

ORIGINAL

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Sent: Friday, August 27, 2004 3:19 PM
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Subject: Florida Docket No. 000121A-TP
Importance: High

- A. **Debbie Smith**
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- B. Docket No. 000121A-TP: In Re: Investigation into the establishment of operations support systems permanent incumbent local exchange Telecommunications companies
- C. BellSouth Telecommunications, Inc.
 on behalf of Robert A. Culpepper
- D. 37 pages total
- E. BellSouth's Responses to the SQM proposed changes template (as directed by the Commission Staff)

<<BellSouth's Resp to SQM Proposed Changes Template>>

- MP _____
- OM) _____
- TR _____
- CR _____
- GCL _____
- DPC _____
- MMS _____
- RCA _____
- SCR _____
- SEC I _____
- OTH _____

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FPSC-COMMISSION CLFRK

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August 27, 2004

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
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Re: **Docket No. 000121A-TP**
**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

As directed by the Commission Staff, please find BellSouth's responses to the SQM proposed changes template, which we ask that you file in the captioned docket. A copy of the same is being provided to all parties as reflected in the attached certificate of service.

Sincerely,



Robert A. Culpepper

Enclosures

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

**CERTIFICATE OF SERVICE
Docket No. 000121A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 27th day of August, 2004 to the following:

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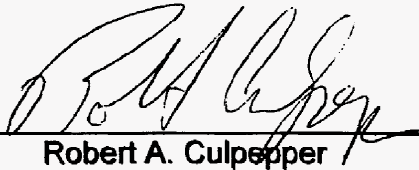
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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

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.		
Report Publication Dates (BST Matrix p. 2)	1) Clarify existing process 2) Remove SEEM requirements 3) Reference SEEM Admin Plan		
Report Delivery Methods (BST Matrix p. 2)	Updated and word clarification.		
SQM – ALL Measures			
SQM Disagg. (BST Matrix p. 1)	Delete line sharing in SQM/SEEM disagg.		
Data Retained (BST Matrix p. 1)	Delete Data Retained section -replace with sentence in the SQM referring to SDUM		
SEEM Disagg. (BST Matrix p. 1)	Delete entire SEEM Disagg section - replace with "note" in the introduction reference to the SEEM plan.		
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.		
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; 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.	-Disagg: Modify Appendix D to include Batch Scheduler, Exact, SGG, SOEG, LMU, and LQS as OSS Interface types.	BellSouth Response: Agree for SGG, Disagree to add Batch Scheduler, EXACT, SOEG, LMU, and LQS as OSS Interface types. The Batch Scheduler is a standalone web based tool that does not interface with any Ordering OSS systems. EXACT –System principally used for access services and no indication of any problems in that market. Even CLECs who advocated establishing access measurements, which is the overwhelming use of EXACT, did not propose a measure for this system. For UNEs the volume is very low. Less than 100 UNE orders per month access EXACT out of the approximately 1 million total Pre-Ordering / Ordering transactions.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-SEEM: No changes.		<p>LMU - LMU is a query type and not a system. These queries are measured in SGG.</p> <p>SOEG (Service Order Entry Gateway) is used to order, modify, cancel and disconnect the interstate special access wholesale DSL service sold to NSP/ISPs and create custom reports. SOEG only supports NSP/ISP customers and are not CLEC supporting.</p> <p>LQS LQS is an optional system provided to CLECs to make a non binding check of loop qualification. The principal vehicle for CLECs to qualify loops is loop makeup.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
OSS-3 (BST matrix, p. 5-8)	<p>-Title: Modified Title</p> <p>-Definition: Wording clarification.</p> <p>-Exclusions: Remove exclusion for degraded service.</p> <p>-Business Rules:</p> <p>1) Wording clarifications;</p> <p>2) Added language to define degraded service.</p> <p>-Calculation;</p> <p>1) Clarify full outage calculation;</p> <p>2) Added total outage calculation.</p> <p>-Report Structure; Wording modifications.</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<p>-Disagg: 1) Added Total Outage; 2) Modified Appendix D. -Standard: Added Total Outage as a diagnostic measure. -SEEM: No changes.</p>		<p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
OSS-4 (BST matrix, p.9)	<p>-Delete Measure. -Modified OSS-3 to monitor degraded service that would have been captured in this measure.</p>		
PO-1 (BST matrix, p.9)	<p>-Delete Measure (low volume and low impact).</p>		
PO-2 (BST matrix, p. 9-11)	<p>-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.</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
Bulk Migration Response Time (BST matrix, p.11-12)			
O-1 (BST matrix, p.13)	<p>-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.</p>		
O-2 (BST matrix, p.13-14)	<p>-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.</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<p>-Disagg: Combined interfaces types (EDI and TAG). -Standard: Revised benchmark from 99.9% to 99.5% -SEEM: Remove from Tier 1.</p>		<p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
<p>O-3 (BST matrix, p.14-17) (CLEC Response, Appendix B)</p>	<p>-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.</p>	<p>-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.</p>	<p><u>BellSouth Response:</u></p> <p>Disaggregation: Disagree. UNE-Loop and UNE-Loop with LNP and LNP are more complex orders, and the proposed 95% benchmark is too high for these types of orders. In BellSouth's SQM proposal, the three primary disaggregations for this measure are UNE, Resale, and LNP. The disaggregations the CLECs are proposing are currently accounted for in the UNE disaggregation, with UNE-L included in UNE and LNP in LNP. Consistent with BellSouth's methodology, it is not feasible to break out every product due to the voluminous amount and report on it. This is especially true when that product has a 'low volume', as in this case. The information for all products is available to CLECs via LSR Detail Report.</p> <p>Standard: Disagree For this measurement, the CLECs propose that the benchmark for UNE-L at 95%, LNP at 95% and add UNE-L with LNP with a benchmark of 95%. These benchmarks are inappropriately high. First, the FCC has found that BellSouth's OSS systems are currently capable of flowing through UNE orders in a manner that allows competitive carriers a meaningful opportunity to compete, at the current benchmarks for flow through. Second, CLECs provided no rationale for making the benchmarks more stringent.</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<p>Third, there has been no indication that there is some unique problem with flow through for UNE-L with LNP orders, so there is no demonstrated reason to treat UNE-P different from other UNEs.</p> <p>Finally, the impact of flow through has declined significantly over the last few years. The impact on a CLEC when an order that was supposed to flow through does not is that the order becomes partial mechanized and the return of the FOC takes longer. When flow through measures were established, the objective time interval for returning a partial mechanized FOC was hours longer than the fully mechanized objective. With our proposal, that difference has been reduced to hours.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
O-4 (BST matrix, p. 17)	<p>-Delete Measure. -Data will be captured in proposed modifications to O-3.</p>		
Flow-Through Error Analysis (BST matrix, p. 17)	<p>-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.</p>		
O-6 (BST matrix, p. 17)	<p>-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</p>		

