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February 25, 2005

VIA HAND DELIVERY

Hon Pat Miller, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth's Motion For The Establishment Of A New Performance Assurance Plan*
Docket 04-00150

Dear Chairman Miller.

Enclosed are the original and fourteen copies of Direct Testimony on behalf of BellSouth by Al Varner and Dr. Joseph Thomas. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2005, a copy of the foregoing document was served on the following, via hand delivery, facsimile, overnight, electronic mail or US Mail, addressed as follows:

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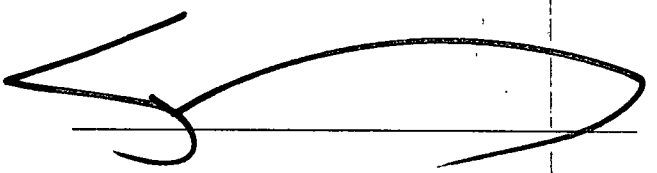

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF ALPHONSO J. VARNER

BEFORE THE TENNESSEE REGULATORY AUTHORITY

FILED FEBRUARY 25, 2005

DOCKET NO. 04-00150

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS ADDRESS.

A. My name is Alphonso J. Varner. I am employed by BellSouth as Assistant Vice President in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Florida State University in 1972 with a Bachelor of Engineering Science degree in systems design engineering. I immediately joined Southern Bell in the division of revenues organization with the responsibility for preparation of all Florida investment separations studies for division of revenues and for reviewing interstate settlements. Subsequently, I accepted an assignment in the rates and tariffs organization with responsibilities for administering selected rates and tariffs including preparation of tariff filings. In January 1994, I was appointed Senior Director of Pricing for the nine-state region. I was named Senior Director for

Regulatory Policy and Planning in August 1994. In April 1997, I was named Senior Director of Regulatory for the nine-state BellSouth region. I accepted my current position in March 2001.

I. INTRODUCTION

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my Testimony, in brief, is to:

- Demonstrate that BellSouth has continued to provide nondiscriminatory performance to competitive local exchange carriers and resellers ("CLECs") since receiving in-region interLATA long distance authority in Tennessee, *i.e.*, there has been no backsliding. Backsliding can be said to occur if a BOC is providing a level of service that is inconsistent with "maintaining conditions conducive to achieving durable competition in local markets." (*See* Bell Atlantic New York Order ¶ 446, *infra*). Moreover, Section 271(d)(6)(A) of the Telecommunications Act of 1996 ("the Act") provides for enforcement actions by the FCC if it is shown that a BOC, after receiving Section 271 approval, "has ceased to meet any of the conditions required for approval";
- Explain why the existing Tennessee Performance Assurance Plan ("Tennessee Plan" or "Current Plan"), has proven to operate in an impractical, inefficient, and overly punitive manner – therefore, the plan should be revised;
- Reiterate the key criteria for effective Service Quality Measurements ("SQM") and Self-Effectuating Enforcement Mechanisms ("SEEM"). I also discuss the lessons learned as a result of actual experience with the plan that

will increase the likelihood of designing a plan that meets these criteria;

- Describe how BellSouth's proposed changes to the SQM and SEEM still produce a plan that meet the key criteria for an appropriate performance monitoring (SQM) and enforcement plan (SEEM), and does so in a more efficient and practical manner than the existing plan.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. My testimony is organized in the following way:

- Section I is the Introduction that includes the purpose, organization and summary of the testimony.
- Section II provides a discussion of the appropriate criteria that should be used in adopting a Performance Assurance Plan for Tennessee.
- Section III shows that BellSouth has continued to provide nondiscriminatory performance under the Current Plan since receiving Section 271 approval from the Federal Communications Commission ("FCC"); that is, BellSouth continues to perform at a level that earned long distance authority (no backsliding). A review of the growth in local competition since the grant to BellSouth of interLATA in-region long distance authority further confirms this fact.
- Section IV highlights the generic problems with a measure-based penalty plan and provides the rationale for why penalties calculated under the Tennessee SEEM plan should be transaction-based rather than measurement-based.
- Section V includes a discussion of the problems that developed as a result of the initial design of the Current Plan, with emphasis on the fact that there are

too many measurements and too much disaggregation.

- Section VI outlines BellSouth's proposed changes to the existing Tennessee SQM. The proposed SQM is attached as Exhibit AJV-1. A matrix containing the rationale for each proposed change to the SQM is included as Exhibit AJV-2. This section of my testimony also describes BellSouth's proposed changes to the current Tennessee SEEM. The proposed SEEM Plan is attached as Exhibit AJV-3 and the rationale for each proposed change to the SEEM Plan is contained in a matrix attached as Exhibit AJV-4.
- Section VII demonstrates that BellSouth's proposed modified plan meets the requirements of an appropriate performance assurance plan better than the Current Plan and why the Tennessee Regulatory Authority ("Authority" or "TRA") should adopt BellSouth's proposal.

Q. FOR CONVENIENCE, BEFORE PROCEEDING WITH YOUR TESTIMONY WOULD YOU EXPLAIN SOME OF THE KEY TERMS THAT YOU WILL BE USING IN YOUR TESTIMONY?

A. Certainly. Throughout my testimony, certain key terms that have unique meaning in the context of performance plans are used repeatedly. For the Authority's convenience, some of these terms are explained in the following discussion. The Current Plan consists of two parts, namely, the "Service Quality Measurement Plan" (also called the "SQM") and the "Self-Effectuating Enforcement Mechanism Plan" (also called "SEEM"). The "SQM" part of the Current Plan specifies the method for calculating data and the standard, if one exists, that BellSouth's performance, reflected in that data, should meet. Pursuant to the

instructions within the SQM, data is reported on many different functions that BellSouth performs for CLECs. Each unique function is identified as a measure in the SQM part of the Current Plan, and there are 76 such measures. The term "SQM measure" refers to one or more of these 76 measures.

For instance, "Missed Installation Appointments" is an example of a function measured under the SQM and there is a performance standard set for the percentage of Missed Installation Appointments that BellSouth may have in one month before a penalty would result. For each of the 76 SQM measures, however, data is not typically reported on a consolidated basis for all instances in which BellSouth performs that task (in this example, "installation appointments"). Instead, the data is reported ***separately*** for many individual subgroups of activity within a measure. The process for establishing these subgroups is called "disaggregation," and the description of each is identified within that SQM measure.

With full disaggregation, dividing these items into different subgroups by, for example, products, dispatch type, and volume, these 76 SQM measures "balloon" into approximately 2,162 actual "data points." Each of these data points is referred to either as a sub-metric or a measurement. For example, one sub-metric for "Missed Installations" is "Percent Missed Installation Appointments for Loop/Port Combinations on orders with less than 10 circuits where a technician was dispatched to the CLEC customer's premises." Moreover, in most cases, data is reported for both the aggregate of all CLECs and for each CLEC individually. Consequently, the actual amount of data reported is enormous.

SEEM penalties are determined separately for individual groupings of those SQM sub-metrics where penalties apply. Penalties do not apply to every transaction recorded on each SQM sub-metric. For example, some SQMs are solely "diagnostic" or "informational," and are tracked and reported even though there is no performance standard or penalty associated with the function being measured. Also, many SQM sub-metrics monitor activities that do not have a significant impact on a CLEC's ability to compete, and consequently no penalties apply to these sub-metrics. The individual groupings of SQM sub-metrics for which penalties apply are referred to as SEEM measures or sub-metrics, and there are 830 such SEEM measures or sub-metrics in the Current Plan. Not all SQM measures have penalties associated with such measures. Accordingly, the number of SEEM sub-metrics is less than the number of SQM sub-metrics.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. The primary points made and positions contained in my testimony may be summarized as follows:

- BellSouth's experience demonstrates that a measurement-based plan, like the current Tennessee Plan, produces large irrational penalties even when BellSouth's service is as good as, or even better than, the day BellSouth obtained the TRA's support for Section 271 relief.[1] ***When a plan, designed principally, if not solely, to prevent backsliding, substantially penalizes the same continued nondiscriminatory performance, something is very wrong with the plan.*** BellSouth is still providing that same level of performance, and sometimes even

[1] The Authority supported and the FCC approved BellSouth's request for Section 271 relief, based in part on finding that Bellsouth met its Section 251(c) obligations to provide nondiscriminatory unbundled access, interconnection and resale.

better performance, and yet the Current Plan is generating inordinately large performance penalties (averaging over $1 Million per month) even as BellSouth maintains its performance. This clearly points to significant structural problems in the Current Plan and not to a problem in performance.

- BellSouth believes that the overarching goal for the TRA in this docket is the establishment of a plan that accomplishes the objectives of monitoring and enforcement as effectively and efficiently as possible. Consequently, the SQM and SEEM plans that the Authority ultimately adopts in this proceeding should exhibit the five key characteristics of an effective enforcement plan, as stated by the FCC. The five key FCC criteria are:

    1. potential liability that provides a meaningful and significant incentive to comply with the designated performance standards;
    2. clearly-articulated, pre-determined measures and standards, which encompass a comprehensive range of carrier-to-carrier performance;
    3. a reasonable structure that is designed to detect and sanction poor performance when it occurs;
    4. a self-executing mechanism that does not leave the door open unreasonably to litigation and appeal; and,
    5. reasonable assurances that the reported data is accurate.

- BellSouth's proposed SQM and SEEM plans meet all of the key criteria of an effective plan as identified by the FCC. As you can see, these characteristics are very broad. However, experience has provided us with some more specific criteria to ensure that the first three characteristics are met, which are as follows:

    a. The plan should not generate high penalties for nondiscriminatory

performance.

b. The plan should not be so excessive, impractical or unreasonable as to promote uneconomic behavior to meet the demands of the wholesale requirements;

c. The penalty assessment under SEEM should be proportionate to the degree of failure;

d. The plan should minimize the extent to which the same transactions or occurrences are captured in multiple measures (i.e., duplication and overlap), especially where penalties apply.

e. The measurement plan scope should be optimized to focus only on key customer impacting measurement processes, and not on the measurement of non-critical or secondary processes.

- BellSouth's performance demonstrates that it is not backsliding from the level of performance when BellSouth received approval from the FCC to provide long distance service in Tennessee. In fact, BellSouth's performance has improved since receiving long distance approval. More importantly, competition is thriving in Tennessee with the percentage of total local lines served by CLECs in BellSouth's Tennessee territory growing from 10.4% in May 2001 to 24% in December 2004. Moreover, if we look at the business sector of the local market, which is the main focus area of the CLECs, the CLECs market share in BellSouth's Tennessee territory went from 29.2% in May 2001 to 46% in December 2004.
- Notwithstanding BellSouth's nondiscriminatory wholesale performance, under the Current Plan, BellSouth pays substantial penalties (**approximately $14 million for the period January through December 2004 in Tennessee).** This

disconnect - in which good performance results in a large penalty – shows that, the Current Plan goes vastly beyond what is needed to effectively monitor performance and help deter backsliding.

- With respect to the SEEM plan, BellSouth proposes adopting a transactions-based remedy calculation approach to replace the current measure-based remedy calculation, modifying the current fee schedule, reducing the number of sub-measures included in the plan, modifying the method of determining materiality and some administrative changes. The statistical test for determining whether BellSouth passes or fails a metric that is currently used will remain the same, as will most of the internal processes used to produce penalties. The aim of BellSouth's proposed changes is to install a more rational enforcement plan design that better aligns the penalties paid with the level of performance. These changes will serve to re-calibrate the SEEM plan when performance is good while still providing an incentive to prevent backsliding that is better than the current incentive.
- Based on BellSouth's experience and actual data, the current Tennessee SQM contains too many measures (*i.e.* measures that serve no useful purpose) and too much disaggregation. The result of this excessive disaggregation is a large percentage of sub-metrics with little or no activity. The existence of a large number of sub-metrics with little or no activity makes the reported results for these sub-metrics statistically inconclusive and consumes resources that are largely wasted. Measuring this many activities – and portions of activities – creates an unmanageable and statistically unhelpful mountain of data.
- There is a mismatch between the level of performance and penalties paid under the Tennessee SEEM – large penalties are paid for high levels of performance. In

particular, notwithstanding BellSouth's continued nondiscriminatory performance (and even improved performance) since its initial Section 271 filing with this Authority and since the FCC's grant of long distance authority in Tennessee, BellSouth is paying larger penalties under the current Tennessee SEEM plan for performance that has already been adjudged by this Authority and the FCC as nondiscriminatory performance.

- At the time of the state 271 filing (March 2001 data), BellSouth's "overall performance" level in Tennessee, that is, the number of the then-applicable measures (retail analogue or benchmark) containing a statistically significant level of activity that BellSouth was meeting was 78%. In September 2002, when BellSouth applied to the FCC for a grant of Section 271 authority in Tennessee, BellSouth submitted data indicating its performance based on the then-applicable (Georgia) metrics (and submetrics) containing a statistically significant level of activity for the three-month period of May through July 2002. BellSouth's performance during that period averaged 82.6% when evaluated with the current reporting structure[2] and with the measurement plan that was in effect at that time.
- BellSouth's current performance for the period January through December 2004 is 86%. Arguably, given that BellSouth's current performance is above what the FCC determined to be nondiscriminatory, BellSouth should not be paying <u>any</u> penalties. However, BellSouth is only proposing in this proceeding that the penalty plan derive from a more rational basis.
- In accordance with the foregoing considerations, BellSouth recommends that the Authority adopt the BellSouth proposal to streamline the existing Tennessee SQM

[2] Starting in November 2003, BellSouth commenced reporting performance results in a format that is slightly different than the reporting structure used during the 271 application process. BellSouth now reports its performance using the Single Reporting Structure (SRS) format. The impact of the revised format is minor.

to make it more efficient, practical and useful to the Authority and CLECs alike. Streamlining would involve significantly reducing the degree that multiple measures address the same process as well as eliminating non-critical measures, changing some of the details of how the measurements are calculated, reducing the level of disaggregation, and some modifications to standards. This streamlining would actually improve the utility of the SQM as a tool for monitoring BellSouth's performance.

II. APPROPRIATE CRITERIA FOR CHOOSING PERMANENT SQM AND SEEM PLANS.

Q. IS BELLSOUTH REQUIRED TO HAVE A PERMANENT SQM AND SEEM PLAN?

A. No. There is nothing in the Act that requires a Bell operating company ("BOC") to establish performance and enforcement plans. However, as a practice, states have such plans. The FCC considered such plans as useful evidence in its public interest analysis and in making its determination that a BOC is providing access to CLECs in a nondiscriminatory manner. Specifically, in its *BellSouth Florida and Tennessee Order ¶ 167(infra)*, the FCC clarifies:

> In prior orders, the Commission has explained that one factor it may consider as part of its public interest analysis is whether a

BOC would have adequate incentives to continue to satisfy the requirements of section 271 after entering the long distance market. Although it is not a requirement for section 271 authority that a BOC be subject to such performance assurance mechanisms, the Commission previously has found the existence of a satisfactory performance monitoring and enforcement mechanism is probative evidence that the BOC will continue to meet its section 271 obligations after a grant of such authority.

Q. WHAT IS THE PURPOSE OF A PERFORMANCE MONITORING AND ENFORCEMENT PLAN?

A. The ultimate goal of the Telecommunications Act of 1996 ("Act") is of course to open the local market to competition. In states that choose to use a performance and enforcement plan, the purpose of the plan, in support of this goal, is to provide performance monitoring capability with an associated enforcement mechanism that will be sufficient to prevent backsliding after a BOC, like BellSouth, obtains InterLATA relief in a given state such as Tennessee. Performance monitoring examines a BOC's performance to determine whether that performance is meeting the three overall performance criteria as defined by the FCC. These standards are set forth in the Act and in the pertinent FCC Orders. Those performance criteria are:

1. BellSouth must provide access to CLECs in **"substantially the same time and manner"** that it provides similar services to itself.[3] This is the "parity"

[3] See, for example, Para 44 of CC Docket 99-295. *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in*

standard that relates to measurements and processes in situations in which the wholesale function provided to the CLEC has an equivalent BellSouth retail function.

2. BellSouth must render access to CLECs that **"provides an efficient competitor a meaningful opportunity to compete."**[4] This standard applies in situations in which the wholesale function has no equivalent BellSouth retail function. In this case a benchmark is used.
3. BellSouth provides interconnection to the CLECs that is **"equal in quality"** to what BellSouth provides to itself.[5] This standard applies specifically to interconnection trunking.

Q. HOW CAN THE AUTHORITY ENSURE THAT IT IS ADOPTING AN APPROPRIATE PERFORMANCE ASSURANCE PLAN FOR USE IN TENNESSEE?

A. The issue of adopting an appropriate performance assurance plan, *i.e.*, SQM and SEEM plans, in Tennessee is best addressed by defining the necessary criteria for an effective performance monitoring and enforcement plan and improving the existing Tennessee plan to meet these criteria.

As already noted, the FCC established that the purpose of an enforcement plan is to provide BOCs with an additional incentive to avoid backsliding. Specifically, the FCC identified five characteristics of an effective plan in its Bell Atlantic New

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the State of New York, CC Docket 99-295, Memorandum Opinion and Order, 15 FCC Rcd 2953 (1999) (*"Bell Atlantic New York Order"*), *aff'd sub nom. AT&T v. FCC,* 220 F.3d 607 (D.C. Cir. 2000).

[4] *Id*.

[5] *Id*. at ¶ 63.

York *Memorandum Opinion and Order,*[6] which it affirmed in later opinions. In that order the FCC stated:

> Where, as here, a BOC relies on performance monitoring and enforcement mechanisms to provide assurance that it will continue to maintain market-opening performance after receiving section 271 authorization, we will review the mechanisms involved to ensure that they are likely to perform as promised. While the details of such mechanisms developed at the state level may vary widely, we believe that we should examine certain key aspects of these plans to determine whether they fall within a zone of reasonableness, and are likely to provide incentives that are sufficient to foster post-entry checklist compliance. In this instance, we believe that the enforcement mechanisms developed in New York will be effective in practice. We base this predictive judgment on the fact that the plan has the following important characteristics:
>
> - potential liability that provides a meaningful and significant incentive to comply with the designated performance standards;
> - clearly-articulated, pre-determined measures and standards, which encompass a comprehensive range of carrier-to-carrier performance;
> - a reasonable structure that is designed to detect and sanction poor performance when it occurs;
> - a self-executing mechanism that does not leave the door open unreasonably to litigation and appeal; and,

[6] Id. at ¶ 433.

- reasonable assurances that the reported data is accurate.

Q. HOW SHOULD THE FCC's PRINCIPLES OF AN EFFECTIVE PLAN BE APPLIED IN DESIGNING AN APPROPRIATE PERFORMANCE ASSURANCE PLAN?

A. BellSouth believes that in applying the FCC's characteristics of an effective performance plan for purposes of adopting an appropriate plan in Tennessee, the Authority should also take into considerations the following practical principles;

- The plan should not be so excessive, impractical or unreasonable as to promote uneconomic behavior to meet the demands of the wholesale requirements;
- The penalty assessment under SEEM should be proportionate to the level of failure so as not to be so onerous that it creates a new line of business for CLECs;
- The measurement plan scope should be optimized to focus only on key customer impacting measurement processes, and not on the measurement of non-critical or secondary processes.

The existing Tennessee Plan does not adequately incorporate the aforementioned practical aspects. In certain respects, this should not be surprising as the Tennessee Plan was implemented at a time when there was little experience with the practical aspects of a performance assurance plan and significantly less CLEC activity to monitor. That said, while the current plan has served its purpose as an initial mechanism to monitor performance and prevent deterioration of

performance, it is both inefficient and excessive.

Q. WHY NOT HAVE THE PLAN ADDRESS MORE THAN BACKSLIDING – WHY NOT A PLAN THAT PENALIZES BELLSOUTH FOR NOT IMPROVING?

A. The principal reason is that a plan designed not only to prevent backsliding, but also to penalize BOCs like BellSouth for not improving far exceeds the role such plans need to perform to accomplish the goals of the Act. Not only would such an approach be tantamount to re-litigating the 271 case, and the interpretations of the Act provided by the FCC, but it would represent an artificial force operating in the marketplace, reallocating assets, in the form of penalty payments to CLECs, without any basis for doing so.

If the Authority wants to encourage improvement in performance by BellSouth beyond the nondiscriminatory level required by the Act, it would be more practical and effective to offer rewards for improvement rather than sanctions for not improving. This is because penalties assessed against BellSouth for not improving performance, which is already compliant, could encourage sacrificing retail service so that resources would be available to ensure high levels of wholesale service. This would be counterproductive since the intended beneficiary of the Act is ultimately the consumer or end user and not the CLECs.

III. THERE IS NO BACKSLIDING SINCE 271 APPROVAL.

Q. YOU INDICATED THAT THE PURPOSE OF THE PERFORMANCE MONITORING AND ENFORCEMENT MECHANISMS IS TO PREVENT BACKSLIDING AFTER 271 RELIEF IS GRANTED. PLEASE COMMENT ON BELLSOUTH'S CURRENT PERFORMANCE.

A. As previously stated, at the time of the state 271 filing (March 2001 data), BellSouth's "overall performance" in Tennessee, as measured by the number of then-applicable measures BellSouth was meeting, was 78%. In September 2002, when BellSouth applied to the FCC for a grant of Section 271 authority in Tennessee, BellSouth submitted data indicating its performance level based on the then-applicable (Georgia) metrics (and submetrics) for the three-month period of May through July 2002. BellSouth's performance during that period averaged 82.6% when evaluated with the current reporting structure and with the measurement plan that was in effect during that period.

BellSouth's current performance for the period January through December 2004 is 86%. This level of performance clearly demonstrates an absence of backsliding since BellSouth received Section 271 approval. Moreover, the FCC relied on such data (and other information) in determining that: (i) the Tennessee local market was open; (ii) BellSouth had met the competitive checklist requirements of Section 271(c)(2)(B) of the Act; and (iii) that BellSouth's entry into the long distance market was in the public interest.[7] ***Consequently, performance consistent with that demonstrated to the TRA in August, 2002 and to the FCC***

[7] *In the Matter of Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Authorization To Provide In-Region, InterLATA Services in Florida and Tennessee,* WC-Docket No. 02-307, Memorandum Opinion and Order, at ¶ 165 ("BellSouth Florida and Tennessee Order").

in September 2002, is the performance level the Plan should be designed to maintain. Maintaining that performance level – not perfection – is the proper aim of the Plan. BellSouth is not backsliding in Tennessee. In fact, BellSouth is not backsliding anywhere in its region.

Q. YOU STATED THAT THE ULTIMATE GOAL OF THE ACT IS TO OPEN THE LOCAL MARKET TO COMPETITION. WHAT IS THE CURRENT STATE OF LOCAL COMPETITION IN TENNESSEE?

A. If one looks at the competitive facts that pertain to Tennessee, it is clear that the CLECs in Tennessee are being provided a meaningful opportunity to compete and consequently competition is thriving. Moreover, new competitors, including voice over internet protocol ("VOIP") providers, cable companies, and satellite based companies are now competing in the local telecommunications arena.

On July 30, 2001, BellSouth filed Tennessee competitive data results for May 2001 with this Authority in Docket No. 97-00309 as part of the 271 proceeding. (*See* Affidavit of Douglas E. Schaller, on behalf of BellSouth Telecommunications Inc. at 10.) In particular, when BellSouth initially filed competitive local market share data with the Authority on July 30, 2001, CLECs operating in BellSouth's territory served 10.4% of the total lines and 29.2% of business lines in Tennessee, based on May 2001 data. In comparison, based on December 2004 data, the CLECs operating in BellSouth's Tennessee territory served 24% of total lines and 46% of the business lines. It is critical to note that these percentages do not reflect the existence of intermodal competition. The

inclusion of these intermodal alternatives in the market share analysis would demonstrate that competition is significantly more substantial than the current analysis reflects.

In any event, this level of local competition clearly demonstrates that BellSouth is not impeding CLECs' ability to compete in Tennessee. In short, increased local competition is compelling, and arguably conclusive, evidence that BellSouth is not backsliding and, at the very least, that more stringent standards are not necessary. Moreover, as will be discussed later, the Current Plan represents an initial approach that emphasized an overabundance of caution on the part of BellSouth, the CLECs and the Authority in assuring future compliance. Consequently, the existing plan should be reformed to address problems with the plan that have been recognized after several years of experience with the plan.

Q. BEFORE DISCUSSING THE PROBLEMS THAT YOU HAVE IDENTIFIED WITH THE CURRENT PLAN WOULD YOU PROVIDE SOME BACKGROUND CONCERNING ITS DEVELOPMENT?

A. BellSouth has performance assessment plans in all nine states in BellSouth's region, each of which was implemented in connection with BellSouth's petitions for 271 relief. These plans, developed in the context of the 271 cases, each have one goal. That goal is simple: to ensure that BellSouth continues, after successfully obtaining in-region long distance authority pursuant to Section 271, to satisfy its obligations under Section 251(c) of the Act; that is to provide nondiscriminatory unbundled access, interconnection, and resale to CLECs.

Accordingly, the goal is to ensure that BellSouth's performance does not deteriorate to a level materially below the level that BellSouth demonstrated to both state commissions and to the FCC at the time of its petitions – the level that those commissions and the FCC deemed satisfactory for Section 271 relief.

These existing performance assurance plans are related to BellSouth's wholesale practices. They are not service quality rules for end-user customers. Instead of focusing on end user service issues, these plans deal with nondiscrimination (also referred to as parity): That is, they focus on whether BellSouth discriminates between its retail customers and CLECs when it provides local service.
At the time these plans were originally fashioned, the goal of such plans was clear, but the processes and mechanics for achieving that goal were not. Instead, such plans were new, untested and adopted without the benefit of practical experience as to whether they would, in actual practice, achieve the goal of preventing "backsliding". In fact, both state commissions and the FCC understood and acknowledged that these plans would ***need to be*** revised, modified and "tuned" to real world experiences. Moreover, as the TRA recognized during its Section 271 deliberations, these Plans were not required as a precondition to obtaining Section 271 relief. Nonetheless, such Plans were a common feature of successful Section 271 cases because they provided additional assurance that, well after the "carrot" of 271 relief had been given, the BOC would still have an ongoing and specific incentive to keep up the same level of good performance that had won the state regulators' support for 271 relief.

Beginning in February 2001, the Authority opened a docket with the stated intent of developing a common set of performance measurements, benchmarks, and enforcement mechanisms to ensure that BellSouth provided non-discriminatory access to its network elements as required by the Act.[8] Later, when the Authority was called upon to consider Section 271 relief, the Authority divided several aspects of the 271 case into separate dockets. At that point, Docket No. 97-00309 was designated as the docket in which to evaluate the 271 requirement that BellSouth provide nondiscriminatory access to its network as required under Section 251.

On several occasions during the 271 case in Tennessee BellSouth requested that the Authority adopt the transaction-based performance measurements, benchmarks, and enforcement mechanisms established by the Georgia Public Service Commission ("Georgia Plan"). The CLEC Coalition opposed BellSouth's request and proposed its own plan. Wrangling between the parties over a performance plan continued for some time, and numerous objections were raised – by both sides – at every turn. It was during these ongoing disputes that the present TRA Directors began their tenures in the summer of 2002. In the midst of the continuing legal disputes over the TRA's efforts to craft a plan and other 271 issues, the Authority suggested that the parties consider mediation of issues in the 271 case, as a way to resolve the issues more quickly.

This development was unique to Tennessee and on the eve of 271 hearings scheduled at the TRA, the parties approached the Authority with a proposed

[8] TRA Docket No. 00-00392, *BellSouth Telecommunications, Inc.'s Petition to Convene Generic Docket and to Resolve Pending Arbitration Issues*, filed May 16, 2000.

settlement agreement. As part of that settlement proposal, the parties agreed to forego any further efforts to craft a Tennessee-specific performance plan and to use instead – for a limited time – the plan adopted by the Florida Commission in the Florida 271 proceedings.

In the *Settlement Approval Order* issued in the 271 case, the Authority approved the parties' proposed settlement and adopted for use in Tennessee the performance assessment plan then in effect in Florida ("Florida Plan") until December 1, 2003.[9] The parties' settlement permitted BellSouth to transition to the Florida Plan on December 1, 2002, after first operating under the Georgia Plan (with Tennessee data) during the intervening four months. The *Settlement Approval Order* further provides that after December 1, 2003, any party may request the Authority to "conduct a review of the then-existing plan, accept recommendations from interested parties, and make any appropriate modifications."[10] As ordered, BellSouth has operated under the Current Plan since December 1, 2002, while developing its Proposed Plan, pursuant to that provision of the *Settlement Approval Order* permitting BellSouth to seek a new plan.

Out of an abundance of caution, the Current Plan incorporated measurements of nearly every conceivable activity that could potentially have an impact on a CLEC's meaningful opportunity to compete. BellSouth has since learned a great

[9] *Settlement Approval Order* at p. 10 (ordering that "[t]he service quality measurement plan and self-effectuating mechanisms adopted by the Florida Public Service Commission . . . as they exist today and as they may be modified in the future, are hereby adopted . . . and [shall] remain in effect, at a minimum, until December 1, 2003.")

[10] *Id.; see also Id* at p. 7 (noting that "[t]he parties agreed not to seek amendments to the plan until December 1, 2003, after which the TRA in its discretion may conduct a review of the plan and the parties are free to recommend modifications.")

deal about the practical process of using performance assessment or assurance plans. BellSouth's experiences confirm the concerns BellSouth raised as these plans were developed in Florida and other states. Specifically, BellSouth's experience demonstrates that a measurement-based plan, like the Tennessee Plan, will produce large irrational penalties even when BellSouth's service is as good as, or even better than, the day BellSouth obtained the TRA's support for Section 271 relief.[11] ***When a plan designed principally, if not solely, to prevent backsliding, substantially penalizes the same continued nondiscriminatory performance, something is very wrong with the plan.*** BellSouth is still providing that same level of performance, and sometimes even better performance, and yet the Current Plan is generating inordinately large performance penalties (averaging over $1 Million per month) even as BellSouth maintains its performance. This clearly points to a problem with the Plan and not to a problem with BellSouth's performance.

Q. WHAT ARE THE MAJOR PROBLEMS WITH THE PLAN?

A. There are three major problems with the current Tennessee Plan. First, the current penalty calculation uses a measurement-based approach rather than a transaction-based approach. Second, there are too many measurements and sub-measurements in the plan. Third, the penalties paid under the plan are not commensurate with the performance provided to the CLECs, and, more importantly, with the potential harm to the CLEC.

[11] The Authority supported and the FCC approved BellSouth's request for Section 271 relief, based in part on finding that BellSouth met its Section 251(c) obligations to provide nondiscriminatory unbundled access, interconnection and resale.

IV. THE PENALTY CALCULATION METHODOLOGY UNDER THE CURRENT SEEM PLAN SHOULD BE CHANGED.

THE SEEM PLAN SHOULD BE TRANSACTION-BASED RATHER THAN MEASUREMENT-BASED

Q. PLEASE EXPLAIN WHY THE CURRENT PENALTY CALCULATION APPROACH IS INAPPROPRIATE.

A. Under the current Tennessee SEEM plan, penalty calculations are determined on a per measurement basis (measurement-based plan) rather than a per transaction basis (transaction-based plan). I will explain why a transaction-based approach is both preferable to and more effective than a measurement-based plan. One of the many problems with a measurement-based plan is that it is not scalable. Specifically, a per-measure penalty plan, like the current Tennessee and Florida SEEM plans, assesses the same penalty amount whether there is 1 failed transaction or 1000. Consequently, the measurement-based plan imposes a high penalty on the "first offense" of missing a measurement, rather than a lower threshold penalty, which would be compounded depending on whether BellSouth continues to miss a measurement standard. This is especially problematic when applied to Tier 1 payments. Tier 1 payments are aimed at addressing impact to individual CLECs.

