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November 5, 2004

Jean Stone, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Pkwy
Nashville, TN 37243-0505

Re: *In Re: BellSouth's Motion for the Establishment of a New Performance Assurance Plan*
Docket: 04-00150

Dear Ms. Stone

In response to the procedural schedule proposed by BellSouth in the above-captioned docket, the intervening competitive carriers¹ submit the following comments:

1. The Florida Public Service Commission has scheduled workshop-type meetings on November 8 and 9, 2004, to discuss, among other things, a procedural schedule to conclude that Commission's review of BellSouth's proposed new SQM and SEEM plans ("Performance Assessment Plan" or "PAP"). As soon as those dates are established, the Intervenor will notify the Hearing Officer and suggest, as needed, additional modifications to the TRA's schedule.

2. The Florida Commission is presently engaged in reviewing the same issues that are now pending before the TRA. The Florida Commission must define and, eventually, resolve literally hundreds of separate disputes. To manage this process, the Florida Commission has chosen to use a workshop-type format to define the issues and, where possible, negotiate agreements on particular measurements and penalties. After several months, the parties have been able to set forth the areas of dispute in an issues matrix and to resolve a number of issues. A copy of the current Florida issues matrix is attached.

The Intervenor believes that the TRA should adopt a similar approach which builds on, rather than repeats, the Florida experience. There seems little point, for example, in conducting extensive discovery concerning the parties' positions which have been thoroughly examined in Florida. That time would be better spent in workshops involving the parties and the TRA staff, similar to the workshop in Florida, at which the parties can define and narrow the issues. Absent

¹ A petition to intervene is being filed under separate cover

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such workshops, it will be practically impossible for the parties or the agency to manage this docket within a reasonable timeframe. There are simply too many complex issues at this point to fit into a typical "business-as-usual" schedule as proposed by BellSouth. These workshops should be scheduled to begin as soon as possible and should supplement the Florida workshops.

3 Following these workshops, the parties should be directed to file an issues matrix with the TRA, which sets forth BellSouth's and the CLECs' positions with respect to BellSouth's proposed changes to the Performance Assessment Plan. Because of the large number of contested issues likely to arise in this case and the complexity of those issues, a matrix will help both the parties and the agency

4 Based upon the issues matrix, the parties can then file testimony. BellSouth should file first, followed by testimony from the Intervenor. As the Movant, BellSouth should also be allowed to file rebuttal testimony.²

5. The Intervenor estimates that, absent substantial agreement among the parties, the TRA will need to set aside five to seven days for hearings. As previously noted, this case potentially involves hundreds of issues, many of them highly technical. The agency may also wish to consider assigning this matter to the Hearing Officer to hear the evidence and make recommended findings and conclusions. These decisions about the hearing, however, should be made following the submission of a joint issues matrix.

As indicated, the Intervenor will supplement these comments next week based upon the procedural dates established in Florida.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By



Henry Walker

HW/d
Enclosure

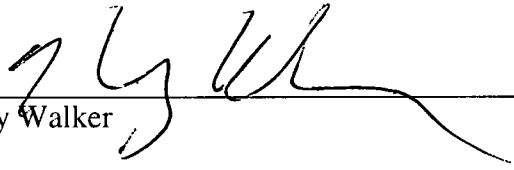
² If BellSouth's rebuttal raises new issues, the Intervenor may seek leave to file sur-rebuttal testimony

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded electronically and via U S Mail, postage prepaid, to:

Guy M. Hicks
BellSouth Telecommunications, Inc
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

on this the 5th day of November, 2004


Henry Walker

Proposed Florida SQM Modifications

Domain	Measurement	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.
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) 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 7392-U-12/30/97), LECG 1-7-0, the FCC's NPRM (CC Docket 98-56 RM9101 04/17/98), the Louisiana Public Service Commission (LPS-C) Order (Docket U-22252 Subdocket C-04/19/98), numerous arbitration cases, LPS-C sponsored collaborative workshops (10/98-02/00), and proceedings in Alabama, Mississippi, and North Carolina have and continue to influence the SQM. 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, May 15, 2003. This specific SQM is based on Order No. (to be determined) in LPS-C Docket No. (to be determined) 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, designs, above and o correct errors, and respond to both 3rd Party audit^s, requirements and the Florida PSC Orders of the FPSC, FCC, and the appropriate Courts of Law.	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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
			Upon a particular Commission's issuance of an Order pertaining to Performance Measure no. 10, Remedial Plans in a proceeding expressly applicable to all CLEC's, BellSouth shall implement such remedial measures and remedy plans covering its performance for the CLEC's as well as any changes to those plans ordered by the Commission on the date specified by the Commission. In exchange, BellSouth of the obligations to provide any CLEC's with a written contribution 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.	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
		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 of the month. 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. SEEM payments due will also be paid the 15th of the following month. For instance, May data will be posted in preliminary SQM reports on June 21. 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. <u>For details on SEEM, please refer to the SEEM Administrative Plan</u> BellSouth shall retain the performance measurement raw data files (SIDE) 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 SLD 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	CLEC SQM and SEEM reports will be considered delivered when posted to the website. The Florida Public Service Commission (FPSC) has State/Federal Commissions have been given access to the website. In addition, a copy of the SQM and Monthly State Summary reports will be filed with the FPSC as soon as possible after the last day of each month.	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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
OSS	OSS-I		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: OSS 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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	This measurement captures the functional availability of applications and interfaces. The interface availability (Full Outages) calculation is based upon availability of applications and interfaces. Applications utilized by CLECs for pre-ordering and ordering are 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 as defined as a scheduled function that is normally performed by the CLEC or is normally provided by an application or system is temporarily unavailable to the CLEC, which may function like 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 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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Calculation	<u>SQM Interface Availability (Full Outages)</u> = $(a+b) \times 100$ <u>Interface Availability (Full Outages)</u> = $(a-b) / a \times 100$ • a = Functional/Scheduled Availability Minutes • b = Scheduled Availability Full Outage Minutes <u>Interface Availability (Total Outages)</u> = $[a - (b + c + d)] / a \times 100$ • c = Loss of Functionality Minutes • d = Degraded Service Minutes	Clarify full outage calculation Added Total Outage calculation as described in the Business Rules
		Report Structure	• <u>Interface Type</u> • <u>Not-CLEC Specific</u> • <u>Legacy System/Interface Specific</u> • <u>Not-Product/Service Specific</u> • <u>Geographic Scope</u> - Regional Level	Report Structure changed to more clearly reflect the output report
		SQM Disaggregation – Analog / Benchmark	<u>SQM Level of Disaggregation</u> Interface Availability (Full Outages) Regional Level, Per-OSS Interface Interface Availability (Total Outages) <u>SQM Analog/Benchmark</u> ≥ 99.5% Diagnostic	Removed the redundant language for Full Outage and added Total Outage. When 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
	MRIA Interface	Title	(See Appendix D-C Tables for SQM OSS Interface Availability) <u>OSS-3 MRIA OSS Interface Availability (Maintenance & Repair)</u>	Modified Appendix D to list current applications captured in measurement Also to delete tables for deleted measures OSS-1 and OSS-4 Consistent nomenclature throughout the interface measures

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	Availability (Maintenance & Repair)	Definition	Percent of time applications are functionally available as compared to scheduled availability. Calculations are based upon availability of applications and interfaces 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
		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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	<u>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.</u> <u>Types of outages are defined as follows:</u> • 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 as <u>defined as - A system 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 of the customer normally performs or function normally provided by an application or system is unavailable to any customer.</u> • 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 client's experience slow response from the system or application <u>Total Outages include Full Outages, Degraded Services and Loss of Functionality minutes, and will be calculated to diagnostic purposes.</u> <u>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.</u>	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
		Calculation	<u>GSS Interface Availability (M&R) = (a/b) X 100</u> <u>Interface Availability (Full Outages) = (a - b) / a X 100</u> • a = Functional Scheduled Availability Minutes • b = Scheduled Availability Full Outage Minutes <u>Interface Availability (Total Outages) = (a - (b + c + d)) / a X 100</u> • c = Loss of Functionality Minutes • d = Degraded Services 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.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	• Interface Type • Not CLEC Specific • Not Product/Service Specific • Legacy System/Interface Specific • Geographic Scope • Regional Level	Report Structure changed to more clearly reflect the output report
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation Interface Availability (Full Outages) Regional Level Per-OSS Interface >= 99.5% Interface Availability (Total Outages) Diagnostic SQM Analog/Benchmark (See Appendix D, Tables for SQM OSS Interface Availability - M&R)	Removed the redundant language for Full Outage and added Total Outage. When 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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	QSS-4		Delete Response Interval (Maintenance & Repair)	Removal of this measure to streamline the measurement plan. The TAFI boxes cannot distinguish between the CLEC request and the BSI 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 (10 transactions in the last 5 months).
ERT Loop Makeup-Response Time - Electronic		Title	(PO-2) 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 Florida SQM Modifications

Domain	Measurement	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 LSRs 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, it 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
		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 = $(e / f) (g \cdot d) \times 100$ - e = Total LMUSIs received within the interval - f, d = Total number of LMUSIs processed within the reporting period	Clarify wording Remove statement about EDI as EDI now has preordering capability
		Report Structure	- CLEC Aggregate - CLEC Specific - Geographic Scope - State - Region - Interval for electronic LMUSIs 0 - <= 1 minute > 1 - <= 5 minutes > 5 - <= 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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation - Analog / Benchmark	SQM Disaggregation - Analog/Benchmark SQM Level of Disaggregation Loops SQM Analog/Benchmark 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 Florida 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.	This is a new measure that was filed in the Florida TRO hearing to address a new process that may have considerable volume
		Exclusions	• Projects not identified as UNE Bulk Migration • Weekends and holidays • Cancelled 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 (BOPID) 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	This is a new measure that was filed in the Florida TRO hearing to address a new process that may have considerable volume

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Calculation	<u>Response Interval</u> $\frac{(a-b)}{c}$ - a = Date BellSouth returns a response - b = Date the Bulk Migration Notification Form is received <u>Average Interval</u> $\frac{(e/f)}{d}$ - e = Sum of all response intervals - d = Total number of Bulk Migration Notification Forms received within the reporting period <u>Percent within interval</u> $(e/f) \times 100$ - e = Total Bulk Migration Notification Forms received within the interval - f = Total number of Bulk Migration Notification Forms processed within the reporting period	This is a new measure that was filed in the Florida TRO hearing to address a new process that may have considerable volume
		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 > 99 individual telephone numbers - > 4 Business days • JCO - <= 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	<u>SQM Level of Disaggregation</u> • 0 - <= 99 individual telephone numbers • 100 - <= 200 individual telephone numbers • > 201 individual telephone numbers <u>SQM Analog/Benchmark</u> Benchmark: 95% <= 4 Business Days Benchmark: 95% <= 6 Business Days 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	<u>SEEM</u> No Tier I Tier II	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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
Ordering	Q-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 (Q-2). If sent, measuring a few seconds of duration is irrelevant.
	AKC Acknowledgement Message Completeness	Title	(Q-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 measurement provides the percent of Messages <u>transmission/LSRs</u> received via EDI or TAG <u>ordering interface gateways</u> , 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 transmission/LSRs , which are electronically submitted by a CLEC. For these CLECs using 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. 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 <u>transmissions/LSRs</u> electronically submitted by EDI or TAG <u>ordering interface gateways</u> respectively - b = Total number of electronically submitted Messages <u>transmission/LSRs</u> received in the reporting period by EDI or TAG <u>ordering interface gateways</u> 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 Florida SQM Modifications

