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VIA HAND DELIVERY

filed electronically in docket office on 07/07/10

Hon. Mary Freeman, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *AT&T Tennessee's SQM/SEEMs Plan*
Docket No. 04-00150

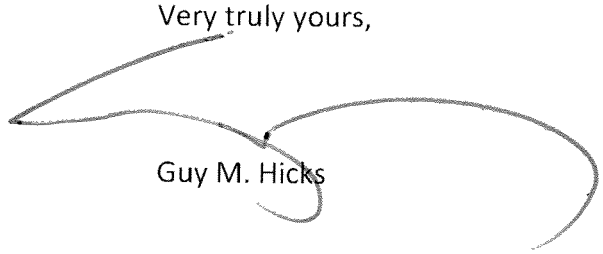
Dear Chairman Freeman:

AT&T has recently implemented certain system changes in the Southeast region. Specifically, AT&T retired the Local Exchange Navigation System ("LENS") interface for pre-order transaction and Local Service Request ("LSR") supplements as of July 3, 2010. As a result of the retirement of LENS, this completes the migration to the Local Service Request Exchange ("LEX") System interface. Interested parties, including Competitive Local Exchange Carriers ("CLECs"), have been advised of this change through standard CLEC communications, including monthly Change Control Process ("CCP") meetings and the following Accessible Letter ("AL"): CLECSES10-038 (dated April 21, 2010). The AL is available for review at the following web site: https://clec.att.com/clec/accletters/home.cfm?curMonth=yes

Although this OSS change does not substantively change the Service Quality Measurement Plan and SEEM Administrative Plan (collectively, "SQM/SEEM Plan"), the SQM/SEEM Plan documentation must be updated to accurately reflect the retirement of the LENS interface. Accordingly, AT&T has made minor, administrative updates to the SQM/SEEM Plan documentation. For the Authority's convenience, a red-lined version of the pages of the SQM/SEEM Plan which have been updated are included in this filing. The updated SQM/SEEM Plan will be available for review at the following website: http://pmap.wholesale.att.com/content/documentation.aspx . It is important to note that from a performance measurement perspective, the migration to the LEX interface will have ***no impact*** on the calculation of the OSS measures currently contained in the SQM/SEEM Plan. That is, AT&T will continue to report system response times provided to CLECs via the SQM measure known as OSS-1 [ARI]: OSS Response Interval, and will continue to report the availability of access to the systems as part of the SQM measure known as OSS-2 [IA]: OSS

Interface Availability. The method of calculation for the OSS-1 and OSS-2 metrics will not change and the results will continue to be reported on a monthly basis.

Very truly yours,



Guy M. Hicks

# BellSouth Service Quality Measurement Plan (SQM)

## Tennessee Performance Metrics

## Measurement Descriptions
## Version 3.~~05~~06

## Effective Data Month: ~~May 29~~July 3, 2010

Note: This version of the TN SQM was approved by the Tennessee Regulatory Authority (TRA) at the June 27, 2005 Agenda Conference, and was adopted by the TRA in its Order issued on August 25, 2005 in Docket 04-00150.This SQM version is issued to reflect the OSS architecture changes implemented on ~~May 29~~July 3, 2010.

## Introduction

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 the TRA Order issued on August 25, 2005 in Docket No. 04-00150 and modifications resulting from the implementation of OSS architecture changes on April 19, 2008, July 18, 2009, November 14, 2009, April 15, 2010, ~~and~~ May 29, 2010, and July 3, 2010.

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.

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.

## 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.

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.

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

# CM-5 [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 CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur:

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 |
|---|---|
| CSOTS | CLEC |
| ~~LENS~~ | ~~CLEC~~ |
| LEX | CLEC |
| Verigate | CLEC |
| XML Gateway | CLEC |
| EBTA | CLEC |
| TAFI | CLEC/BellSouth |

## SEEM Measure

| SEEM | Tier I | Tier II |
|---|---|---|
| No | | |

## 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.

**LASR**
Local Access Service Request-Negotiation system for entry and processing of Local Service Requests. Stores all LSRs received mechanically from CLECs. Tracks status of requests and associated service orders.

**LAUTO**
The automatic processor in 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.~~

**LERG**
Local Exchange Routing Guide – The official document which lists all North American Class 5 office (COs or end offices) and which describes their relationship to Class 4 office (tandem offices). Carriers use the LERG in the network design process.

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

**LEX**
Local Service Request Exchange (LEX) System – An AT&T browser based application for online creation, submittal, and maintenance of Local Service Requests (LSRs).

# Appendix C: OSS InterfaceTables

## OSS-1 [PRR]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)

**Table 1: Legacy System Access Times For RNS**

| System | Contract | Data | Avg. Sec. | # of Calls |
|---|---|---|---|---|
| RSAG | RSAG-TN | Address | x | x |
| RSAG | RSAG-ADDR | Address | x | x |
| ATLAS | ATLAS-TN | TN | x | x |
| DSAP | DSAP-DDI | Schedule | x | x |
| CRIS | CRSACCTS | CSR | x | x |
| OASIS | OASISBIG | Feature/Service | x | x |

**Table 2: Legacy System Access Times For R0S**

| System | Contract | Data | Avg. sec. | # of Calls |
|---|---|---|---|---|
| RSAG | RSAG-TN | Address | x | x |
| RSAG | RSAG-ADDR | Address | x | x |
| ATLAS | ATLAS-TN | TN | x | x |
| DSAP | DSAP-DDI | Schedule | x | x |
| CRIS | CRSOCSR | CSR | x | x |
| OASIS | OASISBIG | Feature/Service | x | x |