A penalty calculation methodology that compensates a CLEC that experiences poor performance on 1 transaction the same as a CLEC that experiences poor

performance on 1000 transactions is intuitively flawed. This is in contrast to a transaction-based approach, where the penalty increases directly in proportion to growth in the number of transactions where performance is substandard, and is used in seven of BellSouth's nine states. Penalty calculations in a transaction-based plan are straightforward. Once disparate performance is identified, a penalty amount is calculated by multiplying the number of disparate transactions times the appropriate fee. Further, aside from the fact that a transaction-based plan is preferable as a general proposition, from a practical standpoint, history has demonstrated the inherent difficulty of attempting to modify a measurement-based plan to account for the level of disparity between CLEC and retail performance (for measures with retail analogues) or to account for differences between actual performance and desired performance (for measures with a benchmark). Certainly, instead of attempting to recalibrate a flawed approach, the Authority would be better served by adopting a scalable, transaction-based remedy calculation approach.

Q. HOW PREVALENT IS THE USE OF TRANSACTION-BASED PLANS AMONG THE STATES THROUGHOUT THE COUNTRY?

A. Currently, at least 40 states[12] use transaction-based plans for Section 271 enforcement purposes. Also, several other states have adopted transaction-based plans for other enforcement purposes (*e.g.,* as part of conditions for mergers).

[12] The following states have adopted enforcement plans which are primarily transaction-based: Alabama, Arizona, Arkansas, Colorado, Connecticut, Delaware, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming. The state plans include RBOC plans for BellSouth, Qwest, SBC, and Verizon.

Consistent with this rational preference for transaction-based models, seven of the nine states in BellSouth's region use transaction-based plans. Only Florida and Tennessee in BellSouth's region use a measurement-based plan for Section 271 enforcement purposes. Consequently, moving to a transaction-based plan will put Tennessee in line with the majority of states in the country. Now that BellSouth has lived under both models, it is clear the transaction-based model works more logically and more fairly in achieving the FCC's goal of preventing backsliding after receiving interLATA authority. Accordingly, BellSouth urges the Authority to adopt a transaction-based model to replace the current measurement-based plan.

Also, it is important to keep in mind that the FCC has not mandated any particular penalty structure and has recognized that different plan structures can be equally effective. The FCC has also recognized that the development and implementation of performance measures and appropriate remedies is an evolutionary process that ***requires change to both measures and remedies over time.***[13] Consequently, moving to a transaction-based plan is in no way inconsistent with FCC precedent. In fact, transaction-based models are the mainstream model, being used in the vast majority of states that have performance plans.

Q. HOW VIABLE IS A MEASUREMENT-BASED PLAN AS A DETERRENT TO BACKSLIDING AS COMPARED TO A TRANSACTION-BASED PLAN?

A. A measurement-based model is simply inefficient as a deterrent to backsliding. Under the measurement-based model, once BellSouth misses the measurement in

[13] *In the Matter of Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Authorization To Provide In-Region, InterLATA Services in Florida and Tennessee,* WC-Docket No. 02-307, FCC 02-331, Memorandum Opinion and Order, ¶ 170 (2002)

the first instance, its efforts to quickly improve performance is largely irrelevant because the penalty paid is the same whether the measurement is missed by an inch or missed by a mile. In stark contrast, however, a transaction-based plan provides an incentive to do a good job on every task every time because, under such a model, the total penalty amount actually depends on the number of misses.

Under a transaction-based plan, BellSouth pays a penalty based on the number of transactions that miss the plan's performance standards. Accordingly, to the extent that BellSouth missed the performance standard by a large amount, the penalty amount increases. Therefore, in contrast to the measurement-based plan, the penalty for missing the performance standard, in the first instance, under a transaction-based plan need not be as substantial. This is because such penalties will increase as the standard is missed by a larger margin (*i.e.* the plan is scalable). In sum, because of the correlation between performance, transaction volume, and penalties paid for disparate performance, a transaction-based plan recognizes all performance improvements and is therefore a more efficient deterrent to backsliding.

TENNESSEE SHOULD NOT RETAIN A MEASUREMENT-BASED PLAN

Q. WHAT IS THE IMPACT OF CONTINUING A MEASUREMENT-BASED PLAN?

A. Because the Current Plan adopted by the Authority is measurement-based, one impact is that the plan is wrongly weighted in a fashion that produces large

penalties in areas where there is very little CLEC activity. That is to say, where CLEC volumes are small it is more likely that BellSouth will miss the performance standard by chance, not because its processes discriminate against CLECs. By corollary, when the penalty, a flat fee, is assessed via this measurement-based plan the amount is excessive when compared to the small volume involved.

For example, the current metric O-8, Reject Interval, measures how quickly BellSouth returns a notice to a CLEC that its Local Service Request ("LSR") has been rejected because of an error in the CLEC's request. The standard for this measurement requires that BellSouth return a reject notice 97% of the time within 1 hour. Thus, if CLEC A submits 30 LSRs that are rejected and BellSouth fails to return 2 reject notices within the 1-hour standard, this results in BellSouth missing the performance standard for the measure because the result is 93% (28 out of 30) against a benchmark of 97%. Likewise, if CLEC B submits 1000 LSRs that are rejected and BellSouth fails to return 70 of these reject notices within the 1-hour standard, BellSouth will miss the performance standard for the measure because the result is 93% (930 out of 1000) against a benchmark of 97%.

So, under the Current Plan, if this is the first month that BellSouth missed the performance standard for both CLEC A and CLEC B, BellSouth would pay CLEC A $450 (for 2 transactions outside of the 1-hour standard) and would pay the same amount, $450, to CLEC B (for 70 transactions outside the 1-hour standard). Thus, while with small volumes it is more likely that BellSouth will miss the performance standard due to chance instead of discrimination, regardless

of the reason, as shown in the example above, the penalty paid inordinately compensates the CLEC where the volumes are small. This is clearly a counter-intuitive result.

Q. WHAT ARE SOME CONTRIBUTING FACTORS TO THIS COUNTER-INTUITIVE RESULT?

A. One major contributing factor to this counter-intuitive result is the level of the fee schedule associated with the existing plan. Specifically, the current measurement-based fee schedule was actually derived from a transaction-based fee schedule, which resulted from evidence considered by the Georgia Public Service Commission in the year 2000, over four years ago. That fee schedule was developed at time when there was much less CLEC activity in the local market. Given the low level of CLEC activity at the time, there were some concerns that BellSouth's potential SEEM payment liability, based on a transaction-based approach, could be too low to be an effective deterrent against backsliding.

At least in part, to compensate for the overall low level of CLEC activity at the time, the resulting per-transaction fee schedule was set artificially high. Thus, the measurement-based fee schedule, which was derived from the initial transaction-based plan, was also artificially high. In fact, the penalties under a measurement-based plan, such as the current Tennessee plan, are even more excessive, as will be discussed later, often resulting in inordinately large penalties where there is little CLEC activity.

This problem (*i.e.* large penalties when there is little CLEC activity) is compounded by the fact that, at the time when the plan was developed, the view was that measurements had to be much more granular than experience now shows to be necessary. The problem of excessive granularity of the plan metrics will be discussed in more detail later with respect to measurement disaggregation. But, for now, suffice it to say that this change in circumstances and additional knowledge gained from actual use of the plan calls for a change in the Current Plan's model, namely, a change to a transaction-based approach.

Q. LOOKING AT OVERALL PENALTY PAYMENTS, HOW DO STATES WITH TRANSACTION-BASED PLANS WITHIN BELLSOUTH'S REGION COMPARE TO STATES WITH MEASUREMENT-BASED PLANS?

A. Within BellSouth's region, the two states (Florida and Tennessee) that adopted a measurement-based plan generate the highest penalties by far. In fact, the SEEM payments in Tennessee are the highest on a per-CLEC-line-in-service basis of any state within the BellSouth region. Exhibit AJV-5 illustrates this point and is a chart displaying the relationship between the average monthly SEEM payment per 1000 CLEC lines in service for each state in BellSouth's region, during the period January through December 2004. By dividing the monthly SEEM payments in each state by the CLEC lines in service, each state's SEEM payments can be compared on a common basis. The chart shows just how out of line Tennessee's Plan is with other states.

Of course, any regulator considering this information would want to know whether BellSouth's performance is the culprit. Specifically, are the high Tennessee SEEM payments an indication that Tennessee is receiving the worst performance in BellSouth's region? The answer is no. In fact, BellSouth's Tennessee performance is consistent with its strong performance region-wide. For instance, during this 12-month period, January - December 2004, BellSouth met an average of 84% of the performance measurement standards prescribed by the Authority. The performance level for Tennessee and for all other states is depicted in the parentheses following the state abbreviation on the horizontal axis of Exhibit AJV-5. This exhibit shows that BellSouth's overall performance level in the States has a relatively narrow range variation between 81% and 90%.

Referring again to Exhibit AJV-5, the bars represent the SEEM payment per 1,000 CLEC lines in service. In the case of Tennessee, the monthly SEEM payment is nearly 6 times the average of the 7 states that have a transaction-based SEEM plan. In short, the data demonstrate that given a similar performance level, a measurements-based plan generates more remedy payments than a transaction-based plan and does so without providing any greater deterrent to backsliding.

The payment of excessive Tier-1 penalties generated by a measurement-based plan does not further (or even contribute to) the Authority's goal of preventing performance backsliding. Put another way, Exhibit AJV-5 demonstrates that performance is no better in states that use a measurement-based plan, nor is performance any worse in the states where BellSouth is paying pursuant to a

transaction-based plan. Throughout BellSouth's region, BellSouth's overall performance demonstrates its continued – or improved – high level of performance. Tennessee is no exception. In fact, BellSouth is continuing to deliver performance consistent with – and sometimes above – the level that garnered a grant of interLATA authority.

The difference in the level of payments in Tennessee is not the result of a Tennessee performance problem. Instead, the disparity in Tennessee payments results from the fact that the Current Plan in Tennessee assigns penalties based on 830 individual measurements and sub-measurements, which operate to produce high penalties on the same (or better) performance compared to penalties in other states.

No doubt, CLECs will continue to urge the use of a measurement-based plan for Tennessee. A measurement-based plan, resulting in excessive Tier-I payments, however, does not result in better performance for CLECs. Instead, it simply provides a stream of payments to CLECs in some states, not provided in others, where performance is substantially the same region-wide. This type of SEEM payments approach is not realistically tied to performance, is not an obligation of BellSouth, nor should it be a goal of the Authority. Any system that results in such substantial, regulatory-driven (not commercial) payments creates grave risks that parties will engage in otherwise irrational behavior in order to reap the benefits of regulatory penalties – instead of focusing on real market business opportunities. CLECs should not be encouraged to plan their business around a

stream of payments, like those depicted in the charts above, which are not based on real performance problems.

Indeed, the FCC recognized, and even specifically anticipated, that Tennessee's plan would change and evolve over time. Further, the FCC indicated, without any apparent concern, that the Tennessee SEEM plan would evolve towards a more commercially reasonable type of remedy such as liquidated damages:

> We have not mandated any particular penalty structure and we recognize different structures can be equally effective. **We also recognize that the development and implementation of performance measures and appropriate remedies is an evolutionary process that requires changes to both measures and remedies over time.** . . . . We anticipate that the parties will continue to build on their own work and the work of other states to ensure that such measures and remedies to accurately reflect actual commercial performance in the local marketplace.[14] (emphasis added.)

THE CURRENT LEVEL OF SEEM PAYMENTS IS INAPPROPRIATE

Q. PLEASE DISCUSS WHY THE PENALTIES ASSESSED UNDER THE CURRENT PLAN ARE INAPPROPRIATE.

[14] *In the Matter of Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Authorization To Provide In-Region, InterLATA Services in Florida and Tennessee,* WC-Docket No. 02-307, Memorandum Opinion and Order , at ¶ 170.

A. Many of the current SEEM fees have no rational relationship to the damage (if any) sustained by a CLEC. Including excessive penalties in a SEEM plan is contrary to the concept that good performance should result in few, if any, payments for a failure to perform. Stated simply, the Plan is not effectively performing its function if penalties are substantial even when performance remains stable or even improves.

Q. DO YOU HAVE ANY EXAMPLES WHERE THE SEEM PENALTIES ARE EXCESSIVE?

A. Yes. Examples of excessive SEEM payments are numerous. Following are some examples, for the period January through December 2004, where BellSouth paid Tier 1 penalties over:

- $4.1 million for the measure Customer Trouble Report Rate (CTRR) for about a 2% trouble report rate,
- $2.7 million for the measure Percent Provisioning Troubles within 30 Days of Service Order Completion (PPT) even though BellSouth installed over 97% of the service orders perfectly,
- $2 million for the measure Order Completion Interval (OCI) while $1.4 million was assessed where the overall difference in the interval for the CLECs compared to the retail analogue was less than 0.7 days,
- $844,000 for the measure Percent Missed Repair Appointments (PMRA) notwithstanding that BellSouth met over 98% of its repair appointments,
- $725,000 for the measure Percent Repeat Trouble Reports within 30 Days – $690,000 of this amount was paid even though the aggregate CLEC rate was actually lower (better) than the comparable retail rate,

- $593,000 for the measures Percent Missed Installation Appointments (PMIA) despite the fact that less than 0.2% of the appointments were missed,
- $504,000 for the measure Maintenance Average Duration (MAD) even though 95% of the MAD measurements indicate that BellSouth cleared the CLECs' troubles in the aggregate more quickly than the comparable retail service.
- over $283,000 for the measure Percent Out of Service > 24 Hours (OOS) – in the May 13, 2004 *Motion of BellSouth Telecommunications, Inc., for the Establishment of a New Performance Assurance Plan* ("May 13, 2004 Motion") BellSouth identified several examples of payments to CLECs for just one trouble out of service greater than 24 hours in a given month.

In Exhibit AJV-6 attached to this testimony, BellSouth provides more details about the above examples. They are provided for illustrative purposes only and do not represent a complete list of all such flawed provisions of the Current Plan. Significantly, without limitation to the examples cited, BellSouth notes that during this period of January through December 2004, BellSouth paid almost $12 million in Tier 1 payments to CLECs in Tennessee and an additional $1 million in Tier 2 penalties. Also alarming is the fact that, during the same time, and due to the composition of the Current Plan, there were many instances in which BellSouth paid excessive payments to CLECs for service that was actually better in the aggregate than BellSouth's performance for its own retail customers.

The examples that were provided in the BellSouth's May 13, 2004 Motion, and referenced here, along with the updated information contained in this testimony, clearly demonstrate that BellSouth is paying extremely high SEEM payments

while providing excellent service to the CLECs. The payments to the CLECs are not based on poor service quality and, more importantly, cannot be reduced by providing a better grade of service, short of perfection.

V. THE EXISTING PLAN CONTAINS TOO MANY MEASURES AND TOO MANY SUB-MEASURES

Q. YOU INDICATED THAT ONE OF THE PROBLEMS WITH THE CURRENT PLAN IS THAT IT CONTAINS TOO MANY MEASURES AND SUBMEASURES. IS THERE NOW ENOUGH EXPERIENCE WITH THE FUNCTIONING OF THE PLAN TO ASSESS WHAT SHOULD AND SHOULD NOT BE RETAINED IN THE PLAN?

A. Yes. BellSouth has been reporting and monitoring performance data under the current Tennessee Plan since December 2002. So, for more than two years, BellSouth has been able to observe and analyze the functioning of the current plan's design. As a result, BellSouth has gained a better understanding of what is needed and, just as importantly, what is not needed. It is now time to improve the Current Plan to make it more suitable, on a going-forward basis, consistent with actual experience.

Q. HOW SIGNIFICANT IS THE PROBLEM OF TOO MANY MEASURES AND SUB-MEASURES IN TENNESSEE?

A. The problem is very significant and is present in both the SQM and SEEM components of the Current Plan. Thus, in addition to the problems caused by using a measurement-based remedy calculation plan instead of a transaction-based remedy calculation plan, the current SEEM plan contains metrics and sub-metrics that fail to serve the Plan's goal. Specifically, the SEEM portion of the Current Plan contains 830 sub-metrics at the Tier I level. There are over 80 CLECs in Tennessee. Since Tier I sub-metrics apply to all CLECs, there is a potential for over 66,400 SEEM determinations (830 sub-metrics x 80 CLECs). Too many SEEM sub-metrics result in few or no transactions (or activity) in many such sub-metrics. To illustrate, a recent analysis was performed of SEEM data for Florida, which uses the same plan as the Tennessee Plan. In Florida there are also 830 Tier I SEEM sub-metrics and over 200 CLECs. Thus there is a potential for over 166,000 Tier I SEEM determinations each month. During the period August through October 2003**,** the period for which this analysis was done, there was no activity for over 97% of these potential SEEM occurrences. Of the minimal number (3%) of evaluations that experienced some activity, many, for example, had less than thirty (30) transactions during a measurement period. A similar review of Tennessee data would support the same conclusion: The Current Plan is simply too granular.

This excessive disaggregation results in small sample sizes. The smaller the sample size, the more likely the sample does not constitute a statistically valid sample. From a practical perspective, paying penalties for sub-metrics that generate few or no transactions indicates that BellSouth is being forced to pay large sums even though no reliable evidence of discrimination exists. Further, the

small volumes indicate that the services upon which these penalties are paid are of inconsequential value to CLECs.

Conversely, assuming the same level of activity, reducing the number of sub-metrics increases the number of the transactions being measured in each sub-metric. Increasing the number of transactions, in turn, results in more reliable measurement results. Accordingly, by simply ***consolidating*** sub-metrics that contain minimal activity, the Authority will improve the efficiency and reliability of the Plan. BellSouth is requesting the TRA to refine aspects of the plan (such as the structure of the plan and fee schedule) to alleviate the problems created by small sample sizes.

Q. ARE THESE CONCERNS WITH SMALL SAMPLE SIZES FOR THE SQM PART OF THE PLAN?

A. Yes. Similar to concerns already expressed regarding the SEEM part of the Current Plan, the SQM part of the Current Plan also contains many measurements that serve no purpose. Specifically, many measures address functions in which there is no CLEC activity. Stated simply, for these measurements, there is nothing to measure.

Of the 2,162 SQM sub-metrics where statewide or region-wide data are reported, 404 are solely informational – meaning that BellSouth does not compare such measurements against any standard (neither a retail analog nor benchmark). Thus, the Plan requires BellSouth to monitor, for solely informational purposes, some

404 separate measurements. Because these measures are not helpful in monitoring whether discrimination occurs and therefore have no performance standard (no analog or benchmark), nor should they, this administrative effort results in no useful information about the level of service BellSouth provides to CLECs. Moreover, eliminating these measures will have no impact on penalty fees paid by BellSouth because there are no penalties associated with this cumbersome measurement process.

Setting aside the diagnostic sub-metrics, there remains 1,758 SQM sub-metrics (2,162 minus 404) that may, ***in theory***, be useful in monitoring BellSouth's ability to provide CLECs with non-discriminatory access to its network and OSS. This theory, however, does not hold true due to a lack of CLEC-generated activity (such as submitting orders or trouble tickets) in many SQM sub-metrics.

For example, an analysis of Tennessee SQM data taken from November, 2004 indicated that 59% of the non-diagnostic SQM sub-metrics ***had no activity*** (1,031 out of 1,758). Continuing with the same data, there were 727 non-diagnostic sub-metrics with ***some*** level of activity (1,758 minus 1,031). During November 2004, 346 of these 727 sub-metrics had very low activity levels of between 1 and 30. As previously stated, measuring activity levels (or sample sizes) of small samples (for example, less than 30) is a concern from a statistical perspective. Put another way, the SQM data from November 2004 revealed that there was a statistically significant level of activity in at most 380 (or 18%) of the current SQM sub-metrics (380 out of 2,162).

Q. DO OTHER PROBLEMS RESULT FROM HAVING MANY SUB-METRICS

WITH LITTLE OR NO VOLUME?

A. Yes. The most obvious problem with a large number of sub-metrics with extremely low volumes is that to the extent that the plan includes these sub-metrics for which there is no activity or very low activity the labor and expense that go into developing, maintaining and reporting these sub-metrics are largely wasted. Moreover, having a large number of sub-metrics with very low transaction volumes can also impede the proper functioning of the plan. The statistical test approved by the Authority (*i.e.*, a statistical test with balanced error probabilities) is not designed to be used with very small sample sizes. This point will be discussed in more detail in the testimony of BellSouth witness Dr. Thomas, but the point to be made here is simple: where the volume is low, the data reported are meaningless from a statistical standpoint, thereby undercutting the validity of any determination regarding parity of service.

Further, using small sample sizes makes it more likely to reach an irrational finding that BellSouth is not providing parity service when, in fact, BellSouth is providing service at parity (Type 1 error). This is caused in part because in the truncating process used in determining parity positive results within a sub-metric being reviewed (*i.e.*, cases where BellSouth provides better service to the CLECs than it does to itself) are not counted. Rather, positive results are set to zero ("truncated") making such results of no effect in the final determination of parity.

Beyond the fact that reporting results for sub-metrics with no activity or with a low volume of activity is statistically meaningless, the excessive disaggregation,

which creates so many sub-metrics, results in an overly complex reporting plan. Much of the complexity derives from the sheer volume of data reported at such high levels of disaggregation. In particular, the complexity of the plan makes it more difficult to identify and concentrate on the areas that are important. That is, the key metrics get lost in the volume of paper for physical reports and in the vast number of files for electronic reports.

There are other practical reasons that reporting such data is unnecessary. In the case of sub-metrics with consistently little or no activity, it is clear that the CLECs are not including these areas in their business plans. Certainly, no benefit is gained by reporting what frequently turns out to be zero or near zero entries month after month when CLECs have shown no inclination to pursue these specific product areas.

Q. IS THIS PROBLEM WITH TOO MANY SUB-METRICS APPLICABLE TO BOTH AGGREGATE LEVEL CLEC DATA AND CLEC-SPECIFIC DATA?

A. Yes. The problem of too many sub-metrics, resulting largely from too much disaggregation, applies to both aggregate level CLEC data and to CLEC-specific data. To the extent, however, that there is low volume at the aggregate CLEC level, making the results inconclusive, the individual CLEC results would be even less reliable and meaningful. In general, this is because if the volume for a particular sub-metric is low at the aggregate level (*i.e.*, for all CLECs in the state), when this same extensive disaggregation is reported for individual CLECs, the already low aggregate volume diminishes significantly if viewed for a specific

CLEC.

Q. DOES THE SMALL SAMPLE SIZE TABLE INCLUDED AS PART OF THE SEEM PLAN SOLVE THE PROBLEM WITH THE LOW VOLUME SUB-METRICS?

A. No, it does not, for at least three reasons. First, the small sample size table is not used for purposes of reporting BellSouth's performance results based on the SQM; the small sample size table only applies to the calculation of penalties in the SEEM plan for measures with a benchmark. Therefore, for purposes of the monthly SQM results reported, BellSouth does not apply the small sample size table before determining whether it passes or fails the performance objective so it has no impact whatsoever on reported performance results.

Second, even when we look at the SEEM plan, where the small sample size table does apply, it only applies to measures with a benchmark standard. Thus, for measures that use a retail analogue in SEEM, which accounts for a very high percentage of the measures, the small sample size table has no affect.

Finally, for measures in the SEEM plan that have a benchmark standard of performance, the small sample size table, at best, only mitigates the problems discussed concerning low volume sub-metrics. Specifically, the small sample size table, which applies to benchmark measures, simply adjusts the benchmark; it does not change the fact that the results are inconclusive on the question of

whether or not BellSouth's performance in providing service to CLECs is nondiscriminatory. More appropriately, instead of attempting to develop a better means of addressing small sample sizes, a more practical and sound approach -- from a statistical perspective -- would be to consolidate submetrics that have little or no activity (*i.e.* serve no useful purpose in a measurement or penalty plan).

Q. IF THE CURRENT PLAN IS MODIFIED TO ADDRESS THE PROBLEM OF SUB-METRICS WITH LOW VOLUMES BY AGGREGATING SUB-METRICS INTO GROUPINGS WITH MORE MEANINGFUL VOLUMES, IS THERE A DANGER OF MASKING?

A. CLECs are likely to assert that fewer metrics will mask performance problems. This is simply not the case. BellSouth witness Dr. Joey Thomas will address the issue of masking in his testimony. It is, however, worth pointing out here that BellSouth is submitting a level of disaggregation for the Proposed Plan that groups product categories together that are substantially similar. Under this approach, any masking that might occur would be minimal.

Also significant is the fact that BellSouth provides CLECs with the raw data and the process/methodologies (SQL queries) that BellSouth uses to calculate all measurements. Thus, CLECs can customize their own reports and further disaggregate performance data to suit their needs. Thereafter, if there remains some concern about masked poor performance, CLECs can collaborate with BellSouth and the Authority staff as to whether such data supports the need for additional metrics.

Q. TO THIS POINT YOUR DISCUSSION HAS FOCUSED ON THE NEGATIVE IMPACT OF HAVING TOO MUCH DISAGGREGATION WHICH RESULTS IN A LARGE NUMBER OF SUB-METRICS WITH LITTLE OR NO ACTIVITY. BUT EARLIER YOU INDICATED THAT THERE WERE TOO MANY MEASURES AS WELL – PLEASE EXPLAIN.

A. After managing the performance monitoring and enforcement plans, such as the Tennessee Plan, and collecting massive amounts of data related to these plans, BellSouth believes that it has gained a great deal of practical experience determining inefficiencies in the plan associated with the number of measurements reported. There is a great deal of overlap and duplication of measurements, or the processes that the measurements capture, that add little or nothing to the proper functioning of the plan. The bottom-line is that the existing Tennessee Plan is in fact significantly more extensive than is required to serve its purpose.

Specifically, the current SQM contains many measurements that are non-critical, duplicative or correlated with other measurements, informational measures (diagnostic measures or measures that are parity-by-design[15]) and measures that contain so little activity month after month that they reflect a lack of any appreciable interest on the part of CLECs in these measurement areas. The inclusion of such measures in the SQM unnecessarily complicates the plan while reporting a great deal of data each month that provides very little additional

[15] "Parity-by-design" measures track activities or processes that are so commingled that BellSouth cannot distinguish between performance provided to BellSouth retail customers and performance provided to CLECs. As such, BellSouth cannot discriminate against CLECs.

information with respect to BellSouth's performance.

For example, measure OSS-1, *Average Response Interval*, is a metric that BellSouth believes is non-critical. This measure captures the average time it takes for the CLECs to receive a response to queries of BellSouth's legacy systems. The type of information requested by the CLEC and captured by this measurement includes data such as appointment scheduling, service and feature availability, address verification, Telephone Numbers (TNs) and Customer Service Records (CSRs). BellSouth's retail operations access these same systems and the OSS-1 metric performance results are based on the average response time for BellSouth retail compared to the average response time for CLECs. The response times for both BellSouth retail and CLECs are typically only a matter of a few seconds and, by corollary, the differences in the response times are even shorter – in some cases less than 1 second. It is not plausible to contend that a difference of a few seconds in the response time of BellSouth's legacy system represents a critical measure.

Additionally, in the cases where the OSS response times are significantly longer for CLECs than for retail, enough to impact the CLECs adversely, the extended intervals are largely due to system problems. These system problems are either currently captured or will be captured by measure OSS-2, *OSS Availability (Pre-Ordering/Ordering)*, as this measure is proposed by BellSouth. Thus, measure OSS-1 is not a critical measure and should be eliminated.

As an example of a measure that is either duplicative of or correlated with other

measures, consider measure CM-2, *Change Management Notice Average Delay Days*. Once BellSouth fails to provide CLECs with software release notices in a timely manner, as measured by CM-1 (*Timeliness of Change Management Notices*), measure CM-2 reflects the average length of the delay, measured in days. Clearly, metric CM-2 is simply a different way of measuring the same performance results captured by CM-1. Thus, measure CM-2 is both duplicative of and correlated with measure CM-1 and therefore should be eliminated.

VI. BELLSOUTH'S PROPOSED CHANGES TO THE TENNESSEE PLAN

Q. YOU HAVE DISCUSSED A NUMBER OF PROBLEMS WITH THE CURRENT TENNESSEE PLAN. DOES BELLSOUTH HAVE A PROPOSAL TO ADDRESS THESE PROBLEMS?

A. Yes. In order to adequately address the problems identified, a new, streamlined and transaction-based plan is needed to provide a better, simpler, and more effective incentive against backsliding ("Proposed Plan"). BellSouth's Proposed Plan will replace the Current Plan's fees and fee calculation structure, which generate excessive and inappropriate penalties, even though BellSouth is not backsliding. Payment of fees when no backsliding is occurring surely encourages irrational economic behavior in the Tennessee Market. Moreover, BellSouth's Proposed Plan has been streamlined to eliminate many of the Current Plan's measures (and sub-measures) that are not necessary to ensure that BellSouth continues to perform in the same nondiscriminatory manner that resulted in Section 271 relief. Under the Proposed Plan, both BellSouth and the TRA would no longer be required to track reams of complicated data in cases where the

tracking of such measures fails to serve the Section 271-based goal of preventing backsliding.

There are certain changes proposed to the SQM and other changes that are proposed to the SEEM plan. In order to make the proposed changes easier to follow, I would like to talk about BellSouth's proposed changes to the SQM first and then discuss proposed changes to the SEEM plan. The following discussion concerning the changes to the SQM is intended to provide an overview of BellSouth's approach and rationales only. The proposed SQM, attached as Exhibit AJV-1, is BellSouth's SQM that was provided as part of its May 13, 2004 Motion plus changes reflected in the revisions to the plan provided to the Authority on December 21, 2004. BellSouth has also provided Exhibit AJV-2 as part of this testimony, which is a matrix containing a listing of the proposed changes to the Current SQM and the rationale for the proposed changes.

PROPOSED CHANGES TO THE SQM

Q. WHAT CHANGES TO THE SQM ARE YOU PROPOSING TO MAKE?

A. As already mentioned, a detailed discussion of the proposed changes to the SQM, and the rationale for the changes, is contained in Exhibit AJV-2. Here I will present an overview of the types of changes in BellSouth's proposal. These changes primarily involve two objectives: 1) Streamline the Plan by eliminating unnecessary measures and sub-measures; and 2) more reasonably align performance requirements with impact to CLECs.

Q. HOW DOES BELLSOUTH PROPOSE TO STREAMLINE THE SQM?

A. As I have already pointed out, the Current Plan requires streamlining in order to avoid the unnecessary and complex regulatory process of gathering categories upon categories of data – much of which has no real practical purpose.[16] Specifically, in order to make the plan more effective, efficient and useful, BellSouth proposes to streamline the Current Plan, by removing or aggregating certain measurements that fall into four separate categories:

1. **Measures That Provide No Useful Information.** BellSouth proposes deleting measurements for which there is no performance standard associated with the measurement. Such measurements produce "stand alone" data that tells the Authority nothing about the extent to which BellSouth provides a nondiscriminatory level of service to CLECs. Also, measurements that are parity-by-design are examples of measures of activities or processes that are so commingled that BellSouth cannot discriminate against CLECs. Measurement of these activities is simply inefficient and unnecessary, and BellSouth urges the Authority to streamline the Plan to eliminate the practice of measuring items for which no performance standard is, or should be, associated. This change will substantially reduce the administrative burden of the Current Plan with no practical impact on the ability of anyone to detect discrimination.
2. **Measures That Duplicate The Impact Of Other Measures That Are Retained.** BellSouth proposes eliminating secondary measures that gather

[16] The majority of the 2,161 SQM sub-metrics reported at the state-wide or region-wide level experience little, if any, activity on a monthly basis.

data so closely related to other existing or proposed measures that it provides little meaningful additional information. This change will improve the Plan by eliminating measures so similar to each other that they are largely redundant and unnecessary. In addition, unlike the Current Plan, the Proposed Plan will avoid producing duplicative penalties, based on overlapping data that is already captured in other existing or proposed measurements.

