Matilda Sanders

From:	Sapper,Lisa A - LGCRP [lisariley@att.com]
Sent:	Friday, August 27, 2004 2:31 PM
To:	Sapper,Lisa A - LGCRP; Filings@psc.state.fl.us; Jerry Hallenstein
Cc:	Lisa Harvey; Patty Christensen; rmulvany@birch.com; gwatkins@covad.com; mfeil@mail.fdn.com; Michael Gross; dst@tobinreyes.com; aleiro@idstelcom.com; NEdwards@itcdeltacom.com; Donna McNulty; jmclau@kmctelecom.com; jacanis@kelleydrye.com; mhazzard@kelleydrye.com; jmcglothlin@mac-law.com; Vicki Gordon Kaufman; rheatter@mpowercom.com; danyelle.kennedy@networktelephone.net; lnowalsky@nbglaw.com; Michael Britt; Peter Dunbar; Susan Masterton; Dulaney L. O'Roark; Mark.Ozanick@accesscomm.com; mconquest@itcdeltacom.com; MCampbell@nuvox.com; TSauder@birch.com; Nancy Sims; Nancy White; Tracy Hatch; Chris McDonald; Musselwhite,Brian J - LGCRP; Ross-Bain,Martha M - LGCRP
Subject:	RE: 000121A -- CLEC Coalition Comments on BellSouth SQM

000121A
Rsp re SQM l

>   Docket No. 000121A-TP -- In re: Investigation into the Establishment
> of Operations Support system Permanent Performance Measures for
> Incumbent Local Exchange Telecommunications Companies (**BellSouth**
> track)
>
>
>   Attached please find for electronic filing the CLEC Coalition's Comments into the
matrix concerning proposed modifications to BellSouth's Performance Assessment Plan in the
above-referenced docket. The cover letter, certificate of service and the CLEC
Coalition's Comments are a total of 49 pages. The attached document should be considered
the official version for purposes of the docket file.
>
>   As indicated in the cover letter, copies of the CLEC Coalition's Comments are being
distributed to parties via electronic (in cases where e-mail addresses are available) and
U.S. Mail. Thank you for your assistance in this matter.

         <<000121A CLECs Rsp re SQM Issues Matrix__8.27.04_ v6.pdf>>

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August 18, 2004

BY ELECTRONIC FILING
Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

     Re: Docket No. 000121A-TP

Dear Ms. Bayó:

    Pursuant to Staff's memorandum dated August 16, 2004, attached please find the CLEC Coalition's Comments into the matrix addressing proposed modifications to BellSouth's Performance Assessment Plan in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

    Thank you for your assistance with this filing.

                    Sincerely yours,

                    s/ Tracy W. Hatch

                    Tracy W. Hatch

TWH/las
Attachment
cc: Parties of Record

BellSouth and CLEC-Proposed Florida SQM Modifications

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	SQM Introduction/Report Publication Date/Report Delivery Methods		
Introduction (BST Matrix, p. 1-2)	1) Revise to update documentation references. 2) Revise to more accurately define the nature of the SQM and include references to the FCC and Courts of Law. 3) Add a section to address implementation schedule after a Commission order.		1) **CLECs AGREE.** CLECs do not oppose referring to wholesale services only (although this should not relieve BST from reporting retail performance to determine parity. CLECs do not object to referring to all FL-specific orders that created the SQM and SEEM plans and revisions. 2) **CLECs DISAGREE.** The deletions are unnecessary and in fact, not helpful, in that they eliminate useful background information regarding the nature of the SQM. The proposed additions, in addition to the deletions, do not "more accurately define the nature of the SQM", because the SQM does reflect previous FPSC Orders and is not based on a future FPSC order. Furthermore, references to the FCC and Courts of Law are not necessary, because any changes would derive from FPSC orders, as stated in the existing language. 3) **CLECs DISAGREE.** The proposed language of the second sentence, pertaining to change of law provisions, is inaccurate and unnecessary, in that it suggests that BellSouth may cease reporting data or paying remedies if BellSouth is no longer required "to provide any UNE or UNE combination pursuant to Section 251 of the Act". This Commission's jurisdiction over the SEEM plan is based on Florida statutes designed to ensure "the development of fair and effective competition" ((F.S.A. §364.01(3)) and to preclude anticompetitive behavior (F.S.A. §364.01(4)(g)). Order No. PSC-01-1819-FOF-TP, FPSC Docket No. 000121-TP, issued September 10, 2001, at p. 8. In addition to discouraging anti-

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			competitive behavior and encouraging fair and effective competition, in BellSouth's own words, "the purpose of the enforcement provisions of the [SEEM] plan is to prevent 'backsliding' after BellSouth obtains authority to provide interLATA service." BellSouth Telecommunications, Inc. Brief of the Evidence, FPSC Docket 000121-TP, filed May 31, 2001, p. 1. The FCC Order granting 271 authority in Georgia and Louisiana expressly states that the performance plan is intended to ensure that a BOC meets its 271 obligations: "In prior Orders, the [Federal Communications] Commission has explained that one factor it may consider as part of its public interest analysis is whether a BOC would have adequate incentive to continue to satisfy the *requirements of Section 271* after entering the long distance market. Although it is not a requirement for Section 271 Authority that a BOC be subject to such performance assurance mechanisms, the Commission previously has found that the existence of the satisfactory performance monitoring and enforcement mechanisms is probative evidence that the BOC will continue to meet its *271 obligations* after grant of such authority." *In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc. And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana,* CC Docket No. 02-35, Memorandum Opinion and Order, 17 FCC Rcd 9018, 9181082, ¶ 291 (2002) (emphasis added). Because the SEEM Plan is intended to enforce BellSouth's 271 obligations following the grant of 271 authority, continuing obligations under 271 should be included in the Plan until the FCC forbears from enforcing the specific obligation under 47 U.S.C. § 160.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Report Publication Dates (BST Matrix p. 2)	1) Clarify existing process 2) Remove SEEM requirements 3) Reference SEEM Admin Plan		1) **CLECs AGREE.** CLECs do not oppose adding next business day language. 2) **CLECs DISAGREE.** CLECs want to ensure that language on when reports are late and when remedies are paid is retained. This should not be subject to change unless CLECs agree and Commission orders consensus. Therefore, any change to location of this information should not be in document where BST's unilateral changes may be missed in compliance filings. CLECs agree that language should not conflict with administrative plan. 3) **CLECs AGREE.** So long as all raw data used for metrics, including excluded data, are contained on Supporting Data Files and SDUM is complete information to interpret the files.
Report Delivery Methods (BST Matrix p. 2)	Updated and word clarification.		**CLECs AGREE.** CLECs do not oppose changes.
SQM – ALL Measures			
SQM Disagg. (BST Matrix p. 1)	**Delete line sharing in SQM/SEEM disgg.**		**CLECs DISAGREE.** Line sharing is a checklist item 4 loop transmission facility, which BellSouth is obligated to provide pursuant to 47 U.S.C. § 271 *et seq.* The Commission's jurisdiction over the SEEM Plan is based on Florida statutes designed to ensure "the development of fair and effective competition" ((F.S.A. §364.01(3)) and to preclude anticompetitive behavior (F.S.A. §364.01(4)(g)). Order No. PSC-01-1819-FOF-TP, FPSC Docket No. 000121-TP, issued September 10, 2001, at p. 8. In addition to discouraging anti-competitive behavior and encouraging fair and effective competition, in BellSouth's own words, "the purpose of the enforcement provisions of the [SEEM] plan is to prevent 'backsliding' after BellSouth obtains authority to provide interLATA service." BellSouth Telecommunications, Inc. Brief of the Evidence,

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			FPSC Docket 000121-TP, filed May 31, 2001, p. 1.
			The FCC Order granting 271 authority in Georgia and Louisiana expressly states that the performance plan is intended to ensure that a BOC meets its <u>271</u> obligations:
			In prior Orders, the [Federal Communications] Commission has explained that one factor it may consider as part of its public interest analysis is whether <u>a BOC would have adequate incentive to continue to satisfy the *requirements of Section 271* after entering the long distance market</u>. Although it is not a requirement for Section 271 Authority that a BOC be subject to such performance assurance mechanisms, the Commission previously has found that the existence of the satisfactory performance monitoring <u>and enforcement mechanisms</u> is probative evidence that <u>the BOC will continue to meet its *271 obligations*</u> after grant of such authority.
			In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc. And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 02-35, Memorandum Opinion and Order, 17 FCC Rcd 9018, 9181082, ¶ 291 (2002) (emphasis added).
			Because the SEEM Plan is intended to enforce BellSouth's <u>271 obligations</u> following grant of 271 authority, continuing obligations under 271 (like line sharing) should be included in the Plan until the FCC forbears from enforcing the specific obligation under 47 U.S.C. § 160.
Data Retained (BST Matrix p. 1)	**Delete Data Retained section** -replace with sentence in the SQM referring to SDUM		**CLECs AGREE.** CLECs do not oppose so long as SDUM attached to files is current and up to date as promised.
SEEM Disagg. (BST Matrix p. 1)	**Delete entire SEEM Disagg section** - replace with "note" in the introduction reference to the SEEM plan.		**CLECs DISAGREE.** It is easier to understand metric results when you are able to make side-by-side comparisons of the SQM and SEEM