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
O-7 (BST matrix, p. 17) (CLEC Response, Appendix B)	<p>how to obtain CLEC LSR info.</p> <p>-Delete Measure. -Info can be ascertained by reviewing data from Reject Interval.</p>	<p>Exclusions: Modify project exclusion so batch hot cuts will not be excluded.</p>	<p>BellSouth Response: Disagree with retaining this measure at all as stated in our proposal. This measure only provides a view of the percentage of CLEC requests that were rejected and can be ascertained by reviewing data from O-8. This does not measure BellSouth errors and therefore it is not a parity measure.</p> <p>BellSouth agrees with the general request of reflecting batch hot cut LSRs in the ordering measures where applicable and we have proposed to do so.</p>
O-8 (BST matrix, p. 18-22) (CLEC Response, Appendix B)	<p>-Title: Modified title. -Definition: Wording clarification -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</p>	<p>Exclusions: Modify project exclusion so batch hot cuts will not be excluded.</p>	<p>BellSouth Response: Exclusions: Agree. BellSouth's proposed modification to the existing exclusion for projects addresses the CLEC's request.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
O-9 (BST matrix, p. 22-28) (CLEC Response, Appendix B)	<p>-Title: Modified title.</p> <p>-Definition: Wording clarifications</p> <p>-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.</p> <p>-Business Rules:</p> <p>1) Wording Clarifications;</p> <p>2) Provided web address for hours of operations;</p> <p>3) Added note to reflect the Bulk Migration process.</p> <p>-Calculation: Delete of Average FOC Interval calculation, not used to state performance.</p> <p>-Report Structure: Delete interval buckets---can be obtained from raw data</p> <p>-Disagg: Delete product disagg.---little to no volume for many products. Product level can be obtained from raw data.</p> <p>-Standard:</p> <p>1) Revise Partially Mech benchmark from 95%<=10 hours to 90%<=10 hours;</p> <p>2) Revise Non-Mech benchmark from 95%<=24 hours to 90%<=24 hours;</p> <p>3) Revise LIT from 95 %<=48 hours to 95 %<=10 days.</p> <p>-Benchmarks revised in attempt to regionalize benchmarks for all BST states.</p> <p>-SEEM: Remove from Tier 1 and Tier 2.</p>	<p>Exclusions: Modify project exclusion so that LNP (standalone) and batch hot cuts will not be excluded.</p> <p>Disagg: Add LNP Standalone (Projects) as a level of disagg.</p> <p>Standard: Add benchmarks for LNP Standalone (Projects)-95% within 24 hours (1-10 numbers), 95% within 48 hours (11-999 numbers).</p> <p>SEEM: Include new LNP Standalone disagg. in SEEM Tier 1 and Tier 2.</p>	<p>BellSouth Response:</p> <p>Exclusions: Agree with modifying exclusion for projects to include those that are identified as bulk migrations but disagree with inclusion of LNP standalone (Projects) which are handled by project managers. To illustrate the extensive work involved in managing a project, here is an example of the types of project management activities involved in the processing of these types of orders. First, the service representative must issue orders and place these orders in "Held Negotiation" status. The service representative then sends an e-mail notification to the project management group. This group of project managers has a 24-hour period in which to contact the service representative and verify the order information. The project manager must validate the Project Identification Number or PRN. In most cases, the project manager must contact the CLEC for additional information. If the project involves porting numbers after normal business hours, or a large number of lines, for an end-user such as a hospital, the project manager will have to form and facilitate an interdepartmental coordination meeting to ensure that BellSouth can handle the request. Next the project manager must establish a provisioning schedule with input from this team and provide that schedule to the CLECs and Account Team. At this point, the service representative will update the orders, ensure the project number is populated, and appointment codes are populated before releasing the orders. All of these events occur before the firm order confirmation is returned. This work, performed in a diligent manner, requires time not accounted for in the benchmarks established for the vast majority of LSRs that are processed during the course of normal operations.</p> <p>Projects for LNP standalone are exactly the type of valid projects that are managed by a project manager, have wide variability in response interval by design, and as a result, should not be</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<p>subject to the same standard interval process and should continue to be excluded from the FOC measurement.</p> <p>Disaggregation: Disagree that any product disaggregation is needed for this measure as stated in our proposal. Also, since LNP projects should be excluded, this disaggregation is unnecessary.</p> <p>Standard: Disagree that any product disaggregation is needed for this measure as stated in our proposal. Also, since LNP projects should be excluded, this disaggregation is unnecessary. Requiring a standard interval, when the wide variety of activities that do not fit standards, due to the variable nature of project orders, (which is why they are designated as projects), makes it unreasonable to establish a specific performance standard.</p> <p>SEEM: Disagree per our proposal for SEEM.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
O-10 (BST matrix, p. 29)	<p>-Delete Measure.</p> <p>-This measure captures an extremely small number of orders and the</p>		