3. **Measures That Have Low Volume Or Impact.** BellSouth proposes deleting measurements of activities where there is no CLEC activity at all. Obviously, where CLECs are not asking BellSouth to perform, there is no need to measure BellSouth's performance. This change would help to improve the efficiency of the performance reporting mechanism by eliminating the data processing and programming required to measure functions that have no activity. BellSouth also seeks to eliminate or aggregate the measurements of items in which there is so little CLEC activity that the data produced cannot be used to make any statistically valid inference regarding parity. There are cases in which the Current Plan is actually too granular in nature; that is, the Current Plan has created categories so narrow and limited that very little falls within each such category (or sub-metric). As a result, the Plan is measuring items that are so specific and limited that the measurements are of little, if any, use. This is discussed in more detail below, but the bottom line is that, with respect to these measurements, the measurements have been made too specific to be helpful. BellSouth proposes changes that would reorient the Plan so that it will measure functions in larger groups, eliminating statistically irrelevant information that produces penalties on a flawed basis.

4. **Measures That Are Combined With Other Retained Measures.** There are

certain measures in the Current Plan that measure the same process, but simply report the data in different ways. For example, there are two measures of the percentage of LSRs that flow through BellSouth's systems without the need for manual handling. One measure reports the CLEC aggregate results and the other measure reports the results by the individual CLECs. This is the type of situation where BellSouth proposes to still report the data in the two separates ways, but to use one measure to do so rather than two.

The chart below characterizes the metrics and submetrics that BellSouth proposes to eliminate according to these categorizations.

Proposal removes measures that:	**Metrics Deleted (x) & Examples**	**Submetrics deleted**
Provide no useful information	**(9)**, OS/DA, E911, Database Update Interval, % Rejects	94
Duplicate the impact of other measures that are retained.	**(17)**, SI with FOC, Held Order, Jeopardy Notice, % Jeopardy, Completion Attempts, Usage Data Compl, Mean Time to Deliver Usage, Chg Mgmt Avg Delay Days M&R – OOS>24	1148
Have low volume or impact	**(8)**, Loop MU (Manual), Ack Timeliness, Speed of Answer, Recurring / Non Recurring Charge Compl, BFR, > 10 ckts, 2W Analog Loop w/LNP/INP, collapse products in ordering.	532

Proposal removes measures that:	Metrics Deleted (x) & Examples	Submetrics deleted
Are combined with other retained measurements	**(3)**, Flow Through, Trunk Group Performance, Order Completion Interval	133

Q. WHAT IS SIGNIFICANT ABOUT HOW BELLSOUTH APPROACHED THE REDUCTION OF MEASUREMENTS IN THE SQM?

A. The most significant aspect of the manner in which BellSouth approached the proposed reduction of measurements in the Tennessee SQM is that BellSouth's main objective was to streamline the plan to allow for the accomplishment of the same goal of providing effective performance monitoring, aimed at preventing backsliding, but to do so more efficiently. Accordingly, for each domain (Ordering, Provisioning and Maintenance and Repair, etc.) the proposed SQM has been designed to ensure that there is a measurement of accuracy and timeliness in each domain (Ordering, Provisioning, Maintenance & Repair, etc). The overall theme is to modify the SQM to include only those measures that have an impact on a CLEC's ability to compete. Through following this approach to streamlining the Tennessee SQM, BellSouth's proposal reduces the number of measurements from 76 to 42. Most importantly, this reduction in the number of measurements is accomplished while ensuring that the key indicators of BellSouth's nondiscriminatory access to CLECs are maintained.

Q. IN ADDITION TO ELIMINATING MEASURES IN THE SQM, HOW DOES BELLSOUTH PROPOSE TO REDUCE THE NUMBER OF SUB-METRICS IN THE SQM?

A. As already discussed, because of the excessive level of disaggregation in the current Tennessee SQM, there are a large number of sub-metrics with either no activity or a very low level of activity from month to month. Consequently, BellSouth proposes to eliminate these sub-metrics as separate listings. The transactions associated with these sub-metrics would not be eliminated in the vast majority of cases. Instead, low volume sub-metrics would simply be aggregated into grouping that allow for more meaningful statistical and practical comparisons. As an example, for many of the Provisioning measures, the current SQM reflects separate disaggregations, as listed under the Report Structure, for the categories: < 10 lines/circuits and $\geq$ 10 lines/circuits. There is very little activity from month to month for $\geq$ 10 lines/circuits. Therefore, BellSouth proposes to remove the separate disaggregations for these two categories.

The following chart shows the difference in the number of measures and sub-measures (based on the level of disaggregation) between the Current Plan and the Proposed Plan.

SQM Section	**Current SQM**		**Proposed SQM**	
	# Measures	**# Sub-metrics**	**# Measures**	**# Sub-metrics**
Operations Support	6	105	4	32

SQM Section	Current SQM		Proposed SQM	
	# Measures	# Sub-metrics	# Measures	# Sub-metrics
Systems				
Ordering	9	358	6	20
Provisioning	18	1407	11	246
Maintenance & Repair	7	212	5	121
Billing	10	25	3	7
Operator Svcs/Dir Assistance	4	4	0	0
Database Update Info	3	7	0	0
E911	3	3	0	0
Trunk Group Performance	2	2	1	1
Collocation	3	18	3	18
Change Management	11	21	9	22
TOTAL # OF MEASURES	**76**	**2,162**	**42**	**467**

Q. DID BELLSOUTH PROPOSE ANY OTHER CHANGES TO THE SQM?

A. Yes. BellSouth also proposed making certain miscellaneous changes of an administrative nature such as clarifying language in the SQM or correcting errors.

These changes are designed to improve certain sections of the measures such as Definitions, Business Rules, Calculations, etc. These modifications do not change the way the measures work – the way the measures work is simply made clearer. See Exhibit AJV-2 for more details concerning these proposed changes to the SQM.

BELLSOUTH'S PROPOSED CHANGES TO THE TENNESSEE SEEM PLAN

Q. WHAT CHANGES TO THE CURRENT SEEM PLAN DOES BELLSOUTH PROPOSE TO MAKE?

A. There are four major categories of changes that BellSouth proposes to make with respect to the Current SEEM plan. The changes are designed primarily to address the problems already discussed concerning the exorbitant penalties paid to CLECs that are not rationally related to performance. These include:

- Change the penalty calculation methodology from measurement-based approach to a transaction-based approach.
- Modify the Tennessee SEEM Fee Schedule to make penalty payments more in line with amounts that would typically be paid according to commercial agreements.
- Implement an approach that allows BellSouth to: (a) pay rational and reasonable amounts, based on the proposed Standard Fee Schedule, to CLECs and the Authority for performance within three (3) standard deviations the level already determined to be nondiscriminatory; (b) pay CLECs higher penalty amounts, according to an accelerated Low Performance Fee Schedule

provided in this proposal, for performance that falls below 3-standard deviations from the baseline level; and (c) make no payments for performance that exceeds 3-standard deviations above the baseline level.

- Revise the Tier 1 and Tier 2 mechanisms so that two consecutive months of an out-of-parity condition is required before penalties apply (if performance is out-of-parity for both months penalties would apply to both months). In the third consecutive month Tier 2 penalties would apply, which is consistent with the Current Plan.
- Modify measurements included in the SEEM plan, which includes changes pursuant to those contained in the Proposed SQM.

The Proposed SEEM plan is attached as Exhibit AJV-3 and the rationale for the proposed changes is contained in Exhibit AJV-4.

Q. WHY DO YOU PROPOSE TO CHANGE THE SEEM PLAN FEE SCHEDULE?

A. The primary reason for changing the fee schedule is to improve the functioning of the SEEM Plan. BellSouth's proposal makes penalty payments triggered by the plan more rational and commercially reasonable when performance is nondiscriminatory overall, yet penalties equivalent to those that exist today apply if backsliding occurs. The fee schedule in the Proposed Plan is much improved for several reasons.

First, changing from a measurement-based plan to a transaction-based plan requires a new fee schedule designed for the transaction-based model. The

current measurement-based fee schedule was developed by requiring BellSouth to derive a measurement-based fee schedule from a transaction-based fee schedule that was originally proposed years ago, when CLEC order volumes were significantly lower than today. As the transaction-based fee schedule was being converted into a measurement-based schedule, the fee amounts were set at extremely high levels in order to generate penalties sufficient to be considered a backsliding deterrent, given the lower levels of CLEC activity at the time.

Today, however, CLEC order volumes have increased substantially throughout BellSouth's region and continue to increase. This old fee schedule, designed for and based upon a stale assumption about low CLEC activity, works badly in today's world of significantly higher CLEC activity. The new transaction-based fee schedule should be revised and set reasonably in light of the current higher CLEC order volume and level of activity.

Second, the current fee schedule has never worked properly in the measurement-based plan, as it was derived from a fee schedule designed for use with a transaction-based plan. The problem cannot be fixed by merely taking that same fee schedule out of the measurement-based Current Plan and using it in a new transaction-based model, however, because it is outdated and based on the lower CLEC activity level discussed above. Further, using a measurement-based fee schedule (which is volume insensitive) in a transaction-based plan (which is volume sensitive) would only lead to an astronomical increase in SEEM penalties for the same level of performance. This would occur even though the current penalty levels in Tennessee are several times the penalty levels that have proved

sufficient in other states, and even though BellSouth's performance in Tennessee is comparable to its performance in other states.

Finally, the fee structure under BellSouth's Proposed Plan is also better than in the Current Plan because it will change to a much higher fee schedule if BellSouth's performance deteriorates by a statistically significant level. This is referred to as the "tripwire" feature. Here is how this new tripwire feature will work: First, BellSouth's performance level for the 12 months preceding the implementation of the new plan, as measured by the new performance metrics, will be calculated. Going forward, if BellSouth's performance falls significantly below that level, then the fee schedule will automatically increase dramatically. This provision of the Proposed Plan provides a powerful (and far more logical) deterrent against backsliding.

Q. BEFORE DISCUSSING BELLSOUTH'S PROPOSED SEEM FEE SCHEDULE PLEASE BRIEFLY DESCRIBE HOW THE CURRENT SEEM FEE SCHEDULE IS APPLIED.

A. The Tennessee SEEM plan uses a two-tier structure for applying penalties. Tier 1 fees apply to an individual CLEC for each sub-metric that reflects disparate performance and the assessment is paid to the individual CLEC impacted. Tier 2 fees apply for performance that is considered disparate with respect to the CLEC industry in general (aggregate level), rather than to specific CLECs, if BellSouth misses the sub-metric for three consecutive months. The Tier 2 penalty

assessments are paid to the Authority pursuant to a separate schedule that is included in the SEEM plan for Tier 1 and Tier 2 measurements.

The current Tennessee SEEM Fee Schedule shows the penalty dollar amount that applies per sub-measure missed within a particular measurement domain, such as Ordering. For example, if BellSouth fails the standard for the sub-metric Reject Interval Non-Mechanized 2W Analog Loop Design for the first month, because this sub-metric is in the Ordering category, BellSouth would pay $450 to the individual CLEC for the first month in which the metric was missed under the Tier 1 mechanism. These fees increase if the measure is missed in consecutive months.

Q. PLEASE DISCUSS HOW BELLSOUTH APPROACHED REVISING THE PROPOSED FEE SCHEDULE?

A. As previously discussed, the principal purpose of penalty payments is to provide an incentive for BellSouth to continue to provide nondiscriminatory service, *i.e.*, to deter backsliding. As already pointed out, the current fee schedule goes well beyond what is necessary as an incentive for BellSouth to maintain parity of service and is unnecessarily punitive. It also provides far more compensation to the CLEC than is necessary to address the negative impact of receiving disparate service from BellSouth and is, in fact, a windfall to the CLECs.

Generally, therefore, the fees in BellSouth's proposal are tied to recurring or non-recurring charges billed to CLECs. For example, fees for submetrics associated

with provisioning activities are based on nonrecurring charges billed to CLECs, while submetrics associated with Maintenance & Repair measures are based on recurring charges billed to CLECs. Measurements in other domains, such as Billing, are derived differently, but follow a similarly rational approach to setting fee amounts. See Exhibit AJV-7 for more detail concerning how the fees were derived.

Q. PLEASE DISCUSS HOW BELLSOUTH'S PROPOSAL TO VARY THE FEE SCHEDULE BASED ON VARIANCE FROM AN ESTABLISHED BASELINE STANDARD WOULD WORK.

A. BellSouth believes that, in light of the goal of performance assurance plans, which is to prevent backsliding, a more effective approach would be to not only sanction poor performance, as the Current Plan does, but also to reward a high level of performance. Therefore, BellSouth proposes to base penalties paid on the overall level of BellSouth's performance according to three performance grids. Specifically, BellSouth believes it has demonstrated that there has been no backsliding in its performance since receiving Section 271 authority. On that basis, arguably, BellSouth should not have to pay any penalties. However, BellSouth is not proposing to be relieved of paying penalties completely in that case, but only that the assessment of penalty amounts is rational so long as BellSouth's overall performance is consistent with the level achieved at the time of Section 271 approval.

The new Fee Schedule, designated "Standard Performance," which contains more

rational penalty amounts, would apply as long as BellSouth remains within reasonable control limits of the baseline level. This is more appropriate than in the Current Plan since, at this level of performance, BellSouth would not be backsliding. Moreover, to assure the Authority that under the Proposed Plan there remains sufficient incentive for BellSouth not to backslide, in the event that BellSouth's overall performance drops below the lower control limit, penalty payments would be assessed according to a much higher Fee Schedule, designated "Low Performance." This higher Fee Schedule would be based on the Current Tennessee Fee Schedule, but would be adjusted to operate in conjunction with a transaction-based calculation methodology rather than a measurement-based methodology (as it currently operates). Specifically, the higher schedule is the existing Georgia fee schedule, which is the transaction-based fee schedule used to develop the current Tennessee measurement-based fee schedule.

Further, in order to include not only sanctions for poor performance but also rewards for a high level of performance, BellSouth proposes that if its overall performance exceeds the threshold of the control limit, then BellSouth would not have to pay any penalties. Thus, in addition to providing an incentive for BellSouth not to backslide, this approach would also provide an incentive for BellSouth to go beyond its legal obligation.

BellSouth witness Dr. Thomas will discuss the basis and details for establishing control limits and the statistical validity of such an approach. Here I will simply describe BellSouth's proposed method of establishing the baseline and setting the upper and lower limits. First, BellSouth proposes that once the TRA issues an

order approving BellSouth's Proposed Plan, the baseline standard for overall performance would be set based on an average of the most recent 12 months of data available at the time, recalculated using the measurements set and standards adopted based on BellSouth's proposal. The upper and lower control limits would be set at three standard deviations from the baseline average.

Once these parameters (baseline average and 3-standard deviations level) are set, each month BellSouth's performance would be compared to the upper and lower control limits. If BellSouth's performance for the month were within the control limits (*i.e.*, within 3-standard deviations of the baseline mean) penalty payments would be calculated using the "Standard Performance" Schedule; if performance were below the lower control limit, penalty payments would be calculated using the "Low Performance" Schedule; if BellSouth's performance is above the upper control limit, BellSouth would not be required to pay any penalties for that month. BellSouth believes that this approach to the assessment of penalties under the SEEM plan is both more reasonable and more effective in accomplishing the goal of an enforcement plan – to prevent backsliding.

Q. HOW DOES BELLSOUTH PROPOSE TO REVISE THE OPERATION OF THE SEEM TIER 1 MECHANISM?

A. There are two changes that BellSouth proposes to make to the calculation of Tier 1 penalties. First, BellSouth would only Pay Tier 1 penalties in cases where it misses the sub-metric performance standard for two consecutive months. Second, an escalation factor would apply in the second month of consecutive failure only.

Of course, in the third month of consecutive failure at the aggregated level, Tier 2 penalties would begin and continue until BellSouth again meets the performance standard for the sub-metric.

Q. WHY DOES BELLSOUTH PROPOSE TO ONLY PAY PENALTIES IF IT MISSES THE PERFORMANCE STANDARD FOR A GIVEN SUB-METRIC FOR TWO CONSECUTIVE MONTHS?

A. Under the existing Tennessee SEEM plan, BellSouth is often required to pay Tier 1 penalties for failure to meet the established benchmark standard or retail analogue comparison criteria for a measurement, although there is no basis to conclude that occurrence is not due to a systemic problem. In other words, the disparity may have been just a random occurrence, due to a temporary system malfunction or simply caused by a minor human error. Such events do not represent any type of persistent parity issue that requires an incentive to correct. In fact, penalties for failures due to random occurrences, system malfunctions or human errors have little if any corrective value since these types of failures are anomalies. As such, these events are generally not predictable, and thus are not necessarily preventable. Thus, a penalty assessed in this case is not serving as an incentive to correct a problem with the process, but is solely punitive.

For example, the billing measure, Usage Data Delivery Accuracy, captures the percentage of the recorded usage data delivered error-free and in a format acceptable to the CLECs. During the 12-month period from December 2003 through November 2004, BellSouth's performance for this measure was such that

it did not pay any Tier 1 penalties for eleven of the twelve months. However, in one month (September 2004), BellSouth paid penalties to 42 CLECs totaling almost $19,000. This was a situation where there was obviously no systemic disparity, but rather merely a random occurrence.

Further, assessing penalties based on a single-month failure presumes the infallibility of the statistical methodology. It should be stressed that the current statistical test, or any statistical test for that matter, used to determine parity only deals in probabilities and not certainties. Also, the statistical methodology depends on inputs for certain materiality parameters such as Delta, Psi and Epsilon. That is, the statistical test in and of itself can only identify whether an observed difference in BellSouth retail and CLEC service results is statistically significant. It cannot determine whether an observed difference in BellSouth versus CLEC results is material, *i.e.*, whether it actually impacts the CLEC's ability to compete.

For example, an order completion interval of 3.1 days for BellSouth and an order completion interval of 3.4 days for the CLEC may show up as a difference that is statistically significant, but it is unlikely that this difference actually causes the CLEC to be at a competitive disadvantage. Therefore, because basing the requirement to pay penalties on a single month's result would likely include random occurrences, and because the choice of values for the materiality parameters is subjective based on business judgment, BellSouth proposes requiring two consecutive months of failure for a particular sub-metric to

establish some indication of a pattern of failure, rather than simply a discreet occurrence.

Q. HOW WOULD THIS TWO CONSECUTIVE MONTH FAILURE REQUIREMENT WORK?

A. Under BellSouth's proposal, if BellSouth failed a measurement in the first month, the penalty amount would be calculated, but payment of the calculated penalty amount would be held in abeyance until the following month's results are calculated. If the second month's result for this same metric is also out of parity, a penalty would be paid for both the first month's penalty, which was held in abeyance, and for the amount calculated for the second month. Any Tier 2 penalty would apply in addition to the Tier 1 penalty assessed. The Tier 2 penalty mechanism, thus, would not change from its present operation.

The proposed methodology for applying Tier 1 and Tier 2 penalties would provide some allowances for events that may not be entirely under BellSouth's control. That is, the plan would focus more on addressing problems that tend to persist by requiring a Tier 2 penalty, in addition to the Tier 1 penalty until the metric performance returns to parity.

Q. WHY DOES BELLSOUTH PROPOSE THAT THE TIER 1 FEE SCHEDULE ONLY INCLUDE AN ESCALATION FACTOR FOR MONTH TWO?

A. BellSouth believes that escalation beyond the second month of failure is unnecessary. Under the existing Tennessee SEEM plan, the fee escalation feature applied to Tier 1 sub-metrics increases for each consecutive month that BellSouth fails to meet the established performance criteria, up to six consecutive months. Consecutive failures beyond month six are capped at the month-six fee. There is, however, no basis for the amount that the Fee Schedule increases by each month. In fact, under the existing Fee Schedule, the fee amounts are so excessive, as already discussed, that the application of the escalation feature only compounds the arbitrarily punitive nature of the plan. Moreover, consecutive months of disparate performance at minimum levels of differences also cause the fee to be increased, despite the lack of any actual appreciable impact on the CLEC. Under BellSouth's SEEM proposal, the Tier 1 fee amounts would escalate in the second month and for each succeeding consecutive month of failure this higher penalty would apply.

Q. HOW ARE THE TIER 1 AND TIER 2 FEE SCHEDULES RELATED IN BELLSOUTH'S PROPOSAL?

A. Under BellSouth's SEEM proposal, the per unit fee amounts for the Tier 2 Standard Performance Fee Schedule is, in most cases, approximately 50% higher than the corresponding Month 1 fee amounts in the Tier 1 Standard Performance Fee Schedule. In the existing Tennessee SEEM plan, the Tier 2 fee schedule is as

much as about five times the corresponding Tier 1 fee schedule for some categories. For instance, the Month 1 Tier 1 fee amount for IC Trunks is $1,150, while the Tier 2 fee amount for IC trunks is $5,700. So, for IC Trunks, the Tier 2 fee is 4.96 times the Month 1 Tier 1 amount ($5,700/$1,150 = 4.96). While such an approach to the Tier 2 fee schedule certainly generates significant penalties, it is arbitrary and, in fact, generates excessive penalties in many cases.

Therefore, BellSouth proposes that the fee schedule for Tier 2 of SEEM should be approximately 50% higher than the Month 1 Tier 1 amount. This provides for consistency in the design of the two fee schedules that would be based on fee amounts that bear a reasonable relationship to the impact to the CLECs. As already discussed, BellSouth's proposed revision of the fee schedule is based on regional Commission approved rates.

Q. WHAT CHANGES TO THE MEASUREMENTS INCLUDED IN THE SEEM PLAN DOES BELLSOUTH PROPOSE?

A. Of course, any measurements that BellSouth recommends removing from the SQM would, correspondingly, be recommended for removal from SEEM. In addition, there are several measures that BellSouth believes should remain in the SQM, but that should be removed from either one or both Tiers of the SEEM plan:

- O-2: Acknowledgement Message Completeness: BellSouth recommends removal of this measure from Tier 1 of SEEM.
- O-4: Percent Flow-Through Service Requests (Detail): BellSouth, in its

current proposal, recommends that measures *O-3, Percent Flow-Through Service Requests (Summary)*, and *O-4, Percent Flow-Through Service Requests (Detail)* be combined into a single SQM that shows both the Aggregate CLEC data (Summary) and CLEC Specific data (Detail). The SEEM penalty, in BellSouth's proposal, would apply to the Aggregate CLEC data as a Tier 2 measure only.

- O-9: Firm Order Confirmation (FOC) Timeliness: For measure *O-9, FOC Timeliness*, BellSouth is recommending that this measure be removed from both Tier 1 and Tier 2. However, BellSouth's performance results for this measure will be included in a new measure *Firm Order Confirmation Average Completion Interva*l (FOCI) that BellSouth is proposing to include in both Tier 1 and Tier 2 of SEEM.
- O-11: Firm Order Confirmation and Reject Response Completeness: BellSouth's proposal excludes this measure from Tier 1 of the SEEM plan and includes it as a Tier 2 measure only.
- P-7C: Hot Cut Conversions – Provisioning Troubles Received within 5 Days (formerly 7 days) of a Completed Service Order: BellSouth's proposal excludes this measure from Tier 1 and Tier 2 of SEEM.
- P-13B, LNP Percent Out of Service <60 minutes; P-13C, Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date; P-13D, LNP Disconnect Timeliness (Non-Trigger): BellSouth's proposal includes these three measures as Tier 2 only.
- M&R–2: Customer Trouble Report Rate: BellSouth proposes to remove this measure from Tier 1 and Tier 2.
- M&R-4: Percent Repeat Customer Troubles within 5 Days: BellSouth

proposes to remove this measure from Tier 1.

- O-8: Reject Interval: BellSouth proposes to include only the Fully Mechanized Rejects in the SEEM Plan.
- CNDD-Non-Coordinated Customer Conversions – Percent Completed and Notified on Due Date: BellSouth proposes to add this new measure to both Tier 1 and Tier 2 of SEEM.

The rationale for these proposed changes to measurements included in the SEEM plan are reflected in Exhibit AJV-4.

Q. IN CHANGING FROM A MEASUREMENT-BASED PLAN TO A TRANSACTION-BASED PLAN, ARE THERE ANY ADDITIONAL CALCULATIONS NECESSARY IN DETERMINING SEEM PAYMENTS?

A. Yes. Of course, as already discussed, the Fee Schedule would have to be changed in order to reflect a per-transaction approach rather than a per-measurement approach. But also, since the fee amounts in the proposed Fee Schedule would apply to the number of transactions that require a remedy, a procedure for determining how many transactions are subject to payment must be used. In all of BellSouth's states that use a transaction-based plan today, the approach to calculating the number of transactions to be remedied is consistent with the approach reflected in Appendix E of BellSouth's SEEM plan filed with the Authority on May 13, 2004. Since the time of that filing BellSouth has developed a more effective approach to determining how many transactions should be subject to penalties. This new approach is included in Appendix E of BellSouth's Proposed SEEM plan attached as Exhibit AJV-3. The rationale for this approach

is provided in Exhibit AJV-4.

Q. ARE THERE ANY OTHER PROPOSED CHANGES TO THE SEEM PLAN?

A. Yes. One of the inputs to the statistical formula used for the truncated z-test is a parameter called "delta." Under the Current Plan, a function (sometimes referred to as the "Ford delta function") is used to generate various values for delta for use in the statistical model. BellSouth proposes to discontinue the use of the Ford delta function and instead to use fixed delta values of 0.5 for Tier1 and 0.35 for Tier 2. The reasoning for this proposed change is provided in Exhibit AJV-4. Additionally, BellSouth proposes to make other administrative changes to the SEEM plan, primarily to clarify the provisions or to add more specificity. See Exhibit AJV-4 for these proposed changes.

Q. WHY IS DELTA REQUIRED?

A. The statistical test is used to determine whether any apparent discrimination is statistically significant. If it were not statistically significant, then the matter would be at an end. However, there is a further question if any apparent difference is statistically significant. That additional question is whether the perceived discrimination is material. The error probability balancing used in the Truncated-Z methodology, includes parameters such as delta that allow for the application of a materiality test to the statistical results. This additional consideration is necessary to prevent the erroneous identification of observed

differences (statistical difference) as discriminatory, when in fact there is no appreciable impact on local competition (*i.e.*, no material difference in results).

VII. BELLSOUTH'S PROPOSAL MEETS THE SELECTION CRITERIA FOR PERMANENT SQM AND SEEM PLANS

Q. PLEASE SUMMARIZE THE MAIN POINTS OF BELLSOUTH'S PROPOSAL AND WHY IT SHOULD BE ADOPTED BY THE AUTHORITY.

A. The Proposed Plan retains the FCC's five criteria for an effective performance assurance plan in terms of: total potential liability; well-defined measurements and standards; reasonable structure for monitoring performance and sanctioning poor performance if it occurs; self-executing penalty assessment; and accurate data. These characteristics derive from the positive aspects of the Current Plan, but the Proposed Plan also includes the more practical, effective and efficient considerations discussed throughout my testimony. Namely, the Proposed Plan minimizes occurrences where nondiscriminatory performance is penalized, avoids the tendency towards uneconomic behavior due to excessive, impractical and unreasonable sanctions under the plan, sets penalties that are more in line with performance, minimizes the duplication of transactions captured by multiple measures, and focuses on key customer-impacting measurement processes.

The proposed SQM is a comprehensive compilation of relevant performance measurements with appropriate retail analogs (that is, standards that tie BellSouth's performance for CLECs to its performance for its own retail

customers) and appropriate benchmarks (that is, standards that specifically define what satisfactory performance on each measurement will be).[17]

The proposed SEEM is an enforcement mechanism that generates more rational remedy payments: more rational because they result in large penalties ***only*** in the event BellSouth fails to provide CLECs with the level of service that earned Section 271 relief. This plan is better designed to yield penalty payments only when BellSouth's service is not comparable to BellSouth's own retail operation or (where there is no comparable retail function) where BellSouth fails to meet appropriately-established benchmarks that reflect the level of service required for Section 271 relief. This is the appropriate aim of such plans.

Taken together, the proposed SQM and SEEM will provide the Authority with an improved performance measurement and enforcement mechanism, a plan better able to ensure BellSouth continues to keep meeting its Section 251 obligations in the future just as it met those obligations in order to be granted interLATA authority. By rewarding improved performance and punishing poor performance, while maintaining the FCC-approved criteria discussed below for such plans, the Proposed Plan contains appropriate incentives and sufficient safeguards for preventing performance backsliding. [18]

[17] For performance measurement purposes, a "retail analog" is used when BellSouth provides a comparable service to both CLECs and BellSouth retail customers (example, maintenance and repair measurements). A benchmark is a target and is used when there is no retail analog (example, hot cut measurements). See, for example, Para 44 of CC Docket 99-295. *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, CC Docket* 99-295, Memorandum Opinion and Order, 15 FCC Rcd 2953 (1999) (*"Bell Atlantic New York Order")* , *aff'd sub nom. AT&T v. FCC,* 220 F.3d 607 (D.C. Cir. 2000).

[18] See FCC's *Bell Atlantic New York Memorandum Opinion and Order* at ¶ 433 (establishing guidance for such plans)**.**

In granting BellSouth authority to provide interLATA service, the FCC stated that an enforcement mechanism such as SEEM is an effective mechanism for preventing "backsliding" by BellSouth in the level of service offered to CLECs after BellSouth's entry into the long distance market.[19] In making such a finding, the FCC simply indicated that the SEEM was satisfactory because it contained the previously mentioned "several key elements".[20] ***BellSouth's Proposed Plan retains all of these "key elements".*** Specifically, the FCC did not require the SEEM plan to be measurement-based rather than transaction-based. In fact, the FCC has granted interLATA authority in numerous instances where the plan was transaction-based, including in Georgia, Louisiana, South Carolina, Mississippi, Alabama, Kentucky and North Carolina in the nine-state region served by BellSouth, as well as at least 25 other states.

Q. DOES THIS CONCLUDE YOUR TESTIMONY

A. Yes.

[19] *In the Matter of Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Authorization To Provide In-Region, InterLATA Services in Florida and Tennessee,* WC-Docket No. 02-307, Memorandum Opinion and Order, ¶ 167 (2002)

[20] *Id.* at ¶ 169 and fn. 612. (key criteria are total liability at risk in the plan; performance measurement and standards definitions; structure of the plan; self-executing nature of remedies in the plan; data validation and audit procedures in the plan; and accounting requirements)

BELLSOUTH®

BellSouth Service Quality Measurement Plan (SQM)

Tennessee Proposed Performance Metrics

Measurement Descriptions
Version 2.03

Issue Date: February 25, 2005

Introduction

The BellSouth Service Quality Measurement Plan (SQM) describes in detail the measurements produced to evaluate the quality of service delivered to BellSouth'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 to provide non-discriminatory access to Competitive Local Exchange Carriers (CLEC)[1]. The reports produced by the SQM provide regulators, CLECs and BellSouth the information necessary to monitor the delivery of non-discriminatory access.

This plan results from the many divergent forces evolving from the 96 Act. This specific SQM is based on Order No. (to be determined) in TRA Docket No. 04-00150 dated (to be determined).

The SQM and the reports flowing from it must change to reflect the dynamic requirements of the industry. New measurements are added as new products, systems, and processes are developed and fielded. New products and services are added as the markets develop and the processes stabilize. The measurements will be changed to reflect the dynamic changes described above and to correct errors, respond to 3rd Party audits, Orders of the TRA, FCC and the appropriate Courts of Law.

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 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 relieves BellSouth of the obligations to provide any UNE or UNE combination pursuant to Section 251 of the Act, then upon providing the Commission with 30 days written notice, BellSouth may cease reporting data or paying remedies in accordance with the change of law. Performance measurements and remedy plans that have been ordered by the Commission can currently be accessed via the Internet on BellSouth's PMAP website (http://pmap.bellsouth.com) in the Documentation/ Exhibits folder. Should there be any difference between the performance measurement and remedy plans on BellSouth'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.

