



at&t

Tracy W. Hatch
General Attorney
Legal Department

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (850) 577-5508

thatch@att.com

RECEIVED-FPSC
09 OCT 30 PM 4: 36
COMMISSION
CLERK

October 30, 2009

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

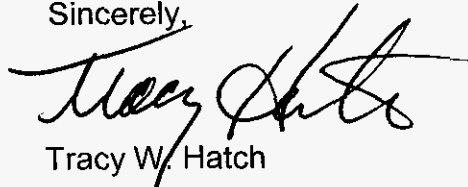
Re: **Docket No. 000121A-TP**
**In Re: Investigation into the establishment of operations support
systems permanent performance measures for incumbent local
exchange Telecommunications companies (BellSouth Track)**

Dear Ms. Cole:

Enclosed for filing in the above referenced docket is the Joint Matrix by BellSouth Telecommunications, Inc. d/b/a AT&T Florida, CompSouth and participating CLECs regarding proposed revisions to the BellSouth Performance Assessment Plan.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Tracy W. Hatch

Enclosures

cc: All parties of record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.

COM _____
ECR _____
GCL 2 _____
OPC _____
RCP _____
SSC _____
SGA _____
ADM _____
CLK _____

DOCUMENT NUMBER-DATE

11021 OCT 30 09

FPSC-COMMISSION CLERK

October 30, 2009

Ms. Lisa Harvey
Division of Regulatory Compliance
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121A-TP – Parties' Position Matrix

Dear Ms. Harvey,

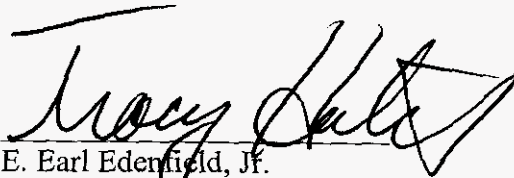
In accordance with the request of the Staff, please find attached a matrix showing AT&T and CLEC proposed changes to the Wholesale Performance Plan and the consensus negotiation status or recommendation how to proceed. AT&T and CompSouth (as the CLEC group's designee) worked together to draft the attached, and the participating CLECs¹ worked collaboratively to review, provide input, and compile positions on the areas at issue.

Please note that there are two documents attached; one is specific to the SQM Plan and the other is specific to the SEEM Plan. Where agreement has been reached on a matter, the agreement is noted in the matrix. In several instances, agreement on an issue is partial, with the remainder dependent on the Commission's resolution of AT&T's proposal to eliminate Tier 2 remedies. Please also note that there are no issues identified that the parties believe should be set directly for hearing at this time. The parties remain optimistic that most or all issues can be resolved with additional input from the Staff.

We look forward to working with the Staff to continue the collaborative process to resolve the outstanding issues in the current annual review.

Copies have been served to the parties shown on the attached Certificate of Service.

¹ The following CompSouth members have been involved in the docket: Access Point, Inc.; Birch Communications; Cavalier; Cbeyond; DIECA Communications, Inc., d/b/a Covad Communications Company; Level 3 Communications; NuVox; tw telecom; and XO Communications. Other participating CLECs have included Comcast, Verizon, PaeTec, STS, and Swiftel.



E. Earl Edenfield, Jr.
Tracy W. Hatch
Manuel A. Gurdian
c/o Gregory R. Follensbee
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301

Attorneys For BellSouth Telecommunications, Inc.
d/b/a AT&T Florida

/s/

Matthew J. Feil
Akerman Senterfitt, Attorneys at Law
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 224-9634

Attorneys for Competitive Carriers of the South,
Inc.

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 the 30th day of October, 2009 to the following:

Adam Teitzman
Staff Counsel
Lisa Harvey
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6175
Fax. No. (850) 413-6250
ateitzma@psc.state.fl.us
lsharvey@psc.state.fl.us

Howard E. (Gene) Adams
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
Post Office Box 10095 (32302)
215 South Monroe Street, 2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
gene@penningtonlawfirm.com
Represents Time Warner

David Konuch
Senior Counsel
Regulatory Law & Technology
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
dkonuch@fcta.com

Douglas C. Nelson
Sprint Nextel
233 Peachtree Street, NE
Suite 2200
Atlanta, GA 30303
Tel. No. 404 649-0003
Fax No. 404 649-0009
douglas.c.nelson@sprint.com

Vicki Gordon Kaufman
Keefe Anchors Gordon & Moyle P.A.
The Perkins House
118 N. Gadsden St.
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@kagmlaw.com
Represents Cebyond
Represents Deltacom

Dulaney O'Roark III (+)
Vice Pres. & Gen. Counsel – SE Region
Verizon
5055 N Point Parkway
Alpharetta, GA 30022
Tel. No. (678) 259-1449
Fax No. (678) 259-1589
De.OROark@verizon.com

D. Anthony Mastando
DeltaCom
VP-Regulatory Affairs
Senior Regulatory Counsel
Ste 400
7037 Old Madison Pike
Huntsville, AL 35806
Tel. No. (256) 382-3856
Fax No. (256) 382-3936
tony.mastando@deltacom.com

Beth Keating
Akerman Law Firm
106 East College Avenue
Suite 1200
Tallahassee, FL 32301
beth.keating@akerman.com

Ms. Katherine K. Mudge
Covad Communications Company
7000 N. MoPac Expressway, Floor 2
Austin, TX 78731
Tel. No. (512) 514-6380
Fax No. (512) 514-6520
kmudge@covad.com

Cbeyond Communications, LLC
Charles E. (Gene) Watkins
320 Interstate North Parkway
Suite 30
Atlanta, GA 30339
Tel. No. (678) 370- 2174
Fax No. (978) 424-2500
gene.watkins@cbeyond.net

Time Warner
Carolyn Ridley
555 Church Street, Ste. 2300
Nashville, TN 37219
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
carolyn.ridley@twtelecom.com

Susan J Berlin
NuVox
2 N Main St
Greenville, Sc 29601
Tel No (864) 331 7323
sberlin@nuvox.com

Matthew J. Feil
Akerman Senterfitt
106 East College Avenue
Suite 1200
Tallahassee, FL 32301
Tel. No. (850) 224-9634
matt.feil@akerman.com
Represents CompSouth/Nuvox



Tracy W. Hatch

(+) Signed Protective Agreement

Proposed Florida SEEM Plan

AT&T and CLECs Joint Matrix

10-30-2009

DOCUMENT NUMBER-DATE
11021 OCT 30 8
FPSC-COMMISSION CLERK

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

FLORIDA SEEM ADMINISTRATIVE PLAN			
Contents		Page	
Contents			Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.
Administrative Plan.....		1	
1 – Scope.....		1	
2 – Reporting.....		1	
3 – Review of Measurements and Enforcement Mechanisms.....		2	
4 – Enforcement Mechanisms.....		2	
4.1 - Definitions.....		2	
4.2 - Application.....		3	
4.3 - Methodology.....		4	
4.4 - Payment of Tier-1 and Amounts.....		65	
4.5 - Limitations of Liability.....		86	
4.6 - Change of Law.....		98	
4.7 - Affiliate Reporting.....		10	
4.8-7 - Enforcement Mechanism Cap.....		109	
4.9-8 - Audits.....		119	
4.10-9 - Dispute Resolution.....		119	

DOCUMENT NUMBER-DATE
11021 OCT 30 08
FPSC-COMMISSION CLERK

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Appendix E: BellSouth-AT&T SEEM Remedy Calculation Procedures.4034</p> <p>E.1 – BellSouth-AT&T SEEM Remedy Procedure..... 4034</p> <p>E.2 – Tier-1 Calculation For Benchmarks..... 4636</p> <p>E.3 – Tier-1 Calculation For Benchmarks (In The Form Of A Target)4838</p> <p>E.4 – Regional and State Coefficients..... 4939</p> <p>Appendix F: BellSouth-AT&T's Policy on Reposting of Performance Data and Recalculation of SEEM Payments..... 5240</p>		
Administrative Plan			
1	Scope		
1.1	<p>This Administrative Plan (Plan) includes Service Quality Measurements (SQM) with corresponding Self Effectuating Enforcement Mechanisms (SEEM) to be implemented by BellSouth-AT&T pursuant to Order No. PSC 07-0286 PAA-TP (TBD) issued on April 3, 2007 TBD by the Florida Public Service Commission (the "Commission") in Docket No. 000121A-TP (TBD), and as confirmed by Consummating Order No. PSC 07-0305 CO-TP (TBD), issued by the Commission on May 7, 2007 (TBD).</p> <p>Rationale:</p> <p>Throughout the SEEM document, an administrative change is made changing BellSouth to AT&T.</p> <p>Administrative change that will be made to reflect order and date of order to be issued at close of the review.</p>		Parties Agree.
1.2	Upon the Effective Date of this Plan, all appendices referred to in this Plan		Parties Agree.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>will be located on the BellSouth Performance Measurements and Analysis Platform AT&T website at http://pmapp.bellsouth.com.</p> <p>Rationale: Updated to refer to an AT&T website name that may change.</p>		<p>AT&T agrees to keep the URL references on this page and reference as "AT&T performance measurement website" on all other pages where this URL applies.</p>
2	Reporting		
2.1	<p>In providing services pursuant to the Interconnection Agreements between BellSouth-AT&T and each CLEC, BellSouth-AT&T will report its performance to each CLEC in accordance with BellSouth's-AT&T's SQMs and pay remedies in accordance with the applicable SEEM, which are posted on the Performance Measurement Reports-AT&T website.</p> <p>Rationale: Updated to refer to an AT&T website name that may change.</p>		<p>Parties Agree.</p>
2.2	<p>BellSouth will make performance reports available to each CLEC on a monthly basis. The reports will contain information collected in each performance category and will be available to each CLEC via the Performance Measurements and Analysis Platform website. BellSouth will also provide electronic access to the raw data underlying the SQMs.</p> <p>Rationale: Moved verbiage specific to SQM to Report Publication Dates section of SQM Plan.</p>		<p>Parties Agree.</p>
2.3	<p>Final validated SQM reports will be posted no later than the last day of the month following the data month in which the activity is incurred, or the first business day thereafter. Final validated SQM reports not posted by this time will be considered late.</p> <p>Rationale: Moved verbiage specific to SQM to Report Publication Dates section of SQM Plan.</p>		<p>Parties Agree.</p>
2.42	<p>Final validated SEEM reports will be posted on the Performance Measurements and Analysis Platform AT&T website on the 15th of the</p>		<p>Parties Agree.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>month, following the posting of final validated SQM reports for that data month or the first business day thereafter.</p> <hr/> <p>Rationale: Limited to what is in the Commission's current rule. No change.</p>		
2-5	<p>BellSouth shall pay fines to the Commission, in the aggregate, for all late SQM and SEEM reports in the amount of \$2000 per day. Such payment shall be made to the Commission for deposit into the state General Revenue Fund within fifteen (15) calendar days of the end of the reporting month in which the late publication of the report occurs.</p> <hr/> <p>Rationale: Eliminate to simplify plan. AT&T consistently posts reports on time with no late postings since 2003. Late postings have no impact on level of service provided to CLECs and thus, CLECs' ability to compete.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
2-6	<p>BellSouth shall pay fines to the Commission, in the aggregate, for all reposted SQM reports in the amount of \$100 per day. If such reposting is associated with any Data Notification, a maximum of ninety (90) days may be deducted from the fine. The circumstances which may necessitate a reposting of SQM reports are detailed in Appendix F, Reposting of Performance Data and Recalculation of SEEM Payments. Such payments shall be made to the Commission for deposit into the state General Revenue Fund within fifteen (15) calendar days of the final publication date of the report or the report revision date.</p> <hr/> <p>Rationale: Eliminate to simplify plan. Reposting have no impact on level of service provided to CLECs and thus, CLECs' ability to compete. Interest is paid for any underpayment of remedies resulting from reposting. Emphasis should be on complete and accurate reports, not fines for efforts to correct data.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
2-7	<p>Tier II SEEMS payments and Administrative fines for late and reposted reports will be sent to the Commission. Checks and the accompanying transmittal letter will be postmarked on or before the 15th of the month of</p>		<p>Area to be subject of PSC</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>the first business day thereafter, when the 15th falls on a non-business day.</p> <p>Rationale: Eliminate references to PMAP in the current plan. Set a shorter 2 month reporting time.</p>		Workshop and ultimately staff recommendation.
2.83	<p>BellSouthAT&T shall retain the performance measurement raw data files for a period of 18 months and further retain the monthly reports produced in PMAP for a period of three years.</p> <p>Rationale: Remove reference to PMAP to allow AT&T to migrate to a new platform changes in the future.</p>		Parties Agree.
2.91	<p>BellSouthAT&T will provide documentation of late and reposted SQM and SEEM Reports during the reporting month that the data is posted to the website. These notations may be viewed on the Performance Measurements website from the PMAP home page on the Current Month Updates link.</p> <p>Rationale: Remove reference to PMAP to allow AT&T to migrate to a new platform changes in the future.</p>		Parties Agree.
3	Review of Measurements and Enforcement Mechanisms		
3.1	<p>BellSouth will participate in annual review cycles. A collaborative work group, which will include BellSouth, interested CLECs and the Commission will review the Performance Assessment Plan for additions, deletions or other modifications. After the first six months of data are available under this version of SEEM, the Florida PSC Staff will have a special one-time workshop to review the operation of the Plan. Thereafter, reviews will be on an annual basis. A workshop and/or conference shall be organized and held periodically for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative.</p> <p>Rationale: Proposing to change annual review to periodic as needed. Language mirrors that proposed in the Administrative Changes section of</p>		<p>Area for further negotiations by parties.</p> <p>Noted below is the Plan language currently under negotiation by the parties.</p> <p>BellSouth will participate in annual review cycles. A collaborative work group, which will include BellSouth, interested CLECs and the Commission will review the Performance Assessment Plan for additions, deletions or other modifications. After the first six months of data are available under this version of SEEM, the Florida PSC Staff will have a special one-time workshop to review the operation of the Plan. Thereafter, reviews will be on an annual</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	the SQM Plan		<u>basis. A workshop and/or conference shall be organized and held periodically or at the request of either party for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative.</u>
3.1.1	<p><u>AT&T may make administrative changes that do not substantively change the Service Quality Measurements or SEEM Administrative Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes.</u></p> <p>Rationale: Providing language to modify SEEM Plan for administrative changes that do not substantively change the plan, to simplify terms earlier in the plan and ensure document is a readable form of the terms of the existing OSS systems and processes.</p>		<p>Area for further negotiations by parties.</p> <p>Noted below is the Plan language currently under negotiation by the parties.</p> <p><u>AT&T may make administrative changes that do not substantively change the SQM Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes. An administrative change is one that corrects typographical, spelling, grammatical, or computational errors, updates website addresses and incorporates modifications to architecture implemented in an OSS release following the approved Change Management process. Administrative changes will not change the intent or the plan language of the document.</u></p>
3.2	<p><u>In the event a dispute arises regarding the order of modification or amendment to the SQMs or SEEMs, the parties will refer the dispute to the Florida Public Service Commission. As provided in the Florida SEEM Administrative Plan, no changes to remedies liquidated damages (remedies) or any other term or condition of this Attachment affecting remedies, including but not limited to the level of remedies to be paid by AT&T and the application of a benchmark, shall be made except by the consent of the Parties and shall not be effective until memorialized in an amendment to the Florida SEEM Administrative Plan. Except as otherwise provided in the Florida SEEM Administrative Plan, neither Party shall have a right to seek state regulatory authority jurisdiction or intervention to address any issues affecting remedies. Any dispute concerning remedies or modification to the current remedy plan shall be resolved pursuant to the dispute resolution provisions contained herein.</u></p>		<p>Parties Agree. AT&T withdraws proposed change and parties agree to keep "as is" currently worded.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Part 1.1.1</p> <p>Procedure for handling the complaints and the resolution process</p>		
4.0	Enforcement Mechanisms		
4.1	Definitions		
4.1.4	<p><i>Test Statistic and Balancing Critical Value</i> – means by which enforcement will be determined using statistically valid equations/methods. The Test Statistic and Balancing Critical Value are set forth in Appendices C, D, and E of this Plan.</p> <hr/> <p>Rationale:</p> <p>Verbiage change made to comply with retail customer terminology</p>		Parties Agree.
4.1.5	<p><i>Cell</i> – grouping of transactions at which like-to-like comparisons are made. For example, all BellSouth AT&T retail (POTS) services, for residential customers, requiring a dispatch in a particular wire center, at a particular point in time will be compared directly to CLEC resold (POTS) services for residential customers, requiring a dispatch, in the same wire center, at a similar point in time. When determining compliance, these cells can have a positive or negative Test Statistic. See Appendices C, D and E of this Plan.</p> <hr/> <p>Rationale:</p> <p>Name change from BellSouth to AT&T.</p> <p>Clarification of example for explicit like-to-like comparison. Like-to-like comparisons necessitates that AT&T compare resold POTS service to retail POTS services.</p> <p>This is not a change to SFPM remedy processing</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
4.1.6	<p><i>Delta, Psi and Epsilon, and Lambda</i> – measures of the meaningful difference between BellSouth AT&T performance and CLEC performance. For individual CLECs or the Delta (δ) value shall be 0.5 and for the CLEC aggregate the Delta value shall be 0.35. The value for Psi (ψ) shall be 3 for individual CLECs and 2 for the CLEC aggregate. The value for Epsilon (ϵ) shall be 4 for individual CLECs and 2.5 for both individual CLECs and the CLEC aggregate. The value of Lambda (λ) shall be 1 for both individual CLECs and the CLEC aggregate.</p> <hr/> <p>Rationale:</p> <p>Name change from BellSouth to AT&T.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Each of the following is a change to the current version of the proposed fee schedule. The change is indicated by a change bar.</p> <p>Change the definition of "affected volume" to be the volume of transactions that are subject to the proposed fee schedule. The definition of "affected volume" is not sensitive to the sample size. The definition of "affected volume" is not sensitive to the sample size. The definition of "affected volume" is not sensitive to the sample size. The definition of "affected volume" is not sensitive to the sample size.</p>		
4.1.8	<p><i>Tier 2 Enforcement Mechanisms</i>— fees paid directly to the Florida Public Service Commission or its designee. Tier 2 Enforcement Mechanisms are triggered by three consecutive monthly failures at the submetric level in which BellSouth performance is out of compliance or does not meet the benchmarks for the aggregate of all CLEC data.</p> <p>Rationale: Eliminate reference to Tier 2. Rationale of elimination of Tier 2 provided in proposed changes to FDM document.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
4.1.41(i)	<p><i>Cell Ranking</i> – placing cells in rank order from highest to lowest, where the cell with the most negative $z\text{-score}/Z\text{-Score}$ is ranked highest and the cell with the least negative $z\text{-score}/Z\text{-Score}$ is ranked lowest.</p> <p>Rationale: Administrative correction to prior verbiage to provide consistency throughout all parts of the document.</p>		Parties Agree.
4.1.42(i)	<p><i>Cell Correction</i> – method for determining the quantity of transactions to be remedied, referred to as "affected volume," wherein the cell-level modified $z\text{-score}/Z\text{-Score}$ for the highest ranked cell is first changed to zero ("corrected") and then the next highest, progressively, until the overall level truncated $z\text{-score}/Z\text{-Score}$ is equal to the Balancing Critical Value or zero as required by the Fee Schedule Remedy Calculation Procedures. Either all of the transactions in a corrected cells are remedied or a prorated share (determined through interpolation) are remedied.</p> <p>Rationale: Administrative correction to verbiage in prior version of SEEM document for clarification purposes. "Modified" Z pertains only to averages, but cell correction pertains to all three types of measures. Z-Score is a more general term. AT&T SE uses classical Z-Score for rates and proportions. No</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Change 1.3 to SEEM text.</p> <p>CLEC comments requested changes to the Proposed Fee Schedule for the CLECs to the SEEM.</p> <p>Review of the Regulatory and Compliance Issues between BSW and BSR (along with proposed changes to Appendix I)</p> <p>Fee Schedule has nothing to do with CLEC's operation. No changes to the SEEM text.</p>		
4.2	Application		
4.2.1	<p>The application of the Tier-1 and Tier-2 Enforcement Mechanisms does not foreclose other legal and regulatory claims and remedies available to each CLEC.</p> <hr/> <p>Rationale</p> <p>Eliminate reference to Tier 2</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
4.2.2	<p>Payment of any Tier-1 or Tier-2 Enforcement Mechanisms shall not be considered as an admission against interest or an admission of liability or culpability in any legal, regulatory or other proceeding relating to BellSouthAT&T's performance and the payment of any Tier-1 or Tier-2 Enforcement Mechanisms shall not be used as evidence that BellSouthAT&T has not complied with or has violated any state or federal law or regulation.</p> <hr/> <p>Rationale</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
4.3	Methodology		
4.3.1.3		<p>Tier-1 Enforcement Mechanisms apply on a per transaction basis and will escalate based upon the number of consecutive months that fail for each Enforcement Mechanism Element for which BellSouth has reported non-compliance. Failures beyond Month 6 will be subject to Month 6 fees and an <u>additional flat fee for each month greater than 6</u>. All transactions for an individual CLEC will be consolidated for purposes of calculating Tier-1 Enforcement Mechanisms.</p>	Area to be subject of PSC Workshop and ultimately staff recommendation.
4.3.1.4	<p>For submetrics that are assessed based on Enforcement Measurement Retail Analog compliance criteria, the fee paid for a particular submetric</p>		Area to be subject of PSC

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<p>that failed at the Tier 1 level will be differentiated based on two criteria. First, the Tier 1 fee paid will be based on whether the same submetric that failed at the Tier 1 level (CLEC-specific) also failed at the CLEC aggregate level in the same month. Second, the Tier 1 fee paid will be based on whether the transactions in the cells to be remedied correct the overall truncated Z score from the region below the Balancing Critical Value ("BCV") to the BCV or from the BCV to zero. Depending on which of these criteria apply, a different multiplier will be applied to the Fee Schedule (shown in Appendix A, Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination) to determine the amount of the Tier 1 payments. The chart below shows the applicable multipliers:</p> <table border="1" data-bbox="314 511 1096 738"> <thead> <tr> <th>CLEC Aggregate Performance</th> <th>Per Transaction Fee Below BCV</th> <th>Per Transaction Fee Between BCV and 0</th> </tr> </thead> <tbody> <tr> <td>Passes</td> <td>(Fee)²(3-2)</td> <td>(Fee)²(1-3)</td> </tr> <tr> <td>Fails</td> <td>(Fee)²(3)</td> <td>(Fee)²(2-3)</td> </tr> </tbody> </table> <p>No multiplier applies for the Billing Invoice Accuracy measure.</p> <p>Rationale</p> <p>Propose elimination of multipliers</p> <p>The additional fees paid to the CLEC as the result of the multiplier are not compensatory with the service impact</p> <ul style="list-style-type: none"> a. Current Fee Schedule payments, incremented each month for success or misses, are sufficient remedies for service impact. <p>The regional performance results for all CLECs does not incrementally impact an individual CLEC's results</p>	CLEC Aggregate Performance	Per Transaction Fee Below BCV	Per Transaction Fee Between BCV and 0	Passes	(Fee) ² (3-2)	(Fee) ² (1-3)	Fails	(Fee) ² (3)	(Fee) ² (2-3)		<p>Workshop and ultimately staff recommendation.</p>
CLEC Aggregate Performance	Per Transaction Fee Below BCV	Per Transaction Fee Between BCV and 0										
Passes	(Fee) ² (3-2)	(Fee) ² (1-3)										
Fails	(Fee) ² (3)	(Fee) ² (2-3)										
4.3.1.5	<p>For submetrics that are assessed based on Enforcement Measurement Benchmark compliance criteria the fee paid for a particular submetric that failed at the Tier 1 level will be differentiated based on whether the same submetric that failed at the Tier 1 level (CLEC-specific) also failed at the CLEC aggregate level in the same month. A different multiplier will be applied to the Fee Schedule (shown in Appendix A, Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination) to determine the amount of the Tier 1 payments. The chart below shows the applicable multipliers:</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>									

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments						
	<table border="1" data-bbox="317 196 1029 467"> <thead> <tr> <th data-bbox="317 196 567 302">CLEC Aggregate Performance</th> <th data-bbox="567 196 1029 302">Per Transaction Fee</th> </tr> </thead> <tbody> <tr> <td data-bbox="317 302 567 362">Passes</td> <td data-bbox="567 302 1029 362">(Fee)*(3-2)</td> </tr> <tr> <td data-bbox="317 362 567 467">Fails</td> <td data-bbox="567 362 1029 467">(Fee)*(8-2) for Ordering and Flow-Through (Fee)*(3) for all other benchmark-measures</td> </tr> </tbody> </table> <p data-bbox="317 483 1029 776"> Rationale: Propose elimination of multipliers. The calculation of fees paid to the CLECs is the result of the fact that we are not compensated with the service we provide. Current fee schedule payments are made to each CLEC for successive misses, and sufficient remedies for actual service impact. The regional performance results for all CLECs does not incrementally impact an individual CLEC's results. </p>	CLEC Aggregate Performance	Per Transaction Fee	Passes	(Fee)*(3-2)	Fails	(Fee)*(8-2) for Ordering and Flow-Through (Fee)*(3) for all other benchmark-measures		
CLEC Aggregate Performance	Per Transaction Fee								
Passes	(Fee)*(3-2)								
Fails	(Fee)*(8-2) for Ordering and Flow-Through (Fee)*(3) for all other benchmark-measures								
4.3.2	<p data-bbox="317 800 1029 954"> Tier 2 Enforcement Mechanisms will be triggered by BellSouth's failure to achieve applicable Enforcement Measurement Compliance or Enforcement Measurement Benchmarks for the State of Florida for given Enforcement Measurement Elements for three consecutive months. The method of calculation is set forth in Appendices C, D, and E of this Plan. </p> <p data-bbox="317 963 1029 1109"> Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided for proposed changes to SQM document. </p>		<p data-bbox="1830 800 2478 930"> Area to be subject of PSC Workshop and ultimately staff recommendation. </p>						
4.3.2.4	<p data-bbox="317 1133 1029 1222"> Tier 2 Enforcement Mechanisms apply, for an aggregate of all CLEC data generated by BellSouth, on a per-transaction basis for each Enforcement Mechanism Element for which BellSouth has reported non-compliance. </p> <p data-bbox="317 1230 1029 1433"> Rationale: Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided for proposed changes to SQM document. </p>		<p data-bbox="1830 1133 2478 1279"> Area to be subject of PSC Workshop and ultimately staff recommendation. </p>						
4.3.2.2	<p data-bbox="317 1458 1029 1490"> The fee paid for a particular submetric that failed at the Tier 2 level will be </p>		<p data-bbox="1830 1458 2478 1507"> Area to be subject of PSC </p>						

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>as shown in Appendix A, Table 2.</p> <hr/> <p>Rationale:</p> <p>Eliminate section to simplify plan.</p> <p>Rationale for change: eliminate section to simplify plan. See also the following SWM document:</p>		<p>Workshop and ultimately staff recommendation.</p>
4.3.3	<p>The Market Penetration Adjustments will be applied based on the following provisions to enhance competition for nascent products. In order to ensure parity and benchmark performance where CLECs order low volumes of advanced and nascent services, BellSouth will make additional Tier 1 and Tier 2 payments where performance standards for the following measures are not met, if the measurement applies to the nascent service:</p> <ul style="list-style-type: none"> • Percent Missed Installation Appointments • Average Completion Interval • Missed Repair Appointments • Maintenance Average Duration • Average Response Time for Loop Make-up Response Time-Electronic Information <hr/> <p>Rationale:</p> <p>Eliminate section to simplify plan.</p> <p>Market Penetration Adjustments put in place to enhance competition for nascent services.</p> <p>No new services or products exist now or for the foreseeable future that can be categorized as nascent.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.3.3.1	<p>These additional payments will only apply when there are more than 10 and less than 100 average units in service statewide for the preceding three-month period. The additional payments in the form of a market penetration adjustment will be made if BellSouth fails to provide parity for the above measurements as determined by the use of the Truncated Z-test and the balancing critical value or fails to meet the established benchmark.</p> <hr/> <p>Rationale:</p> <p>Eliminate section to simplify plan.</p> <p>Market Penetration Adjustments put in place to enhance competition for</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>4.3.3.2</p> <p>No new services or products exist now or for the foreseeable future that can be categorized as nascent.</p>		
4.3.3.2	<p>BellSouth shall calculate the new Tier 1 and Tier 2 payments, which include the market penetration adjustment by applying the normal method of calculating affected volumes as ordered by the Commission and trebling the normal Tier 1 and Tier 2 remedy.</p> <hr/> <p>Rationale</p> <p>Eliminate section to simplify plan.</p> <p>Market Penetration Adjustments put in place to enhance competition for nascent services.</p> <p>No new services or products exist now or for the foreseeable future that can be categorized as nascent.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.3.3.3	<p>If, for the three months of data, there were 100 observations or more on average for the sub-metric, then no additional payments under this market penetration adjustment provision will be made. Further, market penetration adjustments shall no longer apply if 24 months have elapsed since the first unit of the nascent service was installed.</p> <hr/> <p>Rationale:</p> <p>Eliminate section to simplify plan.</p> <p>Market Penetration Adjustments put in place to enhance competition for nascent services.</p> <p>No new services or products exist now or for the foreseeable future that can be categorized as nascent.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.3.3.4	<p>CLECs may file a petition with the Commission in order to add a service to the list of services for which the market penetration adjustment may apply.</p> <hr/> <p>Rationale</p> <p>Eliminate section to simplify plan.</p> <p>Market Penetration Adjustments put in place to enhance competition for nascent services.</p> <p>No new services or products exist now or for the foreseeable future that can be categorized as nascent.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.3.5	<p>Any payments made under this market penetration adjustment provision are subject to the Absolute Cap set by the Commission.</p> <p>Rationale:</p> <p>Eliminate section 4.3.5 entirely.</p> <p>Market Penetration Adjustment is part of a larger market penetration for market services.</p> <p>No new services or products exist now or for the foreseeable future that can be categorized as new.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.3.42	<p>For Tier-1 and Tier-2 evaluations, the retail analog or benchmark are/is the same as for the SQM. See the SQM for SEEM retail analogs and benchmarks.</p> <p>Rationale:</p> <p>Eliminate reference to Tier 2</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p> <p>Verbiage change for clarity.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.4	<p>Payment of Tier-1 and Tier-2 Amounts</p>		
4.4.1	<p>If BellSouth/AT&T performance triggers an obligation to pay Tier-1 Enforcement Remedy Mechanisms to a CLEC or an obligation to remit Tier-2 Enforcement Mechanisms to the Commission or its designee, BellSouth, AT&T shall make payment in the required amount on the CLEC's first bill after the day upon which the final validated SEEM reports are posted on the Performance Measurements and Analysis Platform/AT&T website as set forth in Section 2.4 above. AT&T's performance remedy liabilities to an individual CLEC in any month will not exceed (will be capped at) the total monthly billed revenue due AT&T for services provided to the CLEC in the same month for which the remedy liability was incurred.</p> <p>Rationale:</p> <p>Eliminate reference to Tier 2</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p> <p>Remove reference to PMAP to allow flexibility in the event platform changes in the future.</p> <p>SEEM remedy should be proportionate to level of failure.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.4.3	<p>For each day after the due date that BellSouth fails to pay the required Tier 2 Enforcement Mechanisms, BellSouth will pay the Commission an additional \$1,000 per day. If BellSouth pays less than the required amount, BellSouth will pay the Commission 12% simple interest per annum on the difference between the required amount and the amount previously paid. The underpayment and interest will be paid to the Commission in the next month's payment cycle. Remedy caps will be applied to high volume measures and those that are not end user impacting. These measures are:</p> <ul style="list-style-type: none"> • <u>Firm Order Confirmation Timeliness</u> • <u>Percent Flow Through Service Requests</u> • <u>Reject Interval</u> • <u>Service Order Accuracy</u> • <u>Trunk Group Performance</u> <p>The caps are a maximum remedy amount payable to a CLEC per measure, per month. These caps may be found in Appendix A, Table 2: Maximum Remedy for Tier-1 Measures with a Cap.</p> <hr/> <p>Rationale</p> <p>Eliminate late payment fine to simplify plan</p> <p>AT&T consistently processes payments promptly. Tax and late payments 2 times in past 7 years.</p> <p>Late payments have no impact on level of service provided to CLECs and thus, CLEC's ability to compete.</p> <p>Interest will be paid in the event of a late payment.</p> <p>Implement remedy caps for Tier-1 for high volume metrics (OC1, PFL, RL, SOA, and TGP) and those associated with I SR submissions and processing (all but IGP)</p> <p>Measurements are not sole indicator regarding meeting service commitment to CLEC end user.</p> <p>SEEM remedy should be proportionate to level of failure.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.4.5	<p>For Tier 2 Enforcement Mechanisms, if the Commission requests clarification of an amount paid, a written claim shall be submitted to BellSouth within sixty (60) days after the payment date. BellSouth shall investigate all claims and provide the Commission written findings within thirty (30) days after receipt of the claim. If BellSouth determines the</p>		<p>Area to be subject of PSC Workshop and ultimately staff</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Commission is owed additional amounts. BellSouth shall pay such additional amounts within thirty (30) days after its findings along with 12% simple interest per annum.</p> <p>Rationale:</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		<p>recommendation.</p>
4.4.65	<p>Any adjustments for underpayment or overpayment of calculated Tier 1 and Tier 2 remedies will be made consistent with the terms of BellSouth's AT&T's Policy On Reposting Of Performance Data and Recalculation of SEEM Payments, as set forth in Appendix F of this document. If any circumstance necessitating remedy adjustments should occur that is not specifically addressed in the Reposting Policy, such adjustments will be made consistent with the terms defined in Paragraph 6.7 of the Reposting Policy ("AT&T will recalculate applicable SEEM payments, where technically feasible, for a maximum of three months in arrears. SEEM payments will be subject to recalculations for a maximum of three months in arrears unless the Florida Commission orders otherwise...").</p> <p>Rationale:</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p> <p>Delete reference to Florida Commission as set forth in proposed AT&T will abide by all PSC orders.</p>		<p>Parties Agree except fro resolution of Tier-II elimination that is highlighted. Noted below is the Plan language to which the parties agree.</p> <p>Any adjustments for underpayment or overpayment of calculated Tier 1 and Tier 2 remedies will be made consistent with the terms of BellSouth's AT&T's Policy On Reposting Of Performance Data and Recalculation of SEEM Payments, as set forth in Appendix F of this document. If any circumstance necessitating remedy adjustments should occur that is not specifically addressed in the Reposting Policy, such adjustments will be made consistent with the terms defined in Paragraph 6.7 of the Reposting Policy ("payments will be subject to recalculations for a maximum of three months in arrears unless the Florida Commission orders otherwise...").</p>
4.4.76	<p>Any adjustments for underpayment or overpayment will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the final paid dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.</p> <p>Rationale:</p> <p>Remove reference to PARIS to allow flexibility in the event platform changes in the future.</p>		<p>Parties Agree.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.4.87	<p>Where there is a SEEM adjustment, in addition to the submetric, data month(s), and adjustment amount, BellSouth<u>AT&T</u> will include an adjustment code on the CLEC specific Tier-1 Tier-1 or Tier-2 PARIS reports on the PMAP<u>AT&T Performance Measurement</u> website. Then, on a separate document under the Exhibits link on the BellSouth<u>PMAP</u><u>AT&T</u> website, this code will be cross-referenced with a brief narrative description of the adjustment. These codes and descriptions will be applicable to all States<u>states</u> where an adjustment was applied. If there are multiple adjustment codes, the code explanation document <u>can be accessed under the Exhibits link on the AT&T website that will contain all of the codes and the narrative descriptions for each code. An explanation of the cause of the adjustment and the data months impacted by the adjustment will be included in the narrative.</u></p> <p>Rationale: Eliminate reference to Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM document Remove reference to PMAP website. The code will be a cross-platform change in the future. Remove reference to "format" in case specific to PMAP website layout and need flexibility for changes in the future.</p>		<p>Parties Agree except for resolution of Tier-II elimination that is highlighted.</p>
4.5	<p>Limitations of Liability</p>		
4.5.1	<p>BellSouth<u>AT&T</u> will not be obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms for non-compliance with a performance measure if such non-compliance results from a CLECs acts or omissions that cause failed or missed performance measures. These acts or omissions include but are not limited to, accumulation and submission of orders at unreasonable quantities or times, failure to follow publicly available procedures, or failure to submit accurate orders or inquiries. BellSouth<u>AT&T</u> shall provide each CLEC and the Commission with reasonable notice of, and supporting documentation for, such acts or omissions. Each CLEC shall have 10 business days from the filing of such Notice to advise BellSouth<u>AT&T</u> and the Commission in writing of its intent to challenge, through the dispute resolution provisions of this plan, the claims made by BellSouth<u>AT&T</u>. BellSouth<u>AT&T</u> shall not be obligated to pay any amounts subject to such disputes until the dispute is resolved.</p> <p>Rationale: Eliminate reference to Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM</p>		<p>Parties Agree except for resolution of Tier-II elimination that is highlighted.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
4.5.2	<p>BellSouthAT&T shall not be obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms (SEEM payments) for non-compliance with a performance measurement if such non-compliance was the result of any Force Majeure Event that either directly or indirectly prevented, restricted, or interfered with performance as measured by the SQM SEEM Plan. Such Force Majeure Events include non-compliance caused by reason of fire, flood, earthquake or like acts of God, wars, revolution, civil commotion, explosion, acts of public enemy, embargo, acts of the government in its sovereign capacity, labor difficulties, including without limitation, strikes, slowdowns, picketing, or boycotts, or any other circumstances beyond the reasonable control and without the fault or negligence of BellSouthAT&T. BellSouthAT&T, upon giving prompt notice to the Commission and CLECs as provided below, shall be excused from such performance on a day-to-day basis to the extent of such prevention, restriction, or interference; provided, however, that BellSouthAT&T shall use diligent efforts to avoid or remove such causes of non-performance.</p> <p>Rationale: Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 due to proposed changes to SQM document.</p>	<p>BellSouth shall not be obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms (SEEM payments) for non-compliance with a performance measurement if such non-compliance was the result of any Force Majeure Event that either directly or indirectly prevented, restricted, or interfered with performance as measured by the SQM SEEM Plan. Such Force Majeure Events include non-compliance caused by reason of fire, flood, earthquake or like acts of God, wars, revolution, civil commotion, explosion, acts of public enemy, embargo, acts of the government in its sovereign capacity, labor difficulties, including without limitation, strikes, slowdowns, picketing, or boycotts, or any other circumstances beyond the reasonable control and without the fault or negligence of BellSouth. BellSouth, upon giving prompt notice to the Commission and CLECs as provided below, shall be excused from such performance on a day-to-day basis to the extent of such prevention, restriction, or interference; provided, however, that BellSouth shall use diligent efforts to avoid or remove such causes of non-performance. <u>As foreseeable events, rain and lightning, shall not constitute the basis for a Force Majeure Event, unless a disaster or emergency is officially declared by State or Federal government in the area where the Force Majeure Event also occurs.</u></p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.5.2.1	<p>To invoke the application of Section 4.5.2 (Force Majeure Event), BellSouthAT&T will provide written notice to the Commission and post notification of such filing on BellSouthAT&T's website wherein BellSouthAT&T will identify the Force Majeure Event, the affected measures, and the, if applicable, the impacted wire centers, including affected NPAs and NXXs.</p> <p>Rationale: Impacted Wire Centers, including affected NPAs and NXXs, are only applicable to Force Majeure Events to the Network Infrastructure.</p>	<p>To invoke the application of Section 4.5.2 (Force Majeure Event), <u>within</u> <u>Fifteen (15) calendar days of the Force Majeure Event's beginning</u> BellSouth will provide written notice to the Commission and post notification of such filing on BellSouth's website wherein BellSouth will identify the Force Majeure Event, the affected measures, and the impacted wire centers, including affected NPAs and NXXs. <u>Unless the nature of the Force Majeure Event precludes such notice, BellSouth shall report via a web site posting a list of the impacted wire centers and a list of associated trouble reports or held orders within 24 hours of the beginning of the Force Majeure event.</u></p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
4.5.2.4	<p>During the pendency of a Force Majeure Event, BellSouthAT&T shall file with the Commission periodic updates of its restoration/recovery progress and efforts as agreed upon between the Commission Staff and BellSouthAT&T. The Commission Staff will consider reasonable requests from affected carriers on such updates' contents and frequency, including the need for weekly progress update reports. Additionally, BellSouthfor Force Majeure events <u>directly impacting a geographic area of the network infrastructure, AT&T will post to the Emergency Preparedness</u></p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>and Restoration AT&T website periodic updates of its restoration/recovery progress and efforts. BellSouth AT&T will post at a minimum for the area where Force Majeure has been declared where applicable: the identity of each wire center and associated NPA/NXXs; and the wire centers' color status of wire centers based on the Emergency Preparedness and Restoration guidelines; the total number of BellSouth pending service orders; the total number of CLEC pending service orders; the total number of BellSouth pending trouble reports; and the total number of CLEC pending trouble reports-coded Area Dispatch Status report.</p> <p>Rationale: Area Dispatch Status Report provides sufficient information for CLECs to ascertain the status of the restoration and report to their customers. Emergency Preparedness and Restoration guidelines were specific to BellSouth and no longer applicable for AT&T service.</p>		
4.6	Change of Law		
4.6.1	<p>Upon a particular Commission's issuance of an Order pertaining to Performance Measurements or Remedy Plans in a proceeding expressly applicable to all CLECs, BellSouth AT&T shall implement such performance measures and remedy plans covering its performance for the CLECs, as well as any changes to those plans ordered by the Commission, on the date specified by the Commission. If a change of law occurs which may change BellSouth AT&T's obligations, parties may petition the Commission within 30 days to seek changes to the SQM and SEEM plans in accordance with such change of law. Performance Measurements and remedy plans that have been ordered by the Commission can currently be accessed via the AT&T website, at http://pmap.bellsouth.com. Should there be any difference between the performance measure and remedy plans on BellSouth AT&T's website and the plans the Commission has approved as filed in compliance with its orders, the Commission-approved compliance plan will supersede as of its effective date.</p> <p>Rationale: Updated to refer to an AT&T website rather than provide URL that may change.</p>		Parties Agree.
4.7	Affiliate Reporting		
4.7.1	<p>BellSouth shall provide to each CLEC affiliate, upon request, the following information: the number of BellSouth CLEC affiliates; the number of BellSouth CLEC affiliates that are BellSouth CLEC affiliates; and the number of BellSouth CLEC affiliates that are BellSouth CLEC affiliates.</p>		Parties Agree.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Rationale:</p> <p>Noting we have shared the information about the Tier-2 Enforcement Mechanism Cap with the CLECs, AT&T does not have separate proposed changes regarding the use of the OCS in various systems and interfaces.</p>		
4.87	Enforcement Mechanism Cap		
4.87.1	<p>BellSouthAT&T's total liability for the payment of Tier-1 and Tier-2 Enforcement Mechanisms shall be collectively and absolutely capped at 36% of net revenues in Florida, based upon the most recently reported ARMIS data.</p> <p>Rationale:</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		Parties Agree except for resolution of Tier-II elimination that is highlighted.
4.87.3	<p>If BellSouthAT&T's payment of Tier-1 and Tier-2 Enforcement Mechanisms would have exceeded the cap referenced in this plan, a CLEC may commence a proceeding with the Commission to demonstrate why BellSouthAT&T should pay any amount in excess of the cap. The CLEC shall have the burden of proof to demonstrate why, under the circumstances, BellSouthAT&T should have additional liability.</p> <p>Rationale:</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		Parties Agree except for resolution of Tier-II elimination that is highlighted.
4.98	Audits		
4.98.1	<p>BellSouthAT&T currently provides CLECs with certain audit rights as a part of their individual interconnection agreements. If requested ordered by the Public Service Commission, BellSouthAT&T will agree to undergo a SEEM audit. Unless otherwise agreed between AT&T and the Public Service Commission, the audit should be conducted by an independent third party auditor. The results of audits will be made</p>		Area for further negotiations by parties.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>available to all the parties subject to proper safeguards to protect proprietary information. Audits will be conducted under the following specifications:</p> <p>Rationale: To address concerns of CLEC.</p>		
4.9S.1.1	<p>The cost of one audit per version of the SEEM plan shall be borne by BellSouthAT&T.</p> <p>Rationale: AT&T's exposure to the high cost associated with an audit should be limited.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
4.9S.1.2	<p>Should an independent third party auditor be required, it shall be selected by BellSouthAT&T and the PSC.</p> <p>Rationale: As AT&T has financial responsibility for an audit, then AT&T should be allowed to select the third party auditor.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
4.409	Dispute Resolution		
4.409.1	<p>Notwithstanding any other provision of the Interconnection Agreement between BellSouthAT&T and each CLEC, if a any-dispute arises regarding BellSouth'sAT&T's performance or obligations pursuant to this Plan, BellSouthAT&T and the CLEC shall negotiate in good faith for a period of thirty (30) days to resolve the dispute. If at the conclusion of the 30 day period, BellSouthAT&T and the CLEC are unable to reach a resolution, then the dispute shall be resolved by the Commission.</p> <p>Rationale: Administrative correction of a typing error in prior version</p>		Parties Agree.
4.410	<p>Regional and State Coefficients</p> <p>Some metrics are calculated for the entire BellSouth-AT&T Southeast region, rather than by state. Where these metrics are a Tier-1/Tier-1 SEEM submetric, a regional coefficient is calculated to determine the amount of the remedy for the CLEC in each state. For example, the Acknowledgement-Completeness-Percent Flow-Through Service Requests Measurement can be measured/evaluated for an individual CLEC, but</p>		Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

only at the regional level. In several states it is also a ~~Tier 1~~^{Tier 1} SEEM submetric. Thus, if there is a failure in this measurement for a CLEC, it is necessary to determine the amount of remedy for the CLEC in each state. A Regional Coefficient is used to do this. (Appendix E, Section E.6-4 describes the method of calculating the Regional Coefficients.) The amount of ~~Tier~~ remedy for the CLEC in a state is determined by multiplying the regional affected volume by the Coefficient for the state and by the state fee.

A state coefficient is calculated to split Tier 2 payments for regional metrics among states by submetric.

Rationale:

Change the calculation of Tier 2 SEEM metrics to allow for removal of O-2 (AKC) Acknowledgment Completeness measure

Metric is evaluated at the regional level. Coefficients are applied to the data for measurement at the regional level for this metric.

State Coefficients are specific to measures with regional scope.