Domain	Measurement	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 PFT Acknowledgments TAG SQM Analog/Benchmark Benchmark <u>99.95%</u> Benchmark 99.9%	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 Yes Tier I Tier II X X	See SEEM matrix for rationale
	PFT Percent Flow-Through Service Requests	Title	(Q-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 Non-Parityability 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 suppressed before receiving a response so they do not have the opportunity to Flow Through

Proposed Florida SQM Modifications

Domain	Measurement	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 gateway (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-Cancellation Clarifications that are mechanically returned to the CLEC due to invalid data entry within the LSR Edit contained within the source system. LEO/LNP Gateway 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-Cancellation 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 system LEO/LNP Gateway 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 BOC RIS 5—Pending order review required 6—CSR inaccuracies such as invalid or missing CSR data in CRIS 7—Expedites (requested by the CLEC) 8—Details 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 (Identitions and Captions) 14—LNP Only—Supplement LSRs except supp of O-2 (Due Date Changes) on Reg 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

Proposed Florida SQM Modifications

Domain	Measurement	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 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 = $a / [b - (c + d + e + f)] \times 100$ 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 business system 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 = $a / [b - (c + d + e)] \times 100$ 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 a 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 Florida SQM Modifications

Domain	Measurement	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.
			<u>Notes</u> 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 CLECs 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.	
	Q-4		Delete Percent Flow-through Service Requests (Detail)	This data is now provided as part of the new measure PFT.
			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).
	Q-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).
	Q-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.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	RI Reject Interval	Title	(O-8) <u>RI</u> Reject Interval	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	Reject- The Interval is the average reject for the return of a reject. It is the response time from the receipt of a service request (Local Service Requests (LSRs) or Access Service Requests (ASRs)) 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-L 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/interfere.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 LISC 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 Florida SQM Modifications

Domain	Measurement	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 stamp in EDI or TAG) until that LSR is rejected back to the CLEC. Elapsed time for each LSR (date and time stamp 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 reject interval. Fully Mechanized The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI translator or TAG ordering interface gateway) until the LSR is rejected (date and time stamp or reject in EDI translator or TAG ordering interface gateway). 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 EDI translator or TAG ordering interface gateway) until the LSR is rejected (date and time stamp or reject in EDI translator or TAG ordering interface gateway) which falls out for manual handling. The step 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 gateway. 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 LSR) is received in the LCSC until notice of the reject (clarification) is returned to the CLEC via EON 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) Carier Interconnection Switching Center (CISC). Trunk data is reported as a separate category. 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 link connection website (http://www.inconnectionbellsouth.com/centers). Bulk Migrations: Requests for Bulk Migrations will come up to RollSouth 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.	Moved from Definition section Wording changes to allow consistent reflection of the gateway name as technology moves forward by using generic instead of referencing specific systems Clarification of business rules for non-mechanized LSRs Updated name of center processing ASRs for Local Interconnection Trunks Provided web address for hours of operations which are clearly defined on the Interconnection web site Provides Business Rules and definitions for the components of the new Bulk Migration process

Proposed Florida SQM Modifications

Domain	Measurement	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 = (e / d) e = 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 = Service requests rejected in reported interval - f = Total number of service requests rejected in reporting 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 Mechanized 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.

Proposed Florida SQM Modifications

Domain	Measurement	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 • Local Interconnection Trunks 0 - <= 18 hrs's 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
		SQM Disaggregation - Analog / Benchmark	SQM Level of Disaggregation • Resale - Residence Fully Mechanized • Resale - Business Partially Mechanized • Resale - Design (Special) Non-Mechanized • Resale PBX • Resale Centrex • Resale ISDN • LNP (Standalone) • LNP (Standalone) • 2W Analog Loop Design • 2W Analog Loop Non-Design • 2W Analog Loop with LNP Design • 2W Analog Loop with LNP Non-Design • 2W Analog Loop with LNP Non-Design SQM Analog/Benchmark Fully Mechanized: 97% <= 1 Hour Partially Mechanized: 95-99% <= 10 Hours Non-Mechanized: 95-85% <= 24-18 Hours	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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
			• UNE Digital Loop < DSL • UNE Digital Loop >= DSL • UNE Loop + Port Combinations • UNE Combination Other • UNE ISDN Loop • UNE Other Design • UNE Other Non-Design • UNE Line Splitting • HELs • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport • Local Interconnection Trunks	have 65% 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.
	FOCT Firm Order	Title	(G-9) FOCT Firm Order Confirmation Timeliness	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	Confirmation Timeliness	Definition	The Interval 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 UNF 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/ace.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 Florida SQM Modifications

Domain	Measurement	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 SON 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 a set 11 minute. The hours of operation can be found on the Interconnection website (http://www.interconnection.bellsouth.com/cenrtr). 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

Proposed Florida SQM Modifications

Domain	Measurement	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 = (e - f) / d - e = 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 - a) X 100 - e = Service requests confirmed in designated reporting interval - f = Total service requests confirmed in the reporting period	Removal of nonsequential 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.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		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 >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

Proposed Florida SQM Modifications

Domain	Measurement	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 line connection 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
		SQM Disaggregation - Analog / Benchmark	SQM Level of Disaggregation - Resale - Residence Fully Mechanized - Resale - Business Partially Mechanized - Resale - Design (Speech) Non Mechanized - Resale PBX - Resale Center - Resale ISDN - INP (Standardone) - INP (Standardone) 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop with INP Design 2W Analog Loop with INP Non-Design SQM Analog/Benchmark Fully Mechanized- 95% <= 3 Hours Partially Mechanized- 95 99% <= 10 Hours Non Mechanized- 95 99% <= 24 Hours	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 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 36 hours to 95% in 24 hours

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
			• 2W Analog Loop with LNP Design • 2W Analog Loop with LNP Non-Design • UNE Digital Loop < DSL • UNE Digital Loop > DSL • UNE Loop + Port Combinations • UNE Combination Other • UNE ISDN Loop • UNE Other Design • UNE Line Splitting • EFLs • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport • Local Interconnection Trunks	BellSouth is proposing 90% in 24 hours For Local Interconnection Trunks (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.
			Trunks: 95% <= 48 <u>10 Hours Days</u>	See SEEM Matrix for rationale
		SEEM Measure	SEEM Yes No	
			Tier I X	
			Tier II X	

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	Q-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	(Q-14) FOCRC Firm Order Confirmation and Reject Response Completeness	SQM measure identifier modified to ensure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	A response is expected from BellSouth for every LSR or Access Service Request (ASR) 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 Rejected/classified being sent • Fatal Rejects • LSRs identified as "Projects" with the exception of valid Projects ID's for UNF-P to UNF 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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	<u>Fully Mechanized</u> The number of FOCs or Auto-Connections 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) <u>Partially Mechanized</u> 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 <u>Non-Mechanized</u> 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) <u>Local Interconnection Trunks</u> Interconnection Trunks are ordered on Access Service Requests (ASRs) ASRs are submitted to and processed by the <u>Local Interconnection Service Center (LISC)</u> Carrier Interconnection Switching Center (CISC) <u>Trunk data is reported as a separate category.</u> <u>Bulk Migrations</u> 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. <u>For CLEC Results</u> 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. • 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	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		Clarification Results are monitored by state, so a regional report is unnecessary

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation - Resale-Residence Fully Mechanized - Resale-Business Partially Mechanized - Resale-Design (Speech) Non-Mechanized - Resale-PBX - Resale-Centrex - Resale-ISDN - LNP (Standalone) - LNP (Standalone) 2W Analog Loop-Design 2W Analog Loop-Non-Design 2W Analog Loop-with LNP Design 2W Analog Loop-with LNP Non-Design 2W Analog Loop-with LNP Design 2W Analog Loop-with LNP Non-Design - UNE Digital Loop < DSL - UNE Digital Loop >= DSL - UNE Loop + Port Combinations - UNE Combination-Other - UNE ISDN Loop - UNE Other Design - UNE Other Non-Design - UNE Line Splitting - FEFs - Switch Ports - UNE xDSL (ADSL, HDSL, UCL) - Line Sharing - Local Interoffice Transport - Local Interconnection Trunks SQM Analog/Benchmark 95% Returned 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 Yes Tier I X Tier II X	See SEEM Matrix for rationale

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	Q-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.
	SOAC Service Order Accuracy	Title	(P-HA) <u>SOAC Service Order Accuracy</u>	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, Lost Orders, using test OCs, etc., which may be coded under 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 identified as "Protect" • 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 Florida SQM Modifications

Domain	Measurement	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 order 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, 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 the measure	Removal of redundant language already covered in the Definition Clarification

Proposed Florida SQM Modifications

Domain	Measurement	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 Florida SQM Modifications

Domain	Measurement	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, S98YM, 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 Florida SQM Modifications

