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August 30, 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: Docket No. 000121A-TP (OSS)

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Comments and Proposed Changes to the Performance Assessment Plan (PAP) For the Six-Month Review Process.

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

Sincerely,

J. Phillip Carver

J. Phillip Carver
(2E)

Enclosures

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

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U. S. Mail this 30th day of August, 2002 to the following:

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(+) Signed Protective Agreement

#237366

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In Re:	)	
	)	
Investigation into the	)	
Establishment of Operations Support	)	
Systems Performance Measures for	)	Docket No. 000121A-TP
Incumbent Local Exchange	)	
Telecommunications Companies	)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S COMMENTS AND PROPOSED CHANGES TO THE PERFORMANCE ASSESSMENT PLAN (PAP) FOR THE SIX-MONTH REVIEW PROCESS

BellSouth Telecommunications, Inc. ("BellSouth") hereby submits its Comments and Proposed Changes To The Performance Assessment Plan ("PAP") For The Six-Month Review Process, and states the following:

I. INTRODUCTION

By Notice dated July 9, 2002, the Staff of the Florida Public Service Commission ("Commission") requested that parties file any Comments and proposed changes to the PAP by August 30, 2002. The Notice also stated that Comments should address "the BellSouth Service Quality Measures and Plan Version 2.0 dated January 23, 2002, and the Self Effectuating Enforcement Mechanism Administrative Plan Version 2.3 dated January 30, 2002." (p. 1).

BellSouth proposes herein its changes to both the Service Quality Measurements Plan ("SQM") and to the Self-Effectuating Enforcement Mechanism Plan ("SEEM"). The proposed changes are described more specifically in a number of exhibits to these Comments.

Specifically, the proposed changes to the SQM are listed in detail on five exhibits to these Comments. Exhibit 1 includes substantive changes to the existing measures that are proposed by BellSouth. Exhibit 2 includes new measurements proposed by BellSouth. In some instances, these proposed new measurements are in addition to existing measurements; in other instances, they are to replace existing measures that BellSouth proposes to be deleted. Changes set forth in each of these two exhibits are discussed in greater detail below.

There are also three Exhibits that include proposed SQM changes that are either administrative in nature, or that implement either Orders of the Commission or the conclusions of the Third Party Auditor. Specifically, Exhibit 3 includes changes to the SQM that are administrative in nature, such as corrections in language, or typographical errors. These changes are intended to clarify the existing measures, but do not change the calculations of any measurement in any way. Exhibit 4 includes changes to the SQM that result from responses to the Exceptions and Observations of KPMG during the third party test. These changes relate to measurements for which the particular observation or exception has been closed. As additional items that are currently open are closed, BellSouth will attempt to add these during the course of the review process. Finally, Exhibit 5 includes new measurements that relate to Change Management. Three of these new measures were ordered by the Commission on August 9, 2002 in Order No. PSC-02-1094, PAA-TP. Three other changes were approved by the Commission during the August 9, 2002 Agenda Conference, but have not yet been memorialized in an Order by the Commission.

Again, BellSouth has provided in Section II a narrative description of both its proposed changes to existing measurements and proposed new measurements. BellSouth would also note that its proposed changes are based on the limited amount of data that has been generated since

the recent implementation of the PAP. To the extent that additional data generated on a monthly basis indicates that other changes are necessary, BellSouth will raise these changes as soon as possible in the course of the six month review.

II. BELLSOUTH'S PROPOSED CHANGES TO THE SQM

1. **OSS-1 Average Response Time and Response Interval (Pre-Ordering/ Ordering).** BellSouth proposes the addition of two Exceptions to this measurement: (1) "Scheduled OSS Maintenance," and (2) "Retail Usage of LENs." As to the first exception, Scheduled OSS Maintenance time should be excluded from this measure because ALECs should not send queries to a system when it is down for scheduled maintenance. Systems are unavailable during maintenance, and this maintenance is normally scheduled and conducted outside of regular business hours. Further, since BellSouth publishes the time it plans to conduct maintenance on its OSS, this is a known and usually fixed outage. Moreover, not excluding scheduled maintenance creates the potential for gaming by ALECs that might intentionally send queries when the system is down for scheduled maintenance. Thus, the time required for scheduled maintenance should be excluded from the measurement.

The second exclusion that BellSouth proposes is Retail Usage of LENS. Since some BellSouth Retail Operations have begun to use LENS to obtain pre-ordering information, this exclusion is now necessary. When these measures were first built, BellSouth Retail was not using the LENS system. All of the SQM reports are designed to keep the Retail data separate from the ALEC data. BellSouth Small Business agents plan to use LENS for pre-order/inquiry address validation and CSR inquiries. This will result in the commingling of the data concerning the retail LENS usage with the data regarding ALEC usage. To avoid this result, and to maintain

the integrity of the measure, retail usage of LENS must be factored out of the PMAP reports. This exclusion will preserve the necessary separation.

2. **OSS-2 Interface Availability (Pre-Ordering/ O ing); OSS-3 Interface Availability (Maintenance & Repair).** As a result of several Performance Measurement workshops conducted in Georgia in Docket 7892-U, *Performance Measurements for Telecommunications Interconnection, Unbundling and Resale*, BellSouth proposed in Georgia revisions to its measurements OSS-2 *Interface Availability (Pre-Ordering/ Ordering)* and OSS-3 *Interface Availability (Maintenance & Repair).* These revisions have now been incorporated into the recent GPSC Staff Performance Measurements Recommendation. During the course of the workshops, BellSouth responded to ALEC issues concerning the definitions, exclusions, business rules, and calculations for these measurements and proposed solutions that were accepted in the workshops. These discussions have continued during the 6-month review workshops in LA in Docket U-22252-C. Further, in the CLEC Coalition's filing of August 16, 2000, in Georgia Docket No. 7892-U, the CLEC Coalition states in regarding System Availability (OSS-2) that "CLECs recognize the improvements reached on this metric in Georgia for the time being but reserve the right to pursue further improvements in the future."

For OSS-2, BellSouth proposes to modify the definition to address the concerns expressed by ALECs regarding the meaning of the terms "Functional Availability" and "Scheduled Availability," which were not defined in the Definition of the measurement. Functional Availability is defined as the combined total number of hours per application/interface in the reporting period that the application/interface components are available to users. Scheduled Availability is defined as the combined total number of hours per application/interface in the reporting period that the application/interface are scheduled to be

available. In the Exclusions section, BellSouth proposes additional language to address troubles caused by factors outside of BellSouth's control, such as customer equipment and networks owned by other telecommunications companies.

BellSouth also seeks to add and define exclusions for degraded services outages and scheduled OSS maintenance. The exclusion for degraded service outages is appropriate because BellSouth already captures degraded service in OSS-1 *Average Response Time and Response Interval (Pre-Ordering/ Ordering)* and provides a report structure that demonstrates BellSouth performance against a benchmark. The exclusion for scheduled OSS maintenance is appropriate because (as described above in the context of OSS-1), ALECs should not expect the OSS to be available when there is a published and scheduled maintenance period. Accordingly, this time should be excluded from the measurement.

In the Business Rules Section, BellSouth proposes to add the words "loss of functionality" to the measure, consistent with the change to the measure discussed above. Lastly, BellSouth proposes to provide additional clarification to the SQM Disaggregation section by adding "per OSS Interface" to the Regional level of Disaggregation. This makes it clear that the result will be displayed by interface and not some other aggregation. BellSouth, also added additional application availability reporting for the following systems: LAUTO (ALEC), COFFI (CLEC/BellSouth), LNP LCSC GUI (ALEC/BellSouth) and L. \Cs (ALEC/BellSouth).

4. **O-1 Acknowledgement Message Timeliness**. BellSouth proposes two changes to this measurement. First, BellSouth proposes to add an exclusion for scheduled OSS maintenance for the reasons discussed above. Second, BellSouth proposes to modify the calculation for Average Response Interval. The goal of this measurement is to calculate how quickly the acknowledgement notice is returned, i.e., to compute the average interval in which

acknowledgement notices are returned. The current calculation for average response interval describes the numerator as the Sum of all Response Intervals. BellSouth proposes to add the words "for returned acknowledgements" to the sum of all response intervals in the numerator. This addition makes it clear that the measure only counts Acknowledgements Returned. (Of course, if the Acknowledgement is not returned, there is no interval.) Likewise, the denominator, which represents the total number of electronically submitted Messages / LSRs, must also be changed to include the acknowledgement notices returned in the reporting period.

5. **O-2 Acknowledgement Message Completeness**. BellSouth proposes to change the benchmark for this measurement to 99.5%. The current benchmark of 100% is unreasonably high and cannot be attained. The TAG application is a transaction-based interface between BellSouth OSS systems and ALECs at external locations. The gateway provides protocol translation and security services, but does not directly provide any of the business functionality. TAG was not designed to meet a 100% Completeness benchmark. If the CORBA connection is broken during transmission of a Functional Acknowledgement, TAG has no means to "restore" the connection. This connection can be broken from either end of the circuit through no fault of BellSouth. Thus, TAG has no "resend" capability to provide Functional Acknowledgements to ALECs when this happens. As a result, BellSouth will never pass the metric because the benchmark is at a standard (100%) that is above and beyond the capability of the original architecture of the application.

6. **O-3 Percent Flow-Through Service Requests (Summary); O-4 Percent Flow-Through Service Requests (Detail)**. For each of these measurements, BellSouth proposes to add an exclusion for scheduled OSS maintenance for the reasons discussed above. Again, because an LSR cannot flow through when the supporting OSS is down for maintenance, this

time should be excluded from the overall calculation. Also, BellSouth posts the scheduled down times on its website, and OSS maintenance is not scheduled during normal business hours.

7. **LSR Flow-Through Matrix** BellSouth proposes that the LSR Flow-Through Matrix be removed from the SQM. BellSouth also proposes to include in the SQM directions for locating the latest version of the Flow-Through Matrix on the PMAP website. The rollout of new products and the continued improvement in the numbers of products that flow through has resulted in the need for frequent changes to the Flow-Through Matrix. Since it is relatively difficult to change the SQM, the matrix should only be referenced in the measurement, and located on the PMAP website in order to allow necessary changes. Also, BellSouth would agree to notify the Commission before changing any product from "Yes" (it flows through) to "No" (it no longer flows through). The Flow-Through matrix is, of course, a tool that ALEC Service Representatives use during the ordering process. However, ALECs are very familiar with the PMAP website, and the latest version of the Flow-Through Matrix is already posted on the PMAP website. Thus, this change would have no negative impact on the ALECs' access to the matrix.

8. **O-7 Percent Rejected Service Requests; O-11 Firm Order Confirmation and Reject Response Completeness**. BellSouth proposes to exclude from these ordering measurements LSRs that are identified as projects. Projects are treated differently in the LCSC than other LCRs, and often require a Project Manager to coordinate and negotiate due dates and implementation. This coordination is outside of the normal LSR process. For this reason, projects should be excluded from 0-7 and 0-11.

Moreover, this exclusion currently applies to measures O-8, *Reject Interval* and O-9, *Firm Order Confirmation Timeliness,* the other Ordering measurements in BellSouth's SQM. In

order for BellSouth to synchronize the ordering measurements, the same programming logic needs to be applied consistently across the ordering measurements. Thus, for this additional reason, the exclusion of projects should be applied uniformly to ordering measures.

9. **O-9 Firm Order Confirmation Timeliness**. BellSouth proposes a modification to the standard for the measurement O-9, *Firm Order Confirmation Timeliness.* This measurement already utilizes a benchmark rather than a retail analog because there is nothing in BellSouth's processing of orders that is comparable to the return of an FOC. Certain aspects of BellSouth's ordering process and the ordering process are comparable. However, when performing the ordering process in its retail operations, BellSouth does not perform an electronic facilities check. BellSouth has noted that changing the business rules to require an electronic facilities check for the availability of facilities prior to providing the Firm Order Confirmation creates a difference in this process. The fact that facilities are unavailable would be subsequently determined, but not necessarily within the timeframe in which (in the comparable process for ALECs) an FOC would be returned. BellSouth discussed this issue in the October 2001 SQM Compliance Workshops and raised the issue that the interval may need to be adjusted (i.e., lengthened) in light of the addition of this electronic facility check process, combined with the shortened interval and elevated benchmarks for partially mechanized and non-mechanized orders. BellSouth still believes that allowances need to be made for the time involved in the facility check process.

In the Commission's Order on BellSouth's Motion for Reconsideration, BellSouth was directed to raise this issue in the six-month review process if BellSouth believes it needs more time to perform facilities checks. BellSouth has begun analysis of the impact of the electronics facilities checks on performance and has the first two months of data, May and June 2002, to

review. Since BellSouth is in the midst of its analysis, BellSouth believes it is premature to propose a precise change to the standard at this time, but would request the opportunity to file the analysis during the course of the permanent metrics six-month review process. Based on this analysis, BellSouth will address during the upcoming review process any need for allowances to the FOC measurement standards.

10. **P-2 Average Firm Order Confirmation Timeliness.** BellSouth proposes to split measurement P-2; *Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices* into two measures: P-2A *Jeopardy Notice Interval* and P-2B *Percentage of Orders Given Jeopardy Notices*. Under this approach, BellSouth would report its performance with respect to the amount of advance notice provided to ALECs when a committed due date is in jeopardy and the percentage of orders for which jeopardy notices are issued under two separate measures rather than the current measure, P-2. Measure P-2A would be based on the calculation of a mean. Measure P-2B would be reported as a percentage. The proposed exclusions, calculations, report structure and disaggregation for the two new measurements is included in Exhibit 2.

BellSouth also proposes to add two exclusions to measure measurement P-2A: (1) orders for which a jeopardy is identified on the due date; (2) Orders issued with a due date of 48 hours or less. The first proposed exclusion would only apply when the technician is on the premises attempting to provide service and must refer the order to Engineering or Cable Repair due to a facility jeopardy. Both of these exclusions are appropriate because the current standard is a benchmark with an interval of 48 hours or less. Clearly it is impossible to provide a jeopardy notice 48 hours in advance if the order is due in less than 48 hours.

11. **P-3A Percent Missed Installation Appointments Including Subsequent Appointments; P-3 Percent Missed Installation Appointments**. BellSouth proposes to eliminate measurement P-3A *Percent Missed Installation Appointments Including Subsequent Appointments* and replace it with the measurement P-3, *Percent Missed Installation Appointment.* P-3 differs from P-3A in that it does not include subsequent appointments. Measuring missed installation appointments from the first committed due date is the more appropriate process, and subsequent appointments, whether missed or made, should not be included. By including subsequent appointments, P-3A increases the number of appointments in the denominator as well as the misses in the numerator. Also, including subsequent appointments in the Percent Installation Appointment measurement affects both the subject measure, the Average Order Completion Notice Interval Measurement, both of which are included in the penalty plan. Furthermore, even if an initial due date is missed, the order completion interval is still being accrued for that order, regardless of whether the subsequent appointment is met or missed. Thus the order completion interval becomes longer.

12. **P-4A Average Order Completion and Completion Notice Interval (AOCCNI) Distribution; P-4 Average Completion Interval & Order Completion Interval** BellSouth proposes to return to the original OCI measure. The P-4A measure ordered by the Commission combines the Order Completion Interval (OCI) and the Order Completion Notice Interval (AOCNI), but does not add any real value to the Order Completion Interval measure. Further, it does not provide a true indication of how well BellSouth provides provisioning to the ALEC. The SQM contains discrete measures designed to capture the performance of the different parts of the ordering, provisioning and maintenance processes. Florida now has the FOC interval to measure the ordering interval, the OCI +AOCNI, which measures the provisioning interval and

the interval from completion to notification, and the AOCNI that measures just the notification interval. Thus, the current P-4A, in conjunction with other measures, involves an inappropriate duplication in the Plan, and it should be changed for this reason.

Further, as BellSouth has explained previously, BellSouth does not actually electronically notify its customers of completion when a service order is complete. The service technician notifies a retail end user customer before completing the order; when the customer belongs to a ALEC, the service technician calls the ALEC before completing the order. In the case of a ALEC, when the order completion status changes from CP to CPX an electronic notice is sent to the ALEC and the CSOTS database is updated showing the order complete. Historically, Average Order Completion Notice Interval (AOCNI) has been measured in hours and the Order Completion Interval is measured in days. By structuring the measure as in P-4A, (i.e., including Average Order Completion and Completion Notice Interval (AOCCNI)) the original AOCNI is masked altogether. The intervals are changed into minutes, added together and changed back to days. Except in those rare instances in which AOCNI pushes the interval over to another day, the AOCNI disappears. To more accurately gauge BellSouth's performance for Ordering and Provisioning processes, the Commission should require BellSouth to report each part discretely: Firm Order Confirmation (FOC), Order Completion Interval (OCI) and Average Order Completion Notice Interval (AOCNI).

