State of Florida

Public Service Commission

CAPITAL CIRCLE OFFICE CENTER ● 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: NOVEMBER 20, 2002

TO: DIRECTOR, DIVISION OF THE COMMISSION CLERK & ADMINISTRATIVE SERVICES (BAYÓ)

FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (HARVEY, WINSON, HALLENSTEIN)
OFFICE OF GENERAL COUNSEL (DODSON)

RE: DOCKET NO. 000121A-TP - INVESTIGATION INTO THE ESTABLISHMENT OF OPERATIONS SUPPORT SYSTEMS PERMANENT PERFORMANCE MEASURES FOR INCUMBENT LOCAL EXCHANGE TELECOMMUNICATIONS COMPANIES. (BELLSOUTH TRACK)

AGENDA: DECEMBER 2, 2002 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\000121A.REC

ATTACHMENTS NAME AND LOCATION: S:\PSC\CMP\WP\ATTACH1.REC
S:\PSC\CMP\WP\ATTACH2.REC

CASE BACKGROUND

The Commission opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of operations support systems (OSS) provided for alternative local exchange carriers' (ALECs) use by incumbent local exchange carriers (ILECs). Associated with the performance metrics is a monitoring and enforcement program that is to ensure that ALECs receive nondiscriminatory access to the ILEC's OSS. Performance monitoring is necessary to ensure that ILECs are meeting their obligation to provide unbundled access, interconnection and resale to ALECs in a nondiscriminatory manner. Additionally, it establishes a standard

against which ALECs and this Commission can measure performance over time to detect and correct any degradation of service provided to ALECs.

Docket No. 000121-TP consists of three phases. Phase I began with workshops conducted by staff with members of the ALEC and ILEC communities. These workshops were held on March 30, 2000, August 8, 2000, and December 13, 2000. The purpose of Phase I was to determine and resolve any policy and legal issues in this matter. Phase II involved establishing permanent metrics for BellSouth Telecommunications, Inc. (BellSouth), including a specific monitoring and enforcement program. With the completion of Phase II, the Commission is beginning Phase III of this docket, which entails the establishment of performance metrics and a performance monitoring and evaluation program for the other Florida ILECs.

By Order No. PSC-01-1819-FOF-TP (Final Order), issued September 10, 2001, the Commission established permanent performance measures and benchmarks as well as a voluntary self-executing enforcement mechanism (Performance Assessment Plan) for BellSouth. By Order No. PSC-02-0187-FOF-TP, issued February 12, 2002, as amended by Order No. PSC-01-0187A-FOF-TP, issued March 13, 2002, BellSouth's Performance Assessment Plan was approved.

By Order No. PSC-02-0503-PCO-TP, issued April 11, 2002, Docket No. 000121-TP was divided into three subdockets: (1) 000121A-TP, in which filings directed toward the BellSouth track would be placed; (2) 000121B-TP, in which filings directed toward the Sprint track would be placed; and (3) 000121C-TP, in which filings directed toward the Verizon track would be placed.

By Order No. PSC-02-0989-PAA-TP, issued July 22, 2002, BellSouth was required to file a specific action plan designed to improve flow-through and adjust the Self Effectuating Enforcement Mechanism (SEEM) for the flow-through metric by July 30, 2002, for the August 2002 results. Additionally, BellSouth was ordered to establish defect correction metrics to be effective August 1, 2002, as part of the Service Quality Measures in Docket 000121A-TP.

By Order No. PSC-02-1094-PAA-TP, issued August 9, 2002, BellSouth was required to implement three new Service Quality

Measures to address concerns over the timely and effective implementation of ALEC-initiated change requests for new features. Additionally, BellSouth was ordered to change the required due date for Tier 1 and Tier 2 SEEM payments.

This recommendation addresses proposed changes to BellSouth's Performance Assessment Plan in conjunction with the Commission's six-month review process set forth in Order No. PSC-02-0187-FOF-TP in Docket 000121A-TP. The six-month review process consisted of a collaborative work group, which included BellSouth, interested ALECs, and the Commission. The group reviewed the Performance Assessment Plan for additions, deletions and other modifications.

JURISDICTION

The Commission is vested with jurisdiction over this matter pursuant to Sections 364.01(3) and (4)(g), Florida Statutes. Pursuant to Section 364.01 (3), Florida Statutes, the Florida legislature has found that regulatory oversight is necessary for the development of fair and effective competition in the telecommunications industry. To that end, Section 364.01 (4) (g), Florida Statutes, provides, in part, that the Commission shall exercise its exclusive jurisdiction in order to ensure that all providers of telecommunications service are treated fairly by preventing anticompetitive behavior. Furthermore, it is noted that the FCC has encouraged the states to implement performance metrics and oversight for purposes of evaluating the status of competition under the Telecommunications Act of 1996.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission order BellSouth to implement the revisions to the Performance Assessment Plan that were agreed upon by the parties in the six-month review process?

RECOMMENDATION: Yes. Staff recommends that BellSouth be ordered to implement the proposed changes to the Performance Assessment Plan as reflected in Attachments 1 and 2. **(HALLENSTEIN)**

STAFF ANALYSIS: By Order No. PSC-01-1819-FOF-TP, issued September 10, 2001, in Docket 000121A-TP, the Commission adopted BellSouth's Performance Assessment Plan for purposes of monitoring nondiscrimination in Operation Support Systems provided to ALECs. The Performance Assessment Plan is comprised of a Service Quality Measurement Plan and a Self-Effectuating Enforcement Mechanism (SEEM) Administrative Plan.

The Service Quality Measurement Plan describes in detail the measurements produced by BellSouth in order to evaluate the quality of service delivered to both wholesale and retail BellSouth customers. The major measurement categories are: preordering, ordering, provisioning, maintenance and repair, and billing. In addition, the following categories are also included: operator services and directory assistance, database information, E911, trunk group performance, collocation, and change management.

BellSouth's SEEM Plan as approved in Order No. PSC-01-1819-FOF-TP describes in detail the means by which enforcement will be determined. This includes the appropriate level of performance measurement disaggregation for compliance reporting and the statistical methodology to be used to compare retail to wholesale performance for determination of penalties and payments.

As part of Order No. PSC-01-1819-FOF-TP, the parties stipulated that, within the first two years of implementation, BellSouth will participate in six-month review cycles to discuss any proposed changes to the Performance Assessment Plan. On September 25-26, 2002 and October 17-18, 2002, staff conducted the first six-month review workshops to gauge the effectiveness of

BellSouth's permanent performance measures and to determine whether the current remedy structure is effective in driving BellSouth's performance toward the required standards. The proposed changes to the remedy structure of the SEEM plan will be addressed by staff in a future recommendation.

In response to the parties' workshop comments concerning the proposed changes to the permanent performance measures, staff developed two separate tables: 1) One that lists proposed changes to the performance measures that were agreed upon by the parties, and 2) One that lists proposed changes to the performance measures that were not agreed upon by the parties. Staff requested that the parties file respective comments in regards to both tables.