Eliminate reference to Tier 2

Rationale for elimination of Tier 2 and state in proposed changes to SQM document.

Appendix A	Fee Schedule		
------------	--------------	--	--

Table 1:

Table 1: Fee Schedule for ~~Tier 1~~^{Tier 1} Per Transaction Fee Determination

Performance Measure	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
OSS/Pre-Ordering	\$10	\$15	\$20	\$25	\$30	\$35
Ordering	\$20	\$25	\$30	\$35	\$40	\$45
Service Order Accuracy	\$20	\$20	\$20	\$20	\$20	\$20
Flow	\$40	\$45	\$50	\$55	\$60	\$65

Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination

Performance Measure	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6*
OSS/Pre-Ordering	\$10	\$15	\$20	\$25	\$30	\$35
Ordering	\$20	\$25	\$30	\$35	\$40	\$45
Service Order Accuracy	\$20	\$20	\$20	\$20	\$20	\$20

Area to be subject of PSC Workshop and ultimately staff recommendation.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<table border="1"> <tr> <td>Through</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Provisioning - Resale</td> <td>\$40</td> <td>\$50</td> <td>\$70</td> <td>\$100</td> <td>\$130</td> <td>\$200</td> </tr> <tr> <td>Provisioning - UNE</td> <td>\$115</td> <td>\$130</td> <td>\$145</td> <td>\$160</td> <td>\$190</td> <td>\$230</td> </tr> <tr> <td>Maintenance and Repair - Resale</td> <td>\$40</td> <td>\$50</td> <td>\$70</td> <td>\$100</td> <td>\$130</td> <td>\$200</td> </tr> <tr> <td>Maintenance and Repair - UNE</td> <td>\$115</td> <td>\$130</td> <td>\$145</td> <td>\$160</td> <td>\$190</td> <td>\$230</td> </tr> <tr> <td>LNP</td> <td>\$115</td> <td>\$190</td> <td>\$385</td> <td>\$460</td> <td>\$535</td> <td>\$615</td> </tr> <tr> <td>Billing - BIA (see Note 1)</td> <td>2%</td> <td>2%</td> <td>2%</td> <td>2%</td> <td>2%</td> <td>2%</td> </tr> <tr> <td>Billing - BIT</td> <td>\$7</td> <td>\$7</td> <td>\$7</td> <td>\$7</td> <td>\$7</td> <td>\$7</td> </tr> <tr> <td>Billing - BUDT (see Note 2)</td> <td>\$0.046</td> <td>\$0.046</td> <td>\$0.046</td> <td>\$0.046</td> <td>\$0.046</td> <td>\$0.046</td> </tr> <tr> <td>Billing - BEC (see note 3)</td> <td>\$0.07</td> <td>\$0.07</td> <td>\$0.07</td> <td>\$0.07</td> <td>\$0.07</td> <td>\$0.07</td> </tr> <tr> <td>IC Trunks (Trunk Group Performance)</td> <td>\$25</td> <td>\$30</td> <td>\$45</td> <td>\$65</td> <td>\$80</td> <td>\$125</td> </tr> <tr> <td>Collocation</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> </tr> </table> <p>Note 1: Reflects percent interest to be paid on adjusted amounts.</p>	Through							Provisioning - Resale	\$40	\$50	\$70	\$100	\$130	\$200	Provisioning - UNE	\$115	\$130	\$145	\$160	\$190	\$230	Maintenance and Repair - Resale	\$40	\$50	\$70	\$100	\$130	\$200	Maintenance and Repair - UNE	\$115	\$130	\$145	\$160	\$190	\$230	LNP	\$115	\$190	\$385	\$460	\$535	\$615	Billing - BIA (see Note 1)	2%	2%	2%	2%	2%	2%	Billing - BIT	\$7	\$7	\$7	\$7	\$7	\$7	Billing - BUDT (see Note 2)	\$0.046	\$0.046	\$0.046	\$0.046	\$0.046	\$0.046	Billing - BEC (see note 3)	\$0.07	\$0.07	\$0.07	\$0.07	\$0.07	\$0.07	IC Trunks (Trunk Group Performance)	\$25	\$30	\$45	\$65	\$80	\$125	Collocation	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165	<table border="1"> <tr> <td>Flow Through</td> <td>\$40</td> <td>\$45</td> <td>\$50</td> <td>\$55</td> <td>\$60</td> <td>\$65</td> </tr> <tr> <td>Provisioning - Resale</td> <td>\$40</td> <td>\$50</td> <td>\$70</td> <td>\$100</td> <td>\$130</td> <td>\$200</td> </tr> <tr> <td>Provisioning - UNE</td> <td>\$115</td> <td>\$130</td> <td>\$145</td> <td>\$160</td> <td>\$190</td> <td>\$230</td> </tr> <tr> <td>Maintenance and Repair - Resale</td> <td>\$40</td> <td>\$50</td> <td>\$70</td> <td>\$100</td> <td>\$130</td> <td>\$200</td> </tr> <tr> <td>Maintenance and Repair - UNE</td> <td>\$115</td> <td>\$130</td> <td>\$145</td> <td>\$160</td> <td>\$190</td> <td>\$230</td> </tr> <tr> <td>LNP</td> <td>\$115</td> <td>\$190</td> <td>\$385</td> <td>\$460</td> <td>\$535</td> <td>\$615</td> </tr> <tr> <td>Billing - BIA (see Note 1)</td> <td>2%</td> <td>2%</td> <td>2%</td> <td>2%</td> <td>2%</td> <td>2%</td> </tr> <tr> <td>Billing - BIT</td> <td>\$157</td> <td>\$157</td> <td>\$157</td> <td>\$157</td> <td>\$157</td> <td>\$157</td> </tr> <tr> <td>Billing - BUDT (see Note 2)</td> <td>\$0.15046</td> <td>\$0.15046</td> <td>\$0.15046</td> <td>\$0.15046</td> <td>\$0.15046</td> <td>\$0.15046</td> </tr> <tr> <td>Billing - BEC (see note 3)</td> <td>\$50.000447</td> <td>\$50.000447</td> <td>\$50.000447</td> <td>\$50.000447</td> <td>\$50.000447</td> <td>\$50.000447</td> </tr> <tr> <td>IC Trunks (Trunk Group Performance)</td> <td>\$25</td> <td>\$30</td> <td>\$45</td> <td>\$65</td> <td>\$80</td> <td>\$125</td> </tr> <tr> <td>Collocation</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> <td>\$3,165</td> </tr> </table> <p>Note 1: Reflects percent interest to be paid on adjusted amounts.</p>	Flow Through	\$40	\$45	\$50	\$55	\$60	\$65	Provisioning - Resale	\$40	\$50	\$70	\$100	\$130	\$200	Provisioning - UNE	\$115	\$130	\$145	\$160	\$190	\$230	Maintenance and Repair - Resale	\$40	\$50	\$70	\$100	\$130	\$200	Maintenance and Repair - UNE	\$115	\$130	\$145	\$160	\$190	\$230	LNP	\$115	\$190	\$385	\$460	\$535	\$615	Billing - BIA (see Note 1)	2%	2%	2%	2%	2%	2%	Billing - BIT	\$157	\$157	\$157	\$157	\$157	\$157	Billing - BUDT (see Note 2)	\$0.15046	\$0.15046	\$0.15046	\$0.15046	\$0.15046	\$0.15046	Billing - BEC (see note 3)	\$50.000447	\$50.000447	\$50.000447	\$50.000447	\$50.000447	\$50.000447	IC Trunks (Trunk Group Performance)	\$25	\$30	\$45	\$65	\$80	\$125	Collocation	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165	
Through																																																																																																																																																																											
Provisioning - Resale	\$40	\$50	\$70	\$100	\$130	\$200																																																																																																																																																																					
Provisioning - UNE	\$115	\$130	\$145	\$160	\$190	\$230																																																																																																																																																																					
Maintenance and Repair - Resale	\$40	\$50	\$70	\$100	\$130	\$200																																																																																																																																																																					
Maintenance and Repair - UNE	\$115	\$130	\$145	\$160	\$190	\$230																																																																																																																																																																					
LNP	\$115	\$190	\$385	\$460	\$535	\$615																																																																																																																																																																					
Billing - BIA (see Note 1)	2%	2%	2%	2%	2%	2%																																																																																																																																																																					
Billing - BIT	\$7	\$7	\$7	\$7	\$7	\$7																																																																																																																																																																					
Billing - BUDT (see Note 2)	\$0.046	\$0.046	\$0.046	\$0.046	\$0.046	\$0.046																																																																																																																																																																					
Billing - BEC (see note 3)	\$0.07	\$0.07	\$0.07	\$0.07	\$0.07	\$0.07																																																																																																																																																																					
IC Trunks (Trunk Group Performance)	\$25	\$30	\$45	\$65	\$80	\$125																																																																																																																																																																					
Collocation	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165																																																																																																																																																																					
Flow Through	\$40	\$45	\$50	\$55	\$60	\$65																																																																																																																																																																					
Provisioning - Resale	\$40	\$50	\$70	\$100	\$130	\$200																																																																																																																																																																					
Provisioning - UNE	\$115	\$130	\$145	\$160	\$190	\$230																																																																																																																																																																					
Maintenance and Repair - Resale	\$40	\$50	\$70	\$100	\$130	\$200																																																																																																																																																																					
Maintenance and Repair - UNE	\$115	\$130	\$145	\$160	\$190	\$230																																																																																																																																																																					
LNP	\$115	\$190	\$385	\$460	\$535	\$615																																																																																																																																																																					
Billing - BIA (see Note 1)	2%	2%	2%	2%	2%	2%																																																																																																																																																																					
Billing - BIT	\$157	\$157	\$157	\$157	\$157	\$157																																																																																																																																																																					
Billing - BUDT (see Note 2)	\$0.15046	\$0.15046	\$0.15046	\$0.15046	\$0.15046	\$0.15046																																																																																																																																																																					
Billing - BEC (see note 3)	\$50.000447	\$50.000447	\$50.000447	\$50.000447	\$50.000447	\$50.000447																																																																																																																																																																					
IC Trunks (Trunk Group Performance)	\$25	\$30	\$45	\$65	\$80	\$125																																																																																																																																																																					
Collocation	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165	\$3,165																																																																																																																																																																					

SEFM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	Note 2: Amount paid per 1000 usage records. Note 3: Amount paid per dispute. Rationale: Reference to Tier 2 is not appropriate for Tier 1 of Bill of Materials.	Note 2: Amount paid per 1000 usage records. Note 3: Amount paid per dispute. Rationale: Reference to Tier 2 is not appropriate for Tier 1 of Bill of Materials.	
--	--	--	--

Table 2	<p>Table 2: Tier 2 Per Transaction Fee Determination</p> <table border="1"> <thead> <tr> <th rowspan="2">Measure</th> <th colspan="3">Retail Analogs</th> <th rowspan="2">Benchmarks</th> </tr> <tr> <th>BCV</th> <th>Between</th> <th>Below</th> </tr> </thead> <tbody> <tr> <td>OSS-Pre Ordering (note 1)</td> <td>\$6</td> <td>-</td> <td>-</td> <td>\$30</td> </tr> <tr> <td>Ordering- Average</td> <td>\$6</td> <td>-</td> <td>-</td> <td>\$60</td> </tr> <tr> <td>Ordering</td> <td>-</td> <td>-</td> <td>-</td> <td>\$60</td> </tr> <tr> <td>Service Order Accuracy</td> <td>-</td> <td>-</td> <td>-</td> <td>\$60</td> </tr> <tr> <td>Flow Through</td> <td>-</td> <td>-</td> <td>-</td> <td>\$120</td> </tr> <tr> <td>Provisioning - Resale</td> <td>\$26</td> <td>\$120</td> <td>-</td> <td>-</td> </tr> <tr> <td>Provisioning - UNE</td> <td>\$76</td> <td>\$345</td> <td>\$345</td> <td>-</td> </tr> <tr> <td>Maintenance and Repair</td> <td>\$26</td> <td>\$120</td> <td>-</td> <td>-</td> </tr> <tr> <td>Maintenance and Repair - UNE</td> <td>\$76</td> <td>\$345</td> <td>-</td> <td>-</td> </tr> <tr> <td>Maintenance and Repair - Resale</td> <td>\$26</td> <td>\$120</td> <td>-</td> <td>-</td> </tr> <tr> <td>Maintenance and Repair - UNE</td> <td>\$76</td> <td>\$345</td> <td>-</td> <td>-</td> </tr> <tr> <td>LNP</td> <td>\$36</td> <td>\$165</td> <td>-</td> <td>-</td> </tr> <tr> <td>Billing - BIA (note 1)</td> <td>1.3%</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Billing - BIT (note 1)</td> <td>\$4</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Billing - BUDT (note 1)</td> <td>\$0.03</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Billing - BEC (note 1)</td> <td>\$0.04</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Change Management</td> <td>-</td> <td>-</td> <td>-</td> <td>\$1,000</td> </tr> <tr> <td>IC Trunks (Trunk Group Collocation)</td> <td>\$16</td> <td>\$75</td> <td>\$75</td> <td>\$9,495</td> </tr> </tbody> </table> <p>Note 1: The truncated Z does not apply to these measures</p> <p>Rationale: Eliminate reference to Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>	Measure	Retail Analogs			Benchmarks	BCV	Between	Below	OSS-Pre Ordering (note 1)	\$6	-	-	\$30	Ordering- Average	\$6	-	-	\$60	Ordering	-	-	-	\$60	Service Order Accuracy	-	-	-	\$60	Flow Through	-	-	-	\$120	Provisioning - Resale	\$26	\$120	-	-	Provisioning - UNE	\$76	\$345	\$345	-	Maintenance and Repair	\$26	\$120	-	-	Maintenance and Repair - UNE	\$76	\$345	-	-	Maintenance and Repair - Resale	\$26	\$120	-	-	Maintenance and Repair - UNE	\$76	\$345	-	-	LNP	\$36	\$165	-	-	Billing - BIA (note 1)	1.3%	-	-	-	Billing - BIT (note 1)	\$4	-	-	-	Billing - BUDT (note 1)	\$0.03	-	-	-	Billing - BEC (note 1)	\$0.04	-	-	-	Change Management	-	-	-	\$1,000	IC Trunks (Trunk Group Collocation)	\$16	\$75	\$75	\$9,495	<p>Table 2: Tier 2 Per Transaction Fee Determination</p> <table border="1"> <thead> <tr> <th rowspan="2">Measure</th> <th colspan="3">Retail Analogs</th> <th rowspan="2">Benchmarks</th> </tr> <tr> <th>BCV not Applicable</th> <th>Between BCV and 0</th> <th>Below BCV</th> </tr> </thead> <tbody> <tr> <td>OSS Pre Ordering (note 1)</td> <td>\$6</td> <td>-</td> <td>-</td> <td>\$30</td> </tr> <tr> <td>Ordering- Average Answer Time (OAT) (note 1)</td> <td>\$6</td> <td>-</td> <td>-</td> <td>\$60</td> </tr> <tr> <td>Ordering</td> <td>-</td> <td>-</td> <td>-</td> <td>\$60</td> </tr> <tr> <td>Service Order Accuracy</td> <td>-</td> <td>-</td> <td>-</td> <td>\$60</td> </tr> <tr> <td>Flow Through</td> <td>-</td> <td>-</td> <td>-</td> <td>\$120</td> </tr> <tr> <td>Provisioning - Resale</td> <td>-</td> <td>\$26</td> <td>\$120</td> <td>-</td> </tr> <tr> <td>Provisioning - UNE</td> <td>-</td> <td>\$76</td> <td>\$345</td> <td>\$345</td> </tr> <tr> <td>Maintenance and Repair - Resale</td> <td>-</td> <td>\$26</td> <td>\$120</td> <td>-</td> </tr> <tr> <td>Maintenance and Repair - UNE</td> <td>-</td> <td>\$76</td> <td>\$345</td> <td>-</td> </tr> <tr> <td>Maintenance and Repair - Resale</td> <td>-</td> <td>\$36</td> <td>\$165</td> <td>-</td> </tr> <tr> <td>Maintenance and Repair - UNE</td> <td>-</td> <td>\$76</td> <td>\$345</td> <td>-</td> </tr> <tr> <td>LNP</td> <td>-</td> <td>\$36</td> <td>\$165</td> <td>-</td> </tr> <tr> <td>Billing - BIA (note 1)</td> <td>1.3%</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Billing - BIT (note 1)</td> <td>\$4</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Billing - BUDT (note 1)</td> <td>\$0.03</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Billing - BEC (note 1)</td> <td>\$0.04</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Change Management</td> <td>-</td> <td>-</td> <td>-</td> <td>\$1,000</td> </tr> <tr> <td>IC Trunks (Trunk Group Performance)</td> <td>-</td> <td>\$16</td> <td>\$75</td> <td>\$75</td> </tr> <tr> <td>Collocation</td> <td>-</td> <td>-</td> <td>-</td> <td>\$9,495</td> </tr> </tbody> </table>	Measure	Retail Analogs			Benchmarks	BCV not Applicable	Between BCV and 0	Below BCV	OSS Pre Ordering (note 1)	\$6	-	-	\$30	Ordering- Average Answer Time (OAT) (note 1)	\$6	-	-	\$60	Ordering	-	-	-	\$60	Service Order Accuracy	-	-	-	\$60	Flow Through	-	-	-	\$120	Provisioning - Resale	-	\$26	\$120	-	Provisioning - UNE	-	\$76	\$345	\$345	Maintenance and Repair - Resale	-	\$26	\$120	-	Maintenance and Repair - UNE	-	\$76	\$345	-	Maintenance and Repair - Resale	-	\$36	\$165	-	Maintenance and Repair - UNE	-	\$76	\$345	-	LNP	-	\$36	\$165	-	Billing - BIA (note 1)	1.3%	-	-	-	Billing - BIT (note 1)	\$4	-	-	-	Billing - BUDT (note 1)	\$0.03	-	-	-	Billing - BEC (note 1)	\$0.04	-	-	-	Change Management	-	-	-	\$1,000	IC Trunks (Trunk Group Performance)	-	\$16	\$75	\$75	Collocation	-	-	-	\$9,495	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
Measure	Retail Analogs			Benchmarks																																																																																																																																																																																																								
	BCV	Between	Below																																																																																																																																																																																																									
OSS-Pre Ordering (note 1)	\$6	-	-	\$30																																																																																																																																																																																																								
Ordering- Average	\$6	-	-	\$60																																																																																																																																																																																																								
Ordering	-	-	-	\$60																																																																																																																																																																																																								
Service Order Accuracy	-	-	-	\$60																																																																																																																																																																																																								
Flow Through	-	-	-	\$120																																																																																																																																																																																																								
Provisioning - Resale	\$26	\$120	-	-																																																																																																																																																																																																								
Provisioning - UNE	\$76	\$345	\$345	-																																																																																																																																																																																																								
Maintenance and Repair	\$26	\$120	-	-																																																																																																																																																																																																								
Maintenance and Repair - UNE	\$76	\$345	-	-																																																																																																																																																																																																								
Maintenance and Repair - Resale	\$26	\$120	-	-																																																																																																																																																																																																								
Maintenance and Repair - UNE	\$76	\$345	-	-																																																																																																																																																																																																								
LNP	\$36	\$165	-	-																																																																																																																																																																																																								
Billing - BIA (note 1)	1.3%	-	-	-																																																																																																																																																																																																								
Billing - BIT (note 1)	\$4	-	-	-																																																																																																																																																																																																								
Billing - BUDT (note 1)	\$0.03	-	-	-																																																																																																																																																																																																								
Billing - BEC (note 1)	\$0.04	-	-	-																																																																																																																																																																																																								
Change Management	-	-	-	\$1,000																																																																																																																																																																																																								
IC Trunks (Trunk Group Collocation)	\$16	\$75	\$75	\$9,495																																																																																																																																																																																																								
Measure	Retail Analogs			Benchmarks																																																																																																																																																																																																								
	BCV not Applicable	Between BCV and 0	Below BCV																																																																																																																																																																																																									
OSS Pre Ordering (note 1)	\$6	-	-	\$30																																																																																																																																																																																																								
Ordering- Average Answer Time (OAT) (note 1)	\$6	-	-	\$60																																																																																																																																																																																																								
Ordering	-	-	-	\$60																																																																																																																																																																																																								
Service Order Accuracy	-	-	-	\$60																																																																																																																																																																																																								
Flow Through	-	-	-	\$120																																																																																																																																																																																																								
Provisioning - Resale	-	\$26	\$120	-																																																																																																																																																																																																								
Provisioning - UNE	-	\$76	\$345	\$345																																																																																																																																																																																																								
Maintenance and Repair - Resale	-	\$26	\$120	-																																																																																																																																																																																																								
Maintenance and Repair - UNE	-	\$76	\$345	-																																																																																																																																																																																																								
Maintenance and Repair - Resale	-	\$36	\$165	-																																																																																																																																																																																																								
Maintenance and Repair - UNE	-	\$76	\$345	-																																																																																																																																																																																																								
LNP	-	\$36	\$165	-																																																																																																																																																																																																								
Billing - BIA (note 1)	1.3%	-	-	-																																																																																																																																																																																																								
Billing - BIT (note 1)	\$4	-	-	-																																																																																																																																																																																																								
Billing - BUDT (note 1)	\$0.03	-	-	-																																																																																																																																																																																																								
Billing - BEC (note 1)	\$0.04	-	-	-																																																																																																																																																																																																								
Change Management	-	-	-	\$1,000																																																																																																																																																																																																								
IC Trunks (Trunk Group Performance)	-	\$16	\$75	\$75																																																																																																																																																																																																								
Collocation	-	-	-	\$9,495																																																																																																																																																																																																								

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

Table 2: Maximum Remedy for Tier-1 Measures with a Cap (Applies to FOCT, FT, RI, SOA and TGP)	<table border="1"> <thead> <tr> <th><u>Perform</u> <u>ance</u> <u>Measure</u></th> <th><u>Month</u> <u>1</u></th> <th><u>Mont</u> <u>h 2</u></th> <th><u>Mon</u> <u>th 3</u></th> <th><u>Mont</u> <u>h 4</u></th> <th><u>Month</u> <u>5</u></th> <th><u>Month</u> <u>6</u></th> </tr> </thead> <tbody> <tr> <td>All Measures with a Cap</td> <td>\$10,000</td> <td>\$20,000</td> <td>\$30,000</td> <td>\$40,000</td> <td>\$50,000</td> <td>\$60,000</td> </tr> </tbody> </table>	<u>Perform</u> <u>ance</u> <u>Measure</u>	<u>Month</u> <u>1</u>	<u>Mont</u> <u>h 2</u>	<u>Mon</u> <u>th 3</u>	<u>Mont</u> <u>h 4</u>	<u>Month</u> <u>5</u>	<u>Month</u> <u>6</u>	All Measures with a Cap	\$10,000	\$20,000	\$30,000	\$40,000	\$50,000	\$60,000		Area to be subject of PSC Workshop and ultimately staff recommendation.
	<u>Perform</u> <u>ance</u> <u>Measure</u>	<u>Month</u> <u>1</u>	<u>Mont</u> <u>h 2</u>	<u>Mon</u> <u>th 3</u>	<u>Mont</u> <u>h 4</u>	<u>Month</u> <u>5</u>	<u>Month</u> <u>6</u>										
All Measures with a Cap	\$10,000	\$20,000	\$30,000	\$40,000	\$50,000	\$60,000											
<p>Rationale:</p> <p>Investment remedy caps for Tier-1 for high volume entities and those associated with EIS submissions and processing.</p> <p>Measurements are not significant regarding meeting service commitments to CLECs and users.</p> <p>SF-EM remedy should be proportionate to level of failure.</p>																	

Appendix B	SEEM Submetrics		
-------------------	------------------------	--	--

B.1 Tier-1/Tier-1 Submetrics	<table border="1"> <thead> <tr> <th><u>Item No.</u></th> <th><u>SQM Ref</u></th> <th><u>Tier-1/Tier-1 Submetric</u></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>LMF</td> <td>PO-2 Loop Makeup—Response Time—Electronic—Loop</td> </tr> <tr> <td>2</td> <td>AKC</td> <td>O-2 Acknowledgement Message Completeness—Acknowledgments</td> </tr> <tr> <td>3</td> <td>FT</td> <td>O-3 Percent Flow-Through Service Requests—Business</td> </tr> <tr> <td>4</td> <td>FT</td> <td>O-3 Percent Flow-Through Service</td> </tr> </tbody> </table>	<u>Item No.</u>	<u>SQM Ref</u>	<u>Tier-1/Tier-1 Submetric</u>	1	LMF	PO-2 Loop Makeup—Response Time—Electronic—Loop	2	AKC	O-2 Acknowledgement Message Completeness—Acknowledgments	3	FT	O-3 Percent Flow-Through Service Requests—Business	4	FT	O-3 Percent Flow-Through Service	B.1 Tier 1 Submetrics [ADDED TO EXISTING TABLE B.1] <table border="1"> <tbody> <tr> <td>OSS-1</td> <td>[AR]</td> <td>OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)</td> </tr> <tr> <td>O-12</td> <td>[OAA]</td> <td>Average Answer Time-Ordering</td> </tr> </tbody> </table>	OSS-1	[AR]	OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)	O-12	[OAA]	Average Answer Time-Ordering	Area to be subject of PSC Workshop and ultimately staff recommendation.
	<u>Item No.</u>	<u>SQM Ref</u>	<u>Tier-1/Tier-1 Submetric</u>																					
	1	LMF	PO-2 Loop Makeup—Response Time—Electronic—Loop																					
	2	AKC	O-2 Acknowledgement Message Completeness—Acknowledgments																					
	3	FT	O-3 Percent Flow-Through Service Requests—Business																					
4	FT	O-3 Percent Flow-Through Service																						
OSS-1	[AR]	OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)																						
O-12	[OAA]	Average Answer Time-Ordering																						

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

		Requests—LNP			Centers	
3	RI	O-3 Percent Flow Through Service Requests—Residence		P-5	[CNI]	Average Completion Notice Interval
4	RI	O-3 Percent Flow Through Service Requests—LNE-L (includes LNE-L with LNP)		CM-1	[NT]	Timeliness of Change Management Notices
5	RI	O-8 Reject Interval – Fully Mechanized		CM-3	[DT]	Timeliness of Documentation Associated with Change
6	RI	O-8 Reject Interval – Partially Mechanized		CM-5	[ION]	Notification of CLEC Interface Outages
7	RI	O-8 Reject Interval – Non Mechanized		CM-6	[SEC]	Percentage of Software Errors Corrected in "X" Business Days
8	FOCT	O-9 Firm Order Confirmation Timeliness - Fully Mechanized		CM-7	[CRA]	Percentage of Change Requests Accepted or Rejected within 10 Business Days
9	FOCT	O-9 Firm Order Confirmation Timeliness - Partially Mechanized		CM-8	[CRR]	Percent Change Requests Rejected
10	FOCT	O-9 Firm Order Confirmation Timeliness - Non Mechanized		CM-11	[SCR]	Percentage of Software Change Requests Implemented with 60 days of Prioritization
11	FOCC	O-11 FOC & Reject Response Completeness—Fully Mechanized				Average Time Required to Update 911 Database (Facility Based Providers)
12	FOCC	O-11 FOC & Reject Response Completeness—Partially Mechanized				Per Cent Database Accuracy
13	FOCC	O-11 FOC & Reject Response Completeness—Non Mechanized				911 Average Time to Clear Errors
14	MIA	P-3 Percent Missed Installation Appointments – Resale POTS				

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	MIA	P-3 Percent Missed Installation Appointments - Resale Design	Percentage of Updates Completed into the DA Database within 72 hours for Facility Based CLECs	
	MIA	P-3 Percent Missed Installation Appointments - UNE Loops - Design		
	MIA	P-3 Percent Missed Installation Appointments - UNE Loops - Non-Design		
	MIA	P-3 Percent Missed Installation Appointments - UNE xDSL and Line Splitting		
22	MIA	P-3 Percent Missed Installation Appointments - UNE Line Splitting		
21	MIA	P-3 Percent Missed Installation Appointments - LNP Standalone		
21	MIA	P-3 Percent Missed Installation Appointments - Local Interconnection Trunks		
25	OCI	P-4 Order Completion Interval (OCI) - Resale POFS		Directory Assistance-Database Update Accuracy
26	OCI	P-4 Order Completion Interval (OCI) - Resale Design		
27	OCI	P-4 Order Completion Interval (OCI) - UNE Loop Design		
28	OCI	P-4 Order Completion Interval (OCI) - UNE Loop Non-Design		
29	OCI	P-4 Order Completion Interval (OCI) - UNE xDSL - without conditioning		
30	OCI	P-4 Order Completion Interval (OCI) - UNE xDSL - with conditioning		
		OSS-2	[IA]	OSS Interface Availability (Pre-Ordering Ordering Maintenance & Repair)
		P-2A	[P,48]	Percentage of Orders Given Jeopardy Notices > - 48 Hours
		C-2	[AT]	Collocation Average Arrangement Time

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

31	OCI	P-4 Order Completion Interval (OCI) - UNE Line Splitting Dispatch		
32	OCI	P-4 Order Completion Interval (OCI) - UNE Line Splitting Non-Dispatch		
33	OCI	P-4 Order Completion Interval (OCI) - Local Interconnection Trunks		
34	OCI	P-4 Order Completion Interval (OCI) - UNE LELS		
P-7	CCI	P-7 Coordinated Customer Conversions - Hot Cut Durations		
P-7A	CCT	P-7A Coordinated Customer Conversions - Hot Cut Timeliness Percent within Interval		
P-7D	NCDD	P-7D Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date		
P-9	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion - Resale POTS		
P-9	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion - Resale Design		
P-9	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion - UNE Loops - Design		
P-9	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion - UNE Loops - Non-Design		
P-9	PPT	P-9 Percent Provisioning Troubles within X days of Service Order		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		Completion – UNE xDSL and Line Splitting	
	13	PPI	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE Line Splitting – Dispatch
	14	PPI	P-9 Percent Provisioning Troubles within X days of Service Order Completion – UNE Line Splitting – Non-Dispatch
	15	PPT	P-9 Percent Provisioning Troubles within X days of Service Order Completion – Local Interconnection Trunks
	16	SOA	P-11 Service Order Accuracy - Resale
	17	SOA	P-11 Service Order Accuracy – UNE
	18	LOOS	P-13B LNP – Percent Out of Service < 60 Minutes - LNP
	19	LAT	P-13C LNP Percent of Time BellSouth/AT&T Applies the 10-Digit Trigger Prior to the LNP Order Due Date – LNP – (Standalone)
	20	LDT	P-13D LNP – Disconnect Timeliness (Non-Trigger)
	21	MRA	MR-1 Percent Missed Repair Appointment - Resale POTS
	22	MRA	MR-1 Percent Missed Repair Appointment – Resale Design
	23	MRA	MR-1 Percent Missed Repair Appointment – UNE Loops Design
	24	MRA	MR-1 Percent Missed Repair Appointment – UNE Loops Non-

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

		Design		
	MRA	MR-1 Percent Missed Repair Appointment - UNE xDSL and Line Splitting		
56	MRA	MR-1 Percent Missed Repair Appointment - UNE Line Splitting		
73	MRA	MR-1 Percent Missed Repair Appointment - Local Interconnection Trunks		
77	CTRR	MR-2 Customer Trouble Report Rate - Resale POTS		
47	CTRR	MR-2 Customer Trouble Report Rate - Resale Design		
77	CTRR	MR-2 Customer Trouble Report Rate - UNE Loops Design		
77	CTRR	MR-2 Customer Trouble Report Rate - UNE Loops Non-Design		
78	CTRR	MR-2 Customer Trouble Report Rate - UNE xDSL and Line Splitting		
63	CTRR	MR-2 Customer Trouble Report Rate - UNE Line Splitting		
77	CTRR	MR-2 Customer Trouble Report Rate - Local Interconnection Trunks		
54	MAD	MR-3 Maintenance Average Duration - Resale POTS		
47	MAD	MR-3 Maintenance Average Duration - Resale Design		
77	MAD	MR-3 Maintenance Average Duration - UNE Loops Design		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	MAD	MR-3 Maintenance Average Duration - UNE Loops Non-Design		
	MAD	MR-3 Maintenance Average Duration - UNE xDSL and Line Splitting		
70	MAD	MR-3 Maintenance Average Duration - UNE Line Splitting		
71	MAD	MR-3 Maintenance Average Duration - Local Interconnection Trunks		
72	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days - Resale POTS		
73	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days - Resale Design		
74	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days - UNE Loops Design		
75	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days - UNE Loops Non-Design		
76	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days - UNE xDSL and Line Splitting		
77	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days - UNE Line Splitting		
78	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days - Local Interconnection Trunks		
79	OOS	MR-5 Out of Service (OOS) > 24 hours - Resale POTS		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

80	OOS	MR-5 Out of Service (OOS) - 24 hours - Resale Design		
81	OOS	MR-5 Out of Service (OOS) - 24 hours - UNE Loops Design		
82	OOS	MR-5 Out of Service (OOS) - 24 hours - UNE Loops Non-Design		
83	OOS	MR-5 Out of Service (OOS) - 24 hours - UNE xDSL and Line Splitting		
84	OOS	MR-5 Out of Service (OOS) - 24 hours - UNE Line Splitting		
85	OOS	MR-5 Out of Service (OOS) - 24 hours - Local Interconnection Trunks		
86	BLA	B-1 Invoice Accuracy		
87	BIT	B-2 Mean Time to Deliver Invoices - CRIS		
88	BIT	B-2 Mean Time to Deliver Invoices - CABS		
89	BUDE	B-5 Usage Data Delivery Timeliness		
90	BEC	B-10 Percent Billing Adjustment Requests (BAR) Responded to within 45 Business Days - State		
152	TGP	TGP Trunk Group Performance		
153	MDD	C-3 Collocation Percent of Due Dates Missed		
Rationale: Refer to metrics for rationale of deleted or changed SQM References				

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

B.2 Tier-2 Sub-metrics	Item No.	SQM Ref	Tier-2 Submetric		Area to be subject of PSC Workshop and ultimately staff recommendation.
	1	ARI	OSS-1 OSS-Response-Interval (Pre-Ordering-Ordering) – LENS-Enhanced Verigate		
2	ARI	OSS-1 OSS-Response-Interval (Pre-Ordering-Ordering) – TAG/XML			
3	ARI	OSS-1 OSS-Response-Interval (Maintenance & Repair)			
4	IA	OSS-2 OSS-Interface-Availability – (Pre-Ordering-Ordering) – Regional per OSS Interface			
5	IA	OSS-2 OSS-Interface-Availability – (Maintenance & Repair) – Regional per OSS Interface			
6	LMF	PO-2 Loop-Makeup – Response-Time – Electronic-Loop			
7	AKC	O-2 Acknowledgement-Message-Completeness – Acknowledgments			
8	FT	O-3 Percent-Flow-Through-Service-Requests – Business			
9	FT	O-3 Percent-Flow-Through-Service-Requests – LNP			
10	FT	O-3 Percent-Flow-Through-Service-Requests – Residence			
11	FT	O-3 Percent-Flow-Through-Service-Requests – UNE-L (includes UNE-L with LNP)			
12	RI	O-8 Reject-Interval – Fully-Mechanized			

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

13	RI	Q-8 Reject Interval—Partially Mechanized		
14	RI	Q-8 Reject Interval—Non Mechanized		
15	FOCF	Q-9 Firm Order Confirmation Timeliness—Fully Mechanized		
16	FOCF	Q-9 Firm Order Confirmation Timeliness—Partially Mechanized		
17	FOCF	Q-9 Firm Order Confirmation Timeliness—Non Mechanized		
18	FOCF	Q-9 Firm Order Confirmation Timeliness—Local Interconnection Trunks		
19	FOCC	Q-11 FOC & Reject Response Completeness—Fully Mechanized		
20	FOCC	Q-11 FOC & Reject Response Completeness—Partially Mechanized		
24	FOCC	Q-11 FOC & Reject Response Completeness—Non Mechanized		
22	OAAI	Q-12 Average Answer Time—Ordering Centers—CLEC Local Carrier Service Center		
23	MIA	P-3 Percent Missed Installation Appointments—Resale POTS		
24	MIA	P-3 Percent Missed Installation Appointments—Resale Design		
25	MIA	P-3 Percent Missed Installation Appointments—UNE Loops—Design		
26	MIA	P-3 Percent Missed Installation Appointments—UNE Loops—Non Design		
27	MIA	P-3 Percent Missed Installation Appointments—UNE xDSL		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments	
28	MLA	P-3 Percent Missed Installation Appointments—UNE Line Splitting		
29	MLA	P-3 Percent Missed Installation Appointments—LNP Standalone		
30	MLA	P-3 Percent Missed Installation Appointments—Local Interconnection Trunks		
34	OCI	P-4 Order Completion Interval (OCI)—Resale POTS		
32	OCI	P-4 Order Completion Interval (OCI)—Resale Design		
33	OCI	P-4 Order Completion Interval (OCI)—UNE Loop Design		
34	OCI	P-4 Order Completion Interval (OCI)—UNE Loop Non-Design		
35	OCI	P-4 Order Completion Interval (OCI)—UNE xDSL—without conditioning		
37	OCI	P-4 Order Completion Interval (OCI)—UNE xDSL—with conditioning		
37	OCI	P-4 Order Completion Interval (OCI)—UNE Line Splitting Dispatch		
38	OCI	P-4 Order Completion Interval (OCI)—UNE Line Splitting—Non-Dispatch		
39	OCI	P-4 Order Completion Interval (OCI)—Local interconnection Trunks		
40	OCI	P-4 Order Completion Interval (OCI)—UNE EFLS		
44	CCI	P-7 Coordinated Customer Conversions—Hot-Cut Durations		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	42	CCF	P-7A Coordinated Customer Conversion— Hot Cut Timeliness Percent within Interval		
	43	NCDD	P-7D Non-Coordinated Customer Conversions— Percent Completed and Notified on Due Date		
	44	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— Resale POTS		
	45	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— Resale Design		
	46	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— UNE Loops— Design		
	47	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— UNE Loops— Non-Design		
	48	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— UNE xDSL		
	49	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— UNE Line Splitting— Dispatch		
	50	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— UNE Line Splitting— Non-Dispatch		
	51	PPF	P-9 Percent Provisioning Troubles within X days of Service Order Completion— Local Interconnection Trunks		
	52	SOA	P-11 Service Order Accuracy— Resale		
	53	SOA	P-11 Service Order Accuracy— UNE		
	54	LOOS	P-13B LNP— Percent Out of Service < 60		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

		Minutes - LNP		
55	LAI	P-13C LNP Percent of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date - LNP - (Standalone)		
56	LDF	P-13D LNP - Disconnect Timeliness (Non-Trigger)		
57	MRA	MR-1 Percent Missed Repair Appointment - Resale POTS		
58	MRA	MR-1 Percent Missed Repair Appointment - Resale Design		
59	MRA	MR-1 Percent Missed Repair Appointment - UNE Loops Design		
60	MRA	MR-1 Percent Missed Repair Appointment - UNE Loops Non-Design		
61	MRA	MR-1 Percent Missed Repair Appointment - UNE xDSL		
62	MRA	MR-1 Percent Missed Repair Appointment - UNE Line Splitting		
63	MRA	MR-1 Percent Missed Repair Appointment - Local Interconnection Trunks		
64	CTRR	MR-2 Customer Trouble Report Rate - Resale POTS		
65	CTRR	MR-2 Customer Trouble Report Rate - Resale Design		
66	CTRR	MR-2 Customer Trouble Report Rate - UNE Loops Design		
67	CTRR	MR-2 Customer Trouble Report Rate - UNE Loops Non-Design		
68	CTRR	MR-2 Customer Trouble Report Rate - UNE xDSL		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

69	CTRR	MR-2 Customer Trouble Report Rate—UNE Line Splitting		
70	CTRR	MR-2 Customer Trouble Report Rate—Local Interconnection Trunks		
71	MAD	MR-3 Maintenance Average Duration—Resale POTS		
72	MAD	MR-3 Maintenance Average Duration—Resale Design		
73	MAD	MR-3 Maintenance Average Duration—UNE Loops Design		
74	MAD	MR-3 Maintenance Average Duration—UNE Loops Non-Design		
75	MAD	MR-3 Maintenance Average Duration—UNE xDSL		
76	MAD	MR-3 Maintenance Average Duration—UNE Line Splitting		
77	MAD	MR-3 Maintenance Average Duration—Local Interconnection Trunks		
78	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days—Resale POTS		
79	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days—Resale Design		
80	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days—UNE Loops Design		
81	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days—UNE Loops Non-Design		
82	PRT	MR-4 Percent Repeat Customer Troubles within 30 Days—UNE xDSL		
83	PRT	MR-4 Percent Repeat Customer Troubles		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

		within 30 Days — UNE Line Splitting	
84	PR-1	MR-4 Percent Repeat Customer Troubles within 30 Days — Local Interconnection Trunks	
85	OOS	MR-5 Out of Service (OOS) > 24 hours — Resale POTS	
86	OOS	MR-5 Out of Service (OOS) > 24 hours — Resale Design	
87	OOS	MR-5 Out of Service (OOS) > 24 hours — UNE Loops Design	
88	OOS	MR-5 Out of Service (OOS) > 24 hours — UNE Loops Non-Design	
89	OOS	MR-5 Out of Service (OOS) > 24 hours — UNE xDSL	
90	OOS	MR-5 Out of Service (OOS) > 24 hours — UNE Line Splitting	
91	OOS	MR-5 Out of Service (OOS) > 24 hours — Local Interconnection Trunks	
92	BIA	B-1 Invoice Accuracy	
93	BIT	B-2 Mean Time to Deliver Invoices — CRIS	
94	BIT	B-2 Mean Time to Deliver Invoices — CABS	
95	BUDT	B-5 Usage Data Delivery Timeliness	
96	BEC	B-10 Percent Billing Adjustment Requests (BAR) Responded to within 45 Business Days — State	
97	TGP	TGP Trunk Group Performance	
98	MDD	C-3 Collocation Percent of Due Dates Missed	

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<table border="1"> <tr> <td data-bbox="317 191 389 289">100</td> <td data-bbox="389 191 577 289">N4</td> <td data-bbox="577 191 1061 289">CM-1 Timeliness of Change Management Notices—Region</td> </tr> <tr> <td data-bbox="317 289 389 371">100</td> <td data-bbox="389 289 577 371">DF</td> <td data-bbox="577 289 1061 371">CM-3 Timeliness of Documentation Associated with Change—Region</td> </tr> <tr> <td data-bbox="317 371 389 470">104</td> <td data-bbox="389 371 577 470">SEC</td> <td data-bbox="577 371 1061 470">CM-6 Percentage of Software Errors Corrected in "X" Business Days—Region</td> </tr> <tr> <td data-bbox="317 470 389 586">102</td> <td data-bbox="389 470 577 586">CRA</td> <td data-bbox="577 470 1061 586">CM-7 Percentage of Change Requests Accepted or Rejected Within 10 Days—Region</td> </tr> <tr> <td data-bbox="317 586 389 702">103</td> <td data-bbox="389 586 577 702">SCR1</td> <td data-bbox="577 586 1061 702">CM-11 Percentage of Software Change Requests Implemented Within 60 Weeks of Prioritization—Region</td> </tr> <tr> <td colspan="3" data-bbox="317 702 1061 1007"> <p>Rationale Elimination of Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM document</p> </td> </tr> </table>	100	N4	CM-1 Timeliness of Change Management Notices—Region	100	DF	CM-3 Timeliness of Documentation Associated with Change—Region	104	SEC	CM-6 Percentage of Software Errors Corrected in "X" Business Days—Region	102	CRA	CM-7 Percentage of Change Requests Accepted or Rejected Within 10 Days—Region	103	SCR1	CM-11 Percentage of Software Change Requests Implemented Within 60 Weeks of Prioritization—Region	<p>Rationale Elimination of Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM document</p>				
100	N4	CM-1 Timeliness of Change Management Notices—Region																			
100	DF	CM-3 Timeliness of Documentation Associated with Change—Region																			
104	SEC	CM-6 Percentage of Software Errors Corrected in "X" Business Days—Region																			
102	CRA	CM-7 Percentage of Change Requests Accepted or Rejected Within 10 Days—Region																			
103	SCR1	CM-11 Percentage of Software Change Requests Implemented Within 60 Weeks of Prioritization—Region																			
<p>Rationale Elimination of Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM document</p>																					

Appendix C	Statistical Properties and Definitions		
-------------------	---	--	--

	<p>The statistical process for testing whether BellSouth's (BS) AT&T's wholesale customers (alternative Competitive Local eExchange eCarriers or CLECs) are being treated equally with BS's AT&T's retail customers involves more than a simple mathematical formula. Three key elements need to be considered before an appropriate decision process can be developed. These are the type of:</p> <p>Data Comparison Performance</p> <p>This section describes the properties of a test methodology and the</p>		Parties Agree.
--	--	--	-----------------------