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			disaggregations for each product. If SQM and SEEM disaggregations are the same, then they only need to be listed once. If the disaggregations are different, then they should be listed separately.
Title	**Change title to every measure** - add acronym to every measure - delete existing numbering scheme	New Comment	**CLECs AGREE IN PART AND DISAGREE IN PART.** While CLECs do not oppose the addition of acronyms to the titles, we strongly DISAGREE with the arbitrary removal of the numbering scheme in the current SQM.
P-11	**Move measure from Provisioning to Ordering section of SQM**	New Comment	Customer-affecting problems from SOA errors are more in line with the provisioning errors. Thus, CLECs cannot support moving this measure from Provisioning to Ordering.
Pre-Ordering			
OSS-1 (BST matrix, p.3)	**-Delete Measure** -Modified OSS-2 to monitor degraded service that would have been captured in this measure.		**CLECs DISAGREE.** This is not a redundant measure. All other Bell Operating Company plans have both a measure of system availability and of query response times. CLECs are due parity in query response times. OSS-1 would not pick up if CSR retrieval is consistently slower for CLEC than for BST and this is the normal function, not some special degradation from an interface malfunction. CLECs rely heavily on efficient query responses, since many of these queries are done while the customer is waiting on the line. Slow response times can anger customers when several multi-second transactions are combined.
OSS-2 (BST matrix, p.3-5) (CLEC Response, Appendix B)	**-Title:** Modified Title **-Definition:** Wording clarification. **-Exclusions:** 1) Remove exclusions for degraded service; 2) Remove exclusion for Scheduled OSS Maintenance. **-Business Rules:** 1) Wording clarifications;	**-Disagg:** Modify Appendix C to include Batch Scheduler, EXACT, SOEG, LMU, and LQS as OSS Interface types.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** CLECs agree with the caveat that scheduled availability only excludes set maintenance window. **Exclusions: CLECs AGREE IN PART.** Agree not to exclude degraded service but would like to keep scheduled maintenance as only time of day exclusion.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	2) Added language to define degraded service; 3) Delete note on hours of schedule maintenance. **-Calculation:** 1) Clarify full outage calculation; 2) Added total outage calculation **-Report Structure:** Wording modifications. **-Disagg:** 1) Added Total Outage; 2) Modified Appendix D. **-Standard:** Added Total Outage as a diagnostic measure. **-SEEM:** No changes.		exclusion. **Business Rules: CLECs DISAGREE.** CLECs believe full outages and degraded service impairments should be part of remedied metric. Total outages should be the remedied calculation. CLECs want to keep language and have a say on when maintenance should be scheduled to keep from impeding their business plans. CLECs would not oppose a definition, agreed to in change control, ofn what degraded service is to merit inclusion. **Calculation: CLECs AGREE.** CLECs agreement is contingent upon Total Outages being the remedied calculation. **Report Structure: CLECs AGREE.** So long as all interfaces used by CLECs continue to be covered, the change is acceptable. **Disagg: CLECs AGREE IN PART AND DISAGREE IN PART.** 1) **CLECs AGREE.** BST may disaggregate full outages separately from total outages. 2) **CLECS DISAGREE.** PSIMS should be included or alternatively, BST should confirm what system replaced PSIMS. Are COG and DOM still functioning or has SGG replaced these systems? Appendix C should be modified to include Batch Scheduler, EXACT, SOEG, LMU, and LQS as OSS Interface types. **Standard: CLECs DISAGREE.** 99.5% standard should apply to total outage, not full outages only. **SEEM: No Changes**
OSS-3 (BST matrix, p. 5-8)	**-Title:** Modified Title **-Definition:** Wording clarification. **-Exclusions:** Remove exclusion for degraded service. **-Business Rules:** 1) Wording clarifications;		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** CLECs agree so long as scheduled availability only excludes set maintenance window. **Exclusions: CLECs AGREE.**

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	2) Added language to define degraded service. **-Calculation;** 1) Clarify full outage calculation; 2) Added total outage calculation. **-Report Structure;** Wording modifications. **-Disagg:** 1) Added Total Outage; 2) Modified Appendix D. **-Standard:** Added Total Outage as a diagnostic measure. **-SEEM:** No changes.		**Business Rules: CLECs DISAGREE.** CLECs believe full outages and degraded service impairments should be part of remedied metric. Total outages should be part of the remedied calculation. CLECs want to keep language and have a say on when maintenance should be scheduled to keep from impeding their business plans. CLECs would not oppose a definition, agreed to in change control, of what degraded service is to merit inclusion. CLECs request further discussions with BST on definition of "degraded service." CLECs are not quite sure about the origin of BST's definition of "degraded service." **Calculation: CLECs AGREE.** CLECs agreement is contingent on total outages being the remedied calculation. **Report Structure: CLECs AGREE.** So long as all interfaces used by CLECs continue to be covered, the change is acceptable. **Disagg: CLECs AGREE.** BST may disaggregate full outages separately from total outages. **Standard: CLECs DISAGREE.** 99.5% standard should apply to total outages not full outages only. **SEEM:** No Changes.
OSS-4 (BST matrix, p.9)	**-Delete Measure.** -Modified OSS-3 to monitor degraded service that would have been captured in this measure.		**CLECs DISAGREE.** CLECs need to monitor whether responses are slower than BST's, thus requiring more personnel, resources and time to handle maintenance transactions. Degraded service does not indicate whether parity in response times does not exist. Other Bell Operating Company plans contain both a query response time and system availability metric.
PO-1 (BST matrix, p.9)	**-Delete Measure** (low volume and low impact).		**CLECs DISAGREE.** CLECs need to have manual loop validation handled quickly. Low volumes are due to the uncertain future of certain data access products. CLECs need to analyze BST's data regarding volume. CLECs request that BST confirm

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			under what conditions a CLEC must request manual loop makeup.
PO-2 (BST matrix, p. 9-11)	-Title: Modified title. -Definition: Remove capturing of average interval. It's a redundant way of stating performance—percent of response returned is used for monitoring performance. -Exclusions: Added exclusions for Scheduled OSS Maintenance and Test Transactions/Records. -Business Rules: Wording clarifications. -Calculations: Delete calculation for average interval. -Report Structure: 1) Delete regional report; 2) Delete irrelevant report buckets. -Disagg: Wording Clarification. -Standard: No changes. -SEEM: No changes.		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section. Definition: CLECs AGREE. CLECs accept deletion of average interval. BST should, however, be able to produce data on averages and dispersions to review the benchmark for this measure as may be requested in six-month reviews. Exclusions: CLECs AGREE. New exclusions are acceptable so long as test transactions do not include orders for live customers even if they are the first transactions for a new product. Business Rules: CLECs AGREE. CLECs accept use of generic terms as long as all types of interfaces/gateways used by CLECs for this activity are covered. Calculation: CLECs AGREE. CLECs do not oppose eliminating average interval metric. But BST must be willing to provide data needed to evaluate benchmarks in future six-month review. Report Structure: CLECs AGREE. CLECs do not oppose elimination of disaggregations. Disagg: CLECs AGREE. Standard: No Change SEEM: No Change
Bulk Migration Response Time (BST matrix, p.11-12)	-New Measure -Captures response time for bulk migration orders. -Not proposed to be added as a Tier 1 or Tier 2 measure.		CLECs AGREE. CLECs support adding a metric that measures bulk migration response times. The details of metric need to be reviewed and compared to CLEC proposals for bulk hot cuts in collaborative meetings. CLECs DISAGREE. CLECs oppose omitting a benchmark and inclusion in the SEEM plan. CLEC NOTE: The timing and need for this measure should be discussed at the Sep. 2 workshop.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<<Sharon Norris w/ AT&T>>
Ordering			
O-1 (BST matrix, p.13)	-**Delete Measure.** -This measure is of minimal use to evaluate performance. An acknowledgement is simply an electronic signal that tells a CLEC's computer that a transaction was successfully received.		**CLECs DISAGREE.** This is the first warning that orders are not being processed. MCI, for one, had lots of orders lost in system in September 2003 after BST made some software changes. The remedies generated caused BST to promptly fix the problems so MCI was not stalled into the next month in getting orders through the system. This metric is critical to catching systems' problems before they lead to thousands of angry customers that may switch back to BST.
O-2 (BST matrix, p.13-14)	-**Title**: Modified title. -**Definition:** Wording clarification. -**Exclusions:** Added exclusion for Test Transactions/Records. -**Business Rules:** Wording clarification and deletion of irrelevant note. -**Calculation:** Wording clarification. -**Report Structure**: Deletion of irrelevant note. -**Disagg:** Combined interfaces types (EDI and TAG). -**Standard:** Revised benchmark from 99.9% to 99.5% -**SEEM:** Remove from Tier 1.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** **Exclusions: CLECs AGREE.** CLECs agree to exclusions so long as test transactions are never defined as those involving live customers. **Business Rules: CLECs AGREE.** CLECs do not oppose use of general interface language so long as all systems used are covered. Removal of note is accepted. **Calculation: CLECs AGREE.** **Report Structure: CLECs AGREE. Disagg: CLECs AGREE.** So long as CLEC's gateway is covered in metric. **Standard: CLECs DISAGREE.** CLECs oppose weakening of benchmark on this metric. System likely will start missing many when it begins to fail, making slight change proposed by BST irrelevant. **SEEM: CLECs DISAGREE.** CLECs see no reason to eliminate Tier I remedies as the loss of orders at this initial state creates burdens for CLECs and potential problems meeting customer requirements for service delivery.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
O-3 (BST matrix, p.14-17) (CLEC Response, Appendix B)	**-Title:** Modified title. **-Definition:** Wording clarification. **-Exclusions:** 1) Remove exclusion for Scheduled OSS Maintenance; 2) Add exclusions for Test Transactions/Records and LSRs that receive a Z status. **-Business Rules:** 1)Wording clarifications; 2) Removed categories for manual fallout and make categories available on PMAP website; 3) Remove flow-through matrix and provided PMAP website where it can be found. **-Calculation:** Remove Achieved Flow-through calculation. Not used to measure performance. **-Report Structure:** Add CLEC Specific report (0-4 combined into this measure) **-Disagg:** 1) Roll-up Res and Bus into Resale; 2) Roll-up UNE-L and UNE-P into UNE **-Standard:** 1) Delete Res benchmark of 95% and Business benchmark of 90% Both rolled-up into Resale with 90% benchmark; 2) Delete UNE-L benchmark of 85% and UNE-P benchmark of 90%. Both rolled-up into UNE with a benchmark of 85%. **-SEEM:** No changes **-MISC:** Note provided to explain availability of flow-through error analysis and CLEC LSR information.	**-Disagg:** Add UNE-L with LNP as a level of disagg. **Standard:** 1) Increase benchmark for UNE-L from 85% to 95%; 2) Increase benchmark for LNP from 85% to 95%; 3) Add benchmark of 95% to UNE-L with LNP. **SEEM:** Add UNE-L with LNP to SEEM Tier 2.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** **Exclusions: CLECs AGREE.** CLECs believe these exclusions are acceptable so long as test orders are not defined as involving live customers and BST provides more information on how Z designation gets applied and how CLECs can verify proper use of this exclusion. **Business Rules: CLECs AGREE.** CLECs do not oppose clarifications and wording change and reference to web site. CLECs expect list to expand and not retract from current flow through capabilities, so list is not to be shortened from levels defined currently in metric. **Calculation: CLECs DISAGREE.** CLECs believe view of total ordering that flows through is critical. It is not enough only to see percentage rates for orders designed to flow through. CLECs and the PSC need to monitor whether BST is being responsive to adding products and features CLECs most order to flow through eligibility list. **Report Structure: CLECs AGREE.** CLECs do not oppose adding CLEC-specific and aggregate results in the same metric so long as achieved disaggregation is retained. CLECs request that BST provide examples of how the reports will differ, if at all, before we close this issue. **Disagg: CLECs DISAGREE.** CLECs oppose collapsing disaggregations and urge adoption of their proposed addition to better monitor UNE-L with LNP flow through. UNE-P flow-through could mask problems with UNE-L flow-through. if combined, because of current volume differences. **Standard: CLECs DISAGREE.** CLECs do not believe existing standards are appropriate, particularly under BST's proposal to collapse disaggregations.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			SEEM: CLECs DISAGREE. CLECs oppose losing the deleted disaggregations in SEEM as problems with flow through for certain problems would go hidden and un-remedied if combined with a large-volume product with high flow- through rates.
O-4 (BST matrix, p. 17)	**-Delete Measure.** -Data will be captured in proposed modifications to O-3.		**CLECs AGREE.** CLECs do not oppose deleting this measure, so long as information captured here becomes part of O-3 with no change in SEEM classifications.
Flow-Through Error Analysis (BST matrix, p. 17)	**-Delete Measure (not a measure)** -Will post error analysis with the flow-through report and add information for obtaining error analysis in a footnote to O-3.		**CLECs AGREE.** CLECs do not oppose this being a web posting instead of being part of the SQM.
O-6 (BST matrix, p. 17)	**-Delete Measure.** -BST will provide website where CLEC LSR info can be found for CLECs who elect to subscribe for info. Add footnote to O-3 describing how to obtain CLEC LSR info.		**CLECs AGREE.** CLECs do not oppose having to subscribe to this information so long as notice is given before PMAP reporting ends and subscription must start and all data remains identical to prior format.
O-7 (BST matrix, p. 17) (CLEC Response, Appendix B)	**-Delete Measure.** -Info can be ascertained by reviewing data from Reject Interval.	**Exclusions:** Modify project exclusion so batch hot cuts will not be excluded.	**CLECs DISAGREE.** This measure allows CLECs the ability to measure reject intervals. It is imperative that CLECs are able to see how many of their orders are being rejected by BST. CLECs have also proposed an additional disaggregation to see if batch hot cut orders get rejected. BST rejection errors have been a problem for at least one CLEC in the coalition. Specifically, ITC^DeltaCom has been receiving invalid rejects and clarifications. These are costly and require re-processing and delay customer service delivery. A list of these invalid rejects/clarifications has been sent to BellSouth for investigation and a call is scheduled weekly or as needed. CLECs need this measure to remain until this situation is resolved.
O-8 (BST matrix, p. 18-22)	**-Title:** Modified title. **-Definition:** Wording clarification	**Exclusions:** Modify project exclusion so batch hot cuts will not be excluded.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** CLECs do no oppose