This recommendation addresses the proposed changes to BellSouth's Performance Assessment Plan that were agreed to by the parties participating in the six-month review workshop. The parties' comments on the proposed changes to the performance measures that were not agreed upon are due on December 12, 2002, and will be addressed in a separate recommendation to be brought before the Commission at a later date.

Attachment 1 is the table listing the proposed changes to the performance measures that were agreed upon by the parties. The table is divided into four columns which identify:

- The party proposing the change,

- The performance measurement being changed,

- The proposed change to the performance measurement, and

- The parties' confirmation of the proposed change.

It should be noted, that the measures highlighted in Attachment 1 represent the parties proposed changes that were agreed upon in the workshop to be deleted from this six-month review cycle.

As a part of the Operation Support System test, BearingPoint Consulting (formerly KPMG Consulting) was required to conduct an independent assessment of the adequacy of BellSouth's permanent performance measures. This assessment, known as the Adequacy Study, filed in Docket 000121A-TP in September 2002, details documentation ambiguities (red-line changes) in the performance measures as well as recommended changes to the structure of the Service Quality Measures. As part of this docket, staff requested that the parties file comments in regards to the Adequacy Study. Attachment 2 reflects documentation or red-line changes to the performance measures noted in the Adequacy Study that were agreed upon by the parties.

Staff recommends that BellSouth be ordered to adopt the proposed changes listed in both Attachment 1 and 2.

ALEC Comments

In the ALEC Coalition's comments concerning staff's proposed table of agreed upon issues, the ALEC Coalition acknowledged that the table accurately states the issues upon which the parties agreed. However, in its comments, the ALEC Coalition clarified that for item numbers 55 through 66 listed in Attachment 1, their agreement to the addition of the word "customer" in the proposed changes would not result in the exclusion of "no trouble found" or "found OK/test OK" situations.

BellSouth Comments

In BellSouth's comments concerning staff's proposed table of agreed issues, BellSouth concurred with staff's assessment of all the issues proposed in the table with the exception of a proposed change that staff inadvertently listed as in agreement by the parties. The change was a modification to an exclusion to the Firm Order Confirmation Timeliness Measure (0-9). The ALECs proposed changing the word "LCSC" to "center(s)". BellSouth currently disagrees with this change. Staff acknowledges that it erred in including this change in the proposed table of agreed issues. The proposed change has been removed from Attachment 1 and will be addressed with other proposed changes to the performance measures that were not agreed upon in a future staff recommendation.

CONCLUSION: Staff recommends that BellSouth implement the proposed changes to the Performance Assessment Plan as reflected in Attachments 1 and 2.

TABLE OF AGREED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of October 22, 2002

Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
1	BST	Pg 3, 8/30 Filing	OSS-1	ADD: Exclusion - Scheduled OSS Maintenance	Yes
2	BST	Pg 3, 8/30 Filing	OSS-1	ADD: Exclusion - Retail Usage of LENS	Yes
3	BST	Pg 5, 8/30 Filing	OSS-2	ADD: Exclusion - Add language addressing trouble caused by outside BST control	Yes
4	BST	Pg 5, 8/30 Filing	OSS-2	ADD: Exclusion - Degraded service outage and scheduled maintenance	Yes
5	BST	Pg 5, 8/30 Filing	OSS-2	ADD: Business Rule - Add the words "loss of functionality" to the measure.	Yes
6	BST	Pg 5, 8/30 Filing	OSS-2	ADD: Disaggregation - Add "per OSS interface" to the Regional level of Disaggregation.	Yes
7	BST	Pg 5, 8/30 Filing	O-1	ADD: Exclusion - Scheduled OSS Maintenance	Yes
8	BST	Pg 6, 8/30 Filing	O-1	ADD: Calculation - Add the words "for returned acknowledgements" to the sum of all response interval in numerator.	Yes
9	BST	Pg 6, 8/30 Filing	O-1	Calculation - Change denominator to include acknowledgement notices returned in reporting period.	Yes
10	BST	Pg 6, 8/30 Filing	O-2	MODIFY: Benchmark - From 100% to 99.5% for TAG	Yes
11	BST	Pg 6, 8/30 Filing	O-3	ADD: Exclusion - Scheduled OSS Maintenance	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
12	BST	Pg 7, 8/30 Filing	LSR Flow-Through Matrix	DELETE: Remove LSR Flow-Through Matrix from the SQM **Agreement reached at workshop not to delete, but to include an "as of date"**	Yes
13	BST	Pg 7, 8/30 Filing	LSR Flow-Through Matrix	ADD: SQM directions for locating the latest version of the Flow-Through Matrix on PMAP	Yes
14	BST	Pg 9, 8/30 Filing	P-2	SPLIT MEASUREMENT: <u>P-2A</u> - Jeopardy Notice Interval <u>P-2B</u> - % of Orders Given Jeopardy Notices	Yes
15	BST	Pg 9, 8/30 Filing	P-2	ADD: <u>Exclusion to P-2A</u> - Orders issued with a due date of 48 hours of less.	Yes
16	BST	Pg 12, 8/30 Filing	P-12	DELETE: Eliminate measurement P-12 (LNP-Avg Disconnect Timeliness Intvl & Disconnect Timeliness Intvl Dist)	Yes
17	BST	Pg 12, 8/30 Filing	P-13B P-13C	ADD: P-13B (LNP-Avg Time Out of Svce for LNP Conversions) and P-13C (LNP-% of Time BST Applies the 10-digit Trigger Prior to the LNP Order Due Date) **Agreement reached at workshop if P-13D is added. BST filed P-13D in errata.**	Yes
18	BST	Pg 15, 8/30 Filing	B-4, B-5, B-6	MODIFY <u>BENCHMARK</u>: BST proposes benchmarks be adopted for these three billing measures, rather than retail analogs	Yes
19	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	ADD: <u>Exclusion</u> - 1)trunk groups blocked due to ALEC network/equipment failure	Yes
20	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	<u>ADD:</u> <u>Exclusion</u> - 4)final groups actually overflowing, not blocked	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
21	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	MODIFY BUSINESS RULES: Categories 1, 10 & 16 are all "BST affecting" and should be added to the "BST affecting categories"	Yes
22	BST	Pg 17, 8/30 Filing	C-2	MODIFY BUSINESS RULE: Define the end time as the time when BST notifies the ALEC, not when the ALEC accepts the arrangement.	Yes
23	BST	SEEM Admin. Plan Sec. 2.2	N/A	ADD LANGUAGE UNDERLINED: BellSouth will make performance reports available to each ALEC on a monthly basis. The reports will contain information collected in each performance category and will be available to each ALEC via the Performance Measurements Reports website.	Yes
24	BST	SEEM Admin. Plan Sec. 2.3	N/A	ADD LANGUAGE UNDERLINED: Final validated SQM reports will be posted no later than the last day of the month following the data month in which the activity is incurred, or the first business day thereafter.	Yes
25	BST	SEEM Admin Plan Sec. 2.5	N/A	ADD LANGUAGE UNDERLINED: Such penalty shall be made to the Commission for deposit into the state General Revenue Fund within fifteen (15) calendar days of the end of the reporting month in which the late publication of the report occurs.	Yes
26	BST	SEEM Admin Plan	N/A	INSERT NEW SECTION 2.7 TO STATE: Tier II SEEMS payments and Administrative fines and penalties for late, incomplete, and reposted reports will be sent via Federal Express to the Commission. Checks and the accompanying transmittal letter will be postmarked on or before the 15th of the month.	Yes

