BELLSOUTH

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September 6, 2001

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

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

Dear Mr. Waddell:

During the hearings in the above-referenced docket, Directors Greer and Malone asked BellSouth to provide an exhibit reflecting the most stringent benchmarks and standards that BellSouth had voluntarily agreed to impose on itself anywhere in the region, as well as the most stringent benchmarks and standards that had been imposed on BellSouth by any state commission.

The attached documents provide the requested information. Attachment 1 reflects for each proposed measurement for which there is a benchmark, the most stringent benchmark BellSouth voluntarily agreed to, as well as the most stringent benchmark that a state commission has imposed. Attachment 2, which may go beyond what the Directors requested, but which is submitted in order to insure that the response is as complete as possible, is the corresponding information for the analogs that have been proposed in Tennessee and ordered by the Georgia and Florida commissions. Since analogs by their very nature do not lend themselves to the same degree of certainty as a benchmark, we have not attempted to characterize the various analogs in other states as more or less stringent than those proposed in Tennessee, but would note that when the analog for any particular proposed level of disaggregation is compared to what has been ordered in Georgia and Florida, they are the same with one exception, related to the days allowed for

providing an xDSL loop. The Florida Public Service Commission shortened the time from BellSouth's proposed 7 and 14 days to 5 and 12 days as is noted in the footnote. Indeed, this perhaps should be more properly included as a benchmark rather than an analog, but since all of the other order completion intervals are compared to analogs, this was left in this section.

We would also note that some of these standards have changed over time, which makes it difficult to make a direct comparison in every instance. For instance, with regard to measure OSS-1, at one point we were proposing to measure the response time from the BellSouth side of the firewall. In that situation, we proposed "parity" as the standard. Now we measure the response time differently, and therefore have proposed a different standard, "parity + 4 seconds." We point this out to simply indicate that the business rules and exclusions have changed over time in some instances, and occasionally when such a change occurs, it also affects the benchmarks and standards upon which we are trying to report in the attachments.

Fourteen copies of BellSouth's late-filed exhibit are enclosed. Copies are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
OSS-1	Average Response Time for OSS Pre-Order Interfaces & Response Interval	Parity + 4	Parity + 4[1]	Parity + 2	Florida; Georgia
OSS-2	Interface Availability (Pre-Ordering/Ordering)	≥ 99.5 %	99.5%	99.5%	
OSS-3	Interface Availability (M & R)	≥ 99.5 %	99.5%	99.5%	
OSS-4	Response Interval (M & R)	Parity	Parity	Parity	
PO-1	Average Response Time for Loop Makeup Information – Manual	95% 3 Bus Days	95% 3 Bus Days	95% 3 Bus Days	
PO-2	Average Response Time for Loop Makeup Information – Electronic	90% 5 min (Reassess after 6 months- new system)	90% 5 min (Reassess after 6 months- new system)	95% ≤1 Minute	Florida
O-1	Acknowledgement Timeliness	95% 30 min.	95% 30 min.	95% 30 min.	
O-2	Acknowledgement Completeness	100%	100%	100%	

[1] This measure has changed over time, with regard to the points at which the measurement is taken. As a consequence, in some instances, the proposed standard was simply "parity." The standard of "parity + 4 seconds" is the most stringent standard voluntarily proposed by BellSouth under the current definition.

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
O-3	Percent Flow-thru Service Requests (Summary)	Res 95% Bus 90% UNE 85% LNP 85%	Res 95% Bus 90% UNE 85% LNP 85%	Res – 90%; 95% after 6 months Bus – 80%; 90% after 6 months UNE – 80%; 90% after 6 months LNP Standalone – 80%; 90% after 6 months	Louisiana
O-4	Percent Flow-thru Service Requests (Detail)	Res 95% Bus 90% UNE 85% LNP 85%	Res 95% Bus 90% UNE 85% LNP 85%	Res 95% Bus 90% UNE 85% LNP 85%	
O-5	Flow-thru Error Analysis	NA	NA	NA	
O-6	CLEC LSR Information LSR Flow-thru Matrix	NA	NA	NA	
O-7	Percent Rejected Service Requests	Diagnostic	Diagnostic	Diagnostic	

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
O-8	Reject Interval	Fully Mechanized 95% 1 hr Partially Mechanized 85% 10 hrs Non-Mechanized 85% 24 hrs Local Trunks 85% 4 days	Fully Mechanized[2] 97% 1 hr Partially Mechanized 85% 10 hrs Non-Mechanized 85% 24 hrs Local Trunks 85% 4 days	Fully Mechanized 97% 1 hr Partially Mechanized 95% 10 hrs Non-Mechanized 95% 24 hrs Local Trunks 95% 36 hrs	Florida
O-9	FOC Timeliness	Fully Mechanized 95% 3 hrs Partially Mechanized 85% 10 hrs Non-Mechanized 85% 36 hrs Local Trunks 95% 10 days	Fully Mechanized 95% 3 hrs Partially Mechanized 85% 10 hrs Non-Mechanized 85% 36 hrs Local Trunks 95% 10 days	Fully Mechanized 95% 1 hr --- Fully Mechanized 95% 3 hrs Partially Mechanized 95% 10 hrs Non-Mechanized 95% 24 hrs Local Trunks 95% 48 hrs	Louisiana --- Florida
O-10	Service Inquiry w LSR FOC Response Time Manual	95% 5 Bus Days	95% 5 Bus Days	95% 5 Bus Days	
O-11	Firm Order Confirmation and Reject Response Completeness	95% Returned	95% Returned	95% Returned	

[2] BellSouth originally proposed the same benchmark in Florida as in Tennessee (95 % within 1 hour). Subsequently, the FPSC ordered the use of the more stringent benchmark in its third party testing, and since the FPSC had made this decision, BellSouth reflected the more stringent benchmark in its most recent filing in Florida.