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments																								
	<p>truncated Z statistic for three types of measures that compare CLEC's performance to AT&T's retail analog.</p> <p>Example:</p> <p>Some of the covariates that are standardized to provide a parity parity, are order type, time of month, and wire center.</p>																										
C.2	<p>Testing Methodology – The Truncated Z</p> <p>In summary, many covariates are chosen in order to provide meaningful comparison levels below the submetric level chosen for the parity comparison. This includes such factors as wire center and time of month, as well as order type for provisioning measures. In each comparison cell, a Z statistic is calculated. The form of the Z statistic may vary depending on the performance measure, but it should be distributed approximately as a standard normal, with mean zero and variance equal to one. Assuming that the test statistic is derived so that it is negative when the performance for the CLEC is worse than for the ILEC, a positive truncation is done – i.e. if the result is negative it is left alone, if the result is positive it is changed to zero. A weighted average of the truncated statistics is calculated where a cell's weight depends on the volume of BS+AT&T and CLEC orders in the cell. The weighted average is standardized by subtracting the weighted theoretical mean of the truncated distribution, and this is divided by the standard error of the weighted average. Summaries based on measurement type are given for the calculation of the cell Z statistic.</p> <p>As an example of the remedial approach that is being proposed in detail, and as a way to illustrate the remedial approach, we consider the parity measure of Billing Invoice Accuracy. The remedial approach is to calculate the parity measure of Billing Invoice Accuracy by subtracting the Absolute Value of Total Billing-Related Adjustments during the current month from the Absolute Value of Total Billed Revenues during the current month and multiplying these results by 100. The formula is as follows:</p> $\text{Billing Invoice Accuracy Ratio} = \left[\frac{\text{Absolute Value of Total Billed Revenues during current month} - \text{Absolute Value of Total Billing-Related Adjustments during current month}}{\text{Absolute Value of Total Billed Revenues during current month}} \right] \times 100$ <p>A numerical example of the remedy calculation is given below:</p> <p>Example:</p> <p>CLEC DATA</p> <table border="0"> <tr> <td>Bill Adjustments</td> <td>-----</td> <td>\$14,660.00</td> </tr> <tr> <td>Total Billed Revenue</td> <td>-----</td> <td>\$336,529.00</td> </tr> </table> <p>BellSouth DATA</p> <table border="0"> <tr> <td>Bill Adjustments</td> <td>-----</td> <td>\$6,018,969.26</td> </tr> <tr> <td>Total Billed Revenue</td> <td>-----</td> <td>\$484,691,922.40</td> </tr> </table> <p>CLEC Invoice Accuracy Ratio = $\left[\frac{336,529.00 - 14,660.00}{336,529.00} \right] \times 100$</p>	Bill Adjustments	-----	\$14,660.00	Total Billed Revenue	-----	\$336,529.00	Bill Adjustments	-----	\$6,018,969.26	Total Billed Revenue	-----	\$484,691,922.40	<p>Testing Methodology – The Truncated Z...</p> <p>...As an example of one approach taken for a parity measure that does not use the truncated Z methodology, consider the measure Billing Invoice Accuracy. In Florida, BellSouth calculates results for this measure by subtracting the Absolute Value of Total Adjustments during the current month from the Absolute Value of Total Billed Revenues during the current month then dividing these results by the Absolute Value of Total Billed Revenues during the current month and multiplying these results by 100. The formula is as follows:</p> $\text{Billing Invoice Accuracy Ratio} = \left[\frac{\text{Absolute Value of Total Billed Revenues during current month} - \text{Absolute Value of Total Billing-Related Adjustments during current month}}{\text{Absolute Value of Total Billed Revenues during current month}} \right] \times 100$ <p>A numerical example of the remedy calculation is given below:</p> <p>Example:</p> <p>CLEC DATA</p> <table border="0"> <tr> <td>Bill Adjustments</td> <td>-----</td> <td>\$14,660.00</td> </tr> <tr> <td>Total Billed Revenue</td> <td>-----</td> <td>\$336,529.00</td> </tr> </table> <p>BellSouth DATA</p> <table border="0"> <tr> <td>Bill Adjustments</td> <td>-----</td> <td>\$6,018,969.26</td> </tr> <tr> <td>Total Billed Revenue</td> <td>-----</td> <td>\$484,691,922.40</td> </tr> </table> <p>CLEC Invoice Accuracy Ratio = $\left[\frac{336,529.00 - 14,660.00}{336,529.00} \right] \times 100$</p>	Bill Adjustments	-----	\$14,660.00	Total Billed Revenue	-----	\$336,529.00	Bill Adjustments	-----	\$6,018,969.26	Total Billed Revenue	-----	\$484,691,922.40	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
Bill Adjustments	-----	\$14,660.00																									
Total Billed Revenue	-----	\$336,529.00																									
Bill Adjustments	-----	\$6,018,969.26																									
Total Billed Revenue	-----	\$484,691,922.40																									
Bill Adjustments	-----	\$14,660.00																									
Total Billed Revenue	-----	\$336,529.00																									
Bill Adjustments	-----	\$6,018,969.26																									
Total Billed Revenue	-----	\$484,691,922.40																									

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Administrative changes to the formula for calculating the adjusted, asymmetric-modified t statistic are proposed. BSF is proposed to be removed from the formula and replaced with the term "BSF-AT&T".</p> <p>Administrative changes to the formula for calculating the adjusted, asymmetric-modified t statistic are proposed. BSF is proposed to be removed from the formula and replaced with the term "BSF-AT&T".</p> <p>Rationale:</p> <p>Administrative changes for clarity and consistency with the formula provided explicitly in Appendix D.</p> <p>Administrative changes to remove all state-specific references within the SEEM Plan.</p> <p>Measures addressed within this text, OSS-1 and O-1.2 are currently Tier II only remedies. Also reference within this text are the B-1 and B-5 metrics proposed to be deleted.</p>		
C.2.1	<p>Mean Measures</p> <p>For mean measures, an adjusted, asymmetric-modified t statistic is calculated for each like-to-like cell that has at least seven BSF-AT&T and seven CLEC transactions. A permutation test is used when one or both of the BSF-AT&T and CLEC sample sizes is less than seven. The adjusted, asymmetric-modified t statistic and the permutation calculation are described in Appendix D, Statistical Formulas and Technical Description.</p> <p>Rationale:</p> <p>Administrative change for clarity and consistency with established terminology. In the SEEM document the same statistic is sometimes referred to as asymmetric t, sometimes as modified t. The modification to the classical Student's t introduces asymmetry, so both are technically correct, but multiple terms are confusing to some readers. AT&T decided to use just one term, the one that is more prevalent in the performance measurements remedy plans nationwide.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
C.2.2	<p>Proportion Measures</p> <p>For performance measures that are calculated as a proportion, in each adjustment cell, the cell Z and the moments for the truncated cell Z can be calculated in a direct manner. In adjustment cells where proportions are not close equal to zero or one, and where the sample sizes are reasonably large</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>($n_i p_i (1-p_i) > 9$), a normal approximation can be used. In this case, the moments for the truncated Z come directly from properties of the standard normal distribution. If the normal approximation is not appropriate, then the Z statistic is calculated from the hypergeometric distribution. In this case, the moments of the truncated Z are calculated exactly using the hypergeometric probabilities.</p> <p>Example:</p> <p>Administrative change for utility: determining proportion metrics (e.g. design delays) close to 1 or 0 (either in the upper or lower 20%). Large sample normal approximation formulae are well defined only when proportions are not equal to zero or one.</p>		
C.2.3	<p>The truncated Z methodology for rate measures has the same general structure for calculating the Z in each cell as proportion measures. For the rate measure $\frac{\text{C}_{\text{customer}}}{\text{T}_{\text{trouble}} \text{R}_{\text{report}} \text{R}_{\text{rate}}}$ there are a fixed number of access lines in service for the CLEC, b_{2j}, and a fixed number for BSA&T, b_{1j}. The modeling assumption is that the occurrence of a trouble is independent between access lines, and the number of troubles in b access lines follows a Poisson distribution with mean $\lambda \cdot b$ where λ is the probability of a trouble per 1 access line and $b (= b_{1j} + b_{2j})$ is the total number of access lines in service. The exact permutation distribution for this situation is approximated by the binomial distribution (the limit for the hypergeometric distribution) that is based on the total number of BSA&T and CLEC troubles, n, and the proportion of BSA&T access lines in service, $q_j = b_{1j}/b$.</p> <p>In an adjustment cell, if the number of CLEC troubles is greater than 15 and the number of BSA&T troubles is greater than 15, and $n_j q_j (1-q_j) > 9$, then a normal approximation can be used. In this case, the moments of the truncated Z come directly from properties of the standard normal distribution. Otherwise, if there are very few troubles, the number of CLEC troubles can be modeled using a binomial distribution with n equal to the total number of troubles (CLEC plus BSA&T troubles). In this case, the moments for the truncated Z are calculated explicitly using</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>the binomial distribution.</p> <hr/> <p>Rationale</p> <p>Administrative change of style. Rationale for the SEEM plan.</p> <p>Administrative change of style. Rationale for the SEEM plan.</p> <p>No change to the SEEM plan.</p> <p>The exact permutation distribution is not binomial, since two variables per cell are possible. Also, due to line loss, binomial model is an approximation. Clarification of the underlying theoretical probability model. No changes to the SEEM plan.</p>		
Appendix D	Statistical Formulas and Technical Descriptions		
	<p>We start by assuming that the data are disaggregated so that comparisons of CLEC's performance to AT&T's retail analog are made within appropriate classes or adjustment cells that define "like" observations.</p> <hr/> <p>Rationale</p> <p>Administrative change of style.</p>		Parties Agree.
D.1	<p>Notation and Exact Testing Distributions</p> <p>Below, we have detailed the basic notation for the construction of the truncated Z statistic. In what follows the word "cell" should be taken to mean a like-to-like comparison cell that has both <u>at least one</u> (or more) ILEC observation and <u>at least one</u> (or more) CLEC observation...</p> <p>... The exact parity test is the permutation test based on the "modified Z" statistic. For large samples, we <u>one</u> can avoid permutation calculations since this statistic will be normal (or Student's t) to a good approximation. For small samples, where we <u>one</u> cannot avoid permutation calculations, we have found it has been determined that the difference between "modified Z" and the textbook "pooled Z" is negligible. We <u>therefore</u> propose to use the permutation test based on pooled Z for small samples <u>will be used</u>. This decision speeds up the permutation computations considerably, because for each permutation we need only compute the sum of the CLEC sample values, and not the pooled statistic itself...</p> <hr/> <p>Rationale</p> <p>Administrative change of style. No changes to the SEEM plan.</p>		Parties Agree.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
D.2.2	<p>Calculate a <u>Z-Value-Score</u> (Z_j) for each Cell</p> <p>... that is, α is the probability that a <u>Student's t</u> random variable with $n_{1j} - 1$ degrees of freedom, is less than...</p> <p>... over all cells within the submeasure being tested such that all three conditions stated below are true. These conditions are: (1) all three conditions are true; (2) all three conditions are true; (3) all three conditions are true.</p> $-Z_j > 0$ $n_{1j} > 6$ $n_{1j} \geq n_{3q}$ for all values of j , where n_{3q} is the 3 ^d quartile of all values of n_{1j} in cells where the first two conditions are true. <p><u>If no submeasure cells exist that satisfy these conditions, then $g = 0$.</u></p> <p>Note, that t_j is the "modified Z" statistic. The statistic T_j is a "modified Z" ... and is adjusted for the skewness of the ILEC data...</p> <p>Rationale: Administrative change for clarity. Student's t statistic is a standard statistical terminology. Computing change for clarification of the three conditions for the construction of g. Administrative change for clarity. The "modified Z" defined here adjusts for skewness, but the skewness may not be fully corrected. No change to the SEEM plan.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
D.2.3	<p>Obtain a <u>Truncated Z-Value-Score</u> for each Cell (Z_j^*)</p> <p>To limit the amount of cancellation that takes place between cell results during aggregation, cells whose results suggest possible favoritism are left alone. Otherwise the cell statistic is set to zero.</p> <p>This means that positive equivalent <u>Z-value-Scores</u> are set to 0, and negative values are left alone. Mathematically, this is written as $Z_j^* = \min(0, Z_j)$</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<p>Rationale:</p> <p>None. The proposed changes are consistent with the current rules and do not affect the results of the test.</p>		
D.2.4	<p>Calculate the Theoretical Mean and Variance</p> <p>...</p> <ul style="list-style-type: none"> If $\min(n_{1j}, n_{2j}) > 6$ for a mean measure, or $\min\left\{a_{1i}\left(1 - \frac{a_{1i}}{n_{1i}}\right), a_{2i}\left(1 - \frac{a_{2i}}{n_{2i}}\right)\right\} > 9$ for a proportion measure, or $\min(n_{1j}, n_{2j}) > 15$ and $n_j q_j (1 - q_j) > 9$ for a rate measure, then... <p>Rationale:</p> <p>Various alternative changes for all three tests create the alternative conditions for the three types of measures: A for means, B for proportions, or C for rates.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
D.2.5	<p>Calculate the Overall Test Statistic (Z^T)</p> <p>The Balancing Critical Value</p> <p>There are four key elements of the statistical testing process:</p> <ul style="list-style-type: none"> the null hypothesis, H_0, that parity exists between ILEC and CLEC services the alternative hypothesis, H_a, that the ILEC is giving better service to its own customers the Truncated Z test statistic, Z^T, and a critical value, c <p>The decision rule¹ is</p> <ul style="list-style-type: none"> If $Z^T < c$ then accept H_a. If $Z^T \geq c$ then accept H_0. <p>There are two types of errors possible when using such a decision rule:</p> <ul style="list-style-type: none"> Type I Error (α): Deciding favoritism exists when there is, in fact, no favoritism. Type II Error (β): Deciding parity exists when there is, in fact, favoritism. 		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

¹ This decision rule assumes that a negative test statistic indicates poor service for the CLEC customer. If the opposite is true, then reverse the decision rule.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<p>The probabilities of each type of error are:</p> <ul style="list-style-type: none"> • <u>Type I Error:</u> $\alpha = P(Z^T < c H_0)$ • <u>Type II Error:</u> $\beta = P(Z^T \geq c H_a)$ <p>Type I Error: $\alpha = P(Z^T < c H_0)$</p> <p>Type II Error: $\beta = P(Z^T \geq c H_a)$</p> <p>We want a balancing critical value, c_B, so that $\alpha = \beta$.</p> <p>It can be shown that:</p> $c_B = \frac{\sum_j W_j M(m_j, se_j) - \sum_j W_j \frac{-1}{\sqrt{2\pi}}}{\sqrt{\sum_j W_j^2 V(m_j, se_j) + \sum_j W_j^2 \left(\frac{1}{2} - \frac{1}{2\pi}\right)}}$ <p>where</p> $M(\mu, \sigma) = \mu \Phi\left(\frac{-\mu}{\sigma}\right) - \sigma \phi\left(\frac{-\mu}{\sigma}\right)$ $V(\mu, \sigma) = (\mu^2 + \sigma^2) \Phi\left(\frac{-\mu}{\sigma}\right) - \mu \sigma \phi\left(\frac{-\mu}{\sigma}\right) - M(\mu, \sigma)^2$ <p>$\Phi(\cdot)$ is the cumulative standard normal distribution function, $\phi(\cdot)$ is the standard normal density function, and μ and σ are the formal arguments of functions $M(\cdot, \cdot)$ and $V(\cdot, \cdot)$.</p> <p>This formula assumes that Z_j is approximately normally distributed within cell j. When the cell sample sizes, n_{1j} and n_{2j}, are small this may not be true. It is possible to determine the cell mean and variance under the null hypothesis when the cell sample sizes are small. It is much more difficult to determine these values under the</p>		
--	---	--	--

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<p>alternative hypothesis. Since the cell weight, W_i will also be small (see calculate weights section above) for a cell with small volume, the cell mean and variance will not contribute much to the weighted sum. Therefore, the above formula provides a reasonable approximation to the balancing critical value.</p> <p>The values of m_i and se_i will depend on the type of performance measure.</p> <p>Mean Measure</p> <p>For mean measures, one is concerned with two parameters in each cell, namely, the mean and variance. A possible lack of parity may be due to a difference in cell means, and/or a difference in cell variances. One possible set of hypotheses that capture this notion, and take into account the assumption that transactions are identically distributed within cells is:</p> <p>$H_0: \mu_{1j} = \mu_{2j}, \sigma_{1j}^2 = \sigma_{2j}^2$</p> <p>$H_a: \mu_{2j} = \mu_{1j} + \delta_j, \sigma_{2j}^2 = \lambda_j \sigma_{1j}^2$</p> <p>—Where $\delta_j > 0, \lambda_j \geq 1, j = 1, \dots, L$—where δ_j and λ_j corresponds to the Delta and Lambda values defined in section 4.1.6 of the Administrative Plan)</p> <p>Under this form of alternative hypothesis, the cell test statistic Z_j has mean and standard error given by</p> $m_j = \frac{-\delta_j}{\sqrt{\frac{1}{n_{1j}} + \frac{1}{n_{2j}}}}$ <p>and</p> $se_j = \sqrt{\frac{\lambda_j n_{1j} + n_{2j}}{n_{1j} + n_{2j}}}$ <p>Proportion Measure</p> <p>For a proportion measure there is only one parameter of interest in each cell, the proportion of transaction possessing an attribute of interest. A possible lack of parity may be due to a difference in cell proportions. A set of hypotheses that take into account the assumption that transactions are identically distributed within cells</p>		
--	--	--	--

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>while allowing for an analytically tractable solution is:</p> <p>$H_0: \frac{p_{2j}(1-p_{1j})}{(1-p_{2j})p_{1j}} = 1$</p> <p>$H_a: \frac{p_{2j}(1-p_{1j})}{(1-p_{2j})p_{1j}} = \psi_j$</p> <p>...Where parameters ψ_j corresponds to the ψ_j values defined in section 4.1.6 of the Administrative Plan...</p> <p>... Using the equations above, we see it can be shown that Z_j has mean and standard error given by</p> $m_j = \frac{n_j^2 \pi_j^{(1)} - n_{1j} a_j}{\sqrt{\frac{n_{1j} n_{2j} a_j (n_j - a_j)}{n_j - 1}}}$ <p>and</p> $se_j = \sqrt{\frac{n_j^3 (n_j - 1)}{n_{1j} n_{2j} a_j (n_j - a_j) \left(\frac{1}{\pi_j^{(1)}} + \frac{1}{\pi_j^{(2)}} + \frac{1}{\pi_j^{(3)}} + \frac{1}{\pi_j^{(4)}} \right)}}$ <p>...Rate Measure</p> <p>A rate measure also has only one parameter of interest in each cell, the rate at which a phenomenon is observed relative to a base unit, e.g. the number of troubles per available line. A possible lack of parity may be due to a difference in cell rates. A set of hypotheses that take into account the assumption that transactions are identically distributed within cells is:</p>		

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p> $H_0: r_{1j} = r_{2j}$ $H_a: r_{2j} = \epsilon_j r_{1j} \quad \epsilon_j > 1 \text{ and } j = 1, \dots, L.$ </p> <p> ... Where parameters ϵ_j corresponds to the ... Epsilon values defined in section 4.1.6 of the Administrative Plan ... </p> <p>Rationale</p> <p>Administrative change to provide missing symbols, notation to set prior, parenthesis, and verbiage to clarify current statistical process, e.g.</p> <ul style="list-style-type: none"> The decision rule must cover all cases. The selection of "the equal to self" is consistent with the definition of the type II error below. Upper and lower standard of symbols for Type I and II errors. <p>Administrative change to align verbiage with text.</p> <p>Mean and Sigma (σ) usually have a special meaning in the context of a normal distribution. They were not earlier explained and refer to the first and second moments of the distribution, but are not necessarily normal. It may be confusing to some readers.</p> <p>No changes to the SEEM plan.</p> <p>The "greater than or equal to" sign between the lambda and symbol λ and λ was omitted in the previous versions of SEEM. The lambda parameter description was missing.</p> <p>Verbiage changes for clarity.</p>		
D.2.6	<p>Determining the Parameters of the Alternative Hypothesis</p> <p>In this section we have indexed the alternative hypothesis of mean measures by two sets of parameters, λ_j and δ_j (where λ_j and δ_j corresponds to the <u>Lambda</u> and <u>Delta</u> values defined in section 4.1.6 of the Administrative Plan section). Proportion measures are indexed by parameter ψ_j and rate measures by ϵ_j (these parameters correspond to the Psi and Epsilon of section 4.1.6). A major difficulty with this approach is that more than one alternative will be of interest; for example we may consider one alternative in which all the δ_j are set to a common non-zero value, and another set of alternatives in each of which just one δ_j is non-zero, while all the rest are zero. There are very many other possibilities. Each possibility leads to a single value for the balancing critical value; and each possible critical value corresponds too many sets of alternative hypotheses, for each of which it constitutes the correct balancing value.</p> <p>... <i>Parameter Choices for λ_j</i> – The set of parameters λ_j index alternatives to the null hypothesis that arise because there might be greater</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>unpredictability or variability in the delivery of service to a CLEC customer over that which would be achieved for an otherwise comparable ILEC customer. While concerns about differences in the variability of service are important, it turns out that the truncated Z testing which is being recommended here is relatively insensitive to all but very large values of the λ_p. Put another way, reasonable differences in the values chosen here could make very little difference in the balancing points chosen. Therefore, λ_p parameters have been set to 1.</p> <p>Rationale</p> <p>Adrian's native change to provide missing symbols, notation description, and comments to clarify current statistical process.</p> <p>The values of λ_p and $\lambda_{p,c}$ parameters are consistent with the original of the SEEM document. The change reflects original (still current) implementation. No changes to the SEEM plan.</p>		
Appendix E	BSAT&T SEEM Remedy Calculation Procedures		
E.1.1	<p>Tier-1 Calculation For Retail Analogs</p> <p>DETERMINE IF AN INDIVIDUAL CLEC FAILS A TIER-1<u>TIER-1</u> SUBMETRIC</p> <ol style="list-style-type: none"> Tier-1<u>Tier-1</u> is triggered by a monthly failure of any Tier-1<u>Tier-1</u> Remedy Plan submetric. Calculate the overall test statistic for a CLEC (CLEC1); Example, z_{CLEC1}^T (Pper Statistical Methodology). Calculate the balancing critical value (Example, $^cB_{CLEC1}$) that is associated with the alternative hypothesis (for fixed parameters $\lambda, \delta, \psi, \mu$, or ϵ) for that CLEC. If the overall test statistic is equal to or above the balancing critical value, stop here. That is, if $^cB_{CLEC1} \leq z_{CLEC1}^T$, stop here. Otherwise, go to step 5. <p>CALCULATE REMEDY PAYMENT FOR CORRECTION OF TEST STATISTIC TO THE <u>BALANCING CRITICAL VALUE</u></p> <ol style="list-style-type: none"> Select the cell with the most negative <u>z-value Z-Score</u> (let $i=1, \dots, J$ with $i=1$ having the most negative <u>z-value Z-Score</u>, $i=2$ having next most negative <u>z-value Z-Score</u>, etc. and with $i=J$ when the criterion in step 7 is fulfilled.) and set its <u>z-value Z-Score</u> to zero ($z_{CLEC1,i} = 0$). 		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<p>6. Recalculate the overall test statistic for that CLEC with the adjusted data; Example, $z_{CLEC1}^1 = \frac{B_{CLEC1}}{\sqrt{P_{CLEC1}}}$ (Per Statistical Methodology).</p> <p>7. If the new overall test statistic is equal to or above the balancing critical value, that is, if $B_{CLEC1} \geq z_{CLEC1}^1$, go to step 8. Otherwise, repeat steps 5 – 6 letting $i = i + 1$.</p> <p>8. Calculate the Total Affected Volume (TAV) by summing the Total Impacted Volumes (TIV) of each cell whose z-value<u>Z-Score</u> was reset to zero except the last cell changed. The z-value<u>impacted</u> volume for the last cell changed should be interpolated by</p> $TIV_{CLEC1,INT} = (B_{CLEC1} - z_{CLEC1,i-1}^1) / (z_{CLEC1,i}^1 - z_{CLEC1,i-1}^1) \times TIV_{CLEC1,i}$ <p>The result should be rounded up to the next positive integer and added to TAV_{CLEC1}. That is, $TAV_{CLEC1} = TIV_{CLEC1,1} + TIV_{CLEC1,2} + \dots + TIV_{CLEC1,i-1} + TIV_{CLEC1,INT}$. Note that if $TIV_{CLEC1,i} = 1$ then $TIV_{CLEC1,INT} = 1$ and the interpolation step can be omitted. Any transactions that cause the overall test statistic to be between the BCV and zero will be included in the TIV for transactions between the BCV and zero.</p> <p>9. Calculate the below-BCV portion of the payment to CLEC1 by multiplying the result of step 8 (TAV_{CLEC1}) by the appropriate dollar amount from the fee schedule. Thus, CLEC1's payment = $TAV_{CLEC1} \times \text{\\$}$ from Fee Schedule. Here the fee should be derived from Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination (Appendix A), multiplied by the appropriate factor from section 4.3.1.1. This factor is 3/2 if the CLEC aggregate performance passes and 3 if the CLEC aggregate performance fails.</p> <p>———— CALCULATE REMEDY PAYMENT FOR CORRECTION OF TEST STATISTIC TO ZERO</p> <p>10. If the current overall adjusted test statistic (calculated in step 6) is equal to or above zero, that is, if $0 \leq z_{CLEC1}^1$ for $i = 1$, then go to step 11. Otherwise, go to step 11.</p> <p>———— 11. ———— Select the cell with the most negative remaining z-value (let $i = 1, \dots, J$ with $i = 1$ having the most negative z value, $i = 2$ having next most negative z value, etc. and with $i = J$ when the criterion in step 13 is fulfilled.) and set its z-value to zero ($z_{CLEC1,i} = 0$).</p> <p>———— 12. ———— Recalculate the overall test statistic for that CLEC with the adjusted data; Example, z_{CLEC1}^1 (Per Statistical Methodology).</p> <p>———— 13. ———— If the new overall test statistic is equal to or above zero, that is, if $B_{CLEC1} \geq z_{CLEC1}^1$, go to step 14. Otherwise, repeat steps 11 – 12 letting $i = i + 1$.</p> <p>———— 14. ———— Calculate the Total Affected Volume (TAV0) by</p>		
--	--	--	--

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<p>summing the Total Impacted Volumes (TIV) of each cell whose z-value was reset to zero except the last cell changed. The affected volume for the last cell changed should be interpolated by</p> $\frac{z'_{(C1,C2)} - z'_{(C1,C3)}}{z'_{(C1,C3)} - z'_{(C1,C4)}} \times (TIV_{(C1,C4)} - TIV_{(C1,C3)}) + TIV_{(C1,C3)}$ <p>The result should be rounded up to the next positive integer and added to $TAV_{(C1,C2)}$. That is, $TAV_{(C1,C2)} = (TIV_{(C1,C2)} - TIV_{(C1,C3)}) + \frac{z'_{(C1,C2)} - z'_{(C1,C3)}}{z'_{(C1,C3)} - z'_{(C1,C4)}} \times (TIV_{(C1,C4)} - TIV_{(C1,C3)}) + TIV_{(C1,C3)}$. Note that if $TIV_{(C1,C2)} = 1$ then $TIV_{(C1,C3)} = 1$ and the interpolation step can be omitted. Also, $TIV_{(C1,C2)} - TIV_{(C1,C3)}$ is the remaining transactions from $TIV_{(C1,C2)}$ that were not used in step 8 and if $TIV_{(C1,C2)} = TIV_{(C1,C3)}$ then $TAV_{(C1,C2)} = 0$.</p> <ul style="list-style-type: none"> Calculate the 0 to BCV portion of the payment to CLEC1 by multiplying the result of step 14 ($TAV_{(C1,C2)}$) by the appropriate dollar amount from the fee schedule. Thus, $CLEC1_{\text{payment}} = TAV_{(C1,C2)} \times \\$ from Fee Schedule. Here the fee should be derived from Table 1, Fee Schedule for Tier 1 Per Transaction Fee Determination (Appendix A) multiplied by the appropriate factor from section 1.3.1.4. This factor is 1.3 if the CLEC aggregate performance passes and 2.3 if the CLEC aggregate performance fails. <p>-----</p> <p>----- CALCULATE TOTAL REMEDY PAYMENT FOR CLEC1</p> <p>16. The total remedy payment for CLEC1 is found by adding the results from step 9 to the results from step 15. That is $CLEC1_{\text{TOTAL payment}} = CLEC1_{\text{BCV payment}} + CLEC1_{\text{payment}}$.</p> <p>Rationale:</p> <p>Administrative corrections to terms and symbol omissions in prior version.</p> <p>AT&T proposes to remove calculations between BCV and zero from remedy calculation. There is no added value for adjusting the truncated Z statistic in the way to 0. The use of the balancing alpha-beta error methodology will assure that AT&T will remain accountable for accurately evaluating the performance of each measure. Correcting test values between BCV and zero does not provide balanced results for the determination of remedies.</p> <p>Changes consistent with the removal of remedies based on Z-Score correction between BCV and 0.</p>		
--	--	--	--

E.1.2	<p>Example: CLEC1 Percent Repeat Customer Troubles Within 30 Days (PRT) for Resale (DSGN).</p> <p>Submeasure Category = Provisioning - Resale</p> <p>Failure Month = Month 1</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
-------	---	--	---

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

CLEC Aggregate Result = Failed

	n_t	n_c	I_c	Z_{CLEC}^T	$C_{B_{CLEC}}$		Order Zeroed Out (H/J)	T_{AV}^T (< B_{CV})	T_{AV}^T (0 to B_{CV})
State	312	27	18	-4.10	-1.22				
Cell				Z_{CLEC}^T	RANK	Z_{CLEC}^T			
1		1	0	0.75					
2		4	2	-0.69	8				
3		3	3	-1.76	3	-0.65 ^Δ	3	2 ^o	+
4		1	0	0.67					
5		4	3	-1.45	5	0.80 ^{ΔΔ}	5		1 ^o
6		3	3	-3.45	1	-2.46	1	3	
7		2	2	-1.81	2	-1.60	2	2	
8		3	2	-1.09	6				
9		1	1	-1.65	4	0.43	4		+
10		2	1	-0.84	7				
11		1	0	0.62					
12		2	1	-0.40	9				
Total			18					7	3

^ΔNote that after making $Z_{CLEC}^T = 0$, the overall $Z_{CLEC}^T = -0.65$ is greater than the balancing critical value $C_{B_{CLEC}} = -1.22$.

^{ΔΔ}Note that after making $Z_{CLEC}^T = 0$, the overall $Z_{CLEC}^T = 0.80$ is greater than zero.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>⁴For cell#3 the TAV_{11V} would be calculated with $((-1.22) - (-1.60)) ((-0.65) - (-1.60)) \times 3 = 1.2$ which is rounded up to 2 transactions.</p> <p>⁵For cell#5 the TAV₀ would be calculated with $((0) - (-0.13)) ((0.80) - (-0.13)) \times 4 = 0.56$ which is rounded up to 1 transaction.</p> <p>Remedy payment for CLEC_{BCV} payment is (7 units) * (\$40/unit) * (+3 factor) = \$840 when the CLEC aggregate performance fails. Remedy payment for CLEC_{TAV} payment is (3 units) * (\$40/unit) * (2-3 factor) = \$80 when the CLEC aggregate performance fails. The total remedy payment is CLEC_{TAV} payment = \$840 + \$80 = \$920, \$280.</p> <hr/> <p>Rationale:</p> <p>Propose elimination of multipliers. (Refer to section 4.3 for rationale)</p> <p>Refer to rationale provided for E.1.1 for removal of BCV and zero calculation.</p>		
E.2	<p>Tier 2 Calculation For Retail Analogs</p> <p>1. _____ Tier 2 is triggered by three consecutive monthly failures of any Tier 2 Remedy Plan sub-metric. Determine failure by performing steps 2-4 in section E.1.1 for each of the three consecutive months for the aggregate of all CLEC data. If any month passes, no remedies are required.</p> <p>2. _____ If remedies are required, calculate monthly statistical results and affected volumes for the CLEC aggregate performance for each of the three consecutive months as outlined in steps 5-8 and 10-14 of section E.1.1. Determine average monthly affected volumes for the rolling 3-month period for both the TAV (remedies required for correcting the test statistic back to the BCV) and the TAV₀ (remedies required for correcting the test statistic back to zero).</p> <p>3. _____ Calculate the payment to State Designated Agency by multiplying average monthly volumes by the appropriate dollar amount from the Tier 2 fee schedule (Appendix A, Table 2: Tier 2 Per Transaction Fee Determination).</p> <p>4. _____ Therefore, State Designated Agency payment = (average monthly volume TAV * \$\$ from Fee Schedule) + (average monthly volume TAV₀ * \$\$ from Fee Schedule).</p> <hr/> <p>Rationale:</p> <p>Eliminate reference to Tier 2</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

E.2.4	<p>Example: STATE A Percent Provisioning Troubles within X Days - UNE Loops Design</p> <p>_____ Submeasure Category = Provisioning - UNE</p> <p>_____ Failure Month = Month 1</p> <p>_____ CLEC Aggregate Result = Failed all three months</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>																																																																																										
	<table border="1"> <thead> <tr> <th>Month</th> <th>A1</th> <th>A2</th> <th>A3</th> <th>Z^T_{CLEC}</th> <th>B_{CLEC}</th> <th>Order Zeroed Out (H/J)</th> <th>TAV (< BCV)</th> <th>TAV0 (0- BCV)</th> </tr> </thead> <tbody> <tr> <td>State</td> <td>155</td> <td>37</td> <td>3</td> <td>-5.11</td> <td>-0.35</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Cell</td> <td></td> <td></td> <td></td> <td>Z_{CLEC}</td> <td>RANK</td> <td>Z^T_{CLEC}</td> <td></td> <td></td> </tr> <tr> <td>1</td> <td></td> <td>3</td> <td>1</td> <td>-1.53</td> <td>5</td> <td>0.91</td> <td></td> <td>1²⁰</td> </tr> <tr> <td>2</td> <td></td> <td>1</td> <td>0</td> <td>0.31</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>3</td> <td></td> <td>2</td> <td>1</td> <td>-2.18</td> <td>3</td> <td>-1.21</td> <td>3</td> <td>1</td> </tr> <tr> <td>4</td> <td></td> <td>1</td> <td>1</td> <td>-4.52</td> <td>2</td> <td>-2.39</td> <td>2</td> <td>1</td> </tr> <tr> <td>5</td> <td></td> <td>1</td> <td>0</td> <td>0.28</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>6</td> <td></td> <td>18</td> <td>1</td> <td>-0.24</td> <td>8</td> <td></td> <td></td> <td></td> </tr> <tr> <td>7</td> <td></td> <td>5</td> <td>1</td> <td>-0.45</td> <td>7</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Month	A1	A2	A3	Z ^T _{CLEC}	B _{CLEC}	Order Zeroed Out (H/J)	TAV (< BCV)	TAV0 (0- BCV)	State	155	37	3	-5.11	-0.35				Cell				Z _{CLEC}	RANK	Z ^T _{CLEC}			1		3	1	-1.53	5	0.91		1 ²⁰	2		1	0	0.31					3		2	1	-2.18	3	-1.21	3	1	4		1	1	-4.52	2	-2.39	2	1	5		1	0	0.28					6		18	1	-0.24	8				7		5	1	-0.45	7					
Month	A1	A2	A3	Z ^T _{CLEC}	B _{CLEC}	Order Zeroed Out (H/J)	TAV (< BCV)	TAV0 (0- BCV)																																																																																					
State	155	37	3	-5.11	-0.35																																																																																								
Cell				Z _{CLEC}	RANK	Z ^T _{CLEC}																																																																																							
1		3	1	-1.53	5	0.91		1 ²⁰																																																																																					
2		1	0	0.31																																																																																									
3		2	1	-2.18	3	-1.21	3	1																																																																																					
4		1	1	-4.52	2	-2.39	2	1																																																																																					
5		1	0	0.28																																																																																									
6		18	1	-0.24	8																																																																																								
7		5	1	-0.45	7																																																																																								

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

8	1	1	-5.39	1	-3.74	1	1	
9	4	1	-0.50	6				
10	1	1	-2.14	4	-0.04	4	1 ⁹	0
Total		8					4	4

⁸Note that after making $z_{CLEC1,1} = 0$, the overall $z_{CLEC1}^* = -0.04$ is greater than the balancing critical value $^C B_{CLEC1} = -0.35$.

⁹Note that after making $z_{CLEC1,1} = 0$, the overall $z_{CLEC1}^* = 0.80$ is greater than zero.

⁹For cell#10 the TAV₁ would not be interpolated given that the impacted volume for that cell is only 1.

⁹⁹For cell#1 the TAV₅ would not be interpolated given that the impacted volume for that cell is only 1.

TAV for month 1 is 4 units, TAV0 for month 1 is 1 unit.

Submeasure Category = Provisioning
UNE

Failure Month = Month 2

CLEC Aggregate Result = Failed all three months

	n_1	n_c	l_c	z_{CLEC1}^*	$^C B_{CLEC1}$	Order Zeroed Out (I/J)	TAV (< BCV)	TAV0 (0- BCV)
2								
State	175	13	3	-0.94	-0.39			

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

Cell			$z_{CLEC1,t}$	RANK	z_{CLEC1}^*			
1	2	1	-1.58	2				
2	1	0	1.00					
3	1	0	0.25					
4	1	0	0.26					
5	2	0	0.46					
6	1	0	0.20					
7	2	1	-0.71	3				
8	1	1	-4.12	1	0.28 ¹	1	1 ^o	
9	1	0	0.35					
10	1	0	0.50					
Total		3					1	0

¹Note that after making $z_{CLEC1,t} = 0$, the overall $z_{CLEC1}^* = 0.28$ is greater than the balancing critical value $z_{CLEC1}^c = -0.39$. Note that it is also greater than zero. Therefore the total-affected volume has been identified.

^oFor cell#8 the TAV_t would not be interpolated given that the impacted volume for that cell is only 1.

TAV for month 2 is 1-unit, TAV_0 for month 2 is 0 units.

Submeasure Category = Provisioning

UNE

Failure Month = Month 3

CLEC Aggregate Result = Failed all three months

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

Month	Fl	Fc	Ic	Z _{CL} EC1	B _{CL} EC1	Order Zeroed Out (I/J)	TAV (BCV)	TAV0 (0- BCV)
State	196	33	3	-4.76	-0.49			
Cell				Z _{CL} C1	RAN K	Z _{CL} C1		
1		2	0	0.48				
2		4	1	-2.55	6			
3		2	0	0.57				
4		1	1	-3.00	4	-0.81	4	1
5		1	1	-3.16	2	-2.78	2	1
6		1	0	0.20				
7		1	1	-3.32	1	-3.76	1	1
8		2	1	-3.00	3	-1.78	3	1
9		1	1	-2.92	5	0.18	5	1 ^e
10		6	1	0.41				
11		10	1	-0.32	8			

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<table border="1" data-bbox="314 198 978 418"> <tr> <td>12</td> <td>1</td> <td>0</td> <td>0.24</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>13</td> <td>4</td> <td>0</td> <td>0.28</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total</td> <td></td> <td>8</td> <td></td> <td></td> <td></td> <td>5</td> <td>0</td> <td></td> </tr> </table> <p data-bbox="314 435 1045 568"> ⁺Note that after making $z_{CLEC11} = 0$, the overall $z_{CLEC1}^{+*} = 0.18$ is greater than the balancing critical value $^c B_{CLEC1} = -0.49$. Note that it is also greater than zero. Therefore the total affected volume has been identified. </p> <p data-bbox="314 584 1045 649"> ^oFor cell#9 the TAV₃ would not be interpolated given that the impacted volume for that cell is only 1. </p> <p data-bbox="314 665 1045 698"> TAV for month 3 is 5 units, TAV0 for month 3 is 0 units. </p> <p data-bbox="314 714 1045 779"> If the above examples represent performance for each of months 1 through 3, then </p> <hr/> <p data-bbox="314 803 416 828">Rationale</p> <p data-bbox="314 844 1045 901">Rationale for elimination of Tier 2 provided in proposed changes to SQM document</p>	12	1	0	0.24						13	4	0	0.28						Total		8				5	0			
12	1	0	0.24																											
13	4	0	0.28																											
Total		8				5	0																							
E.2.2	<table border="1" data-bbox="314 1052 978 1498"> <thead> <tr> <th>State</th> <th>TAV</th> <th>TAV0</th> </tr> </thead> <tbody> <tr> <td>Month 1</td> <td>4</td> <td>4</td> </tr> <tr> <td>Month 2</td> <td>1</td> <td>0</td> </tr> <tr> <td>Month 3</td> <td>5</td> <td>0</td> </tr> <tr> <td>Average TAV(0) for rolling 3 month period</td> <td>3.33</td> <td>0.33</td> </tr> <tr> <td>Remedy amount per unit (Appendix A Table 2)</td> <td>\$345</td> <td>\$76</td> </tr> </tbody> </table>	State	TAV	TAV0	Month 1	4	4	Month 2	1	0	Month 3	5	0	Average TAV(0) for rolling 3 month period	3.33	0.33	Remedy amount per unit (Appendix A Table 2)	\$345	\$76		<p data-bbox="1827 982 2392 1128">Area to be subject of PSC Workshop and ultimately staff recommendation.</p>									
State	TAV	TAV0																												
Month 1	4	4																												
Month 2	1	0																												
Month 3	5	0																												
Average TAV(0) for rolling 3 month period	3.33	0.33																												
Remedy amount per unit (Appendix A Table 2)	\$345	\$76																												

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<table border="1"> <tr> <td>Remedy Dollars</td> <td>\$1148.85</td> <td>\$25.08</td> </tr> </table> <p>Example: STATE A Percent Provisioning Troubles within 30 Days - UNE Loops Design</p> <p>The total remedy paid for this Tier 2 submetric is \$1148.85 -- \$25.08 -- \$1173.93 which rounds up to \$1174.</p> <p>Rationale:</p> <p>Eliminate reference to Tier 2</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document</p>	Remedy Dollars	\$1148.85	\$25.08		
Remedy Dollars	\$1148.85	\$25.08				

<i>E.3E.2</i>	<p>Tier-1 Calculation For Benchmarks</p> <p>1. For each CLEC with five or more observations, calculate monthly performance results for the State.</p> <p>2. CLECs having observations (sample sizes) between 5 and 30 will use Table 1 below, the large sample threshold L will use benchmark adjustment calculations described below. The only exception will be for Collocation Percent Missed Due Dates.</p> <p>a. Large sample threshold is defined as $L = 9(B \times (1-B))$, rounded to the closest larger integer, where B is the benchmark. Large sample thresholds for some values of benchmarks are shown in the table below.</p> <table border="1"> <thead> <tr> <th>Benchmark B</th> <th>Large Sample Threshold L</th> </tr> </thead> <tbody> <tr> <td>90%</td> <td>100</td> </tr> <tr> <td>95%</td> <td>190</td> </tr> <tr> <td>96.5%</td> <td>267</td> </tr> </tbody> </table> <p>b. The Equivalent Minimal Benchmark for sample size $n=5$, $EB(5)$ is based on the smallest number of failures $k \leq n$, for which the cumulative binomial distribution $CBN(k,n,B)$ exceeds 5%. The failure allowance is at</p>	Benchmark B	Large Sample Threshold L	90%	100	95%	190	96.5%	267		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
Benchmark B	Large Sample Threshold L										
90%	100										
95%	190										
96.5%	267										

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

least 1 for small samples.

Nominal Benchmark	Equivalent Minimal Benchmark: EB(5)
90 th _n	60 th _n
95 th _n	80 th _n
96.5%	80%

c. For any CLEC sample size n between 5 and L, the Equivalent Benchmark EB(n) is calculated so that the adjustment percent decreases linearly from EB(5) for n = 5 to 0 for n=L, resulting in the following formula:

$$EB(n) = B - (B - EB(5)) \times (L - n) / (L - 5)$$

d. Effective Benchmark is equal to the nominal Benchmark for large samples and to the Equivalent Benchmark for small samples.

Small-Sample Size Table (95% Confidence)

Sample Size	Equivalent 90% Benchmark	Equivalent at 95% Benchmark	Sample Size	Equivalent 90% Benchmark	Equivalent 95% Benchmark
5	60.00%	80.00%	18	77.78%	83.33%
6	66.67%	83.33%	19	78.95%	84.21%
7	71.43%	85.71%	20	80.00%	85.00%
8	75.00%	85.00%	21	76.19%	85.71%
9	66.67%	77.78%	22	77.27%	86.36%
10	70.00%	80.00%	23	78.26%	86.96%

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

11	72.73%	81.82%	24	70.47%	87.50%
12	75.00%	83.33%	25	80.00%	88.00%
13	76.92%	84.62%	26	80.77%	88.46%
14	78.57%	85.71%	27	81.48%	88.89%
15	73.33%	86.67%	28	78.57%	89.29%
16	75.00%	87.50%	29	79.34%	86.21%
17	76.47%	82.35%	30	80.00%	86.67%

3. If the percentage (or equivalent percentage for small samples) meets the benchmark standard, no remedies are required. Otherwise, go to step 4.

4. Determine the Volume Proportion by taking the difference between the benchmark and the actual performance result.

5. Calculate the CLEC's Total Affected Volume (TAV) by multiplying the Volume Proportion from step 4 by the Total Impacted CLEC+ Volume.

6. Calculate the payment to CLEC+ by multiplying the result of step 5 by the appropriate dollar amount from the fee schedule (Appendix A, Table 1) times the appropriate multiplier (section 4.3.1.5). That is,

CLEC+'s payment = (CLEC's Total Affected Volume CLEC+ x \$\$ from Fee Schedule x multiplier). For the example that follows, fee amounts are based on an aggregate failure:

Rationale:

The large sample threshold L should be higher than 30 and dependent on the Benchmark value B : $L = 9 + (B * (1 - B))$. The tighter the benchmark, the larger the large sample threshold L should be. The formula comes from statistical methodology adopted for analog measures (D.2.4, bullet point (v)). Binomial model (with $p=B$) approximation applies only when $L > B * (1 - B) * 9$.