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27	BST	SEEM Admin Plan	N/A	INSERT NEW SECTION 2.9 TO STATE: BellSouth will provide documentation of late and incomplete occurences during the reporting month that the data is posted to the website. These notations may be viewed on the Performance Measurements website from the PMAP home page on the Current Month Site Updates link	Yes
				SQM Changes-Exhibit 3	
28	BST	Exhibit 3	Intro-duction	In the 4th paragraph of the Introduction section of the SQMP, change "This document is intended for use by someone with knowledge of <u>the</u> telecommunication industry,..."	Yes
29	BST	Exhibit 3	Intro-duction	In the 5th paragraph of the Introduction section of the SQMP, 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~~ <u>Documentation Downloads</u> folder.	Yes
30	BST	Exhibit 3	OSS-1	In the Business Rules, change the phrase: "...when the appropriate response is returned to the client application" to "when the appropriate response is <u>received</u> by the client application."	Yes
31	BST	Exhibit 3	OSS-1	In the Business Rules, add the following sentence: <u>BST will not schedule maintenance during the hours from 8:00 am until 9:00 pm, Monday through Friday.</u>	Yes
32	BST	Exhibit 3	OSS-1	In the Calculation, add the following formula: <u>% within interval=(e/f) X 100</u> e=Sum of Response Time for Interval f=# of Legacy Requests During the Reporting Period for System **"for which a response was provided"**	Yes
33	BST	Exhibit 3	OSS-1	Delete the OASISCAR,OASISLPC, and OASISMTN from the Legacy System Access Times table.	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
34	BST	Exhibit 3	OSS-2	Change the title and calculation of this measure from "Interface Availability..." to "OSS Availability..."	Yes
35	BST	Exhibit 3	OSS-3	Change the title and calculation of this measure from "Interface Availability..." to "OSS Availability..."	Yes
36	BST	Exhibit 3	OSS-3	Calculation change: OSS Availability (a/b) x 100 a=Functional Availability <u>of front end systems</u> b= Scheduled Availability <u>of front end systems</u> **Agreement reached at workshop to delete reference to "front end systems"**	Yes
37	BST	Exhibit 3	OSS-3	Change the SQM disagg and the SEEM disagg from "Regional Level" to "Regional Level, <u>per OSS interface</u>."	Yes
38	BST	Exhibit 3	OSS-3	Move the OSS Interface Availability and the SEEM OSS Interface Availability to Appendix C and change the OSS Interface "LNP" to "LNP Gateway".	Yes
39	BST	Exhibit 3	OSS-4	Change the SQM disagg and the SEEM disagg from "Regional Level" to "Regional Level, Per OSS Interface."	Yes
40	BST	Exhibit 3	PO-2	Business Rules-Delete references to "RoboTAG".	Yes
41	BST	Exhibit 3	PO-2	Changes to Data Retained: Relation to CLEC Experience • Report Month • ~~Legacy Contract~~ • ~~Response Interval~~ • ~~Regional Scope~~ • <u>Total Number of Inquiries</u> • <u>SI Interval</u> • <u>State and Region</u>	Yes
42	BST	Exhibit 3	O-9	Definition change: Interval for Return of a FOC Interval is the average response time from receipt of a valid LSR <u>or ASR</u> to distribution of a FOC. The interval will include an electronic facilities check.	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
43	BST	Exhibit 3	P-1	Changes to Exclusions: ~~Orders with apptmt code of "A" for Rural orders.~~ Orders with an Apptmt 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.	Yes
44	BST	Exhibit 3	P-3	Change to Exclusions: Order Activities of BST 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.	Yes
45	BST	Exhibit 3	P-3	Change to Report Structure: Dispatch/Non-Dispatch (except Trunks)	Yes
46	BST	Exhibit 3	P-3A	Change to Report Structure: Dispatch/Non-Dispatch (except Trunks)	Yes
47	BST	Exhibit 3	P-4	Change to Report Structure: ~~Residence & Business reported in day intervals= 0,1,2,3,4,5,5+~~ ~~ISDN Orders included in Non-Design~~	Yes
48	BST	Exhibit 3	P-4	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes
49	BST	Exhibit 3	P-4A	Change to Business Rules: 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~~	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
50	BST	Exhibit 3	P-4A	Change to Report Structure: • ~~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	Yes
51	BST	Exhibit 3	P-4A	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes
52	BST	Exhibit 3	P-5	Business Rule Change: ~~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. **Agreement reached at workshop to delete strikeout of first sentence and include the language.**	Yes
53	BST	Exhibit 3	P-5	Report Structure Change: 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 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.)~~	Yes
54	BST	Exhibit 3	P-5	Change to SQM Disagg-Analog/Benchmark section: The Retail Analog to UNE Digital Loop>=DS1 incorrectly shows the analog as Retail Digital Loop <=DS1 and needs to be corrected to >=DS1.	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
55	BST	Exhibit 3	P-7A	Business Rule Change: 1. BST performs the hot cut, notifies the CLEC by telephone. 2. BST performs the hot cut and attempts to notify the CLEC by telephone, but receives no answer and leaves a phone message.	Yes
56	BST	Exhibit 3	P-7B	Calculation Change: Average Recovery Time=(c/d) • c-Sum of all the Recovery Times • d=# of Troubles per circuit Referred to BST	Yes
57	BST	Exhibit 3	P-8	Change the Title of this measure by replacing the word "Tested" with the phrase "Passing Cooperative Testing".	Yes
58	BST	Exhibit 3	P-8	Definition Change: A loop will be considered successfully cooperatively tested when both the CLEC and ILEC BST representatives agree that the loop has passed the cooperative testing meets the technical specifications set forth in TR 73600.	Yes
59	BST	Exhibit 3	P-9	Business Rule Change: 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.	Yes
60	BST	Exhibit 3	M&R-1	Definition Change: The percent of customer trouble reports not cleared by the committed date and time.	Yes
61	BST	Exhibit 3	M&R-1	Calculation Change: % of Missed Repair Appts=(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	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
62	BST	Exhibit 3	M&R-2	Definition Change: Initial and repeated customer direct or referred customer troubles reported within a calendar month per 100 lines/circuits in service.	Yes
63	BST	Exhibit 3	M&R-2	Calculation Change: 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	Yes
64	BST	Exhibit 3	M&R-3	Calculation Change: Maintenance Duration=(a-b) a=Date and Time of Service Restoration b=Date and Time Customer Trouble Ticket was Opened Avg Maintenance Duration=(c/d) c=Total of all maint durations in the reporting period d=Total Closed Customer Troubles in the reporting period	Yes
65	BST	Exhibit 3	M&R-4	Definition Change: 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.	Yes
66	BST	Exhibit 3	M&R-4	Calculation Change: % Repeat Customer Troubles within 30 Days-(a/b)x100 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.	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
67	BST	Exhibit 3	M&R-4	Data Retained Change: Relating to CLEC Experience: • Total and % Repeat Customer Trouble Reports within 30 Days (TOT_REPEAT) Relating to BST Performance • Total and % Repeat Customer Trouble Reports within 30 Days	Yes
68	BST	Exhibit 3	M&R-5	Definition Change: For Out of Service Customer Troubles (no dial tone, cannot be called or cannot call out (the percentage of Total OSS Customer Troubles cleared in excess of 24 hours (All design services are considered to be out of service).	Yes
69	BST	Exhibit 3	M&R-5	Business Rule Change: 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.	Yes
70	BST	Exhibit 3	M&R-5	Calculation Change: 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	Yes
71	BST	Exhibit 3	M&R-6	Definition Change: This report measures the average time a customer is in queue when calling a BST Repair Center.	Yes
72	BST	Exhibit 3	B-1	Calculation Change: Invoice Accuracy=[(a-b)/a x 100) a=Absolute Value of Total Billing Revenues during current month b=Absolute Value of Total Billing Related Adjustments during current month.	Yes
73	BST	Exhibit 3	B-1	Report Structure Change: • Number of Adjustments	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
74	BST	Exhibit 3	B-1	Data Retained Change: Change the phrase "Billing Related Adjustments" to "Total Billing Related Adjustments" for both CLEC Experience and BST Performance.	Yes
75	BST	Exhibit 3	B-2	Definition Change	Yes
76	BST	Exhibit 3	B-2	Business Rule Change	Yes
77	BST	Exhibit 3	B-2	SQM Analog/Benchmark Change: ~~CRIS based invoices will be released for delivery within 6 business days,~~ ~~CRIS based invoices will be released for delivery within 8 calendar days,~~ CLEC Avg Delivery Intervals for both CRIS and CABS Invoices are comparable to BST Avg delivery for both systems.	Yes
78	BST	Exhibit 3	B-4	Report Structure Change: Remove "BellSouth Aggregate".	Yes
79	BST	Exhibit 3	B-4	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes
80	BST	Exhibit 3	B-5	Report Structure Change: Remove "BellSouth Aggregate".	Yes
81	BST	Exhibit 3	B-5	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes
82	BST	Exhibit 3	B-6	Report Structure Change: Remove "BellSouth Aggregate".	Yes
83	BST	Exhibit 3	B-6	Data Retained Change: Replace "Report Month" and "Record Type" with "None"	Yes