BellSouth may disregard performance data to the extent such data has been impacted by a force majeure event as that term is defined in the most recent version of BellSouth's standard interconnection agreement.

This document is intended for use by someone with knowledge of the telecommunications industry, information technologies and a functional knowledge of the subject areas covered by BellSouth Performance Measurements and the reports that flow from them.

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

Report Publication Dates

Each month, preliminary SQM reports will be posted to BellSouth's PMAP 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 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. Validated SEEM reports will be posted on the 15th of the following month or the first business day after the 15th. SEEM payments will be made on the 15th of the following month or the first business day after the 15th. For instance: May data will be posted in preliminary SQM reports on June 21st. Final validated SQM reports will be posted on the last day of the month. Final validated SEEM reports will be posted and payments mailed on the 15th of the following month.

For details on SEEM, please refer to the SEEM Administrative Plan.

BellSouth 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 replicating the reports in the SQM are contained in the Supporting Data User Manual (SDUM). The SDUM is available on the PMAP website and is automatically provided with each SDF download.

Report Delivery Methods

CLEC SQM and SEEM reports will be considered delivered when posted to the website. The State/Federal Commissions have been given access to the website.

Contents

Section 8: Change Management

Section 1: Operations Support Systems (OSS)

IA: Interface Availability (Pre-Ordering/Ordering)

Definition

This measure captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. "Functional Availability" is defined as the number of hours in the reporting period the applications/interfaces are available to users. "Scheduled Availability" is defined as the number of hours in the reporting period the applications/interfaces are scheduled to be available.

Scheduled availability is posted on the Interconnection website (http://www.interconnection.bellsouth.com/oss/oss_hour.html)

Exclusions

- CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc.

Business Rules

The Interface Availability (Full Outages) calculations are based upon availability of applications and interfacing applications utilized by CLECs for pre-ordering and ordering.

Types of outages are defined as follows:

- Full outages are defined as occurrences of either of the following:
  - Application/Interface application is down or totally inoperative
  - Application is totally inoperative for customers attempting to access or use the application (this includes transport outages when they may be directly associated with a specific application)
- Partial Loss of Functionality outages are incurred when any function the customer normally performs or a function normally provided by an application or system is unavailable to any customer.
- Degraded Service is defined as occurrences of either of the following:
  - When the application or system is known by any IT organization to be processing 20% or more below normal capacity
  - When 20% or more of the clients experience slow response from the system or application

Total Outages include Full Outages, Degraded Services and Loss of Functionality minutes, and will be calculated for diagnostic purposes.

Calculation

Interface Availability (Pre-Ordering/Ordering)

Interface Availability (Full Outages) = (a – b) / a X 100

- a = Scheduled Availability Minutes
- b = Full Outage Minutes

Interface Availability (Total Outages) = [a - (b + c + d)] / a X 100

- c = Loss of Functionality Minutes
- d = Degraded Service Minutes

Report Structure

- Legacy System/Interface Specific
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Interface Availability (Full Outages)	>= 99.5%
• Interface Availability (Total Outages)	Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

MRIA: Interface Availability (Maintenance & Repair)

Definition

This measurement captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. "Functional Availability" is defined as the number of hours in the reporting period the applications/interfaces are available to users. "Scheduled Availability" is defined as the number of hours in the reporting period the applications/interfaces are scheduled to be available.

Scheduled availability is posted on the Interconnection website (http://www.interconnection.bellsouth.com/oss/oss_hour.html).

Exclusions

- CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc.

Business Rules

The Interface Availability (Full Outages) calculations are based upon availability of applications and interfacing applications utilized by CLECs for maintenance and repair.

Types of outages are defined as follows:

- Full outages are defined as occurrences of either of the following:
  - Application/Interface application is down or totally inoperative
  - Application is totally inoperative for customers attempting to access or use the application (this includes transport outages when they may be directly associated with a specific application)
- Partial Loss of Functionality outages are incurred when any function the customer normally performs or a function normally provided by an application or system is unavailable to any customer.
- Degraded Service is defined as occurrences of either of the following:
  - When the application or system is known by any IT organization to be processing 20% or more below normal capacity
  - When 20% or more of the clients experience slow response from the system or application

Total Outages include Full Outages, Degraded Services and Loss of Functionality minutes, and will be calculated for diagnostic purposes.

Calculation

Interface Availability (M&R)

Interface Availability (Full Outages) = (a – b) / a X 100

- a = Scheduled Availability Minutes
- b = Full Outages Minutes

Interface Availability (Total Outages) = [a – (b + c + d)] / a X 100

- c = Loss of Functionality Minutes
- d = Degraded Services Minutes

Report Structure

- Legacy System/Interface Specific
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Interface Availability (Full Outages)	>= 99.5%
• Interface Availability (Total Outages)	Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

ERT: Loop Makeup - Response Time - Electronic

Definition

This report measures the percent within the interval from the electronic submission of a Loop Makeup Service Inquiry (LMUSI) to the distribution of Loop Makeup information back to the CLEC.

Exclusions

- Manually Submitted Inquiries
- Canceled Requests
- Scheduled OSS Maintenance
- Test Transactions/Records

Business Rules

The response interval starts when the CLEC's Mechanized Loop Makeup Service Inquiry (LMUSI) is submitted electronically through the ordering interface gateways. It ends when BellSouth's Loop Facility Assignment and Control System (LFACS) responds electronically to the CLEC with the requested Loop Makeup data via the ordering interface gateways.

> **Note**: The Loop Makeup Service Inquiry Form does not require the CLEC to furnish the type of Loop. The CLEC determines whether the loop makeup will support the type of service they wish to order and qualifies the loop. If a CLEC concludes that the loop makeup will support the service, and wants to order it, an LSR must be submitted by the CLEC.

Calculation

Response Interval = (a - b)

- a = Date and time LMUSI returned to CLEC
- b = Date and time the LMUSI is received

Percent within Interval = (c / d) X 100

- c = Total LMUSIs received within the interval
- d = Total number of LMUSIs processed within the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
- Interval for electronic LMUSIs:
  0 – <= 1 minute

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Loops	Benchmark: 95% <= 1 Minute

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

BMRT: UNE Bulk Migration - Response Time

Definition

This report measures the average interval and percent within the interval from the submission of a UNE Bulk Migration Notification Form to the distribution of Bulk Notification Form, including negotiated due date back to the CLEC.

Exclusions

- Projects not identified as UNE Bulk Migration
- Weekends and Holidays
- Canceled Requests

Business Rules

The CLEC Bulk Migration process includes the submission of a Bulk Migration Notification Form to BellSouth via email. The project manager negotiates due date, assigns Bulk Order Package Identification (BOPI) number, and validates related PONs in the Bulk package. BellSouth then returns the Bulk Notification Form, including negotiated due date to the CLEC.

The "Receive Date" is defined as the date the Bulk Migration Notification Form is received by the BellSouth Project Manager via email. It is counted as day zero. Bulk Migration "Return Date" is defined as the date BellSouth returns a response. The interval calculation is reset to zero when a CLEC initiated change occurs on the Bulk Migration Notification Form.

This measurement combines three sub-metrics:

1. From receipt of a valid Bulk Migration Notification Form (up to 99 individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC.
2. From receipt of a valid Bulk Migration Notification Form (100 up to 200 individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC.
3. From receipt of a valid Bulk Migration Notification Form (201 or more individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC.

Calculation

Response Interval = (a - b)

- a = Date BellSouth returns a response
- b = Date the Bulk Migration Notification Form is received

Average Interval = (c / d)

- c = Sum of all response intervals
- d = Total number of Bulk Migration Notification Forms received within the reporting period

Percent within Interval = (e / f) X 100

- e = Total Bulk Migration Notification Forms received within the interval
- f = Total number of Bulk Migration Notification Forms processed within the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
- Intervals for manual Bulk Migration Notification Forms:
  0 - <= 99 individual telephone numbers
  - 0 – <= 4 Business days
  - > 4 Business days

  100 - <= 200 individual telephone numbers
  - 0 - <= 6 Business days

- > 6 Business days

>= 201 individual telephone numbers

- Average Interval in days

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• 0 - <= 99 individual telephone numbers	Benchmark: 95% <= 4 Business Days
• 100 - <= 200 individual telephone numbers	Benchmark: 95% <= 6 Business Days
• >= 201 individual telephone numbers	Benchmark: Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
No		

Section 2: Ordering

AKC: Acknowledgement Message Completeness

Definition

This measure provides the percent of transmissions/LSRs received via ordering interface gateways, which are acknowledged electronically.

Exclusions

- Manually Submitted LSRs
- Test Transactions/Records

Business Rules

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.

Calculation

Acknowledgement Completeness = (a / b) X 100

- a = Total number of Functional Acknowledgements returned in the reporting period for transmissions/LSRs electronically submitted by ordering interface gateways respectively
- b = Total number of electronically submitted transmissions/LSRs received in the reporting period by ordering interface gateways respectively

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Acknowledgements	Benchmark: 99.5%

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

PFT: Percent Flow-Through Service Requests

Definition

The percentage of Local Service Requests (LSRs) and Local Number Portability LSRs submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued, without manual intervention.

Exclusions

- Fatal Rejects
- Auto Clarification
- Planned Manual Fallout
- CLEC System Fallout
- Test Transactions/Records
- LSRs that receive a Z Status

Business Rules

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).

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.

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.

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 for manual handling.

*See LSR Flow-Through Matrix on BellSouth's PMAP 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.

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 will be sent back to the CLEC for clarification. If it is determined the error is due to BellSouth system functionality, the LCSC representative will correct the error and the LSR will continue to be processed.

Z Status: LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR.

Calculation

Percent Flow Through = a / [b - (c + d + e + f)] X 100

- a = The total number of LSRs that flow through the source systems and reach a status for a FOC to be issued
- b = The number of LSRs that passed the basic system edits and are accepted for further service order processing
- c = The number of LSRs that fallout for planned manual processing
- d = The number of LSRs that are returned to the CLEC for auto clarification
- e = The number of LSRs that are returned to the CLEC from the LCSC due to CLEC data entry error
- f = The number of LSRs that receive a Z status

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• UNE	Benchmark: 85%
• Resale	Benchmark: 90%
• LNP	Benchmark: 85%

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

Notes:

- The Flow-Through Error Analysis will be posted with the Flow-Through report. The Flow-Through Error Analysis provides an analysis of each error type (by error code) that was experienced by the LSRs that did not flow through or reached a status for a FOC to be issued.
- The CLEC LSR Information, (a.k.a. LSR Detail Report) is available by subscription. A CLEC wishing to receive a copy of their report should submit a feedback form (see link located in the “Resources” section on left side of PMAP website). Enter the name of the report in the Comments section.

RI: Reject Interval

Definition

The interval for the return of a reject is the response time from the receipt of a service request [Local Service Request (LSR) or Access Service Request (ASR)] to the distribution of a reject.

Exclusions

- Service requests canceled by CLEC prior to being rejected/clarified
- Fatal Rejects
- LSRs which are identified as "Projects" with the exception of valid "Project IDs" for UNE-P to UNE Loop Bulk Migration
- Scheduled OSS Maintenance
- Test Transaction/Records

Business Rules

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.

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.

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.

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.

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).

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).

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.

Calculation

Reject Interval = (a - b)

- a = Date and time of service request rejection
- b = Date and time of service request receipt

Percent within Interval = (c / d) X 100

- c = Service requests rejected in reported interval
- d = Total service requests rejected in report period

Report Structure

One report with the following four Disaggregation Levels and their associated interval buckets:

- Fully Mechanized:
  0 - <= 1 hour
- Partially Mechanized:
  0 - <= 10 hours
- Non-Mechanized:
  0 - <= 18 hours
- Local Interconnection Trunks:
  0 - <= 4 days
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Fully Mechanized	97% <= 1 Hour
Partially Mechanized	90% <= 10 Hours
Non-Mechanized	85% <= 18 Hours
Local Interconnection Trunks	85% <= 4 Days

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

FOCT: Firm Order Confirmation Timeliness

Definition

The interval for return of a Firm Order Confirmation (FOC) is the response time from the receipt of a valid Access Service Request (ASR)/Local Service Request (LSR) to distribution of a FOC.

Exclusions

- 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 which are identified as "Projects" with the exception of valid "Projects IDs" for /UNE-P to UNE Loop Bulk Migrations
- Test Transactions/Records
- Scheduled OSS Maintenance

Business Rules

When multiple FOCs occur on a single LSR/ASR, the first FOC is used to measure the interval.

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 processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.

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 service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.

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) until appropriate service orders are issued by a BellSouth 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.

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).

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).

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.

Calculation

Firm Order Confirmation Interval = (a - b)

- a = Date and time of Firm Order Confirmation
- b = Date and time of service request receipt

Percent within Interval = (c / d) X 100

- c = Service requests confirmed in reported interval
- d = Total service requests confirmed in the report period

Report Structure

One report with the following four Disaggregation Levels and their associated interval buckets:

- Fully Mechanized:
  0 - <= 3 hours
- Partially Mechanized:
  0 - <= 10 hours
- Non-mechanized:
  0 - <= 24 hours
- Local Interconnection Trunks:
  0 - <= 10 days
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Fully Mechanized	95% <= 3 Hours
Partially Mechanized	90% <= 10 Hours
Non-Mechanized	90% <= 24 Hours
Local Interconnection Trunks	95% <= 10 Days

SEEM Measure

SEEM	Tier I	Tier II
No		

FOCRC: Firm Order Confirmation and Reject Response Completeness

Definition

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.

Exclusions

- Service requests canceled by the CLEC prior to FOC or Reject being sent
- Fatal Rejects
- LSRs which are identified as "Projects" with the exception of valid "Projects IDs" for UNE-P to UNE Loop Bulk Migrations
- Test Transactions/Records

Business Rules

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).

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 fall out for manual handling by the LCSC personnel.

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).

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).

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.

Calculation

Firm Order Confirmation/Reject Response Completeness = (a / b) X 100

- 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

Report Structure

- One report with the following four Disaggregation Levels:
  - Fully Mechanized
  - Partially Mechanized
  - Non-Mechanized
  - Local Interconnection Trunks
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Fully Mechanized	95% Returned
• Partially Mechanized	95% Returned
• Non-Mechanized	95% Returned
• Local Interconnection Trunks	95% Returned

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

SOAC: Service Order Accuracy

Definition

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 a BellSouth service representative in the LCSC are measured.

Exclusions

- 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)
- LSRs which are identified as "Projects"
- Listings Orders

Business Rules

The CLEC requested services on the LSR are mechanically compared to the completed service order using the CLEC affecting service attributes shown below.

Selected CLEC Affecting Service Attributes

The BellSouth Local Service Request (LSR) fields identified below will be used, as applicable, for this Service Order Accuracy review process.

A service affecting comparison of the fields listed below will determine the accuracy of the provisioning process. If any of the fields listed below are populated on the LSR and do not match the corresponding field on the Service Order and are service affecting, the order will be scored as a miss.

BellSouth will maintain a list of LCSC/System workarounds which will not be service affecting. This list will be identified in a document posted on the Interconnection website. CLECs may discuss any of the posted LCSC/System workarounds during the regular PMAP notification calls.

- Company Code
- PON
- Billed Telephone Number
- Telephone Number
- Ported Telephone Number
- Circuit ID
- PIC
- LPIC
- Directory Listing
  - 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
- Features
  - Feature Activity
  - Feature Codes
  - Feature Detail*
- Hunting
  - Hunt Group Activity
  - Hunt Group Identifier
  - Telephone Number Identifier
  - Hunt Type Code
  - Hunt Line Activity
  - Hunting Sequence
  - Number Type
  - Hunting Telephone Number
- E911 Listing
  - 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 Interconnection Website. Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this Website.

Calculation

Percent Service Order Accuracy = (a / b) X 100

- a = Orders completed without error
- b = Orders completed in reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - Region

SQM Disaggregation – Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale	95% Accurate
• UNE	95% Accurate
• UNE-P	95% Accurate

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

Section 3: Provisioning

PIAM: Percent Installation Appointments Met

Definition

This report measures the percentage of total orders for which BellSouth meets the committed due date.

Exclusions

- 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
- Listing Orders

Business Rules

All service orders are considered as met, unless the first missed appointment code is due to BellSouth company reasons.

Calculation

Percent Installation Appointments Met = (a / b) X 100

- a = Number of orders where the installation appointment is met
- b = Total number of orders completed during the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Resale Residence (Non-Design)	Retail Residence (Non-Design)
Resale Business (Non-Design)	Retail Business (Non-Design)
Resale Design	Retail Design
LNP/INP (Standalone)	Retail Residence and Business (POTS)
UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Orders)
UNE Digital Loop < DS1	Retail Digital Loop < DS1
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE Loop + Port Combinations	Retail Residence and Business
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN	Retail ISDN - BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non-Design	Diagnostic
Local Interconnection Trunks	Retail Trunks

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

FOCI: Firm Order Confirmation Average Completion Interval

Definition

The "Firm Order Confirmation Average Completion Interval" measures the interval of time it takes BellSouth to provide service for the CLEC or its own customers. This report measures how well BellSouth meets the interval offered to customers on service orders from receipt of a Local Service Request (LSR) to the order completion. It is a combined report of FOC and OCI.

Exclusions

- 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 coded C, N, R, or T)
- Disconnect Orders
- "L" Appointment coded orders (where the customer has requested a later than offered interval)
- End-User Caused Missed Appointments
- Rejected LSRs
- LSRs identified as "Projects"
- Scheduled OSS Maintenance
- Listing Orders

Business Rules

For CLEC orders, the actual FOC interval and completion interval is determined for each order processed during the reporting period. The duration starts when BellSouth receives a valid LSR or ASR and stops when the technician or system completes the order in SOCS. For BellSouth retail orders, an interval representing FOC time is added to the actual completion interval to create an analogous retail analog since BellSouth retail orders do not have a comparable ordering process. The start time for the completion interval for BellSouth retail orders is the timestamp of the first entry into SOCS and the stop time is when the technician or system completes the order in SOCS. Orders worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work/non-dispatched) or field orders (dispatched). Only valid business hours/days will be included in the calculation of this interval for FOC interval and valid business days for OCI interval. Valid business days and hours can be found on the Interconnection website (http://www.interconnection.bellsouth.com/#local orderinghandbook/intervalguide).

LSR/ASR Business Hours:

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).

Mechanized Rules For LSR Receipt:

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) that does not fall out for manual handling until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.

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 service representative, via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS), to SOCS and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.

Non-Mechanized: The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time LSRs received in the center) until appropriate service orders are issued by a BellSouth 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.

Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the center. Trunk data is reported separately.

When multiple FOCs occur on a single request, the first FOC is used to measure the interval.

Calculation

Firm Order Confirmation Completion Interval = (a - b)

- a = Service order completion date
- b = Service request receipt date and time

Firm Order Confirmation Average Completion Interval = (c / d)

- c = Sum of all completion intervals
- d = Count of orders completed in reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Reported in categories of < 6 lines/circuits, >= 6 lines/circuits (except trunks)
- Dispatch/Non-Dispatch categories applicable to all levels except trunks
- Fully Mechanized; Partially Mechanized; Non-Mechanized; Local Interconnection Trunks
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

		Performance Standard (FOC+OCI) Business Days (FOC) (Days Added to Interval)		
Disaggregation	**Analog/Benchmark (OCI)**	**FM**	**PM**	**NM**
Resale Residence (Non-Design)	Retail Residence (Non-Design)	.5	1.0	2.5
Resale Business (Non-Design)	Retail Business (Non-Design)	.5	1.0	2.5
Resale Design	Retail Design	.5	1.0	2.5
LNP\INP (Standalone)	Retail Residence and Business (POTS)	.5	1.0	2.5
UNE Analog Loop (Dispatch)	Retail Residence, Business and Design (Dispatch)	.5	1.0	2.5
UNE Analog Loop (Non-Dispatch)	Retail Residence and Business (Non-Dispatch) (Excluding Switched Based Orders) Plus One Day	.5	1.0	2.5
UNE Digital Loop < DS1	Retail Digital Loop < DS1	.5	1.0	2.5
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1	.5	1.0	2.5
UNE Loop + Port Combinations	Retail Residence and Business	.5	1.0	2.5
UNE EELs	Retail DS1/D S3	.5	1.0	2.5
UNE xDSL (HDSL, ADSL and UCL) without conditioning	6 Days	.5	1.0	2.5
UNE xDSL (HDSL, ADSL and UCL) with conditioning	12 Days	.5	1.0	2.5
UNE Line Splitting without conditioning	ADSL Provided to Retail	.5	1.0	2.5
UNE Line Splitting with conditioning	12 Days	.5	1.0	2.5
UNE ISDN	Retail ISDN – BRI	.5	1.0	2.5
UNE Other Design	Diagnostic	.5	1.0	2.5
UNE Other Non-Design	Diagnostic	.5	1.0	2.5
Local Interconnection Trunks	Retail Trunks			10

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

CCCI: Coordinated Customer Conversions Interval – Hot Cut Duration

Definition

This report measures the average time it takes BellSouth to disconnect loops from the BellSouth switch, connect the loops to the CLEC, and notify the CLEC after the conversion is complete. This measurement applies to service orders where the CLEC has requested BellSouth to provide a coordinated conversion.

Exclusions

- Canceled Service Orders
- Delays caused by the CLEC
- Non-Coordinated Conversions
- 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

Coordinated conversions are scheduled between the CLEC and BellSouth. The start time for this measure will be the mutually agreed upon start of the conversion and the stop time will be when the CLEC is notified after the conversion is complete. The conversion interval for the entire service order is calculated and then divided by the number of loops converted to determine the average duration per loop.

Calculation

Coordinated Customer Conversions Interval = (a - b) / c

- a = Completion date and time of CLEC notification
- b = Start date and time of conversion
- c = Number of loops per order

Percent Coordinated Customer Conversions (d / e) X 100

- d = Total number of Coordinated Customer Conversions (loops) within <= 20 minutes
- e = Total number of Coordinated Customer Conversions (loops) for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Coordinated Customer Conversions (Loops)	95% <= 20 Minutes

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

HCT: Coordinated Customer Conversions – Hot Cut Timeliness

Definition

This report measures the percentage of orders where BellSouth begins the conversion of a loop on a coordinated and/or a time specific order within a timely manner of the CLEC requested start time.

Exclusions

- Any order canceled by the CLEC
- Delays caused by the CLEC
- Loops where there is no existing subscriber loop and loops where coordination is not requested
- Subsequent loops on multiple loop orders after the first loop
- 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

The cut is considered "on time" if it starts <= 15 minutes before or after the requested start time. If a cut involves multiple lines, the cut will be considered "on time" if the first line is cut within the "on time" interval. If Integrated Digital Loop Carrier (IDLC) is involved, BellSouth must notify the CLEC by 10:30 AM on the day before the due date and then the "on time" interval is <= 2 hours before or after the requested start time.

Calculation

Percent within Interval = (a / b) X 100

- a = Total number of coordinated unbundled loop orders converted "on time"
- b = Total number of coordinated unbundled loop orders for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Product Reporting Level	
- Non-IDLC	95% within + or – 15 minutes of scheduled start time
- IDLC	95% within + or – 2 hours of scheduled start time

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

RT: Coordinated Customer Conversions – Average Recovery Time

Definition

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.

Exclusions

- 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

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.

Calculation

Recovery Time = (a - b)

- 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

Average Recovery Time = (c / d)

- c = Sum of all the Recovery Times
- d = Number of troubles referred to BellSouth

Percentage of Items with No Troubles = (e /f) X 100

- e = Total items in the reporting period that did not have a trouble during a coordinated conversion
- f = Total items for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Coordinated Customer Conversions (Loops)	Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
No		

PT: Hot Cut Conversions - Percent Provisioning Troubles Received within 5 Days of a Completed Service Order

Definition

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.

Exclusions

- 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 T)
- Troubles outside of BellSouth's control
- Disconnect Orders

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

Percentage of Provisioning Troubles within 5 Days of Service Order Completion = (a / b) X 100

- 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

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• UNE Loops	<= 5%

SEEM Measure

SEEM	Tier I	Tier II
No		

CNDD: Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date

Definition

This report measures the percentage of non-coordinated conversions that BellSouth completed and provided notification to the CLEC on the due date during the reporting period.

Exclusions

- CLEC Canceled Service Orders
- Delays Caused by the CLEC
- 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)

Business Rules

The order is considered successfully completed if the order is completed on the due date and the CLEC is notified on the due date.

Calculation

Percent = (a / b) X 100

- a = Total number of non-coordinated conversions completed on the due date with CLEC notification
- b = Total number of non-coordinated conversions for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Non-Coordinated Conversions	95% Completed on Due Date with CLEC Notification

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

PPT: Percent Provisioning Troubles within 5 Days of Service Order Completion

Definition

This report measures the quality and accuracy of the provisioning process by calculating the percentage of troubles received within 5 days of service order completion.

Exclusions

- 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
- Trouble reports caused and closed out to Customer Provided Equipment (CPE) or CLEC Equipment
- Listing Orders
- Troubles outside of BellSouth's control

Business Rules

The first trouble report received after the completion of a service order is counted in this measure. When the completed service order is matched to a trouble report, it is uniquely counted one time in the numerator. Candidates are identified by searching the prior report period for all completed service orders and then searching for all trouble reports received within 5 days of the service order completion date.

Calculation

Percent Provisioning Troubles within 5 Days of Service Order Completion = (a / b) X 100

- a = Total completed orders receiving a trouble report within 5 days of the service order(s) completion
- b = All service orders completed in the previous reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM 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)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Orders)
UNE Digital Loop < DS1	Retail Digital Loop < DS1
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE Loop + Port Combinations	Retail Residence and Business
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non - Design	Diagnostic
Local Interconnection Trunks	Retail Trunks

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

LOOS: LNP-Percent Out of Service < 60 Minutes

Definition

This report measures the percentage of time that BellSouth performs electronic system updates within 60 minutes of receiving LNP activations.

Exclusions

- CLEC Caused Errors
- NPAC errors unless caused by BellSouth
- Standalone LNP orders with more than 500 number activations
- 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
- Scheduled OSS Maintenance

Business Rules

The interval starts when the ESI Number Manager broadcast message is sent to BellSouth's gateway. The end time is the confirmation receipt time in the Local Service Management Systems (LSMS), which advises that BellSouth's electronic systems have successfully been updated. A disconnect time for all telephone numbers contained within an order will be calculated and averaged to present a disconnect time for the order as a whole.

Calculation

Percent Out of Service < 60 Minutes = (a / b) X 100

- a = Number of orders containing activations provisioned in less than 60 minutes
- b = Total orders containing LNP Activations

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation – Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• LNP	> = 95%

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

LAT: LNP-Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date

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.

Exclusions

- Remote Call Forwarding, DIDs, and ISDN Data TNs
- 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

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.

Calculation

Percentage of 10-Digit Trigger Applications = (a / b) X 100

- a = Count of LNP orders for which 10-digit trigger was applied prior to due date
- b = Total LNP orders for which 10-digit triggers were applicable

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation – Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• LNP	>= 95%

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

DTNT: LNP-Disconnect Timeliness (Non-Trigger)

Definition

This report measures the percentage of time translations are removed from BellSouth's switch within 12 hours of the receipt of a non-triggerable port activation message. When multiple numbers are ported on a single order, translations for each number must be removed within the interval.

Exclusions

- 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)
- Listing Orders
- CLEC Caused Errors
- NPAC Errors, unless caused by BellSouth
- Incomplete ports where only a subset of the total requested lines on the LSR are submitted via Activate Messages
- LSRs where the CLEC did not contact BellSouth within 30 minutes after Activate Message

Business Rules

Disconnect Timeliness is the elapsed time from when BellSouth 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 switch. Non-business hours will be excluded from the duration calculation for unscheduled LNP ports.

Calculation

Disconnect Timeliness = (a / b) X 100

- a = Number of non-triggerable orders with translations removed in less than 12 hours
- b = Total number of non-triggerable orders during report period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation – Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• LNP	95% <= 12 Hours

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

Section 4: Maintenance & Repair

PRAM: Repair Appointments Met

Definition

This report measures the percentage of customer trouble reports cleared by the committed date and time.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC Equipment troubles
- Informational Tickets
- Troubles outside of BellSouth's control

Business Rules

The negotiated commitment date and time is established when the repair report is received. The cleared time is the date and time BellSouth personnel clear the trouble and closes the customer trouble report in their workstation. If this is after the commitment time, the report is flagged as a 'missed commitment' or a 'missed repair appointment'. "No Access" troubles are not considered as a missed appointment.

Calculation

Percentage of Repair Appointments Met = (a / b) X 100

- a = Count of customer troubles cleared by the quoted commitment date and time
- b = Total customer trouble reports closed in the reporting period

Report Structure

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM 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)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop < DS1	Retail Digital Loop < DS1
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE Loop + Port Combinations	Retail Residence and Business
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non - Design	Diagnostic
Local Interconnection Trunks	Retail Trunks

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

CTRR: Customer Trouble Report Rate

Definition

This report measures the percentage of customer troubles closed within a calendar month.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports/lines associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC Equipment Troubles
- Informational Tickets
- Troubles outside of BellSouth's control

Business Rules

Customer Trouble Report Rate contains all closed customer direct reports, including repeat reports divided by the total "number of service" lines.

Calculation

Customer Trouble Report Rate = (a / b) X 100

- a = Count of initial and repeated customer trouble reports closed in the current reporting period
- b = Number of lines in service at end of the reporting period

Report Structure

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM 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)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop < DS1	Retail Digital Loop < DS1
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE Loop + Port Combinations	Retail Residence and Business
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non-Design	Diagnostic
Local Interconnection Trunks	Retail Trunks

SEEM Measure

SEEM	Tier I	Tier II
No		

MAD: Maintenance Average Duration

Definition

This report measures the average duration of customer troubles.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC Equipment Troubles
- Informational Tickets
- Troubles outside of BellSouth's control

Business Rules

The duration starts on the date and time of receipt of a repair request and stops on the date and time the service is restored.

For tickets administered through WFA, (CLECs and BellSouth), durations do not include No Access, Delayed Maintenance and Referred Time.

Calculation

Maintenance Duration = (a - b)

- a = Date and time of service restoration
- b = Date and time customer trouble ticket was opened

Average Maintenance Duration = (c / d)

- c = Total of all maintenance durations in the reporting period
- d = Total closed customer troubles in the reporting period

Report Structure

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM 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)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop < DS1	Retail Digital Loop < DS1
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE Loop + Port Combinations	Retail Residence and Business
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non - Design	Diagnostic
Local Interconnection Trunks	Retail Trunks

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

PRT: Percent Repeat Customer Troubles within 5 Days

Definition

This report measures the number of customer trouble reports received within five days of a previous report.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC equipment troubles
- Informational Tickets
- Troubles outside of BellSouth's control

Business Rules

Customer trouble reports considered for this measure are those on the same line/circuit, received within 5 days of an original customer trouble report. Candidates for this measure are determined by using the 'cleared date' of the first trouble and the 'received date' of the next trouble.

Calculation

Percent Repeat Customer Troubles within 5 Days = (a / b) X 100

- a = Count of repeat customer trouble reports, within a continuous 5 day period
- b = Total customer trouble reports closed in the reporting period

Report Structure

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM 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)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop < DS1	Retail Digital Loop < DS1
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE Loop + Port Combinations	Retail Residence and Business
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN.	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non - Design	Diagnostic
Local Interconnection Trunks	Retail Trunks

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

AAT: Average Answer Time – Repair Centers

Definition

This report measures the average time a customer is in queue when calling a BellSouth repair center.

Exclusions

None

Business Rules

The duration starts when a CLEC representative or BellSouth customer makes a choice on the repair center menu and is put in queue for the next repair attendant and stops when the repair attendant answers the call. Abandoned calls are not included in the volume of calls handled but are included in total seconds.

