in Exception 84, was also lower than it would have been if KCI had developed realistic test cases. Specifically, if the single test scenario and corresponding 10 failures were removed from the results, BellSouth's success rate for this test would be at 97%, which again exceeds the KCI benchmark of 95%.

Line Loss Reporting

KCI applied a benchmark of 95% for accuracy in provisioning. BellSouth accurately lists and publishes each item in the appropriate ALECs' Line Loss Reports. BellSouth has enhanced the Line Loss report to include not only data associated with competitive ALEC losses, but also lines lost due to ALEC-initiated disconnects. KCI announced on the July 15, 2002 ALEC Exception Status Call that they had completed their retest on the accuracy of Line Loss Reports, and concluded that BellSouth met the standard. KCI closed the exception, thus this evaluation criteria became satisfied.

(TVV 5) TAFI Functional Evaluation

TAFI is a rules-based system that provides automated trouble receipt and screening functionality to both ALEC and BellSouth retail repair center users. TAFI is designed to guide users through a series of questions and instructions to allow the user to provide the information necessary to help isolate or identify the nature of the fault being reported. This results in expediting the routing of Plain Old Telephone Service (POTS) troubles to the correct work groups for resolution. TAFI collects data from the user and various downstream systems in order to generate recommendations for resolving POTS problems. While TAFI does not perform any repair functions, it allows access to downstream systems that can repair some trouble types in real time. If TAFI cannot

identify the fault or determine the correct downstream system or work group to make the repairs, it routes the trouble to either the Maintenance Assistant Screening Pool for further analysis or directly to the WMC for dispatching of technicians to the Central Office (Dispatch In) or the customer site (Dispatch Out). Both BellSouth and ALECs use the TAFI system for handling POTS trouble reports. The version created for ALECs is identical to the BellSouth retail version for trouble processing functionality.

KCI tested TAFI functionality by utilizing a variety of scenarios designed to cover line types such as UNE-P, resale and UNE-Ports. Maintenance and repair transactions were submitted into TAFI via both dial-up and LAN-to-LAN connections in order to ensure the consistency of responses associated with both methods of access.

Along with the actual transaction tests, KCI reviewed TAFI User Guides, and also interviewed and observed BellSouth employees using TAFI in the retail Residential Repair Center (RRC) and Business Repair Center (BRC). Based upon retail parity analysis activities, KCI determined that BellSouth processes for managing wholesale TAFI transactions are in parity with those used on the retail side of the business.

There were 21 evaluation criteria considered for the M&R TAFI Functional Evaluation test, and all 21 evaluation criteria were satisfied without KCI having issued a single exception or observation. In spite of this outstanding result, KCI deemed it necessary to include a disclaimer regarding the passage of time since this test was initially performed (March 2001). The fact that other areas of the test called for KCI to engage in re-test activities should have no bearing whatsoever on the accuracy or reliability of the TAFI Functional Test results. It should be noted that this was the second time TAFI had been

tested (first in Georgia) and both times, all criteria were found to be 100% satisfied. Given these results, BellSouth, with the concurrence of the Florida Staff, concluded that it was not necessary or prudent to incur the additional cost to refresh the TAFI test results.

(TVV6) ECTA Functional Evaluation

The M&R ECTA Functional Evaluation was a comprehensive review of all of the functional elements of BellSouth's ECTA System and its conformance to documented interface specifications for M&R trouble reporting. The test was divided into two phases: Phase-1, a basic functional evaluation of the ECTA Gateway and Phase-2, an industry standard comparison. Phase-2 was conducted by comparing the functional elements of ECTA to those outlined in the American National Standards Institute (ANSI) T1.227, T1.228 and T1.262 standards for trouble administration. Although all ECTA Gateway configurations must adhere to ANSI T1M1 communication protocols, each ALEC has the ability to modify these configurations in accordance with customized Joint Implementation Agreements (JIA) between the ALEC and BellSouth. The ALEC gateway is connected to the appropriate backend OSS such as LMOS and WFA/C on the ALEC's side, and to the Incumbent Local Exchange Carrier (ILEC) gateway on the opposite side. ALECs have the ability to report and manage troubles on both non-design lines and design circuits via ECTA.

The following ECTA functions were tested, Mechanized Loop Test (MLT), Create trouble ticket; Modify trouble ticket, Add trouble information, Status inquiry, Close/Cancel trouble ticket, and Verify/Deny response.

There were 9 evaluation criteria considered for the M&R TAFI Functional Evaluation test, and all 9 evaluation criteria were satisfied without KCI having issued a single exception or observation. In spite of this outstanding result, KCI again included the disclaimer regarding the passage of time addressed in TVV5 of this document.

(TVV7) Transaction Verification and Validation - M&R TAFI Performance

Evaluation

The M&R TAFI Performance Evaluation was a transaction driven test designed to evaluate the behavior of the BellSouth trouble administration system and its interfaces under varying load conditions through volume tests. As described in the TVV5 test, TAFI is a rules-based system that provides automated trouble receipt and screening functionality to both ALEC and BellSouth retail repair center users.

The M&R TAFI Performance Evaluation was conducted in two phases. In phase I, TAFI responsiveness was measured for normal and peak loads and phase II was for stress loads. Peak load is calculated as 1.5 times the normal load, and stress is 2.5 times the normal load. March 2002 projected volumes were used for both phases. The TAFI functions targeted by this test included the entry and resolution of trouble reports, access to test capabilities, access to trouble history, and access to back-end systems that are used by the TAFI application. There were 11 evaluation criteria considered for the M&R TAFI Performance Evaluation test. All of the evaluation criteria were satisfied. In spite of this outstanding result, KCI again included the disclaimer regarding the passage of time addressed in TVV5 of this document.

(TVV8) Transaction Verification and Validation-M&R ECTA Performance

Evaluation

The M&R ECTA Performance Evaluation was a transaction driven test designed to evaluate the behavior of the BellSouth trouble administration system and its interfaces under varying load conditions through volume tests. The M&R ECTA Performance Evaluation was conducted in four phases. In Phase I and II, ECTA responsiveness was measured for normal loads. Phase III was for peak loads, and phase IV was for stress loads. Peak load is calculated as 1.5 times normal load, and stress is 2.5. August 2002 projected volumes were used for phases I and II. September 2002 projected volumes were use for phase III and IV.

There were eight evaluation criteria considered for the M&R ECTA Performance Evaluation. All 8 evaluation criteria received a satisfied result. As all evaluation criteria are satisfied, KCI considers the M&R ECTA Performance Evaluation area satisfied at the time of the Report delivery.

(TVV9) End-to-End Trouble Report Processing

The End-to-End Trouble Report Processing test was a transaction driven test designed to evaluate the timeliness and accuracy of BellSouth's performance in conducting end-to-end M&R for wholesale customers. The CWINS Center serves as the wholesale customers' single point of contact for verbally reporting troubles to BellSouth. Additionally, ALECs may initiate trouble reports through the TAFI or the ECTA interface. Trouble tickets for non-designed circuits are entered into the TAFI system, which interfaces with the Loop Maintenance Operating System (LMOS). Through LMOS, the trouble, if a dispatch is required, is either dispatched "in" to the central office (CO) or

dispatched “out” to a field technician. The dispatch is based on BellSouth diagnostic rules, within TAFI, regarding the type of fault reported, the test result, and specific information about the fault supplied by the ALEC. If TAFI is unable to determine the appropriate disposition for the reported trouble then it is sent to a screening pool queue in the CWINS Center. From the queue, a BellSouth employee performs additional fault analysis, and routes the trouble to the correct work group. POTS troubles receive a LMOS ticket number and system generated repair commitment date and time that is provided to the ALEC when the trouble is generated. The commitment interval is controlled by the BellSouth WMCs and used to prioritize the POTS maintenance activity. Troubles for designed service (Specials) and Unbundled Network Elements (UNE / SL2) - Loops are entered into the Work Force Administration/Control (WFA/C) system where they receive a trouble ticket number and an objective date and time similar to the LMOS commitment. The ALEC reporting the trouble is supplied the trouble ticket number and objective date and time once the report is generated. The interval for Specials is two, four or eight hours based on the service type while most POTS appointments are for a 24-hour interval. While LMOS reports are prioritized based on the commitment date and time, Specials are worked by service type on a first in, first out basis. Once entered, the Specials trouble will be tested and diagnosed by the CWINS Center employee and with the ALECs' concurrence the CWINS Center performs a hand-off to the central office or field technicians using the Work Force Administration/Dispatch In (WFA/DI) or Work Force Administration/Dispatch Out (WFA/DO) system. Once troubles are routed to a repair group, they are under the control of the WMC. The WMC will ensure that the troubles are forwarded to central office or field technicians and will monitor the troubles until the technicians make the repairs and the reports are closed.

For this test, BellSouth provisioned a test bed of circuits, specified by KCI, which are representative of those provisioned by BellSouth for its wholesale customers. The test bed was designed to let KCI introduce all categories of commonly reported faults. KCI inserted faults on the circuits and then reported troubles caused by these faults either using the TAFI or ECTA interface or the CWINS Center toll free number. KCI tracked BellSouth's response to reported troubles and gathered data for analysis. Specifically, data was collected relating to the timeliness of repair and the accuracy in diagnosing and resolving troubles. Once BellSouth closed out a trouble ticket, KCI printed a trouble history from TAFI or ECTA and checked the circuits to confirm that the repairs were made. In addition to inserting its own trouble tickets, KCI worked with ALECs to further evaluate BellSouth's response to actual commercial troubles. KCI conducted observations at ALEC repair call centers as actual troubles reported by ALECs to the BellSouth CWINS Center by phone and via TAFI or ECTA. A description of the trouble, the BellSouth provided commitment / appointment and the closeout times were recorded and reviewed for timeliness and whether troubles were successfully identified and repaired. Information on the retail metrics used for comparison was gathered from the BellSouth Retail SQM results for the months of December 2000, January 2001 and February 2001. Additionally, BellSouth provided detailed trouble histories on all of the trouble tickets created for this test. KCI conducted these transactions during the months of December through February 2001.

There were a total of 15 evaluation criteria for this test. All 15 were satisfied. KCI did not issue any exceptions or significant findings for this test. In spite of this outstanding

result, KCI again included the disclaimer regarding the passage of time addressed in TVV5 of this document.

(PPR6) Collocation and Network Design Verification and Validation Review

The Collocation and Network Design Verification and Validation Review evaluated BellSouth processes, procedures, supporting systems, and tools for establishing and maintaining ALECs' ability to access UNEs. This test also evaluated BellSouth's trunk forecasting methodology, which includes the treatment of proprietary information.

Collocation permits an ALEC to offer UNE services to their customers, as well as allowing connection of these customers to the Public Switched Telephone Network (PSTN) through Interoffice Facilities (IOF). The Network Design process allows an ALEC to establish a presence in a BellSouth switch when an ALEC requires dial tone from a BellSouth switch port.

The evaluation methods performed for this test relied on the analysis of information obtained through interviews with and documentation provided by BellSouth personnel supporting collocation and network design processes. Additionally, discussions were held with members of the ALEC community to understand their experiences with collocation and/or network design processes. KCI determined that BellSouth adheres to structured, documented methodologies to support the implementation of collocation and network design projects.

There were 23 evaluation criteria considered for the Collocation and Network Design Verification and Validation Review. The test targeted BellSouth's collocation and

network design planning processes, which included reviews of the following processes: planning; project management; resources; testing and implementation; forecast development; forecast security; forecast usage; capacity management process; and originating line number screening (OLNS). All 23 evaluation criteria received a satisfied result. KCI considers the Collocation and Network Design Verification and Validation Review test area satisfied.

(PPR9) Provisioning Process Evaluation

The Provisioning Process Evaluation is a parity and evaluative review of BellSouth's interfaces, systems, and processes which when combined, lead to the provisioning and turn-up of ALEC orders. The following BellSouth product types were considered in this review: Resale Services, UNEs, and Special Services, which included Asymmetrical Digital Subscriber Line (ADSL). KCI followed service orders from point of entry into the BellSouth Service Order Communication System (SOCS), through downstream systems, interfaces, and work groups as they moved toward eventual service activation. This comprehensive test evaluated numerous BellSouth work groups such as the LCSC, The Address Facility Inventory Group (AFIG), the Circuit Provisioning Group, the Complex Translations Group, and the Work Management Centers. The Provisioning Process Evaluation also included a review of BellSouth's capacity management practices as applied within the various work groups.

The objective of this test was to evaluate the existence of parity between the provisioning environment supporting wholesale orders and the provisioning environment supporting retail orders. In order to make this determination, KCI analyzed the performance of BellSouth's systems and processes against fifty evaluation criteria.

These criteria covered every aspect of the provisioning process, including the treatment of orders within systems and interfaces, the prioritization of work in the centers, center staffing, hours of operation, escalation procedures, and the sufficient documentation of methods and procedures. KCI conducted this evaluation by way of interviews, center visits, and documentation review. At all times, KCI's primary focus was on whether or not BellSouth's systems, processes, and employee functions differentiated in any way between wholesale and retail orders.

BellSouth satisfied all 50 evaluation criteria during this very lengthy and detailed review. Several centers were visited multiple times over a two-year period. KCI found that there is indeed parity between BellSouth's wholesale and retail practices as related to service order provisioning. In addition, BellSouth's provisioning centers have sufficient and documented plans in place to manage wholesale work flow demand. KCI considers the Process Evaluation (PPR-9) area completely satisfied.

(PPR14) End-to-End M&R Process Evaluation

The End-to-End M&R Process Evaluation assessed the functional equivalence of BellSouth's M&R processing for wholesale and retail trouble reports. The end-to-end M&R process includes all activities from the moment a trouble repair call is received by the repair receipt bureau or a trouble ticket is captured in BellSouth's systems until the same trouble is closed and the customer is notified of the resolution. Additionally, this test reviewed wholesale and retail process flows and related methods and procedures adhered to by the various BellSouth M&R work centers involved in the end-to-end M&R process. These activities were performed to assess whether there are substantive

differences between BellSouth retail and wholesale M&R processes and to identify any differences between the processes practiced in the related work centers.

ALECs contact the BellSouth CWINS Center with M&R concerns. The CWINS Center serves as the single point of contact for ALECs verbally reporting troubles. Alternately, ALECs may initiate trouble reports electronically through the TAFI or the ECTA gateway. Trouble tickets are created in different systems depending on whether they are non-designed or designed service type troubles as described in previous sections.

KCI reported that the retail business process flow is consistent with the wholesale process flow to escalate and expedite trouble tickets, and to coordinate vendor meets. The retail closure reporting procedure differs slightly from the wholesale procedure. A BellSouth technician notifies the customer directly for retail ticket closure confirmation after completing the closeout. The BellSouth technician notifies the ALEC for wholesale ticket closure confirmation and the ALEC then notifies its customer or end user.

KCI evaluated the following end-to-end M&R sub-process areas: trouble reporting and handling, trouble ticket coding, trouble ticket prioritization, dispute resolution, documentation, performance measurement and capacity management. When KCI identified differences between BellSouth's wholesale and retail work centers, KCI found that the differences were attributable to variations in customers and products served at the respective centers. KCI determined that BellSouth's wholesale and retail end-to-end M&R sub-processes are in parity.

There were nine evaluation criteria considered for the End-to-End M&R Process Evaluation. All 9 evaluation criteria received a satisfied result.

Since all evaluation criteria are satisfied, KCI considers the End-to-End M&R Process Evaluation satisfactory.

(PPR15) M&R Work Center Support Evaluation

The M&R Work Center Support Evaluation was an operational analysis of the M&R work center processes developed by BellSouth. These processes and procedures provide support to ALECs with questions, problems, and issues related to wholesale trouble reporting and repair operations. M&R work center processes include creating trouble tickets, managing and monitoring open trouble tickets, resolving troubles, closing trouble tickets, and providing trouble ticket status information. Basic functionality, performance and escalation procedures were evaluated. Additionally, KCI interviewed nine ALECs as part of this evaluation.

BellSouth provides ALECs with M&R support through the CWINS Center. CWINS personnel are responsible for taking trouble reports, performing trouble isolation and testing analysis, and, if necessary, routing to the appropriate departments for resolution. The CWINS Center serves as the primary point of contact for ALEC reported troubles and is accessible to ALECs 24 hours a day, seven days a week, 365 days a year. The CWINS Center is responsible for handling troubles for both non-designed and designed services.

As described in previous sections, ALECs report trouble in one of three ways, TAFI, ECTA, or calling the CWINS Center directly.

There were eighteen evaluation criteria considered for the M&R Work Center Support Evaluation test. All eighteen evaluation criteria received a satisfied result. Since all evaluation criteria are satisfied, KCI considers the M&R Work Center Support Evaluation satisfactory at the time of Report delivery.

(PPR16) Network Surveillance Support Evaluation

The Network Surveillance Support Evaluation was an analysis of the processes, procedures and responsibilities associated with BellSouth's M&R network surveillance and network outages related to wholesale operations. This test evaluated the functionality of the Network Reliability Center (NRC) and the Network Management Center (NMC) in providing network surveillance and network notification. KCI examined network surveillance processes for both retail and wholesale operations to assess completeness. The evaluation focused on the operations within the NRC that is responsible for overseeing, monitoring and maintaining BellSouth's network.

The NRC is specifically responsible for maintaining and monitoring the IOF, switching networks, and digital loop carriers. The NRC also provides quick-response solutions to major network outages or failures in the BellSouth operating region. The NMC is responsible for monitoring BellSouth's network traffic and interoffice voice traffic by rerouting traffic as well as applying controls/protective controls to the network to maximize call completion.

The test targets and measures evaluated BellSouth's network surveillance and outage notification processes, which also included IOF surveillance; Advanced Intelligent (AIN) interconnect surveillance, Signaling System (SS7) interconnect surveillance; process documentation; and notification procedures. The data collection performed for this test included interviews and observations of BellSouth's personnel with direct responsibility of the targeted processes and responsibilities.

These test targets and measures were assessed with nine evaluation criteria, and all nine received a satisfied result for the Network Surveillance Support Evaluation. Since all evaluation criteria are satisfied, KCI considered the network surveillance support evaluation as satisfactory.

Billing Domain

The Billing domain included an analysis of overall billing procedures as well as an exhaustive review of actual bills generated by three billing systems: CRIS, CABS, and Integrated Billing Solution (IBS/Tapestry). IBS/Tapestry is an upgraded UNE billing platform that BellSouth implemented while KCI's billing tests were still underway. Therefore, KCI did not have the opportunity to complete all testing of Tapestry/IBS prior to the issuance of the Report.

The Billing domain consisted of five tests. There were two transaction validation tests, TVV-10 and TVV-11, which evaluated Billing Functional Usage and Functional Carrier Bills respectively. The Billing Functional Usage test focused on data captured in the Daily Usage File (DUF) records. DUF records contain messages that can be used by ALECs to bill their end users. The Functional Carrier Bill test, on the other hand,

analyzed BellSouth's ability to generate timely and accurate bills. The other three tests were process and procedures evaluations known as PPR10, 12, and 13. The PPR 10 test evaluated functions and performance of BellSouth's Billing Work Center and Help Desk. PPR12 looked at the processes used in creating and distributing the aforementioned DUF files, while PPR13 evaluated the activities associated with the production and distribution of ALEC bills.

KCI used a number of methods to gather and analyze the data associated with the billing review. They held interviews, reviewed internal and ALEC-facing documentation, conducted observations, and of course obtained and scrutinized actual bills and DUF records. When appropriate, KCI also conducted parity analyses by performing many of these same activities within BellSouth retail operation centers. This comprehensive approach to the billing test allowed KCI to consider a total of eighty-seven evaluation criteria. Of those, eighty-five or 98% are satisfied, while testing remains in progress for the remaining two. It should be noted that the two outstanding criteria are both related to the matter of UNE rate accuracy and BellSouth expects them to be rated as satisfactory and when the July 30, 2992 Report is issued. The specific results for these two test points will be discussed in the following sections.

(TVV10) Billing Functional Usage Evaluation

The objective of the Billing Functional Usage Evaluation was to analyze the completeness, accuracy, and timeliness associated with BellSouth's delivery of the DUF. KCI's review addressed the delivery of multiple record types including access records, rated records, unrated records, and credit records. To accomplish the review, KCI acted as multiple non-facilities-based ALECs providing Resale and UNE-P services

to business and residential customers. During the test, KCI migrated a large number of accounts from different ALEC provider types (e.g. Resale to UNE, Retail to UNE, Resale to Resale, UNE to Resale, etc.) KCI then made test calls to determine whether or not BellSouth effectively captured these calls and delivered them completely and accurately to the KCI ALECs.

There were six evaluation criteria included in the Billing Functional Usage Evaluation Test. KCI found that BellSouth accurately delivered DUF records to the correct ALEC owner with a success rate of over 96%. In addition, all records were delivered as expected, with no incidences of unexpected DUF records having been delivered in error. KCI further determined that 100% of the DUF record packs were complete with 100% of the fields accurately populated. KCI established a testing benchmark calling for DUF records to be delivered within six calendar days. KCI found that over 97% of the DUF records were delivered to the ALEC within six-calendar days. To recap, BellSouth met or exceeded all of KCI's expected results and satisfied 100% of the evaluation criteria for this particular test.

(TVV11) Functional Carrier Bill Evaluation

The Functional Carrier Bill Evaluation was a transaction-based test of BellSouth's ability to produce and release timely and accurate bills. In performing this test, KCI again acted as multiple non-facilities-based ALECs. The test included Resale, UNE, and UNE-P accounts. All types of billing charges were examined including usage charges, monthly recurring charges and non-recurring charges. These charges were generated as a result of service order activity covering scenarios such as adding, disconnecting, moving, and migrating lines. KCI also reviewed the three types of bill formats that are

offered to the ALECs: CDROM, Billing Output Specification Bill Data Tape (BOS BDT), and paper bill.

There were 29 evaluation criteria in the Functional Carrier Bill Evaluation test and KCI has completed testing on twenty-seven of them. BellSouth actually exceeded KCI's 95% benchmark by achieving 100% accuracy for eleven of them. The remaining two criteria were testing in progress. Details are as follows:

TVV11-2-2 evaluates if recurring rates on UNE invoices are consistent with applicable tariffs and/or contract rates. In current testing related to the IBS/Tapestry UNE upgrade, 100% of the 115 monthly recurring charges reviewed to date were consistent with applicable tariffs and/or contract rates. This testing is still in progress and will be completed pending receipt of two commercial bills.

TVV11-2-14 evaluates if pro-rated calculations on UNE invoices are consistent with applicable tariffs and/or contract rates. In current testing related to the IBS/Tapestry UNE upgrade, 100% of the 105 pro-rated charges reviewed to date were consistent with applicable tariffs and/or contract rates. This testing is still in progress and will be completed pending receipt of two commercial bills

BellSouth expects the remaining two criteria to be satisfied when the second version of the Final Report comes out in on July 30, 2002.

(PPR10) Billing Work Center/Help Desk Support Evaluation

The Billing Work Center/Help Desk (B&CC) is the BellSouth organization responsible for handling ALEC billing disputes, issues, and other billing inquiries. The Billing Work Center/Help Desk Support Evaluation was a comprehensive analysis of the systems, personnel, organizational structure, call handling procedures, and workforce management plan associated with the B&CC. The test was conducted largely by way of interview, observation, and documentation review. Of seventeen evaluation criteria, all were satisfied.

For purposes of establishing parity, KCI also conducted a similar review of like processes as handled by retail billing groups. KCI's summary concerning the parity test stated, "Although the retail help desk procedures are not the same as those in the wholesale help desk/work center, KCI found functional similarities in the systems, personnel, management structure, help desk call processing, and workforce performance and capacity management areas".

(PPR12) Daily Usage Production and Distribution – Process Evaluation

The Daily Usage Production and Distribution – Process Evaluation was a detailed review of the procedures and documentation used by BellSouth in creating and transmitting DUF. As mentioned earlier, DUF records contain messages that enable ALECs to bill their end users. The objective of this test was to determine the accuracy, completeness, and timeliness of the DUF distribution process. This evaluation included call detail for both calls originating from BellSouth switches and those that were alternately billed calls (e.g. collect, third number billed and calling card calls). There were eleven evaluation criteria associated with this test, and they addressed process definition and documentation, DUF balancing and reconciliation, data transmission and

tape delivery to the ALEC, backup of DUF files, retrieval and transmission of these backup files, and capacity management of the systems utilized. BellSouth satisfied all eleven evaluation criteria.

The PPR12 test also included a parity component. In an effort to establish parity, KCI examined the retail unit's Centralized Message Distribution System (CDMS). This system and its related processes and personnel were observed by KCI. Following the parity review, KCI concluded that DUF production and distribution is in parity with BellSouth retail practices in all areas.

(PPR13) Bill Production and Distribution Process Evaluation

The Bill Production and Distribution Process Evaluation was an operational analysis of the processes and procedures involved in producing and distributing wholesale bills. The objective of the test was to ascertain whether or not these processes were sufficient to ensure that charges for products and services were billed accurately and delivered in a timely manner. There were twenty-four evaluation criteria considered for this test. They included a review of service order processing; message processing; usage rating, payment and adjustment processing; bill calculation, bill balancing and verification; bill distribution; and capacity management. BellSouth successfully satisfied all twenty-four evaluation criteria.

KCI also evaluated these processes for parity with those used in the production and distribution of retail bills. KCI found that there were no differences in performance in the production of retail and wholesale bills. They concluded that the two processes are in parity.

In conclusion, although testing activities for two evaluation criteria are still in progress, KCI's findings to date strongly indicate the overall success of the Billing Test. BellSouth has thus far satisfied eighty-five out of eighty seven evaluation criteria, which translates into a 98% success rate. As stated in the preceding TVV11 summary, BellSouth is confident that the two outstanding evaluation criteria will be reported as satisfied in the July 30, 2002 report.

ALEC WORKSHOP QUESTIONS AND ANSWERS

On July 12, 2002 the FPSC held an ALEC Workshop to review KCI's OSS Draft Final Report. All ALECs were allowed to submit questions prior to the workshop for discussion. KCI answered questions raised by the ALECs during the workshop. BellSouth would like to address some of the questions and answers.

In the past, ALECs have complained about their involvement and participation in the OSS Test development and testing process. In Ms. Harvey's opening comments she addresses the history of ALEC participation over the past two and one half years, and concludes on page 6 beginning at line 5 of the ALEC Workshop transcript that, "All of these activities culminate in the fact that this test process has been an extremely open one and, as a result, the test report before us today contains no surprises to any of us".

BellSouth expects that the ALEC community will still complain that the test was not all inclusive of every imaginable scenario. Mr. Wirsching addresses this issue on page 15 beginning on line 17 of the ALEC Workshop transcript when he states, "There are literally hundreds of thousands of permutations and combinations of possible test

scenarios that would be available in Florida. Obviously that's not feasible for any one entity in a reasonable amount of time to interact. We, in joint development with Staff and interested parties, developed a list of available test cases and, with Staff concurrence, conducted the test that way."

BellSouth expects the ALEC community to also disagree with KCI's application of professional judgment in areas where KCI concluded that BellSouth satisfied test points. KCI has applied professional judgment on all tests across the country where they have had involvement. As Mr. Wirsching explains beginning on page 64 line 18 in the ALEC Workshop transcript, in response to an MCI WorldCom question, "We established that in our professional judgment". Ms. Lichtenberg replied, "I know that you establish benchmarks when there isn't a benchmark established either by the Commission or internally by BellSouth. I was surprised to see that BellSouth had no internal benchmark. Did I misread that?" Mr. Weeks responded, "We've never used BellSouth internal benchmarks as our standards. We use SQMs when there are relevant SQMs and we will apply those. In the absence of that, then we apply our professional judgment and use the standard that we establish." They will also criticize KCI's use of statistics as described in Appendix A of the Florida OSS Draft Final Report. BellSouth would simply reply that KCI has applied the same statistical methodology for several OSS tests, many of which have been reviewed and met with approval as evidenced by state and FCC 271 Application approvals.

The ALEC Community inquired several times during the workshop as to which evaluation criteria had more impact than others. Mr. Weeks with KCI explains during discussions with AT&T on page 70 beginning on line 2 of the ALEC Workshop

Transcript, "One has to look at the underlying report and the evaluation criteria and what was satisfied and what was not satisfied and what kind of problems and issues were highlighted in our comments section to really understand and grasp the significance of a particular criterion". In other words, each test point and corresponding test point comments should be viewed as it relates to ALECs submitting actual transactions to BellSouth.

Finally, we expect the ALEC community to emphasize the Not Satisfied evaluation criteria, which equate to 14 out of 484, only 3% of the test. However, as Ms Harvey explains on page 6 beginning at line 9 of the ALEC Workshop Transcript "The objective of this test was to determine if BellSouth is providing nondiscriminatory access to its OSS systems and the documentation. The FCC has repeatedly stated that the 271 checklist does not require perfection". This report achieves her stated objective. The results are not perfect, but they do substantiate that BellSouth provides non-discriminatory access to ALECs.

Covad Questions

Covad's first questions concern BellSouth's manual processes in the POP Functional Evaluation. Covad stated that more than one third of all Exceptions logged during the evaluation process were associated with the POP test domain. The POP test domain contained all functional and volume transaction tests as well as the flow through test and is considered the heart of the OSS test. It is reasonable that a larger number of the exceptions would be opened here. Covad also mentions that a large percentage of those exceptions were related to manual processes and lists 8 exceptions (Exceptions 70, 72, 90, 91, 92, 93, 116 and 117) that were specific to Manual Order Processing. Of the 8 listed, KCI withdrew 3 (Exceptions 91, 92 and 93) because they were invalid. The

remaining 5 exceptions cited by Covad have been successfully resolved and received a satisfied rating in the Florida OSS Draft Final Report on 6/21/02.

Covad's next set of questions concern KCI's measurements of BellSouth's performance for Line Shared Loops. Covad asked if KCI evaluated a defect in which BellSouth does not return a pseudo circuit number with an FOC for a Line Shared Loop order. KCI stated that they were aware of the defect but it was not significant enough to cause a not satisfied result, in fact Mr. Wirsching on page 26 line 7 of the ALEC Workshop Transcript said " We were aware of the problem, we were aware of the defect noticed. When we sampled the firm order confirmations that we received in the BellSouth area, the problem was identified during that sampling but it was not significant enough to cause a not satisfied result". KCI further explained that they were able to validate their bills using CSOTS, which is the defined workaround for this issue. Mr. Wirsching explained to Covad on page 27 line 9 of the ALEC Workshop Transcript "In our experience it was not a significant impact". Mr. Wirsching's comment clearly categorizes the significance of the issue raised by Covad.

Finally, Covad asked if KCI measured BellSouth's performance with regard to Unbundled Copper Loop – Non-designed. KCI replied that testing of Unbundled Copper Loop – Non-Designed was not in the scope of the OSS test; therefore they could not draw any conclusions on this product without testing. The reason this specific product was not tested is because no ALEC requested the addition of it to the Master Test Plan, which was developed through input from all parties.

Mpower Questions

Mpower inquired if TAG API provides circuit ID's on FOCs for DS-0 loop orders. Currently, there is an issue with the LNP Gateway not returning the Circuit ID's on FOCs. BellSouth does have a workaround in place until this issue is corrected. ALECs can get this information by calling the LCSC or through CSOTS. However, there is no impact on the provisioning process as alleged by Mpower. This is a simple return of information in a field on an FOC; it has no impact on the provisioning of the DS-O Loop orders.

MCI WorldCom Questions

MCI Worldcom (MCI) inquired about the LSRR and whether it was a new system. Local Service Request Router (LSRR) is a component that routes the LSR to the LNP Gateway, LESOG or SGG where appropriate. It is not a new system as alleged by MCI WorldCom.

MCI inquired if KCI audited the process for ordering Originating Line Number Screening (OLNS). KCI responded that they had successfully tested OLNS. Beginning on page 54 line 24 of the ALEC Workshop Transcript Mr. Wirsching states, "Our test method on this was actually to establish OLNS in a central office and make test calls on KCI test circuits". Ms. Lichtenberg responded "And they all worked and everything was fine?" Mr. Wirsching replied " Yes, ma'am."

On page 59 beginning on line 8 of the ALEC Workshop Transcript MCI WorldCom inquired "[h]ow do we judge the impact of the open Exceptions and the impact of the failed test points on consumers, and therefore, on the ability of ALECs to compete?" Mr.

Weeks responded that, "Well I think the answer to that is it depends on the nature of the problem and the way the problem visited itself on particular customers or particular ALECs." He went on to say beginning on page 60 line 2 of the ALEC Workshop Transcript, "So one cannot generalize and should not generalize about counts and numbers and things. One needs to take the specifics of what competition is like here in Florida, what the consumers need in order to have meaningful competition, what the ALECs need to operate, and I think it's really the company and the advocates that need to come to the table and make that case. We're not in sort of a position to do that for parties".

AT&T Questions

AT&T asked for clarification on the types of information that were provided to KCI by BellSouth and third parties that were relied upon for the test without independent verification. KCI explained on page 67 line 22 of the ALEC Workshop Transcript "I think a great example both from BellSouth and the ALECs are volume test statistics, historical and forecast. For example, BellSouth provided us historical levels of transactions both by product type over periods of months. We took that information at face value. In addition, ALECs provided us forecasts in which they forecast their projected order volumes. Again, we did not verify those forecasts". With regard to BellSouth system and documentation changes, AT&T inquired about instances in which KCI did not verify that the changes had been made. KCI explained that documentation changes were reviewed and in instances where system changes occurred KCI retested for the correct behavior.

AT&T and KCI got into a debate around public versus BellSouth internal proprietary documents. AT&T inquired which documents listed in the RMI Domain report were publicly available to ALECs. The majority of the documents listed are BellSouth proprietary documents, however, BellSouth provides a full complement of ALEC instructions, Business Rules, Guides and product information on its Interconnection Services website. An example of this can be found at <http://www.interconnection.bellsouth.com/main/clec.html>. KCI extensively tested BellSouth external and internal documentation as described in numerous PPR tests in the report. AT&T and Mr. Wirsching got into a series of questions and answers on this topic as can be seen beginning on page 73 line 24. Mr. Bradbury asked, "How then do ALECs know that the document exists, that the document is needed, that their actions are complying with the document or that BellSouth's actions are complying with the document?" Mr. Wirsching responded "BellSouth provides ALEC facing documentation that provides ALECs with their roles and responsibilities." Ms. Azorsky asked on line 11, "Did KCI evaluate whether the information in all of these BellSouth proprietary documents was available in an ALEC facing document?" Mr. Wirsching responded, "KCI did evaluate that the ALEC facing documents contained all the required information for ALECs to interface with BellSouth". Mr. Weeks went on to explain the differences in internal and external documentation, and how each company (BellSouth and ALECs) has both. He stated, beginning on page 75 line 4 that "In fact, we wouldn't expect it to be the case that those specific internal M&Ps were visible to the ALECs and that there was a one-to-one mapping between those and documents that are visible to the ALECs any more than we would expect the ALEC's internal documentation of how they operate their business to be tracked and mapped into the roles and responsibility documents that are part of the ALEC interface for the company. So its expected that each company

will have its own way of doing what it does in own internal processes and, when the two need to come together in some way, that there is a publicly available document and that that document is well formed and it meets its intended purpose. And so the way that we organize our testing reflects that philosophy."

The CAVE test environment has been a point of ALEC comment in several of BellSouth's state and federal 271 processes. Mr. Bradbury beginning on page 98 line 25 of the ALEC Workshop Transcript asks, "Did the KCI ALEC test any interfaces in the CAVE test environment?" Mr. Wirsching responded, "No, we did not conduct any transactions into the CAVE environment, but we did observe other entities submitting transactions in the CAVE environment." Mr. Bradbury asked in response, "In those observations did you note any deficiencies in the CAVE environment?" Mr. Wirsching responded, "No we did not". KCI has validated that they did not note any deficiencies in the CAVE environment.

AT&T went on to inquire about the Capability Maturity Model (CMM). Beginning on page 99 line 9 of the ALEC Workshop Transcript, KCI responded that they did not complete a CMM assessment. BellSouth would like to provide additional information on CMM and the two primary vendors that support BellSouth's OSS, Telcordia and Accenture. The CMM is organized into five maturity levels:

- 1) Initial.** The software process is characterized as ad hoc, and occasionally even chaotic. Few processes are defined, and success depends on individual effort and heroics.

2) Repeatable. Basic project management processes are established to track cost, schedule, and functionality. The necessary process discipline is in place to repeat earlier successes on projects with similar applications.

3) Defined. The software process for both management and engineering activities is documented, standardized, and integrated into a standard software process for the organization. All projects use an approved, tailored version of the organization's standard software process for developing and maintaining software.

4) Managed. Detailed measures of the software process and product quality are collected. Both the software process and products are quantitatively understood and controlled.

5) Optimizing. Continuous process improvement is enabled by quantitative feedback from the process and from piloting innovative ideas and technologies.

This information can be found on the Carnegie Mellon Software Engineering Institute (SEI) website <http://www.sei.cmu.edu/cmm/cmm.sum.html>. BellSouth's two primary vendors, Telcordia and Accenture have achieved CMM Maturity levels. Telcordia, as stated on their company website <http://www.telcordia.com/aboutus/quality/index.html>, was assessed at Level 5 in May 1999 and Accenture was assessed at Level 3 in May 2002. It is important to note that only 20% of all CMM assessed software development organizations have attained CMM Level 3 or higher rating.

During the discussions of the retail and wholesale parity portions of the reports contained in PPR7, AT&T inquired about the type of analysis KCI performed to make their parity assessment. Mr. Weeks best summarizes discussions on parity topics and

how KCI tested them on page 105 line 5 of the ALEC Workshop Transcript, “Yes, I think we were looking for parallel structure in the definition and description and design of the process and the function as opposed to trying to monitor the performance actually delivered onto the wholesale community or delivered onto the retail community.” He further clarified KCI’s parity testing methodology beginning on page 107 line 5 of the ALEC Workshop Transcript, “We verified that when it was a parity comparison between wholesale and retail that there was parallel structure between the two in terms of how they did their work, how they measured the performance of their work, but we did not – it was oriented towards understanding if the processes as they were defined were at parity, not the processes as they were operated at parity.”

AT&T also questioned training, compensation and length of service for BellSouth personnel in several ordering and provisioning centers. KCI replied they did not think length of service or compensation was a key component. However, they did test training. Ms. Azorsky with AT&T and Mr. Weeks with KCI got into a series of questions that extended to “Did the personnel dress the same?” Mr. Weeks summarized this line of questioning on page 158, line 14 of the ALEC Workshop Transcript when he replied, “I think a best answer to your question is that while we looked at each set of M&Ps and we observed each set of M&Ps in operation through our observations, we didn’t explicitly try to compare and contrast each individual step in its execution between wholesale and retail at the level I think you are implying”.

AT&T asked questions regarding the standards applied during the TVV2 – POP Volume Test. AT&T inquired whether KCI created a different standard than the Florida Commission standard parity plus two seconds. KCI explained that they applied their

own standard using their professional judgment specifically that a 10 second preorder response in these circumstances would be sufficient. This professional judgment was reached by looking at historical data and the information provided in CLEC survey forecasts to determine how many preordering transactions an ALEC performed for one order. KCI explained the differences in feature and function testing in TVV1 versus volume testing in TVV2. KCI used professional judgment where they applied standards for volume tests. The rationale is best explained by Mr. Weeks beginning on page 137 line 7 of the ALEC Workshop Transcript. "There are two parts to the answer to that question. Number one is a stress test isn't designed to be passed or failed, it is diagnostic information". He goes on to say in line 17, "The second thing that is true is that in looking at retail data today using today's volumes and comparing that with stress volumes in the wholesale operation during the stress test, which is volumes much into the future, you are comparing apples and oranges. We didn't run a stress test on the retail test in parallel or in retail systems in parallel with the stress test on the wholesale systems, so we can't really say what the retail systems would have performed had they been under their retail stress levels, so you are comparing apples and oranges there."

AT&T inquired about the FID USOC Evaluation Logic (FUEL) and Service Order Language Analysis Routine (SOLAR) systems. KCI requested information on these systems after the ALEC Workshop to validate that this new information would not change their assessment. SOLAR performs two primary functions: (1) reverse translation of information on a customer's CRIS account and (2) account verification. Reverse translation is the process of receiving the customer's existing account information and translating it to service request format using the grammar resident in FUEL. When the reverse translation is successful, SOLAR then verifies the account.

The purpose of account verification is to check for missing data or data inconsistencies on the account. FUEL is the system responsible for providing the knowledge base for SOLAR. Data that comprise the knowledge base are the grammar rules, permitted values, data ranges, exclusivity and data formatting rules. FUEL also validates the grammar and rules necessary for constructing service requests. This additional information was never withheld, it was quite simply never considered due to immateriality. KCI has confirmed that the new information on SOLAR and FUEL has not changed their original assessment.

In summary, the ALEC community participated in all aspects of the Florida OSS Test, including providing input to the scope of the test as well as monitoring the progress and issues that were raised during the course of testing. They were also provided the opportunity to raise questions about the final report that was published on June 21, 2002 using the ALEC Workshop forum. As previously stated, the results of this test should not be a surprise to any of the involved parties and while not perfect, clearly conclude that BellSouth provides non-discriminatory access to ALECs.

Data Validation

As part of the OSS Test, KCI is conducting an extensive audit of BellSouth's performance measurements. While the audit is not completed, KCI has not identified any systemic or meaningful issues that impact the validity of the data. The exceptions that KCI has found will be discussed in more detail below. Furthermore, there are a number of other indicia of reliability of the data in addition to the audit upon which this Commission can rely. First, and importantly, in BellSouth's Georgia/Louisiana FCC application, the FCC determined that BellSouth's data validation processes provided

reasonable assurances of data reliability and accuracy stating: "In view of the extensive third-party auditing, the internal and external data controls, the open and collaborative nature of metric workshops in Georgia and Louisiana, the availability of the raw performance data, BellSouth's readiness to engage in data reconciliations, and the oversight of the Georgia and Louisiana Commissions, we are persuaded that, as a general matter, BellSouth's performance metric data is accurate, reliable, and useful." See *BellSouth GA/LA Order* ¶ 19 (*footnote omitted*). Because performance data are produced via a regional system, the same factors that persuaded the FCC of the accuracy, reliability and usefulness of performance data in Georgia/Louisiana are present in Florida.

Just like the Georgia and Louisiana data, SQM data for Florida are verified and validated in several ways to maintain the integrity of the data and ensure that no data are lost. First, BellSouth's systems have internal quality assurance controls. Second, BellSouth has implemented manual data validation processes within and between data processes. These checks take place for both BellSouth data and CLEC data. Third, in addition to the on-going Georgia and Florida audits, BellSouth's PMAP reports will be monitored by the several state Commissions in BellSouth's region and audited annually for the next five years by an outside auditor. These review and monitoring mechanisms are even more stringent than those in place in New York, which the FCC found provided "reasonable assurance that the data will be reported in a consistent and reliable manner." *Bell Atlantic-NY Order* ¶ 442.

BellSouth's systems execute a number of validation checks to ensure the integrity of data between databases from the legacy systems to PMAP staging of raw data. As an

example, the process for transferring data between the legacy systems and the performance reporting systems includes a number of record checking routines to ensure that valid records are not being lost. In addition, raw data validation scripts are used by BellSouth to insure that the raw data made available to ALECs on the Web can be used to produce the PMAP reports posted to the Web. These validation processes occur in both PMAP version 2.6 and PMAP version 4.0.

BellSouth also performs a number of manual validation processes on the data each month to assess its accuracy and completeness. These validation processes can be divided into two categories – code validation and business validation. In the first process, the data production team analyzes and validates the computer code. This team validates the computer programming to insure the data are produced in accordance with the code. A team of data analysts conducts the second data validation process. This team performs reasonableness checks on the data. For example, they may review data for the current month compared to the previous month to see if volumes or volume changes are reasonable from a business standpoint. Another function of the data analysts is to ensure that SQM Definitions, Business Rules, and Exclusions are applied accurately to the data. Similarly, experts in the field, i.e., Network Operations, LCSC, review the performance results to validate that the results are reasonable. These validation processes occur in both PMAP version 2.6 and PMAP version 4.0.

Moreover, BellSouth provides ALECs with access to their own CLEC-specific data each month. As the Commission has recognized, this provides an additional check on the reliability of the data. SWBT – KS/OK Order, ¶ 278.

BellSouth also has a group of employees designated to respond to CLEC inquiries about BellSouth's performance data. The CLEC Interface Group serves as a primary point of contact for all CLEC questions on PMAP. The CLEC Interface Group uses CLEC inquiries as an ongoing check on the reliability of the data.

Finally, in the Georgia/Louisiana FCC application, the FCC recognized the extensive level of the KCI audits in assuring the reliability and accuracy of BellSouth's data despite the fact that the audits are not completed stating: "BellSouth's data has been subject to a series of audits overseen by the state commissions, and the previous audits have demonstrated that almost all of the data is reliable and accurate. While the current audit has generated exceptions, the record demonstrates, through BellSouth's analysis, the interim status report from KCI, and the comments by the state commissions, that the problems identified have had, for the most part, only a small impact on the data presented to us." See BellSouth GA/LA Order ¶ 19 (footnotes omitted).

In conclusion, the extensive safeguards that are in place, both internal and external, will ensure that BellSouth's performance data will remain, as the FCC found in Georgia/Louisiana, reliable.

PMAP 2.6 to PMAP 4.0 Conversion

As discussed in the KCI Report, BellSouth has been working to upgrade its data collection and reporting platform from PMAP Version 2.6 to PMAP Version 4.0 as part of a normal and sequential enhancement to BellSouth's data processing capabilities. This upgrade does not alter the measures as defined by the SQM. It simply improves the

system utilized to produce those measures. Among the key benefits associated with this incremental upgrade are increased processing scalability, improved platform reliability, increased capacity for retention of data, and streamlined and simplified code (to improve audit ability). In addition, and importantly, PMAP version 4.0 was necessary to comply with state-specific measurements orders such as North Carolina and Florida.

PMAP 4.0 Process Flow

Although the KCI audit of PMAP Version 4.0 is not completed, BellSouth's extensive testing of the Version 4.0 upgrade ensures the reliability of the data. For the Commission's information, following is a brief overview of the PMAP Version 4.0 program used to produce April 2002 performance data forward.

The first stage of processing in PMAP is referred to as the 'Acquisition Phase' in which data is sourced from the requisite legacy systems so that it can be processed according to the SQM business rules. This stage is defined from the processes used to obtain the data itself to the actual preparation and storage of the data, referred to as the 'snapshot' process.

In PMAP 2.6, the 'Acquisition' server platform is called the Interexchange Carrier Analysis and Information System ("ICAIS"). Using the Version 4.0 platform, this stage is performed by the Regulatory Ad-Hoc Data System (RADS). On both platforms, the function is the same – i.e. get the data from the source system and prepare it for processing. The main differences between ICAIS and RADS are: 1) RADS utilizes Oracle 9i Database management software, ICAIS utilized an older Informix 7 database. Informix has been bought by IBM, and is no longer a primary database technology

vendor for BellSouth. 2) RADS is housed in our EDS managed data centers, providing added redundancy and support levels whereas ICAIS is physically located in the Access Carrier Advocate Center (ACAC) operational center, which is a leased office building without the same level of power and computing support facilities as our corporate data centers and finally 3) RADS has significantly more processing power for dealing with the large datasets that PMAP receives.

The first step of the Acquisition Phase is to physically transfer the required data to the acquisition platform. This step is performed by automated control scripts that are timed to pick up the data at programmed intervals and transfer it across the network to the server's source storage area. The second step initiates a database load process in which the source data is directly transferred to a structured table format that constitutes the working representation of the source data. Depending on the source system in question, these files are loaded on an hourly, daily, weekly, or monthly schedule, and are processed as soon as they are received from the source system. The raw files are then compressed and archived along with the log files that tracked the process. In Version 4.0, an additional feature has been added to this process. This new feature adds a 'load sequence' number to the log files and places this value in the database table records. With this additional information, a particular record can be easily traced back to the source file from which it came. This change was made in the new architecture to further facilitate the ability to trace the data in a mechanized fashion. This action could be performed in PMAP 2.6, but it had to be done manually.

Because PMAP processes data on a monthly basis and BellSouth must assure that measures can be replicated, a snapshot process for the source data was developed

that effectively 'freezes' the data necessary for reporting in a given month. This process is implemented via a series of database script files that extract the source data from the database tables and create a new table consisting of one or two months (some measures require two months, such as Provisioning Troubles w/in 30 days) data. This snapshot data is then used as the basis for subsequent processing in the PMAP architecture. BellSouth refers to data in this stage of processing as 'early stage data'.

The majority of the differences between PMAP 2.6 and the Version 4.0 architecture exist in the next phase of data processing, the Business Rules processing phase. Following the generation of the snapshot data, PMAP 2.6 copies the data to an area called 'PMAP Staging' in which BellSouth applies the required business rules to the data. Version 4.0 directly accesses the snapshot data, applies the required business rules and moves it to the 'warehouse' schema. This makes the snapshot database itself in Version 4.0 the functional equivalent of PMAP 2.6 Staging.

The PMAP Business Rules are such things as Product Identification algorithms, Dispatch/Non-Dispatch algorithms, Customer Identification routines, Geographic routines, etc. In the 2.6 architecture, this rules processing was accomplished via a product called Ardent Datastage. Datastage is an 'off the shelf' product that BellSouth purchased to perform business rule processing. Datastage is a good product for many types and sizes of projects, but the sheer size and complexity of the business rule set required by the SQM documents has caused BellSouth to surpass the designed capabilities of this tool. Over time, the rule set has gotten spread out into various jobs and has become exceedingly complex to maintain and reverse-engineer. This reduces the ability of a third party to efficiently audit the data. PMAP Version 4.0 uses a more

'simplistic' approach that involved coding the business rule sets in Oracle's native PL/SQL language. PL/SQL is a superset of the standard SQL language that implements various procedural elements allowing flow control such as 'if...then' and program logic branching. It is a language that is well supported in the industry and has an abundance of professional developers available, whereas Datastage is a niche product with a limited professional developer pool. In comparison to Datastage, the PL/SQL approach is both simpler and much easier to analyze, providing benefits in the development process, audits, and maintenance.

In PMAP 2.6, from PMAP Staging, the data are transferred to the Normalized Operational Data Store ("NODS"), which puts the data into a normalized format. NODS passes the data to the Dimensional Data Store ("DDS"), which summarizes and aggregates the data. The final SQM reports are generated by queries run against the DDS data. The data from NODS are also used to generate the raw data files made available to the ALECs and utilized by BellSouth to validate the final SQM reports.

In Version 4.0, as the data is transferred through the 'pipeline', it is stored in the 'warehouse' schema, which is the functional equivalent of 'NODS'. To provide the flexibility necessary to permit production of multiple SQM versions that could be required by different states, a task that was very difficult in Version 2.6, Version 4.0 implements a technology we call a 'membership map'. This map is quite simply a way of flagging each trouble, order, or LSR with candidacy for a particular measure individually by state to allow different implementations of SQM requirements on a state-by-state basis.

As discussed with respect to Version 2.6, the nature of several SQM reports, e.g. OSS Interface Availability and Trunk Group Performance, require that the bulk of the data collection and processing requirements be executed manually, using spreadsheets and other simple database management tools. For these reports, the process owner for each manually produced SQM is responsible for collecting and formatting the legacy system source data that is loaded directly into the PMAP DDS database. In Version 4.0, this data is loaded into the warehouse schema, and then is moved to the data marts (described below), mainly so the warehouse becomes the 'single source' of all data used for reporting. The Version 4.0 SQM reports are then generated by queries run against the data marts, using the same final process step employed for PMAP results reporting.

Data for some SQMs (e.g. LNP Standalone and xDSL ordering) are calculated in Version 2.6 directly from the BARNEY system. This process has been replaced in Version 4.0, allowing all products to be reported from the same system – providing additional consistency in reporting. It is BellSouth's intent to mechanize as much of the current manual reporting process over time, as development and test resources are available for this internal work.

Once data is loaded into the 2.6 NODS structure or the Version 4.0 warehouse structure, it is then processed for presentation. Presentation mechanisms include the PMAP Web Site (<http://pmap.bellsouth.com>), Raw Data, 271 Charts, and MSS. To facilitate performance in presenting data, both PMAP Version 2.6 and Version 4.0 utilize a concept referred to as a 'data mart'. In 2.6, this mart is called DDS, in 4.0, there are separate data marts for 271 charts, SQM reports and raw data, each named according

to function. Bellsouth has made the presentation layer for data transparent to end-users, meaning that there are no changes in the formatting or view of SQM or 271 charts in the Version 4.0 environment, providing continuity of data results reporting through the architectural changes as outlined in this discussion.