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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
84	BST	Exhibit 3	B-7	Business Rule Change: Add 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 the absolute value of total fractional recurring charges on the bill. **Agreement reached at workshop to delete the word "correct" from the denominator.**	Yes
85	BST	Exhibit 3	B-8	Business Rule Change: Add sentence: The count of non-recurring charges in the calculation refers to a sum of absolute total dollar values wether billed on the correct bill or the absolute value of total non-recurring charges on the bill.	Yes
86	BST	Exhibit 3	B-10	Title, Calculation, and Data Retained Change: Inserting "Business" before "Days".	Yes
87	BST	Exhibit 3	C-1	Definition Change: Measures the avg time (counted in calendar days) from the receipt of a complete and accurate collocation application (including receipt of app fee if required) to the date BST 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, BST must respond ~~as to whether space is available or not~~ with space availability and a price quote.	Yes
88	BST	Exhibit 3	C-2	SQM Analog/Benchmark Change: Virtual-Augment-~~45~~ 60 Calendar Days (Without Space Increase).	Yes
89	BST	Exhibit 3	CM-3	Definition Change: Measures whether CLECs received requirements or business rule documentation on time to prepare for BST interface/system changes so CLEC interfaces are not impaired by change ~~as set forth in the Change Control Process governed by the CLEC/BST Review Board.~~	Yes

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90	BST	Exhibit 3	CM-3	Business Rule Change: 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/cp_live/index.html. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.	Yes
91	BST	Exhibit 3	CM-9	Calculation Change: 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.~~	Yes
92	BST	Exhibit 3	Report Pub Dates	In the last sentence of this section, change: "BST shall retail 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 3 years.	Delete
93	BST	Exhibit 3	P-1	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
94	BST	Exhibit 3	P-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
95	BST	Exhibit 3	P-3	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete

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96	BST	Exhibit 3	P-3A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
97	BST	Exhibit 3	P-4	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
98	BST	Exhibit 3	P-4A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
99	BST	Exhibit 3	P-5	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
100	BST	Exhibit 3	P-7	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
101	BST	Exhibit 3	P-7A	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
102	BST	Exhibit 3	P-7B	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete

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103	BST	Exhibit 3	P-7C	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
104	BST	Exhibit 3	P-8	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
105	BST	Exhibit 3	P-9	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
106	BST	Exhibit 3	P-10	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
107	BST	Exhibit 3	M&R-1	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
108	BST	Exhibit 3	M&R-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
109	BST	Exhibit 3	M&R-3	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete

Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
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110	BST	Exhibit 3	M&R-4	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
111	BST	Exhibit 3	M&R-5	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete
112	BST	Exhibit 3	DUI-2	Change in Data Retained/Relating to CLEC experience: Note: Code in parentheses is the corresponding header found in the ~~raw data~~ Supporting Data Files (SDF).	Delete

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113	ALEC	Pg 8, 8/30 Filing	PO-1	ADD to Tier 1	Yes
114	ALEC	Pg 8, 8/30 Filing	PO-2	ADD to Tier 1	Yes
115	ALEC	Pg 8, 8/30 Filing	ADM	Independent SEEM audit is necessary. ALECs want audit of BST's PARIS reports to ensure the remedy pmts are accurate.	Yes
116	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis • Tier I Metric	Yes
117	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis • Calc Remedy Amt on Web Site	Yes
118	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis • Adjustment	Yes
119	ALEC	Pg 10, 8/30 Filing	PARIS	ADD: Report w/info for each submeasure on a monthly basis • Restated Remedy Calculation	Yes
120	ALEC	Pg 16, 8/30 Filing	NEW SQM	ADD: SQM - % of Time BST Applies the 10 Digit Trigger Prior to the LNP Order Due Date; % Out of Service<60 Minutes; and LNP Avg Disconnects Timeliness Intvl & Disconnect Timeliness Intvl Dist (Non-Trigger) **Agreement reached at workshop if P-13D is added. BST filed P-13D in errata.**	Yes

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Original #	Proposer	Ref	Metric	Proposal	Parties Agree
121	ALEC	PG 6, ALEC Modified Redline	OSS-2	Add: SEEM disagg-"BST will include all interfaces used by ALECs alone in the SEEM plan."	Yes
122	ALEC	PG 8, ALEC Modified Redline	OSS-3	Add: SEEM disagg-"BST will include all interfaces used by ALECs alone in the SEEM plan."	Yes
123	ALEC	PG 10, ALEC Modified Redline	OSS-4	MODIFY: Disagg to include Appendix D. **Agreement reached at workshop that BST will add "footnote of key".**	Yes
124	ALEC	PG 15, ALEC Modified Redline	O-1	MODIFY: Calculation of "c" and "d".	Yes
125	ALEC	PG 35, ALEC Modified Redline	O-9	MODIFY: Change exclusion "LCSC" to "center(s)".	Yes
126	ALEC	PG 46, ALEC Modified Redline	P-1	MODIFY: Calculation-replace"for the reporting period" with "from the earliest BST missed appt".	Yes
127	ALEC	PG 64, ALEC Modified Redline	P-5 (P-4 in ALEC Comments)	MODIFY: Business Rules-Replace "transmitted" with "delivered".	Yes
128	ALEC	PG 64, ALEC Modified Redline	P-5 (P-4 in ALEC Comments)	ADD: Business Rules-For the retail analogue, 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.	Yes