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
O-11 (BST matrix, p. 29-31) (CLEC Response, Appendix B)	<p>interval for this measure is captured in O-9.</p> <p>-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.</p>	<p>Exclusions: Modify project exclusion so batch hot cuts will not be excluded.</p>	<p>BellSouth Response: Exclusions: Agree. BellSouth's proposed modification to the existing exclusion for projects addresses the CLEC's request.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
O-12 (BST matrix, p. 32)	<p>-Delete Measure -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.</p>		
P-11 (BST matrix, p. 32-35)	<p>-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. 3) <u>Add exclusion for Listing Orders</u> -Business Rules: Wording clarifications. -Calculation: Wording Clarification -Disagg: No changes -Standard: No changes -SEEM: No changes</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p>

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.		
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.		
P-2B (BST matrix, p. 37)	-Delete Measure -Minimal impact on CLECs		
P-3 (BST matrix, p.37-40)	-Title: Modified title (from % missed to % met) -Definition: Changed to reflect percent of installation appointments met. -Exclusions: Removed Exclusion for End User Misses <u>Add exclusion for Listing Orders</u> -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.		Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
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.		
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.	BellSouth Response: The CLECs provide no reason for adding this disaggregation for batch hot cuts nor do they provide the rationale for this proposed standard. Disaggregation: Disagree BellSouth proposed to replace this measure with the new measure FOCI. With respect to FOCI, this disaggregation is unnecessary because Hot