New adjustment construction criteria for small sample benchmark adjustments:

7. The adjustment percentage for $n=5$ is the same as in the current SEEM plan.

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
--------------	---	---	---------------------------------

	<p>13. The number of observations should be calculated with the units sample size.</p> <p>14. The number of observations should be calculated with the units sample size.</p> <p>15. The number of observations should be calculated with the units sample size. Currently it does not.</p> <p>16. The number of observations should be calculated with the units sample size. Currently it does not.</p>		
--	---	--	--

E.32.1	<p>Example: CLECI Percent Missed Due Dates for Collocations</p> <p>Submeasure Category = Collocation Failure Month = Month 1 CLEC Aggregate Result = Failed</p> <table border="1"> <thead> <tr> <th></th> <th>n</th> <th>Effect ive Benc hmar k</th> <th>PM DD c</th> <th>Volu me Prop ortio n</th> <th>Affe cted Vol ume</th> <th>Fee Sche dule</th> <th>Fee Mult iplic e</th> <th>Pay out</th> </tr> </thead> <tbody> <tr> <td>Stat e</td> <td>6 0 0</td> <td>≤ 95% On Time</td> <td>92 %</td> <td>.03</td> <td>18</td> <td>\$3.1 65</td> <td></td> <td>\$56. 970</td> </tr> </tbody> </table> <p>Payout for CLEC+ is (18 units) \times (\$3165/unit) \times (2 factor) = \$114,970.</p> <p>Rationale: Administrative change to change the symbols for mathematical operations to more concise version. Change reflects elimination of multipliers</p>		n	Effect ive Benc hmar k	PM DD c	Volu me Prop ortio n	Affe cted Vol ume	Fee Sche dule	Fee Mult iplic e	Pay out	Stat e	6 0 0	≤ 95% On Time	92 %	.03	18	\$3.1 65		\$56. 970		<p>Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.</p>
	n	Effect ive Benc hmar k	PM DD c	Volu me Prop ortio n	Affe cted Vol ume	Fee Sche dule	Fee Mult iplic e	Pay out													
Stat e	6 0 0	≤ 95% On Time	92 %	.03	18	\$3.1 65		\$56. 970													

E.43	<p>Tier-1 Calculation For Benchmarks (In The Form Of A Target)</p> <p>1. For each CLEC with five or more observations calculate monthly performance results for the State.</p>		<p>Area to be subject of PSC Workshop and ultimately staff</p>
-------------	---	--	---

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments																		
	<p>2. CLECs having observations (sample sizes) between 5 and 30 large sample threshold L will use small sample size table adjustments as described above.</p> <p>3. Calculate the interval distribution based on the same data set used in step 1.</p> <p>4. If the 'percent within' (or equivalent percentage for small samples) meets the benchmark standard, no remedies are required. Otherwise, go to step 5.</p> <p>5. Determine the Volume Proportion by taking the difference between benchmark and the actual performance result.</p> <p>6. Calculate the Total Affected Volume by multiplying the Volume Proportion from step 5 by the Total CLEC+ Volume.</p> <p>7. Calculate the payment to CLEC+ by multiplying the result of step 6 by the appropriate dollar amount from the fee schedule. That is, $CLEC+ \text{ payment} = CLEC's \text{ Total Affected Volume} \times \\$\\$ \text{ from Fee Schedule} \times \text{multiplier}$. For the example that follows, assume CLEC aggregate failure.</p> <p>Rationale: Change of language consistent with the proposed change of Benchmark, small sample threshold. Change reflects elimination of multipliers</p>		recommendation.																		
E.43.1	<p>Example: CLEC-1 Reject Interval – Fully Mechanized</p> <p>Submeasure Category = Ordering</p> <p>Failure Month = Month 1</p> <p>CLEC Aggregate Result = Failed</p> <table border="1" data-bbox="311 1117 978 1448"> <thead> <tr> <th></th> <th>n_c</th> <th>Effective Benchmark</th> <th>Reject Interval</th> <th>Volume Proportion</th> <th>Affected Volume</th> <th>Fee Schedule</th> <th>Fee Multiplier</th> <th>Payout</th> </tr> </thead> <tbody> <tr> <td>State</td> <td>60</td> <td>97% ≤ 1 hour</td> <td>95% ≤ 1 hour</td> <td>.02</td> <td>12</td> <td>\$20</td> <td></td> <td>\$240</td> </tr> </tbody> </table> <p>Payout for CLEC+ is $(12 \text{ units}) \times (\\$20/\text{unit}) \times (2.5 \text{ factor}) = \\$600-240$</p>		n_c	Effective Benchmark	Reject Interval	Volume Proportion	Affected Volume	Fee Schedule	Fee Multiplier	Payout	State	60	97% ≤ 1 hour	95% ≤ 1 hour	.02	12	\$20		\$240		Area to be subject of PSC Workshop and ultimately staff recommendation.
	n_c	Effective Benchmark	Reject Interval	Volume Proportion	Affected Volume	Fee Schedule	Fee Multiplier	Payout													
State	60	97% ≤ 1 hour	95% ≤ 1 hour	.02	12	\$20		\$240													

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Relative Benchmarking Specific to certain Tier 2 and Tier 3 companies and to the Tier 2 and Tier 3 companies in several states.</p> <p>Admin's have changed out of the Tier 2 and Tier 3 companies from their current status to Tier 2 and Tier 3.</p> <p>Change reflects combination of analyses.</p>		
E.5	<p>Tier 2 Calculations For Benchmarks</p> <p>Tier 2 calculations for benchmark measures are the same as the Tier 1 benchmark calculations, except they are based on the CLEC aggregate performance and the CLEC aggregate data will have failed for three (3) consecutive months.</p> <hr/> <p>Rationale:</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
E.6-1	<p>Regional and State Coefficients</p> <p>This section describes the method of calculating regional and state coefficients</p> <hr/> <p>Rationale:</p> <p>State Coefficients apply to Tier 2.</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
E.6.1	<p>AKC</p> <ul style="list-style-type: none"> • Acknowledgement Completeness (AKC, EDI & AKC TAG) • Regional Coefficient Formula (Tier 1) • Coefficient = (A+B) / (C+D) where: • A = number of valid FOC transactions of the CLEC in the state (fully & partially mechanized) 		<p>Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<ul style="list-style-type: none"> • -----B----- number of valid RI transactions of the CLEC in the state (fully & partially mechanized) • -----C----- total valid FOC transactions of the CLEC in the region (fully & partially mechanized) • -----D----- total valid RI transactions of the CLEC in the region (fully & partially mechanized) <p>State Coefficient Formula (Tier-2) State Coefficient = (A+B) / (C+D) where:</p> <ul style="list-style-type: none"> • -----A----- number of valid FOC transactions for all CLECs in the state (fully & partially mechanized) • -----B----- number of valid RI transactions for all CLECs in the state (fully & partially mechanized) • -----C----- total valid FOC transactions in the region (fully & partially mechanized) • -----D----- total valid RI transactions in the region (fully & partially mechanized) <hr/> <p>Rationale: Refer to SQM Measure for rationale Eliminate reference to Tier 2. Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		
E.6.2.1	<p><u>Percent Flow-Through Service Requests (FT)</u> <u>Regional Coefficient Formula (Tier-1)</u> Coefficient = A / B where:</p> <p><u>A = number of valid Flow Through transactions of the CLEC in the state;</u> <u>B = total valid Flow Through transactions of the CLEC in the region.</u></p> <p>Percent Flow Through CLEC Aggregate—Residence (PFT-RES) Percent Flow Through CLEC Aggregate—Business (PFT- BUS) Percent Flow Through CLEC Aggregate—UNE-L (includes UNE-L with LNP) Percent Flow Through CLEC Aggregate—LNP (PFT-LNP)</p>		<p>Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Regional Coefficient Formula (Tier-1) Coefficient = A / B where: A = number of valid FOC transactions of the CLEC in the state (fully mechanized) B = total valid FOC transactions of the CLEC in the region (fully mechanized)</p> <p>State Coefficient Formula (Tier-2) State Coefficient = A / B where:</p> <ul style="list-style-type: none"> • A = number of valid FOC transactions for all CLECs in the state (fully mechanized) • B = total valid FOC transactions in the region (fully mechanized) <hr/> <p>Rationale: PFT changes made to reflect SQM Disaggregation changes, removal of Tier-2, and efficient implementation of apportionment based on state flows through Eliminate reference to Tier 2 Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		
E.4.2	<p><u>Service Order Accuracy (SOA)</u> <u>Regional Coefficient Formula (Tier-1)</u> <u>Coefficient = A / B where:</u> <u>A = number of valid SOA transactions of the CLEC in the state;</u> <u>B = total valid SOA transactions of the CLEC in the region.</u></p> <hr/> <p>Rationale: SOA was omitted from this paragraph in prior versions of SEEM. Entry is to correct that omission and match current proposed measure.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
E.6.3	<p>CMN, PSEC, PCRAR, PCRIP Timeliness of Change Management (CMN) Percent of Software Errors Corrected in X (10, 30, 45) Business Days--Region (PSEC)</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Percent Change Requests Accepted or Rejected in 10 Days – Region (PCRAR)</p> <p>Percent of Change Request Implemented Within 60 Weeks of Prioritization Region (PCRIP)</p> <p>State Coefficient Formula (Tier 2)</p> <p>Coefficient = (A+B) / (C+D) where:</p> <p>A = number of valid FOC transactions for all CLECs in the state (fully & partially mechanized)</p> <p>B = number of valid RI transactions for all CLECs in the state (fully & partially mechanized)</p> <p>C = total valid FOC transactions in the region (fully & partially mechanized)</p> <p>D = total valid RI transactions in the region (fully & partially mechanized)</p> <hr/> <p>Rationale:</p> <p>Refer to SQM Measure for rationale</p> <p>Eliminate reference to Tier 2.</p> <p>Rationale for elimination of Tier 2 provided in proposed changes to SQM document.</p>		
E.6.4	<p>IA, OAAF</p> <ul style="list-style-type: none"> ● Interface Availability (IA) ● Average Answer Time – Ordering Centers (OAAF) <p>State Coefficient Formula (Tier 2)</p> <p>Coefficient = (A+B) / (C+D) where:</p> <ul style="list-style-type: none"> ● A = number of valid FOC transactions for all CLECs in the state (fully & partially mechanized) ● B = number of valid RI transactions for all CLECs in the state (fully & partially mechanized) ● C = total valid FOC transactions in the region (fully & partially mechanized) ● D = total valid RI transactions in the region (fully & partially mechanized) <hr/> <p>Rationale:</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:</p>		
Appendix F	<p><u>BellSouth AT&T's Policy on Reposting of Performance Data and Recalculation of SEEM Payments</u></p>		
	<p>BellSouth AT&T will be required to repost make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:</p> <ol style="list-style-type: none"> 1. Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics are subject to reposting. A notice will be placed on the <u>PMAP AT&T Performance Measurement website</u> advising CLECs when reposted data is available. 2. SQM Performance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting, <u>unless such a shift was caused by a single misclassified observation either in the numerator, denominator, or both.</u> 3. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an "out of parity" condition will be available for reposting whenever there is a $\geq 2\%$ decline in BellSouth's AT&T's performance at the sub-metric level, <u>unless such a shift was caused by a single misclassified observation either in the numerator, denominator, or both.</u> 4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of $\geq .5$ in the z-score at the sub-metric level. 5. Any data recalculations that reflect an improvement in BellSouth's AT&T's performance will be reposted at BellSouth's AT&T's discretion. However, statewide performance must improve by at least 2% for benchmark measures and the z-score must improve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting. 6. SQM Performance data will be reposted for a maximum of 	<p>BellSouth will make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:</p> <ol style="list-style-type: none"> 1. Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics are subject to reposting. A notice will be placed on the PMAP website advising CLECs when reposted data is available. 2. SQM Performance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting. 3. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an "out of parity" condition will be available for reposting whenever there is a $\geq 2\%$ decline in BellSouth's performance at the sub-metric level. 4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of $\leq .5$ in the z-score at the sub-metric level. 5. Any data recalculations that reflect an improvement in BellSouth's performance will be reposted at BellSouth's discretion. However, statewide performance must improve by at least 2% for benchmark measures and the z-score must improve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting. 6. SQM Performance data will be reposted for a maximum of three months, in areas from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, BellSouth will correct the data beginning with the month of detection (May) and the three months preceding (April, March and February). 7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate 	<p>Parties Agree. Noted below is the Plan language to which the parties agree except for resolution of Tier-II elimination that is highlighted.</p> <p>Appendix F: <u>BellSouth's AT&T's Policy on Reposting of Performance Data and Recalculation of SEEM Payments</u></p> <p>BellSouth AT&T will be required to repost make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:</p> <ol style="list-style-type: none"> 1. Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics to reposting. A notice will be placed on the <u>PMAP AT&T performance measurement website</u> advising CLECs when reposted data is available. 2. SQM Performance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting. 3. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>three months in arrears from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, BellSouth AT&T will correct the data beginning with the month of detection (May) and the three months preceding – April, March and February.</p> <p>7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth AT&T will recalculate applicable SEEM payments, where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of May, BellSouth AT&T will correct data for May and the three preceding months – April, March and February.</p> <p>8. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 and Tier 2 remedies will be made at BellSouth's AT&T's discretion.</p> <p>9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.</p> <p>When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting BellSouth AT&T to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items 3, 4, or 5 have been met at the CLEC-specific level.</p> <p>Rationale: Remove reference to PMAP and PARIS to allow flexibility in the event platform changes in the future. Omission or addition of one transaction may change the outcome for the state metrics if the sample size is small. However such a change is hardly material, especially that SQM Equity determination is based on totally</p>	<p>applicable SEEM payments where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of May, BellSouth will correct data for May and the three preceding months – April, March and February.</p> <p>8. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 and Tier 2 remedies will be made at BellSouth's discretion.</p> <p>9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.</p> <p>When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting BellSouth to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items 3, 4, or 5 have been met at the CLEC-specific level.</p>	<p>"out of parity" condition will be available for reposting whenever there is a >=2% decline in BellSouth's AT&T's performance at the sub-metric level.</p> <p>4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of >= .5 in the z-score at the sub-metric level.</p> <p>5. Any data recalculations that reflect an improvement in BellSouth's AT&T's performance will be reposted at BellSouth's AT&T's discretion. However, statewide performance must improve by at least 2% for benchmark measures and the z-score must improve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting.</p> <p>6. SQM Performance data will be reposted for a maximum of three months in arrears from implementation of the change of programming request requirement (RQ) which corrects a detected error date of detection. RQs shall not be unreasonably delayed after the date the error is detected. As an example, should an error be discovered during the analysis of the May data month performance that triggers a reposting, and this error triggers a reposting but the RQ correcting the error is implemented in the calendar month of July with the June data month performance reports, BellSouth AT&T will correct the data beginning with the month of the RQ implementation (July) detection (May), which would be for the June data month performance reports, and will repost the data month performance reports for the three months preceding data month performance reports – May, April, and March and February.</p> <p>7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth AT&T will recalculate applicable SEEM payments, where technically feasible, for a maximum of</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Direct costs or costs that exceed the SEEM plan amount or obligations that are recalculated every time a change is discovered and a new modified change basis is determined based on SEEM reporting criteria. To provide further details.</p> <p>Accounting of Tier 2 - underpayment errors in prior cycle SEEM plan.</p> <p>This condition is not a true measure of performance levels. The same numerical criteria for improvement of performance as for deterioration of performance are much harder to achieve while moving towards the heavier part of the distribution.</p> <p>Eliminate reference to Tier 2</p> <p>Repeal or elimination of Tier 2 provided in proposed changes to SQM document</p> <p>Remove reference to specific system to allow flexibility for possible future platform changes</p>		<p>three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of <u>June</u> <u>May</u>, BellSouth-AT&T will correct data for May and the three preceding months - <u>May</u>, <u>April</u>, and <u>March</u> and <u>February</u>.</p> <p>8. Any adjustments for underpayment of Tier 1 <u>Tier-1</u> and Tier 2 calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 <u>Tier-1</u> and Tier 2 remedies will be made at BellSouth-AT&T's discretion.</p> <p>9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.</p> <p>When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting BellSouth-AT&T to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items <u>3</u> <u>or</u> <u>4</u> <u>or</u> <u>5</u> have been met at the CLEC-specific level.</p>
	<p>Determination of when Reposting Policy Applies</p> <p>As part of the Change Notification Process, BellSouth-AT&T performs an</p>		<p>Parties Agree.</p>

SEEM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>analysis of impacts that are proposed to be made to Performance Measurement Application Platform (PMAP) code. These impacts are used to identify changes to its reported SQM results.</p> <p>To determine this impact, BellSouth AT&T performs a query of the data warehouse to identify those records that would be impacted by the proposed change. Once the number of records are identified, the measurement is recalculated to determine the impact. This is the general framework for analysis - the specific steps used to evaluate the impact will vary with the issue being analyzed. However, the following example may assist in understanding:</p> <p>Assume that service orders were erroneously being included in a particular product disaggregation for Percent Missed Installation Appointments. They should have been in another product disaggregation. Further, assume that the number of records erroneously included is 110 records out of a total of 86,000. In this example, the numerator and denominator would both be reduced by 110 records and the PMAP Score would be recalculated. If the amount of the change was sufficient to meet criteria 2, 4 or 5 above, the Reposting policy will be invoked.</p> <hr/> <p>Rationale</p> <ul style="list-style-type: none"> Remove reference to PMAP to allow flexibility in the event platform changes in the future. 		
End of SEEM Section			

Proposed Florida SQM Plan

AT&T and CLECs Joint Matrix

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
<p>Introduction</p>	<p>BellSouth AT&T Service Quality Measurement (SQM) Plan (SQM) describes in detail the measurements produced to evaluate the quality of service delivered to BellSouth AT&T's wholesale customers. The SQM was developed to respond to the requirements of the Communications Act of 1996 Section 251 (96 Act) which required BellSouth AT&T to provide non-discriminatory access to Competitive Local Exchange Carriers (CLEC)¹. The reports produced by the SQM provide regulators, CLECs and BellSouth AT&T the information necessary to monitor the delivery of non-discriminatory access.</p> <p>This plan results from the many divergent forces evolving from the 96 Act. This specific SQM is based on Order No. PSC-07-0286 PAA-TP TBD issued by the Florida Public Service Commission (FPSC) on April 3, 2007 TBD in Docket No. 000121A-TP, and as confirmed by Consummating Order No. PSC-07-0395 CO-TP, issued by the FPSC on May 7, 2007 and modifications resulting from the implementation of QSS architecture changes on April 19, 2008.</p> <p>Rationale:</p> <ul style="list-style-type: none"> Throughout the SQM development process, other changes were made to the BellSouth AT&T Administrative change that will be made to reflect the current state of order to be issued at close of the review. 		<p>Parties Agree.</p>
<p>Report Publication Dates</p>	<p>Each month, preliminary SQM reports will be posted to BellSouth's PMAP AT&T's performance measurement website (http://pmap.bellsouth.com) by 8:00 AM EST on the 21st day of each month or the first business day after the 21st. The reports will contain information collected in each performance category and will be available to CLEC via the AT&T website. AT&T will also provide electronic access to the raw data underlying the SQM subject to the retention period. The final validated SQM reports will be posted by 8:00 AM on the last day of the month or the first business day after the last day of the month.</p> <p>For details on SEEM, please refer to the SEEM Administrative Plan.</p> <p>BellSouth AT&T shall retain the performance measurement Supporting Data Files (SDF) for a period of 18 months and further retain the monthly reports produced in PMAP for a period of three years. Instructions for</p>		<p>Parties Agree:</p> <p>AT&T agrees to keep the URL reference on this page and references as "AT&T performance measurement website" on all other pages where this URL applies.</p>

¹ Alternative Local Exchange Companies (ALEC) and Competing Local Providers (CLP) are referred to as Competitive Local Exchange Carriers (CLEC) in this document.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>replicating the reports in the SQM are contained in the Supporting Data User Manual (SDUM). The SDUM is available on the <u>PMAP performance measurement AT&T website</u> and is automatically provided with each SDF download.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • <u>Insert additional references to PMAP website to support the delivery of the SDUMs to the CLECs.</u> • <u>Insert additional language on SEEM Plan for clarification of the performance reporting cycle.</u> • <u>Remove all references to SEEM to reflect AT&T's compliance transition to the new interLATA plan.</u> 		
Report Delivery Methods	<p>CLEC SQM and SEEM reports will be considered delivered when posted to the <u>AT&T performance measurement website</u>. The State/Federal Commissions have been given access to the website.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • <u>Remove all references to SEEM to reflect AT&T's process transition to the new interLATA plan.</u> 		Parties Agree.
Change of Law	<p><u>Upon a particular Commission's issuance of an Order pertaining to the Service Quality Measurement (SQM) Plan in a proceeding expressly applicable to all CLECs, AT&T shall implement such plan covering its performance for the CLECs, as well as any changes to that plan ordered by the Commission, on the date specified by the Commission. If a change of law occurs which may change AT&T's obligations, parties may petition the Commission within 30 days to seek changes to the SQM Plan in accordance with such change of law. Performance measurements that have been ordered by the Commission can currently be accessed via the AT&T website. Should there be any difference between the SQM Plan on AT&T's website and the plan the Commission has approved as filed in compliance with its orders, the Commission-approved compliance plan will supersede as of its effective date.</u></p> <p>Rationale:</p> <ul style="list-style-type: none"> • <u>Insert additional language from SEEM Plan for Change of Law application within the Performance Plan.</u> 		Parties Agree.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
<p><u>Administrative Changes</u></p>	<p><u>A workshop and/or conference shall be organized and held periodically for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative.</u></p> <p><u>AT&T may make administrative changes that do not substantively change the SQM Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes.</u></p> <p>Rationale:</p> <ul style="list-style-type: none"> • Proposing change annual review to period as needed • Clarify language to modify the SQM Plan for administrative changes that do not substantively change the plan to simplify administration of the plan and ensure documentation that is compliant with the existing OSS systems and processes. 		<p>Area for further negotiations by parties.</p> <p>Noted below is the Plan language currently under negotiation by the parties.</p> <p><u>A workshop and/or conference shall be organized and held periodically or at the request of either party for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodical workshop with AT&T and other CLECs and state regulatory authority representative.</u></p> <p><u>AT&T may make administrative changes that do not substantively change the SQM Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes. An administrative change is one that corrects typographical, spelling, grammatical, or computational errors, updates website addresses and incorporates modifications to architecture implemented in an OSS release following the approved Change Management process. Administrative changes will not change the intent or the plan language of the document.</u></p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

<p>Contents</p> <p>Section 1: Operations Support Systems (OSS)</p> <p>OSS-1 [ARI]: OSS Response Interval (Pre-Ordering Ordering Maintenance & Repair).....</p> <p>OSS-2 [IA]: OSS Interface Availability (Pre-Ordering Ordering Maintenance & Repair).....</p> <p>PO-2 [LMT]: Loop Makeup - Response Time - Electronic.....</p> <p>Section 2: Ordering</p> <p>O-2 [AKC]: Acknowledgement Message Completeness.....</p> <p>O-3 [FT]: Percent Flow-Through Service Requests.....</p> <p>O-8 [RI]: Reject Interval.....</p> <p>O-9 [FOCT]: Firm Order Confirmation Timeliness.....</p> <p>O-11 [FOCC]: Firm Order Confirmation and Reject Response Completeness.....15</p> <p>O-12 [OAAT]: Average Answer Time - Ordering Centers.....</p> <p>Section 3: Provisioning</p> <p>P-1 [HOI]: Held Order Interval.....</p> <p>P-2A [PJ48]: Percentage of Orders Given Jeopardy Notices >= 48 Hours 2018</p> <p>P-2B [PJ]: Percentage of Orders Given Jeopardy Notices.....</p> <p>P-3 [MIA]: Percent Missed Installation Appointments.....</p> <p>P-4 [OCI]: Order Completion Interval (OCI).....</p> <p>P-5 [CNI]: Average Completion Notice Interval.....</p> <p>P-7 [CCI]: Coordinated Customer Conversions - Hot Cut Duration 3027</p> <p>P-7A [CCT]: Coordinated Customer Conversions - Hot Cut Timeliness Percent within Interval.....</p> <p>P-7B [CCRT]: Coordinated Customer Conversions - Average Recovery Time.....<u>32</u></p> <p>P-7C [CPI]: Hot Cut Conversions - Percent Provisioning Troubles Received within 3 Days of a Completed Service Order.....</p> <p>P-7D [NCDD]: Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date.....</p>	<p><u>NEW</u> Average Time Required to Update 911 Database (Facility Based Providers)</p> <p><u>NEW</u> Percent 911 Database Accuracy</p>	<p>Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.</p>
--	---	---

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>P-9 [PPT]: Percent Provisioning Troubles within "X" Days of Service Order Completion.....</p> <p>P-11 [SOA]: Service Order-Accuracy</p> <p>P-13B [LOOS]: LNP-Percent Out of Service < 60 Minutes.....</p> <p>P-13C [LAT]: LNP-Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date.....</p> <p>P-13D [LDT]: LNP-Disconnect Timeliness (Non-Trigger).....</p> <p>Section 4: Maintenance & Repair</p> <p>M&R-1 [MRA]: Percent Missed Repair Appointments4235</p> <p>M&R-2 [CTRR]: Customer Trouble Report Rate <u>Net of Provisioning Trouble and Repeat Reports</u>.....4437</p> <p>M&R-3 [MAD]: Maintenance Average Duration.....4639</p> <p>M&R-4 [PRT]: Percent Repeat Customer Troubles within 30 Calendar Days4841</p> <p>M&R-5 [OOS]: Out of Service (OOS) > 24 Clock Hours...5043</p> <p>M&R-6 [MAAT]: Average Answer Time - Repair Centers...5245</p> <p>Section 5: Billing</p> <p>B-1 [BIA]: Invoice Accuracy.....53</p> <p>B-2 [BIT]: Mean Time to Deliver Invoices.....54</p> <p>B-5 [BU DT]: Usage Data Delivery Timeliness.....55</p> <p>B-10 [BEC]: Percent Billing Adjustment Requests (BAR) Responded to within 10 Business Days.....56</p>	<p><u>NEW 911- Average Time to Clear Errors</u></p> <p><u>NEW Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs</u></p> <p><u>NEW Directory Assistance- Database Update Accuracy</u></p> <p><u>NEW Percentage of Electronic Updates that Flow Through the DSR process Without Manual Intervention</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Section 6: Trunk Group Performance</p> <p>TGP-1 [TGP]: Trunk Group Performance.....<u>5746</u></p> <p>Section 7: Collocation</p> <p>C-1 [ART]: Collocation Average Response Time.....59</p> <p>C-2 [AT]: Collocation Average Arrangement Time.....60</p> <p>C-3 [MDD]: Collocation Percent of Due Dates Missed.....<u>6448</u></p> <p>Section 8: Change Management</p> <p>CM-1 [NT]: Timeliness of Change Management Notices.....62</p> <p>CM-3 [DT]: Timeliness of Documentation Associated with Change.....63</p> <p>CM-5 [ION]: Notification of CLEC Interface Outages.....64</p> <p>CM-6 [SEC]: Percentage of Software Errors Corrected in "X" Business Days<u>6549</u></p> <p>CM-7 [CRA]: Percentage of Change Requests Accepted or Rejected within 10 Business Days.....66</p> <p>CM-8 [CRR]: Percent Change Requests Rejected.....67</p> <p>CM-9 [NDPR]: Number of Defects in Production Releases (Type 6 CRs).....68</p> <p>CM-10 [SV]: Software Validation.....69</p> <p>CM-11 [SCRH]: Percentage of Software Change Requests Implemented within 60 Weeks of Prioritization.....70</p> <p>CM-11A [PCRI]: Average Time to Implement Process Change Requests.....71</p> <p>Run-rule: Refer to individual Metric and Appendix for rationale.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Appendix A: Glossary of Acronyms and Terms.....<u>7250</u></p> <p>Appendix B: BellSouth AT&T Audit and Dispute Resolution Policy<u>8260</u></p> <p>Appendix C: OSS Interface Table<u>8361</u></p> <p>Appendix D: AT&T BellSouth's Policy on Reposting of Performance Data and Recalculation of SFEM Payments.....<u>8664</u></p> <p>Appendix E: Description of Raw Data and Other Supporting Data Files.....<u>8866</u></p> <p>Appendix F: BellSouth PMAP Data Notification Process.....<u>91</u></p> <p>Appendix G: SQM Equity Determination.....<u>9269</u></p> <p>Appendix H: Special Access Measurements.....<u>93</u></p> <p>Rationale:</p> <ul style="list-style-type: none"> • Refer to individual Metric and Appendix for rationale. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM#	Measure Category Code	Title of the Measure	Operations Support Systems (OSS)
OSS-1	ARI	OSS Response Interval (Pre-Ordering Ordering Maintenance & Repair)	
Exclusions		<p>Exclusions</p> <ul style="list-style-type: none"> • Syntactically Incorrect queries • Scheduled OSS Maintenance • Test Transactions/Records <p>BellSouth may exclude transactions submitted by an individual CLEC that are an unanticipated significant increase in the monthly volume of transactions submitted by that individual CLEC. This exclusion will only be applied when the individual CLEC's transactions are directly attributable to a failure of the SQM measure. An unanticipated, significant increase in CLEC volume is indicated by either a 100% increase over the individual CLEC's forecasted volumes or over the average of the normalized volumes for the most recent prior six months. BellSouth will notify the individual CLEC whose transactions caused this exclusion to be invoked, and will provide general notification to CLECs that such transactions were excluded.</p>	Area to be subject of PSC Workshop and ultimately staff recommendation.
Business Rules	<p>OSS Response Interval is designed to monitor the time required for the CLEC and BellSouth AT&T interface systems to obtain, from BellSouth's AT&T's legacy systems, the information required to handle Pre-Ordering/Ordering/Maintenance and Repair functions. The clock starts on the date and time when the request is received on the BellSouth AT&T side of the interface and the clock stops when the appropriate response has been transmitted through the same point to the requester.</p> <p>The average response interval for retrieving Pre-Ordering/Ordering/Maintenance & Repair information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month.</p> <p>The following systems are observed in the Pre-Ordering/Ordering OSS Response Interval measurement: RSAG-Address, RSAG-TN, ATLAS, COFFI, DSAP, and CRIS. The following systems are observed in the Maintenance and Repair OSS Response Interval measurement: CRIS, DLETH, DLR, LMOS, LMOSupd, LNP Gateway, MARCH, OSPCM, Predictor, SOCS, and NIW.</p>	<p>Business Rules</p> <p>OSS Response Interval is designed to monitor the time required for the CLEC and BellSouth interface systems to obtain, from BellSouth's legacy systems, the information required to handle Pre-Ordering/Ordering/Maintenance and Repair functions. The clock starts on the date and time when the request is received on the BellSouth side of the interface and the clock stops when the appropriate response has been transmitted through the same point to the requester.</p> <p>The average response interval for retrieving Pre-Ordering/Ordering/Maintenance & Repair information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month.</p> <p>The following systems are observed in the Pre-Ordering/Ordering OSS Response Interval measurement: RSAG-Address, RSAG-TN, ATLAS, COFFI, DSAP, LASR, Verigate and CRIS. The following systems are observed in the Maintenance and Repair OSS Response Interval measurement: CRIS, DLETH, DLR, LMOS, LMOSupd, LNP Gateway,</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Propose Disaggregation into 3 separate elements: preordering, ordering, and maintenance.</p> <p>Should other interfaces as shown in AT&T diagram, i.e. BOG, SGG, LESOG, LNP, DDC, PRE be included in this measure?</p>	<p>MARCH, OSPCM, Predictor, SOCS, and NIW.</p> <p><u>Propose Disaggregation into 3 separate elements: preordering, ordering, and maintenance.</u></p> <p><u>Should other interfaces as shown in AT&T diagram, i.e. BOG, SGG, LESOG, LNP, DDC, PRE be included in this measure?</u></p>	
<p>SQM Disaggregation - Analog/Benchmark</p>	<p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <p>Legacy System/Interface</p> <p>Pre-Ordering/Ordering OSS Response Average Interval</p> <p>Regional Level.....<u>Direct</u> <u>Comparison with Retail + 2 seconds</u></p> <p>Maintenance & Repair OSS Response Average Interval</p> <p>Regional Level, Per OSS Interface.....<u>Direct</u> <u>comparison with Retail +1 second</u></p> <p>(See Appendix C: OSS Interface Tables)</p> <p>Rationale:</p> <p>Administrative change for clarity</p>		
<p>SEEM Measure</p>	<p>SEEM Tier I Tier II</p> <p>Yes.....<u>X</u></p> <p>Rationale:</p> <p>Local markets irreversibly open.</p> <p>Thirteen years since passage of 96 Telecom Act.</p> <p>Tier 2 incentive to prevent backsliding no longer needed.</p>	<p>SEEM Measure</p> <p>SEEM Tier I Tier II</p> <p>Yes <u>X</u>.....<u>X</u></p> <p>[Comment: Given the new 22 state architecture it is <u>important to be able to clearly see each area of the OSS on a by system basis. LASR continues to introduce defects which delay or require workarounds and needs to be</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>We spent time reading the very complex and difficult to read version of the proposed changes. The changes are very complex and difficult to read. We have reviewed the changes and have identified several areas that need to be clarified. We have identified several areas that need to be clarified. We have identified several areas that need to be clarified.</p> <p>System problems are frequent</p>	<p><u>carefully examined</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

Operations Support Systems (OSS)

SQM#	Measure Category Code	Title of the Measure
OSS-2	IA	OSS Interface Availability (Pre-Ordering Ordering Maintenance & Repair)

<p>Definition</p>	<p>Percent of time OSS interface is functionally available compared to scheduled availability. Availability percentages for CLEC interface and for all Legacy systems accessed by them are captured. ("Functional Availability" is the amount of time in hours during the reporting period that the legacy systems are available to users. The planned System Scheduled Availability is the time in hours per day that the legacy system is scheduled to be available.)</p> <p>Scheduled availability is posted on the interconnection AT&T website: (http://www.interconnection.bellsouth.com/oss/oss_hour.html)</p> <p>Rationale:</p> <ul style="list-style-type: none"> Removal of specific URL to provide system platform flexibility for possible future reorganizations. 		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
<p>Calculation</p>	<p>OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair) = (a / b) X 100</p> <p>a = Functional Availability in Minutes b = Scheduled Availability in Minutes</p> <p>Rationale:</p> <ul style="list-style-type: none"> Throughout the SQM document the mathematical operator representing multiplication has been corrected to a "*" rather than "x" or "X". 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	<p>SEEM _____ Tier I _____ Tier II</p> <p>Yes _____ X</p> <p>AT&T</p> <ul style="list-style-type: none"> • Remove all references to "Tier I" and "Tier II" in the text and move all references to "Tier I" and "Tier II" to the text. • Update Tier I references: <ul style="list-style-type: none"> local markets increasingly open. Protect your share passage of 90% Telephony Act Handle all other to prevent backsliding in Tier I areas. 	<p>SEEM Measure</p> <p>SEEM _____ Tier I _____ Tier II</p> <p>Yes <u>X</u> _____ X</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Operations Support Systems (OSS)	
PO-2	LMT	Loop Makeup- Response Time -- Electronic		
Calculation	<p>Response Interval = (a - b) a = Date and time the LMUSI returned to CLEC b = Date and time the LMUSI is received</p> <p>Percent within Interval = (c / d) X 100 c = Total LMUSIs received within the interval d = Total number of LMUSIs processed within the reporting period</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Have them in the SQM document, the mathematical operation representing multiplication has been corrected to "X" rather than "*" or "V". 			Parties Agree except for resolution of Tier-II elimination that is highlighted.
Report Structure	<ul style="list-style-type: none"> • CLEC Aggregate • CLEC Specific • Geographic Scope <ul style="list-style-type: none"> - State <p>Interval for electronic LMUSIs: 0 - 1 minute</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Removed duplicate of standard interval value that is already included within the Benchmark section of this measure 			
SEEM Measure	<p>SEEM ----- Tier I ----- Tier II Yes ----- X ----- X</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. • Eliminate Tier I remedies from the plan. <p>• \$240 paid to one CLEC in Florida for Tier I remedies over past 12 months, June 2008 to May 2009, with all of that in</p>			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Priority rate change CLEC</p> <ul style="list-style-type: none"> • Rate change Model on yallom with the rate as a function of a function of CLEC's priority rate set • Increase Tier 2 bundles <ul style="list-style-type: none"> • local markets – 2005 only once • 11-year since passage of 96 Telecomp Act • Tier 2 incentive to prevent backsliding no longer needed • AT&T consistently provides a high level of performance <ul style="list-style-type: none"> • Average performance for past 12 months (96-08-01-08-31) was 99.43% • No Tier 2 bundles increased in the past 12 months period 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Ordering	
0-2	AKC	Acknowledgement Message Completeness		
Definition		<p>This measure provides the percent of transmissions/LSRs received via ordering interface gateways, which are acknowledged electronically.</p> <ul style="list-style-type: none"> • BellSouth • CLEC's use of EDI to submit LSRs • TETL would rarely provides a high level of performance. Average order cycle for past 12 months (06/08 to 05/09) was 100% • Number of remedies incurred over past 12 months • Average of remedies incurred over past 12 months • Messages can follow process of (1) Order Confirmation or (2) Order Notification, as measured by O-8 and O-9 metrics. • OSS 2, OSS Interface Availability, captures acknowledgement issues due to system functionality and availability. 	<p>Definition</p> <p>This measure provides the percent of transmissions/LSRs received via ordering interface gateways or <u>e-mail</u>, which are acknowledged electronically.</p>	Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions		<ul style="list-style-type: none"> • Manually Submitted LSRs • Test Transactions/Records 	<p>Exclusions</p> <ul style="list-style-type: none"> • Manually Submitted LSRs • Test Transactions/Records 	
Business Rules		<p>Ordering interface gateways send Functional Acknowledgements for all transmissions/LSRs, which are electronically submitted by a CLEC. Users of EDI may package many LSRs from multiple states in one transmission. If more than one CLEC uses the same ordering center, an Acknowledgement Message will be returned to the "Aggregator", however, BellSouth will not be able to determine which specific CLEC this message represented.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Acknowledgement Completeness — $(a - b) \times 100$</p> <p>a— Total number of Functional Acknowledgements returned in the reporting period for transmissions LSRs electronically submitted by ordering interface gateways, respectively</p> <p>b— Total number of electronically submitted transmissions LSRs received in the reporting period by ordering interface gateways, respectively</p>		
Report Structure	<ul style="list-style-type: none"> • CLEC Aggregate • CLEC Specific • Geographic Scope Region 		
SQM Disaggregation-- Analog/Benchmark	<p>SQM Level of Disaggregation.....SQM/SEEM Analog/Benchmark</p> <ul style="list-style-type: none"> • Acknowledgments Benchmark: 99.75% 		
SEEM Measure	<p>SEEM ———— Tier I ———— Tier II</p> <p>Yes ———— X ———— X</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure
O-3	FT	Percent Flow-Through Service Requests

Ordering

<p>Business Rules</p>	<p>The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) submitted through one of the mechanized ordering interface gateways, that flow through and reach a status for a FOC to be issued, without manual intervention. These LSRs can be divided into two classes of service: Business and Residence, and two types of service: Resale and Unbundled Network Elements (UNE). The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example: fax and courier) or are not designed to flow through (for example: Planned Manual Fallout).</p> <p>Fatal Rejects: Errors that prevent an LSR, submitted electronically by the CLEC, from being processed initially. When an LSR is submitted by a CLEC, source systems will perform basic edit checks to ensure the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, source systems will reject the LSR and the CLEC will receive a Fatal Reject.</p> <p>Auto-Clarification: Clarifications that are mechanically returned to the CLEC due to invalid data entry within the LSR. Edits contained within the source systems will perform data validity checks to ensure the data within the LSR is complete and accurate. For example, if the address on the LSR is not valid according to RSAG, or if the LNP is not available for the NPA NXX requested, the CLEC will receive an Auto-Clarification.</p> <p>Planned Manual Fallout*: Fallout that occurs by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the LCSC. When a CLEC submits an LSR, the source systems will determine if the LSR should be forwarded to LCSC LSC for manual handling.</p> <p>*See LSR Flow-Through Matrix on BellSouth's AT&T's PMAP performance measurement website (http://pmap.bellsouth.com) in the Documentation/Exhibits folder for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through</p> <p>Total System Fallout: Errors that require manual review by the LCSC to determine if the error is caused by the CLEC, or is due to BellSouth system functionality. If it is determined the error is caused by the CLEC, the LSR</p>	<p>Business Rules</p> <p>The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) submitted through one of the mechanized ordering interface gateways, that flow through and reach a status for a FOC to be issued, without manual intervention. These LSRs can be divided into two classes of service: Business and Residence, and two types of service: Resale and Unbundled Network Elements (UNE). The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example: fax and courier) or are not designed to flow through (for example: Planned Manual Fallout).</p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
------------------------------	---	--	---

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments																				
	<p>will be sent back to the CLEC for clarification. If it is determined the error is due to BellSouth <u>AT&T</u> system functionality, the LCSC <u>LSC</u> representative will correct the error and the LSR will continue to be processed.</p> <p>Z Status: LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR.</p> <p>Discussion:</p> <ul style="list-style-type: none"> • Name change from BellSouth to AT&T and Local Center Service Center (LCSC) to Local Service Center (LSC) • Remove reference to PMAP to allow flexibility in the event of platform changes in the future. • Remove reference to a specific URL to allow flexibility in the event of future platform changes. 																						
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation SQM/SEEM Analog/Benchmark <table border="0"> <tr> <td>Residence</td> <td>Benchmark:</td> <td>95%</td> </tr> <tr> <td>Business</td> <td>Benchmark:</td> <td>90%</td> </tr> <tr> <td>UNE-L (includes UNE-L with LNP)</td> <td>Benchmark:</td> <td>85%</td> </tr> <tr> <td>LNP</td> <td>Benchmark:</td> <td>95%</td> </tr> </table>	Residence	Benchmark:	95%	Business	Benchmark:	90%	UNE-L (includes UNE-L with LNP)	Benchmark:	85%	LNP	Benchmark:	95%	SQM Disaggregation - Analog/Benchmark <table border="0"> <tr> <td colspan="2">SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</td> </tr> <tr> <td>Residence</td> <td>Benchmark: 98%_95</td> </tr> <tr> <td>Business</td> <td>Benchmark: 95%_90</td> </tr> <tr> <td>UNE-L (includes UNE-L with LNP)</td> <td>Benchmark: 90%_95</td> </tr> </table>	SQM Level of Disaggregation SQM/SEEM Analog/Benchmark		Residence	Benchmark: 98%_95	Business	Benchmark: 95%_90	UNE-L (includes UNE-L with LNP)	Benchmark: 90%_95	
Residence	Benchmark:	95%																					
Business	Benchmark:	90%																					
UNE-L (includes UNE-L with LNP)	Benchmark:	85%																					
LNP	Benchmark:	95%																					
SQM Level of Disaggregation SQM/SEEM Analog/Benchmark																							
Residence	Benchmark: 98%_95																						
Business	Benchmark: 95%_90																						
UNE-L (includes UNE-L with LNP)	Benchmark: 90%_95																						

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Flow Through Benchmark 99%</p> <p>Rationale:</p> <ul style="list-style-type: none"> • The proposed measure is needed to ensure that the 99% benchmark is not used to justify rate increases for Resale Business. • The benchmark proposed is an adjustment to the 99% benchmark used to set rates for Resale Business. 	<p>LNP Benchmark 98%_05</p>	
<p>SEEM Measure</p>	<p>SEEM Tier I Tier II</p> <p>Yes X X</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Remove all rate cases in SEEM related to LNP's proposed transition to a non-erected remedy plan. • Eliminate Tier 2 remedies. • Local markets irreversibly open. • Thirteen years since passage of the Telecom Act. • Tier 2 incentive to prevent backsliding is no longer needed. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure
O-8	RI	Reject Interval

Ordering

Exclusions	<ul style="list-style-type: none"> Service requests canceled by CLEC prior to being rejected/clarified Fatal Rejects LSRs identified as "Projects" with the exception of valid "Project IDs" for Bulk Migration Scheduled OSS Maintenance Test Transaction Records <p>Rationale:</p> <ul style="list-style-type: none"> Project exclusion for bulk migration was related to UNEP to Resale conversion. Deadline for UNEP conversion has passed. <p>Measure for Bulk Migration was implemented in anticipation of sales volume shift from UNEP to UNEP conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 0 in February, 52 in March (27 for a single CLEC), 0 in April, all for that same CLEC, and 0 in May.</p>
-------------------	--

Exclusions

- Service requests canceled by CLEC prior to being rejected/clarified
- Fatal Rejects
- LSRs identified as "Projects" with the exception of valid "Project IDs" for Bulk Migration (except those associated with a M&A transaction)
- Scheduled OSS Maintenance
- Test Transaction Records

Parties Agree except for resolution of Tier-II elimination and LSRs submitted via e-mail and Non-Mechanized categorization that is highlighted.