In summary, the Version 4.0 architecture is an incremental upgrade to the processing infrastructure used to build and present BellSouth's performance data. There have been improvements in the scalability, flexibility, audit ability and processing power. All of this work has been achieved without changing the outputs – the same input data is used to produce the same outputs, but a different path of achieving the same goal is used in Version 4.0, a path that allows BellSouth to be more flexible in meeting the demands placed upon it for performance data in different formats. In short, BellSouth has implemented a system that will allow the metrics operation to grow with changes that are ordered, deal with ever increasing volumes of data, and do so in an efficient and quality oriented way. BellSouth is committed to not only meeting the letter of the requirements ordered, but also in enhancing these interfaces to provide an 'Industry Best' platform that allows our customers and regulators the best possible experience.

PMAP 4.0 Validation Process

Before PMAP Version 4.0 was used to generate April 2002 performance data, BellSouth subjected the software and outputs to extensive validation to ensure the results were correct. First, BellSouth conducted functional testing of the Version 4.0 software, raw data and reports. Second, BellSouth conducted an "output" validation pursuant to which it compared the output from Version 2.6, which BellSouth knew to be reliable, against the results of Version 4.0, to ensure that the results were comparable and thereby

validate the Version 4.0 results. Third, a workshop was conducted under the direction of the GPSC, during which interested parties had an opportunity to voice questions and/or concerns about the changes that were made in connection with the upgrade to Version 4.0. Finally, all of the other indicia of reliability, including the on-going annual audits, and BellSouth's provision of monthly CLEC-specific raw data, remain in place with Version 4.0.

The Version 4.0 functional testing included testing of software code, raw data validation, and reports validation. Last year, BellSouth tested the data flow from the source systems to RADS to ensure that RADS was accumulating the correct source data. To test the software, BellSouth developed test cases to validate the software code against the Georgia SQM and the Version 4.0 business requirements and detailed design documentation. To test the flow of data from RADS to the data warehouse, BellSouth developed test cases to validate the code that identifies the product, entity, and geography dimensions for LSRs in Version 4.0. BellSouth created integration test data by extracting production data and using it to trigger each of the test cases BellSouth had developed. BellSouth then processed the Version 4.0 software to load the warehouse and data marts, and executed the test cases for each functional area. The goal of the test was to define an expected outcome for each test scenario, run the test case to determine if it achieved the expected result, and, if the expected result was not achieved, log and correct the defect and rerun the test case. This process validated the Version 4.0 software code and the transfer of data from RADS.

BellSouth also conducted raw data validation in Version 4.0 by manually applying the Raw Data Users Manual ("RDUM") instructions to raw data extracted from the PMAP

4.0 warehouse to replicate sub-metric level results reports created by processing Version 4.0 software. In other words, BellSouth did precisely what ALECs have the opportunity to do each month with their CLEC-specific data, and essentially what KCI does in its PMR-5 audit. BellSouth executed mechanized raw data validation scripts (“RDVS”) against raw data extracted from the Version 4.0 data warehouse to validate data loaded into the SQM data mart. Finally, as part of the functional testing, BellSouth tested the reports to ensure correct formatting.

BellSouth next conducted comparative analysis testing of Version 2.6 and Version 4.0. The approach of this aspect of the validation process was to compare data, measurement results and reports to identify expected differences or defects in Version 4.0. To conduct the comparative analysis, BellSouth ran Georgia data for April 2002 in parallel, and populated two MSS reports, one with Version 2.6 data and one with Version 4.0 data (while BellSouth had conducted partial parallel runs of data in February and March 2002, April was the first full month of comparative data). This process allowed BellSouth to compare the outputs of the two versions and ensure that Version 4.0 was producing correct outputs. Identified defects in Version 4.0 were documented and corrected, and the appropriate software was re-run and re-tested.

The comparative testing of Version 2.6 and Version 4.0 confirmed that Version 4.0 provided substantially similar, but not identical, measurement results, as BellSouth expected. The total number of sub-metrics reflecting parity differed between Version 2.6 and Version 4.0 by only 0.20%. Specifically, the parity evaluation for April 2002 for Version 2.6 was 87.54% compared to 87.34% for Version 4.0. The fact that the outputs

of the two versions, each of which was independently coded, produced results that were so closely aligned confirmed the validity of the Version 4.0 outputs.

In addition, for April 2002, there were 849 sub-metrics with data in Georgia, only 69 of which had different parity results between Version 2.6 and Version 4.0.⁴ Many of the sub-metrics that experienced a difference in parity results involved low volume products such as PBX and Centrex where a change in one or two records can result in a different parity result. Of those parity conclusions that were different between Version 2.6 and Version 4.0, and changed from “yes” to “no,” or “no” to “yes” (rather than to a blank), 22 went from “yes” to “no,” and 21 went from “no” to “yes,” confirming that the data accurately reflected BellSouth’s overall performance to the ALECs.

An analysis of the comparative data by mode of entry further confirms the reliability of Version 4.0 data. For example, for resale sub-metrics, the parity analysis for April 2002 data in Georgia was 86.82% using Version 2.6, as compared to 86.78% under Version 4.0, a difference of only 0.04%. Similarly, UNE parity performance was 87.45% using Version 2.6, as compared to 87.28% under Version 4.0, a difference of only 0.17%. That two versions of software code, each of which was written independently based on the SQM and each of which was coded in a different software language, produced substantially similar results confirm the validity of the Version 4.0 results. BellSouth’s comparative analysis, in conjunction with the functional testing of Version 4.0, demonstrates that the Version 4.0 code is as reliable as the Version 2.6 code upon which this Commission relied in the Georgia/Louisiana application.

⁴ These figures exclude “FOC and Reject Response Completeness (Multiple Responses)” and “Parity by Design” sub-metrics, as well as diagnostics.

There are slight differences in the outputs of the Version 2.6 and Version 4.0 code, which BellSouth expected. There are several reasons for these expected differences. First, in implementing Version 4.0 code, BellSouth corrected known errors in the PMAP 2.6 code, which were documented in BellSouth's GALA application. Second, BellSouth implemented some enhancements with the Version 4.0 code, including improved accuracy in product and geographic mapping that caused shifts in data. Finally, in conjunction with the validation process, BellSouth uncovered several errors in the Version 2.6 code about which BellSouth did not previously know (which are discussed in greater detail below). Each of these changes was memorialized in the notifications BellSouth filed with the GPSC and posted to its PMAP website on May 23, 2002, and June 4, 2002, to provide ALECs and regulators notice of the changes BellSouth planned to make to its performance data.

In the category of correction of known errors, BellSouth corrected four issues with the Version 2.6 data that it discussed in its Georgia/Louisiana application. First, BellSouth made an adjustment for Reject Interval and FOC Timeliness for LNP LSRs submitted via the EDI gateway for which BellSouth was unable to utilize start and stop timestamps from the EDI gateway itself. The Version 2.6 code for these measures assumed that all timestamps were based on central time, when, in fact, TAG was on eastern time, EDI is on central time, and the LNP gateway is on eastern time. As a result of this discrepancy, BellSouth's performance in Version 2.6 data is understated due to the fact that an hour is inappropriately added to the interval in some cases. Overall, these changes increase reported performance by 1-3% for Reject Interval and a negligible amount for FOC Timeliness. With April 2002 data, BellSouth fixed this issue.

Second, BellSouth had identified an issue with the OSS downtime exclusion for xDSL. The Version 2.6 code did not exclude OSS downtime from the interval calculations for fully mechanized Reject Interval and FOC timeliness, even though the SQM contains an exclusion for OSS downtime. This problem with Version 2.6 code, which was corrected in Version 4.0, made BellSouth's performance look worse than it actually was.

Third, BellSouth had identified an issue in which in certain situations SOCS might recycle service order numbers during a single calendar month. In certain rare situations on both BellSouth retail and CLEC orders, SOCS may generate duplicate service order numbers in the same month. When this rare situation occurs, only the most recent service order appears in the measurement feed. This does not affect the provisioning of CLEC or BellSouth orders and was fixed with April 2002 data.

Lastly, BellSouth had identified an issue in Version 2.6 in which in the WFA system, CPE and information tickets, which are not trouble tickets for which BellSouth is responsible, are being counted as troubles rather than being excluded from the measurement consistent with the SQM. Consequently, when there is a real trouble on that line, PMAP erroneously counts it as a repeat trouble. There is a minimal impact on results. For example, based on December data, both the retail analogue and CLEC data are overstated by less than 0.5%.

The second category of expected differences are due to enhancements to BellSouth's reporting capabilities that were implemented with Version 4.0. The enhancements include an adjustment for cross-boundary wire centers, enhanced product mapping, and the enhanced exclusion of official/administrative data. While these items represent

improvements in the Version 4.0 code, they are not defects in the Version 2.6 code. For example, Version 2.6 divided data by state by using the wire center location; Version 4.0 uses the end user location. While neither approach is wrong, BellSouth believed that the latter method simply is a better way to present the data.

In addition to the two categories of expected differences discussed above, during the validation of Version 4.0, BellSouth discovered certain minor errors with the Version 2.6 code, each of which was corrected in the Version 4.0 code. These issues are also set forth in the Georgia notifications.

In the PMR-5 Data Replication Audit, KCI has replicated 91% of the 271 charts for three months in the Version 2.6 environment. For the Version 4.0 data, if KCI has replicated a Version 2.6 sub-metric for 2 or 3 months, KCI will replicate 1 additional month of Version 4.0 data. If KCI has replicated a Version 2.6 sub-metric for 1 month, KCI will replicate 2 months of Version 4.0 data. If KCI has not replicated any months of Version 2.6 data, it will replicate 3 months of Version 4.0 data. In addition, if an exception/observation exists for a sub-metric, KCI will replicate 3 months of Version 4.0 data.

Issues surrounding the upgrade to Version 4.0 are being considered as well by the GPSC. On June 17, 2002, BellSouth and SECCA filed a joint proposal with the GPSC outlining a process pursuant to which the parties and the Commission could review BellSouth's upgrade to Version 4.0 with April data. In summary, the parties agreed that within fourteen days, the Commission would hold a workshop at which BellSouth will explain in detail the changes outlined in its filings of May 23, 2002, and June 4, 2002

(the April Data Notifications). Within fourteen days after the workshop, interested parties will have the opportunity to file written comments or objections concerning the April changes and BellSouth will have a reasonable opportunity to file a written response to the comments if necessary.

The Commission adopted this joint proposal at its Agenda Session on June 18, 2002. Consequently, a workshop was held, under the auspices of the GPSC, at which the changes BellSouth made to the measurement calculations with April, May, June and July 2002 data were discussed and are being considered by the GPSC. Notably, no ALEC objected to any of the April changes, or the proposed changes, at the workshop.

As discussed above, the Version 4.0 data have been, and will continue to be, subject to the same validation processes that the FCC viewed favorably in the Georgia and Louisiana application, namely BellSouth's internal monthly validation, the fact that ALECs have monthly access to their ALEC-specific raw data to validate reported results, and the fact that BellSouth stands ready to engage in data reconciliation through its ALEC Interface Group.

In conclusion, BellSouth's performance data are reliable and will provide this Commission a meaningful yardstick by which to assess BellSouth's performance. Consequently, the Commission can, and should, rely on BellSouth's performance data to render a decision on BellSouth's 271 application.

Summary of Florida Performance Metrics Audit Status

The following summary describes the current results of the Florida metrics evaluation and explains why this test supports BellSouth's position that its performance data are reliable. As in Georgia, none of the Florida exceptions (open or closed) related to the current SQM reveal any significant issues with BellSouth's performance data.

KCI issued the Report on June 21, 2002 and a FL OSS Testing Evaluation Monthly Status Report on June 30, 2002 (Attachment 1. These reports combined with the FL Metrics Exceptions Attachment 2 provide detailed status of the Florida Audit currently being conducted. According to the Report, KCI stated that the Performance Metrics Reporting domain consisted of five tests, and contained 542 evaluation criteria. All 542 evaluation criteria remain testing in progress due to the introduction of PMAP 4.0. In the PMAP 2.6 environment 369 or the 532 (68%) of the evaluation criteria had been satisfied prior to the release of PMAP 4.0.

As of July 9, 2002 KCI has issued 32 PMAP 2.6 exceptions in Florida based on its audit of the SQM that is similar to the Georgia SQM (i.e. after June 2001). Of those, 18 currently are closed or in the closure process. Of the total of 32, 17 have no impact on reported results, 13 has less than 0.5% impact on reported results, 1 has less than 0.5% impact on reported results for all states other than Florida which has a greater than 0.5% impact, and finally 1 has a greater than 0.5% impact on reported results. A description of all of the Florida Exceptions, open and closed, is Attachment 2. For example, Exceptions 15, 81 and 153 relate to issues with BellSouth's performance measurements documentation, which, as previously discussed, does not impact the

validity of reported results. Moreover, Exception 122 relates to the production of an LSR detail report for xDSL orders, and Exception 152 relates to an issue unique to the SQM Reports. These issues are illustrative of exceptions that do not impact the reported results in the MSS. As BellSouth's analyses make clear, none of the Florida Exceptions indicate systemic problems with BellSouth's reported results.

Additionally, KCI has issued two new exceptions in the PMAP 4.0 environment. One of the exceptions has no impact on report results and the other has less than 0.5% impact on reported results.

In short, BellSouth's performance data collection processes, validation processes, and data production processes have been audited extensively. The open exceptions are minor, and present no credible challenge to the overall reliability of BellSouth's performance data. In reviewing BellSouth's joint Georgia and Louisiana application, this Commission found that "BellSouth has also provided extensive evidence to demonstrate that the exceptions generated on its audits did not suggest a material difference on important metrics that the Commission traditionally examines." *BellSouth GA/LA Order ¶* 18. Likewise, the impact of open exceptions at this time does not demonstrate material or significant issues with BellSouth's data.

Florida Commercial Data Review

KCI, at the request of the FPSC, conducted a Commercial Data Review for the state of Florida for the months of January, February and March 2002 based on BellSouth's published Monthly State Summary reports. This methodology used by KCI in this review aggregated the ALEC average for all three months and compared the weighted

averaged to the FPSC-mandated benchmark or retail analogue, as appropriate. The result of this study indicated that BellSouth met 78% of the appropriate benchmark or retail analogue during the three-month period. As shown in the Executive Summary of this affidavit, using more meaningful methodologies, BellSouth's monthly total was 85% or higher in each of the three months and 87% for the 3 month review.

First, BellSouth does not include the FOC and Reject Completeness – Multiple Response sub-metrics in its calculations. The LNP Disconnect Timeliness measure is also excluded. For the Average Jeopardy Notice Interval sub-metrics, BellSouth did not include them until March 2002 in its parity calculations. The exclusion of these sub-metrics increases the overall percentage in the Commercial Data Study from 78% to 81% for January through March 2002. Next, BellSouth looks at the sub-metrics on a monthly basis and then on a three-month basis to compare its overall performance. The monthly data provides an indication of any major change that may occur in performance that may be masked by only reviewing a three-month calculation. In reviewing the data for a three-month period BellSouth only includes sub-metrics that have ALEC activity in all three months. The purpose of this methodology is to eliminate any measures that are one-time type activities that may skew the overall performance patterns. The sub-metrics that meet or exceed the parity requirements for two of the three months are considered a yes in the overall calculations. Finally, the weighted average used by KCI in the Commercial Data Study for Florida does not take into consideration the possible effect of values that may skew the results. An example of this would be an ordering measure that only had data in one month or where one month was much larger than the other two months. In this scenario, the data does not indicate an average performance for the three-month period, but gives you the performance of

the one large month. This may provide a higher or lower percentage of results, especially for sub-metrics that do not consistently have ALEC activity. The scenario provided by KCI is only one of the many methods available in determining performance results for BellSouth.

Moreover, KCI's analysis fails to provide a meaningful assessment of BellSouth's performance in that it weighs every measure and every sub-metric equally. In reality, the Commission needs to review specific key measures and sub-metrics to truly assess BellSouth's performance (i.e. hot cut measures or collocation measures). BellSouth provides this Commission with a detailed analysis of BellSouth's performance in Exhibit-1.

When viewed in the appropriate context, BellSouth's performance is comparable to, or exceeds, BellSouth's performance in Georgia and Louisiana. Moreover, even under KCI's analysis, BellSouth's performance demonstrates BellSouth's compliance with the competitive checklist.

April Florida Performance Summary

Since KCI conducted its commercial data review, BellSouth has filed its April 2002 MSS results and Discussion of Performance Measurements Data (Attachment 3). Below is an overview of BellSouth's April results.

The MSS contains 2,330 sub-metrics based on the GPSC Docket 7892-U. There were 885 sub-metrics for which there was ALEC activity in April 2002 and that were compared to either benchmarks or retail analogues (excluding FOC & Reject Response

Completeness-Multiple Response and LNP Disconnect Timeliness, as explained in the attachment. BellSouth met or exceeded the criteria for 761 of these 885 sub-metrics, or 86%.

During the three-month period, February through April 2002, again adjusting for the measures mentioned above where appropriate, there were a total of 799 sub-metrics that had ALEC activity for all three months and that were compared with either benchmarks or retail analogues. Of these 799 sub-metrics, 695 sub-metrics (87%) satisfied the comparison criteria in at least two of the three months.

The performance for each checklist item is described below. Checklist Items 4, 5, and 11 are all separate products that were rolled up into the Unbundled Network Elements Checklist Item 2.

Checklist Item 1: Interconnection

1. Collocation

BellSouth provides three separate collocation reports: 1) Average Response Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.

BellSouth met the approved benchmarks for all 9 of the 9 sub-metrics that had ALEC activity in February, for all 11 of the 11 benchmarks that had ALEC activity in March and for all 10 of the 10 benchmarks that had ALEC activity in April 2002.

For the three-month period, February through April 2002, there were 9 sub-metrics for which there was ALEC activity in all three months and were compared

to retail analogues or benchmarks. All 9 of these sub-metrics met the retail analogue/benchmark comparisons in all three months.

2. Local Interconnection Trunking

In February BellSouth met 22 of 24 sub-metrics or 92% and in March 2002, met 24 of the 25 sub-metrics or 96% of the applicable benchmarks/analogues for all local interconnection trunking measures having ALEC activity. In April 2002, BellSouth met all 25 of the 25 sub-metrics or 100% of the benchmarks/retail analogues having ALEC activity.

Checklist Item 2: Unbundled Network Elements

The performance for Checklist Item 2 also includes Checklist Item 4: Unbundled Local Loops, Checklist Item 5: Unbundled Local Transport, and Checklist Item 11: Number Portability. These are all based on the modes of entry for MSS and have been rolled up to show the performance of the Checklist Items.

In general, the Ordering function is disaggregated into 17 sub-metrics, the Provisioning function has 19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair function. All Ordering measures will be included in this checklist item because of the overall relationship of the mechanized, partially mechanized and manual processing of LSRs.

An overall review of the UNE sub-metrics for Ordering, Provisioning, Maintenance & Repair and Billing indicates that BellSouth met the

benchmark/analogue for 84% of the sub-metrics each month for February, March and April 2002.

For the three-month period, February through April 2002, there were 447 sub-metrics in the UNE measurements for which there was ALEC activity in all three months and that were compared to retail analogues or benchmarks. Of those 447 sub-metrics, 380 sub-metrics (85%) met the retail analogue/benchmark comparisons in at least two of the three months.

Checklist Item 4: Unbundled Local Loops

Checklist Item 4 was previously discussed in Checklist Item 2.

Checklist Item 5: Unbundled Local Transport

Checklist Item 5 was previously discussed in Checklist Item 5.

Checklist Item 6: Unbundled Local Switching

The data in these measures indicate that BellSouth met the benchmark/analogue requirements for all measurements in Checklist Item 6 for February, March and April 2002 for which there was ALEC activity.

Checklist Item 7a & 7b: 911 and E911 Services and Directory Assistance/Operator Services

BellSouth met the benchmark/analogue requirements of Checklist Items 7a and 7b in February, March and April 2002. Even though BellSouth tracks and reports these measures, the processes used in providing these services are designed to provide parity for all users.

Checklist Item 10: Access to Databases and Associated Signaling

BellSouth met the required benchmarks for all four of the four sub-metrics associated with this checklist item in February and April 2002 and met three of the four sub-metrics in March 2002.

Checklist Item 11: Number Portability

This checklist's items performance is rolled up into Checklist Item 2. Refer to Attachment 3 Apr '02 PM Data) for more detailed information.

Checklist Item 14: Resale

BellSouth has met or exceeded the benchmarks/analogues for 86% of the 213 Resale metrics for the month of February, for 84% of the 220 metrics in March and for 88% of the 223 metrics in April 2002.

For the three-month period, February through April 2002, there were 204 sub-metrics in the Resale measurements for which there was ALEC activity in all three months and were compared to retail analogues or benchmarks. Of those 204 sub-metrics, 179 sub-metrics (88%) met the retail analogue/benchmark comparisons in at least two of the three months.

In addition to the checklist performance that is listed above, two general issues can impact the degree to which BellSouth's performance data is meaningful. First, the extreme disaggregation of the data in the reports often dilutes the universe size of individual measurements, which in turn reduces the confidence level of each of the individual Z-test results. As a result, there are many performance measurements for which the results are statistically inconclusive due to the small number of observations. Second, in situations in which there are a large number of observations and the difference between the means is very small, the results can be misleading and not indicative of the absolute level of performance that BellSouth provides to ALECs.

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

The second issue arises in situations where BellSouth provides very high quality service to both BellSouth's retail units and the ALECs, where there are very large universe sizes, and the difference between the means is very small. This scenario can cause an apparent missed condition from a quantitative viewpoint. For example, in April 2002, the % Missed Installation Appointments (%MIA), for Resale Residence / Non-Dispatch / < 10 Circuits (A.2.11.1.1.2) showed that BellSouth retail had 0.16% missed appointments for the 681,747 scheduled orders. The ALEC %MIA for the same period is 0.26% missed appointments for

56,111 scheduled orders. While there is very little difference in the results, only one tenth of a percentage point, the universe is so large that the Z-test becomes overly sensitive to any difference. As a result, the statistical test shows that the sub-metric missed the standard criteria, but BellSouth's actual performance is at a very high level for both the ALECs and BellSouth retail, in this case, over 99.7%. From a practical point of view, the ALECs' ability to compete has not been hindered, even though the statistical result does not technically meet the retail analogue.

In reviewing the data, the FPSC should use the data as a tool in analyzing whether BellSouth has met its commitments. It is not a substitute for the qualitative evaluation of BellSouth's performance. The commission will still need to conduct a qualitative assessment of the data that considers, among other things, universe size, distributional properties of the data, as well as overall performance.

Each sub-metric designated as having not satisfied the benchmark or BellSouth retail analogue requirement for February, March and/or April 2002 is included in this Attachment. Each sub-metric discussed is labeled as being missed in any one or more of the months (February/March/April) included in this filing. For more detailed performance measurements results associated with each checklist item, refer to Attachment 3.

CONCLUSION

Based on all the evidence before the commission, there is no question that BellSouth provides ALECs with nondiscriminatory access to its OSS. BellSouth believes that the third party test combined with its actual performance data, confirms this. Over 97 percent of the criteria that KCI tested passed. Several of the deficiencies have been addressed by actual commercial usage. In addition, BellSouth has taken the necessary action to improve performance in those areas where results were unsatisfactory. BellSouth's recent actual performance, as reflected in its performance reports, shows that BellSouth is meeting a very high percentage of the benchmarks and standards adopted by the state commissions and authorities. Finally, this Commission will be able to monitor these issues through these same performance measures as well as the penalty plans that are already in place.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

ANALYSIS OF PERFORMANCE MEASUREMENTS DATA

TABLE OF CONTENTS

I. Introduction	3
II. Analysis of Performance Measurements	3
A. Introduction	3
B. Checklist Item 1 – Interconnection	7
C. Checklist Item 2 – Unbundled Network Elements	13
D. Checklist Item 4 – Unbundled Local Loops	59
E. Checklist Item 5 – Unbundled Local Transport	83
F. Checklist Item 6 – Unbundled Local Switching	85
G. Checklist Item 7a – 911 and E911 Services	85
H. Checklist Item 7b – Directory Assistance/Operator Services	86
I. Checklist Item 10 - Access To Database & Associated Signaling	87
J. Checklist Item 11 – Number Portability	88
K. Checklist Item 14 – Resale	91
III. Summary	119

1 Attachments:

- 2 1H January 2002 Florida Summary Results
- 3 2H January 2002 Flow-Through Report
- 4 1I February 2002 Florida Summary Results
- 5 2I February 2002 Flow-Through Report
- 6 1J March 2002 Florida Summary Results
- 7 2J March 2002 Flow-Through Report
- 8 1K April 2002 Florida Summary Results
- 9 2K April 2002 Flow-Through Report
- 10 3K January - April 2002 Trunk Group Performance Report
- 11 4 BellSouth / CLEC Action Plan for Clarification Reduction
- 12
- 13
- 14

1 **ANALYSIS OF PERFORMANCE MEASUREMENTS DATA**

2
3 **I. INTRODUCTION**

4
5 1. This Exhibit presents BellSouth's performance measurements data in Florida
6 for January through March 2002. The data covers each of the twelve
7 categories of measurements listed in the Interim Service Quality
8 Measurements (SQM): (1) Operations Support Systems (OSS) / Pre-Ordering;
9 (2) Ordering; (3) Provisioning including Customer Coordinated Conversions
10 (CCC or Hot Cuts); (4) Maintenance and Repair; (5) Billing; (6) Operator
11 Services (Toll) and Directory Assistance; (7) Database Update Information;
12 (8) E911; (9) Trunk Group Performance; (10) Collocation; (11) Change
13 Management; and (12) Bona Fide / New Business Request Process. Each of
14 these categories is subdivided into measurements as described below. These
15 measurements are further broken down into sub-metrics, which is the level at
16 which performance data is actually provided.

17
18
19 **II. ANALYSIS OF PERFORMANCE MEASUREMENTS**

20
21 **A. Introduction**

22
23 2. Attachment 1J is the Monthly State Summary (MSS) for Florida for March
24 2002. The MSS contains 2,330 sub-metrics based on the Georgia Public

1 Service Commission (GPSC) Docket 7892-U. As shown in Attachment 1J, in
2 March 2002, BellSouth met or exceeded the benchmark/retail analogue
3 criteria for 741 of 874 sub-metrics, or 85%, for which there were both
4 established benchmarks/retail analogues and CLEC activity. In February
5 2002, BellSouth met or exceeded the benchmark/retail analogue criteria for
6 737 of 863 sub-metrics, or 85%, for which there were both established
7 benchmarks/retail analogues and CLEC activity. In January 2002, BellSouth
8 met or exceeded the benchmark/retail analogue criteria for 747 of 860 sub-
9 metrics, or 87%, for which there were both established benchmarks/retail
10 analogues and CLEC activity.

- 11
- 12 3. As explained previously, three of the measures were identified by BellSouth
13 as having deficiencies in their calculations and were investigated and
14 evaluated for appropriate program code corrections. These three measures
15 were Average Jeopardy Notice Interval, FOC & Reject Completeness
16 (including the "Multiple Responses" sub-metrics), and LNP Disconnect
17 Timeliness. The Average Jeopardy Notice Interval (AJNI) measure had been
18 capturing data that was not meaningful. BellSouth corrected this issue
19 beginning with the release of February 2002 data for the % Jeopardy Notice
20 ≥ 48 hours metric and with the release of March data for AJNI metric. The
21 sub-metrics for this measure are not included in any calculations for January
22 2002. The sub-metrics for AJNI are not included in any calculations for
23 February 2002. A variation on the FOC & Reject Response Completeness (O-
24 11) measurement, FOC/Reject Completeness (Multiple Responses), indicates

1 the proportion of times that multiple FOCs/Rejects for an LSR are returned.
2 The Georgia PSC did not order this measure to be implemented. Also, this
3 measurement can be misleading because sometimes multiple responses are
4 required for efficient operation of the business, such as when a second FOC is
5 returned to notify a CLEC when a jeopardy is cleared. Consequently, while
6 BellSouth reports data on this measure in the Monthly State Summary,
7 BellSouth has not included it in the calculation of performance measurements
8 that had CLEC activity and has not addressed those sub-metrics in this
9 Exhibit. The LNP Disconnect Timeliness measure is under review by the
10 Georgia PSC. These measures are included in the MSS and in the total
11 number of measurements calculation (2,330), but are excluded from the
12 “Met/Total” (741/874) percentage calculations.

- 13
- 14 4. A more meaningful way to look at the data is in 3-month increments.
15 BellSouth calculated a 3-month result that includes all sub-metrics that are
16 compared to a retail analogue or benchmark and had activity in each of the
17 three months of January through March 2002. The three-month figure is not
18 an average of the individual months. Rather, it is an analysis of those
19 submetrics that had data for all three months. The three-month denominator is
20 the total number of submetrics that have data in all three months. The
21 numerator is the number of those submetrics that had “yes” in any two of the
22 three months.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

5. During the three-month period, January through March 2002, again adjusting for the measures mentioned above where appropriate, there were a total of 792 sub-metrics that had CLEC activity for all three months and that were compared with either benchmarks or retail analogues. Of these 792 sub-metrics, 689 sub-metrics (87%) satisfied the comparison criteria in at least two of the three months.

6. BellSouth's performance results are equally strong for each of the major modes of entry in Florida. BellSouth's results in the following categories are based on the percentage of all sub-metrics that had CLEC activity for all three months and met or exceeded the statistical criteria for at least two of the last three months (January – March 2002) included with this Exhibit.

- For Resale, BellSouth met or exceeded the criteria for 171 of the 199 sub-metrics or 86% for at least two of the last three months,
- For UNE, BellSouth met or exceeded the criteria for 384 of the 445 sub-metrics or 86% for at least two of the last three months,
- For Local Interconnection Trunks (LIT), BellSouth met or exceeded the criteria for 24 of the 25 sub-metrics or 96% for at least two of the last three months,
- For OSS, BellSouth met or exceeded the criteria for 76 of the 84 sub-metrics or 90% for at least two of the last three months,
- For Collocation, BellSouth met or exceeded the criteria for 8 of the 8 sub-metrics or 100% for all three of the last three months.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

7. For the coordinated conversions (*i.e.*, hot cuts) BellSouth met the 15 minute benchmark for 17,577 of the 17,615 scheduled conversions (B.2.12) or greater than 99.7% for the three month period of January through March 2002. The average interval for each cutover was 2:44 minutes (minutes: seconds) during this period.
8. Each sub-metric designated as having not satisfied the benchmark or BellSouth retail analogue requirement for January, February and/or March 2002 is included in this Exhibit. Each sub-metric discussed is labeled as to the month(s) the misses occurred (January/February/March).
9. The following paragraphs will address specific performance measurements associated with each checklist item.

B. CHECKLIST ITEM 1 – INTERCONNECTION

Collocation

10. BellSouth provides three separate collocation reports: 1) Average Response Time; 2) Average Arrangement Time and 3) Percent of Due Dates Missed. Section E, Items E.1.1.1 through E.1.3.3, provides these results. BellSouth met the approved benchmarks for 100% of all collocation opportunities in each of the sub-metrics with CLEC activity in January, February and March 2002.

1 **Local Interconnection Trunking**

2 **Trunking Reports**

3 11. Section C, Items C.1.1 to C.4.2 of the MSS contains data for ordering,
4 provisioning, maintenance and repair, and billing associated with Local
5 Interconnection Trunks.

6
7 12. In January, February and March 2002, BellSouth met the applicable
8 benchmarks/analogues for 20 of the 25 (80%), 22 of the 24 (92%) and 24 of
9 the 25 (96%) local interconnection trunking sub-metrics having CLEC
10 activity.

11
12 13. Over the January through March 2002 period, BellSouth returned over 97% of
13 the rejected LSRs to the CLECs within the 4-day benchmark period. This is
14 much higher than the 85% within 4-days benchmark for this measure.
15 Similarly, BellSouth returned over 96% of FOCs to the CLECs within the 10-
16 day benchmark interval, exceeding the 95% within 10-days benchmark.

17
18 14. BellSouth completed the installation appointments by their due dates for all 85
19 of the 85 (100%) Local Interconnection Trunk orders over the January
20 through March 2002 period. There were no provisioning troubles reported
21 within 30 days for the 4,371 CLEC local interconnection trunks installed
22 during the three-month period.

23

1 15. BellSouth completed repair orders on or before their due dates for all 60 of the
2 60 troubles reported for CLEC local interconnection trunks during the January
3 through March 2002 period. There were only 6 repeat troubles reported
4 during the three-month period, and there were no service outages that lasted
5 longer than 24 hours.

6
7 16. The sub-metrics that did not meet the benchmarks/retail analogues for
8 January, February and/or March 2002 are as follows:

9
10 FOC Timeliness / Local Interconnection Trunks (C.1.3) (January)

11 17. BellSouth met the 10-day benchmark interval for 147 of the 159 FOCs
12 (92.45%) returned for this sub-metric in January 2002. The 95% benchmark
13 required that 152 of the 159 FOCs meet the standard interval, based on the
14 number of orders in the period. BellSouth met the benchmark for this sub-
15 metric in February and March 2002.

16
17 Order Completion Interval / Local Interconnection Trunks (C.2.1) (February)

18 18. The average order completion interval for CLEC orders for this sub-metric for
19 February was 21.96 days compared to 15.49 days for the BellSouth retail
20 analogue. There were no systemic issues identified in February 2002 for any
21 of the local interconnection trunks. BellSouth met the retail analogue
22 comparison for this sub-metric in January and March 2002.

23

1 Customer Trouble Report Rate / Local Interconnection Trunks / Dispatch

2 (C.3.2.1) (January)

3 19. In January 2002, there were only 3 troubles reported for the 142,560 lines in
4 service for the sub-metric, a trouble report rate of only 0.002%. BellSouth
5 provided over 99.9% trouble free service for both retail and CLEC orders in
6 this sub-metric for the month. When BellSouth provisions high quality service
7 coupled with very large universe sizes, it can cause an apparent out of equity
8 condition from a quantitative viewpoint. In these cases, there is very little
9 variation and the universe size is so large that the Z-test becomes overly
10 sensitive to any difference. In other words, the statistical test shows that the
11 measurement does not meet the fixed critical value when compared with the
12 retail analogue, but BellSouth's actual performance for both CLECs and its
13 own retail operations is at a very high level – in this case over 99%. From a
14 practical point of view, the CLECs' ability to compete has not been hindered
15 even though the statistical results may technically show that BellSouth failed
16 to meet the benchmark/analogue. BellSouth met the retail analogue for this
17 sub-metric in February and March 2002.

18
19 Customer Trouble Report Rate / Local Interconnection Trunks / Non-Dispatch

20 (C.3.2.2) (January)

21 20. In January 2002, there were 53 troubles reported for the 142,560 lines in
22 service for the sub-metric, a trouble report rate of only 0.04%. BellSouth
23 provided over 99.9% trouble free service for both retail and CLEC orders in
24 this sub-metric for the month. When BellSouth provisions high quality

1 service coupled with very large universe sizes, it can cause an apparent out of
2 equity condition from a quantitative viewpoint. In these cases, there is very
3 little variation and the universe size is so large that the Z-test becomes overly
4 sensitive to any difference. In other words, the statistical test shows that the
5 measurement does not meet the fixed critical value when compared with the
6 retail analogue, but BellSouth's actual performance for both CLECs and its
7 own retail operations is at a very high level – in this case over 99%. From a
8 practical point of view, the CLECs' ability to compete has not been hindered
9 even though the statistical results may technically show that BellSouth failed
10 to meet the benchmark/analogue. BellSouth met the retail analogue for this
11 sub-metric in February and March 2002.

12
13 Maintenance Average Duration / Local Interconnection Trunks / Non-Dispatch

14 (C.3.3.2) (January)

15 21. In January 2002, appropriate adjustment of the duration interval data for
16 orders in this sub-metric to exclude the “non-circuit specific” troubles would
17 have produced a CLEC result better than for the retail analogue. BellSouth
18 met the retail analogue comparison for this sub-metric in February and March
19 2002.

20
21 % Repeat Troubles within 30 Days / Local Interconnection Trunks (C.3.4.2)

22 (January/March)

23 22. In January 2002 there were 4 repeat troubles for this sub-metric. In actuality,
24 all four of the reports were due to routing troubles and should not have been

1 included in this measure. This reporting related error was corrected in January
2 2002. In March 2002, there were only two orders for the sub-metric.
3 BellSouth met the retail analogue comparison for this sub-metric in February
4 2002.

5
6 Invoice Accuracy – Interconnection (C.4.1) (February)

7 23. The CLECs experienced Local Interconnection invoice accuracy rates in
8 February that were slightly less than for the invoices BellSouth sent to its
9 customers (97.86% accuracy for BellSouth versus 97.34% for the CLEC
10 invoices). The difference in performance was the result of adjustments given
11 to customers who were billed for some rate elements for which they should
12 not have been billed because of bill and keep provisions in their contracts.
13 These bill and keep rate elements were not distinguishable in the contract so
14 the corresponding rate element fields were populated with non-zero amounts
15 on the rate file. As a result, a new process was implemented which requires
16 all bill and keep rate element Universal Service Order Codes (USOCs) be
17 followed by “BK” so that the rate groups will know to zero rate these
18 elements. BellSouth met the retail analogue comparison for this sub-metric in
19 January and March 2002.

20
21 Trunk Blockage

22 24. BellSouth has developed a trunk blocking report that compares BellSouth
23 retail’s trunk blockage rates to those of CLECs. The report, Trunk Group
24 Performance Report (TGP) displays trunk blocking in a manner that more

1 accurately represents the customer experience than previous reports BellSouth
2 produced. The TGP report tabulates actual call blocking as a percentage of
3 call attempts for all comparable trunk groups administered by BellSouth that
4 handle CLEC and BellSouth traffic. Additionally, the TGP report provides a
5 direct comparison of hour-by-hour blocking between CLEC and BellSouth
6 trunk groups. Report C.5.1 shows that BellSouth in Florida met or exceeded
7 the retail analogue for all three of the three months included with this filing.
8

9 25. The Trunk Group Categories included in the Trunk Group Performance
10 measurement are as follows:

11 For Traffic Terminating at CLEC End Offices:

- 12 • Category 1 (BellSouth End-Office to BellSouth Access Tandem)
- 13 • Category 3 (BellSouth End-Office to CLEC Switch)
- 14 • Category 4 (BellSouth Local Tandem to CLEC Switch)
- 15 • Category 5 (BellSouth Access Tandem to CLEC Switch)
- 16 • Category 10 (BellSouth End-Office to BellSouth Local Tandem)
- 17 • Category 16 (BellSouth Inter-Tandem Trunk Groups)

18 For Traffic Terminating at BellSouth End Offices:

- 19 • Category 9 (BellSouth End-Office to BellSouth End-Office)

20
21 26. BellSouth's SQM also describes how BellSouth derives and calculates its
22 performance data, including trunk blockage data. In addition, Section C.5.1,
23 TGP shows the actual blocking percentages by hour. See Attachment 3K for
24 further details. The analogue/benchmark for the Trunk Group Performance

1 measure is any two consecutive hour period in 24 hours where CLEC
2 blockage exceeds BellSouth blockage by more than 0.5%. The 0.5%
3 difference is appropriate because of the network design layouts and the size of
4 the CLEC trunk groups compared with the large BellSouth groups. Although
5 the current measure is a significant improvement over the previous report, the
6 current measure is not perfect, and BellSouth has requested that the GPSC
7 modify this measure to include Category I, Category 10, and Category 16
8 trunk groups in the “BellSouth affecting” trunk categories.

9
10 **C. CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS**

11 **(UNE)**

12
13 27. This section addresses the measures associated with UNEs under checklist
14 item 2. Attachment 1J, Sections B.1 – B.3, provides data that is divided into
15 Ordering, Provisioning and Maintenance & Repair operations. The Ordering
16 function is disaggregated into 17 sub-metrics. The Provisioning function has
17 19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair
18 function. All Ordering measures will be included in this checklist item
19 because of the overall relationship of the electronic, partially electronic and
20 manual processing of Local Service Requests (LSRs). The Provisioning and
21 Maintenance & Repair measures for the following products are included in the
22 checklist item as shown below:

23
24 Product Checklist Item:

1	Combo (Loop & Port)	#2 – Unbundled Network Elements
2	Combo (Other)	#2 – Unbundled Network Elements
3	Other Design	#2 – Unbundled Network Elements
4	Other Non-Design	#2 – Unbundled Network Elements
5	xDSL Loop	#4 – Unbundled Local Loops
6	UNE ISDN Loop	#4 – Unbundled Local Loops
7	Line Sharing	#4 – Unbundled Local Loops
8	2w Analog Loop Design	#4 – Unbundled Local Loops
9	2w Analog Loop Non Design	#4 – Unbundled Local Loops
10	2w Analog Loop w/INP Design	#4 – Unbundled Local Loops
11	2w Analog Loop w/INP Non Design	#4 – Unbundled Local Loops
12	2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
13	2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops
14	Digital Loop < DS1	#4 – Unbundled Local Loops
15	Digital Loop => DS1	#4 – Unbundled Local Loops
16	Local Interoffice Transport	#5 – Unbundled Local Transport
17	Switch Ports	#6 – Unbundled Local Switching
18	INP Standalone	#11 – Local Number Portability
19	LNP Standalone	#11 – Local Number Portability

20

21 28. An overall review of the UNE sub-metrics for Ordering, Provisioning,
 22 Maintenance & Repair and Billing indicates that BellSouth met the
 23 benchmark/analogue for 88%, 84% and 84% of the sub-metrics during the
 24 months of January, February and March 2002, respectively.

1
2 29. For the three-month period, January through March 2002, there were 445 sub-
3 metrics in the UNE measurements for which there was CLEC activity in all
4 three months and that were compared to retail analogues or benchmarks. Of
5 those 445 sub-metrics, 384 sub-metrics (86%) met the retail
6 analogue/benchmark comparisons in at least two of the three months.
7

8 **UNE Ordering Measures**
9

10 30. Items B.1.1 – B.1.19 in the MSS show data for Percent Rejected Service
11 Requests, Reject Interval, FOC Timeliness and FOC & Reject Response
12 Completeness. These reports are disaggregated by interface type (electronic,
13 partial electronic and manual), as well as product type.
14
15

16
17 **Percent Rejected Service Requests**
18

19 31. Results for individual CLECs in this measure vary widely with many CLECs
20 achieving very low reject rates. The percentages vary widely among the
21 products and manner of submission, electronic or manual, for these CLECs.
22 In order to lower the rejection rate for individual CLECs, BellSouth has
23 developed an action plan template to be used in conjunction with an analysis
24 of the pre-order and order activity of CLECs. The action plan focuses on
25 CLECs who perform at less than 90% on flow-through on mechanically

1 submitted orders and has a clarification rate of 20% or higher. So far, 14
2 CLECs in the BellSouth region have agreed to utilize this template. Eighteen
3 additional CLECs have had presentations concerning their individual results
4 and are currently reviewing the proposals. BellSouth continues to revisit
5 many of the CLECs because of major turnover in personnel. This is the main
6 issue in trying to reduce the overall clarification rate for many of the CLECs.
7 The experience level of the personnel continues to be very low in the majority
8 of the CLECs.

9 32. The action plan is CLEC specific and contains current data about all LSRs,
10 whether they are submitted manually or electronically. Attachment 4 to this
11 exhibit is a current action plan that is being worked with one of the active
12 CLECs within the BellSouth region. The "Top Error Descriptions" are
13 identified and the recommendation for improvement for both BellSouth and
14 the CLEC are included. For this CLEC, the analysis includes fatal rejects,
15 auto clarifications and manual rejects with specific examples and Purchase
16 Order Numbers (PON) of the LSRs. Calculations are also provided as to the
17 magnitude on the overall performance of these errors. Finally, the targeted
18 areas for improvement are agreed upon with a projected time frame for the
19 improvement to begin. The responsible personnel in both the CLEC and
20 BellSouth sign this document.

21
22 Reject Interval

1 33. Items B.1.4 - B.1.8 examine the Reject Interval measurement. For the three-
2 month period January through March 2002, BellSouth returned over 88% of
3 rejected LSRs to the CLECs within the applicable benchmark interval. For
4 orders submitted electronically, the benchmark is 97% within one hour. In
5 January, February and March 2002, 80%, 73% and 86%, respectively, of all
6 rejected electronic service requests were delivered within the one-hour
7 benchmark interval. (See the write-up below for Items B.1.4.2 – B.1.4.17 for
8 further discussion concerning electronically submitted orders.)
9

10 34. For partially mechanized orders, which are LSRs submitted electronically and
11 requiring BellSouth service representative intervention, the benchmark is 85%
12 returned within 10 hours. BellSouth exceeded these benchmarks in January,
13 February and March 2002, with 95%, 93% and 92%, respectively, of partially
14 mechanized rejects being returned to the CLECs within the benchmark
15 interval.
16

17 35. For manual orders, the current benchmark is 85% within 24 hours. BellSouth
18 also exceeded this requirement, with over 99% of the LSRs submitted
19 manually being returned to the CLECs within the 24-hour time period in each
20 of the three months.
21

22 36. The following sub-metrics did not meet the established benchmarks in
23 January, February and/or March 2002:
24

- 1 Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3)
- 2 (January/February/March)
- 3 Reject Interval / UNE ISDN / Electronic (B.1.4.6) (March)
- 4 Reject Interval / Line Sharing / Electronic (B.1.4.7) (January/February/March)
- 5 Reject Interval / 2w Analog Loop Design / Electronic (B.1.4.8)
- 6 (January/February/March)
- 7 Reject Interval / 2w Analog Loop Non-Design / Electronic (B.1.4.9)
- 8 (January/February/March)
- 9 Reject Interval / 2w Analog Loop w/LNP Design / Electronic (B.1.4.12)
- 10 (January/February)
- 11 Reject Interval / Other Design / Electronic (B.1.4.14) (January/February/March)
- 12 Reject Interval / Other Non-Design / Electronic (B.1.4.15)
- 13 (January/February/March)

14 37. The current benchmark for these sub-metrics is $\geq 97\%$ within one hour. For
15 those LSRs for which BellSouth did not meet the benchmark, BellSouth has
16 conducted a detailed root cause analysis of the process for electronic rejects.
17 This analysis addresses the ordering systems (EDI, TAG, and LENS) used by
18 the CLECs and the back-end legacy applications, such as SOCS, that are
19 accessed by the ordering systems. BellSouth's root cause analysis determined
20 that a number of LSRs that did not meet the one-hour benchmark were
21 submitted when back-end legacy systems were out of service and were unable
22 to process the LSRs. Because such LSRs should be excluded from the
23 measurement, BellSouth implemented a coding change in PMAP, intended to
24 ensure that scheduled OSS downtime was properly excluded. The coding

1 change assumed that EDI and TAG timestamps reflected Eastern Time.
2 However, the timestamps used by EDI and TAG actually reflects Central
3 Time. As a result of this discrepancy, an hour was being added during PMAP
4 timestamp “synchronization,” which caused the results to inaccurately reflect
5 the Reject Interval duration. A change to address this issue for EDI was
6 implemented effective with February 2002 data, and a similar update for TAG
7 was completed with the release of April 2002 data.

8 38. In addition to the system downtime issue, with the implementation of the
9 GPSC *January 16, 2001 Order*, BellSouth was directed to change the time
10 stamp identification for the start and complete times of the interval for this
11 measurement. The time stamp was changed from the Local Exchange
12 Ordering (“LEO”) System to the CLEC ordering interface system (TAG or
13 EDI). With this change BellSouth was temporarily unable to identify multiple
14 issues of the same version of LSRs that are fatally rejected, which should be
15 excluded from the measurement. If there are multiple issues of the same
16 version, the measure currently calculates the FOC and reject interval such that
17 BellSouth’s performance appears to be worse than it actually is. The interval
18 is calculated from the initial issue date and time of the LSR to the return of a
19 non-fatal reject or FOC. No exclusion applies for the amount of time it takes
20 the CLEC to resubmit it after it is fatally rejected. Consequently, BellSouth’s
21 performance level is inappropriately understated. BellSouth has identified a
22 fix for this issue and will be adding a “transaction identification” to each

1 version of the LSR that will allow PMAP to properly identify the beginning
2 time stamp. The EDI system was corrected with release of February data and
3 the TAG update was implemented effective with April 2002 data.

4
5 39. BellSouth has also identified a LESOG application defect that affects the
6 Reject Interval measure. Currently, the Working Service on Premise indicator
7 is not verified prior to the FOC. If this indicator is not populated on orders for
8 additional lines, the order is manually clarified back to the CLEC during post-
9 FOC error handling. With implementation of the fix for this defect, the
10 systems will verify the Working Service on Premise indicator prior to the
11 issuance of a FOC for LSRs attempting to add additional lines. The fix for
12 this defect is scheduled for implementation with June data.

13
14 Reject Interval / UNE ISDN / Partially Electronic (B.1.7.6) (February)

15 40. There were only ten LSRs rejected for this sub-metric in February 2002. The
16 small universe of orders for the month does not provide a conclusive
17 benchmark comparison for this sub-metric. BellSouth met the benchmark for
18 this sub-metric in March 2002. There was no CLEC activity for this sub-
19 metric in January 2002.

20
21 Reject Interval / Line Sharing / Partially Electronic (B.1.7.7) (January/February)

22 41. BellSouth met the 10-hour benchmark interval for 21 of the 34 LSRs rejected
23 in January and for 67 of the 83 LSRs rejected in February 2002. The 85%

1 benchmark required that 29 of the 34 rejects for January and 71 of the 83
2 rejects for February be returned within the benchmark interval. BellSouth met
3 the benchmark for this sub-metric in March 2002.

4
5 Reject Interval / 2w Analog Loop Design / Partially Electronic (B.1.7.8) (March)

6 42. BellSouth met the 10-hour benchmark interval for 161 of the 190 (84.74%)
7 LSRs rejected for this sub-metric in January 2002. Normal rounding
8 convention indicates that there is no significant difference between the results
9 for this sub-metric and the benchmark. BellSouth met the benchmark for this
10 sub-metric in January and February 2002.

11
12 Reject Interval / 2w Analog Loop Non-Design / Partially Electronic (B.1.7.9)

13 (February/March)

14 43. BellSouth met the 10-hour benchmark interval for 114 of the 147 rejected
15 LSRs for this sub-metric in February and for 201 of the 283 rejected LSRs in
16 March 2002. The 85% benchmark required that 125 of the 147 orders for
17 February and 241 of the 283 orders for March be returned within 10 hours.
18 BellSouth met the benchmark for this sub-metric in January 2002. BellSouth
19 continues to focus on this measurement in order to improve results to meet the
20 benchmark.

21
22 Reject Interval / 2w Analog Loop w/LNP Design / Partially Electronic (B.1.7.12)

23 (February/March)

1 44. BellSouth met the benchmark for 220 of the 275 of the LSRs rejected in this
2 sub-metric for February and for 232 of the 288 LSRs rejected in March 2002.
3 The 85% benchmark required that 224 of the 275 rejects for February and 274
4 of the 288 rejects for March be returned within the benchmark interval.
5 BellSouth met the benchmark for this sub-metric in January 2002. BellSouth
6 continues to focus on this measurement in order to improve results to meet the
7 benchmark.

8
9 Reject Interval / 2w Analog Loop w/LNP Non-Design / Partially Electronic
10 (B.1.7.13) (January/February/March)

11 45. BellSouth met the benchmark for 633 of the 747 rejected LSRs for this sub-
12 metric in January, for 426 of the 543 rejected LSRs in February and for 639 of
13 the 840 rejected LSRs in March 2002. The 85% benchmark required that 635
14 of the 747 orders for January, 462 of the 543 orders for February and 714 of
15 the 840 orders for March be returned within the benchmark interval.
16 BellSouth continues to focus on this measurement in order to improve results
17 to meet the benchmark.

18
19 FOC Timeliness

20 46. BellSouth met the applicable benchmark interval for over 97% of all FOCs
21 returned for CLEC LSRs for the January through March 2002 period. For
22 LSRs submitted electronically, the benchmark is 95% of the FOCs returned
23 within 3 hours. For the January through March 2002 period, BellSouth

1 exceeded this benchmark with over 99% of all electronically processed FOCs
2 returned within the 3-hour interval.

3
4 47. For partially electronic LSRs, the benchmark is 85% returned within 10 hours.

5 BellSouth exceeded this benchmark for the January through March period
6 with over 93% of all FOCs for partially electronic LSRs returned within 10
7 hours.

8
9 48. For LSRs submitted manually, the benchmark is 85% returned within 36
10 hours. . For the January through March 2002 period, BellSouth exceeded this
11 benchmark with over 99% of all manually processed FOCs returned within
12 the 36-hour benchmark interval.

13
14 49. The sub-metrics that did not meet the benchmark in the January through
15 March 2002 were as follows:

16
17 FOC Timeliness / UNE ISDN / Electronic (B.1.9.6) (February/March)

18 50. BellSouth met the 3-hour benchmark interval for 16 of the 18 FOCs returned
19 for this sub-metric in February and for 51 of the 54 FOCs returned in March
20 2002. The 95% benchmark set a requirement that all 18 of the 18 FOCs for
21 February and 52 of the 54 FOCs for March meet the interval. BellSouth met
22 the benchmark for this sub-metric in January 2002.