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
O-12	**Speed of Answer in Ordering Center**	Diagnostic	Diagnostic	Parity with Retail	Georgia; Louisiana; Florida
	Percent Rejected Service Requests – LNP	Diagnostic – included in Percent Rejected Service Requests	Diagnostic	Diagnostic	
	Reject Interval Distribution & Average Reject Interval – LNP	**Included in SQM Reject Interval:** Fully Mechanized 95% 1 hr Partially Mechanized 85% 10 hrs Non-Mechanized 85% 24 hrs	Fully Mechanized[3] 97% in 1 hr Partially Mechanized 85% in 10 hrs Non-Mechanized 85% in 24 hrs	Fully Mechanized 97% in 1 hr Partially Mechanized 95% in 10 hrs Non-Mechanized 95% in 24 hrs	Florida

[3] See footnote 2.

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
	FOC Timeliness Interval Distribution & Average Interval - LNP	**Included in SQM FOC Timeliness:** Fully Mechanized 95% 3 hrs Partially Mechanized 85% 10 hrs Non-Mechanized 85% 36 hrs	 Fully Mechanized 95% 3 hrs Partially Mechanized 85% 10 hrs Non-Mechanized 85% 36 hrs	Fully Mechanized 95 % in 1 hr --- Fully Mechanized 95% in 3 hrs Partially Mechanized 95% in 10 hrs Non-Mechanized 95% in 24 hrs	Louisiana --- Florida
P-1	**Mean Held Order Interval & Distribution Interval**	Parity	Parity	Parity	
P-2	**Average Jeopardy Notice** **% Orders Given Jeopardy Notices**	95% in 48 hrs Parity	95% in 48 hrs Parity	95% in 48 hrs Parity	
P-3	**% Missed Installation Appointments**	Parity	Parity	Parity	
P-4	**Average Completion Interval (OCI) & Order Completion Distribution** **OCI – LNP**	Parity	Parity	Parity	

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
P-5	Average Completion Notice Interval	Parity	Parity	Parity	
P-6	Coordinated Customer Conversions Interval	95% in 15 min	95% in 15 min	95% in 15 Minutes 98% in 15 Minutes after 6 months	Louisiana
P-6A	Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval	Time Spec/ Non-time 95% +/- 15 min of Scheduled Start Time IDLC 95% Within 4 hr window	Time Spec/ Non-time 95% +/- 15 min of Scheduled Start Time IDLC 95% Within 4 hr window	Time Spec/ Non-time 95% +/- 15 min of Scheduled Start Time	Louisiana
P-6B	Coordinated Customer Conversions – Average Recovery Time	Diagnostic	Diagnostic	Diagnostic	
P-6C	Coordinated Customer Conversions – % PT Within 7 Days	≤ 5%	≤ 5%	≤ 5%	
P-7	Cooperative Acceptance Testing – % xDSL Loops Tested	95% of Lines Tested	95% of Lines Tested	95% of Lines Tested	
P-8	% Provisioning Troubles Within 30 Days	Parity	Parity	Parity	

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
P-9	TSOCT	Diagnostic	Diagnostic	Diagnostic	
	LNP - Average Disconnect Timeliness interval	Not Proposed: Replaced by P-10A & P-10B	95% < 15 min	95% < 15 min	Georgia; Florida
P-10A	LNP- Average Time of Out of Service for LNP Conversions	95% within 60 minutes unless a different industry guideline is established that will override the benchmark	95% within 60 minutes unless a different industry guideline is established that will override the benchmark	95% within 60 minutes unless a different industry guideline is established that will override the benchmark	
P-10B	% Time (SBT) Applies the 10-digit Trigger Prior to the LNP Order Due Date	95%	95%	95%	
P-11	% Missed Install Appt –LNP	Parity	Parity	Parity	
	TSOCT – LNP	Included in SQM TSOCT (Diagnostic)	Diagnostic	Diagnostic	
M&R- 1	Missed Repair Appts	Parity	Parity	Parity	
M&R- 2	Customer Trouble Report Rate	Parity	Parity	Parity	
M&R- 3	Maintenance Avg Duration	Parity	Parity	Parity	
M&R- 4	% Repeat Troubles in 30	Parity	Parity	Parity	
M&R- 5	OOS > 24 Hours	Parity	Parity	Parity	
M&R- 6	Average Answer Time – Repair Centers (Region)	Parity	Parity	Parity	

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
M&R- 7	Meantime to Notify CLEC of Network Outages	Parity by Design	Parity by Design	Parity by Design	
B-1	Invoice Accuracy	Parity	Parity	Parity	
B- 2	Mean Time to Deliver Invoices	Parity	Parity	Parity	
B- 3	Usage Data Delivery Accuracy	Parity	Parity	Parity	
B- 4	Usage Data Delivery Completeness	≥ 98% A parity measure is also provided	Parity[4]	Parity (See footnote 4)	Georgia; Louisiana; Florida
B- 5	Usage Data Delivery Timeliness	≥ 95% Within 6 calendar days A parity measure is also provided	Parity (See footnote 4)	Parity (See footnote 4)	Georgia; Louisiana; Florida
B- 6	Mean Time to Deliver Usage	≤ 5 days A parity measure is also provided	Parity (See footnote 4)	Parity (See footnote 4)	Georgia; Louisiana; Florida
B- 7	Recurring Charge Completeness	Resale Parity UNE 90% I/C 90%	Resale Parity UNE 90% I/C 90%	Resale Parity UNE 90% I/C 90%	

[4] The standard reflected is not more stringent than the benchmark proposed by BellSouth. The standard was changed to a benchmark from parity because the CLEC and BellSouth processes formerly used as analogs are not comparable.