Domain	Measurement	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.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	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.
	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 time is the committed due dates and reported for Total missed 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.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Exclusions	- Orders et 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 Order types may be coded C, N, R or T) - Disconnect (D) & From (F) Orders - End User Mises, - 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
		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 reason.	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 $\frac{Met}{Total} = (a / b) \times 100$ - 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 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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	- CLEC Specific - CLEC Aggregate - BellSouth Aggregate - Report in Categories of <10 lines/circuits, >= 10 lines/circuits (except trunks) - Dispatch/Non-Dispatch (except Trunk) - 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.
		SQM Disaggregation - Analog / Benchmark	SQM Level of Disaggregation - Resale Residence (Non-Design) - Resale Business (Non-Design) - Resale Design - Resale PBX - Resale Center - Resale ISDN - LNP/INP (Standalone) - INP (Standalone) 2W-UNE Analog Loop (Design) 2W-UNE Analog Loop (Non-Design) 2W-UNE Analog Loop With LNP-Design 2W-UNE Analog Loop With LNP-Non-Design 2W-UNE Analog Loop With INP-Design 2W-UNE Analog Loop With INP-Non-Design - UNE Digital Loop < DSI - UNE Digital Loop >= DSI - UNE Loop + Port Combinations - Dispatch-In - Switch-Based - UNE Switch Ports - UNE Combo Other - UNE LELS SQM Analog/Benchmark - Retail Residence (Non-Design) - Retail Business (Non-Design) - Retail Design - Retail PBX - Retail Center - Retail ISDN - Retail Residence and Business (POTS) - Retail Residence and Business (POTS) (Dispatch) - Retail Residence and Business - (POTS) (Excluding Switch Based Orders) - Retail Residence and Business-Dispatch - Retail Residence and Business- (POTS) Excluding Switch-Based Orders - Retail Residence and Business-Dispatch - Retail Residence and Business- (POTS) Excluding Switch-Based Orders - Retail Digital Loop < DSI - Retail Digital Loop >= DSI - Retail Residence and Business - Dispatch-In - Switch-Based - Retail Residence and Business (POTS) - Retail Residence, Business and Design - Dispatch - Retail DSI/DS3	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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
			• UNE xDSL (HDSL, ADSL and UCL) Without Conditioning With Conditioning • UNE ISDN • UNE Line Sharing Without Conditioning With Conditioning • UNE Other Design • UNE Other Non-Design • Local Transport (Unbundled Interoffice Transport) • Local Interconnection Trunks • UNE Line Splitting Without Conditioning With Conditioning • UNE UDC/HDSL	
	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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Exclusions	• <u>Canceled Service Orders</u> • <u>Order activities of BellSouth or the CLEC associated with internal administrative use of local services (Record Orders, Test Orders, etc. which may be order types C, N, R, or T)</u> • <u>Disconnect Orders</u> • <u>'L' Appointment coded orders (where the customer has requested a later than offered interval)</u> • <u>End-User Caused Missed Appointments</u> • <u>Rejected LSRs</u> • <u>LSRs identified as 'Projects' with the exception of valid 'Projects IDs' for UNLP to UNI Loop Bulk Migrations</u> • <u>Scheduled OS's Maintenance</u> • <u>Listing Orders</u>	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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	For CLEC orders, the actual FOC interval and completion time will be 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 time 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/4 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 at 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 gateway) 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, a ordering interface gateway. Partially Mechanized. The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateway) 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 gateway. Non-Mechanized. The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time LSR 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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Calculation	<u>Firm Order Confirmation Completion Interval - (a - b)</u> - a = Service order completion date and time - b = Service request receipt date and time <u>Firm Order Confirmation Average Completion Interval - (c / d)</u> - 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 line service units, >= 6 line service units (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 Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change																																																																																																																						
		SQM Disaggregation – Analog / Benchmark	Performance Standard (FOCI) (OC1) <table><thead><tr><th>Disaggregation</th><th>Analog/Benchmark (OC1)</th><th colspan="3">Business Days (OC1) (Days Added to Interval)</th></tr><tr><th></th><th></th><th>FM</th><th>PM</th><th>NM</th></tr></thead><tbody><tr><td>Retail Residence (Non-Design)</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>Retail Business (Non-Design)</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>Retail Design</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF-RN? (Standard)</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Analog Loop Design</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Analog Loop Non-Design</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Digital Loop < DS</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Digital Loop >= DS</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Loop Per Combination</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF EELs</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF xDSL (HDSL, ADSL and LCL) without conditioning</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF xDSL (HDSL, ADSL and LCL) with conditioning</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Line Splitting without conditioning</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Line Splitting with conditioning</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF ISDN</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Other Design</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>UNF Other Non-Design</td><td></td><td></td><td>5</td><td>10</td><td>2.5</td></tr><tr><td>Local Interconnection Trunks</td><td></td><td></td><td></td><td></td><td>10</td></tr></tbody></table>	Disaggregation	Analog/Benchmark (OC1)	Business Days (OC1) (Days Added to Interval)					FM	PM	NM	Retail Residence (Non-Design)			5	10	2.5	Retail Business (Non-Design)			5	10	2.5	Retail Design			5	10	2.5	UNF-RN? (Standard)			5	10	2.5	UNF Analog Loop Design			5	10	2.5	UNF Analog Loop Non-Design			5	10	2.5	UNF Digital Loop < DS			5	10	2.5	UNF Digital Loop >= DS			5	10	2.5	UNF Loop Per Combination			5	10	2.5	UNF EELs			5	10	2.5	UNF xDSL (HDSL, ADSL and LCL) without conditioning			5	10	2.5	UNF xDSL (HDSL, ADSL and LCL) with conditioning			5	10	2.5	UNF Line Splitting without conditioning			5	10	2.5	UNF Line Splitting with conditioning			5	10	2.5	UNF ISDN			5	10	2.5	UNF Other Design			5	10	2.5	UNF Other Non-Design			5	10	2.5	Local Interconnection Trunks					10	Combines performance standards for FOC Timeliness and former OC1 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
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UNF Other Design			5	10	2.5																																																																																																																					
UNF Other Non-Design			5	10	2.5																																																																																																																					
Local Interconnection Trunks					10																																																																																																																					
		SEEM Measure	SEEM Yes ☒ No ☐ Tier I ☒ Tier II ☒	This is the measure of Ordering Timeliness and a high profile measure of provisioning timeliness although PMIA is the principal measure of provisioning timeliness This information is now included in the FOCI measure																																																																																																																						
	P-4		Delete Average Completion Interval (OC1) & Order Completion Interval Distribution																																																																																																																							

Proposed Florida SQM Modifications

Domain	Measurement	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 FOC1 and FOC2. 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 unbundled loops 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 NP and with NP , 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 Florida SQM Modifications

Domain	Measurement	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 TNP, 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. The interval is calculated for the entire cut-over 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 = $(a - b) \cdot c$ - a = Completion date and time for Cross Connection of a Coordinated Unbundled Loop of CLEC notified to - 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) = $(e/d) (d/c) \times 100$ - e = Total number of Coordinated Customer Conversions for each interval (loops) within <= 20 minutes - d = 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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	- CLEC Specific - CLEC Aggregate The interval breakout is 0.5 = 0 <= 5, 5 = 1.5 <= 5 <= 1.5, >= 1.5 = 1.5 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 report is unnecessary
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation - Unbundled Loops with INP (Coordinated Conversions) 95% <= 15 Minutes - Unbundled Loops with LNP 95% <= 15 minutes SQM Analog/Benchmark	Very low volume in INP To account for adding notification time to the interval
	HCT Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval	Title	(P-7A) <u>HCT Coordinated Customer Conversions – Hot Cut Timeliness Percent % within Interval and Average Interval</u>	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 entire conversion of an unbundled loop on a coordinated and/or a time specific order at a time 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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	This report measures whether BellSouth begins the cutover of an unbundled loop on a coordinated and/or a time specified 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 notify 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
		Calculation	% Percent within Interval = $(a / b) \times 100$ - 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 = $(e - d)$ - e = 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) - 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 Florida SQM Modifications

Domain	Measurement	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 Florida SQM Modifications

Domain	Measurement	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 - SL1 Non-Time-Specific - SL2 Time-Specific - SL2 Non-Time-Specific - SL1 IDLC - SL2 IDLC	The former disaggregations were not meaningful, the only relevant ones are the proposed disaggregations
	RT Coordinated Customer Conversions – Average Recover Time	Title	(P-7B) RT Coordinated Customer Conversions – Average Recover 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 unjustifiably 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 for vendors 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 Florida SQM Modifications

Domain	Measurement	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 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 Report Structure - CLEC Specific - CLEC Aggregate - Geographic Scope - State - Region	Clarification Add calculation for overall percentage, which is necessary to assess the value of these measurement results Performance is monitored by state so regional report is unnecessary
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation - Unbundled Loops with INP - Coordinated Customer Conversions (Loops) - Unbundled Loops with LNP SQM Analog/Benchmark ← 5 Hours ← 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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	PT Hot Cut Conversions - %	Title	(P-7C) <u>P1</u> Hot Cut Conversions - % <u>Percent</u> Provisioning Troubles Received within <u>7</u> <u>±</u> 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
	Provisioning Troubles Received within 5 Days of a Completed Service Order	Definition	This report measures the percentage of provisioning troubles received within <u>7</u> <u>±</u> days of a completed service order associated with a Coordinated and Non-Coordinated Customer Hot-Cut Conversion (CCC <u>measures and ensures</u> 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 <u>7</u> <u>±</u> 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 true date	Wording change to match title from 7 Days to 5 Days Calculation language is covered in the calculation section
		Calculation	% <u>Percentage of Provisioning Troubles within 7 ± Days of Service Order Completion</u> = (a / b) X 100 - a = The sum of all CCC Hot Cut Circuits with a trouble within <u>7</u> <u>±</u> days following service order(s) completion - b = The total number of CCC Hot Cut <u>Service Order</u> Circuits completed in the previous reporting period extended 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 report is unnecessary

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	SQM Analog/Benchmark • UNE Loops Design • UNE Loop-Non-Design ≤ 3.5% ≤ 3%	Design characteristic should have little, if any, affect on hot cut performance. Most of these loops are non-design so no need to maintain separate reporting.
		SEEM Measure	SEEM Yes No Tier I X Tier II 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 CLIC 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	- CLIC Canceled Service Orders - Delays Caused by the CLIC - Order activities of BellSouth or the CLIC associated with internal or administrative use of local services (Record Order, Test Order, etc.) which may be order types C, N, R, or I.	Situations outside of BellSouth's control.
		Business Rules	The order is considered successfully completed if the order is completed on the due date and the CLIC is notified on the due date.	This is the only characteristic that can be measured for timeliness on these orders.
		Calculation	Percent Completed and Notified on Due Date = $(a / b) \times 100$ a - Total number of non-coordinated conversions completed on the due date with CLIC 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	- CLIC Specific - CLIC Aggregate - Geographic Scope - State	These are the levels at which performance is evaluated.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation Non-C Coordinated Covertions SQM Analog/Benchmark 95% Completed on Due Date with CLF-C 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 Yes _____ Tier I _____ Tier II _____ X	Only timeliness measure for this product and recognition that process may be critical for a transition period.
	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 ± 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. The quality and accuracy of the provisioning process by calculating the percentage of troubles received within 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
		Exclusions	- Cancelled 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) - Disconnections: Orders - 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

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		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—Standard 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
		Calculations	<u>% Percent Provisioning Troubles within 30 ± 5 Days of Service Order Activity Completion</u> = (a / b) X 100 - a = Trouble Reports on all Total completed orders receiving a trouble report within ±30 days of the following service order(s) completion - b = All service orders completed in the previous reporting period calendar month	Clarification and conversion to 5 day interval
		Report Structure	• CLFC 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 regional report is unnecessary