BellSouth has begun analysis of the impact of the P-3A Percent Missed Installation Appointments, including Subsequent Appointments and P-4A Average Order Completion and Completion Notice Interval (AOCCNI) and has the first two months of data, May and June 2002, to review. Since BellSouth is in the midst of its review, BellSouth would request the opportunity to file this analysis during the course of the permanent metrics six-month review process. By

comparing reported data from both P-3 and P-3A and both P-4 and P-4A, BellSouth will have an assessment of these measures, to validate what impact, if any, these business rules have on BellSouth performance. BellSouth requests the opportunity to address the results of this performance analysis during the upcoming review process.

13. **P-12 LNP- Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution; P-13B LNP- Average Time Out of Service for LNP Conversions; P-13C LNP- Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date**. BellSouth proposes to eliminate measure P-12, *LNP-Average Disconnect Timeliness Interval and Disconnect Timeliness Interval Distribution.* In place of this measurement, BellSouth proposes two new Local Number Portability (LNP) measurements; P-13B, *LNP- Average Time Out of Service for LNP Conversions* and P-13C, *LNP- Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date.* BellSouth is proposing these replacement measurements because the current measure: (1) does not accurately capture the customer's experience when the customer's telephone number is ported; and (2) includes activities in the porting process over which BellSouth has no control.

Again, BellSouth proposes to implement P-13B *LNP- Average Time Out of Service for LNP Conversions* and P-13C *LNP- Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date.* The proposed measure P-13B *LNP- Average Time Out of Service for LNP Conversions Minutes* is based on measure 100 from the Texas Plan Version 1.6. The proposed measure P-13C *LNP- Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date* is based on measure 97 from the Texas Plan Version 1.6. The combination of these metrics more accurately measures BellSouth's performance of the

functions over which it has control, and the aspects of BellSouth's performance that effect service to the ALEC and its end user/customer.

Local number portability ("LNP"), of course, allows a customer to keep his or her telephone number when telephone service is transferred from one local exchange company to another. The number portability feature works by utilizing a centralized database that houses all ported numbers and provides proper routing of calls to and from these numbers. When an order involving LNP is being worked to port a telephone number from BellSouth to the ALEC, both BellSouth and the ALEC must take certain actions in order to enable the ALEC's new end user to make and receive calls using the ported number.

On a great majority of LNP orders, BellSouth creates what is referred to as a "trigger" in conjunction with the order. This trigger gives the end user customer the ability to make and receive calls from other customers who are served by the customer's host switch at the time of the LNP activation. This ability is not dependent upon BellSouth working a disconnect order. In other words, when a trigger is involved, an end user customer can receive calls from other customers served by the same host switch before the disconnect order is ever worked.

On trigger orders, end user customers also can make and receive calls from customers not served by the same host switch before BellSouth works the disconnect order. This is because all the switches in the BellSouth network other than the host switch are updated via routing data that is delivered to each of BellSouth's Service Control Point ("SCP") databases. These routing messages are delivered by a system known as LSMS, which is operated by and under the control of BellSouth. Thus, the end user has the full ability to make and receive telephone calls on ported numbers involving a trigger as soon as the LSMS message is sent to all SCPs, even

though BellSouth has not yet disconnected the customer from its translations in the BellSouth host switch.

However, as it currently exists, Performance Measure P-12 does not recognize the importance of triggers and their effect on the LNP process. Rather, the current measure calculates the end time of the LNP activity as the processing of the actual disconnect order in the host switch, even though, from a customer's perspective, this activity is totally meaningless. It is the activation of the LNP and the routing function accomplished by the LSMS that ultimately determines whether the end user is back in full service and is able to make and receive calls when a trigger is used in porting a telephone number.

Technical limitations in some switches prevent triggers from being created for some classes of service, most of which involve more complex services. In these cases, all of the switches in BellSouth's network are updated via messages to the SCPs, except for the home switch. In the case of the home switch, the customer's ability to receive calls from other customers served by his or her home switch is dependent on the processing of the disconnect order after receipt of the number ported message from the NPAC database. However, the timeliness of the disconnect is not under BellSouth's control. For example, the ALEC may begin the porting process for a customer without notifying BellSouth or conduct the porting process after hours (which ALECs are doing with greater frequency today). In either case, the porting process may begin and end without BellSouth becoming aware of the need to complete the disconnect order in the home switch, making it impossible for BellSouth to meet the time frames established by this Commission.

13. **B-4 Usage Data Delivery Completeness; B-5 Usage Data Delivery Timeliness; B-6 Mean Time to Deliver Usage**. BellSouth proposes that benchmarks be adopted for these three billing measures, rather than retail analogs. While these three measures attempt to compare BellSouth's performance for delivery of usage data for itself to delivery of usage data for ALECs, completely different processes are used, which makes a valid comparison impossible. Specifically, BellSouth obtains usage data from CMDS files, which is created in a fundamentally different manner than ODUF and ADUF, from which ALECs obtain usage data. The inappropriateness of a retail analog is underscored by the significant difference in usage volumes being delivered. For example, in July 2001, BellSouth delivered 40.304 billing messages for its retail units; this compares with more than 220 million billing messages BellSouth delivered for the ALECs.

Under these circumstances, the use of benchmarks is more appropriate for these billing measures. This is consistent with the approach used in both New York and Texas. *See, e.g.*, SWB Performance Measurement Business Rules, Version 2.0, Measurement 19 (Daily usage Feed Timeliness); New York Performance Assurance Plan metrics and Corresponding Metric Guidelines, BI-1 (Timeliness of Daily Usage Feeds).

14. **TGP-1 Trunk Group Performance – Aggregate; TGP-2 Trunk Group Performance – ALEC Specific.** BellSouth proposes several changes to measures TGP-1, Trunk Group Performance - Aggregate and TGP-2, Trunk Group Performance - ALEC Specific. BellSouth proposes to add four exclusions to each measure. The first proposed exclusion is "trunk groups blocked due to ALEC network/equipment failure". BellSouth should not be held responsible for blockage if there is a documented ALEC equipment failure, over which BellSouth has no control. BellSouth has received communication from ALECs with information

regarding equipment failures, mechanized reports showing ALEC equipment problems, and data records demonstrating conditions that are not possible unless the ALEC equipment is malfunctioning or out of service. One such example is when the trunk group has no traffic, and no existing calls on it, but shows that it is blocking new calls. These communications demonstrate the need for the proposed change. Clearly trunk group blockage related to ALEC equipment failures should be excluded from this measure.

The second proposed exclusion is "trunk groups blocked due to ALEC delayed or refused orders." BellSouth should not be held responsible for trunk group blockage resulting from ALEC delays in providing service, for example, when ALEC equipment is not ready on the due date of the order. The third proposed exclusion is for "trunk groups blocked due to unanticipated significant increases in ALEC traffic." If BellSouth is not informed by ALECs about capacity issues in a reasonable time frame, trunk blockage can result. BellSouth uses both standard intervals and negotiated intervals for projects as the standard for minimum notification time. BellSouth should not be responsible for trunk blockage that occurs because it is not notified by the ALEC in a timely manner.

Fourth, BellSouth proposes to add an exclusion for "final groups actually overflowing, not blocked." ALECs can request an arrangement that allows the final trunk group to overflow, and not block calls. ALECs provide written authorization for this arrangement. When this arrangement is requested, BellSouth should not include this blockage in the measurements since traffic on the final trunk groups is actually overflowing.

Also, BellSouth proposes a technical change to the retail analog, which currently refers to trunk blockage for "any two hour period in 24 hours." BellSouth believes that the reference to a "two hour period" makes it clear that the subject interval is a consecutive two hour period.

However, to make this explicitly clear, BellSouth proposes to choose the language to refer to "any two consecu' 'our period in 24 hours."

Finally, the BellSouth affecting trunk categories should be modified to capture all the trunk groups associated with local traffic that may experience blocking. Currently, the only "BellSouth affecting" trunk category reflected in these measures is category 9, which includes BellSouth End Office to BellSouth End Office trunks. BellSouth may also carry local traffic on trunks referenced in categories, 1, 10, and 16, and these categories should also be included in the measure. Category 1 trunks are from BellSouth End Offices to BellSouth Access Tandems, Category 10 trunks from BellSouth End Offices to the BellSouth Local Tandem. Also, at present, only a portion of the common trunk groups from a BellSouth Tandem to a BellSouth Tandem, Category 16, relating to the ALEC is coun' ' in this measure. For consistency purposes, Category 16 trunk groups should be added to the list of "BellSouth affecting categories" as well.

15. **C-2 Collocation Average Arrangement Time**. BellSouth proposes to change the Business Rule for this measurement to define the end time as the time when BellSouth notifies the ALEC, not when the ALEC accepts the arrangement. BellSouth should not be held responsible for meeting a measurement in which a portion of the process being measured is outside of its control, which is the case with this measurement as it is currently written. Under the current definition, the interval is not over until the ALEC accepts the arrangement. Thus, an ALEC could simply elect to delay acceptance of the collocation arrangement until after the required interval and thereby cause BellSouth to miss the benchmark. To give an example, BellSouth has attached as Exhibit 6, a document (redacted so as not to disclose the identity of the collocators) that shows numerous instances in which collocation spaces were ready for ALEC acceptance for quite some time before ALEC acceptance. A review of the document shows that

of these particular instances, the shortest number of days between space readiness and acceptance is eight, and the longest is 733, i.e., slightly longer than two years.

III. SEEM PLAN CHANGES

BellSouth proposes to modify the enforcement provisions of the Performance Assessment Plan currently in effect in Florida, i.e., the SEEM (Self Effectuating Enforcement Mechanism) Plan. BellSouth will file a detailed SEEM plan prior to the September 25, 2002 workshop and offers a summary of the plan here for Staff's consideration.

BellSouth's proposal in Florida is transaction-based, which is consistent with the direction given by the Commission in the Performance Measurements Order (PSC-01-1819-FOF-TP). Transaction-based plans structured similar to the plan BellSouth will propose in Florida, have been ordered by the State Commissions in Georgia, Louisiana, Kentucky, Alabama, Mississippi and South Carolina. Similar plans have also been ordered by the Commissions in North Carolina and Tennessee as interim enforcement plans until specific plans in those states can be implemented.[1] Not only have the eight State Commissions endorsed a plan similar to the BellSouth's proposal for Florida, in its approval of BellSouth's application for In-Region, InterLATA Services in Georgia and Louisiana, the FCC found the SEEM plans adequate to insure good performance.

> [w]e find that the existing Service Performance Measurements and Enforcement Mechanisms (SEEM plans) currently in place for Georgia and Louisiana provide assurance that these local markets will remain open after BellSouth receives section 271 authorization. (CC Docket 02-35, Released May 15, 2002, Paragraph 291)

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[1] The North Carolina Utilities Commission ordered a transaction based plan structured similar to the plan being proposed by BellSouth in Florida. Parties to the NC proceeding are currently negotiating the specific measurements to be included in that plan. The Tennessee Regulatory Authority adopted Florida's existing SEEM

> We conclude that the Georgia and Louisiana SEEM plans provide sufficient incentives to foster post-entry checklist compliance. (Paragraph 293)

BellSouth's proposal includes a calculation of remedies, which will vary with the severity of the failure, and the amount of the remedy per failure will vary by the type of process being measured and by the duration (or repetitiveness) of the failure. BellSouth's proposal for Florida departs from the plans in the other BellSouth states as it incorporates an adjustment to the fee schedule to accommodate a minimum payment amount for small ALECs, as suggested by the Staff.

Also, in a Notice from Staff dated July 29, 2002, Comments were requested by the parties on a number of issues. These issues are addressed in the attached Exhibit 7.

IV. CONCLUSION

For the foregoing reasons, BellSouth asks the Commission to adopt BellSouth's proposed modifications to the Performance Assessment Plan.

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plan. While the permanent plans in these two states are being developed, both states ordered the Georgia SEEM plan as an interim enforcement plan.

Respectfully submitted, this 30th day of August, 2002.

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EXHIBIT 1

BellSouth Service Quality Measurement Plan (SQM)

Florida Performance Metrics

Measurement Descriptions
Version 2.01

BellSouth Proposed Changes

Issue Date: August 30, 2002

Section 1: Operations Support Systems (OSS)

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

Change Proposed:

BellSouth proposes to add the following exceptions to this measure:

Scheduled OSS Maintenance

Retail Usage of LENs

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

Change Proposed:

BellSouth proposes to make the following changes to the Definition:

Percent of time ~~OSS interface~~ application is functionally available compared to scheduled availability. Calculations are based upon availability of applications and interfacing applications utilized by CLECs for pre-ordering and ordering. Availability percentages for ~~CLEC interface~~ systems utilized by CLECs and for ~~all Legacy systems~~ applications accessed by them are captured. ("Functional Availability" is defined as ~~the amount of time in~~ combined total number hours per application / interface ~~during~~ in the reporting period that ~~the legacy systems~~ application / interface components are available to users. ~~The planned System~~ Scheduled Availability is defined as the combined total number of hours per application / interface in the reporting period ~~the time in hours per day~~ that ~~the legacy system is~~ application / interface are scheduled to be available.)

Supporting data for this measurement will be made available upon request.

Change Proposed:

BellSouth proposes to add the following exclusions to this measure:

- CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc.
- Degraded service outages which are defined as a critical function that is normally performed by the CLEC or is normally provided by an application or system available to the CLEC, but with significantly reduced response or processing time.
- Scheduled OSS Maintenance

Change Proposed:

BellSouth proposes to make the following changes to the Business Rules:

Change the phrase "Only full outages are included ..." to "Only full and loss of functionality outages are included ..."

Add the following sentences:

Loss of Functionality outages are defined as:

- A critical function that is normally performed by the CLEC or is normally provided by an application or system is temporarily unavailable to the CLEC.

Change Proposed:

BellSouth proposes to make the following changes to the SQM Disaggregation:

Change the SQM Disaggregation and the SEEM Disaggregation from "Regional Level" to "Regional Level, Per OSS Interface."

OSS-3: ~~Interface~~ OSS Availability (Maintenance & Repair)

Change Proposed:

BellSouth proposes to make the following change to the definition:

~~This measures the percentage of time the OSS Interface is functionally available compared to scheduled availability~~Availability percentage for the CLEC and BellSouth interface systems and for the legacy systems accessed by them are captured. ~~.~~Percent of time applications are functionally available as compared to scheduled availability. Calculations are based upon availability of applications and interfacing applications utilized by CLECs for maintenance and repair. "Functional Availability" is defined as the combined total number of hours per application / interface in the reporting period that application / interface components are available to users. "Scheduled Availability" is defined as as the combined total number of hours in the reporting period that application / interface components are scheduled to be available.

Change Proposed:

BellSouth proposes to add the following exclusions to this measure:

-CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc.
-Degraded service outages which are defined as a critical function that is normally performed by the CLEC or is normally provided by an application or system available to the CLEC, but with significantly reduced response or processing time.

Change Proposed:

BellSouth proposes to make the following changes to the Business Rules:

~~Note:~~ Only full outages are ~~used~~ included in the calculation ~~of Application Availability~~for this measure. ~~A f~~ Full outages are defined as occurences of either of the following: ~~is incurred when any of the following circumstances exists:~~

- ~~The a~~Application/interfacing application ~~or system~~ is down or totally inoperative.
- ~~The a~~Application ~~or system~~ is totally inoperative~~inaccessible~~, for ~~any reason, by the~~ customers attempting to~~who normally~~ access or use the application ~~or system.~~ This includes transport outages when they may be directly associated with a specific application.
- ~~More than one work center cannot access the application or system for any reason.~~
- ~~When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.~~
- ~~When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable.~~

Loss of Functionality outages are defined as:

A critical function that is normally performed by the CLEC or is normally provided by an application or system is temporarily unavailable to the CLEC.

Comparison to an internal benchmark provides a vehicle for determining whether or not CLECs and retail BellSouth entities are given comparable opportunities for use of maintenance and repair systems.

Section 2: Ordering

O-1: Acknowledgement Message Timeliness

Change Proposed:

BellSouth proposes to add the following exclusion for this measure:

- Scheduled OSS Maintenance

Change Proposed:

BellSouth proposes the following changes to the Calculation for this measure:

Average Response Interval = (c / d)

- c = Sum of all Response Intervals for returned acknowledgements
- d = Total number of electronically submitted Messages/LSRs received, via EDI or TAG respectively, for which Acknowledgement Notices were returned in the Reporting Period.