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
B- 8	Non-Recurring Charge Completeness	Resale Parity UNE 90% I/C 90%	Resale Parity UNE 90% I/C 90%	Resale Parity UNE 90% I/C 90%	
OS- 1	Speed to Answer (Toll)	Parity by Design	Parity by Design	Parity by Design	
OS- 2	Speed to Answer (Toll) % Answered w/I 'X' Secs	Parity by Design	Parity by Design	Parity by Design	
DA-1	Speed to Answer (DA)	Parity by Design	Parity by Design	Parity by Design	
DA-2	Speed to Answer (DA) % Answered w/I 'X' Secs	Parity by Design	Parity by Design	Parity by Design	
D-1	Database Update	Parity by Design	Parity by Design	Parity by Design	
D-2	Database Update Accuracy	95%	95%	95%	
D-3	NXX & LRNs Loaded by LERG Effective Date	100% by LERG effective date	100% by LERG effective date	100% by LERG effective date	
E- 1	E911 – Timeliness	Parity by Design	Parity by Design	Parity by Design	
E- 2	E911- Accuracy	Parity by Design	Parity by Design	Parity by Design	
E- 3	E911- Mean Interval	Parity by Design	Parity by Design	Parity by Design	

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
TGP- 1	Trunk Group Performance – Aggregate	Any 2 hr period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs & 1,9,10,16 for BellSouth	Any 2 hr period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs & 9 for BellSouth[5]	Any 2 hr period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs & 9 for BellSouth (See footnote 5)	
TGP- 2	Trunk Group Performance – CLEC Specific	Any 2 hr period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs & 1,9,10,16 for BellSouth	Any 2 hr period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs & 9 for BellSouth (See footnote 5)	Any 2 hr period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs & 9 for BellSouth (See footnote 5)	

[5] The standard reflected is not more stringent than BellSouth's proposed standard. Rather, these trunk group measurements were changed to include trunk groups 1, 10 and 16 as BellSouth retail analogs. This change provides a more accurate and complete comparison of CLEC versus BellSouth trunk group performance.

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
C- 1	**Average Response Time**	Virtual – 20 Calendar Days Physical Caged – 23 Business Days Physical Cageless – 23 Business Days Augments for Line Sharing or Line Splitting – 23 Business Days	BellSouth's proposals for Average Response Time were based on Orders of the State Commissions or the FCC.	Virtual – 15 Calendar Days Physical Caged – 15 Calendar Days Physical Cageless – 15 Calendar Days	Florida[6]

[6] These collocation intervals were established in a FPSC Order, which became effective May 11, 2000. BellSouth subsequently included these intervals as part of the Florida performance measurements filing. The intervals proposed for Tennessee are based on the FCC guidelines.

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
C- 2	**Average Arrangement Time**	Virtual -50 Calendar Days (Ordinary); Virtual- 75 Calendar Days (Extraordinary); Physical Caged- 76 Business Days (Ordinary); Physical Caged- 91 Business Days (extraordinary); Physical Cageless-76 Calendar Days (Ordinary); Physical Cageless-91Calendar Days (Extraordinary); Augments for Line Sharing or Line Splitting – 45 Business Days	BellSouth's proposals for Average Arrangement Time were based on Orders of the State Commissions or the FCC.	Virtual Augment – 45 Calendar Days (w/o space increase); Virtual – 60 Calendar Days; Physical Caged Augment – 45 Calendar Days (w/o Space increase); Physical Caged – 90 Calendar Days (Ordinary); Physical Cageless Augment – 45 Calendar Days (w/o Space Increase) Physical Cageless – 90 Calendar Days	Florida (See footnote 6)
C- 3	**% Due Dates Missed**	95% on time	95% on time	95% on time	

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
CM- 1	Timeliness of Change Management Notices	95% ≥ 30 days of Release	95% ≥ 30 days of Release	98% ≥ 30 days of Release 98% on Time	Louisiana; Florida
CM- 2	Average Delay Days for Change Management Notices	≤ 8 Days	≤ 8 Days	≤ 5 Days	Florida
CM- 3	Timeliness of Documents Associated with Change	95% ≥ 30days if new features coding is required 95% ≥ 5 days for documentation defects, corrections or clarifications	95% ≥ 30days if new features coding is required 95% ≥ 5 days for documentation defects, corrections or clarifications	98% on Time	Florida
CM-4	Change Management Documentation Average Delay Days	≤ 8 Days	≤ 8 Days	95% ≤ 5 Days	Florida
CM- 5	Notification of Interface Outages	97% 15 min	97% 15 min	97% 15 min	
	% Service Order Accuracy	95%	95%	95%	

Analysis of Proposed/Ordered SQM Benchmarks

TN No.	Tennessee Measurement Description	Standard Proposed by BellSouth for Tennessee	Most Stringent Standard Voluntarily Proposed By BellSouth	Most Stringent Benchmark Included in a State Order	Source of Most Stringent Benchmark Ordered If Different Than Proposed
	Bona Fide/New Business Requests Processed in 30 Business Days	Not Proposed	Not Proposed	90% ≤ 30 Business Days	Georgia
	% Quotes provided for Authorized BFRs/Special Requests w/l 'X' Days (10,30,90)	Not Proposed	Not Proposed	90% ≤ 10/30/90 Business Days (Network Elements operational at time of request – 10 Days); (Network Elements Ordered by FCC – 30 days); (New Network Elements – 90 Days)	Georgia
	% Completion Attempts w/o a Notice or < 24 hours Notice	Not Proposed	Not Proposed	≤5%	Florida
	Percent Completion of Timely Loop Modification	Not Proposed	Not Proposed	95% ≤ 5 Business Days	Florida
	Percent Billing Errors Corrected in X Days	Not Proposed	Not Proposed	Diagnostic	Florida

