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July 16, 2001

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.
Docket No. 01-00193

Dear David:

Please find enclosed the original and thirteen copies of the Testimony of Tad Jerret Sauder on behalf of Birch Telecom, Inc. in the above-captioned proceeding.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:
Henry Walker

HW/nl
Attachment
c: Parties

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BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

IN RE: DOCKET TO ESTABLISH GENERIC PERFORMANCE MEASURES, BENCHMARKS AND ENFORCEMENT MECHANISMS FOR BELLSOUTH TELECOMMUNICATIONS, INC.
DOCKET NO. 01-00193

TESTIMONY OF TAD JERRET SAUDER

OF BIRCH TELECOM, INC.

JULY 16, 2001

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: *Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

TESTIMONY OF TAD JERRET SAUDER

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My full name is Tad Jerret (T.J.) Sauder. My business address is 2020 Baltimore, Suite 300, Kansas City, Missouri 64108.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Birch Telecom, Inc., (Birch) as Manager, ILEC (Incumbent Local Exchange Carrier) Performance Data.

Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGER, ILEC PERFORMANCE DATA?

A. I am responsible for ensuring that the Performance Standards established for each ILEC vendor within Birch's operational areas allow Birch a meaningful opportunity to compete. Additionally, I audit ILEC reported Performance Measurement data for accuracy and completeness. I also participate in various collaborative processes, Public Service Commission hearings, and have first hand knowledge of Birch's operational experience with reported ILEC performance.

Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE?

A. I began my career in 1997, as a consultant for Andersen Consulting (now Accenture). In that capacity, I tested and implemented various

telecommunications Operational Support Systems (OSS), ranging from provisioning systems to billing systems. Since early 2000, I have worked for Birch Telecom in the sole capacity as Manager, ILEC Performance Data. I have appeared before state commissions to discuss operational issues and performance measurements, including the Texas Public Utility Commission (Projects 20400 and 22165), the Oklahoma Corporation Commission (Cause No. PUD 990000131), the Kansas Corporation Commission (Docket No. 97-SWBT-411-GIT), the North Carolina Utilities Commission (Docket No. P-100, Sub 133K) and participated in Performance Measurement collaboratives for many of the Ameritech states. Additionally, I have presented a workshop to the Kansas Corporation Commission staff on how Birch audits and tracks Southwestern Bell's performance measurements and remedy payments.

Q. PLEASE DESCRIBE THE BUSINESS OF BIRCH.

A. Founded in 1997 in Kansas City, Missouri, Birch Telecom is a competitive local exchange carrier (CLEC) serving small to mid-size businesses and residential customer in a variety of states. The company is one of the primary competitors to Southwestern Bell in the Midwest, offering a range of services including local and long distance telephone service, business telephone systems, Internet access, and web hosting and development, through local offices in 23 cities across Kansas, Missouri, Oklahoma and Texas. These services are offered through a combination of resold, leased, and owned network facilities. Birch reached the 250,000 access line milestone in February of 2001, with 70% being provisioned using the Unbundled Network Element Platform (UNE-P).

Birch has expanded its operations to the southeastern portion of the country and has entered into an interconnection agreement with BellSouth in all nine states in which BellSouth operates. Birch has chosen to use UNE-P to service customers in the BellSouth territory. Currently, Birch is operational in five of the nine BellSouth states, including Tennessee.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to present Birch's position on the current Tennessee performance measures plan, highlight a few of the significant measures important to Birch and demonstrate why these are vital in developing and maintaining competition. Finally, I will outline a few changes to the Tennessee measurements necessary to ensure parity treatment to CLECs.

Q. DOES BIRCH TELECOM SUPPORT THE CURRENT TENNESSEE PERFORMANCE MEASURES PLAN?

A. Yes. Birch Telecom of the South, Inc., a new entrant into North Carolina and the BellSouth territory, generally concurs with the current Tennessee plan and applauds the TRA for adopting portions of the Texas performance measurement plan. These measures are consistent with Birch's experience and success in Texas. In Texas, competition has been greatly facilitated by performance measures and benchmarks that accurately measure the key performance areas that indicate if real competition can exist.

Q. WHICH PERFORMANCE MEASURES DOES BIRCH WISH TO HIGHLIGHT?

A. Specifically, I will address FOC Timeliness (O-9), Reject Interval (O-8), Flow Through (O-1 & 2) and Average Completion Interval (P-17).