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<p>Cuts are already reported in their own measures and measured for the interval required to work the actual cut; For the functions captured by this measure, it is not significant whether the order involves a hot cut or not, as it will be simply another order for a UNE Loop, receiving no different treatment than other UNE orders.</p> <p>Standard: Disagree The meaningful and critical aspects of the Hot Cut processes are measured in the P-7 series of measures. Since due dates for batch hot cuts are negotiated between BellSouth and the CLECs, the average interval will simply reflect the results of that negotiation and will not be an indicator of performance.</p>
P-5 (BST matrix, p. 45)	<p>-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.</p>		
P-6 (BST matrix, p. 45)	<p>-Delete Measure -Another measure of FOC Timeliness which is already measured in FOCT and proposed FOCL.</p>		
P-7 (BST matrix, p. 45-47) (CLEC Response, Appendix B)	<p>-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.</p>	<p>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 (CLEC comments p. 5) Standard: Revise benchmark of 95% <=15 minutes to 95 %< =10 minutes.</p>	<p>BellSouth Response: Agree with measuring non-coordinated cuts, but disagree with doing so in this measure. The measure requires a specific start and stop time, which is only available with coordinated conversions, so the purpose of this metric is to measure Coordinated Customer Conversion Intervals where the CLEC requests that BellSouth provide a coordinated conversion. CLECs do not receive specific start time commitments for non-coordinated orders; instead they are committed to a due date only. As a result, non coordinated conversion do not have tracked start and stop times. . BellSouth has proposed a measure in FL to track non coordinated conversions which would reflect Bellsouth meeting the due date for non coordinated conversions. This approach is consistent with the service provided. Title: Disagree to include Non-Coordinated</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-SEEM: No changes.		<p>Conversions in this measure. (See above)</p> <p>Business Rules: Agree. BellSouth wording clarification in definition and business rules includes time to notify CLEC that the cut is complete.</p> <p>Calculation: Disagree (See above)</p> <p>Disaggregation: Disagree</p> <p>Standard: Disagree. Current benchmark does not account for the CLEC notification time. Adding 5 minutes to the benchmarks is reasonable to account for the time to notify the CLEC. No indication that current benchmark is too low and CLECs provided no rationale for making the benchmark more stringent.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
P-7A (BST matrix, p.47-50) (CLEC Response p. 5 and Appendix B)	<p>-Title: Delete reference to average interval in title. Average interval not used to evaluate performance.</p> <p>-Definition: Wording clarification.</p> <p>-Exclusions:</p> <p>1) Remove exclusion for test orders;</p> <p>2) Add exclusion for BellSouth or CLEC internal or administrative orders;</p>	<p>Disagg: Add additional migration types</p>	<p><u>BellSouth Response:</u></p> <p>Disaggregation: Disagree</p> <p>Title:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<p>3) Add exclusion for listing orders.</p> <p>-Business Rules: Modified to identify intervals for IDLC and non-IDLC loops</p> <p>-Calculation: Delete calculations for interval and average interval, not used to evaluate performance.</p> <p>-Report Structure:</p> <p>1) Remove requirement to report results in three separate distributions;</p> <p>2) Delete regional report;</p> <p>3) Delete unnecessary interval buckets.</p> <p>-Disagg: 1) Delete SL1 and SL2 time and non-time specific.</p> <p>2) New disagg of Non-IDLC and IDLC.</p> <p>-Standard: Benchmark for IDLC 95% within + or -2 hours of scheduled start time.</p> <p>-SEEM: No changes.</p>		<p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
<p>P-7B (BST matrix, p. 50-51) (CLEC Response p. 5 and Appendix B)</p>	<p>-Title: Modified Title</p> <p>-Definition: Wording clarification (simplified)</p> <p>-Exclusions:</p> <p>1) Wording Clarification;</p> <p>2) Remove exclusion for test orders;</p> <p>3) Add exclusion for BellSouth or CLEC internal or administrative orders;</p> <p>4) Add exclusion for listing orders.</p> <p>-Business Rules:</p> <p>1) Wording clarification;</p> <p>2) Add language to capture the overall percentage of orders.</p> <p>-Calculation:</p> <p>1) Wording clarification;</p> <p>2) Add calculation for overall percentage.</p> <p>-Report Structure: Delete regional report.</p> <p>-Disagg: Roll-up INP and LNP loops to CCC (loops).</p> <p>-Standard: Remove benchmark of <=5 hours and make diagnostic for CCC (loops).</p> <p>-SEEM: No changes.</p>	<p>-Title: Include Non-Coordinated Customer Conversions in this measure.</p> <p>-Definition: Include Non-Coordinated Customer Conversions.</p> <p>-Exclusions: Add exclusion for test orders.</p> <p>-Business Rules: Include Non-Coordinated Customer Conversions.</p> <p>Disagg: Add additional migration types –</p> <p>Standard: Revise benchmark of <= 5 hours to <= 2 hours.</p> <p>-SEEM: Add to SEEM Tier 1 and Tier 2.</p>	<p><u>BellSouth Response:</u></p> <p>See response for P-7. Non-coordinated conversions do not have tracked start and stop times. They are committed to a due date only. BellSouth has proposed a new measure in its FL SQM proposal, Non-Coordinated Customer Conversions – Percent Completed and Notified on Due Date (CNDD), to track non coordinated conversions which would reflect Bellsouth meeting the due date for non coordinated conversions. Due to system limitations there are no other ways to track non-coordinated. Also, the CLECs are proposing to get the "same" service as coordination, without paying for it.</p> <p>Title: Disagree (see above)</p> <p>Definition: Disagree (see above)</p> <p>Exclusions: Disagree. Test type orders do not affect performance on coordinated hot cuts provided to CLECs.</p> <p>Business Rules: Disagree (see above)</p> <p>Disaggregation: Disagree (see above)</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<p>Standard: Disagree. History has shown that long intervals on this measure do not necessarily indicate a performance problem because the number of such troubles is so small. In the rare cases when a trouble occurs, it is a very unusual case they may be very complicated to solve so a meaningful benchmark interval can't be established.</p> <p>SEEM: Disagree. With the actual number of troubles being so small, proposing to add this measure to SEEM, due to the few complicated troubles, which are the exceptions, is nothing more than blatant greed.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
P-7C (BST matrix, p. 52-53) (CLEC Response p. 5 and Appendix B)	<p>-Title: Changed from 7 days to 5 days.</p> <p>-Definition: Wording clarifications and change from 7 days to 5 days</p> <p>-Exclusions:</p> <ol style="list-style-type: none"> 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. <p>-Business Rules: Wording clarification and change from 7 days to 5</p>	<p>-Definition: Include Non-Coordinated Customer Conversions.</p> <p>-Exclusions: Add exclusion for test orders.</p> <p>-Business Rules: Include Non-Coordinated Customer Conversions.</p> <p>Disagg: Add additional migration types</p> <p>Calculation: Include Non-</p>	<p>BellSouth Response: Disagree (see P-7 and P-7B above)</p> <p>Definition: Disagree (see P-7 and P-7B above) Exclusions: Disagree. Test type orders do not affect performance on coordinated hot cuts provided to CLECs.</p> <p>Business Rules: Disagree (see P-7 and P-7B above)</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<p>days.</p> <p>-Calculation: Wording clarification and change from 7 days to 5 days.</p> <p>-Report Structure:</p> <p>1) Delete dispatch/non-dispatch reports</p> <p>2) Delete regional report.</p> <p>-Disagg: Roll-up UNE loops design and non-design into UNE loops.</p> <p>-Standard: Revise benchmark of <=3% to <=5%</p> <p>-SEEM: Remove from SEEM Tier 1 and Tier 2.</p>	Coordinated Customer Conversions.	<p>Calculation: Disagree (see P-7 and P-7B above)</p> <p>Disaggregation: Disagree (see P-7 and P-7B above)</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