23
24 FOC Timeliness / Line Sharing / Electronic (B.1.9.7) (February)

1 51. BellSouth met the benchmark for 144 of the 152 LSRs (94.74%) that received
2 a FOC in February 2002. Normal rounding convention indicates that there is
3 no significant difference between the result for this sub-metric and the
4 benchmark. BellSouth met the benchmark for this sub-metric in January and
5 March 2002.

6
7 FOC Timeliness / xDSL / Partially Electronic (B.1.12.5) (March)

8 52. BellSouth met the 10-hour benchmark for 16 of the 22 FOCs returned for this
9 sub-metric in March 2002. The 85% benchmark required that 19 of the 22
10 orders be returned, based on the number of orders for this sub-metric.

11 BellSouth met the benchmark for this sub-metric in January and February
12 2002.

13
14 FOC Timeliness / 2w Analog Loop Design / Partially Electronic (B.1.12.8)

15 (March)

16 53. BellSouth met the benchmark for 271 of the 319 LSRs (84.95%) that received
17 a FOC in March 2002. Normal rounding convention indicates that there is no
18 significant difference between the result for this sub-metric and the
19 benchmark. BellSouth met the benchmark for this sub-metric in January and
20 February 2002.

21
22 FOC Timeliness / Other Design / Partially Electronic (B.1.12.14)

23 (January/February/March)

1 54. BellSouth met the 10-hour benchmark interval for 75 of the 96 FOCs returned
2 for this sub-metric in January, for 146 of the 180 FOCs returned in February
3 and for 78 of the 92 FOCs returned in March 2002. The 85% benchmark set
4 requirements of 82 of the 96 orders in January, 153 of the 180 orders in
5 February and 79 of the 92 orders for March, based on the quantity of orders in
6 the sub-metric

7
8 FOC & Reject Response Completeness / 2w Analog Loop w/LNP Non-Design /
9 TAG / Electronic (B.1.14.13.2) (February)

10 55. BellSouth met the benchmark standard for 134 of the 147 responses for this
11 sub-metric in February 2002. The 95% benchmark required that the criteria
12 be met for 140 of the 147 responses based on the number of orders for this
13 sub-metric. BellSouth met the benchmark for this sub-metric in January and
14 March 2002.

15
16 FOC & Reject Response Completeness / Local Interoffice Transport / Manual
17 (B.1.16.2) (January/March)

18 56. BellSouth met the benchmark standard for 47 of the 51 responses for this sub-
19 metric in January and for 66 of the 71 responses returned in March 2002. The
20 95% benchmark required that the criteria be met for 49 of the 51 responses in
21 January and for 68 of the 71 responses in March, based on the number of
22 orders for this sub-metric. BellSouth met the benchmark for this sub-metric in
23 February 2002.

24

1 FOC & Reject Response Completeness / Combo (Loop & Port) / Manual

2 (B.1.16.3) (January/March)

3 57. BellSouth met the benchmark standard for 694 of the 755 responses for this
4 sub-metric January and for 1,357 of the 1,473 responses returned in March
5 2002. The 95% benchmark required that the criteria be met for 718 of the 755
6 responses in January and for 1,400 of the 1,473 responses returned in March,
7 based on the number of orders for this sub-metric. BellSouth met the
8 benchmark for this sub-metric in February 2002.

9
10 FOC & Reject Response Completeness / UNE ISDN / Manual (B.1.16.6)

11 (January)

12 58. BellSouth met the benchmark standard for 633 of the 673 responses for this
13 sub-metric in January 2002. The 95% benchmark required that the criteria be
14 met for 640 of the 673 responses, based on the number of orders for this sub-
15 metric. BellSouth met the benchmark for this sub-metric in February and
16 March 2002.

17
18 FOC & Reject Response Completeness / Line Sharing / Manual (B.1.16.7)

19 (January)

20 59. BellSouth met the benchmark standard for 185 of the 203 responses for this
21 sub-metric in January 2002. The 95% benchmark required that the criteria be
22 met for 193 of the 203 responses, based on the number of orders for this sub-
23 metric. BellSouth met the benchmark for this sub-metric in February and
24 March 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

FOC & Reject Response Completeness / 2w Analog Loop Non-Design / Manual
(B.1.16.9) (January)

60. BellSouth met the benchmark for 1,239 of the 1,309 responses for this sub-metric in January 2002. The 95% benchmark set a requirement 1,104 orders, based on the number of orders for this sub-metric. BellSouth met the benchmark for this sub-metric in February and March 2002.

FOC & Reject Response Completeness / 2w Analog Loop w/INP Non-Design / Manual (B.1.16.11) (March)

61. BellSouth met the benchmark standard for 13 of the 14 responses for this sub-metric in March 2002. The 95% benchmark required that the criteria be met for all 14 of the 14 responses. BellSouth met the benchmark for this sub-metric in and January and February 2002.

FOC & Reject Response Completeness / Other Design / Manual (B.1.16.14) (January)

62. BellSouth met the benchmark standard for 598 of the 648 responses for this sub-metric in January 2002. The 95% benchmark required that the criteria be met for 616 of the 648 responses, based on the number of orders for this sub-metric. BellSouth met the benchmark for this sub-metric in February and March 2002.

Flow-Through

1 63. Attachment 1J, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated
 2 by customer type and for the Summary/Aggregate. The following table shows
 3 the Regional Flow-Through results for the January through March 2002
 4 period as compared with the Interim SQM benchmarks.

5
 6 % Flow-through Service Requests (F.1.1.1 – F.1.3.4)

<u>Customer Type</u>	<u>January 2002</u>	<u>February 2002</u>	<u>March 2002</u>	<u>Benchmark</u>
Residence	88.56%	87.17%	86.49%	95%
Business	74.56%	75.20%	73.55%	90%
UNE	85.50%	84.86%	83.88%	85%
LNP	92.81%	94.12%	92.25%	85%

7
 8 64. The table above excludes those LSRs designed to “fall out” for manual
 9 handling. The business flow-through rate is well below the 90% objective.
 10 Business LSRs are more complex than the typical LSRs and, as a result, there
 11 is a greater probability for error. For example, an LSR requesting 10 lines
 12 with series completion hunting that are located over multiple floors and have a
 13 variation of features on the lines presents many more opportunities for system
 14 mismatches than one that adds just lines and features.

15
 16 65. BellSouth has established a Flow-Through Improvement Program
 17 Management process that includes seven different internal organizations.
 18 Ongoing analysis is being done to determine trends and identify flow-through
 19 problems. To date, fifteen system enhancements have been identified and are

1 targeted for Encore releases. Three of the enhancements were implemented in
2 August, five enhancements implemented in November and two enhancements
3 implemented in January 2002. The remainder of the enhancements is
4 scheduled for release during 2002.

5
6 **UNE Provisioning Measures**

7 66. BellSouth met 88% of the overall UNE Provisioning measurements in the
8 month of January, 82% of these measurements in February and 84% in March
9 2002.

10
11 67. The following sub-metrics did not meet the applicable retail analogues in the
12 months of January, February and/or March 2002:

13
14 Order Completion Interval / Combo (Loop & Port) / < 10 Circuits / Switch Based
15 Orders (B.2.1.3.1.3) (January/February/March)

16 68. This sub-metric is a further disaggregation of Item B.2.1.3.1.2. The
17 completion interval difference between the CLEC result and the result for the
18 BellSouth retail analogue for this sub-metric was less than 0.01 days in each
19 of the three months. Both measures were approximately one-third day. This
20 indicates virtually identical service for both the CLECs and the retail analogue
21 for each month.

22
23 Order Completion Interval / Combo Other / < 10 Circuits / Dispatch (B.2.1.4.1.1)
24 (January/February/March)

1 69. The primary factor for the miss in this sub-metric is that the standard
2 installation interval for this product is 10 days. This is much longer than for
3 the retail analogue product. Even though the committed dates to the customer
4 are being met, the intervals are longer than for the retail analogue product.

5
6 Order Completion Interval / Other Non-Design / < 10 Circuits / Dispatch

7 (B.2.1.15.1.1) (March)

8 70. In March 2002, 23 of the 35 CLEC orders for this sub-metric carried a
9 standard installation interval of 5 days. This interval is longer than the
10 “available in 3 days” standard set for the retail analogue. BellSouth met the
11 retail analogue comparison for this sub-metric in January and February 2002.

12
13 Order Completion Interval / Other Non-Design / < 10 Circuits / Non-Dispatch

14 (B.2.1.15.1.2) (March)

15 71. There were 26 orders completed for this sub-metric in March 2002. The
16 average completion interval for the CLEC orders was 1.9 days compared to .9
17 days for the retail analogue. No systemic installation issues were identified
18 for the orders in this sub-metric. BellSouth met the retail analogue
19 comparison for this sub-metric in January and February 2002.

20
21 % Jeopardies / Combo Other (B.2.5.4) (February/March)

22 72. There were nine orders for this sub-metric placed in jeopardy status in
23 February and four orders placed in jeopardy in March 2002. All of these
24 jeopardy situations were resolved prior to the order due dates and were

1 completed as scheduled. BellSouth met the retail analogue for this sub-metric
2 in January 2002.

3
4 % Jeopardies / Other Non-Design (B.2.5.15) (January)

5 73. There were a total of 2 jeopardies issued for the 25 orders scheduled for this
6 sub-metric in January 2002. While the data indicates that BellSouth placed a
7 higher percentage of CLEC orders in jeopardy status, all of the jeopardies
8 were resolved prior to the due dates, and the orders were completed on time.
9 BellSouth met the retail analogue comparison for this sub-metric in February
10 and March 2002.

11
12 % Jeopardy Notice >= 48 Hours / Combo (Loop & Port) / Electronic (B.2.10.3)
13 (February)

14 74. BellSouth met the 48-hour benchmark for 17 of the 18 jeopardy notices for
15 this sub-metric in February 2002. The 95% benchmark required that all 18 of
16 18 notices meet the 48-hour interval. As was discussed in the Introduction
17 section, the coding for this measurement was undergoing modification in
18 January 2002. BellSouth met the retail analogue comparison for this sub-
19 metric in March 2002.

20
21 % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /
22 Dispatch (B.2.18.3.I.1) (March)

23 75. BellSouth missed 46 of the 998 scheduled appointments in this sub-metric for
24 March 2002. BellSouth is investigating the data underlying this sub-metric to

1 determine the accuracy of the apparent disparity with the retail analogue in
2 March. BellSouth met the retail analogue comparison for this sub-metric in
3 January and February 2002.

4
5 % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /
6 Non-Dispatch (B.2.18.3.1.2) (January/February/March)

7 76. BellSouth missed 32 of the 11,490 scheduled appointments in this sub-metric
8 for January, missed 29 of the 12,390 appointments for February and missed 48
9 of the 20,137 appointments for March 2002. BellSouth met over 99% of the
10 scheduled appointments for both retail and CLEC orders in this sub-metric for
11 all three months. When BellSouth provisions high quality service coupled
12 with very large universe sizes, it can cause an apparent out of equity condition
13 from a quantitative viewpoint. In these cases, there is very little variation and
14 the universe size is so large that the Z-test becomes overly sensitive to any
15 difference. In other words, the statistical test shows that the measurement
16 does not meet the fixed critical value when compared with the retail analogue,
17 but BellSouth's actual performance for both CLECs and its own retail
18 operations is at a very high level – in this case over 99%. From a practical
19 point of view, the CLECs' ability to compete has not been hindered even
20 though the statistical results may technically show that BellSouth failed to
21 meet the benchmark/analogue.

22
23 % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /
24 Switch Based Orders (B.2.18.3.1.3) (February)

1 77. This is a further disaggregation of Item B.2.18.3.1.2, above. BellSouth missed
2 only 1 of the 6,007 appointments in this sub-metric scheduled for February
3 2002. BellSouth met over 99% of the scheduled appointments for both retail
4 and CLEC orders in this sub-metric for the month. When BellSouth
5 provisions high quality service coupled with very large universe sizes, it can
6 cause an apparent out of equity condition from a quantitative viewpoint. In
7 these cases, there is very little variation and the universe size is so large that
8 the Z-test becomes overly sensitive to any difference. In other words, the
9 statistical test shows that the measurement does not meet the fixed critical
10 value when compared with the retail analogue, but BellSouth's actual
11 performance for both CLECs and its own retail operations is at a very high
12 level – in this case over 99%. From a practical point of view, the CLECs'
13 ability to compete has not been hindered even though the statistical results
14 may technically show that BellSouth failed to meet the benchmark/analogue.
15 BellSouth met the retail analogue comparison for this sub-metric in January
16 and March 2002.

17
18 % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /
19 Dispatch In (B.2.18.3.1.4) (January/February/March)

20 78. This is a further disaggregation of Item B.2.18.3.1.2, above. BellSouth missed
21 32 of the 5,576 appointments in this sub-metric scheduled in January, missed
22 28 of the 6,383 appointments scheduled in February and missed 49 of the
23 9,201 appointments scheduled for March 2002. BellSouth completed over
24 99% of the appointments as scheduled in January, February and March 2002.

1 From a practical point of view, the CLECs' ability to compete has not been
2 hindered even though the statistical results may technically show that
3 BellSouth failed to meet the benchmark/analogue.

4

5 % Missed Installation Appointments / Combo (Loop & Port) / >= 10 Circuits /
6 Dispatch (B.2.18.3.2.1) (January)

7 79. BellSouth completed 14 of the 19 installation appointments scheduled for this
8 sub-metric in January 2002. There were no patterns or systemic installation
9 issues identified for any of the 5 missed appointments. BellSouth met the
10 retail analogue for this sub-metric in February and March 2002.

11

12 % Missed Installation Appointments / Combo Other / < 10 Circuits / Dispatch
13 (B.2.18.4.1.1) (January)

14 80. BellSouth missed 9 of the 125 installation appointments scheduled for this
15 sub-metric in January 2002. None of these missed appointments resulted in
16 held orders. No systemic installation issues or patterns were identified for
17 these missed appointments. BellSouth met the retail analogue comparison for
18 this sub-metric in February and March 2002.

19

20 % Missed Installation Appointments / Other Non-Design / < 10 Circuits / Non-
21 Dispatch (B.2.18.15.1.2) (March)

22 81. BellSouth missed 2 of the 29 installation appointments scheduled for this sub-
23 metric in March 2002. No systemic installation issues or patterns were

1 identified for these two missed appointments. BellSouth met the retail
2 analogue comparison for this sub-metric in January and February 2002.

3
4 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /
5 Dispatch (B.2.19.3.1.1) (February)

6 82. There were 57 troubles reported for this sub-metric in February 2002 for the
7 779 orders completed in the prior 30 days. Of the 57 total reports, 18 reports
8 were closed to “no trouble found.” Without these reports, the CLEC measure
9 would have been better than for the retail analogue. BellSouth met the retail
10 analogue comparison for this sub-metric in January and March 2002.

11
12 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / >= 10 Circuits /
13 Dispatch (B.2.19.3.2.1) (February)

14 83. There were only 4 troubles reported for this sub-metric in February 2002.
15 There were no patterns or systemic installation issues identified for these 4
16 reports. BellSouth met the retail analogue comparison for this sub-metric in
17 January and March 2002.

18
19 % Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch
20 (B.2.19.4.1.1) (February/March)

21 84. BellSouth is currently checking the data for this sub-metric to verify that the
22 appropriate trouble reports are being included in the measurement. Of the 11
23 troubles reported for March, 4 reports (36%) were closed as “no trouble

1 found.” BellSouth met the retail analogue comparison for this sub-metric in
2 January 2002.

3
4 % Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch In
5 (B.2.19.4.1.4) (February)

6 85. BellSouth is currently checking the data for this sub-metric to verify that the
7 appropriate trouble reports are being included in the measurement. There was
8 no CLEC activity for this sub-metric in either January or March 2002.

9
10 % Provisioning Troubles w/i 30 Days / Other Design / < 10 Circuits / Dispatch
11 (B.2.19.14.1.1) (February)

12 86. There were only 2 troubles reported for the 20 orders completed in the 30 days
13 prior to February 2002 for this sub-metric. No patterns or systemic
14 installation issues were identified for the two troubles. BellSouth met the
15 retail analogue comparison for this sub-metric in January and March 2002.

16
17 % Provisioning Troubles w/i 30 Days / Other Non-Design / < 10 Circuits / Non-
18 Dispatch (B.2.19.15.1.2) (February)

19 87. There were only five orders completed for this sub-metric in the 30 days prior
20 to February 2002. The small universe of orders for this sub-metric does not
21 provide a statistically conclusive comparison to the retail analogue. BellSouth
22 met the retail analogue comparison for this sub-metric in January and March
23 2002.

1 Average Completion Notice Interval / Combo (Loop & Port) / < 10 Circuits /

2 Dispatch In (B.2.21.3.1.4) (January/February)

3 88. The difference between the average notice intervals for CLECs and the retail
4 analogue for this sub-metric in January 2002 was less than 8 minutes. The
5 root cause analysis of this measure indicated that the only differences between
6 the performance between BellSouth retail and CLECs are the mismatches
7 found when the orders are compared with the original LSRs. The start of the
8 completion interval is the point at which the technician completes the order,
9 and the interval ends when the completion notice is sent. Any change to a
10 name, number of items, etc., occurring during the provisioning process will
11 generate inconsistencies with the original LSRs that must be resolved before a
12 final completion notice can be sent. Any time to resolve these inconsistencies
13 with the original LSRs is included in the average. Because of numerous
14 CLEC changes and order updates, mismatches on CLECs orders exceed those
15 for BellSouth retail orders. Combining this with the smaller base for the
16 CLECs' measurement raises the average, which results in a miss. Specific
17 Service Representatives within the Work Management Centers have been
18 assigned to resolve any completion issues that are required. Providing
19 specific training and dedicating personnel to this task should reduce the
20 difference between the CLEC and retail analogue results. BellSouth met the
21 retail analogue comparison for this sub-metric in March 2002.

22
23 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Dispatch

24 (B.2.34.1.2.1) (February)

1 89. In February 2002, BellSouth met the standard criteria for 27 of the 29 orders
2 (93.10%) reviewed. The 95% benchmark set a requirement that 28 of the 29
3 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
4 January and March 2002.

5
6 **UNE Maintenance and Repair (M&R) Measures**

7 90. BellSouth met the applicable performance standard for 87% in January, 83%
8 in February and 82% in March 2002 of the overall UNE M&R measurements.
9 The sub-metrics that did not meet the fixed critical value for this checklist
10 item in January, February and/or March 2002 are as follows:

11
12 **% Missed Repair Appointments / Combo (Loop & Port) / Non-Dispatch**

13 **(B.3.1.3.2) (March)**

14 91. BellSouth completed 1,690 of the 1,720 repair appointments as scheduled for
15 this sub-metric in March 2002. This represented an over 98% completion rate
16 for the month. There were no systemic maintenance issues identified for the
17 missed appointments. From a practical point of view, the CLECs' ability to
18 compete has not been hindered even though the statistical results may
19 technically show that BellSouth failed to meet the benchmark/analogue.
20 BellSouth met the retail analogue comparison for this sub-metric in January
21 and February 2002.

22
23 **% Missed Repair Appointments / Other Design / Dispatch (B.3.1.10.1) (February)**

1 92. BellSouth completed 13 of the 15 repair appointments as scheduled for this
2 sub-metric in February 2002. There were no systemic maintenance problems
3 identified for the two missed appointments. BellSouth met the retail analogue
4 comparison for this sub-metric in January and March 2002.

5
6 % Missed Repair Appointments / Other Non-Design / Non-Dispatch (B.3.1.11.2)
7 (March)

8 93. BellSouth missed only 2 of the 51 repair appointments scheduled for this sub-
9 metric in March 2002. No systemic problems or patterns were identified for
10 the missed appointments. BellSouth met the retail analogue comparison for
11 this sub-metric in January and February 2002.

12
13 Customer Trouble Report Rate / Combo Other / Dispatch (B.3.2.4.1)
14 (February/March)

15 94. There were a total of 34 trouble reports for this sub-metric for the 1,434 lines
16 in service in February and 34 trouble reports for the 1,527 lines in service in
17 March 2002. Both the CLECs and BellSouth retail customers received more
18 than 97% trouble free service for two-month period. From a practical point of
19 view, the CLECs' ability to compete has not been hindered even though the
20 statistical results may technically show that BellSouth failed to meet the
21 benchmark/analogue. BellSouth met the retail analogue comparison for this
22 sub-metric in January 2002.

1 Customer Trouble Report Rate / Combo Other / Non-Dispatch (B.3.2.4.2)

2 (February)

3 95. There were a total of 36 trouble reports for this sub-metric for the 1,434 lines
4 in service in February 2002. Of the 36 total trouble reports, 19 (53%) were
5 closed to “no trouble found.” Both the CLECs and BellSouth retail customers
6 received more than 97% trouble free service for the month. From a practical
7 point of view, the CLECs’ ability to compete has not been hindered even
8 though the statistical results may technically show that BellSouth failed to
9 meet the benchmark/analogue. BellSouth met the retail analogue comparison
10 for this sub-metric in January and March 2002.

11
12 Customer Trouble Report Rate / Other Design / Dispatch (B.3.2.10.1)

13 (January/February/March)

14 96. The difference between the results for the retail analogue and the CLEC
15 aggregate was 1.1% or less in January and February, and 1.2% in March 2002.
16 Both the CLECs and BellSouth retail had greater than 98% trouble free
17 service for all in service lines in this sub-metric in all three months. Of the 15
18 total troubles reported in February 2002, 40% were closed as “no trouble
19 found,” indicating minimal impact on the customer. In March, 5 of the 13
20 total trouble reports were the result of one facility problem in one central
21 office. From a practical point of view, the CLECs’ ability to compete has not
22 been hindered even though the statistical results may technically show that
23 BellSouth failed to meet the benchmark/analogue.

1 Customer Trouble Report Rate / Other Non-Design / Dispatch (B.3.2.11.1)

2 (January/February/March)

3 97. There were a total of 47 trouble reports for the 616 in service lines for this
4 sub-metric in January, 71 trouble reports for the 619 lines in service in
5 February and 67 trouble reports for the 590 lines in service in March 2002.
6 Continuing analysis is underway to determine if any systemic issues or data
7 reporting problems exist with this sub-metric.

8
9 Customer Trouble Report Rate / Other Non-Design / Non-Dispatch (B.3.2.11.2)

10 (January/February/March)

11 98. There were a total of 49 troubles reports for the 616 in service lines for this
12 sub-metric in January, 46 troubles reported for the 619 lines in service in
13 February and 51 troubles reported for the 590 in service lines for March 2002.
14 An analysis revealed that 36 of the 49 trouble reports (73%) for January, 26 of
15 the 46 reports (57%) for February and 25 of the 51 trouble reports (49%) for
16 March 2002 were closed out as “no trouble found,” or about half to two-thirds
17 of the troubles reported had minimal impact on the end-user customer.
18 Continuing analysis is underway to determine if any systemic issues exist with
19 this sub-metric.

20
21 Out of Service > 24 Hours / Other Design / Dispatch (B.3.5.10.1) (February)

22 99. There were two service affecting trouble reports for this sub-metric in
23 February 2002 that caused service outages longer than 24 hours. Neither of

1 these outages revealed a systemic maintenance process issue. BellSouth met
2 the retail analogue comparison for this sub-metric in January and March 2002.

3
4 Out of Service > 24 Hours / Other Non-Design / Dispatch (B.3.5.11.1) (March)

5 100. There were 10 trouble reports out of service longer than 24 hours for this
6 sub-metric in March 2002. Of these 10 outages, 6 were from the same
7 customer and were received on Friday but not cleared until Monday.
8 BellSouth met the retail analogue comparison for this sub-metric in January
9 and February 2002.

10
11 UNE – Billing

12
13 Invoice Accuracy – UNE (B.4.1) (January)

14 101. The CLECs experienced UNE invoice accuracy rates that were slightly
15 less than the rates for the invoices BellSouth sent to its retail customers during
16 January 2002 (98.37% for BellSouth compared to 98.10% for the CLECs).
17 The difference in performance was the result of adjustments made to remove
18 back-billed zone pricing charges from one CLEC customer's UNE account
19 because the customer's contract specifically states that the customer should
20 not be back-billed for zone pricing. In order to prevent this type of problem
21 from occurring in the future, BellSouth has implemented a procedure that
22 requires review of a customer's contracts for back-billing limitations before
23 any back billing is done to the customer's accounts. BellSouth met the retail
24 analogue comparison for this sub-metric for February and March 2002.

1
2 Mean Time to Deliver Invoices – CRIS / Region (B.4.2) (February/March)

3 102. This metric measures the mean interval for timeliness of billing records
4 delivered to CLECs. The CLECs experienced UNE invoice delivery rates that
5 were higher than the rates for BellSouth's retail customers during February
6 and March 2002 (3.64 days for BellSouth versus 6.13 for CLECs in February
7 and 3.68 days for BellSouth compared to 7.51 days for CLECs in March).
8 The difference in performance for both months was the result of bill period
9 delays encountered with BellSouth's billing system upgrade associated with
10 UNE CLEC bills and usage volumes. Processing cycles ran longer than
11 expected. BellSouth is currently working on enhancements that will decrease
12 processing time and speed the delivery of bills that will help to improve
13 performance for this metric. BellSouth met the retail analogue comparison for
14 this sub-metric in January 2002.

15
16 Other UNE Measures

17
18 Pre-Ordering

19 103. Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1)
20 and Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering
21 measurements. BellSouth met the benchmarks for all four of the sub-metrics
22 for these measurements in February and March 2002. The sub-metric that did
23 not meet the benchmarks in January 2002 is as follows:

1 Loop Makeup Inquiry (Electronic) (F.2.2) (January)

2 104. BellSouth met the 1-minute response time benchmark for 1,304 of the
3 1,401 inquiries for this sub-metric in January 2002. The 95% benchmark set a
4 requirement of 1,331 of the 1,401 responses returned within the 1-minute
5 interval. BellSouth met the benchmark for this sub-metric in February and
6 March 2002.

7
8 **Operations Support Systems**

9 105. The OSS measures are included in the MSS data Exhibits under items
10 D.1.1 through D.2.6. BellSouth's performance measurement results
11 demonstrate that the CLECs in Florida are provided nondiscriminatory access
12 to all systems. Through these OSS interfaces, CLECs complete the pre-
13 ordering, ordering and maintenance & repair requirements for gaining access
14 to network elements and/or securing wholesale arrangements. BellSouth
15 makes these OSS interfaces available so that CLECs can gain access to the
16 same systems and processes that BellSouth uses to provide retail services. All
17 OSS measures and sub-metrics are based on regional level results.

18
19 **Pre-Ordering / Ordering**

20
21 Interface Availability – CLEC - Region (D.1.1)

22 106. There are seven systems included in the sub-metrics for this measure with
23 a benchmark of 99.5%. BellSouth met or exceeded the benchmark 100% of
24 the time for all seven systems during January through March 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Interface Availability – BST & CLEC – Region (D.1.2)

107. There are eleven systems that were reported by BellSouth for this measure. All eleven systems met or exceeded the 99.5% benchmark during the January through March 2002 period.

Average Response Interval

108. During the February and March 2002 OSS data review, an “anomaly” was discovered in some of the RNS retail analogue data for OSS response interval. These anomalies dramatically overstated the retail analogue data for six sub-metrics. An example of one of these anomalies occurred in February 2002, when the RNS retail analogue for RSAG requested by address contained 3 transactions with a total of 1,124,100,000 seconds of duration. In other words, the average duration for each of these 3 transactions was nearly 12 years. Obviously, a duration of 12 years is not possible, but, the inclusion of these three transactions caused a 461.28 second RNS retail analogue average. The removal of these 3 anomalies from the retail data reduces the RNS retail analogue results to 2.89 seconds compared with the CLEC results of 1.91 seconds, still meeting the parity requirement. The following table will summarize the six sub-metrics and the associated anomalies for February and March 2002. BellSouth continues to research the cause of the RNS long response intervals for the retail analogue transactions.

EXHIBIT 1
 Florida Varner PM Exhibit
 July 1, 2002

Measure (MSS item #)		# Of Anomalies	Total Seconds	Prior to Removal	After Removal	CLEC Results
February 2002						
RSAG-ADDR	D.1.3.2.1	3	1,124,100,000	461.28	2.89	1.91
(Same analogue)	D.1.4.2.1				2.89	1.59
CRSACCTS	D.1.3.5.1	1	1,035,000,000	199.21	3.25	3.77
OASISBIG	D.1.3.6.1	1	1,035,000,000	105.81	4.34	3.58
(Same analogue)	D.1.3.7.1				4.34	2.34
March 2002						
ATLAS – TN	D.1.3.3.1	1	1,124,100,000	1330.23	2.85	0.88
(Same analogue)	D.1.4.5.1				2.85	1.35
RSAG – TN	D.1.3.1.1	1	1,124,100,000	1440.12	2.93	0.91
(Same analogue)	D.1.4.1.1				2.93	1.10
RSAG-ADDR	D.1.3.2.1	3	1,124,100,000	712.69	2.97	0.91
(Same analogue)	D.1.4.2.1				2.97	1.62

1
2
3
4
5
6
7
8
9
10

Average Response Interval – CLEC (LENS) – Region (D.1.3.)

109. There are a total of seven systems that are included in this measure and they are compared with the retail RNS and ROS systems, plus 2 seconds added for CLEC security screening as included in the order from GPSC. During January through March 2002, all of the systems met or exceeded the retail analogues but one, 41 of 42 sub-metrics. The sub-metric that did not meet the retail analogue comparison was:

1 Average Response Interval / CRSECSRL / ROS / Region (D.1.3.5.2) (February)

2 110. The CLECs received slightly longer response times from this system in
3 February 2002 than for the retail analogue standard (3.77 seconds average for
4 CLECS compared to 3.11 seconds for BellSouth). BellSouth met the retail
5 analogue comparison for this sub-metric in January and March 2002.

6
7 Average Response Interval – CLEC (TAG) – Region (D.1.4)

8 111. There are a total of nine systems that are included in this measure and
9 seven are compared with the retail analogue. During January through March
10 2002, all of the systems met or exceeded the retail analogues.

11
12 **Maintenance & Repair**

13
14 Interface Availability – BST – Region (D.2.1)

15 112. The TAFI system is the BellSouth interface for all retail maintenance and
16 repair tests. During January through March 2002, it was available 100% of
17 the time compared with a 99.5% benchmark.

18
19 Interface Availability – CLEC – Region (D.2.2)

20 113. The TAFI and ECTA systems are the CLEC interfaces for all maintenance
21 and repair tests. During January through March 2002, these systems met or
22 exceeded the benchmark of 99.5% availability for both of the sub-metrics in
23 all three months.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Interface Availability – BST & CLEC – Region (D.2.3)

114. There are seven systems that the CLEC interfaces, TAFI and ECTA, depend upon for additional maintenance and repair tests. In January through March 2002, all of these systems met or exceeded the benchmark of 99.5% availability in all three months.

Average Response Interval / – Region (D.2.4 – D.2.6)

115. Each of the eleven systems included in this measure are compared with a retail analogue and measured in groupings of less than 4 seconds, less than 10 seconds and greater than 10 seconds. During January through March 2002, BellSouth met or exceeded the retail analogue for 76 of the 99 sub-metrics. The sub-metrics that did not meet the retail analogue comparison for this measurement were:

Average Response Interval / CRIS / Region (D.2.4.1) (January/February/March)

116. The average response interval for this sub-metric is measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. The average response interval for the CLEC requests did not meet the retail analogue intervals for the less than 4-second disaggregation but exceeded both the less than 10 and greater than 10 seconds responses. For the 4-second interval, there was only approximately 1% difference between the CLEC responses as compared with the retail analogue in all three months. Both the

1 CLECs and the retail analogue received approximately 99% or more within
2 the less than 10 second response interval. Similarly, for the greater than 10
3 seconds interval measure, the CLECs and the BellSouth retail analogue
4 received approximately 1% or less of responses in over 10 seconds. These
5 very small differences in response intervals indicate equivalent service levels
6 for the CLECs and BellSouth retail.

7
8 Average Response Interval / DLR / Region (D.2.4.3) (January/February/March)

9 117. The average response intervals for these sub-metrics are measured in three
10 separate disaggregations -- the percentage of queries that are responded to in
11 less than 4 seconds, less than 10 seconds and greater than 10 seconds.
12 BellSouth missed the standard for percentage of queries responded to in less
13 than 4 seconds during January, February and March 2002, but met the
14 standards for both the "less than 10 seconds" and "greater than ten seconds"
15 intervals. Even though BellSouth technically missed the standard the
16 difference in performance for the CLECs versus BellSouth's retail analogue
17 was only 1.4% in January, 2.4% in February and 1.9% in March. There is no
18 evidence of disparate performance for this sub-metric.

19
20 Average Response Interval / LMOSupd / Region (D.2.4.5, D.2.5.5, D.2.6.5)

21 (January/February/March)

22 118. The average response interval for this sub-metric is measured in three
23 separate disaggregations -- the percentage of queries that are responded to in
24 less than 4 seconds, less than 10 seconds and greater than 10 seconds. For

1 each of the three sub-metrics, there was less than a 9% difference in the
2 percentage of responses received by the CLECs and BellSouth retail in each
3 month, January through March 2002. Differences of 10%, or less, for these
4 intervals indicate virtually equivalent service levels for both the CLECs and
5 BellSouth retail.

6
7 Average Response Interval / LNP/ Region (D.2.4.6) (January/March)

8 Average Response Interval / LNP/ Region (D.2.5.6, D.2.6.6) (March)

9 119. The average response interval for this measurement is measured in three
10 separate disaggregations -- the percentage of queries that are responded to in
11 less than 4 seconds, less than 10 seconds and greater than 10 seconds. In both
12 January and March 2002, the average response interval for the CLEC requests
13 did not meet the retail analogue interval for the less than 4-second
14 disaggregation but exceeded the less than 10 and greater than 10 seconds
15 responses. In January 2002, both the CLECs and BellSouth retail received
16 over 98.8% of responses in less than 4 seconds and less than 0.3% in more
17 than 10 seconds. The less than one percent difference for these intervals
18 indicates virtually equivalent service levels for the CLECs and BellSouth
19 retail. In March the "less than 4 second" and "less than 10 second" measures
20 for both BellSouth retail and for CLECs was over 99%. The "greater than 10
21 second" measure for both BellSouth retail and for CLECs was less than 0.2%.
22 These performance results also indicate virtually equivalent service being
23 provided for the CLECs and BellSouth retail.

24

1 Average Response Interval / OSPCM / Region (D.2.4.8) (January/March)

2 120. The average response interval for these sub-metrics is measured in three
3 separate disaggregations -- the percentage of queries that are responded to in
4 less than 4 seconds, less than 10 seconds and greater than 10 seconds. In
5 January 2002, the CLEC response interval for the "less than, or equal to 4
6 seconds" measure was 13.92% compared to 26.31% for the retail analogue.
7 In March the CLECs had 13.59% of responses in less than 4 seconds
8 compared to 23.94% for the retail analogue. BellSouth met the retail analogue
9 comparison for all three of the sub-metrics in this measure for February 2002
10 and two out of three in both January and March 2002.

11
12 Average Response Interval / NIW / Region (D.2.4.11) (January/March)

13 121. The average response interval for this sub-metric is measured in three
14 separate disaggregations -- the percentage of queries that are responded to in
15 less than 4 seconds, less than 10 seconds and greater than 10 seconds. In both
16 January and March 2002, the average response interval for the CLEC requests
17 did not meet the retail analogue intervals for the less than 4-second
18 disaggregation but exceeded both the less than 10 and greater than 10 seconds
19 responses. The CLEC response interval was 85.67% within 4 seconds in
20 January, as compared with 87.02% for the retail analogue, and 81.81% within
21 4 seconds in March, as compared to 82.97% for the retail analogue. The small
22 difference between the CLEC and retail analogue results should not impede
23 the CLECs' ability to compete in this area. BellSouth met the retail analogue
24 comparison for this sub-metric in February 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

General – Ordering Center

122. BellSouth is committed to providing the CLECs timely access to its Ordering Center. During the months of January through March 2002, BellSouth exceeded the retail analogue (F.4.1) for the average answer time in all three months for the region. For the three-month period, the CLEC received a 28.64 second speed of answer compared with the retail analogue of 186.73 seconds.

General – Maintenance Center

123. BellSouth is committed to providing the CLECs timely access to its Maintenance Center. During the months of January through March 2002, BellSouth exceeded the retail analogue (F.5.1) for the average answer time for two of the three months for the region. The three-month average was 27.15 seconds for the CLECs compared with 31.66 seconds for retail.

Average Answer Time / Region (F.5.1) (February)

124. BellSouth missed the retail analogue comparison for this measure in February 2002 but met the retail analogue comparison for both January and March 2002.

General – Billing

125. BellSouth has provided the CLECs with excellent billing performance as indicated in the summation of the seven measures below:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Usage Data Delivery Accuracy – Region

126. This measure compares the rate at which usage data are sent accurately to CLECs with the same measure for the BellSouth retail analog. BellSouth met the sub-metric for two of the three months (January through March 2002). BellSouth provided over 99.8% accuracy during this period. The sub-metric that did not meet the BellSouth retail analogue comparison for February 2002 was:

Usage Data Delivery Accuracy (F.9.1) (February)

127. This measure compares the rate at which error-free usage data is sent to CLECs with the same measure for the BellSouth retail analog. The CLECs experienced usage data delivery accuracy rates that were slightly lower than the rates for BellSouth customers during February 2002 (99.85% for BellSouth versus 99.62% for CLECs). The difference in performance was the result of a problem with ODUF pack sequence numbers. This problem did not involve any missing or incorrect usage data from ODUF. The problem only involved ODUF pack sequence numbers which normally go in sequence from '01' to '99' for each customer. After a system problem occurred with the output sequence table on February 19, 2002, the sequence numbers were inadvertently restarted to '01' on all ODUFs for all CLECs. The sequence table was corrected, and the correct pack number for each customer was restarted on February 22, 2002. All CLECs, who questioned BellSouth about this problem, reported that they understood that no usage data was actually

1 missing or incorrect as a result of the problem, and none of the CLECs
2 requested that BellSouth retransmit any ODUF data. Bellsouth met the retail
3 analogue comparison for this sub-metric in January and March 2002.

4
5 Usage Data Delivery Timeliness (F.9.2) (March)

6 128. This measure tracks the percentage of usage data delivered within six
7 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs
8 experienced usage data delivery timeliness rates that were slightly lower than
9 the rates for BellSouth customers during March 2002 (98.37% for BellSouth
10 compared to 93.11% for CLECs). The difference in performance for March
11 was the result of bill period delays encountered with BellSouth's billing
12 system upgrade associated with UNE CLEC bills and usage volumes.
13 Processing cycles ran longer than expected. BellSouth is currently working
14 on enhancements that will decrease processing time and speed the delivery of
15 bills that will help to improve performance for this metric. BellSouth met the
16 retail analogue comparison for this sub-metric in January and February 2002.

17
18 Usage Data Delivery Completeness – Region (F.9.3)

19 129. BellSouth met or exceeded the retail analogue for this measure in all three
20 months in the January through March 2002 period. During this three-month
21 period, 99.79% of all data was delivered to the CLECs.

22
23 Mean Time to Deliver Usage – Region (F.9.4)

1 130. This measure compares the average number of days to deliver usage to
2 CLECs with the BellSouth retail analogue. BellSouth met the retail analogue
3 for three of the three months included with this filing.

4
5 Recurring Charge Completeness - UNE (F.9.5.2)

6 131. This measure tracks the ability of the ordering and billing systems to begin
7 billing a CLEC for UNE elements on the next invoice after an order has
8 “completed”. For UNE and Interconnection orders, the goal is to meet a
9 benchmark of 90%. BellSouth met all of the three sub-metrics during January
10 through March 2002.

11
12 Recurring Charge Completeness – Interconnection (F.9.5.3)

13 132. This measure tracks the ability of the ordering and billing systems to begin
14 billing a CLEC recurring charges for local interconnection services on the
15 next invoice after an order has “completed”. Again, the established
16 benchmark is 90%. BellSouth met all of the three sub-metrics during January
17 through March 2002.

18
19 Non-Recurring Charge Completeness / UNE (F.9.6.2) (January)

20 133. This measure tracks the ability of the ordering and billing systems to begin
21 billing a CLEC non-recurring charges for UNE services on the next invoice
22 after an order has “completed”. A benchmark of 90% has been set as the level
23 of performance to meet. In January 2002, the result was 89.43%. The
24 benchmark was not met in January because of back-billed OSS charges

1 applied to CLEC accounts. These OSS charges are due to BellSouth for
2 handling LSRs that were cancelled by CLEC customers. In the past,
3 BellSouth's systems have not been equipped to apply these cancellation
4 charges. During 2002, BellSouth plans to complete an initiative to bill these
5 OSS charges on a current basis for cancelled LSRs. BellSouth met the
6 benchmark for this sub-metric in February and March 2002.

7
8 Non-Recurring Charge Completeness / Interconnection (F.9.6.3) (January/March)

9 134. This measure tracks the ability of the ordering and billing systems to begin
10 billing a CLEC non-recurring charges for local interconnection services on the
11 next invoice after an order has "completed". A benchmark of 90% has been
12 set as the level of performance to meet. In January and March 2002,
13 BellSouth's performance was 79.45% and 89.14%, respectively. This
14 measure was missed in both months because of problems encountered in
15 correcting service order errors in a timely manner. In January 2002, the
16 benchmark was adversely affected due to back-billed OSS charges applied to
17 CLEC accounts. These OSS charges are due to BellSouth for handling LSRs
18 that were cancelled by CLEC customers. In the past, BellSouth's systems
19 have not been equipped to apply these cancellation charges. During 2002,
20 BellSouth plans to complete an initiative to bill these OSS charges on a
21 current basis for cancelled LSRs.

22
23 135. The benchmark was not met in March because of problems encountered in
24 correcting service order errors in a timely manner. In an effort to prevent this

1 problem from occurring in the future, BellSouth continues to adjust its error
2 handling procedures to recognize, prioritize, work and resolve all errors in a
3 timelier manner. The most recent changes made include the implementation
4 of changes to the error report to capture the next available bill period date for
5 each order. This change will allow BellSouth to prioritize and work errors by
6 bill period. However, since this measure is calculated one month in arrears,
7 the revised error report will be effective and utilized with errors generated in
8 April 2002.

9
10 136. It is also important to point out that the results for this measure are
11 calculated using dollar amounts associated with completed service orders and
12 not by using the actual number of orders. This measure was missed in March
13 as a result of a large amount of money billed late on a relatively small number
14 of orders. BellSouth is currently in the process of trying to develop a way to
15 associate dollar amounts to orders in error before billing has occurred for the
16 orders.

17
18 137. BellSouth met the benchmark for this sub-metric in February 2002.

19 BellSouth continues to monitor results and will adjust procedures as necessary
20 to further improve this metric.

21
22 **General - Change Management**

23
24 % Software Release Notices Sent On Time (F.10.1) (January)

1 138. BellSouth met the benchmark of returning 95% of the software release
2 notices within 30 days for one of the two months that had notices during the
3 three-month period January through March 2002. BellSouth met the
4 benchmark for 2 of the 3 software release notices sent during the January
5 through March 2002 period. BellSouth met the specified benchmark intervals
6 for one of the two software releases issued in January 2002. BellSouth met
7 the benchmark intervals for all releases in February 2002. There were no
8 releases for these sub-metrics in March 2002.

9
10 % Change Management Documentation Sent On Time (F.10.3) (February)

11 Average Documentation Release Delay Days (F.10.5) (February)

12 139. BellSouth met the 30-day benchmark for 4 of the 6 change management
13 documentation packages issued in the January through March 2002 period.
14 There were two Change Management Documentation notices issued in
15 February 2002. Both of the notices for February missed the standard notice
16 interval. The February notices were only one day short of meeting the 25
17 days prior to release benchmark. BellSouth met the benchmark for these sub-
18 metrics in January and March 2002.

19
20 % CLEC Interface Outages Sent within 15 Minutes (F.10.6)

21 140. BellSouth met the 15-minute benchmark for all 55 notices for January
22 through March 2002.

23

1 **General – New Business Requests**

2 141. There was only one new business request submitted for this measure in
3 January through March 2002. BellSouth met the 30-day benchmark in
4 responding to this request.

5
6 **General – Ordering**

7 142. BellSouth is providing timely responses to CLEC ordering requests as
8 indicated by the performance results in this category.

9
10 **% Acknowledgement Message Timeliness / EDI/TAG – Region (F.12.1.1)**

11 143. BellSouth met the 90% within 30 minutes benchmark for 6 of the 6 sub-
12 metrics in January through March 2002.

13
14 **% Acknowledgement Message Completeness / EDI/TAG – Region (F.12.2)**

15 144. BellSouth has delivered over 99.9% of all acknowledgement messages
16 back to the CLECs for the period of January through March 2002. The
17 benchmark for this measure is 100%. BellSouth continues to try and resolve
18 the small numbers of failed acknowledgements in both of the interface
19 systems. For EDI, 100% of all acknowledgements were returned in the three-
20 month period. Of the over 1 million acknowledgements returned in the
21 period, all but 9 were returned for TAG.

22
23 **% Acknowledgement Message Completeness / TAG (F.12.2.2)**

24 **(January/February/March)**

1 145. BellSouth failed to deliver 1 (0.00026%) of the 379,170 messages in
2 January for this sub-metric, 2 (0.00059%) of the 341,453 messages for this
3 sub-metric in February and 6 (0.00179%) of the 334,739 messages in March
4 2002. Analysis continues to identify any issues in this process. However,
5 such a small number of failed records have not revealed any systemic process
6 problems.

7
8 **General – Network Outage Notification**

9
10 Mean Time to Notify CLEC of Network Outage – Region (F.14.1)

11 146. BellSouth is committed to timely CLEC notification of any Network
12 outage that occurs in its system. BellSouth met the retail analogue
13 comparison January through March 2002 for all notices.

14
15 D. **CHECKLIST ITEM 4 – UNBUNDLED LOCAL LOOPS**

16
17 147. As discussed in Checklist Item 2, Sections B.2 and B.3 provide data for
18 provisioning and maintenance & repair measures for unbundled local loops.

19
20 148. For purposes of discussion in this checklist item, the local loop sub-
21 metrics have been separated into two major mode-of-entry groups, xDSL and
22 SL1/SL2/Digital. The xDSL group includes xDSL (ADSL, HDSL, UCL),
23 ISDN and Line Sharing sub-metrics. The SL1/SL2/Digital group includes the

1 design and non-design 2-wire analog loops, as well as the 2-wire and 4-wire
2 digital loop sub-metrics.

3
4 **xDSL Group**

5
6 **Provisioning Measures**

7 149. During the three month period, January through March 2002, BellSouth
8 met the benchmarks/retail analogues for 81 of the 91 xDSL group
9 provisioning sub-metrics having CLEC activity over that period.

10
11 150. The xDSL group sub-metrics that did not meet the fixed critical value
12 comparison requirements for January, February and/or March 2002 are as
13 follows:

14
15 **Order Completion Interval / Line Sharing / < 6 Circuits / Dispatch (B.2.1.7.3.1)**
16 **(March)**

17 151. There were only six orders for this sub-metric in March 2002. BellSouth
18 met the retail analogue comparison for this sub-metric in January and
19 February 2002.

20
21 **Held Orders / UNE ISDN / < 10 Circuits / Facility (B.2.3.6.1.1) (February)**

22 152. There were only two orders for this sub-metric in February 2002. The
23 small universe of orders for this sub-metric does not provide a statistically

1 conclusive comparison to the retail analogue. BellSouth met the retail
2 analogue comparison for this sub-metric in January and March 2002.

3
4 % Jeopardies / UNE ISDN (B.2.5.6) (February/March)

5 153. There were 15 orders placed in jeopardy for facilities reasons for orders in
6 this sub-metric in February and 43 orders put in jeopardy for orders in March
7 2002. All of the February jeopardies and 39 of the 43 March jeopardies were
8 resolved prior to the due dates and the orders completed on time. The 4
9 jeopardies not resolved by the due dates in March were held due to customer
10 reasons. BellSouth met the retail analogue comparison for this sub-metric in
11 January 2002.

12
13 % Jeopardy Notice \geq 48 Hours / xDSL / Electronic (B.2.10.5) (February/March)

14 154. There were only five jeopardy notices issued for this sub-metric in
15 February and ten notices issued in March 2002. As was discussed in the
16 Introduction section, the coding for this measurement was updated with
17 February 2002.

18
19 % Provisioning Troubles within 30 Days / UNE ISDN / < 10 Circuits / Dispatch
20 (B.2.19.6.1.1) (March)

21 155. There were 15 troubles reported for orders that completed for this sub-
22 metric in the prior 30 days for March 2002. BellSouth has implemented an
23 improved procedure to document circuit test results in the order closeout
24 narratives. This initiative, along with added emphasis on cooperative testing

1 procedures, should improve the results for this sub-metric. No patterns or
2 systemic installation issues were identified for the trouble reports for this sub-
3 metric. BellSouth met the retail analogue for this sub-metric in January and
4 February 2002.

5
6 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits / Dispatch
7 (B.2.19.7.1.1) (February)

8 156. There were only seven orders for this sub-metric in February 2002.
9 BellSouth met the retail analogue comparison for this sub-metric in January
10 and March 2002.

11
12 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits / Non-
13 Dispatch (B.2.19.7.1.2) (February)

14 157. There were only thirteen orders completed for this sub-metric in February
15 2002. BellSouth met the retail analogue comparison for this sub-metric in
16 January and March 2002.

17
18 Average Completion Notice Interval / xDSL / < 10 Circuits / Dispatch
19 (B.2.21.5.1.1) (March)

20 158. The root cause analysis of this measure indicated that the only differences
21 between the performance between BellSouth retail and CLECs are the
22 mismatches found when the orders are compared with the original LSRs. The
23 start of the completion interval is the point at which the technician completes
24 the order, and the interval ends when the completion notice is sent. Any

1 change to a name, number of items, etc., occurring during the provisioning
2 process will generate inconsistencies with the original LSRs that must be
3 resolved before a final completion notice can be sent. Any time to resolve
4 these inconsistencies with the original LSRs is included in the average.
5 Because of numerous CLEC changes and order updates, mismatches on
6 CLECs orders exceed those for BellSouth retail orders. Combining this with
7 the smaller base for the CLECs' measurement raises the average, which
8 results in a miss. Specific Service Representatives within the Work
9 Management Centers have been assigned to resolve any completion issues that
10 are required. Providing specific training and dedicating personnel to this task
11 should reduce the difference between the CLEC and retail analogue results.
12 There was no CLEC activity for this sub-metric in either January or February
13 2002.

14
15 **Maintenance & Repair Measures**

16 159. BellSouth met the benchmarks/retail analogues for 72 of the 90 xDSL
17 group maintenance and repair sub-metrics having CLEC activity over the
18 three month period, January through March 2002.

19
20 160. The xDSL group maintenance and repair sub-metrics that did not meet the
21 fixed critical value comparison requirements for January, February and/or
22 March 2002 are as follows:
23

1 % Missed Repair Appointments / UNE ISDN / Non-Dispatch (B.3.1.6.2)

2 (January/February)

3 161. BellSouth completed 41 of the 44 repair appointments as scheduled for
4 this sub-metric in January and 40 of the 41 appointments scheduled for
5 February 2002. There were no patterns or systemic maintenance issues
6 revealed for the 3 missed appointments in January or the 1 missed
7 appointment in February. BellSouth met the retail analogue comparison for
8 this sub-metric in March 2002.

9
10 Missed Repair Appointments / Line Sharing / Non-Dispatch (B.3.1.7.2)

11 (February/March)

12 162. BellSouth completed 28 of the 34 repair appointments as scheduled for
13 this sub-metric in February and 27 of the 37 appointments scheduled for
14 March 2002. There were no patterns or systemic maintenance issues revealed
15 for the 6 missed appointments in February. In March, all ten of the trouble
16 reports associated with these missed due dates were closed as “no trouble
17 found,” but the appointment dates were missed due to improper order closeout
18 procedures. The following of proper Line Sharing methods and procedures is
19 being emphasized to all Central Office technicians. BellSouth met the retail
20 analogue comparison for this sub-metric in January 2002.

21
22 Customer Trouble Report Rate / UNE ISDN / Dispatch (B.3.2.6.1)

23 (January/February/March)

1 163. Both the CLECs and BellSouth retail had 97% to 98% trouble free service
2 for all in service lines in this sub-metric in January, February and March 2002.
3 Even though the measurement indicated that BellSouth did not meet the retail
4 analogue, both BellSouth and the CLECs were being provided a high level of
5 service for this sub-metric. BellSouth is developing an action plan to improve
6 circuit testing and turn-up documentation. ISDN test jacks have been installed
7 in each central office to facilitate improved testing and turn-up control
8 procedures.