CLECs withdraw M&A transactions request for Exclusions.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
<p>Business Rules</p>	<p>Service Requests are considered valid when submitted by the CLEC and pass edit checks to ensure the data received is correctly formatted and complete. When there are multiple rejects on a single LSR, the first reject issued is used for the calculation of the interval duration.</p> <p>For Partially Mechanized and Non-Mechanized LSR ASRs, only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR ASR until normal closing of the center, if an LSR ASR is worked using overtime hours. In the case of a partially mechanized LSR ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the Interconnection AT&T website, (http://www.interconnection.bellsouth.com/centers).</p> <p>Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until the LSR is rejected (date and time stamp of reject in ordering interface gateways). Auto Clarifications are considered in the Fully Mechanized category.</p> <p>Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until the LCSC LSC Service Representative clarifies the LSR back to the CLEC via ordering interface gateways.</p> <p>Non-Mechanized: The elapsed time from receipt of a valid LSR not submitted via electronic ordering systems (date and time stamp of FAX or date and time paper LSRs are received in the LCSC <u>Email</u>) until notice of the reject (clarification) is returned to the CLEC via FAX Server <u>Email</u>.</p>	<p>Business Rules</p> <p>Service Requests are considered valid when submitted by the CLEC and pass edit checks to ensure the data received is correctly formatted and complete. When there are multiple rejects on a single LSR, the first reject issued is used for the calculation of the interval duration.</p> <p>For Partially Mechanized and Non-Mechanized LSR ASRs, only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR ASR until normal closing of the center, if an LSR ASR is worked using overtime hours. In the case of a partially mechanized LSR ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the Interconnection website: (http://www.interconnection.bellsouth.com/centers).</p> <p>Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until the LSR is rejected (date and time stamp of reject in ordering interface gateways). Auto Clarifications are considered in the Fully Mechanized category.</p> <p><u>Comment: The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?</u></p> <p>Non-Mechanized: The elapsed time from receipt of a valid LSR not submitted via electronic ordering systems (date and time stamp of FAX or date and time paper LSRs are received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via FAX Server.</p> <p>Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until the LCSC Service Representative clarifies the LSR back to the CLEC via ordering interface gateways.</p> <p>Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).</p>	<p>Parties Agree that AT&T will include the website for hours of operations.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).</p> <p>Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time stamp" from the receipt of the original Global Request.</p> <p>Rationale</p> <ul style="list-style-type: none"> • Update to remove URL reference <p>Currently the V&I Pre-Ordering & Ordering Center (named the Carrier Service Center (CSC)) not local</p> <ul style="list-style-type: none"> • Carrier Service Center (CSC) • Email is current method for delivery of manual requests • Project evolution for bulk migration was related to UNE-P to Resale conversion. • Deadline for UNE-P conversion has passed. <p>Measure for Bulk Migration was implemented in anticipation of high volumes of UNE-P to UNE-Loop conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 0 in February, 52 in March (27 for a single CLEC), 30 in April (all for that same CLEC), and 0 in May</p>	<p>Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time-stamp" from the receipt of the original Global Request.</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Reject Interval = (a - b) a = Date and time of service request rejection b = Date and time of service request receipt</p> <p>Percent within Interval = (c ÷ d) X 100 c = Service requests rejected in reported interval d = Total service requests rejected in report period</p> <p>Rationale:</p> <ul style="list-style-type: none"> Throughout the SQM document, the mathematical operator representing multiplication has been corrected to a "X" rather than "*" or "X". 		
Report Structure	<p>One report with the following four Disaggregation Levels and their associated interval buckets:</p> <ul style="list-style-type: none"> Fully Mechanized: 0 - <= 1 business hour Partially Mechanized: 0 - <= 10 business hours Non-Mechanized: 0 - <= 18 business hours Local Interconnection Trunks: 0 - <= 4 business days CLEC Specific CLEC Aggregate Geographic Scope - State <p>Rationale: Removed duplicate of standard interval value that is already included within the Benchmark section of this measure</p>	<p>Report Structure</p> <p>One report with the following four Disaggregation Levels and their associated interval buckets:</p> <ul style="list-style-type: none"> Fully Mechanized: 0 - <= 1 business hour Partially Mechanized: 0 - <= 10 business hours Non-Mechanized: 0 - <= 18 business hours Local Interconnection Trunks: 0 - <= 4 business days CLEC Specific CLEC Aggregate Geographic Scope State 	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments								
Disaggregation		SQM Level of Disaggregation SQM/SEEM Analog/Benchmark <table data-bbox="1069 243 1811 511"> <tr> <td>Fully Mechanized ≤ 1 Business Hour</td> <td>97%</td> </tr> <tr> <td>Partially Mechanized ≤ 10 Business Hours</td> <td>95%</td> </tr> <tr> <td>Non-Mechanized ≤ 18 Business Hours</td> <td>95%</td> </tr> <tr> <td>Local Interconnection Trunks ≤ 2 + Business Days</td> <td>90%</td> </tr> </table>	Fully Mechanized ≤ 1 Business Hour	97%	Partially Mechanized ≤ 10 Business Hours	95%	Non-Mechanized ≤ 18 Business Hours	95%	Local Interconnection Trunks ≤ 2 + Business Days	90%	
Fully Mechanized ≤ 1 Business Hour	97%										
Partially Mechanized ≤ 10 Business Hours	95%										
Non-Mechanized ≤ 18 Business Hours	95%										
Local Interconnection Trunks ≤ 2 + Business Days	90%										
SEEM Measure	<table data-bbox="327 573 739 633"> <tr> <td>SEEM</td> <td>Tier I</td> <td>Tier II</td> </tr> <tr> <td>Yes</td> <td>X</td> <td>X</td> </tr> </table> <p data-bbox="327 727 424 751">Rationale:</p> <p data-bbox="327 781 1024 841">Revises current version of ILM to reflect AT&T's proposal to transition to current remedy plan.</p> <ul data-bbox="370 870 989 1057" style="list-style-type: none"> Eliminate Tier 2 remedies. <ul style="list-style-type: none"> Local markets irreversibly open. 17 months since passage of 96 Telecomm Act. Tier 2 remedy to prevent backsliding no longer needed. 	SEEM	Tier I	Tier II	Yes	X	X				
SEEM	Tier I	Tier II									
Yes	X	X									

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Ordering	
O-9	FOCT	Firm Order Confirmation Timeliness		
Exclusions		<ul style="list-style-type: none"> Service Requests canceled by CLEC prior to a FOC being returned Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only LSRs identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations Test Transactions/Records Scheduled OSS Maintenance <p><u>Comment:</u></p> <ul style="list-style-type: none"> Project exclusion for bulk migration was related to UNE-P to Resale conversion Deadline for UNE-P conversion has passed. <p>Measure for Bulk Migration was implemented in anticipation of high volumes of UNE-P to UNE-Loop conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 9 in February, 52 in March (27 for a single CLEC), 30 in April (all for that same CLEC), and 9 in May.</p>	<ul style="list-style-type: none"> Service Requests canceled by CLEC prior to a FOC being returned Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only LSRs identified as "Projects with the exception of valid "Projects IDs" for Bulk Migrations and M&A Test Transactions/Records Scheduled OSS Maintenance 	<p>Parties Agree except for resolution of Tier-II elimination and LSRs submitted via e-mail and Non-Mechanized categorization that is highlighted.</p> <p>CLECs withdraw M&A transactions request for Exclusions.</p>
Business Rules		<p>When multiple FOCs occur on a single LSR/ASR, the first FOC is used to measure the interval.</p> <p>For Partially Mechanized and Non-Mechanized LSR/ASRs, only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR/ASR until normal closing of the center, if an LSR/ASR is worked using overtime hours. In the case of a partially mechanized LSR/ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the <u>Interconnection AT&T website</u>: (http://www.interconnection.bellsouth.com/centers)</p> <p>Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until</p>	<p><u>Comment:</u> The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?</p>	<p>Parties Agree that AT&T will include the website for hours of operations.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.</p> <p>Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until appropriate service orders are issued by a BellSouth <u>AT&T</u> service representative and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.</p> <p>Non-Mechanized: The elapsed time from receipt of a valid paper LSR not submitted via electronic systems (date and time stamp of FAX or date and time paper LSRs received in LCSC Email) until appropriate service orders are issued by a BellSouth <u>AT&T</u> service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via FAX Server Email.</p> <p>Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).</p> <p>Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time stamp" from the receipt of the original Global Request.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Update to remove reference to URL address • Email is correct method for delivery of manual requests • Project exclusion for bulk migration was related to UNE-P to Resale conversion. • Deadline for UNE-P conversion has passed <p>Measure for Bulk Migration was implemented in anticipation of high volumes of UNE-P to UNE-Loop conversion orders. Current volume is low. Within the past 12 months in Florida, from June 2008 to May 2009, there were no Bulk order requests received from June to August and December 2008. There were 62 orders in October and 154 in November 2008. In 2009, there were only 6 in January, 0 in February, 52 in March (27</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>5/14/09 CLEC's New Proposed Interval Buckets</p>		
Calculation	<p>Firm Order Confirmation Interval = (a - b)</p> <p>a = Date and time of Firm Order Confirmation b = Date and time of service request receipt</p> <p>Percent within Interval = (c ÷ d) X 100</p> <p>c = Service requests confirmed in reported interval d = Total service requests confirmed in the report period</p> <p>Rationale:</p> <ul style="list-style-type: none"> • The original measure and mathematical operation (percentage multiplication) has been corrected to a "X" rather than "÷" or "x". 		
Report Structure	<p>One report with the following four Disaggregation Levels and their associated interval buckets:</p> <p>Fully Mechanized: 0 - <= 3 business hours</p> <p>Partially Mechanized: 0 - <= 10 business hours</p> <p>Non-mechanized: 0 - <= 24 business hours</p> <p>Local Interconnection Trunks: 0 - <= 5 business days</p> <p>CLEC Specific CLEC Aggregate Geographic Scope _State</p> <p>Rationale:</p> <p>Removed duplicate of standard interval value that is already included within the Benchmark section of this measure</p>	<p>Report Structure</p> <p><u>One report with the following four Disaggregation Levels and their associated interval buckets:</u></p> <ul style="list-style-type: none"> • Fully Mechanized: 0 - <= 3 business hours • Partially Mechanized: 0 - <= 10 business hours • Non-mechanized: 0 - <= 24 business hours • Local Interconnection Trunks: 0 - <= 5 business days • CLEC Specific • CLEC Aggregate • Geographic Scope State 	
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <p>Resale - Residence (Non-Design) Fully Mechanized.....95% <= 3 business hours</p> <p>Resale - Business (Non-Design) Partially Mechanized.....95% <=</p>	<p>SQM Disaggregation - Analog/Benchmark</p> <p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <ul style="list-style-type: none"> • Resale -- Residence (Non-Design) Fully Mechanized: 95% 	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>10 business hours</p> <p>Resale – Design (Special) Non-Mechanized, 95% <= 24 business hours</p> <p>– LNP Standalone</p> <p>– UNE Analog Loop</p> <p>– UNE Analog Loop with LNP</p> <p>– UNE Digital Loop >= DS1</p> <p>Local Interconnection Trunks, 95% <= 5 business days</p> <p>Product being ordered is insignificant.</p> <p>Strip by reporting by aggregating products to mechanization level.</p> <p>Level of disaggregation consistent with O-S. Reject file val, metric</p>	<p><= 3 business hours</p> <ul style="list-style-type: none"> • Resale – Business (Non-Design) Partially Mechanized: 95% <= 10 business hours • Resale – Design (Special) Non-Mechanized, 95% <= 24 business hours • LNP (Standalone) • UNE Analog Loop • UNE Analog Loop with LNP • UNE Digital Loop >= DS1 • UNE ISDN UDC IDSL • UNE Other • UNE Line Splitting • UNE EELs • UNE xDSL (ADSL, HDSL, UCL) • Local Interconnection Trunks 95% <= 5 business days 	
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>Yes X X</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. • Eliminate Tier 2 remedies. • Local markets irreversibly open. • Thirteen years since passage of '96 Telecom Act. • Tier 2 incentive to prevent backsliding no longer needed. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	
0-11	FOCC	Firm Order Confirmation and Reject Response Completeness	Ordering
Definition		<p>This measurement provides the percent of Local Service Requests (LSRs) Access Service Requests (ASRs) received during the reporting period that are responded to with either a reject or firm order confirmation.</p> <p>Rationale</p> <ul style="list-style-type: none"> • Minimize error to simplify user • AT&T provides a high level of performance - from 05/05/07 to 05/09/09, PM = 99.91%, PM = 99.65%, NM = 97.16% • Measures equivalent metrics of Firm Order Confirmation or Reject Notifications measured by O.S. and O.P. teams. • OSS-2, OSS Interface Availability captures response issues due to system functionality and availability. 	Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions		<ul style="list-style-type: none"> • Service requests canceled by the CLEC prior to FOC or Reject being sent • Fatal Rejects • LSRs identified as "Projects" with the exception of valid "Project IDs" for Bulk Migrations • Test Transactions/Records 	<p>Exclusions</p> <ul style="list-style-type: none"> • Service requests canceled by the CLEC prior to FOC or Reject being sent • Fatal Rejects • LSRs identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations and <u>M&A</u> • Test Transactions/Records

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>Fully Mechanized: The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways).</p> <p>Partially Mechanized: The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways), which fallout for manual handling by the LCSC personnel.</p> <p>Non Mechanized: The number of FOCs or Rejects sent to the CLECs via FAX server in response to manually submitted LSRs/ASRs (date and time stamp in FAX Server).</p> <p>Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).</p> <p>Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via Global Requests. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure.</p>	<p>Business Rules</p> <p>Fully Mechanized: The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways).</p> <p>The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?</p> <p>Partially Mechanized: The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways), which fallout for manual handling by the LCSC personnel.</p> <p>Non Mechanized: The number of FOCs or Rejects sent to the CLECs via FAX server in response to manually submitted LSRs/ASRs (date and time stamp in FAX Server).</p> <p>Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).</p> <p>Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via Global Requests. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure.</p>	
Calculation	<p>Firm Order Confirmation / Reject Response Completeness = (a - b) X 100</p> <ul style="list-style-type: none"> • a = Total number of service requests for which a Firm Order Confirmation or Reject is sent • b = Total number of service requests received in the report period 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Report Structure	<ul style="list-style-type: none"> - One report with the following four Disaggregation Levels: <ul style="list-style-type: none"> - Fully Mechanized - Partially Mechanized - Non-Mechanized - Local Interconnection Trunks - CLEC Specific - CLEC Aggregate - Geographic Scope - State 	<p>Report Structure</p> <ul style="list-style-type: none"> • One report with the following four Disaggregation Levels: <ul style="list-style-type: none"> Fully Mechanized -Partially Mechanized Non-Mechanized Local Interconnection Trunks • CLEC Specific • CLEC Aggregate • Geographic Scope State 	
SQM Disaggregation - Analog Benchmark	<p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <p>Fully Mechanized _____ 98% Returned</p> <p>Partially Mechanized _____ 95% Returned</p> <p>Non-Mechanized _____ 95% Returned</p> <p>Local Interconnection Trunks _____ 95% Returned</p>	<p>gregation - Analog/Benchmark</p> <p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <p>Fully Mechanized 98% Returned</p> <p>Partially Mechanized 95% Returned</p> <p>Non-Mechanized _____ 95% Returned</p> <p>Local Interconnection Trunks 95% Returned</p>	
SEEM Measure	<p>SEEM _____ Tier I _____ Tier II</p> <p>Yes _____ X _____ X</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Ordering	
O-12	OAAT	Average Answer Time - Ordering Centers		
Business Rules		<p>The duration starts when a CLEC representative or customer AT&T customer makes a choice on the ordering center's menu and is put in queue for the next service representative and stops when a BellSouth AT&T service representative answers the call. Abandoned calls are not included in the volume of calls handled but are included in total seconds.</p> <p>Rationale: AT&T is eliminating the reference to the business unit comparison as it is no longer applicable with the establishment of a number 10. In this measure.</p>		Parties Agree to AT&T's proposed changes except for resolution of Tier-II elimination that is highlighted.
Report Structure		<ul style="list-style-type: none"> • CLEC Aggregate <ul style="list-style-type: none"> ▪ Business Service Center ▪ Geographic Scope <ul style="list-style-type: none"> ▪ Region <p>Rationale: Dissimilar call processing activities occur within the Wholesale and retail centers making a comparison unlikely.</p>	<p>Report Structure</p> <ul style="list-style-type: none"> • CLEC Aggregate • BellSouth Aggregate <ul style="list-style-type: none"> ▪ Business Service Center ▪ Consumer Service Center • Geographic Scope <ul style="list-style-type: none"> ▪ Region 	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation - Analog/Benchmark	<p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <p><u>Parity with Retail (Business Service Center) Average Answer Time = 30 seconds</u></p> <p>Rationale:</p> <p>The proposed plan will change the processing of calls at the local carrier's service center for LSC.</p> <p>To use the retail center, the LSC handles calls from the retail center, as required by the plan and for calls from CLEC's that do not have a tiered service plan.</p> <p>Calls on more than one call up to \$4.00 are a problem for the carrier. The carrier may be able to handle the calls if the carrier reports the problem.</p> <p>Early service is sufficient time to answer the call.</p>	<p>SQM Disaggregation - Analog Benchmark</p> <p>SQM Level of Disaggregation</p> <p>SQM SEEM Analog Benchmark</p> <p>CLEC Local Carrier Service Center</p> <p>Parity with Retail (Business Service Center & Consumer Service center))</p>	
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>Yes X</p> <p>Rationale:</p> <ul style="list-style-type: none"> Removal of references to SEEM to reflect AT&T's proposed transition to commercial remedy plan. Eliminate Tier 2 remedies. <ul style="list-style-type: none"> Eliminate Tier 2 remedies. Thirteen years since passage of '96 Telecomm Act. Tier 2 incentive to prevent backsliding no longer needed. 	<p>SEEM Measure</p> <p>SEEM Tier I Tier II</p> <p>Yes <u>X</u> X</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
P-1	HOI	Held Order Interval		
SQM Disaggregation Analog/Benchmark		<p>SQM Level of Disaggregation SQM Analog/Benchmark</p> <p>Resale Residence (Non-Design) Retail Residence (Non-Design)</p> <p>Resale Business (Non-Design) Retail Business (Non-Design)</p> <p>Resale Design Retail Design</p> <p>UNE Analog Loop (Design) Retail Residence, Business, and Design (Dispatch) (Excluding Digital Loops)</p> <p>UNE Analog Loop (Non-Design) Retail Residence and Business - POTS (Excluding Switch Based Orders)</p> <p>UNE Digital Loop >= DS1 Retail Digital Loop >= DS1</p> <p>UNE EELs Retail DS1 DS3</p> <p>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail</p> <p>UNE ISDN/UDC/IDSL Retail ISDN - BRI</p> <p>UNE Line Splitting ADSL Provided to Retail</p> <p>UNE Other Design Diagnostic</p> <p>UNE Other Non-Design Diagnostic</p> <p>Local Interconnection Trunks Direct comparison Parity with Retail Trunks</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
		<p>Railway:</p> <p>Combine DSL take some measures to single disaggregation</p> <p>Performance standard for both existing disaggregations are identical (retail analog is ADSL service)</p> <p>AT&T has reported UCL transactions for the UNE Line Splitting submission form less the 1st 12-month period. Combining this disaggregation with UNE ADSL will have no impact on results</p> <p>Remove two Diagnostic disaggregation, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Remove all references to SEEM to reflect AT&T's proposed change to the number of orders due to copper not being available.</p> <p>Remove all references to SEEM to reflect AT&T's proposed change to the number of orders due to copper not being available.</p>		
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>No</p> <p>Remove all references to SEEM to reflect AT&T's proposed change to the number of orders due to copper not being available.</p>	<p>Compsouth requests a diagnostic measure that indicates the number of orders PF due to copper not being available. This could be accomplished as a subset of this measure or new measure</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-2A	PJ48	Percentage of Orders Given Jeopardy Notices >= 48 Hours		
Exclusions			<p>Exclusions</p> <ul style="list-style-type: none"> • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or T). • Disconnect Orders • Orders issued with a due date of less than 48 hours • Orders jeopardized on the due date. This exclusion only applies when the technician on premises has attempted to provide service but must refer to Engineer or Cable Repair for facility jeopardy. • Listing Orders 	<p>Parties Agree.</p> <p>CLECs withdrew request to strike Exclusion and to make this a Tier-I remedied metric.</p>
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation Analog/Benchmark	SQM/SEEM		
	Resale Residence (Non-Design) hours	95% > = 48		
	Resale Business (Non-Design) hours	95% > = 48		
	Resale Design hours	95% > = 48		
	UNE Analog Loop (Design) hours	95% > = 48		
	UNE Analog Loop (Non-Design) hours	95% > = 48		
	UNE Digital Loop >= DS1 hours	95% > = 48		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>UNE EELs 95% ≥ 48 hours</p> <p>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) 95% ≥ 48 hours</p> <p>UNE ISDN/UDC/DSL 95% ≥ 48 hours</p> <p>UNE Line Splitting 95% ≥ 48 hours</p> <p>UNE Other Design 95% ≥ 48 hours</p> <p>UNE Other Non-Design 95% ≥ 48 hours</p> <p>Local Interconnection Trunks 95% ≥ 48 hours</p> <p>Rationale:</p> <p>Combine DSL/Telx services into a single disaggregation.</p> <p>Performance standard for both existing disaggregations are identical that of local ISL/ADSL services.</p> <p>AT&T has not reported CLIC transactions for the UNE Line Splitting submeasure for at least the last 12-month period, 05/08 through 05/09. Combining this disaggregation with UNE xDSL will have no impact on results.</p> <p>Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will incur no capital or credits and will remove a number of submeasures being processed. AT&T has reported less than 30 CLIC transactions for these submeasures combined for at least the last 12 months.</p>		
SEEM Measure	<p>SEEM.....Tier I.....Tier II</p> <p>No</p> <p>Rationale:</p> <p>Remove all references to SEEM to reflect AT&T's proposal to transition to commercial ready plan.</p>	<p>SEEM Measure</p> <p>SEEM Tier I Tier II</p> <p>No-Yes.....X.....</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-2B	PJ	Percentage of Orders Given Jeopardy Notices		
Exclusions			<p>Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or T).</p> <p>Disconnect Orders</p> <p>Listing Orders</p> <p>Orders jeopardized on the due date</p> <p>Orders issued with a due date of less than or equal to 48 hours</p>	<p>Parties Agree to AT&T's proposed changes and to CLECs' proposal for removal of exclusion in metric.</p> <p>AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM Disaggregation Analog/Benchmark	<p align="center">SQM Level of Disaggregation Analog/Benchmark</p> <p>Resale Residence (Non-Design) (Non-Design)</p> <p>Resale Business (Non-Design) (Non-Design)</p> <p>Resale Design</p> <p>UNE Analog Loop (Design) Business and Design (Dispatch) (Excluding</p>	<p align="center">SQM/SEEM</p> <p>Retail Residence</p> <p>Retail Business</p> <p>Retail Design</p> <p>Retail Residence,</p>	
--	---	--	--

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

	<p>Digital Loops)</p> <p>UNE Analog Loop (Non-Design) and Business - POTS (Excluding Switch Based Orders) Retail Residence</p> <p>UNE Digital Loop > - DS1 >= DS1 Retail Digital Loop</p> <p>UNE EELs Retail DS1:DS3</p> <p>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail</p> <p>UNE ISDN/UDC/IDSL Retail ISDN - BRI</p> <p>UNE Line Splitting Retail ADSL Provided to Retail</p> <p>UNE Other Design Diagnostic</p> <p>UNE Other Non-Design Diagnostic</p> <p>Local Interconnection Trunks comparison Parity with Retail Trunks <u>Direct</u></p> <p>Rationale:</p> <p>Combine DS1-like services into a single disaggregation.</p> <p>Performance standard for both existing disaggregations are identical (retail analog is ADSL services).</p> <p>AT&T has not reported CLEC misses for the UNE Line Splitting submeasure for at least the last 12-month period (June 08 through May 09). Combining this disaggregation with UNE xDSL will have no impact on results.</p> <p>Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. AT&T has reported less than 30 CLEC complaint notices for these submeasures combined for at least the last 12 months.</p> <p>Administrative change for clarity.</p>		
--	--	--	--

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
P-3	MIA	Percent Missed Installation Appointments		
Exclusions			<p>Exclusions</p> <p>Orders canceled prior to the due date including orders that are to be provisioned on the same day they are placed. (Zero Due Date Orders)</p> <ul style="list-style-type: none"> • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Disconnect Orders • Listing Orders 	<p>Parties Agree to AT&T's proposed changes except for resolution of Tier-II elimination that is highlighted.</p> <p>AT&T agrees to modify Exclusion to read: "Orders canceled on or prior to the due date."</p>
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation Analog/Benchmark	SQM/SEEM		<p>AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".</p>
	Resale Residence (Non-Design) Residence (Non-Design)	Retail		
	Resale Business (Non-Design) (Non-Design)	Retail Business		
	Resale Design	Retail Design		
	LNP (Standalone) Residence and Business (POTS)	Retail		
	UNE Analog Loop (Design) Residence; Business and Design (Dispatch) (Excluding Digital Loops)	Retail		
	UNE Analog Loop (Non-Design) Residence and Business - POTS (Excluding Switch	Retail		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Based Orders)</p> <p>UNE Analog Loop with LNP-Design Retail Residence; Business and Design (Dispatch) (Excluding Digital Loops)</p> <p>UNE Analog Loop with LNP-Non-Design Retail Residence and Business – POTS (Excluding Switch Based Orders)</p> <p>UNE Digital Loop >> DS1 Retail Digital Loop >> DS1</p> <p>UNE EELs Retail DS1/DS3</p> <p>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail</p> <p>UNE ISDN, UDC/DSL Retail ISDN – BRI</p> <p>UNE Line Splitting ADSL Provided to Retail</p> <p>UNE Other Design Diagnostic</p> <p>UNE Other Non-Design Diagnostic</p> <p>Local Interconnection Trunks Direct <u>comparison Parity with Retail Trunks</u></p> <p>Rationale:</p> <p>Combine DSL like services into a single disaggregation.</p> <p>Performance standard for both existing disaggregations are taken Equal (equal analog vs ADSL services).</p> <p>AT&T has reported less than 5 CLEC missed appointments for the UNE Line Splitting submeasures for at least the last 12-month period (January through May 09). Combining this disaggregation with UNE xDSL will have only a minimal impact on results.</p> <p>Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed. AT&T has reported only 5 CLEC misses for these submeasures combined for at least the last 12 months.</p> <p>Administrative change for clarity.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	<p>SEEM _____ Tier I _____ Tier II _____</p> <p>_____ Yes _____ X _____ X</p> <p>at market</p> <ul style="list-style-type: none"> • Review of transition from SEEM to standard CLEC's proposed transition to a market of remedial plan • Eliminate Tier II remedies • Local market irreversibly open • Update the resource package of 9th Edition cost • Tier II incentive to prevent backsliding of local market 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
P-4	OCI	Order Completion Interval (OCI)		
Business Rules		<p>The completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from when BellSouth <u>AT&T</u> issues a FOC/SOCS date time-stamp indicating receipt of an order (application date) from the CLEC to BellSouth's <u>AT&T's</u> order completion date. Orders worked on zero due dates are calculated with a .33-day interval (8 hours). Orders can be either dispatch or non-dispatch.</p> <p>Only valid business days will be included in the calculation of this interval. Valid business days may be found at the BellSouth's <u>AT&T</u> website: (http://www.interconnection.bellsouth.com/#localorderinghandbook-intervalguide).</p> <p>Reference: update to provide reference to website rather than the URL. Reference: we may change in future platform rearrangements.</p>		<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p> <p>AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".</p>
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation Analog/Benchmark	SQM/SEEM		
	Resale Residence (Non-Design) Residence (Non-Design)	Retail		
	Resale Business (Non-Design) Business (Non-Design)	Retail		
	Resale Design	Retail Design		
	LNP (Standalone) Residence and Business (POTS)	Retail		
	UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail		
	UNE Analog Loop (Non-Design) Residence and Business (Dispatch)	Retail		
	UNE Analog Loop with LNP-Design	Retail		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Residence, Business and Design (Dispatch) (Excluding Digital Loops)</p> <p>UNE Analog Loop with LNP-Non-Design Residence and Business (Dispatch) Retail</p> <p>UNE Digital Loop >= DS1 Loop >= DS1(Dispatch) Retail Digital</p> <p>UNE EELs Retail DS1-DS3(Dispatch)</p> <p>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting)</p> <p><= 5 Business Days</p> <p><= 11 Business Days</p> <p>UNE ISDN/UDC/ISDL Retail ISDN - BRI</p> <p>UNE Line Splitting without Conditioning ADSL Provided to Retail</p> <p>with Conditioning <= 11 Business Days</p> <p>UNE Other Design Diagnostic</p> <p>UNE Other Non-Design Diagnostic</p> <p>Local Interconnection Trunks <u>Direct</u> <u>comparison Parity with Retail Trunks</u></p> <p>Rationale:</p> <p>Combining DSL-like services into a single disaggregation.</p> <p>The benchmark performance standard is applicable to all DSL-like services.</p> <p>Of the four different (i.e. No Line Splitting) disaggregations, AT&T has not reported CLIC miss for at least the last 12-month period. Combining this disaggregation with UNE xDSL will have no impact on results.</p> <p>Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. With no applicable retail analogs for these submissions for at least the last 12 months, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submissions being processed.</p> <p>Administrative change for clarity.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	<p>SEEM Tier I Tier II Yes X X</p> <p>00000000</p> <ul style="list-style-type: none"> • Rationale: all metrics to SEEM correct with some issues transitioning to common. Primary goal • Eliminate Tier 1 remedies <ul style="list-style-type: none"> o Measures same process of providing service to end-user that is captured by other metrics o Critical customer service affecting metrics (Ex: Percent Missed Calls from Appointment, ISMVA) o Will continue to provide performance measurement reports • Eliminate Tier 2 remedies <ul style="list-style-type: none"> o Local market incentives to open o Fifteen years since passage of the Telecomm Act o Tier 2 incentive to prevent mail stilling no longer needed. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure
P-5	CNI	Average Completion Notice Interval

SQM Section	AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale	
Business Rules		<p>Business Rules</p> <p>The interval begins with the completion date and time and the interval ends with release of the notice of completion status to the CLEC. The field technician notifies the CLEC the work was complete and then he/she enters the completion time stamp information in his/her computer. This information switches through to the SOCS systems to the Work Management Center (WMC), either completing or rejecting the order. If the completion is rejected, it is manually corrected and then completed by the WMC. The notice is returned on each individual order.</p> <p>The end time for mechanized orders is the time stamp when the notice was delivered to the CLEC interface. For non-mechanized orders the end time will be date and timestamp of order update from the C-SOTS system. For the retail analog, the start time begins when the technician completes the order and ends when the order status is changed to complete in SOCS.</p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p> <p>AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".</p>
Report Structure		<p>Report Structure</p> <ul style="list-style-type: none"> • CLEC Specific • CLEC Aggregate • BellSouth Aggregate • Mechanized Orders • Reporting intervals in hours • Non-Mechanized Orders • Geographic Scope <p style="text-align: center;">State</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation Analog/Benchmark</p> <ul style="list-style-type: none"> • Resale Residence (Non-Design) (Non-Design) Retail Residence • Resale Business (Non-Design) (Non-Design) Retail Business • Resale Design Retail Design • LNP (Standalone) and Business (POTS) Retail Residence • UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops) Retail • UNE Analog Loop (Non-Design) and Business – POTS (Excluding Switch Based Orders) Retail Residence • UNE Analog Loop with LNP - Design Residence, Business and Design (Dispatch) (Excluding Digital Loops) Retail • UNE Analog Loop with LNP- Non-Design and Business – POTS (Excluding Switch Based Orders) Retail Residence • UNE Digital Loop >= DS1 Loop >= DS1 Retail Digital • UNE EELs Retail DS1/DS3 • UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) Provided to Retail ADSL • UNE ISDN/UDC/DSL BRI Retail ISDN - BRI • UNE Line Splitting to Retail ADSL Provided to Retail • UNE Other Design Diagnostic • UNE Other Non-Design Diagnostic • Local Interconnection Trunks <u>Direct</u> <u>comparison Parity with Retail Trunks</u> <p>Rationale: Combine DSL like services into a single disaggregation. Performance standard for both existing disaggregations are identical (retail)</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>including ADSL service.</p> <p>The final rule will be subject to a 30-day comment period. The Commission will be conducting a public hearing on the rule. The Commission will be conducting a public hearing on the rule.</p> <p>The Commission's proposed aggregation of Tier I and Tier II service will be subject to a 30-day comment period. The Commission will be conducting a public hearing on the rule. The Commission will be conducting a public hearing on the rule.</p> <p>Additional information is available at:</p>		
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>No.....</p> <p>Rationale:</p> <p>Remove the SEEM measure from the AT&T's proposal by provision to remove it from the plan.</p>	<p>SEEM Measure</p> <p>SEEM Tier I Tier II</p> <p>No <u>X</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
P-7	CCI	Coordinated Customer Conversions- Hot Cut Duration		
SEEM Measure		<p>SEEM Tier I Tier II</p> <p>Yes.....X.....X</p> <p>Rationale:</p> <ul style="list-style-type: none"> • ... • ... • ... <p>Further info, see page 12 of 95 Telecom Act.</p> <p>...to prevent ...</p>		Parties Agree except for resolution of Tier-II elimination that is highlighted.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-7A	CCT	Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval		
SEEM Measure		<p>SEEM Tier I Tier II</p> <p>Yes.....X.....X</p> <p>Rationale:</p> <ul style="list-style-type: none"> Remove all references to SEEM to reflect AT&T's promise to finish all customer migration plan Eliminate Tier 2 remedies <ol style="list-style-type: none"> Local number reversibly open Interstate as directed by 96 Telecom Act Let 100 number porting prevent backsliding no longer needed. 		Parties Agree except for resolution of Tier-II elimination that is highlighted.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-7B	CCRT	Coordinated Customer Conversions—Average Recovery Time		
Definition		<p>This report measures outages associated with Coordinated Customer Conversions prior to service order completion, which can be isolated to BellSouth's side of the network.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Improve customer service • Increase service level and level of performance • During the fiscal year ending June 30 through May 31, CLEC missed or unrecorded outages that were associated with coordinated conversions. 		Parties Agree to eliminate metric.
Exclusions		<ul style="list-style-type: none"> • Conversions where service outages are due to CLEC caused reasons • Conversions where service outages are due to end-user caused reasons • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Listing Orders 		
Business Rules		<p>Measures the outage duration time related to Coordinated Customer Conversions from the initial trouble notification until the service has been restored and the CLEC has been notified. The interval is calculated on the total outage time for the circuits divided by the total number of outages restored during the report period to give the average outage duration. This measure also displays the overall percentage of orders which did not experience a trouble during a coordinated conversion.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Recovery Time (a - b)</p> <ul style="list-style-type: none"> • a = Date and time the initial trouble is cleared and the CLEC is notified • b = Date and time the initial trouble is opened with BellSouth <p>Average Recovery Time (c - d)</p> <ul style="list-style-type: none"> • c = Sum of all the Recovery Times • d = Number of troubles referred to BellSouth <p>Percentage of Items with No Troubles = (e - f) X 100</p> <ul style="list-style-type: none"> • e = Total items in the reporting period that did not have a trouble during a coordinated conversion • f = Total items for the reporting period 	<p>Calculation</p> <p>Recovery Time = (a - b)</p> <ul style="list-style-type: none"> • a = Date and time the initial trouble is cleared and the CLEC is notified <u>by call or email</u> • b = Date and time the initial trouble is opened with BellSouth 	
Report Structure	<ul style="list-style-type: none"> • CLEC Specific • CLEC Aggregate • Geographic Scope State 		
SQM Disaggregation Analog/Benchmark	<p>----- SQM Level of Disaggregation ----- SQM/SEEM</p> <p>----- Analog/Benchmark -----</p> <p>----- Coordinated Customer Conversions (Loops) -----</p> <p>----- <= 5 Hours -----</p>		
SEEM Measure	<p>SEEM ----- Tier I ----- Tier II</p> <p>No -----</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	<h1>Provisioning</h1>	
17C	CPI	Hot Cut Conversions—Percent Provisioning Troubles Received within 5 Days of a Completed Service Order		
Definition		<p>This report measures the percentage of provisioning troubles received within 5 days of a completed service order associated with a Coordinated and Non-Coordinated Customer Conversion and ensures the quality and accuracy of Hot Cut Conversion activities.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Eliminate metric to simplify plan • Measures same process captured by P-9 (PPI), Percent Provisioning Troubles within "X" Days of Service Order Completion • AT&T consistently provides a high level of performance. <ul style="list-style-type: none"> o Performance for past 12 months for dispatch and non-dispatch (June 2008 to May 2009) averaged 1.45% against a benchmark of 1.2%. 	Parties Agree to eliminate metric.	
Exclusions		<ul style="list-style-type: none"> —CLEC Canceled Orders —Troubles caused by Customer Provided Equipment (CPE) or CLEC Equipment —Listing Orders —Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or F) —Troubles outside of BellSouth's control <ul style="list-style-type: none"> —A cut or damaged cable, caused by other than BellSouth employees or contractors —Troubles caused by vandalism, theft, motor accidents or petroleum chemical accidents caused by parties other than BellSouth Disconnect Orders 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	The first trouble report received on a circuit ID within 5 days following a service order completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate.		
Calculation	<p>Percentage of Provisioning Troubles within 5 Days of Service Order Completion = $(a/b) \times 100$</p> <ul style="list-style-type: none"> • a = The sum of all Hot Cut Circuits with a trouble within 5 days following service order(s) completion • b = The total number of Hot Cut Circuits completed in the previous reporting period 		
Report Structure	<ul style="list-style-type: none"> • CLEC Specific • CLEC Aggregate • Dispatch Non-Dispatch • Geographic Scope State 		
SQM Disaggregation Analog/Benchmark	<p>— SQM Level of Disaggregation</p> <p>SQM/SEEM Analog/Benchmark</p> <ul style="list-style-type: none"> • UNE Loops 		
SEEM Measure	<p>SEEM ——— Tier I ——— Tier II</p> <p>No</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-7D	NCDD	Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date		
SEEM Measure		<p>SEEM Tier I Tier II</p> <p>Yes: X X</p> <p>Rationale:</p> <ul style="list-style-type: none"> Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. Eliminate Tier 2 remedies. <ul style="list-style-type: none"> Let a market irreversibly open. Thirteen years since passage of 96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed. 		Parties Agree except for resolution of Tier-II elimination that is highlighted.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
P-9	PPT	Percent Provisioning Troubles within "X" Days of Service Order Completion		
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation Analog/Benchmark	SQM/SEEM		<p>Parties Agree except for resolution of Tier-II elimination that is highlighted.</p> <p>AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".</p>
		Retail Residence (Non-Design)	Retail Residence	
		Retail Business (Non-Design)	Retail Business	
		Retail Design	Retail Design	
		Retail Residence and Business (POTS)	Retail Residence	
		Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail	
		Retail Residence and Business - POTS (Excluding Switch Based Orders)	Retail Residence	
		Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)	Retail	
		Retail Residence and Business - POTS (Excluding Switch Based Orders)	Retail Residence	
		Retail Digital Loop >= DS1	Retail Digital	
		Retail DS1/DS3	Retail DS1/DS3	
		Retail ISDN-BRI	Retail ISDN-BRI	
		ADSL Provided to Retail	ADSL Provided to Retail	
Diagnostic	Diagnostic			
Diagnostic	Diagnostic			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Local Interconnection Trunks <u>Direct</u> <u>comparison</u> Parity with Retail Trunks</p> <p>Rationale:</p> <ul style="list-style-type: none"> - CLEC's DSL services are being streamlined. - The CLEC's will limit both existing DSL registrations and financial and services to ADSL service. - CLEC's DSL registrations will have minimal impact on results. - Removal of DSL registrations, UNE Other Design and UNE Other Non-Design. Will not applicable for analysis for these offerings as the CLEC's have indicated there is no substantive information being provided. Discontinuing the production of these registrations will have no impact on results and will reduce the number of submissions being processed. - Administrative change for parity. 		
SEEM Measure	<p>SEEM Tier I Tier II Yes _____ X _____ X</p> <p>Rationale:</p> <ul style="list-style-type: none"> - Revising references to SEEM to reflect AT&T's proposal to administratively remove the measure. - Eliminate Tier 2 remedies. - Local market irreversibly open. - Change of rules since passage of 95 Telecom Act. - Tier 2 incentive to prevent backsliding no longer needed. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-11	SOA	Service Order Accuracy		
Definition		<p>This report measures the accuracy and completeness of CLEC requests for service by comparing the CLEC Local Service Request (LSR) to the completed service order after provisioning has been completed. Only electronically submitted LSRs that require manual handling (Partially Mechanized) by an BellSouth AT&T service representative in the ECSC LSC are measured.</p> <p>Rationale:</p> <ul style="list-style-type: none"> Currently the AT&T Pre-Ordering and Ordering Center is a mixed Team Service Center (LSC). 	<p>Exclusions</p> <ul style="list-style-type: none"> • Canceled Service Orders • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Disconnect Orders • CLEC LSRs submitted electronically that are not manually handled by BellSouth (Flow-Through) • "Projects" with no LSR (<u>excluding M&A projects</u>) 	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
Exclusions		<ul style="list-style-type: none"> • Canceled Service Orders • Order activities of BellSouth AT&T or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Disconnect Orders • CLEC LSRs submitted electronically that are not manually handled by BellSouth AT&T (Flow-Through) • "Projects" with no LSR • <u>LNP Trigger Orders</u> <p>Rationale:</p> <ul style="list-style-type: none"> • LNP Trigger Orders are internal administrative orders. • Trigger Orders alert downstream systems that a telephone number is getting ready to be ported out and do not prevent the port activity from taking place. 		
Business Rules		The CLEC requested services on the LSR are mechanically compared to the completed service order using the CLEC affecting service attributes		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>shown below.</p> <p>Selected CLEC Affecting Service Attributes</p> <p>The BellSouth <u>AT&T</u> Local Service Request (LSR) fields identified below will be used, as applicable, for this Service Order Accuracy review process.</p> <p>A service affecting comparison of the fields listed below will determine the accuracy of the provisioning process. For any <u>Each</u> of the <u>service affecting</u> fields listed below are populated on the LSR, <u>if the entries and do not match the corresponding field on the Service Order (s), and are service affecting, the order field will be scored as a miss.</u></p> <p>BellSouth <u>AT&T</u> will maintain a list of <u>LCSC LSC/System</u> workarounds which will not be considered service affecting. This list will be identified in a document posted on the <u>Interconnection AT&T</u> website. <u>CLECs may discuss any of the posted LCSC System workarounds during the regular PMAP notification calls.</u></p> <p><u>For Listing Orders:</u></p> <ul style="list-style-type: none"> Company Code PON Billed Telephone Number Telephone Number Ported Telephone Number Circuit ID PIC LPIC Directory Listing <ul style="list-style-type: none"> Directory Delivery Address Listing Activity Alphanumeric Listing Identifier Code Record Type Listing Type Listed Telephone Number Listed Name, Last Name Listed Name, First Name Address Indicator Listed Address House Number Listed Address House Number Suffix Listed Address Street Directional Listed Address Street Name Listed Address Thoroughfare Listed Address Street Suffix Listed Address Locality Yellow Pages Heading 	<p>* Feature Detail will only be checked for the following USOCs: GCE, GCJ, CREX4, GCJRC, GCZ, DRS, VMSAX, S98VM, S98AF, SMBBX, MBBRX [<u>USOC list incomplete? Could reference to USOC manual be used?</u>]. USOCs and FIDs for Feature Detail will be posted on the Interconnection Website. Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this Website.</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Rationale:</p> <ul style="list-style-type: none"> • The current system does not allow an order to be placed for a service that is not currently provisioned on the phone number. • We are adding a new field for provisioning orders which will allow for provisioning orders for provisioning orders, specifically for provisioning orders for provisioning orders by order type. 		
	<p><u>For Provisioning Orders:</u></p> <p><u>Company Code</u> <u>PON</u> <u>Billed Telephone Number</u> <u>Telephone Number</u> <u>Ported Telephone Number</u> <u>Circuit ID</u> <u>PIC</u> <u>LPIC</u> <u>Directory Listing</u> <u>Directory Delivery Address</u> <u>Listing Activity</u> <u>Record Type</u> <u>Listing Type</u> <u>Listed Telephone Number</u> <u>Listed Name Last Name</u> <u>Listed Name First Name</u> <u>Address Indicator</u> <u>Listed Address House Number</u> <u>Listed Address House Number Suffix</u> <u>Listed Address Street Directional</u> <u>Listed Address Street Name</u> <u>Listed Address Thoroughfare</u> <u>Listed Address Street Suffix</u> <u>Listed Address Locality</u> <u>Yellow Pages Heading</u></p> <p>Features <u>Feature Activity</u> <u>Feature Codes</u> <u>Feature Detail*</u></p> <p>Hunting <u>Hunt Group Activity</u> <u>Hunt Group Identifier</u></p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	Telephone Number Identifier Hunt Type Code Hunt Line Activity Hunting Sequence Number Type Hunting Telephone Number		
	<u>E911 Listing Service Address Information</u> Service Address House Number Service Address House Number Suffix Service Address Street Directional Service Address Street Name Service Address Thoroughfare Service Address Street Suffix Service Address Descriptive Location EATN ATN APOT CFA NC NCI * Feature Detail will only be checked for the following USOCs: GCE, GCJ, CREX4, GCJRC, GCZ, DRS, VMSAX, S98VM, S98AF, SMBBX, MBBRX. USOCs and FIDs for Feature Detail will be posted on the <u>Interconnection AT&T Website</u> . Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this <u>Website</u> .		
Calculation	<p>Percent Service Order Accuracy = (a / b) X 100</p> <p>a = <u>Number of service affecting fields with no errors on completed Orders completed without error</u></p> <p>b = <u>Number of service affecting fields on completed associated service Orders completed within reporting period</u></p> <p>Rationale:</p> <p>Change calculation to provide a truer picture of service order accuracy by calculating the percentage of accuracy of all populated service affecting fields.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation SQM-SEEM Analog Benchmark</p> <p>95% Accurate 95% Accurate</p> <p>Rationale:</p> <p>Change of disaggregation on Resale and LUM to more accurately reflect disaggregation of accurate service orders.</p>		
SEEM Measure	<p>SEEM — Tier I — Tier II</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Rationale:</p> <p>Eliminate tiered services to SEEM to reflect AT&T's proposal to eliminate tiered and 1st remedy plan.</p> <p>Eliminate Tier 2 remedies.</p> <p>Local market irreversibly open.</p> <p>Thirteen years since passage of 96 Telecom Act.</p> <p>Tier 2 incentive to prevent backsliding no longer needed.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure
P-13B	LOOS	LNP-Percent Out of Service < 60 Minutes

Provisioning

SEEM Measure	<p>SEEM _____ Tier I _____ Tier II Yes _____ X _____ X</p> <p>Remarks:</p> <ul style="list-style-type: none"> Remove all references to Simple and Complex AT&T's proposal to transition to a universal simple port Remove Tier II remedial <ul style="list-style-type: none"> Low number of events by event Initial port free service to 90 days after Act Tier II remedial agreement not needed by no longer needed. 	<p><u>With new simple port interval will this metric need to be separated into simple and non-simple with different timers? This question should be applied to all the LNP metrics once LNPA recommendation is available.</u></p>	<p>Parties Agree except for resolution of Tier-II elimination that is highlighted.</p> <p>Agreement is metric will remain "as is" and be subject to Tier I remedies. AT&T agrees to provide a new diagnostic disaggregation by simple and complex ports to be implemented congruent with the FCC simple/complex porting rules.</p>
---------------------	--	---	--