Calculation

Answer Time for BellSouth Repair Centers = (a - b)

- a = Time BellSouth repair attendant answers call
- b = Time of entry into queue

Average Answer Time for BellSouth Repair Centers = (c / d)

- c = Sum of all answer times
- d = Total number of calls in the reporting period

Report Structure

- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• CLEC Average Answer Time	BellSouth Average Answer Time

SEEM Measure

SEEM	Tier I	Tier II
No		

Section 5: Billing

BIA: Invoice Accuracy

Definition

This measure reports the accuracy of billing invoices rendered by BellSouth to wholesale and retail customers.

Exclusions

- 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).
- Test Accounts

Business Rules

Absolute value of total billed revenue and absolute value of adjustment amounts related to billing errors appearing on the bill during the report month are used to compute invoice accuracy. All bill periods are included in a report month.

Calculation

Invoice Accuracy = [(a - b) / a] X 100

- a = Absolute value of total billed revenues during report month
- b = Absolute value of total billing error related adjustments during report month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
CLEC Invoice Accuracy	
• Resale	Retail Invoice Accuracy
• UNE	Retail Invoice Accuracy
• Interconnection	Retail Invoice Accuracy

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

BIT: Mean Time to Deliver Invoices

Definition

This report measures the mean interval for timeliness of billing invoices delivered to USPS (US Postal Service) or transmitted to the customer in an agreed upon format.

Exclusions

None

Business Rules

Invoice timeliness is determined by calculating the interval between the bill period date and actual transmission or distribution of the invoice. 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 delivery date is counted as the last workday. Invoice delivery date is the workday the invoice is delivered to the Post Office or transmitted to the customer. CLEC bills and BellSouth bills delivered in less than or equal to one day difference will be considered parity.

Calculation

Invoice Timeliness = (a - b)

- a = Invoice Delivery Date
- b = Bill Cycle Period Date

Mean Time to Deliver Invoices = (c / d)

- c = Sum of all invoice timeliness intervals
- d = Count of invoices delivered in reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog Benchmark

The average delivery intervals are compared as follows:

- Resale CRIS.....Retail CRIS
- UNE CRIS.....Retail CRIS
- Interconnection CABS.....Retail CABS

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

UDDT: Usage Data Delivery Timeliness

Definition

This report measures recorded usage data that is delivered to the appropriate CLEC within six (6) calendar days from the receipt of the initial recording.

Exclusions

None

Business Rules

The timeliness interval of usage recorded by other companies is measured from the date BellSouth receives the records to the date BellSouth distributes to the CLEC. Method of delivery is at the option of the CLEC.

Calculation

Usage Data Delivery Timeliness Current Month = (a / b) X 100

- a = Total number of usage records sent within six (6) calendar days from initial recording/receipt
- b = Total number of usage records sent

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Usage Data Delivery Timeliness	>= 95% in Six Calendar Days

SEEM Measure

SEEM	Tier I	Tier II
No		

Section 6: Trunk Group Performance

TGPA: Trunk Group Performance

Definition

This report displays Trunk Group blocking performance for both BellSouth and CLECs.

Exclusions

- 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 the CLEC
- Trunk groups for which valid data is not available for an entire study period
- Duplicate trunk group information
- Trunk groups blocked due to CLEC network/equipment failure
- Final groups actually overflowing, not blocked

Business Rules

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.

Monthly Average Blocking:

- 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.

Aggregate Monthly Blocking:

- 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.

Trunk Categorization:

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:

CLEC Affecting Categories:

	Point A	Point B
Category 1:	BellSouth End Office	BellSouth Access Tandem
Category 3:	BellSouth End Office	CLEC Switch
Category 4:	BellSouth Local Tandem	CLEC Switch
Category 5:	BellSouth Access Tandem	CLEC Switch
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

BellSouth Affecting Categories:

	Point A	Point B
Category 1:	BellSouth End Office	BellSouth Access Tandem
Category 9:	BellSouth End Office	BellSouth End Office
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

Calculation

Monthly Average Blocking:

- 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.

Aggregate Monthly Blocking:

- 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.

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• CLEC Aggregate and CLEC Specific	BellSouth Aggregate 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 applicable) and 16 for CLECs and 1, 9, 10 (where applicable) and 16 for BellSouth

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

Section 7: Collocation

ART: Collocation Average Response Time

Definition

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.

Exclusions

- Any application canceled by the CLEC

Business Rules

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.

Calculation

Response Time = (a - b)

- a = Request Response Date
- b = Request Submission Date

Average Response Time = (c / d)

- c = Sum of all response times
- d = Count of responses returned within the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Virtual	15 Calendar Days
Physical Caged	15 Calendar Days
Physical Cageless	15 Calendar Days

SEEM Measure

SEEM	Tier I	Tier II
No		

AT: Collocation Average Arrangement Time

Definition

This report measures BellSouth's performance in provisioning a collocation arrangement.

Exclusions

- 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 for collocation arrangements begins on the date BellSouth receives a complete and accurate bona fide firm order accompanied by the appropriate fee, if required; and ends on the date BellSouth completes the collocation arrangement and notifies the CLEC.

Calculation

Arrangement Time = (a - b)

- a = Date collocation arrangement is complete
- b = Date order for collocation arrangement submitted

Average Arrangement Time = (c / d)

- c = Sum of all arrangement times
- d = Total number of collocation arrangements completed during reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Retail Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Virtual – Initial	60 Calendar Days
Virtual Augment (without space increase)	60 Calendar Days
Virtual-Augment (with space increase)	60 Calendar Days
Physical Caged-Initial (Ordinary)	90 Calendar Days
Physical Caged-Augment (without space increase)	45 Calendar Days
Physical Caged-Augment (with space increase)	90 Calendar Days
Physical Cageless Initial	90 Calendar Days
Physical Cageless Augment (without space increase)	45 Calendar Days
Physical Cageless Augment (with space increase)	90 Calendar Days

SEEM Measure

SEEM	Tier I	Tier II
No		

PMDD: Collocation Percent of Due Dates Missed

Definition

This report measures the percentage of missed due dates for collocation arrangements.

Exclusions

- Any bona fide firm order canceled by the CLEC

Business Rules

Percent Due Dates Missed is the percentage of total collocation arrangements which BellSouth is unable to complete by the BellSouth committed due date.

Calculation

Percent Due Dates Missed = (a / b) X 100

- a = Number of completed collocation arrangements that were not completed by the committed due date in the reporting period
- b = Total number of collocation arrangements completed in the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Virtual	>= 95% on time
• Physical	>= 95% on time

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

Section 8: Change Management

CMN: Timeliness of Change Management Notices

Definition

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.

Exclusions

- 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

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.

Calculation

Timeliness of Change Management Notices = (a / b) X 100

- a = Total number of Change Management Notifications sent within required timeframes
- b = Total number of Change Management Notifications sent

Report Structure

- BellSouth Aggregate
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Notices	95% >= 30 Days of Release

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

CMD: Timeliness of Documents Associated with Change

Definition

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.

Exclusions

- Documentation for release dates that slip less than 30 days for reasons outside BellSouth's control, such as changes due to Regulatory mandate or CLEC request
- Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process

Business Rules

Documentation standards and timeframes can be found in the Change Control Process, on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html).

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.

Calculation

Timeliness of Documents Associated with Change = (a / b) X 100

- a = Change Management documents sent within required timeframes after notices
- b = Total number of Change Management documents sent

Report Structure

- BellSouth Aggregate
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Documents	95% >= 30 days if new feature coding is required 95% >= 5 days for documentation defects, corrections or clarifications

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

ION: Notification of CLEC Interface Outages

Definition

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.

Exclusions

None

Business Rules

BellSouth has 15 minutes to notify the CLEC's 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:

1. BellSouth can duplicate a CLEC reported system error.
2. BellSouth finds an error message within the error log that identically matches a CLEC reported system outage.
3. When three or more CLECs report the identical type of outage.
4. BellSouth detects a problem due to the loss of functionality for users of a system.

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.

Calculation

Notification of CLEC Interface Outages = (a / b) X 100

- a = Number of interface outages where CLECs are notified within 15 minutes
- b = Total number of interface outages

Report Structure

- CLEC Aggregate
- Geographic Scope
  - Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• By interface type for all interfaces accessed by CLECs	97% <= 15 Minutes

Interface	Applicable to
EDI	CLEC
CSOTS	CLEC
LENS	CLEC
TAG	CLEC
ECTA	CLEC
TAFI	CLEC/BellSouth

SEEM Measure

SEEM	Tier I	Tier II
No		

PSEC: Percentage of Software Errors Corrected in "X" Business Days

Definition

This report measures the percentage of software errors corrected by BellSouth in "X" business days within the report period.

Exclusions

- 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)

Business Rules

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 to the change control website. Currently "X" business days is defined in the CCP as 10 = Severity 2, 30 = Severity 3, and 45 = Severity 4. The current intervals for this measure will be consistent with the intervals set in the CCP. A copy of the most current CCP can be found on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). Software defects are defined as Type 6 Change Requests in the Change Control Process.

Calculation

Percentage of Software Errors Corrected in "X" Business Days = (a / b) X 100

- a = Total number of software errors corrected in "X" business days, as defined for each severity level (Severity 2, Severity 3, and Severity 4) within the reporting period
- b = Total number of Severity 2, Severity 3, and Severity 4 software errors corrected within the reporting period

Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days
- Geographic Scope
  - Region

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Errors Corrected	95% within Interval

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

PCRAR: Percentage of Change Requests Accepted or Rejected within 10 Days

Definition

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.

Exclusions

- Change requests canceled or withdrawn before a response from BellSouth is due

Business Rules

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/ccp_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.

Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days = (a / b) X 100

- a = Total number of change requests accepted or rejected within 10 business days
- b = Total number of change requests responded to within the reporting period

Report Structure

- BellSouth Aggregate
- Geographic Scope
  - Region

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Requests Accepted/Rejected	95% within Interval

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

PCRR: Percent Change Requests Rejected

Definition

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.

Exclusions

- Change requests canceled or withdrawn before a response from BellSouth is due

Business Rules

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/ccp_live/index.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.

Calculation

Percent Change Requests Rejected = (a / b) X 100

- a = Total number of change requests rejected
- b = Total number of change requests responded to within the reporting period

Report Structure

- BellSouth Aggregate
- Geographic Scope
  - Region

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Reason – Cost	Diagnostic
Reason – Technical Feasibility	Diagnostic
Reason – Industry Direction	Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
No		

NDPR: Number of Defects in Production Releases (Type 6 CR)

Definition

This report measures the number of defects in production releases. This measure will be presented as the number of Type 6 Severity 2 Defects, the number of Type 6 Severity 3 Defects without a mechanized work around, 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 2, Severity 3, and Severity 4 Defects can be found in the Change Control Process document.

Exclusions

None

Business Rules

This metric measures the number of Type 6 Severity 2 Defects, the number of Type 6 Severity 3 Defects without a mechanized work around, 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 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).

Calculation

The number of Type 6 Severity 2 Defects, the number of Type 6 Severity 3 Defects without a mechanized work around, and the number of Type 6 Severity 4 Defects.

Report Structure

- Production Releases
- Number of Type 6 Severity 2 Defects
- Number of Type 6 Severity 3 Defects without a mechanized work around
- Number of Type 6 Severity 4 Defects
- Geographic Scope
  - Region

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Number of Type 6 Severity 2 Defects	0 Defects
• Number of Type 6 Severity 3 Defects without a mechanized work around	0 Defects
• Number of Type 6 Severity 4 Defects	0 Defects

SEEM Measure

SEEM	Tier I	Tier II
No		

SV: Software Validation

Definition

This report measures software validation test results for production releases of BellSouth local interfaces.

Exclusions

None

Business Rules

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, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth 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.

A transaction is considered failed if the request cannot be submitted or processed, or results in incorrect or improperly formatted data.

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/ccp_live/index.html).

Calculation

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.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

Report Structure

- BellSouth Aggregate
- Geographic Scope
  - Region

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Failed Transactions	<= 5%

SEEM Measure

SEEM	Tier I	Tier II
No		

PCRIP: Percentage of Change Requests Implemented within 60 Weeks of Prioritization

Definition

This report measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

Exclusions

- Change requests implemented later than 60 weeks with the consent of the CLECs
- Change requests where BellSouth has regulatory authority to exceed the interval

Business Rules

The interval for each change request begins when it has been prioritized as described in the Change Control Process and ends when the change request has been implemented by BellSouth and made available to the CLECs.

Calculation

Percentage of Type 5 CLEC Initiatned Change Requests Implemented on Time = (a / b) X 100

- a = Total number of prioritized Type 5 CLEC initiated Change Requests implemented within the data month having an implementation interval less than or equal to 60 weeks from the most recent release prioritization date
- b = Total number of prioritized Type 5 CLEC initiated Change Requests implemented within the data month

Percentage of Type 4 CLEC Initiated Change Requests Implemented on Time = (c / d) X 100

- c = Total number of prioritized Type 4 CLEC initiated Change Requests implemented within the data month having an implementation interval less than or equal to 60 weeks from the release prioritization date
- d = Total number of prioritized Type 4 CLEC initiated Change Requests implemented within the data month

Report Structure

- BellSouth Aggregate
- Type 4 Requests Implemented
- Type 5 Requests Implemented
- Percent implemented within 16, 32, 48, and 60 weeks
- Geographic Scope
  - Region

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Type 4 Requests Implemented	95% within Interval
• Type 5 Requests Implemented	95% within Interval

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

Appendix A: Glossary of Acronyms and Terms

Symbols used in calculations

-
A mathematical operator representing subtraction.

+
A mathematical operator representing addition.

/
A mathematical operator representing division.

<
A mathematical symbol that indicates the metric on the left of the symbol is less than the metric on the right.

<=
A mathematical symbol that indicates the metric on the left of the symbol is less than or equal to the metric on the right.

>
A mathematical symbol that indicates the metric on the left of the symbol is greater than the metric on the right.

>=
A mathematical symbol that indicates the metric on the left of the symbol is greater than or equal to the metric on the right.

( )
Parentheses, used to group mathematical operations which are completed before operations outside the parentheses.

A

ACD
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.

Aggregate
Sum total of all items in a like category, e.g. CLEC aggregate equals the sum total of all CLEC data for a given reporting level.

ALEC
Alternative Local Exchange Company – A customer who competes with the Incumbent Local Exchange Carrier (ILEC) in providing local service.

ADSL
Asymmetrical Digital Subscriber Line – A transmission technology that allows the use of one existing local twisted-pair to provide high-bandwidth data and voice services simultaneously.

ASR
Access Service Request - A request for access service terminating delivery of carrier traffic into a local exchange carrier's network.

ATLAS
Application for Telephone Number Load Administration System - The BellSouth Operations System used to administer the pool of available telephone numbers and to reserve selected numbers from the pool for use on pending service requests/service orders.

Auto Clarification
The number of LSRs electronically rejected from LESOG and electronically returned to the CLEC for correction.

B

BOCRIS
Business Office Customer Record Information System – System used to maintain customer account information which includes, but is not limited to, bills, payment history, and memo notations made during customer contact.

BRI
Basic Rate ISDN – This product offering is a two-way line side digital port on a two-wire digital loop. The two-wire digital loop is a dedicated digitial transmission facility.

BRC
Business Repair Center – The BellSouth Business Systems trouble receipt center which serves business and CLEC customers.

C

CABS
Carrier Access Billing System – The database that is used to store access customer service records, including customer bills and service record documents.

CCC
Coordinated Customer Conversions – A simultaneous coordination between the disconnection of existing service and the reconnection of the new service.

CCP
Change Control Process – The methods and procedures used consistently to make changes to the requirements of the metrics identified in the Service Quality Measurements Plan (SQM).

Centrex
A business telephone service, offered by local exchange carriers, which is similar to a Private Branch Exchange (PBX) but the switching equipment is located in the telephone company Central Office (CO).

CISC
Carrier Interconnection Switching Center - The BellSouth Center dedicated to handling CLEC access service requests.

CKTID
Circuit Identifier - A unique identifier for elements combined in a service configuration.

CLEC
Competitive Local Exchange Carrier – A customer who competes with the Incumbent Local Exchange Carrier (ILEC) in providing local service.

CLP
Competitive Local Provider – A customer who competes with the Incumbent Local Exhchange Carrier (ILEC) in providing local service.

CM
Change Management – The ongoing process that identifies, documents, and appropriately notifies a party of all changes and modifications.

CMDS
Centralized Message Distribution System - National system used to transfer specially formatted messages among companies.

COFFI
Central Office Feature File Interface - Provides information about USOCs and class of service. COFFI indicates all services available to a customer.

COG
Corporate Gateway - System designed for the electronic submission of xDSL Local Service Requests.

CRIS
Customer Record Information System - The BellSouth proprietary corporate database and billing system for non-access customers and services.

CRSG
Complex Resale Support Group – Provides Loop Makeup information on an address.

C-SOTS
CLEC Service Order Tracking System – Provides CLECs the ability to query the service order database.

CSR
Customer Service Record – A record of the customer/end-user information, including details about the services and physical address of the end-user.

CTTG
Common Transport Trunk Group - Trunk groups between BellSouth, independent end-offices, and the BellSouth access tandems.

CWINS Center
Customer Wholesale Interconnection Network Services Center (formerly the UNE Center) – This center provides CLECs with provisioning and maintenance for designed and non-designed local service.

D

Design
Design Service is defined as any special or plain old telephone service order which requires BellSouth design engineering activities.

Disposition & Cause
Types of trouble conditions, (e.g, No Trouble Found (NTF), Central Office Equipment (CO), Customer Premises Equipment (CPE), etc.) – These codes identify the location, equipment and/or disposition of a particular trouble. Trouble reports will be closed to the most service affecting code which describes the trouble condition repaired.

DS0
The worldwide standard speed for one digital voice signal (64,000 bps).

DS1
24 DS0s (1.544Mb/sec.)

DOE
Direct Order Entry System - An internal BellSouth service order entry system used by BellSouth service representatives to input service orders in BellSouth format.

DOM
Delivery Order Manager – Determines the needed processing steps for the service request. It then forwards the request on to each required system, in sequence, checking for errors and accuracy.

DSAP
DOE (Direct Order Entry) Support Application - A BellSouth system which assists a service representative or similar carrier agent in negotiating service provisioning commitments for non-designed services and Unbundled Network Elements.

DSL
Digital Subscriber Line – Allows customers to provide simltaneous two-way transmission of digital signals at speeds of 256 kbps via a two-wire local channel.

DUI
Database Update Information – A functional area measuring the timeliness and accuracy of database updates.

E

EDI
Electronic Data Interchange - The computer-to-computer exchange of inter and/or intra-company business documents in a public standard format.

ESSX
BellSouth Centrex Service – A central office housed communications system that provides the customer with direct inward and outward dialing, intercommunication to all stations, and custom calling features.

F

Fatal Reject
LSRs electronically rejected from LEO because the required fields are not correctly populated.

Flow-Through
In the context of this document, LSRs submitted electronically via the CLEC mechanized ordering process that flow through to the BellSouth OSS without manual or human intervention.

FOC
Firm Order Confirmation - A notification returned to the CLEC confirming the LSR has been received and accepted, including the specified commitment date.

FX
Foreign Exchange – A network-provided service in which a telephone in a given local exchange area is connected, via a private line, to a central office in another exchange.

G H

HDSL
High Bit Digital Subscriber Line – A dedicated digital transmission facility from BellSouth's Main Distribution Frame (MDF) to an end user's premises.

I J K

ILEC
Incumbent Local Exchange Carrier – Regional Bell Operating Company (RBOC)

INP
Interim Number Portability – When the customer is originally provided service by an ILEC and decides to change service to a CLEC, the customer may retain their ILEC telephone number. Calls to the ILEC number are rerouted to the CLEC using either the Remote Call Forwarding feature or over a dedicated trunk group from the ILEC switch to the CLEC.

ISDN
Integrated Services Digital Network – An integrated digital network in which the same time-division switches and digital transmission paths are used to establish connections for different services. ISDN services include telephone, data, electronic mail, and facsmile.

L

LAN
Local Area Network – A data communications system that lies within a limited spatial area, has a specific user group, has a specific topology, and is not a public switched telecommunications network, but may be connected to one.

LAUTO
The automatic processor in the LNP Gateway that validates LSRs and issues service orders.

LCSC
Local Carrier Service Center - The BellSouth center which is dedicated to handling CLEC LSRs and preordering transactions, along with associated expedite requests and escalations.

Legacy System
Term used to refer to BellSouth Operations Support Systems.

LENS
Local Exchange Navigation System - The BellSouth application developed to provide both preordering and ordering electronic interface functions for CLECs.

LEO
Local Exchange Ordering – LEO stores information and is an interface for LSR processing. LEO provides first-level validation to ensure all appropriate fields are populated.

LERG
Local Exchange Routing Guide – System used to access legacy systems and gather information to process LSRs.

LESOG
Local Exchange Service Order Generator - A BellSouth system which accepts the service order output of LEO and enters the service order into the Service Order Control System using terminal emulation technology.

LFACS
Loop Facilities Assessment and Control System - Database of facilities assigned to the service order.

LIDB
Line Information Database – Contains information about the user's calling card and other billing data.

LMOS
Loop Maintenance Operations System - A BellSouth operations system that stores the assignment and selected account information for use by downstream OSS and BellSouth personnel during provisioning and maintenance activities.

LMOS HOST
Loop Maintenance Operations System Host Computer

LMU
Loop Makeup - The physical characteristics of the loop facilities, starting at an ILEC's central office and ending at the serving distribution terminal.

LMUS
Loop Make-up Service Inquiry – The form submitted by the CLEC to obtain the loop make-up information.

LNP
Local Number Portability - In the context of this document, the capability for a subscriber to retain their current telephone number as they transfer to a different local service provider.

LNP Gateway
Local Number Portability (gateway) - A system that provides both internal and external communications with various interfaces and process including:

(1). Linking BellSouth to the Number Portability Administration Center (NPAC).

(2). Allowing for inter-company communications between BellSouth and the CLECs for electronic ordering.

(3). Providing interface between NPAC and AIN SMS for LNP routing processes.

Loops
Transmission paths from the central office to the customer premises.

LRN
Location Routing Number – A 10-digit number which routes calls to the appropiate end-user's ported telephone number.

LSR
Local Service Request – A request from a CLEC for local resale service or unbundled network elements.

M

Maintenance & Repair
The process and function by which trouble reports are sent to BellSouth, and the related service problems are resolved.

MARCH
BellSouth Operations System which accepts service order and other data, interprets the coding contained in the service order image, and constructs the specific switching system recent change command messages for input into end office switches.

N

NBR
New Business Request - Process used by CLECs to initiate a service, which is not included within its interconnection agreement.

NC
No Circuits - All circuits busy announcement.

NMLI
Native Mode LAN Interconnection - Is an intralata, shared fibered-based LAN inter-networking service.

NPA
Numbering Plan Area - Area Code portion of a telephone number.

NXX
The exchange portion of a telephone number. The first three digits in a local telephone number which identify the specific telephone company central office serving that number.

O

Ordering
The process and functions where resale services or unbundled network elements are ordered from BellSouth, as well as the process by which an LSR or ASR is placed with BellSouth.

Ordering Interface Gateways
Gateways for CLECs to submit LSRs electronically

OSPCM
Outside Plant Contract Management System – Provides scheduling and completions information on outside plant construction activities.

OSS
Operations Support System – An overall support system or database which is used to mechanize the flow and performance of work.

Out Of Service
Customer has no dial tone and cannot call out

P

PMAP
Performance Measurement Analysis Platform – Provides delivery of performance reports via the web and facilitates analysis of the summary level data.

PMQAP
Performance Measurement Quality Assurance Plan – Documents and maintains the systematic procedures used to ensure BellSouth Telecommunications (BST) produces accurate and reliable service quality measurement reports.

PON
Purchase Order Number – Identifier assigned by the customer originating the service request

POTS
Plain Old Telephone Service – A term often used to distinguish basic voice telephone from data and other services.

PREDICTOR
BellSouth system used to administer proactive maintenance and rehabilitation activities on outside plant facilities.

Preordering
The process and functions by which information is obtained, verified, or validated prior to placing a service request.

PRI
Primary Rate ISDN – An integrated services digital network interface standard designated as having 23B+D channels.

Provisioning
The process and functions where necessary work is performed to activate a service requested via a LSR/ASR.

Q R

RRC
Residence Repair Center - The BellSouth Consumer Services trouble receipt center which serves residential customers.

RSAG
Regional Street Address Guide - Validates street addresses for accuracy with state and local government records.

RSAGADDR
Regional Street Address Guide/Address – RSAG software contract for address search

RSAGTN
Regional Street Address Guide/Telephone Number - RSAG software contract for telephone number search

S

SAC
Service Advocacy Center – Resolves issues in the provisioning process

SDUM
Supporting Data User Manual

SEEM
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.

SGG
ServiceGate Gateway – A common gateway to receive and send interconnection requests.

SOCS
Service Order Control System - BellSouth system which routes service order images.

SOG
Service Order Generator – Designed to generate a service order for xDSL.

SONGS
Service Order Negotiation and Generation System – This system supports the Consumer, Small Business and Public COUs by providing data entry screens and prompts, to aid negotiation and entry of all order types.

Syntactically Incorrect Query
A query that cannot be fulfilled due to insufficient or incorrect input data from the end user. For example, A CLEC would like to query the legacy system for the following address: 1234 Main ST. Entering "1234 Main ST" will be considered syntactically correct because valid characters were used in the address field. However, entering "AB34 Main ST" will be considered syntactically incorrect because invalid characters (example: alpha characters were entered in numeric slots) were used in the address field.

T

TAFI
Trouble Analysis Facilitation Interface - Supports trouble receipt center personnel in taking and handling customer trouble reports.

TAG
Telecommunications Access Gateway – TAG was designed to provide an electronic interface or machine-to-machine interface for the bi-directional flow of information between BellSouth's OSSs and participating CLECs.

TN
Telephone Number

Total Manual Fallout
LSRs entered electronically, but require manual input into a service order generator.

U V

UCL
Unbundled Copper Link - A dedicated metallic transmission facility from BellSouth's Main Distribution Frame (MDF) to a customer's premises.

UNE
Unbundled Network Element – Provides connectivity from a Competitive Local Exchange Carrier to an end-user.

USOC
Universal Service Order Code – A set of alpha or numeric characters identifying a particular service or equipment.

W X Y Z

WFA
Work Force Administration – Electronic document tracking system.

WMC
Work Management Center – Serves as a single point of contact (SPOC) for all requests for dispatch to the Field Work Group (Central Office or outside technicians).

WTN
Working Telephone Number

XML
eXtensible Markup Language – An international standards-based data formatting option designed for information exchange on network systems.

Appendix B: BellSouth Audit Policy

BellSouth currently provides many CLECs with certain audit rights as a part of their individual interconnection agreements. However, it is not reasonable for BellSouth to undergo an audit of the SQM for every CLEC with which it has a contract. BellSouth has developed a proposed regional Audit Plan for use by the parties to an audit. If requested by a Public Service Commission or by a CLEC exercising contractual audit rights, BellSouth will agree to undergo an audit of the aggregate level reports for both BellSouth and the CLEC(s) every other year for the next five (5) years (2005-2010) to be conducted by an independent third party. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. This aggregate level audit includes the following specifications:

1. The cost shall be borne 50% by BellSouth and 50% by the CLEC or CLECs.
2. The independent third party auditor shall be selected by BellSouth, with input from the PSC, if applicable, and the CLEC(s).
3. BellSouth, the PSC and the CLEC(s) shall jointly determine the scope of the audit.

BellSouth reserves the right to make changes to this audit policy as growth and changes in the industry dictate.

Appendix C: Interface Tables

IA: Interface Availability (Pre-Ordering/Ordering)

SQM Interface Availability

Application	Applicable to	% Availability
EDI	CLEC	x
TAG/XML	CLEC	x
LENS	CLEC	x
LEO	CLEC	x
LESOG	CLEC	x
LNP Gateway	CLEC	x
COG	CLEC	x
SOG	CLEC	x
DOM	CLEC	x
SGG	CLEC	x
DOE	CLEC/BellSouth	x
SONGS	CLEC/BellSouth	x
ATLAS/COFFI	CLEC/BellSouth	x
BOCRIS/CRIS	CLEC/BellSouth	x
DSAP	CLEC/BellSouth	x
RSAG	CLEC/BellSouth	x
SOCS	CLEC/BellSouth	x

MRIA: Interface Availability (Maintenance & Repair)

SQM Interface Availability (M&R)

Interface	% Availability
BellSouth TAFI	x
CLEC TAFI	x
CLEC ECTA	x
BellSouth & CLEC	
CRIS	x
LMOS HOST	x
LNP Gateway	x
MARCH	x
OSPCM	x
PREDICTOR	x
SOCS	x

Appendix D: BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments

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:

1. Those 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. Performance sub-metric calculations that result in a shift in the performance in the aggregate from an "in parity" condition to an "out of parity" condition will be available for reposting.
3. Performance sub-metric calculations with benchmarks that are in an "out of parity" condition will be available for reposting whenever there is a >= 2% decline in BellSouth's performance at the sub-metric level.
4. Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a decline in performance as shown by an adverse change of <= .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. Performance data will be made available for a maximum of three months in arrears.
7. When updated performance data has been made available for reposting or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments. Where technically feasible, SEEM payments will be subject to recalculation for a maximum of three months in arrears from the date updated performance data was made available or the date when the payment error was discovered.
8. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies 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.
9. Any adjustments for underpayments 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.

Appendix E: Description of Raw Data and Other Supporting Data Files

BellSouth Service Quality Measurement Plan (SQMP)
Raw (Supporting) Data Files (SDF)
Other Supporting Data Files (OSDF)

I. Definitions and Overview

A. What is Raw Data?

Raw (Supporting) Data is supporting data or records captured in BellSouth Legacy Systems about activity initiated by CLECs or CLEC customers. Raw (Supporting) Data has been transformed from legacy system data to information (data with meaning). In some cases this supporting data is a combination of requests and response records, orders and troubles or other combination that provide logical transaction information. This supporting data has been normalized (converted from arcane system code to a more readable format) for easier use or, in some cases, the presentation is standardized so that the same data from different systems will be the same. In some cases, intervals have been previously calculated and, in other cases, the interval start and stop times are available. State, company, product, and other codes have been converted into English names. In short, the presentation of the information has been made more "user friendly" to facilitate use by SMEs, auditors and CLECs.

This supporting data represents all records that are used to calculate CLEC performance under the SQM sub-metrics.

II. Raw (Supporting) Data – General

Raw (Supporting) Data Files (SDF)

Raw (Supporting) Data Files for CLEC data will be published on the PMAP website each month. For the measures calculated in PMAP, 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 PMAP. Some reports are calculated outside of PMAP and the results are simply uploaded for posting. These reports will have less detailed Supporting Data Files.

Other Supporting Data Files (OSDF)

Other Supporting Data Files will also be provided upon CLEC request each month. These files contain CLECs initiated data/records extracted from the legacy systems, but "excluded" from the measures in each segment of the SQMP reports (Ordering, Flow Through Detail, Provisioning and Maintenance). The OSDF will contain only records not included in one of the SDFs. The CLEC will be able to access the request form by clicking on the OSDF folder in their section of the PMAP Web Site. The requested data will be loaded into the file within 10 business hours. The OSDF will also include partial and/or incomplete records if the CLEC owner can be identified. The OSDF will be regional in scope (not state-specific) and will include records for all related Measurements. The OSDF will not include records that are in any SDF. These four files may be large and the CLEC will be responsible for having an appropriate computer and the software necessary to accept and make manipulation of the files possible.