9
10 Customer Trouble Report Rate / Line Sharing / Non-Dispatch (B.3.2.7.2)

11 (January/February)

12 164. There were a total of 67 troubles for the 1,316 in service lines for this sub-
13 metric in January and 34 troubles reported for the 1,565 lines in service in
14 February 2002. In January and February 2002, 55 of the 67 troubles (83%)
15 and 29 of the 34 troubles (85%) were closed as “no trouble found,” indicating
16 minimal impact on the customer. Even though the measurement indicated that
17 BellSouth did not meet the retail analogue, both BellSouth and the CLECs
18 were being provided a high level of service for this sub-metric. BellSouth met
19 the retail analogue comparison for this sub-metric in March 2002.

20
21 Maintenance Average Duration / UNE ISDN / Non-Dispatch (B.3.3.6.2)

22 (January/February/March)

23 165. In January 2002, the average maintenance duration for CLEC orders was
24 7.27 days compared to 2.60 days for the retail analogue. In February 2002, the

1 average maintenance duration for CLEC orders was reduced to 5.67 days
2 compared to 2.45 days for the retail analogue. In March the average duration
3 for CLEC orders was further reduced to 3.88 days compared to 2.60 days for
4 the retail analogue. The average maintenance interval for CLEC orders has
5 been reduced by over 50% over the three-month period. BellSouth is tracking
6 this item on a daily basis to identify opportunities for further improvement
7

8 Maintenance Average Duration / Line Sharing / Non-Dispatch (B.3.3.7.2)
9 (March)

10 166. The average maintenance interval for CLEC orders in this sub-metric was
11 17.86 hours in March compared to 4.28 hours for the retail analogue. Of the
12 37 total trouble reports for the orders associated with this sub-metric, 28
13 (76%) were closed as “no trouble found.” Ten of the trouble reports that were
14 closed as “no trouble found,” had abnormally long completion intervals due to
15 improper order closeout procedures. The following of proper Line Sharing
16 methods and procedures is being emphasized to all Central Office technicians.
17 BellSouth met the retail analogue comparison for this sub-metric in January
18 and February 2002.
19

20 % Repeat Troubles within 30 Days / Line Sharing / Non-Dispatch (B.3.4.7.2)
21 (January/February/March)

22 167. Of the 67 total trouble reports for this sub-metric in January 2002, 19
23 reports were repeat reports. All of the 19 repeat troubles were reported by the
24 same CLEC and 17 of the 19 repeat reports were closed as “no trouble found.”

1 There were 11 repeat reports for February 2002 of the 34 total reports. All 11
2 of the repeat reports were closed as “no trouble found.” Of the 37 total
3 trouble reports for March, 12 were repeat reports. Nine of these twelve repeat
4 reports were closed as “no trouble found.”

5
6 Out of Service > 24 Hours / UNE ISDN / Non-dispatch (B.3.5.6.2)

7 (January/February)

8 168. Of the 44 “out-of-service” trouble reports for this sub-metric in January
9 2002, only 3 repair orders were out longer than 24 hours. Only 1 of the 41
10 repair orders in February was out of service longer than 24 hours. No patterns
11 or systemic maintenance issues were identified for any of the missed orders.
12 BellSouth met the retail analogue comparison for this sub-metric in March
13 2002.

14
15 SL1/SL2/Digital Loop Group

16
17 Provisioning Measures

18 169. During the three month period, January through March 2002, BellSouth
19 met the benchmarks/retail analogues for 245 of the 315 SL1/SL2/Digital Loop
20 group provisioning sub-metrics having CLEC activity over that period.

21
22 170. The SL1/SL2/Digital Loop group provisioning sub-metrics that did not
23 meet the fixed critical value comparison requirements for January, February
24 and/or March 2002 are as follows:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Order Completion Interval (OCI)

171. OCI is adversely affected by LSRs for which CLECs request intervals beyond the offered interval. When a CLEC requests an interval beyond the available interval offered by BellSouth, an “L” code should be entered on the Service Order generated by BellSouth. Such “L” coded orders are excluded from the OCI metrics.

Order Completion Interval / 2w Analog Loop Design / < 10 Circuits / Dispatch (B.2.1.8.1.1) (January/February/March)

172. There were a total of 235 orders completed for this sub-metric in January, 365 orders completed in February and 298 orders completed in March 2002. The primary factor for the misses in this sub-metric is that the standard installation interval for this product is 4 business days. Even though the committed dates to the customer are generally being met, the intervals for orders in this sub-metric are longer than for the retail analogue product. BellSouth continues to work to lower the interval for this sub-metric to meet the “3 calendar day” interval ordered for the POTS type retail analogue services in Florida.

Order Completion Interval / 2w Analog Loop Non-Design / < 10 Circuits / Dispatch (B.2.1.9.1.1) (January/February/March)

173. The January, February and March 2002 misses were caused in large part due to the 4-day standard interval for orders in this sub-metric as compared to

1 the 3-day interval required for the retail analogue. BellSouth continues to
2 work to lower the interval for this sub-metric to meet the “3 calendar day”
3 interval ordered for the POTS type retail analogue services in Florida.

4
5 Order Completion Interval / 2w Analog Loop Non-Design / < 10 Circuits /
6 Dispatch In (B.2.1.9.1.4) (February/March)

7 174. There were only five orders for this sub-metric in February and fifteen
8 orders in March 2002. The small universe of orders for this sub-metric does
9 not provide a statistically conclusive comparison to the retail analogue.
10 BellSouth met the retail analogue comparison for this sub-metric in January
11 2002.

12
13 Order Completion Interval / 2w Analog Loop w/LNP Design / < 10 Circuits /
14 Dispatch (B.2.1.12.1.1) (January/February/March)

15 175. There were a total of 182 orders that completed for this sub-metric in
16 January, 172 orders that completed in February and 125 orders that completed
17 in March 2002. A detailed analysis indicated a significant number of orders
18 with customer requested extended intervals were not “L coded” and should
19 have been excluded from the measurement. BellSouth continues to work to
20 lower the interval for this sub-metric to meet the “3 day” interval ordered for
21 the POTS type retail analogue services in Florida. The current standard
22 interval for orders in this sub-metric is four business days as compared to the
23 three-calendar day interval for the retail analogue.

24

1 Order Completion Interval / 2w Analog Loop w/LNP Non-Design / < 10 Circuits
2 / Dispatch (B.2.1.13.1.1) (January/February/March)

3 176. There were a total of 269 orders that completed for this sub-metric in
4 January, 270 orders that completed in February and 566 orders that completed
5 in March 2002. BellSouth continues to work to lower the interval for this sub-
6 metric to meet the “3 calendar day” interval ordered for the POTS type retail
7 analogue services in Florida. The current standard interval for this sub-metric
8 is four business days as compared to the three-day interval for the retail
9 analogue.

10
11 Order Completion Interval / 2w Analog Loop w/LNP Non-Design / < 10 Circuits
12 / Dispatch In (B.2.1.13.1.4) (January/February/March)

13 177. There were a total of 248 orders completed for this sub-metric in January,
14 360 orders that completed in February and 491 orders that completed in
15 March 2002. BellSouth continues to work to lower the interval for this sub-
16 metric to meet the “3 calendar day” interval ordered for the POTS type retail
17 analogue services in Florida. The current standard interval for this sub-metric
18 is four business days as compared to the three-day interval for the retail
19 analogue.

20
21 Order Completion Interval / Digital Loop < DS1 / < 10 Circuits / Dispatch
22 (B.2.1.18.1.1) (January/February/March)

23 178. There were a total of 353 orders that completed for this sub-metric in
24 January, 366 orders that completed in February and 391 orders that completed

1 in March 2002. BellSouth continues to work to lower the interval for this sub-
2 metric to meet the retail analogue services in Florida. In January and
3 February 2002, 323 of the 353 orders and 330 of the 366 orders, respectively,
4 in this sub-metric were completed on or before the committed due date. Only
5 17 of the January orders, 14 of the February orders and 13 of the March orders
6 missed the committed installation interval due to company reasons. As stated
7 in the Varner Performance Measurements' Affidavit, BellSouth is currently
8 investigating the retail analogue makeup for this sub-metric.

9
10 179. The remainder of the provisioning measures that did not meet the retail
11 analogue for provisioning is as follows:

12
13 Held Orders / 2w Analog Loop w/LNP Non-Design / >= 10 Circuits / Facility
14 (B.2.3.13.2.1) (February)

15 180. There was only one order for this sub-metric in February 2001. The small
16 universe size for this sub-metric does not provide a statistically conclusive
17 comparison to the retail analogue. BellSouth met the retail analogue
18 comparison for this sub-metric in January and March 2002.

19
20 % Jeopardies / 2w Analog Loop Design (B.2.5.8) (January/February/March)

21 181. In January 2002, there were a total of 43 jeopardies issued for the 262
22 orders that were scheduled for this sub-metric. All but 10 of the jeopardies
23 were resolved prior to the due date and the orders worked as scheduled. Of
24 the 10 January jeopardies, only 2 caused missed installation appointments for

1 company reasons. In February 2002, there were a total of 67 jeopardies issued
2 for the 486 orders that were scheduled for this sub-metric. Of the 67 February
3 jeopardies, 42 were resolved prior to the due dates and the orders completed
4 on time, and the remaining 15 jeopardy orders were held for customer reasons.
5 In March 2002, there were a total of 61 jeopardies issued for the 405 orders
6 that were scheduled for this sub-metric. All but 8 of the jeopardies were
7 resolved prior to the due date and the orders worked as scheduled. Of the 8
8 unresolved jeopardies, all 8 orders were held due to customer reasons.

9
10 % Jeopardies / 2w Analog Loop Non-Design (B.2.5.9) (January/February/March)

11 182. In January 2002, there were a total of 5 jeopardies issued for the 109
12 orders that were scheduled for this sub-metric. Of the 5 January jeopardies,
13 only 1 resulted in a missed installation appointment due to the requirement to
14 add new conduit into the central office building. In February 2002, there were
15 a total of 61 jeopardies issued for the 745 orders scheduled. All but 6 of the
16 February jeopardies were resolved prior to the due date and the orders were
17 completed as scheduled. Four of the six missed February appointments were
18 due to customer reasons, and only two were due to company reasons. In
19 March 2002, there were a total of 103 jeopardies issued for the 912 orders that
20 were scheduled for this sub-metric. Of the 103 total March jeopardies, 90
21 were resolved prior to the due dates and the orders completed on time. All 13
22 of the orders with missed due dates were held due to customer reasons.

1 % Jeopardies / 2w Analog Loop w/LNP Design (B.2.5.12)

2 (January/February/March)

3 183. In January 2002, there were a total of 27 jeopardies issued for the 240
4 orders that were scheduled for this sub-metric. Of the 27 January jeopardies,
5 26 were resolved prior to the scheduled due date. The other jeopardy was
6 associated with an order that was subsequently cancelled and should not have
7 been included in this measurement. In February 2002, there were a total of 42
8 jeopardies issued for the 379 orders that were scheduled for this sub-metric.
9 All but 6 of the February jeopardies were resolved prior to the due dates, and
10 the orders were completed on time. All six of the jeopardies causing missed
11 appointments in February were due to customer reasons. In March 2002,
12 there were a total of 21 jeopardies issued for the 273 orders that were
13 scheduled for this sub-metric. Of the 21 total March jeopardies, 18 were
14 resolved prior to the due dates and the orders completed on time. All 3 of the
15 orders with missed due dates were held due to customer reasons.

16
17 % Jeopardies / 2w Analog Loop w/LNP Non-Design (B.2.5.13)

18 (January/February/March)

19 184. **In January 2002**, there were a total of 51 jeopardies issued for the 1,030
20 orders that were scheduled for this sub-metric. Of the 51 January jeopardies
21 for this sub-metric, 46 were resolved prior to the due dates and the orders
22 completed on time. Only 2 of the missed appointments were missed for
23 company reasons. In February 2002, there were a total of 69 jeopardies issued
24 for the 1,036 scheduled orders. Only 4 of the 69 February jeopardies resulted

1 in missed installation appointments, all of which were missed due to customer
2 reasons. In March 2002, there were a total of 87 jeopardies issued for the
3 1,694 orders that were scheduled for this sub-metric. Of the 87 total March
4 jeopardies, 78 were resolved prior to the due dates and the orders completed
5 on time. All of the orders with missed due dates were held due to customer
6 reasons.

7
8 % Jeopardies / Digital Loop >= DS1 (B.2.5.19) (January/February/March)

9 185. There were a total of 51 jeopardies issued for the 63 installation
10 appointments that were scheduled for this sub-metric in January, 91 jeopardies
11 for the 177 appointments scheduled for February and 69 jeopardies issued for
12 the 139 orders scheduled for March 2002. While the data indicates that
13 BellSouth placed a higher percentage of CLEC orders in jeopardy status, all
14 but 2 of the January jeopardies were resolved prior to the due dates, and the
15 orders were worked on time. Of the 91 February jeopardies, all but 14
16 jeopardies were resolved prior to the due dates, and the orders were worked on
17 time. All 14 of the February jeopardies and all 9 of the March jeopardies
18 causing missed appointments were missed due to customer reasons.

19
20 % Jeopardy Notice >= 48 Hours / 2w Analog Loop Non-Design / Electronic

21 (B.2.10.9) (February)

22 186. BellSouth met the 48-hour benchmark for 47 of the 50 jeopardy notices
23 for this sub-metric in February 2002. The 95% benchmark required that 48 of
24 the 50 notices meet the 48-hour interval. As was discussed in the Introduction

1 section, the coding for this measurement was undergoing modification in
2 January 2002. BellSouth met the benchmark for this sub-metric in March
3 2002.

4
5 % Jeopardy Notice >= 48 Hours / Digital Loop < DS1 / Electronic (B.2.10.18)
6 (March)

7 187. BellSouth met the 48-hour benchmark for 48 of the 52 jeopardy notices
8 for this sub-metric in March 2002. The 95% benchmark required that 50 of
9 the 52 notices meet the 48-hour interval. As was discussed in the Introduction
10 section, the coding for this measurement was undergoing modification in
11 January 2002. BellSouth met the benchmark for this sub-metric in February
12 2002.

13
14 % Missed Installation Appointments / 2w Analog Loop Non-Design / >= 10
15 Circuits / Dispatch (B.2.18.9.2.1) (February)

16 188. BellSouth completed 13 of the 16 installation orders as scheduled for this
17 sub-metric in February 2002. There were no patterns or systemic installation
18 issues identified for the 3 missed orders. BellSouth met the retail analogue
19 comparison for this sub-metric in January and March 2002.

20
21 % Missed Installation Appointments / 2w Analog Loop w/LNP Non-Design / <
22 10 Circuits / Dispatch In (B.2.18.13.1.4) (February/March)

23 189. BellSouth completed 584 of the 587 (99.5%) installation orders as
24 scheduled for this sub-metric in February and completed 814 of the 819

1 (99.4%) appointments as scheduled in March 2002. There were no patterns or
2 systemic installation issues identified for any of the missed orders. BellSouth
3 met the retail analogue comparison for this sub-metric in January 2002.

4
5 % Missed Installation Appointments / Digital Loop \geq DS1 / $<$ 10 Circuits /
6 Dispatch (B.2.18.19.1.1) (January/February)

7 190. BellSouth completed 246 of the 273 installation appointments as
8 scheduled for this sub-metric in January 2002 and 348 of the 363
9 appointments as scheduled for February 2002. The majority of the January
10 and February missed appointments were due to lack of available company
11 facilities. The remainder of the missed appointments was due to various
12 scheduling and prioritization problems. BellSouth is refocusing its efforts on
13 this area to improve its performance on these orders. BellSouth met the retail
14 analogue comparison for this sub-metric in March 2002.

15
16 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Design / $<$ 10 Circuits /
17 Dispatch (B.2.19.8.1.1) (January/February/March)

18 191. There were 28 troubles reported for this sub-metric in January for the 324
19 orders completed in the prior 30 days, 38 troubles reported in February for the
20 364 orders completed in the prior 30 days and 46 troubles reported in March
21 2002 for the 459 orders completed in the prior 30 days. The majority of the
22 troubles were due to defective cable facilities and serving wire. Of the 38
23 troubles reported for February and 46 reports for March, 24% and 26%,
24 respectively, were closed as "no trouble found." Of the 28 total trouble

1 reports for January, 38 total reports for February and 46 trouble reports for
2 March, 79%, 84% and 93%, respectively, were reported by the same CLEC.
3 BellSouth has begun a trial with that CLEC to improve the provisioning
4 process on conversion orders. An analysis of the remainder of the troubles
5 revealed no specific patterns or trends.

6
7 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Non-Design / < 10
8 Circuits / Dispatch (B.2.19.9.1.1) (January/February/March)

9 192. There were a total of 56 troubles reported for this sub-metric for the 679
10 orders that completed in the 30 days prior to January, 57 troubles reported for
11 the 759 orders that completed in the 30 days prior to February and 59 troubles
12 reported for the 762 orders completed in the 30 days prior to March 2002.
13 Most of the reported troubles for this sub-metric were due to defective cable
14 facilities. Of the 56 total trouble reports for January, 57 total reports for
15 February and 59 total reports for March, 45%, 49% and 53%, respectively,
16 were reported by the same CLEC. BellSouth has begun a trial with that
17 CLEC to improve the provisioning process on conversion orders.

18
19 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Non-Design / < 10
20 Circuits / Dispatch In (B.2.19.9.1.4) (March)

21 193. There were only six orders for this sub-metric in March 2002. The small
22 universe of orders for this sub-metric does not provide a statistically
23 conclusive comparison to the retail analogue. BellSouth met the retail
24 analogue comparison for this sub-metric in January and February 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

% Provisioning Troubles w/i 30 Days / 2w Analog Loop Non-Design / >= 10
Circuits / Dispatch (B.2.19.9.2.1) (March)

194. There were only four troubles reported for the CLEC aggregate for this sub-metric in March 2002. This small universe does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in January and February 2002.

% Provisioning Troubles w/i 30 Days / 2w Analog Loop w/LNP Design / < 10
Circuits / Dispatch (B.2.19.12.1.1) (January/February/March)

195. There were a total of 34 troubles reported for this sub-metric for the 444 orders that completed in the 30 days prior to January, 31 troubles reported for the 363 orders that completed in the 30 days prior to February and 31 troubles reported for the 386 orders completed in the 30 days prior to March 2002. Of the 34 January trouble reports, 12 (35%) were closed as “no trouble found.” Of the 31 February trouble reports, 5 (16%) were closed as “no trouble found.” Of the 31 March trouble reports, 13 (42%) were closed as “no trouble found.” The remainder of the troubles was generally due to facility and equipment wiring problems. BellSouth is currently investigating the causes for the level of facility problems for this sub-metric.

% Provisioning Troubles w/i 30 Days / 2w Analog Loop w/LNP Non-Design / < 10 Circuits / Dispatch (B.2.19.13.1.1) (January)

1 196. There were a total of 59 troubles reported for this sub-metric for the 861
2 orders that completed in the 30 days prior to January 2002. Of the 59 total
3 January trouble reports for this sub-metric, 69% were reported by one CLEC.
4 No other trends or systemic installation issues were identified for this sub-
5 metric. BellSouth met the retail analogue comparison for this sub-metric in
6 February and March 2002.

7
8 % Provisioning Troubles w/i 30 Days / 2w Analog Loop w/LNP Non-Design / >=
9 10 Circuits / Dispatch (B.2.19.13.2.1) (February/March)

10 197. There were a total of 9 troubles reported for this sub-metric for the 45
11 orders that completed in the 30 days prior to February and 4 troubles reported
12 for the 26 orders that completed in the 30 days prior to March 2002. No
13 trends or systemic installation issues were identified for the troubles reported
14 for this sub-metric. BellSouth met the retail analogue comparison for this
15 sub-metric in January 2002.

16
17 % Provisioning Troubles w/i 30 Days / 2w Analog Loop w/LNP Non-Design / >=
18 10 Circuits / Dispatch In (B.2.19.13.2.4) (February/March)

19 198. There were a total of 3 troubles reported for this sub-metric for the 28
20 orders that completed in the 30 days prior to February and 1 trouble reported
21 for the 15 orders that completed in the 30 days prior to March 2002. No
22 trends or systemic installation issues were identified for the troubles reported
23 for this sub-metric. BellSouth met the retail analogue comparison for this
24 sub-metric in January 2002.

1
2 % Provisioning Troubles w/i 30 Days / Digital Loops >= DS1 / < 10 Circuits /
3 Dispatch (B.2.19.19.1.1) (January/February/March)

4 199. There were a total of 18 troubles reported for this sub-metric for the 409
5 orders that completed in the 30 days prior to January, 18 troubles reported for
6 the 273 orders that completed in the 30 days prior to February and 19 troubles
7 reported for the 363 orders that completed in the 30 days prior to March 2002.
8 In January, February and March 2002, 33%, 5% and 32%, respectively, of the
9 trouble reports in this sub-metric were closed as “no trouble found” indicating
10 minimal impact on the end user. BellSouth is currently investigating the
11 caused for the misses in this sub-metric.

12
13 Average Completion Notice Interval / 2w Analog Loop Design / < 10 Circuits /
14 Dispatch (B.2.21.8.1.1) (January/February/March)

15 Average Completion Notice Interval / 2w Analog Loop w/LNP Design / < 10
16 Circuits / Dispatch (B.2.21.12.1.1) (January/February/March)

17 Average Completion Notice Interval / 2w Analog Loop w/LNP Design / >= 10
18 Circuits / Dispatch (B.2.21.12.2.1) (January)

19 Average Completion Notice Interval / Digital Loop < DS1 / < 10 Circuits /
20 Dispatch (B.2.21.18.1.1) (March)

21 200. The root cause analysis of these measures indicated that the only
22 differences between the performance between BellSouth retail and CLECs are
23 the mismatches found when the orders are compared with the original LSRs.
24 The start of the completion interval is the point at which the technician

1 completes the order, and the interval ends when the completion notice is sent.
2 Any change to a name, number of items, etc., occurring during the
3 provisioning process will generate inconsistencies with the original LSRs that
4 must be resolved before a final completion notice can be sent. Any time to
5 resolve these inconsistencies with the original LSRs is included in the
6 average. Because of numerous CLEC changes and order updates, mismatches
7 on CLECs orders exceed those for BellSouth retail orders. Combining this
8 with the smaller base for the CLECs' measurement raises the average, which
9 results in a miss. Specific Service Representatives within the Work
10 Management Centers have been assigned to resolve any completion issues that
11 are required. Providing specific training and dedicating personnel to this task
12 should reduce the difference between the CLEC and retail analogue results.

13
14 **Maintenance & Repair Measures**

15 201. BellSouth met the benchmarks/retail analogues for 53 of the 60
16 SL1/SL2/Digital group maintenance and repair sub-metrics having CLEC
17 activity over the three month period, January through March 2002.

18
19 202. The SL1/SL2/Digital Loop group maintenance and repair sub-metrics that
20 did not meet the fixed critical value comparison requirements for January,
21 February and/or March 2002 are as follows:

22
23 % Missed Repair Appointments / 2W Analog Loop Non-Design / Dispatch

24 (B.3.1.9.1) (January)

1 203. BellSouth completed 903 of the 1,028 repair appointments for this sub-
2 metric as scheduled in January 2002. 96% of the January troubles were
3 caused by defective cable or network terminating wire facilities, necessitating
4 an additional technician to be dispatched. BellSouth met the retail analogue
5 comparison for this sub-metric in February and March 2002.

6
7 % Missed Repair Appointments / 2W Analog Loop Non-Design / Non-Dispatch
8 (B.3.1.9.2) (January/February/March)

9 204. BellSouth completed 47 of the 49 repair appointments for this sub-metric
10 as scheduled in January, 61 of the 63 appointments scheduled for February
11 and 50 of the 55 repair appointments as scheduled for March 2002. Both of
12 the orders shown missed for February were vendor meet requests and should
13 have been excluded from this measure. All 5 of the missed dates in March
14 were due to one C.O. equipment failure and affected one customer. Repair
15 Service Attendants are being re-covered on proper order closeout procedures.
16 There were no distinct patterns or systemic maintenance problems identified
17 for any of the remainder of the missed appointments in these three months.

18
19 Out of Service > 24 Hours / 2W Analog Loop Non-Design / Dispatch (B.3.5.9.1)
20 (February)

21 205. Of the 36 total “service affecting” trouble reports for this sub-metric in
22 February, 9 werē out of service longer than 24 hours. No patterns or systemic
23 maintenance issued were identified for any of these nine reports. BellSouth

1 met the retail analogue comparison for this sub-metric in January and March
2 2002.

3
4 Out of Service > 24 Hours / 2W Analog Loop Non-Design / Non-Dispatch
5 (B.3.5.9.2) (January/March)

6 206. There were only 4 “out of service” trouble reports for this sub-metric in
7 January and 4 reports for March 2002. The small universe of orders for this
8 sub-metric does not provide a statistically conclusive comparison to the retail
9 analogue. BellSouth met the retail analogue comparison for this sub-metric in
10 February 2002.

11
12 Coordinated Customer Conversions – Hot Cuts

13 207. These measures track whether BellSouth begins the cutover of unbundled
14 loops on coordinated and/or time specific orders at the CLEC requested start
15 times. During the January through March 2002 period, BellSouth completed
16 4,440 coordinated conversion orders (17,614 unbundled loops). The
17 benchmark for these measures is to have at least 95% of conversions begin
18 within 15 minutes of the scheduled times. In the January through March
19 period, BellSouth exceeded all these benchmarks with 4,422 (99.6%) of the
20 4,440 orders, (17,576 of the 17,614 loops) meeting the 15-minute benchmark
21 interval. Only 0.9% of the lines converted experienced trouble within 7 days
22 of the cutovers.

23

1 **E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT**

2
3 208. BellSouth met the benchmark/analogue requirements for 43 of the 49
4 measurements in Checklist Item 5 that had CLEC activity in January,
5 February and March 2002.

6
7 **Provisioning Measures**

8 209. Over the three month period, BellSouth met all 9 of the 9 sub-metrics for
9 “Held Orders”, all 3 of the 3 sub-metrics for “Missed Installation
10 Appointments”, and all 3 of the 3 sub-metrics for “% Provisioning Troubles
11 within 30 Days.” The provisioning sub-metrics that did not meet the
12 benchmarks/retail analogues over this period were:

13
14 **Order Completion Interval / Local Interoffice Transport / < 10 Circuits / Dispatch**
15 **(B.2.1.2.1.1) (January/February/March)**

16 210. In January 2002, there were 17 orders for the sub-metric with an average
17 completion interval of 25 days. In February 2002, there were 21 orders for the
18 sub-metric with an average completion interval of 21 days. There were 29
19 orders for this sub-metric in March 2002, with an average completion interval
20 of 20 days. All the orders in January 2002, and 19 of the 21 orders for
21 February and 25 of the 29 orders for March 2002, completed within the
22 standard order interval or met the due date requested by the customer, if later
23 than the standard interval due date. Of the 21 orders for February 2002, 11
24 had extended due date intervals at the customer request, but were not given an

1 “L” code. These orders should have been excluded from the measurement for
2 February. Proper coding of these orders would have produced an average
3 CLEC OCI for this sub-metric of 14.45 days, which is below the average OCI
4 for the retail analogue for the month.

5
6 **Maintenance and Repair**

7 211. During January through March 2002, BellSouth met 5 of the 6 sub-metrics
8 for “Missed Repair Appointments”, met all 6 of the 6 sub-metrics for
9 “Customer Trouble Report Rate”, met 5 of the 6 sub-metrics for “Maintenance
10 Average Duration”, met all 6 of the 6 sub-metrics for “% Repeat Troubles
11 within 30 Days”, and met 5 of the 6 sub-metrics for “Out of Service > 24
12 Hours.” For the three sub-metrics that did not meet the retail analogue
13 comparisons, the small universe sizes of orders would not provide statistically
14 conclusive comparisons to the retail analogue. The maintenance and repair
15 sub-metrics that did not meet the benchmarks/retail analogues over this period
16 were:

17
18 **Missed Repair Appointments / Local Interoffice Transport / Dispatch (B.3.1.2.1)**
19 **(March)**

20 212. There was only one order for this sub-metric in March 2002. The small
21 universe of orders for the month does not provide a statistically conclusive
22 comparison to the retail analogue. BellSouth met the retail analogue
23 comparison for this sub-metric in January and February 2002.

1 Maintenance Average Duration / Local Interoffice Transport / Dispatch

2 (B.3.3.2.1) (March)

3 213. There was only one order for this sub-metric in March 2002. The small
4 universe of orders for the month does not provide a statistically conclusive
5 comparison to the retail analogue. BellSouth met the retail analogue
6 comparison for this sub-metric in January and February 2002.

7
8 Out of Service > 24 Hours / Local Interoffice Transport / Dispatch (B.3.5.2.1)

9 (March)

10 214. There was only one order for this sub-metric in March 2002. The small
11 universe of orders for the month does not provide a statistically conclusive
12 comparison to the retail analogue. BellSouth met the retail analogue
13 comparison for this sub-metric in January and February 2002.

14
15 **F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING**

16
17 215. The data in these measures indicate that there was no CLEC activity for
18 any of the measurements in Checklist Item 6 for January, February and March
19 2002.

20
21 **G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES**

22
23 216. BellSouth's performance measurement results demonstrate that CLECs in
24 Florida receive high quality access to 911 and E911 services. The equipment
25 used to provide access to these services cannot distinguish between BellSouth

1 retail and CLEC customers, therefore all of the measures for this item are
2 classified as “parity-by-design”. BellSouth provides three measures that
3 provide performance information for 911/E911. Item F.8.1 in the MSS data
4 shows the mean interval processing time to update all CLEC resale and
5 BellSouth retail records including processing check against the Automatic
6 Location Identification database. The mean interval has averaged 1.55 hours
7 for over 3,400 orders for the period of January through March 2002. Item
8 F.8.2 in the MSS data shows the percent of E911 telephone number record
9 updates for all CLEC resale and BellSouth retail records processed
10 successfully for E911. BellSouth has averaged over 96% accuracy for the
11 2,158,795 updates in the months of January through March 2002. The
12 timeliness measure, item F.8.3, monitors the percentage of batch orders for
13 E911 database updates to CLEC resale and BellSouth retail records processed
14 within a 24-hour period. For the months of January through March 2002,
15 BellSouth processed 100% of all orders submitted within the 24-hour time
16 frame.

17
18 **H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR**
19 **SERVICES**

20
21 217. BellSouth’s performance measurement results demonstrate that CLECs in
22 Florida receive high quality access to Directory Assistance and Operator

1 Services. The equipment used to provide access to these services cannot
2 distinguish between BellSouth retail and CLEC customers, therefore all of the
3 measures for this item are classified as “parity-by-design”. BellSouth
4 provides two separate measures that provide performance information for
5 Directory Assistance and Operator Services speed of answer. As an example,
6 item F.6.1 shows that the average speed of answer for Operator Services was
7 4.94 seconds. Item F.6.2 shows that almost 97% of all CLEC and BellSouth
8 customer calls were answered within 10 seconds. Similarly, item F.7.1 shows
9 that the average speed of answer for Directory Assistance was 4.92 seconds
10 with over 95% of all calls answered in 10 seconds shown in item F.7.2

11
12 **I. CHECKLIST ITEM 10 – ACCESS TO DATABASES AND**
13 **ASSOCIATED SIGNALING**

14
15 218. BellSouth provides three separate measures that provide performance
16 information for average update interval (F.13.1), update accuracy (F.13.2) and
17 NXXs loaded by LERG effective date (F.13.3). The equipment used to
18 provide access to the update interval cannot distinguish between BellSouth
19 retail and CLEC customers; therefore all of the sub-metrics for this item are
20 classified as “parity-by-design”. For January through March 2002, the Line
21 Information Data Base (“LIBD”) was updated on an average of 3.69 hours,
22 Directory Listing database in 0.09 hours and Directory Assistance in 3.90
23 hours. The update accuracy measure (F.13.2) met the 95% benchmark for 9
24 of the 9 sub-metrics during January through March 2002. In January through

1 March 2002, BellSouth met the benchmark of 100% (F.13.3) of the NXXs
2 loaded by LERG effective date for 2 of the 3 months. The sub-metric that did
3 not meet the benchmark for March 2002 was as follows:

4
5 % NXXs / LRNs Loaded by LERG Effective Date / Region (F.3.3) (March)

6 219. BellSouth met the effective date for loading 29 of the 30 NXXs
7 implemented during March 2002. This is regional measure. BellSouth met
8 the LERG effective dates for all NXXs loaded for Florida operations in March
9 2002. BellSouth met the benchmark for this sub-metric in January and
10 February 2002.

11
12 **J. CHECKLIST ITEM 11 – NUMBER PORTABILITY**

13
14 220. BellSouth met the benchmarks/retail analogues for 73 of the 77 number
15 portability sub-metrics having CLEC activity during January through March
16 2002. For the non-dispatched CLEC LNP standalone orders, the average
17 order completion interval for the three months was 0.65 days compared to
18 0.86 days for the BellSouth retail analogue. There were no held orders for any
19 of the items in this checklist for the January through March period. There
20 were no troubles reported within 30 days of the completion of any of the INP
21 or LNP orders over the three-month period.

22
23 221. BellSouth missed the retail analogue comparison for missed installation
24 appointments for non-dispatched LNP standalone orders in each month,

1 January through March 2002. However, BellSouth completed 10,875 (99.8%)
2 of the 10,892 orders as scheduled for this measure for the three months. The
3 sub-metrics that did not meet the benchmarks/retail analogues for January,
4 February and/or March were as follows:

5
6 % Missed Installation Appointments / LNP (Standalone) / < 10 Circuits / Non-
7 Dispatch (B.2.18.17.1.2) (January/February/March)

8 222. BellSouth missed only 5 of the 4,076 installation appointments scheduled
9 for this sub-metric in January, missed only 9 of the 3,475 appointments
10 scheduled for February and missed only 3 of the 3,341 appointments
11 scheduled for March 2002. BellSouth met over 99.7% of the scheduled
12 appointments for both retail and the CLECs in this sub-metric for January and
13 February and over 99.9% in March. When BellSouth provisions high quality
14 service coupled with very large universe sizes, it can cause an apparent out of
15 equity condition from a quantitative viewpoint. In these cases, there is very
16 little variation and the universe size is so large that the Z-test becomes overly
17 sensitive to any difference. In other words, the statistical test shows that the
18 measurement does not meet the fixed critical value when compared with the
19 retail analogue, but BellSouth's actual performance for both CLECs and its
20 own retail operations is at a very high level – in this case over 99%. From a
21 practical point of view, the CLECs' ability to compete has not been hindered
22 even though the statistical results may technically show that BellSouth failed
23 to meet the benchmark/analogue.

24

1 Disconnect Timeliness / LNP / < 10 Circuits (B.2.31)

2 223. The Disconnect Timeliness measure is supposed to track the time it takes
3 to disconnect a number in the central office switch after the message has been
4 received from the Local Number Portability (LNP) Gateway that it is ready.
5 However, this measurement does not track the relevant time to perform this
6 function.

7
8 224. On a great majority of LNP orders, BellSouth creates what is referred to as
9 a “trigger” in conjunction with the order. This trigger gives the end user
10 customer the ability to make and receive calls from other customers who are
11 served by the customer’s host switch at the time of the LNP activation. This
12 ability is not dependent upon BellSouth working a disconnect order in the
13 central office switch. In other words, when a trigger is involved, an end user
14 customer can receive calls from other customers served by the same host
15 switch before the disconnect order is ever worked.

16
17 225. As it currently exists, Performance Measure P-13 (Disconnect Timeliness)
18 does not recognize the importance of triggers and their effect on the LNP
19 process. Rather, the current measure calculates the end time of the LNP
20 activity as the processing of the actual disconnect order in the host switch,
21 even though, from a customer’s perspective, this activity is totally
22 meaningless on most LNP orders. It is the activation of the LNP and the
23 routing function accomplished by the LSMS that ultimately determines
24 whether the end user is back in full service and is able to make and receive

1 calls when a trigger is used in porting a telephone number. So, while
 2 BellSouth may be missing this measure, the actual impact on CLECs and their
 3 end users, for a great majority of the orders is minimal, or nonexistent. The
 4 Georgia PSC is currently evaluating a change in this measure that more
 5 accurately reflects the LNP process and its impacts on end users.

6
 7 226. The Florida results for January through March 2002 for the existing
 8 Disconnect Timeliness measure along with the % Trigger Orders prior to the
 9 due date, % Out of Service less than 60 minutes and % Disconnect Timeliness
 10 for Non-Trigger Orders are as follows:

11

<u>Name of Measure</u>	<u>Jan Results</u>	<u>Feb Results</u>	<u>Mar Results</u>
LNP Disconnect Timeliness	21.34% <= 15 min	29.37% <= 15 min	30.43% <= 15 min
% LNP Trigger Prior to Due Date	98.46%	99.19%	99.42%
% Out of Service < 60 Minutes	100.00%	100.00%	100.00%
% Disconnect Timeliness – Non Trigger	NA	NA	81.07%

12
 13
 14 **K. CHECKLIST ITEM 14 – RESALE**

15
 16 227. BellSouth has met or exceeded the benchmarks/analogues for 84% of the
 17 219 Resale metrics for the month of January, for 86% of the 213 metrics in

1 February and for 84% of the 220 metrics in March 2002. The details are
2 delineated in Attachment 1J, Items A.1.1.1 through A.4.2.

3
4 228. During the three-month period, January through March 2002, there were
5 199 Resale sub-metrics that had data for all three months and were compared
6 to benchmarks or retail analogues. Of those 199 sub-metrics, 171 (86%) of
7 the sub-metrics met the relevant criteria for at least two of the three months.

8
9 **Resale Ordering Measures**

10
11 **Reject Interval**

12 229. During the January through March 2002 period, 71,417 CLEC LSRs were
13 rejected due to errors. About two thirds of these LSRs were processed on a
14 fully electronic basis, about five percent were handled on a manual basis, and
15 the remainder (28%) were partially electronic (received electronically but
16 require intervention by a BellSouth service representative). The reject interval
17 sub-metrics measure the elapsed time between BellSouth's receipt of each
18 LSR and the time the rejected LSR is sent back to the CLEC. Of the 71,417
19 total rejected LSRs over the three-month period, 64,370 (90%) met the
20 applicable benchmark interval for return to the CLECs.

21
22 230. The benchmark for electronic rejects is 97% within 1 hour. In January
23 2002, there were a total of 23,390 resale LSRs rejected, with 94% meeting the
24 relevant benchmark. Of the 23,390 rejected LSRs, 65% were processed

1 electronically with 95% of them meeting the 1-hour benchmark interval. In
2 February 2002, 26,200 resale LSRs were rejected, with 87% meeting the
3 relevant benchmark or retail analogue. Of the 26,200 rejected LSRs, 71%
4 were processed electronically with 91% of them meeting the 1-hour
5 benchmark interval. In March 2002, 21,827 resale LSRs were rejected, with
6 90% meeting the relevant benchmark or retail analogue. Of the 21,827
7 rejected LSRs, 66% were processed electronically with 93% of them meeting
8 the 1-hour benchmark interval. See Attachment 1J, Items A.1.4 through A.1.8
9 for further details.

10
11 **FOC Timeliness**

12 231. During January through March 2002, 231,411 CLEC LSRs were
13 processed as firm order confirmations. About three fourths of these LSRs
14 were processed on a fully electronic basis, about 2% were handled on a
15 manual basis, and the remainder (22%) were partially electronic (received
16 electronically but require intervention by a BellSouth service representative).
17 The FOC timeliness sub-metrics measure the elapsed time between
18 BellSouth's receipt of each LSR and the time the FOC is sent back to the
19 CLEC. Of the 231,411 total FOCs returned to the CLECs over the three-
20 month period, 220,252 (95%) met the applicable benchmark interval for return
21 to the CLECs.

22
23 232. In January 2002, BellSouth issued FOCs for 81,891 resale LSRs and met
24 the relevant benchmark for 98% of them. Of the 81,891 FOCs returned,

1 64,011 were fully mechanized with 99.9% meeting the 3-hour benchmark
2 interval. In February 2002, BellSouth issued FOCs for 76,781 resale LSRs
3 and met the relevant benchmark for 93% of them. Of the 76,781 FOCs
4 returned, 57,899 were fully mechanized with 99.5% meeting the 3-hour
5 benchmark interval. In March, BellSouth issued FOCs for 72,739 resale LSRs
6 and met the relevant benchmark for 95% of them. Of the 72,739 FOCs
7 returned, 54,602 were fully mechanized with 99.5% meeting the 3-hour
8 benchmark interval. See Attachment 1J, Sections A.1.9 through A.1.13 for
9 further details.

10
11 233. The Resale Ordering sub-metrics for which BellSouth did not meet the
12 benchmarks / analogues for January, February and/or March 2002 were:

13
14 Reject Interval / Residence / Electronic (A.1.4.1) (January/February/March)

15 234. The current benchmark for this sub-metric is $\geq 97\%$ within one hour. In
16 January, 13,476 of the 14,136 total rejected LSRs met the one-hour
17 benchmark, and in February 2002, 16,013 of the 17,576 rejected LSRs in this
18 sub-metric met the benchmark interval. In March 2002, 12,603 of the 13,556
19 total rejected LSRs for this sub-metric met the 1-hour benchmark interval.
20 For those LSRs for which BellSouth did not meet the benchmark, BellSouth
21 has conducted a detailed root cause analysis of the process for electronic
22 rejects. See Checklist Item 2, UNE Reject Interval Electronic for a detail
23 explanation of the issues associated with this sub-metric.

24

1 Reject Interval / Business / Electronic (A.1.4.2) (January/February/March)

2 235. The current benchmark for this sub-metric is $\geq 97\%$ within one hour. In
3 January, 974 of the 1,019 rejected LSRs for this sub-metric met the one-hour
4 benchmark, and in February 2002, 860 of the 920 rejected LSRs met the 1-
5 hour benchmark. There were 816 LSRs rejected in this sub-metric in March
6 2002, with 765 meeting the one-hour benchmark. BellSouth is conducting a
7 detailed root cause analysis of the process for electronic ordering. This
8 analysis addresses the ordering systems (EDI, TAG, and LENS) used by the
9 CLECs and the back-end legacy applications, such as SOCS, that are accessed
10 by the ordering systems. For further information see the explanation included
11 with the electronic reject interval measurement, item A.1.4.1.

12
13 Reject Interval / Design (Specials) / Electronic (A.1.4.3) (January)

14 236. There was only one LSR rejected for this sub-metric in January 2002. The
15 small universe of orders for this sub-metric does not provide a conclusive
16 benchmark comparison. There was no CLEC activity for this sub-metric in
17 either February or March 2002.

18
19 Reject Interval / Residence / Partial Electronic (A.1.7.1) (February/March)

20 237. BellSouth met the 10-hour benchmark interval for 4,386 of the 6,001
21 rejected LSRs for this sub-metric in February and for 4,349 of the 5,523
22 rejected LSRs in March 2002. BellSouth met the benchmark for this sub-
23 metric in January 2002.

1 Reject Interval / Design (Specials) / Partial Electronic (A.1.7.3) (January)

2 238. There were only two LSRs rejected for this sub-metric in January 2002.

3 The small universe of orders for this sub-metric does not provide a conclusive
4 benchmark comparison. There was no CLEC activity for this sub-metric in
5 either February or March 2002.

6
7 Reject Interval / PBX / Partial Electronic (A.1.7.4) (March)

8 239. There was only one LSR rejected for this sub-metric in March 2002. This
9 small universe does not provide a conclusive benchmark comparison. There
10 was no CLEC activity for this sub-metric in either January or February 2002.

11
12 Reject Interval / ISDN / Partial Electronic (A.1.7.6) (January)

13 240. There were only two LSRs rejected for this sub-metric in January 2002.

14 This small universe does not provide a conclusive benchmark comparison.

15 There was no CLEC activity for this sub-metric in either February or March
16 2002.

17
18 FOC Timeliness / Residence / Partial Electronic (A.1.12.1) (February/March)

19 241. BellSouth met the 10-hour benchmark interval for 11,303 of the 16,433

20 FOCs returned for this sub-metric in February and for 12,470 of the 15,771

21 FOCs returned in March 2002. BellSouth met the benchmark for this sub-
22 metric in January 2002.

23
24 FOC Timeliness / ISDN / Partial Electronic (A.1.12.6) (January/March)

1 242. There were only two LSRs rejected for this sub-metric in January and one
2 LSR rejected in March 2002. This small universe does not provide a
3 conclusive benchmark comparison. BellSouth met the benchmark for this
4 sub-metric in February 2002.

5
6 243. The following FOC & Reject Response Completeness sub-metrics did not
7 meet the benchmarks for January, February and/or March 2002:

8
9 FOC Reject & Response Completeness / ISDN / TAG / Electronic (A.1.14.6.2)
10 (February)

11 244. There was only one order for this sub-metric in February 2002. The small
12 universe for this sub-metric does not provide a conclusive benchmark
13 comparison. There was no CLEC activity for this sub-metric in either January
14 or March 2002.

15
16 FOC Reject & Response Completeness / Residence / Manual (A.1.16.1)
17 (January/March)

18 245. BellSouth met the completeness criteria for 1,326 of the 1,432 responses
19 for this sub-metric in January and for 762 of the 821 responses in March 2002.
20 The 95% benchmark required that 1,361 of the 1,432 LSRs in January and
21 780 of the 821 LSRs in March meet the criteria. BellSouth met the
22 benchmark for this sub-metric in February 2002.

23

1 FOC Reject & Response Completeness / Business / Manual (A.1.16.2)

2 (January/February/March)

3 246. BellSouth met the completeness criteria for 1,106 of the 1,194 responses
4 for this sub-metric in January, for 884 of the 933 responses in February and
5 for 1,026 of the 1,093 responses in March 2002. The 95% benchmark
6 required that 1,135 of 1,194 LSRs for January, 887 of the 933 LSRs for
7 February and 1,039 of the 1,093 LSRs for March meet the criteria. BellSouth
8 continues to focus on this measurement in order to improve results to meet the
9 benchmark.

10
11 FOC Reject & Response Completeness / Design (Specials) / Manual (A.1.16.3)

12 (February/March)

13 247. BellSouth met the completeness criteria for 112 of the 119 responses for
14 this sub-metric in February and for 102 of the 114 responses returned in
15 March 2002. The 95% benchmark required that 114 of 119 LSRs for
16 February and 109 of the 114 responses for March meet the criteria. BellSouth
17 met the benchmark for this sub-metric in January 2002.

18
19 FOC Reject & Response Completeness / PBX / Manual (A.1.16.4)

20 (January/February/March)

21 248. BellSouth met the completeness criteria for 52 of the 56 responses for this
22 sub-metric in January, for 30 of the 34 responses in February and for 32 of the
23 36 responses in March 2002. The 95% benchmark required that 54 of 56
24 LSRs in January, 33 of 34 LSRs in February and 35 of 36 LSRs in March

1 meet the criteria. BellSouth continues to focus on this measurement in order
2 to improve results to meet the benchmark.

3
4 FOC Reject & Response Completeness / Centrex / Manual (A.1.16.5) (January)

5 249. BellSouth met the completeness criteria for 9 of the 10 orders for this sub-
6 metric in January 2002. The 95% benchmark required that all 10 of 10 LSRs
7 meet the criteria. With a universe size of only 10 orders and a 95%
8 benchmark, a problem on even one order would cause a miss for the entire
9 sub-metric. BellSouth met the benchmark for this sub-metric in February and
10 March 2002.

11
12 FOC Reject & Response Completeness / ISDN / Manual (A.1.16.6) (March)

13 250. BellSouth met the completeness criteria for 24 of the 27 orders for this
14 sub-metric in March 2002. The 95% benchmark required that 26 of 27 LSRs
15 meet the criteria. BellSouth met the benchmark for this sub-metric in January
16 and February 2002.

17
18 Resale Provisioning Measures

19
20 251. For the months of January, February and March 2002, BellSouth met or
21 exceeded the benchmarks or retail analogues for 86%, 87%, and 88%
22 respectively, of all Resale provisioning measures. The details supporting the
23 March 2002 percentage are delineated in Items A.2.1.1.1.1 through
24 A.2.25.3.2.2 of Attachment 1J.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Order Completion Interval

252. BellSouth consistently has performed well in provisioning of resale for the CLECs in Florida. BellSouth has met or exceeded the retail analogue for 44 of the 53 resale provisioning sub-metrics with CLEC activity during the months of January through March 2002. As an example, the average installation interval for the dispatched orders for Residence Resale was 2.89 days compared with 4.37 days for the retail analogue in January through March 2002. For non-dispatched orders for Residence Resale the CLEC interval was 0.67 days compared with 0.82 days for the retail analogue in January through March 2002. The average installation interval for the dispatched orders for Business Resale was 2.93 days compared with 2.27 days for the retail analogue in January through March 2002. For non-dispatched orders for Business Resale the CLEC interval was 0.91 days compared with 1.41 days for the retail analogue in January through March 2002.

253. As discussed in Checklist Item 4, the failure to properly “L” code the appropriate orders and the missed appointments for customer reasons negatively impacts the OCI measurements. All LSRs seeking extended intervals should receive an “L” code status. This would exclude these LSRs from the OCI measurement.

254. The following are the OCI sub-metrics for which BellSouth did not meet the retail analogue in January, February and/or March 2002:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Order Completion Interval / Business / < 10 Circuits / Dispatch (A.2.1.2.1.1)
(January/February/March)

255. The average order completion interval for CLEC orders in this sub-metric for January was 2.89 days compared to an average of 2.29 days for the retail analogue, for February was 2.94 days for CLECs compared to 2.35 days for the retail analogue and for March 2002 was 2.96 days for CLECS compared to 2.16 days for the retail analogue. These differences of less than one day, on average, do not hinder the CLECs' ability to compete in this area.

Order Completion Interval / PBX / >= 10 Circuits / Dispatch (A.2.1.4.2.1)
(February)

256. There was only one order for this sub-metric in February 2002. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in January and March 2002.

Order Completion Interval / PBX / >= 10 Circuits / Non-Dispatch (A.2.1.4.2.2)
(January/March)

257. There were only seven orders for this sub-metric in January and four orders for March 2002. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in February 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Order Completion Interval / Centrex / < 10 Circuits / Non-Dispatch (A.2.1.5.1.2)
(February)

258. There were only ten orders for this sub-metric in February 2002. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in January and March 2002.

Order Completion Interval / Centrex / >= 10 Circuits / Non-Dispatch (A.2.1.5.2.2)
(January)

259. There was only one order for this sub-metric in January 2002. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in February and March 2002.

Order Completion Interval / ISDN / >= 10 Circuits / Non-Dispatch (A.2.1.6.2.2)
(March)

260. The average order completion interval for CLEC orders in this sub-metric for March was 9.79 days compared to an average of 3.73 days for the retail analogue. OCI is adversely affected by LSRs for which CLECs request intervals beyond the offered interval. When a CLEC requests an interval beyond the available interval offered by BellSouth, an "L" code should be entered on the Service Order generated by BellSouth. Such "L" coded orders

1 are excluded from the OCI metrics. BellSouth met the retail analogue
2 comparison for this sub-metric in January and February 2002.

3
4 Held Orders

5 261. BellSouth has provided outstanding service for the Resale products in this
6 area. BellSouth exceeded the retail analogue comparison for all 102 of the
7 102 sub-metrics with CLEC activity during the months of January through
8 March 2002.

9
10 % Jeopardies

11 262. BellSouth uses the “Jeopardy” notice to identify potential problems that
12 could delay installations. BellSouth in Florida met the retail analogue
13 comparison for all 16 of the 16 sub-metrics with CLEC activity in the months
14 January through March 2002.

15
16 Missed Installation Appointments

17 263. BellSouth met the retail analogue comparison for 44 of the 55 sub-metrics
18 for resale missed installation appointments during January through March
19 2002. Even though retail analogue comparisons were not met for 11 sub-
20 metrics over this three-month period, BellSouth met the installation due dates
21 for 99.5% of all the installations scheduled during the period. The following
22 are the sub-metrics that did not meet the retail analogue comparisons for the
23 January through March 2002 period:

1 % Missed Installation Appointments / Residence / < 10 Circuits / Non-Dispatch

2 (A.2.11.1.1.2) (January/February/March)

3 264. BellSouth missed only 141 of the 61,307 installation appointments
4 scheduled for this sub-metric in January, missed 216 of the 55,392
5 appointments scheduled in February and missed 179 of the 57,811 installation
6 appointments scheduled for March 2002. Both the CLECs and BellSouth
7 retail had over 99% of all orders completed as scheduled in January, February
8 and March 2002. When BellSouth provisions high quality service coupled
9 with very large universe sizes, it can cause an apparent out of equity condition
10 from a quantitative viewpoint. In these cases, there is very little variation and
11 the universe size is so large that the Z-test becomes overly sensitive to any
12 difference. In other words, the statistical test shows that the measurement
13 does not meet the fixed critical value when compared with the retail analogue,
14 but BellSouth's actual performance for both CLECs and its own retail
15 operations is at a very high level – in this case over 99%. From a practical
16 point of view, the CLECs' ability to compete has not been hindered even
17 though the statistical results may technically show that BellSouth failed to
18 meet the benchmark/analogue.