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129	ALEC	PG 77, ALEC Modified Redline	P-8	MODIFY: Definition-replace "has passed the cooperative testing" replace with "meets the technical specifications set forth in TR73600".	Yes
130	ALEC	PG 107, ALEC Modified Redline	M&R-7	MODIFY: Definition-Replace "key customer accounts" with "customer impacting".	Yes
131	ALEC	PG 113, ALEC Modified Redline	B-3	ADD: SEEM - Add to Tier I.	Yes
132	ALEC	PG 127, ALEC Modified Redline	B-10	ADD: Calculation - Add "responses due"	Yes
133	ALEC	PG 133, ALEC Modified Redline	DUI-1	ADD: Business Rules - Add "This metric includes updates from stand-alone directory listing orders"	Yes
134	ALEC	PG 135, ALEC Modified Redline	DUI-2	ADD: Business Rules - Add "This metric includes updates from stand-alone directory listing orders"	Yes

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Original #	Proposer	Ref	Metric	Proposal	Parties Agree
135	ALEC	Pg 2, 8/30 Filing		ADD to SEEM: Severity component	Delete (from this forum only)
136	ALEC	PG 40, ALEC Modified Redline	O-10	ALECs willing to defer SEEM measure until next review.	Delete
137	ALEC	PG 52, ALEC Modified Redline	NEW SQM P-3	ADD: SQM for Percent Missed Initial Installation Appointments	Delete
138	ALEC	PG 58, ALEC Modified Redline	NEW SQM P-4	ADD: SQM for Average Completion Interval (OCI) & Order Completion Interval Distribution	Delete
139	ALEC	PG 68, ALEC Modified Redline	P-6	SEEM: ALECs willing to defer until next review.	Delete
140	ALEC	PG 74, ALEC Modified Redline	P-7B	SEEM: ALECs willing to defer until next review.	Delete
141	ALEC	PG 89, ALEC Modified Redline	P-12	ADD: Business Rules-"The disconnect activity will be performed before the order is completed in SOCs"	Delete
142	ALEC	PG 90, ALEC Modified Redline	P-12	MODIFY; SQM Disagg-Needs to be discussed in context of new LNP measures.	Delete

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Original #	Proposer	Ref	Metric	Proposal	Parties Agree
143	ALEC	PG 106, ALEC Modified Redline	M&R-6	SEEM: ALECs willing to defer until next review.	Delete
144	ALEC	PG 116, ALEC Modified Redline	B-4	SEEM: ALECs willing to defer until next review.	Delete
145	ALEC	PG 120, ALEC Modified Redline	B-6	SEEM: ALECs willing to defer until next review.	Delete
146	ALEC	PG 121, ALEC Modified Redline	B-7	SEEM: ALECs willing to defer until next review.	Delete
147	ALEC	PG 124, ALEC Modified Redline	B-8	SEEM: ALECs willing to defer until next review.	Delete
148	ALEC	PG 126, ALEC Modified Redline	B-9	MODIFY: SQM Disagg - Replace "Region" with "State"	Delete
149	ALEC	PG 126, ALEC Modified Redline	B-9	MODIFY: SQM Disagg - Replace "Diagnostic" with "95% within interval"	Delete
150	ALEC	PG 126, ALEC Modified Redline	B-9	ADD: SEEM - Add to Tier I and Tier II.	Delete

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Original #	Proposer	Ref	Metric	Proposal	Parties Agree
151	ALEC	PG 134, ALEC Modified Redline	DUI-1	SEEM: ALECs willing to defer until next review.	Delete
152	ALEC	PG 136, ALEC Modified Redline	DUI-2	SEEM: ALECs willing to defer until next review.	Delete
153	ALEC	PG 138, ALEC Modified Redline	DUI-3	SEEM: ALECs willing to defer until next review.	Delete
154	ALEC	PG 149, ALEC Modified Redline	C-1	SEEM: ALECs willing to defer until next review.	Delete
155	ALEC	PG 151, ALEC Modified Redline	C-2	SEEM: ALECs willing to defer until next review.	Delete
156	ALEC	PG 158, ALEC Modified Redline	CM-5	SEEM: ALECs willing to defer until next review.	Delete

RED-LINE CHANGES FROM THE BEARINGPOINT ADEQUACY REVIEW	
Metric Name	**Documentation Improvements (Red-line changes)**
OSS-1: Average Response Time and Response Interval (Pre-Ordering/ Ordering)	The Definition, Business Rules, and Calculation documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 120, BellSouth submitted a red-line SQM to modify the documented SQM text to provide additional clarity regarding the SQM name, as well as the definition, business rules, and calculation sections. These changes are not present in the Permanent Metrics.
OSS-2: Interface Availability (Pre-Ordering/Ordering)	**Definition** The hours of operation website should be updated to show hours of availability for all appropriate levels of disaggregation. BellSouth references in both the Interim and Permanent Metrics a matrix on its website (http://www.interconnection.bellsouth.com/oss/oss_hour.html). This matrix does not list hours of availability for all levels of disaggregation.
OSS-3: Interface Availability (Maintenance & Repair)	**Definition** The hours of operation website should be updated to show hours of availability for all appropriate levels of disaggregation. BellSouth references in both the Interim and Permanent Metrics a matrix on its website (http://www.interconnection.bellsouth.com/oss/oss_hour.html). This matrix does not list hours of availability for all levels of disaggregation. **Business Rules** The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Exception 59, BellSouth submitted a red-line SQM to modify the documented SQM text to provide additional clarity regarding the Business Rules documentation. These changes are not present in the Permanent Metrics.
OSS-4: Response Interval (Maintenance & Repair)	**Performance Standard** The Performance Standard documentation of this SQM should be modified to reflect a benchmark of "Parity with Retail." The benchmark in the Interim Metrics is listed as "Parity with Retail," while the benchmark in the Permanent Metrics is listed as "Average Interval." KPMG Consulting has confirmed that "Parity with Retail" is the correct performance standard for this SQM.
PO-1: Loop Makeup – Response Time – Manual	**Business Rules** The Business Rules section reference to "mail" should be replaced with "e-mail." BellSouth states the following: "The CLEC Manual Loop Makeup Service Inquiry (LMUSI) process includes inquiries submitted via mail or FAX to BellSouth's Complex Resale Support Group (CRSG)." KPMG Consulting has confirmed that the CRSG does not receive inquiries via mail and believes that this statement refers to electronic mail.
PO-2: Loop Makeup – Response Time – Electronic	**Exclusions** The Exclusions documentation should be modified to remove the "designated holidays" exclusion. KPMG Consulting believes the exclusion of "designated holidays" is inappropriate for an SQM that measures an automated process.