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	P-11		Delete Service Order Accuracy	This measure is being replaced by (P-11A) SOAC, which was requested by CLECs
	LOOS LNP – Percent Out of Service < 60 Minutes	Title	(P-11B) LOOS_LNP – Percent Out of Service < 60 Minutes	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	This report measures the percentage of time that BellSouth performs electronic system updates within 60 minutes of receiving LNP data in its efforts to <u>number of LNP-related conversions where the time required to facilitate the activation of the port in BellSouth's network is less than 60 minutes, expressed as a percentage of total number of activations that took place.</u>	Wording clarification
		Exclusions	- CLEC Caused Errors - NPAC Caused errors unless caused by BellSouth - Standalone LNP orders with more than 500 number activations - Order activations 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	Performance on these types of orders does not affect CLECs BellSouth should not be penalized for legitimate maintenance downtime
		Business Rules	The interval starts when time is the <u>ESI Number Manager broadcast message is sent to BellSouth's gateway</u> <u>the NPAC broadcast activation message in BellSouth's LSMS.</u> The end time is the <u>confirmation receipt time in the local Service Management Systems (LSMS), which advises that BellSouth's electronic systems have successfully been updated.</u> A disconnect time for all telephone numbers contained within a order will be calculated and averaged to present a disconnect time for the order as a whole. <u>when the Provisioning event is successfully completed in BellSouth's network as reflected in BellSouth's LSMS. Count the number of activations that took place in less than 60 minutes.</u>	Wording clarification
		Calculations	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	When you miss one activation, you generally miss the entire order
		Report Structure	- CLEC Specific - CLEC Aggregate - Geographic Scope - State - Region	Performance is monitored by state so regional report is unnecessary

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change			Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation LNP			Performance greater than this level is not necessary to fulfill the nondiscrimination standard as evidenced by performance in other jurisdictions
		SEEM Measure	SEEM	Tier I	Tier II	See SEEM Matrix for rationale
			Yes	X	X	
	LAT LNP- Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date	Title	(b)(3)(C) LAT LNP- Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date			SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	This report measures the percentage of time BellSouth applies a 10-digit trigger for orders containing ported telephone numbers LNP FNs prior to the due date			Wording clarification
		Exclusions	- Remote Call Forwarding, DID's and ISDN Data FNs - Excludes 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			Exclude these classes of service that are not triggerable orders Cannot do work 1 day prior to the due date on zero due dated orders Administrative and Listing orders do not affect performance for CLECs on this measure Wording clarification
		Business Rules	Obtain the number of LNP FNs orders where the 10-digit trigger was applicable prior to the due date, divided by and the total number of LNP FNs orders where the 10-digit trigger was applicable			
		Calculation	Percentage of 10-Digit 1 trigger Applications = (a / b) X 100 - a = Count of LNP FNs orders for which 10-digit trigger was applied prior to due date - b = Total LNP FNs orders for which 10-digit triggers were applicable			Wording change to match Business Rules
		Report Structure	- CLEC Specific - CLEC Aggregate - Geographic Scope - State - Region			Performance is monitored by state so regional report is unnecessary

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
			SQM Level of Disaggregation • LNP (Standard) SQM Analog/Benchmark Benchmark >= 95%	Clarification
		SEEM Measure	SEEM Yes Tier I Tier II X X	See SEEM matrix for rationale
	DINT LNP - Disconnect Timeliness (Non-Trigger)	Title	(P-13D) DINT LNP - Average Disconnect Timeliness Interval (Non-Trigger)	Measure is not an interval but rather a percent within an interval
		Definition	This report measures the Disconnect timeliness percentage of time translations are removed from BellSouth's switch within 12 hours of the receipt of a non-triggereable port activation message. When multiple numbers are ported on a single order, translation is for each number must be improved within the interval. is defined as the interval between the time FST Number Manager receives the valid "Number Ported" message from NPAC (signifying the CLEC "Activate") until the time the Disconnect is completed in the Central Office switch. This interval effectively measures BellSouth responsiveness by isolating it from impacts that are caused by CLEC-related activities.	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 Orders, etc.) where identifiable Order types which may be order types C, N, R, or T) • Listing Orders • CLEC Caused Errors • NPAC-caused Errors, unless caused by BellSouth • Incomplete ports where only a subset of the total requested lines on the LSR are submitted via Activate Messages have been received compared with the LSR and create messages • Orders which are candidates for 10-digit triggers, except those that did not receive 10-digit triggers prior to the port-out date • LSRs where the CLEC did not contact BFT BellSouth within 30 minutes after Activate Message	Clarification Listing orders already excluded, just stated separately These orders by definition of the measure are not included, eliminate unnecessary exclusion

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	The Disconnect Timeliness Interval is determined for each telephone number ported associated with a disconnect service order processed on an LSR during the reporting period. The Disconnect Timeliness Interval 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 on the service order is disconnected in the BellSouth Central Office switch. Elapsed time for each ported number is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the total number of selected telephone numbers disconnected in the reporting period. Non-business hours will be excluded from the duration calculation for unscheduled after hours LNP ports. This will yield a benchmark equivalent to by 12:00 noon the next business day, thus, keeping the benchmark at 4 hours.	Wording clarification
		Calculations	Disconnect Timeliness Interval = $(a - 2b) \times 100$ - a = Completion Date and Time in Central Office switch for each number on disconnect order. Number of non-triggerable orders with translations removed in less than 12 hours. - b = Valid Number Ported message received date and time (total number of non-triggerable orders during report period) Average Disconnect Timeliness Interval = (c / d) - c = Sum of all Disconnect Timeliness Intervals - d = Total Number of disconnected numbers completed in reporting period	When you miss one telephone number, you generally miss all telephone numbers on that order This is a benchmark measure that only needs to have a percent within benchmark calculation, no average interval calculation is needed
		Report Structure	- CLEC Specific - CLEC Aggregate - Geographic Scope - State - Region	Performance is monitored by state so regional report is unnecessary
		SQM Disaggregation - Analog / Benchmark	SQM Level of Disaggregation LNP (Normal Working Hours and Approved After Hours) LNP (Unscheduled After Hours Ports) SQM Analog/Benchmark 95% <= 4-12 Hours 95% <= 4 Hours (excluding non-business hours)	No need to separate these two groups of orders, there is nothing unique about the provisioning of one versus the other
		SEEM Measure	SEEM Yes Tier I X Tier II X	See SEEM matrix for rationale

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
Maintenance & Repair	PRAM Percent Repair Appointments Met	Title	(M&R-1) <u>PRAM Missed Percent Repair Appointments Met</u>	Change measure to provide results based on what was done right instead of what was missed
		Definition	This report measures (The percentage of customer trouble reports not cleared by the committed date and time	Change measure to provide results based on what was done right instead of what was missed
		Exclusions	• Trouble tickets canceled at the CLEC request • BellSouth trouble reports associated with internal or administrative service • Customer Provided Equipment (CPE) Troubles or CLEC Equipment Troubles • Informational Tickets • Troubles Outside BellSouth's Control	Specifically state that informational tickets are not included. Since they are not trouble reports they have not been included in the measure. BellSouth should not be held accountable for any troubles outside their control (for example cable cuts, acts of God, war etc)
		Business Rules	The negotiated commitment date and time is established when the repair report is received. The cleared time is the date and time that BellSouth personnel clear the trouble and closes the customer trouble report in the <u>their</u> Computer Access Terminal (CAT) or workstation. If this is after the commitment time, the report is flagged as a 'missed commitment' or a 'missed repair appointment'. When the data for this measure is collected for BellSouth and a CLEC, it can be used to compare the percentage of the time repair appointments are missed due to BellSouth reasons. (No eAccess' reports troubles are not considered as a part of this measure because they are not a missed appointment) Note—Appointment intervals vary with force availability in the POTS environment—Specials and Frank intervals are standard interval appointments of no greater than 24 hours—Sundays and LNP historical data is not available in the maintenance systems (LMOS or WFA)	Clarification
		Calculation	Percentage of Missed Repair Appointments Met = (a / b) X 100 • a = Count of customer troubles not cleared by the quoted commitment date and time • b = Total customer trouble reports closed in the reporting period	The note is information and not needed for the measure
				Change calculation to agree with change in definition

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	- Dispatch/Non-Dispatch - CLEC Specific - CLEC Aggregate - BellSouth Aggregate - Geographic Scope - State - Region	Performance is monitored by state so regional report is unnecessary
		SQM Disaggregation – Analog/Benchmark	SQM Level of Disaggregation Resale Residence (Non-Design) Resale Business (Non-Design) Resale Design Resale PBX Resale Centrex Resale ISDN 2W UNE Analog (Loop Design) 2W UNE Analog Loop (Non-Design) UNE Digital Loop < DS1 UNE Digital Loop >= DS1 UNE Loop + Port Combinations UNE FTLs UNE Switchports UNE Combo-Other UNE xDSL (HDSL, ADSL and UCL) UNE ISDN UNE Line Sharing Splitting UNE Other Design UNE Other Non-Design Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks SQM Analog/Benchmark Retail Residence (Non-Design) Retail Business (Non-Design) Retail Design Retail PBX Retail Centrex Retail ISDN Retail Residence, & Business and Design (Dispatch) Retail Residence & Business (POTS) (Exclusion of Excluding Switch-Based Feature Troubles) Retail Digital Loop < DS1 Retail Digital Loop >= DS1 Retail Residence and Business Retail DSL/DSL Retail Residence and Business (POTS) Retail Residence, Business and Design Dispatch ADSL Provided to Retail Retail ISDN – BRI ADSL Provided to Retail Retail Design Diagnostic Retail Residence and Business Diagnostic Retail DSL/DSL Interface Party with Retail Trunks	Streamline 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 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. Modify product categories so that each product is reported only once. (Consolidated Disaggregation is the same for all M&R measures where appropriate.)
	CTRR Customer	Title	(M&R) CTRR Customer Trouble Report Rate	SQM measure identifier modified to facilitate better identification of metrics

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	Trouble Report Rate	Definition	This report measures the percentage of initial and repeated customer direct or referred customer troubles reported closed within a calendar month, per 100 lines/equipment in service .	Wording clarification
		Exclusions	• Trouble tickets canceled at the CLEC request • BellSouth trouble reports/lincs associated with internal or administrative service • Customer Provided Equipment (CPE) Troubles or CLEC Equipment Troubles • Informational Tickets • Troubles Outside of BellSouth's Control	Specifically state that informational tickets are not included. Since they are not trouble reports they have not been included in the measure. BellSouth should not be held accountable for any troubles outside their control (for example cable cuts, acts of God, war etc)
		Business Rules	Customer Trouble Report Rate contains all closed customer direct reports, including repeat reports, is computed by accumulating the number of maintenance initial and repeated trouble reports during the reporting period. The resulting number of trouble reports are divided by the total "number of service" lincs, ports or combinations that exist for the CLECs and BellSouth respectively at the end of the report month.	Wording clarification
		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 Service Access lines in <u>service</u> at end of the reporting period	Wording clarification
		Report Structure	• Dispatch/Non-Dispatch • CLEC Specific • CLEC Aggregate • BellSouth Aggregate • Geographic Scope • State • Region	Performance is evaluated by state so regional report is unnecessary