19
20 % Missed Installation Appointments / Business / < 10 Circuits / Dispatch

21 (A.2.11.2.1.1) (January/February/March)

22 265. BellSouth missed only 28 installation appointments out of the 554
23 appointments scheduled for this sub-metric in January, missed 15 of the 393
24 appointments scheduled in February and missed 12 of the 396 appointments

1 scheduled for March 2002. BellSouth completed between 95% and 97% of
2 appointments for both BellSouth retail and the CLECs over the three-month
3 period.

4
5 % Missed Installation Appointments / Business / < 10 Circuits / Non-Dispatch
6 (A.2.11.2.1.2) (February/March)

7 266. BellSouth missed only 7 of the 2,980 scheduled appointments for this sub-
8 metric in February and missed 17 of the 2,868 appointments scheduled for
9 March 2002. Both the CLECs and BellSouth retail had over 99% of all orders
10 completed as scheduled in both February and March. BellSouth met the retail
11 analogue comparison for this sub-metric in January 2002.

12
13 % Missed Installation Appointments / PBX / < 10 Circuits / Non-Dispatch
14 (A.2.11.4.1.2) (February)

15 267. BellSouth completed 25 of the 26 installation appointments as scheduled
16 in February 2002. There were no systemic installation issues identified for the
17 missed appointment. BellSouth met the retail analogue comparison for this
18 sub-metric in January and March 2002.

19
20 % Missed Installation Appointments / ISDN / < 10 Circuits / Dispatch
21 (A.2.11.6.1.1) (January)

22 268. BellSouth completed 10 of the 12 scheduled appointments for this sub-
23 metric in January 2002. There were no patterns or systemic installation issues

1 identified for the two missed appointments. BellSouth met the retail analogue
2 comparison for this sub-metric in February and March 2002.

3
4 % Missed Installation Appointments / ISDN / < 10 Circuits / Non-Dispatch

5 (A.2.11.6.1.2) (February)

6 269. BellSouth completed 12 of the 13 scheduled appointments for this sub-
7 metric in February 2002. There were no patterns or systemic installation
8 issues identified for the missed appointment. BellSouth met the retail
9 analogue comparison for this sub-metric in January and March 2002.

10
11 Provisioning Troubles within 30 Days

12 270. Over the period from January through March 2002, BellSouth met or
13 exceeded the retail analogue for 45 of the 54 sub-metrics with CLEC activity.
14 Of the 9 sub-metrics that did not meet the retail analogue comparison, 3 had
15 CLEC order universe sizes too small to provide a statistically conclusive
16 comparison to the retail analogue. Of the remaining 6 missed sub-metrics, a
17 large percentage of the trouble reports for these sub-metrics were closed to no
18 trouble found.

19
20 % Provisioning Troubles w/i 30 days / Residence / < 10 Circuits / Non-Dispatch

21 (A.2.12.1.1.2) (January/February/March)

22 271. In January 2002, there were 2,116 troubles reported for the 47,332 orders
23 that completed in the prior 30 days. 36% of those troubles were closed as “no
24 trouble found.” In February 2002, there were 2,654 troubles reported for the

1 61,307 orders that completed in the prior 30 days. In March 2002, there were
2 2,520 troubles reported for the 55,392 orders that completed in the prior 30
3 days. Sixty-five percent of the total trouble reports for this sub-metric over
4 the three-month period were associated with one customer. Thirty-six percent
5 of the February trouble reports and thirty-three percent of the March reports
6 were closed as “no trouble found.” With the exclusion of the “no trouble
7 found” reports, CLEC results for this sub-metric would have been better than
8 for the retail analogue in each of the three months. BellSouth is conducting an
9 analysis of the provisioning situation with CLECs and will conduct joint
10 sessions to determine how to reduce the number of “no trouble found” reports.

11
12 % Provisioning Troubles w/i 30 days / Residence / >= 10 Circuits / Dispatch

13 (A.2.12.1.2.1) (February)

14 272. There was only one trouble report for this sub-metric in February 2002.

15 The small universe of orders for this sub-metric does not provide a statistically
16 conclusive comparison to the retail analogue. BellSouth met the retail
17 analogue comparison for this sub-metric in January and March 2002.

18
19 % Provisioning Troubles w/i 30 days / Business / < 10 Circuits / Dispatch

20 (A.2.12.2.1.1) (January/February/March)

21 273. There were 30 troubles reported for the 480 orders that completed for this
22 sub-metric in the 30 days prior to January 2002. Of the 30 troubles reported
23 in January, 13 (43%) were closed as “no trouble found.” In February 2002,
24 there were 27 troubles reported for the 554 orders that completed in the prior

1 30 days. Of the 27 troubles reported in February, 10 (37%) were closed as
2 “no trouble found.” In March 2002, there were 19 troubles reported for the
3 393 orders that completed in the prior 30 days. Of the 19 troubles reported, 6
4 (32%) were closed as “no trouble found.”

5
6 % Provisioning Troubles w/i 30 days / Centrex / < 10 Circuits / Dispatch
7 (A.2.12.5.1.1) (March)

8 274. There were only three troubles reported for this sub-metric in March 2002
9 for orders that completed in the prior 30 days. The small universe of orders
10 for the month does not provide a statistically conclusive comparison to the
11 retail analogue. BellSouth met the retail analogue comparison for this sub-
12 metric in January and February 2002.

13
14 % Provisioning Troubles w/i 30 days / Centrex / < 10 Circuits / Non-Dispatch
15 (A.2.12.5.1.2) (January)

16 275. There was only one trouble reported for this sub-metric in January 2002
17 for orders that completed in the prior 30 days. There were no systemic
18 installation issues identified for the one trouble report. BellSouth met the
19 retail analogue comparison for this sub-metric in February and March 2002.

20
21 Service Order Accuracy

22 276. BellSouth is committed to meeting the needs of the CLECs by making
23 sure the orders are written as requested. BellSouth’s Service Order accuracy
24 measurement addresses all orders regardless of whether the order was

1 submitted electronically (TAG, EDI or LENS) or manually (using fax or
2 mail). Of the 32 sub-metrics that had activity in the months of January,
3 February and March 2002, BellSouth made the benchmark for 15 of them.
4 BellSouth continues to work with its service representatives to improve the
5 quality of the service orders they produce. Of the five sub-metrics that did not
6 meet the 95% benchmark for two of the three months, all of them were either
7 two or three service orders from meeting the benchmark during the period for
8 at least one of the two months. In February, the business dispatch less than 10
9 sub-metric (A.2.25.2.1.1) met 146 of 155 with 148 orders required at the 95%
10 level. The business dispatch greater than 10 sub-metric (A.2.25.2.2.1) met 11
11 of 12 in January. The 95% benchmark required all 12 in January. With a
12 95% benchmark and in many cases sample sizes of less than 20, there is very
13 little room for error. The overall trend is improving for the majority of the
14 sub-metrics. While BellSouth is not meeting all of the sub-metrics each
15 month, many of them are within one or two orders of meeting the objective.
16 The following are the resale service order accuracy sub-metrics that did not
17 meet the benchmarks in January, February and/or March 2002:

18
19 Service Order Accuracy / Residence / < 10 Circuits / Dispatch (A.2.25.1.1.1)
20 (January/March)

21 277. BellSouth met the standard criteria for 67 of the 74 orders reviewed in this
22 sub-metric for January and for 129 of the 140 orders reviewed in March 2002.
23 The 95% benchmark required that 71 of the 74 orders for January and 133 of

1 the 140 orders for March meet the criteria. BellSouth met the benchmark for
2 this sub-metric in February 2002.

3
4 Service Order Accuracy / Residence / >= 10 Circuits / Dispatch (A.2.25.1.2.1)

5 (January)

6 278. BellSouth met the standard for 10 of the 11 orders reviewed in this sub-
7 metric for January 2002. The 95% benchmark required that all 11 of the 11
8 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
9 February and March 2002.

10
11 Service Order Accuracy / Business / < 10 Circuits / Dispatch (A.2.25.2.1.1)

12 (January/February/March)

13 279. BellSouth met the standard for 109 of the 125 orders reviewed in this sub-
14 metric for January, for 146 of the 155 orders reviewed in February and for 137
15 of the 150 orders reviewed in March 2002. The 95% benchmark required that
16 119 of the 125 orders for January, 148 of the 155 orders for February and 143
17 of the 150 orders for March meet the criteria, based on the quantity of orders
18 for the sub-metric. BellSouth continues to focus on improving the
19 performance for this measure to meet the benchmark.

20
21 Service Order Accuracy / Business / < 10 Circuits / Non-Dispatch (A.2.25.2.1.2)

22 (January/March)

23 280. BellSouth met the standard for 69 of the 74 orders reviewed for this sub-
24 metric in January and for 122 of the 130 orders reviewed in March 2002. The

1 95% benchmark set a requirement of 71 of the 74 orders for January and 124
2 of the 130 orders for March, based on the quantity of orders for this sub-
3 metric. BellSouth met the benchmark for this sub-metric in February 2002.

4
5 Service Order Accuracy / Business / >= 10 Circuits / Dispatch (A.2.25.2.2.1)
6 (January)

7 281. BellSouth met the standard for 11 of the 12 orders reviewed for this sub-
8 metric in January 2002. The 95% benchmark set requirements of all 12 of the
9 12 orders. With a 95% benchmark and a universe size of only 12 orders,
10 problems with even one order causes a miss for the entire sub-metric.
11 BellSouth met the benchmark for this sub-metric in February and March 2002.

12
13 Service Order Accuracy / Business / >= 10 Circuits / Non-Dispatch
14 (A.2.25.2.2.2) (January/February/March)

15 282. BellSouth met the standard criteria for 17 of the 20 orders reviewed for
16 this sub-metric in January, for 15 of the 16 orders reviewed in February and
17 for 11 of the 13 orders reviewed in March 2002. The 95% benchmark set
18 requirements of 19 of the 20 orders in January, all 16 of the 16 orders in
19 February and all 13 of the 13 orders for March, based on the quantity of orders
20 for this sub-metric. BellSouth continues to focus on improving the
21 performance for this measure to meet the benchmark.

22
23 Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch
24 (A.2.25.3.1.1) (February/March)

1 283. BellSouth met the standard for 54 of the 60 orders reviewed for this sub-
2 metric in February and for 30 of the 37 orders reviewed for March 2002. The
3 95% benchmark set a requirement of 57 of the 60 orders in February and 36 of
4 the 37 orders for March, based on the quantity of orders for this sub-metric.
5 BellSouth met the benchmark for this sub-metric in January 2002.

6
7 Service Order Accuracy / Design (Specials) / < 10 Circuits / Non-Dispatch
8 (A.2.25.3.1.2) (March)

9 284. BellSouth met the standard for 90 of the 98 orders reviewed for this sub-
10 metric in March 2002. The 95% benchmark set a requirement of 94 of the 98
11 orders, based on the quantity of orders for this sub-metric. BellSouth met the
12 benchmark for this sub-metric in January and February 2002.

13
14 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Non-Dispatch
15 (A.2.25.3.2.2) (January/February)

16 285. There were only 10 orders reviewed for this sub-metric in January 2002.
17 The small number of orders reviewed for this sub-metric does not provide a
18 conclusive benchmark comparison. In February 2002, BellSouth met the
19 standard criteria for 14 of the 17 orders reviewed for this sub-metric. The
20 95% benchmark set a requirement of all 17 of the 17 orders. BellSouth met
21 the benchmark for this sub-metric in March 2002.

22
23 Resale Maintenance and Repair (M&R) Measures

1 286. BellSouth met the relevant retail analogues for 87% of all the Resale
2 Maintenance & Repair measurements in January, for 89% of the sub-metrics
3 in February and for 84% of the sub-metrics in March 2002. Overall, for the
4 January through March 2002 period, BellSouth met 155 of the 180 Resale
5 M&R sub-metrics that had CLEC activity. The sub-metrics for which
6 BellSouth did not meet the retail analogues in January, February and/or March
7 2002 were:

8
9 Missed Repair Appointments

10 287. During January through March 2002, BellSouth met the retail analogue
11 comparison for 32 of the 36 sub-metrics with CLEC activity. All but one of
12 the sub-metrics in this measure met the retail analogue comparison for at least
13 two of the three months.

14
15 288. The following are the resale missed repair appointment sub-metrics that
16 did not meet the retail analogue for January, February and/or March 2002:

17
18 Missed Repair Appointments / Residence / Non-Dispatch (A.3.1.1.2)

19 (January/March)

20 289. BellSouth completed 2,697 of the 2,733 repair appointments as scheduled
21 for this sub-metric in January and completed 1,787 of the 1,811 appointments
22 scheduled for March 2002. BellSouth provided over 98% repair completion
23 rate for both CLECs and the retail analogue in both months. In January, 18 of
24 the 36 missed repair appointments were closed to “no trouble found,” but the

1 final closeout was after the due date. In March, 14 of the 24 reports (58%)
2 were closed as "no trouble found." No other patterns or systemic issues were
3 identified for the missed repair appointments. BellSouth met the retail
4 analogue comparison for this sub-metric in February 2002.

5
6 Missed Repair Appointments / PBX / Non-Dispatch (A.3.1.4.2) (March)

7 290. BellSouth completed 10 of the 15 repair appointments as scheduled for
8 this sub-metric in March 2002. There were no patterns or systemic
9 maintenance issues identified for the five missed appointments for the month.
10 BellSouth met the retail analogue comparison for this sub-metric in January
11 and February 2002.

12
13 Missed Repair Appointments / Centrex / Dispatch (A.3.1.5.1) (January)

14 291. BellSouth completed 13 of the 19 repair appointments as scheduled for
15 this sub-metric in January 2002. There were no maintenance issues or
16 patterns identified for the 6 missed appointments. BellSouth met the retail
17 analogue comparison for this sub-metric in February and March 2002.

18
19 Customer Trouble Report Rate

20 292. During January through March 2002, BellSouth met or exceeded 20 of the
21 36 sub-metrics for this measure. During the three-month period, the majority
22 of the CLEC results had greater than 98% trouble free service for the almost
23 210,000 average lines in service. The results for most of the sub-metrics that
24 did not meet the retail analogue comparison were less than 1% higher than the

1 analogue. There was also a large number of trouble reports closed as no
2 trouble found during this period. The following are the resale customer
3 trouble report rate sub-metrics that did not meet the retail analogue
4 comparisons for January, February and/or March 2002:

5
6 Customer Trouble Report Rate / Residence / Dispatch (A.3.2.1.1)
7 (January/February/March)

8 293. There were 4,367 troubles reported for the 206,966 in service lines for this
9 sub-metric in January, 3,839 trouble reports for the 190,036 lines in service in
10 February and 2,952 trouble reports for the 159,559 lines in service in March
11 2002. Both the CLECs and BellSouth retail had no trouble reports for over
12 97% of the in service lines in all three months. There was less than 1%
13 difference in the report rates between retail and resale results for this sub-
14 metric for any of the three months. Many of the troubles due to wire and
15 facilities appear to be caused by CPE and/or CLEC problems. BellSouth
16 technicians will be trained on proper closeout procedures on troubles
17 involving CPE and CLEC interfaces.

18
19 Customer Trouble Report Rate / Residence / Non-Dispatch (A.3.2.1.2)
20 (January/February/March)

21 294. There were 2,732 troubles reported for the 206,986 lines in service in
22 January, 2,280 troubles reported for the 190,036 lines in service in February
23 and 1,811 troubles reported for the 159,559 lines in service in February 2002.
24 Both the CLECs and BellSouth retail had no trouble reports for over 98% of

1 the in service lines in all three months. There was less than 0.7% difference in
2 the report rates between retail and resale results for this sub-metric for any of
3 the three months. Of the 2,732 total January trouble reports, 1,973 reports
4 (72%) were closed as “no trouble found.” Of the 2,280 total February trouble
5 reports, 1,668 reports (73%) were closed as “no trouble found.” Of the 1,819
6 total March trouble reports, 1,173 reports (65%) were closed as “no trouble
7 found.” Without these “no trouble found” reports, CLEC results would have
8 been better than for the retail analogue for this sub-metric in all three months.
9 One CLEC generated 84% of the January trouble reports, 83% of the February
10 trouble reports and 78% of the March 2002 trouble reports for this sub-metric.

11
12 Customer Trouble Report Rate / Business / Dispatch (A.3.2.2.1)
13 (January/February/March)

14 295. There were 763 troubles reported for the 8,018 in service lines for this
15 sub-metric in January, 631 trouble reports for the 6,772 lines in service in
16 February and 383 troubles reported for the 5,832 lines in service in March
17 2002. In January, February and March, 129 (17%), 87 (14%) and 55 (14%),
18 respectively, of the trouble reports were closed as “no trouble found.”
19 BellSouth is still investigating this sub-metric to determine if any systemic
20 maintenance issues are present.

21
22 Customer Trouble Report Rate / Business / Non-Dispatch (A.3.2.2.2)
23 (January/February/March)

1 296. There were 411 troubles reported for the 8,018 in service lines for this
2 sub-metric in January, 335 troubles reported for the 6,772 lines in service in
3 February and 193 troubles reported for the 5,832 lines in service in March
4 2002. Of the 411 total January 2002 trouble reports, 279 (68%) of the reports
5 were closed as “no trouble found.” Of the 335 total February trouble reports,
6 225 (67%) of the reports were closed as “no trouble found.” Of the 193 total
7 March trouble reports, 110 (57%) of the reports were closed as “no trouble
8 found.”

9
10 Customer Trouble Report Rate / Design (Specials) / Dispatch (A.3.2.3.1)
11 (January/March)

12 297. There were 48 troubles reported in January 2002 for the 2,819 lines in
13 service for this sub-metric, and in March, 36 trouble were reported for the
14 2,717 lines in service. Both the CLECs and BellSouth retail customers
15 received over 98% trouble free service for the lines in service for this sub-
16 metric in both months. BellSouth met the retail analogue comparison for this
17 sub-metric in February 2002.

18
19 Customer Trouble Report Rate / PBX / Non-Dispatch (A.3.2.4.2) (March)

20 298. There were only 15 trouble reports for the 7,292 in service lines for this
21 sub-metric in March 2002. BellSouth provided over 99.7% trouble free
22 service for both retail and the CLECs for this sub-metric in March. Of the 16
23 March trouble reports, 11 (73%) were closed as “no trouble found.” From a
24 practical point of view, the CLECs’ ability to compete has not been hindered

1 even though the statistical results may technically show that BellSouth failed
2 to meet the benchmark/analogue. BellSouth met the retail analogue
3 comparison for this sub-metric in January and February 2002.

4
5 Customer Trouble Report Rate / Centrex / Dispatch (A.3.2.5.1) (January)

6 299. There were only 19 trouble reports for the 2,096 in service lines for this
7 sub-metric in January 2002. BellSouth provided over 99% trouble free
8 service for both retail and the CLECs for this sub-metric in January. From a
9 practical point of view, the CLECs' ability to compete has not been hindered
10 even though the statistical results may technically show that BellSouth failed
11 to meet the benchmark/analogue. BellSouth met the retail analogue
12 comparison for this sub-metric in February and March 2002.

13
14 Maintenance Average Duration

15 300. The maintenance average duration for dispatch and non-dispatch repair
16 appointments met or exceeded the retail analogue for Resale Services for 35
17 of the 36 sub-metrics for January through March 2002. For the Residence
18 dispatched repair appointments, BellSouth averaged only 15.14 hours for the
19 CLECs and 17.60 hours for the retail analogue. The non-dispatched repairs
20 were averaged much less at only 4.62 hours for the CLECs and 5.37 hours for
21 the retail analogue.

22
23 301. The following sub-metric did not meet the retail analogue comparison for
24 March 2002:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Maintenance Average Duration / PBX / Non-Dispatch (A.3.3.4.2) (March)

302. There were only 15 trouble reports for this sub-metric in March 2002. The average repair interval for these 15 orders was 8.75 hours for CLEC orders compared to 4.05 hours for the retail analogue. There were no patterns or systemic maintenance issues identified for any of these orders. BellSouth met the retail analogue comparison for this sub-metric in January and February 2002.

Repeat Troubles within 30 Days

303. Over the January through March 2002 period, BellSouth met the retail analogue comparison for 33 of the 36 sub-metrics for resale repeat trouble reports. For the three sub-metrics that did not meet the retail analogue comparisons, the small universe sizes of orders would not provide statistically conclusive comparisons to the retail analogue. The sub-metrics that did not meet the retail analogue comparisons for January, February and/or March 2002 were:

% Repeat Troubles within 30 Days / PBX / Non-Dispatch (A.3.4.4.2)

(February/March)

304. There were only 8 trouble reports for this sub-metric in February and 4 troubles reported in March 2002. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail

1 analogue. BellSouth met the retail analogue comparison for this sub-metric in
2 January 2002.

3
4 % Repeat Troubles within 30 Days / ISDN / Dispatch (A.3.4.6.1) (February)

5 305. There was only one trouble report for this sub-metric in February 2002.

6 The small universe of orders for this sub-metric does not provide a statistically
7 conclusive comparison to the retail analogue. BellSouth met the retail
8 analogue comparison for this sub-metric in January and March 2002.

9
10
11 Out of Service > 24 Hours

12 306. BellSouth met the retail analogue comparisons for 35 of the 36 sub-
13 metrics for this measurement over the January through March 2002 period.

14 The one sub-metric that did not meet the retail analogue comparison over the
15 period was:

16
17 Out of Service > 24 Hours / Business / Non-Dispatch (A.3.5.2.2) (February)

18 307. In February 2001, 10 of the 162 trouble reports for the month were out of
19 service longer than 24 hours. Seven of the ten orders involved one customer
20 and were out of service due to a single switch failure. None of the remainder
21 of the out of service orders revealed any patterns or systemic maintenance
22 issues. BellSouth met the retail analogue for this sub-metric in January and
23 March 2002.

24

1 **III. Summary**

2
3 308. As stated in the Introduction to the Analysis of Performance
4 Measurements section, BellSouth met or exceeded the criteria for 747 of the
5 860 sub-metrics (87%) for which there was CLEC activity in January, for 737
6 of 863 sub-metrics (85%) in February and for 741 of 874 sub-metrics (85%)
7 in March 2002.

8
9 309. During the three-month period of January through March 2002, there were
10 a total of 792 sub-metrics that had CLEC activity for all three months and that
11 were compared with either a benchmark or retail analogue. Of those 792 sub-
12 metrics, 689 or 87% satisfied the comparison criteria for a minimum of two of
13 the three months.

14
15

ATTACHMENT 1
June 2002 Monthly Status Report
Consisting of 10 Pages

1.0 Document Objective

In this document, KPMG Consulting provides a Monthly Status Report on developments related to the BellSouth FL OSS Testing Project. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A more detailed report on specific test items from the Master Test Plan is provided in the table in section 4.0. Each item presented in the tables in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable.

2.0 Key Developments

- **Order Management (OM):**
 - *TVV1-POP Functional Evaluation:* KPMG Consulting reviewed the remaining responses from the third functional test and continued to retest New Centrex orders.
 - *TVV2-POP Volume Performance Test:* KPMG Consulting conducted a Manual Volume Peak Day retest on June 3, 2002 and a Manual Volume Stress Day test on June 13, 2002.
 - *TVV3-Flow Through Evaluation:* KPMG Consulting concluded TVV3 residential, business, UNE, and LNP retesting.
 - *PPR7-POP Manual Order Processing Evaluation and PPR 8-POP Work Center Help Desk Support:* KPMG Consulting completed all PPR7 and PPR8 testing.

- **Repair, Provisioning and Maintenance (RPM):**
 - *TVV4-Provisioning Verification and Validation:* KPMG Consulting completed retests associated with Directory Listings, CSRs, Switch Translations, and Intercept Messaging. KPMG Consulting is conducting a retest associated with Line Loss Reporting.
 - *TVV5-M&R TAFI Functional Evaluation:* KPMG Consulting completed all TVV5 testing.
 - *TVV6-M&R ECTA Functional Evaluation:* KPMG Consulting completed all TVV6 testing.
 - *TVV7-M&R TAFI Performance Evaluation:* KPMG Consulting completed all TVV7 testing.

- *TVV8-M&R ECTA Performance Evaluation:* KPMG Consulting completed all TVV8 testing.
- *TVV9-M&R End-to-End Trouble Report Processing:* KPMG Consulting completed all TVV9 testing.
- *PPR6-Collocation and Network Design Verification and Validation:* KPMG Consulting completed all PPR6 testing.
- *PPR9-Provisioning Process Evaluation:* KPMG Consulting completed all PPR9 testing.
- *PPR14-End-to-End M&R Process:* KPMG Consulting completed all PPR14 testing.
- *PPR15-M&R Work Center Support:* KPMG Consulting completed all PPR15 testing.
- *PPR16-Network Surveillance Support:* KPMG Consulting completed all PPR16 testing.

- **Billing**
 - *PPR10-Billing Work Center/Help Desk Support Evaluation:* KPMG Consulting completed all of its interviews with BellSouth. Further clarification was requested of BellSouth and AT&T on documentation previously provided.
 - *PPR12-Daily Usage Production and Distribution Process Evaluation:* KPMG Consulting completed all PPR12 testing.
 - *PPR13-Bill Production and Distribution Process Evaluation:* KPMG Consulting integrated the information obtained from BellSouth interviews and documentation regarding the UNE billing upgrade and continues to update the Final Report.
 - *TVV10-Billing Functional Usage Evaluation:* KPMG Consulting finalized all analysis results relevant to the April/May 2002 DUF retest.
 - *TVV11-Functional Carrier Bill Evaluation:* KPMG Consulting continues to review individual test cases as bills are received. KPMG Consulting is concluding its reconciliation of UNE-P usage billing.

- **Performance Results Comparison (Metrics):**
 - *PMR 1 - Data Collection and Storage:* KPMG Consulting began assessing systems and reviewing documentation to validate current data collection and storage procedures applicable to the PMAP 4.0 processes.
 - *PMR2-Metrics Definitions and Standards:* KPMG Consulting began evaluating SQMs defined in the Florida Revised Interim Metrics (SQM document, adopted by the FPSC in November, 2000) for PMAP 4.0.
 - *PMR3-Change Management:* KPMG Consulting continued to review the change management process and monitor change management adherence.
 - *PMR 4-Data Integrity:* KPMG Consulting continued the completeness and accuracy phases for all domains as well as Data Integrity testing for the Test CLEC. KPMG Consulting continued to integrate the PMAP 4.0 upgrade into Data Integrity testing.
 - *PMR5-Metrics Calculation:* KPMG Consulting continued to validate SQM calculations for the CLEC Aggregate and BellSouth retail reports. The replication of regional and new metrics (added since October, 2000) is ongoing. KPMG Consulting also began replication testing within the PMAP 4.0.

- **Relationship Management Infrastructure (RMI):**
 - *PPR1-Change Management Process Verification and Validation Review:* On June 4 and June 26, 2002, KPMG Consulting attended the BellSouth Change Control Process Monthly Status Meetings. KPMG Consulting was also present for the June 20, 2002 testing process improvement meeting. KPMG Consulting continued to observe change management interaction between BellSouth and the CLEC community and evaluated the implementation process for Release 10.5. KPMG Consulting reviewed additional Change Management Process documentation and conducted a follow-up interview on June 11, 2002.
 - *PPR2-Account Establishment and Management Review:* KPMG Consulting continued to monitor Account Establishment and Management processes. KPMG Consulting also reviewed Account Management documentation.
 - *PPR3-Interface Help Desk Functional Review:* KPMG Consulting continued to review the interaction between the EC Support Help Desk and KPMG Consulting.
 - *PPR4-CLEC Training Verification and Validation Review:* KPMG Consulting conducted no PPR4 test activity.

- *PPR5-Interface Development*: KPMG Consulting continued to monitor the development of the CLEC Applications Verification Environment (CAVE). KPMG Consulting reviewed the BellSouth processes surrounding the implementation of Release 10.5, which BellSouth had been delayed until June 1. Exception 157 was amended to note defects associated with Release 10.5.

- **External Relations:**
 - KPMG Consulting issued 4 Observations (207 total to date) and 6 Exceptions (175 total to date) during the month of June. There are currently 14 open Observations and 29 open Exceptions.
 - The chart below details Observations and Exceptions by domain.

Domain	Exceptions Issued this month	Observations Issued this month	Total Exceptions Issued	Total Observations Issued	Open Exceptions	Open Observations
OM	1	0	77	68	7	5
RPM	1	0	15	32	3	0
Billing	1	0	20	14	2	1
RMI	0	1	23	21	3	1
Metrics	3	3	40	72	14	8
Total	6	4	175	207	29	15

- **Final Report:**
 - KPMG Consulting submitted draft version 1.0 of the Final Report to the Florida Public Service Commission and BellSouth on June 21, 2002.

3.0 Key Upcoming Activities

- TVV11 UNE Bill Validation Test
- PMR4 PMAP 4.0 testing
- PMR5 PMAP 4.0 testing
- TVV4 Line Loss Re-test
- Final Report Version 2.0 submission to the FPSC on July 30, 2002

4.0 Master Test Plan Specific Item Status

Domain	Ref ¹	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Order Management	VI-1	<i>TVV1: POP Functional Evaluation</i>	<ul style="list-style-type: none"> Completed transaction testing for the second re-test. Re-tested New Centrex orders. 		Observations 49, 87, 127, 198 Exceptions 16, 161, 162, 165,	<ul style="list-style-type: none"> Complete testing of New Centrex.
	VI-2	<i>TVV2: POP Volume Performance</i>	<ul style="list-style-type: none"> KPMG Consulting conducted Manual Volume Peak Day retesting on June 3, 2002. KPMG Consulting conducted Manual Volume Stress Day on June 13, 2002. 		Observation 199	<ul style="list-style-type: none"> No scheduled activity.
	VII-1	<i>TVV3: Flow Through Evaluation</i>	<ul style="list-style-type: none"> Concluded residential, business, UNE, and LNP re-tests. 		Exceptions 121, 122, 136	<ul style="list-style-type: none"> No scheduled activity.
	XIII-1	<i>PPR7: Manual Order Process</i>	<ul style="list-style-type: none"> No scheduled activity. 			<ul style="list-style-type: none"> No scheduled activity.
	XIII-2	<i>PPR8: Work Center Support Evaluation</i>	<ul style="list-style-type: none"> No scheduled activity. 			<ul style="list-style-type: none"> No scheduled activity.
Repair, Provisioning, and Maintenance	III-3	<i>Data Requests</i>	<ul style="list-style-type: none"> Validation retest for Line Loss Reporting continues. 		TVV4 Exceptions 84, 139, 171	<ul style="list-style-type: none"> Interviews, documentation, data requests, and clarification calls continue to be scheduled with BellSouth as needed.

BellSouth-FL OSS Testing Evaluation
 Monthly Status Report
 June 30, 2002

Domain	Ref ¹	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
	V-5	<i>CLEC Participation</i>	<ul style="list-style-type: none"> KPMG Consulting continues CLEC discussions for all tests as required. 			<ul style="list-style-type: none"> KPMG Consulting will use information gained in discussions to facilitate completion of all tests.
Billing	X-1	<i>TVV10: Billing Functional Usage Evaluation</i>	<ul style="list-style-type: none"> DUF retest analysis complete. Draft Final Report updated with retest results. 			
	XII-2	<i>TVV11: Functional Carrier Bill Evaluation</i>	<ul style="list-style-type: none"> Evaluating individual billing test cases as bills are received. Opened Exception 172. Retest Usage Analysis in final stages. Draft Final Report updated with latest results. 		Exceptions 44, 172	<ul style="list-style-type: none"> Finalize testing for bill validation. Finalize statistics and counts for the billing validation test. Address/Update Exception 44.
		<i>PPR10: Billing Work Center/Help Desk</i>	<ul style="list-style-type: none"> Interviews with BellSouth completed. Additional clarification requested of AT&T and BellSouth on billing dispute tracking documentation previously provided. 		Observation 202	<ul style="list-style-type: none"> Validate documentation changes promised by BellSouth to retest Observation 202. Evaluate the responses of BellSouth and AT&T on documentation clarification requests.

BellSouth-FL OSS Testing Evaluation
Monthly Status Report
June 30, 2002

Domain	Ref ^l	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
		<i>PPR12: Daily Usage Production & Distribution – Process Evaluation</i>	<ul style="list-style-type: none"> Draft final report updated to reflect recent test activity. 			<ul style="list-style-type: none"> No scheduled activity.
		<i>PPR13: Bill Production and Distribution Process Evaluation</i>	<ul style="list-style-type: none"> IBS/Tapestry interviews with BellSouth completed. IBS/Tapestry information from interviews and data requests has been integrated into the Final Report. 			<ul style="list-style-type: none"> No scheduled activity.
Metrics	VII-2	<i>PMR1: Data Collection and Storage</i>	<ul style="list-style-type: none"> Continued review of systems related to PMAP 4.0. 			
	VII-3	<i>PMR2: Metrics Definitions and Standards</i>	<ul style="list-style-type: none"> Continued to evaluate SQMs defined in the Florida Revised Interim Metrics (SQM document, adopted by FPSC 06/01). Completed analysis of Month III data and retesting of Observation related metrics. Began PMAP 4.0 retesting 			<ul style="list-style-type: none"> Conduct follow-up interviews as necessary.
	VII-4	<i>PMR3: Metrics Change Management</i>	<ul style="list-style-type: none"> Continued to monitor adherence to the Change Management Process. 			<ul style="list-style-type: none"> Conduct follow-up interviews as necessary.

BellSouth-FL OSS Testing Evaluation
 Monthly Status Report
 June 30, 2002

Domain	Ref ¹	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
	VII-5	<i>PMR4 Metrics Data Integrity</i>	<ul style="list-style-type: none"> Continued the completeness analysis phase for all domains. Continued the accuracy analysis phase for all domains. Continued the Metric Specific analysis for the all domains. Continued the Test CLEC data integrity analysis between KPMG Consulting systems and BellSouth's Legacy Systems. 		Exceptions 36, 113, 114, 120, 124, 143, 144, 145, 174, 175	<ul style="list-style-type: none"> Continue to extract data and analyze data in support of the data integrity comparisons.
	VII-6	<i>PMR5: Metrics Calculations</i>	<ul style="list-style-type: none"> Continued to validate SQM calculations for CLEC Aggregate and BellSouth retail reports and continued replication of regional metrics and new metrics (added since October 2000). Began replication of metrics using PMAP 4.0 data. 		Observation 176, 185, 195, 196, 200, 204, 206, 207 Exceptions 151, 153, 163, 173	<ul style="list-style-type: none"> Continue to analyze variances in support of the data replication effort.
Relationship Management Infrastructure	III-1	Data Requests	<ul style="list-style-type: none"> No activity 			

BellSouth-FL OSS Testing Evaluation
 Monthly Status Report
 June 30, 2002

Domain	Ref ¹	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
	IV-2	<i>PPR1: Change Management Practices Verification and Validation Review</i>	<ul style="list-style-type: none"> • Attended the BellSouth Change Control Process Monthly Status Meetings (6/4/02 and 6/26/02), and the Testing Process Improvement Meetings (6/20/02). • Continued to monitor the Change Management Process. • Began retest of Exception 123. • Reviewed Exception 88 internal process documents and Conducted a follow-up interview. • Closed Observation 124. • Closed Exception 155. • Issued and closed Observation 205. • Reviewed the release management process for Release 10.5. 		Exceptions 88, 123	<ul style="list-style-type: none"> • Continue to observe change management interaction between BellSouth and the CLEC community. • Continue Exception 123 retest.
	XI-1	<i>PPR2: Account Management</i>	<ul style="list-style-type: none"> • Reviewing additional documentation. • Completed retest of and closed Observation 166. • Closed Observation 115. 			<ul style="list-style-type: none"> • No scheduled activity.
	XI-2	<i>PPR3: OSS Interface Help Desk</i>	<ul style="list-style-type: none"> • Continued to review interaction between EC Support Help Desk and KPMG Consulting. 			<ul style="list-style-type: none"> • No scheduled activity.
	XII-1	<i>PPR4: CLEC Training</i>	<ul style="list-style-type: none"> • No scheduled activity. 			<ul style="list-style-type: none"> • No scheduled activity.

BellSouth-FL OSS Testing Evaluation
Monthly Status Report
June 30, 2002

Domain	Ref ¹	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
		<i>PPR5:OSS Interface Development</i>	<ul style="list-style-type: none"> Continue review of interface development process documentation. Attend BellSouth CLEC test improvement meetings. Continued to monitor the BellSouth Release Management Process for 10.6. Closed Exceptions 128 and 168. 		Observations, 148 Exceptions 157	<ul style="list-style-type: none"> Observe CLEC test improvement. Observe BellSouth plans for Release 10.6.
External Relations (CLEC Contact, Exceptions/Observations, Status Reporting)	I-18	<i>Exception/Observation Process</i>	<ul style="list-style-type: none"> Issued 4 Observations (207 total to date) and 6 Exceptions (175 total to date). There are currently 15 open Observations and 29 open Exceptions. 	The combined Observation/Exception call is held in conjunction with the Wednesday 10AM status call.		

¹ Referencing Methodology: An item referenced as I-n indicates that this item first appeared in the March 7, 2000 report. An item referenced as II-n indicates that this item first appeared in the April 7, 2000 report. An item referenced as III-n indicates that this item first appeared in the May 5, 2000 report. An item referenced as IV-n indicates that this item first appeared in the June 7, 2000 report. An item referenced as V-n indicates that this item first appeared in the July 10, 2000 report. An item referenced as VI-n indicates that this item first appeared in the August 7, 2000 report. An item referenced as VII-n indicates that this item first appeared in the September 7, 2000 report. An item referenced as VIII-n indicates that this item first appeared in the October 6, 2000 report. An item referenced as IX-n indicates that this item first appeared in the November 7, 2000 report. An item referenced as X-n indicates that this item first appeared in the December 7, 2000 report. An item referenced as XI-n indicates that this item first appeared in the January 8, 2001 report. An item referenced as XII-n indicates that this item first appeared in the February 7, 2001 report. An item referenced as XIII-n indicates that this item is new for this report.

Florida Third Party Test Metrics Exceptions

Open Exceptions as of July 9, 2002

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
<p>Exc #36/ <0.5% MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth does not properly construct the processed data used to validate the <i>FOC Timeliness</i> and <i>Reject Interval SQM</i> reports for May 2000.</p> <p>KPMG identified three initial issues in this exception: 1) inappropriate application of the weekend and holiday hours exclusion, 2) inappropriate inclusion of negative interval transactions in the non-mechanized results, and 3) unclear computation instructions regarding the handling of multiple responses for a single LSR. Regarding item one, BellSouth and KPMG resolved the weekend and holiday hours exclusion issue via a clarification of the business rules in March 2001. The impact of negative intervals for August and September 2001 data was 0.012 and 0.014% of the total non-mechanized LSR volume, respectively. A partial fix was implemented with October 2001 data and addressed all but one rejected non-mechanized LSR. The fix was fully implemented with November 2001 data. Regarding item 3, BellSouth has updated the business rules in the December 2001 redlined SQM to clarify that (in those cases where multiple FOCs or rejects are returned) the first FOC or reject returned should be used to calculate the duration.</p> <p>KPMG found the following additional Reject Interval discrepancies after a retest of November 2001 data: 4) inappropriate calculations for partially mechanized LSRs received and rejected after normal business hours and 5) inappropriate exclusion of LCSC off hours from the interval calculations for non-mechanized Resale Design LSRs. Regarding item 4, BellSouth has entered a fix to set reject interval equal to one minute, as opposed to an interval of zero, for partially mechanized LSRs that were received and rejected after normal business hours. This issue will be corrected with April 2002 data and has no impact on the results reported against the benchmark, which is calculated as a percentage returned in hours. Regarding item 5, BellSouth's calculations currently define the LSR in question as Resale Design, but exclude Resale Residence center off hours from the interval calculation. A fix has been entered to ensure the exclusion of Business and Complex off hours from interval calculations for Resale Design LSRs. Furthermore, in the months December 2001 through March 2002, there was not one instance when a Resale Design LSR was reported. This issue will be fixed with May 2002 data and has no impact on the results reported via the MSS.</p>
<p>Exc #113/ No MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth does not capture xDSL (Digital Subscriber Lines) transactions, which are processed through Corporate Order Gateway (COG), for the <i>Percent Flow-Through Service Requests (Summary & Detail) SQMs</i>.</p> <p>BellSouth remedied this omission effective with September 2001 data by manually including xDSL transactions in the UNE and Aggregate results. Furthermore, BellSouth mechanized the inclusion of xDSL transactions in the <i>Percent Flow-Through</i> results beginning with November 2001 data. BellSouth's xDSL-specific <i>Percent Flow-Through</i> results for August and September 2001 were 87.96% and 85.32%, respectively. The inclusion of xDSL data in September 2001 improved the UNE Flow-Through results by 0.5%, and had even less of a positive impact on the Aggregate results. In addition, KPMG has found that BellSouth does not provide an LSR detail report for xDSL LSRs. BellSouth will begin providing this information with September 2002 data. KPMG will retest this issue following the implementation of this fix. This issue has no impact on the results reported via the MSS.</p>
<p>Exc #114/ <0.5% MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth incorrectly excludes data between the BARNEY Snapshot and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the <i>FOC Timeliness SQM</i> for June 2001.</p> <p>This issue has the same allegations as GA Exception 145.</p> <p>KPMG believes that BellSouth incorrectly excluded 6,082 fully mechanized and 1,527 partially mechanized transaction records between the BARNEY Snapshot (early stage data) and PMAP NODS V (raw data) stages of the metrics data flows. In fact, 7,609 of the 7,609 "missing" records identified by KPMG were properly excluded from the <i>FOC Timeliness</i> raw data files. The remaining 9 records were associated with service requests for products that have not yet been mapped to an SQM-defined product category.</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
	<p>The 6,082 fully mechanized LSRs in question were excluded from BellSouth's raw data files for the following reasons:</p> <ul style="list-style-type: none"> - 6,023 LSRs (or 99.00%) were properly excluded as directory listing service requests - 33 LSRs were properly excluded as unbillable or Test OCNs - 21 LSRs were properly excluded having negative FOC durations - 5 LSRs associated with specific types of Non-Switched Combos have not been mapped to an SQM-defined product category (UNE Combo Other) <p>The 1,527 partially mechanized LSRs were excluded from BellSouth's raw data for the following reasons:</p> <ul style="list-style-type: none"> - 1,474 LSRs (or 96.53%) were properly excluded as directory listing service requests - 49 LSRs were properly excluded as coin (or payphone) services - 4 LSRs associated with specific types of Non-Switched Combos have not been mapped to an SQM-defined product category (UNE Combo Other) <p>BellSouth began reporting the results for directory listings in the UNE Other (Non-Design) product category beginning with September 2001 data. For the remaining 9 records (or 0.04% of reported records) identified by KPMG, BellSouth has targeted an update to map these Non-Switched Combos to the UNE Combo Other product category for April 2002 results.</p>
<p>Exc #120/ <0.5% MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth incorrectly excludes data between the BARNEY Snapshot and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized results for the <i>Percent Rejected Service Requests</i> SQM reports for June 2001.</p> <p>This issue is similar to GA Exception 145.</p> <p>KPMG believes that BellSouth incorrectly excluded 1,920 fully mechanized and 761 partially mechanized transaction records between the Barney Snapshot (early stage data) and PMAP NODS V (raw data) stages of the metrics data flows. In fact, 2,679 of the 2,681 "missing" records identified by KPMG were properly excluded from the <i>Percent Rejected Service Requests</i> raw data file. The remaining 2 records were associated with service requests for products that have not yet been mapped to an SQM-defined product category.</p> <p>The 1,920 fully mechanized LSRs in question were excluded from BellSouth's raw data files for the following reasons:</p> <ul style="list-style-type: none"> - 1,900 LSRs (or 99.53%) were properly excluded as directory listing service requests - 13 LSRs were properly excluded as test or unbillable OCNs - 7 LSRs were properly excluded as having negative intervals/durations <p>The 761 partially mechanized LSRs were excluded from BellSouth's raw data for the following reasons:</p> <ul style="list-style-type: none"> - 716 LSRs (or 94.09%) were properly excluded as directory listing service requests - 18 LSRs were actually identified in PMAP raw data - 9 LSRs were properly excluded as coin (or payphone) services - 8 LSRs were properly excluded as test or unbillable OCNs - 6 LSRs were properly excluded as "projects" - 2 LSRs were properly excluded as having been sent in the previous month - 2 LSRs associated with specific types of Non-Switched Combos have not been mapped to an SQM-defined product category (UNE Combo Other) <p>BellSouth began reporting the results for directory listings in the UNE Other- Non-Design product category beginning with September 2001 data. For the 2 missing records (or 0.01% of reported records) identified by KPMG, BellSouth has targeted an update to map these Non-Switched Combos to the UNE Combo Other product category for April 2002 results.</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
<p>Exc #121/ No MSS Impact (TVV-3)</p>	<p>KPMG could not identify Flow-Through Firm Order Confirmations (FOCs) on Local Number Portability (LNP) Local Service Requests (LSR) submitted via the mechanized ordering process.</p> <p>KPMG believes that BellSouth issued flow-through FOCs for 48% (62 of 128 received as of November 9, 2001) of LNP LSRs submitted via BellSouth's mechanized ordering interfaces. Of the 66 LSRs that dropped to the LCSC for manual handling, BellSouth has determined that 56 LSRs should have been classified as "Planned Manual Fallout" and excluded from the denominator of KPMG's calculation. BellSouth is currently investigating the remaining 10 LSRs. Assuming all 10 of these LSRs dropped to the LCSC for manual handling due to BellSouth error, then BellSouth's flow-through results for these LNP LSRs would be 86% (62 of 72), slightly better than the 85% benchmark published in the SQM. Per KPMG's request, BellSouth updated the <i>Percent Flow-Through Service Requests</i> business rules noted in the February 2002 red-line SQM to now include all LNP-based partial migrations and Standalone LNP supplements (except for due date changes) in the "Planned Manual Fallout" category. This is simply a documentation issue; BellSouth's systems were correctly classifying LNP-based partial migrations and Standalone LNP supplements (except for due date changes) as "Planned Manual Fallout". Based on BellSouth's response, KPMG ran an LNP flow-through re-test for LNP orders submitted between February 15, 2002 and May 23, 2002. Specifically excluding fatal rejects, auto clarification, CLEC-error system fallout, and orders classified as Planned Manual Fallout in O-3, KPMG found that 26 LNP FOCs flowed through of an expected 34 transactions. Eight LNP PONs fell out for unexpected manual handling and BellSouth found that all 8 of these PONs were submitted on a single billing account. The CSR for this account contained two virgules (//) in the ACN field, instead of the usual one (/). This invalid data caused the 8 LSRs to fallout for manual intervention. This was a one time billing account error and the CSR data was corrected on 05/08/02.</p>
<p>Exc #122/ No MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth did not provide flow-through classification information for Digital Subscriber Line (xDSL) orders submitted by KPMG.</p> <p>This issue is covered under Exception 113.</p>
<p>Exc #124/ No MSS Impact (PMR-4)</p>	<p>KPMG cannot replicate the values for the <i>Percent Flow-Through Service Requests (Detail) SQM</i> report for the CLEC Aggregate for November 2000.</p> <p>Although KPMG successfully tested this metric with June 2001 data, BellSouth was later compelled to restate these results due to software defects affecting June, July and August data. These defects are the same issues addressed in the original application. BellSouth manually recalculated the June 2001 <i>Percent Flow-Through</i> results in order to re-classify certain LSRs improperly coded as "Planned Manual Fallout" as either "CLEC Caused Fallout" or "BellSouth Caused Fallout". BellSouth has shared the recalculation methodology with KPMG and it is currently retesting June 2001 data. BellSouth implemented a permanent fix for this defect in its electronic ordering systems beginning with September 2001 data and BellSouth's restated Flow-Through replication results for June, July, and August 2001 data are correct. On April 29, 2002, KPMG amended this exception to reclassify it as a Data Integrity issue (PMR-4). The issue identified in this exception remains the same and KPMG will begin retesting with May 2002 data. This data reporting issue has no impact on the results reported via the MSS.</p>
<p>Exc #143/ <0.5% MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth incorrectly excludes data between the BARNEY Snapshot and NODS stages of the PMAP process for non-mechanized orders that go into the calculation of the <i>Percent Rejected Service Requests SQM</i> report for June 2001.</p> <p>KPMG believes that BellSouth incorrectly excluded 17,131 non-mechanized transaction records between the Barney Snapshot (early stage data) and PMAP NODS V (raw data) stages of the metrics data flow. Due to the large volume of LSRs identified, BellSouth selected the first 1,749 records in the data file provided by KPMG in order to identify the</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
	<p>data exclusion criteria applied to each LSR.</p> <p>1,745 of the 1,749 non-mechanized LSRs in question were excluded from BellSouth's raw data files for the following reasons:</p> <ul style="list-style-type: none"> - 943 LSRs were properly excluded because the LSR was received in the previous reporting month - 412 LSRs were properly excluded as directory listings (BellSouth began reporting these in UNE Other Non-Design with September 2001 data) - 265 LSRs were properly excluded because they are LNP orders that appear in the appropriate BARNEY Miscellaneous Reports raw data file - 46 LSRs were properly excluded as coin (payphone) services - 78 LSRs were properly excluded because the product definition fields on the LSR could not be translated into any valid product category - 1 LSR was excluded due to a service rep error in recording the clarification date (invalid year) <p>The remaining 4 LSRs were excluded from raw data because they had not yet been mapped to an SQM-defined product category:</p> <ul style="list-style-type: none"> - 4 LSRs for Resale Centrex, which BellSouth will begin reporting in the Resale Centrex product category with May 2002 data <p>The 5 improperly excluded LSRs that have not yet been addressed by BellSouth coding changes (4 Centrex and 1 rep error) represent 0.3% of the selected records. KPMG has been advised that the update has been made and retest is possible.</p>
<p>Exc #144/ <0.5% MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth incorrectly excludes data between the BARNEY Snapshot and NODS stages of the PMAP process for non-mechanized orders that go into the calculation of the <i>Reject Interval</i> SQM reports for June 2001.</p> <p>KPMG believes that BellSouth incorrectly excluded 1,630 non-mechanized transaction records between the BARNEY Snapshot (early stage data) and PMAP NODS V (raw data) stages of the metrics data flow.</p> <p>1,610 of the 1,630 non-mechanized LSRs in question were excluded from BellSouth's raw data files for the following reasons:</p> <ul style="list-style-type: none"> - 957 LSRs were properly excluded because they are LNP orders that appear in the appropriate BARNEY Miscellaneous Reports raw data file - 373 LSRs were properly excluded as directory listings (BellSouth began reporting these in UNE Other Non-Design with September 2001 data) - 204 LSRs were properly excluded as coin (payphone) services - 62 LSRs were properly excluded because the LSR was received in the previous reporting month (BST began including LSRs received in the previous reporting month and rejected/clarified in the current reporting month with August 2001 data) - 14 LSRs were properly excluded because the product definition fields on the LSR could not be translated into any valid product category <p>20 LSRs were excluded from raw data because they had not yet been mapped to an SQM-defined product category:</p> <ul style="list-style-type: none"> - 20 LSRs for Resale Centrex or DID, which BellSouth will begin reporting in the appropriate product categories with May 2002 data <p>The 20 improperly excluded LSRs that have not yet been addressed by BellSouth coding changes (Centrex or DID) represent 1.23% of the selected records. However, BellSouth has determined that the inclusion of the missing non-mechanized Resale Centrex LSRs in December 2001 and January 2002 data would have a minimal impact on the reported results and no equity impact on the results for these data months. KPMG has been advised that the update has been made and retest is possible.</p>
<p>Exc #145/ <0.5% MSS Impact (PMR-4)</p>	<p>KPMG reported that BellSouth incorrectly excludes data between BARNEY Snapshot and NODS stages of the PMAP process that go into the calculation of the non-mechanized orders for the <i>FOC Timeliness</i> SQM reports for June 2001.</p> <p>KPMG believes that BellSouth incorrectly excluded 6,526 non-mechanized transaction records between the BARNEY Snapshot (early stage data) and PMAP NODS V (raw data) stages of the metrics data flow. Due to the large volume of LSRs identified, BellSouth selected the first 653 records in the data file provided by KPMG in order to identify the data exclusion criteria applied to each LSR.</p>