A. Raw Data (SDF) Records - Ordering

For Ordering Metrics:

Supporting data is provided for the following metrics:

- [AKC] Acknowledgement Message Completeness
- [RI] Reject Interval
- [FOCT] Firm Order Confirmation Timeliness
- [FOCRC] Firm Order Confirmation and Reject Response Completeness

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 or Clarified/Rejected, and versions of records not used in the reports will be placed into the Other Supporting Data File – Ordering.

B. Raw Data (SDF) Records – Provisioning

For Provisioning Metrics:

Supporting data is provided for the following metrics:

- [PIAM] Percent Installation Appointments Met
- [FOCI] Firm Order Confirmation Average Completion Interval
- [CCCI] Coordinated Customers Conversions Interval – Hot Cut Duration
- [HCT] Coordinated Customers Conversions – Hot Cut Timeliness
- [RT] Coordinated Customer Conversions – Average Recovery Time
- [PT] Hot Cut Conversions - Percent Provisioning Troubles Received within 5 Days of a Completed Service Order
- [PPT] Percent Provisioning Troubles within "X" Days of Service Order Completion

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, F, and M order types, as well as cancelled orders will be placed in the Other Supporting Data File – Provisioning.

C. Raw Data (SDF) Records – M&R

For Maintenance and Repair (M&R) Metrics:

Supporting data is provided for the following metrics:

- [PRAM] Percent Repair Appointments Met
- [CTRR] Customer Trouble Report Rate
- [MAD] Maintenance Average Duration
- [PRT] Percent Repeat Customer Troubles within 5 Days

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 generated tickets such as employee, auto-detect, and tickets associated with service order activity dispatches.

D. Raw Data (SDF) Records – Other

For Other Metrics:

Billing:

Supporting data is provided for the following metrics:

- [BIA] Invoice Accuracy
- [BIT] Mean Time to Deliver Invoices
- [UDDT] Usage Data Delivery Timeliness

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.

Database Update Information - None

Trunk Group Performance - None

Collocation - None

Change Management – None

E. Supporting Data User Manual (SDUM) and Schema for Other Supporting Data Files (OSDF)

The SDUM and Schema can be found at URL (http://pmap.bellsouth.com) in the Documentation/Exhibits folder.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
All	All	All	Deleted Line Sharing in SQM/SEEM Disaggregation	Line sharing is no longer a UNE
All	All	Header	Changed: Alpha/Numeric Measure Identifier to Alpha Only .	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
All	All	Data Retained	Delete Data Retained section and replace with sentence in the SQM referring to SDUM.	Formerly used to list fields needed to replicate the report but it couldn't be kept current as system changes were implemented. The current Supporting Data Users Manual (SDUM) is now automatically attached to every raw data file with detailed code so this section in the SQM is unnecessary.
All	All	SEEM Disaggregation – Analog / Benchmark	Delete entire SEEM Disaggregation section and replace with "Note" in the introduction reference to the SEEM Plan.	The SEEM Disaggregation has been removed from the SQM because it is included in the SEEM Administrative Plan, which is the more appropriate location for this information. This also eliminates the possibility of conflict between the SQM and SEEM Plans.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
SQM Plan	N/A	Introduction	The BellSouth Service Quality Measurement Plan (SQM) describes in detail the measurements produced to evaluate the quality of service delivered to BellSouth's wholesale customers ~~both wholesale and retail~~. The SQM was developed to respond to the requirements of the Communications Act of 1996 Section 251 (96 Act) which required BellSouth to provide non-discriminatory access to Competitive Local Exchange Carriers (CLEC)[1] ~~and their Retail Customers~~. The reports produced by the SQM provide regulators, CLECs and BellSouth the information necessary to monitor the delivery of non-discriminatory access. This plan results from the many divergent forces evolving from the 96 Act. ~~The 96 Act, the Georgia Public Service Commission (GPSC) Order (Docket 7892-U 12/30/97), LCUG 1-7.0, the FCC's NPRM (CC Docket 98-56 RM9101 04/17/98), the Louisiana Public Service Commission (LPSC) Order (Docket U-22252 Subdocket C 04/19/98), numerous arbitration cases, LPSC sponsored collaborative workshops (10/98-02/00), and proceedings in Alabama, Florida, Mississippi, and North Carolina have and continue to influence the SQM. Per the Order in Docket 01-00193, issued by the Tennessee Regulatory Authority on October 4, 2002, this version of the SQM reflects the Florida Public Service Commission Order Nos. PSC-02-1736-PAA-TP, issued December 10, 2002, PSC-03-0529-PAA-TP, issued April 22, 2003 and PSC-03-0603-CO-TP, issued May 15, 2003.~~ This specific SQM is based on Order No. (to be determined) in TRA Docket No. 97-00309 dated (to be determined). The SQM and the reports flowing from it must change to reflect the dynamic requirements of the industry. New measurements are added as new products, systems, and processes are developed and fielded. New products and services are added as the markets ~~for them~~ develop and the processes stabilize. The measurements ~~are also~~ will be changed to reflect the dynamic changes ~~in systems,~~ described above and to correct errors, ~~and~~ respond to ~~both~~ 3rd Party audits, ~~requirements and the Florida PSC~~ Orders of the TRA, FCC and the appropriate Courts of Law. 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 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 relieves BellSouth of the obligations to provide any UNE or UNE combination pursuant to Section 251 of the Act, then upon providing the Commission with 30 days written notice, BellSouth may cease reporting data or paying remedies in accordance with the change of law. Performance measurements and remedy plans that have been ordered by the Commission can currently be accessed via the Internet on BellSouth's PMAP website (http://pmap.bellsouth.com) in the Documentation/ Exhibits folder. Should there be any difference between the performance measurement and remedy plans on BellSouth'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. BellSouth may disregard performance data to the extent such data has been impacted by a force majeure event as that term is defined in the most recent version of BellSouth's standard interconnection agreement. This document is intended for use by someone with knowledge of the telecommunications industry, information technologies and a functional knowledge of the subject areas covered by ~~the~~ BellSouth Performance Measurements and the reports that flow from them.	The Introduction has been revised to update documentation references. Revised section to more accurately define the nature of the SQM and include references to the FCC and Courts of Law. Added a section to address the implementation schedule of the performance measurement and remedy plans after a Commission order, describes change of law provisions, and provide BellSouth PMAP website address for the location of performance measurement and remedy plans. (Revision filed with the TRA on 12/21/2004)

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

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
			Once it is approved, the most current copy of this document can be found on ~~the~~ BellSouth's PMAP website ~~at URL:~~ (http://pmap.bellsouth.com) in the Documentation/Exhibits folder.	
		Report Publication Dates	Each month, preliminary SQM reports will be posted to BellSouth's ~~SQM~~ PMAP 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 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. ~~Reports not posted by this time will be considered late for SEEM payment purposes.~~ Validated SEEM reports will be posted on the 15th of the following month or the first business day after the 15th. SEEM payments ~~due~~ will ~~also~~ be ~~paid~~made on the 15th of the following month or the first business day after the 15th. For instance: May data will be posted in preliminary SQM reports on June 21st. Final validated SQM reports will be posted on the last day of the month. Final validated SEEM reports will be posted and payments mailed on the 15th of the following month. For details on SEEM, please refer to the SEEM Administrative Plan. BellSouth shall retain the performance measurement ~~raw~~ Supporting ~~d~~Data ~~f~~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 replicating the reports in the SQM are contained in the Supporting Data User Manual (SDUM). The SDUM is available on the PMAP website and is automatically provided with each SDF download.	Clarification to existing processes. Removed the SEEM requirements to prevent the possibility of conflict with the SEEM documentation. Reference SEEM Administrative Plan for SEEM report publication information. Added as information to clarify and reflect current nomenclature.
		Report Delivery Methods	Each month, preliminary SQM reports will be posted to BellSouth's ~~SQM~~ PMAP 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 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. ~~Reports not posted by this time will be considered late for SEEM payment purposes.~~ Validated SEEM reports will be posted on the 15th of the following month or the first business day after the 15th. SEEM payments ~~due~~ will ~~also~~ be ~~paid~~made on the 15th of the following month or the first business day after the 15th. For instance: May data will be posted in preliminary SQM reports on June 21st. Final validated SQM reports will be posted on the last day of the month. Final validated SEEM reports will be posted and payments mailed on the 15th of the following month. For details on SEEM, please refer to the SEEM Administrative Plan. BellSouth shall retain the performance measurement ~~raw~~ Supporting ~~d~~Data ~~f~~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 replicating the reports in the SQM are contained in the Supporting Data User Manual (SDUM). The SDUM is available on the PMAP website and is automatically provided with each SDF download.	SRS format replaced SQM / MSS reports and reports will be considered delivered when posted to the web site. Eliminated the redundant requirement to file copies.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
OSS	~~OSS-1~~		Delete Average Response Interval and Percent within Interval	Removed this measure to streamline the measurement plan. This measure provides minimal information about the level of performance. These are electronic pre-ordering transactions with intervals measured in seconds. The relevant issue is whether systems are operating which is measured in OSS-2. If systems are working, even if there are differences of a few seconds between wholesale and retail preordering responses, they are inconsequential. Further OSS-2 was modified to monitor degraded service and partial outages as well, so any system degradation can be monitored in that revised measure.
	IA: Interface Availability (Pre-Ordering / Ordering)	Title	~~OSS-2~~ IA: Interface Availability (Pre-Ordering/Ordering)	Consistent nomenclature throughout the interface measures
		Definition	~~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.)~~ This measure captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. "Functional Availability" is defined as the number of hours in the reporting period the applications/interfaces are available to users. "Scheduled Availability" is defined as the number of hours in the reporting period the applications/interfaces are scheduled to be available. Scheduled availability is posted on the Interconnection website~~:~~ (http://www.interconnection.bellsouth.com/oss/oss_hour.html).	Wording clarification
		Exclusions	• CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc. • ~~Degraded service outages which are defined as a critical function that is normally performed by the CLEC or is normally provided by an application or system available to the CLEC, but with significantly reduced response or processing time.~~ • ~~Scheduled OSS Maintenance~~	Degraded service outages will now be reflected in one version of the measure and in the total outage calculation. Deleted this exclusion since it is redundant. This time is already excluded from the measure by definition.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	~~This measurement captures the functional~~ The Interface Availability (Full Outages) calculations are based upon availability of applications and ~~/~~interfac ing~~es~~ applications utilized by CLECs for pre-ordering and ordering~~as a percentage of scheduled availability for the same systems~~. ~~Only full and Loss of Functionality outages are included in the calculation for this measure.~~ Types of outages are defined as follows: • Full outages are defined as occurrences of either of the following: - Application/Interface application is down or totally inoperative - Application is totally inoperative for customers attempting to access or use the application (this includes transport outages when they may be directly associated with a specific application) • Partial Loss of Functionality outages are ~~defined~~ incurred ~~as: A critical function that is normally performed by the CLEC or is normally provided by an application or system is temporarily unavailable to the CLEC.~~ when any function the customer normally performs or a function normally provided by an application or system is unavailable to any customer. • Degraded Service is defined as occurrences of either of the following: - When the application or system is known by any IT organization to be processing 20% or more below normal capacity - When 20% or more of the clients experience slow response from the system or application Total Outages include Full Outages, Degraded Services and Loss of Functionality minutes, and will be calculated for diagnostic purposes. ~~Comparison to an internal benchmark provides a vehicle for determining whether or not CLECs and retail BellSouth entities are given comparable opportunities for use of pre-ordering and ordering systems.~~ ~~(Note: Scheduled maintenance will not be performed between the hours of 8:00 a.m through 9:00 p.m. Monday through Friday.)~~	The changes create a two part measure that will continue to report full outages as BellSouth does today, and add a result that includes degraded service and loss of functionality in addition to full outages as a diagnostic measure. Only full outages will be considered for SEEM/SQM performance compliance and for determining the overall performance level to determine the appropriate SEEM schedule to apply. Defines terms. Included BellSouth's IT definition for degraded service. Removed irrelevant statement. Removed note because the SQM does not determine the scheduled hours of operation. Hours of scheduled maintenance is a business practice and is addressed in the CLEC Ordering Guide.
		Calculation	~~**OSS**~~ **Interface Availability (Pre-Ordering/Ordering)** ~~= (a / b) X 100~~ **Interface Availability (Full Outages)** = (a – b) / a X 100 ▪ a = ~~Functional~~ Scheduled Availability Minutes ▪ b = ~~Scheduled Availability~~ Full Outage Minutes **Interface Availability (Total Outages)** = [a - (b + c + d)] / a X 100 ▪ c = Loss of Functionality Minutes ▪ d = Degraded Service Minutes	Clarify full outage calculation Added Total Outage calculation as described in the Business Rules

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	~~Interface Type~~ ~~Not CLEC Specific~~ Legacy System/Interface Specific ~~Not Product/Service Specific~~ Geographic Scope - Region~~al~~ ~~Level~~	Report Structure changed to more clearly reflect the output report.
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** **SQM Analog/Benchmark** Interface Availability (Full Outages) ~~Regional Level, Per OSS Interface~~ >= 99.5% Interface Availability (Total Outages)..... Diagnostic **~~(See Appendix D: Tables for SQM OSS Availability)~~**	Removed the redundant language for Full Outage and added Total Outage. Whern the interface is available but there is degraded service, the CLEC can still access the interface and there may be little or no impact on a CLEC dependent on the value and frequency that the impaired functionality would be utilized by the CLEC. Consequently, the results do not give a valid basis to evaluate system performance. Modified Appendix D to list current applications captured in measurement. Also to delete tables for deleted measures OSS-1 and OSS-4.
	MRIA: Interface Availability (Maintenance & Repair)	Title	~~OSS 3~~ MRIA: ~~OSS~~ Interface Availability (Maintenance & Repair)	Consistent nomenclature throughout the interface measures
		Definition	~~Percent of time applications are functionally available as compared to scheduled availability. Calculations are based upon availability of applications and interfacing applications utilized by CLECs for maintenance and repair.~~ This measurement captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. "Functional Availability" is defined as the number of hours in the reporting period ~~that~~ the applications/interfaces are available to users. "Scheduled Availability" is defined as the number of hours in the reporting period ~~that~~ the applications/interfaces are scheduled to be available. Scheduled availability is posted on the Interconnection website~~:~~ (http://www.interconnection.bellsouth.com/oss/oss_hour.html).	Wording clarification

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Exclusions	▪ CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc. ▪ ~~Degraded service outages which are defined as a critical function that is normally performed by the CLEC or is normally provided by an application or system available to the CLEC, but with significantly reduced response or processing time~~	Delete exclusion for Degraded service. Degraded service outages will now be reflected in one version of the measure.
		Business Rules	~~This measurement captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems.~~ The Interface Availability (Full Outages) calculations are based upon availability of applications and interfacing applications utilized by CLECs for maintenance and repair. ~~Only full outages are included in the calculations for this measure.~~ Types of outages are defined as follows: • Full outages are defined as occurrences of either of the following: - Application/Interface application is down or totally inoperative - Application is totally inoperative for customers attempting to access or use the application (this includes transport outages when they may be directly associated with a specific application) • Partial Loss of Functionality outages are ~~defined~~ incurred ~~as: A critical function that is normally performed by the CLEC or is normally provided by an application or system is temporarily unavailable to the CLEC.~~ when any function the customer normally performs or a function normally provided by an application or system is unavailable to any customer. • Degraded Service is defined as occurrences of either of the following: - When the application or system is known by any IT organization to be processing 20% or more below normal capacity - When 20% or more of the clients experience slow response from the system or application Total Outages include Full Outages, Degraded Services and Loss of Functionality minutes, and will be calculated for diagnostic purposes. ~~Comparison to an internal benchmark provides a vehicle for determining whether or not CLECs and retail BellSouth entities are given comparable opportunities for use of maintenance and repair systems.~~	The changes create a two part measure that will continue to report full outages as BellSouth does today, and add a result that includes degraded service and loss of functionality in addition to full outages as a diagnostic measure. Only full outages will be considered for SEEM/SQM performance compliance and for determining the overall performance level to determine the appropriate SEEM schedule to apply. CLECs maintain access to the interface with degraded service. Included BellSouth's IT definition for degraded service. Removed irrelevant statement

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Calculation	~~**OSS**~~ **Interface Availability (M&R)** ~~(a / b) X 100~~ **Interface Availability (Full Outages)** = (a – b) / a X 100 • a = ~~Functional~~ Scheduled Availability Minutes • b = ~~Scheduled Availability~~ Full Outage Minutes **Interface Availability (Total Outages)** = [a - (b + c + d)] / a X 100 • c = Loss of Functionality Minutes • d = Degraded Service Minutes	Clarify full outage calculation Added Total Outage calculation as described in the Business Rules Only full outages will be considered for SEEM/SQM main calculation. CLECs maintain access to the interface with degraded service.
		Report Structure	~~Interface Type~~ ~~Not CLEC Specific~~ ~~Not Product/Service Specific~~ ▪ Legacy System/Interface Specific ▪ Geographic Scope - Region~~al~~ ~~Level~~	Report Structure changed to more clearly reflect the output report.
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** **SQM Analog/Benchmark** Interface Availability (Full Outages) ~~Regional Level, Per OSS Interface~~ >= 99.5% Interface Availability (Total Outages).....Diagnostic ~~**(See Appendix D: Tables for SQM OSS Availability M&R)**~~	Removed the redundant language for Full Outage and added Total Outage. Whern the interface is available but there is degraded service, the CLEC can still access the interface and there may be little or no impact on a CLEC dependent on the value and frequency that the impaired functionality would be utilized by the CLEC. Consequently, the results do not provide a valid basis to evaluate system performance. Modified Appendix D to list current applications captured in measurement. Also to delete tables for deleted measures OSS-1 and OSS-4.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	~~OSS-4~~		Delete Response Interval (Maintenance & Repair)	Removed of this measure to streamline the measurement plan. The TAFI boxes cannot distinguish between the CLEC request and the BST request; therefore both get the same treatment. This measure provides minimal information about the level of performance. These are electronic queries to the maintenance and repair systems for transactions with intervals measured in seconds. The relevant issue is whether systems are operating which is measured in MRIA. Even if there are differences of a few seconds between wholesale and retail maintenance transactions, they are inconsequential. Further, OSS-3, now MRIA was modified to monitor degraded service and partial outages as well so any system degradation can be monitored in that measure.
	~~(PO-1)~~		Delete Loop Makeup – Response Time – Manual	Removal of this measure to streamline the measurement plan. Delete measure Based on low volume and low impact
	ERT: Loop Makeup – Response Time - Electronic	Title	~~(PO-1)~~ ERT: Loop Makeup – Response Time - Electronic	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
		Definition	This report measures the ~~average interval and the~~ percent within the interval from the electronic submission of a Loop Makeup Service Inquiry (LMUSI) to the distribution of Loop Makeup information back to the CLEC.	Streamline the measurement plan by removing inconsequential data. Only the percent of response returned within the interval is used for monitoring performance. Average interval is simply another way to state this performance.
		Exclusions	• Manually Submitted Inquiries • Canceled Requests • Scheduled OSS Maintenance • Test Transactions/Records	BellSouth should not be penalized for necessary maintenance downtime. Add exclusion for test records. Test records do not impact CLECs.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	The response interval starts when the CLEC's Mechanized Loop Makeup Service Inquiry (LMUSI) is submitted electronically through the ~~Operational Support Systems~~ ordering interface~~,~~ ~~TAG~~ gateways. It ends when BellSouth's Loop Facility Assignment and Control System (LFACS) responds electronically to the CLEC with the requested Loop Makeup data via the ~~TAG~~ ordering interface gateways. ~~LSRs submitted via LENs will be reflected in the results for the TAG interface.~~ **Note**: The Loop Makeup Service Inquiry Form does not require the CLEC to furnish the type of Loop. The CLEC determines whether the loop makeup will support the type of service they wish to order ~~or not~~ and qualifies the loop. If a CLEC concludes that the loop makeup will support the service, and wants to order it, an ~~firm order~~ LSR ~~is~~ must be submitted by the CLEC. ~~EDI is not a pre-ordering system, and, therefore, is not applicable in this measure.~~	This allows consistent reflection of the gateway name as technology moves forward by making business rules generic instead of referencing specific systems. Clarify wording. Remove statement about EDI as EDI now has preordering capability.
		Calculations	**Response Interval** = (a - b) • a = Date and time the LMUSI returned to CLEC • b = Date and time the LMUSI is received ~~**Average Interval** = (c / d)~~ ~~• c = Sum of all response intervals~~ ~~• d = Total number of LMUSIs received within the reporting period~~ **Percent within Interval** = ~~(e / f)~~ (c / d) X 100 • ~~e~~ c = Total LMUSIs received within the interval • ~~f~~ d = Total number of LM USIs processed within the reporting period	Only the % within interval calculations is used to monitor performance so the Average Interval calculation is unnecessary.
		Report Structure	• CLEC Aggregate • CLEC Specific • Geographic Scope - State ~~- Region~~ • Interval for electronic LMUSIs: 0 – <= 1 minute ~~>1 – <= 5 minutes~~ ~~0 – <= 5 minutes~~ ~~> 5 – <= 8 minutes~~ ~~> 8 – <= 15 minutes~~ ~~> 15 minutes~~ ~~• Average Interval in minutes~~	Performance is evaluated by state so a regional report is unnecessary. Changed acronym for consistency throughout the measure Interval buckets are no longer reasonable given the current intervals. There is no need to continue to break down data to this level of detail, especially when the CLECs can separate data into any interval buckets they choose via the raw data. Average Interval is no longer calculated..

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	**SQM Disaggregation - Analog/Benchmark** **SQM Level of Disaggregation** — **SQM Analog/Benchmark** Loops ..... Benchmark: 95% <= 1 Minute	
	BMRT : UNE Bulk Migration – Response Time	Title	BMRT: UNE Bulk Migration - Response Time	This is a new measure that was filed in the Tennessee TRO hearing to address a new process that may have considerable volume.
		Definition	This report measures the average interval and percent within the interval from the submission of a UNE Bulk Migration Notification Form to the distribution of Bulk Notification Form, including negotiated due date back to the CLEC.	
		Exclusions	• Projects not identified as UNE Bulk Migration • Weekends and holidays • Canceled Requests	Only Bulk Migration orders are included in the measure by definition. BellSouth should not be penalized for time that center is closed. No response is provided on canceled requests.
		Business Rules	The CLEC Bulk Migration process includes the submission of a Bulk Migration Notification Form to BellSouth via email. The project manager negotiates due date, assigns Bulk Order Package Identification (BOPI) number, and validates related PONs in the Bulk package. BellSouth then returns the Bulk Notification Form, including negotiated due date to the CLEC. The "Receive Date" is defined as the date the Bulk Migration Notification Form is received by the BellSouth Project Manager via email. It is counted as day zero. Bulk Migration "Return Date" is defined as the date BellSouth returns a response. The interval calculation is reset to zero when a CLEC initiated change occurs on the Bulk Migration Notification Form. This measurement combines three sub-metrics: 1. From receipt of a valid Bulk Migration Notification Form (up to 99 individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC. 2. From receipt of a valid Bulk Migration Notification Form (100 up to 200 individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC. 3. From receipt of a valid Bulk Migration Notification Form (201 or more individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC.	

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Calculation	**Response Interval** = (a - b) • a = Date BellSouth returns a response • b = Date the Bulk Migration Notification Form is received **Average Interval** = (c / d) • c = Sum of all response intervals • d = Total number of Bulk Migration Notification Forms received within the reporting period **Percent within Interval** = (e / f) X 100 • e = Total Bulk Migration Notification Forms received within the interval • f = Total number of Bulk Migration Notification Forms processed within the reporting period	
		Report Structure	• CLEC Aggregate • CLEC Specific • Geographic Scope - State • Intervals for manual Bulk Migration Notification Forms: 0 - <= 99 individual telephone numbers - 0 – <= 4 Business days - > 4 Business days 100 - <= 200 individual telephone numbers - 0 - <= 6 Business days - > 6 Business days >= 201 individual telephone numbers • Average Interval in days	This is a new measure that was filed in the Florida TRO hearing to address a new process that may have considerable volume. The structure is consistent with the way that the service is offered.
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** — **SQM Analog/Benchmark** • 0 - <= 99 individual telephone numbers ..... Benchmark: 95% <= ~~3~~ 4 Business Days • 100 - <= 200 individual telephone numbers ..... Benchmark: 95% <= ~~5~~ 6 Business Days • >= 201 individual telephone numbers ..... Benchmark: Diagnostic	Benchmarks were established to equal the intervals stated in the product offering. >= 201 individual telephone numbers does not have a standard interval
		SEEM Measure	**SEEM Tier I Tier II** No	This process has little if any end user customer impact. It is simply a process that allows CLECs to organize large volume migrations from UNE-P to UNE-L.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
Ordering	~~O-1~~		Delete Acknowledgement Message Timeliness	Removed this measure to streamline the measurement plan. This measure is of minimal use to evaluate performance. An acknowledgement is simply an electronic signal that tells a CLEC's computer that a transaction was successfully received. The relevant issue is whether the acknowledgement was sent, which is measured by AKC (O-2). If sent, measuring a few seconds of duration is irrelevant.
	AKC: Acknowledgement Message Completeness	Title	~~O-2~~ AKC : Acknowledgement Message Completeness	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
		Definition	This measure~~ment~~ provides the percent of ~~Messages~~ transmissions/LSRs received via ~~EDI or TAG~~ ordering interface gateways, which are acknowledged electronically.	Wording clarification Received requests are not referred to as Messages Change to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems.
		Exclusions	• Manually Submitted LSRs • Test Transactions/Records	Performance on test transactions does not affect CLECs.
		Business Rules	~~EDI and TAG~~ Ordering interface gateways send Functional Acknowledgements for all transmissions/LSRs, which are electronically submitted by a CLEC. ~~For those CLECs using~~ Users of EDI~~,~~ may package many LSRs from multiple states in one transmission. ~~I~~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. ~~The Acknowledgement Message is returned prior to the determination of whether the LSR will be partially mechanized or fully mechanized.~~	Wording clarification Change to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems. Removed irrelevant note
		Calculation	**Acknowledgement Completeness** = (a / b) X 100 • a = Total number of Functional Acknowledgements returned in the reporting period for ~~Messages~~ transmissions/LSRs electronically submitted by ~~EDI or TAG~~ ordering interface gateways respectively • b = Total number of electronically submitted ~~Messages~~ transmissions/LSRs received in the reporting period by ~~EDI or TAG~~ ordering interface gateways respectively	Wording clarification Received requests are not referred to as Messages Change to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	• CLEC Aggregate • CLEC Specific • Geographic Scope - Region ~~Note: Acknowledgement Message is generated before the system recognizes whether this message (LSR) will be partially or fully mechanized.~~	Removed irrelevant note.
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** — **SQM Analog/Benchmark** • ~~EDI~~ Acknowledgments ..... Benchmark: 99.~~9~~ 5% • ~~TAG ..... Benchmark: 99.5%~~	There is no need to separate interface types in Disaggregation 99.9% benchmark is not a reasonable expectation nor is it necessary as a minimum service level to ensure non-discrimination.
		SEEM Measure	**SEEM** — **Tier I** — **Tier II** Yes ..... ~~X~~ X	See SEEM matrix for rationale.
	PFT: Percent Flow-Through Service Requests	Title	~~O-3~~ PFT: Percent Flow-Through Service Requests ~~(Summary)~~	Removed the word Summary in order to combine this measure with O-4
		Definition	The percentage of Local Service Requests (LSRs) and Local Number Portablity ~~Local Service Requests (LNP LSRs)~~ submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued, without manual intervention.	Wording clarification
		Exclusions	• Fatal Rejects • Auto Clarification • Planned Manual Fallout ~~for Percent Flow-Through only~~ • CLEC System Fallout • ~~Scheduled OSS Maintenance~~ • Test Transactions/Records • LSR that received a Z Status	To agree with Field name on output report This is not an interval measure that needs to exclude scheduled downtime Only account for those records that are CLEC impacting Z status is assigned to original requests that are supped before receiving a response so they do not have the opportunity to Flow Through

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) ~~which are~~ submitted through one of the ~~three gateway interfaces~~ mechanized ordering interface gateways ~~(TAG, EDI and LENS)~~, 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). ~~**Definitions:**~~ **Fatal Rejects:** Errors that prevent an LSR, submitted electronically by the CLEC, from being processed ~~further~~ initially. When an LSR is submitted by a CLEC, source systems ~~LEO/LNP Gateway~~ 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 ~~LEO/LNP Gateway~~ will reject the LSR and the CLEC will receive a Fatal Reject. **Auto-Clarification:** Clarifications that are mechanically returned to the CLEC ~~occur~~ due to invalid data entry within the LSR. Edits contained within the source systems ~~LESOG/LAUTO~~ will perform data validity checks to ensure the data within the LSR is complete ~~correct~~ and accurate ~~valid~~. 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. Planned **Manual Fallout*:** ~~Planned~~ 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 ~~LESOG/LAUTO~~ will determine if the LSR should be forwarded to LCSC for manual handling. ~~Following are the categories for Manual Fallout:~~ ~~1. Complex*~~ ~~2. Special pricing plans~~ ~~3. Some Partial migrations (All LNP Partial Migrations)~~ ~~4. New telephone number not yet posted to BOCRIS~~ ~~5. Pending order review required~~ ~~6. CSR inaccuracies such as invalid or missing CSR data in CRIS~~ ~~7. Expedites (requested by the CLEC)~~ ~~8. Denials-restore and conversion, or disconnect and conversion orders~~ ~~9. Class of service invalid in certain states with some types of service~~ ~~10. Low volume such as activity type "T" (move)~~ ~~11. More than 25 business lines, or more than 15 loops~~ ~~12. Transfer of calls option for the CLEC end users~~ ~~13. Directory Listings (Identions and Captions)~~ ~~14. LNP Only – Supplement LSRs except supps of O-2 (Due Date Changes) on Req Type CB~~	Wording changes to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems and other clarifications. Wording Change to include interface for xDSL ordering It is not practical to maintain a list of Planned manual Fallout accurately and completely in the SQM as new products are introduced and mechanization occurs. This information will be available on the PMAP website.