O-2: Acknowledgement Message Completeness

Change Proposed:

BellSouth proposes to change the benchmark to be 99.5 % for both the SQM and SEEM Disaggregations this measure

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

Change Proposed:

BellSouth proposes to add the following exclusion for this measure:

Scheduled OSS Maintenance

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

Change Proposed:

BellSouth proposes to add the following to the Exclusions for this measure:

Scheduled OSS Maintenance

LSR Flow Through Matrix

Change Proposed:

BellSouth requests that the matrix be removed from the SQM and include only directions for locating the latest version of the Flow-Through matrix on the PMAP website.

O-7: Percent Rejected Service Requests

Change Proposed:

BellSouth proposes to add the following items to the Exclusions for this measure:

- LSRs which are identified and classified as "projects"

O-9: Firm Order Confirmation Timeliness

Change Proposed:

BellSouth proposes to modify the standards for O-9 based on the results of the impact analysis of the electronic facilities checks on FOC performance. Since BellSouth is in the midst of its analysis, BellSouth believes it is premature to propose changes to the standard at this time but would requests the opportunity to file the analysis and address the allowances to the FOC measurement standards during the course of the permanent metrics six-month review process.

O-11: Firm Order Confirmation and Reject Response Completeness

Change Proposed:

BellSouth proposes to add the following items to the Exclusions for this measure:

- LSRs which are identified and classified as "projects"

P-3A	Percent Missed Installation Appointments Including Subsequent Appointments

Change Proposed:

BellSouth proposes to delete this measure.

P-3	Percent Missed Installation Appointments

Change Proposed:

BellSouth proposes to add this measure as outlined below:

P-3: Percent Missed Initial Installation Appointments

Definition

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

Exclusions

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

Business Rules

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

Calculation

Percent Missed Installation Appointments = (a / b) X 100

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

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Report in Categories of <10 lines/circuits >=10 lines/circuits (except trunks)
- Dispatch/Non-Dispatch

Data Retained

Relating to CLEC Experience

- CLEC Order Number and PON (PON)
- Committed Due Date (DD)
- Completion Date (CMPLTN DD)
- Status Type
- Status Notice Date
- Standard Order Activity
- Geographic Scope

Note: Code in parentheses is the corresponding header found in the raw data file.

Relating to BellSouth Performance

- Report month
- BellSouth Order Number
- Committed Due Date (DD)
- Completion Date (CMPLTN DD)
- Status Type
- Status Notice Date
- Standard Order Activity
- Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Analog/Benchmark
• Resale Residence	Retail Residence
• Resale Business	Retail Business
• Resale Design	Retail Design
• Resale PBX	Retail PBX
• Resale Centrex	Retail Centrex
• Resale ISDN	Retail ISDN
• LNP (Standalone)	Retail Residence and Business (POTS)
• INP (Standalone)	Retail Residence and Business (POTS)
• 2W Analog Loop Design	Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	Retail Residence and Business - POTS Excluding Switch-Based Orders
• 2W Analog Loop With LNP - Design	Retail Residence and Business Dispatch
• 2W Analog Loop With LNP- Non-Design	Retail Residence and Business - POTS Excluding Switch-Based Orders
• 2W Analog Loop With INP-Design	Retail Residence and Business Dispatch
• 2W Analog Loop With INP-Non-Design	Retail Residence and Business - POTS Excluding Switch-Based Orders
• UNE Digital Loop <DS1	Retail Digital Loop <DS1
• UNE Digital Loop >=DS1	Retail Digital Loop >=DS1
• UNE Loop + Port Combinations	Retail Residence and Business
- Dispatch In	Dispatch In
- Switch Based	Switch Based
• UNE Switch Ports	Retail Residence and Business (POTS)
• UNE Combo Other	Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
- Without Conditioning	Without Conditioning
- With Conditioning	With Conditioning (BellSouth does not offer this service to Retail)
• UNE ISDN (Includes UDC)	Retail ISDN - BRI
• UNE Line Sharing	ADSL Provided to Retail
• UNE Other Design	Retail Design
• UNE Other Non-Design	Retail Residence and Business
• Local Transport (Unbundled Interoffice Transport)	Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	Parity with Retail
• UNE Line Splitting	ADSL to Retail
• EELs	Retail DS1/DS3

SEEM Measure

SEEM	Tier I	Tier II
No		

SEEM Disaggregation	SEEM Analog/Benchmark

• Not Applicable..... Not Applicable

P-4A	Average Order Completion and Completion Notice Interval (AOCCNI) Distribution

Change Proposed:

BellSouth proposes to delete this measure.

P-4	Average Completion Interval (OCI) and Order Completion Interval Distribution

Change Proposed:

BellSouth proposes to add this measure as outlined below:

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

Definition

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

Exclusions

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

Business Rules

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

The interval breakout for UNE and Design is: 0-5 = 0 - <5, 5-10 = 5 - <10, 10-15 = 10 - <15, 15-20 = 15 - <20, 20-25 = 20 - <25, 25-30 = 25 - <30, >=30 = 30 and greater.

Calculation

Completion Interval = (a - b)

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

Average Completion Interval = (c / d)

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

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

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

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Dispatch/Non-Dispatch categories applicable to all levels except trunks
- Residence & Business reported in day intervals = 0, 1, 2, 3, 4, 5, 5+
- UNE and Design reported in day intervals =0-5, 5-10, 10-15, 15-20, 20-25, 25-30, >=30
- All Levels are reported <10 line/circuits; >=10 line/circuits (except trunks)
- ISDN Orders included in Non-Design

Data Retained

Relating to CLEC Experience

- Report Month
- CLEC Company Name
- Order Number (PON)
- Application Date & Time
- Completion Date (CMPLTN_DT)
- Service Type (CLASS_SVC_DESC)
- Geographic Scope

Note: Code in parentheses is the corresponding header found in the raw data file.

Relating to BellSouth Performance

- Report Month
- BellSouth Order Number
- Order Submission Date & Time
- Order Completion Date & Time
- Service Type
- Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Analog/Benchmark
• Resale Residence	Retail Residence
• Resale Business	Retail Business
• Resale Design	Retail Design
• Resale PBX	Retail PBX
• Resale Centrex	Retail Centrex
• Resale ISDN	Retail ISDN
• LNP (Standalone)	Retail Residence and Business (POTS)
• INP (Standalone)	Retail Residence and Business (POTS)
• 2W Analog Loop Design	Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	Retail Residence and Business - POTS Excluding Switch-Based Orders
• 2W Analog Loop With LNP - Design	Retail Residence and Business Dispatch
• 2W Analog Loop With LNP- Non-Design	Retail Residence and Business - POTS Excluding Switch-Based Orders
• 2W Analog Loop With INP-Design	Retail Residence and Business Dispatch
• 2W Analog Loop With INP-Non-Design	Retail Residence and Business - POTS Excluding Switch-Based Orders
• UNE Digital Loop <DS1	Retail Digital Loop <DS1
• UNE Digital Loop >=DS1	Retail Digital Loop >=DS1
• UNE Loop + Port Combinations	Retail Residence and Business
- Dispatch In	Dispatch In
- Switch Based	Switch Based
• UNE Switch Ports	Retail Residence and Business (POTS)
• UNE Combo Other	Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	
- Without Conditioning	<=5 Days
- With Conditioning	<=12 Days
• UNE ISDN (Includes UDC)	Retail ISDN - BRI
• UNE Line Sharing	ADSL Provided to Retail

- Local Interconnection Trunks ..... Parity with Retail
- UNE Line Splitting ..... ADSL to Retail
- UNE Other Design ..... Retail Design
- UNE Other Non-Design ..... Retail Residence and Business
- EELs ..... Retail DS1/DS3

SEEM Measure

SEEM	Tier I	Tier II
No		

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

P-10 Total Service Order Cycle Time

Change Proposed:

BellSouth proposes to delete this measure.

P-12 LNP – Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution

Change Proposed:

BellSouth proposes to delete this measure and replace it with two measures **P-13B**, LNP – Average Time Out of Service for LNP Conversions and **P-13C**, LNP – Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date.

Section 5: Billing

B-4: Usage Data Delivery Completeness

Change Proposed:

BellSouth proposes the following change to the SQM Disaggregation - Analog/Benchmark for this measure:

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	~~Parity With Retail~~ >=98% Within 30 Calendar Days

B-5: Usage Data Delivery Timeliness

Change Proposed:

BellSouth proposes the following change to the SQM Anaog/Benchmark for this measure: ~~"Parity with Retail"~~ with " >=95% Delivered Within 6 Calendar Days."

B-6: Mean Time to Deliver Usage

Change Proposed:

BellSouth proposes the following change to the SQM Analog/Benchmark for this measure: Replace "~~Parity with Retail~~" with " <= 6 days":

Section 9: Trunk Group Performance

TGP-1: Trunk Group Performance-Aggregate

Change Proposed:

BellSouth proposes the following change to the Exclusions for this measure: Add the following exclusions:

- Trunk Groups blocked due to CLEC network/equipment failure
- Trunk Groups blocked due to CLEC delayed or refused orders
- Trunk Groups blocked due to unanticipated significant increases in CLEC traffic
- Final groups actually overflowing, not blocked

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

CLEC Affecting Categories:

	Point A	Point B
Category 1	BellSouth End Office	BelSouth Access Tandem
Category 3:	BellSouth End Office	CLEC Switch
Category 4:	BellSouth Local Tandem	CLEC Switch
Category 5:	BellSouth Access Tandem	CLEC Switch
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

BellSouth Affecting Categories:

	Point A	Point B
Category 1	BellSouth End Office	BelSouth Access Tandem
Category 9:	BellSouth End Office	BellSouth End Office
Category 10	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

Change Proposed:

BellSouth proposes the following change to the SQM and SEEM Analog/Benchmark for this measure:

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
• CLEC Aggregate	Any 2 consecutive hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10 (where applicable), 16 for CLECs and 1, 9, 10 (where applicable) and 16 for BellSouth
• BellSouth Aggregate	Any 2 consecutive hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10 (where applicable), 16 for CLECs and 1, 9, 10 (where applicable) and 16 for BellSouth

TGP-2:	Trunk Group Performance – CLEC Specific

Change Proposed:

BellSouth proposes the following change to the Exclusions for this measure: Add the following exclusions:

- Trunk groups blocked due to CLEC network/equipment failure
- Trunk groups blocked due to CLEC delayed or refused orders
- Trunk groups blocked due to unanticipated significant increases in CLEC traffic
- Final groups actually overflowing, not blocked

Change Proposed:

BellSouth proposes the following change in the "Trunk Categorization" to the Business Rules for this measure:

CLEC Affecting Categories:

	Point A	Point B
Category 1:	BellSouth End Office	BellSouth Access Tandem
Category 3:	BellSouth End Office	CLEC Switch
Category 4:	BellSouth Local Tandem	CLEC Switch
Category 5:	BellSouth Access Tandem	CLEC Switch
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

BellSouth Affecting Categories:

	Point A	Point B
Category 1	BellSouth End Office	BellSouth Access Tandem
Category 9:	BellSouth End Office	BellSouth End Office
Category 10	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

Change Proposed:

BellSouth proposes the following change to the SQM and SEEM Analog/Benchmark for this measure:

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
• CLEC Trunk Group	Any 2 consecutive hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10 (where applicable), 16 for CLECs and 1, 9, 10 (where applicable) and 16 for BellSouth

Section 10: Collocation

C-2:	Collocation Average Arrangement Time

Change Proposed:

BellSouth proposes the following change to the SQM Definition and Business Rules:

Measures the average time (counted in calendar days) from receipt of a complete and accurate Bona Fide firm order) including receipt of appropriate fee if required) to thedate BellSouth completes the collocation arrangement and notifies the CLEC. ~~and the CLEC accepts the arrangement.~~

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EXHIBIT 2

BellSouth Service Quality Measurement Plan (SQM)

Florida Performance Metrics

Measurement Descriptions
Version 2.01

BellSouth Proposed New Measures

Issue Date: August 30, 2002

P-2A: Jeopardy Notice Interval

Definition

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

The interval is from the date/time the notice is released to the CLEC/BellSouth systems until 5pm on the due date of the order.

Exclusions

- Orders held for CLEC end user reasons
- Disconnect (D) & From (F) orders
- Orders with Jeopardy Notice when jeopardy is identified on the due date. This exclusion only applies when the technician on premises has attempted to provide service but must refer to Engineer or Cable Repair for facility jeopardy.
- Orders issued with a due date of < = 48 hours.

Calculation

Jeopardy Interval = a - b

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

Average Jeopardy Interval = c / d

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

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Mechanized Orders
- Non-Mechanized Orders
- Dispatch/Non-Dispatch
- Geograhic Scope
  - State, Region

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Analog/Benchmark
• Average Jeopardy Notice Interval	95% > = 48 hours
• Resale Residence	95% > = 48 hours
• Resale Business	95% > = 48 hours
• Resale Design	95% > = 48 hours
• Resale PBX	95% > = 48 hours
• Resale Centrex	95% > = 48 hours
• Resale ISDN	95% > = 48 hours
• LNP (Standalone)	95% > = 48 hours
• INP (Standalone)	95% > = 48 hours
• 2W Analog Loop Design	95% > = 48 hours
• 2W Analog Loop Non-Design	95% > = 48 hours
• 2W Analog Loop With LNP - Design	95% > = 48 hours
• 2W Analog Loop With LNP- Non-Design	95% > = 48 hours
• 2W Analog Loop With INP-Design	95% > = 48 hours

BellSouth Proposed New Measures

- 2W Analog Loop With INP-Non-Design ..... 95% > = 48 hours
- UNE Digital Loop <DS1 ..... 95% > = 48 hours
- UNE Digital Loop >=DS1 ..... 95% > = 48 hours
- UNE Loop + Port Combinations ..... 95% > = 48 hours
  - Dispatch In ..... Dispatch In
  - Switch Based ..... Switch Based
- UNE Switch Ports ..... 95% > = 48 hours
- UNE Combo Other ..... 95% > = 48 hours
- UNE xDSL (HDSL, ADSL and UCL) ..... 95% > = 48 hours
- UNE ISDN (Includes UDC) ..... 95% > = 48 hours
- UNE Line Sharing ..... 95% > = 48 hours
- UNE Other Design ..... 95% > = 48 hours
- UNE Other Non-Design ..... 95% > = 48 hours
- Local Transport (Unbundled Interoffice Transport) ..... 95% > = 48 hours
- Local Interconnection Trunks ..... 95% > = 48 hours
- UNE Line Splitting ..... 95% > = 48 hours
- EELs ..... 95% > = 48 hours

SEEM Measure

Seem	Tier I	Tier II
No		

SEEM Disaggregation — **SEEM Analog/Benchmark**

- Not Applicable ..... Not Applicable

P-2B: Percentage of Orders Given Jeopardy Notices

Definition

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

The Percent of Orders is the percentage of orders given jeopardy notices for facility delay in the count of orders confirmed in the report period.

Exclusions

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

Business Rules

When BellSouth can determine in advance that a committed due date is in jeopardy for facility delay, it will provide advance notice to the CLEC. The number of committed orders in a report period is the number of orders that have a due date in the reporting period. Jeopardy notices for interconnection trunks results are usually zero as these trunks seldom experience facility delays. The Committed due date is considered the Confirmed due date. This report measures dispatched orders only. If an order is originally sent as non-dispatch and it is determined there is a facility delay, the order is converted to a dispatch code so the facility problem can be corrected. It will remain coded dispatched until completion.

Calculation

Percent of Orders Given Jeopardy Notice = (a / b) X 100

- a = Number of Orders Given Jeopardy Notices in Reporting Period
- b = Number of Orders Confirmed (due) in Reporting Period

Percent of Orders Given Jeopardy Notice > = 48 hours = (c / d) X 100

- c = Number of Orders Given Jeopardy Notices in Reporting Period (electronic only)
- d = Number of Orders Given Jeopardy Notice > = 48 hours in Reporting Period (electronic only)

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Mechanized Orders
- Non-Mechanized Orders
- Dispatch/Non-Dispatch
  - Geograhic Scope
  - State, Region

Data Retained

Relating to CLEC Experience

- Report Month
- CLEC Order Number and PON
- Date and Time Jeopardy Notice sent
- Committed Due Date
- Service Type

BellSouth Proposed New Measures

Note: Code in parentheses is the corresponding header found in the raw data file.

Relating to BellSouth Performance

- Report Month
- BellSouth Order Number
- Date and Time Jeopardy Notice sent
- Committed Due Date
- Service Type

SQM Disaggregation - Analog/Benchmark

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

SEEM Measure

Seem	Tier I	Tier II
No		

SEEM Disaggregation	SEEM Analog/Benchmark

- Not Applicable .... Not Applicable

P-13B: LNP – Average Time of Out of Service for LNP Conversions

Definition

Average time to facilitate the LNP activation request in BellSouth's network.