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation - Analog/Benchmark	SQM Level of Disaggregation - Resale Residence (Non-Design) - Resale Business (Non-Design) - Resale Design - Resale PBX - Resale Centrex - Resale ISDN 2W UNE Analog Loop (Design) 2W UNE Analog Loop (Non-Design) - UNE Digital Loop < DS1 - UNE Digital Loop >= DS1 - UNE Loop + Port Combinations - UNE LELs - UNE Switch Ports - UNE Combo-Other - UNE xDSL (HDSL, ADSL and UCL) - UNE ISDN - UNE Line Sharing Splitting - UNE Other Design - UNE Other Non-Design - Local Transport (Unbundled Interoffice Transport) - Local Interconnection Trunks SQM Analog/Benchmark - Retail Residence (Non-Design) - Retail Business (Non-Design) - Retail Design - Retail PBX - Retail Centrex - Retail ISDN - Retail Residence, and Business and Design (Dispatch) - Retail Residence and Business - (POTS) (Exclusion of) - Excluding Switch Based Feature Troubles) - Retail Digital Loop < DS1 - Retail Digital Loop >= DS1 - Retail Residence and Business - Retail DSL/DSL3 - Retail Residence and Business (POTS) - Retail Residence, Business and Design Dispatch - ADSL Provided to Retail - Retail ISDN - BRI - ADSL Provided to Retail - Retail Design Diagnostic - Retail Residence and Business Diagnostic - Retail DSL/DSL3 Interoffice - Party with Retail Trunks	Streamline 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 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. Modify product categories so that each product is reported only once. (Consolidated Disaggregation is the same for all M&R measures where appropriate.)
		SEEM Measure	SEEM Yes No Tier I X Tier II X	See SEEM Matrix for rationale
		MAD Maintenance Average Duration	MAD Maintenance Average Duration	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics.
		Title		
		Definition	This report measures the average duration of customer trouble reports, from the receipt of the customer trouble report to the time the trouble report is cleared.	The measure is simply defined here, the start and stop times are stated in the business rules and are unchanged.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Exclusions	• Trouble tickets canceled at the CLEC request • BellSouth trouble reports associated with internal or administrative service • Customer Provided Equipment (CPE) troubles or CLEC Equipment Troubles • Informational Tickets • Trouble outside of BellSouth's control	Specifically state that informational tickets are not included. Since they are not trouble reports they have not been included in the measure. BellSouth should not be held accountable for any troubles outside their control (for example cable cuts, acts of God, war etc)
		Business Rules	For average The duration the clock starts on the date and time of the receipt of the a correct report information correct telephone number, correct event identification, trouble description etc for the repair request The clock and stops on the date and time the service is restored and the BellSouth or CLEC customer is notified (when the technician completes the trouble ticket on his/her CAT or work systems) To tickets administered through WFA, (CLECs and BellSouth), durations do not include No Access, Delayed Maintenance and Referred Time	Worded clarification Clarification to explain that this time has already been excluded in the source data received from WFA. BellSouth should not be penalized for this time, which is outside its control. Performance is evaluated by state so regional report is unnecessary
		Report Structure	• Dispatch/Non-Dispatch • CLEC Specific • CLEC Aggregate • BellSouth Aggregate • Geographic Scope - State - Region	

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog/ Benchmark	SQM Level of Disaggregation Resale Residence (Non-Design) Resale Business (No-Design) Resale Design Resale PBX Resale Centrex Resale ISDN 2W UNE Analog Loop (Design) 2W UNE Analog Loop (Non-Design) UNE Digital Loop < DSI UNE Digital Loop >= DSI UNE Loop + Port Combinations UNE EELs UNE Switch ports UNE Combo Other UNE xDSL (HDSL, ADSL and UCL) UNE ISDN UNE Line Sharing Splitting UNE Other Design UNE Other Non-Design Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Streamline 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 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. Modify product categories so that each product is reported only once. (Consolidated Disaggregation is the same for all M&R measures where appropriate.)
			SQM Analog/Benchmark Retail Residence (Non-Design) Retail Business (No-Design) Retail Design Retail PBX Retail Centrex Retail ISDN Retail Residence, and Business and Design (Dispatch) Retail Residence and Business - (POTS) (Exclusion of Excluding Switch Based Feature Troubles) Retail Digital Loop < DSI Retail Digital Loop >= DSI Retail Residence and Business Retail DSL/DSL Retail Residence and Business (POTS) Retail Residence, Business & Design Dispatch ADSL Provided to Retail Retail ISDN – BRI ADSL Provided to Retail Retail Design-Diagnostic Retail Residence and Business Diagnostic Retail DSL-DSL Interoffice Party with Retail Links	
	PRT Percent Repeat Customer Troubles within 30 Days	Title	(M&R-4) PRT Percent Repeat Customer Troubles within 30 Days	Revised title to clarify that these are customer trouble reports
		Definition	Percent Customer Repeat Troubles within 30 Days measures the percent of customer troubles, during the current reporting period, that had at least one prior trouble ticket on the same line/segment, anytime in the preceding 30 calendar days from the receipt of the current trouble report. This report measures the percentage of customer trouble reports received within thirty days of a previous report.	Definition simplification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Exclusions	• Trouble tickets canceled at the CLEC request • BellSouth trouble reports associated with internal or administrative service • Customer Provided Equipment (CPE) troubles or CLEC equipment troubles • Internal Regional Tickets • Troubles outside of BellSouth's control	Specifically state that informational tickets are not included. Since they are not trouble reports they have not been included in the measure BellSouth should not be held accountable for any troubles outside their control (for example cable cuts, acts of God, war etc)
		Business Rules	This measure includes Customer trouble reports considered for this measure are <u>based on the same line/circuit</u>, received within 30 days of an original customer trouble report. Candidates for this measure are determined by using either the 'cleared date' from LMOS or the 'closed date' from WFA of the first trouble, and the 'received date' of the next trouble	Clarification of the Business Rules Specified which M&R systems use the 'cleared date' and 'closed date' language
		Calculation	Percent Repeat Customer Troubles within 30 Days = (a / b) X 100 • a = Count of repeat customer troubles reports using the <u>'received date'</u> where more than one trouble report was logged for the same service line/circuit, within a continuous 30 days period • b = Count of Total customer trouble reports using the <u>'cleared date'</u>, closed in the reporting period	Revised Calculation language to specify 'repeat' customer trouble reports and match the Business Rules Combined cleared date and closed date language, using closed in the reporting period
		Report Structure	• Dispatch/Non-Dispatch • CLEC Specific • CLEC Aggregate • BellSouth Aggregate • Geographic Scope - State — Region	Performance is evaluated by state so regional report is unnecessary

Proposed Florida SQM Modifications

Domain	Measurement	Section	SQM Level of Disaggregation	SQM Analog/Benchmark	Rationale for Proposed Change
		SQM Disaggregation – Analog/Benchmark	Resale Residence (Non-Design) Resale Business (Non-Design) Resale Design Resale PBX Resale Center Resale ISDN 2W UNE Analog Loop (Design) 2W UNE Analog Loop (Non-Design) UNE Digital Loop < DSL UNE Digital Loop >= DSL UNE Loop + Port Combinations UNE FFLs UNE Switch ports UNE Combo-Other UNE xDSL (HDSL, ADSL and UCL) UNE ISDN UNE Line Sharing Splitting UNE Other Design UNE Other Non-Design Local Interconnection Trunks	Retail Residence (Non-Design) Retail Business (Non-Design) Retail Design Retail PBX Retail Center Retail ISDN Retail Residence and Business (Design) Retail Residence and Business (Dispatch) Retail Residence and Business (POTS) (Exclusion of Excluding Switch-Based Feature Troubles) Retail Digital Loop < DSL Retail Digital Loop >= DSL Retail Residence and Business Retail DSL/DSL Retail Residence and Business (POTS) Retail Residence, Business and Design Dispatch ADSL Provided to Retail Retail ISDN – BRI ADSL Provided to Retail Retail Design Diagnostic Retail Residence and Business Diagnostic Retail DSL/DSL Interoffice Party with Retail Trunks	Streamline 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 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. Modify product categories so that each product is reported only once. (Consolidated Disaggregation is the same for all M&R measures where appropriate.)
	M&R-5		Delete Out of Service (OOS) > 24 Hours		Remove duplicative measures. Not required because it is simply another time distribution of the Maintenance Average Duration (MAD) measure. That measure provides in which product rollups the average exceeded 24 hours duration for a trouble report. Since maintenance durations greater than 24 hours normally involve an out of service condition, the information is actually captured in the MAD measure.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	AAT Average Answer Times – Repair Centers	Title	(AAR-6) <u>AAT</u> Average Answer Times – Repair Centers	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Exclusions	<u>Volume of Abandoned Calls</u>	The volume of abandoned calls cannot be captured by the Automatic Call Distributors. However, the time that the abandoned call was in the queue is included in the total answer time
		Business Rules	The <u>duration clock</u> starts when a CLEC representative or BellSouth customer makes a choice on the repair center's menu and is put in queue for the next repair attendant. <u>The clock stops when the repair attendant answers the call</u> <u>Abandoned calls are not included in the volume of calls reported but are included in total seconds</u>	Clarification of Business rules to state that abandoned calls are not counted in the volume but the time is included
		Calculation	<u>Note: The Total Column is a combined BellSouth Residence and Business number</u> <u>Answer Time for BellSouth Repair Centers = (a - b)</u> - a = Time BellSouth repair attendant answers call - b = Time of entry into queue after ACD selection <u>Average Answer Time for BellSouth Repair Centers = (c / d)</u> - c = Sum of all answer times - d = Total number of calls by 1313 reporting period	Wording Clarification
		SQM Level of Disaggregation – Analog/Benchmark	SQM Level of Disaggregation Region – CLEC/BellSouth Service Centers and BellSouth Repair Centers are regional SQM Analog/Benchmark For CLEC, Average Answer Times in UNE-Center and BRMC are comparable to the Average Answer Times in the BellSouth Repair Centers SQM Level of Disaggregation CLEC Average Answer Time <u>SQM Analog/Benchmark</u> BellSouth Average Answer Time	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	M&R-7		Delete Mean Time to Notify CLEC of Network Outages	There are few CLECs who want this process anymore. When first implemented, 480 CLECs were on the notification list for the region. Now there are only 161 for the region, a 2/3 reduction. To the extent that there are network outages, these troubles are captured in other measurements. The process for sending the notification for CLECs and retail are similar. BellSouth will continue to offer this service to any customer who asks for their name to be put on the E-Mail list, but the measurement of this process is not necessary.
BILLING	BIA Invoice Accuracy	Title	(B-1) BIA Invoice Accuracy	
		Definition	This measure provides reports the percentage of accuracy of the billing invoices rendered to CLECs during the current month by BellSouth to both wholesale and retail customers.	Wording Clarification
		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	Necessary to exclude adjustments that are not billing "errors." Examples include pricing changes, bankruptcy settlements.
		Business Rules	The accuracy of billing invoices delivered by BellSouth to the CLEC must enable them to provide a degree of billing accuracy comparable to BellSouth bills rendered to retail customers of BellSouth. CLECs request adjustments on bills determined to be incorrect. The BellSouth Billing verification process includes manually analyzing a sample of local bills from each bill period. The bill verification process draws from a mix of different customer billing options and types of service. An end-to-end auditing process is performed for new products and services. Internal measurements and controls are maintained on all billing processes. The CLEC specific raw data file (which is available on the DMAP web site) will contain the number of bills and adjustments for the reporting month. The number of bills and bill adjustments will be displayed by QCN and/or ACNA. 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.	The proposed deletions describe the bill verification process and are this process language does not belong in the business rules of a measurement. These deletions do have no bearing on the calculations. The inserted language clarifies the calculation.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Calculation	Invoice Accuracy = $[(a - b) / a] \times 100$ - a = Absolute value of total billed revenues during <u>current</u> report month - b = Absolute value of total billing error related adjustments during <u>current</u> report month <u>Measure of Adjustments</u> = $[(c-d) / c] \times 100$ - c = Number of Bills in current month - d = Number of Billing-related Adjustments in current month	Wording clarification Delete Measure of Adjustments- because it is not a meaningful measurement. There can be numerous adjustments to a single bill – all for valid reasons – and the result in this measurement is a negative number. As an example for the period Jun 2003 through May 2004, the Measure of Adjustment reported in FL ranged from a low of -7.656% to a high of 95% at the CLEC aggregate level
		Report Structure	- CLEC Specific - CLEC Aggregate - BellSouth Aggregate - Geographic Scope - State - Region - Number of Adjustments	Reporting at State Level. Regional results are not useful for State Commission Deletion of Number adjustments – see above
		SQM Disaggregation – Analog/Benchmark	SQM Level of Disaggregation Product/Invoice Type CLEC Invoice Accuracy Resale UNE Interconnection SQM Analog/Benchmark Party with BellSouth Retail Aggregate Retail Invoice Accuracy Retail Invoice Accuracy Retail Invoice Accuracy	Wording clarification. Moved SQM disaggregation below To clarify CLEC and retail comparisons
	BIT Mean Time to Deliver Invoices	Title	(B-2) BIT Mean Time to Deliver Invoices	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	This report measures the mean interval for timeliness of billing invoices sent to CLECs in an agreed upon format. CRIS-based invoices are measured in business days, and CAPS-based invoices in calendar days delivered to USPS (U.S. Postal Service) or transmitted to the customer in an agreed upon format.	Wording Clarification and to delete portion of definition that is actually a business rule