Q. CAN YOU EXPLAIN WHY THE BENCHMARK FOR FOC TIMELINESS IS SO IMPORTANT?

A. Yes.

The Firm Order Confirmation (FOC) Date is the date an ILEC assigns to complete a CLEC order. This response from BellSouth is very important to the CLECs as it is the date that will be communicated to the end user for the service to be installed. The CLEC's ability to get a FOC Date in a timely manner is paramount. Using an example of an end user wanting new telephony service, if the end user calls an ILEC's Retail operation, it is Birch's experience that an install or FOC Date will be communicated to the end user in a short time frame. If the same end user calls a Tennessee CLEC, the CLEC is limited by the standards of the FOC Timeliness Performance Measurement to communicate an install date. The 95% returned within 5 hours benchmark for electronically submitted orders minimizes the disadvantage CLECs experience when Local Service Requests (LSRs) are handled manually by BellSouth.

Q. HOW DOES THE CURRENT TENNESSEE FOC TIMELINESS DIFFER FROM THE CURRENT BELLSOUTH - GEORGIA AND SOUTHWESTERN BELL - TEXAS PERFORMANCE MEASURMENTS?

A. The current Tennessee measure is based on the Texas Business Rules Version 1.7 and measures the timely return of FOC regardless of how BellSouth handles the CLEC LSR. Both the Georgia and the latest Texas plans (Version 2.0) differentiate between how the ILEC processes the CLEC LSRs that are submitted electronically by the CLEC. Orders that are processed electronically (flow-through) by the ILEC and orders that are processed manually by the ILEC (due to limitations of ILEC's OSS to process the LSR electronically, are re-entered into ILEC's legacy provisioning systems by ILEC's service representatives) are disaggregated and have different benchmarks. The two different methods in which the ILEC handles CLEC LSRs are referred to as Fully Mechanized and Partially Mechanized. Birch supports a modification to disaggregate both Fully and Partially Mechanized orders and would support the adoption of a similar business rule in Tennessee.

Q. DO THE GEORGIA AND TEXAS FOC TIMELINESS MEASUREMENTS HAVE THE SAME BENCHMARKS?

A. No. The Georgia and Texas plans are very different in terms of benchmarks for the ILEC to achieve. Specifically, Texas requires Southwestern Bell to return 95% of Fully Mechanized FOCs within 1 hour and 95% of Partially Mechanized FOCs within 5 business hours. Georgia requires BellSouth to return 95% of Fully Mechanized FOCs within 3 hours and only 85% of Partially Mechanized FOCs

within 10 business hours. Birch's experience in Texas, as outlined later in my testimony, suggests that the Texas benchmarks are more appropriate in supporting competition and ensuring end users are able to receive parity service from CLECs.

Q. THE TEXAS MEASUREMENT, AS ADOPTED BY THE TRA, DIFFERENTIATES BETWEEN SIMPLE RESIDENCE AND BUSINESS VERSUS COMPLEX BUSINESS. HOW DOES THIS AFFECT YOUR PROPOSAL?

A. The Texas measurement, as adopted by the TRA, allows extra time to return a FOC for services considered complex. For simple POTS services (both resale and UNE-P), the benchmark is set at five business hours. The benchmark for complex services is set at 24 clock hours. Birch is not opposed to extended benchmarks for complex services that are partially mechanized. All services handled on a fully mechanized basis are processed electronically and do not require extended benchmarks based on the complexity of the order.

Q. CAN YOU EXPLAIN WHY THE BENCHMARK FOR THE REJECT INERVAL IS SO IMPORTANT?

A. Reject Interval is the amount of time that transpires between the CLEC submission of an LSR and BellSouth returning the LSR to the CLEC due to errors with the LSR. Because of the complexity of completing an LSR, the rapidly changing rules relating to UNE ordering, and the sometimes inadequate documentation provided by BellSouth, CLEC caused errors will happen. BellSouth's own data for the month of May 2001 shows that 23% of UNE-P

orders are rejected. Consequently, BellSouth's quick return of rejects for fast CLEC correction is critical in Tennessee. The current Tennessee plan that adopted the Texas Reject Intervals ensures that CLEC orders are returned in a timely manner. Birch strongly supports the Tennessee plan's adoption of the Texas standards for Reject Interval.