Florida Third Party Test Metrics Exceptions

Fl. Exc #/MSS Impact	Issue Description & BellSouth Comments
	<p>619 of the 653 non-mechanized LSRs in question were excluded from BellSouth's raw data files for the following reasons:</p> <ul style="list-style-type: none"> - 371 LSRs were properly excluded because they are LNP orders that appear in the appropriate BARNEY Miscellaneous Reports raw data file - 120 LSRs were properly excluded as directory listings (BellSouth began reporting these in UNE Other Non-Design with September 2001 data) - 81 LSRs were properly excluded because the FOC return timestamp was null (indicating that no FOC was, nor should have been, returned) - 22 LSRs were properly excluded as coin (payphone) services - 24 LSRs were properly excluded because the product definition fields on the LSR could not be translated into any valid product category - 1 LSR was excluded due to a service rep error in recording the FOC date <p>34 LSRs were excluded from raw data because they either had not yet been mapped to an SQM-defined product category or could not be accounted for using June 2001 business logic:</p> <ul style="list-style-type: none"> - 30 LSRs with a null FOC return timestamp are counted via new business logic implemented with August 2001 data - 4 LSRs for Resale Centrex, which BellSouth will begin reporting in the appropriate product categories with June 2002 data <p>The 5 improperly excluded LSRs that have not yet been addressed by BellSouth coding changes (4 Centrex and 1 rep error) represent 0.77% of the selected records. However, BellSouth has determined that the inclusion of the missing non-mechanized Resale Centrex LSRs in December 2001 and January 2002 data would have a minimal impact on the reported results and no equity impact on the results for these data months. KPMG has been advised that the update has been made and retest is possible.</p>
<p>Exc #151/ <0.5% MSS Impact (PMR-5)</p>	<p>KPMG Consulting reports that BellSouth cannot replicate the values in the <i>Provisioning: % Completions/Attempts without Notice or <24 Hours Notice</i> SQM report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the RDUM are insufficient for calculating the metrics values for this SQM.</p> <p>This exception is the same as GA Exception 144.</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
<p>Exc #153/ No MSS Impact (PMR-5)</p>	<p>KPMG reports that BellSouth cannot replicate the values in the LNP – Total Service Order Cycle Time SQM report for the CLEC Aggregate for May 2001. KPMG found that BellSouth’s instructions in the RDUM are insufficient for calculating the metrics values for this SQM.</p> <p>KPMG has identified issues related to deficiencies in BellSouth’s RDUM v2.1.06 replication instructions and the Florida SQM for this metric. First, KPMG noted that BellSouth’s RDUM did not address the methodology by which a user should distinguish between mechanized, partially mechanized, and non-mechanized orders. BellSouth added the required work steps to the RDUM v2.1.08 for July data. Second, KPMG noted that BellSouth’s exclusions related to Sunday and holiday hours were improperly documented in the RDUM. BellSouth removed these instructions from RDUM v 2.1.12 following the transition of the results reports for this metric from Barney to PMAP with November 2001 data. Third, KPMG noted inconsistencies between the interval buckets defined in the SQM and those applied to BellSouth’s results reports. BellSouth submitted a redlined SQM update to KPMG on December 13, 2001 to reflect the interval buckets as they appear on the SQM reports. Fourth, KPMG noted that BellSouth’s RDUM did not provide adequate instructions for calculating the average interval. Following the transition of the results reports from Barney to PMAP, BellSouth simply removed the original instructions specific to LNP-based products and pointed the user to the existing RDUM 2.2.01 calculation instructions for the other <i>Total Service Order Cycle Time</i> product categories. These documentation issues have no impact on the results reported via the MSS. Finally, BellSouth has entered a change request to correct the interval buckets in the code to match the buckets as stated in the December 2001 redlined SQM (“0-5” to “0 to <=5”, etc.)beginning with May 2002 data. None of these issues has any impact on the results reported via the MSS.</p>
<p>Exc #163 No MSS Impact (PMR-5)</p>	<p>KPMG reports that BellSouth cannot replicate the values in the LNP-Percent Rejected Service Requests SQM report for the CLEC Aggregate for Aug 2001. KPMG found that BellSouth’s instructions in the RDUM are insufficient for calculating the metrics values for this SQM.</p> <p>KPMG has identified two instances of inadequate RDUM computation instructions associated with this metric. First, KPMG noted inconsistencies in the instructions required to calculate the “Total Percent Rejected” and “Product-Specific Percent Rejected” results for this metric. Upon retest, KPMG noted additional inaccuracies. Regarding issue one, BellSouth updated the RDUM v2.2.03 to clarify the calculation instructions to ensure the two unique results could be achieved by the user, and to better distinguish product and mechanization types. Secondly, the May 2002 release of the RDUM has been updated to provide additional calculation instructions :</p> <ul style="list-style-type: none"> - fatal_ind = ‘N’ - “start_time should be greater than or equal to the first day of the prior month for which raw data is valid” (i.e., for July, create_date >= ‘01-JUN-01’) has been updated to “create_date should be greater than or equal to the first day of the prior month for which raw data is valid”(i.e., for July, create_date >= ‘01-JUN-01’).. <p>These documentation issues have no impact on the results reported via the MSS.</p>
<p>Exc #173 No MSS Impact (PMR-5)</p>	<p>KPMG reports that BellSouth cannot replicate the values in the Acknowledgment Message Timeliness and Firm Order Confirmation and Reject Response Completeness (Non-Trunks) SQM report for the Test CLEC for April 2002. KPMG found that raw data required was not included in the data set for the Test CLEC.</p> <p>KPMG was unable to replicate reported values for April 2002 Test CLEC data. A clerical error caused the raw data for Test CLEC OCNs 9992, 9993, and 9994 to be omitted from the raw data file delivered for KPMG testing. As a result, KPMG could not replicate five measures for April 2002 (the measures noted in the Exception, as well as <i>Reject Interval, Percent Rejected Service Requests, and Firm Order Confirmation Timeliness</i>). BellSouth provided KPMG with the corrected data files on June 19, 2002 and the entire raw data sets are now available on the PMAP website. This issue had no impact on the results reported via the MSS.</p>
<p>Exc #174 No MSS Impact (PMR-4)</p>	<p>KPMG reports that the values of the Completion Date field were inconsistent when comparing the legacy/source extracts to the corresponding RADS snapshots for the WFA-P (WFA-Provisioning used for PTR30) system for data used in the calculation of certain Provisioning related SQMs.</p> <p>KPMG was testing the data flow from the legacy/source systems to the RADS stage of the PMAP 4.0 process and found that the values of some records in the Completion Date field (DDCOMP) sourced from WFA-P had changed during the transfer of data between the legacy source system extracts and the RADS snapshot data. BellSouth found that the WFA-P data files that KPMG was using were from the week of February 10th to 16th. These were being compared to the monthly RADS snapshot taken at the end of the</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
	<p>month. The monthly RADS snapshot is what is used in the PMAP processing and it is possible that between the 16th of the month and the end of the month, when the snapshot is taken, the source system data is modified. In the case of the WFA-P system, the Completion Date field was appropriately altered by a service technician either in the field or a work center in 10 out of 12 records. For the remaining two records, which are non-design orders, the WFA completion date was overwritten by SOCS when the SOCS system completed the order. These source system data updates have no impact on the results reported via the MSS.</p>
<p>Exc #175 <0.5% MSS Impact (PMR-4)</p>	<p>KPMG reports that records to be used in the calculation of Ordering SQMs were being excluded between the legacy system extracts and RADS Snapshot data. This issue is covered under Georgia Draft Exception 201.</p>

Florida Third Party Test Metrics Exceptions

Exceptions Closed or in the Closure Process as of July 9, 2002

Impact	
<p>Exc #10/ No MSS Impact (PMR-5)</p>	<p>KPMG reported that BellSouth's implemented metrics calculations for the LNP - Reject Interval SQM reports are inconsistent with the documented metrics calculations for May 2000.</p> <p>KPMG has identified three issues in this exception: 1) the inappropriate truncation of response intervals, 2) coding errors in defining the "interval buckets", and 3) an inadequate Barney-to-PMAP raw data transfer process. For the first issue, KPMG could not replicate the BellSouth-reported values for May 2000 data because the Barney 4GL code that performs the interval calculations was inappropriately truncating the reject response durations to the minute. For example, the Barney code would report a reject interval of 4 minutes and 33 seconds as 4 minutes and categorize the transaction in the "0 - <=4 minute" bucket instead of the ">4 - <=8 minute" bucket. BellSouth implemented a fix to calculate response intervals to the hundredth of a second beginning with October 2001 data. For the second issue, KPMG could not match BellSouth's results for several "interval buckets" due to coding errors in defining the edges of the buckets. BellSouth corrected the majority of these issues with October 2001 data. The only remaining issue is limited to the fully mechanized ">12 - <=60min" interval bucket. This fix was implemented with April 2002 data and had no impact on the MSS results reported against the benchmark. The last issue refers to the fact that the raw data and results reports for this metric are produced in Barney and uploaded to PMAP for delivery and presentation via the website. Although both of the Barney outputs were originally correct, a deficiency in the file transfer process caused the loss of some raw data records being uploaded to PMAP. BellSouth implemented a fix for this issue beginning with October 2001 data. This issue only impacted the raw data provided. The posted metric results were correct and this exception closed on May 13, 2002.</p>
<p>Exc #15/ No MSS Impact (PMR-5)</p>	<p>KPMG cannot determine whether BellSouth is producing complete SQM reports, as ordered by the Florida Public Service Commission, for the Metrics Calculations Verification and Validation Review test due to conflicting information in the public order from the FPSC.</p> <p>KPMG noted inconsistencies between the FPSC-approved levels of disaggregation and approved benchmarks for five SQM metrics (Ordering: FOC Timeliness, Ordering: LNP- FOC Interval Distribution and FOC Average Interval, Provisioning: LNP- Average Disconnect Timeliness Interval and Disconnect Timeliness Interval Distribution, Ordering: Reject Interval (Trunks), and Ordering: Reject Intervals (Non-Mech)). BellSouth agreed with the FPSC's recommendations and implemented the necessary changes to the time bucket designations for the various SQMs. A series of fixes went in to better align the bucket designations to the established benchmarks and to keep consistency across the levels of disaggregation, effective with July 2001 data. This allowed for the levels of disaggregation to include Partially-Mech, Non-Mech, and Trunks, in addition to the Fully-Mech reported intervals. Additionally, BellSouth submitted Version 3.00 SQM, which contained the proper time bucket designations compared to the ordered benchmarks for all SQMs and submitted a red-line SQM outlining its proposed changes for the Provisioning: LNP-Disconnect Timeliness SQM. KPMG reviewed both Version 3.0 SQM and BellSouth's redline SQM and closed this exception. This documentation exception has no impact on the reported reports.</p>
<p>Exc #22/ No MSS Impact (PMR-5)</p>	<p>KPMG cannot replicate the values in the LNP Disconnect Timeliness Interval & Average Disconnect Timeliness Interval SQM report for the CLEC Aggregate for May 2000.</p> <p>KPMG identified three issues in this exception: 1) the inclusion of negative interval transactions, 2) an extraneous RDUM instruction, and 3) rounding errors in assigning transactions to the appropriate interval buckets. In response, BellSouth began excluding negative interval transactions with April 2001 data, corrected the computation instructions for the average interval with the December 2001 RDUM v.2.1.12, and resolved a minor rounding error associated with the average interval calculation (15 hrs: 12 min vs. 15 hrs: 13 min), also with December 2001 data. KPMG successfully retested this metric with December 2001 data and closed this exception on February 21, 2002. BellSouth has asked the Commission not to rely on this measure in evaluating its 271 application since the results do not measure any meaningful aspect of BellSouth's performance in this area.</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
<p>Exc #27/ <0.5% MSS Impact (PMR-5)</p>	<p>KPMG cannot replicate the values in the <i>Provisioning Troubles w/in 30 Days SQM</i> report for the CLEC Aggregate for May 2000.</p> <p>KPMG was unable to replicate the posted results for the BellSouth Retail Design analog. BellSouth identified a discrepancy of 13 trouble records (or 0.05% of total troubles) in September 2001 results and one trouble record (0.04% of total troubles) in October 2001 results. The discrepancy resulted from an incorrect date comparison as the work order completion date was used instead of the service order completion date. BellSouth corrected the code and computation instructions effective with November 2001 data and the December RDUM v.2.1.12. These issues had no impact on BellSouth's reported equity results for September and October 2001 data. KPMG successfully retested this metric with November 2001 data and this exception has been closed.</p> <p>This exception relates to GA exception 86.1, which was closed on January 9, 2002.</p>
<p>Exc #78/ No MSS Impact (PMR-3)</p>	<p>KPMG has found that BellSouth's implemented Metrics change control process is inconsistent with its documented Metrics change control process.</p> <p>KPMG found that BellSouth does not always practice some of the required steps described in the Metrics Change Control Process manual. KPMG also examined BellSouth's Team Connection database, and observed that several metrics status descriptions were recorded in the database, but were not documented in the change control documentation. BellSouth updated the document, "Change Control Using Team Connection Implemented for PMAP, Version 1.1", on July 3, 2001. KPMG reviewed the updated documentation and successfully retested the TeamConnection change request status reports after determining that all required steps, as documented, were being followed in TeamConnection. KPMG has closed this exception, and this change control process issue had no impact on the results reported via the MSS.</p>
<p>Exc #81/ No MSS Impact (PMR- 2)</p>	<p>KPMG has found that BellSouth's stated Business Rules in the Florida Interim Performance Metrics SQM document for the <i>Notification of CLEC Interface Outages SQM</i> is ambiguous.</p> <p>Specifically, KPMG believes that the following business rule is ambiguous as stated in the SQM:</p> <p><i>"This measurement is designed to notify the CLEC of interface outages within 15 minutes of BellSouth's verification that an outage has taken place."</i></p> <p>BellSouth provided KPMG with a redlined SQM with additional language clarifying the nature and definition of BellSouth's verification process, as well as the "start" and "stop" timestamps for both the 15 minute notification interval and the 20 minute outage duration. KPMG reviewed the changes proposed for the SQM and closed this exception. This documentation issue had no impact on the results reported via the MSS.</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
<p>Exc #101/ <0.5% MSS Impact in FL Only (PMR-5)</p>	<p>KPMG cannot replicate the values in the <i>Total Service Order Cycle Time</i> SQM report for the CLEC Aggregate in January 2001.</p> <p>KPMG identified two issues in this exception: 1) inappropriate inclusion of CLEC pending orders in the results calculations and 2) inappropriate inclusion of test orders in the results calculations. Regarding the first issue, KPMG identified results discrepancies due to the inclusion of pending orders in only one submetric (UNE Other – Design, <10 circuits, Dispatch). The differences between KPMG- and BellSouth-calculated results were less than 0.27% across all submetric interval buckets and only 0.05 days (14.16 days v. 14.21 days) for the average interval. BellSouth implemented the fix for this issue effective with August 2001 data. This issue had no material impact on the results reported in the MSS prior to August and no impact from August forward. For the second issue, BellSouth also identified transaction records associated with test OCNs included in Florida results calculations between October 2001 and December 2001. However, no such test transaction records were identified in the results associated with the five states involved with this application. BellSouth implemented the fix to exclude test orders from the results calculations with January 2002 data. KPMG successfully retested this metric with February 2002 data and closed this exception on May 28, 2002. This issue had no impact on the results reported via the MSS.</p>
<p>Exc #109/ <0.5% MSS Impact Obs #110 (PMR-5)</p>	<p>KPMG cannot replicate the values in the <i>Acknowledgement Message Timeliness</i> SQM report for the CLEC Aggregate for May 2001.</p> <p>KPMG identified two issues in this exception: 1) mismatched results for specific interval buckets and 2) inappropriate inclusion of transactions with negative intervals in the result calculations. KPMG failed to match BellSouth's results for several interval buckets due to an error in the code defining the buckets. As a result of rounding and incorrect bucket definitions, BellSouth was mapping transactions with intervals at the "edges" of the various bucket designations into the wrong interval buckets. BellSouth corrected the code with November 2001 data. This interval buckets coding issue had no impact on the reported performance results in the MSS. For the second issue, BellSouth identified the existence of TAG transactions with negative duration response intervals in the results calculations for November 2001 during internal replication testing. For November 2001 data, BellSouth identified 9 TAG acknowledgements with negative durations out of a total of 291,001 returned. Recalculating the results to properly exclude these negative interval transactions yields no material difference in the reported regional results for November 2001 (99.99% and equivalent to six decimal places). BellSouth also identified a single acknowledgement with a negative interval acknowledgement in each of October 2001 and December 2001 results. No acknowledgements with negative durations were identified in January or February 2002 raw data. BellSouth implemented a March 2002 fix to resolve this problem. This issue had no material impact on the results reported via the MSS and KPMG closed this exception on April 22, 2002.</p>
<p>Exc #115/ No MSS Impact (PMR-5)</p>	<p>KPMG has found that BellSouth's implemented metrics exclusions for the <i>Loop Makeup Response Time – Manual</i> SQM report for May 2001 are inconsistent with documented metrics exclusions.</p> <p>KPMG identified that while BellSouth appeared to exclude weekend days from its calculations, this exclusion was not properly documented in the June 1, 2001 Revised Florida SQM, version 3.00. BellSouth provided KPMG with a redlined SQM on October 19, 2001, reflecting the proper documentation for the weekend days exclusion. Following a review of this update, KPMG closed this exception. This documentation issue had no impact on the results reported via the MSS.</p>
<p>Exc #119/ No MSS Impact (PMR-3)</p>	<p>KPMG reported that BellSouth is not adhering to the documented metrics change control process for tracking changes in TeamConnection.</p> <p>This exception is the same as GA Draft Exception 193. KPMG closed this exception on May 8, 2002.</p>
<p>Exc #125/</p>	

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
<p><0.5% MSS Impact</p> <p>(PMR-4)</p>	<p>KPMG reported that BellSouth incorrectly includes multiple instances of the same Service Order Number in NODS for the <i>Average Completion Notice Interval (ACNI)</i> SQM for June 2001.</p> <p>This issue has the same allegations as GA Exception 147 (DE 188). KPMG identified that BellSouth incorrectly included multiple instances of the same service order number for 2,641 unique service orders and different notice intervals for 2,211 unique service order numbers in its raw data files. BellSouth corrected these problems for August 2001 data. However, these issues were reintroduced with November 2001 data (due to the implementation of additional ACNI coding changes) and KPMG identified multiple instances of the same service order number for 44,651 unique service orders, and different notice intervals for 501 unique service order numbers with November 2001 data. BellSouth has again remedied the problem with the implementation of a fix for December 2001 data. KPMG successfully retested and closed this metric with December 2001 data. This issue had no material impact on the results reported via the MSS.</p>
<p>Exc #132/ No MSS Impact</p> <p>(PMR-5)</p>	<p>KPMG cannot replicate the values in the <i>LNP - FOC Timeliness</i> SQM report for the CLEC Aggregate for July 2001.</p> <p>KPMG identified two issues in this exception: 1) an inadequate Barney-to-PMAP raw data transfer process, and 2) coding errors in defining the interval buckets. The first issue refers to the fact that the raw data and results reports for this metric are produced in Barney, and uploaded to PMAP for delivery and presentation via the website. Although both of the Barney outputs were originally correct, a deficiency in the file transfer process caused the loss of some raw data records being uploaded to PMAP. BellSouth implemented a fix for this issue beginning with October 2001 data. This issue only impacted the raw data provided. The posted metric results were correct. For the second issue, KPMG could not match BellSouth's results for two interval buckets due to coding errors. BellSouth will implement a fix with February 2002 data to ensure that the appropriate data and results are reported in these interval buckets. These interval bucket coding issues had no impact on the results reported via the MSS, and this exception has been closed.</p>
<p>Exc #135/ >0.5% MSS Impact</p> <p>(PMR-5)</p>	<p>KPMG cannot replicate the values in the <i>Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices</i> SQM report for the CLEC Aggregate for August 2001.</p> <p>This exception is the same as GA Exception 142. KPMG initiated the closure process of this exception on May 29, 2002.</p>
<p>Exc #146/ <0.5% MSS Impact in FL Only</p> <p>(PMR-5)</p>	<p>KPMG reports that BellSouth cannot replicate the values in the <i>Percent Repeat Troubles w/in 30 Days</i> SQM report for the CLEC Aggregate for August 2001.</p> <p>During KPMG retesting with November 2001 data, BellSouth identified the inappropriate inclusion of test transactions in its results calculations. BellSouth implemented the fix to exclude test lines and troubles from the results calculations beginning with December 2001 data. BellSouth's impact analysis identified no test transactions present in October 2001 data, and only 26 test transactions (or 0.004% of total troubles) present in November 2001 data. These test orders were a direct result of KPMG third party testing in Florida. BellSouth did not identify any test orders in the October through December results for Georgia or Louisiana, nor would any exist in the data for the five states filed in this application. KPMG successfully replicated these reports with December 2001 data and closed this exception. This coding issue had no impact on the results reported via the MSS outside of Florida.</p>
<p>Exc #147/ <0.5% MSS Impact in FL Only</p>	<p>KPMG reports that BellSouth cannot replicate the values in the <i>Maintenance Average Duration</i> SQM report for CLEC Aggregate for August 2001.</p> <p>This exception is the same as GA Exception 151. KPMG closed this exception on February 5, 2002.</p>

Florida Third Party Test Metrics Exceptions

FL Exc #/ MSS Impact	Issue Description & BellSouth Comments
(PMR-5)	
Exc #150/ No MSS Impact (PMR-4)	<p>KPMG reports that BellSouth incorrectly includes multiple instances of the same order in NODS for the FOC Timeliness SQM for September 2001.</p> <p>This Exception is the same as Georgia Draft Exception 189. KPMG closed this exception on March 18, 2002.</p>
Exc #152/ No MSS Impact (PMR-5)	<p>KPMG cannot replicate the values in the LNP - Percent Missed Installation Appointments SQM report for the CLEC Aggregate for May 2001.</p> <p>KPMG identified that BellSouth does not provide sufficient RDUM instructions to replicate the reports for this metric. First, KPMG noted that BellSouth's RDUM did not provide sufficient instructions to distinguish between end user and total missed appointments. BellSouth modified the January 2002 RDUM v2.2.01 to add the appropriate replication steps. KPMG also noted that BellSouth produced SQM reports for two product categories (LNP and UNE Loop w/ LNP), whereas the Florida SQM listed only one level of disaggregation (LNP). Once BellSouth transitioned the results reports for this metric from Barney to PMAP with November 2001 data, the existing RDUM replication instructions for the non-LNP <i>Percent Missed Installation Appointments</i> SQM reports became applicable to the LNP report. In addition, BellSouth removed the extraneous "UNE Loop w/ LNP" report from the PMAP website, but has not yet rolled up the entire portfolio of LNP-based products into this report. BellSouth implemented a fix for this issue and KPMG retested this metric successfully with March 2002 data. This product rollup issue is unique to the SQM reports as BellSouth reports fully disaggregated LNP-based product results in the MSS. These documentation and product rollup issues had no impact on the results reported via the MSS. This exception closed on May 8, 2002.</p>
Exc #154/ >0.5% MSS Impact in Florida Only <0.5% MSS Impact in Other States (PMR-5)	<p>KPMG reports that BellSouth cannot replicate the values in the Coordinated Customer Conversions Interval SQM report for the CLEC Aggregate for August 2001.</p> <p>KPMG identified three issues in this exception: 1) improper inclusion of pending and cancelled orders, 2) improper inclusion of test CLEC orders, and 3) incorrect documentation for interval buckets. Initially, KPMG could not replicate the BellSouth-reported results for Loop w/ LNP interval buckets and the sum total of all intervals (the denominator for the various interval buckets) due to a BellSouth coding error that included some pending and cancelled orders in the results calculations. Only 5 pending/cancelled orders out of the 2624 Loop with LNP orders (0.19%) were improperly included in the October 2001 results. BellSouth implemented a coding fix to exclude these orders beginning with November 2001 data. Following the KPMG retest of November 2001 data, BellSouth discovered a coding error that improperly included test orders in the results calculations. BellSouth identified 15 such records included in Florida results calculations between November and December 2001. The inclusion of these 15 test transactions, out of the 2685 orders in the December 2001 results calculations, yielded an impact of 0.56%. The fix to exclude test orders from the results calculations was implemented with January 2002 data. These test orders were a direct result of KPMG third party testing in Florida. BellSouth did not identify any test orders in the October through December results for any other states. KPMG also noted inconsistencies between the interval buckets defined in the SQM and those applied to BellSouth's results reports. BellSouth submitted a redlined SQM update to KPMG on December 13, 2001 to reflect the interval buckets as they appear on the SQM reports. These documentation and coding issues had no material impact on the results reported via the MSS. KPMG closed this exception on April 5, 2002.</p>

1

¹ The closed exceptions in this exhibit only include those exceptions resulting from the tests of the version 3.00 SQM adopted June 1, 2001.

DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

TABLE OF CONTENTS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

I. Analysis of Performance Measurements	2
A. Introduction	2
B. Checklist Item 1 – Interconnection	6
C. Checklist Item 2 – Unbundled Network Elements	9
D. Checklist Item 4 – Unbundled Local Loops	55
E. Checklist Item 5 – Unbundled Local Transport	83
F. Checklist Item 6 – Unbundled Local Switching	85
G. Checklist Item 7a – 911 and E911 Services	85
H. Checklist Item 7b – Directory Assistance/Operator Services	85
I. Checklist Item 10 - Access To Database & Associated Signaling	85
J. Checklist Item 11 – Number Portability	86
K. Checklist Item 14 – Resale	88
II. Summary	115
Attachments:	
1K April 2002 Florida Summary Results	
2K April 2002 Flow-Through Report	
3K April 2002 Trunk Group Performance Report	

1 **DISCUSSION OF PERFORMANCE MEASUREMENTS DATA**

2
3 **I. ANALYSIS OF PERFORMANCE MEASUREMENTS**

4
5 **A. Introduction**

6
7 Attachment 1K is the Monthly State Summary (MSS) for Florida Performance
8 Measurements for April 2002. The MSS contains 2,330 sub-metrics based on
9 the Georgia Public Service Commission (GPSC) Docket 7892-U. As shown in
10 Attachment 1K, there were 885 sub-metrics for which there was CLEC activity
11 in April 2002 and that were compared to either benchmarks or retail
12 analogues. BellSouth met or exceeded the criteria for 761 of these 885 sub-
13 metrics, or 86%.

14
15 As explained in previous updates to this Exhibit, three of the measures were
16 identified by BellSouth as having deficiencies in their calculations and were
17 investigated and evaluated for appropriate program code corrections. These
18 three measures were Average Jeopardy Notice Interval, FOC & Reject
19 Completeness (including the "Multiple Responses" sub-metrics), and LNP
20 Disconnect Timeliness. Program coding modifications have been completed
21 for the Average Jeopardy Notice Interval and FOC and Reject Completeness
22 measures. A variation on the FOC & Reject Response Completeness (O-11)

1 measurement, FOC/Reject Completeness (Multiple Responses), indicates the
2 proportion of times that multiple FOCs/Rejects for an LSR are returned. The
3 Georgia PSC did not order this measure to be implemented. Also, this
4 measurement can be misleading because sometimes multiple responses are
5 required for efficient operation of the business, such as when a second FOC
6 is returned to notify a CLEC when a jeopardy is cleared. Consequently, while
7 BellSouth reports data on this measure in the Monthly State Summary,
8 BellSouth has not included it in the calculation of performance measurements
9 that had CLEC activity and has not addressed those sub-metrics in this
10 Exhibit. The LNP Disconnect Timeliness measure is still under review by the
11 Georgia PSC. These measures are included in the MSS and in the total
12 number of measurements calculation (2,330), but are excluded from the
13 "Met/Total" (761/885) percentage calculations.

14

15 During the three-month period, February through April 2002, again adjusting
16 for the measures mentioned above where appropriate, there were a total of
17 799 sub-metrics that had CLEC activity for all three months and that were
18 compared with either benchmarks or retail analogues. Of these 799 sub-
19 metrics, 695 sub-metrics (87%) satisfied the comparison criteria in at least
20 two of the three months.

21

1 Two general issues can impact the degree to which BellSouth's performance
2 data is meaningful. First, the extreme disaggregation of the data in the
3 reports often dilutes the universe size of individual measurements, which in
4 turn reduces the confidence level of each of the individual Z-test results. As a
5 result, there are many performance measurements for which the results are
6 statistically inconclusive due to the small number of observations. Second, in
7 situations in which there are a large number of observations and the
8 difference between the means is very small, the results can be misleading
9 and not indicative of the absolute level of performance that BellSouth
10 provides to CLECs.

11
12 With respect to the first issue, in many cases, the extensive levels of
13 disaggregation leads to numerous sub-metrics with fewer than 30
14 observations, which is generally accepted as the smallest number of
15 observations for application of the Z-test. Despite this fact, BellSouth has
16 reported results for all of the measures, even those with statistically
17 inconclusive universe sizes.

18
19 The second issue arises in situations where BellSouth provides very high
20 quality service to both BellSouth's retail units and the CLECs, where there are
21 very large universe sizes, and the difference between the means is very
22 small. This scenario can cause an apparent missed condition from a

1 quantitative viewpoint. For example, in April 2002, the % Missed Installation
2 Appointments (%MIA), for Resale Residence / Non-Dispatch / < 10 Circuits
3 (A.2.11.1.1.2) showed that BellSouth retail had 0.16% missed appointments
4 for the 681,747 scheduled orders. The CLEC %MIA for the same period is
5 0.26% missed appointments for 56,111 scheduled orders. While there is very
6 little difference in the results, only one tenth of a percentage point, the
7 universe is so large that the Z-test becomes overly sensitive to any difference.
8 As a result, the statistical test shows that the sub-metric missed the standard
9 criteria, but BellSouth's actual performance is at a very high level for both the
10 CLECs and BellSouth retail, in this case, over 99.7%. From a practical point
11 of view, the CLECs' ability to compete has not been hindered, even though
12 the statistical result does not technically meet the retail analogue.

13
14 In reviewing the data, the Florida Public Service Commission (Commission)
15 should use the data as a tool in analyzing whether BellSouth has met its
16 commitments. It is not a substitute for the qualitative evaluation of
17 BellSouth's performance. The commission will still need to conduct a
18 qualitative assessment of the data that considers, among other things,
19 universe size, distributional properties of the data, as well as overall
20 performance.

21

1 Each sub-metric designated as having not satisfied the benchmark or
2 BellSouth retail analogue requirement for February, March and/or April 2002
3 is included in this Exhibit. Each sub-metric discussed is labeled as being
4 missed in any one or more of the months (February/March/April) included in
5 this filing.

6
7 The following paragraphs will address specific performance measurements
8 associated with each checklist item.

9
10 **B. CHECKLIST ITEM 1 – INTERCONNECTION**

11
12 **1. Collocation**

13 BellSouth provides three separate collocation reports: 1) Average Response
14 Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.
15 Section E in Attachment 1K, Items E.1.1.1 through E.1.3.2, provides these
16 results. BellSouth met the approved benchmarks for all 9 of the 9 sub-metrics
17 that had CLEC activity in February, for all 11 of the 11 benchmarks that had
18 CLEC activity in March and for all 10 of the 10 benchmarks that had CLEC
19 activity in April 2002.

20
21 For the three-month period, February through April 2002, there were 9 sub-
22 metrics for which there was CLEC activity in all three months and were

1 compared to retail analogues or benchmarks. All 9 of these sub-metrics met
2 the retail analogue/benchmark comparisons in all three months.

3
4 **2. Local Interconnection Trunking**

5 Trunking Reports

6 Attachment 1K, Section C, Items C.1.1 to C.4.2 of the MSS contains data for
7 ordering, provisioning, maintenance and repair, and billing associated with
8 Local Interconnection Trunks. Trunk Blocking, Item C.5.1, will be discussed
9 separately following this section.

10
11 In February BellSouth met 22 of 24 sub-metrics or 92% and in March 2002,
12 met 24 of the 25 sub-metrics or 96% of the applicable benchmarks/analogues
13 for all local interconnection trunking measures having CLEC activity. In April
14 2002, BellSouth met all 25 of the 25 sub-metrics or 100% of the
15 benchmarks/retail analogues having CLEC activity. The sub-metrics that did
16 not meet the benchmarks/retail analogues for February, March and/or April
17 2002 are as follows:

18
19 Order Completion Interval / Local Interconnection Trunks (C.2.1) (February)

20 The average order completion interval for CLEC orders for this sub-metric for
21 February was 21.96 days compared to 15.49 days for the BellSouth retail
22 analogue. The standard interval for trunk orders covered by this

1 measurement is 30 days for new trunks and 20 days for augments, and the
2 orders are managed as “projects.” The CLEC orders are meeting the due
3 dates committed to the customer, but the intervals are longer than for the
4 retail analogue. BellSouth met the retail analogue comparison for this sub-
5 metric in March and April 2002.

6
7 % Repeat Troubles within 30 Days / Local Interconnection Trunks (C.3.4.2)
8 (March)

9 In March 2002, there were only two orders for the sub-metric. The small
10 universe size does not provide a conclusive benchmark comparison.
11 BellSouth met the retail analogue comparison for this sub-metric in February
12 and April 2002.

13
14 Invoice Accuracy – Interconnection (C.4.1) (February)

15 The CLECs experienced Local Interconnection invoice accuracy rates in
16 February that were slightly less than for the invoices BellSouth sent to its
17 customers (97.86% accuracy for BellSouth versus 97.34% for the CLEC
18 invoices). The difference in performance was the result of adjustments given
19 to customers who were billed for some rate elements for which they should
20 not have been billed because of bill and keep provisions in their contracts.
21 These bill and keep rate elements were not distinguishable in the contract so
22 the corresponding rate element fields were populated with non-zero amounts
23 on the rate file. As a result, a new process was implemented which requires

1 all bill and keep rate element Universal Service Order Codes (USOCs) be
2 followed by "BK" so that the rate groups will know to zero rate these
3 elements. BellSouth met the retail analogue comparison for this sub-metric in
4 March and April 2002.

5
6 Trunk Blockage

7 BellSouth has developed a trunk blocking report that compares BellSouth
8 retail's trunk blockage rates to those of CLECs. The report, Trunk Group
9 Performance Report (TGP), Attachment 3K, displays trunk blocking in a
10 manner that accurately represents the customer experience. The TGP report
11 tabulates actual call blocking as a percentage of call attempts for all
12 comparable trunk groups administered by BellSouth that handle CLEC and
13 BellSouth traffic, and provides a direct comparison of hour-by-hour blocking
14 between CLEC and BellSouth trunk groups. The analogue/benchmark for the
15 Trunk Group Performance measure is any consecutive two-hour period in 24
16 hours where CLEC blockage exceeds BellSouth blockage by more than
17 0.5%. BellSouth met or exceeded the benchmark for this sub-metric in
18 February, March and April 2002.

19
20 **C. CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)**

21
22 This section addresses the measures associated with UNEs under checklist
23 item 2. Attachment 1K, Sections B1 – B3, provides data that is divided into

1 Ordering, Provisioning and Maintenance & Repair operations. In general, the
2 Ordering function is disaggregated into 17 sub-metrics, the Provisioning
3 function has 19 sub-metrics, and there are 12 sub-metrics for the
4 Maintenance & Repair function. All Ordering measures will be included in this
5 checklist item because of the overall relationship of the mechanized, partially
6 mechanized and manual processing of Local Service Requests (LSRs). The
7 Provisioning and Maintenance & Repair measures for the following products
8 are included in the checklist item as shown below:

9	<u>Product</u>	<u>Checklist Item:</u>
10	Combo (Loop & Port)	#2 – Unbundled Network Elements
11	Combo (Other)	#2 – Unbundled Network Elements
12	Other Design	#2 – Unbundled Network Elements
13	Other Non-Design	#2 – Unbundled Network Elements
14	xDSL Loop	#4 – Unbundled Local Loops
15	UNE ISDN Loop	#4 – Unbundled Local Loops
16	Line Sharing	#4 – Unbundled Local Loops
17	2w Analog Loop Design	#4 – Unbundled Local Loops
18	2w Analog Loop Non Design	#4 – Unbundled Local Loops
19	2w Analog Loop w/INP Design	#4 – Unbundled Local Loops
20	2w Analog Loop w/INP Non Design	#4 – Unbundled Local Loops
21	2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
22	2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops

1	Digital Loop < DS1	#4 – Unbundled Local Loops
2	Digital Loop => DS1	#4 – Unbundled Local Loops
3	Local Interoffice Transport	#5 – Unbundled Local Transport
4	Switch Ports	#6 – Unbundled Local Switching
5	INP Standalone	#11 – Local Number Portability
6	LNP Standalone	#11 – Local Number Portability

7

8 An overall review of the UNE sub-metrics for Ordering, Provisioning,
9 Maintenance & Repair and Billing indicates that BellSouth met the
10 benchmark/analogue for 84% of the sub-metrics each month for February,
11 March and April 2002.

12

13 For the three-month period, February through April 2002, there were 447 sub-
14 metrics in the UNE measurements for which there was CLEC activity in all
15 three months and that were compared to retail analogues or benchmarks. Of
16 those 447 sub-metrics, 380 sub-metrics (85%) met the retail
17 analogue/benchmark comparisons in at least two of the three months.

18

19 **1. UNE Ordering Measures**

20

21 Items B.1.1 – B.1.19 in Attachment 1K show data for Percent Rejected
22 Service Requests, Reject Interval, FOC Timeliness and FOC & Reject

1 Response Completeness. These reports are disaggregated by interface type
2 (electronic, partial electronic and manual), as well as product type.

3
4 **Reject Interval**

5 Items B.1.4 - B.1.8 in Attachment 1K examine the Reject Interval for the
6 month of April 2002. For orders submitted electronically, the benchmark is
7 97% within one hour. In February, March and April 2002, 73%, 86% and
8 84%, respectively, of all rejected electronic service requests were delivered
9 within the one-hour benchmark interval. (See the write-up below for Items
10 B.1.4.2 – B.1.4.17 for further discussion concerning electronically submitted
11 orders.)

12
13 For partially mechanized orders, which are LSRs submitted electronically but
14 requiring intervention by a BellSouth service representative, the benchmark is
15 85% returned within 10 hours. BellSouth exceeded these benchmarks in
16 February, March and April 2002, with 95%, 92% and 89%, respectively, of
17 partially mechanized rejects being returned to the CLECs within the
18 benchmark interval.

19
20 For manual orders, the current benchmark is 85% within 24 hours. BellSouth
21 also exceeded this requirement, with over 99% of the LSRs submitted

1 manually being returned to the CLECs within the 24-hour time period in each
2 of the three months.

3

4 The following sub-metrics did not meet the established benchmarks in
5 February, March and/or April 2002:

6

7 Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3)

8 (February/March/April)

9 Reject Interval / Combo Other / Electronic (B.1.4.4) (April)

10 Reject Interval / xDSL / Electronic (B.1.4.5) (April)

11 Reject Interval / UNE ISDN / Electronic (B.1.4.6) (March/April)

12 Reject Interval / Line Sharing / Electronic (B.1.4.7) (February/March/April)

13 Reject Interval / 2w Analog Loop Design / Electronic (B.1.4.8)

14 (February/March/April)

15 Reject Interval / 2w Analog Loop Non-Design / Electronic (B.1.4.9)

16 (February/March/April)

17 Reject Interval / 2w Analog Loop w/LNP Design / Electronic (B.1.4.12)

18 (February/April)

19 Reject Interval / 2w Analog Loop w/LNP Non-Design / Electronic (B.1.4.13)

20 (April)

21 Reject Interval / Other Design / Electronic (B.1.4.14) (February/March/April)

1 Reject Interval / Other Non-Design / Electronic (B.1.4.15)

2 (February/March/April)

3 The current benchmark for these sub-metrics is $\geq 97\%$ within one hour.
4 BellSouth has conducted a detailed root cause analysis of the process for
5 electronic rejects. This analysis addresses the ordering systems (EDI, TAG,
6 and LENS) used by the CLECs and the back-end legacy applications, such
7 as SOCS, that are accessed by the ordering systems. BellSouth's root cause
8 analysis determined that a number of LSRs that did not meet the one-hour
9 benchmark were submitted when back-end legacy systems were out of
10 service and were unable to process the LSRs. Because such LSRs should
11 be excluded from the measurement, BellSouth implemented a coding change
12 in PMAP, intended to ensure that scheduled OSS downtime was properly
13 excluded. The coding change assumed that EDI and TAG timestamps
14 reflected Eastern Time. However, the timestamps used by EDI and TAG
15 actually reflects Central Time. As a result of this discrepancy, an hour is
16 being added during PMAP timestamp "synchronization," which causes the
17 results to inaccurately reflect the Reject Interval duration. A change to
18 address this issue for EDI was implemented effective with February 2002
19 data, and the update for TAG was implemented effective with April 2002 data.

20 In addition to the system downtime issue, with the implementation of the
21 GPSC *January 16, 2001 Order*, BellSouth was directed to change the time

1 stamp identification for the start and complete times of the interval for this
2 measurement. The time stamp was changed from the Local Exchange
3 Ordering (“LEO”) System to the CLEC ordering interface system (TAG or
4 EDI). With this change BellSouth was temporarily unable to identify multiple
5 issues of the same version of LSRs that are fatally rejected, which should be
6 excluded from the measurement. If there are multiple issues of the same
7 version, the measure currently calculates the FOC and reject interval such
8 that BellSouth’s performance appears to be worse than it actually is. The
9 interval is calculated from the initial issue date and time of the LSR to the
10 return of a non-fatal reject or FOC. No exclusion applies for the amount of
11 time it takes the CLEC to resubmit it after it is fatally rejected. Consequently,
12 BellSouth’s performance level is inappropriately understated. BellSouth has
13 identified a fix for this issue consisting of adding a “transaction identification”
14 to each version of the LSR that will allow PMAP to properly identify the
15 beginning time stamp. The EDI system was corrected with release of
16 February data and the TAG update was implemented effective with April 2002
17 data.

18
19 BellSouth has also identified a LESOG application defect that affects the
20 Reject Interval measure. Currently, the Working Service on Premise indicator
21 is not verified prior to the FOC. If this indicator is not populated on orders for
22 additional lines, the order is manually clarified back to the CLEC during post-

1 FOC error handling. With implementation of the fix for this defect, the
2 systems will verify the Working Service on Premise indicator prior to the
3 issuance of a FOC for LSRs attempting to add additional lines. The fix for this
4 defect is scheduled for implementation with June data.

5

6 Reject Interval / xDSL / Partially Electronic (B.1.7.5) (April)

7 There were only seven LSRs rejected for this sub-metric in April 2002. The
8 small universe of orders for the month does not provide a conclusive
9 benchmark comparison for this sub-metric. BellSouth met the benchmark for
10 this sub-metric in March 2002. There was no CLEC activity for this sub-
11 metric in February 2002.

12

13 Reject Interval / UNE ISDN / Partially Electronic (B.1.7.6) (February/April)

14 There were only ten LSRs rejected for this sub-metric in February 2002. The
15 small universe of orders for the month does not provide a conclusive
16 benchmark comparison for this sub-metric. BellSouth met the benchmark
17 interval for 25 of the 32 LSRs rejected for this sub-metric in April 2002. The
18 85% benchmark required that 28 of the 32 rejects be returned in the 10-hour
19 period. BellSouth met the benchmark for this sub-metric in March 2002.

20

21 Reject Interval / Line Sharing / Partially Electronic (B.1.7.7) (February/April)

1 BellSouth met the 10-hour benchmark interval for 67 of the 83 LSRs rejected
2 in February and for 99 of the 126 LSRs rejected in April 2002. The 85%
3 benchmark required that 71 of the 83 rejects for February and 108 of the 126
4 rejects for April be returned within the benchmark interval. BellSouth met the
5 benchmark for this sub-metric in March 2002.

6

7 Reject Interval / 2w Analog Loop Design / Partially Electronic (B.1.7.8)

8 (March)

9 BellSouth met the 10-hour benchmark interval for 161 of the 190 (84.74%)
10 LSRs rejected for this sub-metric in March 2002. Normal rounding convention
11 indicates that there is no significant difference between the results for this
12 sub-metric and the benchmark. BellSouth met the benchmark for this sub-
13 metric in February and April 2002.

14

15 Reject Interval / 2w Analog Loop Non-Design / Partially Electronic (B.1.7.9)

16 (February/March/April)

17 BellSouth met the 10-hour benchmark interval for 114 of the 147 rejected
18 LSRs for this sub-metric in February, for 201 of the 283 rejected LSRs in
19 March and for 148 of the 207 rejected LSRs in April 2002. The 85%
20 benchmark required that 125 of the 147 orders for February, 241 of the 283
21 orders for March and 176 of the 207 orders for April be returned within 10

1 hours. BellSouth continues to focus on this measurement in order to improve
2 results to meet the benchmark.

3

4 Reject Interval / 2w Analog Loop w/LNP Design / Partially Electronic

5 (B.1.7.12) (February/March)

6 BellSouth met the benchmark for 220 of the 275 of the LSRs rejected in this
7 sub-metric for February and for 232 of the 288 LSRs rejected in March 2002.

8 The 85% benchmark required that 224 of the 275 rejects for February and
9 274 of the 288 rejects for March be returned within the benchmark interval.

10 BellSouth met the benchmark for this sub-metric in April 2002.

11

12 Reject Interval / 2w Analog Loop w/LNP Non-Design / Partially Electronic

13 (B.1.7.13) (February/March/April)

14 BellSouth met the benchmark for 426 of the 543 rejected LSRs for this sub-
15 metric in February, for 639 of the 840 rejected LSRs in March and for 480 of
16 the 566 rejected LSRs in April 2002. The 85% benchmark required that 462
17 of the 543 orders for February, 714 of the 840 orders for March and 482 of
18 the 566 orders for April be returned within the benchmark interval. Normal
19 rounding convention indicates that there is no significant difference between
20 the April results for this sub-metric and the benchmark. BellSouth continues
21 to focus on this measurement in order to improve results to meet the
22 benchmark.

1

2 **FOC Timeliness**

3 For LSRs submitted electronically, the benchmark is 95% of the FOCs
4 returned within 3 hours. BellSouth met the benchmark interval for 99% of the
5 electronically submitted LSRs in February and March 2002, and for over 98%
6 of the electronically submitted LSRs in April 2002. For partially mechanized
7 LSRs, the benchmark is 85% of FOCs returned within 10 hours. BellSouth
8 met the benchmark for 92%, 94% and 91% of partially electronic FOCs in
9 February, March and April 2002, respectively. For LSRs submitted manually,
10 the benchmark is 85% returned within 36 hours. BellSouth met the
11 benchmark interval for 99% of the manual LSRs submitted in all three
12 months. The sub-metrics that did not meet the benchmark in February,
13 March and/or April 2002 are as follows:

14

15 **FOC Timeliness / UNE ISDN / Electronic (B.1.9.6) (February/March)**

16 BellSouth met the 3-hour benchmark interval for 16 of the 18 FOCs returned
17 for this sub-metric in February and for 51 of the 54 FOCs returned in March
18 2002. The 95% benchmark set a requirement that all 18 of the 18 FOCs for
19 February and 52 of the 54 FOCs for March meet the interval. BellSouth met
20 the benchmark for this sub-metric in April 2002.

21

22 **FOC Timeliness / Line Sharing / Electronic (B.1.9.7) (February)**

1 BellSouth met the benchmark for 144 of the 152 LSRs (94.74%) that received
2 a FOC in February 2002. Normal rounding convention indicates that there is
3 no significant difference between the result for this sub-metric and the
4 benchmark. BellSouth met the benchmark for this sub-metric in March and
5 April 2002.

6
7 FOC Timeliness / 2w Analog Loop w/LNP Design / Electronic (B.1.9.12)
8 (April)

9 BellSouth missed the benchmark interval for only one of the eleven FOCs
10 returned for this sub-metric in April 2002. The small universe of orders for the
11 month does not provide a conclusive benchmark comparison. BellSouth met
12 the benchmark for this sub-metric in February and March 2002.

13
14 FOC Timeliness / Other Non-Design / Electronic (B.1.9.15) (April)

15 BellSouth met the benchmark interval for 6,940 (94.55%) of the 7,340 FOCs
16 returned for this sub-metric in April 2002. Normal rounding convention
17 indicates that there is no significant difference between the result for this sub-
18 metric and the benchmark. BellSouth met the benchmark for this sub-metric
19 in February and March 2002.

20
21 FOC Timeliness / xDSL / Partially Electronic (B.1.12.5) (March)

1 BellSouth met the 10-hour benchmark for 16 of the 22 FOCs returned for this
2 sub-metric in March 2002. The 85% benchmark required that 19 of the 22
3 orders be returned, based on the number of orders for this sub-metric.

4 BellSouth met the benchmark for this sub-metric in February and April 2002.

5

6 FOC Timeliness / 2w Analog Loop Design / Partially Electronic (B.1.12.8)

7 (March)

8 BellSouth met the benchmark for 271 of the 319 LSRs (84.95%) that received
9 a FOC in March 2002. Normal rounding convention indicates that there is no
10 significant difference between the result for this sub-metric and the
11 benchmark. BellSouth met the benchmark for this sub-metric in February and
12 April 2002.

13

14 FOC Timeliness / Other Design / Partially Electronic (B.1.12.14)

15 (February/March)

16 BellSouth met the 10-hour benchmark interval for 146 of the 180 FOCs
17 returned for this sub-metric in February and for 78 of the 92 FOCs returned in
18 March 2002. The 85% benchmark set requirements of 153 of the 180 orders
19 in February and 79 of the 92 orders for March, based on the quantity of
20 orders in the sub-metric. BellSouth met the benchmark for this sub-metric in
21 April 2002.

22

1 FOC Timeliness / Other Non-Design / Partially Electronic (B.1.12.15) (April)

2 BellSouth met the 10-hour benchmark interval for 3,790 (84.77%) of the 4,471
3 FOCs returned for this sub-metric in April 2002. Normal rounding convention
4 indicates that there is no significant difference between the result for this sub-
5 metric and the benchmark. BellSouth met the benchmark for this sub-metric
6 in February and March 2002.

7
8 FOC & Reject Response Completeness / xDSL / TAG / Electronic

9 (B.1.14.5.2) (April)

10 BellSouth met the benchmark standard for 208 of the 229 responses for this
11 sub-metric in April 2002. The 95% benchmark required that the criteria be
12 met for 218 of the 229 responses based on the number of orders for this sub-
13 metric. BellSouth met the benchmark for this sub-metric in February and
14 March 2002.

15
16 FOC & Reject Response Completeness / Line Sharing / TAG / Electronic

17 (B.1.14.7.2) (April)

18 BellSouth met the benchmark standard for 76 of the 85 responses for this
19 sub-metric in April 2002. The 95% benchmark required that the criteria be
20 met for 81 of the 85 responses based on the number of orders for this sub-
21 metric. BellSouth met the benchmark for this sub-metric in February and
22 March 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

FOC & Reject Response Completeness / 2w Analog Loop w/LNP Design /
EDI / Electronic (B.1.14.12.1) (April)

BellSouth met the benchmark standard for 23 of the 26 responses for this sub-metric in April 2002. The 95% benchmark required that the criteria be met for 25 of the 26 responses based on the number of orders for this sub-metric. BellSouth met the benchmark for this sub-metric in February and March 2002.

FOC & Reject Response Completeness / 2w Analog Loop w/LNP Non-Design / TAG / Electronic (B.1.14.13.2) (February)

BellSouth met the benchmark standard for 134 of the 147 responses for this sub-metric in February 2002. The 95% benchmark required that the criteria be met for 140 of the 147 responses based on the number of orders for this sub-metric. BellSouth met the benchmark for this sub-metric in March and April 2002.

FOC & Reject Response Completeness / Other Non-Design / TAG /
Electronic (B.1.14.15.2) (April)

BellSouth met the benchmark standard for 1,269 of the 1,463 responses for this sub-metric in April 2002. The 95% benchmark required that the criteria be met for 1,390 of the 1,463 responses based on the number of orders for

1 this sub-metric. BellSouth met the benchmark for this sub-metric in February
2 and March 2002.

3

4 FOC & Reject Response Completeness / Combo (Loop & Port) / EDI / Partial
5 Electronic (B.1.15.3.1) (April)

6 BellSouth met the benchmark standard for 2,075 of the 2,197 responses for
7 this sub-metric in April 2002. The 95% benchmark required that the criteria
8 be met for 2,088 of the 2,197 responses based on the number of orders for
9 this sub-metric. BellSouth met the benchmark for this sub-metric in February
10 and March 2002.

11

12 FOC & Reject Response Completeness / xDSL / EDI / Partial Electronic
13 (B.1.15.5.1) (April)

14 BellSouth met the benchmark standard for 30 of the 40 responses for this
15 sub-metric in April 2002. The 95% benchmark required that the criteria be
16 met for 38 of the 40 responses based on the number of orders for this sub-
17 metric. BellSouth met the benchmark for this sub-metric in February and
18 March 2002.

19

20 FOC & Reject Response Completeness / xDSL / TAG / Partial Electronic
21 (B.1.15.5.2) (April)

1 BellSouth met the benchmark standard for 33 of the 50 responses for this
2 sub-metric in April 2002. The 95% benchmark required that the criteria be
3 met for 48 of the 50 responses based on the number of orders for this sub-
4 metric. BellSouth met the benchmark for this sub-metric in February and
5 March 2002.

6
7 FOC & Reject Response Completeness / LNP (Standalone) / EDI / Partial
8 Electronic (B.1.15.17.1) (April)

9 BellSouth met the benchmark standard for 1,612 of the 1,719 responses for
10 this sub-metric in April 2002. The 95% benchmark required that the criteria
11 be met for 1,634 of the 1,719 responses based on the number of orders for
12 this sub-metric. BellSouth met the benchmark for this sub-metric in February
13 and March 2002.