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(CLEC Response, Appendix B)	**-Exclusions:** 1) Remove exclusion for Center specific hours; 2) Modified project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations will not be excluded; 3) Add exclusions for Scheduled OSS/Maintenance and Test Transactions/Records. **-Business Rules:** 1) Wording Clarifications; 2) Provided web address for hours of operations; 3) Added note to reflect the Bulk Migration process. **-Calculation:** Delete Average Reject Interval Calculation, not used to state performance. **-Report Structure:** Delete interval buckets not relevant to standard---can be obtained from raw data. **-Disagg:** Delete product disagg.---little to no volume for many products. Product level can be obtained from raw data. **Standard:** 1) Revise Partially Mech benchmark from 95%<=10 hours to 90%<=10 hours; 2) Revise Non-Mech benchmark from 95%<=24 hours to 85%<=18 hours; 3) Revise LIT from 95%<=36 hours to 85%<=4 days -Benchmarks revised in attempt to regionalize benchmarks for all BST states. **-SEEM:** Remove from Tier 1 and Tier 2		discussing issues removed from definition in business rules. **Exclusions: CLECs AGREE.** CLECs agree this measure should cover batch hot cuts. CLECs will also accept additional exclusions so long as test orders are not defined as those involving live customers. CLECs are unclear on how BST intends to account for non-business hours. This requires further discussion. In the Exclusion that begins "LSRs identified as "Projects...," the wording needs to be changed from "UNE- P" to "UNE-L" only. **Business Rules: CLECs AGREE.** CLECs do not oppose changes except for indication that business hours apply to fully-mechanized orders. Only schedule system down time should be applied here. Any web posting should not expand scheduled down time from current hours without CLEC acceptance. **Calculation: CLECs AGREE.** CLECs do not oppose eliminating average interval so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks. **Report Structure: CLECs AGREE.** CLECs do not oppose elimination of dispersion buckets so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks. **Disagg: CLECs DISAGREE.** CLECs may agree to combine some products, (e.g. INP and LNP), but not to eliminate all disaggregations as doing so would mask differences in performance. **Standard: CLECs DISAGREE.** CLECs do not see reason to lessen benchmarks particularly since BST's were less stringent than many other Bell companies. **SEEM: CLECs DISAGREE.** CLECs see no reason why long reject intervals that can lead to delays in getting an order accepted and moved toward timely provisioning should be eliminated

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			from the remedy plan.
O-9 (BST matrix, p. 22-28) (CLEC Response, Appendix B)	-**Title:** Modified title. -**Definition:** Wording clarifications -**Exclusions:** 1) Remove exclusion for Center specific hours; 2) Modified project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations will not be excluded; 3) Add exclusions for Scheduled OSS/Maintenance and Test Transactions/Records. -**Business Rules:** 1) Wording Clarifications; 2) Provided web address for hours of operations; 3) Added note to reflect the Bulk Migration process. -**Calculation:** Delete of Average FOC Interval calculation, not used to state performance. -**Report Structure:** Delete interval buckets---can be obtained from raw data -**Disagg:** Delete product disagg.---little to no volume for many products. Product level can be obtained from raw data. -**Standard:** 1) Revise Partially Mech benchmark from 95%<=10 hours to 90%<=10 hours; 2) Revise Non-Mech benchmark from 95%<=24 hours to 90%<=24 hours; 3) Revise LIT from 95%<=48 hours to 95%<=10 days. -Benchmarks revised in attempt to regionalize benchmarks for all BST states. -**SEEM:**Remove from Tier 1 and Tier 2.	**Exclusions:** Modify project exclusion so that LNP (standalone) and batch hot cuts will not be excluded. **Disagg:** Add LNP Standalone (Projects) as a level of disagg. **Standard:** Add benchmarks for LNP Standalone (Projects) -- 95% within 24 hours (1-10 numbers), 95% within 48 hours (11-999 numbers). **SEEM:** Include new LNP Standalone disagg. in SEEM Tier 1 and Tier 2.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs DISAGREE.** CLECs oppose taking out facilities check provison. BST has not provided any reason to overturn this part of the PSC's original order and reconsideration decision to retain it. CLECs were even open to considering impact on intervals in past but no evidence was provided by BST. The facilities check ensures that meeting FOC timeliness does not mean that BST may provide any due date on the first FOC whether it knows if it can live up to it or not. **Exclusions: CLECs AGREE IN PART.** CLECs agree this measure should cover batch hot cuts. CLECs also accept additional exclusions so long as test orders are not defined as those involving live customers. CLECs are unclear on how BST intends to account for non-business hours. This requires further discussion. In the Exclusion that begins "LSRs identified as "Projects...," the wording needs to be changed from "UNE- P" to "UNE-L" only. **Business Rules: CLECs AGREE.** CLECs do not oppose changes except for indication that business hours apply to fully mechanized orders. Only schedule system down time should be applied here. Any web posting should not expand scheduled down time from current hours without CLEC acceptance. **Calculation: CLECs AGREE.** CLECs do not oppose eliminating average interval so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks. **Report Structure: CLECs AGREE.** CLECs do not oppose elimination of dispersion buckets so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks. **Disagg: CLECs DISAGREE.** CLECs may agree to collapsing some but not all product categories as

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			doing so would mask differences in performance. **Standard: CLECs DISAGREE.** CLECs do not see reason to lessen benchmarks particularly since BST's were less stringent than many other Bell companies. **SEEM: CLECs DISAGREE.** CLECs see no reason why long FOC intervals that can keep CLEC from informing customers of due dates should be eliminated from the remedy plan.
O-10 (BST matrix, p. 29)	**-Delete Measure.** -This measure captures an extremely small number of orders and the interval for this measure is captured in O-9.		**CLECs AGREE.**
O-11 (BST matrix, p. 29-31) (CLEC Response, Appendix B)	**-Title:** Modified title. **-Definition:** Wording clarification. **-Exclusions:** 1) Modified project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations will not be excluded; 2) Add exclusion for Test Transactions/Records. **-Business Rules:** 1) Wording Clarifications; 2) Added note to reflect the Bulk Migration process. **-Calculation:** No changes. **-Report Structure:** 1) Wording clarifications; 2) Delete regional report. **-Disagg:** Delete product disagg.---little to no volume for many products. Product level can be obtained from raw data. **-Standard:** No changes. **-SEEM:** Remove from Tier 1.	**Exclusions:** Modify project exclusion so batch hot cuts will not be excluded.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** **Exclusions: CLECs AGREE.** **Business Rules: CLECs AGREE.** CLECs do not oppose changes or additions for bulk hot cuts, but would like explanation of assignment to disaggregation category. **Calculation: No Changes** **Report Structure: CLECs AGREE.** **Disagg: CLECs DISAGREE.** CLECs may agree to combine some categories but not all as doing so would mask differences in performance. **Standard: No Changes** **SEEM: CLECs DISAGREE.** CLECs oppose removal of Tier I remedies. BST has not explained why missing FOCs and Rejects do not harm their individual relationships with customers.
O-12	**-Delete Measure**		**CLECs DISAGREE.** CLECs do not believe this

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p. 32)	-Timeliness of answer in the LCSC is not directly affecting CLECs ability to provide service. Orders are not placed by phone; CLEC is calling to get info.		metric is unnecessary. Long hold times can burden staff serving customers and delay resolution of customer-affecting problems.
P-11 (BST matrix, p. 32-35)	-**Title:** Modified title (Move measure from Provisioning to Ordering) -**Definition:** Wording clarifications -**Exclusions:** 1) Remove exclusion for CLEC LSRs submitted manually; 2) Add exclusion for LSRs identified as projects. -**Business Rules:** Wording clarifications. -**Calculation:** Wording Clarification -**Disagg:** No changes -**Standard:** No changes -**SEEM:** No changes		**Title: CLECs DISAGREE.** This measure should remain in the Provisioning section of the SQM. See also CLEC comment under SQM-All Measures section. **Definition: CLECs DISAGREE.** Customer-affecting problems from SOA errors are more in line with the provisioning errors. **Exclusions: CLECs DISAGREE.** CLECs disagree on the exclusion of project orders, as these are typically large and very customer-impacting. CLECs also disagree to excluding LCSC/System workarounds. All elements should be compared to the CLEC's requested service order. LSRs coded as projects, particularly those for batch hot cuts should not be excluded from determining if the order was provisioned as requested by the CLEC. CLECs want to ensure that listing orders are part of what is being measured. CLECs request that BST confirm that test orders are not defined as orders involving live customers. **Business Rules: CLECs DISAGREE.** CLECs want to add "considered" to read "…workarounds which will not be *considered* service affecting…," in the first sentence of 2nd paragraph under BST LSR Fields. **Calculation: CLECs DISAGREE.** CLECs may agree if deletion of the word applicable does not expand the denominator of LSRs beyond those subject to the automatic checking of accuracy. **Report Structure: CLECs AGREE.** **Disagg: No changes** **Standard: No changes** **SEEM: No changes**