Q. CAN YOU EXPLAIN WHY THE BENCHMARKS FOR FLOW-THROUGH ARE SO IMPORTANT?

A. Flow-through measures how many CLEC LSRs pass through BellSouth's OSS and FOC is returned without manual handling by BellSouth. This measure impacts competition very significantly. The ability of BellSouth's OSS to operate in a mechanical fashion will have a meaningful effect on a CLEC's ability to add new customers and service existing customers. When orders do not pass through BellSouth's OSS mechanically (partially mechanized), the CLEC's LSRs are subjected to longer timeframes and the greater possibility of human error as BellSouth service representatives will re-type the CLEC LSRs so they can be accepted by BellSouth's legacy provisioning systems. Comparatively, BellSouth's Retail operation does not have another organization re-typing service orders (as the LCSC does for CLEC orders), and as a result, it follows that when CLEC LSRs are handled manually by BellSouth, the result is not parity service for the CLEC. Birch believes that BellSouth does not desire to have large volumes of orders falling out for manual handling. However, flow-through standards need to be set at levels that require BellSouth to increase flow-through in order to provide parity access to the ordering function. Additionally, the

current Tennessee flow-through measure is based on the eligibility of the LSR the CLEC submits to be processed mechanically. If the LSR is not designed by BellSouth to flow through (which many are not), it is excluded from the measurement. The benchmarks are set at 95% for Resale Residence, 90% for Resale Business, and 85% for UNE and LNP orders that are **eligible** to flow-through BellSouth's OSS. If LSRs are **designed** to be processed mechanically, the benchmark should be set at 98%. BellSouth should also be required to report on a diagnostic basis, the total flow-through rate (excluding LSRs with CLEC errors), regardless of eligibility. This would give the Regulatory Authority and CLECs the information needed to assess, over time, BellSouth's improvement of the mechanization of all LSRs.

Q. DO THE BENCHMARKS FOR FLOW-THROUGH DISCRIMINATE AGAINST UNE-P PROVIDERS?

A. Yes, as the Tennessee plan is currently adopted, UNE-P providers are not ensured the same flow-through rates as resale providers, let alone BellSouth retail. Because UNE-P is a combination of UNEs, UNE-P LSRs are counted in the UNE disaggregation. CLECs that choose to use UNE-P to serve customers should expect the same levels of service from BellSouth as resale providers or BellSouth's retail operations are provided. Setting different benchmarks for UNE-P and resale does not allow UNE-P providers to be assured of the same flow-through percentages.

Q. WHAT IS YOUR UNDERSTANDING OF THE AVERAGE COMPLETION INTERVAL MEASUREMENT?

A. The Average Completion Interval measurement determines if BellSouth is completing CLEC orders in a timeframe that is consistent with the completion of BellSouth retail orders (or an established benchmark if no retail analog exists). Specifically, the measurement determines if a Tennessee end user can receive services from a CLEC in the same amount of time as BellSouth retail could provide the same service.

Q. DOES THE AVERAGE COMPLETION INTERVAL MEASURE, AS ADOPTED IN TENNESSEE, ADEQUATELY CAPTURE THE END USER EXPERIENCE?

A. The Average Completion Interval measure as adopted in Tennessee does not capture the complete end user experience. The Tennessee business rule start time is the timestamp of the order once it is entered into the legacy BellSouth provisioning system SOCS and the stop time is the timestamp once the service order is completed. Using both the Texas (also Kansas and Oklahoma plans) and New York (Massachusetts' plan is similar to New York) Average Completion Interval measures that have passed the scrutiny of the Federal Communications Commission, the start time should be adjusted to the timestamp of the receipt of an accurate and complete LSR. The adjustment of the start time provides a more accurate measure of the end user experience and ensures that BellSouth is providing parity service. Attachments 1 & 2 to my testimony are the business

rules used for the Texas[1] and New York[2] Average Completion Interval measures, respectfully. The key language of the Texas measurement is the first sentence of the business rule section that states: "The clock starts on the Application Date, which is the day that SWBT receives a correct Service Order / LSR." The key New York language is included the in last sentence of the Definition section and the POTS and Specials sub-section. The sentence defines the start date (application date) as the date a valid service request is received.