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P- LSC	LNF	LNP Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date Rationale:		
Definition		This report measures the percentage of time BellSouth applies a 10-digit trigger for orders containing ported telephone numbers prior to the due date.		Parties Agree to leave metric "as is" currently structured in the plan except for resolution of Tier-II elimination that is highlighted.
Exclusions		<ul style="list-style-type: none"> • Remote Call Forwarding, DID's, and ISDN Data TN's • CLEC or customer caused misses or delays • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T) • Zero due dated expedited orders requested by the CLEC • Listing Orders Rationale: <ul style="list-style-type: none"> • Eliminate metric to simplify plan • AT&T consistently provides high level of performance. • Performance for the past 12 months, June '08 through May '09, has exceeded 99% against a benchmark of >= 95% for Florida. 		
Business Rules		The number of LNP orders where the 10-digit trigger was applied prior to the due date, divided by the total number of LNP orders where the 10-digit trigger was applicable.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	Percentage of 10-Digit Trigger Applications $\frac{a}{b} \times 100$ <ul style="list-style-type: none"> • a = Count of LNP orders for which a 10-digit trigger was applied prior to due date • b = Total LNP orders for which 10-digit triggers were applicable 		
Report Structure	<ul style="list-style-type: none"> • CLEC-Specific • CLEC-Aggregate • Geographic-Scope State 		
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation _____ SQM/SEEM Analog/Benchmark LNP _____ _____ 95%	SQM Level of Disaggregation SQM/SEEM Analog/Benchmark LNP >= 96.5%	
SEEM Measure	SEEM _____ Tier I _____ Tier II Yes X X		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
P-13D	LDT	LNP-Disconnect Timeliness (Non-Trigger)		
Business Rules		<p>Disconnect Timeliness is the elapsed time from when BellSouth's AT&T receives a valid "Number Ported" message in ESI Number Manager (signifying the CLEC "activate") for each telephone number ported until each number is disconnected in the BellSouth's AT&T switch. Non-business hours will be excluded from the duration calculation for unscheduled LNP ports.</p> <p>Rationale: Remove references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.</p>		Parties Agree to leave metric "as is" currently structured in the plan except for resolution of Tier-II elimination that is highlighted.
SQM Disaggregation Analog/Benchmark			<p>SQM Level of Disaggregation SQM:SEEM Analog Benchmark</p> <p>LNP (Normal Working Hours and Approved After Hours) 95.0% ≤ 4 Hours</p> <p>LNP (Unscheduled After Hours Ports) 95.9% ≤ 4 Hours (excluding non-business hours)</p>	
SEEM Measure		<p>SEEM Tier I ----- Tier II</p> <p>Yes ----- X ----- X</p> <p>Rationale: Eliminate Tier 2 remedies. Local market irreversibly open. Thirteen years since passage of 96 Telecom Act. Tier 2 incentive to prevent backsliding no longer needed.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Provisioning	
<u>New</u>		<u>Average Time Required to Update 911 Database (Facility Based Providers)</u>		
			<p><u>Definition</u> <u>The average time it takes to update the 911 database file.</u></p> <p><u>Exclusions</u> None</p> <p><u>Business Rules</u> <u>The clock starts on the date/time when the data processing starts and the clock stops on the date/time when the data processing is complete.</u></p> <p><u>Calculation</u> $\frac{\sum(\text{Date and time data processing begins} - \text{date and time data processing ends})}{\text{total number of files}}$</p> <p><u>Report Structure</u> Reported for individual CLEC, all CLECs and AT&T.</p> <p><u>SQM Disaggregation - Analog/Benchmark</u></p> <p><u>SQM Level of Disaggregation</u> <input type="radio"/> None</p> <p><u>Measurement Type</u> <input type="checkbox"/> Tier 1 - Low <input type="checkbox"/> Tier 2 - None</p> <p><u>Benchmark</u> <u>Parity</u></p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		<u>SEEM Measure</u> <u>SEEM</u> <u>Tier I</u> <u>Tier II</u> <u>Yes</u>X.....X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
<u>New</u>		<u>Percent Database Accuracy</u>		
			<p><u>Definition</u> <u>Measures the percentage of database updates completed without error reported for 911 Database.</u></p> <p><u>Exclusions</u> <u>CLEC Caused errors</u></p> <p><u>Business Rules</u> <u>Any test transactions not submitted in connection with the pre-ordering, ordering, provisioning or maintenance of actual customers.</u></p> <p><u>Notes:</u> <u>CLECs reserve the right to request additional databases be included in this measure.</u></p> <p><u>Calculation</u> $\frac{((\text{Count of Updates Completed without error}) \div (\text{Count of Updates Completed})) \times 100}{100}$</p> <p><u>Report Structure</u> <u>Monthly from the E911 database. Individual CLEC, CLECs in the aggregate, by ILEC (if analog applies) and by ILEC Affiliates</u></p> <p><u>SQM Disaggregation - Analog/Benchmark</u> <u>None</u></p> <p><u>SQM Level of Disaggregation</u></p> <p><u>Measurement Type</u> <u>Tier 1 - Low</u> <u>Tier 2 - None</u></p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		<u>Benchmark</u> Parity <u>SEEM Measure</u> <u>SEEM</u> <u>Tier I</u> <u>Tier II</u> Yes.....X.....X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
<u>New</u>		<u>911- Average Time to Clear Errors</u>		
			<p><u>Definition</u> <u>The average time it takes to clear an error after it is detected during the processing of the 911 database file. This is only on resale or UNE loop and port combination orders that AT&T installs.</u></p> <p><u>Exclusions</u> <u>None</u></p> <p><u>Business Rules</u> <u>The clock starts upon the receipt of the error file and the clock stops when the error is corrected.</u></p> <p><u>Calculation</u> <u>$\Sigma(\text{Date and time error detected} - \text{date and time error cleared}) \div \text{total number of errors}$</u></p> <p><u>Report Structure</u> <u>Reported for CLEC, all CLECs and AT&T.</u></p> <p><u>SQM Disaggregation - Analog/Benchmark</u></p> <p><u>SQM Level of Disaggregation</u> <u>None</u></p> <p><u>Measurement Type</u> <u>Tier 1 - Low</u> <u>Tier 2 - None</u></p> <p><u>Benchmark</u> <u>Parity</u></p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		<u>SEEM Measure</u> <u>SEEM</u> <u>Tier I</u> <u>Tier II</u> Yes.....X.....X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Provisioning	
<u>New</u>		<u>Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs</u>		
			<p><u>Definition</u> <u>The percentage of DA database updates completed within 72 hours of receipt of the update from the CLEC for directory change only and within 72 hours of the completion date on the provisioning service order where a provisioning order is required.</u></p> <p><u>Exclusions</u> <u>Excludes Weekends and Holidays.</u></p> <p><u>Business Rules</u> <u>The date and time stamp on fax updates starts the clock and the date and time when the listing is updated stops the clock. For directory changes that also have a provisioning order, the clock starts when the provisioning order completes and ends when the listing is updated. The update clerks work hours are 6:30 a.m. to 3:00 p.m. Monday through Friday. On requests received after 3:00 p.m. the clock will start at 6:30 a.m. the following day.</u></p> <p><u>Calculation</u> <u>(Count of updates completed within 72 hours ÷ total updates) * 100</u></p> <p><u>Report Structure</u> <u>Reported by CLEC and all CLECs for facility based providers.</u></p> <p><u>SQM Disaggregation - Analog/Benchmark</u> <u>SQM Level of Disaggregation</u></p> <ul style="list-style-type: none"> <input type="radio"/> 95% within 72 hours <input type="radio"/> 95% within (X) hours (Diagnostic) <input type="radio"/> 90% within (X) hours (Diagnostic) <p><u>Measurement Type</u></p>	<p>Parties agree for Florida only that CLECs withdraw request for this metric.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		<p>Tier 1 <u>Low</u></p> <p>Tier 2 <u>None</u></p> <p>Benchmark</p> <p><input type="radio"/> <u>95% updated within 72 hours. Critical z-value does not apply.</u></p> <p><input type="radio"/> <u>Diagnostic -- 95% within (X) Hours</u></p> <p><input type="radio"/> <u>Diagnostic -- 90% within (X) Hours</u></p> <p>SEEM Measure</p> <p>SEEM Tier I Tier II</p> <p>Yes.....X.....X</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
<u>New</u>		<u>Directory Assistance- Database Update Accuracy</u>		
			<p><u>Definition</u> <u>Directory Assistance. For Directory Assistance updates completed during the reporting period, the update order that the CLEC sent to AT&T is compared to the Directory Assistance database following completion of the update by AT&T. An update is "completed without error" if the Directory Assistance database accurately reflects the new listing, listing deletion or listing modification, submitted by the CLEC.</u></p> <p><u>Exclusions</u> None</p> <p><u>Business Rules</u> This measurement will be performed using statistically valid samples.</p> <p><u>Calculation</u> Numerator is the number of updates completed without error Denominator is the total number of updates</p> <p><u>Report Structure</u> State Specific with a CLEC specific report and a CLEC Aggregate report.</p> <p><u>SQM Disaggregation - Analog/Benchmark</u> <u>SQM Level of Disaggregation</u> None</p>	<p>Parties agree for Florida only that CLECs withdraw request for this metric.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		<p>Measurement Type</p> <p><u>Tier 1 - Low</u></p> <p><u>Tier 2 - None</u></p> <p>Benchmark</p> <p><u>Parity</u></p> <p>SEEM Measure</p> <p><u>SEEM Tier I Tier II</u></p> <p><u>Yes.....X.....X</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Provisioning	
<u>New</u>		<u>Percentage of Electronic Updates that Flow Through the DSR process Without Manual Intervention</u>		
			<p>Definition <u>Percentage of DSRs from entry to distribution that progress through AT&T ordering systems to ALPS/LIRA.</u></p> <p>Exclusions <u>Rejected DSRs due to CLEC error.</u></p> <p>Business Rules <u>The number of DSRs, that flow through SWBT's ordering systems and are passed to ALPS/LIRA without manual intervention, divided by the total number of DSRs issued within the reporting period.</u></p> <p>Calculation <u>(Number of DSRs that flow through to ALPS/LIRA ÷ Total DSRs) * 100</u></p> <p>Report Structure <u>CLEC and All CLECs.</u></p> <p>SQM Disaggregation - Analog/Benchmark SQM Level of Disaggregation None</p> <p>Measurement Type <u>Tier 1 - Low</u> <u>Tier 2 - None</u></p> <p>Benchmark <u>97% Critical z-value does not apply.</u></p> <p>SEEM Measure</p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
		<u>SEEM</u> <u>Tier I</u> <u>Tier II</u> Yes.....X.....X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair
M&R-1	MR A	Percent Missed Repair Appointments	
Report Structure		Dispatch Non-Dispatch (<u>except trunks</u>) CLEC Specific CLEC Aggregate BellSouth-AT&T Aggregate Geographic Scope _State Rationale: Administrative update to correct omission in prior version	<p>Parties Agree except for resolution of Tier-II elimination that is highlighted.</p> <p>AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".</p>
SQM Disaggregation Analog/Benchmark		SQM Level of Disaggregation SQM-SEEM Analog Benchmark <ul style="list-style-type: none"> ● Resale Residence (Non-Design) Retail Residence (Non-Design) ● Resale Business (Non-Design) Retail Business (Non-Design) ● Resale Design Retail Design ● UNE Analog Loop (Design) Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops) ● UNE Analog Loop (Non-Design) Retail Residence and Business - POTS (Excluding Switch Based Feature 	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Troubles)</p> <ul style="list-style-type: none"> • UNE Digital Loop >= DS1 Retail Digital Loop >= DS1 • UNE EELs Retail DS1 DS3 • UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail • UNE ISDN/UDC/IDSL Retail ISDN - BRI • UNE Line Splitting ADSL Provided to Retail • UNE Other Design Diagnostic • UNE Other Non-Design Diagnostic • Local Interconnection Trunks Direct <u>comparison</u> Parity with Retail Trunks <p>Rationale:</p> <ul style="list-style-type: none"> • Combine DSL-like services into a single disaggregation <ul style="list-style-type: none"> o Performance standard for both existing disaggregations are identical (retail analog is ADSL service) o In Florida, no more than 14 CLEC missed appointments for UNE Line Splitting submeasure over the past 12 months. Combining this disaggregation with UNE xDSL will have minimal impact on reported results. • Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. AT&T has reported 17 CLEC missed appointments for these submeasures over that last 12 months, June 08 through May 09. In addition, with no applicable retail analogs for these submeasures, there is no substantive information being provided. • Administrative change for clarity 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	<p>SEEM — Tier I — Tier II</p> <p>Yes — X ————— X</p> <p>Revisions:</p> <ul style="list-style-type: none"> • Remove Tier 2 measures to SEEM — include X and Y only (to be implemented) — X • Eliminate Tier 2 revenues • Broad market interconnectivity open • Thirteen years since passage of 96 Telecom Act • Tier 2 incentive to prevent backsliding in long term costs 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair	
M&R-2	CTRR	Customer Trouble Report Rate <u>Net of Provisioning Trouble and Repeat Reports</u>		
Definition		This report measures the percentage of customer troubles <u>exclusive of provisioning and repeat trouble reports</u> closed within a calendar month.		Area for further negotiations by parties.
Exclusions		<p>Trouble tickets canceled at the CLEC request</p> <p>BellSouth AT&T trouble reports/lines associated with internal or administrative service</p> <p>Customer Provided Equipment (CPE) or CLEC Equipment Troubles</p> <p>Informational Tickets</p> <p><u>Provisioning trouble reports.</u> A provisioning trouble report is defined as any report that comes in within "X" calendar days of service order completion, where "X" is 5 days (POTS Non-Designed services) or 14 days (Designed services).</p> <p><u>Repeat trouble reports.</u> A repeat trouble is defined as a customer report on the same line circuit, received within 30 days of an original customer trouble report</p> <p>Troubles outside of BellSouth's AT&T's control</p> <p>-A cut or damaged cable, caused by other than BellSouth AT&T employees or contractors</p> <p>-Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth AT&T</p> <p>Rationale:</p> <p>Measure captures duplicative data reported in P-9, (PPF), Percent Provisioning Troubles within "X" Days of Service Order Completion and</p>		AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments																														
Business Rules	<p>Customer Trouble Report Rate contains all closed customer and/or CLEC direct reports, net of provisioning and including repeat reports, divided by the total "number of service" lines.</p>																																
Calculation	<p>Customer Trouble Report Rate = (a / b) X 100</p> <p>a = Count of initial and repeated customer trouble reports (net of provisioning and repeat trouble reports) closed in the current reporting period</p> <p>b = Number of lines in service at end of the reporting period</p>																																
Report Structure	<p>Dispatch/Non-Dispatch (except trunks)</p> <p>CLEC Specific</p> <p>CLEC Aggregate</p> <p>BellSouth-AT&T Aggregate</p> <p>Geographic Scope</p> <ul style="list-style-type: none"> State <p>Rationale:</p> <p>Administrative update to correct omission in prior version</p>																																
SQM Disaggregation Analog/Benchmark	<table border="0"> <tr> <td colspan="2">SQM Level of Disaggregation</td> <td>SQM/SEEM</td> </tr> <tr> <td colspan="3">Analog/Benchmark</td> </tr> <tr> <td>Resale Residence (Non-Design)</td> <td>Retail Residence (Non-Design)</td> <td></td> </tr> <tr> <td>Resale Business (Non-Design)</td> <td>Retail Business (Non-Design)</td> <td></td> </tr> <tr> <td>Resale Design</td> <td>Retail Design</td> <td></td> </tr> <tr> <td>UNE Analog Loop (Design)</td> <td>Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)</td> <td></td> </tr> <tr> <td>UNE Analog Loop (Non-Design)</td> <td>Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)</td> <td></td> </tr> <tr> <td>UNE Digital Loop >= DS1</td> <td>Retail Digital Loop >= DS1</td> <td></td> </tr> <tr> <td>UNE EELs Retail DS1/DS3</td> <td></td> <td></td> </tr> <tr> <td>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting)</td> <td>ADSL Provided to Retail</td> <td></td> </tr> </table>	SQM Level of Disaggregation		SQM/SEEM	Analog/Benchmark			Resale Residence (Non-Design)	Retail Residence (Non-Design)		Resale Business (Non-Design)	Retail Business (Non-Design)		Resale Design	Retail Design		UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)		UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)		UNE Digital Loop >= DS1	Retail Digital Loop >= DS1		UNE EELs Retail DS1/DS3			UNE xDSL (HDSL, ADSL, and UCL , and Line Splitting)	ADSL Provided to Retail			
SQM Level of Disaggregation		SQM/SEEM																															
Analog/Benchmark																																	
Resale Residence (Non-Design)	Retail Residence (Non-Design)																																
Resale Business (Non-Design)	Retail Business (Non-Design)																																
Resale Design	Retail Design																																
UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)																																
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)																																
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1																																
UNE EELs Retail DS1/DS3																																	
UNE xDSL (HDSL, ADSL, and UCL , and Line Splitting)	ADSL Provided to Retail																																

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>UNE ISDN-UDC IDSL Retail ISDN – BRI</p> <p>UNE Line Splitting ADSL Provided to Retail</p> <p>UNE Other Design Diagnostic</p> <p>UNE Other Non-Design Diagnostic</p> <p>Local Interconnection Trunks <u>Direct comparison</u> Parity with Retail Trunks</p> <p>Rationale:</p> <p>Combining DSL-like services into a single disaggregation.</p> <p>Perfiled change standard for both existing disaggregations are identical (and are not) DSL service.</p> <p>The perfiled change results for the combination of these submeasures will be consistent with the results of each submeasure separately. Combining these disaggregations with UNE DSL will have no impact on reported results.</p> <p>Remove two Diagnostic disaggregations, UNE Other Design and UNE Other Non-Design. With no applicable retail analog or these submeasures for 12 months, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.</p> <p>Administrative change for clarity.</p>		
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>Yes.....X.....X</p> <p>Rationale:</p> <p>Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan.</p> <p>Eliminate Tier 2 remedies.</p> <p>Local market are visibly open.</p> <p>Fourteen years since passage of '96 Telecom Act.</p> <p>Tier 2 incentive to prevent backsliding no longer needed.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Maintenance & Repair	
M&R-3	MAD	Maintenance Average Duration		
Report Structure		Dispatch/Non-Dispatch (<u>except trunks</u>) <u>Affecting Service Out of Service (Non-Design only)</u> CLEC Specific CLEC Aggregate BellSouth/AT&T Aggregate Geographic Scope Rationale: Administrative update to correct omission in prior version. Propose changing reporting structure of Non-Design submeasure into Affecting Service (AS) and Out of Service (OOS). AT&T Local Field Operations manages workload subject to AS and OOS conditions for Retail and Wholesale. AS and OOS disaggregations will provide better Retail analog comparison.	Report Structure <u>Report should reflect those tickets received electronically and those received via call to center to access impact of ebonding.</u> <ul style="list-style-type: none"> •.....Dispatch/Non-Dispatch •.....CLEC Specific •.....CLEC Aggregate •.....BellSouth Aggregate •.....Geographic Scope State	Area for further negotiations by parties. AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".
SQM Disaggregation Analog/Benchmark		SQM Level of Disaggregation Analog/Benchmark Resale Residence (Non-Design) Residence (Non-Design) Resale Business (Non-Design) (Non-Design) Resale Design UNE Analog Loop (Design) Residence, Business and Design (Dispatch) (Excluding Digital Loops) UNE Analog Loop (Non-Design)	SQM/SEEM Retail Retail Business Retail Design Retail Retail	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Residence and Business - POTS (Excluding Switch Based Feature Troubles)</p> <p>UNE Digital Loop > DS1 Retail Digital Loop >= DS1</p> <p>UNE EELS Retail DS1 DS3</p> <p>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail</p> <p>UNE ISDN/UDC/IDSL Retail ISDN - BRI</p> <p>UNE Line Splitting ADSL Provided to Retail</p> <p>UNE Other Design Diagnostic</p> <p>UNE Other Non-Design Diagnostic</p> <p>Local Interconnection Trunks <u>Direct</u> comparison Parity with Retail Trunks</p> <p>Rationale:</p> <p>Combine DS1 line services into a single disaggregation.</p> <p>Performance standard for both existing disaggregations and identical (analog is retail ADSL services).</p> <p>The performance results for the combination of these submeasures will be consistent with the results of each submeasure separately. Combining this disaggregation with UNE xDSL will have minimal impact on reported results.</p> <p>Remove two Diagnostic Disaggregations, UNE Other Design and UNE other Non-Design. With no applicable retail analogs for these submeasures for at least the next 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.</p> <p>Administrative change for clarity.</p>		
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>Yes.....X.....X</p> <p>Rationale:</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Section 101.0101, subpart 1A to reflect AT&T's proposal to</p> <p>1. Add a new subpart 1A.0101.0101</p> <p>2. Add a new subpart 1A.0101.0102</p> <p>3. Add a new subpart 1A.0101.0103</p> <p>4. Add a new subpart 1A.0101.0104</p> <p>5. Add a new subpart 1A.0101.0105</p> <p>6. Add a new subpart 1A.0101.0106</p> <p>7. Add a new subpart 1A.0101.0107</p> <p>8. Add a new subpart 1A.0101.0108</p> <p>9. Add a new subpart 1A.0101.0109</p> <p>10. Add a new subpart 1A.0101.0110</p> <p>11. Add a new subpart 1A.0101.0111</p> <p>12. Add a new subpart 1A.0101.0112</p> <p>13. Add a new subpart 1A.0101.0113</p> <p>14. Add a new subpart 1A.0101.0114</p> <p>15. Add a new subpart 1A.0101.0115</p> <p>16. Add a new subpart 1A.0101.0116</p> <p>17. Add a new subpart 1A.0101.0117</p> <p>18. Add a new subpart 1A.0101.0118</p> <p>19. Add a new subpart 1A.0101.0119</p> <p>20. Add a new subpart 1A.0101.0120</p> <p>21. Add a new subpart 1A.0101.0121</p> <p>22. Add a new subpart 1A.0101.0122</p> <p>23. Add a new subpart 1A.0101.0123</p> <p>24. Add a new subpart 1A.0101.0124</p> <p>25. Add a new subpart 1A.0101.0125</p> <p>26. Add a new subpart 1A.0101.0126</p> <p>27. Add a new subpart 1A.0101.0127</p> <p>28. Add a new subpart 1A.0101.0128</p> <p>29. Add a new subpart 1A.0101.0129</p> <p>30. Add a new subpart 1A.0101.0130</p> <p>31. Add a new subpart 1A.0101.0131</p> <p>32. Add a new subpart 1A.0101.0132</p> <p>33. Add a new subpart 1A.0101.0133</p> <p>34. Add a new subpart 1A.0101.0134</p> <p>35. Add a new subpart 1A.0101.0135</p> <p>36. Add a new subpart 1A.0101.0136</p> <p>37. Add a new subpart 1A.0101.0137</p> <p>38. Add a new subpart 1A.0101.0138</p> <p>39. Add a new subpart 1A.0101.0139</p> <p>40. Add a new subpart 1A.0101.0140</p> <p>41. Add a new subpart 1A.0101.0141</p> <p>42. Add a new subpart 1A.0101.0142</p> <p>43. Add a new subpart 1A.0101.0143</p> <p>44. Add a new subpart 1A.0101.0144</p> <p>45. Add a new subpart 1A.0101.0145</p> <p>46. Add a new subpart 1A.0101.0146</p> <p>47. Add a new subpart 1A.0101.0147</p> <p>48. Add a new subpart 1A.0101.0148</p> <p>49. Add a new subpart 1A.0101.0149</p> <p>50. Add a new subpart 1A.0101.0150</p> <p>51. Add a new subpart 1A.0101.0151</p> <p>52. Add a new subpart 1A.0101.0152</p> <p>53. Add a new subpart 1A.0101.0153</p> <p>54. Add a new subpart 1A.0101.0154</p> <p>55. Add a new subpart 1A.0101.0155</p> <p>56. Add a new subpart 1A.0101.0156</p> <p>57. Add a new subpart 1A.0101.0157</p> <p>58. Add a new subpart 1A.0101.0158</p> <p>59. Add a new subpart 1A.0101.0159</p> <p>60. Add a new subpart 1A.0101.0160</p> <p>61. Add a new subpart 1A.0101.0161</p> <p>62. Add a new subpart 1A.0101.0162</p> <p>63. Add a new subpart 1A.0101.0163</p> <p>64. Add a new subpart 1A.0101.0164</p> <p>65. Add a new subpart 1A.0101.0165</p> <p>66. Add a new subpart 1A.0101.0166</p> <p>67. Add a new subpart 1A.0101.0167</p> <p>68. Add a new subpart 1A.0101.0168</p> <p>69. Add a new subpart 1A.0101.0169</p> <p>70. Add a new subpart 1A.0101.0170</p> <p>71. Add a new subpart 1A.0101.0171</p> <p>72. Add a new subpart 1A.0101.0172</p> <p>73. Add a new subpart 1A.0101.0173</p> <p>74. Add a new subpart 1A.0101.0174</p> <p>75. Add a new subpart 1A.0101.0175</p> <p>76. Add a new subpart 1A.0101.0176</p> <p>77. Add a new subpart 1A.0101.0177</p> <p>78. Add a new subpart 1A.0101.0178</p> <p>79. Add a new subpart 1A.0101.0179</p> <p>80. Add a new subpart 1A.0101.0180</p> <p>81. Add a new subpart 1A.0101.0181</p> <p>82. Add a new subpart 1A.0101.0182</p> <p>83. Add a new subpart 1A.0101.0183</p> <p>84. Add a new subpart 1A.0101.0184</p> <p>85. Add a new subpart 1A.0101.0185</p> <p>86. Add a new subpart 1A.0101.0186</p> <p>87. Add a new subpart 1A.0101.0187</p> <p>88. Add a new subpart 1A.0101.0188</p> <p>89. Add a new subpart 1A.0101.0189</p> <p>90. Add a new subpart 1A.0101.0190</p> <p>91. Add a new subpart 1A.0101.0191</p> <p>92. Add a new subpart 1A.0101.0192</p> <p>93. Add a new subpart 1A.0101.0193</p> <p>94. Add a new subpart 1A.0101.0194</p> <p>95. Add a new subpart 1A.0101.0195</p> <p>96. Add a new subpart 1A.0101.0196</p> <p>97. Add a new subpart 1A.0101.0197</p> <p>98. Add a new subpart 1A.0101.0198</p> <p>99. Add a new subpart 1A.0101.0199</p> <p>100. Add a new subpart 1A.0101.0200</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM#	Measure Category Code	Title of the Measure	<h2>Maintenance & Repair</h2>
M&R-4	PRT	Percent Repeat Customer Troubles within 30 Calendar Days	
Business Rules		<p>Business Rules</p> <p>Customer trouble reports considered for this measure are those on the same line/circuit, received within 30 calendar days of an original customer trouble report. Candidates for this measure are determined by using either the 'cleared date' from LMOS or the 'closed date' from WFA of the first trouble, and the 'received date' of the next trouble. <u>Should the measure be from ACTS, EBTA, CPSS, is WFA correct place to measure and if yes why?</u></p>	<p>Parties Agree except for resolution of Tier-II elimination that is highlighted.</p> <p>AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison". CLECs agree to all other proposed changes by AT&T except for Tier-II elimination.</p>
Report Structure	<p>patch/Non-Dispatch (except trunks)</p> <p>EC Specific</p> <p>EC Aggregate</p> <p>SouthAT&T Aggregate</p> <p>ographic Scope</p> <p>_State</p> <p>Rationale:</p> <p>Administrative update to correct omission in prior version</p>		
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation</p> <ul style="list-style-type: none"> Resale Residence (Non-Design) Resale Business (Non-Design) 	<p>SQM/SEEM Analog/Benchmark</p> <ul style="list-style-type: none"> Retail Residence (Non-Design) Retail Business (Non-Design) 	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Design)</p> <ul style="list-style-type: none"> • Resale Design Retail Design • UNE Analog Loop (Design) Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops) • UNE Analog Loop (Non-Design) Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles) • UNE Digital Loop >= DS1 Retail Digital Loop >= DS1 • UNE EELs Retail DS1 DS3 • UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL Provided to Retail • UNE ISDN/UDC/IDSL Retail ISDN - BRI • UNE Line Splitting ADSL Provided to Retail • UNE Other Design Diagnostic • UNE Other Non-Design Diagnostic • Local Interconnection Trunks <u>Direct</u> <u>comparisonParity with Retail Trunks</u> <p>Rationale,</p> <p>Combine DS1 like services into a single disaggregation.</p> <p>Performance standard for both existing disaggregations are identical (analog is retail ADSL services).</p> <p>AT&T has reported less than 20 CLEC repeat trouble reports over the last 12 months, June 08 through May 09, for the Line Splitting submeasure. The performance results for the combination of these submeasures will be consistent with the results of each submeasure separately. Combining this disaggregation with UNE xDSL will have minimal impact on reported results.</p> <p>Remove two Diagnostic disaggregations, UNE Other Design and UNE other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.</p> <p>Administrative change for clarity.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	<p>SEEM _____ Tier I _____ Tier II</p> <p>Yes X</p> <p>.....</p> <ul style="list-style-type: none"> • The Commission's 2001 Order, AT&T's proposal to transition to a market-based system. • Eliminate 101.21 amendments. • Eliminate 101.21.100. • This change is since passage of 9th Telecom Act. • This Measure to present necessity no longer needed. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Maintenance & Repair	
M&R-5	OOS	Out of Service (OOS) > 24 Clock Hours		
Business Rules			Customer trouble reports that are out of service and cleared in excess of 24 clock hours. The clock starts when the customer trouble report is created in LMOS/WFA and is counted if the elapsed time exceeds 24 clock hours. <u>Should ACTS, EBFA, CPSS be used?</u>	Area to be subject of PSC Workshop and ultimately staff recommendation.
Report Structure		Dispatch/Non-Dispatch (<u>except trunks</u>) CLEC Specific CLEC Aggregate BellSouth AT&T Aggregate Geographic Scope - _____ State Rationale: Administrative change to correct omission in prior version		AT&T agrees to reinsert "Parity" instead of proposed "Direct Comparison".
SQM Disaggregation Analog/Benchmark		SQM Level of Disaggregation Analog/Benchmark Resale Residence (Non-Design).....Retail Residence (Non-Design) Resale Business (Non-Design).....Retail Business (Non-Design) Resale DesignRetail Design UNE Analog Loop (Design)Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops) UNE Analog Loop (Non-Design).....Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles) UNE Digital Loop >= DS1Retail Digital Loop >= DS1 UNE EELS.....Retail DS1/DS3		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>UNE xDSL (HDSL, ADSL, and UCL, and Line Splitting) ADSL provided to Retail</p> <p>UNE ISDN UDC IDSLRetail ISDN – BRI</p> <p>UNE Line Splitting ADSL Provided to Retail</p> <p>UNE Other Design Diagnostic</p> <p>UNE Other Non-Design Diagnostic</p> <p>Local Interconnection Trunks <u>Direct comparison</u> Parity with Retail Trunks</p> <p>Rationale</p> <p>Combining DSL-like services into a single disaggregation</p> <p>Performance standards for both existing disaggregations are identical (analog is retail ADSL service).</p> <p>AT&T has reported only one CLEC submission for the UNE Line Splitting submeasure for at least the last 12 months, June 08 through May 09. Combining this disaggregation will have no impact on reported results.</p> <p>Remove two Diagnostic Disaggregations, UNE Other Design, and UNE Other Non-Design. With no applicable retail analogs for these submeasures for at least the last 12-month period, there is no substantive information being provided. Discontinuing the production of these disaggregations will have no impact on results and will reduce the number of submeasures being processed.</p> <p>Administrative savings for clarity.</p>		
SEEM Measure	<p>SEEM _____ Tier I Tier II</p> <p>Yes _____ X X</p> <p>Rationale:</p> <ul style="list-style-type: none"> Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan. Eliminate Tier I remedies. Data captured by OOS is a duplicate of data captured by M&R-3. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Maintenance & Repair	
M&R-6	MAAT	Average Answer Time - Repair Centers		
SQM Disaggregation - Analog/Benchmark		SQM Level of Disaggregation SQM Analog/Benchmark BellSouth Direct comparison with AT&T Average Answer Time		Parties Agree to leave metric “as is” currently structured in the plan with the administrative change of AT&T where BellSouth currently appears.
SEEM Measure		SEEM.....Tier I.....Tier II No..... Rationale: Remove all references to SEEM to reflect CLEC's proposal to transition to commercial remedy plan.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Billing	
B+	BLA	Invoice Accuracy		
Definition		<p>This measure reports the accuracy of billing invoices rendered by BellSouth to wholesale and retail customers.</p> <p>Rationale</p> <p>Determine what metrics requirement to simplify plan</p> <p>Billing measurements for rendering bills to the CLEC's by the retail network since that impacts the CLEC customers</p> <p>There are current processes in place for dealing with invoice disputes on business-to-business basis. Processes are provided within the Billing Section of the CLEC website at http://clec.gtc.com/clec/.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions		<ul style="list-style-type: none"> Adjustments not related to billing errors (e.g., credits for service outage, special promotion credits, adjustments to satisfy the customer, adjustments as per agreements and/or settlements with CLEC, adjustments related to the implementation of regulatory mandated or contract negotiated rate changes) <p>Test Accounts</p>		
Business Rules		Absolute value of total billed revenue and absolute value of adjustment amounts related to billing errors and manual OC & C's (Other Charges and Credits) indicative of back billing errors or manual back billing greater than 3 bill periods appearing on the bill during the report month are used to compute invoice accuracy. All bill periods are included in a report month.		
Calculation		$\text{Invoice Accuracy} = \frac{100 - \left(\frac{A}{B} \right) \times 100}{C}$ <p>A = Absolute value of total billed revenue with manual adjustments</p> <p>B = Absolute value of total billing error related adjustments entered during a report month</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Report Structure	<ul style="list-style-type: none"> • CLEC Specific • CLEC Aggregate • BellSouth Aggregate • Geographic Scope • State • Number of Adjustments 		
SQM Disaggregation—Analog/Benchmark	<p>By CLEC or Disaggregation</p> <p>MMI or TDM Analog Benchmark</p> <p>By CLEC or Disaggregation</p> <p>By CLEC or Disaggregation</p> <p>By CLEC or Disaggregation</p> <p>By CLEC or Disaggregation</p>		
SEEM Measure	<p>SEEM Tier I Tier II.....</p> <p>Yes X X</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Billing	
B-2	BIF	Mean Time to Deliver Invoices		
SQM Section	AT&T's Proposed Changes/Rationale		CLEC's proposed Changes/Rationale	
Definition	<p>This report measures the mean interval for timeliness of billing invoices delivered to USPS (U.S. Postal Service) or transmitted to the customer in an agreed upon format.</p> <p>Rationale</p> <p>Continued commitment to simplification.</p> <p>Billing recommendations for sending bills to the CLEC do not adversely affect or impact the CLEC customer.</p> <p>There are current processes in place for dealing with invoice disputes on a business-to-business basis. Processes are provided within the Billing Section of the CLEC Handbook at https://elec.att.com/elec.</p>			Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions	None			
Business Rules	<p>Invoice timeliness is determined by calculating the interval between the bill period date and actual transmission or distribution of the invoice.</p> <p>To determine the number of workdays, begin counting the bill period date as the first workday (or the next workday if the bill period date is a weekend or holiday). The invoice transmission date is counted as the last workday. Invoice transmission date is the workday the invoice is delivered to the Post Office or transmitted to the customer. CLEC bills and BellSouth bills transmitted in less than or equal to one-day difference will be considered parity.</p>			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Invoice Timeliness (a-b)</p> <ul style="list-style-type: none"> • a— Invoice-Transmission-Date • b— Bill-Cycle-Period-Date <p>Mean Time to Deliver Invoices (c-d)</p> <ul style="list-style-type: none"> • c— Sum of all invoice-timeliness-intervals • d— Count of invoices transmitted in reporting period 		
Report Structure	<ul style="list-style-type: none"> • CLEC-Specific • CLEC-Aggregate • BellSouth-Aggregate • Geographic-Scope <p>State</p>		
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation</p> <p>— SQM-SEEM Analog-Benchmark</p> <p>The average delivery intervals are compared as follows:</p> <ul style="list-style-type: none"> • Resale-CRIS — Retail-CRIS • UNE-CRIS — Retail-CRIS • Interconnection-UNE-CABS — Retail-CABS 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	SEEM — Tier I ——— Tier II Yes — X ————— X		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Billing	
B-5	BUDT	Usage Data Delivery Timeliness		
Definition		<p>There are no processes in place to ensure that data is consistently reported and that data is complete and accurate. Billing systems are not in place to ensure that billing information is accurate.</p> <p>Rationale:</p> <p>Implementing a new requirement to simplify plan</p> <p>Billing requirements for providing bills to the CLEC do not measure performance that impacts the CLEC customers.</p> <p>There are no processes in place for dealing with any disputes or a system of business rules. Processes are provided within the Billing Section of the CLEC. Link back at http://denver.rii.com</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions	None			
Business Rules		<p>There are no business rules in place to ensure that data is consistently reported and that data is complete and accurate. Billing systems are not in place to ensure that billing information is accurate.</p> <p>BellSouth systems and facilities belong to BellSouth and are not under CLEC control. Method of delivery is under control of the CLEC.</p>		
Calculation		<p>Usage Data Delivery Timeliness Current Month = (a / b) X 100</p> <p>Total number of usage records sent within six (6) calendar days from initial recording receipt</p> <p>b = Total number of usage records sent during the reporting period</p>		
Report Structure		<p>CLEC Aggregate</p> <p>CLEC Specific</p> <p>Geographic Scope</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Level of Disaggregation - Analog/Benchmark	<p>SQM Level of Disaggregation - Analog Benchmark</p> <p>SQM SEEM Analog Benchmark</p> <p>Usage Data Delivery Timeliness</p> <p>95% in Six Calendar Days</p>	<p>SQM Level of Disaggregation - Analog Benchmark</p> <p>SQM Level of Disaggregation - SQM SEEM Analog Benchmark</p> <ul style="list-style-type: none"> Usage Data Delivery Timeliness >= 95% in Six Calendar Days 	
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>Yes X X</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Billing	
B-10	BEC	Percent Billing Adjustment Requests (BAR) Responded to within 40 Business Days	Percent Billing Adjustment Requests (BAR) Responded to within 25 40 Business Days	Area to be subject of PSC Workshop and ultimately staff recommendation.
Definition		<p>This report measures timely responses to carrier bill adjustment requests.</p> <ul style="list-style-type: none"> • This measure is a performance metric required to support the plan. • This measure is a performance metric for tracking bills in the CLEC to improve service performance for impacted CLEC customers. • This measure is a performance metric in place for dealing with invoice disputes on a business to business basis. Processes are in place within the BellSouth network to deal with such disputes. www.bellsouth.com. 		
Exclusions		Adjustments initiated by BellSouth	Adjustments initiated by BellSouth <u>IXC Access billing adjustment</u>	
Business Rules		<p>This measure applies to CLEC wholesale bill adjustment requests. IXC Access billing adjustment requests are not reflected in this measure. Elapsed time is measured in business days. The clock starts when BellSouth receives the CLEC Billing Adjustment Request (BAR) form and the clock stops when BellSouth either makes an adjustment through BOCRIS or ACATS (generally next CLEC bill unless adjustment request after middle of the month) or BellSouth denies the request in BDATS or ACATS WebTAXI and BellSouth notifies the CLEC of the BAR request resolution. BellSouth will report separately those adjustment requests that are disputed by BellSouth. (BAR form and instructions are found at www.interconnection.bellsouth.com/forms/html/billing&collections.html)</p>	<p>Business Rules</p> <p>This measure applies to CLEC wholesale bill adjustment requests. IXC Access billing adjustment requests are not reflected in this measure. Elapsed time is measured in business days. The clock starts when BellSouth receives the CLEC Billing Adjustment Request (BAR) form and the clock stops when BellSouth either makes an adjustment through BOCRIS or ACATS (generally next CLEC bill unless adjustment request after middle of the month) or BellSouth denies the request in BDATS or ACATS and BellSouth notifies the CLEC of the BAR resolution. BellSouth will report separately those adjustment requests that are disputed by BellSouth. (BAR form and instructions are found at www.interconnection.bellsouth.com/forms/html/billing&collections.html)</p> <p><u>Should this language be changed to include ExClaim?</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Percent Billing Adjustments Responded to within 40 Business Days = (a / b) X 100</p> <p>a = Total number of BAR requests received in the data month that were responded to in 40 business days</p> <p>b = Total number of BAR requests received in the data month</p>	<p>Percent Billing Adjustments Responded to within 25 40 Business Days = (a / b) X 100</p> <p>a = <u>Total</u> number of BAR requests received in the data month that were responded to in 40 <u>25</u> business days</p> <p>b = Total number of BAR requests received in the data month</p>	
Report Structure	<p>1. Introduction</p> <p>1.1. Background</p> <p>1.2. Regulatory Authority</p> <p>2.</p>		
SQM Disaggregation - Analog/Benchmark	<p>SQM Level of Disaggregation ----- SQM/SEEM Analog/Benchmark</p> <p>Percent Billing Adjustment Requests responded to ----- 95% ----- ----- 25 40 business days</p>	<p>SQM Disaggregation - Analog/Benchmark</p> <p>SQM Level of Disaggregation</p> <p>SQM/SEEM Analog/Benchmark</p> <ul style="list-style-type: none"> Percent Billing Adjustment Requests responded to ----- 95% <= 25 40 business days 	
SEEM Measure	<p>SEEM Tier I ----- Tier II</p> <p>Yes ----- X ----- X</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	<h1>Trunk Group Performance</h1>	
TG P-1	TGP	Trunk Group Performance		
SQM Section	AT&T's Proposed Changes/Rationale		CLEC's proposed Changes/Rationale	
Definition	<p>This report displays Trunk Group blocking performance for both BellSouth and CLECs—Percentage of calls blocked on outgoing traffic for alternate final and direct final trunk groups from AT&T end office to CLEC end office and from AT&T Tandem to CLEC end office.</p> <p><u>Remarks:</u></p> <p>Trunk group percentages of blocked calls caused by AT&T equipment failures are not included in this report. AT&T's impact to the end user is reported.</p> <p>The AT&T Tandem Planning and Engineering Group performs a common Trunk Group monitoring, planning, and analysis for all trunk groups. Modification required for this measure will ensure alignment of treatment for these territories within this common resource.</p> <p>Previously completed changes for this measure have been successfully implemented within other AT&T regions.</p> <p>This measure has been met for the last 12 months of data, from June 2008 to May 2009.</p>		Parties Agree to AT&T's proposed changes except for resolution of Tier-II elimination that is highlighted.	
Exclusions	<ul style="list-style-type: none"> • Trunk groups blocked due to unanticipated significant increases in CLEC traffic (An unanticipated, significant increase in traffic is indicated by a 20% increase for small trunk groups or 1800 CCS for large groups over the previous month's traffic when the increase was not forecasted by the CLEC.) • Orders delayed or refused by CLEC • Trunk groups for which valid data is not available for an entire reporting period • Duplicate trunk group information 			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<ul style="list-style-type: none"> •.....<u>Trunk groups blocked due to CLEC network equipment failure</u> •.....<u>Final groups actually overflowing, not blocked</u> •.....<u>Excludes Weekends and Holidays</u> •.....<u>CLECs have trunks basied-out for maintenance at their end, or have other network problems that are under their control.</u> •.....<u>Blocking caused by unplanned load on a CLEC's network</u> •.....<u>AT&T is ready for turn-up on Due Date and CLEC is not ready or not available for turn-up of trunks, e.g. not ready to accept traffic from AT&T on the due date or CLEC has no facilities or equipment at CLEC end.</u> •.....<u>CLEC does not take action upon receipt of Trunk Group Service Request (TGSR) or ASR within 3 business days (day 0 is the business day the TGSR is emailed faxed to the CLEC) when a Call Blocking situation is identified by AT&T or in the timeframe specified in the InterConnection Agreement (ICA).</u> •.....<u>If CLEC does not take action upon receipt of TGSR within 10 business days (day 0 as described above) when a pre-service of 75% or greater occupancy situation is identified by AT&T or in the time frame specified in the ICA.</u> •.....<u>If CLEC fails to provide a forecast within the last six months unless a different timeframe is specified in an interconnection agreement.</u> •.....<u>If a CLEC's actual trunk usage as shown by AT&T from traffic usage studies is more than 25% above the CLEC's most recent forecast which must have been provided within the last six months.</u> •.....<u>New trunk groups that have not been in service for three months may be excluded from calculations for that 3-month period. Nevertheless, utilization data will be gathered upon the turn-up of the trunk group.</u> <p><u>The exclusions do not apply if AT&T fails to timely provide CLEC with traffic utilization data reasonably required for CLEC to develop its forecast or if AT&T refuses to accept CLEC trunk orders (ASRs or TGSRs) that are within the CLEC's reasonable forecast regardless of the current usage data.</u></p> <ul style="list-style-type: none"> •.....<u>Provide a realistic view of the source of blocking to accurately measure customer service provided by AT&T</u> 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p> This report is a summary of data provided by BellSouth and CLEC's for the purpose of the Trunk Group Performance report. The purpose of the Trunk Group Performance report is to provide trunk blocking measurements on CLEC and BellSouth trunk groups for comparison only. It is not the intent of the report that it be used for network management and/or engineering. </p> <p> Monthly Average Blocking: </p> <ul style="list-style-type: none"> — The reporting cycle includes both business and non-business days in a calendar month. — Monthly average blocking values are calculated for each trunk group for each of the 24 time-consistent hours across a reporting cycle. <p> Aggregate Monthly Blocking: </p> <ul style="list-style-type: none"> — Used to compare aggregate blocking across trunk groups which terminate traffic at CLEC points of presence versus BellSouth switches. — Aggregate monthly blocking data is calculated for each hour of the day across all trunk groups assigned to a category. <p> Trunk Categorization: </p> <ul style="list-style-type: none"> — This report displays, over a reporting cycle, aggregate, average blocking data for each hour of a day. Therefore, for each reporting cycle, 24 blocking data points are generated for two aggregate groups of selected trunk groups. These groups are CLEC-affecting and BellSouth-affecting trunk groups. In order to assign trunk groups to each aggregate group, all trunk groups are first assigned to a category. A trunk group's end points and the type of traffic that is transmitted on it define a category. Selected categories of trunk groups are assigned to the aggregate groups so that trunk reports can be generated. The categories to which trunk groups have been assigned for this report are as follows: <p> CLEC-Affecting Categories: </p> <ul style="list-style-type: none"> — Point A Point A Category 1: BellSouth E Category 3: BellSouth E Category 4: BellSouth Le Category 5: BellSouth Ac Category 10: BellSouth E Category 16: BellSouth 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>BellSouth Affecting Categories:</p> <p>Point A Point</p> <p>Category 1: BellSouth 4</p> <p>Category 9: BellSouth 4</p> <p>Category 10: BellSouth 4</p> <p>Category 16: BellSouth 4</p>		
Calculation	<p>Monthly Average Blocking:</p> <ul style="list-style-type: none"> For each hour of the day, each day's raw data are summed across all valid measurement days in a report cycle for blocked and attempted calls. The sum of the blocked calls is divided by the total number of calls attempted in a reporting period. <p>Aggregate Monthly Blocking:</p> <ul style="list-style-type: none"> For each hour of the day, the monthly sums of the blocked and attempted calls from each trunk group are separately aggregated over all trunk groups within each assigned category. The total blocked calls is divided by the total call attempts within a group to calculate an aggregate monthly blocking for each assigned group. The result is an aggregate monthly average blocking value for each of the 24 hours by group. The difference between the CLEC and BellSouth affecting trunk groups are also calculated for each hour. <p>Percent Blocked Calls = $(\frac{a - b}{c - b}) * 100$</p> <p>a = count of blocked calls</p> <p>b = excluded blocked calls</p> <p>c = total calls offered</p> <p>are engineered from a time consistent busy hour, not hourly data.</p>		
Report Structure	<p>CLEC Specific</p> <p>CLEC Aggregate</p> <p>BellSouth Aggregate</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Geographic Scope</p> <p>State</p> <p>Proposed to add 22 states to the BellSouth service area. All 22 states are currently served by AT&T.</p>		
<p>SQM Disaggregation Analog/Benchmark</p>	<p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <p>CLEC Aggregate and CLEC Specific BellSouth Aggregate</p> <p>Any 2 consecutive hours in a 24-hour period where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10 (where CLEC uses that Trunk Group) and 16 for CLECs and 1, 9, 10 (where BellSouth uses that Trunk Group) and 16 for BellSouth</p> <p><u>AT&T end office to CLEC end office</u> Blocked Calls on Dedicated Trunk Groups not to exceed blocking standard of B.01. [B.01 standard is 1%]</p> <p><u>AT&T tandem to end office trunk</u> Blocked Calls on Dedicated Trunk Groups not to exceed blocking standard of B.01. [B.01 standard is 1%]</p> <p>Standardize end office line provisioning metrics across the 22 states to accurately measure blocking impact and simplify the process of reporting CLEC blocking.</p>		
<p>SEEM Measure</p>	<p>SEEM Tier I Tier II</p> <p>Yes X <input checked="" type="checkbox"/></p> <ul style="list-style-type: none"> • Remove all references to SEEM to reflect AT&T's proposal to transition to an internal remedy plan • Eliminate Tier 2 remedies <ul style="list-style-type: none"> ○ Local market inevitably open ○ High revenue is side passage of the Telecom Act ○ Tier 2 incentive to prevent over-subsiding no longer needed. 		