CNDD: Non-CCC Percent Completed and Notified Due Date (BST matrix, p. 53-54)	<p>-New measure.</p> <p>Measures the percentage of non-coordinated conversions that BellSouth completed and provided notification to the CLECs on the due date.</p>		
P-7D: Coordinated/Non-coordinated Customer Conversions-Percent Without Service Disruption (CLEC Response, Appendix A, p. 5-6)		<p>-New Measure</p> <p>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>	<p><u>BellSouth Response:</u></p> <p>The measure as written does not make sense. The Definition section of this measure states the intent is to measure service interruptions outside of the initial customer cutover, yet the Business Rules describe capturing the number of service disruptions that occur during the cutover process. Disagree with monitoring this as a separate measure. Also, BellSouth proposed to report the percentage of conversions without troubles under the existing measure under existing measure P-7B for coordinated conversions. Since non-coordinated do not have specific start times, this measure does not appear to be significant for</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			non-coordinated cuts.
P-8 (BST matrix, p. 54)	<p>-Delete Measure -represents a small number of orders and the customer impacting event (trouble) is captured in Percent Provisioning Troubles.</p>		
P-9 (BST matrix, p. 54-56)	<p>-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. <u>Add exclusion for Listing Orders</u> -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</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>
P-11 (BST matrix, p. 57)	<p>Revised and moved to Ordering Section.</p>		
P-13B (BST matrix, p. 57-58)	<p>-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</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
P-13C (BST matrix, p. 58-59)	<p>-Title: Wording clarification.</p> <p>-Definition: Wording clarification.</p> <p>-Exclusions:</p> <ol style="list-style-type: none"> 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 <p>-Business Rules: Wording clarifications.</p> <p>-Calculations: Wording clarification.</p> <p>-Report Structure: Delete regional report.</p> <p>-Disagg: Remove Standalone</p> <p>-Standard: insert >= sign</p> <p>-SEEM: Remove from SEEM Tier 1</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
P-13D (BST matrix, p. 59-60)	<p>-Title: Wording clarification-measure is not an interval rather a percent within interval</p> <p>-Definition: Wording clarification.</p> <p>-Exclusions:</p> <ol style="list-style-type: none"> 1) Wording clarifications; 2) Remove exclusion for orders which are candidates for 10 digit triggers. 3) <u>Add exclusion for Listing Orders</u> <p>-Business Rules: Wording clarifications.</p> <p>-Calculations:</p> <ol style="list-style-type: none"> 1) Revise calculation to be based on number of non-triggerable orders. 2) Delete interval calculation, performance is based on percentage. <p>-Report Structure: Delete regional report.</p> <p>-Disagg: Roll-up LNP Working Hours and LNP Unscheduled After hours into LNP.</p> <p>-Standard: Revise benchmark from 95% <= 4 hours to 95% <= 12 hours.</p> <p>-SEEM: Remove from SEEM Tier 1</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
P-14 Percent of Customer Trouble Tickets Closed Electronically (CLEC Response, Appendix A, p. 3-4)		<p>-New Measure Measures the percent of customer trouble tickets during the reporting period that are closed electronically by a BellSouth technician.</p>	<p><u>BellSouth Response:</u> Disagree First the CLECs have provided no data to support that this is a problem or could substantiate the addition of this measure. Second, BellSouth has no incentive to provide a manual notification as it would consume additional BellSouth personnel time as well. Lastly, the CLECs have not</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<p>indicated what the impact to the end-user customer is, especially since BellSouth has fixed the trouble.</p> <p>For this proposed measure, Percent of Customer Trouble tickets Closed Electronically, it is BellSouth's standard procedure to close all tickets that are reported through our electronically bonded system, with an electronic notification. Tickets that are initiated with a CLEC phone call are subsequently closed by a phone call.</p>
<p>P-14 Percent of Batch Hot Cuts Started On Time (CLEC Response, Appendix A pps. 7-8)</p>		<p>-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.</p>	<p><u>BellSouth Response:</u> Disagree with adding this measure. Performance on Batch Hot Cuts, if coordinated, would be captured in P-7 (CCCI: Coordinated Customer Conversions Interval – Hot Cut Duration) and P-7A (HCT: Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval). Batch hot cuts that are not coordinated would be captured in the measure proposed by BellSouth, CNDD: Non-Coordinated Customer Conversions – Percent Completed and Notified on due Date.</p>
Maintenance and Repair			
<p>M&R-1 (BST matrix, p. 61-62)</p>	<p>-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</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>
<p>M&R-2 (BST matrix, p. 62-64)</p>	<p>-Title: Modify title. -Definition: Wording clarification.</p>		<p>Title:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<p>-Exclusions: 1) Add exclusion for Informational Tickets; 2) Add exclusion for Troubles Outside BellSouth's Control.</p> <p>-Business Rules: Wording clarification.</p> <p>-Calculations: Wording clarification.</p> <p>-Report Structure: Delete regional report.</p> <p>-Disagg: 1) Roll-up products with low volume into another category; 2) Modify product categories so that each category is reported only once.</p> <p>-Standard: Parity (see disagg. changes)</p> <p>-SEEM: Remove from SEEM Tier 1 and Tier 2.</p>		<p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
M&R-3 (BST matrix, p. 64-66)	<p>-Title: Wording clarification.</p> <p>-Definition: Wording clarification.</p> <p>-Exclusions: 1) Add exclusion for Informational Tickets; 2) Add exclusion for Troubles Outside BellSouth's Control.</p> <p>-Business Rules: 1) Wording clarification; 2) Add note clarifying time that has already been excluded.</p> <p>-Calculations: No changes</p> <p>-Report Structure: Delete regional report.</p> <p>-Disagg: 1) Roll-up products with low volume into another category; 2) Modify product categories so that each category is reported only once.</p> <p>-Standard: Parity. (see disagg. changes)</p> <p>-SEEM: No changes.</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
M&R-4 (BST matrix, p. 66-68)	<p>-Title: Wording clarification.</p> <p>-Definition: Wording clarification.</p> <p>-Exclusions: 1) Add exclusion for Informational Tickets; 2) Add exclusion for Troubles Outside BellSouth's Control.</p> <p>-Business Rules: Wording clarification.</p> <p>-Calculations: 1) Wording clarification to specify repeat troubles; 2) Replaced cleared date with closed date.</p> <p>-Report Structure: Delete regional report.</p> <p>-Disagg:</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	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.		Disagg: Standard: SEEM:
M&R-5 (BST matrix, p.68)	-Delete Measure Duplicative measure. Information captured in M&R-3, since maintenance durations greater than 24 hours normally involve an out service condition.		Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
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: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
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		