**Table 3: Legacy System Access Times For LENS/LEX/Enhanced Verigate (Pre-Order only)**

| System | Contract | Data | Avg. sec. | # of Calls |
|---|---|---|---|---|
| RSAG | RSAG-TN | Address | x | x |
| RSAG | RSAG-ADDR | Address | x | x |
| ATLAS | ATLAS-TN | TN | x | x |
| DSAP | DSAP-DDI | Schedule | x | x |
| CRIS | CRSECSRL | CSR | x | x |
| COFFI | COFFI/USOC | Feature/Service | x | x |
| P/SIMS | PSIMS/ORB | Feature/Service | x | x |

**Table 4: Legacy System Access Times For XML Gateway**

| System | Contract | Data | Avg. sec. | # of Calls |
|---|---|---|---|---|
| RSAG | RSAG-TN | Address | x | x |
| RSAG | RSAG-ADDR | Address | x | x |
| ATLAS | ATLAS-TN | TN | x | x |
| ATLAS | ATLAS-MLH | TN | x | x |
| ATLAS | ATLAS-DID | TN | x | x |
| DSAP | DSAP-DDI | Schedule | x | x |
| CRIS | CRSECSRL | CSR | x | x |
| P/SIMS | PSIM/ORB | Feature/Service | x | x |

Table 5: Legacy System Access Times for M&R (TAFI)

| System | BellSouth & CLEC | Count <= 10 |
|---|---|---|
| CRIS | x | x |
| DLETH | x | x |
| DLR | x | x |
| LMOS | x | x |
| LMOSupd | x | x |
| LNP Gateway | x | x |
| MARCH | x | x |
| OSPCM | x | x |
| Predictor | x | x |
| SOCS | x | x |
| NIW | x | x |

# OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)

## OSS Table 1: SQM Interface Availability for Pre-Ordering/Ordering

| OSS Interface Availability Application | Applicable to | % Availability |
|---|---|---|
| ~~LENS~~ | ~~CLEC~~ | ~~x~~ |
| LEX | CLEC | x |
| LASR | CLEC | x |
| WFM | CLEC | x |
| OBF | CLEC | x |
| Enhanced Verigate | CLEC | x |
| LESOG | CLEC | x |
| XML Gateway | CLEC | x |
| LNP Gateway | CLEC | x |
| COG | 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 |
| LFACS | CLEC/BellSouth | x |
| RNS | BellSouth | x |
| ROS | BellSouth | x |

# TENNESSEE SEEM ADMINISTRATIVE PLAN

**Tennessee Plan**
**Version 3.~~05~~06**

**Effective Date: ~~May 29~~July 3, 2010**

Note: This SEEM Administrative Plan version is issued to reflect the OSS architecture changes implemented on ~~May 29~~July 3, 2010.

## B.2 Tier 2 Submetrics

| Item No. | SQM Ref | Tier 2 Submetric |
|---|---|---|
| 1 | ARI | OSS-1 OSS Response Interval (Pre-Ordering/Ordering) – ~~LENS~~/Enhanced Verigate |
| 2 | ARI | OSS-1 OSS Response Interval (Pre-Ordering/Ordering) – LEX |
| 3 | ARI | OSS-1 OSS Response Interval (Pre-Ordering/Ordering) –XML Gateway |
| 4 | ARI | OSS-1 OSS Response Interval (Maintenance & Repair) |
| 5 | IA | OSS-2 OSS Interface Availability – (Pre-Ordering/Ordering) – Regional per OSS Interface |
| 6 | IA | OSS-2 OSS Interface Availability – (Maintenance & Repair) – Regional per OSS Interface |
| 7 | LMT | PO-2 Loop Makeup – Response Time – Electronic - Loop |
| 8 | AKC | O-2 Acknowledgement Message Completeness - Acknowledgments |
| 9 | FT | O-3 Percent Flow-Through Service Requests – Business |
| 10 | FT | O-3 Percent Flow-Through Service Requests – LNP |
| 11 | FT | O-3 Percent Flow-Through Service Requests – Residence |
| 12 | FT | O-3 Percent Flow-Through Service Requests – UNE-L (includes UNE-L with LNP) |
| 13 | FT | O-3 Percent Flow-Through Service Requests – UNE-P |
| 14 | RI | O-8 Reject Interval – Fully Mechanized |
| 15 | RI | O-8 Reject Interval – Partially Mechanized |
| 16 | RI | O-8 Reject Interval – Non Mechanized |
| 17 | FOCT | O-9 Firm Order Confirmation Timeliness - Fully Mechanized |
| 18 | FOCT | O-9 Firm Order Confirmation Timeliness - Partially Mechanized |
| 19 | FOCT | O-9 Firm Order Confirmation Timeliness - Non Mechanized |
| 20 | FOCT | O-9 Firm Order Confirmation Timeliness – Local Interconnection Trunks |
| 21 | FOCC | O-11 FOC & Reject Response Completeness – Fully Mechanized |
| 22 | FOCC | O-11 FOC & Reject Response Completeness – Partially Mechanized |
| 23 | FOCC | O-11 FOC & Reject Response Completeness – Non Mechanized |
| 24 | OAAT | O-12 Average Answer Time – Ordering Centers – CLEC Local Carrier Service |

## CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2010, a copy of the foregoing document was served on the following, via hand delivery, facsimile, overnight, electronic mail or US Mail, addressed as follows:

[ ] Hand
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