SQM Section		AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM#	Measure Category Code	Title of the Measure	<h1>Collocation</h1>	
C+	ART	Collocation Average Response Time		
Definition	<p>This report measures the time it takes BellSouth to respond to the receipt of a complete and accurate collocation application. BellSouth must respond as to whether or not space is available within the required number of calendar days after having received a bona fide application for collocation.</p> <p>History:</p> <ul style="list-style-type: none"> • Collocation metric to support plan. • AT&T consistently provides a high level of performance. • Performance for past 12 months (June 2008 to May 2009) was 100% meeting target level for all levels of disaggregation. • Key stakeholder group members (SVMDD): Collocation Program Update Dec 2008. 		<h2>Parties Agree to keep metric "as is" currently structured in the plan.</h2>	
Exclusions	<ul style="list-style-type: none"> • Any application canceled by the CLEC 			
Business Rules	<p>The interval begins on the date BellSouth receives a complete and accurate collocation application accompanied by the appropriate application fee if required. The interval stops on the date BellSouth returns a response. The interval will restart upon receipt of changes to the original application request.</p>			
Calculation	<p>Response Time = (a - b)</p> <p>_____ a = Request Response Date</p> <p>_____ b = Request Submission Date</p> <p>Average Response Time = (c - d)</p> <p>_____ c = Sum of all response times</p> <p>_____ d = Count of responses returned within the reporting period</p>			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments																										
Report Structure	<ul style="list-style-type: none"> _____ CLEC Specific _____ CLEC Aggregate _____ Geographic Scope 																												
SQM Disaggregation Analog/Benchmark	<table border="0"> <tr> <td>SQM Level of Disaggregation Analog/Benchmark</td> <td>SQM</td> </tr> <tr> <td>Virtual-Initial Days</td> <td>45 Calendar Days</td> </tr> <tr> <td>Virtual-Augment Days</td> <td>45 Calendar Days</td> </tr> <tr> <td>Physical Caged-Initial Days</td> <td>45 Calendar Days</td> </tr> <tr> <td>Physical Caged-Augment Days</td> <td>45 Calendar Days</td> </tr> <tr> <td>Physical Cageless-Initial Days</td> <td>45 Calendar Days</td> </tr> <tr> <td>Physical Cageless-Augment Days</td> <td>45 Calendar Days</td> </tr> </table>	SQM Level of Disaggregation Analog/Benchmark	SQM	Virtual-Initial Days	45 Calendar Days	Virtual-Augment Days	45 Calendar Days	Physical Caged-Initial Days	45 Calendar Days	Physical Caged-Augment Days	45 Calendar Days	Physical Cageless-Initial Days	45 Calendar Days	Physical Cageless-Augment Days	45 Calendar Days	<p>gregation - Analog Benchmark</p> <p>SQM Level of Disaggregation Analog/Benchmark</p> <table border="0"> <tr> <td>Virtual-Initial</td> <td>45 <u>7</u>Calendar Days</td> </tr> <tr> <td>Virtual-Augment</td> <td>45 <u>7</u>Calendar Days</td> </tr> <tr> <td>Physical Caged-Initial</td> <td>45 <u>7</u>Calendar Days</td> </tr> <tr> <td>Physical Caged Augment</td> <td>45 <u>7</u>Calendar Days</td> </tr> <tr> <td>Physical Cageless-Initial</td> <td>45 <u>7</u>Calendar Days</td> </tr> <tr> <td>Physical Cageless-Augment</td> <td>45 <u>7</u>Calendar Days</td> </tr> </table>	Virtual-Initial	45 <u>7</u> Calendar Days	Virtual-Augment	45 <u>7</u> Calendar Days	Physical Caged-Initial	45 <u>7</u> Calendar Days	Physical Caged Augment	45 <u>7</u> Calendar Days	Physical Cageless-Initial	45 <u>7</u> Calendar Days	Physical Cageless-Augment	45 <u>7</u> Calendar Days	
SQM Level of Disaggregation Analog/Benchmark	SQM																												
Virtual-Initial Days	45 Calendar Days																												
Virtual-Augment Days	45 Calendar Days																												
Physical Caged-Initial Days	45 Calendar Days																												
Physical Caged-Augment Days	45 Calendar Days																												
Physical Cageless-Initial Days	45 Calendar Days																												
Physical Cageless-Augment Days	45 Calendar Days																												
Virtual-Initial	45 <u>7</u> Calendar Days																												
Virtual-Augment	45 <u>7</u> Calendar Days																												
Physical Caged-Initial	45 <u>7</u> Calendar Days																												
Physical Caged Augment	45 <u>7</u> Calendar Days																												
Physical Cageless-Initial	45 <u>7</u> Calendar Days																												
Physical Cageless-Augment	45 <u>7</u> Calendar Days																												
SEEM Measure	<table border="0"> <tr> <td>SEEM Tier I</td> <td>Tier II</td> </tr> <tr> <td>No</td> <td>.....</td> </tr> </table>	SEEM Tier I	Tier II	No	<p>sure</p> <table border="0"> <tr> <td>SEEM</td> <td>Tier I</td> <td>Tier II</td> </tr> <tr> <td>No</td> <td>YES</td> <td>..... X.....</td> </tr> </table>	SEEM	Tier I	Tier II	No	YES X.....																	
SEEM Tier I	Tier II																												
No																												
SEEM	Tier I	Tier II																											
No	YES X.....																											

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Collocation	
C-2	AT	Collocation Average Arrangement Time		
Definition		<p>This report measures the average time (in calendar days) for provisioning a collocation arrangement.</p> <p>Relevant:</p> <ul style="list-style-type: none"> Eliminate unnecessary complexity. AT&T consistently provides high level performance. Performance for past 12 months (June 2008 to May 2009) was often exceeding target level for all levels of service provision. Key service delivery metrics (SLA, MDD, etc.) are in excess of D.L. Data Metric. 		Parties Agree to keep metric "as is" currently structured in the plan.
Exclusions		<ul style="list-style-type: none"> Any bona fide firm order canceled by the CLEC Any bona fide firm order with a CLEC negotiated interval longer than the benchmark interval 		
Business Rules		The interval (in calendar days) for collocation arrangements begins on the date that BellSouth receives a complete and accurate bona fide firm order accompanied by the appropriate fee, if required, and ends on the date that BellSouth completes the collocation arrangement and notifies the CLEC.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Arrangement Time = (a - b)</p> <ul style="list-style-type: none"> • a = Date collocation arrangement is complete • b = Date order for collocation arrangement submitted <p>Average Arrangement Time = (c / d)</p> <ul style="list-style-type: none"> • c = Sum of all arrangement times • d = Total number of collocation arrangements completed during reporting period 		
Report Structure	<ul style="list-style-type: none"> • CLEC Specific • CLEC Aggregate • Geographic Scope — State 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation Analog/Benchmark</p> <p>Virtual Initial 60 Calendar Days</p> <p>Virtual Augment (without space increase) 60 Calendar Days</p> <p>Virtual Augment (with space increase) 60 Calendar Days</p> <p>Physical Caged-Initial 90 Calendar Days</p> <p>Physical Caged- Augment (without space increase) 15 Calendar Days</p> <p>Physical Caged- Augment (with space increase) 90 Calendar Days</p> <p>Physical Cageless-Initial 90 Calendar Days</p> <p>Physical Cageless- Augment (without space increase) 15 Calendar Days</p> <p>Physical Cageless- Augment (with space increase) 90 Calendar Days</p>	<p>SQM Disaggregation - Analog/Benchmark</p> <p>SQM Level of Disaggregation Analog/Benchmark</p> <ul style="list-style-type: none"> • Virtual-Initial 60 50 30 Calendar Days • Virtual Augment (without space increase) 60 45 30 Calendar Days • Virtual-Augment (with space increase) 60 45 30 Calendar Days • Physical Caged-Initial 90 76 15 Calendar Days • Physical Caged-Augment (without space increase) 45 24 Calendar Days • Physical Caged-Augment (with space increase) 90 76 24 Calendar Days • Physical Cageless-Initial 90 60 Calendar Days • Physical Cageless-Augment (without space increase) 45 24 Calendar Days • Physical Cageless-Augment (with space increase) 90 60 45 Calendar Days 	
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>No.....</p>	<p>sure</p> <p>SEEM Tier I Tier II</p> <p>No Yes..... X.....</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Collocation	
C-3	MDD	Collocation Percent of Due Dates Missed		
SEEM Measure		<p>SEEM _____ Tier I _____ Tier II</p> <p>Yes: _____ X _____ X</p> <p><i>Analysis:</i></p> <p>Remove all references to SEEM to reflect AT&T's proposed transition to existing metrics.</p> <p>Eliminate Tier 2 metrics.</p> <p>Use 1 metric to measure overall.</p> <p>Thirteen parties oppose passage of the Telecom Act.</p> <p>Tier 2 incentive to prevent backsliding no longer needed.</p>		<p>Parties Agree to keep metric "as is" currently structured in the plan except for resolution of Tier-II elimination that is highlighted.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Change Management	
CM-4	NT	Timeliness of Change Management Notices		
Definition		<p>This report measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.</p> <p>Findings from this simplified V&E consists of a review of CLEC performance. This regional measure is made for the last 2 months (June 2008 to May 2009). Measure includes a review of time and a staff member on CLEC notices.</p>	<p>This report measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. The Accessible Letter communicates the CR being corrected in either a <u>major or minor release</u>. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.</p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
Exclusions		<ul style="list-style-type: none"> Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes (for example: a patch to fix a software problem) Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP) 	<p>Exclusions</p> <ul style="list-style-type: none"> Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes (for example: a patch to fix a software problem) Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP) 	
Business Rules		<p>The interval begins on the notification date and ends on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. A revised notification would be required and the interval would restart. Based on release constraints for defects/expedites, notification may be less than the agreed upon interval in the CCP for new features.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Timeliness of Change Management Notices = $(a - b) \times 100$</p> <p>a = Total number of Change Management Notifications sent within required timeframes</p> <p>b = Total number of Change Management Notifications sent</p>		
Report Structure	<ul style="list-style-type: none"> • BellSouth Aggregate • Geographic Scope Region 		
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation ————— SQM</p> <p>Analog/Benchmark</p> <p>Notices</p> <p>98% on time</p>		
SEEM Measure	<p>SEEM ————— Tier I ————— Tier II</p> <p>Yes.....X</p>	<p>sure</p> <p>SEEM Tier I Tier II</p> <p>Yes.....X.....X</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Change Management	
CM-3	DF	Timeliness of Documentation Associated with Change		
Definition		<p>This report measures whether CLECs received requirements or business rule documentation on time to prepare for BellSouth interface system changes so CLEC interfaces are not impaired by change. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.</p> <p>Rationale:</p> <ul style="list-style-type: none"> Eliminate service quality pain. Axcel's strategy provides a high level of performance. The percentage of time a million sum on time reaches mark of 98% was exceeded (100%) for June 2008 to May 2009. Measure a process that does not have direct, significant impact on CLECs and end users. 		Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions		<ul style="list-style-type: none"> Documentation for release dates that slip less than 30 days for a change mandated by regulatory or legal entities (Federal Communications Commission [FCC], a state commission authority, or state and federal courts) or CLEC request Type 6 Change Requests (Defects-Expedites), as defined by the Change Control Process 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>The interval begins on the date the business rule documentation is released and ends on the software release date. When project events occur (scope changes, analysis information, etc.), the software release date may change. Revisions to documentation could be required and the interval would restart.</p> <p>Documentation standards and timeliness can be found in the Change Control Process, on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec-cep-live/index.htm)</p>		
Calculation	<p>Timeliness of Documentation Associated with Change = $\frac{(a-b) \times 100}{100}$</p> <ul style="list-style-type: none"> • a — Change Management documentation sent within required timeframes after notices • b — Total number of Change Management documentation sent 		
Report Structure	<ul style="list-style-type: none"> • BellSouth Aggregate • Geographic Scope Region 		
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation SQM Analog/Benchmark</p> <ul style="list-style-type: none"> • Documentation 98% on Time 		
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>Yes X</p>	<p>sure</p> <p>SEEM Tier I Tier II</p> <p>Yes X X</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Change Management	
CAI-5	ION	Notification of CLEC Interface Outages		
Definition		<p>This report measures the time it takes BellSouth to notify the CLECs of an interface outage as defined by the Change Control Process (CCP) documentation:</p> <ul style="list-style-type: none"> • The report will be used to simplify plan. • AT&T's current system provides a high level of performance. • Performance for past 12 months from June 2008 to May 2009 has been 99.99% against a benchmark of 99.99% SLA rate. • Report will show outage availability rate and the availability. 		Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions		None		
Business Rules		<p><u>BellSouth has 15 minutes to notify the CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur:</u></p> <ol style="list-style-type: none"> <u>1. BellSouth can duplicate a CLEC reported system error.</u> <u>2. BellSouth finds an error message within the error log that identically matches a CLEC reported system outage.</u> <u>3. When three or more CLECs report the identical type of outage.</u> <u>4. BellSouth detects a problem due to the loss of functionality for users of a system.</u> <p><u>The 15 minute interval begins once a CLEC reported outage or a BellSouth detected outage has lasted for 20 minutes and has been verified. If the outage is not verified within 20 minutes, the interval begins at the point of verification.</u></p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	Notification of CLEC Interface Outages		
Report Structure	<ul style="list-style-type: none"> • CLEC Aggregate • Geographic Scope Region 		
SQM Disaggregation- Analog/Benchmark	<p>SQM Level of Disaggregation _____ SQM Analog/Benchmark</p> <ul style="list-style-type: none"> • By interface type for all interfaces accessed by CLECs 97% <= 15 Minutes <p>Interface _____ Applicable to</p> <p>EDI _____ CLEC</p> <p>CSOTS _____ CLEC</p> <p>LENS _____ CLEC</p> <p>TAG _____ CLEC</p> <p>ECTA _____ CLEC</p> <p>TAFI _____ CLEC BellSouth</p>	<p>SQM Disaggregation - Analog Benchmark</p> <p>SQM Level of Disaggregation</p> <p>SQM Analog Benchmark</p> <ul style="list-style-type: none"> • By interface type for all interfaces accessed by CLECs 97% <= 15 Minutes <p>Interface Applicable to</p> <p>EDI CLEC</p> <p>CSOTS CLEC</p> <p>LENS CLEC</p> <p>TAG CLEC</p> <p>ECTA CLEC</p> <p>TAFI CLEC BellSouth</p> <p>LASR..... CLEC</p> <p>XML..... CLEC</p> <p>ACTS..... CLEC</p> <p>EBFA CPSS... CLEC</p> <p>LEX..... CLEC</p> <p>Verigate..... CLEC</p>	
SEEM Measure	<p>SEEM _____ Tier I _____ Tier II</p> <p>No.....</p>	<p>SEEM Measure</p> <p>SEEM Tier I Tier II</p> <p>No/Yes..... X.....</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM#	Measure Category Code	Title of the Measure	Change Management	
CM-6	SEC	Percentage of Software Errors Corrected in "X" Business Days		
Definition		This report measures the percentage of all outstanding met or overdue software errors, due and to be corrected by BellSouth-AT&T in "X" business days within the report period. Average of all categories.		Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions			<u>Exclusions</u> Software corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs • Rejected or reclassified software errors (BellSouth must report the number of rejected or reclassified software errors disputed by the CLECs)	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>For corrected software errors, the interval begins when a Software Error is validated per the Change Control Process (CCP) and ends when the error is corrected and the notice is posted as implemented to the change control website. Additionally, all outstanding software errors not corrected within their standard interval will be included in the total measurement base. Currently "X" business days is defined in the CCP as 10 = Severity 2, 30 = Severity 3, and 45 = Severity 4. The current standard intervals for this measure will be consistent with the intervals set in the CCP if agreed to by the CLEC or ordered by the Commission. The standard intervals established in the CCP currently are: Severity 2=10 days, Severity 3 = 30 days, and Severity 4= 45 days. A copy of the most current CCP can be found on the Interconnection AT&T website (http://www.interconnection.bellsouth.com/markets-lee/ccp_live_index.htm) The monthly report should include all defects, due and overdue, to be corrected within the report period. Software defects are defined as Type 6 Change Requests in the Change Control Process.</p> <p>Verbiage updated for clarity and to best reflect actual coding of current reports</p> <p>Remove reference to specific URL to allow flexibility in the event of future URL changes</p>		
Calculation	<p>Percentage of Software Errors Corrected in "X" Business Days = (a / b) X 100</p> <p>a = Total number of software errors corrected in "X" business days, as defined for each severity level (Severity 2, Severity 3, and Severity 4)</p> <p>b = Total number of Severity 2, Severity 3, and Severity 4 software errors corrected <u>and software errors overdue past their standard interval</u></p> <p>Verbiage updated for clarity and to best reflect actual coding of current reports</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Report Structure	<ul style="list-style-type: none"> • Severity 2 – 10 Business Days • Severity 3 – 30 Business Days • Severity 4 – 45 Business Days • AT&T Aggregate • Geographic Scope -Region <p>Verbiage updated for clarity and to best reflect actual coding of current reports</p>		
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation SQM/SEEM Analog/Benchmark</p> <ul style="list-style-type: none"> • Errors Severity 2 Errors Corrected 95% within Interval • Severity 3 Errors Corrected.....95% within Interval • Severity 4 Errors Corrected.....95% within Interval <p>Verbiage updated for clarity and to best reflect actual coding of current reports</p>		
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>YesX</p> <p>Remove all references to SEEM to reflect AT&T's proposal to transition to commercial remedy plan</p> <p>Eliminate Tier 2 remedies.</p> <p>Local markets irreversibly open.</p> <p>Thirteen years since passage of '96 Telecom Act.</p> <p>Tier 2 incentive to prevent backsliding no longer needed</p>	<p>sure</p> <p>SEEM Tier I Tier II</p> <p>Yes X.....X</p> <p><u>Discuss the EDR report and AT&T's claim that they have 5 days to evaluate whether the patch placed in production is actually working.</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Change Management	
CM-7	CRA	Change Requests Accepted or Rejected within 10 Business Days		
Definition		<p>This report measures the percentage of change requests, other than Type 1 or Type 6 Change Requests, submitted by CLECs that are accepted or rejected by BellSouth in 10 business days within the report period.</p> <p>Eliminate metric to simplify plan.</p> <p>AT&T consistently provides a high level of performance.</p> <p>Low volume - only 3 change requests submitted over past 12 months, June 2008 to May 2009 with performance at 100% for meeting the 95% benchmark.</p> <p>Measures a process that does not have any direct, significant impact on CLECs and end users.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions		Change requests canceled or withdrawn before a response from BellSouth is due		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>The acceptance-rejection interval begins when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found on the Interconnection website: http://www.interconnection.bellsouth.com/markets/lec/cep_live/index.html) The interval ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions that have been responded to within the reporting period.</p>		
Calculation	<p>Percentage of Change Requests Accepted or Rejected within 10 Business Days $=(a / b) \times 100$</p> <p>_____ a = Total number of change request responses due in the reporting period that were accepted or rejected within 10 business days</p> <p>_____ b = Total number of change requests due in the reporting period</p>		
Report Structure	<p>_____ BellSouth Aggregate</p> <p>_____ Geographic Scope</p> <p>_____ Region</p>		
SQM Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation</p> <p>_____ SQM/SEEM Analog/Benchmark</p> <p>_____ Requests Accepted/Rejected</p> <p>_____ 95% within Interval</p>	<p>SQM Level of Disaggregation</p> <p>SQM/SEEM Analog/Benchmark</p> <p>95/98% within Interval</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SEEM Measure	SEEM - Tier I ----- Tier II Yes -----X	sure SEEM Tier I Tier II Yes <u>X</u> -----X <u>AT&T is not using full capacity.</u>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Change Management	
CM-8	CRR	Percent Change Requests Rejected		
		<p>This report measures the percentage of change requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected within the report period.</p> <p>Rationale:</p> <ul style="list-style-type: none"> Financial metric to simplify plan Total volume of change requests for all disaggregation in this diagnostic measure is low (10) for last 12 months (June 2008 to May 2009). Measures a process that does not have direct, significant impact on CLECs and end users 		Area to be subject of PSC Workshop and ultimately staff recommendation.
		Change requests canceled or withdrawn before a response from BellSouth AT&T is due		
Business Rules		<p>This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejection per the Change Control Process, a copy of which can be found on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/cep_live_index.html) (http://wholesale.att.com/reference_library/processes/cep_live-cep_doe_bcep.html). These reasons are: cost, technical feasibility, and industry direction. This metric includes all change requests not subject to the above exclusions that have been responded to within the reporting period.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Percent Change Requests Rejected — $(a - b) \times 100$</p> <p>_____ a = Total number of change requests rejected in the reporting period</p> <p>_____ b = Total number of change requests responded to within the reporting period</p>		
Report Structure	<p>_____ BellSouth - AT&T Aggregate</p> <p>_____ Geographic Scope</p>		
SQM Level of Disaggregation - Analog/Benchmark	<p>SQM Level of Disaggregation</p> <p>_____ SQM Analog/Benchmark</p> <p>_____ Reason — Cost</p> <p>_____ Diagnostic</p> <p>_____ Reason — Technical Feasibility</p> <p>_____ Diagnostic</p> <p>_____ Reason — Industry Direction</p> <p>_____ Diagnostic</p> <p>_____ Reason — Out of Scope (OOS)</p> <p>_____ Diagnostic</p>		
SEEM Measure	<p>SEEM Tier I _____ Tier II</p> <p>No _____</p>	<p>sure</p> <p>SEEM Tier I _____ Tier II</p> <p><u>No</u> YES X _____</p> <p><u>Suggest report include number of defects introduced by minor release as a separate disaggregation.</u></p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Change Management	
CM-9	NDPR	Number of Defects in Production Releases (Type 6 CR)		
		<p>This report measures the number of defects in production releases. This measure will be presented as the number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work-around, the number of Type 6 Severity 3 Defects, and the number of Type 6 Severity 4 Defects resulting within a three-week period from a production release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, Severity 3, and Severity 4 Defects can be found in the Change Control Process document.</p> <p>Eliminate metric to simplify plan.</p> <p>AT&T recommends removal of this measure as it is no longer needed based on low volume (0 in last 12-month report (June 2008 through May 2009)), and level of performance.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
		None		
Business Rules		<p>This metric measures the number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work-around, the number of Type 6 Severity 3 Defects, and the number of Type 6 Severity 4 Defects resulting within a three-week period from a production release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, 3, and 4 Defects can be found in the Change Control Process, which can be found on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html)</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, the number of Type 6 Severity 3 Defects, and the number of Type 6 Severity 4 Defects.		
Report Structure	<ul style="list-style-type: none"> • Production Releases • Number of Type 6 Severity 1 Defects • Number of Type 6 Severity 2 Defects without a mechanized work around • Number of Type 6 Severity 3 Defects • Number of Type 6 Severity 4 Defects • Geographic Scope Region 		
SQM Level of Disaggregation Analog/Benchmark	<p>SQM Level of Disaggregation SQM</p> <p>Analog/Benchmark</p> <ul style="list-style-type: none"> • Number of Type 6 Severity 1 Defects 0 Defects • Number of Type 6 Severity 2 Defects without a mechanized work around 0 Defects • Number of Type 6 Severity 3 Defects 0 Defects • Number of Type 6 Severity 4 Defects.....0 Defects 		
SEEM Measure	<p>SEEM Tier I Tier II</p> <p>No</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Change Management	
CM-10	SV	Software Validation		
		<p>This report measures software validation test results for production releases of BellSouth local interfaces.</p> <p>Rationale:</p> <p>Eliminate metrics to simplify plan.</p> <p>AT&T consistently provides a high level of service performance.</p> <p>Performance for past 12 months (June 2008 through May 2009) exceeded software validation requirements benchmark of 95% for all production releases.</p>		Area to be subject of PSC Workshop and ultimately staff recommendation.
		None		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>BellSouth maintains a test deck of transactions that are used to validate that functionality in software production releases work as designed. Each transaction in the test deck is assigned a weight factor based on the weights assigned to the metrics. Within the software validation metric, weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE) and then equally distributed across transactions within the specific type.</p> <p>BellSouth AT&T will begin to execute the software validation test deck within one (1) business day following a production release. Test deck transactions will be executed using production release software in the CAVE environment. Within seven (7) business days following completion of the production release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.</p> <p>A transaction is considered failed if the request cannot be submitted or processed, or results in incorrect or improperly formatted data.</p> <p>The test deck scenario weight table can be found in the Change Control Process, a copy of which can be found on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/cep_live/index.html) (http://wholesale.att.com/reference_library/processes/cep_live/cep_doc_bcep.html).</p>		
Calculation	<p>This software validation metric is defined as the ratio of the sum of the weights of failed transactions using production release software in CAVE to the sum of the weights of all transactions in the test deck:</p> <ul style="list-style-type: none"> • Numerator = Sum of weights of failed transactions • Denominator = Sum of weights of all transactions in the test deck 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Report Structure	<ul style="list-style-type: none"> ● ———— BellSouth Aggregate ● ———— Geographic Scope Region 		
SQM Level of Disaggregation - Analog/Benchmark	<p>SQM Level of Disaggregation</p> <p>———— SQM Analog/Benchmark</p> <ul style="list-style-type: none"> ● ———— Failed Transactions ———— <= 5% 		
SEEM Measure	<p>SEEM Tier I ———— Tier II</p> <p>No</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Change Management	
CM-11	SCRF	Percentage of Software Change Requests Implemented within 60 Weeks of Prioritization		
Definition		<p>This report measures whether BellSouth provides CLECs timely implementation of prioritized software change requests.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Eliminate inefficiencies to simplify plan. • AT&T consistently provides a high level of service performance. • Performance for past 12 months met the benchmark for all change requests. • Low volume for with no misses for Type 4 or 5 change requests submitted from June 2008 through May 2009. • Measures a process that does not have direct significant impact on CLECs and end users. 		Area to be subject of PSC Workshop and ultimately staff recommendation.
Exclusions		<ul style="list-style-type: none"> • Software change requests implemented later than 60 weeks with the consent of the CLECs • Software change requests where BellSouth has regulatory authority to exceed the interval 	<p>Exclusions</p> <ul style="list-style-type: none"> • Software change requests implemented later than 60 weeks with the consent of the CLECs • Software change requests where BellSouth has regulatory authority to exceed the interval 	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>The interval for each software change request begins when it has first been prioritized as described in the Change Control Process and ends when the software change request has been implemented by BellSouth and made available to the CLECs. However, the 60-week clock may be restarted if a reprioritization is requested solely at the discretion of the CLECs and a CR is moved to a later release.</p>		
Calculation	<p>Percentage of Type 5 CLEC-Initiated Software Change Requests Implemented on Time = (a - b) X 100</p> <ul style="list-style-type: none"> • a = Total number of prioritized Type 5 software change requests implemented each month that are less than or equal to 60 weeks of age from the date of their first prioritization plus all other prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization • b = All entries in "a" above plus all Type 5 software change requests prioritized more than 60 weeks before the end of the monthly reporting period <p>Percentage of Type 4 BellSouth-Initiated Software Change Requests Implemented on Time = (c - d) X 100</p> <ul style="list-style-type: none"> • c = Total number of prioritized Type 4 software change requests implemented each month that are less than or equal to 60 weeks of age from the date of the release prioritization list plus all other Type 4 prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization • d = All entries in "c" above plus all Type 4 software change requests prioritized more than 60 weeks before the end of the monthly reporting period 		
Report Structure	<ul style="list-style-type: none"> • BellSouth Aggregate • Type 4 Requests Implemented • Type 5 Requests Implemented • Percent implemented within 16, 32, 48 and 60 weeks • Geographic Scope Region 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
SQM Disaggregation Analog/Benchmark	SQM Level of Disaggregation SQM/SEEM Analog/Benchmark <ul style="list-style-type: none"> • Type 1 Requests Implemented 95% within Interval • Type 5 Requests Implemented 95% within Interval 		
SEEM Measure	SEEM Tier I Tier II Yes X	SEEM Measure SEEM Tier I Tier II Yes <u>X</u> X	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	<h2>Change Management</h2>	
CM-11A	PCRI	Average Time to Implement Process Change Requests		
SQM Section	AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale		
Definition	<p>This report measures the average time BellSouth takes to implement prioritized Process Change Requests.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Ultimate metric to simplify plan. • AT&T has not reported any activity data for this measure for the past 12 months (June 2008 to May 2009). 	<p>Definition</p> <p>This report measures the average time BellSouth takes to implement prioritized Process Change Requests, and the time Change Requests are in the <u>Accepted Held</u> status.</p>	Area to be subject of PSC Workshop and ultimately staff recommendation.	
Exclusions	<ul style="list-style-type: none"> • Process Change Requests implemented later than 60 days with the consent of the CLECs • Process Change Requests where BellSouth has regulatory authority to exceed the interval 	<p>Exclusions</p> <ul style="list-style-type: none"> • Process Change Requests implemented later than 60 days with the consent of the CLECs • Process Change Requests where BellSouth has regulatory authority to exceed the interval 		
Business Rules	<p>The interval for each Process Change Request begins when it has been prioritized as described in the Change Control Process and ends when the Process Change Request has been implemented by BellSouth and made available to the CLECs.</p>			

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Calculation	<p>Average Implementation Time for the Type 5 CLEC-Initiated Process Change Requests – (a – b)</p> <ul style="list-style-type: none"> • — a – Sum of implementation times for the prioritized Type 5 Process Change Requests implemented within the data month • — b – Total number of prioritized Type 5 Process Change Requests implemented within the data month <p>Average Implementation Time for the Type 4 BellSouth Initiated Process Change Requests – (c – d)</p> <ul style="list-style-type: none"> • — c – Sum of implementation times for the prioritized Type 4 Process Change Requests implemented within the data month • — d – Total number of prioritized Type 4 Process Change Requests implemented within the data month 		
Report Structure	<ul style="list-style-type: none"> • — BellSouth Aggregate • — Type 4 Process Change Requests implemented • — Type 5 Process Change Requests implemented • — Geographic Scope Region 		
SEEM Measure	<p>SEEM Tier I — Tier II</p> <p>No</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix A		<p>x</p> <p><u>A mathematical operator representing multiplication</u></p> <p><u>LCSC/LSC</u></p> <p>Local Carrier Service Center - The BellSouth AT&T center which is dedicated to handling CLEC LSRs and preordering transactions, along with associated expedite requests and escalations.</p> <p><u>PMAP</u></p> <p>Performance Measurement Analysis Platform—Provides delivery of performance reports via the web and facilitates analysis of the summary level data.</p> <p><u>SEEM</u></p> <p>Self Effectuating Enforcement Mechanism—A tiered remedy structure in which payments are made either to the CLEC and/or state regulatory agency, depending on the type and level of parity/benchmark miss that occurs</p> <p><u>WebTAXI</u></p> <p><u>Web-based application for viewing and tracking claims and for creating CABS billing adjustments</u></p>	<p>A</p> <p>ACD</p> <p>Automatic Call Distributor - A service that provides status monitoring of agents in a call center and routes high volume incoming telephone calls to available agents while collecting management information on both callers and attendants.</p> <p><u>ACT Automated Completion Transmittal System</u></p> <p>B</p> <p>BOCRIS</p> <p>Business Office Customer Record Information System (Front-end to the CRIS database) – System used to maintain customer account information which includes, but is not limited to bills, payment history, and memo notations made during customer contact.</p> <p><u>BOG Bulk Order Generator</u></p>	<p>Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Rationale:</p> <ul style="list-style-type: none"> • Clarify the mathematical operation representing multiplication. • The status and functions performed by the BellSouth Local carrier Service Center (LSC) are now performed by the AT&T Local Service Center (LSC). • Remove references, where appropriate to specific systems throughout document to provide possible system flexibility. • Remove all references to SFEM to reflect AT&T's proposal to transition to commercial remedy plan. • Added definition of Web FAX system to Appendix A: Glossary of Acronyms and Terms. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure

Appendix

<p>Appendix B</p>	<p><u>BellSouth AT&T Audit and Dispute Resolution Policy</u></p> <p><u>Audit</u></p> <p>BellSouth AT&T currently provides CLECs with certain audit rights as a part of their individual interconnection agreements. If requested ordered by a the Public Service Commission, BellSouth AT&T will agree to undergo an SQM audit. Unless otherwise agreed between AT&T and the Public Service Commission, the audit should be conducted by an independent third party auditor. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. Audit will be conducted under the following specifications:</p> <ol style="list-style-type: none"> 1. The cost of one audit per version of the SEEM plan shall be borne by BellSouth AT&T. 2. Should an independent third party auditor be required, it shall be selected by BellSouth AT&T and the PSC. 3. BellSouth AT&T and the PSC shall jointly determine the scope of the audit. 4. The PSC may request input regarding selection of the auditor and audit scope from interested parties. <p>These audits are intended to provide the basis for the PSCs and CLECs to determine that the SQM and PMAP the AT&T performance measurement data report process produce accurate data that reflects each State's Order for performance measurements.</p> <p>Rationale:</p> <p>Added language to ensure cooperative decision.</p> <p>Added to limit AT&T exposure to additional expense for multiple audits</p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
--------------------------	---	---

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p><u>Dispute Resolution</u></p> <p><u>Notwithstanding any other provision of the Interconnection Agreement between AT&T and each CLEC, if a dispute arises regarding AT&T's performance or obligations pursuant to this Plan, AT&T and the CLEC shall negotiate in good faith for a period of thirty (30) days to resolve the dispute. If at the conclusion of the 30 day period, AT&T and the CLEC are unable to reach a resolution, then the dispute shall be resolved by the Commission.</u></p> <p>Rationale:</p> <p>Inserted verbiage from SEEM Plan into SQM to provide for Dispute</p> <p>Resolution description</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure

Appendix

Appendix C		<p>OSS-1 [ARI]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)</p> <p>Table 1: Legacy System Access Times For RNS</p> <table border="1"> <thead> <tr> <th>System</th> <th>ContractData</th> <th>Avg. Sec.</th> <th># of Calls</th> </tr> </thead> <tbody> <tr> <td>RSAG</td> <td>RSAG-TN</td> <td>Address x</td> <td>x</td> </tr> <tr> <td>RSAG</td> <td>RSAG-ADDR</td> <td>Address x</td> <td>x</td> </tr> <tr> <td>ATLAS</td> <td>ATLAS-TN</td> <td>TN x</td> <td>x</td> </tr> <tr> <td>DSAP</td> <td>DSAP-DDI</td> <td>Schedule x</td> <td>x</td> </tr> <tr> <td>CRIS</td> <td>CRSACCTS</td> <td>CSR x</td> <td>x</td> </tr> <tr> <td>OASIS</td> <td>OASISBIG</td> <td>Feature/Service.....</td> <td>x x</td> </tr> </tbody> </table> <p>Table 2: Legacy System Access Times For ROS</p> <table border="1"> <thead> <tr> <th>System</th> <th>ContractData</th> <th>Avg. sec.</th> <th># of Calls</th> </tr> </thead> <tbody> <tr> <td>RSAG</td> <td>RSAG-TN</td> <td>Address x</td> <td>x</td> </tr> <tr> <td>RSAG</td> <td>RSAG-ADDR</td> <td>Address x</td> <td>x</td> </tr> <tr> <td>ATLAS</td> <td>ATLAS-TN</td> <td>TN x</td> <td>x</td> </tr> <tr> <td>DSAP</td> <td>DSAP-DDI</td> <td>Schedule x</td> <td>x</td> </tr> <tr> <td>CRIS</td> <td>CRSOCSR</td> <td>CSR x</td> <td>x</td> </tr> <tr> <td>OASIS</td> <td>OASISBIG</td> <td>Feature/Service.....</td> <td>x x</td> </tr> </tbody> </table>	System	ContractData	Avg. Sec.	# of Calls	RSAG	RSAG-TN	Address x	x	RSAG	RSAG-ADDR	Address x	x	ATLAS	ATLAS-TN	TN x	x	DSAP	DSAP-DDI	Schedule x	x	CRIS	CRSACCTS	CSR x	x	OASIS	OASISBIG	Feature/Service.....	x x	System	ContractData	Avg. sec.	# of Calls	RSAG	RSAG-TN	Address x	x	RSAG	RSAG-ADDR	Address x	x	ATLAS	ATLAS-TN	TN x	x	DSAP	DSAP-DDI	Schedule x	x	CRIS	CRSOCSR	CSR x	x	OASIS	OASISBIG	Feature/Service.....	x x	<p>Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.</p>
System	ContractData	Avg. Sec.	# of Calls																																																								
RSAG	RSAG-TN	Address x	x																																																								
RSAG	RSAG-ADDR	Address x	x																																																								
ATLAS	ATLAS-TN	TN x	x																																																								
DSAP	DSAP-DDI	Schedule x	x																																																								
CRIS	CRSACCTS	CSR x	x																																																								
OASIS	OASISBIG	Feature/Service.....	x x																																																								
System	ContractData	Avg. sec.	# of Calls																																																								
RSAG	RSAG-TN	Address x	x																																																								
RSAG	RSAG-ADDR	Address x	x																																																								
ATLAS	ATLAS-TN	TN x	x																																																								
DSAP	DSAP-DDI	Schedule x	x																																																								
CRIS	CRSOCSR	CSR x	x																																																								
OASIS	OASISBIG	Feature/Service.....	x x																																																								

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments																																																																				
		<p>Table 3: Legacy System Access Times For LENS/Enhanced Verigate (Pre-Order only)</p> <table border="1"> <thead> <tr> <th>System</th> <th>ContractData</th> <th>Avg. sec.</th> <th># of Calls</th> </tr> </thead> <tbody> <tr> <td>RSAG</td> <td>RSAG-TN Address</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>RSAG</td> <td>RSAG-ADDR Address</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>ATLAS</td> <td>ATLAS-TN TN</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>DSAP</td> <td>DSAP-DDI Schedule</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>CRIS</td> <td>CRSECSRL CSR</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>COFFI</td> <td>COFFI USOC Feature Service</td> <td>.....x</td> <td>x x</td> </tr> <tr> <td>P/SIMS</td> <td>PSIMS/ORB Feature/Service</td> <td>.....x</td> <td>x x</td> </tr> </tbody> </table> <p>Table 4: Legacy System Access Times For TAG/XML</p> <table border="1"> <thead> <tr> <th>System</th> <th>ContractData</th> <th>Avg. sec.</th> <th># of Calls</th> </tr> </thead> <tbody> <tr> <td>RSAG</td> <td>RSAG-TN Address</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>RSAG</td> <td>RSAG-ADDR Address</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>ATLAS</td> <td>ATLAS-TN TN</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>ATLAS</td> <td>ATLAS-MLH TN</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>ATLAS</td> <td>ATLAS-DID TN</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>DSAP</td> <td>DSAP-DDI Schedule</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>CRIS</td> <td>CRSECSRL CSR</td> <td>.....x</td> <td>..... x</td> </tr> <tr> <td>P/SIMS</td> <td>PSIM/ORB Feature/Service</td> <td>.....x</td> <td>x x</td> </tr> </tbody> </table> <p><u>If LENS works on the TAG/XML code why are the table 3 and 4 different?</u></p> <p><u>AT&T's post July release needs to be described for Table 4.</u></p>	System	ContractData	Avg. sec.	# of Calls	RSAG	RSAG-TN Addressx x	RSAG	RSAG-ADDR Addressx x	ATLAS	ATLAS-TN TNx x	DSAP	DSAP-DDI Schedulex x	CRIS	CRSECSRL CSRx x	COFFI	COFFI USOC Feature Servicex	x x	P/SIMS	PSIMS/ORB Feature/Servicex	x x	System	ContractData	Avg. sec.	# of Calls	RSAG	RSAG-TN Addressx x	RSAG	RSAG-ADDR Addressx x	ATLAS	ATLAS-TN TNx x	ATLAS	ATLAS-MLH TNx x	ATLAS	ATLAS-DID TNx x	DSAP	DSAP-DDI Schedulex x	CRIS	CRSECSRL CSRx x	P/SIMS	PSIM/ORB Feature/Servicex	x x	
System	ContractData	Avg. sec.	# of Calls																																																																				
RSAG	RSAG-TN Addressx x																																																																				
RSAG	RSAG-ADDR Addressx x																																																																				
ATLAS	ATLAS-TN TNx x																																																																				
DSAP	DSAP-DDI Schedulex x																																																																				
CRIS	CRSECSRL CSRx x																																																																				
COFFI	COFFI USOC Feature Servicex	x x																																																																				
P/SIMS	PSIMS/ORB Feature/Servicex	x x																																																																				
System	ContractData	Avg. sec.	# of Calls																																																																				
RSAG	RSAG-TN Addressx x																																																																				
RSAG	RSAG-ADDR Addressx x																																																																				
ATLAS	ATLAS-TN TNx x																																																																				
ATLAS	ATLAS-MLH TNx x																																																																				
ATLAS	ATLAS-DID TNx x																																																																				
DSAP	DSAP-DDI Schedulex x																																																																				
CRIS	CRSECSRL CSRx x																																																																				
P/SIMS	PSIM/ORB Feature/Servicex	x x																																																																				
	<p>OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)</p> <p>OSS Table 2: SQM Interface Availability for Maintenance &</p>	<p>OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)</p> <p>OSS Table 1: SQM Interface Availability for Pre-</p>																																																																					

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Repair</p> <p>OSS Interface Availability %</p> <p>BellSouth AT&T TAFI x</p> <p>CLEC TAFI x</p> <p>CLEC ECTA* x</p> <p>WHLS</p> <p>eRepair*.....x</p> <p>BellSouth-AT&T & CLEC</p> <p>CRIS x</p> <p>LMOS HOST x</p> <p>LNP Gateway x</p> <p>MARCH x</p> <p>OSPCM x</p> <p>PREDICTOR x</p> <p>SOCS x</p> <p><i>*Note: eRepair will be replacing ECTA. CLECs have until June 1, 2008 to transition to eRepair. From November of 2007 until May of 2008, at&t will report both interfaces. Beginning June 1, 2008, only eRepair will be reported.</i></p> <p>Rationale:</p> <ul style="list-style-type: none"> Update of expired note to reflect change of application to replace ECTA. <p>AT&T is in the process of implementing a 22 state ELECTRONIC BONDING TROUBLE ADMINISTRATION (EBTA) OSS that will take over the functionality of ECTA. Accessible Letters provided during this process will advise on current status. ECTA is expected to remain available until 1st Qtr. 2010. Future application of eRepair has not been determined.</p>	<p>Ordering Ordering</p> <p>OSS Interface Availability</p> <p>Application Applicable to % Availability</p> <p>EDI CLEC x</p> <p>LENS CLEC x</p> <p>LASR CLEC x</p> <p>WFM CLEC x</p> <p>OBF CLEC x</p> <p>Enhanced Verigate CLEC x</p> <p>LESOG CLEC x</p> <p>TAG/XML CLEC x</p> <p>LNP Gateway CLEC x</p> <p>COG CLEC x</p> <p>SGG CLEC x</p> <p><u>ACTS</u> <u>CLEC</u> <u>X</u></p> <p><u>NVAT</u> <u>CLEC</u> <u>X</u></p> <p><u>BOG</u> <u>CLEC</u> <u>X</u></p> <p>DOE CLEC/BellSouth x</p> <p>SONGS CLEC/BellSouth x</p> <p>ATLAS/COFFI CLEC/BellSouth x</p> <p>BOCRIS/CRIS CLEC/BellSouth x</p> <p>DSAP CLEC/BellSouth x</p> <p>RSAG CLEC/BellSouth x</p> <p>SOCS CLEC/BellSouth x</p> <p>LFACS CLEC/BellSouth x</p> <p>RNS BellSouth x</p> <p>ROS BellSouth x</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments																										
		<p>OSS Table 2: <u>SQM Interface Availability for Maintenance & Repair</u></p> <table border="0"> <thead> <tr> <th>OSS Interface</th> <th>% Availability</th> </tr> </thead> <tbody> <tr> <td>BellSouth TAFI</td> <td>x</td> </tr> <tr> <td>CLEC TAFI</td> <td>x</td> </tr> <tr> <td>CLEC ECTA*</td> <td>x</td> </tr> <tr> <td>WHH S-eRepair</td> <td>x</td> </tr> <tr> <td colspan="2">BellSouth & CLEC</td> </tr> <tr> <td>CRIS</td> <td>x</td> </tr> <tr> <td>LMOS HOST</td> <td>x</td> </tr> <tr> <td>LNP Gateway</td> <td>x</td> </tr> <tr> <td>MARCH</td> <td>x</td> </tr> <tr> <td>OSPCM</td> <td>x</td> </tr> <tr> <td>PREDICTOR</td> <td>x</td> </tr> <tr> <td>SOCS</td> <td>x</td> </tr> </tbody> </table> <p>*Note: eRepair will be replacing ECTA. CLECs have until June 1, 2008 to transition to eRepair. From November of 2007 until May of 2008, at&t will report both interfaces. Beginning June 1, 2008, only eRepair will be reported. <u>I believe eRepair was withdrawn, how does EBTA, CPSS, fit into this chart?</u></p>	OSS Interface	% Availability	BellSouth TAFI	x	CLEC TAFI	x	CLEC ECTA*	x	WHH S-eRepair	x	BellSouth & CLEC		CRIS	x	LMOS HOST	x	LNP Gateway	x	MARCH	x	OSPCM	x	PREDICTOR	x	SOCS	x	
OSS Interface	% Availability																												
BellSouth TAFI	x																												
CLEC TAFI	x																												
CLEC ECTA*	x																												
WHH S-eRepair	x																												
BellSouth & CLEC																													
CRIS	x																												
LMOS HOST	x																												
LNP Gateway	x																												
MARCH	x																												
OSPCM	x																												
PREDICTOR	x																												
SOCS	x																												