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	Provisioning		
P-1 (BST matrix, p. 36)	**-Delete Measure** -Orders captured in this measure would be included in the proposed FOCI and proposed PIAM measures. -Transaction volumes are too small to be useful to evaluate performance.	Retain Existing SQM. Tool to evaluate services which are experiencing delays. CLECs order tracking systems are better equipped to monitor and validate this measure as opposed to the FOCI & PIAM.	**CLECs DISAGREE.** This measure should remain in the SQM. It serves as a tool to evaluate services that are experiencing delays. BST's order tracking systems for CLECs are better equipped to monitor and validate this measure as opposed to the FOCI and PIAM measures.
P-2A (BST matrix, p. 36)	**-Delete Measure** -Performance for Jeopardy has not been a problem. -The interval captured in this measure is included in the proposed FOCI.		**CLECs DISAGREE.** Having orders placed in jeopardy is a critical concern to CLECs for many reasons, not the least of which is that it directly impacts customer satisfaction. During the 6-month review in LA, Staff pointed out that just because BST does not provide jeopardy notices to its retail end users, does not mean that they should not give jeopardy notices to its wholesale customers. Since BST provides jeopardy notices to itself, it must provide jeopardy notices to the CLECs. So whether BST gives jeopardy notices to its retail customers has no bearing on their obligation to provide wholesale customers with jeopardy notices. In addition, as facilities-based competition increases, the number of jeopardies may also increase. It should cause BellSouth no harm to continue reporting this measure since the mechanisms are already in place to track and capture this data. The CLECs cannot support the deletion of this measure.
P-2B (BST matrix, p. 37)	**-Delete Measure** -Minimal impact on CLECs		**CLECs DISAGREE.** Clearly, the % of orders given jeopardy notices, when compared to retail, is very important to CLECs. BST is attempting to make changes that are burdensome to the CLECs and that prohibit CLECs from having a clear comparison of service.
P-3 (BST matrix, p.37-40)	**-Title:** Modified title (from % missed to % met) **-Definition:** Changed to reflect percent of installation appointments met.		**Title: CLECs DISAGREE.** Modifying the title of this measure from "missed", which clearly points out the intent of the measure, to "met" is not a fair

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-**Exclusions:** Removed Exclusion for End User Misses -**Business Rules** : Changed to reflect percent of installation appointments met. -**Calculation:** Changed to reflect percent of installation appointments met -**Report Structure:** 1) Changed to eliminate categories with little to no volume; 2) Delete regional report. -**Disagg:** Remove products with low volume -**Standard:** parity (see disagg changes) -**SEEM:** No changes.		representation of the real issue at hand -- the number of installation appts BST misses. The CLECs' tracking systems were established for the purpose of tracking misses from the customer's point of view. BST's reasons for missing the appt should be clearly noted. Also, see CLEC comment under SQM – All Measures. **Definition: CLECs DISAGREE.** CLECs do not support changing the measure from missed to met. **Exclusions: CLECs DISAGREE.** Currently, technicians remove inside wire/jacks or report misses when their allotted time cannot be met. Excluding test orders is questionable since the determination of these orders is not defined. BST is attempting to re-define "Cancelled Service Orders." Previously, only service orders cancelled before the due date were allowed to be excluded, but now BST wants to exclude ALL cancelled service orders regardless of when they were cancelled. **Business Rules: CLECs DISAGREE.** BellSouth has limited this measure to capture only the first missed appointment reason code entered on a service order. This limits the measure's effectiveness because missed appointment codes are used every time a service order's due date is changed. So for example, if CLECs supplement an order for a new due date, BST will apply a subscriber-missed appointment code and that service order will be excluded from this measurement. CLECs believe that ANY BellSouth missed appointment code should be counted as a BellSouth miss - regardless of whether the order had a previous subscriber-missed appointment. Just because a due date was missed shouldn't give BellSouth carte blanche to miss future install dates. SBC's Missed Appointment measure counts any SBC missed reason and so should BST's. **Calculation: CLECs DISAGREE.** **Report Structure: CLECs DISAGREE.** BST appears to be removing categories where there

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			performance has typically been problematic. **Disagg: CLECs DISAGREE.** BST appears to be removing product disaggregations where there performance has typically been problematic. **Standard: CLECs DISAGREE.** **SEEM: No Changes**
FOCI- FOC Average Completion Interval (BST matrix, p. 40-44)	**-New measure** -Combines intervals to return a FOC and to complete a service order into a single interval measure. -Added to SEEM Tier 1 and Tier 2.		**CLECs DISAGREE.** While CLECs requested a measure of this type, this measure, as constructed, is absolutely inappropriate and completely and unequivocally rejected by the CLECs. The artificial padding of intervals that include ILEC "FOC" times render this measure completely useless for monitoring for discrimination. Further, the information reported by this measure is misleading because it reports service intervals for ILEC customers that never occurred. This measure, although in place in Georgia, at least has no SEEM impact in that state and so the effect of its harmful data is somewhat mitigated. However, BST has the audacity to propose that this farce of a metric be the basis for its penalty payments for both FOC and OCI in Florida.
P-4 (BST matrix, p. 44) (CLEC Response, Appendix B)	**-Delete Measure** -This info is now included in the proposed FOCI measure.	**Disagg:** Add disagg for batch hot cuts. **Standard:** Batch Hot Cuts 98% in 5 days	**CLECs DISAGREE.** This is a key measure and one where CLECs currently track BST's performance. BST's proposed changes will mask the parity comparison.
P-5 (BST matrix, p. 45)	**-Delete Measure** -CLECs can check order status in CSOTS. This is parity measure, but actually better service than that provided to retail because retail does not get a notification that a service order is complete.		**CLECs DISAGREE.** Real-time CSOTS does not exist. BST's current systems clearly status the life of an order, as well as, clearly indicate completion and error status following completion of the order.
P-6 (BST matrix, p. 45)	**-Delete Measure** -Another measure of FOC Timeliness which is already measured in FOCT and proposed FOCI.		**CLECs DISAGREE.** A CLEC's credibility to its customer depends on its accuracy in scheduling appointments. If CLECs are unable to notify their customers and arrange for access to a customer's

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Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			premises, the customer may be lost to a win-back.
P-7 (BST matrix, p. 45-47) (CLEC Response, Appendix B)	**-Title:** Modified title. **-Definition:** Wording clarification to include time to notify CLEC after hot cut is complete. **-Exclusions:** 1) Remove exclusion for Unbundled Loops where there is no existing subscriber loop; 2) Add exclusion for non-coordinated conversions; 3) Add exclusion for BellSouth or CLEC internal or administrative orders; 4) Add exclusion for listing orders. **-Business Rules:** Revised to reflect start and stop times which includes CLEC notification time. **Calculation:** Revised to include CLEC notification time. **-Report Structure:** 1) Delete unnecessary interval buckets. 2) Delete regional report. **-Disagg:** Roll-up INP and LNP loops into one disagg. category. CCC (loops) **-Standard:** Revise benchmark of 95%<=15 minutes to 95%<=20 minutes to account for adding CLEC notification time to the interval. **-SEEM:** No changes.	**Title:** Include Non-Coordinated Conversions in this measure. **Business Rules:** Stop time is notification to the CLEC that the cut is complete. **Calculation:** Include Non-Coordinated Conversions **Disagg:** Add additional migration types (See CLEC Comments p. 5) **Standard:** Revise benchmark of 95% <= 15 minutes to 95% <= 10 minutes	**Title: CLECs DISAGREE.** Non-Coordinated Conversions should be included in this measure. See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** **Exclusions: CLECs DISAGREE.** Non-Coordinated Conversions should be included in this measure. **Business Rules: CLECs DISAGREE.** The Start Time should be when the loop is actually disconnected. The Stop Time is notification to CLECs that the cut is complete. **Calculation: CLECs DISAGREE.** Include Non-Coordinated Conversions. **Report Structure: CLECs DISAGREE.** Interval breaks out points to those areas for concern. **Disagg: CLECs DISAGREE.** Add additional migration types (See CLEC Comments p. 5) **Standard: CLECs DISAGREE.** Revise benchmark of 95% in less than or equal to 15 minutes to 95% in less than or equal to 10 minutes. **SEEM: No changes.**
P-7A (BST matrix, p.47-50) (CLEC Response p. 5 and Appendix B)	**-Title:** Delete reference to average interval in title. Average interval not used to evaluate performance. **-Definition:** Wording clarification. **-Exclusions:** 1) Remove exclusion for test orders; 2) Add exclusion for BellSouth or CLEC internal or administrative orders; 3) Add exclusion for listing orders. **-Business Rules:** Modified to identify intervals for IDLC and non-IDLC loops **-Calculation:** Delete calculations for interval and average interval, not	**Disagg:** Add additional migration types **Business Rules:** define criteria for test order exclusions.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** **Exclusions: CLECs AGREE.** . Need to define criteria for test order exclusions. **Business Rules: CLECs DISAGREE** **Calculation: CLECs AGREE.** **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE IN PART AND DISAGREE IN PART.** Need to add additional

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	used to evaluate performance. **-Report Structure:** 1) Remove requirement to report results in three separate distributions; 2) Delete regional report; 3) Delete unnecessary interval buckets. **-Disagg:** 1) Delete SL1 and SL2 time and non-time specific. 2) New disagg of Non-IDLC and IDLC. **-Standard:** Benchmark for IDLC 95% within + or -2 hours of scheduled start time. **-SEEM:** No changes.		migration types, e.g. EELS, and hot cuts away from loops and EELs to UNE-P and resale. CLECs will support collapsing SL1 and SL2. **Standard: CLECs AGREE.** **SEEM: No Change**
P-7B (BST matrix, p. 50-51) (CLEC Response p. 5 and Appendix B)	**-Title:** Modified Title **-Definition:** Wording clarification (simplified) **-Exclusions:** 1) Wording Clarification; 2) Remove exclusion for test orders; 3) Add exclusion for BellSouth or CLEC internal or administrative orders; 4) Add exclusion for listing orders. **-Business Rules:** 1) Wording clarification; 2) Add language to capture the overall percentage of orders. **-Calculation:** 1) Wording clarification; 2) Add calculation for overall percentage. **-Report Structure:** Delete regional report. **-Disagg:** Roll-up INP and LNP loops to CCC (loops). **-Standard:** Remove benchmark of <=5 hours and make diagnostic for CCC (loops). **-SEEM:** No changes.	**-Title:** Include Non-Coordinated Customer Conversions in this measure **-Definition:** Include Non-Coordinated Customer Conversions **-Exclusions:** Add exclusion for test orders **-Business Rules:** Include Non-Coordinated Customer Conversions **Disagg:** Add additional migration types – **Standard:** Revise benchmark of <= 5 hours to <= 2 hours. **-SEEM:** Add to SEEM Tier 1 and Tier 2.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs DISAGREE.** Add non-coordinated. **Exclusions: CLECs DISAGREE.** Add back with CLEC agreement. **Business Rules: CLECs DISAGREE.** These changes require further discussion at Sep. 2 workshop between CLECs and BST. **Calculation: CLECs DISAGREE.** These changes require further discussion at Sep. 2 workshop between CLECs and BST. **Report Structure: CLECs AGREE.** **Disagg: CLECs DISAGREE.** EELs should be added as a separate disaggregation. **Standard: CLECs DISAGREE.** Performance should improve rather than ask CLECs to accept a lower standard. **SEEM: No Changes**
P-7C	**-Title:** Changed from 7 days to 5 days.	**-Definition:** Include Non-Coordinated Customer	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. Leave days "as