14
15 FOC & Reject Response Completeness / Local Interoffice Transport / Manual
16 (B.1.16.2) (March/April)

17 BellSouth met the benchmark standard for 66 of the 71 responses for this
18 sub-metric in March and for 96 of the 105 responses returned in April 2002.
19 The 95% benchmark required that the criteria be met for 68 of the 71
20 responses in March and for 100 of the 105 responses in April, based on the
21 number of orders for this sub-metric. BellSouth met the benchmark for this
22 sub-metric in February 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

FOC & Reject Response Completeness / Combo (Loop & Port) / Manual
(B.1.16.3) (March/April)

BellSouth met the benchmark standard for 1,357 of the 1,473 responses for this sub-metric March and for 1,437 of the 1,520 responses returned in April 2002. The 95% benchmark required that the criteria be met for 1,400 of the 1,473 responses in March and for 1,444 of the 1,520 responses returned in April, based on the number of orders for this sub-metric. Normal rounding convention indicates that there is no significant difference between the April result for this sub-metric and the benchmark. BellSouth met the benchmark for this sub-metric in February 2002.

FOC & Reject Response Completeness / 2w Analog Loop w/INP Design /
Manual (B.1.16.10) (April)

There were only seven responses returned for this sub-metric in April 2002. The small universe of orders for the month does not provide a conclusive benchmark comparison. BellSouth met the benchmark for this sub-metric in February 2002. There was no CLEC activity for this sub-metric in March 2002.

FOC & Reject Response Completeness / 2w Analog Loop w/INP Non-Design
/ Manual (B.1.16.11) (March/April)

1 BellSouth met the benchmark standard for 13 of the 14 responses for this
2 sub-metric in March and for 8 of the 10 responses returned in April 2002. The
3 95% benchmark required that the criteria be met for all 14 of the 14
4 responses for March and for all 10 of the 10 responses for April. BellSouth
5 met the benchmark for this sub-metric in February 2002.

6
7 FOC & Reject Response Completeness / INP (Standalone) / Manual
8 (B.1.16.16) (April)

9 BellSouth met the benchmark standard for 51 of the 60 responses for this
10 sub-metric in April 2002. The 95% benchmark required that the criteria be
11 met for 57 of the 60 responses, based on the number of orders for this sub-
12 metric. BellSouth met the benchmark for this sub-metric in February and
13 March 2002.

14
15 Flow-Through

16
17 Attachment 1K, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated
18 by customer type and for the Summary/Aggregate. Detailed flow-through
19 results for individual CLECs are included in Attachment 2K. The following
20 table shows the Regional Flow-Through results for February, March and April
21 2002 as compared with the Interim SQM benchmarks.

22

1 % Flow-through Service Requests (F.1.1.1 – F.1.3.4)

<u>Customer Type</u>	<u>February 2002</u>	<u>March 2002</u>	<u>April 2002</u>	<u>Benchmark</u>
Residence	87.17%	86.49%	87.39%	95%
Business	75.20%	73.55%	71.89%	90%
UNE	84.86%	83.88%	84.78%	85%
LNP	94.12%	92.25%	92.59%	85%

2

3 The table above excludes those LSRs designed to “fall out” for manual
 4 handling. The business flow-through rate is well below the 90% objective.
 5 Business LSRs are more complex than the typical LSRs and, as a result,
 6 there is a greater probability for error. For example, an LSR requesting 10
 7 lines with series completion hunting that are located over multiple floors and
 8 have a variation of features on the lines presents many more opportunities for
 9 system mismatches than one that adds just lines and features.

10

11 BellSouth has established a Flow-Through Improvement Program
 12 Management process that includes seven different internal organizations.
 13 Ongoing analysis is being done to determine trends and identify flow-through
 14 problems. To date, fifteen system enhancements have been identified and
 15 are targeted for Encore releases. Three of the enhancements were
 16 implemented in August 2001, five enhancements implemented in November

1 2001 and two enhancements implemented in January 2002. The remainder
2 of the enhancements are scheduled for release during 2002.

3
4 **2. UNE Provisioning Measures**

5 BellSouth met 82% of the overall UNE Provisioning measurements in the
6 month of February, 84% of these measurements in March and 87% in April
7 2002.

8
9 The following sub-metrics did not meet the applicable retail analogues in the
10 months of February, March and/or April 2002:

11
12 **Order Completion Interval / Combo (Loop & Port) / < 10 Circuits / Switch**
13 **Based Orders (B.2.1.3.1.3) (February/March)**

14 This sub-metric is a further disaggregation of Item B.2.1.3.1.2. The
15 completion interval difference between the CLEC result and the result for the
16 BellSouth retail analogue for this sub-metric was less than 0.01 days in each
17 of the two months. Both measures were approximately one-third day. This
18 indicates virtually identical service for both the CLECs and the retail analogue
19 for each month. BellSouth met the retail analogue for this sub-metric in April
20 2002.

1 Order Completion Interval / Combo Other / < 10 Circuits / Dispatch

2 (B.2.1.4.1.1) (February/March/April)

3 The primary factor for the miss in this sub-metric is that the standard
4 installation interval for this product is 10 days. This is much longer than for
5 the retail analogue product. Even though the committed dates to the
6 customer are being met, the intervals are longer than for the retail analogue
7 product.

8
9 Order Completion Interval / Other Non-Design / < 10 Circuits / Dispatch

10 (B.2.1.15.1.1) (March/April)

11 In March 2002, 23 of the 35 CLEC orders for this sub-metric carried a
12 standard installation interval of 5 days. This interval is longer than the
13 “available in 3 days” standard set for the retail analogue. In April 2002, two
14 factors contributed toward the miss for this sub-metric. There were a large
15 number of very short duration BellSouth “record only” orders that should have
16 been excluded from the measure. These orders caused the retail analogue
17 result to be artificially low. In addition, the standard interval for CLEC orders
18 in this sub-metric is longer than the standard interval for most of the orders
19 that make up the retail analogue. BellSouth met the retail analogue
20 comparison for this sub-metric in February 2002.

21

1 Order Completion Interval / Other Non-Design / < 10 Circuits / Non-Dispatch

2 (B.2.1.15.1.2) (March)

3 There were 26 orders completed for this sub-metric in March 2002. The
4 average completion interval for the CLEC orders was 1.9 days compared to .9
5 days for the retail analogue. No systemic installation issues were identified
6 for the orders in this sub-metric. BellSouth met the retail analogue
7 comparison for this sub-metric in February and April 2002.

8
9 % Jeopardies / Combo Other (B.2.5.4) (February/March/April)

10 There were nine orders for this sub-metric placed in jeopardy status in
11 February, four orders placed in jeopardy in March and one order placed in
12 jeopardy in April 2002. All of these jeopardy situations were resolved prior to
13 the order due dates and were completed as scheduled.

14
15 % Jeopardy Notice >= 48 Hours / Combo (Loop & Port) / Electronic (B.2.10.3)

16 (February/April)

17 BellSouth met the 48-hour benchmark for 17 of the 18 jeopardy notices for
18 this sub-metric in February and for 35 of the 41 notices in April 2002. The
19 95% benchmark required that all 18 of 18 notices for February and 39 of 41
20 notices for April meet the 48-hour interval. BellSouth met the retail analogue
21 comparison for this sub-metric in March 2002.

22

1 % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /

2 Dispatch (B.2.18.3.1.1) (March)

3 BellSouth missed 46 of the 998 scheduled appointments in this sub-metric for
4 March 2002. BellSouth is investigating the data underlying this sub-metric to
5 determine the accuracy of the apparent disparity with the retail analogue in
6 March. BellSouth met the retail analogue comparison for this sub-metric in
7 February and April 2002.

8
9 % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /

10 Non-Dispatch (B.2.18.3.1.2) (February/March/April)

11 BellSouth missed 29 of the 12,390 scheduled appointments for this sub-
12 metric in February, missed 48 of the 20,137 appointments for March and
13 missed 48 of the 24,127 appointments for April 2002. BellSouth met over
14 99% of the scheduled appointments for both retail and CLEC orders in this
15 sub-metric for all three months. When BellSouth provisions high quality
16 service coupled with very large universe sizes, it can cause an apparent out
17 of equity condition from a quantitative viewpoint. In these cases, there is
18 very little variation and the universe size is so large that the Z-test becomes
19 overly sensitive to any difference. In other words, the statistical test shows
20 that the measurement does not meet the fixed critical value when compared
21 with the retail analogue, but BellSouth's actual performance for both CLECs
22 and its own retail operations is at a very high level – in this case over 99%.

1 From a practical point of view, the CLECs' ability to compete has not been
2 hindered even though the statistical results may technically show that
3 BellSouth failed to meet the benchmark/analogue.

4
5 % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /
6 Switch Based Orders (B.2.18.3.1.3) (February)

7 This is a further disaggregation of Item B.2.18.3.1.2, above. BellSouth
8 missed only 1 of the 6,007 appointments in this sub-metric scheduled for
9 February 2002. BellSouth met over 99% of the scheduled appointments for
10 both retail and CLEC orders in this sub-metric for the month. When BellSouth
11 provisions high quality service coupled with very large universe sizes, it can
12 cause an apparent out of equity condition from a quantitative viewpoint. In
13 these cases, there is very little variation and the universe size is so large that
14 the Z-test becomes overly sensitive to any difference. In other words, the
15 statistical test shows that the measurement does not meet the fixed critical
16 value when compared with the retail analogue, but BellSouth's actual
17 performance for both CLECs and its own retail operations is at a very high
18 level – in this case over 99%. From a practical point of view, the CLECs'
19 ability to compete has not been hindered even though the statistical results
20 may technically show that BellSouth failed to meet the benchmark/analogue.
21 BellSouth met the retail analogue comparison for this sub-metric in March and
22 April 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

% Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits / Dispatch In (B.2.18.3.1.4) (February/March)

This is a further disaggregation of Item B.2.18.3.1.2, above. BellSouth missed 28 of the 6,383 appointments for this sub-metric scheduled in February and missed 49 of the 9,201 appointments scheduled for March 2002. BellSouth completed over 99% of the appointments as scheduled in February and March 2002. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in April 2002.

% Missed Installation Appointments / Other Non-Design / < 10 Circuits / Non-Dispatch (B.2.18.15.1.2) (March)

BellSouth missed 2 of the 29 installation appointments scheduled for this sub-metric in March 2002. No systemic installation issues or patterns were identified for these two missed appointments. BellSouth met the retail analogue comparison for this sub-metric in February and April 2002.

% Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits / Dispatch (B.2.19.3.1.1) (February)

1 There were 57 troubles reported for this sub-metric in February 2002 for the
2 779 orders completed in the prior 30 days. Of the 57 total reports, 18 reports
3 were closed to "no trouble found." Without these reports, the CLEC measure
4 would have been better than for the retail analogue. BellSouth met the retail
5 analogue comparison for this sub-metric in March and April 2002.

6
7 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /
8 Dispatch In (B.2.19.3.1.1) (February)

9 There were 358 troubles reported for this sub-metric in April 2002 for the
10 9,252 orders completed in the prior 30 days. The trouble rate for this sub-
11 metric for April was only 0.3% higher for CLEC orders than for the orders for
12 the retail analogue. For very large universes of orders, the statistical test
13 becomes overly sensitive to small percentage differences in results.

14 BellSouth met the retail analogue comparison for this sub-metric in February
15 and March 2002.

16
17 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / >= 10 Circuits /
18 Dispatch (B.2.19.3.2.1) (February)

19 There were only 4 troubles reported for this sub-metric in February 2002.

20 There were no patterns or systemic installation issues identified for these 4
21 reports. BellSouth met the retail analogue comparison for this sub-metric in
22 March and April 2002.

1

2 % Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch
3 (B.2.19.4.1.1) (February/March)

4 BellSouth is currently checking the data for this sub-metric to verify that the
5 appropriate trouble reports are being included in the measurement. Of the 11
6 troubles reported for March, 4 reports (36%) were closed as “no trouble
7 found.” BellSouth met the retail analogue comparison for this sub-metric in
8 April 2002.

9

10 % Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch
11 In (B.2.19.4.1.4) (February)

12 BellSouth is currently checking the data for this sub-metric to verify that the
13 appropriate trouble reports are being included in the measurement. There
14 was no CLEC activity for this sub-metric in either March or April 2002.

15

16 % Provisioning Troubles w/i 30 Days / Other Design / < 10 Circuits / Dispatch
17 (B.2.19.14.1.1) (February)

18 There were only 2 troubles reported for the 20 orders completed in the 30
19 days prior to February 2002 for this sub-metric. No patterns or systemic
20 installation issues were identified for the two troubles. BellSouth met the
21 retail analogue comparison for this sub-metric in March and April 2002.

22

1 % Provisioning Troubles w/i 30 Days / Other Non-Design / < 10 Circuits /

2 Non-Dispatch (B.2.19.15.1.2) (February)

3 There were only five orders completed for this sub-metric in the 30 days prior
4 to February 2002. The small universe of orders for this sub-metric does not
5 provide a statistically conclusive comparison to the retail analogue. BellSouth
6 met the retail analogue comparison for this sub-metric in March and April
7 2002.

8
9 Average Completion Notice Interval / Combo (Loop & Port) / < 10 Circuits /

10 Dispatch In (B.2.21.3.1.4) (February)

11 The difference between the average notice intervals for CLECs and the retail
12 analogue for this sub-metric in February 2002 was less than 10 minutes. The
13 root cause analysis of this measure indicated that the only differences
14 between the performance between BellSouth retail and CLECs are the
15 mismatches found when the orders are compared with the original LSRs.
16 The start of the completion interval is the point at which the technician
17 completes the order, and the interval ends when the completion notice is
18 sent. Any change to a name, number of items, etc., occurring during the
19 provisioning process will generate inconsistencies with the original LSRs that
20 must be resolved before a final completion notice can be sent. Any time to
21 resolve these inconsistencies with the original LSRs is included in the
22 average. Because of numerous CLEC changes and order updates,

1 mismatches on CLECs orders exceed those for BellSouth retail orders.
2 Combining this with the smaller base for the CLECs' measurement raises the
3 average, which results in a miss. Specific Service Representatives within the
4 Work Management Centers have been assigned to resolve any completion
5 issues that are required. Providing specific training and dedicating personnel
6 to this task should reduce the difference between the CLEC and retail
7 analogue results. BellSouth met the retail analogue comparison for this sub-
8 metric in March and April 2002.

9
10 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Dispatch

11 (B.2.34.1.2.1) (February)

12 In February 2002, BellSouth met the standard criteria for 27 of the 29 orders
13 (93.10%) reviewed. The 95% benchmark set a requirement that 28 of the 29
14 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
15 March and April 2002.

16
17 Service Order Accuracy / Loops Non-Design / >= 10 Circuits / Dispatch

18 (B.2.34.2.2.1) (April)

19 In April 2002, BellSouth met the standard criteria for 97 of the 108 orders
20 reviewed. The 95% benchmark set a requirement that 103 of the 108 orders
21 meet the criteria. BellSouth met the benchmark for this sub-metric in
22 February and March 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

3. UNE Maintenance and Repair (M&R) Measures

BellSouth met the applicable performance standard for 83% in February, 82% in March and 87% in April 2002 of the overall UNE M&R measurements. The sub-metrics that did not meet the fixed critical value for this checklist item in February, March and/or April 2002 are as follows:

% Missed Repair Appointments / Combo (Loop & Port) / Non-Dispatch
(B.3.1.3.2) (March/April)

BellSouth completed 1,690 of the 1,720 repair appointments as scheduled for this sub-metric in March and met 1,910 of the 1,953 appointments as scheduled for April 2002. This represented an approximately 98% completion rate for the two months. There were no systemic maintenance issues identified for the missed appointments. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in February 2002.

% Missed Repair Appointments / Other Design / Dispatch (B.3.1.10.1)
(February)

1 BellSouth completed 13 of the 15 repair appointments as scheduled for this
2 sub-metric in February 2002. There were no systemic maintenance problems
3 identified for the two missed appointments. BellSouth met the retail analogue
4 comparison for this sub-metric in March and April 2002.

5
6 % Missed Repair Appointments / Other Non-Design / Dispatch (B.3.1.11.1)
7 (April)

8 BellSouth completed 13 of the 19 repair appointments as scheduled for April
9 2002. There were no patterns or systemic maintenance issues identified for
10 the 6 missed due dates. BellSouth met the retail analogue comparison for
11 this sub-metric in February and March 2002.

12
13 % Missed Repair Appointments / Other Non-Design / Non-Dispatch
14 (B.3.1.11.2) (March)

15 BellSouth missed only 2 of the 51 repair appointments scheduled for this sub-
16 metric in March 2002. No systemic problems or patterns were identified for
17 the missed appointments. BellSouth met the retail analogue comparison for
18 this sub-metric in February and April 2002.

19
20 Customer Trouble Report Rate / Combo Other / Dispatch (B.3.2.4.1)
21 (February/March/April)

1 There were a total of 34 trouble reports for this sub-metric for the 1,434 lines
2 in service in February, 34 trouble reports for the 1,527 lines in service in
3 March and 32 troubles reported for the 1,597 lines in service in April 2002.
4 Both the CLECs and BellSouth retail customers received more than 97%
5 trouble free service for three-month period. From a practical point of view, the
6 CLECs' ability to compete has not been hindered even though the statistical
7 results may technically show that BellSouth failed to meet the
8 benchmark/analogue.

9
10 Customer Trouble Report Rate / Combo Other / Non-Dispatch (B.3.2.4.2)
11 (February)

12 There were a total of 36 trouble reports for this sub-metric for the 1,434 lines
13 in service in February 2002. Of the 36 total trouble reports, 19 (53%) were
14 closed to "no trouble found." Both the CLECs and BellSouth retail customers
15 received more than 97% trouble free service for the month. From a practical
16 point of view, the CLECs' ability to compete has not been hindered even
17 though the statistical results may technically show that BellSouth failed to
18 meet the benchmark/analogue. BellSouth met the retail analogue
19 comparison for this sub-metric in March and April 2002.

20
21 Customer Trouble Report Rate / Other Design / Dispatch (B.3.2.10.1)
22 (February/March)

1 The difference between the results for the retail analogue and the CLEC
2 aggregate was 1.2% or less in February and March 2002. Both the CLECs
3 and BellSouth retail had greater than 98% trouble free service for all in
4 service lines in this sub-metric in both months. Of the 15 total troubles
5 reported in February 2002, 40% were closed as "no trouble found," indicating
6 minimal impact on the customer. In March, 5 of the 13 total trouble reports
7 were the result of one facility problem in one central office. From a practical
8 point of view, the CLECs' ability to compete has not been hindered even
9 though the statistical results may technically show that BellSouth failed to
10 meet the benchmark/analogue. BellSouth met the retail analogue
11 comparison for this sub-metric in April 2002.

12

13 Customer Trouble Report Rate / Other Non-Design / Dispatch (B.3.2.11.1)
14 (February/March/April)

15 There were a total of 71 trouble reports for the 619 in service lines for this
16 sub-metric in February, 67 trouble reports for the 590 lines in service in March
17 and 19 trouble reports for the 592 lines in service in April 2002. Although
18 there was significant improvement in the CLEC results in April, continuing
19 analysis is underway to determine if any systemic issues or data reporting
20 problems exist with this sub-metric.

21

1 Customer Trouble Report Rate / Other Non-Design / Non-Dispatch

2 (B.3.2.11.2) (February/March)

3 There were a total of 46 troubles reports for the 619 in service lines for this
4 sub-metric in February and 51 troubles reported for the 590 in service lines
5 for March 2002. An analysis revealed 26 of the 46 reports (57%) for February
6 and 25 of the 51 trouble reports (49%) for March 2002 were closed out as “no
7 trouble found,” or about half of the troubles reported had minimal impact on
8 the end-user customer. BellSouth met the retail analogue comparison for this
9 sub-metric in April 2002.

10
11 Maintenance Average Duration / Other Non-Design / Dispatch (B.3.3.11.1)

12 (April)

13 There were 19 repair orders completed for this sub-metric in April 2002. The
14 average interval for these orders was 33.42 hours compared to 15.58 hours
15 for the retail analogue. The six repair orders that had missed repair
16 appointments caused the average duration to be extended longer than for the
17 retail analogue. BellSouth met the retail analogue for this sub-metric in
18 February and March 2002.

19
20 Out of Service > 24 Hours / Other Design / Dispatch (B.3.5.10.1) (February)

21 There were two service affecting trouble reports for this sub-metric in
22 February 2002 that caused service outages longer than 24 hours. Neither of

1 these outages revealed a systemic maintenance process issue. BellSouth
2 met the retail analogue comparison for this sub-metric in March and April
3 2002.

4
5 Out of Service > 24 Hours / Other Non-Design / Dispatch (B.3.5.11.1)

6 (March/April)

7 There were 10 trouble reports out of service longer than 24 hours for this sub-
8 metric in March and 4 reports out of services longer than 24 hours in April
9 2002. Of the 10 March outages, 6 were from the same customer and were
10 received on Friday but not cleared until Monday. There were no patterns or
11 systemic maintenance issues identified for the 4 orders out of service longer
12 than 24 hours in April 2002. BellSouth met the retail analogue comparison for
13 this sub-metric in February 2002.

14
15 UNE – Billing

16
17 Mean Time to Deliver Invoices – CRIS / Region (B.4.2)

18 (February/March/April)

19 This metric measures the mean interval for timeliness of billing records
20 delivered to CLECs. The CLECs experienced UNE invoice delivery rates that
21 were higher than the rates for BellSouth's retail customers during February,
22 March and April 2002 (3.64 days for BellSouth versus 6.13 for CLECs in

1 February, 3.68 days for BellSouth compared to 7.51 days for CLECs in March
2 and 3.86 days for BellSouth compared to 4.97 days in April). The difference
3 in performance in all three months was the result of bill period delays
4 encountered with BellSouth's billing system upgrade associated with UNE
5 CLEC bills and usage volumes. Processing cycles ran longer than expected.
6 BellSouth is currently working on enhancements that will decrease processing
7 time and speed the delivery of bills that will help to improve performance for
8 this metric.

9
10 **4. Other UNE Measures**

11
12 **Pre-Ordering**

13 Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1) and
14 Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering
15 measurements. BellSouth met the benchmarks for all four of the sub-metrics
16 for these measurements in February and March 2002. The sub-metrics that
17 did not meet the benchmarks in April 2002 are as follows:

18
19 **Loop Makeup Inquiry (Manual) (F.2.1) (April)**

20 There were only two inquiries for this sub-metric in April 2002. The small
21 universe of orders does not provide a conclusive benchmark comparison.
22 BellSouth met the benchmark for this sub-metric in February and March 2002.

1

2 Loop Makeup Inquiry (Electronic) (F.2.2) (April)

3 BellSouth met the 1-minute response time benchmark for 2,857 of the 3,212
4 inquiries for this sub-metric in April 2002. The 95% benchmark set a
5 requirement of 3,051 of the 3,212 responses returned within the 1-minute
6 interval. BellSouth met the benchmark for this sub-metric in February and
7 March 2002.

8

9 Operations Support Systems (OSS)

10

11 The OSS/Preordering measures for which BellSouth did not meet the
12 benchmark/retail analogue in February, March and/or April 2002 were:

13

14 Average Response Interval / CRSECSRL / ROS / Region (D.1.3.5.2)

15 (February)

16 The CLECs received slightly longer response times from this system in
17 February 2002 than for the retail analogue standard (3.77 seconds average
18 for CLECS compared to 3.11 seconds for BellSouth). BellSouth met the retail
19 analogue comparison for this sub-metric in March and April 2002.

20

21 Average Response Interval / CRIS / Region (D.2.4.1.) (February/March)

1 The average response interval for this sub-metric is measured in three
2 separate disaggregations -- the percentage of queries that are responded to
3 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
4 The average response interval for the CLEC requests did not meet the retail
5 analogue intervals for the less than 4-second disaggregation but exceeded
6 both the less than 10 and greater than 10 seconds responses. For the 4-
7 second interval, there was only approximately 1% difference between the
8 CLEC responses as compared with the retail analogue in both months. Both
9 the CLECs and the retail analogue received approximately 99% or more
10 responses within the less than 10 second interval. Similarly, for the greater
11 than 10 seconds interval measure, the CLECs and the BellSouth retail
12 analogue received approximately 1% or less of responses in over 10
13 seconds. These very small differences in response intervals indicate
14 equivalent service levels for the CLECs and BellSouth retail. BellSouth met
15 the retail analogue comparison for this sub-metric in April 2002.

16

17 Average Response Interval / DLR / Region (D.2.4.3) (February/March/April)

18 The average response intervals for these sub-metrics are measured in three
19 separate disaggregations -- the percentage of queries that are responded to
20 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
21 BellSouth missed the standard for percentage of queries responded to in less
22 than 4 seconds during February, March and April 2002, but met the standards

1 for both the “less than 10 seconds” and “greater than ten seconds” intervals.
2 Even though BellSouth technically missed the standard the difference in
3 performance for the CLECs versus BellSouth’s retail analogue was only 2.4%
4 in February, 1.9% in March and 1.7% in April. There is no evidence of
5 disparate performance for this sub-metric.

6

7 Average Response Interval / LMOS / Region (D.2.4.4) (April)

8 The average response intervals for this sub-metric is measured in three
9 separate disaggregations -- the percentage of queries that are responded to
10 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

11 BellSouth missed the standard for percentage of queries responded to in less
12 than 4 seconds during April 2002, but met the standards for both the “less
13 than 10 seconds” and “greater than ten seconds” intervals. Even though
14 BellSouth technically missed the standard, the difference in performance for
15 the CLECs versus BellSouth’s retail analogue was 0.04% in April. There is
16 no evidence of disparate performance for this sub-metric.

17

18 Average Response Interval / LMOSupd / Region (D.2.4.5, D.2.5.5, D.2.6.5)

19 (February/March/April)

20 The average response interval for this sub-metric is measured in three
21 separate disaggregations -- the percentage of queries that are responded to
22 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

1 For each of the three sub-metrics, there was approximately a 10% or less
2 difference in the percentage of responses received by the CLECs and by
3 BellSouth retail customers in each month, February through April 2002.
4 Differences of 10%, or less, for these intervals indicate virtually equivalent
5 service levels for both the CLECs and BellSouth retail.

6

7 Average Response Interval / LNP/ Region (D.2.4.6) (March/April)

8 Average Response Interval / LNP/ Region (D.2.5.6, D.2.6.6) (March)

9 The average response interval for this measurement is measured in three
10 separate disaggregations -- the percentage of queries that are responded to
11 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
12 In April 2002, the average response interval for the CLEC requests did not
13 meet the retail analogue interval for the less than 4-second disaggregation
14 but exceeded the less than 10 and greater than 10 seconds responses. In
15 both March and April the "less than 4 second" and "less than 10 second"
16 measures for both BellSouth retail and for CLECs was over 99%. The
17 "greater than 10 second" measure for both BellSouth retail and for CLECs
18 was less than 0.5%. These performance results also indicate virtually
19 equivalent service being provided for the CLECs and BellSouth retail.

20

21 Average Response Interval / OSPCM / Region (D.2.4.8) (March/April)

22 Average Response Interval / OSPCM / Region (D.2.5.8) (April)

1 Average Response Interval / OSPCM / Region (D.2.6.8) (April)

2 The average response interval for these sub-metrics is measured in three
3 separate disaggregations -- the percentage of queries that are responded to
4 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
5 In March 2002, the CLEC response interval for the "less than, or equal to 4
6 seconds" measure was 13.59% compared to 23.94% for the retail analogue.
7 In April the CLECs had 20.73% of responses in less than 4 seconds
8 compared to 27.25% for the retail analogue. For both the "less than, or equal
9 to 10 seconds" measure and the "greater than 10 seconds" measures, the
10 April CLEC results were within 2.5% of the results for the retail analogue.
11 BellSouth met the retail analogue comparison for all three of the sub-metrics
12 in this measure for February 2002 and two out of three in March 2002.

13
14 Average Response Interval / NIW / Region (D.2.4.11) (March/April)

15 The average response interval for this sub-metric is measured in three
16 separate disaggregations -- the percentage of queries that are responded to
17 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
18 In both March and April 2002, the average response interval for the CLEC
19 requests did not meet the retail analogue intervals for the less than 4-second
20 disaggregation but exceeded both the less than 10 and greater than 10
21 seconds responses. The CLEC response interval was 81.81% within 4
22 seconds in March, as compared with 82.97% for the retail analogue, and

1 83.15% within 4 seconds in April, as compared to 84.36% for the retail
2 analogue. The small difference between the CLEC and retail analogue
3 results should not impede the CLECs' ability to compete in this area.
4 BellSouth met the retail analogue comparison for this sub-metric in February
5 2002.

6
7 **General – Maintenance Center**

8 **Average Answer Time / Region (F.5.1) (February)**

9 BellSouth missed the retail analogue comparison for this measure in February
10 2002 but met the retail analogue comparison for both March and April 2002.

11
12 **General – Billing**

13 **Usage Data Delivery Accuracy (F.9.1) (February)**

14 This measure compares the rate at which error-free usage data is sent to
15 CLECs with the same measure for the BellSouth retail analog. The CLECs
16 experienced usage data delivery accuracy rates that were slightly lower than
17 the rates for BellSouth customers during February 2002 (99.85% for
18 BellSouth versus 99.62% for CLECs). The difference in performance was the
19 result of a problem with ODUF pack sequence numbers. This problem did
20 not involve any missing or incorrect usage data from ODUF. The problem
21 only involved ODUF pack sequence numbers which normally go in sequence
22 from '01' to '99' for each customer. After a system problem occurred with the

1 output sequence table on February 19, 2002, the sequence numbers were
2 inadvertently restarted to '01' on all ODUFs for all CLECs. The sequence
3 table was corrected, and the correct pack number for each customer was
4 restarted on February 22, 2002. All CLECs, who questioned BellSouth about
5 this problem, reported that they understood that no usage data was actually
6 missing or incorrect as a result of the problem, and none of the CLECs
7 requested that BellSouth retransmit any ODUF data. Bellsouth met the retail
8 analogue comparison for this sub-metric in March and April 2002.

9
10 Usage Data Delivery Timeliness (F.9.2) (March)

11 This measure tracks the percentage of usage data delivered within six
12 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs
13 experienced usage data delivery timeliness rates that were slightly lower than
14 the rates for BellSouth customers during March 2002 (98.37% for BellSouth
15 compared to 93.11% for CLECs). The difference in performance for March
16 was the result of bill period delays encountered with BellSouth's billing system
17 upgrade associated with UNE CLEC bills and usage volumes. Processing
18 cycles ran longer than expected. BellSouth is currently working on
19 enhancements that will decrease processing time and speed the delivery of
20 bills that will help to improve performance for this metric. BellSouth met the
21 retail analogue comparison for this sub-metric in February and April 2002.

22

1 Usage Data Delivery Completeness (F.9.3) (April)

2 This metric provides a percentage of complete and accurately recorded
3 usage data processed and transmitted to the CLEC with within thirty (30)
4 days of the message recording date. The CLECs experienced usage data
5 delivery completeness rates that were less than the rates for BellSouth's retail
6 customers during April 2002 (99.77% for BellSouth versus 99.54% for
7 CLECs). The difference in performance was the result of bill period delays
8 encountered with BellSouth's billing system upgrade associated with UNE
9 CLEC bills and usage volumes. Processing cycles ran longer than expected.
10 BellSouth is currently working on enhancements that will decrease processing
11 time and speed the delivery of bills that will help to improve performance for
12 this metric. BellSouth met the retail analogue for this sub-metric in February
13 and March 2002.

14
15 Non-Recurring Charge Completeness / Interconnection (F.9.6.3) (March)

16 This measure tracks the ability of the ordering and billing systems to begin
17 billing a CLEC non-recurring charges for local interconnection services on the
18 next invoice after an order has "completed". A benchmark of 90% has been
19 set as the level of performance to meet. In March 2002, BellSouth's
20 performance was 89.14%. This measure was missed because of problems
21 encountered in correcting service order errors in a timely manner. In an effort
22 to prevent this problem from occurring in the future, BellSouth continues to
23 adjust its error handling procedures to recognize, prioritize, work and resolve

1 all errors in a timelier manner. The most recent changes made include the
2 implementation of changes to the error report to capture the next available bill
3 period date for each order. This change will allow BellSouth to prioritize and
4 work errors by bill period. However, since this measure is calculated one
5 month in arrears, the revised error report is effective and utilized with errors
6 generated in April 2002.

7

8 It is important to point out that the results for this measure are calculated
9 using dollar amounts associated with completed service orders and not by
10 using the actual number of orders. This measure was missed in March as a
11 result of a large amount of money billed late on a relatively small number of
12 orders. BellSouth is currently in the process of developing a way to
13 associate dollar amounts to orders in error before billing has occurred for the
14 orders. BellSouth met the benchmark for this sub-metric in February and
15 April 2002

16

17 **General - Change Management**

18

19 **% Change Management Documentation Sent On Time (F.10.3) (February)**

20 **Average Documentation Release Delay Days (F.10.5) (February)**

21 There were two Change Management Documentation notices issued in
22 February 2002. Both of the notices for February missed the standard notice

1 interval. The February notices were only one day short of meeting the 25
2 days prior to release benchmark. BellSouth met the benchmark for these
3 sub-metrics in March 2002. There were no releases for this sub-metric in
4 April 2002.

5
6 **General – Ordering**

7
8 **% Acknowledgement Message Completeness / TAG (F.12.2.2)**

9 **(February/March/April)**

10 BellSouth failed to deliver 2 (0.0006%) of the 341,453 messages in February
11 for this sub-metric, 6 (0.0018%) of the 334,739 messages for this sub-metric
12 in March and 11 (0.0030%) of the 366,061 messages in April 2002. Analysis
13 continues to identify any issues in this process. However, such a small
14 number of failed records have not revealed any systemic process problems.

15
16 **D. CHECKLIST ITEM 4 – UNBUNDLED LOCAL LOOPS**

17 As discussed in Checklist Item 2, Sections B.2 and B.3 of Attachment 1K
18 provide data for provisioning and maintenance & repair measures for
19 unbundled local loops.

20
21 For purposes of discussion in this checklist item, the local loop sub-metrics
22 have been separated into two mode-of-entry groups, xDSL and

1 SL1/SL2/Digital. The xDSL group includes xDSL (ADSL, HDSL, UCL), ISDN
2 and Line Sharing sub-metrics. The SL1/SL2/Digital group includes the design
3 and non-design 2-wire analog loops, as well as the 2-wire and 4-wire digital
4 loop sub-metrics.

5
6 **xDSL Group**

7 **1. Provisioning Measures**

8 The xDSL group sub-metrics that did not meet the fixed critical value
9 comparison requirements for February, March and/or April 2002 are as
10 follows:

11
12 **Order Completion Interval / Line Sharing / < 6 Circuits / Dispatch (B.2.1.7.3.1)**
13 **(March)**

14 There were only six orders for this sub-metric in March 2002. The small
15 universe of orders for the month does not provide a statistically conclusive
16 comparison to the retail analogue. BellSouth met the retail analogue
17 comparison for this sub-metric in February and April 2002.

18
19 **Order Completion Interval / Line Sharing / < 6 Circuits / Non-Dispatch**
20 **(B.2.1.7.3.2) (April)**

21 There were 180 CLEC orders completed for this sub-metric in April 2002.
22 The average completion interval for the CLEC orders was 3.96 days

1 compared to 3.59 days for the BellSouth retail analogue, a difference of less
2 than 0.4 days. The primary cause of the miss for this sub-metric is that the
3 standard interval for the orders in this sub-metric is four days as compared to
4 the “available in three days” requirement for the retail analogue orders.

5 BellSouth met the retail analogue comparison for this sub-metric in February
6 and March 2002.

7
8 Held Orders / UNE ISDN / < 10 Circuits / Facility (B.2.3.6.1.1) (February)

9 There were only two orders for this sub-metric in February 2002. The small
10 universe of orders for this sub-metric does not provide a statistically
11 conclusive comparison to the retail analogue. BellSouth met the retail
12 analogue comparison for this sub-metric in March and April 2002.

13
14 Held Orders / Line Sharing / < 10 Circuits / Other (B.2.3.7.1.3) (April)

15 There was only one order for this sub-metric in April 2002. The small
16 universe of orders for this sub-metric does not provide a statistically
17 conclusive comparison to the retail analogue. BellSouth met the retail
18 analogue comparison for this sub-metric in February and March 2002.

19
20 % Jeopardies / UNE ISDN (B.2.5.6) (February/March/April)

21 There were 15 orders placed in jeopardy for facilities reasons for orders in
22 this sub-metric in February, 43 orders put in jeopardy for March and 58

1 jeopardy orders in April 2002. All of the February jeopardies, 39 of the 43
2 March jeopardies and 47 of the April jeopardies were resolved prior to the due
3 dates and the orders completed on time. All 4 jeopardies not resolved by the
4 due dates in March and 7 of the 11 jeopardies not resolved by the due dates
5 in April were held due to customer reasons.

6
7 % Jeopardy Notice >= 48 Hours / xDSL / Electronic (B.2.10.5)

8 (February/March)

9 There were only five jeopardy notices issued for this sub-metric in February
10 and ten notices issued in March 2002. The small universe of orders for this
11 sub-metric does not provide a conclusive benchmark comparison. There
12 were no xDSL orders placed in jeopardy status in April 2002.

13
14 % Provisioning Troubles within 30 Days / xDSL / < 10 Circuits / Dispatch

15 (B.2.19.5.1.1) (April)

16 There were 22 troubles reported for orders that completed for this sub-metric
17 in the prior 30 days for March 2002. Four of the troubles (18%) were closed
18 as "no trouble found." No patterns or systemic installation issues were
19 identified for the remainder of the troubles. BellSouth met the retail analogue
20 comparison for this sub-metric in February and March 2002.

21

1 % Provisioning Troubles within 30 Days / UNE ISDN / < 10 Circuits / Dispatch

2 (B.2.19.6.1.1) (March/April)

3 There were 15 troubles reported for orders that completed for this sub-metric
4 in the prior 30 days for March and 24 troubles reported for the 253 orders
5 completed in the 30 days prior to April 2002. BellSouth has implemented an
6 improved procedure to document circuit test results in the order closeout
7 narratives. This initiative, along with added emphasis on cooperative testing
8 procedures, should improve the results for this sub-metric. No patterns or
9 systemic installation issues were identified for the trouble reports for this sub-
10 metric. BellSouth met the retail analogue for this sub-metric in February
11 2002.

12
13 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits /

14 Dispatch (B.2.19.7.1.1) (February/April)

15 There were only seven orders for this sub-metric in February 2002. The small
16 universe of orders for the month does not provide a statistically conclusive
17 comparison to the retail analogue. There were 15 troubles reported for orders
18 completed for this sub-metric in the 30 days prior to April 2002. Of the 15
19 April troubles, 4 (27%) were closed to "no trouble found." No patterns or
20 systemic installation issues were identified for the trouble reports for this sub-
21 metric. BellSouth met the retail analogue comparison for this sub-metric in
22 March 2002.

1

2 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits / Non-
3 Dispatch (B.2.19.7.1.2) (February/April)

4 There were only thirteen orders completed for this sub-metric in February
5 2002. This small universe of orders for the month does not provide a
6 statistically conclusive comparison to the retail analogue. There were 23
7 troubles reported for orders completed for this sub-metric in the 30 days prior
8 to April 2002. Of the 23 total trouble reports for April, 15 (65%) were closed
9 as "no trouble found." BellSouth met the retail analogue comparison for this
10 sub-metric in March 2002.

11

12 Average Completion Notice Interval / xDSL / < 10 Circuits / Dispatch
13 (B.2.21.5.1.1) (March)

14 The root cause analysis of this measure indicated that the only differences
15 between the performance between BellSouth retail and CLECs are the
16 mismatches found when the orders are compared with the original LSRs.
17 The start of the completion interval is the point at which the technician
18 completes the order, and the interval ends when the completion notice is
19 sent. Any change to a name, number of items, etc., occurring during the
20 provisioning process will generate inconsistencies with the original LSRs that
21 must be resolved before a final completion notice can be sent. Any time to
22 resolve these inconsistencies with the original LSRs is included in the

1 average. Because of numerous CLEC changes and order updates,
2 mismatches on CLECs orders exceed those for BellSouth retail orders.
3 Combining this with the smaller base for the CLECs' measurement raises the
4 average, which results in a miss. Specific Service Representatives within the
5 Work Management Centers have been assigned to resolve any completion
6 issues that are required. Providing specific training and dedicating personnel
7 to this task should reduce the difference between the CLEC and retail
8 analogue results. There was no CLEC activity for this sub-metric in either
9 February or April 2002.

10
11 **2. Maintenance & Repair Measures**

12 The xDSL group sub-metrics that did not meet the fixed critical value
13 comparison requirements for February, March and/or April 2002 are as
14 follows:

15
16 **% Missed Repair Appointments / UNE ISDN / Non-Dispatch (B.3.1.6.2)**

17 **(February)**

18 BellSouth completed 40 of the 41 repair appointments as scheduled for this
19 sub-metric in February 2002. There were no systemic maintenance issues
20 revealed for the missed appointment in February. BellSouth met the retail
21 analogue comparison for this sub-metric in March and April 2002.

22

1 Missed Repair Appointments / Line Sharing / Non-Dispatch (B.3.1.7.2)

2 (February/March/April)

3 BellSouth completed 28 of the 34 repair appointments as scheduled for this
4 sub-metric in February, 27 of the 37 appointments scheduled for March and
5 31 of the 37 repair appointments as scheduled for April 2002. There were no
6 patterns or systemic maintenance issues revealed for the 6 missed
7 appointments in February. In March, all ten of the trouble reports associated
8 with these missed due dates were closed as "no trouble found," but the
9 appointment dates were missed due to improper order closeout procedures.
10 Of the 6 total trouble reports for this sub-metric in April 2002, 4 (67%) were
11 closed to "no trouble found." The following of proper Line Sharing methods
12 and procedures is being emphasized to all Central Office technicians.

13
14 Customer Trouble Report Rate / UNE ISDN / Dispatch (B.3.2.6.1)

15 (February/March/April)

16 Both the CLECs and BellSouth retail had 97% to 98% trouble free service for
17 all in service lines in this sub-metric in February, March and April 2002. Even
18 though the measurement indicated that BellSouth did not meet the retail
19 analogue, both BellSouth and the CLECs were being provided a high level of
20 service for this sub-metric. BellSouth is developing an action plan to improve
21 circuit testing and turn-up documentation. ISDN test jacks have been

1 installed in each central office to facilitate improved testing and turn-up control
2 procedures.

3

4 Customer Trouble Report Rate / Line Sharing / Non-Dispatch (B.3.2.7.2)

5 (February)

6 There were a total of 34 troubles for the 1,565 in service lines for this sub-
7 metric in February 2002. In February 2002, 29 of the 34 troubles (85%) were
8 closed as "no trouble found," indicating minimal impact on the customer.
9 Even though the measurement indicated that BellSouth did not meet the retail
10 analogue, both BellSouth and the CLECs were being provided a high level of
11 service for this sub-metric. BellSouth met the retail analogue comparison for
12 this sub-metric in March and April 2002.

13

14 Maintenance Average Duration / UNE ISDN / Non-Dispatch (B.3.3.6.2)

15 (February/March)

16 In February 2002, the average maintenance duration for CLEC orders was
17 5.67 days compared to 2.45 days for the retail analogue. In March the
18 average duration for CLEC orders was reduced to 3.88 days compared to
19 2.60 days for the retail analogue. The average maintenance interval for
20 CLEC orders has been reduced by 48% from February to April. BellSouth
21 met the retail analogue comparison for this sub-metric in April 2002.

22

1 Maintenance Average Duration / Line Sharing / Non-Dispatch (B.3.3.7.2)

2 (March)

3 The average maintenance interval for CLEC orders in this sub-metric was
4 17.86 hours in March compared to 4.28 hours for the retail analogue. Of the
5 37 total trouble reports for the orders associated with this sub-metric, 28
6 (76%) were closed as “no trouble found.” Ten of the trouble reports that were
7 closed as “no trouble found,” had abnormally long completion intervals due to
8 improper order closeout procedures. The following of proper Line Sharing
9 methods and procedures is being emphasized to all Central Office
10 technicians. BellSouth met the retail analogue comparison for this sub-
11 metric in February and April 2002.

12
13 % Repeat Troubles within 30 Days / Line Sharing / Non-Dispatch (B.3.4.7.2)

14 (February/March)

15 There were 11 repeat reports for February 2002 of the 34 total troubles
16 reported. All 11 of the repeat reports were closed as “no trouble found.” Of
17 the 37 total trouble reports for March, 12 were repeat reports. Nine of these
18 twelve repeat reports were closed as “no trouble found.” BellSouth met the
19 retail analogue for this sub-metric in April 2002.

20
21 Out of Service > 24 Hours / UNE ISDN / Non-dispatch (B.3.5.6.2) (February)

1 Only 1 of the 41 repair orders in February was out of service longer than 24
2 hours. No systemic maintenance issues were identified for the missed order.
3 BellSouth met the retail analogue comparison for this sub-metric in March and
4 April 2002.

5
6 **SL1/SL2/Digital Loop Group**

7 **1. Provisioning Measures**

8 The SL1/SL2/Digital Loop group sub-metrics that did not meet the fixed
9 critical value comparison requirements for February, March and/or April 2002
10 are as follows:

11
12 **Order Completion Interval (OCI)**

13 OCI is adversely affected by LSRs for which CLECs request intervals beyond
14 the offered interval. When a CLEC requests an interval beyond the available
15 interval offered by BellSouth, an "L" code should be entered on the Service
16 Order generated by BellSouth. Such "L" coded orders are excluded from the
17 OCI metrics.

18
19 **Order Completion Interval / 2w Analog Loop Design / < 10 Circuits / Dispatch**
20 **(B.2.1.8.1.1) (February/March/April)**

21 There were a total of 365 orders completed for this sub-metric in February,
22 298 orders completed in March and 159 orders completed in April 2002. The

1 primary factor for the misses in this sub-metric is that the standard installation
2 interval for this product is 4 business days. Even though the committed dates
3 to the customer are generally being met, the intervals for orders in this sub-
4 metric are longer than for the retail analogue product. BellSouth continues to
5 work to lower the interval for this sub-metric to meet the "3 calendar day"
6 interval ordered for the POTS type retail analogue services in Florida.

7
8 Order Completion Interval / 2w Analog Loop Non-Design / < 10 Circuits /

9 Dispatch (B.2.1.9.1.1) (February/March)

10 The February and March 2002 misses were caused in large part due to the 4-
11 day standard interval for orders in this sub-metric as compared to the 3-day
12 interval required for the retail analogue. BellSouth continues to work to lower
13 the interval for this sub-metric to meet the "3 calendar day" interval ordered
14 for the POTS type retail analogue services in Florida. BellSouth met the retail
15 analogue comparison for this sub-metric in April 2002.

16
17 Order Completion Interval / 2w Analog Loop Non-Design / < 10 Circuits /

18 Dispatch In (B.2.1.9.1.4) (February/March/April)

19 There were only five orders for this sub-metric in February and fifteen orders
20 in March 2002. The small universe of orders for these months does not
21 provide a statistically conclusive comparison to the retail analogue. There
22 were 36 CLEC orders completed for this sub-metric in April 2002. The

1 average completion interval for these orders was 3.81 days compared to 1.74
2 days for the BellSouth retail analogue. The primary cause for the miss for this
3 sub-metric is that the standard interval for the orders in this sub-metric is four
4 days as compared to the "available in three days" requirement for the retail
5 analogue orders.

6

7 Order Completion Interval / 2w Analog Loop w/LNP Design / < 10 Circuits /
8 Dispatch (B.2.1.12.1.1) (February/March/April)

9 There were a total of 172 orders that completed for this sub-metric in
10 February, 125 orders that completed in March and 156 orders that completed
11 in April 2002. A detailed analysis indicated a significant number of orders
12 with customer requested extended intervals were not "L coded" and should
13 have been excluded from the measurement. BellSouth continues to work to
14 lower the interval for this sub-metric to meet the "3 day" interval ordered for
15 the POTS type retail analogue services in Florida. The current standard
16 interval for orders in this sub-metric is four business days as compared to the
17 three-calendar day interval for the retail analogue.

18

19 Order Completion Interval / 2w Analog Loop w/LNP Non-Design / < 10
20 Circuits / Dispatch (B.2.1.13.1.1) (February/March/April)

21 There were a total of 270 orders that completed for this sub-metric in
22 February, 566 orders that completed in March and 477 orders that completed

1 in April 2002. BellSouth continues to work to lower the interval for this sub-
2 metric to meet the "3 calendar day" interval ordered for the POTS type retail
3 analogue services in Florida. The current standard interval for this sub-metric
4 is four business days as compared to the three-day interval for the retail
5 analogue.

6
7 Order Completion Interval / 2w Analog Loop w/LNP Non-Design / < 10
8 Circuits / Dispatch In (B.2.1.13.1.4) (February/March/April)

9 There were a total of 360 orders completed for this sub-metric in February,
10 491 orders that completed in March and 213 orders that completed in April
11 2002. BellSouth continues to work to lower the interval for this sub-metric to
12 meet the "3 calendar day" interval ordered for the POTS type retail analogue
13 services in Florida. The current standard interval for this sub-metric is four
14 business days as compared to the three-day interval for the retail analogue.

15
16 Order Completion Interval / Digital Loop < DS1 / < 10 Circuits / Dispatch
17 (B.2.1.18.1.1) (February/March/April)

18 There were a total of 366 orders that completed for this sub-metric in
19 February, 391 orders that completed in March and 377 orders that completed
20 in April 2002. BellSouth continues to work to lower the interval for this sub-
21 metric. Only 14 of the February orders, 13 of the March orders and 14 of the
22 April orders missed the committed installation interval due to company

1 reasons. BellSouth is currently investigating the makeup of the retail
2 analogue for this sub-metric.

3
4 The remainder of the provisioning measures that did not meet the retail
5 analogue for provisioning is as follows:

6
7 Held Orders / 2w Analog Loop w/LNP Non-Design / >= 10 Circuits / Facility
8 (B.2.3.13.2.1) (February)

9 There was only one order for this sub-metric in February 2001. The small
10 universe size for this sub-metric does not provide a statistically conclusive
11 comparison to the retail analogue. BellSouth met the retail analogue
12 comparison for this sub-metric in March and April 2002.

13
14 % Jeopardies / 2w Analog Loop Design (B.2.5.8) (February/March/April)

15 In February 2002, there were a total of 67 jeopardies issued for the 486
16 orders that were scheduled for this sub-metric. Of the 67 February
17 jeopardies, 42 were resolved prior to the due dates and the orders completed
18 on time, and the remaining 15 jeopardy orders were held for customer
19 reasons. In March 2002, there were a total of 61 jeopardies issued for the
20 405 orders that were scheduled for this sub-metric. All but 8 of the jeopardies
21 were resolved prior to the due date and the orders worked as scheduled. Of
22 the 8 unresolved jeopardies, all 8 orders were held due to customer reasons.

1 In April 2002, there were a total of 34 jeopardies issued for the 217 orders
2 that were scheduled for this sub-metric. All but 5 of the jeopardies were
3 resolved prior to the due date and the orders worked as scheduled. Of the 34
4 total April jeopardies, only 2 caused missed appointments due to company
5 reasons.

6
7 % Jeopardies / 2w Analog Loop Non-Design (B.2.5.9) (February/March/April)

8 In February 2002, there were a total of 61 jeopardies issued for the 745
9 orders scheduled. All but 6 of the February jeopardies were resolved prior to
10 the due date and the orders were completed as scheduled. Four of the six
11 missed February appointments were due to customer reasons, and only two
12 were due to company reasons. In March 2002, there were a total of 103
13 jeopardies issued for the 912 orders that were scheduled for this sub-metric.
14 Of the 103 total March jeopardies, 90 were resolved prior to the due dates
15 and the orders completed on time. All 13 of the orders with missed due dates
16 were held due to customer reasons. In April 2002, there were a total of 90
17 jeopardies issued for the 1,235 orders that were scheduled for this sub-
18 metric. Of the 90 April jeopardies, only 8 resulted in a missed installation
19 appointments due to BellSouth reasons.

20
21 % Jeopardies / 2w Analog Loop w/LNP Design (B.2.5.12)

22 (February/March/April)

1 In February 2002, there were a total of 42 jeopardies issued for the 379
2 orders that were scheduled for this sub-metric. All but 6 of the February
3 jeopardies were resolved prior to the due dates, and the orders were
4 completed on time. All six of the jeopardies causing missed appointments in
5 February were due to customer reasons. In March 2002, there were a total of
6 21 jeopardies issued for the 273 orders that were scheduled for this sub-
7 metric. Of the 21 total March jeopardies, 18 were resolved prior to the due
8 dates and the orders completed on time. All 3 of the orders with missed due
9 dates were held due to customer reasons. In April 2002, there were a total of
10 32 jeopardies issued for the 425 orders that were scheduled for this sub-
11 metric. Of the 32 April jeopardies, 29 were resolved prior to the scheduled
12 due date and the orders completed as scheduled. All three of the unresolved
13 jeopardy orders were missed due to customer reasons.