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
the E-Mail list, but the measurement of this process is not necessary.			
Billing			
B-1 (BST matrix, p. 70-71)	<p>-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</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>
B-2 (BST matrix, p. 71-73)	<p>-Title: Wording Clarification -Definition: Wording Clarification -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.</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>
B-3 (BST matrix, p. 73)	<p>-Delete Measure Not a key measurement since it captures the accuracy of the packs, not the content of the packs.</p>		
B-4 (BST matrix, p. 73)	<p>-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.</p>		
B-5	<p>-Title: Wording clarification.</p>	<p>Exclusion: Add exclusion for</p>	<p>BellSouth Response:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p. 73-74) (CLEC Response, Appendix B)	<p>-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.</p> <p>-Exclusions: No changes.</p> <p>-Business Rules: Wording clarification.</p> <p>-Report Structure: Wording clarification</p> <p>-Calculation: No changes.</p> <p>-Report Structure: No changes.</p> <p>-Disagg: Wording clarification</p> <p>-Standard: Wording clarification.</p> <p>-SEEM: No changes.</p>	<p>non-completed calls.</p> <p>Business Rules: Add language to make clear the type of billable usage, particularly third party, that should be covered in this metric.</p>	<p>Exclusions: Disagree.</p> <p>The purpose of ODUF and ADUF is to deliver CLEC recorded usage to the subscribing CLECs. These measures, as well as the ODUF and ADUF products, were intended to deliver and measure the delivery timeliness of all usage recorded by BellSouth for subscribing CLECs.</p> <p>Currently, BellSouth bills the CLEC for this usage (ex: operator work time, originating access). Without this usage on the DUF files, there would be gaps in the reconciliation of the UNE bill.</p> <p>Consequently, ODUF and ADUF provide all of the usage to the CLECs. To eliminate the "uncompleted or non-completed call data" from the daily files or the measurement would require BellSouth to add to our internal processing of the messages which could result in additional delay to the CLEC in receiving the messages.</p> <p>If the CLEC chose to bill an IXC consistent with the existing structure for switched access charges, the IXC would be billed for the elapsed time for an "uncompleted or non-completed call". Without the originating access record that we currently send the CLEC would not be able to bill those charges if it wanted to do so.</p> <p>Business Rules: Disagree. It is too risky and not necessary to list this specific information in the SQM. All ODUF and ADUF traffic is included in the measure so the proposed language is redundant. Also the specific record types are subject to change outside of measurement proceedings, so the SQM could not be kept up to date.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
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.	BellSouth Response: Disagree. BellSouth proposed to delete this measure per our proposal This measure is directly correlated to B-5 timeliness. B-5 measures % in 6 days and B-4 measures % in 30 days. B-6 is average days to deliver, but is not measuring anything additional that is meaningful. Exclusions: Disagree (See B-5 above) Business Rules: Disagree. (See B-5 above)
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.		
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 user.		
B-9 (BST matrix, p. 74)	-Delete Measure -Measure has had no activity in last 12 months.		
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.		
B-11: Billing Completion Notice Timeliness (CLEC response)		-New Measure Measures the percent of completed orders for which BellSouth sent a timely billing	BellSouth Response: Disagree The CLECs have not provided any rationale for creating this measure. They have simply made