Metric Name	Documentation Improvements (Red-line changes)
O-1: Acknowledgement Message Timeliness	The Definition and Calculation documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 112, BellSouth submitted a red-line SQM to add distribution intervals to the documented SQM. These distribution intervals are not present in the Permanent Metrics for this SQM. **Exclusions** The Exclusions documentation should be modified to note the exclusion of "Manually Submitted LSRs." KPMG Consulting notes that no exclusions are listed in the Permanent Metrics. Since the O-1 SQM includes only transactions electronically submitted via EDI or TAG, manually submitted LSRs would not be included in the calculation of this SQM.
O-3: Percent Flow-Through Service Requests (Summary)	**Business Rules** The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of its response to FL Exception 121, BellSouth modified category three and added a 14th category in the documented SQM. Both additions clarified differences in the flow-through handling of Local Number Portability (LNP) orders. These changes are not present in the Permanent Metrics. **Calculation** The Calculation documentation should be modified to provide additional clarity on the calculation references to clarifications and errors. The Calculation documentation states the following: Percent Flow Through $= a \div [b - (c + d + e + f)] \times 100$ ● a = The total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued ● b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO ● c = the number of LSRs that fall out for manual processing ● d = the number of LSRs that are returned to the CLEC for clarification ● e = the number of LSRs that contain errors made by CLECs ● f = the number of LSRs that receive a Z status. Since clarifications and errors are synonymous, "d" and "e" could be interpreted to double count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "d" refers to auto clarifications only, and "e" refers to clarifications returned from the Local Carrier Service Center (LCSC) to the CLEC. The Calculation documentation also states the following: Percent Achieved Flow Through $= a \div [b-(c+d+e)] \times 100$ ● a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued. ● b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO ● c = the number of LSRs that are returned to the CLEC for clarification ● d = the number of LSRs that contain errors made by CLECs ● e = the number of LSRs that receive Z status Since clarifications and errors are synonymous, "c" and "d" could be interpreted to double-count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "c" refers to auto clarifications only, and "d" refers to clarifications returned from the LCSC to the CLEC.

Metric Name	Documentation Improvements (Red-line changes)
O-4: Percent Flow-Through Service Requests (Detail)	**Business Rules** The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of its response to FL Exception 121, BellSouth modified category three and added a 14th category to the documented SQM. Both additions clarified differences in the flow-through handling of Local Number Portability (LNP) orders. These changes are not present in the Permanent Metrics. **Calculation** The Calculation documentation should be modified to provide additional clarity on the calculation references to clarifications and errors. The Calculation section states the following: Percent Flow Through $= a \div [b - (c + d + e + f)]$ X 100 ● a = The total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued ● b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO ● c = the number of LSRs that fall out for manual processing ● d = the number of LSRs that are returned to the CLEC for clarification ● e = the number of LSRs that contain errors made by CLECs ● f = the number of LSRs that receive a Z status. Since clarifications and errors are synonymous, "d" and "e" could be interpreted to double count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "d" refers to auto clarifications only, and "e" refers to clarifications returned from the LCSC to the CLEC. The Calculation section also states the following: Percent Achieved Flow Through $= a \div [b-(c+d+e)]$ X 100 ● a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued. ● b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO ● c = the number of LSRs that are returned to the CLEC for clarification ● d = the number of LSRs that contain errors made by CLECs ● e = the number of LSRs that receive Z status Since clarifications and errors are synonymous, "c" and "d" could be interpreted to double-count the number of clarifications and errors. By double-counting clarifications and errors, the reported flow through percentage increases since the denominator is reduced. KPMG Consulting has confirmed that "c" refers to auto clarifications only, and "d" refers to clarifications returned from the LCSC to the CLEC.
O-5: Flow-Through Error Analysis	**Name of SQM** The name of the SQM should be modified to remove "O-5" from the SQM header. KPMG Consulting notes that this measurement has no calculation other than a count; it presents data that is used to assist in the calculation of O-3 and O-4. The removal of "O-5" from the SQM header would make it clear that this measurement has no calculation component.

Metric Name	Documentation Improvements (Red-line changes)
O-8: Reject Interval	**Exclusions** The Exclusions documentation's holiday exclusion should be labeled as referencing partially mechanized and non-mechanized transactions only. BellSouth lists the following exclusion: "Designated Holidays are excluded from the interval calculation." KPMG Consulting has confirmed that the holiday exclusion is appropriate for partially mechanized and non-mechanized transactions, but that this exclusion is not appropriate for fully mechanized transactions. The Exclusions documentation's reference to hours of exclusion should be updated. KPMG Consulting notes that the hours of operation and hours of exclusion for various centers can change over time. The hours of exclusion listed in the Permanent Metrics may not accurately reflect actual hours of exclusion. To address this issue, KPMG Consulting suggests that a reference be added to the Exclusions section to indicate the websites where current hours of operation can be found.
O-9: Firm Order Confirmation Timeliness	**Exclusions** The Exclusions documentation's holiday exclusion should be labeled as referencing partially mechanized and non-mechanized transactions only. BellSouth lists the following exclusion: "Designated Holidays are excluded from the interval calculation." KPMG Consulting has confirmed that the holiday exclusion is appropriate for partially mechanized and non-mechanized transactions, but that this exclusion is not appropriate for fully mechanized transactions. The Exclusion documentation's reference to hours of exclusion should be updated. KPMG Consulting notes that the hours of operation and hours of exclusion for various centers can change over time and therefore, the hours of exclusion listed in the Permanent Metrics may not accurately reflect actual hours of exclusion. To address this issue, KPMG Consulting suggests that a reference be added to the Exclusions section to indicate the websites where current hours of operation can be found. **Report Structure** The Report Structure documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 129, BellSouth submitted a red-line SQM to address documented time bucket discrepancies. These changes are not present in the Permanent Metrics.