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure

Appendix

Appendix D	<p>BellSouth's AT&T's Policy on Reposting of Performance Data and Recalculation of SEEM Payments Raw (Supporting) Data Files (SDF)</p> <p>BellSouth AT&T will be required to repost make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:</p> <p>---</p> <ul style="list-style-type: none"> 4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of $\geq \leq .5$ in the zZ-Score at the sub-metric level. <p>---</p> <ul style="list-style-type: none"> When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for no more than three months that the applicable data was reposted. For a three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of May, BellSouth will correct for May and the three preceding months - April, March and February. Any adjustments for underpayment of tier 4 and tier 5 calculated remedies resulting from the application of this policy
-------------------	--

<p>BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments</p> <p>6. SQM Performance data will be reposted for a maximum of three months in arrears.</p> <p>from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, BellSouth will correct the data beginning with the month of detection (May) and the three months preceding - April, March and February.</p> <p>7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be</p>

<p>Parties Agree. Noted below is the Plan language to which the parties agree.</p> <p>Appendix D: BellSouth's AT&T's Policy on Reposting of Performance Data and Recalculation of SEEM Payments Raw (Supporting) Data Files (SDF)</p> <p>BellSouth AT&T will be required to repost make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:</p> <ol style="list-style-type: none"> Those SQM measures included in a state's specific SQM plan with corresponding sub-metrics to reposting. A notice will be placed on the PMAP AT&T performance measurement website advising CLECs when reposted data is available. SQM Performance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting. SQM Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an
--

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>... BellSouth's</p> <ul style="list-style-type: none"> • ... <p>Rationale</p> <ul style="list-style-type: none"> • Remove all references to SFPM to reflect AT&T's proposal to transition to a remedial remedy plan • Corrected spelling of Z-Score and corrected typing error for symbol • Remove reference to PMAP to allow flexibility in the event of platform changes in the future <p>Determination of when Reposting Policy Applies</p> <p>As part of the Change Notification Process, BellSouth AT&T performs an analysis of impacts that are proposed to be made to Performance Measurement Application Platform (PMAP) the AT&T performance measurement reporting process code. These impacts are used to identify changes to its reported SQM results.</p> <p>To determine this impact, BellSouth AT&T performs a query of the data warehouse to identify those records that would be impacted by the proposed change. Once the number of records are identified, the measurement is recalculated to determine the impact. This is the general framework for analysis - the specific steps used to evaluate the impact will vary with the issue being analyzed. However, the following example may assist in understanding.</p> <p>Assume that service orders were erroneously being included in a particular product disaggregation for Percent Missed Installation Appointments. They should have been in another product</p>	<p>discovered for the data month of May, BellSouth will correct data for May and the three preceding months - April, March and February.</p>	<p>"out of parity" condition will be available for reposting whenever there is a >=2% decline in BellSouth's AT&T's performance at the sub-metric level.</p> <p>4. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation in performance as shown by an adverse change of $\geq \leq .5$ in the z-Score at the sub-metric level.</p> <p>5. Any data recalculations that reflect an improvement in BellSouth's AT&T's performance will be reposted at BellSouth's AT&T's discretion. However, statewide performance must improve by at least 2% for benchmark measures and the z-score must improve by at least 0.5 for retail analogues at the sub-metric level to qualify for reposting.</p> <p>6. SQM Performance data will be reposted for a maximum of three months in arrears from implementation of the change of programming request requirement (RQ) which corrects a detected error, date of detection. RQs shall not be unreasonably delayed after the date the error is detected. As an example, should an error be discovered during the analysis of the May data month performance that triggers a reposting, and this error triggers a reposting but the RQ correcting the error is implemented in the calendar month of July with the June data month performance reports, BellSouth AT&T will correct the data beginning with the month of the RQ implementation (July) detection (May), which would be for the June data month performance reports, and will repost the data month performance reports for the three months preceding data month performance reports - May, April, and March and February.</p> <ul style="list-style-type: none"> • ... When updated SQM performance data has been reported or when a payment error in dARS has been discovered, BellSouth will recalculate applicable SFPM payment where technically feasible for a maximum of three months in arrears from date of detection. Recalculated

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>disaggregation. Further, assume that the number of records erroneously included is 110 records out of a total of 86,000. In this example, the numerator and denominator would both be reduced by 110 records and the zscore <u>Z-Score</u> would be recalculated. If the amount of the change was sufficient to meet criteria 2, 4 or 5 above, the Reposting policy will be invoked.</p> <p>Rationale: Administrative change to correct spelling of Z-Score.</p>		<p>...the CLEC's specific data. If the CLEC's specific data is not accurate, the CLEC is responsible for identifying the data and requesting BellSouthAT&T to repost the data. Any failure to repost inaccurate data should be brought to the attention of the Commission for resolution if it is estimated that the thresholds described in items 3, 4, or 5 have been met at the CLEC-specific level.</p> <p>Determination of when Reposting Policy Applies</p> <p>As part of the Change Notification Process, BellSouthAT&T performs an analysis of impacts that are proposed to be made to Performance Measurement Application Platform (PMAP) the AT&T performance measurement reporting process code. These impacts are used to identify changes to its reported SQM results.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
			<p>To determine this impact, BellSouth AT&T performs a query of the data warehouse to identify those records that would be impacted by the proposed change. Once the number of records are identified, the measurement is recalculated to determine the impact. This is the general framework for analysis - the specific steps used to evaluate the impact will vary with the issue being analyzed. However, the following example may assist in understanding.</p> <p>Assume that service orders were erroneously being included in a particular product disaggregation for Percent Missed Installation Appointments. They should have been in another product disaggregation. Further, assume that the number of records erroneously included is 110 records out of a total of 86,000. In this example, the numerator and denominator would both be reduced by 110 records and the zscore <u>Z-Score</u> would be recalculated. If the amount of the change was sufficient to meet criteria 2, 4 or 5 above, the Reposting policy will be invoked.</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Appendix	
SQM Section		AT&T's Proposed Changes/Rationale	CLEC's proposed Changes/Rationale	
Appendix E		<p>II. Raw (Supporting) Data – General</p> <p>Raw (Supporting) Data Files (SDF)</p> <p>Raw (Supporting) Data Files for CLEC data will be published on the PMAP AT&T performance measurement website each month. For the measures calculated in PMAPthe AT&T performance measurement report process, these files will contain the CLEC initiated records required to replicate the report or reports as applicable. These files will be present for those reports generated from data processed by PMAPthe AT&T performance measurement report process. Some reports are calculated outside of PMAPthe AT&T performance measurement report process and the results are simply uploaded for posting. These reports will have less detailed Supporting Data Files.</p> <p>B. Raw Data (SDF) Records - Ordering</p> <p>For Ordering Metrics:</p> <p>Supporting data is provided for the following metrics:</p> <ul style="list-style-type: none"> • O-2 [AKC]: Acknowledgement Message Completeness • O-8 [RI]: Reject Interval • O-9 [FOCT]: Firm Order Confirmation Timeliness • O-11 [FOCC]: Firm Order Confirmation and Reject Response 	<p>Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Completeness</p> <p>As a general rule, all versions of transactions are provided in the Supporting Data Files. Records for Service Requests that are related to a project, cancelled prior to being FOC'd or Clarified Rejected, and versions of records not used in the reports will be placed into the Other Supporting Data File -- Ordering.</p> <p>C. Raw Data (SDF) Records -- Provisioning</p> <p>For Provisioning Metrics:</p> <p>Supporting data is provided for the following metrics:</p> <ul style="list-style-type: none"> • P-1 [HOI]: Held Order Interval • P-2A [PJ48]: Percentage of Orders Given Jeopardy Notices >= 48 Hours • P-2B [PJ]: Percentage of Orders Given Jeopardy Notices • P-3 [MIA]: Percent Missed Installation Appointments • P-4 [OCI]: Order Completion Interval • P-5 [CNI]: Average Completion Notice Interval • P-7 [CCI]: Coordinated Customer Conversions Interval -- Hot Cut Duration • P-7A [CCT]: Coordinated Customer Conversions -- Hot Cut Timeliness Percent within Interval • P-7B [CPI]: Coordinated Customer Conversions -- Average Recovery Time • P-7C [CPI]: Hot Cut Conversions -- Percent Provisioning Troubles Received within 5 Days of a Completed Service Order • P-7D [NCDD]: Non-Coordinated Customer Conversions -- Percent Completed and Notified on Due Date • P-9 [PPT]: Percent Provisioning Troubles within "X" Days of Service Order Completion • P-11 [SOA]: Service Order Accuracy • P-13B [LOOS]: LNP-Percent Out of Service < 60 Minutes • P-13C [LAT]: LNP-Percentage of Time BellSouth/AT&T 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Applies the 10-Digit Trigger Prior to the LNP Order Due Date</p> <ul style="list-style-type: none"> P-13D [LDT]: LNP-Disconnect Timeliness (Non-Trigger) <p>All service order activity that results from Service Requests generated by the CLEC and used in the calculation of a report will be furnished as a part of the Supporting Data Files. Records for D, R, E, and M order types, as well as cancelled orders will be placed in the Other Supporting Data File – Provisioning.</p> <p>Rationale:</p> <ul style="list-style-type: none"> Remove reference to PMAP to allow flexibility in the event of platform changes in the future Rationale for removal of metrics O-2, O-11, P-7B, P-7E, and P-13C is provided on individual metric entry. 		
	<p>D. Raw Data (SDF) Records – M&R</p> <p>For Maintenance and Repair (M&R) Metrics:</p> <p>Supporting data is provided for the following metrics:</p> <p>.....M&R-1 [MRA]: Percent Missed Repair Appointments</p> <p>.....M&R-2 [CTRR]: Customer Trouble Report Rate <u>Net of Provisioning, Trouble and Repeat Reports</u></p> <p>.....M&R-3 [MAD]: Maintenance Average Duration</p> <p>.....M&R-4 [PRT]: Percent Repeat Customer Troubles within 30 Days</p> <p>.....M&R-5 [OOS]: Out of Service (OOS) > 24 Hours</p> <p>All customer submitted reports used in the calculation of a metric will be furnished as a part of the Supporting Data Files. Reports that are excluded, canceled, or in error, will be placed in the Other Supporting Data File - M&R. Specifically not included are BellSouth AT&T generated tickets such as employee, auto-detect, and tickets associated with service order activity dispatches.</p> <p>Rationale:</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Remove MVR 2.5 (TR) metrics for rationale:</p>		
	<p>E. Raw Data (SDF) Records – Other</p> <p>For Other Metrics:</p> <p>Supporting data is provided for the following metrics:</p> <p>.....B-1 [BIA]: Invoice Accuracy</p> <p>2 [BIT]: Mean Time to Deliver Invoices</p> <p>.....B-5 [BUOT]: Usage Data Delivery Timeliness</p> <p>.....B-10 [BEC]: Percent Billing Adjustment Requests (BAR) Responded to within 40 Business Days</p> <p>The Billing Supporting Data File used to create performance measurements for billing is provided for CLECs on the PMAP website. This SDF along with the reports resulting from billing supporting data can be used for replicating the measures. Any billing data used or not used in creating the billing measures is part of the CLEC's invoices sent to them on a monthly basis. Any charges or adjustments are part of their individual invoices, which identify the nature of the charges or adjustments, whether credits or debits.</p> <p>Database Update Information - None</p> <p>Trunk Group Performance – None</p> <p>Collocation – None:</p> <p>Supporting data is provided for the following metrics:</p> <p>1 [ART]: Collocation Average Response Time</p> <p>2 [AT]: Collocation Average Arrangement Time</p> <p>.....C-3 [MDD]: Collocation Percent of Due Dates Missed</p> <p>Change Management - None</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Rationale: Rationale for revised Billing metrics (V-1 and V-2) is provided on the individual metric cards. Remove reference to PMAF to allow flexibility in the event of platform changes in the future.</p>		
	<p>III. Supporting Data User Manual (SDUM) and Schema for Other Supporting Data Files (OSDF)</p> <p>The SDUM and Schema can be found at the AT&T performance measurement website: http://pmap.bellsouth.com in the Documentation/Exhibits folder.</p> <p>Rationale: Remove reference to PMAF to allow flexibility in the event of platform</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure
SQM Section	AT&T's Proposed Changes/Rationale	

Appendix

<p>Appendix F</p> <p>BellSouth PMAAP Data Notification Process</p> <p>1. On the first business day of the month preceding the data month for which BellSouth proposes to make any change to the method by which its performance data is calculated, BellSouth will provide written notice of any such AT&T's Proposed Changes/Rationale (hereinafter referred to as "Proposed Data Changes"). This notice will identify the affected measure(s), describe the proposed change, provide a reason for the proposed change, and outline its impact. At the same time BellSouth will provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following data month (hereinafter referred to as "Preliminary Data Changes").</p> <p>2. No later than four business days after the written notice referenced above has been provided, BellSouth will conduct an industry conference call at which time the affected parties as well as the Commission can ask questions about either the Proposed Data Changes or the Preliminary Data Changes. The call will be conducted from 2:00 to 5:00 p.m. (Eastern Time).</p> <p>3. No later than ten (10) business days after the industry conference call, affected parties must file written comments with the Commission to the extent they have objections or concerns about the Proposed Data Changes.</p>			<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
---	--	--	---

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>4. The Proposed Data Changes set forth in the written notice referenced above would be presumptively valid and deemed approved by the Commission effective thirty (30) calendar days after that notice unless the Commission Staff directs BellSouth not to go forward with the changes.</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Eliminate administrative requirement to simplify plan. • No objections or concerns have been filed by any party with the Commission for any changes notified by AT&T. • AT&T is held accountable for maintaining code that is compliant with the Exclusions, Business Rules, Calculation, Report Structure and SQM Disaggregation as noted in the SQM plan for each metric. • All changes to the code that supports the SQM plan is subject to audit. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure
Appendix GF		<p>SQM Equity Determination</p> <p>C. Equity Determination</p> <p><u>Exception 2:</u> Measures OSS-1 (ARI), O-12 [OAAT], B-1 [BIA], B-2 [BIT], and M & R-6 [MAAT] also use the "Direct Comparison" criteria.</p> <p>Rationale:</p> <p>Refer to Billing and Average Answer Time measures for removal rationale for these verbiage changes</p>

Appendix

Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure
Appendix	H	Special Access Measurements

Appendix

TABLE OF CONTENTS	<p>REPORTING</p> <p>DIMENSIONS.....94</p> <p>ORDERING</p> <p>SA-1—FOC RECEIPT.....95</p> <p>SA-2—FOC RECEIPT PAST DUE.....97</p> <p>SA-3—OFFERED VERSUS REQUESTED DUE DATE.....98</p> <p>PROVISIONING</p> <p>SA-4—ON TIME PERFORMANCE TO FOC DUE DATE.....99</p> <p>SA-5—DAYS LATE.....100</p> <p>SA-6—AVERAGE INTERVALS—REQUESTED—OFFERED—INSTALLATION.....102</p> <p>SA-7—PAST DUE CIRCUITS..... 103</p> <p>SA-8—NEW INSTALLATION TROUBLE REPORT</p>	<p>Area to be subject of PSC Workshop and ultimately staff recommendation.</p>
--------------------------	---	---

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>RATE..... 105</p> <p>MAINTENANCE AND REPAIR</p> <p>SA-9 FAILURE</p> <p>RATE.....106</p> <p>SA-10 MEAN TIME TO RESTORE.....107</p> <p>SA-11 REPEAT TROUBLE REPORT</p> <p>RATE.....109</p> <p>GLOSSARY.....110</p> <p>• SYMBOLS USED IN CALCULATIONS.....111</p> <p>Rationale:</p> <ul style="list-style-type: none"> • Eliminate Appendix II (Special Access Measurements) to simplify plan. • Special Access metrics covered by FCC requirement. • AT&T's voluntary commitments set forth in Appendix F of the FCC's Memorandum Opinion and Order in the AT&T BellSouth Merger (WC Docket No. 05-74). • FCC "BOC Nondominance Order" established obligation to track and report to the FCC compliance with special access metrics on a quarterly basis (WC Docket 06-120 Section 272 (d) Sunset of the BOC Separate Affiliation and Related Requirements). • AT&T FCC report provides monthly and Year-to-date performance by state by DSO, DSI and DS3 services for the following measures: <ul style="list-style-type: none"> ○ FOCT: Firm Order Confirmation (FOC) Timeliness ○ PLAM: Percent Installation Appointments Met 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>NIIR: New Installation Trouble Report Rate</p> <p>UIIR: Failure Rate / Trouble Report Rate</p> <p>MAI: Average Repair Interval / Mean Time to Restore</p>		
<p>Reporting Dimensions</p>	<p>CLEC or IXC Carrier specific total, with the following reporting dimensions for all measurements:</p> <ul style="list-style-type: none"> —Special Access disaggregated by bandwidth —Sub Totaled by State —Totaled by BellSouth <p>Comparison reports are required for:</p> <ul style="list-style-type: none"> —CLEC-IXC Carrier Aggregate —BellSouth Long Distance (BSLD) Aggregate <p>Special Access is any exchange access service that provides a transmission path between two or more points, either directly, or through a central office, where bridging or multiplexing functions are performed, not utilizing BellSouth end office switches.</p> <p>Special Access Services include dedicated and shared facilities configured to support analog voice grade service, metallic and/or telegraph service, audio, video, digital data service (DDS), digital transport and high capacity service (DS1, DS3 and OCn), collocation transport, links for SS7 signaling and database queries, SONET access including OC-192 based dedicated SONET ring access, and broadband services.</p> <p>Exclusions: Transmission path requests pursuant to an Interconnection Agreement for Unbundled Network Elements (UNE) are excluded from these Performance Measures.</p> <p>Reporting Period: The reporting period is the calendar month, unless otherwise noted, with all averages or percentages displayed to one decimal point.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	<h1>Appendix</h1>	
Appendix	H	ORDERING – Measurement: SA-1 – FOC Receipt		
Description		The Firm Order Confirmation (FOC) is the BellSouth response to an Access Service Request (ASR), whether an initial or supplement ASR, that provides the CLEC or IXC Carrier with the specific Due Date on which the requested circuit or circuits will be installed. BellSouth will conduct a minimum of an electronic facilities check to ensure due dates delivered in FOCs can be relied upon. The performance standard for FOCs received within the standard interval is expressed as a percentage of the total FOCs received during the reporting period. A diagnostic distribution is required along with a count of ASRs withdrawn at BellSouth's request due to a lack of BellSouth facilities or otherwise.		
Calculation Methodology		<p>Percent Meeting Performance Standard:</p> <p>$\frac{\text{Count FOCs received where (FOC Receipt Date - ASR Received Date) } \leq \text{ Performance Standard}}{\text{Total FOCs received during reporting period}} \times 100$</p> <p>FOC Receipt Distribution:</p> <p>-(FOC Receipt Date - ASR Received Date), for each FOC received during reporting period, distributed by:</p> <p>-0 days, >0 <= 1 day, >1 day <= 2 days, >2 days <= 5 days, >5 days <= 10 days, >10 days</p> <p>ASRs Withdrawn at BellSouth Request due to a lack of BellSouth Facilities or Otherwise:</p> <p>-Count of ASRs, which have not yet received a FOC. Withdrawn at BellSouth's Request, during the current reporting period, due to a</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	lack of BellSouth facilities or otherwise		
Business Rules	<p>1. Counts are based on each instance of a FOC received from BellSouth. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.</p> <p>2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.</p> <p>3. Projects are included.</p>		
Exclusions	<ul style="list-style-type: none"> – Unsolicited FOCs – Disconnect ASRs – Cancelled ASRs – Record ASRs 	<p>Exclusions</p> <ul style="list-style-type: none"> – Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs 	
Levels of Disaggregation	<ul style="list-style-type: none"> – DS0 – DS1 – DS3 (Non-Optical) – DS3 (Optical OCn) 		
Performance Standard	<ul style="list-style-type: none"> – Percent FOCs Received within Standard – DS0 >= 98.0% within 2 business days – DS1 >= 98.0% within 2 business days – DS3 >= 98.0% within 5 business days 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	OCn ICB (Individual Case Basis) FOC Receipt Distribution Diagnostic ASRs Withdrawn at BellSouth's Request Due to a Lack of BellSouth Facilities or Otherwise Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	<h1>Appendix</h1>
Appendix	H	ORDERING Measurement: SA-2-FOC Receipt Past Due	
Description	<p>The FOC Receipt Past Due measure tracks all ASR requests that have not received an FOC from BellSouth within the expected FOC receipt interval, as of the last day of the reporting period and do not have an open, or outstanding, Query/Reject. This measure gauges the magnitude of late FOCs. A distribution of these late FOCs, along with a report of those late FOCs that do have an open Query/Reject, is required for diagnostic purposes.</p>		
Calculation Methodology	<p>Percent FOC Receipt Past Due Without Open Query/Reject: $\frac{\text{Sum of ASRs without a FOC Received, and a Query/Reject is not open, where (End of Reporting Period - ASR Received Date) > Expected FOC Receipt Interval}}{\text{Total number of ASRs received during reporting period}} \times 100$</p> <p>FOC Receipt Past Due Without Open Query/Reject Distribution: $\frac{\text{[(End of Reporting Period - ASR Received date) - (Expected FOC Receipt Interval)]}}{\text{for ASRs without a FOC received and a Query/Reject is not open with the CLEC or IXC Carrier, distributed by:}}$</p> <p>0 days, >0 <= 5 days, >5 days <= 10 days, >10 days <= 20 days, >20 days <= 30 days, >30 days <= 40 days, >40 days</p> <p>Percent FOC Receipt Past Due With Open Query/Reject: Sum of ASRs without a FOC Received, and a Query/Reject is open, where (End of Reporting Period - ASR Sent Date > Expected FOC</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>Receipt Interval) = Total number of ASRs received during reporting period x 100</p>		
Business Rules	<p>1. All counts are based on the latest ASR request sent to BellSouth. Where one or more subsequent ASRs have been sent, only the latest ASR would be recorded as Past Due if no FOC had yet been returned.</p> <p>2. The Expected FOC Receipt Interval, used in the calculations, will be the interval identified in the Performance Standards for the FOC Receipt measure.</p> <p>3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.</p> <p>4. Projects are included.</p>		
Exclusions	<ul style="list-style-type: none"> —Unsolicited FOCs —Disconnect ASRs —Cancelled ASRs —Record ASRs 	<p>Exclusions</p> <ul style="list-style-type: none"> —Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs 	
Levels of Disaggregation	<ul style="list-style-type: none"> —DS0 —DS1 —DS3 (Non Optical) —DS3 (Optical OCn) 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Performance Standard	Percent FOC Receipt Past Due Without Open Query Reject 2.0% FOC Receipt Past Due FOC Receipt Past Due Without Open Query Reject Distribution Diagnostic Percent FOC Receipt Past Due With Open Query Reject Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix	H	ORDERING Measurement: SA 3 Offered Versus Requested Due Date		
Description		The Offered Versus Desired Due Date measure reflects the degree to which BellSouth is committing to install service on the CLEC or IXC Carrier Desired Due Date (CDDD), when a Due Date desired is equal to or greater than the BellSouth stated interval. A distribution of the delta, the difference between the CDDD and the Offered Date, for these FOCs is required for diagnostic purposes.		
Calculation Methodology		<p>Percent Offered with CLEC or IXC Carrier Requested Due Date:</p> $\frac{\text{Count of ASRs where (FOC Due Date = CDDD)}}{\text{Total number of ASRs where (CDDD - ASR Received Date) = > BellSouth Stated Interval}} \times 100$ <p>Offered versus Requested Interval Delta Distribution:</p> $\frac{\text{((Offered Due Date - CDDD) where (CDDD - ASR Received Date) = > BellSouth Stated Interval)}}{\text{for each FOC received during the reporting period, distributed by:}}$ <p>0 days, > 0 <= 5 days, > 5 days <= 10 days, > 10 days <= 20 days, > 20 days <= 30 days, > 30 days <= 40 days, > 40 days</p>		
Business Rules		<p>1. Counts are based on each instance of a FOC received from BellSouth. If one or more Supplement ASRs are issued to correct or change a request, each corresponding FOC, which is received during the reporting period, is counted and measured.</p> <p>2. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	weekend, or holiday, will be calculated with an end date of the last previous business day. 3. Projects are included		
Exclusions	— Unsolicited FOCs — Disconnect ASRs — Cancelled ASRs — Record ASRs	Exclusions — Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs	
Levels of Disaggregation	— DS0 — DS1 — DS3 (Non-Optical) — DS3 (Optical OCn)		
Performance Standard	— Percent Offered with CDDD (where CDDD => BellSouth Stated Interval) — 100% — Offered versus Requested Interval Delta— Distribution..... Diagnostic — BellSouth Stated Intervals: To be determined by BellSouth		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure		
Appendix	H	PROVISIONING Measurement: SA-4 On-Time Performance To FOC Due Date	Appendix	
Description		On Time Performance To FOC Due Date measures the percentage of circuits that are completed on the FOC Due Date, as recorded from the FOC received in response to the last ASR received. Customer Not Ready (CNR) situations are defined as Customer Not Ready (SR), No Access (SA), Customer Requests a Later Date (SL), and Customer Other (SO) which may result in an installation delay. The On Time Performance To FOC Due Date is calculated both with CNR consideration, i.e. measuring the percentage of time the service is installed on the FOC due date while counting CNR coded orders as an appointment met, and without CNR consideration.		
Calculation Methodology		<p>Percent on Time Performance to FOC Due Date—With CNR Consideration:</p> $\frac{\text{Count of Circuits Completed on or before BellSouth Committed Due Date} + \text{Count of Circuits Completed after FOC Due Date with a verifiable CNR code}}{\text{Count of Circuits Completed in Reporting Period}} \times 100$ <p>Percent on Time Performance to FOC Due Date—Without CNR Consideration:</p> $\frac{\text{Count of Circuits Completed on or before BellSouth Committed Due Date}}{\text{Count of Circuits Completed in Reporting Period}} \times 100$ <p>Note: The denominator for both calculations is the total count of circuits completed during the reporting period, including all circuits, with and without a CNR code.</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>1. Measures are based on the last ASR received and the associated FOC Due Date received from BellSouth.</p> <p>2. Selection is based on circuits completed by BellSouth during the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders; however, the service order is not considered completed for measurement purposes until all circuits are completed.</p> <p>3. BellSouth Completion Date is the date upon which BellSouth completes installation of the circuit, as noted on a completion notice to the CLEC or IXC Carrier.</p> <p>4. Projects are included</p> <p>5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation.</p>		
Exclusions	<ul style="list-style-type: none"> — Unsolicited FOCs — Disconnect ASRs — Cancelled ASRs — Record ASRs 	<p>Exclusions</p> <ul style="list-style-type: none"> — Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs 	
Levels of Disaggregation	<ul style="list-style-type: none"> — DS0 — DS1 — DS3 (Non Optical) — DS3 (Optical OCn) 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Performance Standard	Percent On Time to FOC Due Date - With CNR Consideration -> 98.0 % On Time Percent On Time to FOC Due Date - Without CNR Consideration -Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

Appendix

SQM #	Measure Category Code	Title of the Measure
Appendix	H	PROVISIONING Measurement: SA 5 Days Late
Description	Days Late captures the magnitude of the delay, both in average and distribution, for those circuits not completed on the FOC Due Date, and the delay was not a result of a verifiable CNR situation. A breakdown of delay days caused by a lack of BellSouth facilities is required for diagnostic purposes.	
Calculation Methodology	<p>Average Days Late:</p> $\frac{\sum [\text{Circuit Completion Date} - \text{BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code)}]}{(\text{Count of Circuits Completed Beyond BellSouth Committed Due Date without a CNR code})}$ <p>Days Late Distribution:</p> $\frac{\sum [\text{Circuit Completion Date} - \text{BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code)}]}{(\text{Count of Circuits Completed Beyond BellSouth Committed Due Date without a CNR code})}$ distributed by: <p><= 1 day, 0 < 3 days, >1 <= 5 days, >5 <= 10 days, >10 <= 20 days, >20 <= 30 days, >30 <= 40 days, >40 days</p> <p>Average Days Late Due to a Lack of BellSouth Facilities:</p> $\frac{\sum [\text{Circuit Completion Date} - \text{BellSouth Committed Due Date (for all Circuits Completed Beyond BellSouth Committed Due Date without a CNR code and due to a Lack of BellSouth Facilities)}]}{(\text{Count of Circuits Completed Beyond BellSouth Committed Due Date without a CNR code and due to a Lack of BellSouth Facilities})}$	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Business Rules	<p>1. Measures are based on the latest valid ASR received and the associated FOC Due Date received from the BellSouth.</p> <p>2. Selection is based on circuits completed by BellSouth during the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders; however, the service order is not considered completed for measurement purposes until all circuits are completed.</p> <p>3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.</p> <p>4. Projects are included</p> <p>5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation</p>		
Exclusions	<ul style="list-style-type: none"> —Unsolicited FOCs —Disconnect ASRs —Cancelled ASRs Record ASRs 	<p>Exclusions</p> <ul style="list-style-type: none"> —Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs 	
Levels of Disaggregation	<ul style="list-style-type: none"> —DS0 —DS1 —DS3 (Non-Optical) —DS3 (Optical OCn) 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Performance Standard	—Average Days Late < 3.0 Days —Days Late Distribution Diagnostic Average Days Late Due to a Lack of BellSouth Facilities..... Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix	H	PROVISIONING Measurement: SA-6 Average Intervals- Requested- Offered- Installation		
Description		This measure captures three important aspects of the provisioning process and displays them in relation to each other. The Average CLEC or IXC Carrier Requested Interval, the Average BellSouth Offered Interval, and the Average Installation Interval, provide a comprehensive view of provisioning, with the ultimate goal of having these three intervals equivalent.		
Calculation Methodology		 Average CLEC or IXC Carrier Requested Interval: $\frac{\text{Sum (CDDD - ASR Received Date)}}{\text{Total Circuits Completed during reporting period}}$ Average BellSouth Offered Interval: $\frac{\text{Sum (FOC Due Date - ASR Received Date)}}{\text{Total Circuits Completed during reporting period}}$ Average Installation Interval: $\frac{\text{Sum (BellSouth Completion Date - ASR Received Date)}}{\text{Total Circuits Completed during reporting period}}$ 		
Business Rules		 1. Measures are based on the last ASR received and the associated FOC Due Date received from BellSouth. 2. Selection is based on circuits completed by BellSouth the reporting period. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders; however, the ASR is not considered completed for measurement purposes until all circuits are completed. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	<p>3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.</p> <p>4. Projects are included</p> <p>5. The Average Installation Interval includes all completions.</p>		
Exclusions	<ul style="list-style-type: none"> —Unsolicited FOCs —Disconnect ASRs —Cancelled ASRs —Record ASRs 	<p>Exclusions</p> <ul style="list-style-type: none"> —Unsolicited FOCs Disconnect ASRs Cancelled ASRs Record ASRs 	
Levels of Disaggregation	<ul style="list-style-type: none"> —DS0 —DS1 —DS3 (Non-Optical) —DS3 (Optical-OCn) 		
Performance Standard	<ul style="list-style-type: none"> —Average Requested Interval —Diagnostic —Average Offered Interval —Diagnostic Average Installation Interval —Diagnostic 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix	H	<p style="text-align: center;">PROVISIONING</p> <p>Measurement: SA 7 Past Due Circuits</p>		
Description		<p>The Past Due Circuits measure provides a snapshot view of circuits not completed as of the end of the reporting period. The count is taken from those circuits that have received a FOC Due Date but the date has passed. Results are separated into those held for BellSouth reasons and those held for CLEC or IXC Carrier reasons (CNRs), with a breakdown, for diagnostic purposes, of Past Due Circuits due to a lack of BellSouth facilities. A diagnostic measure, Percent Cancellations After FOC Due Date, is included to show a percent of all cancellations processed during the reporting period where the cancellation took place after the FOC Due Date had passed</p>		
Calculation Methodology		<p>Percent Past Due Circuits:</p> <p>$\frac{\text{((Count of all circuits not completed at the end of the reporting period } > 5 \text{ days beyond the FOC Due Date, grouped separately for Total BellSouth Reasons, Lack of BellSouth Facility Reasons, and Total CLEC/Carrier Reasons) + (Total uncompleted circuits past FOC Due Date, for all missed reasons, at the end of the reporting period))}}{\text{Total uncompleted circuits past FOC Due Date, for all missed reasons, at the end of the reporting period}} \times 100$</p> <p>Past Due Circuits Distribution:</p> <p>Count of all circuits past the FOC Due Date that have not been reported as completed (Calculated as last day of reporting period - FOC Due Date) Distributed by:</p> <p><= 1 day, >1 <= 5 days, 0 days <= 5 days, >5 <= 10 days, >10 <= 20 days, >20 <= 30 days, >30 <= 40 days, >40 days</p> <p>Percent Cancellations after FOC Due Date:</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	 <p>Count (All circuits cancelled during reporting period, that were Past Due at the end of the previous reporting period, where (Date Cancelled > FOC Due Date) - (Total circuits Past Due at the end of the previous reporting period)) x 100</p> 		
Business Rules	 <p>1. Calculation of Past Due Circuits is based on the most recent ASR and associated FOC Due Date.</p> <p>2. An ASR may provision more than one circuit and BellSouth may break the ASR into separate internal orders; however, the service order is not considered completed for measurement purposes until all segments are completed.</p> <p>3. Days shown are business days, Monday to Friday, excluding National Holidays. Activity starting on a weekend, or holiday, will reflect a start date of the next business day, and activity ending on a weekend, or holiday, will be calculated with an end date of the last previous business day.</p> <p>4. Projects are included</p> <p>5. A Customer Not Ready (CNR) is defined as a verifiable situation beyond the control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready. BellSouth must ensure that established procedures are followed to notify the CLEC or IXC Carrier of a CNR situation and allow a reasonable period of time for the CLEC or IXC Carrier to correct the situation</p> 		
Exclusions	 <p>Unsolicited FOCs</p> <p>Disconnect ASRs</p> <p>Record ASRs</p> 	<p>Exclusions</p> <p>Unsolicited FOCs</p> <p>Disconnect ASRs</p> <p>Cancelled ASRs</p> <p>Record ASRs</p>	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Levels of Disaggregation	DSO DS1 DS3 (Non Optical) DS3 (Optical OCn)		
Performance Standard	Percent Past Due Circuits—Total BellSouth Reasons ————— < 3.0 % > 5 days beyond FOC Due Date Percent Past Due Circuits—Due to Lack of BellSouth Facilities ————— Diagnostic Percent Past Due Circuits—Total CLEC Reasons ————— Diagnostic Past Due Circuits Distribution ————— Diagnostic Percent Cancellation After FOC Due Date ————— Diagnostic		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQ M#	Measure Category Code	Title of the Measure	Appendix	
Appendix x	H	<p>PROVISIONING</p> <p>Measurement: SA-8 New Installation Trouble Report Rate</p>		
Description		New Installation Trouble Report Rate measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation.		
Calculation Methodology		<p>Trouble Report Rate within 30 Calendar Days of Installation:</p> <p>$\frac{\text{Count (trouble reports within 30 Calendar Days of Installation)}}{\text{Total Number of Circuits Installed in the Report Period}} \times 100$</p>		
Business Rules		<p>1. BellSouth Completion Date is the date upon which BellSouth completes installation of the circuit, as noted on a completion advice to the CLEC or IXC Carrier.</p> <p>2. The calculation for the following 30 calendar days is based on the creation date of the trouble ticket.</p>		
Exclusions		<p>Trouble tickets that are canceled at the CLEC's or IXC Carrier's request</p> <p>CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles</p> <p>BellSouth trouble reports associated with administrative service</p> <p>Tickets used to track referrals of misdirected calls</p> <p>CLEC or IXC Carrier requests for informational tickets</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Levels of Disaggregation	<ul style="list-style-type: none"> -DS0 -DS1 -DS3 (Non-Optical) -DS3 (Optical OCn) -Below DS3 (DS0 + DS1) -DS3 and Above (DS3 + OCn) 		
Performance Standard	<ul style="list-style-type: none"> -New Installation Trouble Report Rate <= 1.0 trouble reports per 100 circuits installed 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix	H	MAINTENANCE & REPAIR Measurement: SA 9 Failure Rate		
Description		Failure Rate measures the overall quality of the circuits being provided by the BellSouth and is calculated by dividing the number of troubles resolved during the reporting period by the total number of "in-service" circuits, at the end of the reporting period, and is then annualized.		
Calculation Methodology		Failure Rate Annualized: Failure Rate = (a / b)*100 — a = Count of trouble reports resolved during a report period — b = Number of circuits in service at the end of the report period Failure Rate Annualized = (c / d)*100 — c = Average count of trouble reports closed per month during the past 12 months — d = Average number of circuits in service per month for the past 12 months		
Business Rules		1. A trouble report/ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation. 2. A trouble is resolved when BellSouth issues notice to the CLEC or IXC Carrier that the circuit has been restored to operating parameters. 3. Where more than one trouble is resolved on a specific circuit during the reporting period, each trouble is counted in the Trouble Report Rate.		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Exclusions	<ul style="list-style-type: none"> —Trouble tickets that are canceled at the CLEC's or IXC Carrier's request —CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles —BellSouth trouble reports associated with administrative service —CLEC or IXC Carrier requests for informational tickets —Tickets used to track referrals of misdirected calls 		
Levels of Disaggregation	<ul style="list-style-type: none"> —Below DS3 (DS0 + DS1) —DS3 and Above (DS3 + OCn) —DS0 —DS1 —DS3 (Non Optical) —DS3 (Optical Oen) 		
Performance Standard	<ul style="list-style-type: none"> —Failure Rate Annualized —Below DS3 <= 10.0% —DS3 and Above <= 10.0% 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure	Appendix	
Appendix	H	<p>MAINTENANCE & REPAIR</p> <p>Measurement: SA-10—Mean Time to Restore</p>		
Description		<p>The Mean Time To Restore interval measures the promptness in restoring circuits to operating levels when a problem or trouble is received by BellSouth. Calculation is the elapsed time from the CLEC or IXC Carrier submission of a trouble report to BellSouth to the time BellSouth closes the trouble, less any Customer Hold Time or Delayed Maintenance Time due to valid customer, CLEC, or IXC Carrier caused delays. A breakdown of the percent of troubles outstanding greater than 24 hours, and the Mean Time to Restore of those troubles recorded as NTF / Test OK, is required for diagnostic purposes.</p>		
Calculation Methodology		<p>Mean Time To Restore:</p> <p>$\frac{\sum \{(\text{Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier} - \text{Date and Time of Trouble Ticket Received by BellSouth}) - (\text{Customer Hold Times})\}}{(\text{Count of Trouble Tickets Resolved in Reporting Period})}$</p> <p>% Out of Service Greater than 24 hrs:</p> <p>$\frac{[\text{Count of Troubles where (Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier} - \text{Date and Time of Trouble Ticket Received by BellSouth}) - (\text{Customer Hold Times}) is > 24 hrs]}{(\text{Count of Trouble Tickets Resolved in Reporting Period})} \times 100$</p> <p>Mean Time To Restore—NTF / Test OK:</p> <p>$\frac{\sum \{(\text{Date and Time of Trouble Ticket Resolution Closed to the CLEC or IXC Carrier as NTF / Test OK} - \text{Date and Time of Trouble Ticket Referred to BellSouth}) - (\text{Customer Hold Times})\}}{(\text{Count of Trouble Tickets Resolved in Reporting Period})}$</p>		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	(Count of Trouble Tickets Resolved in Reporting Period as NTF -Test OK)		
Business Rules	<p>1. A trouble report or trouble ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation.</p> <p>2. Elapsed time is measured on a 24 hour, seven day per week basis, without consideration of weekends or holidays.</p> <p>3. Multiple reports in a given period are included, unless the multiple reports for the same customer is categorized as "subsequent" (an additional report on an already open ticket).</p> <p>4. "Restore" means to return to the expected operating parameters for the service regardless of whether or not the service, at the time of trouble ticket creation, was operating in a degraded mode or was completely unusable. A trouble is "resolved" when BellSouth issues notice to the CLEC or IXC Carrier that the customer's service is restored to operating parameters.</p> <p>5. Customer Hold Time or Delayed Maintenance Time resulting from verifiable situations of no access to the end user's premises, or other CLEC or IXC Carrier caused delays, such as holding the ticket open for monitoring, is deducted from the total resolution interval.</p>		
Exclusions	<ul style="list-style-type: none"> -Trouble tickets that are canceled at the CLEC's or IXC Carrier's request -CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer caused troubles -BellSouth trouble reports associated with administrative service -CLEC or IXC Carrier requests for informational tickets -Trouble tickets created for tracking and/or monitoring circuits -Tickets used to track referrals of misdirected calls 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Levels of Disaggregation	<ul style="list-style-type: none"> Below DS3 (DS0 + DS1) DS3 and Above (DS3 + OCn) DS0 DS1 DS3 (Non-Optical) DS3 (Optical OCn) 		
Performance Standard	<ul style="list-style-type: none"> Mean Time to Restore Below DS3 <= 2.0 Hours DS3 and Above <= 1.0 Hour % Out of Service > 24 Hrs Diagnostic Mean Time to Restore - NTF - Test OK Diagnostic 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure		
Appendix	H	<p>MAINTENANCE & REPAIR</p> <p>Measurement: SA-11 Repeat Trouble Report Rate</p>	Appendix	
Description		The Repeat Trouble Report Rate measures the percent of maintenance troubles resolved during the current reporting period that had at least one prior trouble ticket any time in the preceding 30 calendar days from the creation date of the current trouble report.		
Calculation Methodology		<p>Repeat Trouble Report Rate:</p> <p>$\frac{\text{--}\{(\text{Count of Current Trouble Reports with a previous trouble reported on the same circuit, in the preceding 30 calendar days})\}}{\text{(Number of Reports in the Report Period)}} \times 100$</p>		
Business Rules		<ol style="list-style-type: none"> 1. A trouble report or trouble ticket is any record (whether paper or electronic) used by BellSouth for the purposes of tracking related action and disposition of a service repair or maintenance situation. 2. A trouble is resolved when BellSouth issues notice to the CLEC or IXC Carrier that the circuit has been restored to operating parameters. 3. If a trouble ticket was closed out previously with the disposition code classifying it as NTF/TOK, then the second trouble must be counted as a repeat trouble report if it is resolved to BellSouth reasons. 4. The trouble resolution need not be identical between the repeated reports for the incident to be counted as a repeated trouble. 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
Exclusions	<ul style="list-style-type: none"> —Trouble tickets that are canceled at the CLEC's or IXC Carrier's request —CLEC, IXC Carrier, CPE (Customer Premises Equipment), or other customer-caused troubles —BellSouth trouble reports associated with administrative service —Subsequent trouble reports—defined as those cases where a customer called to check on the status of an existing open trouble ticket 		
Levels of Disaggregation	<ul style="list-style-type: none"> —Below DS3 (DS0 + DS1) —DS3 and Above (DS3 + OCn) —DS0 —DS1 —DS3 (Non-Optical) —DS3 (Optical OCn) 		
Performance Standards	<ul style="list-style-type: none"> —Repeat Trouble Report Rate Below DS3 <= 6.0% —DS3 and Above <= 3.0% 		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

SQM #	Measure Category Code	Title of the Measure
Appendix	H	GLOSSARY

Appendix

GLOSSARY		Parties agree to update to incorporate all areas of agreement between the parties as well as any changes to the plan ordered by the Commission.
Term	Definition	
Access Service Request (ASR)	A request to BellSouth to order new service, or request a change to existing service, which provides access to the local exchange company's network, under terms specified in the local exchange company's special or switched access tariffs.	
Business Days	Monday through Friday excluding holidays	
CDD	Customer Desired Due Date	
Customer Not Ready (CNR)	A verifiable situation beyond the normal control of BellSouth that prevents BellSouth from completing an order, including the following: CLEC or IXC Carrier is not ready; end user is not ready; connecting company, or CPE (Customer Premises Equipment) supplier, is not ready.	
(SA)	No access to subscriber premises	
(SR)	Customer Not Ready	
(SL)	Customer Requests Later Date	
(SO)	Customer Other	
Facility Check	A pre-provisioning check performed by BellSouth, in response to an access service request, to determine the availability of facilities and assign the installation date.	
First Order Confirmation (FOC)	The notice returned from BellSouth, in response to an Access Service Request from a CLEC or IXC Carrier that confirms receipt of the request, that a facility has been made, and that a service request has	

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	been created with an assigned due date.		
NTE	No Trouble Found		
Unsolicited FOC	An Unsolicited FOC is a supplemental FOC issued by BellSouth to change the due date or for other reasons, although no change to the ASR was requested by the CLEC or IXC Carrier.		
Project	Service requests that exceed the line size and/or level of complexity that would allow the use of standard ordering and provisioning processes.		
Query/Reject	BellSouth response to an ASR requesting clarification or correction to one or more fields on the ASR before an FOC can be issued.		
Repeat Trouble	Trouble that reoccurs on the same telephone number circuit ID within 30 calendar days		
Supplement ASR	A revised ASR that is sent to change due dates or alter the original ASR request. A "Version" indicator related to the original ASR number tracks each Supplement ASR.		
TOK	Test OK		

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
-------------	---	---	---------------------------------

Appendix

SQM #	Measure Category Code	Title of the Measure
Appendix	H	Symbols Used In Calculations
		<p>Σ A mathematical symbol representing the sum of a series of values following the symbol.</p> <p>- A mathematical operator representing subtraction.</p> <p>+</p> <p>A mathematical operator representing addition.</p> <p>/ A mathematical operator representing division.</p> <p>< A mathematical symbol that indicates the metric on the left of the symbol is less than the metric on the right.</p> <p>\leq A mathematical symbol that indicates the metric on the left of the symbol is less than or equal to the metric on the right.</p> <p>> A mathematical symbol that indicates the metric on the left of the symbol is greater than the metric on the right.</p> <p>\geq A mathematical symbol that indicates the metric on the left of the symbol is greater than or equal to the metric on the right.</p> <p>() Parentheses, used to group mathematical operations which are</p>

SQM Section	AT&T's Filed Proposed Changes/Rationale	CLEC's Filed proposed Changes/Rationale	Combined Collaborative Comments
	completed before operations outside the parentheses.		