Q. CAN YOU DEMONSTRATE HOW THE TEXAS STANDARDS, IF IMPLEMENTED BY BELLSOUTH, WOULD FACILITATE COMPETITION?

A. Yes. It has been Birch's commercial experience that the ILEC will operate at the levels set within the Performance Standards. If the benchmarks are set at low levels, then the ILEC will perform to those low levels. Similarly, if the benchmarks are set at levels that would allow CLECs to compete on a parity basis, then the ILEC will strive to achieve those standards and competition will flourish. To illustrate this point, I will highlight the Texas Performance Standards and SWBT's performance. In early 1999, the performance measures, and consequently the performance of Southwestern Bell, for FOC Timeliness and Reject Interval were set at 95% within 24 hours. SWBT performed to that level for both measurements. Later that year, the CLEC community, along with SWBT

[1] Texas measurement taken from the 6/15/2001 Southwestern Bell filing in Docket 20400 that contains Version 2.0 of Southwestern Bell Business Rules of Performance Measurements.

[2] New York measurement taken from the 2/28/2000 Bell Atlantic Compliance Filing in Case 97-C-0139 which contains the Carrier to Carrier Guidelines Performance Standards and Reports.

and the Texas Commission worked through collaborative workshops to revise and improve performance measures to new levels, specifically changing the FOC and Reject Intervals to 95% within 5 hours. SWBT's performance for these measurements improved significantly throughout 1999 and in 2000, and SWBT consistently meets these benchmarks. The change to the standards greatly assisted Birch in increasing volumes from an average of 2,000 LSRs a month in 1999 to over 9,000 a month in 2000. The Texas CLEC UNE volumes as a whole also increased from 30,000 LSRs per month in 1999, to over 180,000 UNE LSRs for the month of March 2001. This experience in Texas provides a good example of how Performance Standards can influence ILEC performance. In other words, the ILEC will not strive to achieve more than the standard requires even if it is capable of a higher level of performance.

Q. DO YOU HAVE ANY BELLSOUTH EXPERIENCE TO DATE THAT SUGGESTS IMPROVED MEASURES ARE NEEDED?

A. Yes. Birch has recently moved from testing into production mode in five of the nine BellSouth states. Birch began placing production orders in Tennessee at the end of December 2000. Birch's experience from an ordering perspective shows why flow-through is very important and how flow-through alone can solve many of the benchmark questions and issues that I raise as part of this testimony. When CLEC submitted LSRs flow-through BellSouth's OSS (fully mechanized), no manual intervention is required by BellSouth and the transactions occur quickly. When the LSRs do not flow-through BellSouth's OSS (partially mechanized), manual intervention is required and the transactions take a much longer time.

Birch experience also shows the importance of performance standards for orders that are manually handled by BellSouth. To illustrate this, I will use Birch's performance measurement data from the month of May as reported by BellSouth on the PMAP website. BellSouth reported an achieved flow-through rate of 63.6% of Birch's Tennessee LSRs that contained no errors and were eligible to flow-through. This indicates that 36.4% of Birch's LSRs required BellSouth to manually enter the order into BellSouth's legacy provisioning systems (partially mechanized). The results show that Birch's ordering success and timeliness is **very** dependent on BellSouth's manual processes. The performance standards for which BellSouth is held dictate how timely Birch is able to order services and ultimately whether Birch is able to compete with BellSouth retail.

Q. CAN YOU PLEASE SUMMARIZE YOUR TESTIMONY?

A. Birch supports the Tennessee plan as adopted and suggests a few changes that will allow Birch a meaningful opportunity to compete in the state of Tennessee. In doing so, I have provided support to the benchmarks established for FOC Timeliness and Reject Interval; outlined the need for the TRA to give particular attention to the Flow-Through benchmark for UNE-P (98% for UNE-P LSRs); and provided rationale for the change to the start timestamp of the Average Completion Interval measurement. These recommendations will promote parity service and will help competition flourish in Tennessee. Further, requiring BellSouth to report total flow-through, regardless of the eligibility of the LSR, will encourage increased mechanization for all CLECs.