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p. 52-53) (CLEC Response p. 5 and Appendix B)	**-Definition:** Wording clarifications and change from 7 days to 5 days **-Exclusions:** 1) Wording clarifications; 2) Add exclusion for listing orders; 3) add exclusion for BellSouth or CLEC internal or administrative orders; 4) Add exclusion for troubles outside of BellSouth's control; 5) Add exclusion for disconnect orders. **-Business Rules:** Wording clarification and change from 7 days to 5 days. **-Calculation:** Wording clarification and change from 7 days to 5 days. **-Report Structure:** 1) Delete dispatch/non-dispatch reports 2) Delete regional report. **-Disagg:** Roll-up UNE loops design and non-design into UNE loops. **-Standard:** Revise benchmark of <=3% to <=5% **-SEEM:** Remove from SEEM Tier 1 and Tier 2.	Conversions. **-Exclusions:** Add exclusion for test orders. Define troubles outside BST control. **-Business Rules:** Include Non-Coordinated Customer Conversions. **Disagg:** Add additional migration types **Calculation:** Include Non-Coordinated Customer Conversions. **Standard:** No Change Seem: No Change	is." **Definition: CLECs DISAGREE.** Leave days "as is." **Exclusions: CLECs DISAGREE.** This issue requires further discussion at Sep. 2 workshop. **Business Rules: CLECs DISAGREE IN PART.** CLECs accept other changes, but do not support change from 7 days to 5 days. **Calculation: CLECs DISAGREE.** CLECs do not support change from 7 days to 5 days. **Report Structure: CLECs DISAGREE.** Regional reports and those separately dispatch from non-dispatch are meaningful. **Disagg: CLECs DISAGREE.** Loop type is a meaningful difference. Add disaggregation for EELs. **Standard: CLECs DISAGREE.** Performance should improve rather than ask CLECs to accept a lower standard (i.e., from <= 3% to <= 5%). **SEEM: CLECs DISAGREE.**
CNDD: Non-CCC Percent Completed and Notified Due Date (BST matrix, p. 53-54)	**-New measure.** Measures the percentage of non-coordinated conversions that BellSouth completed and provided notification to the CLECs on the due date.		**CLECs AGREE.**
P-7D: Coordinated/Non-coordinated Customer Conversions-Percent Without Service Disruption (CLEC Response, Appendix A, p. 5-6)		**-New Measure** Measures the percentage of hot cuts that are completed without a loss of service due to BellSouth-caused service interruptions outside of the initial customer cutover.	
P-8 (BST matrix, p. 54)	**-Delete Measure** -represents a small number of orders and the customer impacting event (trouble) is captured in Percent Provisioning Troubles		**CLECs DISAGREE.** This measure is a key indicator of support for xDSL testing and should not be deleted. It is imperative that CLECs receive

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	(trouble) is captured in Percent Provisioning Troubles.		trouble-loops at installation. Further, as facilities-based competition increases, so may the number of orders requiring cooperative testing. It should cause BellSouth no harm to continue reporting this measure since the mechanisms are already in place to track and capture this data. The CLECs cannot support the deletion of this measure.
P-9 (BST matrix, p. 54-56)	-**Title:** Changed from 30 days to 5 days. -**Definition:** Wording clarification and change from 30 days to 5 days. -**Exclusions:** Add exclusion for troubles outside of BellSouth's control. -**Business Rules:** 1) Wording clarifications; 2) Removed reference to D&F orders; 3) Removed reference to Standalone LNP. -**Calculations:** Wording clarification and change in conversion interval from 30 days to 5 days. -**Report Structure:** 1) Delete separate volume reports (< 10 circuits and >= 10 circuits); 2) Delete dispatch/non dispatch reports; 3) Delete regional report. -**Disagg:** 1) Remove products with low volume. 2) Modified product categories so that each product is only reported once. -**Standard:** Parity (see disagg. changes) -**SEEM:** No changes	Define exclusion, how coded for outside BST control. 30 days reflects a more complete picture of service quality. Retaain Disagg as the CLEC auditing sytems would require changes of products for which volumes may increase in the future.	**Title: CLECs DISAGREE** See CLEC comment under SQM-All Measures section. **Definition: CLECs DISAGREE.** 5 days is not a sufficient period of time. CLECs must be able to schedule and complete their portion of the provisioning process. 30 days reflects a more complete picture of service quality. CLECs might agree to 20 days since it is a more accurate reflection of provisioning troubles. **Exclusions: CLECs DISAGREE.** This exclusion is inappropriate and hard to define. It also gives technicians too much discretion in the manner in which they code these troubles. Further, BST is not harmed by the current process which allows a parity determination to be made. **Business Rules: CLECs AGREE.** **Calculation: CLECs DISAGREE.** CLECs require further discussion of changes to calculation at Sep 2 workshop. **Report Structure: CLECs DISAGREE.** BST has paid penalties on these disaggregations before. If these categories are lumped together, it will mask BST's actual performance results. **Disagg: CLECs DISAGREE.** Disaggregations should be retained, as CLEC auditing systems would require changes of products for which volumes are likely to increase in the near future. **Standard: CLECs AGREE.** Parity standard is okay, however disaggregation changes are not.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			SEEM: No Changes
P-11 (BST matrix, p. 57	Revised and moved to Ordering Section.		CLECs DISAGREE. Please see CLEC comments for this measure in the Ordering section (above).
P-13B (BST matrix, p. 57-58)	-Title: Wording clarification. -Definition:Wording clarification. -Exclusions: 1) add exclusion for BellSouth or CLEC internal or administrative orders; 2) Add exclusion for listing orders; 3) Add exclusion for Scheduled OSS Maintenance -Business Rules: Wording clarifications. -Calculations: Wording clarification. -Report Structure: Delete regional report. -Disagg: No changes -Standard: Revise benchmark from 96.5% to 95%. -SEEM: Remove from SEEM Tier 1		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section. Definition: CLECs AGREE. Exclusions: CLECs AGREE. Business Rules: CLECs DISAGREE. The proposed changes to the business rules require further discussion and clarification. Calculation: CLECs DISAGREE. The proposed changes to the calculations require further discussion and clarificaiton. Report Structure: CLECs AGREE. Disagg: No Changes Standard: CLECs DISAGREE. Performance should improve rather than ask CLECs to accept a lower standard (i.e., from 96.5% to 95%). SEEM: CLECs DISAGREE.
P-13C (BST matrix, p. 58-59)	-Title: Wording clarification. -Definition: Wording clarification. -Exclusions: 1) Add exclusion for Remote Call Forwarding, DIDs, and ISDN Data TNs; 2) Add exclusion for BellSouth or CLEC internal or administrative orders; 3) Add exclusion for zero due dated expedited orders requested by the CLEC; 4) Add exclusion for listing orders; Maintenance -Business Rules: Wording clarifications. -Calculations: Wording clarification. -Report Structure: Delete regional report.	LNP changed to LAT?? RCF, DID, and ISDN should not be excluded.	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section. Definition: CLECs DISAGREE. It is more accurate to measure the number of activations vs. orders. Exclusions: CLECs AGREE. Business Rules: CLECs DISAGREE. It is more accurate to measure the number of activations vs. orders. Calculation: CLECs DISAGREE. It is more accurate to measure the number of activations vs. orders. Report Structure: CLECs AGREE.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-**Disagg:** Remove Standalone -**Standard:** insert >= sign -**SEEM:** Remove from SEEM Tier 1		**Disagg: CLECs DISAGREE.** Changes to the levels of disaggregation require further discussion. **Standard: CLECs AGREE.** **SEEM: CLECs DISAGREE.**
P-13D (BST matrix, p. 59-60)	-**Title:** Wording clarification-measure is not an interval rather a percent within interval -**Definition:** Wording clarification. -**Exclusions:** 1) Wording clarifications; 2) Remove exclusion for orders which are candidates for 10 digit triggers. -**Business Rules:** Wording clarifications. -**Calculations:** 1) Revise calculation to be based on number of non-triggerable orders. 2) Delete interval calculation, performance is based on percentage. -**Report Structure:** Delete regional report. -**Disagg:** Roll-up LNP Working Hours and LNP Unscheduled After hours into LNP. -**Standard:** Revise benchmark from 95% <= 4 hours to 95% <= 12 hours. -**SEEM:** Remove from SEEM Tier 1		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. BellSouth is attempting to hamper the usefulness of this important measure in several ways, including, but not limited to: • Changing standard from 4 hours to 12 (while at the same time retaining a non-business hour exclusion) • Changing the calculation from telephone number to service order. • Removing it from Tier 1 SEEM. **Definition: CLECs DISAGREE.** **Exclusions: CLECs AGREE.** **Business Rules: CLECs DISAGREE.** **Calculation: CLECs DISAGREE.** See above comment. **Report Structure: CLECs AGREE.** **Disagg: CLECs DISAGREE.** **Standard: CLECs DISAGREE.** See above comment. **SEEM: CLECs DISAGREE.** See above comment.

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Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
P-14 Percent of Customer Trouble Tickets Closed Electronically (CLEC Response, Appendix A, p. 3-4)		**-New Measure** Measures the percent of customer trouble tickets during the reporting period that are closed electronically by a BellSouth technician.	
P-14 Percent of Batch Hot Cuts Started On Time (CLEC Response, Appendix A pps. 7-8)		**-New Measure** Measures the percentage of time that BellSouth begins performing batch hot cuts within 15 minutes of the committed start time. Add to SEEM Tier 1 and Tier 2.	
Maintenance and Repair			
M&R-1 (BST matrix, p. 61-62)	**-Title:** Changed title (from % missed to % met) **-Definition:** Changed to reflect percent of repair appointments met. **-Exclusions:** 1) Add exclusion for Informational Tickets; 2) Add exclusion for Troubles Outside BellSouth's Control. **-Business Rules:** 1) Wording clarification; 2) Remove note. **-Calculations:** Revise calculation to reflect percent met. **-Report Structure:** Delete regional report. **-Disagg:** 1) Roll-up products with low volume into another category; 2) Modify product categories so that each category is reported only once. **-Standard:** Parity (see disagg. changes) **-SEEM:** No changes		**Title: CLECs DISAGREE.** This measurement is used throughout the industry as "Missed Repair Appointments" and the BST change does not change the results, it only changes the reported values which makes comparisons to historical performance more difficult. This requested change does not seem to provide any value and would only cost BST to implement. Also, see CLEC comment under SQM-All Measures section. **Definition: CLECs DISAGREE.** Same reason as above. **Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART.** **1) CLECs AGREE.** However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets. **2) CLECs DISAGREE.** The language of this exclusion is overly broad. Presumably, troubles outside of BST's control would affect CLEC lines in