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Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
			See LSR Flow-Through Matrix ~~in Appendix E~~ on BellSouth's PMAP 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. ~~The matrix is updated automatically when new services are added or the systems are improved to allow a service to flow through. The current version of the Flow-Through Matrix is on the PMAP website (http://pmap.bellsouth.com) in the Documentation/Exhibits folder. Any change in the flow-through order category from flow-through to non-flow-through shall require prior Commission approval.~~ **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 will be sent back to the CLEC for clarification. If it is determined the error is due to BellSouth ~~caused~~ system functionality, the LCSC representative will correct the error~~,~~ and the LSR will continue to be processed. **Z Status:** LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR.	Remove Flow Through Matrix from SQM and provide PMAP website address where it can be found. This facilitates keeping the matrix up to date. Currently the matrix is only updated by filing revised SQM pages which is impractical.
		Calculation	**Percent Flow Through** = a / [b - (c + d + e + f)] X 100 a = The total number of LSRs that flow through ~~LESOG/LAUTO~~ the source systems and reach a status for a FOC to be issued b = The number of LSRs that passed the basic system edits and are accepted for further service order processing ~~from LEO/LNP Gateway to LESOG/LAUTO~~ c = The number of LSRs that fallout for planned manual processing d = The number of LSRs that are returned to the CLEC for auto clarification e = The number of LSRs that are returned to the CLEC from the LCSC due to CLEC ~~clarification~~ data entry error f = The number of LSRs that receive a Z status ~~**Percent Achieved Flow Through** = a / [b - (c + d + e)] X 100~~ ~~a = The number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued.~~ ~~b = The number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO~~ ~~c = The number of LSRs that are returned to the CLEC for auto clarification~~ ~~d = The number of LSRs that are returned to the CLEC from the LCSC due to CLEC clarification~~ ~~e = The number of LSRs that receive Z status~~	Wording changes to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems. Wording changes for clarification Delete calculation not used to monitor performance and does not measure system performance. The data is provided that enables CLECs to calculate this result if they want to see it.
		Report Structure	• CLEC Specific • CLEC Aggregate • Geographic Scope - Region	Combined O-3 and O-4 by adding CLEC Specific to report structure. Include omitted heading.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	~~• Residence ..... Benchmark: 95%~~ ~~• Business ..... Benchmark: 90%~~ • UNE ~~– Loops~~ ..... Benchmark: 85% ~~• UNE-P ..... Benchmark: 90%~~ • Resale ..... Benchmark: 90% • LNP ..... Benchmark: 85%	Residence Benchmark is currently 95% and Business is currently 90%. BellSouth proposed to combine into one disaggregation and utilize the 90% benchmark for Resale. This level of Flow through is sufficient to allow CLECs to compete as experience has shown UNE-P disaggregation has been folded into UNE. No reason to treat UNE-P different from other UNEs.
			Notes The Flow-Through Error Analysis will be posted with the Flow-Through report. The Flow-through Error Analysis provides an analysis of each error type (by error code) that was experienced by the LSRs that did not flow through or reached a status for a FOC to be issued. The CLEC LSR information (a.k.a. LSR Detail Report) is available by subscription. A CLEC wishing to receive a copy of their report should submit a feedback form (see link located in the "Resources" section on left side of PMAP website) Enter the name of the report in the Comments section.	
	~~O-4~~		Delete Percent Flow-through Service Requests (Detail)	This data is now provided as part of the new measure PFT
	~~O-4~~		Delete Flow Through Error Analysis	This is not a measurement. BellSouth will continue to post this information as part of the Flow-Through (PFT) report. (see new note above in PFT)
	~~O-6~~		Delete CLEC LSR Information	This should be deleted from the SQM because it is not a measure, it is provided as information. BellSouth will continue to make the data available to CLECs who elect to subscribe to it. CLECs can request it via the PMAP web site. (see new note above in PFT)
	~~O-7~~		Delete Percent Rejected Service Requests	This measure only provides a view of the percentage of CLEC requests that were rejected and can be ascertained by reviewing data from Reject Interval (RI). This measure does not provide any information about performance.
	RI: Reject Interval	Title	~~O-8~~ RI: Reject Interval	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.

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Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Definition	~~Reject~~ ~~The i~~Interval ~~is the average reject~~ for the return of a reject is the response time from the receipt of a service request [~~(~~Local Service Request~~s~~ (LSR~~s~~) or Access Service Request~~s~~ (ASR~~s~~)] to the distribution of a reject. ~~Service Requests are considered valid when they are 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 version of an LSR, the first reject issued is used for the calculation of the interval duration.~~	Wording clarification It is more appropriate to address Multiple rejects on a single version of an LSR in the Business Rules so the statement has been moved to that section.
		Exclusions	• Service requests canceled by CLEC prior to being rejected/clarified • Fatal Rejects ~~• Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only.~~ • LSRs which are identified ~~and classified~~ as "Projects" with the exception of valid "Project IDs" for UNE-P to UNE Loop Bulk Migration ~~Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website: http://www.interconnection.bellsouth.com/centers/html/lcsc.html~~ ~~Local Interconnection Service Center (LISC) - Monday through Friday 4:30 PM until 8:00 AM From 4:30 PM Friday until 8:00 AM Monday~~ ~~The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.~~ ~~The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.~~ ~~In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.~~ • Scheduled OSS Maintenance • Test Transaction/Records	To identify that LSRs associated with TRO Bulk Migrations of UNE-P to UNE-L will not be excluded from the measure Delete Center specific hours. Specific center hours, such as the LISC, should not be in the SQM because operational hours change dynamically based on the demands of the business. Additionally, CLECs are notified well in advance of any hours of operation for the centers through the Carrier Notification process. Clearer generic language is included in the Business Rules section. BellSouth should not be penalized for scheduled OSS maintenance Test transactions don't affect CLECs and should not be included

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	~~The Reject interval is determined for each rejected LSR processed during the reporting period. The Reject interval is the elapsed time from when BellSouth receives LSR (date and time stamps in EDI or TAG) until that LSR is rejected back to the CLEC. Elapsed time for each LSR (date and time stamps in EDI or TAG) is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of rejected LSRs to produce the reject interval distribution.~~	
			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.	Moved from Definition section
			Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ~~EDI translator, or TAG~~ ordering interface gateways) until the LSR is rejected (date and time stamp ~~or~~ of reject in ~~EDI translator, or TAG~~ ordering interface gateways). Auto Clarifications are considered in the Fully Mechanized category.	Wording changes to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems.
			Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ~~EDI translator, or TAG~~ ordering interface gateways) ~~until it~~ which falls out for manual handling~~. The stop time on partially mechanized LSRs is when~~ until the LCSC Service Representative clarifies the LSR back to the CLEC via ~~EDI translator, or TAG~~ ordering interface gateways.	
			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 ~~mailed~~ paper LSRs ~~is~~ are received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via ~~LON~~ FAX Server.	Clarification of business rules for non-mechanized LSRs
			Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the ~~Local Interconnection Service Center (LISC)~~ Carrier Interconnection Switching Center (CISC). ~~Trunks data is reported as a separate category.~~	Updated name of center processing ASRs for Local Interconnection Trunks
			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).	Provided web address for hours of operations which are clearly defined on the Interconnection web site.
			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.	Provides Business Rules and definitions for the components of the new Bulk Migration process.

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Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Calculation	**Reject Interval** = (a - b) • a = Date and time of service request rejection • b = Date and time of service request receipt ~~**Average Reject Interval** = (c / d)~~ ~~• c = Sum of all reject intervals~~ ~~• d = Number of service requests rejected in reporting period~~ ~~**Reject Interval Distribution**~~ **Percent within Interval** = ~~(e / f)~~ (c / d) X 100 • ~~e~~ c = Service requests rejected in reported interval • ~~f~~ d = Total ~~number of~~ service requests rejected in report~~ing~~ period	Removal of inconsequential data. Average Reject Interval is not used to monitor performance and is simply another way to state performance. Changes made to the calculations for Reject Interval provide only the calculation that is monitored.
		Report Structure	One report with the following four Disaggregation Levels and their associated interval buckets: • Fully Mechanized: ~~0 - <= 4 minutes~~ ~~> 4 - <= 8 minutes~~ ~~>8 - <= 12 minutes~~ ~~> 12 - <= 60 minutes~~ 0 - <= 1 hour ~~> 1 - <= 4 hours~~ ~~> 4 - <= 8 hours~~ ~~> 8 - <= 12 hours~~ ~~> 12 - <= 16 hours~~ ~~> 16 - <= 20 hours~~ ~~> 20 - <= 24 hours~~ ~~> 24 hours~~ • Partially M echanized: ~~0 - <= 1 hour~~ ~~> 1 - <= 4 hours~~ ~~> 4 - <= 8 hours~~ ~~> 8 - <= 10 hours~~ 0 - <= 10 hours ~~> 10 - <= 18 hours~~ ~~0 - <= 18 hours~~ ~~> 18 - <= 24 hours~~ ~~> 24 hours~~	Single Interval buckets for Fully Mechanized, Partially Mechanized and Non-Mechanized based on the benchmark. Interval buckets are no longer reasonable given the current intervals. There is no need to continue to break down data to this level of detail, especially when the CLECs can separate data into any interval buckets they choose via the raw data.

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Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
			• Non-Mechanized: ~~0 - <= 1 hour~~ ~~> 1 - <= 4 hours~~ ~~> 4 - <= 8 hours~~ ~~> 8 - <= 12 hours~~ ~~> 12 - <= 16 hours~~ ~~> 16 - <= 20 hours~~ ~~> 20 - <= 24 hours~~ ~~0 - <= 24 hours~~ ~~> 24 hours~~ 0 - <= 18 hours • Local Interconnection Trunks: 0 - <= 4 days ~~0 - <= 36 hours~~ ~~> 36 hours~~ • ~~Average Interval is reported in business hours.~~ • CLEC Specific • CLEC Aggregate • Geographic Scope - State - ~~Region~~	Single Interval buckets for Fully Mechanized, Partially Mechanized and Non-Mechanized and Local Interconnection Trunks based on the benchmark. Average Interval is no longer reported

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Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** — **SQM Analog/Benchmark** • ~~Resale – Residence~~ Fully Mechanized ..... ~~Fully Mechanized:~~ 97% <= 1 Hour • ~~Resale – Business~~ Partially Mechanized ..... ~~Partially Mechanized:~~ ~~95~~ 90% <= 10 Hours • ~~Resale – Design (Special)~~ Non-Mechanized ..... ~~Non Mechanized:~~ ~~95~~ 85% <= ~~24~~ 18 Hours • ~~Resale PBX~~ • ~~Resale Centrex~~ • ~~Resale ISDN~~ • ~~LNP (Standalone)~~ • ~~INP (Standalone)~~ • ~~2W Analog Loop Design~~ • ~~2W Analog Loop Non-Design~~ • ~~2W Analog Loop with INP Design~~ • ~~2W Analog Loop with INP Non-Design~~ • ~~2W Analog Loop with LNP Design~~ • ~~2W Analog Loop with LNP Non-Design~~ • ~~UNE Digital Loop < DS1~~ • ~~UNE Digital Loop >= DS1~~ • ~~UNE Loop + Port Combinations~~ • ~~UNE Combination Other~~ • ~~UNE ISDN Loop~~ • ~~UNE Other Design~~ • ~~UNE Other Non-Design~~ • ~~UNE Line Splitting~~ • ~~EELs~~ • ~~Switch Ports~~ • ~~UNE xDSL (ADSL, HDSL, UCL)~~ • ~~Line Sharing~~ • ~~Local Interoffice Transport~~ • Local Interconnection Trunks..... ~~Trunks:~~ ~~95~~ 85% <= ~~36 Hours~~ 4 Days	The changes to the Benchmarks were made for two reasons. First, BellSouth is attempting to create a Regional SQM Plan to assimilate different benchmarks across the various state SQMs and create a 'regional' benchmark since the center processing the LSRs is a regional center. For example, for Partial Mechanized LSRs, BellSouth currently has benchmarks of 85% in 10 hours, 95% in 12 hours, 90% in 7 hours and 95% in 10 hours across the BellSouth region. In an effort to obtain a 'regional' benchmark, 90% in 10 hours was proposed. For Non-Mechanized LSRs, BellSouth currently has a range of 85% in 24 hours to 95% in 24 hours. BellSouth is proposing 85% in 18 hours. For LIT, the majority of the states have 85% in 4 days, and that is BellSouth's proposal here as well. Second, as the volume of fully mechanized LSRs increases, the volume for partially and non-mechanized LSRs will continue to decrease. Thus, the records in these two categories will be more complex in nature which will take longer to process. BellSouth's analysis shows that for May 2004, of the over 250K LSRs received for Florida, 82% of the LSRs were fully mechanized, and that partially mechanized and non-mechanized accounted for the remaining 14% and 4% of the LSRs respectively. As this trend continues, the benchmarks should be modified to be consistent with the fact that the partially mechanized and non-mechanized LSRs will become increasingly more complicated BellSouth proposes no change to the benchmark; however, this measure is not particularly sensitive to product type so product disaggregation actually reveals little, if any information, about performance quality. Additionally, BellSouth proposes to eliminate reporting of multiple products under mechanization level because many of the products have little or no monthly volume. The benchmarks for this measure are set based on the level of mechanization, not by individual products. Raw data will provide drill down to the product level.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	FOCT: Firm Order Confirmation Timeliness	Title	~~O-9~~ FOCT: Firm Order Confirmation Timeliness	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
		Definition	The i~~I~~nterval for return of a Firm Order Confirmation (FOC ~~Interval~~) is the ~~average~~ response time from the receipt of a valid Access Service Request (ASR)/Local Service Request (LSR) ~~or ASR~~ to distribution of a FOC ~~Firm Order Confirmation~~. ~~The interval will include an electronic facilities check.~~	This is an Ordering measure and the interval should stop once the order is issued error free and the FOC is sent. The requirement to check facility availability is a business practice that should be addressed in Interconnection Agreements, not in the SQM.
		Exclusions	• Service Requests canceled by CLEC prior to a FOC being ~~confirmed~~ returned • Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only • LSRs which are identified ~~and classified~~ as "Projects" with the exception of valid "Projects IDs" for /UNE-P to UNE Loop Bulk Migrations ~~Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website: http://www.interconnection.bellsouth.com/centers/html/lcsc.html~~ ~~For ASRs processed in the Local Interconnection Service Center (LISC) – From 4:30 PM All hours outside of Monday – Friday 8:00 AM – 4:30 PM CST, should be excluded.~~ ~~The hours excluded will be altered to reflect changes in the Center operating hours. The Centers will accept faxed LSRs only during posted hours of operation.~~ ~~The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.~~ ~~In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.~~ • Test Transactions/Records • Scheduled OSS Maintenance	Modified Project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations, although considered a project, will not be excluded from the measurement. Bulk Migrations are unique in that they have standard intervals even though they are projects and are distinguishable from other projects. Consequently, these projects orders are included in the results. Delete Center specific hours. Specific center hours, such as the LISC, should not be in the SQM because operational hours change dynamically based on the demands of the business. Additionally, CLECs are notified well in advance of any hours of operation for the centers through the Carrier Notification process. Clearer generic language is included in the Business Rules section. BellSouth should not be penalized for scheduled OSS maintenance Test transactions don't affect CLECs and should not be included

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	When multiple FOCs occur on a single LSR/ASR, the first FOC is used to measure the interval. **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ~~EDI or TAG~~ ordering interface gateways) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via ~~EDI translator or TAG~~ ordering interface gateways. **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ~~EDI, or TAG~~ ordering interface gateways) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via ~~EDI translator or TAG~~ ordering interface gateways. **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) until appropriate service orders are issued by a BellSouth 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 ~~LON~~ FAX Server. **Local Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the ~~Local Interconnection Service Center (LISC)~~ Carrier Interconnection Switching Center (CISC). ~~The elapsed time is measured from receipt of a valid ASR (date and time stamp of a FAX or paper ASR received in the LISC) until the appropriate orders are issued by a BellSouth representative and a FOC issued in EXACT. Trunk data is reported as a separate category.~~ ~~Note: When multiple FOCs occur on a single version of an LSR, the first FOC is used to measure the interval.~~ 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). **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.	Language moved from later in section. Wording changes to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems. Updated name of center processing ASRs for Local Interconnection Trunks. Removed redundant language since ASR is included in measure definition. Moved note to beginning of Business Rules Clearer language to continue existing non-business hours exclusion. Specific hours have been removed from the SQM because they change as business requirements change. Provided web address for hours of operations which are clearly defined on the Interconnection web site. Retail and Wholesale hours will remain equal. Provides Business Rules and definitions for the components of the new Bulk Migration process.

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Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Calculation	**Firm Order Confirmation Interval** = (a - b) • a = Date and time of Firm Order Confirmation • b = Date and time of service request receipt ~~**Average FOC Interval** = (c / d)~~ • ~~c = Sum of all Firm Order Confirmation Times~~ • ~~d = Number of service requests confirmed in reporting period~~ ~~**FOC Interval Distribution**~~ **Percent within Interval** = ~~(e / f)~~ (c / d) X 100 • ~~e~~ c = Service requests confirmed in ~~designated~~ reported interval • ~~f~~ d = Total service requests confirmed in the report~~ing~~ period	Removal of inconsequential data. Average FOC Interval is not used to monitor performance and is simply another way to state performance. Changes made to the calculations for FOC Interval provide only the calculation that is monitored and supports the benchmark.
		Report Structure	One report with the following four Disaggregation Levels and their associated interval buckets: • Fully Mechanized: ~~0 - <= 15 minutes~~ ~~> 15 - <= 30 minutes~~ ~~> 30 - <= 45 minutes~~ ~~> 45 - <= 60 minutes~~ ~~> 60 - <= 90 minutes~~ ~~> 90 - <= 120 minutes~~ ~~> 120 - <= 180 minutes~~ 0 - <= 3 hours ~~> 3 - <= 6 hours~~ ~~> 6 - <= 12 hours~~ ~~> 12 - <= 24 hours~~ ~~> 24 - <= 48 hours~~ ~~> 48 hours~~ • Partially Mechanized: ~~0 - <= 4 hours~~ ~~> 4 - <= 8 hours~~ ~~> 8 - <= 10 hours~~ 0 - <= 10 hours ~~> 10 - <= 18 hours~~ ~~0 - <= 18 hours~~ ~~> 18 - <= 24 hours~~ ~~> 24 - <= 48 hours~~ ~~> 48 hours~~	Clarification Single Interval buckets for Fully Mechanized, Partially Mechanized, Non-Mechanized and Local Interconnection Trunks based on the benchmark. This is the removal of unnecessary data as the number of interval buckets is excessive and not a measure of performance. There is no need to continue to break down data to this level of detail, especially when the CLECs can separate data into any interval buckets they choose via the raw data.

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Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
			• Non-mechanized: ~~0 - <= 4 hours~~ ~~> 4 - <= 8 hours~~ ~~> 8 - <= 12 hours~~ ~~> 12 - <= 16 hours~~ 0 - <= 24 hours ~~> 16 - <= 20 hours~~ ~~> 20 - <= 24 hours~~ ~~> 24 - <= 36 hours~~ ~~0 - <= 36 hours~~ ~~> 36 - <= 48 hours~~ ~~> 48 hours~~ • Local Interconnection Trunks: ~~0 - <= 48 hours~~ ~~> 48 hours~~ 0 - <= 10 days • ~~Average interval is reported in business hours~~ • CLEC Specific • CLEC Aggregate • Geographic Scope - State ~~- Region~~	Average Interval is no longer reported. Performance is evaluated by state so a regional report is unnecessary.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** — **SQM Analog/Benchmark** • ~~Resale – Residence~~ Fully Mechanized ..... ~~Fully Mechanized:~~ 95% <= 3 Hours • ~~Resale – Business~~ Partially Mechanized ..... ~~Partially Mechanized: 95~~ 90% <= 10 Hours • ~~Resale – Design (Special)~~ Non-Mechanized ..... ~~Non-Mechanized: 95~~ 90% <= 24 Hours • ~~Resale PBX~~ • ~~Resale Centrex~~ • ~~Resale ISDN~~ • ~~LNP (Standalone)~~ • ~~INP (Standalone)~~ • ~~2W Analog Loop Design~~ • ~~2W Analog Loop Non-Design~~ • ~~2W Analog Loop with INP Design~~ • ~~2W Analog Loop with INP Non-Design~~ • ~~2W Analog Loop with LNP Design~~ • ~~2W Analog Loop with LNP Non-Design~~ • ~~UNE Digital Loop < DS1~~ • ~~UNE Digital Loop >= DS1~~ • ~~UNE Loop + Port Combinations~~ • ~~UNE Combination Other~~ • ~~UNE ISDN Loop~~ • ~~UNE Other Design~~ • ~~UNE Other Non-Design~~ • ~~UNE Line Splitting~~ • ~~EELs~~ • ~~Switch Ports~~ • ~~UNE xDSL (ADSL, HDSL, UCL)~~ • ~~Line Sharing~~ • ~~Local Interoffice Transport~~ • Local Interconnection Trunks..... ~~Trunks:~~ 95% <= ~~48~~ 10 ~~Hours~~ Days	The changes to the Benchmarks were made for two reasons. First, BellSouth is attempting to create a Regional SQM Plan to assimilate different benchmarks across the various state SQMs and create a 'regional' benchmark since the ordering center is regional. For example, for Partial Mechanized LSRs, BellSouth currently has benchmarks of 85% in 10 hours, 95% in 12 hours, 90% in 7 hours and 95% in 10 hours across t he BellSouth region. In an effort to obtain a 'regional' benchmark, 90% in 10 hours was proposed. For Non-Mechanized LSRs, BellSouth currently has a range of 85% in 36 hours to 95% in 24 hours. BellSouth is proposing 90% in 24 hours. For Local Interconnection Trucks (LIT), the majority of the states have 95% in 10 days, and that is BellSouth's proposal here as well. Second, as the volume of fully mechanized LSRs increases, the volume for partially and non-mechanized LSRs will continue to decrease. Thus, the records in these two categories will be more complex in nature, which will take longer to process. BellSouth's analysis shows that for May 2004, of the over 250K LSRs received for Florida, 82% of the LSRs were fully mechanized, and that partially mechanized and non-mechanized accounted for the remaining 14% and 4% of the LSRs respectively. As this trend continues, the benchmarks should be modified to be consistent with the fact that the partially mechanized and non-mechanized LSRs will become increasingly more complicated. BellSouth proposes no change to the benchmark; however, this measure is not particularly sensitive to product type so product disaggregation actually reveals little, if any information, about performance quality. Additionally, BellSouth proposes to eliminate reporting of multiple products under mechanization level because many of the products have little or no monthly volume. The benchmarks for this measure are set based on the level of mechanization, not by individual products. Raw data will provide drill down to the product level.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SEEM Measure	**SEEM** **Tier I** **Tier II** ~~Yes~~ No ..... ~~X~~ .....~~X~~	See SEEM Matrix for rationale
	~~O-10~~		Delete Service Inquiry with LSR firm Order Confirmation (FOC) Response Time Manual	This measure adds the service inquiry interval to the FOC interval for an extremely small number of orders - approximately 300 in the region in a 5 month period, and the FOC interval is also captured again in the FOC Timeliness (FOCT) measure.
	FOCRC: Firm Order Confirmation and Reject Response Completeness	Title	~~O-11~~ FOCRC: Firm Order Confirmation and Reject Response Completeness	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
		Definition	~~A response is expected from BellSouth for every~~ 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. ~~transaction (version). Firm Order Confirmation and Reject Response Completeness is the corresponding number of Local Service Requests received to the combination of Firm Order Confirmation and Reject Responses.~~	Wording clarification
		Exclusions	• Service requests canceled by the CLEC prior to FOC or Reject~~ed/clarified~~ being sent • Fatal Rejects • LSRs which are identified as "Projects" with the exception of valid "Projects IDs" for UNE-P to UNE Loop Bulk Migrations • Test Transactions/Records	Clarification Bulk Migrations are unique in that they have standard intervals even though they are projects and are distinguishable from other projects. Consequently, these projects orders are included in the results. Performance on test transactions does not affect CLECs.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	**Fully Mechanized:** The number of FOCs or ~~Auto Clarifications~~ Rejects sent to the CLEC from ~~EDI, or TAG~~ ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways). **Partially Mechanized:** The number of FOCs or Rejects sent to the CLEC from ~~EDI, or TAG~~ 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. **Non-Mechanized:** The number of FOCs or Rejects sent to the CLECs ~~by~~ via FAX server in response to manually submitted LSRs/ASRs (date and time stamp in FAX Server). **Local Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the ~~Local Interconnection Service Center (LISC)~~ Carrier Interconnection Switching Center (CISC). ~~Trunk data is reported as a separate category.~~ **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. ~~For CLEC Results:~~ ~~Percent responses is determined by computing the number of Firm Order Confirmations and Rejects transmitted by BellSouth and dividing by the number of Local Service Requests (all versions) received in the reporting period.~~	Wording changes to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems. Clarification Updated name of center processing ASRs for Local Interconnection Trunks. Removed redundant language since ASR is included in measure definition. Provides Business Rules and definitions for the components of the new Bulk Migration process.

		Report Structure	• One report with the following four Disaggregation Levels:
			  - Fully Mechanized~~,~~
			  - Partially Mechanized~~,~~
			  - Non-Mechanized ~~and~~
			  - Local Interconnection Trunks
			• CLEC Specific
			• CLEC Aggregate
			• Geographic Scope
			  - State ~~and Region~~
				Clarification
				
				Results are monitored by state, so a regional report is unnecessary.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** ..... **SQM Analog/Benchmark** • ~~Resale Residence~~ Fully Mechanized ..... 95% Returned • ~~Resale Business~~ Partially Mechanized ..... 95% Returned • ~~Resale Design (Special)~~ Non-Mechanized ..... 95% Returned • ~~Resale PBX~~ • ~~Resale Centrex~~ • ~~Resale ISDN~~ • ~~LNP (Standalone)~~ • ~~INP (Standalone)~~ • ~~2W Analog Loop Design~~ • ~~2W Analog Loop Non-Design~~ • ~~2W Analog Loop with INP Design~~ • ~~2W Analog Loop with INP Non-Design~~ • ~~2W Analog Loop with LNP Design~~ • ~~2W Analog Loop with LNP Non-Design~~ • ~~UNE Digital Loop < DS1~~ • ~~UNE Digital Loop >= DS1~~ • ~~UNE Loop + Port Combinations~~ • ~~UNE Combination Other~~ • ~~UNE ISDN Loop~~ • ~~UNE Other Design~~ • ~~UNE Other Non-Design~~ • ~~UNE Line Splitting~~ • ~~EELs~~ • ~~Switch Ports~~ • ~~UNE xDSL (ADSL, HDSL, UCL)~~ • ~~Line Sharing~~ • ~~Local Interoffice Transport~~ • Local Interconnection Trunks ..... 95% Returned	BellSouth proposes no change to the Benchmark; however, this measure is not particularly sensitive to product type so product disaggregation actually reveals little, if any information, about performance quality. Additionally, BellSouth proposes to eliminate reporting of multiple products under mechanization level because many of the products have little or no monthly volume. The benchmarks for this measure are set based on the level of mechanization, not by individual products. Raw data will provide drill down to the product level.
		SEEM Measure	**SEEM** **Tier I** **Tier II** Yes ..... ~~X~~ X	See SEEM Matrix for rationale
	~~O-12~~		Delete Speed of Answer in Ordering Center	Timeliness of answer in the LCSC is not directly affecting CLECs ability to provide service. Orders are not placed by telephone; instead the CLEC Service Rep is calling to get information. Frequently this information is already available to the CLECs or is not necessary for order processing.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	SOAC: Service Order Accuracy	Title	~~P-11A~~ SOAC : Service Order Accuracy	Note: This measure has been moved from Provisioning to Ordering. SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
		Definition	~~The Service Order Accuracy measurement~~ 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 a BellSouth service representative in the LCSC are measured.	Wording clarification
		Exclusions	• Canceled Service Orders • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, ~~Listing Orders,~~ Test O~~o~~rders ~~using test OCns~~, etc., which may be ~~coded~~ order types C, N, R or T ~~etc.~~) • Disconnect Orders • ~~CLEC LSRs Submitted Manually (FAX or Courier)~~ • CLEC LSRs submitted electronically that are not manually handled by BellSouth (Flow-Through) • LSRs which are identified as "Projects" • Listing Orders	Definition indicates that we only look at Partially Mechanized requests Projects are non-standard and may not have a LSR to compare to the service order. Listing orders were already excluded from the measure. BellSouth lists it separately for consistency in the Provisioning measures.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	~~Only CLEC LSRs submitted electronically that fall out of the electronic system for manual processing (partially mechanized) by a BellSouth representative and the resulting service orders are selected for this measure.~~ The CLEC requested services on the LSR are mechanically compared to the completed service order using the CLEC affecting service attributes shown below. **Selected CLEC Affecting Service Attributes** The BellSouth Local Service Request (LSR) fields identified below will be used, as applicable, for this Service Order Accuracy review process. ~~**BellSouth LSR Fields**~~ A service affecting comparison of the fields listed below will determine the accuracy of the provisioning process. ~~The fields listed below would only be captured as a miss when they are service affecting. For the purpose of the Service Order Accuracy measure, i~~If any of the fields listed below are populated on the LSR and do not match the corresponding field on the Service Order, and are service affecting, the order will be scored as a miss. ~~, but this mismatch does not affect the correct provisioning of the Service Order, the field is not considered to be service affecting and therefore will not be included as a miss in this measure.~~	Removal of redundant language already covered in the Definition. Clarification

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
			~~An example would be~~ BellSouth will maintain a list of LCSC/System workarounds which will not be service affecting. This list ~~which~~ will be identified in a document posted on the Interconnection website. CLECs may discuss any of the posted LCSC/System workarounds during the regular PMAP notification calls. • Company Code • PON • Billed Telephone Number • Telephone Number • Ported Telephone Number • Circuit ID • PIC • LPIC • Directory Listing - 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	Clarification, only the noted workarounds will be posted

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
			• Features - Feature Activity - Feature Codes - Feature Detail* • Hunting - Hunt Group Activity - Hunt Group Identifier - Telephone Number Identifier - Hunt Type Code - Hunt Line Activity - Hunting Sequence - Number Type - Hunting Telephone Number • E911 Listing - 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 Interconnection Website. Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this Website.	
		Calculation	**Percent Service Order Accuracy** = (a / b) X 100 • a = ~~Applicable~~ Orders completed without error • b = ~~Applicable~~ Orders completed in reporting period	Removal of unnecessary wording