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Appendix A, p. 1-2)		completion notice to the CLEC. Add to SEEM Tier 1 and Tier 2.	<p>the unsupported statement that they are not receiving timely billing completion notification. Also this measure includes the interval captured in the AOCNI measure.</p> <p>According to the 1996 Telecommunications Act, BellSouth is required to furnish service to the CLECs that is at least equal to BellSouth's. Since BellSouth, does not provide this process to its own customers, there is no 'parity requirement' to provide this to the CLECs. This is simply an attempt by the CLECs to gain superior service, at no charge, while imposing an additional expense on BellSouth. Consequently, such services should not be subjected to measures under the Act.</p> <p>Even if the measure was implemented, the CLECs do not provide rationale to support the benchmark, which is far more stringent than benchmarks that apply to this measure in other jurisdictions. First, the measurement would be more accurately captured by using business days to accommodate the present system hours of availability (SOCS, 1000-2400 Su, 0600-2400 Mo-Sat). Additionally, the other RBOCs with a similar metric range from 90% within 3 business days (Verizon - PA) to 95% within the 6th work day (SBC - IN, MI, OH, WI).</p>

Operator Services/Directory Assistance

OS-1 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		
OS-2 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		
DA-1 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		
DA-2 (BST matrix, p. 75)	-Delete Measure Measure is Parity by Design.		
D-1 (BST matrix, p. 75)	-Delete Measure Process is essentially Parity by Design.		
D-2 (BST matrix, p. 76)	-Delete Measure Accuracy of databases is also being assessed by the mechanized service order accuracy measurement.		
D-3 (BST matrix, p. 76)	-Delete Measure Not a key measurement and BellSouth's performance has been		

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	excellent. If problems loading NXX and LRNs, problems would affect the M&R measurements.		
E-911			
E-1 (BST matrix, p. 76)	-Delete Measure Measure is Parity by Design		
E-2 (BST matrix, p. 76)	-Delete Measure Measure is Parity by Design		
E-3 (BST matrix, p. 76)	-Delete Measure Measure is Parity by Design		
Trunk Group Performance			
TGP-1 (BST matrix, p. 76-78) (CLEC Response, Appendix B)	<p>-Title: Modified title to combine TGP-1 (aggregate) and TGP-2 (CLEC Specific).</p> <p>-Definition: Wording clarifications.</p> <p>-Exclusions: Wording clarifications:</p> <p>-Business Rules: Wording clarifications.</p> <p>-Report Structure: Add CLEC specific report.</p> <p><u>Delete With and Without Exclusion for Orders Delayed or Refused by CLEC</u></p> <p>-Disagg: Add CLEC specific.</p> <p>-Standard: wording clarifications.</p> <p>-SEEM: Added to Tier 1</p>	<p>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.</p>	<p>BellSouth Response:</p> <p>Business Rules: Disagree. The CLECs proposal is not a business rule, but a process change which has been mistakenly characterized as a business rule. The type of notification that is performed should be addressed in the appropriate operations forum and if such notification is insufficient, it can only be changed in a forum where the technical expertise resides to deal with such process changes, such as contract negotiation. Measurements can only measure the process as it exists and measurement proceedings should not be used as a substitute or additional avenue to force changes that should be addressed in other forums such as CCP or contract negotiation. In any event, the CLECs have not indicated that the existing business rules are insufficient to report the appropriate results regardless of the notification process that exists, so there is no need to modify them.</p> <p>More specifically, we are advised that the BellSouth Circuit Capacity Managers (CCMs) do not always have current contact information for the CLECs traffic engineer. Some of the smaller CLECs do not have a traffic engineer. The CLEC industry experiences a lot of personnel changes. For this to work properly the CLECs would need to issue timely updates via email or maintain a website with a list of current updates. This would be more costly and time consuming for the CLEC community.</p> <p>Even if this process was manageable for large</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<p>CLECs, the proposed change would discriminate against the smaller CLECs for which it would be more costly and possibly cause delays in their notification.</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
<p>TGP-2 (BST matrix, p. 78) (CLEC Response, Appendix B)</p>	<p>-Delete Measure Combined into TGP-1</p>	<p>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.</p>	<p><u>BellSouth Response:</u></p> <p>Business Rules: Disagree (see TGP-1)</p>
Collocation			
<p>C-1 (BST matrix, p. 78-79)</p>	<p>-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.</p>		<p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			Standard: SEEM:
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. -Disagg: Revise to conform to FPSC collocation order. -Standard: See disagg. changes. -SEEM: No changes.		Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
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: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
CM-1 (BST matrix, p. 81-82)	-Title: Modified title. -Definition: Wording clarification (added definition of CCP) -Exclusions: Wording clarification -Business Rules: Wording clarification.		Title: Definition:

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<ul style="list-style-type: none"> -Calculation: No changes -Report Structure: No changes. -Disagg: Wording clarification. -Standard: No changes. -SEEM: No changes. 		<ul style="list-style-type: none"> Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
CM-2 (BST matrix, p. 82)	<ul style="list-style-type: none"> -Delete Measure -CM-2 is not needed because it only measures those notices missed in the CM-1 measurement. 		
CM-3 (BST matrix, p. 82-83)	<ul style="list-style-type: none"> -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. 		<ul style="list-style-type: none"> Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:
CM-4 (BST matrix, p. 83)	<ul style="list-style-type: none"> -Delete Measure --CM-4 is not needed because it only measures those notices missed in the CM-3 measurement. 		
CM-5 (BST matrix, p. 83)	<ul style="list-style-type: none"> -Title: Modified title. -Definition: Wording clarification. -Exclusions: No changes. -Business Rules: Wording clarification. -Calculation: No changes. -Report Structure: No changes. -Disagg: No changes. 		<ul style="list-style-type: none"> Title: Definition: Exclusions: Business Rules:

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<p>-Standard: No changes. -SEEM: No changes.</p>		<p>Calculation: Report Structure: Disagg: Standard: SEEM:</p>
<p>CM-6 (BST matrix, p. 83-84)</p>	<p>-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.</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>
<p>CM-7 (BST matrix, p. 84-85)</p>	<p>-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.</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard:</p>

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)	<p>-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.</p>		<p>SEEM: Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>
CM-9 (BST matrix, p. 86-87)	<p>-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.</p>		<p>Title: Definition: Exclusions: Business Rules: Calculation: Report Structure: Disagg: Standard: SEEM:</p>
CM-10 (BST matrix, p. 87)	<p>-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.</p>		<p>Title: Definition: Exclusions: Business Rules:</p>

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-SEEM: No changes.		Calculation: Report Structure: Disagg: Standard: SEEM:
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: <u>Wording clarifications.</u> -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 days 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	BellSouth Response: Disagree This proposed change is another example of a process change that has been mistakenly characterized as a measurement change. In this case the proposal should be addressed in the CCP. The measurement proceeding should not circumvent the CCP by requiring process changes instead of measuring the processes that exist. Per the Change Control Plan (CCP) Process Changes are handled with the same prioritization and 60 week interval as the Software Changes. Both Process and Software Change Requests are in the data used to calculate current CM-11 results as per the CCP. The CCP board, made up CLECs and BellSouth would first need to change the CCP to create the 60 Day interval for Process Change Requests to make data available for the change to CM-11 that AT&T has requested. AT&T needs to take the change suggestion to the CCP meeting before trying to change the SQM. The Change Control Plan (CCP) V4.0 Introduction does not address Type 4 and Type 5 Intervals. Intervals are in Section 4.0 - Part 2. The current interval in the CCP for Type 4 and Type 5 Changes requests (software and manual process changes) is 60 weeks. Manual Process Change Requests are currently included in the data for CM-11. Changing the SQM as proposed will result in either no data being submitted or submitting data that will result in an "automatic" failure since the CCP will be performing to the 60 week interval and not 60

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			<p>days.</p> <p>Title: Disagree (see above)</p> <p>Exclusions: Disagree (see above)</p> <p>Business Rules: Disagree (see above)</p> <p>Calculation: Disagree (see above)</p> <p>Title:</p> <p>Definition:</p> <p>Exclusions:</p> <p>Business Rules:</p> <p>Calculation:</p> <p>Report Structure:</p> <p>Disagg:</p> <p>Standard:</p> <p>SEEM:</p>
Appendices			
Appendix A (BST matrix, p. 89)	Delete Appendix A -Reporting Scope		
Appendix B (BST matrix, p. 89)	Title: Change from Appendix B to A -Updates and corrections		
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		

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	<p>BellSouth and the CLEC.</p> <p>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;</p> <p>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.</p> <p>7) Delete referenced to BellSouth, PSC, and CLECs jointly determining scope of audit and adds 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.</p> <p>8) Remove the word SEEM from paragraph noting the intention of the audits.</p>		
Appendix D (BST matrix, p. 91)	<p>-Title: Change from Appendix D to Appendix C</p> <p>-Update interface tables</p> <p>-Remove OSS-1 and OSS-4 from Appendix—propose to delete measures.</p>		
New Appendix (BST matrix, p. 92)	-New Appendix D to add new Reposting Policy.		
New Appendix (BST matrix, p. 92)	-New Appendix E to add Description of Raw Data and other Supporting Data Files.		
Flow Through Matrix (BST matrix, p. 93)	-Remove Flow Through Matrix from SQM and make available through BellSouth website.		
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.	<u>BellSouth Response:</u> CLECs are already free to do this, so it is unnecessary to address it here. If a specifically defined process is desired, that should be addressed with each CLEC in their contract negotiations.