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Metric Name	Documentation Improvements (Red-line changes)
O-10: Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual	**Exclusions** The Exclusions documentation's reference to hours of exclusion should be updated. KPMG Consulting notes that the hours of operation and hours of exclusion for various centers can change over time and therefore, the hours of exclusion listed in the Permanent Metrics may not accurately reflect actual hours of exclusion. To address this issue, KPMG Consulting suggests that a reference be added to the Exclusions section to indicate the website where current hours of operation can be found. **Calculation** The Calculation documentation should be updated so the FOC Timeliness Interval calculation label and the Average Interval numerator ("c") are renamed. The calculation label and numerator should reflect the measurement of the O-10 SQM, rather than the O-9 SQM. The first calculation shown in this section is listed as follows: FOC Timeliness Interval = (a - b) • a = Date and Time Firm Order Confirmation (FOC) for SI with LSR returned to CLEC • b = Date and Time SI with LSR received KPMG Consulting believes that the calculation heading: "FOC Timeliness Interval" could be misleading since the O-9 SQM measures the FOC Timeliness interval. The second calculation shown in this section is listed as follows: Average Interval = (c ÷ d) • c = Sum of all FOC Timeliness Intervals • d = Total number of SIs with LSRs received in the reporting period The numerator "c" could also be misleading since it also refers to the FOC Timeliness intervals.
O-11: Firm Order Confirmation and Reject Response Completeness	**Exclusions** The Exclusions documentation should be updated to reflect a "Fatal Rejects" exclusion. BellSouth states the following in the Business Rules documentation: "Mechanized - The number of FOCs or Auto Clarifications sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs." BellSouth defines a Mechanized reject in the Business Rules section of the O-7: Percent Rejected Service Requests text as "either a Fatal Reject or an Auto Clarification." While Auto Clarifications are one type of Reject, Fatal Rejects are not mentioned in the O-11 SQM documentation. BellSouth also does not list Fatal Rejects in the Exclusions section of the O-11 SQM. KPMG Consulting believes that Fatal Rejects should be excluded from this SQM since BellSouth defines a Fatal Reject in the O-7: Percent Rejected Service Requests text as follows: "A Fatal Reject occurs when a CLEC attempts to electronically submit an LSR but required fields are either not populated or incorrectly populated and the request is returned to the CLEC before it is considered a valid LSR." The O-11 SQM Definition documentation states the following: "A response is expected from BellSouth for every Local Service Request transaction (version)." Since a Fatal Reject is not considered a valid LSR, the exclusion of Fatal Rejects from O-11 would be consistent with the Definition documentation of this SQM as stated above. KPMG Consulting has also confirmed that Fatal Rejects are excluded from this SQM.
O-12: Speed of Answer in Ordering Center	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.

Metric Name	Documentation Improvements (Red-line changes)
P-1: Mean Held Order Interval & Distribution Interval	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	The Calculation, Levels of Disaggregation, and Performance Standard documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 150, BellSouth submitted a red-line SQM to modify the SQM text to provide additional documentation clarity regarding the calculation, levels of disaggregation, and performance standard sections. These changes are not present in the Permanent Metrics. **Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

P-3A: Percent Missed Installation Appointments Including Subsequent Appointments	**Definition**
	The Definition documentation should be updated to account for the inclusion of subsequent appointments.
	
	Calculation
	The Calculation documentation should be modified.
	    Percent Missed Installation Appointments = $(a \div b) \times 100$
	    • a = Number of Appointments in Reporting Period past the Original (Date/Time as applicable) Committed and Subsequent Committed Due Date
	    • b = Number of Appointments on Orders Completed in Reporting Period
	
	KPMG Consulting believes that "a" could be interpreted that the appointment be counted only if it were past the original committed due date and the subsequent committed due date, which would only count subsequent misses. However, since the P-3 SQM, which measures the percentage of missed initial installation appointments, has not been ordered by the FPSC, the P-3A SQM must include both types of misses: initial and subsequent.
	
	    "a" should be redefined as "a = (Number of Appointments in Reporting Period past the Original Committed Due Date) + (Number of Appointments in Reporting Period past the Subsequent Committed Due Date)."
	
	Report Structure
	The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)

P-4A: Average Order Completion and Completion Notice Interval (AOCCNI) Distribution	**Definition**
	The Definition documentation should be modified to include completion notices. The Definition section includes the following statement: "The "Order Completion And Completion Notice Interval" provides the percentages of orders completed within certain time periods." The phrase "orders completed" could imply that only the order completion interval is being measured by this SQM. Since this SQM measures both the completion interval and the completion notice interval, the statement is not accurate. "Orders completed" should be updated to include completion notices.
	
	Business Rules
	The Business Rules documentation should be updated. The Business Rules section includes the following statement: "The accumulated time for each reporting dimension is then divided by the associated total number of orders completed." The phrase "orders completed" could imply that only the order completion interval is being measured by this SQM. Since this SQM measures both the completion interval and the completion notice interval, the statement is not accurate. "Orders completed" should be updated to include completion notices. The Business Rules section also includes the following statement: "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)."Since this SQM measures both the completion interval and the completion notice interval, the text could be misleading and should be removed.
	
	Calculation
	The Calculation documentation should be updated.
	    Completion Interval = (a - b)
	    ● a = Date and Time Completion Notice is sent
	    ● b = FOC/SOCS date time-stamp (application date)
	
	The name of the calculation, "Completion Interval," could imply that only the order completion interval is being calculated. The interval (a – b) measures both the order completion interval and the completion notice interval. The phrase "Completion Interval" could be misleading and should be updated to include completion notices.
	
	Average Completion Interval = (c ÷ d)
	● c = Sum of all Completion Intervals
	● d = Count of Orders Completed in Reporting Period

Metric Name	Documentation Improvements (Red-line changes)
P-4A: Average Order Completion and Completion Notice Interval (AOCCNI) Distribution (Continued)	The name of the calculation, "Average Completion Interval," could imply that only the average of all completion intervals is being calculated. Both the "c" and "d" variables refer only to completions, not to completions and completion notices and should be updated in the documentation. 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 For the reasons stated above, the name of the calculation, "Order Completion Interval Distribution (for each interval)," could also be misinterpreted. Both the "e" and "f" variables refer only to completed service orders, not to completed service orders and completion notices and should be updated in the documentation. **Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis. **Performance Standard** The Performance Standard documentation should be modified. KPMG Consulting notes that the retail analog for UNE Digital Loop [3] DS1 is listed as Retail Digital Loop £ DS1. KPMG Consulting has confirmed that the retail analog is, in fact, Retail Digital Loop [3] DS1.
P-5: Average Completion Notice Interval	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis. **Performance Standard** The Performance Standard documentation should be modified. KPMG Consulting notes that the retail analog for UNE Digital Loop [3] DS1 is listed as Retail Digital Loop £ DS1. KPMG Consulting has confirmed that the retail analog is, in fact, Retail Digital Loop [3] DS1.
P-6: % Completions/Attempts without Notice or < 24 hours Notice	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-7: Coordinated Customer Conversions Interval	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
P-7A: Coordinated Customer Conversions - Hot Cut Timeliness % Within Interval and Average Interval	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-7B: Coordinated Customer Conversions – Average Recovery Time	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-7C: Hot Cut Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-8: Cooperative Acceptance Testing - % of xDSL Loops Successfully Tested	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-9: % Provisioning Troubles within 30 days of Service Order Completion	**Calculation** The Calculation documentation should be updated. % Provisioning Troubles within 30 days of Service Order Activity = (a ÷ b) X 100 ● a = Trouble reports on all completed orders 30 days following service order(s) completion ● b = All Service Orders completed in the previous report calendar month The definition for "a" could be interpreted to include trouble reports for only the 30-day point following service order(s) completion, not trouble reports within 30 days. "a" should be redefined as "a = Trouble reports on all completed orders within 30 days following service order(s) completion." **Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
P-10: Total Service Order Cycle Time (TSOCT)	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
P-11: Service Order Accuracy	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.

P-12: LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	**Calculation**
	
	The Calculation documentation should be modified.
	