Exclusions

- CLEC-caused errors
- NPAC caused errors unless caused by BellSouth
- Stand Alone LNP Orders with more than 500 number activations

Business Rules

The Start time is the Receipt of the NPAC broadcast activation message in BellSouth's LSMS. The End time is when the Provisioning event is successfully completed in BellSouth's network as reflected in BellSouth's LSMS. Calculate the total minutes of difference between the start time and end time in minutes for LNP activations during the reporting period.

Calculation

Time Out of Service = (a - b)

- a = LNP Conversion Stop Time
- b = LNP Conversion Start Time

Average Out of Service Time for LNP Conversions = (c / d) X 100

- c = Sum of all "Time out of Service" measures for the reporting period
- d = Total number of LNP activations for the reporting period

Report Structure

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

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	*SQM Analog/Benchmark*
• LNP (Standalone)	95% <= 60 Minutes unless a different industry guideline is established that will override the benchmark referenced here.

SEEM Measure

SEEM	*Tier I*	*Tier II*
No		

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

P-13C: LNP – Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date

Definition

Percentage of time BellSouth applies 10-digit trigger for LNP TNs prior to the due date.

Exclusions

Excludes CLEC or Customer caused misses or delays.

Business Rules

Obtain number of LNP TNs where the 10-digit trigger was applicable prior to due date, and the total number of LNP TNs where the 10-digit trigger was applicable.

Calculation

Percentage of 10-digit applications = (a / b) X 100

- a = Count of LNP TNs for which 10-digit trigger was applicable prior to due date
- b = Total LNP TNs for which 10-digit triggers were applied

Report Structure

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

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	*SQM Analog/Benchmark*
• LNP (Standalone)	95%

SEEM Measure

SEEM	*Tier I*	*Tier II*
No		

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

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EXHIBIT 3

BellSouth Service Quality Measurement Plan (SQM)

Florida Performance Metrics

Measurement Descriptions
Version 2.01

Proposed Administrative Changes

Issue Date: August 30, 2002

Section 1: Operations Support Systems (OSS)

Introduction

Change Proposed:

In the fourth paragraph of the Introduction section of the SQMP, BellSouth proposes to make the following change "This document is intended for use by someone with knowledge of the telecommunications industry, ..."

Rationale:

Correction.

Change Proposed:

In the fifth paragraph of the Introduction section of the SQMP, BellSouth proposes to make the following change: "Once it is approved, the most current copy of this document can be found on the web at URL: https://pmap.bellsouth.com in the ~~Help~~ Documentation Downloads folder.

Rationale:

Correction.

Report Publication Dates

Change Proposed:

In the last sentence of this section, BellSouth proposes to make the following change: "BellSouth shall retain the performance measurement ~~raw data files~~ Supporting Data Files (SDF) for a period of 18 months and further retain the monthly reports produced in PMAP for a period of three years.

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

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

Change Proposed:

In the Business Rules, BellSouth proposes to change the phrase: "...when the appropriate response is returned to the client application" to "when the appropriate response is received by the client application."

In the Business Rules, BellSouth proposes to add the following sentence: BellSouth will not schedule maintenance during the hours from 8:00 am until 9:00pm. Monday through Friday.

Rationale:

Clarification

Change Proposed:

BellSouth proposed to add the following formula to the Calculation section:

Percent Within Interval = (e/f) X 100

e = Sum of Response Times for Interval
f = Number of Legacy Requests During the Reporting Period for System

Rationale:

The PMAP reports have always had a Percent within Interval section. Somehow the calculation was never added to the SQM

Change Proposed:

BellSouth proposes to delete the OASISCAR, OASISLPC, and OASISMTN from the Legacy System Access Times table.

Rationale:

BellSouth requests that the OASISCAR, OAISLPC, and OASISMTN contracts be removed from the RNS table in this measure. These contracts have been captured by OASISBIG.

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

Change Proposed:

BellSouth proposes to change the title and calculation of this measure from "Interface Availability..." to "OSS Availability..."

Rationale:

Clarification: The term "Interface" is not well defined and may lead to confusion or interpretation issues. "OSS Availability" is a better term because "OSS" is widely used and defined throughout the SQM. In addition, the change is supported by GA Audit KPMG Exception 133.

Change Proposed:

BellSouth proposes to move the OSS Interface Availability and the SEEM OSS Interface Availability to Appendix C.

Rationale:

Administrative: The SQMP has become difficult to manage in a MS Word file with all the tables. BellSouth is transforming the SQMP to a tableless format with all tables in an Appendix. These tables are better managed in a separate file. This will have no impact on PMAP numbers.

OSS-3: ~~Interface~~ OSS Availability (Maintenance & Repair)

Change Proposed:

BellSouth proposes to change the title and calculation of this measure from "Interface Availability..." to "OSS Availability..."

Rationale:

Clarification: The term "Interface" is not well defined and may lead to confusion or interpretation issues. "OSS Availability" is a better term because "OSS" is widely used and defined throughout the SQM. In addition, the change is supported by GA Audit KPMG Exception 133.

Change Proposed:

BellSouth proposes to make the following change to the definition:

~~This measures the percentage of time the OSS Interface is functionally available compared to scheduled availability~~Availability percentage for the CLEC and BellSouth interface systems and for the legacy systems accessed by them are captured. ~~-~~Percent of time applications are functionally available as compared to scheduled availability. Calculations are based upon availability of applications and interfacing applications utilized by CLECs for maintenance and repair. "Functional Availability" is defined as the combined total number of hours per application / interface in the reporting period that application / interface components are available to users. "Scheduled Availability" is defined as the combined total number of hours in the reporting period that application / interface components are scheduled to be available.

Rationale:

Clarification: This measure is the same as OSS-2. The Definitions should be basically the same.

Change Proposed:

BellSouth proposes to make the following changes to the Calculation:

OSS Availability (a / b) X 100

- **a = Functional Availability** of front end systems
- **b = Scheduled Availability** of front end systems

Rationale:

Clarification: Changes made as a result of the GA CLEC/BST/GPSC SQM Workshops. This clarifies that the region report is based on the Functional Availability and Scheduled Availability of the front end systems.

Change Proposed:

BellSouth proposes to make the following changes to the SQM Disaggregation:

Change the SQM Disaggregation and the SEEM Disaggregation from "Regional Level" to "Regional Level, Per OSS Interface."

Rationale:

Clarification: Changes made as a result of the GA CLEC/BST/GPSC SQM Workshops. The region report disaggregates Per OSS Interface.

Change Proposed:

BellSouth proposes to move the OSS Interface Availability and the SEEM OSS Interface Availability to Appendix C and change the OSS Interface "LNP" to "LNP Gateway".

Rationale:

Administrative: The SQMP has become difficult to manage in a MS Word file with all the tables. BellSouth is transforming the SQMP to a tableless format with all tables in an Appendix. These tables are better managed in a separate file.

Clarification: The name LNP Gateway specifically identifies the interface.

OSS-4: Response Interval (Maintenance & Repair)

Change Proposed:

BellSouth proposes to make the following changes to the SQM Disaggregation:

Change the SQM Disaggregation and the SEEM Disaggregation from "Regional Level" to "Regional Level, Per OSS Interface."

Rationale:

Clarification: Changes made as a result of the GA CLEC/BST/GPSC SQM Workshops. The region report disaggregates Per OSS Interface.

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

Change Proposed:

BellSouth proposes to delete references to "LENS" and "RoboTAG" in the Business Rules.

Rationale:

Clarification: Current wording for Business Rules section contains references to LENS, RoboTAG, etc. that are incorrect. LENS and RoboTag are not part of this interval.

Change Proposed:

BellSouth proposes to make the following changes to the Data Retained for this measure:

Relating to CLEC Experience

- **Report Month**
- ~~**Legacy Contract**~~
- ~~**Response Interval**~~
- ~~**Regional Scope**~~

Total Number of Inquiries
SI Interval
State and Region

Rationale:

Clarification: BellSouth requests that the Data Retained section be changed to reflect the data actually retained for this measure. The current version is incorrect.

Section 2: Ordering

O-9: Firm Order Confirmation Timeliness

Change Proposed:

BellSouth proposes to make the following changes to the Definition for this measure:

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of a valid LSR or ASR to distribution of a Firm Order Confirmation. The interval will include an electronic facilities check.

Rationale:

Clarification: This is an error correction. Access Service Requests (ASRs) are submitted by CLECs, and processed through the EXACT system, for the ordering of trunks and access services.

O-12: Speed of Answer in Ordering Center

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

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

Under BellSouth: Delete **Business Service Center** Delete: **Residence Service Center**

Replace with **Retail Service Center (Business Retail Service Center + Residence Retail Service Center)**

Rationale:

Clarification: The analog is the weighted average of the BellSouth Buisness and Residence Service Centers.

Section 3: Provisioning

P-1: Mean Held Order Interval & Distribution Intervals

Change Proposed:

BellSouth proposes the following changes to the Exclusions for this measure:

- ~~Orders with appointment code of 'A' for Rural orders.~~
- Orders with an Appointment Code of "A", i.e. orders for locations requiring special construction including locations where no address exists and a technician must make a field visit to determine how to get facilities to the location.

Rationale:

Clarification

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

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

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

P-3: Percent Missed Initial Installation Appointments

(This metric was not ordered by FPSC)

Change Proposed:

BellSouth proposes the following change to the Exclusions for this measure:

- **Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)** Order types may be coded C, N, R, or T.

Rationale:

Clarification: Ordered by the FPSC

Change Proposed:

BellSouth proposes to add the following to the Report Structure for this measure:

- **Dispatch/Non-Dispatch (except Trunks)**

Rationale:

Clarification: This change to the SQM accurately reflects the code and the process. The PMI report has never been disaggregated by Dispatch and Non-Dispatch for Trunks. It is one report and this request is to make the SQMP match the reports.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

Change Proposed:

BellSouth proposes the following changes to the SQM Disaggregation – Analog/Benchmark for this measure:

SQM LEVEL of Disaggregation	SQM Analog/Benchmark
• UNE ISDN ~~(Includes UDC)~~	Retail ISDN - BRI
• UNE UDC / IDSL	Retail ISDN – BRI and PRI
• UNE Line Splitting	ADSL Provided to Retail

Rationale:

Clarification:

P-3A: Percent Missed Installation Appointments Including Subsequent Appointments

Change Proposed:

BellSouth proposes the following changes to Report Structure for this measure:

- **Dispatch/Non-Dispatch (except Trunks)**

Rationale:

Clarification: This change to the SQM accurately reflects the code and the process. The PMI report has never been disaggregated by Dispatch and Non-Dispatch for Trunks. It is one report and this request is to make the SQMs match the reports.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

Change Proposed:

BellSouth proposes the following changes to the SQM Disaggregation – Analog/Benchmark for this measure:

SQM LEVEL of Disaggregation	SQM Analog/Benchmark
• UNE ISDN (~~Includes UDC~~)	Retail ISDN - BRI
• UNE UDC / IDSL	Retail ISDN – BRI and PRI
• UNE Line Splitting	ADSL Provided to Retail

Rationale:

Clarification

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

(This metric not ordered by the FPSC)

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

- ~~Residence & Business reported in day intervals = 0, 1, 2, 3, 4, 5, 5+~~
- ~~ISDN Orders included in Non-Design~~

Rationale:

Clarification: The two deleted lines do not apply to this measure and were copied from an old SQM. It has been corrected previously. These changes correct errors in the SQM and have no impact on the numbers.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

Change Proposed:

BellSouth proposes the following changes to the SQM Disaggregation – Analog/Bemchmark section of this measure:

The Retail Analog to UNE Digital Loop >=DS1 incorrectly shows the analog as Retail Digital Loop <= DS1 and needs to be corrected to >=DS1.

Rationale:

Error Correction: This is the result of a typographical error.

P-4A: Average Order Completion and Completion Notice Interval (AOCCNI) Distribution

Change Proposed:

BellSouth proposes the following changes to the Business Rules for this measure:

The interval breakout for UNE is:1,2,3,4,5+ and Design is: 0 - < =5, >5 - < = 10, > 10 - < = 15, > 15 - <= 20, > 20 - < = 25, > 25 - < = 30, >30

~~0-5 = 0 - <5, 5-10 = 5 - <10, 10-15 = 10 - <15, 15-20 = 15 - <20, 20-25 = 20 - <25, 25-30 = 25 - <30, >=30 = 30 and greater.~~

Rationale:

Administrative change for clarification purposes only. These changes correct errors in the SQM and have no impact on the numbers.

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

- ~~**Residence & Business reported in day intervals = 0, 1, 2, 3, 4, 5, 5+**~~
- **UNE and Design reported in day intervals = ~~0-5, 5-10, 10-15, 15-20, 20-25, 25-30, >=30~~ 0 - < =5, >5 - < = 10, > 10 - < = 15, > 15 - <= 20, > 20 - < = 25, > 25 - < = 30, >30**
- ~~**ISDN Orders included in Non-Design**~~
- Geographic Scope
- State

Rationale:

Clarification: The two deleted lines do not apply to this measure and were copied from an old SQM. It has been corrected previously. These changes correct errors in the SQM and have no impact on the numbers.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

Change Proposed:

BellSouth proposes the following changes to the SQM Disaggregation – Analog/Bemchmark section of this measure:

The Retail Analog to UNE Digital Loop >=DS1 incorrectly shows the analog as Retail Digital Loop <= DS1 and needs to be corrected to >=DS1.

Rationale:

Error Correction: This is the result of a typographical error.

P-5: Average Completion Notice Interval

Change Proposed:

BellSouth proposes the following changes to the Business Rules for this measure:

~~For non-mechanized orders the end time will be date and timestamp of order update from the FAX record via LON or C-SOTS system.~~ For the

retail analog, the start time is when the technician completes the order and the end time is when the order status is changed to complete in SOCS.

Rationale:

Clarification

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

- **Reporting intervals in Hours; 0, 1- < = 2, > 2 - < = 4, > 4 - < = 8, > 8 - <= 12, > 12 - <=24, > 24 plus Overall Average Hour Interval ~~1-2, 2-4, 4-8, 8-12, 12-24, >=24 plus Overall Average Hour Interval (The categories are inclusive of these time intervals; 0-1 = 0 - 0.99; 1-2 =1 - 1.99; 2-4 = 2 - 3.99, etc.)~~**

Rationale:

Clarification: These changes correct errors in the SQM and have no impact on the numbers.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

Change Proposed:

BellSouth proposes the following changes to the SQM Disaggregation – Analog/Bemchmark section of this measure:

The Retail Analog to UNE Digital Loop >=DS1 incorrectly shows the analog as Retail Digital Loop <= DS1 and needs to be corrected to >=DS1.

Rationale:

Error Correction: This is the result of a typographical error.

P-7: Coordinated Customer Conversions Interval

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

P-7A: Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval

Change Proposed:

BellSouth proposes the following changes to the Business Rules for this measure:

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

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

Rationale:

The Business Rule is incorrect as stated in this measure. This report measures the timeliness of the Start of the cut.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

P-7B: Coordinated Customer Conversions – Average Recovery Time

Change Proposed:

BellSouth proposes the following changes to the Calculation for this measure:

Average Recovery Time = (c / d)

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

Rationale:

Clarification: Troubles are always tracked by individual line or circuit.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

P-7C: Hot Cut Conversions – % Provisioning Troubles Received Within 7 Days of a Completed Service Order

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

P-8: Cooperative Acceptance Testing - % of xDSL Loops Successfully ~~Tested~~ Passing Cooperative Testing

Change Proposed:

BellSouth proposes to change the title of this measure by replacing the word "Tested" with the phrase "Passing Cooperative Tesing".

Rationale:

Clarification: Per the FPSC Order.

Change Proposed:

BellSouth proposes the following changes to the Definition for this measure:

A loop will be considered successfully cooperatively tested when both the CLEC and ~~ILEC~~ BellSouth representatives agree that the loop ~~has passed the cooperative testing.~~ meets the technical specifications set forth in TR 73600.

Rationale:

Clarification: This adds needed definition to the measure.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

P-9: % Provisioning Troubles within 30 days of Service Order Completion

Change Proposed:

BellSouth proposes the following changes to the Business Rules for this measure:

Measures the quality and accuracy of completed orders. The first trouble report ~~from a~~ received after service order ~~after~~ completion is counted in this measure.

Rationale:

Clarification

Change Proposed:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

P-10: Total Service Order Cycle Time (TSOCT)

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

Section 4: Maintenance & Repair

M&R-1: Missed Repair Appointments

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

Rationale:

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

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

Percentage of Missed Repair Appointments = (a / b) X 100

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

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

M&R-2: Customer Trouble Report Rate

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

Initial and repeated customer direct or referred customer troubles reported within a calendar month per 100 lines/circuits in service.