II. RESALE POTS AND UNE LOOP AND PORT COMBINATIONS COMBINED BY SWBT

A. Provisioning

27. Measurement
Mean Installation Interval
Definition:
Average business days from application date to completion date.
Exclusions:
• Excludes customer-caused misses. • Field Work orders – excludes customer requested due dates greater than 5 business days. • No Field Work orders – excluded if order applied for before 3:00 p.m.; and the due date requested is not same day; and if order applied for after 3:00 p.m.; and the due date requested is beyond the next business day. • Excludes all orders except N, T, and C orders. • Excludes Weekends and Holidays. • Excludes expedites for which the CLEC pays.
Business Rules:
The clock starts on the Application Date, which is the day that SWBT receives a correct Service Order (EASE) / LSR (LEX or EDI). The clock stops on the Completion Date, which is the day that SWBT personnel complete the service order activity. Orders are included in the month they are completed. There are 2 types of orders in the measurement. Same Day Due orders (defined as distribution time EQUAL or BEFORE 3:00 p.m. and Application Date = Distribution Date = Due Date. Next Day Due orders (defined as distribution time AFTER 3:00 p.m. and Application Date = Distribution Date and Due Date is one business day after Application Date. If the order is Same Day Due, then (Completion – Application Date), if the order is Next Day Due, then [(Completion – Next Business Day) + 1]. UNE Combinations, are reported at order level.
Levels of Disaggregation:
POTS • Field Work (FW) • No Field Work (NFW) • Business class of service • Residence class of service UNE Combination • Field Work (FW) • No Field Work (NFW)
Calculation: | **Report Structure:**

[Σ(completion date – application date)]/(Total number of orders completed)	Reported for CLEC, all CLECs and SWBT.
Measurement Type:	
Tier 1 – High Tier 2 – High	
Benchmark:	
Resale POTS parity between Field Work compared to SWBT Field Work (N, T, C order types) and No Field Work compared to SWBT Retail No Field Work (N, T, C order types). UNE Combination Parity between Field Work compared to SWBT Field Work (N, T, C order types) and No Field Work compared to SWBT Retail No Field Work. (N, T, C order types).	

Provisioning (PR)

Function:
PR-1 Average Interval Offered
Definition:
POTS and Specials: Average Offered Interval is also known as the average appointed interval. The average number of business days between order application date and committed due date (appointment date). The application date is the date that a valid service request is received. *Complex* Orders include: Two Wire Digital Services (ISDN) and Two Wire xDSL Services. Specials Orders Include: All Designed circuits, 4 wire circuits (including Primary rate ISDN and 4 Wire xDSL services), all DS0, DS1 and DS3 circuits. EEL and IOF to be reported separately. Trunks: The amount of time in business days between receipt of a clean ASR (received date restarted for each SUPP) and due date committed to from firm order confirmation. Measures service orders completed between the measured dates. Notes: (1) The offered intervals for cancelled orders are counted in the month in which the cancellation occurs. (2) Sub-metrics reported according to line size groupings will be based on the total lines in the orders.
Exclusions:
• BA Test Orders. • Orders where customers request a due date that is beyond the standard available appointment interval. (X Appointment Code[18]). • Bell Atlantic Administrative orders. [19] • Orders with invalid intervals (Negative Intervals or intervals over 200 business days – indicative of typographical error). • Additional Segments (pages or sections on individual orders) on orders (parts of a whole order are included in the whole). • Retail Suspend for non-payment and associated restore orders. • Orders that are not completed or cancelled
Performance Standard:
Parity with BA Retail. See Interval Guide for specific products and services.
Report Dimensions

Company:	Geography:
• BA Retail • CLEC Aggregate • CLEC Specific	• POTS and Complex: Manhattan, Greater Metro, Suburban and North-State • Specials & Trunks: NY State (LATA 132 and Remaining State – as identified)

[18] Orders that are or should be X appointment coded. Effective 2/00, BA will automate appointment coding.
[19] BA Administrative Orders – See Glossary