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			the same manner as BST retail lines. CLEC lines should still be repair at parity with BST lines. Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majure clauses).
			Business Rules: CLECs AGREE IN PART AND DISAGREE IN PART. The clarification changes made up to the words "No Access" are acceptable. However, the proposed change to "No Access" is not acceptable. BST proposed change moves "No Access" tickets from an Exclusion (not counted in the measurement) to counted as a commitment met for the measurement.
			Possible counter offer: As done in the SBC region, if a ticket is marked as "No Access" before the commit time, it is counted as a commitment met. If the ticket is marked as "No Access" after the commit time, it is counted as a commitment missed.
			Calculation: CLECs DISAGREE. See reasons above.
			Report Structure: CLECs AGREE.
			Disagg: CLECs AGREE IN PART AND DISAGREE IN PART. CLECs agree to ensure each product is only reported in one disaggregation. CLECs disagree with aggregating any products that are not repaired in the same manner/priority and that certain disaggregations are moved to diagnostic. CLECs specifically oppose removing disaggregations for Line Sharing and Interoffice Transport as BST continues to be obligated to offer these items as UNEs under Section 271 of the Act.
			Standard: CLECs AGREE IN PART AND DISAGREE IN PART. See Disagg above.
			SEEM: No Changes
M&R-2 (BST matrix, p. 62-64)	-**Title:** Modify title. -**Definition**: Wording clarification.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** CLECs agree with

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Exclusions: 1) Add exclusion for Informational Tickets; 2) Add exclusion for Troubles Outside BellSouth's Control. **-Business Rules:** Wording clarification. **-Calculations:** Wording clarification. **-Report Structure:** Delete regional report. **-Disagg:** 1) Roll-up products with low volume into another category; 2) Modify product categories so that each category is reported only once. **-Standard:** Parity (see disagg. changes) **-SEEM:** Remove from SEEM Tier 1 and Tier 2.		clarification question. Does the change from the word "reported" to the word "closed" change how BST reports results today or does this have an impact on the results? **Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART.** 1) CLECs AGREE. However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets. 2) CLECs DISAGREE. The language of this exclusion is overly broad. Presumably, troubles outside of BST's control would affect CLEC lines in the same manner as BST retail lines. CLEC lines should still be repair at parity with BST lines. Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majure clauses). **Business Rules: CLECs DISAGREE.** BST seems to be limiting this report to only "customer direct reports." This change is troublesome for a couple of reasons: 1) CLECs report troubles to BST on our customer's behalf, so technically all CLEC trouble reports are not "customer direct reports." 2) Performance should be measured for all troubles that are worked by BST regardless if the tickets are "customer direct" or initiated by BST internally. **Calculation: CLECs AGREE.** **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE IN PART AND DISAGREE IN PART.** See comments from previous measurement (M&R-1). **Standard: CLECs AGREE IN PART AND DISAGREE IN PART.** See Disagg above. **SEEM: CLECs DISAGREE**

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
M&R-3 (BST matrix, p. 64-66)	-**Title:** Wording clarification. -**Definition:** Wording clarification. -**Exclusions:** 1) Add exclusion for Informational Tickets; 2) Add exclusion for Troubles Outside BellSouth's Control. -**Business Rules:** 1) Wording clarification; 2) Add note clarifying time that has already been excluded. -**Calculations:** No changes -**Report Structure:** Delete regional report. -**Disagg:** 1) Roll-up products with low volume into another category; 2) Modify product categories so that each category is reported only once. -**Standard:** Parity. (see disagg. changes) -**SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** **Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART.** **1) CLECs AGREE.** However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets. **2) CLECs DISAGREE.** The language of this exclusion is overly broad. Presumably, troubles outside of BST's control would affect CLEC lines in the same manner as BST retail lines. CLEC lines should still be repair at parity with BST lines. Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majure clauses). **Business Rules: CLECs DISAGREE.** It seems that BST is attempting to change the stop timestamp for closing tickets (from the time ticket cleared in system to time trouble repaired). The current language suggests a system timestamp that can not be altered by users and the proposed language suggests a timestamp that can be entered/altered by end users. CLECs would prefer the system-generated timestamp whenever possible. **Calculation: No Changes** **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE IN PART AND DISAGREE IN PART.** See comments from previous measurement (M&R-1). **Standard: CLECs AGREE IN PART AND DISAGREE IN PART.** See Disagg above. **SEEM: No Changes**

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
M&R-4 (BST matrix, p. 66-68)	-**Title:** Wording clarification. -**Definition:** Wording clarification. -**Exclusions:** 1) Add exclusion for Informational Tickets; 2) Add exclusion for Troubles Outside BellSouth's Control. -**Business Rules:** Wording clarification. -**Calculations:** 1) Wording clarification to specify repeat troubles; 2) Replaced cleared date with closed date. -**Report Structure:** Delete regional report. -**Disagg:** 1) Roll-up products with low volume into another category; 2) Modify product categories so that each category is reported only once -**Standard:** Parity (see disagg. changes) -**SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE WITH MODIFICATION.** "This report measures the percentage of customer trouble reports received within thirty days of a previous <u>trouble</u> report." **Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART.** **1) CLECs AGREE.** However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets. **2) CLECs DISAGREE.** The language of this exclusion is overly broad. Presumably, troubles outside of BST's control would affect CLEC lines in the same manner as BST retail lines. CLEC lines should still be repair at parity with BST lines. Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majure clauses). **Business Rules: CLECs DISAGREE.** CLECs would like some clarification as to why different timestamps are used for LMOS and WFA. **Calculation: CLECs DISAGREE.** See above response for Business Rules regarding "cleared" vs. "closed" timestamps. **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE IN PART AND DISAGREE IN PART.** See comments from previous measurement (M&R-1). **Standard: CLECs AGREE IN PART AND DISAGREE IN PART.** See Disagg above. **SEEM: No Changes**
M&R-5	-**Delete Measure**		**CLECs DISAGREE.** This measure is an important measure used throughout the industry. This

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p.68)	Duplicative measure. Information captured in M&R-3, since maintenance durations greater than 24 hours normally involve an out service condition.		measurement is not duplicative of the MAD (M&R 3) measure as this measurement provides a firm benchmark to measure performance against. The MAD (M&R 3) measure captures averaged results, which can vary significantly from benchmarked results.
M&R-6 (BST matrix, p. 69)	-**Title:** Wording clarification. -**Definition:** No changes. -**Exclusions:** Clarify that abandoned calls represents the "volume" of abandoned calls. -**Business Rules:** Wording clarification noting that abandoned calls are not counted in volume but the time is included. -**Calculation:** Wording clarification. -**Report Structure:** No changes. -**Disagg:** Wording clarification -**Standard:** No changes-parity -**SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: No Changes** **Exclusions: CLECs AGREE.** **Business Rules: CLECs AGREE.** **Calculation: CLECs AGREE WITH MODIFICATION.** The total abandoned call duration needs to be added into the Average Answer Time. "c = Sum of all answer times + total abandoned calls duration" and "d = Total Number of Answered Calls in the reporting period". **Report Structure: No Changes** **Disagg: CLECs DISAGREE.** CLECs would like to understand the proposed change and the effects to reported results. The changes seem to be more than "Wording Clarification." **Standard: No Changes** **SEEM: No Changes**
M&R-7 (BST matrix, p. 70)	-**Delete Measure** -Few CLECs want this process anymore. BellSouth will continue to offer this service to any customer who asks for their name to be put on the E-Mail list, but the measurement of this process is not necessary.		**DISAGREE:** This measurement has some interplay with some of the other BST proposed changes. Specifically, BST is trying to add an exclusion to every measurement for "Troubles outside BST's control." BST includes examples of cable cuts as rationale for this added exclusion for which BST should not be held responsible. In this measurement (and contrary to BST's previously mentioned rationale), BST claims that network outages (like cable cuts) would still be covered by other measurements.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
		Billing	
B-1 (BST matrix, p. 70-71)	**-Title:** Wording clarification. **-Definition:** Wording clarification. **-Exclusions:** Wording clarification. **-Business Rules:** Wording clarification. **-Calculation:** Delete calculation for Measure of Adjustments (not a meaningful measurement). **-Report Structure:** 1) Delete Regional Report; 2) Delete Number of Adjustments report. **-Disagg:** Wording clarification. **-Standard:** No changes- parity. **-SEEM:** No changes		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs DISAGREE.** The clarifications BST proposes delete the reporting interval (i.e., "the current month") and render the definition too vague. The original definition in the SQM should be retained but add, "by BellSouth to wholesale and retail customers." **Exclusions: CLECs DISAGREE.** Adjustments are as a result of billing inaccuracy. Most bill dispute resolutions could be called settlements. Also, BST must be held accountable for all regulatory mandated or contract rates as backbilling by BST must be verified as accurate. **Business Rules: CLECs DISAGREE.** The business rules should be left "as is". The current rules provide detailed information on how calculation relates to the business and how the result is reported (percentage) are important to define the measure in a complete manner. **Calculation: CLECs DISAGREE.** The word clarification changing "current" month to "reporting" month would impact the measure by having to submit billing disputes within the report month. CLEC must verify the billing accuracy and often cannot get that done in the report period. **Report Structure: CLECs DISAGREE.** CLECs oppose deleting the number of adjustments, but regional report elimination is acceptable. **Disagg: CLECs AGREE.** **Standard: No Changes** **SEEM: No Changes**
B-2 (BST matrix, p. 71-73	**-Title:** Wording Clarification **-Definition:** Wording Clarification		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Business Rules: 1) Wording clarification; 2) Add language noting that CLEC bills and BellSouth bills transmitted in less than or equal to one day difference will be considered parity. -Calculation: Wording clarification. -Report Structure: Delete Regional report. -Disagg: Wording clarification -Standard: No changes-parity. -SEEM: No changes.		**Definition: CLECs DISAGREE.** Critical to measure days to receipt as delays in the bill impact the CLECs' ability to pay the bill on time. CLECs do not agree with language that 1 days' difference is parity. Statistical tests will be the judge of what is parity **Exclusions: No Change** **Business Rules: CLECs DISAGREE.** The changes result in BST not being accountable for bill delivery. The changes reflect a change in the measure the mean time to billing transmission /mailing. It changes the entire meaning of the measure from "receipt of bill" to transmission of bill -- transmission or USPS does not equal delivery in a reasonable time. **Calculation: CLECs AGREE.** **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE.** CLECs do not oppose change if no UNEs get billed out of CABs. **Standard: No Changes** **SEEM: No Changes**
B-3 (BST matrix, p. 73)	**-Delete Measure** Not a key measurement since it captures the accuracy of the packs, not the content of the packs.		**CLECs DISAGREE.** This measure provides CLECs with an accounting of BST's ability to transmit data reliably. CLECs cannot read packs if not formatted correctly. This metric is needed to determine accuracy.
B-4 (BST matrix, p. 73)	**-Delete Measure** Measurement is similar to B-5. Both measure usage data delivery, but at different points. B-4 at 30 days and B-5 at 6 days.		**CLECs DISAGREE.** CLECs need this measure to protect against back-billing of usage charges on their monthly invoices. Although B-5 may be capturing if the usage that gets billed appropriately makes its on-time benchmark, it does not pick up when BST goes back and finds it did not render a back-bill for some usage charges sent on DUFs and ADUFs to the CLEC.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
B-5 (BST matrix, p. 73-74) (CLEC Response, Appendix B)	-**Title:** Wording clarification. -**Definition:** Wording clarification and removal of last sentence which refers to a retail comparison which is not appropriate given that this measurement uses a benchmark. -**Exclusions:** No changes. -**Business Rules:** Wording clarification. -**Report Structure:** Wording clarification -**Calculation:** No changes. -**Report Structure:** No changes. -**Disagg:** Wording clarification -**Standard:** Wording clarification. -**SEEM:** No changes.	**Exclusion:** Add exclusion for non-completed calls. **Business Rules:** Add language to make clear the type of billable usage, particularly third party, that should be covered in this metric.	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs AGREE.** CLECs accept change only if BST provides retail performance at 6 months review to reset benchmarks. **Exclusions: No Changes** **Business Rules: CLECs DISAGREE.** CLECs believe the information on how soon after recording this data is expected to be sent out, even with the long interval for this metric, is important. **Calculation: No Changes** **Report Structure: No Changes** **Disagg: CLECs AGREE.** **Standard: CLECs AGREE.** **SEEM: No Changes**
B-6 (BST matrix, p. 74) (CLEC Response, Appendix B)	-**Delete Measure** -Measure is correlated to B-5 timeliness. B-6 is average days to deliver, but is not measuring anything additional that is meaningful.	**Exclusion:** Add exclusion for non-completed calls. **Business Rules:** Add language to make clear the type of billable usage, particularly third party, that should be covered in this metric.	**CLECs DISAGREE.** But CLECs might agree if a tighter benchmark is set for B-5 metric after examining data in this six-month review. Also, such data for benchmark analysis of averages and dispersions of when the data is sent also must be provided in future reviews to evaluate whether the benchmark provides parity with BST's treatment of billing for its end users.
B-7 (BST matrix, p. 74)	-**Delete Measure** BellSouth does not bill the CLEC end user and BellSouth's recurring and non-recurring charges have little impact on the CLECs billing to the end user.		**CLECs DISAGREE.** CLECs would like to keep metrics that capture problems with back-billings. Aged charges from past months are difficult to validate and disruptive to business plans and associated pricing. Both late recurring and non-recurring charges need to be captured. Ideally, those charges would be billed to the CLEC within 30 days of when the activity occurred.
B-8 (BST matrix, p. 74)	-**Delete Measure** BellSouth does not bill the CLEC end user and BellSouth's recurring and non-recurring charges have little impact on the CLECs billing to the end		**CLECs DISAGREE.** BST should be held responsible for accurate billing. This is not about CLECs billing end-user customers but the validation of bill completeness. (Ex. Covad has recently been