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

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

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

M&R-3: Maintenance Average Duration

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

Maintenance Duration = (a - b)

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

Average Maintenance Duration = (c / d)

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

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

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

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

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

total customer troubles closed reported

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

Percent Repeat Customer Troubles within 30 Days = (a / b) X 100

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

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Data Retained for this measure:

Relating to CLEC Experience

• Total and Percent Repeat Customer Trouble Reports within 30 Days (TOT_REPEAT)

Relating to BellSouth Performance

• Total and Percent Repeat Customer Trouble Reports within 30 Days

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

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

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

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

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

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

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

Out of Service (OOS) > 24 hours = (a / b) X 100

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

Rationale:

Clarification: The Service Quality Measurement Plan (SQM) document for M&R measures 1-5 doesn't always distinguish between measured "customer trouble reports" and "all trouble reports" (including exclusions). This change will identify "customer trouble reports" as appropriate, itn the SQM Plan document.

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

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

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

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

Rationale:

Clarification

Section 5: Billing

B-1: Invoice Accuracy

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

Invoice Accuracy = [(a - b) / a] X 100

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

Rationale:

Clarification: This change clarifies exactly what data is retained by BBI in reference to this measure for BellSouth performance and improves the accuracy of the calculation. It has no impact on the numbers.

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

- Number of Adjustments

Rationale:

Clarification

Change Proposed:

BellSouth proposes the following change to the Data Retained for this measure: change the phrase "Billing Related Adjustments" to "Total Billing Related Adjustments" for both CLEC Experience and BellSouth Performance.

Rationale:

Clarification - This change clarifies exactly what data is retained by BBI in reference to this measure for BellSouth performance and improves the accuracy of the calculation. It has no impact on the numbers.

B-2: Mean Time to Deliver Invoices

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

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

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

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

Rationale:

Clarification - This change corrects an error in the SQM. The Definition and Business Rules were inadvertently reversed in the FL 1/23/02 SQM.

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

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

Bill Distribution is calculated as follows: CRIS BILLS-The number of workdays is reported for CRIS bills. This is calculated by counting the Bill Period date as the first work day. Weekends and holidays are excluded when counting workdays.

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

Rationale:

Clarification - This change corrects an error in the SQM. The Definition and Business Rules were inadvertently reversed in the FL 1/23/02 SQM.

Change Proposed:

BellSouth proposes the following change to the SQM Analog/Benchmark for this measure:

SQM Analog/Benchmark

~~□CRIS based invoices will be released for delivery within six (6) business days.~~
~~□CABS based invoices will be released for delivery within eight (8) calendar days.~~
~~□~~CLEC Average Delivery Intervals for both CRIS and CABS Invoices are comparable to BellSouth Average delivery for both systems.

Rationale:

Clarification - This change corrects an error in the SQM. The deleted statements are invalid and in no way affect the measurement. This is a parity measurement . The CLEC results are compared with BST results.

B-4: Usage Data Delivery Completeness

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure: Remove "BellSouth Aggregate"

Rationale:

Clarification – BellSouth has no data in this measure.

Change Proposed:

BellSouth proposes the following change to the Data Retained for this measure: Replace "Report Month" and "Record Type" with " None."

Rationale:

Clarification – BellSouth has no data in this measure.

B-5: Usage Data Delivery Timeliness

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure: Remove "BellSouth Aggregate."

Rationale:

Clarification – BellSouth has no data in this measure.

Change Proposed:

BellSouth proposes the following change to the Data Retained for this measure: Replace "Report Month" and "Record Type" with " None."

Rationale:

Clarification – BellSouth has no data in this measure.

B-6: Mean Time to Deliver Usage

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure: Remove "BellSouth Aggregate":

Rationale:

Clarification – BellSouth has no data in this measure.

Change Proposed:

BellSouth proposes the following change to the Data Retained for this measure: Replace "Report Month" and "Record Type" with "None":

Rationale:

Clarification – BellSouth has no data in this measure.

B-7: Recurring Charge Completeness

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure: Add the following sentence:

The count of fractional recurring charges in the calculation refers to a sum of absolute total dollar values either billed on the correct bill or absolute value of total fractional recurring charges on the bill.

Rationale:

These changes correct and clarify the measure. They were discussed in the GA workshops held in November 2001.

B-8: Non-Recurring Charge Completeness

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure: Add the following sentence:

The count of non-recurring charges in the calculation refers to a sum of absolute total dollar values either billed on the correct bill or absolute value of total non-recurring charges on the bill.

Rationale:

These changes correct and clarify the measure. They were discussed in the GA workshops held in November 2001.

B-10: Percent Billing Errors Corrected in X Business Days

Change Proposed:

BellSouth proposes to change this measure by inserting "Business" before "Days" in the Title, Calculation, and Data Retained.

Rationale:

This change clarifies the SQM.

DUI-2: Percent Database Update Accuracy

Change Proposed:

BellSouth proposes the following change to the Data Retained/Relating to CLEC Experience section for this measure:

Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).

Rationale:

Clarification. Raw data is now referred to as Supporting Data Files (SDF).

Section 10: Collocation

C-1: Collocation Average Response Time

Change Proposed:

BellSouth proposes the following change to the Defintion for this measure:

Measures the average time (counted in calendar days) from the receipt of a complete and accurate collocation application (including receipt of application fee if required) to the date BellSouth returns a response electronically or in writing. Within ~~10~~ the number of calendar days as designated by the Collocation Order after having received a bona fide application for physical collocation, BellSouth must respond ~~as to whether space is available or not~~with space availability and a price quote.

Rationale:

This change is required because the C1 definition does not accurately describe the interval being measuered. The eror was discovered while providing a KPMG audit response.

C-2: Collocation Average Arrangement Time

Change Proposed:

BellSouth proposes the following change to the SQM Analog/Benchmark for this measure:

SQM Analog/Benchmark

- Virtual-Augment - ~~45~~ 60 Calendar Days (Without Space Increase)

Rationale:

Per Florida Collocation Order – PSC-00-0941-FOF-TP

Section 11: Change Management

CM-3: Timeliness of Documents Associated with Change

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

Measures whether CLECs received requirements or business rule documentation on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. ~~as set forth in the Change Control Process governed by the CLEC/BellSouth Review Board.~~

Rationale:

Clarification

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to documentation standards and time frames set forth in the Change Control Process a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

Rationale:

Clarification

CM-9: Number of Defects in Production Releases (Type 6 CR)

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects. ~~without a mechanized work around~~.

Rationale:

This is a correction to the Calculation section. The Definition and Business Rules sections refer to "number of Type 6 Severity 2 defects without a mechanized work around." This correction ensures consistency across the sections.

Appendix B: Glossary of Acronyms and Terms

Change Proposed:

BellSouth proposes to add the following terms and definitions to the Glossary of Acronyms and Terms:

BST-SDF:

BST Supporting (a.k.a. "Raw") Data File contain records captured in BellSouth Legacy Systems about activity initiated by BST customers. Supporting Data has been transformed from raw data to information (data with meaning). This supporting data represents records generated by BST Retail customers that are used in the calculation of SQM reports. These files contain confidential and proprietary business information. CLECs must submit a BST-SDF request form and sign a non-disclosure agreement before receiving these files.

OSDF:

Other Supporting Data Files contain a CLEC's initiated data/records "excluded" from the measures in each segment of the SQMP reports (Ordering, Provisioning and Maintenance, etc.). The OSDFs will also include partial and/or incomplete records if the CLEC can be identified. These files may be large and the CLEC will be responsible for having an appropriate computer and the software necessary to accept and make manipulation of the files possible. These files contain confidential and proprietary business information. CLECs must submit a OSDF request form to receive OSDFs.

SDF:

Supporting (a.k.a. "Raw") Data Files contain records captured in BellSouth Legacy Systems about activity initiated by CLECs or CLEC customers. Supporting Data has been transformed from raw data to information (data with meaning). This supporting data represents records generated by the CLECs that are used in the calculation of SQM and SEEM metrics, and, records that are specifically noted as exclusions in the "Exclusions" section of the SQM, if applicable.

Rationale:

Provide information on new terms used in the SQMP.

Appendix C: BellSouth Audit Policy

Change Proposed:

BellSouth proposes the following change to the Audit Policy:

The BellSouth PMQAP will ensure that BellSouth effectively and consistently provides accurate performance measurements data for the activities included in the SQM. The BellSouth Internal Audit department will audit this plan and its quality assurance steps annually ~~beginning in 4Q01~~.

Rationale:

Clarification

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EXHIBIT 4

BellSouth Service Quality Measurement Plan (SQM)

Florida Performance Metrics

Measurement Descriptions
Version 2.01

KPMG Proposed Changes

Issue Date: August 30, 2002

Section 1: Operations Support Systems (OSS)

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

Change Proposed:

BellSouth proposes to change "Average Response Time and Response Interval" to "Average Response Inteval and Percent Within Interval: in the Definition , Business Rules and Calculation in this measure.

New Definition: The average response interval and percent within interval is the average times and percent of requests responded to within certain intervals for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for Telephone numbers (TNs), and Customer Service Records (CSRs).

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

The response interval starts when the application (LENS or TAG for CLECs and RNS or ROS for BellSouth) submits a request to the legacy system and ends when the appropriate response is returned to the client application.

The percent of accesses to the legacy systems during the reporting period which take less than 2.3 seconds, the percent of accesses which take more than 6 seconds, and the percent which occur in less than or equal to 6.3 seconds are also captured.

New Calculation:

Percent Within Interval = (e/f) X 100

e = Sum of Response Times for Interval
f = Number of Legacy Requests During the Reporting Period for System

Rationale:

In KPMG's FL Observation 120 KPMG reported that the reported values for the response time intervals for the "Operations Support Systems: Average Response Time and Response Interval" SQM are reported as percentages and are inconsistent with the documented definition. BellSouth proposed these updates to the SQM Definition, Business Rules, and Calculations to reflect the way the measurement is reported.

Section 2: Ordering

O-1: Acknowledgement Message Timeliness

Change Proposed:

BellSouth proposes to make the following changes to the Definition for this measure:

This measurement provides the response interval and percent within interval from the time an ~~Message/~~ LSR or transmission (may contain multiple LSRs from one or more CLECs in multiple states) is electronically submitted via EDI or TAG until an acknowledgement notice is sent by the system.

BellSouth proposes to add the following formula to the Calculation for this measure:

Percent within Interval = (e / f) X 100

e = Total number of electronically submitted messages / LSRs received, from CLECs via EDI or TAG respectively, in the Reporting Period.
f = Total number of electronically submitted messages / LSRs acknowledged in the Reporting period.

Rationale:

In KPMG's FL Observation 112, KPMG determined that the formula specified in the "Ordering: Acknowledgement Message Timeliness" (SQM) document is inconsistent with the benchmark ordered by the FPSC (PMR2). These changes correct the deficiencies noted by KPMG.

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

Change Proposed:

BellSouth proposes to make the following changes to the Business Rules for this measure:

In the Manual Fallout table, change Item "3. Some Partial migrations" to "3. Some Partial migrations (All LNP partial migrations) " and add "14. LNP Only – Supplemental LSRs except Supps of 04 (Due Date changes) on Req Type CB"

Rationale:

In KPMG's FL KPMG Exception 121, KPMG determined that BellSouth did not specify that partial migrations included LNP partial migrations. BellSouth proposed these additions to the categories for Manual Fallout to address the omissions identified by KPMG.

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

Change Proposed:

BellSouth proposes to make the following changes to the Business Rules for this measure:

In the Manual Fallout table, change Item "3. Some Partial migrations" to "3. Some Partial migrations (All LNP partial migrations) " and add "14. LNP Only – Supplemental LSRs except Supps of 04 (Due Date changes) on Req Type CB"

Rationale:

In KPMG's FL KPMG Exception 121, KPMG determined that BellSouth did not specify that partial migrations included LNP partial migrations. BellSouth proposed these additions to the categories for Manual Fallout to address the omissions identified by KPMG.

Change Proposed:

BellSouth proposes to add Region to the Report Structure for this measure:

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

O-8: Reject Interval

Change Proposed:

BellSouth proposes to add the following sentence to the Definition for this measure:

When there are multiple rejects on a single LSR, the first reject issued is used for the calculation of the interval duration.

Rationale:

This issue was noted in KPMG's FL Exception 36. The sentence added to the definition clarifies which reject issued is used to calculate the interval duration.

Change Proposed:

BellSouth proposes to make the following changes to the Exclusions for this measure:

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

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

Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website:
http://www.interconnection.bellsouth.com/centers/html/lcsc.html (1)

Local Interconnection Service Center (LISC) - Monday through Friday 4:30 P.M. until 8:00 A M.
From 4:30 P.M.Friday until 8:00 A.M. Monday. Weekends and holidays are excluded from the calculation. The exclusion of weekends begins at 12:01 AM Saturday until 12:00 midnight Sunday. Holidays are excluded from 12:01 AM until midnight (2)

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

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

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

LSRs which are identified and classified as "coin" (3)

Rationale:

(1) In KPMG's FL Exception 36, KPMG noted that the SQM hours of operation did not reflect the hours of the centers. The LCSC hours change based on customer needs and to reflect retail hours of operation.

(2) In KPMG's FL Exception 56, KPMG found that BellSouth's implemented metrics calculations for Reject Interval – Trunks was inconsistent with the documented calculations. BellSouth amended the exclusions to include a statement that is consistent with its currently implemented duration calculations. This exclusion was also added to O-9, Firm Order Confirmation Timeliness, and O-10 Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual to provide consistency of exclusion language across similar measures.

(3) In response to KPMG's FL KPMG Exception 114, BellSouth noted that LRSs for coin services are not reported. BellSouth excludes these LSRs because they are for unregulated services.

O-9: Firm Order Confirmation Timeliness

Change Proposed:

BellSouth proposes to add the following note to the Business Rules for this measure:

Note: When multiple FOCs occur on a single LSR, the first FOC is used to measure the interval.

Rationale:

This issue was noted in KPMG's FL Exception 36. The sentence added to the definition clarifies which FOC issued is used to calculate the interval.

Change Proposed:

BellSouth proposes to make the following changes to the Exclusions for this measure:~~The following hours for Partially mechanized and Non-mechanized LSRs are excluded from the interval calculation:~~

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

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

Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website:
http://www.interconnection.bellsouth.com/centers/html/lcsc.html (1)

For ASRs processed in the Local Interconnection Service Center (LISC), ~~From 4:30 P.M. Friday until 8:00 A.M. Monday (ASRs received after 2:00PM will be counted as if received at 8:00AM the next business day.)~~ all hours outside of Monday – Friday 8:00 – 4:30 CST, should be excluded. (2)

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

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

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

LSRs which are identified and classified as "coin" (3)

Rationale:

(1) In KPMG's FL Exception 36, KPMG noted that the SQM hours of operation did not reflect the hours of the centers. The LCSC hours change based on customer needs and to reflect retail hours of operation.

(2) In KPMG's FL Exception 56, KPMG found that BellSouth's implemented metrics calculations for Reject Interval – Trunks was inconsistent with the documented calculations. BellSouth amended the exclusions to include a statement that is consistent with its currently implemented duration calculations. This exclusion was also added to O-9, Firm Order Confirmation Timeliness, and O-10 Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual to provide consistency of exclusion language across similar measures.

(3) In response to KPMG's FL KPMG Exception 114, BellSouth noted that LRSs for coin services are not reported. BellSouth excludes these LSRs because they are for unregulated services.

Change Proposed:

BellSouth proposes to make the following changes to the Report Structure for this measure:

Trunks:
0 - < = 5 days
>5 - < = 10 days
0 - < = 10 days
> 10 - < = 12 days
> 12 - < = 14 days
> 14 - < = 18 days
> 18 - <= 20 days
> 20 days
~~0 - <=48 hours~~
~~>48 hours~~
~~Average Interval is reported in business hours~~

Rationale:

In KPMG's FL Observation 129, KPMG found that there was a discrepancy in the structure of BellSouth's reported time buckets between SQM versions. BellSouth has updated the time buckets in Version 3.00 SQM.

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

Change Proposed:

BellSouth proposes to add the following item to the Exclusions for this measure:

For ASRs processed in the Local Interconnection Service Center (LISC), all hours outside of Monday-Friday, 8:00-4:30 CST, should be excluded

Rationale:

In KPMG's FL Exception 56, KPMG found that BellSouth's implemented metrics calculations for Reject Interval – Trunks was inconsistent with the documented calculations. BellSouth amended the exclusions to include a statement that is consistent with its currently implemented duration calculations. This exclusion was also added to O-9, Firm Order Confirmation Timeliness, and O-10 Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual to provide consistency of exclusion language across similar measures.