Sub-Metrics – PR-1 Average Interval Offered			
PR-1-01	**Average Interval Offered – Total No Dispatch**		
Products	*Retail:* • POTS: Residence • POTS: Business • 2 Wire Digital Services • 2 Wire xDSL Services • Specials	*Resale:* • POTS: Residence • POTS: Business • 2 Wire Digital Services • 2 Wire xDSL Services • Specials	*UNE:* • POTS – Hot Cut Loop • POTS – Platform • POTS - Other (UNE Switch & INP) • 2 Wire Digital Services • 2 Wire xDSL Services • Specials
Calculation	**Numerator**		**Denominator**
	Sum of committed due date less application date for Orders without an outside dispatch in Product Groups		Count of Orders without an outside dispatch in Product Groups
PR-1-02	**Average Interval Offered – Total Dispatch**		
Products	*Retail:* • 2 Wire Digital Services • 2 Wire xDSL Services • Specials	*Resale:* • 2 Wire Digital Services • 2 Wire xDSL Services • Specials	*UNE:* • 2 Wire Digital Services • 2 Wire xDSL Services • Specials
Calculation	**Numerator**		**Denominator**
	Sum of committed due date less application date for Orders with an outside dispatch in Product Groups.		Count of Orders with an outside dispatch in Product Groups.
PR-1-03	**Average Interval Offered – Dispatch (1-5 Lines)**		
Products	*Retail:* • POTS: Residence • POTS: Business	*Resale:* • POTS: Residence • POTS: Business	*UNE:* • POTS – Platform • POTS - Loop
Calculation	**Numerator**		**Denominator**
	Sum of committed due date less application date for POTS Orders with an outside dispatch in Product Groups for orders with 1 to 5 lines.		Count of POTS Orders with an outside dispatch in Product Groups for orders with 1 to 5 lines.
PR-1-04	**Average Interval Offered – Dispatch (6-9 Lines)**		
Products	*Retail:* • POTS - Total	*Resale:* • POTS – Total	*UNE:* • POTS – Platform • POTS - Loop
Calculation	**Numerator**		**Denominator**
	Sum of committed due date less application date for POTS Orders with an outside dispatch in Product Groups for orders with 6 to 9 lines.		Count of POTS Orders with an outside dispatch in Product Groups for orders with 6 to 9 lines.

Sub-Metrics – PR-1 Average Interval Offered (continued)			
PR-1-05	**Average Interval Offered – Dispatch (≥ 10 Lines)**		
Products	*Retail:* • POTS - Total	*Resale:* • POTS – Total	*UNE:* • POTS – Platform • POTS - Loop
Calculation	**Numerator**	**Denominator**	
	Sum of committed due date less application date for POTS Orders with an outside dispatch in Product Groups for orders with 10 or more lines.	Count of POTS Orders with an outside dispatch in Product Groups for orders with 10 or more lines.	
PR-1-06	**Average Interval Offered – DS0**		
Products	*Retail:* • Specials	*Resale:* • Specials	*UNE:* • Specials
Calculation	**Numerator**	**Denominator**	
	Sum of committed due date less application date for Special Services orders for DS0 services.	Count of Special Services orders for DS0 services.	
PR-1-07	**Average Interval Offered – DS1**		
Products	*Retail:* • Specials	*Resale:* • Specials	*UNE:* • Specials
Calculation	**Numerator**	**Denominator**	
	Sum of committed due date less application date for Special Services orders for DS1 services.	Count of Special Services orders for DS1 services.	
PR-1-08	**Average Interval Offered – DS3**		
Products	*Retail:* • Specials	*Resale:* • Specials	*UNE:* • Specials
Calculation	**Numerator**	**Denominator**	
	Sum of committed due date less application date for Special Services orders for DS3 services.	Count of Special Services orders for DS3 services.	
PR-1-09	**Average Interval Offered – Total**		
Products	Retail: • IXC FG D Trunks	UNE: • IOF • EEL – Backbone • EEL – Loop	CLEC Trunks: • Interconnection Trunks (≤ 192 Trunks) • CLEC Trunks (> 192 and Unforecasted Trunks)
Calculation	**Numerator**	**Denominator**	
	Sum of committed due date less application date for product group orders.	Count of orders for product group.	

Sub-Metrics – PR-1 Average Interval Offered (continued)			
PR-1-10	**Average Interval Offered – Disconnects – No Dispatch**		
Products	*Retail:* • POTS (incl. Complex) • Specials	*Resale:* • POTS (incl. Complex) • Specials	*UNE:* • POTS (Incl. Complex) • Specials
Calculation	**Numerator**	**Denominator**	
	Sum of committed due date less application date for product group no dispatch disconnect (D & F) orders.	Count of orders for product group.	
PR-1-11	**Average Interval Offered – Disconnects – Dispatch**		
Products	*Retail:* • POTS (incl. Complex) • Specials	*Resale:* • POTS (incl. Complex) • Specials	*UNE:* • POTS (Incl. Complex) • Specials
Calculation	**Numerator**	**Denominator**	
	Sum of committed due date less application date for product group dispatch disconnect (D&F) orders.	Count of orders for product group.	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via facsimile or hand delivery, to the following on this the 16th day of July, 2001.

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