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	Invoice timeliness is determined by calculating the interval between the bill period date and actual transmission or distribution of the invoice. Bill Distribution is calculated as follows: CRIS-BILLS: The number of workdays reported for CRIS bills. This is calculated by counting the Bill Period date as the first workday. Weekends and holidays are excluded when counting workdays. JN-Bills are counted in the CRIS workday category for the purposes of the measurement once their billing account number (Q account) is provided from the CRIS system. To determine the number of workdays, begin counting the bill period date as the first workday on the next workday if the bill period date is a weekend or holiday. The invoice transmission date is counted as the last workday. Invoice transmission date is the workday the invoice is delivered to the Post Office or transmitted to the customer. CLEC bills and BellSouth bills transmitted in less than or equal to one day difference will be considered parity. CARS-BILLS: The number of calendar days is reported for CARS bills. This is calculated by counting the day following the Bill Period date as the first calendar day. Weekends and holidays are included when counting the calendar days.	Revised to more clearly state the calculation of invoice timeliness and to remove the separate language for CRIS and CARS bills. This business rule would apply to both. Evaluation of parity should be changed to bills delivered in ≤ 1-day difference will be considered parity. Under the current calculation the difference between CLEC and retail is frequently a fraction of one day. This numeric difference is not material nor does it reflect a material difference in customer service. The "b" term reworded to clarify the bill cycle close date.
		Calculation	Invoice Timeliness = (a - b) - a = Invoice Transmission Date - b = Close Date of Scheduled Bill Cycle Period Date Mean Time to Deliver Invoices = (c / d) - c = Sum of all invoice timeliness intervals - d = Count of invoices transmitted in reporting period	
		Report Structure	- CLEC Specific - CLEC Aggregate - BellSouth Aggregate - Geographic Scope - State - Region	Reporting at State Level. Regional results are Not useful for State Commission.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation - Analog/Benchmark	SQM Level of Disaggregation - Product/Invoice Type - State The average delivery intervals are compared as follows: - Resale CRIS - UNE CRIS - Interconnection CARS SQM Analog/Benchmark - CLEC Average Delivery Intervals for both CRIS and CARS invoices are comparable to BellSouth Average delivery for both systems	Wording clarification to more clearly show the how CLEC results are compared to retail results
	B-3		Delete Usage Data Delivery Accuracy measure	Not a key measurement since it captures the accuracy of the packs, not the content of the packs
	B-4		Delete Usage Data Delivery Completeness	Delete as duplicative This measurement is similar to B-5 Both measure Usage Data Delivery, but at different points B-4 measures at 30 days, B-5 measures at 6 days Both are not needed
	UDDT Usage Data Delivery Timeliness	Title	(B-5) UDDT Usage Data Delivery Timeliness	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	This measurement provides a percentage of reported measures recorded usage data (usage recorded by BellSouth and usage recorded by other companies and sent to BellSouth for billing) that is delivered to the appropriate CLEC within six (6) calendar days from the receipt of the initial recording. A party measure is also provided showing timeliness of BellSouth messages processed and transmitted via CMDS. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.	Wording clarification The last sentence referring to a retail comparison is not appropriate for this measurement which uses a benchmark
		Business Rules	The purpose of this measurement is to demonstrate the level of timeliness for processing and transmission of usage data delivered to the appropriate CLEC. The usage data will be mechanically transmitted or mailed to the CLEC data processing center once daily. 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.	Wording clarification to remove 'definition-type' language from the business rules

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	• CLEC Aggregate • CLEC Specific • Geographic Scope - Region	Wording clarification
		SQM Level of Disaggregation - Analog/Benchmark	SQM Level of Disaggregation Region Usage Data Delivery Timeliness SQM Analog/Benchmark >= 95% Delivered within 6 <u>Six</u> Calendar Days	Clarification
	B-6		Delete Mean Time to Deliver Usage	Should be eliminated. This measure is directly correlated to B-5 timeliness. B-5 measures % in 6 days and B-4 measures % in 30 days. B-6 is average days to deliver, but is not measuring anything additional that is meaningful.
	B-7		Delete Recurring Charge Completeness	B-7 and B-8 do not have a significant meaning to the CLEC or to the Commission. BellSouth does not bill the CLEC's end user and BellSouth's recurring and non recurring charges have little, if any, impact on the CLEC's billing to the end user.
				Both of these measurements pertain to getting the billing initiated when service is installed. If there is a problem, and the data for this measurement shows that there is not, the problem is self-correcting since BellSouth has the incentive to initiate billing commensurate with the installation of service.
	B-8		Delete Non-Recurring Charge Completeness	See B-7
	B-9		Delete Percent Daily Usage Feed Errors Corrected in "X" Business Days	This measure consistently has had no activity in the last 12 months.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	B-10		Delete Percent Billing Errors Corrected in "X" Business Days	As Staff is aware, there is significant volume in this measurement, but the dollar value of most of this volume is very small. While it is in the interest of the CLECs and BellSouth to resolve large billing disputes quickly, this measurement evaluates all disputes equally, regardless of the value.
Operator Services and Directory Assistance	OS-1		Delete Speed to Answer Performance / Average Speed to Answer – Toll	BellSouth is willing to consider another dispute timeliness metric.
	OS-2		Delete Speed to Answer Performance / Percent Answered within "X" Seconds – Toll	These measures are Party By Design. The architecture of the operator services processes and network are such that BellSouth handles retail and CLEC customers the same way. The KPMG audits in Georgia and Florida confirmed that this process is party by design.
	DA-1		Delete Speed to Answer Performance / Average Speed to Answer – Directory Assistance (DA)	See OS-1
	DA-2		Delete Speed to Answer Performance / Percent Answered within "X" Seconds – Directory Assistance (DA)	See OS-1
Database Update Information	DI-1		Delete Average Database Update Interval	Delete this measure because the update process is essentially party by design. The intervals for Directory Assistance and LIDB are the same or within 1 or 2 hundredths of an hour for both BST and CLEC. As an example, service order numbers are not assigned so as to identify it as a BST order or a CLEC order. As an order is completed it flows to the respective systems to be updated. The orders are not sorted, identified, or updated in any way that gives preference to any particular order. This measure has been verified as party by design by a KPMG audit.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
E911	E-2		Delete Percent Database Update Accuracy	Should be deleted since the accuracy of databases is also being assessed by the mechanized service order accuracy measurement
	E-3		Delete Percent NXXs and LRNs Loaded by the LERG Effective Date	This is not a key measurement and BellSouth's performance has been excellent. For example, BellSouth has achieved a 100% benchmark on this measure for the last 12 months. To the extent that there are problems with loading NXX and LRNs, these problems would affect the M&R measurements. Lastly, the CLECs are not interested in this metric as recent statistics shows CLECs rarely view this measure [From 11/03 through 5/04 only 12% of CLECs took the opportunity to view this report.]
	E-4		Delete Timeliness	This measurement should be eliminated because the E911 processes, including those measured by Timeliness, Accuracy and Mean Interval are Parity By Design. KPMG confirmed that it was parity by design in the GA and FL audits.
	E-5		Delete Accuracy	See E-1 above
	E-6		Delete Mean Interval	See E-1 above
Trunk Group Performance	TGPA Trunk Group Performance	Title	(TGP-1) TGPA Trunk Group Performance Aggregate	BellSouth is proposing to combine the current TGP-1 (Aggregate) and TGP-2 (CLEC Specific) measures into one measurement with an Aggregate and CLEC-specific dimension – similar to many ordering, provisioning and M&R metrics. By deleting Aggregate from the title, this will allow for combining of TGP-1 (Aggregate) and TGP-2 (CLEC specific) in one measure and still provide the same data.
		Definition	The Trunk Group Performance report displays, over a reporting cycle, average trunk group blocking data for each hour of each day of the reporting cycle, for both CLEC-affecting and BellSouth-affecting trunk groups. This measure report adds Trunk Group Blocking performances for both BellSouth and CLEC's.	Clarification and simplification of the definition to remove language that already appears (and is better suited) to the SQM sections for business rules and reporting structure.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Exclusions	- Trunk groups blocked due to unanticipated significant increases in CLEC traffic (An unanticipated significant increase in CLEC traffic is indicated by a 20% increase in small trunk groups or 1800 CCS for large groups over the previous months traffic when the increase was not forecasted by the CLEC) - Orders that are delayed or refused by CLEC - Trunk groups for which there was no 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	Wording clarification to better define 'significant increase'
		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. BellSouth should notify the CLEC when such blocking meets this exclusion criteria (orders that are delayed or refused by the CLEC) and report the results, both with and without the exclusions. 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 months traffic when the increase was not forecasted by the CLEC.	The third sentence is deleted. This is a BellSouth operational practice. It is not a measurement issue and does not affect the measurement. The fourth sentence is already captured in the exclusions. Removal eliminates duplicative language.
		Report Structure	- CLEC Specific - CLEC Aggregate - BellSouth Aggregate - Geographic Scope - State - With and Without Exclusion for Orders Delayed or Refused by CLEC	By adding CLEC Specific this allows for the deletion of TGP-2 Trunk Group Performance-CLEC Specific