O-12: Speed of Answer in Ordering Center

Change Proposed:

BellSouth proposes to add Region to the Report Structure for this measure:

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

Section 3: Provisioning

P-1: Mean Held Order Interval & Distribution Intervals

Change Proposed:

BellSouth proposes the following changes to the Calculation for this measure:

Mean Held Order Interval = a / b

a = Sum of held-over-days for all Past Due Orders ~~Held for the reporting period~~with a BellSouth Missed Appointment from the earliest BST missed appointment
b = Number of Past Due Orders Held and Pending But Not Completed and past the committed due date

Rationale:

In the Georgia 3rd Party Test, KPMG noted in Exception #87, item 8, that BellSouth's computation methods prescribe the "held duration" as the difference between the report end date and the earliest commitment date for each service order. KPMG observed that this was inconsistent with the SQM Report calculation definiton. This change clarifies the calculation.

Change Proposed:

BellSouth proposes to add the following to the Report Structure for this measure:

- Geograhic Scope
- State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

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

Change Proposed:

BellSouth proposes to add the following changes to the Report Structure of this measure:

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-5: Average Completion Notice Interval

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-6: % Completions/Attempts without Notice or <24 hours Notice

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-7: Coordinated Customer Conversions Interval

Change Proposed:

BellSouth proposes the following changes to the Exclusions for this measure:

Test Orders

Rationale:

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure.

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-7A: Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval

Change Proposed:

BellSouth proposes the following changes to the Exclusions for this measure:

Test Orders

Rationale:

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

Change Proposed:

BellSouth proposes the following changes to the Business Rules for this measure: Add the following paragraph.

If IDLC is involved, a four-hour window applies to the start time. The on-time window represents a cut that begins <=2 hours or less before or after the scheduled start time. This only applies if BellSouth notifies the CLEC by 10:30 am on the day before the due date that the service is on IDLC.

BellSouth proposes the following changes to the Report Structure for this measure:

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

Percentages are reported in intervals of early, on time and late cuts for IDLC and non-IDLC cuts.

On Time (Non-IDLC)

<= 15 minutes
Note: This is a 30-minute bucket representing a cut that begins 15 minutes or less before or after the scheduled start time.

Early (Non-IDLC)

>15 minutes - <=30 minutes
>30 minutes - <=60 minutes
>60 minutes - <=120 minutes
>120 minutes - <=180 minutes
>180 minutes - <=240 minutes
<=240 minutes

Late (Non-IDLC)

>15 minutes - <=30 minutes
>30 minutes - <=60 minutes
>60 minutes - <=120 minutes
>120 minutes - <=180 minutes
>180 minutes - <=240 minutes
>240 minutes

Overall Average Interval for non-IDLC

On Time (IDLC)

<=2 hours
Note: This is a 4-hour bucket representing a cut involving IDLC that begins 2 hours or less before or after the scheduled start time.

Early (IDLC)

>2 hours

Late (IDLC)

>2 hours

Overall Average Interval for IDLC

Rationale:

This error was noted in KPMG Florida Observation #185. KPMG noted that the Report Structure needs to include time buckets for IDLC cuts. Percentages are reported in intervals of early, on time and late cuts for IDLC and non-IDLC cuts.

P-7B: Coordinated Customer Conversions – Average Recovery Time

Change Proposed:

BellSouth proposes the following changes to the Exclusions for this measure:

Test Orders

Rationale:

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-7C: Hot Cut Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order

Change Proposed:

BellSouth proposes the following changes to the Exclusions for this measure:

Test Orders

Rationale:

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change

Customer Conversions measurements.

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-8: Cooperative Acceptance Testing - % of xDSL Loops Successfully Tested

Change Proposed:

BellSouth proposes the following changes to the Exclusions for this measure:

Test Orders

Rationale:

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-9: % Provisioning Troubles within 30 days of Service Order Completion

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

Geograhic Scope
State, Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

P-11:	Service Order Accuracy

Change Proposed:

BellSouth proposes the following changes to the Report Structure for this measure:

Geograhic Scope
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

Section 4: Maintenance & Repair

M&R-1: Missed Repair Appointments

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

Geographic Scope
State
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

M&R-2: Customer Trouble Report Rate

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

Geographic Scope
State
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

M&R-3: Maintenance Average Duration

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

Geographic Scope
State
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

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

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

Geographic Scope
State
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

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

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

Geographic Scope
State
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

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

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

Geographic Scope
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

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

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

BellSouth will inform the CLEC and appropriate BellSouth personnel of any Network outages (key customer accounts).

Rationale:

In Florida Observation 133, KPMG noted that BellSouth's SQM document for this measure contained inconsistencies with the benchmark as ordered by the Florida PSC. KPMG noted that the calculation formulas measured the total time and mean time to notify the CLEC of network outages and that the definition and calculation suggested that only CLEC performance is measured. BellSouth proposed changes to the Definition, Business Rules, and Calculations to address the inconsistency.

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

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

Rationale:

In Florida Observation 133, KPMG noted that BellSouth's SQM document for this measure contained inconsistencies with the benchmark as ordered by the Florida PSC. KPMG noted that the calculation formulas measured the total time and mean time to notify the CLEC of network outages and that the definition and calculation suggested that only CLEC performance is measured. BellSouth proposed changes to the Definition, Business Rules, and Calculations to address the inconsistency.

Change Proposed:

BellSouth proposes the following change to the Calculation for this measure:

Time to Notify ~~CLEC~~ = (a - b)

a = Date and Time BellSouth NMC Notified both CLEC and BellSouth entities.
b = Date and time BellSouth NMC detected network incident

Mean Time to Notify ~~CLEC~~ = (c / d)

c = Sum of all Times to Notify both BST and CLEC
d = Count of all Network Incidents

Rationale:

In Florida Observation 133, KPMG noted that BellSouth's SQM document for this measure contained inconsistencies with the benchmark as ordered by the Florida PSC. KPMG noted that the calculation formulas measured the total time and mean time to notify the CLEC of network outages and that the definition and calculation suggested that only CLEC performance is measured. BellSouth proposed changes to the Definition, Business Rules, and Calculations to address the inconsistency.

Change Proposed:

BellSouth proposes the following change to the Report Structure for this measure:

Geographic Scope
Region

Rationale:

Preliminary information from KPMG's Adequacy Study indicates that the SQM is not specific as to the Report Structure for this measure. BellSouth will add Region to the Report Structure to provide for further clarification.

Change Proposed:

BellSouth proposes the following change to the SQM Disaggregation – Analog/Benchmark for this measure:

SQM Level of Disaggregation	Retail Analog / Benchmark
• BellSouth Aggregate	Parity ~~by Design~~with Retail
• CLEC Aggregate	Parity ~~by Design~~with Retail
• CLEC Specific	Parity ~~by Design~~with Retail

Rationale:

This change is in response to KPMG Observation 161. The CLECs are being notified via email and BST receives faxed notification consequently the process is not "Parity by Design," but "Parity with Retail."

Section 7: Database Update Information

D-2: Percent Database Update Accuracy

Change Proposed:

BellSouth proposes the following change to the Definition for this measure:

This report measures the accuracy of database updates by BellSouth for Line Information Database (LIDB) Directory Assistance and Directory Listings using a statistically valid sample of ~~LSRs/Orders~~ completed CLEC Service Orders in a manual review. This manual review is not conducted on BellSouth ~~Retail~~ Service Orders.

Rationale:

KPMG noted in KPMG Florida Observation 180 that BellSouth uses a statistically valid sample of completed CLEC Service Orders rather than a sample of original CLEC orders. BellSouth has updated the SQM language for both the Definition and Business Rules to clarify that it uses a statistically valid sample of completed CLEC Service Orders for this measure.

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

For each update ~~completed~~ reviewed during the reporting period, the original update that the CLEC sent to BellSouth is compared to the database following completion of the update by BellSouth. An update is "completed without error" if the database completely and accurately reflects the activity specified on the original and supplemental update (e.g., orders) submitted by the CLEC. Each database (e.g., LIDB, Directory Assistance and Directory Listings) should be separately tracked and reported.

A statistically valid sample of completed CLEC Service Orders ~~will be~~ is pulled each month. ~~The sample will be used to test the accuracy of the database update process. This is a manual process.~~

Rationale:

KPMG noted in KPMG Florida Observation 180 that BellSouth uses a statistically valid sample of completed CLEC Service Orders rather than a sample of original CLEC orders. BellSouth has updated the SQM language for both the Definition and Business Rules to clarify that it uses a statistically valid sample of completed CLEC Service Orders for this measure.

Section 10: Collocation

C-1:	Collocation Average Response Time

Change Proposed:

BellSouth proposes the following change to the Defintion for this measure:

Measures the average time (counted in calendar days) from the receipt of a complete and accurate collocation application (including receipt of application fee if required) to the date BellSouth returns a response electronically or in writing. Within ~~10~~ the number of calendar days as designated by the Collocation Order after having received a bona fide application for physical collocation, BellSouth must respond ~~as to whether space is available or not~~with space availability and a price quote.

Rationale:

This change is required because the C-1 definition does not accurately describe the interval being measuered. The error was discussed while providing a KPMG audit response on a conference call with KPMG on 3/15/02.

Section 11: Change Management

CM-2: Change Management Notice Average Delay Days

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

This metric is designed to compute ~~measure~~ the average delay days for ~~percent of~~ change management notices sent to the CLECs outside the ~~according to notification standards and~~ time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

Rationale:

In KPMG's Florida Observation 69 KPMG noted that the formula specified in the SQM document for the measure was inconsistent with the benchmarks ordered by the Florida PSC. BellSouth proposed the changes to the Business Rules to clarify the calculations as reported.

CM-4: Change Management Documentation Average Delay Days

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

This metric is designed to compute the average delay days for ~~measure the percent of requirements or~~ business rule documentation sent to the CLECs outside the ~~according to documentation standards and~~ time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

Rationale:

In KPMG's Florida Observation 69, KPMG noted that the formula specified in the SQM document for the measure was inconsistent with the benchmarks ordered by the Florida PSC. BellSouth proposed the changes to the Business Rules to clarify the calculations as reported.

CM-5: Notification of CLEC Interface Outages

Change Proposed:

BellSouth proposes the following change to the Business Rules for this measure:

~~This measure is designed to notify the CLEC of interface outages within 15 minutes of BellSouth's verification that an outage has taken place. This metric will be expressed as a percentage.~~

This metric measures the process of notifying CLECs of an interface outage as defined by the Change Control Process Documentation. BellSouth has 15 minutes to notify the CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur:

1. BellSouth can duplicate a CLEC reported error.

2. BellSouth finds an error message within the system error log that identifiably matches a CLEC reported outage.

3. When 3 or more CLECs report the identical type of outage.

4. BellSouth detects a problem due to the loss of functionality for users of a system.

Note: The 15 minute clock begins once a CLEC reported or a BellSouth detected outage has lasted for 20 minutes and has been verified. If the outage is not verified within 20 minutes, the clock begins at the point of verification.

This metric will be expressed as a percentage.

Rationale:

In KPMG's Florida Exception # 81 KPMG noted that BellSouth's stated Business Rules were ambiguous. Initially, BellSouth made changes to the Business Rules to clarify the definition of an outage as requested by KPMG Exception # 81. Since the closure of Florida Exception # 81, BellSouth has rewritten the Business Rules to provide additional clarification of the outage verification process.

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EXHIBIT 5

BellSouth Service Quality Measurement Plan (SQM)

Florida Performance Metrics

Measurement Descriptions
Version 2.01

Florida Ordered New Measures

Issue Date: August 30, 2002

CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at **http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html**, and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days = (a / b) x 100

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	95% within interval

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	95% within interval

CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

Exclusions

Change Requests that are canceled or withdrawn before a response from BellSouth is due.

Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at **http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html**,. The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days = (a / b) x 100

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	95% within interval

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	95% within interval

CM-8: Percent Change Requests Rejected

Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

Exclusions

Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html, These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent Change Requests Rejected = (a / b) x 100

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility

Industry Direction

Data Retained

- Report Period
- Requests Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	Diagnostic
• Reason – Cost	Diagnostic
• Reason – Technical Feasibility	Diagnostic
• Reason – Industry Direction	Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
No		

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

CM-9: Number of Defects in Production Releases (Type 6 CR)

Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

Exclusions

None

Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at **http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html.**

Calculation

The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region--Number of Type 6 Severity 1 defects	0 Defects
• Region--Number of Type 6 Severity 2 defects	0 Defects without a mechanized work around
• Region--Number of Type 6 Severity 3 defects	0 Defects

SEEM Measure

SEEM	Tier I	Tier II
No		

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

CM-10: Software Validation

Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

Exclusions

None

Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

The test deck senario weight table can be found in the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html.

Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transactions in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	<= 5%

SEEM Measure

SEEM	Tier I	Tier II
No		

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization

Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

Exclusions

- Change requests that are implementated later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

Calculation

Percent of Type 5 CLEC initiated Change Requests implemented on time = (a / b) x 100

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

Percent of Type 4 CLEC initiated Change Requests implemented on time = (a / b) x 100

- a = Total number of prioritized Type 4 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 CLEC initiated Change Requests from the date of the release prioritization list

Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeeks

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	95% within interval
• Type 4 requests implemented	95% within interval
• Type 5 requests implemented	95% within interval

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	95% within interval

EXHIBIT 6

NORTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

	TYPE	REFERENCE NUMBER	STATUS	APP BF DATE	QUOTE ISSUED TO CUSTOMER	FIRM ORDER BF DATE	PERMIT APPLIED	PERMIT OBTAINED	SPACE READY	SPACE ACCEPT	NUMBER OF DAYS SINCE SPACE READY
1	PHY	ORLDFLAP-FIM-07-1	SR	12-Apr-99	28-May-99	23-Jun-99	27-Dec-99	02-Jun-00	14-Jul-00		
2	PHY	COCOFLME-UTC-01-1	SR	08-Sep-00	21-Sep-00	25-Sep-00	17-Oct-00	30-Nov-00	14-Dec-00		
3	PHY	FTPRFLMA-FDW-01-1	SR	12-Jun-00	26-Jun-00	20-Jul-00	14-Sep-00	03-Jan-01	03-Jan-01		
4	PHY	EGLLFLBG-UTC-02-2	SR	31-Oct-00	12-Nov-00	06-Dec-00			19-Feb-01		
5	PHY	STRTFLMA-FDW-01-1	SR	12-Jun-00	26-Jun-00	20-Jul-00	28-Aug-00	09-Oct-00	11-Oct-00		
6	PHY	DYBHFLPO-PAI-02-1	SR	23-Aug-00	01-Sep-00	01-Sep-00	22-Sep-00	22-Oct-00	08-Nov-00		
7	PHY	DYBHFLPO-KMM-02-1	SR	13-Aug-99	31-Aug-99	18-Oct-99			06-Aug-99		
8	PHY	MNDRFLLO-FIM-01-2	SR	14-Feb-00	07-Apr-00	24-Apr-00			14-Jul-00		
9	PHY	ORLDFLPC-TIM-01-2	SR	02-Feb-00	03-Apr-00	27-Jun-00			10-Sep-00		
10	PHY	PNSCFLFP-NSC-02-1	SR	21-Apr-00	03-May-00	12-May-00			30-Jul-00		
11	PHY	DYBHFLPO-FDW-02-1	SR	06-Jul-00	18-Jul-00	31-Jul-00	23-Aug-00	08-Sep-00	15-Oct-00		
12	PHY	JCVLFLNO-PA-AEJ-100-03	SR	13-Jun-01	15-Jun-01	18-Jun-01			23-Jul-01		
13	PHY	DYBHFLPO-NSC-01-3	SR	10-Apr-00	01-May-00	08-May-00	25-May-00	30-May-00	14-Jul-00		
14	PHY	ORLDFLSA-TIM-01-1	SR	15-Dec-99	06-Mar-00	30-Mar-00	26-Apr-00	09-May-00	21-Jul-00		
15	PHY	PNSCFLBL-JAT-01-1	SR	13-Dec-99	25-Jan-00	08-Feb-00			01-May-00		
16	PHY	PNCYFLMA-NSC-01-1	SR	30-Oct-00	10-Nov-00	16-Nov-00	16-Nov-00	30-Nov-00	27-Feb-01		
17	PHY	PNSCFLFP-JAT-01-1	SR	13-Dec-99	16-Feb-00	01-Mar-00			24-May-00		
18	PHY	ORLDFLMA-ALN-01-1	SR	28-Feb-01	12-Mar-01	15-Mar-01	19-Apr-01	23-Apr-01	21-May-01		
19	PHY	MNDRFLLO-NPU-01-1	SR	19-Jul-99	22-Sep-99	12-Oct-99	17-Apr-00	27-Apr-00	24-Jul-00		
20	PHY	MLBRFLMA-FDW-01-1	SR	12-Jun-00	26-Jun-00	20-Jul-00	18-Aug-00	12-Oct-00	29-Nov-00		
21	PHY	JCVLFLNO-NVE-01-2	SR	10-May-00	15-May-00	23-May-00			06-Aug-00		
22	PHY	MNDRFLLO-BWI-01-3	SR	24-Jan-00		02-Apr-00			14-Jul-00		
23	PHY	COCOFLMA-UTC-01-1	SR	08-Sep-00	21-Sep-00	25-Sep-00			22-Dec-00		
24	PHY	DYBHFLMA-FDW-01-1	SR	12-Jun-00	26-Jun-00	20-Jul-00	16-Aug-00	08-Sep-00	15-Oct-00		
25	PHY	DYBHFLOB-FDW-01-1	SR	12-Jun-00	26-Jun-00	20-Jul-00	15-Aug-00	25-Aug-00	22-Sep-00		
26	PHY	EGLLFLBG-KMM-01-3	SR	19-Jun-00	30-Jun-00	24-Jul-00			11-Oct-00		
27	PHY	PNSCFLFP-MIV-02-1	SR	22-Jun-00	05-Jul-00	04-Aug-00			02-Oct-00		
28	PHY	EGLLFLIH-UTC-01-1	SR	08-Sep-00	21-Sep-00	25-Sep-00	26-Oct-00	11-Dec-00	11-Jan-01		
29	PHY	ORLDFLMA-PA-MKE-100-02	SR	11-Apr-01	20-Apr-01	29-May-01			30-Jul-01		
30	PHY	PNSCFLBL-OVC-01-2	SR	16-Aug-00	28-Aug-00	30-Aug-00			15-Jan-01		
31	PHY	MNDRFLLO-PA-UTC-100-01	SR	26-Mar-01	06-Apr-01	09-Apr-01			14-May-01		
32	PHY	ORLDFLPC-UTC-01-1	SR	11-May-99	02-Jun-99	23-Jun-99			10-Jan-00		
33	PHY	ORLDFLCL-PAI-02-1	SR	23-Aug-00	01-Sep-00	01-Sep-00	22-Sep-00	22-Oct-00	12-Nov-00		
34	PHY	MLTNFLRA-JAT-01-1	SR	13-Dec-99	22-Feb-00	08-Mar-00			01-Jun-00		
35	PHY	GSVLFLMA-FDW-01-1	SR	16-Jun-00	27-Jun-00	20-Jul-00	04-Aug-00	22-Sep-00	10-Nov-00		
36	PHY	VRBHFLMA-FDW-01-1	SR	12-Jun-00	26-Jun-00	20-Jul-00	18-Aug-00	11-Oct-00	29-Nov-00		

NORTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

	TYPE	REFERENCE NUMBER	STATUS	APP BF DATE	QUOTE ISSUED TO CUSTOMER	FIRM ORDER BF DATE	PERMIT APPLIED	PERMIT OBTAINED	SPACE READY	SPACE ACCEPT	NUMBER OF DAYS SINCE SPACE [redacted]
37	PHY	PNSCFLWA-JAT-01-1	SR	13-Dec-99	25-Jan-00	08-Feb-00			01-May-00		[redacted]
38	PHY	DELDFLMA-FDW-01-1	SR	12-Jun-00	26-Jun-00	31-Jul-00	23-Aug-00	14-Sep-00	19-Oct-00		[redacted]
39	PHY	WWSPFLSH-JAT-01-1	SR	13-Dec-99	25-Jan-00	17-Feb-00	24-Mar-00	01-May-00	09-May-00		[redacted]

SOUTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

	TYPE	REFERENCE NUMBER	STATUS	APP BF DATE	QUOTE ISSUED TO CUSTOMER	FIRM ORDER BF DATE	PERMIT APPLIED	PERMIT OBTAINED	SPACE READY	SPACE ACCEPT
1	PHY	BCRTFLBT-ATX-01-1	SR	12/07/1999	01/19/2000	03/03/2000			06/06/2000	
2	PHY	BCRTFLBT-AVS-02-2	SR	08/07/2000	08/24/2000	09/18/2000			12/07/2000	
3	PHY	BCRTFLMA-NSC-01-2	SR	04/07/2000	05/05/2000	05/12/2000	06/07/2000	07/03/2000	07/25/2000	
4	PHY	DRBHFLMA-NAO-01-2	SR	03/03/2000	04/10/2000	04/19/2000	05/19/2000	06/02/2000	06/15/2000	
5	PHY	DRBHFLMA-TFQ-01-1	SR	01/07/2000	03/21/2000	05/11/2000			07/24/2000	
6	PHY	FTLDFLCY-ATX-01-1	SR	11/23/1999	01/13/2000	12/18/2000	03/29/2000	06/06/2000	01/31/2001	
7	PHY	FTLDFLCY-NSC-01-2	SR	04/07/2000	05/05/2000	05/05/2000	05/19/2000	05/26/2000	07/17/2000	
8	PHY	FTLDFLOA-TFQ-01-1	SR	01/07/2000	03/21/2000	05/11/2000	04/26/2000	05/09/2000	07/25/2000	
9	PHY	FTLDFLPL-ATX-01-1	SR	11/23/1999	01/13/2000	12/18/2000	03/22/2000	04/28/2000	02/07/2001	
10	PHY	FTLDFLPL-NSC-01-1	SR	11/29/1999	01/20/2000	02/25/2000	03/22/2000	04/28/2000	06/09/2000	
11	PHY	FTLDFLSU-SAU-02-1	SR	08/29/2000	09/12/2000	09/14/2000	10/11/2000	12/12/2000	12/15/2000	
12	PHY	HLWDFLHA-TFQ-01-1	SR	01/19/2000	03/21/2000	05/11/2000			07/17/2000	
13	PHY	HLWDFLMA-FDW-01-1	SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001	
14	PHY	HLWDFLMA-NSC-01-1	SR	11/29/1999	01/24/2000	02/25/2000	03/27/2000	06/08/2000	08/10/2000	
15	PHY	HLWDFLWH-ATX-01-1	SR	03/10/1999	05/03/1999	05/18/1999	09/23/1999	09/22/1999	03/16/2000	
16	PHY	HLWDFLWH-BSL-03A-1	SR	08/05/1999	09/29/1999	10/05/1999			01/06/2000	
17	PHY	HLWDFLWH-NSC-01-1	SR	11/29/1999	01/24/2000	02/25/2000	03/21/2000	04/10/2000	06/06/2000	
18	PHY	MIAMFLAE-NSC-01-2	SR	04/07/2000	05/03/2000	05/12/2000	05/17/2000	07/18/2000	08/22/2000	
19	PHY	MIAMFLAL-TFQ-01-2	SR	01/27/2000	03/21/2000	05/12/2000			08/10/2000	
20	PHY	MIAMFLFL-UTC-01-1	SR	07/20/2000	08/03/2000	09/25/2000	10/10/2000	11/07/2000	12/08/2000	
21	PHY	MIAMFLGR-NSC-01-2	SR	04/07/2000	05/04/2000	05/12/2000	02/14/2000	06/14/2000	09/12/2000	
22	PHY	MIAMFLGR-PAI-02-1	SR	08/17/2000	08/29/2000	08/30/2000			11/28/2000	
23	PHY	MIAMFLHL-NSC-01-2	SR	04/07/2000	05/04/2000	05/12/2000			09/28/2000	
24	PHY	MIAMFLNM-TFQ-01-2	SR	01/27/2000	03/21/2000	05/11/2000	06/01/2000	06/23/2000	08/10/2000	
25	PHY	MIAMFLPL-TFQ-01-3	SR	03/01/2000	04/17/2000	07/26/2000			10/26/2000	
26	PHY	MIAMFLSH-TFQ-01-2	SR	01/27/2000	03/21/2000	05/11/2000			08/08/2000	
27	PHY	MIAMFLSO-NPU-01-1	SR	11/08/1999	12/29/1999	02/04/2000	03/01/2000	04/21/2000	05/24/2000	
28	PHY	NDADFLAC-TFQ-01-2	SR	01/27/2000	03/21/2000	05/11/2000			08/08/2000	
29	PHY	NDADFLOL-FPL-01-3	SR	08/09/2000	08/24/2000	08/30/2000			11/13/2000	
30	PHY	PMBHFLTA-FDW-01-1	SR	10/27/1999	11/19/1999	03/22/2000			06/02/2000	
31	PHY	PRRNFLMA-NSC-01-2	SR	04/07/2000	05/04/2000	05/12/2000	06/01/2000	07/05/2000	08/10/2000	
32	PHY	WPBHFLGR-JAT-01-1	SR	11/16/1999	02/16/2000	03/01/2000			05/22/2000	
33	PHY	WPBHFLLE-NPU-01-1	SR	11/08/1999	01/05/2000	02/04/2000	03/10/2000	04/13/2000	09/06/2000	
34	PHY	WPBHFLRP-NAO-01-2	SR	03/03/2000	04/19/2000	04/28/2000	05/18/2000	06/13/2000	07/11/2000	

SOUTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

	TYPE	REFERENCE NUMBER	STATUS	APP BF DATE	QUOTE ISSUED TO CUSTOMER	FIRM ORDER BF DATE	PERMIT APPLIED	PERMIT OBTAINED	SPACE READY	SPACE ACCEPT	[illegible]
35	PHY-AUG	BYBHFLMA-AKJ-01A-1	SR	04/24/2000	05/17/2000	06/02/2000			06/08/2000		
36	PHY-AUG	BYBHFLMA-FDW-02B-1	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		
37	PHY-AUG	BYBHFLMA-NAA-01A-1	SR	05/19/2000	06/08/2000	07/21/2000			07/24/2000		
38	PHY-AUG	DLBHFLKP-FDW-02B-1	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		
39	PHY-AUG	DLBHFLMA-FDW-02B-1	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		
40	PHY-AUG	FTLDFLMR-NVE-01D-1	SR	04/04/2000	05/02/2000	05/23/2000			07/31/2000		
41	PHY-AUG	FTLDFLOA-AVS-04A-1	SR	06/27/2000	07/06/2000	08/15/2000			09/28/2000		
42	PHY-AUG	MIAMFLGR-LVC-01B-1	SR	09/28/1999	11/15/1999	01/10/2000			03/28/2000		
43	PHY-AUG	NDADFLBR-UTC-02A-1	SR	09/22/2000	10/06/2000	12/12/2000			01/25/2001		
44	PHY-AUG	WPBHFLAN-FDW-02B-1	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		
45	PHY-AUG	WPBHFLGA-FDW-02C-1	SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001		
46	PHY-AUG	WPBHFLHH-FDW-02C-1	SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001		
47	PHY-AUG	WPBHFLLE-FDW-02B-1	SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001		
48	PHY-AUG	WPBHFLRB-FDW-02B-1	SR	01/18/2001	02/01/2001	03/19/2001			04/30/2001		

EXHIBIT 7

Transaction Based Penalty Calculation Methodology

In a July 29, 2002 Florida Public Service Commission (FPSC) Memorandum, FPSC staff members ask for comments and suggestions related to incorporating the severity of a test failure into the remedy plan. While there are no limitations on the types of ideas that parties can provide, the staff members do request input for certain areas, which we summarize as follows:

- The extent of a failure (or disparity, severity):
  - Is there a way to determine the number of disparate transactions subject to penalty payments?
  - In what ways can disparity be measured?
    - e.g. ratios measures, difference measures
- Remedy payment calculations
  - Can a remedy plan incorporate the extent of the disparity?
  - Should payments be linear or non-linear functions of the disparity measure?
  - Should a measure's relative importance, used in computing a remedy payment, be adjusted by considering other factors, e.g. the number of transactions?

In eight states in BellSouth's region, remedy payments are paid on transactions that are determined to be out of compliance. The methodology for determining the number of disparate transactions relies on a linear function of a measure of disparity called the parity gap. The parity gap is the difference between the truncated z statistic and the balancing critical value. The remedy is paid on each out-of-compliance transaction, and the value of the per-transaction penalty amount depends on the type of submeasure that has failed. BellSouth's proposed SEEM plan and remedy calculation address the issues that the staff wants to consider. Since the Commission does express an interest in a transaction based remedy plan, BellSouth is proposing a plan founded on the same basic concepts, but based on a more sound methodology.

The basic concept that is central to BellSouth's approach is one that is used in Southwestern Bell's Texas plan. Under that plan the number of ALEC transactions that need to be "changed-for-the-better" in order for the ILEC to pass the parity test for a submetric is computed for the number of disparate transaction that should be remedied. For example, if the submetric is percent missed installations, the number ALEC "missed" transactions that should be "changed" to non-misses is determined. The basic computation involves equating the modified z statistic to the critical value, and solving for the number of the ALEC transactions, holding all other values fixed. [1] Finding this solution is a matter of simple algebra.

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[1] Strictly speaking, the total number of "misses" between the ILEC and ALEC is held fixed, and one finds the allocation of "misses" between ILEC and ALEC that makes the z-score equal to the critical value. The

In contrast, BellSouth's Florida SEEM plan uses a truncated z-statistic that aggregates the results of cell level modified z statistics. In comparing the plans in Texas and BellSouth's proposal for Florida, the truncated z methodology used in the BellSouth proposal seeks to reduce statistical bias that may exist in the simpler modified z of the Texas plan due to the lack of control over important confounding factors (such as wire center or type of service). The computation of the number of transactions that need to be "changed-for-the-better" (or number of disparate transactions) becomes more difficult, especially as the number of cells aggregated in the test increases. We will show below a theoretical solution to this problem that is a well-known operations research technique called a "Linear Program." Linear program (LP) software is available for solving these problems, but a computer may not be able to arrive at the solution to a "large" LP due to limitations on physical memory.

For the linear program that solves for the number of disparate transactions, the number of cells that have negative z-scores determines the size of the linear program. We have no control over how many cells this will be. As local telecommunication competition increases in the future the number of cells will grow, and this in turn means that an LP solution to the problem may not always be obtainable. Even with a very powerful computer that is loaded with memory, there will still be LPs with a large number of variables and a large number of constraints that the computer will not be able to finish solving. In essence, the LP solution is well defined but it is simply not viable in a production environment.

However, what we can do with the LP solution is determine the number of disparate transactions for some failed submetrics from past months, and look for relationships between some measures of disparity and the number of disparate transactions. After determining these relationships, we can then develop a surrogate for the LP solution that can be used in a production environment, but also produces the results close to that generated by an LP solution.

Below we discuss the LP method, and show how it works to determine the number of disparate transactions that need to change-for-the-better in order to have the truncated z statistic equal to the balancing critical value. We then look at the relationship between the LP solution and two measures of disparity: BellSouth's parity gap, and the ratio measure of severity described in "A Transactions Based Performance Plan for Florida."[2] Based on the observed relationships, we may be able to conceive of an approach that the staff members may wish to study.

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difference between the observed number of ALEC transactions and the number from this allocation is the number of "changed" ALEC transactions.

[2] *Deposition of Dr. George Ford.* Docket No. 000121-TP, Z-Tel Late Filed Exhibit 2, Part II, p. 2, eq. 3. This style of disparity measure is similar to "effect size" calculations performed in the Meta Analysis field of Statistics.

LP Method

Recall that the truncated z statistic has the following form:

$$Z^{t} = \frac{\sum_{j=1}^{L} W_j z_j - \sum_{j=1}^{L} W_j E_{j0}}{S_0},$$

where

- z_j = the cell j z-score which is truncated to 0 when the z-score is positive,
- W_j = the weight of cell j,
- E_{j0} = the expected value of z_j under the null hypothesis,
- $S_0 = \sqrt{\sum_{j=1}^{L} W_j Var(z_j)}$, the standard error of z_j under the null hypothesis, and
- L = the number of cells that will be aggregated for the truncated z statistic.

As described above, we would like to solve for the number of ALEC transactions that would make $Z^T = Val$, some agreed upon value. In the Texas style plan used in many states, Val is the critical value of the test because this represents the threshold for passing the test. It is analogous to finding the number of transactions that caused a performance measure to go beyond a benchmark. Other choices of VAL are possible, but the choice of the value should be based on a sound concept.

Regardless of the value for Val, we would like to determine values z_j^* such that

$$\sum_{j=1}^{L} W_j z_j^* = Val \cdot S_0 + \sum_{j=1}^{L} W_j E_{j0}. \qquad (1)$$

In doing this, we will assume that the weights, expected values under the null hypothesis and the standard error under the null hypothesis stay fixed. Once the z_j^* are determined that satisfy (1), we can solve for the number of ALEC transactions that need to be "changed" in order to achieve parity. But, there are a number of ways this can happen. For instance, if there are two cells that are combined for the truncated z, a big change in one of the cells could obtain the desired result, or small changes in each of the two cells could bring about the result. So we need a way to choose between solutions.