Analysis of Proposed/Ordered SQM Retail Analogs

Tennessee Measurement	Level of Disaggregation and Associated Retail Analogs Proposed by BellSouth for Tennessee		Level of Disaggregation and Associated Retail Analogs Ordered By Georgia Commission		Level of Disaggr Retail Analogs I Commission St
	Disaggregation	Retail analog	Disaggregation	Retail analog	Disaggregation
	Resale Residence	Retail Residence	Resale Residence	Retail Residence	Resale Residence
	Resale Business	Retail Business	Resale Business	Retail Business	Resale Business
	Resale Design	Retail Design	Resale Design	Retail Design	Resale Design
	Resale PBX	Retail PBX	Resale PBX	Retail PBX	Resale PBX
	Resale Centrex	Retail Centrex	Resale Centrex	Retail Centrex	Resale Centrex
	Resale ISDN	Retail ISDN	Resale ISDN	Retail ISDN	Resale ISDN
	LNP	Retail Res and Bus (POTS)	LNP (Standalone)	Retail Res and Bus (POTS)	LNP (Standalone)
	2W Analog Loop Design	Retail Res and Bus Dispatch	INP (Standalone)	Retail Res and Bus (POTS	2W Analog Loop Design
	2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	2W Analog Loop Design	Retail Res and Bus Dispatch	2W Analog Loop Non-Design
			2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	- Dispatch
	UNE Loop + Port Combos	Retail Res and Bus		Retail Res & Bus Dispatch	- Non-Dispatch (Dispatch In)
	UNE Switch Ports	Retail Res and Bus (POTS)	2W Analog Loop w/INP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	2W Analog Loop w/LNP Design
	UNE Other Non-Design	Retail Res and Bus	2W Analog Loop w/INP Non-Design	Retail Res & Bus Dispatch	2W Analog Loop w/LNP Non-Design
	UNE Other Design	Retail Design	2W Analog Loop w/LNP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	- Dispatch
	UNE Digital Loop < DS1	Retail Digital Service < DS1	2W Analog Loop w/LNP Non-Design	Retail Res and Bus	- Non-Dispatch
	UNE Digital Loop ≥ DS1	Retail Digital Service ≥ DS1	UNE Loop + Port Combos	Retail Res and Bus (POTS)	UNE Digital Loop < DS1
	UNE Combination Other	Retail Res, Bus & Design Dispatch	UNE Switch Ports	Retail Res & Bus	UNE Digital Loop ≥ DS1
	UNE xDSL (ADSL,HDSL,UCL)	ADSL Provided to Retail	UNE Other Non-Design	Retail Design	UNE Loop + Port Combos
	UNE Line Sharing	ADSL Provided to Retail	UNE Other Design	Retail Digital Loop < DS1	- Dispatch Out
	UNE ISDN (Includes UDC)	Retail ISDN – BRI	UNE Digital Loop < DS1	Retail Digital Loop ≥ DS1	- Non-Dispatch
P-1: Mean Held Order Interval & Distribution Intervals	Local Interoffice Transport	Retail DS1/DS3 Interoffice	UNE Digital Loop ≥ DS1	Retail Res, Bus & Design Dispatch	- Dispatch In
	Local Interconnection Trunks	Parity with Retail	UNE Combination Other	ADSL provided to Retail	- Switch -Based
			UNE xDSL (ADSL,HDSL,UCL)	ÀDSL Provided to Retail	UNE Switch Ports
	Note: This measure is further disaggregated based on circuit breakout: < 10 circuits, ≥ 10 circuits (except trunks).		UNE Line Sharing	Retail ISDN – BRI	UNE Other Non-Design
			UNE ISDN (Includes UDC)	Retail DS1/DS3 Interoffice	UNE Other Design
			Local Interoffice Transport	Parity with Retail	UNE Combination Other
			Local Interconnection Trunks		- Dispatch
					- Non-Dispatch (Dispatch-In)
					UNE ISDN (Includes UDC)
					UNE xDSL (ADSL,HDSL,UCL)
					UNE Line Sharing
					UNE Line Splitting
					EELs
					Local Interoffice Transport
					Local Interconnection Trunks

Analysis of Proposed/Ordered SQM Retail Analogs

Tennessee Measurement	Level of Disaggregation and Associated Retail Analogs Proposed by BellSouth for Tennessee		Level of Disaggregation and Associated Retail Analogs Ordered By Georgia Commission		Level of Disaggre Retail Analogs I Commission St
	Disaggregation	Retail analog	Disaggregation	Retail analog	Disaggregation
	% Orders Given Jeopardy Notice				
	Resale Residence	Retail Residence	Resale Residence	Retail Residence	Resale Residence
	Resale Business	Retail Business	Resale Business	Retail Business	Resale Business
	Resale Design	Retail Design	Resale Design	Retail Design	Resale Design
	Resale PBX	Retail PBX	Resale PBX	Retail PBX	Resale PBX
	Resale Centrex	Retail Centrex	Resale Centrex	Retail Centrex	Resale Centrex
	Resale ISDN	Retail ISDN	Resale ISDN	Retail ISDN	Resale ISDN
	LNP	Retail Res and Bus (POTS)	LNP (Standalone)	Retail Res and Bus (POTS)	LNP (Standalone)
	2W Analog Loop Design	Retail Res and Bus Dispatch	INP (Standalone)	Retail Res and Bus (POTS	2W Analog Loop Design
	2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	2W Analog Loop Design	Retail Res and Bus Dispatch	2W Analog Loop Non-Design
			2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	- Dispatch
	UNE Loop + Port Combos	Retail Res and Bus		Retail Res & Bus Dispatch	- Non-Dispatch (Dispatch In)
	UNE Switch Ports	Retail Res and Bus (POTS)	2W Analog Loop w/INP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	2W Analog Loop w/LNP Design
	UNE Other Non-Design	Retail Res and Bus	2W Analog Loop w/INP Non-Design	Retail Res & Bus Dispatch	2W Analog Loop w/LNP Non-Design
	UNE Other Design	Retail Design	2W Analog Loop w/LNP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	- Dispatch
	UNE Digital Loop < DS1	Retail Digital Service < DS1	2W Analog Loop w/LNP Non-Design	Retail Res and Bus	- Non-Dispatch
	UNE Digital Loop ≥ DS1	Retail Digital Service ≥ DS1	UNE Loop + Port Combos	Retail Res and Bus (POTS)	UNE Digital Loop < DS1
P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	UNE Combination Other	Retail Res, Bus & Design Dispatch	UNE Switch Ports	Retail Res & Bus	UNE Digital Loop ≥ DS1
	UNE xDSL (ADSL,HDSL,UCL)	ADSL Provided to Retail	UNE Other Non-Design	Retail Design	UNE Loop + Port Combos
	UNE Line Sharing	ADSL Provided to Retail	UNE Other Design	Retail Digital Loop < DS1	- Dispatch Out
	UNE ISDN (Includes UDC)	Retail ISDN – BRI	UNE Digital Loop < DS1	Retail Digital Loop ≥ DS1	- Non-Dispatch
	Local Interoffice Transport	Retail DS1/DS3 Interoffice	UNE Digital Loop ≥ DS1	Retail Res, Bus & Design Dispatch	- Dispatch In
	Local Interconnection Trunks	Parity with Retail	UNE Combination Other	ADSL provided to Retail	- Switch -Based
			UNE xDSL (ADSL,HDSL,UCL)	ADSL Provided to Retail	UNE Switch Ports
	Note: This measure is further disaggregated by dispatch orders, mechanized orders and non-mechanized orders.		UNE Line Sharing	Retail ISDN – BRI	UNE Other Non-Design
			UNE ISDN (Includes UDC)	Retail DS1/DS3 Interoffice	UNE Other Design
			Local Interoffice Transport	Parity with Retail	UNE Combination Other
			Local Interconnection Trunks		- Dispatch
					- Non-Dispatch (Dispatch-In)
					UNE ISDN (Includes UDC)
					UNE xDSL (ADSL,HDSL,UCL)
					UNE Line Sharing
					UNE Line Splitting
					EELs
					Local Interoffice Transport
					Local Interconnection Trunks
	Average Jeopardy Notice Interval (Electronic Only)	*95% ≥ 48 Hours (Applies to the Disaggregation above)*	*Average Jeopardy Notice Interval (Electronic Only)*	*95% ≥ 48 Hours (Applies to the Disaggregation above)*	*Average Jeopardy Notice Interv (Electronic Only)*