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	user.		back-billed non-recurring charges for almost 2000 Line Sharing customers due to BST's billing inaccuracies.) CLECs would like to keep metrics that capture problems with back-billings. Charges coming from far in the past are hard to check and disruptive to business plans. Both late recurring and non-recurring charges need to be captured if not on a bill with 30 days of when the activity occurred for which the CLEC is being billed.
B-9 (BST matrix, p. 74)	**-Delete Measure** -Measure has had no activity in last 12 months.		**CLECs TENTATIVELY AGREE.** CLECs may allow deletion but would like to discuss first whether this is designed appropriately to capture any issues that may be being brought to BST's attention but does not rely on the forms that are counted in the measure.
B-10 (BST matrix, p. 75	**-Delete Measure** Dollar value of most of volume for this measure is very small. This measurement evaluates all disputes equally, regardless of the value. BellSouth is willing to consider another dispute timeliness metric.		**CLECs DISAGREE.** Dollar value is not the issue but the measure of BST's responsiveness to requirement of 45 day response to BAR – regardless of dollar value of claims. Many CLECs file large claims for adjustment and do not want to lose a metric that provides an incentive to move those claims to quicker resolution. Of course, CLECs would be open to discussing improvements in the metric and promote prompt resolution of both large and small claims. CLECs also have a concern that BST is claiming it's measuring on a line-item basis but the denominator counts appear too small to be done on a line item basis consistently. CLECs had expected the denominator would be the number of claims filed and not the line items on those claims.
B-11: Billing Completion Notice Timeliness (CLEC response Appendix A, p. 1-2)		**-New Measure** Measures the percent of completed orders for which BellSouth sent a timely billing completion notice to the CLEC. Add to SEEM Tier 1 and Tier 2.	

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Operator Services/Directory Assistance			
OS-1 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
OS-2 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
DA-1 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
DA-2 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
D-1 (BST matrix, p. 75)	-Delete Measure Process is essentially Parity by Design.		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
D-2 (BST matrix, p. 76)	-Delete Measure Accuracy of databases is also being assessed by the mechanized service order accuracy measurement.		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
D-3 (BST matrix, p. 76)	-Delete Measure Not a key measurement and BellSouth's performance has been excellent. If problems loading NXX and LRNs, problems would affect the M&R measurements.		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
E-911			
E-1 (BST matrix, p. 76)	-Delete Measure Measure is Parity by Design		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			CLECS and the FPSC to monitor BellSouth's performance.
E-2 (BST matrix, p. 76)	**-Delete Measure** Measure is Parity by Design		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
E-3 (BST matrix, p. 76)	**-Delete Measure** Measure is Parity by Design		CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance.
Trunk Group Performance			
TGP-1 (BST matrix, p. 76-78) (CLEC Response, Appendix B)	**-Title:** Modified title to combine TGP-1 (aggregate) and TGP-2 (CLEC Specific). **-Definition:** Wording clarifications. **-Exclusions:** Wording clarifications: **-Business Rules:** Wording clarifications. **-Report Structure:** Add CLEC specific report. **-Disagg:** Add CLEC specific. **-Standard:** wording clarifications. **-SEEM:** Added to Tier 1	**Business Rules:** Add phrase to notification process that states, BellSouth should notify the CLEC's traffic planning group or representatives via email when such blocking meets this exclusion criteria...	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section. **Definition: CLECs DISAGREE.** CLECs do not see where the description of how parity is compared is picked up in business rules. CLECs want language describing the hour by hour comparison in the metric. **Exclusions: CLECs AGREE.** CLECs accept the moving of the definition of "unanticipated significant traffic" and wording change for another exclusion. **Business Rules: CLECs AGREE.** CLECs do not oppose the deleted language but desire a clarification of how the metric compares blocking hours. **Calculation: No Changes** **Report Structure: CLECs AGREE.** CLECs agree to combine with each result reported separately, CLEC aggregate, CLEC specific, BST blocking. **Disagg: CLECs DISAGREE.** CLEC-aggregate and CLEC–specific results should be reported separately, once with and once without CLEC-caused exclusions. BST needs to explain "where applicable" language before CLECs can agree.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			Standard: CLECs AGREE. SEEM: CLECs AGREE.
TGP-2 (BST matrix, p. 78) (CLEC Response, Appendix B)	-Delete Measure Combined into TGP-1		CLECs AGREE. As long as existing notification language on CLEC-caused blocking gets added to TGP-1.
Collocation			
C-1 (BST matrix, p. 78-79)	-Title:Modified title -Definition:Wording clarifications. -Exclusions: No changes. -Business Rules:Wording clarifications. -Calculation: No changes -Report Structure: Wording clarifications. -Disagg:Wording clarifications. -Standard: No changes. -SEEM:No changes.		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. CLECs agree with the caveat that the method of measurement must be detailed (i.e., "average", "calendar days") in other sections. Exclusions: No Changes Business Rules: CLECs AGREE. Calculation: No Changes Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
C-2 (BST matrix, p. 79-80)	-Title: Modified title -Definition: Wording clarifications -Exclusions: Add exclusion for any bona fide firm order with a CLEC negotiated interval longer than the benchmark interval. -Business Rules: 1) Wording clarifications; 2) Delete sentence referring to cable assignments. -Calculations: No changes. -Report Structure: Wording clarification.		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section. Definition: CLECs DISAGREE. Retain original definition. BST's clarifications make definition to vague. Exclusions: CLECs AGREE. Business Rules: CLECs AGREE. Calculation: No Changes Report Structure: CLECs AGREE. Disagg: CLECs AGREE.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Disagg: Revise to conform to FPSC collocation order. -Standard: See disagg. changes. -SEEM: No changes.		Standard: CLECs AGREE. SEEM: No Changes
C-3 (BST matrix, p. 80-81)	-Title: Modified title. -Definition: Wording clarifications. -Exclusions: No changes. -Business Rules: Wording clarification. -Calculation: Wording clarification. -Report Structure: Wording clarification. -Disagg: Wording clarification. -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: No Changes Business Rules: CLECs DISAGREE. Retain last sentence "The arrangement is considered a missed due date…" because it defines "due date." Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
Change Management			
CM-1 (BST matrix, p. 81-82)	-Title: Modified title . -Definition: Wording clarification (added definition of CCP) -Exclusions: Wording clarification -Business Rules: Wording clarification. -Calculation: No changes -Report Structure: No changes. -Disagg: Wording clarification. -Standard: No changes. -SEEM: No changes.		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. Business Rules: CLECs DISAGREE. We need to keep the original business rules. We agree with the interval start and stop but retain the original business rules. Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: CLECs AGREE. SEEM: CLECs AGREE.
CM-2	-Delete Measure		

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p. 82)	-CM-2 is not needed because it only measures those notices missed in the CM-1 measurement.		**CLECs AGREE.**
CM-3 (BST matrix, p. 82-83)	**-Title:** Modified title. **-Definition:** Wording clarification (add definition of CCP). **-Exclusions:** Wording clarification **-Business Rules:** Wording clarification **-Calculation:** Wording clarification **-Report Structure:** No changes **-Disagg:** Wording clarification **-Standard:** No changes. **-SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs AGREE.** **Exclusions: CLECs DISAGREE.** BST's changes make exclusions even vaguer thereby leaving the exclusions open to abuse. They take away specific exclusions which should be retained. **Business Rules: CLECs AGREE.** **Calculation: CLECs AGREE.** **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE.** **Standard: CLECs AGREE.** **SEEM: CLECs AGREE.**
CM-4 (BST matrix, p. 83)	**-Delete Measure** --CM-4 is not needed because it only measures those notices missed in the CM-3 measurement.		**CLECs AGREE.**
CM-5 (BST matrix, p. 83)	**-Title:** Modified title. **-Definition:** Wording clarification. **-Exclusions:** No changes. **-Business Rules:** Wording clarification. **-Calculation:** No changes. **-Report Structure:** No changes. **-Disagg:** No changes. **-Standard:** No changes. **-SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs AGREE.** **Exclusions: No Changes** **Business Rules: CLECs AGREE.** **Calculation: No Changes** **Report Structure: No Changes** **Disagg: No Changes** CLEC Note: The list of systems in the disaggregation portion of this measure (notification of outages) should match the systems in the CCP document. See below for CCP list. From CCP Document: A Type 1 System Outage is a condition where the CLEC Pre-orders / Orders /