One way to choose the solution is to say that you want the solution that generates the largest number of "changed" transactions because this will generate the largest penalty. Thus, our objective is to maximize the number of "changed" ALEC transactions, under the constraint that the truncated z is equal to Val.

To make this more concrete, let us consider the rate measure, Customer Trouble Report Rate (CTRR). We will use the following notation:

- n_{1j} = the number of BellSouth troubles that occurred in cell j,
- n_{2j} = the number of ALEC troubles that occurred in cell j,
- $n_j = n_{1j} + n_{2j}$, the total number of troubles in cell j
- b_{1j} = the number of BellSouth lines in service in cell j,
- b_{2j} = the number of ALEC lines in service in cell j,
- $b_j = b_{1j} + b_{2j}$,
- $q_j = \frac{b_{1j}}{b_j}$.

Recall that the cell z-score and the cell weight for a rate measure are the following.

$$z_j = \min\left(\frac{n_{1j} - n_j q_j}{\sqrt{n_j q_j (1-q_j)}}, 0\right) = \min\left(\frac{n_j(1-q_j) - n_{2j}}{\sqrt{n_j q_j (1-q_j)}}, 0\right) \tag{2}$$

$$W_j = \sqrt{\frac{b_{1j} b_{2j}}{b_j} \cdot \frac{n_j}{b_j}} \tag{3}$$

Note the following:

1. If we determine z_j^*, the z-score value for cell j in equation (1), then we can solve for

   n_{2j}^* = the number of ALEC troubles that should have occurred in cell j in order to satisfy equation (1),

   in terms of z_j^*, n_j, and q_j.

2. The number of "changed" ALEC troubles in cell j is the difference between the actual number of troubles that did occur and the number that should have occurred, i.e.,

   $$n_{2j} - n_{2j}^*.$$

3. Improvement of a cell z-score amounts to changing the ALEC troubles to non-troubles so that the z-score increases (the value moves from left to right on the number line, i.e., negative values move towards zero, while positive values move away from 0). But since positive initial z-scores are truncated to zero when

forming the truncated z statistic, improvements in positive cells have no effect – the resulting cell z-score, z_j^*, stays at 0. This being the case, the only way to improve the aggregated truncated z statistic is to make improvements in cells where the original cell z-score is negative.

4. A cell weight depends on the total number of troubles in the cell, $n_j = n_{1j} + n_{2j}$. If we do not hold this total fixed as we solve for n_{2j}^* then we may get unexpected results. If n_{2j} decreases to n_{2j}^*, and we allow n_j to decrease as well, then the cell weight (equation (3) above) will decrease. This could result in the truncated z statistic getting worse (movement in the negative direction). Therefore, we hold n_j fixed. If n_{2j} decreases, then n_{1j} must increase. This can be interpreted as saying that given the total number of troubles observed in a cell, the allocation of those troubles in a parity situation should be n_{2j}^* for the ALEC, and $n_{1j}^* = n_j - n_{2j}^*$ for the ILEC.

Let's assume that the failed submeasure of interest has L^{Neg} cells for which z_j is negative, and these are label j = 1,...,L^{Neg}.[3] Then the total number of ALEC troubles that need to be "changed" for the better, referred to as the Total Affected Volume, is

$$TAV = \sum_{j=1}^{L^{Neg}} \left(n_{2j} - n_{2j}^* \right). \tag{4}$$

Now, suppose that we find values z_j^* in cells $j = 1,\ldots,L^{Neg}$ that satisfy equation (1), then we can used the form of equation (2) to solve for n_{2j}^* in these cells. That is,

$$n_{2j}^* = -\sqrt{n_j q_j (1-q_j)} \cdot z_j^* + n_j (1-q_j).$$

Combining this with equation (4), we can rewrite our objective as a linear function of z_j^*:

$$TAV(z_j^*) = h_1 z_1^* + h_2 z_2^* + \ldots + h_{L^{Neg}} z_{L^{Neg}}^* + H = \sum_{j=1}^{L^{Neg}} h_j z_j^* + H$$

where

$$H = \sum_{j=1}^{L^{Neg}} (n_j q_j - n_{1j}) \text{ and}$$

$$h_j = \sqrt{n_j q_j (1-q_j)} \text{ for } j = 1,\ldots,L^{Neg}$$

[3] For example, suppose the submeasure is disaggregated into 10 cells, and 7 cells have negative cell z-scores. So $L^{Neg} = 7$, and we will assume that the negative cells are j = 1, 2, 3, 4, 5, 6, and 7 while the cells with positive z-scores truncated to 0 are j = 8,9, and 10.

As we have indicated, we will seek to find the set of z_j^* that will maximize the value of $TAV(z_j^*)$, under constraint (1), which can be written as

$$\sum_{j=1}^{L^{Neg}} W_j z_j^* = Val \cdot S_o + \sum_{j=1}^{L} W_j E_{jo}$$

It is important to note that the sum of the weighted expected values on the right-hand-side of the equation is across all cells, while the sum on the left-hand-side is only over the negative cells. This occurs because the value of z_j in nonnegative cells is 0, but the cell expected values are not. We see then that this is a constraint that is linear in z_j^* over the negative cells.

There are several other constraints that are implicit in this problem. Namely,

$$\begin{aligned} &z_j^* \geq z_j \text{ for } j = 1,\ldots,L^{Neg}, \text{ and} \\ &z_j^* \leq 0 \text{ for } j = 1,\ldots,L^{Neg} \end{aligned} \tag{5}$$

These are also linear in z_j^* over the negative cells.

Thus, we have a linear objective function, $TAV(z_j^*)$ which we want to maximize subject to a set of linear constraints. This is known as a "linear program," and algorithms, such as the simplex method, exist for determining the solution.

If we consider a proportion measure instead we will obtain a similar LP. The way in which W_j, E_{jo}, and S_o are computed will differ (they are calculated according to the rules for proportion measures (see BellSouth's Florida SEEM plan documentation), and the coefficients of the objective function will be

$$H = \sum_{j=1}^{L^{Neg}} \left(\frac{n_{1j}}{n_j} a_j - a_{1j}\right) \text{ and}$$

$$h_j = \sqrt{\frac{n_{1j} n_{2j} a_j (n_j - a_j)}{n_j^2 (n_j - 1)}} \text{ for } j = 1,\ldots,L^{Neg}$$

where

- a_{1j} = the number of ILEC "missed" transactions in cell j
- a_{2j} = the number of ALEC "missed" transactions in cell j
- $a_j = a_{1j} + a_{2j}$, the total number of "missed" transactions in cell j
- n_{1j} = the number of ILEC "missed" transactions in cell j
- n_{2j} = the number of ALEC "missed" transactions in cell j
- $n_j = n_{1j} + n_{2j}$, the total number of "missed" transactions in cell j

It is harder to describe what needs to be done for mean measures. We can still require that we find values of z_j^* that satisfy the set of constraints defined by relationships (1) and (5). But the calculation of the number of values that need to be changed-for-the-better is difficult. The rate and proportion situations involved count variables, but mean variables involve measured variables. As an example, it is easy to conceive of changing a transaction such as the amount of time to complete an order to a better value – you simply make it smaller. However, not only do you need to consider which transactions to change, you also need to consider how much each change transaction should be improved. One concept for this comes from making an analogy with the proportion or rate measures. As was mentioned above, we don't just change the number of ALEC troubles or misses to non-troubles or non-misses, we actually hold the total number of ILEC and ALEC troubles (misses) fixed at the observed value for the cell. We then reallocate the troubles (misses) in a way that satisfies the constraints of the problem. Similarly, we can think of exchanging ILEC and ALEC values until we find a permutation of all the observed values that provides the cell z-score we are after. This is what is done in permutation testing, and it can be very computer intensive. If we needed to do this as well as solve an LP with a large number of constraints, we may not have enough computer time to solve this problem in a production environment. So we cannot easily write down the LP solution for a mean measure, nor solve it, but we can define it conceptually.

As the algorithms and computer capabilities improve, LPs will become easier to solve. However there are still many large LPs which are too complex for even the most powerful computers. It is evident, that an LP solution provides a nice theoretical way of determining the number of disparate transactions given a set of constraints like (1) and (5).[4] But such a solution may not be suitable for the production environment that is needed for administering a remedy plan like SEEM which must quickly and efficiently evaluate millions of retail and ALEC observations. Therefore, we need to look for production-friendly alternatives.

Surrogate Methods

Given that one would like to use an LP to solve for the number of disparate transactions, it is possible to look at the LP solutions for a number of performance measure tests from past months and see if a viable surrogate method can be determined that provides a solution that adequately captures the number of disparate transactions. This can be accomplished, as the commission staff suggests, by looking for ways to measure the disparity of a failed submeasure test.

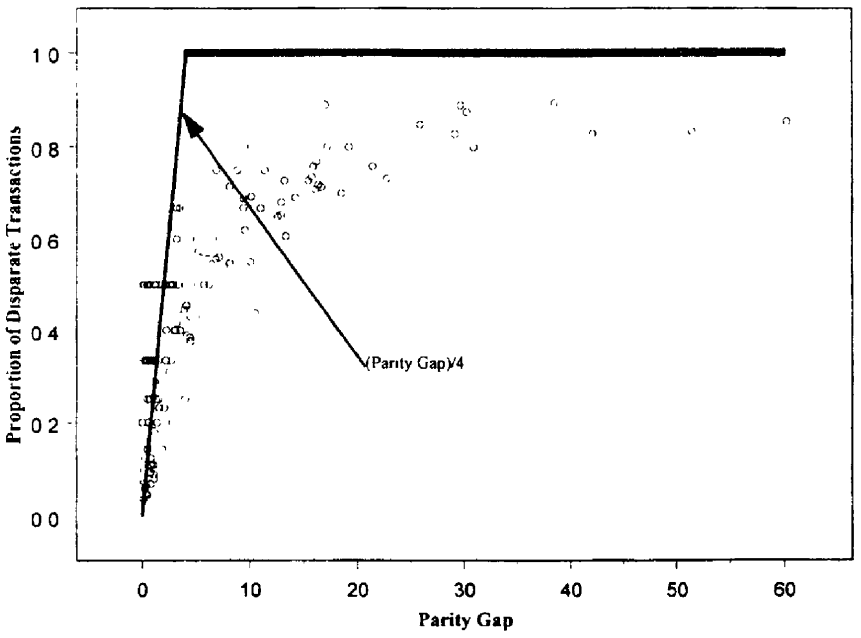
A very simple way of measuring disparity is taking the difference between the critical value and the truncated z statistic, as in the Texas plan. BellSouth calls this measure the

[4] It should be noted that the LP solution would treat the number of troubles (or missed installations) as a real (or floating-point) number, not an integer. If we want to insist that we arrive at an integer solution, we will need to take a little more care in how we define the problem, and used a "Mixed-Integer Program" (MIP) to find the solution. MIPs are far more computer intensive than LPs, and, for the most part, can only solve small to moderate sized problems.

"parity gap." It seems reasonable to assume that as the distance between the critical value and the test statistic gets larger, the severity of the failure is greater, and therefore the number of disparate transactions should increase. This relationship, however, must be relative to the total number of transactions that could be considered disparate. Therefore we would not define a relationship between the parity gap and the number of disparate transactions, but between the parity gap and the proportion of disparate transactions. When the parity gap is small, the proportion of disparate transactions should be small. When the parity gap is large the proportion of disparate transactions should be large. In more mathematical terms, the proportion of disparate transactions should be a monotonically increasing function of the parity gap.

BellSouth chose to use the simplest monotonically increasing function of the parity gap - a simple linear function. The basic calculation is to divide the parity gap by four when the parity gap is less than four to arrive at the proportion of disparate transactions (called the volume proportion). If the parity gap is four or larger, then the volume proportion is one (or 100 percent). To arrive at the final number of disparate transactions that should be remedied, you multiply the volume proportion by the base number of transactions that have the potential to be disparate. BellSouth uses the total number of impacted transactions in cells with negative z-scores because these are the only ones that can be "improved" and have the affect of shrinking the parity gap.

To test whether or not the parity gap captures enough transactions, the results of the method can be compared to the more rigorous LP method. The graphic below is a plot of the parity gap of a submetic test versus the proportion of disparate transactions found by the LP solution for 150 proportion and rates measures from Florida during the months of January, February and March of 2002. Superimposed on this plot is BellSouth's parity gap function. The plot indicates that BellSouth's parity gap function adequately captures the proportion of disparate transactions; requiring that BellSouth pay on a higher proportion of disparate transactions than the LP solution.

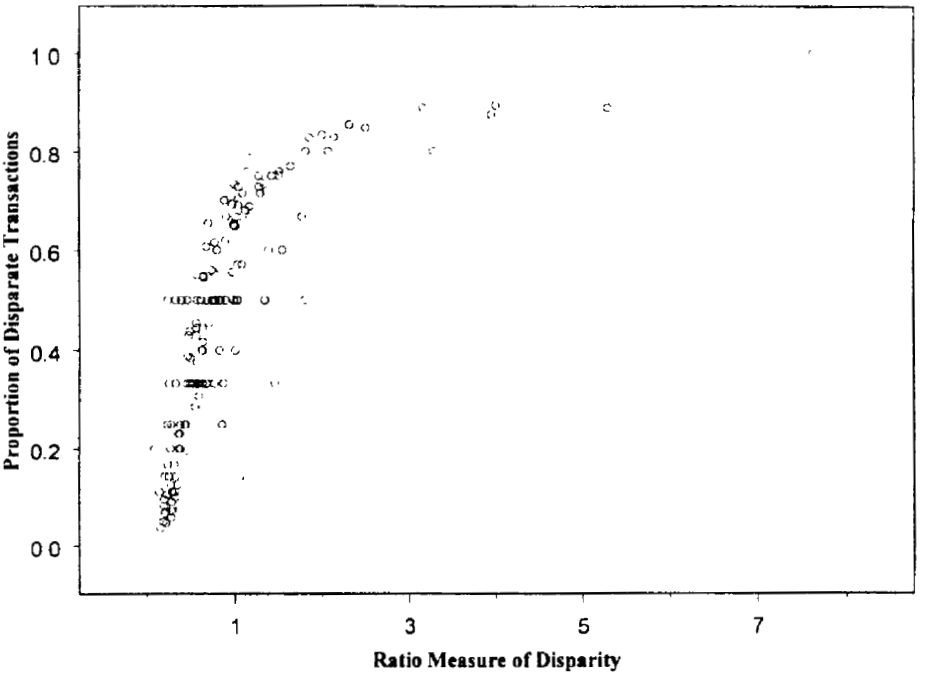


In Mr. Fudge's letter of July 29, 2002, Staff also suggests the consideration of other approaches to a disparity measure than the parity gap. The parity gap can be sensitive to the number of transactions that the truncated z statistic is based upon. This means that two submetric tests, based on different numbers of transactions, but with the same actual disparity, could have different parity gaps and therefore be judged differently in terms of disparity. If we want to avoid this, we should consider a disparity measure that is not affected by sample size. There are many ways to define such a measure like this, but a convenient one that is based on the truncated z calculation is:

$$\hat{d} = \frac{\delta}{2}\frac{Z^t}{c}.$$

Here, Z^t is the truncated z statistic for the submetric test, δ is result of evaluating the delta function that Dr. Ford of Z-Tel developed, and c is the critical value that is calculated using the balancing critical value equations with the delta function.

It is possible to look for a surrogate for the LP solution using this ratio measure instead of the parity gap. The graphic below is similar to the parity gap graphic above, but it plots the alternative ratio disparity measure versus the proportion of disparate transactions calculated by the LP solution.



This graphic exhibits some structure that could be used to define a function of the ratio measure that could be used to determine remedies in a similar way to the parity gap calculation that BellSouth is currently offering.

In conclusion, BellSouth believes that the LP methodology provides justification for the parity gap approach that it uses in many of its states for calculating the number of disparate transactions that are subject to remedy payments. While this is BellSouth's preferred approach to the problem, we are open to exploring other methods for performing the calculation provided that they are practical to implement in the production environment of the SEEM remedy calculation system, and provided that any alternative has its' basis in looking at the more mathematically sound LP solution. BellSouth does not feel that the LP methodology is a viable solution however, because it is not amenable to a production environment.

In Mr. Fudge's letter of July 29, 2002, Staff suggests a reevaluation of the" importance (weights) of submetrics or measures to determine the remedy amounts" and references Dr. Ford's Late filed Exhibit 2, Part II. BellSouth could not find a specific discussion of this topic in the Exhibit but BellSouth does agree the remedy amounts for each measurement should be based on the relative importance of a failure in that measurement. There are a number of measurements in BellSouth's SEEM plan and some of these are clearly more critical than others. The remedy amounts should reflect this relative importance.