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog/Benchmark	SQM Level of Disaggregation CLEC Aggregate and CLEC Specific SQM Analog/Benchmark BellSouth Aggregate Any consecutive 2 consecutive hours period in a 24-hours 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 Any consecutive 2-hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk group 1, 3, 4, 5, 10, and 16 for CLECs and 9 for BellSouth	By adding CLEC Specific this allows for the deletion of TGP-2 Trunk Group Performance – CLEC Specific
		SEEM Measure	SEEM Yes Tier I X Tier II X	By adding Tier for CLEC Specific this allows for the deletion of TGP-2 Trunk Group Performance – CLEC Specific
	TGP-2		Delete Trunk Group Performance – CLEC Specific	Combine this data with TGP-1 as noted above
Collocation	ART Collocation Average Response Time	Title	(C-4) ART Collocation Average Response Time	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	This report measures the average time (counted in calendar days) from the time BellSouth receives receipt of a complete and accurate collocation application (including receipt of application fee if required) to the date BellSouth returns a response electronically or in writing. BellSouth must respond as to whether or not space is available within the required number of calendar days as designated by the Collocation order after having received a bona fide application for physical collocation. BellSouth must respond with space availability and a price quote	Wording clarification
		Business Rules	The clock starts interval begins on the date that BellSouth receives a complete and accurate collocation application accompanied by the appropriate application fee if required. The clock interval stops on the date that BellSouth returns a response. The clock interval will restart upon receipt of changes to the original application request	Wording clarification. There really is no 'clock' associated with this measurement. Interval is a more suitable term

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	- Individual CLEC (alias) aggregate specific - CLEC Aggregate of all CLECs - Geographic Scope - State	Wording clarification
		SQM Disaggregation - Analog/Benchmark	SQM Level of Disaggregation - State Virtual - Virtual Initial-Physical Caged - Virtual Augment-Physical Cageless - Physical Caged-Initial Virtual Augment - Physical Caged Augment - Physical Cageless Initial - Physical Cageless Augment SQM Analog/Benchmark - Virtual—15 Calendar Days - Physical Caged—15 Calendar Days - Physical Cageless—15 Calendar Days 15 Calendar Days 15 Calendar Days 15 Calendar Days	Wording clarification to change "State" to "Virtual" "State" is not a disaggregation Clarification of SQM Disaggregation structure
	AT Collocation Average Arrangement Time	Title	(C-2) <u>AT</u> Collocation Average Arrangement Time	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	<u>This report</u> Measures the average time (counted in calendar days) from receipt of a complete and accurate bona fide firm order (including receipt of appropriate fee if required) to the date BellSouth completes the collocation arrangement and notifies the CLEC of its performance in provisioning a collocation arrangement.	Revision removes a phrase more appropriate for a Business Rule from the definition
		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	If the CLEC requests an interval outside the benchmark, a miss should not be counted
		Business Rules	The clock starts in interval for collocation arrangement begins on the date that BellSouth receives a complete and accurate bona fide firm order accompanied by the appropriate fee, if required, and ends—the clock stops on the date that BellSouth completes the collocation arrangement and notifies the CLEC. The table assignments associated with the specific collocation request will be provided prior to completion of the arrangement.	Wording revision to substitute interval for clock — more appropriate for this measurement. Some collocation requests do not require a fee. Last sentence deleted because it is a business practice that is in the individual CLEC's contract and should not be part of the measurement
		Report Structure	- Individual CLEC (alias) aggregate specific - CLEC Aggregate of all CLECs - Geographic Scope - State	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog/Benchmark	- State Virtual Initial Virtual-Augment (without space increase) - Virtual-Augment (with space increase) - Physical Caged-Initial (Ordinary) - Physical Caged-Augment (without space increase) - Physical Caged-Augment (with space increase) - Physical Cageless-Initial - Physical Cageless-Augment (without space increase) - Physical Cageless-Augment (with space increase)	Revised wording and line spacing to more closely conform to FL Order PSC-03-0011-CO-TP
	PMDD Collocation Percent of Due Dates Missed	Title	(C-3) PMDD Collocation Percent of Due Dates Missed	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	This report measures the percentage of missed due dates for both virtual and physical collocation arrangements	Wording clarification to broaden measurement definition to include all collocation arrangements. The disaggregations are listed below
		Business Rules	Percent Due Dates Missed is the percentage of total collocation arrangements which BellSouth is unable to complete by end-of-the BellSouth committed due date. The arrangement is considered a missed due date if it is not completed on or before the committed due date.	Wording clarification. The deleted sentence is redundant
		Calculation	$\% \text{ Percent of Due Dates Missed} = (a / b) \times 100$ - a = Number of completed orders collocation arrangements that were not completed by the BellSouth committed due date during in the reporting period - b = total number of orders collocation requests completed in the reporting period	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	- Individual CLEC Specific (alias)-aggregate - CLEC Aggregate of all CLECs - Geographic Scope - State	Wording clarification
		SQM Disaggregation – Analog/Benchmark	State-Virtual Physical Virtual-Initial Virtual-Augment Physical Caged-Initial Physical Caged-Augment Physical Cageless-Initial Physical Cageless-Augment >= 95% on time >= 95% on time >= 95% on time >= 95% on time >= 95% on time >= 95% on time >= 95% on time	Disaggregation and benchmark clarification
		Title	{CMN} CMN: Timeliness of Change Management Notices	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
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.	Wording clarification, primarily to add a definition of the CCP which is used elsewhere in the Change Management metrics. This definition has been moved from the business rules section
		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)	Minor wording clarification
		Business Rules	This metric is designed to measure the percent of change management notices sent to the CLECs according to notification standards and timelines set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces. The clock starts interval begins on the notification date. The clock stops 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 clock 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.	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation • Region Notices SQM Analog/Benchmark 98% on time	Wording Clarification
	(CM-2)		Delete Change Management Notice Average Delay Days	CM-2 is not needed because it only measures those notices missed in the CM-1 measurement above. In order for any activity to appear in this measurement, it has to have failed CM-1. Therefore it is duplicative.
	CMD	Title	(CM-1) CMD Timeliness of Documents Documentation Associated with Change	Wording Clarification
		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. <u>The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth legal interfaces.</u>	Wording clarification, primarily to add a definition of the CCP which is used elsewhere in the Change Management metrics. This definition has been moved from the business rules section.
		Exclusions	• Documentation for release dates that slip less than 30 days for reasons outside BellSouth's control, such as changes due to Regulatory, including a change mandated by regulatory or legal entities (Federal Communications Commission (FCC), a state commission/authority, or state and federal courts) or CLEC request • Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process	Wording clarification
		Business Rules	The clock starts interval begins on the date the business rule documentation is released date The clock stops 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 clock interval would restart. This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to the documentation standards and timeframes set forth in the Change Control Process, a copy of which can be found at on the Interconnection website (http://www.interconnection.bellsouth.com/markets/lec/ccp/live/index.html). The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Legal Interfaces.	Clarified the determination of time calculation interval is a more appropriate term than clock for this metric.
		Calculation	Timeliness of Documents Documentation Associated with Change = (a / b) X 100 - a = Change Management documentation sent within required timeframes after notices - b = Total number of Change Management documentation sent	Moved CCP definition from Business Rules section to Definition.
			Timeliness of Documents Documentation Associated with Change = (a / b) X 100	Change calculation title to match measurement title change.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		SQM Disaggregation - Analog / Benchmark	SQM Analog/Benchmark 98% on Time	Wording Clarification
	(CM-4)		Delete Change Management Documentation Average Delay Days	CM-4 is not needed because it only measures those documentation releases missed in the CM-3 measurement above. In order for any activity to appear in this measurement, it has to have failed CM-3. Therefore it is duplicative.
	ION Notification of CLEC Interface Outages	Title	(CM-5) ION Notification of CLEC Interface Outages	SQM measure identifier modified to facilitate better identification of metrics.
		Definition	This report measures the time it takes BellSouth to notify the CLEC of an outage of an interface outage as defined by the Change Control Process (CCP) documentation.	Wording clarification to better define an 'outage'.
		Business Rules	This metric measures the process of notifying CLECs of an interface outage as defined by the Change Control Process documentation. 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 on or more of the following conditions occur: 1. BellSouth can duplicate a CLEC reported system error. 2. BellSouth finds an error message within the system error log that identically matches a CLEC reported system outage. 3. When 3 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. Note: The 15-minute clock 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 clock interval begins at the point of verification. This metric will be expressed as a percentage.	Wording clarification per the KPMG Florida Exception 81 and to change clock to interval which is a more appropriate term for this measurement.
	PSEC Percentage of Software Errors Corrected in "X" Business Days	Title	(CM-6) PSEC Percentage of Software Errors Corrected in "X" (40-30-45) Business Days	SQM measure identifier modified to facilitate better identification of metrics.
		Definition	This report measures the percentage of all outstanding software errors, due and overdue, to be corrected by BellSouth in "X" (40-30-45) business days within the monthly report period.	Wording clarification.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Business Rules	This metric is designed to measure BellSouth's performance each month in correcting identified software errors within the specified interval. The clock starts interval begins when a Software Error is validated per the Change Control Process (CCP), a copy of which can be found at http://www.interconnection.bellsouth.com/markets/sec/sep-five/index.html and stops 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/sec/sep-five/index.html. The monthly report should include all defects, due and overdue, to be corrected within the report period. Software defects are defined as Type 6 Change Requests in the Change Control Process.	First sentence is a definition, not a business rule. Remaining changes are for clarification.
		Calculation	Percentage of Software Errors Corrected in "X" (10, 30, 45) Business Days = (a / b) X 100 - a = Total number of software errors corrected where in "X" = 10, 30, or 45 business days as defined for each severity level (Severity 2, Severity 3, and Severity 4) - b = Total number of Severity 2, Severity 3, and Severity 4 software errors requiring correction where "X" = 10, 30, or 45 Business Days corrected.	Wording clarification
		Report Structure	- Severity 2 = 10 Business Days - Severity 3 = 30 Business Days - Severity 4 = 45 Business Days - Geographic Scope - Region	Report Structure changed to region since this software errors are resolved for the region
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation Region Error SQM Analog/Benchmark 95% within Interval	Wording clarification
	PCRAR Percentage of Change Requests Accepted or	Title	(6M-7) PCRAR Percentage of Change Requests Accepted or Rejected Within 10 Days	SQM measure identifier modified to facilitate better identification of metrics
		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	Wording clarification
		Exclusions	Change requests that are canceled or withdrawn before a response from BellSouth is due	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	Rejected Within 10 Days	Business Rules	The acceptance/rejection interval starts begins when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at on the interconnection website (http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/index.html). The eleek 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 not just those received and accepted or rejected in the reporting period .	Wording clarification
		Calculation	Percentage 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 submitted responded to within the reporting period	Wording clarification
		Report Structure	- BellSouth Aggregate - Geographic Scope - Region	Report Structure changed to region since this process is at the region level
		SQM Disaggregation – Analog / Benchmark	SQM Level of Disaggregation Region Requests Accepted/Rejected SQM Analog/Benchmark 95% within Interval	Wording clarification
	PCRR Percent Change Requests Rejected	Title	(CAA 4) PCRR Percent Change Requests Rejected	SQM measure identifier modified to facilitate better identification of metrics
		Definition	This report Measures the percentage of change requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period	Wording clarification. The words 'by reason' are being eliminated from the definition as it is more appropriately addressed in the business rules and the disaggregation
		Exclusions	Change requests that are canceled or withdrawn before a response from BellSouth is due	Wording clarification
		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 rejections per the Change Control Process, a copy of which can be found at on the interconnection website (http://www.interconnection.bellsouth.com/markets/lcc/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 not just those received and accepted or rejected in the same reporting period.	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Calculation	Percent Change Requests Rejected = (a / b) X 100 - a = Total number of change requests rejected - b = Total number of change requests submitted responded to within the reporting period	Wording clarification
		Report Structure	- BellSouth Aggregate - Cost - Technical Feasibility - Geographic Scope - Region	Report Structure changed to region since this process is at the region level
		SQM Level of Disaggregation – Analog / Benchmark	- Region - Reason – Cost - Reason – Technical Feasibility - Reason – Industry Direction - Diagnostic - Diagnostic - Diagnostic - Diagnostic	Wording clarification
	NDPR Number of Defects in Production Releases (Type 6 CR)	Title	(GM-9) \NDPR Number of Defects in Production Releases (Type 6 CR)	SQM measure identifier modified to facilitate better identification of metrics
		Definition	This report measures the number of defects in production releases. This measure will be presented as the number of Type 6 Severity 4, 2, and 4 defects, the number of Type 6 Severity 3, 4, and 4 defects without a mechanized work around, and the number of Type 6 Severity 3, 4, and 4 defects resulting within a three week period from a production release date. The definition of Type 6 Change Requests (CR) and Severity 4, 2, and 4 defects can be found in the Change Control Process document.	Wording changes to correct a mistake in the labeling the severity defects. The current definition specifies Severity 1, 2, and 3. However Severity 1 defects are actually system outages, not defects in production releases. Defects in production releases are Severity 2, 3, and 4.
		Business Rules	This metric measures the number of Type 6 Severity 4, 2, and 4 defects, the number of Type 6 Severity 3, 4, and 4 defects without a mechanized work around, and the number of Type 6 Severity 3, 4, and 4 defects resulting within a three week period from a production release date. The definitions of Type 6 Change Requests (CR) and Severity 4, 2, and 4 defects can be found in the Change Control Process, which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html .	Corrects the Severity level numbers Additional clarification of the CCP
		Calculation	The number of Type 6 Severity 4, 2, and 4 defects, the number of Type 6 Severity 3, 4, and 4 defects without a mechanized work around, and the number of Type 6 Severity 3, 4, and 4 defects	Corrects the Severity level numbers
		Report Structure	- Production Releases - Number of Type 6 Severity 4, 2, and 4 defects - Number of Type 6 Severity 3, 4, and 4 defects without a mechanized work around - Number of Type 6 Severity 3, 4, and 4 defects - Geographic Scope - Region	Corrects the Severity level numbers Noted that this is a regional metric