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			Queries / Maintenance Requests cannot be submitted or will not be accepted by BellSouth. **Interfaces or Gateways** LENS - Local Exchange Navigation System EDI - Electronic Data Interchange TAG - Telecommunications Access Gateway TAFI - Trouble Administration Facilitation Interface EC-TA - Electronic Communications Trouble Administration Local CSOTS - CLEC Service Order Tracking System **CCP Legacy Systems** SOCS – Service Order Communications System LMOS – Loop Maintenance Operations System RSAG – Regional Street Address Guide ATLAS – Application for Telephone Number Load Administration & Selection LFACS – Loop Facilities Assignment & Control System CRIS – Customer Records Information System CABS – Carrier Access Billing System IBS – Integrated Billing Solutions WFA – Work Force Administration **Linkages** LEO – Local Exchange Ordering LESOG – Local Exchange Service Order Generator LNP Gateway – Local Number Portability Gateway LAUTO – Local Number Portability Automation SGG – ServiceGate Gateway SOG – Service Order Generator DOM – Delivery Order Manager **Standard: No Changes** **SEEM: No Changes**

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
CM-6 (BST matrix, p. 83-84)	-**Title:** Modified title. -**Definition:** Wording clarification. -**Exclusions:** No changes. -**Business Rules:** Wording clarifications. -**Calculation:** Wording clarifications. -**Report Structure:** Report scope changed to region. -**Disagg:** Wording clarification. -**Standard:** No changes. -**SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs AGREE.** **Exclusions: No Changes** **Business Rules: CLECs DISAGREE.** Levels of severity are included except for severity 1. It should be included based on the way the CCP is established. **Calculation: CLECs DISAGREE.** Clarify the number of days to correct the problem. Critical to include in the calculation. **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE.** **Standard: No Changes** **SEEM: No Changes**
CM-7 (BST matrix, p. 84-85)	-**Title:** Modified title. -**Definition:** Wording clarification. -**Exclusions:** Wording clarification. -**Business Rules:** Wording clarification. -**Calculation:** Wording clarification. -**Report Structure:** Report scope changed to region. -**Disagg:** Wording clarification. -**Standard:** No changes. -**SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs AGREE.** **Exclusions: CLECs AGREE.** **Business Rules: CLECs AGREE.** **Calculation: CLECs DISAGREE.** The calculation in the denominator is being changed to "responded to" from "submitted." This changes the possible number of entries for the denominator. **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE.** **Standard: No Changes** **SEEM: No Changes**

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
CM-8 (BST matrix, p. 85-86)	-**Title:** Modified title. -**Definition:** Wording clarification. -**Exclusions:** Wording clarification. -**Business Rules:** Wording clarification. -**Calculation:** Wording clarification. -**Report Structure:** Report scope changed to region. -**Disagg:** Wording clarification. -**Standard:** No changes. -**SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs AGREE.** **Exclusions: CLECs AGREE.** **Business Rules: CLECs AGREE.** **Calculation: CLECs AGREE.** **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE.** **Standard: No Changes** **SEEM: No Changes**
CM-9 (BST matrix, p. 86-87)	-**Title:** Modified title. -**Definition:** Wording changes to correct a mistake in labeling the severity defects. -**Exclusions:** No changes. -**Business Rules:** 1) Wording changes to correct severity level numbers; 2) Wording clarification of the CCP. -**Calculation:** Wording changes to correct severity level numbers. -**Report Structure:** 1) Wording clarifications to correct severity level numbers ; 2) Report scope changed to region. -**Disagg:** Wording clarifications to correct severity level numbers. -**Standard:** No changes. -**SEEM:** No changes.		**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs DISAGREE.** See note below. **Exclusions: CLECs DISAGREE.** See note below. **Business Rules: CLECs DISAGREE.** See note below. **Calculation: CLECs DISAGREE.** See note below. **Report Structure: CLECs DISAGREE.** See note below. **Disagg: CLECs DISAGREE.** See note below. **Standard: No Changes** **SEEM: No Changes** **CLEC NOTE: CLECs DISAGREE.** The purpose of this measure is to determine defects in production releases. Excluding Severity level 1 defects from this measure impacts the validity of the overall measures. BST is attempting to have these Severity 1 'production' outages 'captured' in CM-5. Where this might be appropriate to complete the overall measure of outages, it also must be included in this measure to provide a truer picture of defects during productions. This data should be a part of both

Measure/ Reference	BellSouth Proposed SQM Chan (7/28/04)		CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
				measures for accurate representation of the metrics.
CM-10 (BST matrix, p. 87)	-**Title:** Modified title. -**Definition:** Wording clarification. -**Exclusions:** No changes. -**Business Rules:** No changes. -**Calculation:** No changes. -**Report Structure:** Report scope changed to region. -**Disagg:** Wording clarification. -**Standard:** No changes. -**SEEM:** No changes.			**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs AGREE.** **Exclusions: No Changes** **Business Rules: No Changes** **Calculation: No Changes** **Report Structure: CLECs AGREE.** **Disagg: CLECs AGREE.** **Standard: No Changes** **SEEM: No Changes**
CM-11 (BST matrix, p. 88-89) (CLEC Response, Appendix B)	-**Title:** Modified title. -**Definition:** Wording clarification. -**Exclusions:** No changes. -**Business Rules:** No changes. -**Calculation:** No changes. -**Report Structure:** Report scope changed to region. -**Disagg:** Wording clarification. -**Standard:** No changes. -**SEEM:** No changes.		Title: Modified Title (Delete within 60 weeks of prioritization and replace with "specified interval") Exclusions: Delete 60 weeks and replace with specified interval. Business Rules: Add language stating that BellSouth will implement software related changes within 60 weeks and process related changes within 60 calendar days. Calculation: Delete 60 weeks/days from calculation	**Title: CLECs DISAGREE.** See CLEC comment under SQM-All Measures section **Definition: CLECs AGREE.** **Exclusions: CLECs DISAGREE.** See CLEC proposal. **Business Rules: No Changes CLECs DISAGREE.** See CLEC proposal. **Calculation: CLECs DISAGREE.** CLECs need clarification on "most recent" vs. "first" release prioritization. BST appears to be substantially altering the calculations. This warrants further discussion at the workshop. **Report Structure: CLECs AGREE.** **Disagg: CLECs DISAGREE.** Disaggregation appears to be inconsistent with report structure. **Standard: No Changes** **SEEM: No Changes**
Appendix A	**Delete Appendix A**			**CLECs DISAGREE.** CLECs propose that BST add the standard reporting levels with definition

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p. 89)	-Reporting Scope		example: Region State
Appendix B (BST matrix, p. 89)	**Title:** Change from Appendix B to A -Updates and corrections		**CLECs DISAGREE.** CLECs propose that BST SEEM SME and CLECs' representative review each definition and provide joint recommendation on changes during review period. In addition, CLECs propose to define test orders as those orders that do not involve "live" customers.
Appendix C (BST matrix, p. 90-91)	**Title:** Change from Appendix C to Appendix B. **C-1:** -Delete info regarding BellSouth's internal audit policy. **C-2:** 1) Wording clarifications; 2) Insert language that states it is not necessary for BellSouth to undergo an audit of the SQM for every CLEC with which it has a contract; 3) Remove reference to undergo an audit each year for the next five years and replace with every other year for the next five years; 4) Remove reference to third party auditor being jointly selected by BellSouth and the CLEC. 5) Insert language that states, "the costs shall be borne 50% by BellSouth and 50% by the CLEC...If no party is sharing the costs of this audit, BellSouth may utilize its internal auditing organization; 6) Revise language to state that independent third party auditor shall be selected by BellSouth, with input from PSC, and other parties bearing the cost of the audit. 7) Delete referenced to BellSouth, PSC, and CLECs jointly determining scope of audit and add language that states, "Due to the regional nature of the processes used to generate performance metric data, BellSouth will agree to no more than one regional third party audit within its region per year. 8) Remove the word SEEM from paragraph noting the intention of the audits.		**Title: CLECs DISAGREE.** Keep as Appendix C. Also, see CLEC comment under SQM-All Measures section **C-1: CLECs DISAGREE.** BST attempts to change the audit structure to audit the PMQAP as the external audit. CLECs agree to include the PMQAP in an external audit in addition to BST's own internal auditing process. It is important for the Commission and CLECs to know what internal process or audit are in place to monitor BST's adherence to proprietary processes. **C-2:** 1) **CLECs DISAGREE.** BST's contractual obligations are between BellSouth and CLEC, therefore, not subject to change. 2) **CLECs DISAGREE.** What BST agreed to in a contract with a CLEC is not a part of this BellSouth Audit policy. As BST undertook a separate agreement with the CLEC(s) in question and should comply with the IA unless both parties agree to amend that IA for removal. 3) **CLECs DISAGREE.** While CLECs may agree to an audit every other year. CLECs do not agree to change the external 'comprehensive audit at the aggregate level reports' to the PMQAP. 4) **CLECs DISAGREE.** An external audit or

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Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			internal audit conducted by a third party should include a process for vendor selection to include the sponsors of the audit, i.e., BST, PSC, and CLECs regardless of who bears the cost of the audit. **5) CLECs DISAGREE.** BellSouth self –auditing will result in a prejudiced result. **6) CLECs DISAGREE.** An external audit or internal audit conducted by a third party should include a process for vendor selection to include the sponsors of the audit, i.e., BST, PSC, and CLECs regardless of who bears the cost of the audit. **7) CLECs DISAGREE IN PART.** CLECs do not disagree that a regional audit may be appropriate but language should be included that addresses the state differences between ordered PSC measures and the coordination of multiple PSC involved in the audit process. **8) CLECS DISAGREE.** See CLEC position on SEEM.
Appendix D (BST matrix, p. 91	**-Title:** Change from Appendix D to Appendix C -Update interface tables -Remove OSS-1 and OSS-4 from Appendix—propose to delete measures.		**CLECs DISAGREE.** This should remain the same with the exception of those systems interfaces added to the tables, i.e. TAG-XML, SGG.
New Appendix (BST matrix, p. 92)	**-New Appendix D to add new Reposting Policy.**		**CLECS AGREE.**
New Appendix (BST matrix, p. 92)	**-New Appendix E to add Description of Raw Data and other Supporting Data Files.**		**CLECS DISAGREE. BST is making significant changes affecting CLECs' access to Raw Data and the usability of that data. In addition, it appears that BST is removing their obligation to provide certain raw data files (i.e., Pre-Ordering, Collocation, Database Updates…) that they are currently providing. These changes are not consistent with the current SDUM and require further discussion between BST and the CLEC Coalition.**

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Flow Through Matrix (BST matrix, p. 93)	-Remove Flow Through Matrix from SQM and make available through BellSouth website.		**CLECs AGREE.**
Performance Improvement Plan and Resolution Process			
Performance Plans to improve wholesale performance (CLEC Response, p. 6-7).		Develop a process where performance that may be in parity, but of poor quality can be brought to BellSouth's attention with a request that such performance be improved.	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail on this 27th day of August 2004 to:

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