Analysis of Proposed/Ordered SQM Retail Analogs

Tennessee Measurement	Level of Disaggregation and Associated Retail Analogs Proposed by BellSouth for Tennessee		Level of Disaggregation and Associated Retail Analogs Ordered By Georgia Commission		Level of Disaggr Retail Analogs Commission S
P-3: Percent Missed Installation Appointment	<u>Disaggregation</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP 2W Analog Loop Design 2W Analog Loop Non-Design - Dispatch - Non-Dispatch (Dispatch In) UNE Loop + Port Combos - Dispatch Out - Non-Dispatch - Dispatch In - Switch -Based UNE Switch Ports UNE Other Non-Design UNE Other Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Combination Other - Dispatch - Non-Dispatch (Dispatch-In) UNE xDSL (ADSL,HDSL,UCL) UNE Line Sharing UNE ISDN (Includes UDC) Local Interoffice Transport Local Interconnection Trunks Note: This measure is further disaggregated based on circuit breakout: < 10 circuits, ≥ 10 circuits (except trunks).	<u>Retail analog</u> Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders) - Dispatch - Non-Dispatch (Dispatch In) Retail Res and Bus - Dispatch Out - Non-Dispatch - Dispatch In - Switch-Based Retail Res and Bus (POTS) Retail Res and Bus Retail Design Retail Digital Service < DS1 Retail Digital Service ≥ DS1 Retail Res, Bus & Design Dispatch (Incl. Dispatch In & Dispatch Out) - Dispatch - Non-Dispatch (Dispatch In) ADSL Provided to Retail ADSL Provided to Retail Retail ISDN – BRI Retail DS1/DS3 Interoffice Parity with Retail	<u>Disaggregation</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) INP (Standalone) 2W Analog Loop Design 2W Analog Loop Non-Design - Dispatch - Non-Dispatch (Dispatch In) 2W Analog Loop w/INP Design 2W Analog Loop w/INP Non-Design - Dispatch - Non-Dispatch (Dispatch in) 2W Analog Loop w/LNP Design 2W Analog Loop w/LNP Non-Design - Dispatch - Non-Dispatch UNE Loop + Port Combos - Dispatch Out - Non-Dispatch - Dispatch In - Switch -Based UNE Switch Ports UNE Other Non-Design UNE Other Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Combination Other - Dispatch - Non-Dispatch (Dispatch-In) UNE xDSL(ADSL,HDSL,UCL) UNE Line Sharing UNE ISDN (Includes UDC) Local Interoffice Transport Local Interconnection Trunks	<u>Retail analog</u> Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus (POTS Retail Res and Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders) -Dispatch - Non-Dispatch (Dispatch In) Retail Res & Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders - Dispatch -Non-Dispatch (Dispatch In) Retail Res & Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders) - Dispatch - Non-Dispatch Retail Res and Bus - Dispatch Out - Non-Dispatch - Dispatch In - Switch-Based Retail Res and Bus (POTS) Retail Res & Bus Retail Design Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res, Bus & Design Dispatch) - Dispatch - Non-Dispatch (Dispatch-In) ADSL provided to Retail ADSL Provided to Retail Retail ISDN – BRI Retail DS1/DS3 Interoffice Parity with Retail	<u>Disaggregation</u> Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2W Analog Loop Design 2W Analog Loop Non-Design - Dispatch - Non-Dispatch (Dispatch In) 2W Analog Loop w/LNP Design 2W Analog Loop w/LNP Non-Design - Dispatch - Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combos - Dispatch Out - Non-Dispatch - Dispatch In - Switch -Based UNE Switch Ports UNE Other Non-Design UNE Other Design UNE Combination Other - Dispatch - Non-Dispatch (Dispatch In) UNE ISDN (Includes UDC) UNE xDSL (ADSL,HDSL,UCL) UNE Line Sharing UNE Line Splitting EELs Local Interoffice Transport Local Interconnection Trunks