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
Provisioning	~~P-1~~		Delete Mean Held Order Interval & Distribution Intervals	As part of the streamlined SQM, BellSouth proposes to delete several duplicative measures. This measure should be deleted since these orders are already included in the proposed Firm Order Confirmation Average Completion Interval (FOCI) and the proposed Percent Installation Appointments Met (PIAM) measures. To be considered as a held order, the due date must already be missed, so not only are these missed orders counted in this measure, they are counted in the proposed PIAM, and the interval calculated in this measure is included in the proposed FOCI. Secondly, experience has shown that transaction volumes are usually too small in the measure to be useful to evaluate performance.
	~~P-2A~~		Delete Jeopardy Notice Interval	As part of the streamlined SQM, BellSouth proposes to delete several measures of processes that have minimal impact on CLECs. A jeopardy notice is an advance warning that BellSouth might miss the due date, so it provides no definitive information to CLECs. Performance for Jeopardy notice interval is not a problem. For example, for UNE-P, BellSouth averages 130hrs, obviously exceeding the 48hr. target. Additionally, the interval calculated in this measure is included in the proposed FOCI. Jeopardy Notice Interval is not a parity measure since BellSouth does not give an electronic jeopardy notice to its retail customers.
	~~P-2B~~		Delete Percentage of Orders Given Jeopardy Notices	As part of the streamlined SQM, BellSouth proposes to delete several measures of processes that have minimal impact on CLECs. A jeopardy notice is an advance warning that BellSouth might miss the due date, so it provides no definitive information to CLECs.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	PIAM: Percent Installation Appointments Met	Title	~~P-3~~ PIAM: Percent ~~Missed Initial~~ Installation Appointments Met	BellSouth is attempting to create a Regional SQM Plan to assimilate different measurements across the various state SQMs and meet various FCC reporting requirements. Changing this measurement to report the percentage of appointments met not only provides a measure consistent with the existing 272 measure for PIAM but it also displays the information in a format that accentuates what BellSouth did correctly instead of what went wrong.
		Definition	~~"Percent missed initial installation appointments" monitors the reliability of BellSouth commitments with respect to committed due dates to assure that the CLEC can reliably quote expected due dates to their retail customer as compared to BellSouth.~~ This report measures ~~is~~ the percentage of total orders ~~processed~~ for which BellSouth ~~is unable to complete the service orders on~~ meets the committed due date~~s and reported for Total misses and End User Misses~~.	BellSouth is attempting to create a Regional SQM Plan to assimilate different measurements across the various state SQMs and meet various FCC reporting requirements. Changing this measurement to report the percentage of appointments met not only provides a measure consistent with the existing 272 measure for PIAM but it also displays the information in a format that accentuates what BellSouth did correctly instead of what went wrong.
		Exclusions	~~• Orders c~~Canceled Service Orders ~~prior to the due date including orders that are to be provisioned on the same day they are placed. ("Zero Due Date Orders")~~ • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, ~~Listing Orders~~ Test Orders, etc., which may be o~~O~~rder types ~~may be coded~~ C, N, R or T) • Disconnect ~~(D) & From (F) o~~Orders ~~• End User Misses~~ • Listing Orders	The change for Canceled Orders is a simplification of the exclusion to ensure consistency across all the Provisioning measures. As a correction, End User Missed Appointments are not excluded from the measure; they are reported separately in this report. Listing orders were already excluded in the measurement. BellSouth lists it separately again for consistency in the Provisioning measures.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	~~Percent Missed Initial Installation Appointments (PMI) is the percentage of orders with completion dates in the reporting period that are past the original committed due date. Missed Appointments caused by end-user reasons will be excluded and reported separately. The first commitment date on the service order that is a missed appointment is the missed appointment code, used for calculation whether it is a BellSouth missed appointment or an End User missed appointment. The "due date" is any time on the confirmed due date.~~ ~~Which means there cannot be a cutoff time for commitments, as certain types of orders are requested to be worked after standard business hours. Also, during Daylight Savings Time, field technicians are scheduled until 9PM in some areas and the customer is offered a greater range of intervals from which to select.~~ All Service orders are considered as met, unless the first missed appointment code is due to BellSouth company reasons.	Clarification of the Business Rules to change from a percent missed to a percent met measure. This is the same rule that applies to existing 272 measures.
		Calculation	**Percent ~~Missed~~ Installation Appointments Met** = (a / b) X 100 • a = Number of orders ~~with Completion date in reporting period past the original committed due date~~ where the installation appointment is met • b = Total number of orders completed during the ~~in~~ reporting period	Clarification of the Business Rules to change from a percent missed to a percent met measure. This is the same rule that applies to existing 272 measures.
		Report Structure	• CLEC Specific • CLEC Aggregate • BellSouth Aggregate • ~~Report in Categories of <10 lines/circuits >= 10 lines/circuits (except trunks)~~ • ~~Dispatch/Non-Dispatch (except Trunks)~~ • Geographic Scope - State ~~- Region~~	Report Structure changed to eliminate categories with little or no volume, resulting in data that should be more concise and meaningful. For example, >=10 lines/circuits virtually never has any data in the reports. Dispatch/Non-Dispatch disaggregation is eliminated because it is not meaningful to distinguish between appointments that are dispatched or not, the important point is whether or not BellSouth met the appointment.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** — **SQM Analog/Benchmark** • Resale Residence (Non-Design) — Retail Residence (Non-Design) • Resale Business (Non-Design) — Retail Business (Non-Design) • Resale Design — Retail Design • ~~Resale PBX — Retail PBX~~ • ~~Resale Centrex — Retail Centrex~~ • ~~Resale ISDN — Retail ISDN~~ • LNP /INP (Standalone) — Retail Residence and Business (POTS) • ~~INP (Standalone) — Retail Residence and Business (POTS)~~ • ~~2W~~ UNE Analog Loop (Design) — Retail Residence and Business (Design/Dispatch) • ~~2W~~ UNE Analog Loop (Non-Design) — Retail Residence and Business – (POTS (Excluding Switch Based Orders) • ~~2W Analog Loop With LNP – Design — Retail Residence and Business Dispatch~~ • ~~2W Analog Loop With LNP – Non-Design — Retail Residence and Business – (POTS Excluding Switch Based Orders)~~ • ~~2W Analog Loop With INP-Design — Retail Residence and Business Dispatch~~ • ~~2W Analog Loop With INP-Non-Design — Retail Residence and Business – (POTS Excluding Switch Based Orders)~~ • UNE Digital Loop < DS1 — Retail Digital Loop < DS1 • UNE Digital Loop >= DS1 — Retail Digital Loop >= DS1 • UNE Loop + Port Combinations — Retail Residence and Business – ~~Dispatch In — Dispatch In~~ – ~~Switch Based — Switched Based~~ • ~~UNE Switch Ports — Retail Residence and Business (POTS)~~ • ~~UNE Combo Other — Retail Residence, Business and Design Dispatch~~ • UNE EELs — Retail DS1/DS3 • UNE xDSL (HDSL, ADSL and UCL) — ADSL Provided to Retail – ~~Without Conditioning — Without Conditioning~~ – ~~With Conditioning — With Conditioning (BellSouth does not offer this service to Retail)~~ • UNE ISDN — Retail ISDN - BRI • UNE Line ~~Sharing~~ Splitting ~~Without Conditioning~~ — ADSL Provided to Retail ~~With Conditioning — ADSL Provided to Retail~~ • UNE Other Design — Diagnostic ~~Retail Design~~ • UNE Other Non-Design — Diagnostic ~~Retail Residence and Business~~ • ~~Local Transport (Unbundled Interoffice Transport) — Retail DS1/DS3 Interoffice~~ • Local Interconnection Trunks — ~~Parity with~~ Retail Trunks • ~~UNE Line Splitting Without Conditioning — ADSL Provided to Retail~~ • ~~With Conditioning — ADSL Provided to Retail~~ • ~~UNE UDC/IDSL — Retail ISDN – BRI~~	Streamline the SQM plan by eliminating product disaggregations with consistently low volume. These low volumes render the measure virtually useless to evaluate performance. The products in the disaggregations that were removed will continue to be included in the results. They will simply be part of another category instead of reported separately. Since the volumes are low, performance monitoring for either category would not be adversely affected.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	FOCI: Firm Order Confirmation Average Completion Interval	Title	FOCI: Firm Order Confirmation Average Completion Interval	New measure added that combines intervals to return a FOC and to complete a service order into a single interval measure. This measure has been requested by CLECs.
		Definition	The "Firm Order Confirmation Average Completion Interval" measures the interval of time it takes BellSouth to provide service for the CLEC or its own customers. This report measures how well BellSouth meets the interval offered to customers on service orders from receipt of a Local Service Request (LSR) to the order completion. It is a combined report of FOC and OCI.	New measure added that combines intervals to return a FOC and to complete a service order into a single interval measure. This measure has been requested by CLECs.
		Exclusions	• 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 coded C, N, R, or T) • Disconnect Orders • "L" Appointment coded orders (where the customer has requested a later than offered interval) • End-User Caused Missed Appointments • Rejected LSRs • LSRs identified as "Projects" • Scheduled OSS Maintenance • Listing Orders	These are the combined exclusions from the previous FOC Timeliness and Average Completion Interval measures, which are combined in this measure. For the most part, these exclusions are designed to remove activities that would create an adverse result, but are not in the control of BellSouth. Define project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations, although considered a project, will not be excluded from the measurement. Bulk Migrations are unique in that they have standard intervals even though they are projects and are distinguishable from other projects. Consequently, these projects orders are included in the results. Disconnect and Listing orders have historically been excluded because CLECs allege that they tend to bias the results in favor of BellSouth. These exclusions are consistent with those for other ordering and provisioning measures.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	For CLEC orders, the actual FOC interval and completion interval is determined for each order processed during the reporting period. The duration starts when BellSouth receives a valid LSR or ASR and stops when the technician or system completes the order in SOCS. For BellSouth retail orders, an interval representing FOC time is added to the actual completion interval to create an analogous retail analog since BellSouth retail orders do not have a comparable ordering process. The start time for the completion interval for BellSouth retail orders is the timestamp of the first entry into SOCS and the stop time is when the technician or system completes the order in SOCS. Orders worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work/non-dispatched) or field orders (dispatched). Only valid business hours/days will be included in the calculation of this interval for FOC interval and valid business days for OCI interval. Valid business days and hours can be found on the Interconnection website (http://www.interconnection.bellsouth.com/# local ordering handbook/interval guide). **LSR/ASR Business Hours:** 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). **Mechanized Rules For LSR Receipt:** **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) that does not fall out for manual handling until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways. **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 service representative, via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS), to SOCS and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways. **Non-Mechanized:** The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time LSRs received in the center) until appropriate service orders are issued by a BellSouth 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. **Local Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the center. Trunk data is reported separately. When multiple FOCs occur on a single request, the first FOC is used to measure the interval.	Combines the Business Rules of FOC Timeliness and former OCI measures.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Calculation	**Firm Order Confirmation Completion Interval** = (a - b) • a = Service order completion date and time • b = Service request receipt date and time **Firm Order Confirmation Average Completion Interval** = (c / d) • c = Sum of all completion intervals • d = Count of orders completed in reporting period	New calculation required for new measure.
		Report Structure	• CLEC Specific • CLEC Aggregate • BellSouth Aggregate • Reported in categories of < 6 lines/circuits, >= 6 lines/circuits (except trunks) • Dispatch/Non-Dispatch categories applicable to all levels except trunks • Fully Mechanized; Partially Mechanized; Non-Mechanized; Local Interconnection Trunks • Geographic Scope - State	Consistent with Report Structure for FOC Timeliness and former OCI measures.

Proposed Tennessee SQM Modifications

<table>
<tr><th>Domain</th><th>Measure No.</th><th>Section</th><th>Proposed Change</th><th>Rationale for Proposed Change</th></tr>
<tr><td></td><td></td><td>SQM Disaggregation – Analog / Benchmark</td><td>
Performance Standard (FOC+OCI)
Business Days (FOC)
(Days Added to Interval)
<table>
<tr><th>Disaggregation</th><th>Analog/Benchmark (OCI)</th><th>FM</th><th>PM</th><th>NM</th></tr>
<tr><td>Resale Residence (Non-Design)</td><td>Retail Residence (Non-Design)</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>Resale Business (Non-Design)</td><td>Retail Business (Non-Design)</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>Resale Design</td><td>Retail Design</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>LNP \INP (Standalone)</td><td>Retail Residence and Business (POTS)</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Analog Loop Design</td><td>Retail Residence,Business and Design (Dispatch)</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Analog Loop Non-Design</td><td>Retail Residence and Business (Dispatch)</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Digital Loop < DS1</td><td>Retail Digital Loop < DS1</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Digital Loop >= DS1</td><td>Retail Digital Loop >= DS1</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Loop + Port Combinations</td><td>Retail Residence and Business</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE EELs</td><td>Retail DS1/DS3</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE xDSL (HDSL, ADSL and UCL) without conditioning</td><td>6 Days</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE xDSL (HDSL, ADSL and UCL) with conditioning</td><td>12 Days</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Line Splitting without conditioning</td><td>ADSL Provided to Retail</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Line Splitting with conditioning</td><td>12 Days</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE ISDN</td><td>Retail ISDN – BRI</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Other Design</td><td>Diagnostic</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>UNE Other Non-Design</td><td>Diagnostic</td><td>.5</td><td>1.0</td><td>2.5</td></tr>
<tr><td>Local Interconnect ion Trunks</td><td>Retail Trunks</td><td></td><td></td><td>10</td></tr>
</table>
</td><td>Combines performance standards for FOC Timeliness and former OCI measures

Streamline the SQM plan by eliminating product disaggregations with consistently low volume. These low volumes render the measure virtually useless to evaluate performance. The products in the disaggregations that were removed will continue to be included in the results. They will simply be part of another category instead of reported separately. Since the volumes are low, performance monitoring for either category would not be adversely affected.</td></tr>
<tr><td></td><td></td><td>SEEM Measure</td><td>SEEM Tier I Tier II
Yes ..... X .....X</td><td>This is the measure of Ordering Timeliness and a high profile measure of provisioning timeliness although PMIA is the principal measure of provisioning timeliness.</td></tr>
<tr><td></td><td>~~P-4~~</td><td></td><td>Delete Average Completion Interval (OCI) & Order Completion Interval Distribution</td><td>This information is now included in the FOCI measure.</td></tr>
</table>

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	~~P-5~~		Delete Average Completion Notice Interval	The completion notice is only one means for CLECs to determine whether an order has been completed. CLECs have other tools to check on order status such as CSOTS. Average Completion Notice Interval exists today as a parity measure but this is actually better service than is provided to retail because BellSouth retail operations do not get a notification that the service order work is complete. Retail has to check completions in SOCS. Further, this function has only a minimal impact on the CLEC, because the work has been completed and at worse can result in temporary billing conflicts if the customer's billing date falls in the period between work completion and completion notice delivery, and the CLEC does not check the order status in CSOTS. Any such conflicts that occur would be fixed in the next billing cycle.
	~~P-6~~		Delete % Completions/Attempts without Notice or < 24 Hours Notice	This is simply another measure of FOC Timeliness which is already measured twice, in both FOCT and FOCI. If FOCs are returned in a timely manner, the CLEC will have adequate notice of completions before the due date. FOC timeliness provides specific intervals for delivery of a response with a due date; the FOC should be sent out within X hours of receipt and this would allow the customer enough time to be notified of committed due date without regards to whether we sent it within 24 hours of dispatch.
	CCCI: Coordinated Customer Conversions Interval – Hot Cut Duration	Title	~~P-7~~ CCCI: Coordinated Customer Conversions Interval – Hot Cut Duration	Measure changed to include time to notify CLEC after the hot cut has been completed.
		Definition	This report measures the average time it takes BellSouth to disconnect ~~an unbundled~~ loop~~s~~ from the BellSouth switch, ~~and cross~~ connect ~~it~~ the loops to the CLEC, and notify the CLEC after the conversion is complete ~~equipment~~. This measurement applies to service orders ~~with INP and with LNP, and~~ where the CLEC has requested BellSouth to provide a coordinated ~~cut over~~ conversion.	Wording clarification and measure changed to include time to notify CLEC after hot cut is complete.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Exclusions	• ~~Any order canceled by the CLEC will be excluded from this measurement~~ Canceled Service Orders • Delays caused by the ~~due to~~ CLEC ~~following Disconnection of the Unbundled Loop~~ • ~~Unbundled Loops where there is no existing subscriber loop and loops where coordination is not requested~~ • Non-Coordinated Conversions • 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	Brevity Any CLEC caused delay should be excluded. Brevity These type orders do not affect timeliness of the coordinated hot cut provided to CLEC.
		Business Rules	~~When the service order includes LNP, the interval includes the total time for the cut over including the translation time to place the line back in service on the ported line. When the service order includes INP, the interval includes the total time for the cutover including the translation time to place the link back in service on the ported line. The interval is calculated for the entire cutover time for the service order and then divided by items worked in that time to give the average per item interval for each service order.~~ Coordinated conversions are scheduled between the CLEC and BellSouth. The start time for this measure will be the mutually agreed upon start of the conversion and the stop time will be when the CLEC is notified after the conversion is complete. The conversion interval for the entire service order is calculated and then divided by the number of loops converted to determine the average duration per loop.	Revised Business Rules to be consistent with definition and calculation of the measure.
		Calculation	**Coordinated Customer Conversions Interval** = (a - b) / c • a = Completion date and time ~~for Cross Connection of a Coordinated Unbundled Loop~~ of CLEC notification • b = ~~Disconnection~~ Start date and time of ~~an Coordinated Unbundled Loop~~ conversion • c = Number of loops per order **Percent Coordinated Customer Conversions** ~~(for each interval)~~ = ~~(c / d)~~ (d / e) X 100 • ~~c~~ d = Total number of Coordinated Customer Conversions ~~for each interval~~ (loops) within <= 20 minutes • ~~d~~ e = Total number of ~~Unbundled Loop with~~ Coordinated Customer Conversions (~~items~~ loops) for the reporting period	Revised to include CLEC notification time Revised to include CLEC notification time
		Report Structure	• CLEC Specific • CLEC Aggregate • ~~The interval breakout is 0-5 = 0 <=5, 5-15 = >5 <=15, >=15 = 15 and greater, plus Overall Average Interval~~ • Geographic Scope - State ~~- Region~~	Remove unnecessary data, the number of interval buckets is excessive and not a measure of performance. CLECs can arrange their data into any buckets they choose using supporting data, so there is no need to report all of this information routinely. Performance is monitored by state so regional repo is unnecessary

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** **SQM Analog/Benchmark** • ~~Unbundled Loops with INP~~ Coordinated Customer Conversions (Loops) 95% <= ~~15~~ 20 Minutes • ~~Unbundled Loops with LNP ..... 95% <= 15 minutes~~	Very low volume in INP To account for adding notification time to the interval.
	HCT: Coordinated Customer Conversions – Hot Cut Timeliness	Title	~~P-7A~~ HCT: Coordinated Customer Conversions – Hot Cut Timeliness ~~% within Interval and Average Interval~~	Average Interval is not used to evaluate performance so no longer provided.
		Definition	This report ~~category~~ measures the percentage of orders where ~~whether~~ BellSouth begins the ~~cutover~~ conversion of a~~n unbundled~~ loop on a coordinated and/or a time specific order ~~at~~ within a timely manner of the CLEC requested start time. ~~It measures the percentage of orders where the cut begins within 15 minutes of the requested start time of the order and the average interval.~~	Two time frames are needed 15 min for non IDLC and usually 2 hours for IDLC. Instead of describing these details here, they are in the business rules.
		Exclusions	• Any order canceled by the CLEC ~~will be excluded from this measurement.~~ • Delays caused by the CLEC • ~~Unbundled~~ Loops where there is no existing subscriber loop and loops where coordination is not requested • Subsequent ~~All unbundled~~ loops on multiple loop orders after the first loop • ~~Test 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) • Listing Orders	Brevity Wording clarification These type orders do not affect timeliness of the coordinated hot cut provided to CLEC.
		Business Rules	~~This report measures whether BellSouth begins the cutover of an unbundled loop on a coordinated and/or a time specific order at the CLEC requested start time.~~ The cut is considered "on time" if it starts <= 15 minutes before or after the requested start time. ~~Using the scheduled time and the actual cut over start time, the measurement will calculate the percent within interval and the average interval.~~ If a cut involves multiple lines, the cut will be considered "on time" if the first line is cut within the "on time" interval. ~~<= 15 minutes includes intervals that began 15:00 minutes or less before the scheduled cut time and cuts that began 15 minutes or less after the scheduled cut time; >15 minutes, <= 30 minutes includes cuts within 15:00 – 30:00 minutes either prior to or after the scheduled cut time; >30 minutes includes cuts greater than 30:00 minutes either prior to or after the scheduled cut time.~~ If Integrated Digital Loop Carrier (IDLC) is involved, ~~a four hour window applies to the start time. (8 A.M. to Noon or 1 P.M. to 5 P.M.) This only applies if~~ BellSouth must notif~~ies~~y the CLEC by 10:30 AM on the day before the due date ~~that the service is on IDLC~~ and then the "on time" interval is <= 2 hours before or after the requested start time.	Clarify business rules and define which interval applies for IDLC and non-IDLC loops.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Calculation	~~%~~ **Percent within Interval** = (a / b) X 100 • a = Total number of coordinated unbundled loop orders ~~for the interval~~ converted "on time" • b = Total number of coordinated unbundled loop orders for the reporting period ~~**Interval** = (c – d)~~ ~~• c = Scheduled Time for Cross Connection of a Coordinated Unbundled Loop Order~~ ~~• d = Actual Start Date and Time of a Coordinated Unbundled Loop Order~~ ~~**Average Interval** = (e / f)~~ ~~• Sum of all Intervals~~ ~~• Total Number of Coordinated Unbundled Loop Orders for the reporting period~~	Timeliness is evaluated by percent within interval calculation. Interval and Average Interval is not used to evaluate performance so it is no longer provided.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	• CLEC Specific • CLEC Aggregate • ~~Reported in intervals of early, on time and late cuts % <= 15 minutes; % >15 minutes, <= 30 minutes; % >30 minutes, plus Overall Average Interval~~ • Geographic Scope - State ~~- Region~~ • ~~Percentages are reported in intervals of early, on time and late cuts for IDLC and non-IDLC cuts~~ ~~On Time (Non-IDLC)~~ ~~<= 15 minutes~~ ~~Note: This is a 30-minute bucket representing a cut that begins 15 minutes or less before or after the scheduled start time.~~ ~~Early (Non-IDLC)~~ ~~>15 minutes - <= 30 minutes~~ ~~>30 minutes - <= 60 minutes~~ ~~>60 minutes - <= 120 minutes~~ ~~>120 minutes - <= 180 minutes~~ ~~>180 minutes - <= 240 minutes~~ ~~<= 240 minutes~~ ~~Late (Non-IDLC)~~ ~~>15 minutes - <= 30 minutes~~ ~~>30 minutes - <= 60 minutes~~ ~~>60 minutes - <= 120 minutes~~ ~~>120 minutes - <= 180 minutes~~ ~~>180 minutes - <= 240 minutes~~ ~~>240 minutes~~ ~~Overall Average Interval for non-IDLC~~	Reporting results in these three separate distributions is unnecessary, only one of them is used to evaluate performance Performance is monitored by state, so regional report is unnecessary Remove unnecessary data, the number of interval buckets is excessive and not a measure of performance. CLECs can arrange their data into any buckets they choose using raw data, so there is not need to report all of this information routinely.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
			~~On Time (IDLC)~~ ~~<= 2 hours~~ ~~Note: This is a 4-hour bucket representing a cut involving IDLC that begins 2 hours or less before or after the scheduled start time~~ ~~Early (IDLC)~~ ~~>2 hours~~ ~~Late (IDLC)~~ ~~>2 hours~~ ~~Overall Average Interval for IDLC~~	Reporting results in these three separate distributions is unnecessary, only one of them is used to evaluate performance
		SQM Disaggregation – Analog / Benchmark	• Product Reporting Level - ~~SL1 Time Specific~~ Non-IDLC..... 95% within + or – 15 minutes of scheduled start time ~~SL1 Non-Time Specific~~ - ~~SL2 Time Specific~~ ~~SL2 Non-Time Specific~~ - ~~SL1~~ IDLC ..... ~~95% within 4 Hour Window~~ 95% within + or – 2 hours of scheduled start time ~~SL2 IDLC~~	The former disaggregations were not meaningful; the only relevant ones are the proposed disaggregations.
	RT: Coordinated Customer Conversion – Average Recovery Time	Title	~~P-7B~~ RT: Coordinated Customer Conversion – Average Recovery Time	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
		Definition	~~Measures the time between notification and resolution by BellSouth of a service outage found that can be isolated to the BellSouth side of the network. The time between notification and resolution by BellSouth must be measured to ensure that CLEC customers do not experience unjustifiable lengthy service outages during a Coordinated Customer Conversion.~~ 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.	Simply define measure here; the removed language is addressed in the business rules.
		Exclusions	• ~~Cutovers~~ Conversions where service outages are due to CLEC caused reasons ~~when the CLEC agrees~~ • ~~Cutovers~~ Conversions where service outages are due to end-user caused reasons ~~when the CLEC agrees~~ • ~~Test 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) • Listing Orders	Only account for those outages caused by BellSouth. These orders do not affect performance on coordinated hot cuts for CLECs.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	Measures the outage duration time related to Coordinated Customer Conversions from the initial trouble notification until the service ~~trouble~~ has been restored and the CLEC has been notified. ~~The duration time is defined as the time from the initial trouble notification until the trouble 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.	Wording clarification and duration definition moved to calculation section. Overall percentage is necessary to assess the value of the results for this measure.
		Calculation	**Recovery Time** = (a - b) • a = Date and time ~~that~~ the initial trouble is cleared and the ~~Closed by~~ CLEC is notified • b = Date and time the initial trouble is opened with BellSouth **Average Recovery Time** = (c / d) • c = Sum of all the Recovery Times ~~per circuit~~ • d = Number of troubles ~~per circuit~~ referred to BellSouth **Percentage of Items with No Troubles** = (e /f) X 100 • e = Total items in the reporting period that did not have a trouble during a coordinated conversion • f = Total items for the reporting period	Clarification Add calculation for overall percentage, which is necessary to assess the value of these measurement results.
		Report Structure	• CLEC Specific • CLEC Aggregate • Geographic Scope - State ~~- Region~~	Performance is monitored by state so regional repor is unnecessary.
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** **SQM Analog/Benchmark** • ~~Unbundled Loops with INP~~ Coordinated Customer Conversions (Loops) ~~<= 5 Hours~~ Diagnostic • ~~Unbundled Loops with LNP ..... <= 5 Hours~~	INP has very low volume History has shown that long intervals on this measure do not necessarily indicate a performance problem because the number of such troubles is so small. In the rare cases when a trouble occurs, it is a very unusual case they may be very complicated to solve so a meaningful benchmark interval can't be established.
	PT: Hot Cut Conversions - Percent ~~Provisioning~~	Title	~~P-7C~~ PT: Hot Cut Conversions - ~~%~~ Percent Provisioning Troubles Received within ~~7~~ 5 Days of a Completed Service Order	Any trouble connected to initial conversion should be captured looking forward 5 days particularly on hot cuts where conversion troubles are noticed almost immediately.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	Provisioning Troubles Received within 5 Days of a Completed Service Order	Definition	This report measures the percentage of provisioning troubles received within ~~7~~ 5 days of a completed service order associated with a Coordinated and Non-Coordinated Customer ~~Hot Cut~~ Conversion ~~(CCC) measures~~ and ensures the quality and accuracy of ~~Coordinated Customer~~ Hot Cut Conversion activities.	Wording change to match title change from 7 Days to 5 Days. Any trouble connected to initial conversion should be captured looking forward 5 days particularly on hot cuts where conversion troubles are noticed almost immediately.
		Exclusions	• ~~Any order canceled by the~~ 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 T) • Troubles outside of BellSouth's control • Disconnect Orders	BellSouth should not have troubles outside their control counted against the measure. Listing and administrative orders do not affect performance for a CLEC.
		Business Rules	~~Measures the quality and accuracy of completed service orders associated with Coordinated and Non-coordinated Customer Conversions.~~ The first trouble report received on a circuit ID within ~~7~~ 5 days following a service order completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate. ~~Reports are calculated searching in the prior report period for completed Coordinated Customer Conversion service orders and following 7 days after the completion of the service order for a trouble report issue date.~~	Wording change to match title from 7 Days to 5 Days. Calculation language is covered in the calculation section.
		Calculation	~~%~~ **Percentage of Provisioning Troubles within ~~7~~ 5 Days of Service Order Completion** = (a / b) X 100 • a = The sum of all ~~CCC~~ Hot Cut Circuits with a trouble within ~~7~~ 5 days following service order(s) completion • b = The total number of ~~CCC~~ Hot Cut ~~Service Order~~ Circuits completed in the previous report ing period ~~calendar month~~	Wording change to match title from 7 Days to 5 Days.
		Report Structure	• CLEC Specific • CLEC Aggregate • ~~Dispatch/Non-Dispatch~~ • Geographic Scope - State - ~~Region~~	Performance is monitored by state so regional repor is unnecessary.
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** — **SQM Analog/Benchmark** • UNE Loops ~~Design~~ ..... <= ~~3~~ 5% • ~~UNE Loop Non-Design ..... <= 3%~~	Design characteristic should have little, if any, affect on hot cut performance. Most of these loops are non-design so there is no need to maintain separate reporting.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		SEEM Measure	**SEEM** **Tier I** **Tier II** ~~Yes~~ No ..... ~~X~~ .....~~X~~	See SEEM matrix for rationale.
	CNDD: Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date	Title	CNDD: Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date	This is a new measure that was filed in the TRO proceeding to address a process that may have considerably increased volume.
		Definition	This report measures the percentage of non-coordinated conversions that BellSouth completed and provided notification to the CLEC on the due date during the reporting period.	This is a new measure that was filed in the TRO proceeding to address a process that may have considerably increased volume.
		Exclusions	• CLEC Canceled Service Orders • Delays Caused by the CLEC • 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)	Situations outside of BellSouth's control
		Business Rules	This report measures whether BellSouth completes a non-coordinated conversion on the due date. The order is considered successfully completed if the order is completed on the due date and the CLEC is notified on the due date.	This is the only characteristic that can be measured for timeliness on these orders.
		Calculation	**Percent** = (a / b) X 100 • a = Total number of non-coordinated conversions completed on the due date with CLEC notification • b = Total number of non-coordinated conversions for the reporting period	This is the only characteristic that can be measured for timeliness on these orders.
		Report Structure	• CLEC Specific • CLEC Aggregate • Geographic Scope - State	These are the levels at which performance is evaluated.
		SQM Disaggregation – Analog / Benchmark	**SQM Level of Disaggregation** **SQM Analog/Benchmark** • Non-Coordinated Conversions ..... 95% Completed on Due Date with CLEC Notification	Benchmark is consistent with other hot cut benchmarks and performance greater than this level is not necessary to fulfill the nondiscrimination standard.
		SEEM Measure	**SEEM** **Tier I** **Tier II** Yes ..... X X	Only timeliness measure for this product and recognition that process may be critical for a transition period.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
	~~P-8~~		Delete Cooperative Acceptance Testing - % of xDSL Loops Successfully Passing Cooperative Testing	This is a secondary process designed to reduce troubles at installation on a small number of orders. The customer impacting event is the occurrence of a trouble, which is captured in the measure Percent Provisioning Troubles (PPT).
	PPT: Percent Provisioning Troubles within 5 Days of Service Order Completion	Title	~~P-9~~ PPT: ~~%~~ Percent Provisioning Troubles within ~~30~~ 5 Days of Service Order Completion	Most troubles connected to initial installation should be captured within 5 days of order completion. This has been the historical interval used to monitor retail performance also. A longer interval increase likelihood that non-installation troubles are reflected in the measure.
		Definition	This report measures ~~percent Provisioning troubles within 30 days of service order Completion measures~~ the quality and accuracy of the provisioning process by calculating the percentage of troubles received within 5 days of service order completion ~~activities~~.	Most troubles connected to initial installation should be captured within 5 days of order completion. This has been the historical interval used to monitor retail performance also. A longer interval increase likelihood that non-installation troubles are reflected in the measure.
		Exclusions	• Canceled Service Orders • Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, ~~Listing Orders,~~ Test Orders, etc.,~~)~~ ~~Test order types~~ which may be order types C, N, R, or T~~)~~ • ~~D & F~~ Disconnect O~~o~~rders • Trouble reports caused and closed out to Customer Provided Equipment (CPE) or CLEC Equipment • Listing Orders • Troubles outside of BellSouth's control	BellSouth should not be held accountable for any troubles outside their control (for example, cable cuts, acts of God, war, etc.) Listing orders were already excluded, they are simply listed separately.
		Business Rules	~~Measures the quality and accuracy of completed orders.~~ The first trouble report received after the completion of a service order ~~completion~~ is counted in this measure. ~~Subsequent trouble reports are measured in Repeat Report Rate.~~ When the completed service order is matched to a trouble report, it is uniquely counted one time in the numerator. ~~Reports are calculated~~ Candidates are identified by searching ~~in~~ the prior report period for all completed service orders and then searching for all trouble reports received within 5 days of the service order completion date. ~~following 30 days after completion of the service order for a trouble report issue date~~ ~~D & F orders are excluded as there is no subsequent activity following a disconnect.~~ ~~Note: Standalone LNP historical data is not available in the maintenance systems (LMOS or WFA).~~	Clarification D&F orders are not installation orders. LNP note is irrelevant.

Proposed Tennessee SQM Modifications

Domain	Measure No.	Section	Proposed Change	Rationale for Proposed Change
		Calculations	~~%~~ **Percent Provisioning Troubles within ~~30~~ 5 Days of Service Order ~~Activity~~ Completion** = (a / b) X 100 • a = ~~Trouble Reports on all~~ Total completed orders receiving a trouble report within 5~~30~~ days of the ~~following~~ service order(s) completion • b = All service orders completed in the previous report ing period ~~calendar month~~	Clarification and conversion to 5 day interval.
		Report Structure	• CLEC Specific • CLEC Aggregate • BellSouth Aggregate ~~• Reported in categories of <10 line/circuits; >= 10 line/circuits (except trunks)~~ ~~• Dispatch /Non-Dispatch (except trunks)~~ • Geographic Scope - State ~~- Region~~	Volume categories were eliminated because nearly all of the volume occurs in only one category. Dispatch/Non-Dispatch disaggregation is eliminated because it is not meaningful to distinguish between provisioning troubles that are dispatched or not, the important point is whether or not BellSouth had a provisioning trouble within 5 days of service order completion. Performance is evaluated by state so a regional report is unnecessary.