14

15 % Jeopardies / 2w Analog Loop w/LNP Non-Design (B.2.5.13)

16 (February/March/April)

17 In February 2002, there were a total of 69 jeopardies issued for the 1,036
18 scheduled orders. Only 4 of the 69 February jeopardies resulted in missed
19 installation appointments, all of which were missed due to customer reasons.
20 In March 2002, there were a total of 87 jeopardies issued for the 1,694 orders
21 that were scheduled for this sub-metric. Of the 87 total March jeopardies, 78
22 were resolved prior to the due dates and the orders completed on time. All of

1 the orders with missed due dates were held due to customer reasons. In
2 April 2002, there were a total of 69 jeopardies issued for the 1,121 orders that
3 were scheduled for this sub-metric. Of the 69 April jeopardies for this sub-
4 metric, 60 were resolved prior to the due dates and the orders completed on
5 time. Only 1 of the jeopardy orders was held for company reasons.

6
7 % Jeopardies / Digital Loop < DS1 (B.2.5.18) (April)

8 There were a total of 57 jeopardies issued for the 128 installation
9 appointments that were scheduled for this sub-metric in April 2002. While the
10 data indicates that BellSouth placed a higher percentage of CLEC orders in
11 jeopardy status, all but 11 of the April jeopardies were resolved prior to the
12 due dates, and the orders were worked on time. Of the 11 April jeopardies
13 causing missed appointments, only four were missed due to company
14 reasons. BellSouth met the retail analogue comparison for this sub-metric in
15 February and March 2002.

16
17 % Jeopardies / Digital Loop >= DS1 (B.2.5.19) (February/March/April)

18 There were a total of 91 jeopardies issued for the 177 installation
19 appointments that were scheduled for this sub-metric in February, 69
20 jeopardies for the 139 appointments scheduled for March and 123 jeopardies
21 issued for the 181 orders scheduled for April 2002. All 14 of the February

1 jeopardies, all 9 of the March jeopardies and 17 of the 21 April jeopardies
2 causing missed appointments were missed due to customer reasons.

3
4 % Jeopardy Notice >= 48 Hours / 2w Analog Loop Non-Design / Electronic
5 (B.2.10.9) (February/April)

6 BellSouth met the 48-hour benchmark for 47 of the 50 (94.00%) jeopardy
7 notices for this sub-metric in February and for 72 of the 74 (94.74%) 2002.
8 The 95% benchmark required that 48 of the 50 notices meet the 48-hour
9 interval. Normal rounding convention indicates that there is no significant
10 difference between the April CLEC result and the benchmark. BellSouth met
11 the benchmark for this sub-metric in March 2002.

12
13 % Jeopardy Notice >= 48 Hours / Digital Loop < DS1 / Electronic (B.2.10.18)
14 (March)

15 BellSouth met the 48-hour benchmark for 48 of the 52 jeopardy notices for
16 this sub-metric in March 2002. The 95% benchmark required that 50 of the
17 52 notices meet the 48-hour interval. BellSouth met the benchmark for this
18 sub-metric in February and April 2002.

19
20 % Missed Installation Appointments / 2w Analog Loop Non-Design / >= 10
21 Circuits / Dispatch (B.2.18.9.2.1) (February)

1 BellSouth completed 13 of the 16 installation orders as scheduled for this
2 sub-metric in February 2002. There were no patterns or systemic installation
3 issues identified for the 3 missed orders. BellSouth met the retail analogue
4 comparison for this sub-metric in March and April 2002.

5
6 % Missed Installation Appointments / 2w Analog Loop w/LNP Non-Design / <
7 10 Circuits / Dispatch In (B.2.18.13.1.4) (February/March)

8 BellSouth completed 584 of the 587 (99.5%) installation orders as scheduled
9 for this sub-metric in February and completed 814 of the 819 (99.4%)
10 appointments as scheduled in March 2002. There were no patterns or
11 systemic installation issues identified for any of the missed orders. BellSouth
12 met the retail analogue comparison for this sub-metric in April 2002.

13
14 % Missed Installation Appointments / Digital Loop >= DS1 / < 10 Circuits /
15 Dispatch (B.2.18.19.1.1) (February/April)

16 BellSouth completed 348 of the 363 installation appointments as scheduled
17 for this sub-metric in February and 373 of the 385 appointments as scheduled
18 for April 2002. The majority of the February and April missed appointments
19 were due to lack of available company facilities. The remainder of the missed
20 appointments was due to various scheduling and prioritization problems.
21 BellSouth is refocusing its efforts on this area to improve its performance on

1 these orders. BellSouth met the retail analogue comparison for this sub-
2 metric in March 2002.

3
4 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Design / < 10 Circuits
5 / Dispatch (B.2.19.8.1.1) (February/March)

6 There were 38 troubles reported for this sub-metric in February for the 364
7 orders completed in the prior 30 days and 46 troubles reported in March 2002
8 for the 459 orders completed in the prior 30 days. The majority of the
9 troubles were due to defective cable facilities and serving wire. Of the 38
10 troubles reported for February and 46 reports for March, 24% and 26%,
11 respectively, were closed as "no trouble found." Of the 38 total reports for
12 February and 46 trouble reports for March, 84% and 93%, respectively, were
13 reported by the same CLEC. BellSouth has begun a trial with that CLEC to
14 improve the provisioning process on conversion orders. An analysis of the
15 remainder of the troubles revealed no specific patterns or trends. BellSouth
16 met the retail analogue comparison for this sub-metric in April 2002.

17
18 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Non-Design / < 10
19 Circuits / Dispatch (B.2.19.9.1.1) (February/March)

20 There were a total of 57 troubles reported for this sub-metric for the 759
21 orders that completed in the 30 days prior to February and 59 troubles
22 reported for the 762 orders completed in the 30 days prior to March 2002.

1 Most of the reported troubles for this sub-metric were due to defective cable
2 facilities. Of the 57 total reports for February and 59 total reports for March,
3 49% and 53%, respectively, were reported by the same CLEC. BellSouth has
4 begun a trial with that CLEC to improve the provisioning process on
5 conversion orders. BellSouth met the retail analogue comparison for this sub-
6 metric in April 2002.

7
8 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Non-Design / < 10
9 Circuits / Dispatch In (B.2.19.9.1.4) (March)

10 There were only six orders for this sub-metric in March 2002. The small
11 universe of orders for the month does not provide a statistically conclusive
12 comparison to the retail analogue. BellSouth met the retail analogue
13 comparison for this sub-metric in February and April 2002.

14
15 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Non-Design / >= 10
16 Circuits / Dispatch (B.2.19.9.2.1) (March)

17 There were only four troubles reported for the CLEC aggregate for this sub-
18 metric in March 2002. This small universe does not provide a statistically
19 conclusive comparison to the retail analogue. BellSouth met the retail
20 analogue comparison for this sub-metric in February and April 2002.

21

1 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Non-Design / >= 10
2 Circuits / Dispatch In (B.2.19.9.2.4) (April)

3 There were only three troubles reported for the CLEC aggregate for this sub-
4 metric in April 2002. This small universe does not provide a statistically
5 conclusive comparison to the retail analogue. There was no CLEC activity for
6 this sub-metric in either February or March 2002.

7
8 % Provisioning Troubles w/i 30 Days / 2w Analog Loop w/LNP Design / < 10
9 Circuits / Dispatch (B.2.19.12.1.1) (February/March)

10 There were a total of 31 troubles reported for this sub-metric for the 363
11 orders that completed in the 30 days prior to February and 31 troubles
12 reported for the 386 orders completed in the 30 days prior to March 2002. Of
13 the 31 February trouble reports, 5 (16%) were closed as "no trouble found."
14 Of the 31 March trouble reports, 13 (42%) were closed as "no trouble found."
15 The remainder of the troubles were generally due to facility and equipment
16 wiring problems. BellSouth met the retail analogue comparison for this sub-
17 metric in April 2002.

18
19 % Provisioning Troubles w/i 30 Days / 2w Analog Loop w/LNP Non-Design /
20 >= 10 Circuits / Dispatch (B.2.19.13.2.1) (February/March)

21 There were a total of 9 troubles reported for this sub-metric for the 45 orders
22 that completed in the 30 days prior to February and 4 troubles reported for the

1 26 orders that completed in the 30 days prior to March 2002. No trends or
2 systemic installation issues were identified for the troubles reported for this
3 sub-metric. BellSouth met the retail analogue comparison for this sub-metric
4 in April 2002.

5
6 % Provisioning Troubles w/i 30 Days / 2w Analog Loop w/LNP Non-Design /
7 >= 10 Circuits / Dispatch In (B.2.19.13.2.4) (February/March/April)

8 There were a total of 3 troubles reported for this sub-metric for the 28 orders
9 that completed in the 30 days prior to February, 1 trouble reported for the 15
10 orders that completed in the 30 days prior to March and 2 troubles reported
11 for the 26 orders that completed in the 30 days prior to April 2002. No trends
12 or systemic installation issues were identified for the small number of troubles
13 reported for this sub-metric.

14
15 % Provisioning Troubles w/i 30 Days / Digital Loops < DS1 / < 10 Circuits /
16 Dispatch (B.2.19.18.1.1) (April)

17 There were a total of 42 troubles reported for this sub-metric for the 510
18 orders that completed in the 30 days prior to April 2002. In April, 14% of the
19 trouble reports in this sub-metric were closed as "no trouble found" indicating
20 minimal impact on the end user. The majority of the troubles found for April
21 were due to defective plant facilities. BellSouth met the retail analogue
22 comparison for this sub-metric in February and March 2002.

1

2 % Provisioning Troubles w/i 30 Days / Digital Loops >= DS1 / < 10 Circuits /
3 Dispatch (B.2.19.19.1.1) (February/March/April)

4 There were a total of 18 troubles reported for this sub-metric for the 273
5 orders that completed in the 30 days prior to February, 19 troubles reported
6 for the 363 orders that completed in the 30 days prior to March and 46
7 troubles reported for the 373 orders that completed in the 30 days prior to
8 April 2002. In February, March and April 2002, 5%, 32% and 50%,
9 respectively, of the trouble reports in this sub-metric were closed as “no
10 trouble found” indicating minimal impact on the end user. BellSouth is
11 currently investigating the caused for the misses in this sub-metric.

12

13 Average Completion Notice Interval / 2w Analog Loop Design / < 10 Circuits /
14 Dispatch (B.2.21.8.1.1) (February/March/April)

15 Average Completion Notice Interval / 2w Analog Loop w/LNP Design / < 10
16 Circuits / Dispatch (B.2.21.12.1.1) (February/March/April)

17 Average Completion Notice Interval / Digital Loop < DS1 / < 10 Circuits /
18 Dispatch (B.2.21.18.1.1) (March)

19 The root cause analysis of these measures indicated that the only differences
20 between the performance between BellSouth retail and CLECs are the
21 mismatches found when the orders are compared with the original LSRs.
22 The start of the completion interval is the point at which the technician

1 completes the order, and the interval ends when the completion notice is
2 sent. Any change to a name, number of items, etc., occurring during the
3 provisioning process will generate inconsistencies with the original LSRs that
4 must be resolved before a final completion notice can be sent. Any time to
5 resolve these inconsistencies with the original LSRs is included in the
6 average. Because of numerous CLEC changes and order updates,
7 mismatches on CLECs orders exceed those for BellSouth retail orders.
8 Combining this with the smaller base for the CLECs' measurement raises the
9 average, which results in a miss. Specific Service Representatives within the
10 Work Management Centers have been assigned to resolve any completion
11 issues that are required. Providing specific training and dedicating personnel
12 to this task should reduce the difference between the CLEC and retail
13 analogue results.

14

15 **2. Maintenance & Repair Measures**

16 The SL1/SL2/Digital Loop group sub-metrics that did not meet the fixed
17 critical value comparison requirements for February, March and/or April 2002
18 are as follows:

19

20 % Missed Repair Appointments / 2W Analog Loop Non-Design / Non-

21 Dispatch (B.3.1.9.2) (February/March/April)

1 BellSouth completed 61 of the 63 repair appointments for this sub-metric as
2 scheduled in February, 50 of the 55 appointments scheduled for March and
3 71 of the 75 repair appointments as scheduled for April 2002. Both of the
4 orders shown missed for February were vendor meet requests and should
5 have been excluded from this measure. All 5 of the missed dates in March
6 were due to one C.O. equipment failure and affected one customer. Repair
7 Service Attendants are being re-covered on proper order closeout
8 procedures. There were only 4 missed repair appointments for this sub-
9 metric in April. All 4 missed appointments were the result of a single digital
10 carrier equipment failure. There were no distinct patterns or systemic
11 maintenance problems identified for any of the remainder of the missed
12 appointments in these three months.

13

14 Customer Trouble Report Rate / 2w Analog Loop Non-Design / Dispatch
15 (B.3.2.9.1) (April)

16 There were 998 troubles reported for the 39456 lines in service for this sub-
17 metric in April 2002. Both CLECs and BellSouth's retail customers received
18 trouble free service on more than 97% of lines in service for the month for this
19 sub-metric. Even though the measurement indicated that BellSouth did not
20 meet the retail analogue, both BellSouth and the CLECs were being provided
21 a high level of service for this sub-metric. BellSouth met the retail analogue
22 comparison for this sub-metric in February and March 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

Maintenance Average Duration / 2w Analog Loop Non-Design / Non-Dispatch

(B.3.3.9.2) (April)

There were 75 CLEC repair orders completed for this sub-metric in April 2002. The average repair interval for CLEC orders was 7.93 hours as compared to 5.01 hours for the BellSouth retail analogue. Even though BellSouth missed the retail analogue comparison for this sub-metric in April, only 3 of the 75 repair orders resulted in missed appointments. BellSouth met the retail analogue comparison for this sub-metric in February and March 2002.

Out of Service > 24 Hours / 2W Analog Loop Non-Design / Dispatch

(B.3.5.9.1) (February/April)

Of the 36 and 34 total “service affecting” trouble reports for this sub-metric in February and April 2002, respectively, 9 and 8, respectively, were out of service longer than 24 hours. No patterns or systemic maintenance issues were identified for any of these reports. BellSouth met the retail analogue comparison for this sub-metric in March 2002.

Out of Service > 24 Hours / 2W Analog Loop Non-Design / Non-Dispatch

(B.3.5.9.2) (March)

1 There were only 4 “out of service” trouble reports for this sub-metric in March
2 2002. The small universe of orders for this sub-metric does not provide a
3 statistically conclusive comparison to the retail analogue. BellSouth met the
4 retail analogue comparison for this sub-metric in February and April 2002.

5
6 **E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT**

7
8 The Provisioning and Maintenance & Repair sub-metrics that did not meet the
9 retail analogue in February, March and/or April 2002 associated with
10 Checklist Item 5 are as follows:

11
12 **Order Completion Interval / Local Interoffice Transport / < 10 Circuits /**
13 **Dispatch (B.2.1.2.1.1) (February/March)**

14 In February 2002, there were 21 orders for this sub-metric with an average
15 completion interval of 21 days. There were 29 orders for this sub-metric in
16 March 2002, with an average completion interval of 20 days. In February, 19
17 of the 21 orders, and 25 of the 29 orders for March 2002, completed within
18 the standard order interval or met the due date requested by the customer, if
19 later than the standard interval due date. Of the 21 orders for February 2002,
20 11 had extended due date intervals at the customer request, but were not
21 given an “L” code. These orders should have been excluded from the
22 measurement for February. Proper coding of these orders would have

1 produced an average CLEC OCI for this sub-metric of 14.45 days, which is
2 below the average OCI for the retail analogue for the month.

3
4 Missed Repair Appointments / Local Interoffice Transport / Dispatch

5 (B.3.1.2.1) (March)

6 There was only one order for this sub-metric in March 2002. The small
7 universe of orders for the month does not provide a statistically conclusive
8 comparison to the retail analogue. BellSouth met the retail analogue
9 comparison for this sub-metric in February and April 2002.

10
11 Maintenance Average Duration / Local Interoffice Transport / Dispatch

12 (B.3.3.2.1) (March)

13 There was only one order for this sub-metric in March 2002. The small
14 universe of orders for the month does not provide a statistically conclusive
15 comparison to the retail analogue. BellSouth met the retail analogue
16 comparison for this sub-metric in February and April 2002.

17
18 Out of Service > 24 Hours / Local Interoffice Transport / Dispatch (B.3.5.2.1)

19 (March)

20 There was only one order for this sub-metric in March 2002. The small
21 universe of orders for the month does not provide a statistically conclusive

1 comparison to the retail analogue. BellSouth met the retail analogue
2 comparison for this sub-metric in February and April 2002.

3
4 **F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING**

5
6 The data in these measures indicate that BellSouth met the
7 benchmark/analogue requirements for all measurements in Checklist Item 6
8 for February, March and April 2002 for which there was CLEC activity.

9
10 **G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES**

11 **H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR**
12 **SERVICES**

13
14 As indicated in Attachment 1K, Sections F.6, F.7 and F.8, BellSouth met the
15 benchmark/analogue requirements of Checklist Items 7a and 7b in February,
16 March and April 2002. Even though BellSouth tracks and reports these
17 measures, the processes used in providing these services are designed to
18 provide parity for all users.

19
20 **I. CHECKLIST ITEM 10 – ACCESS TO DATABASES AND ASSOCIATED**
21 **SIGNALING**

1 BellSouth met the required benchmarks for all four of the four sub-metrics
2 associated with this checklist item in February and April 2002 and met three
3 of the four sub-metrics in March 2002. See items F.13.1.1 through F.13.3 in
4 Attachment 1K for further details. The sub-metric that did not meet the
5 benchmark for March 2002 was as follows:

6

7 % NXXs / LRNs Loaded by LERG Effective Date / Region (F.13.3) (March)

8 BellSouth met the effective date for loading 29 of the 30 NXXs implemented
9 during March 2002. This is regional measure. BellSouth met the LERG
10 effective dates for all NXXs loaded for Florida operations in March 2002.
11 BellSouth met the benchmark for this sub-metric in February and April 2002.

12

13 **J. CHECKLIST ITEM 11 – NUMBER PORTABILITY**

14

15 All the measurements in this Checklist Item were met or exceeded for
16 February, March and/or April 2002 except for the following:

17

18 % Missed Installation Appointments / LNP (Standalone) / < 10 Circuits / Non-
19 Dispatch (B.2.18.17.1.2) (February/March)

20 BellSouth missed only 9 of the 3,475 appointments scheduled for this sub-
21 metric in February and missed only 3 of the 3,341 appointments scheduled
22 for March 2002. BellSouth met over 99.7% of the scheduled appointments for

1 both retail and the CLECs in this sub-metric for February and over 99.9% in
2 March. When BellSouth provisions high quality service coupled with very
3 large universe sizes, it can cause an apparent out of equity condition from a
4 quantitative viewpoint. In these cases, there is very little variation and the
5 universe size is so large that the Z-test becomes overly sensitive to any
6 difference. In other words, the statistical test shows that the measurement
7 does not meet the fixed critical value when compared with the retail analogue,
8 but BellSouth's actual performance for both CLECs and its own retail
9 operations is at a very high level – in this case over 99%. From a practical
10 point of view, the CLECs' ability to compete has not been hindered even
11 though the statistical results may technically show that BellSouth failed to
12 meet the benchmark/analogue.

13

14 Disconnect Timeliness / LNP / < 10 Circuits (B.2.31)

15 The Disconnect Timeliness measure is supposed to track the time it takes to
16 disconnect a number in the central office switch after the message has been
17 received from the Local Number Portability (LNP) Gateway that it is ready.
18 However, this measurement does not track the relevant time to perform this
19 function.

20

21 On a great majority of LNP orders, BellSouth creates what is referred to as a
22 "trigger" in conjunction with the order. This trigger gives the end user

1 customer the ability to make and receive calls from other customers who are
2 served by the customer's host switch at the time of the LNP activation. This
3 ability is not dependent upon BellSouth working a disconnect order in the
4 central office switch. In other words, when a trigger is involved, an end user
5 customer can receive calls from other customers served by the same host
6 switch before the disconnect order is ever worked.

7
8 As it currently exists, Performance Measure P-13 does not recognize the
9 importance of triggers and their effect on the LNP process. Rather, the
10 current measure calculates the end time of the LNP activity as the processing
11 of the actual disconnect order in the host switch, even though, from a
12 customer's perspective, this activity is totally meaningless on most LNP
13 orders. It is the activation of the LNP and the routing function accomplished
14 by the LSMS that ultimately determines whether the end user is back in full
15 service and is able to make and receive calls when a trigger is used in porting
16 a telephone number. So, while BellSouth may be missing this measure, the
17 actual impact on CLECs and their end users, for a great majority of the orders
18 is minimal, or nonexistent. The Georgia PSC is currently evaluating a change
19 in this measure that more accurately reflects the LNP process and its impacts
20 on end users.

21

1 **K. CHECKLIST ITEM 14 – RESALE**

2
3 BellSouth has met or exceeded the benchmarks/analogues for 86% of the
4 213 Resale metrics for the month of February, for 84% of the 220 metrics in
5 March and for 88% of the 223 metrics in April 2002. The details are
6 delineated in Attachment 1K, Items A.1.1.1 through A.4.2.

7
8 For the three-month period, February through April 2002, there were 204 sub-
9 metrics in the Resale measurements for which there was CLEC activity in all
10 three months and were compared to retail analogues or benchmarks. Of
11 those 204 sub-metrics, 179 sub-metrics (88%) met the retail
12 analogue/benchmark comparisons in at least two of the three months.

13
14 **1. Resale Ordering Measures**

15 **Reject Interval**

16 The benchmark for electronic rejects is 97% within 1 hour. In February 2002,
17 26,200 resale LSRs were rejected, with 87% meeting the relevant benchmark
18 or retail analogue. Of the 26,200 rejected LSRs, 71% were processed
19 electronically with 91% of them meeting the 1-hour benchmark interval. In
20 March 2002, 21,827 resale LSRs were rejected, with 90% meeting the
21 relevant benchmark or retail analogue. Of the 21,827 rejected LSRs, 66%
22 were processed electronically with 93% of them meeting the 1-hour

1 benchmark interval. In April 2002, there were a total of 16,957 resale LSRs
2 rejected, with 93% meeting the relevant benchmark. Of the 16,957 rejected
3 LSRs, 66% were processed electronically with 95% of them meeting the 1-
4 hour benchmark interval. See Attachment 1K, Items A.1.4 through A.1.8 for
5 further details.

6
7 **FOC Timeliness**

8 In February 2002, BellSouth issued FOCs for 76,781 resale LSRs and met
9 the relevant benchmark for 93% of them. Of the 76,781 FOCs returned,
10 57,899 were fully mechanized with 99.5% meeting the 3-hour benchmark
11 interval. In March, BellSouth issued FOCs for 72,739 resale LSRs and met
12 the relevant benchmark for 95% of them. Of the 72,739 FOCs returned,
13 54,602 were fully mechanized with 99.5% meeting the 3-hour benchmark
14 interval. In April 2002, BellSouth issued FOCs for 70,584 resale LSRs and
15 met the relevant benchmark for 97% of them. Of the 70,584 FOCs returned,
16 53,723 were fully mechanized with 99.6% meeting the 3-hour benchmark
17 interval. See Attachment 1K, Sections A.1.9 through A.1.13 for further
18 details.

19
20 The Resale Ordering sub-metrics for which BellSouth did not meet the
21 benchmarks/analogues for February, March and/or April 2002 were:
22

1 Reject Interval / Residence / Electronic (A.1.4.1) (February/March/April)

2 The current benchmark for this sub-metric is $\geq 97\%$ within one hour. In
3 February, 16,013 of the 17,576 total rejected LSRs met the one-hour
4 benchmark, and in March 2002, 12,603 of the 13,556 rejected LSRs in this
5 sub-metric met the benchmark interval. In April 2002, 9,890 of the 10,420
6 total rejected LSRs for this sub-metric met the 1-hour benchmark interval.

7
8 BellSouth's root cause analysis determined that a number of LSRs that did
9 not meet the one-hour benchmark were submitted when back-end legacy
10 systems were out of service and were unable to process the LSRs. Because
11 such LSRs should be excluded from the measurement, BellSouth
12 implemented a coding change in PMAP to ensure that scheduled OSS
13 downtime was properly excluded. This change was made with September
14 2001 data and was expected to improve sub-metric results for Reject Interval
15 performance.

16
17 The coding change assumed that EDI and TAG timestamps reflected Eastern
18 Time. However, the timestamps used by EDI and TAG actually reflected
19 Central Time. As a result of this discrepancy, an hour was being added
20 during PMAP timestamp "synchronization," which caused the results to
21 inaccurately reflect the reject Interval duration. A change to address this
22 issue for EDI was implemented effective with February 2002 data reporting,

1 and BellSouth implemented a similar change for TAG effective with April 2002
2 data. BellSouth's root cause analysis has determined that, had the scheduled
3 OSS downtime exclusion been properly implemented, BellSouth's Reject
4 Interval performance would generally have met the Commission's benchmark.

5
6 BellSouth's root cause analysis also identified an additional issue that impacts
7 the electronic Reject Interval sub-metrics. This issue arises when a fully
8 mechanized Firm Order Confirmation ("FOC") is followed by a manual
9 Clarification, a scenario that occurs when the Local Carrier Service Center
10 ("LCSC") must resolve specific types of errors after the issuance of the FOC.
11 This issue distorts the timeliness of BellSouth's electronic reject notices, and
12 BellSouth is currently analyzing this situation to determine an appropriate
13 solution.

14
15 Reject Interval / Business / Electronic (A.1.4.2) (February/March/April)

16 The current benchmark for this sub-metric is $\geq 97\%$ within one hour. In
17 February, 860 of the 920 rejected LSRs for this sub-metric met the one-hour
18 benchmark, and in March 2002, 765 of the 816 rejected LSRs met the 1-hour
19 benchmark. There were 824 LSRs rejected in this sub-metric in March 2002,
20 with 796 meeting the one-hour benchmark. BellSouth has conducted a
21 detailed root cause analysis of the process for electronic ordering. This
22 analysis addressed the ordering systems (EDI, TAG, and LENS) used by the

1 CLECs and the back-end legacy applications, such as SOCS, that are
2 accessed by the ordering systems. For further information see the
3 explanation included with the electronic reject interval measurement, item
4 A.1.4.1.

5
6 Reject Interval / Residence / Partial Electronic (A.1.7.1) (February/March)

7 BellSouth met the 10-hour benchmark interval for 4,386 of the 6,001 rejected
8 LSRs for this sub-metric in February and for 4,349 of the 5,523 rejected LSRs
9 in March 2002. BellSouth met the benchmark for this sub-metric in April
10 2002.

11
12 Reject Interval / PBX / Partial Electronic (A.1.7.4) (March)

13 There was only one LSR rejected for this sub-metric in March and two LSRs
14 rejected in April 2002. The small universe of orders for this sub-metric does
15 not provide a conclusive benchmark comparison. There was no CLEC
16 activity for this sub-metric in February 2002.

17
18 Reject Interval / Centrex / Manual (A.1.8.5) (April)

19 There were only two LSRs rejected for this sub-metric in April 2002. This
20 small universe does not provide a conclusive benchmark comparison.
21 BellSouth met the benchmark for this sub-metric in February and March 2002.

22

1 FOC Timeliness / Residence / Partial Electronic (A.1.12.1) (February/March)

2 BellSouth met the 10-hour benchmark interval for 11,303 of the 16,433 FOCs
3 returned for this sub-metric in February and for 12,470 of the 15,771 FOCs
4 returned in March 2002. BellSouth met the benchmark for this sub-metric in
5 April 2002.

6
7 FOC Timeliness / PBX / Partial Electronic (A.1.12.4) (April)

8 There was only one LSR rejected for this sub-metric in April 2002. This small
9 universe does not provide a conclusive benchmark comparison. There was
10 no CLEC activity for this sub-metric in either February or March 2002.

11
12 FOC Timeliness / ISDN / Partial Electronic (A.1.12.6) (March/April)

13 There was only one LSR rejected for this sub-metric in March and two LSRs
14 rejected in April 2002. The small universe of orders for this sub-metric does
15 not provide a conclusive benchmark comparison. BellSouth met the
16 benchmark for this sub-metric in February 2002.

17
18 FOC Reject & Response Completeness / ISDN / TAG / Electronic (A.1.14.6.2)
19 (February)

20 There was only one order for this sub-metric in February 2002. The small
21 universe for this sub-metric does not provide a conclusive benchmark

1 comparison. There was no CLEC activity for this sub-metric in March 2002.

2 BellSouth met the benchmark for this sub-metric in April 2002.

3
4 FOC Reject & Response Completeness / Residence / EDI / Partial Electronic

5 (A.1.15.1.1) (April)

6 BellSouth met the standard criteria for 31 of the 33 responses returned for
7 this sub-metric in April 2002. The 95% benchmark set a requirement that 32
8 of the 33 responses meet the criteria. BellSouth met the benchmark for this
9 sub-metric in February and March 2002.

10
11 FOC Reject & Response Completeness / Residence / Manual (A.1.16.1)

12 (March)

13 BellSouth met the completeness criteria for 672 of the 821 responses for this
14 sub-metric in March 2002. The 95% benchmark required that 780 of the 821
15 LSRs meet the criteria. BellSouth met the benchmark for this sub-metric in
16 February and April 2002.

17
18 FOC Reject & Response Completeness / Business / Manual (A.1.16.2)

19 (February/March/April)

20 BellSouth met the completeness criteria for 884 of the 933 responses for this
21 sub-metric in February, for 1,026 of the 1,093 responses in March and for 863
22 of the 913 responses in April 2002. The 95% benchmark required that 887 of

1 933 LSRs for February, 1,039 of the 1,093 LSRs for March and 868 of the
2 913 LSRs for April meet the criteria. BellSouth continues to focus on this
3 measurement in order to improve results to meet the benchmark.

4
5 FOC Reject & Response Completeness / Design (Specials) / Manual

6 (A.1.16.3) (February/March)

7 BellSouth met the completeness criteria for 112 of the 119 responses for this
8 sub-metric in February and for 102 of the 114 responses returned in March
9 2002. The 95% benchmark required that 114 of 119 LSRs for February and
10 109 of the 114 responses for March meet the criteria. BellSouth met the
11 benchmark for this sub-metric in April 2002.

12
13 FOC Reject & Response Completeness / PBX / Manual (A.1.16.4)

14 (February/March/April)

15 BellSouth met the completeness criteria for 30 of the 34 responses for this
16 sub-metric in February, for 32 of the 36 responses in March and for 35 of the
17 37 responses in April 2002. The 95% benchmark required that 33 of 34 LSRs
18 in February, 35 of 36 LSRs in March and 36 of 37 LSRs in April meet the
19 criteria. BellSouth continues to focus on this measurement in order to
20 improve results to meet the benchmark.

21
22 FOC Reject & Response Completeness / Centrex / Manual (A.1.16.5) (April)

1 There were only six LSR responses returned for this sub-metric in April 2002.
2 The small universe of orders for the month does not provide a conclusive
3 benchmark comparison. BellSouth met the benchmark for this sub-metric in
4 February and March 2002.

5
6 FOC Reject & Response Completeness / ISDN / Manual (A.1.16.6) (March)

7 BellSouth met the completeness criteria for 24 of the 27 orders for this sub-
8 metric in March 2002. The 95% benchmark required that 26 of 27 LSRs meet
9 the criteria. BellSouth met the benchmark for this sub-metric in February and
10 April 2002.

11
12 2. Resale Provisioning Measures

13
14 For the months of February, March and April 2002, BellSouth met or
15 exceeded the benchmark or retail analogue for 87%, 88% and 89%,
16 respectively, of all Resale provisioning measures. The details supporting the
17 April 2002 percentage are delineated in Items A.2.1.1.1.1 through
18 A.2.25.3.2.2 of Attachment 1K.

19
20 The following are the Resale provisioning measures for which BellSouth did
21 not meet the retail analogue in February, March and/or April 2002:

22

1 Order Completion Interval / Business / < 10 Circuits / Dispatch (A.2.1.2.1.1)

2 (February/March)

3 The average order completion interval for CLEC orders in this sub-metric for
4 February was 2.94 days for CLECs compared to 2.35 days for the retail
5 analogue and for March 2002 was 2.96 days for CLECS compared to 2.16
6 days for the retail analogue. These differences of less than one day, on
7 average, do not hinder the CLECs' ability to compete in this area. BellSouth
8 met the retail analogue comparison for this sub-metric in April 2002.

9
10 Order Completion Interval / PBX / >= 10 Circuits / Dispatch (A.2.1.4.2.1)

11 (February)

12 There was only one order for this sub-metric in February 2002. The small
13 universe of orders for this sub-metric does not provide a statistically
14 conclusive comparison to the retail analogue. BellSouth met the retail
15 analogue comparison for this sub-metric in March 2002. There was no CLEC
16 activity for this sub-metric in April 2002.

17
18 Order Completion Interval / PBX / >= 10 Circuits / Non-Dispatch (A.2.1.4.2.2)

19 (March)

20 There were only four orders for this sub-metric in March 2002. The small
21 universe of orders for this sub-metric does not provide a statistically
22 conclusive comparison to the retail analogue. BellSouth met the retail

1 analogue comparison for this sub-metric in April 2002. There was no CLEC
2 activity for this sub-metric in February 2002.

3

4 Order Completion Interval / Centrex / < 10 Circuits / Non-Dispatch

5 (A.2.1.5.1.2) (February)

6 There were only ten orders for this sub-metric in February 2002. The small
7 universe of orders for this sub-metric does not provide a statistically
8 conclusive comparison to the retail analogue. BellSouth met the retail
9 analogue comparison for this sub-metric in March and April 2002.

10

11 Order Completion Interval / ISDN / >= 10 Circuits / Non-Dispatch (A.2.1.6.2.2)

12 (March)

13 The average order completion interval for CLEC orders in this sub-metric for
14 March was 9.79 days compared to an average of 3.73 days for the retail
15 analogue. OCI is adversely affected by LSRs for which CLECs request
16 intervals beyond the offered interval. When a CLEC requests an interval
17 beyond the available interval offered by BellSouth, an "L" code should be
18 entered on the Service Order generated by BellSouth. Such "L" coded orders
19 are excluded from the OCI metrics. BellSouth met the retail analogue
20 comparison for this sub-metric in February and April 2002.

21

1 % Missed Installation Appointments / Residence / < 10 Circuits / Non-

2 Dispatch (A.2.11.1.1.2) (February/March/April)

3 BellSouth missed only 216 of the 55,392 installation appointments scheduled
4 for this sub-metric in February, missed 179 of the 57,811 appointments
5 scheduled for March and missed 146 of the 56,111 installation appointments
6 scheduled for April 2002. Both the CLECs and BellSouth retail had over 99%
7 of all orders completed as scheduled in February, March and April 2002.
8 When BellSouth provisions high quality service coupled with very large
9 universe sizes, it can cause an apparent out of equity condition from a
10 quantitative viewpoint. In these cases, there is very little variation and the
11 universe size is so large that the Z-test becomes overly sensitive to any
12 difference. In other words, the statistical test shows that the measurement
13 does not meet the fixed critical value when compared with the retail analogue,
14 but BellSouth's actual performance for both CLECs and its own retail
15 operations is at a very high level – in this case over 99%. From a practical
16 point of view, the CLECs' ability to compete has not been hindered even
17 though the statistical results may technically show that BellSouth failed to
18 meet the benchmark/analogue.

19
20 % Missed Installation Appointments / Business / < 10 Circuits / Dispatch

21 (A.2.11.2.1.1) (February/March/April)

1 BellSouth missed only 15 installation appointments out of the 393
2 appointments scheduled for this sub-metric in February, missed 12 of the 396
3 appointments scheduled in March and missed 16 of the 340 appointments
4 scheduled for April 2002. BellSouth completed between 95% and 97% of
5 appointments for both BellSouth retail and the CLECs over the three-month
6 period.

7
8 % Missed Installation Appointments / Business / < 10 Circuits / Non-Dispatch
9 (A.2.11.2.1.2) (February/March/April)

10 BellSouth missed only 7 of the 2,980 scheduled appointments for this sub-
11 metric in February, missed 17 of the 2,868 appointments scheduled for March
12 and missed 13 of the 3,227 installation appointments scheduled for April
13 2002. Both the CLECs and BellSouth retail had over 99% of all orders
14 completed as scheduled in all three months. From a practical point of view,
15 the CLECs' ability to compete has not been hindered even though the
16 statistical results may technically show that BellSouth failed to meet the
17 benchmark/analogue.

18
19 % Missed Installation Appointments / Design (Specials) / < 10 Circuits /
20 Dispatch (A.2.11.3.1.1) (April)

21 BellSouth completed 15 of the 17 installation appointments as scheduled in
22 April 2002. There were no systemic installation issues identified for the two

1 missed appointments. BellSouth met the retail analogue comparison for this
2 sub-metric in February and March 2002.

3
4 % Missed Installation Appointments / PBX / < 10 Circuits / Non-Dispatch

5 (A.2.11.4.1.2) (February)

6 BellSouth completed 25 of the 26 installation appointments as scheduled in
7 February 2002. There were no systemic installation issues identified for the
8 missed appointment. BellSouth met the retail analogue comparison for this
9 sub-metric in March and April 2002.

10
11 % Missed Installation Appointments / ISDN / < 10 Circuits / Non-Dispatch

12 (A.2.11.6.1.2) (February)

13 BellSouth completed 12 of the 13 scheduled appointments for this sub-metric
14 in February 2002. There were no patterns or systemic installation issues
15 identified for the missed appointment. BellSouth met the retail analogue
16 comparison for this sub-metric in March and April 2002.

17
18 % Provisioning Troubles w/i 30 days / Residence / < 10 Circuits / Non-

19 Dispatch (A.2.12.1.1.2) (February/March/April)

20 In February 2002, there were 2,654 troubles reported for the 61,307 orders
21 that completed in the prior 30 days. In March 2002, there were 2,520 troubles
22 reported for the 55,392 orders that completed in the prior 30 days. Thirty-six

1 percent of the February trouble reports and thirty-three percent of the March
2 reports were closed as “no trouble found.” In April 2002, there were 2,250
3 troubles reported for the 58,086 orders that completed in the prior 30 days.
4 Thirty percent of those troubles were closed as “no trouble found.” Sixty-five
5 percent of the total trouble reports for this sub-metric over the three-month
6 period were associated with one customer. With the exclusion of the “no
7 trouble found” reports, CLEC results for this sub-metric would have been
8 better than for the retail analogue in each of the three months. BellSouth is
9 conducting an analysis of the provisioning situation with CLECs and will
10 conduct joint sessions to determine how to reduce the number of “no trouble
11 found” reports.

12
13 % Provisioning Troubles w/i 30 days / Residence / >= 10 Circuits / Dispatch

14 (A.2.12.1.2.1) (February)

15 There was only one trouble report for this sub-metric in February 2002. The
16 small universe of orders for this sub-metric does not provide a statistically
17 conclusive comparison to the retail analogue. BellSouth met the retail
18 analogue comparison for this sub-metric in March and April 2002.

19
20 % Provisioning Troubles w/i 30 days / Business / < 10 Circuits / Dispatch

21 (A.2.12.2.1.1) (February/March)

1 In February 2002, there were 27 troubles reported for the 554 orders that
2 completed in the prior 30 days. Of the 27 troubles reported in February, 10
3 (37%) were closed as "no trouble found." In March 2002, there were 19
4 troubles reported for the 393 orders that completed in the prior 30 days. Of
5 the 19 troubles reported, 6 (32%) were closed as "no trouble found."
6 BellSouth met the retail analogue comparison for this sub-metric in April
7 2002.

8
9 % Provisioning Troubles w/i 30 days / Design (Specials) / < 10 Circuits /
10 Dispatch (A.2.12.3.1.2) (April)

11 There were only five troubles reported for this sub-metric in April 2002 for
12 orders that completed in the prior 30 days. The small universe of orders for
13 the month does not provide a statistically conclusive comparison to the retail
14 analogue. BellSouth met the retail analogue comparison for this sub-metric in
15 February and March 2002.

16
17 % Provisioning Troubles w/i 30 days / Centrex / < 10 Circuits / Dispatch
18 (A.2.12.5.1.1) (March)

19 There were only three troubles reported for this sub-metric in March 2002 for
20 orders that completed in the prior 30 days. The small universe of orders for
21 the month does not provide a statistically conclusive comparison to the retail

1 analogue. BellSouth met the retail analogue comparison for this sub-metric in
2 February and April 2002.

3
4 % Provisioning Troubles w/i 30 days / Centrex / < 10 Circuits / Non-Dispatch
5 (A.2.12.5.1.2) (April)

6 There were five troubles reported for this sub-metric in April 2002 for the 20
7 orders that completed in the prior 30 days. There were no systemic
8 installation issues identified for these trouble reports. BellSouth met the retail
9 analogue comparison for this sub-metric in February and March 2002.

10
11 Service Order Accuracy / Residence / < 10 Circuits / Dispatch (A.2.25.1.1.1)
12 (March)

13 BellSouth met the standard criteria for 129 of the 140 orders reviewed in this
14 sub-metric in March 2002. The 95% benchmark required that 133 of the 140
15 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
16 February and April 2002.

17
18 Service Order Accuracy / Residence / < 10 Circuits / Non-Dispatch
19 (A.2.25.1.1.2) (April)

20 BellSouth met the standard criteria for 132 of the 140 orders reviewed in this
21 sub-metric in April 2002. The 95% benchmark required that 133 of the 140

1 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
2 February and March 2002.

3
4 Service Order Accuracy / Residence / >= 10 Circuits / Dispatch (A.2.25.1.2.1)

5 (April)

6 BellSouth met the standard for 15 of the 17 orders reviewed in this sub-metric
7 for April 2002. The 95% benchmark required that all 17 of the 17 orders meet
8 the criteria. BellSouth met the benchmark for this sub-metric in February and
9 March 2002.

10
11 Service Order Accuracy / Business / < 10 Circuits / Dispatch (A.2.25.2.1.1)

12 (February/March)

13 BellSouth met the standard for 146 of the 155 orders reviewed in this sub-
14 metric in February and for 137 of the 150 orders reviewed in March 2002.
15 The 95% benchmark required that 148 of the 155 orders for February and
16 143 of the 150 orders for March meet the criteria, based on the quantity of
17 orders for the sub-metric. BellSouth met the benchmark for this sub-metric in
18 April 2002.

19
20 Service Order Accuracy / Business / < 10 Circuits / Non-Dispatch

21 (A.2.25.2.1.2) (March)

1 BellSouth met the standard for 122 of the 130 orders reviewed for this sub-
2 metric in March 2002. The 95% benchmark set a requirement of 124 of the
3 130 orders, based on the quantity of orders for this sub-metric. BellSouth met
4 the benchmark for this sub-metric in February and April 2002.

5
6 Service Order Accuracy / Business / >= 10 Circuits / Dispatch (A.2.25.2.2.1)
7 (April)

8 There were only nine orders reviewed for this sub-metric in April 2002. The
9 small universe of orders does not provide a conclusive benchmark
10 comparison. BellSouth met the benchmark for this sub-metric in February
11 and March 2002.

12
13 Service Order Accuracy / Business / >= 10 Circuits / Non-Dispatch
14 (A.2.25.2.2.2) (February/March)

15 BellSouth met the standard criteria for 15 of the 16 orders reviewed for this
16 sub-metric in February and for 11 of the 13 orders reviewed in March 2002.
17 The 95% benchmark set requirements of all 16 of the 16 orders in February
18 and all 13 of the 13 orders for March, based on the quantity of orders for this
19 sub-metric. BellSouth met the benchmark for this sub-metric in April 2002.

20
21 Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch
22 (A.2.25.3.1.1) (February/March/April)

1 BellSouth met the standard for 54 of the 60 orders reviewed for this sub-
2 metric in February, for 30 of the 37 orders reviewed for March and for 32 of
3 the 35 orders reviewed for April 2002. The 95% benchmark set requirements
4 of 57 of the 60 orders for February, 36 of the 37 orders for March and 34 of
5 the 35 orders for April, based on the quantity of orders for this sub-metric.
6 BellSouth continues to focus on this measurement to improve performance to
7 meet the benchmark for this sub-metric.

8

9 Service Order Accuracy / Design (Specials) / < 10 Circuits / Non-Dispatch

10 (A.2.25.3.1.2) (March/April)

11 BellSouth met the standard for 90 of the 98 orders reviewed for this sub-
12 metric in March and for 127 of the 134 orders reviewed in April 2002. The
13 95% benchmark set requirements of 94 of the 98 orders for March and for
14 128 of the 134 orders for April, based on the quantity of orders for this sub-
15 metric. BellSouth met the benchmark for this sub-metric in February 2002.

16

17 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Non-Dispatch

18 (A.2.25.3.2.2) (February/April)

19 BellSouth met the standard criteria for 14 of the 17 orders reviewed for this
20 sub-metric in February and for 18 of the 20 orders reviewed in April 2002.
21 The 95% benchmark set requirements of all 17 of the 17 orders for February

1 and for 19 of the 20 orders for April. BellSouth met the benchmark for this
2 sub-metric in March 2002.

3
4 **3. Resale Maintenance and Repair (M&R) Measures**

5
6 BellSouth met the relevant retail analogues for 89%, 84% and 94% of all the
7 Resale Maintenance & Repair measurements in February, March and April
8 2002, respectively. The sub-metrics for which BellSouth did not meet the
9 retail analogues were:

10
11 **Missed Repair Appointments / Residence / Non-Dispatch (A.3.1.1.2)**
12 **(March/April)**

13 BellSouth completed 1,787 of the 1,811 repair appointments as scheduled for
14 this sub-metric in March and completed 1,555 of the 1,596 appointments
15 scheduled for April 2002. BellSouth provided over 97% repair completion rate
16 for both CLECs and the retail analogue in both months. In March, 14 of the
17 24 reports (58%) were closed as "no trouble found." In April, 13 of the 41
18 reports (32%) were closed as "no trouble found." No other patterns or
19 systemic issues were identified for the missed repair appointments.
20 BellSouth met the retail analogue comparison for this sub-metric in February
21 2002.

22

1 Missed Repair Appointments / PBX / Non-Dispatch (A.3.1.4.2) (March)

2 BellSouth completed 10 of the 15 repair appointments as scheduled for this
3 sub-metric in March 2002. There were no patterns or systemic maintenance
4 issues identified for the five missed appointments for the month. BellSouth
5 met the retail analogue comparison for this sub-metric in February and April
6 2002.

7
8 Customer Trouble Report Rate / Residence / Dispatch (A.3.2.1.1)
9 (February/March/April)

10 There were 3,839 troubles reported for the 190,036 in service lines for this
11 sub-metric in February, 2,952 trouble reports for the 159,559 lines in service
12 in March and 2,917 trouble reports for the 157,650 lines in service in April
13 2002. Both the CLECs and BellSouth retail had no trouble reports for over
14 97% of the in service lines in all three months. There was less than 1%
15 difference in the report rates between retail and resale results for this sub-
16 metric for any of the three months. Many of the troubles due to wire and
17 facilities appear to be caused by CPE and/or CLEC problems. BellSouth
18 technicians will be trained on proper closeout procedures on troubles
19 involving CPE and CLEC interfaces.

20
21 Customer Trouble Report Rate / Residence / Non-Dispatch (A.3.2.1.2)
22 (February/March)

1 There were 2,280 troubles reported for the 190,036 lines in service for this
2 sub-metric in February and 1,811 troubles reported for the 159,559 lines in
3 service in February 2002. Both the CLECs and BellSouth retail had no
4 trouble reports for over 98% of the in service lines in either month. There was
5 less than 0.7% difference in the report rates between retail and resale results
6 for this sub-metric for the two months. Of the 2,280 total February trouble
7 reports, 1,668 reports (73%) were closed as “no trouble found.” Of the 1,819
8 total March trouble reports, 1,173 reports (65%) were closed as “no trouble
9 found.” Without these “no trouble found” reports, CLEC results would have
10 been better than for the retail analogue for this sub-metric in both months.
11 One CLEC generated 83% of the February trouble reports and 78% of the
12 March 2002 trouble reports for this sub-metric. BellSouth met the retail
13 analogue comparison for this sub-metric in April 2002.

14

15 Customer Trouble Report Rate / Business / Dispatch (A.3.2.2.1)

16 (February/March)

17 There were 631 trouble reports for the 6,772 lines in service for this sub-
18 metric in February and 383 troubles reported for the 5,832 lines in service in
19 March 2002. In February and March, 87 (14%) and 55 (14%), respectively, of
20 the trouble reports were closed as “no trouble found.” BellSouth met the retail
21 analogue comparison for this sub-metric in April 2002.

22

1 Customer Trouble Report Rate / Business / Non-Dispatch (A.3.2.2.2)

2 (February/March)

3 There were 335 troubles reported for the 6,772 lines in service for this sub-
4 metric in February and 193 troubles reported for the 5,832 lines in service in
5 March 2002. Of the 335 total February trouble reports, 225 (67%) of the
6 reports were closed as "no trouble found." Of the 193 total March trouble
7 reports, 110 (57%) of the reports were closed as "no trouble found."

8 BellSouth met the retail analogue comparison for this sub-metric in April
9 2002.

10
11 Customer Trouble Report Rate / Design (Specials) / Dispatch (A.3.2.3.1)

12 (March)

13 There were 36 troubles reported in March 2002 for the 2,717 lines in service
14 for this sub-metric. Both the CLECs and BellSouth retail customers received
15 over 98% trouble free service for the lines in service for this sub-metric for the
16 month. From a practical point of view, the CLECs' ability to compete has not
17 been hindered even though the statistical results may technically show that
18 BellSouth failed to meet the benchmark/analogue. BellSouth met the retail
19 analogue comparison for this sub-metric in February and April 2002.

20
21 Customer Trouble Report Rate / PBX / Non-Dispatch (A.3.2.4.2) (March)

1 There were only 15 trouble reports for the 7,292 in service lines for this sub-
2 metric in March 2002. BellSouth provided over 99.7% trouble free service for
3 both retail and the CLECs for this sub-metric in March. Of the 16 March
4 trouble reports, 11 (73%) were closed as "no trouble found." From a practical
5 point of view, the CLECs' ability to compete has not been hindered even
6 though the statistical results may technically show that BellSouth failed to
7 meet the benchmark/analogue. BellSouth met the retail analogue
8 comparison for this sub-metric in February and April 2002.

9
10 Maintenance Average Duration / PBX / Non-Dispatch (A.3.3.4.2) (March)

11 There were only 15 trouble reports for this sub-metric in March 2002. The
12 average repair interval for these 15 orders was 8.75 hours for CLEC orders
13 compared to 4.05 hours for the retail analogue. There were no patterns or
14 systemic maintenance issues identified for any of these orders. BellSouth
15 met the retail analogue comparison for this sub-metric in February and April
16 2002.

17
18 % Repeat Troubles within 30 Days / PBX / Non-Dispatch (A.3.4.4.2)

19 (February/March/April)

20 There were only 8 trouble reports for this sub-metric in February, 4 troubles
21 reported in March and 5 troubles reported in April 2002. The small universe

1 of orders for this sub-metric each month does not provide a statistically
2 conclusive comparison to the retail analogue.

3

4 % Repeat Troubles within 30 Days / ISDN / Dispatch (A.3.4.6.1) (February)

5 There was only one trouble report for this sub-metric in February 2002. The
6 small universe of orders for this sub-metric does not provide a statistically
7 conclusive comparison to the retail analogue. BellSouth met the retail
8 analogue comparison for this sub-metric in March and April 2002.

9

10 Out of Service > 24 Hours / Business / Dispatch (A.3.5.2.1) (April)

11 In April 2002, only 38 of the 370 service affecting repair orders for this sub-
12 metric were out of service longer than 24 hours. Of these 38 longer interval
13 orders, 17 of the trouble reports (45%) were received on Friday or Saturday
14 and were scheduled for and completed on Monday. BellSouth met the retail
15 analogue comparison for this sub-metric in February and March 2002.

16

17 Out of Service > 24 Hours / Business / Non-Dispatch (A.3.5.2.2) (February)

18 In February 2001, 10 of the 162 trouble reports were out of service longer
19 than 24 hours. Seven of the ten orders involved one customer and were out
20 of service due to a single switch failure. None of the remainder of the out of
21 service orders revealed any systemic maintenance issues. BellSouth met the
22 retail analogue for this sub-metric in March and April 2002.

1
2
3
4
5
6
7
8
9
10
11
12
13
14

II. Summary

As stated in the Introduction to the Analysis of Performance Measurements section, BellSouth met or exceeded the criteria for 737 of the 863 sub-metrics (85%) for which there was CLEC activity in February, for 741 of 874 sub-metrics (85%) in March and for 761 of 885 sub-metrics (86%) in April 2002.

During the three-month period of February through April 2002, there were a total of 799 sub-metrics that had CLEC activity for all three months and that were compared with either a benchmark or retail analogue. Of those 799 sub-metrics, 695 or 87% satisfied the comparison criteria for a minimum of two of the three months.