Analysis of Proposed/Ordered SQM Retail Analogs

Tennessee Measurement	Level of Disaggregation and Associated Retail Analogs Proposed by BellSouth for Tennessee		Level of Disaggregation and Associated Retail Analogs Ordered By Georgia Commission		Level of Disaggre Retail Analogs I Commission St
	Disaggregation	Retail analog	Disaggregation	Retail analog	Disaggregation
	Resale Residence	Retail Residence	Resale Residence	Retail Residence	Resale Residence
	Resale Business	Retail Business	Resale Business	Retail Business	Resale Business
	Resale Design	Retail Design	Resale Design	Retail Design	Resale Design
	Resale PBX	Retail PBX	Resale PBX	Retail PBX	Resale PBX
	Resale Centrex	Retail Centrex	Resale Centrex	Retail Centrex	Resale Centrex
	Resale ISDN	Retail ISDN	Resale ISDN	Retail ISDN	Resale ISDN
	LNP	Retail Res and Bus (POTS)	LNP (Standalone)	Retail Res and Bus (POTS)	LNP (Standalone)
	2W Analog Loop Design	Retail Res and Bus Dispatch	INP (Standalone)	Retail Res and Bus (POTS	2W Analog Loop Design
	2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	2W Analog Loop Design	Retail Res and Bus Dispatch	2W Analog Loop Non-Design
		- Dispatch	2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	
	- Dispatch	- Non-Dispatch (Dispatch In)		- Dispatch	- Dispatch
	- Non-Dispatch (Dispatch In)	Retail Res and Bus	- Dispatch	-Non-Dispatch (Dispatch In)	- Non-Dispatch (Dispatch In)
	UNE Loop + Port Combos	- Dispatch Out	- Non-Dispatch (Dispatch In)	Retail Res & Bus Dispatch	2W Analog Loop w/LNP Design
	- Dispatch Out	- Non-Dispatch	2W Analog Loop w/INP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	2W Analog Loop w/LNP Non-Design
	- Non-Dispatch	- Dispatch In	2W Analog Loop w/INP Non-Design	- Dispatch	- Dispatch
	- Dispatch In	- Switch-Based	- Dispatch	- Non-Dispatch (Dispatch In)	- Non-Dispatch
	- Switch -Based	Retail Res and Bus (POTS)	- Non-Dispatch (Dispatch in)	Retail Res & Bus Dispatch	UNE Digital Loop < DS1
	UNE Switch Ports	Retail Res and Bus	2W Analog Loop w/LNP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	UNE Digital Loop ≥ DS1
	UNE Other Non-Design	Retail Design	2W Analog Loop w/LNP Non-Design	-Dispatch	UNE Loop + Port Combos
	UNE Other Design	Retail Digital Service < DS1	- Dispatch	- Non-Dispatch	- Dispatch Out
	UNE Digital Loop < DS1	Retail Digital Service ≥ DS1	- Non-Dispatch	Retail Res and Bus	- Non-Dispatch
	UNE Digital Loop ≥ DS1	Retail Res, Bus & Design Dispatch (Incl. Dispatch In & Dispatch Out)	UNE Loop + Port Combos	- Dispatch Out	- Dispatch In
	UNE Combination Other	- Dispatch	- Dispatch Out	- Non-Dispatch	- Switch -Based
		- Non-Dispatch (Dispatch In)	- Non-Dispatch	- Dispatch In	UNE Switch Ports
	- Dispatch	7 Days w/o conditioning	- Dispatch In	- Switch-Based	UNE Other Non-Design
	- Non-Dispatch (Dispatch-In)	14 Days w/ conditioning	- Switch -Based	Retail Res and Bus (POTS)	UNE Other Design
	UNE xDSL (ADSL,HDSL,UCL)	ADSL Provided to Retail	UNE Switch Ports	Retail Res & Bus	UNE Combo Other
	UNE xDSL (ADSL,HDSL,UCL)	Retail ISDN – BRI	UNE Other Non-Design	Retail Design	- Dispatch
	UNE Line Sharing	Retail DS1/DS3 Interoffice	UNE Other Design	Retail Digital Loop < DS1	- Non-Dispatch (Dispatch-In)
	UNE ISDN (Includes UDC)	Parity with Retail	UNE Digital Loop < DS1	Retail Digital Loop ≥ DS1	UNE ISDN (Includes UDC)
	Local Interoffice Transport		UNE Digital Loop ≥ DS1	Retail Res, Bus & Design Dispatch	UNE xDSL (ADSL,HDSL,UCL)
	Local Interconnection Trunks		UNE Combo Other	- Dispatch	UNE xDSL (ADSL,HDSL,UCL
			- Dispatch	- Non-Dispatch (Dispatch In)	UNE Line Sharing
	Note: This measure is further disaggregated based on circuit breakout: < 10 circuits, ≥ 10 (except trunks) and time interval distribution.		- Non-Dispatch (Dispatch-In)	7 Days w/o conditioning	UNE Line Splitting
			UNE xDSL (ADSL,HDSL,UCL)	14 Days w/conditioning	EELs
			UNE xDSL (ADSL,HDSL,UCL	ADSL Provided to Retail	Local Transport
			UNE Line Sharing	Retail ISDN – BRI	Local Interconnection Trunks
			UNE ISDN (Includes UDC)	Retail DS1/DS3 Interoffice	
			Local Interoffice Transport	Parity with Retail	
P-4: Average Completion Interval (OCI) & Order Completion Interval Distribution			Local Interconnection Trunks		