	Disconnect Timeliness Interval Distribution (for each interval) = (e ÷ f) X 100
	
	    • e = Disconnected numbers completed in "X" days
	
	    • f = Total disconnect numbers completed in reporting period
	
	    "e" should be changed from days to minutes since, as noted below, the time buckets are in minutes.
	
	Report Structure
	
	The Report Structure documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Exception 15, BellSouth submitted a red-line SQM to address the lack of time buckets (<=15 minutes, >15 minutes) in the SQM documentation. The time buckets are not present in the Permanent Metrics SQM.

M&R-1: Missed Repair Appointments	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-2: Customer Trouble Report Rate	**Report Structure** The Report Structure documentation should be updated to include Dispatch/Non-Dispatch. KPMG Consulting believes that this designation is important and notes that BellSouth's published report for this SQM is reported by Dispatch/Non-Dispatch. The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-3: Maintenance Average Duration	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-4: Percent Repeat Troubles within 30 Days	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
M&R-5: Out of Service (OOS) > 24 Hours	**Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.
M&R-6: Average Answer Time – Repair Centers	**Exclusions** The Exclusions documentation should be updated to list abandoned calls as an exclusion. KPMG Consulting notes that abandoned calls are not listed as an exclusion. Since the SQM is based on the total number of calls answered in the reporting period, abandoned calls cannot be included. **Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
M&R-7: Mean Time To Notify CLEC of Network Outages	The Definition, Business Rules, and Calculation documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 133, BellSouth submitted a red-line SQM to modify the SQM text to provide additional clarity regarding the definition, business rules, and calculation documentation. These changes are not present in the Permanent Metrics. **Definition** The Definition section should be modified. BellSouth refers to "Key Customer Accounts" in this section, which implies that only key customers are notified.Since all CLECs have the opportunity to subscribe to the notification list, KPMG Consulting believes that the phrase "Key Customer Accounts" should be removed to avoid confusion. **Report Structure** The Report Structure documentation should be updated to reflect geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis. **Performance Standard** The Performance Standard documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 161, BellSouth issued a red-line SQM regarding the documentation change of the performance standard from Parity by Design to Parity with Retail. The change is not present in the Permanent Metrics.

Metric Name	Documentation Improvements (Red-line changes)

B-2: Mean Time to Deliver Invoices	**Definition**
	
	The Definition documentation should be modified, as the Business Rules documentation appears to provide a better definition of the SQM, while the Definition documentation appears to contain background information on the SQM. The Definition documentation states the following: "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." The Business Rules documentation states the following: "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." KPMG Consulting believes that the Business Rules documentation as stated above is a more appropriate definition of the SQM. KPMG Consulting also believes that the reference to "records" in the Definition documentation should be changed to "invoices" to remain consistent with the intent of the SQM.
	
	Business Rules
	
	The Business Rules documentation should be modified, as the Definition documentation appears to contain background information on the SQM, while the Business Rules documentation appears to provide a better definition of the SQM. The Business Rules documentation should be modified to state "timeliness of billing records sent to CLECs." The Calculation documentation states the following:
	
	    Invoice Timeliness = (a - b)
	    ● a = Invoice Transmission Date
	    ● b = Close Date of Scheduled Bill Cycle
	
	The end point for the Invoice Timeliness calculation is the transmission date to the CLEC. The Business Rules state: "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." The Business Rules section should be modified to state "timeliness of billing records sent to CLECs," rather than "delivered to CLECs" since BellSouth cannot be held responsible for the billing records after they have been sent.

B-8: Non-Recurring Charge Completeness	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state-specific basis.
D-1: Average Database Update Interval	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
D-2: Percent Database Update Accuracy	The Definition and Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 180, BellSouth submitted a red-line SQM to clarify the documented SQM text. The text in the Permanent Metrics for this SQM does not match the text in the red-line SQM. **Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional and state-specific basis. **Levels of Disaggregation** The Levels of Disaggregation documentation should be updated to include Directory Assistance. There are two levels of disaggregation listed for this SQM: LIDB Directory Listings KPMG Consulting notes that BellSouth's published report for this SQM includes a third level of disaggregation: Directory Assistance. BellSouth also refers to Directory Assistance in both the Definition and Business Rules sections.
D-3: Percent NXXs and LRNS Loaded by the LERG Effective Date	**Definition** The Definition documentation should be modified. KPMG Consulting notes that the first paragraph of the Definition documentation appears to contain the actual SQM definition. The second and third paragraphs appear to contain more background information that would be more appropriately presented in the Business Rules section. **Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
TGP-2: Trunk Group Performance-CLEC Specific	**Definition** The Definition documentation should be updated to reflect that the SQM is measured on a CLEC specific basis. KPMG Consulting notes that the wording of the definition is exactly the same as the TGP-1 wording definition. While TGP-2 is reported on a CLEC specific basis, TGP-1 is reported on an aggregate basis.
C-1: Collocation Average Response Time	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state-specific basis.

Metric Name	Documentation Improvements (Red-line changes)
C-2: Collocation Average Arrangement Time	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state-specific basis.
C-3: Collocation Percent of Due Dates Missed	**Business Rules** The Business Rules documentation should be modified. The Business Rules documentation includes the following statement: "The clock starts on the date that BellSouth receives a complete and accurate Bona Fide firm order accompanied by the appropriate fee if required." KPMG Consulting notes that this statement also appears in the Business Rules section of the C-2: Collocation Average Arrangement Time SQM. Since the C-3 SQM measures the percentage of due dates missed, no time intervals are required for the percentage calculation. **Calculation** The Calculation documentation should be modified. The Calculation section includes the following statement: • a = Number of Completed Orders that were not completed within BellSouth Committed Due Date during Reporting Period KPMG Consulting notes that "within" should be replaced with "by" since orders cannot be completed within a due date, but can be completed by a due date. **Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a state-specific basis.
CM-1: Timeliness of Change Management Notices	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
CM-2: Change Management Notice Average Delay Days	**Business Rules** The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 69, BellSouth submitted a red-line SQM to clarify the documented Business Rules regarding the intent of the SQM. These changes are not present in the Permanent Metrics. **Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.

Metric Name	Documentation Improvements (Red-line changes)
CM-3: Timeliness of Documents Associated with Change	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
CM-4: Change Management Documentation Average Delay Days	**Business Rules** The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Observation 69, BellSouth submitted a red-line SQM to clarify the documented Business Rules regarding the intent of the SQM. These changes are not present in the Permanent Metrics.
CM-4: Change Management Documentation Average Delay Days (Continued)	**Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.
CM-5: Notification of CLEC Interface Outages	**Business Rules** The Business Rules documentation should be updated to reflect the red-line SQM changes associated with the Florida Third Party OSS Test. As part of FL Exception 81, BellSouth submitted a red-line SQM to clarify the documented Business Rules regarding the intent of the SQM. These changes are not present in the Permanent Metrics. **Report Structure** The Report Structure documentation should be updated to reflect the geographic scope. KPMG Consulting notes that no geographic scope designation (region or state) is present in the Permanent Metrics SQM. This designation is important to determine at what level the SQM report results are presented. KPMG Consulting notes that BellSouth's current SQM report is reported on a regional basis.