Analysis of Proposed/Ordered SQM Retail Analogs

Tennessee Measurement	Level of Disaggregation and Associated Retail Analogs Proposed by BellSouth for Tennessee		Level of Disaggregation and Associated Retail Analogs Ordered By Georgia Commission		Level of Disaggr Retail Analogs I Commission St
	Disaggregation	Retail analog	Disaggregation	Retail analog	Disaggregation
	Resale Residence	Retail Residence	Resale Residence	Retail Residence	Resale Residence
	Resale Business	Retail Business	Resale Business	Retail Business	Resale Business
	Resale Design	Retail Design	Resale Design	Retail Design	Resale Design
	Resale PBX	Retail PBX	Resale PBX	Retail PBX	Resale PBX
	Resale Centrex	Retail Centrex	Resale Centrex	Retail Centrex	Resale Centrex
	Resale ISDN	Retail ISDN	Resale ISDN	Retail ISDN	Resale ISDN
	LNP	Retail Res and Bus (POTS)	LNP (Standalone)	Retail Res and Bus (POTS)	LNP (Standalone)
	2W Analog Loop Design	Retail Res and Bus Dispatch	INP (Standalone)	Retail Res and Bus (POTS	2W Analog Loop Design
	2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	2W Analog Loop Design	Retail Res and Bus Dispatch	2W Analog Loop Non-Design
		- Dispatch	2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	
	- Dispatch	- Non-Dispatch (Dispatch In)		- Dispatch	- Dispatch
	- Non-Dispatch (Dispatch In)	Retail Res and Bus	- Dispatch	- Non-Dispatch	- Non-Dispatch (Dispatch In)
	UNE Loop + Port Combos	- Dispatch Out	- Non-Dispatch (Dispatch In)	Retail Res & Bus Dispatch	2W Analog Loop w/LNP Design
	- Dispatch Out	- Non-Dispatch	2W Analog Loop w/INP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders	2W Analog Loop w/LNP Non-Design
	- Non-Dispatch	- Dispatch In	2W Analog Loop w/INP Non-Design	- Dispatch	- Dispatch
	- Dispatch In	- Switch-Based	- Dispatch	- Non-Dispatch	- Non-Dispatch
	- Switch -Based	Retail Res and Bus (POTS)	- Non-Dispatch (Dispatch in)	Retail Res & Bus Dispatch	UNE Digital Loop < DS1
	UNE Switch Ports	Retail Res and Bus	2W Analog Loop w/LNP Design	Retail Res and Bus – (POTS-Excluding Switch-based Orders)	UNE Digital Loop ≥ DS1
	UNE Other Non-Design	Retail Design	2W Analog Loop w/LNP Non-Design	- Dispatch	UNE Loop + Port Combos
	UNE Other Design	Retail Digital Service < DS1	- Dispatch	- Non-Dispatch	- Dispatch Out
	UNE Digital Loop < DS1	Retail Digital Service ≥ DS1	- Non-Dispatch	Retail Res and Bus	- Non-Dispatch
	UNE Digital Loop ≥ DS1	Retail Res, Bus & Design Dispatch (Incl. Dispatch In & Dispatch Out)	UNE Loop + Port Combos	- Dispatch Out	- Dispatch In
	UNE Combination Other	- Dispatch	- Dispatch Out	- Non-Dispatch	- Switch -Based
		- Non-Dispatch (Dispatch In)	- Non-Dispatch	- Dispatch In	UNE Switch Ports
	- Dispatch	ADSL Provided to Retail	- Dispatch In	- Switch-Based	UNE Other Non-Design
	- Non-Dispatch (Dispatch-In)	ADSL Provided to Retail	- Switch -Based	Retail Res and Bus (POTS)	UNE Other Design
	UNE xDSL (ADSL,HDSL,UCL)	Retail ISDN – BRI	UNE Switch Ports	Retail Res & Bus	UNE Combination Other
	UNE Line Sharing	Retail DS1/DS3 Interoffice	UNE Other Non-Design	Retail Design	- Dispatch
	UNE ISDN (Includes UDC)	Parity with Retail	UNE Other Design	Retail Digital Loop < DS1	- Non-Dispatch (Dispatch-In)
	Local Interoffice Transport		UNE Digital Loop < DS1	Retail Digital Loop ≥ DS1	UNE ISDN (Includes UDC)
	Local Interconnection Trunks		UNE Digital Loop ≥ DS1	Retail Res, Bus & Design Dispatch	UNE xDSL (ADSL,HDSL,UCL)
			UNE Combination Other	- Dispatch	UNE Line Sharing
	Note: This measure is further disaggregated by mechanized orders, non-mechanized orders, circuit breakout: < 10 circuits, ≥ 10 (except trunks) and time interval distribution.		- Dispatch	- Non-Dispatch (Dispatch In)	UNE Line Splitting
P-5: Average Completion Notice interval			- Non-Dispatch (Dispatch-In)	ADSL provided to Retail	EELs
			UNE xDSL (ADSL,HDSL,UCL)	ADSL Provided to Retail	Local Interoffice Transport
			UNE Line Sharing	Retail ISDN – BRI	Local Interconnection Trunks
			UNE ISDN (Includes UDC)	Retail DS1/DS3 Interoffice	
			Local Interoffice Transport	Parity with Retail	
			Local Interconnection Trunks		

Analysis of Proposed/Ordered SQM Retail Analogs

Tennessee Measurement	Level of Disaggregation and Associated Retail Analogs Proposed by BellSouth for Tennessee		Level of Disaggregation and Associated Retail Analogs Ordered By Georgia Commission		Level of Disaggre Retail Analogs I Commission St
	Disaggregation	Retail analog	Disaggregation	Retail analog	Disaggregation
P-8: Provisioning Troubles within 30 Days of Service Order Completion	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP 2W Analog Loop Design 2W Analog Loop Non-Design - Dispatch - Non-Dispatch (Dispatch In) UNE Loop + Port Combos - Dispatch Out - Non-Dispatch - Dispatch In - Switch -Based UNE Switch Ports UNE Other Non-Design UNE Other Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Combination Other - Dispatch - Non-Dispatch (Dispatch-In) UNE xDSL (ADSL,HDSL,UCL) UNE Line Sharing UNE ISDN (Includes UDC) Local Interoffice Transport Local Interconnection Trunks Note: This measure is further disaggregated by circuit breakout: < 10 circuits and ≥ 10 circuits (except trunks).	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders) - Dispatch - Non-Dispatch (Dispatch In) Retail Res and Bus - Dispatch Out - Non-Dispatch - Dispatch In - Switch-Based Retail Res and Bus (POTS) Retail Res and Bus Retail Design Retail Digital Service < DS1 Retail Digital Service ≥ DS1 Retail Res, Bus & Design Dispatch (Incl. Dispatch In & Dispatch Out) - Dispatch - Non-Dispatch (Dispatch In) ADSL Provided to Retail ADSL Provided to Retail Retail ISDN – BRI Retail DS1/DS3 Interoffice Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) INP (Standalone) 2W Analog Loop Design 2W Analog Loop Non-Design - Dispatch - Non-Dispatch (Dispatch In) 2W Analog Loop w/INP Design 2W Analog Loop w/INP Non-Design - Dispatch - Non-Dispatch (Dispatch in) 2W Analog Loop w/LNP Design 2W Analog Loop w/LNP Non-Design - Dispatch - Non-Dispatch UNE Loop + Port Combos - Dispatch Out - Non-Dispatch - Dispatch In - Switch -Based UNE Switch Ports UNE Other Non-Design UNE Other Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Combination Other - Dispatch - Non-Dispatch (Dispatch-In) UNE xDSL (ADSL,HDSL,UCL) UNE Line Sharing UNE ISDN (Includes UDC) Local Interoffice Transport Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus (POTS Retail Res and Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders) - Dispatch - Non-Dispatch (Dispatch In) Retail Res & Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders - Dispatch - Non-Dispatch (Dispatch In) Retail Res & Bus Dispatch Retail Res and Bus – (POTS-Excluding Switch-based Orders) - Dispatch - Non-Dispatch Retail Res and Bus - Dispatch Out - Non-Dispatch - Dispatch In - Switch-Based Retail Res and Bus (POTS) Retail Res & Bus Retail Design Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res, Bus & Design Dispatch - Dispatch - Non-Dispatch (Dispatch In) ADSL provided to Retail ADSL Provided to Retail Retail ISDN – BRI Retail DS1/DS3 Interoffice Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2W Analog Loop Design 2W Analog Loop Non-Design - Dispatch - Non-Dispatch (Dispatch In) 2W Analog Loop w/LNP Design 2W Analog Loop w/LNP Non-Design - Dispatch - Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combos - Dispatch Out - Non-Dispatch - Dispatch In - Switch -Based UNE Switch Ports UNE Other Non-Design UNE Other Design UNE Combo Other - Dispatch - Non-Dispatch (Dispatch-In) UNE ISDN (Includes UDC) UNE xDSL (ADSL,HDSL,UCL) UNE Line Sharing UNE Line Splitting EELs Local Interoffice Transport Local Interconnection Trunks

Analysis of Proposed/Ordered SQM Retail Analogs

Tennessee Measurement	Level of Disaggregation and Associated Retail Analogs Proposed by BellSouth for Tennessee		Level of Disaggregation and Associated Retail Analogs Ordered By Georgia Commission		Level of Disaggr Retail Analogs I Commission St
	Disaggregation	Retail analog	Disaggregation	Retail analog	Disaggregation
	Resale Residence	Retail Residence	Resale Residence	Retail Residence	Resale Residence
	Resale Business	Retail Business	Resale Business	Retail Business	Resale Business
M&R-1: Missed Repair Appointments	Resale Design	Retail Design	Resale Design	Retail Design	Resale Design
	Resale PBX	Retail PBX	Resale PBX	Retail PBX	Resale PBX
	Resale Centrex	Retail Centrex	Resale Centrex	Retail Centrex	Resale Centrex
	Resale ISDN	Retail ISDN	Resale ISDN	Retail ISDN	Resale ISDN
M&R-2: Customer Trouble Report Rate	2W Analog Loop Design	Retail Res and Bus Dispatch	LNP (Not Available in Mtce)	LNP (Not Applicable)	2W Analog Loop Design
	2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Feature Troubles)	2W Analog Loop Design	Retail Res and Bus Dispatch	2W Analog Loop Non-Design
M&R-3: Maintenance Average Duration			2W Analog Loop Non-Design	Retail Res and Bus – (POTS-Excluding Switch-based Feature Troubles)	
	UNE Loop + Port Combos	Retail Res and Bus		Retail Res and Bus	UNE Loop + Port Combos
	UNE Switch Ports	Retail Res and Bus (POTS)	UNE Loop + Port Combos	Retail Res and Bus (POTS)	UNE Switch Ports
M&R-4: Percent Repeat Troubles Within 30 Days	UNE Other Design	Retail Design	UNE Switch Ports	Retail Res and Bus	UNE Digital Loop < DS1
	UNE Other Non-Design	Retail Res and Bus	UNE Other Non-Design	Retail Design	UNE Digital Loop ≥ DS1
	UNE Digital Loop < DS1	Retail Digital Service < DS1	UNE Other Design	Retail Res, Bus & Design Dispatch	UNE Combination Other
	UNE Digital Loop ≥ DS1	Retail Digital Service ≥ DS1	UNE Combination Other	ADSL Provided to Retail	UNE xDSL (ADSL,HDSL,UCL)
M&R-5: Out of Service (OOS) > 24 Hours	UNE Combination Other	Retail Res, Bus & Design Dispatch	UNE xDSL (ADSL,HDSL,UCL)	ADSL Provided to Retail	UNE Line Sharing
	UNE xDSL (ADSL,HDSL,UCL)	ADSL Provided to Retail	UNE Line Sharing	Retail ISDN – BRI	UNE ISDN
	UNE Line Sharing	Retail ISDN – BRI	UNE ISDN	Retail DS1/DS3 Interoffice	Local Interoffice Transport
	UNE ISDN	Retail DS1/DS3 Interoffice	Local Interoffice Transport	Parity with Retail	Local Interconnection Trunks
	Local Interoffice Transport	Parity with Retail	Local Interconnection Trunks		
	Local Interconnection Trunks				

Notes:

(1) Only provisioning and maintenance & repair measures that use general product disaggregations and associated retail analogs are reflected in this chart. M other standards or non-product based disaggregations are shown in Attachment 1.

(2) Where the disaggregation for Georgia and Florida is the same as the disaggregation proposed for Tennessee, the retail analogs are also the same. Therefo needed, to reflect a more stringent retail analog. The exception to this is measure P-4, Order Completion Interval (OCI), for xDSL proposed by the FPSC st an order completion interval of 5 days without conditioning and 12 days if conditioning is required for xDSL loops. This exception is noted in bold. Where th the Louisiana Commission is the same as that proposed in TN, the retail analogs are the same. Louisiana is not displayed above.

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2001, a copy of the foregoing document was served on the following parties, via the method indicated:

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