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	SV Software Validation		SQM Level of Disaggregation Region—Number of Type 6 Severity 4,2 Defects Region—Number of Type 6 Severity 3,1 Defects without a mechanized work-around Region—Number of Type 6 Severity 3,4 Defects (GM-14) SV Software Validation	Corrects the Severity level numbers
		Title		SQM measure identifier modified to facilitate better identification of metrics
		Definition	This report measures software validation test results for production releases of BellSouth local interfaces	Wording clarification
		Business Rules	BellSouth maintains a test deck of transactions that are used to validate that functionality in software production releases works as designed. Each transaction in the test deck is assigned a weight factor which is based on the weights that have been 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 at on the http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html	Wording clarification
		Report Structure	- BellSouth Aggregate - Geographic Scope - Region 1	Report Structure changed to region since this process is at the region level
		SQM Disaggregation - Analog / Benchmark	SQM Level of Disaggregation Region Failed Transactions SQM Analog/Benchmark <=5%	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
	PCRIP Percentage of Change Requests Implemented within 60 Weeks of Prioritization	Title	(6M-11) <u>PCRIP</u> Percentage of Change Requests Implemented within 60 Weeks of Prioritization	SQM measure identifier modified to insure consistency with the PARIS measure identifiers and facilitate better identification of metrics
		Definition	<u>This report measures whether BellSouth provides CLECs timely implementation of prioritized change requests.</u>	Wording clarification
		Exclusions	- Change requests that are implemented later than 60 weeks with the consent of the CLECs - Change requests as verified when BellSouth has regulatory authority to exceed the interval	Wording clarification
		Business Rules	<u>This metric is designed to measure BellSouth's monthly performance in implementing prioritized change requests. The clock starts interval when a for each change request begins when it has first been prioritized by BellSouth and made available to the CLECs—BellSouth will begin reporting this monthly measure with the next release for diagnostic purposes; and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.</u>	First sentence eliminated as it is not a business rule. Remaining changes are proposed as the language in the original measurement, when first ordered by the FL PSC, is no longer needed in the future.
		Calculation	Percentage of Type 5 CLEC Initiated Change Requests Implemented on Time = (a / b) X 100 - a = Total number of prioritized Type 5 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 each month that are less than or equal to 60 weeks of age from the date of their first prioritization plus all other prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization. - b = All entries in "a" above plus all Total number of prioritized Type 5 Change Requests implemented within the data month prioritized more than 60 weeks before the end of the monthly reporting period. Percentage of Type 4 BellSouth Initiated Change Requests Implemented on Time = (a-b) / (c / d) X 100 - a = Total number of prioritized Type 4 Change Requests implemented within the data month having an implementation interval less than or equal to 60 weeks from the release prioritization date each month that are less than or equal to 60 weeks of age from the date of the release prioritization list plus all other Type 4 prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization. - b = Total number of prioritized Type 4 Change Requests implemented more than 60 weeks before the end of the monthly reporting period. - c = Total number of prioritized Type 4 Change Requests implemented more than 60 weeks before the end of the monthly reporting period. - d = Total number of prioritized Type 4 Change Requests implemented more than 60 weeks before the end of the monthly reporting period.	Wording clarification

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		Report Structure	• Bellsouth Aggregate • Type 4 Requests Implemented • Type 5 Requests Implemented • 94 Percent implemented within 16, 32, 48 and 60 weeks • <u>Geographic Scope</u> - <u>Region</u>	Report Structure changed to region since this process is at the region level
		SQM Level of Disaggregation – Analog/Benchmark	Region • Type 4 Requests Implemented • Type 5 Requests Implemented	Wording clarification
		SEEM Measure	SEEM Yes Tier I Tier II X	
Appendix A		Reporting Scope	Delete Appendix A – Reporting Scope	
Appendix B A		Glossary of Acronyms and Terms	The Glossary contains updates and corrections	

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
Appendix C B		BellSouth Audit Policy	Appendix CB: BellSouth Audit Policy C-1: BellSouth's Internal Audit Policy BellSouth's internal efforts to make certain that the reports produced by the PMAP platform are of the highest accuracy has been formalized into a Performance Measurements Quality Assurance Plan (PMQAP) that documents and augments existing quality assurance processes integral to the production and validation of Performance Measurement data. The plan consists of three sections: 1—Change Control addresses the quality assurance steps involved in the introduction of new measurements and changes to existing measurements. 2—Production addresses the quality assurance steps used to create monthly SQM reports. 3—Monthly Validation addresses the quality assurance steps used to ensure accurate posting of monthly results. The BellSouth PMQAP will ensure that BellSouth effectively and consistently provides accurate performance measurements data for the activities included in the SQM. The BellSouth Internal Audit department will audit this plan and its quality assurance steps annually beginning in 4Q04. C-2: BellSouth's External 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 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 comprehensive audit of its Performance Metrics Quality Assurance Plan (PMQAP) the current year aggregate level reports for both BellSouth and the CLECs every other year for each of the next five (5) years (2004-2005, 2005-2010) to be conducted by an independent third party auditor jointly selected by BellSouth and the CLEC. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. Requested This aggregate level audits includes the following specifications	These revisions conform to the audit plan discussed with the FL PSC Staff

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		BellSouth Audit Policy	1 The cost shall be borne 50% by BellSouth and 50% by the CLEC or CLECs expressing their contractual rights. If no party is sharing the costs of this audit, BellSouth may utilize its internal auditing organization to conduct the audit. 2 Should all the independent third party auditor shall be selected required, with input from it shall be selected by BellSouth, with input from the PSC, if applicable, and the CLEC(s) other parties bearing the cost of the audit. 3 BellSouth, the PSC and the CLECs shall jointly determine the scope of the audit. Due to the regional nature of the processes used to generate performance metrics data, BellSouth will agree to no more than one regional third party audit within its region per year. These comprehensive audits are intended to provide the basis for the PSCs and CLECs to determine that the SQM and PMAP and SEM produce accurate data that reflects each State's Order for performance measurements. Once this has been verified by an initial audit, the BellSouth PMQAP will provide the basis for future audits. BellSouth reserves the right to make changes to this audit policy as growth and changes in the industry dictate.	
Appendix D-C:		QSS-Interface Tables	Updated Interface Availability (IA) and Interface Availability (Maintenance and Repair) (MRIA) tables OSS-1 removed from Interface Tables OSS-4 removed from Interface Tables	Updates to reflect current applications in Interface Availability (IA) and Interface Availability (Maintenance and Repair) (MRIA) OSS-1 and OSS-4 measures were deleted from the SQM

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
Appendix D		<u>BellSouth's Policy on Reposting of Performance Data and Recalculation of STEM Payments</u> <u>BellSouth's Reposting Policy</u>	BellSouth will make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Incentive Mechanism (SEEM) payments using the Parity Analysis and Remedial Information System (PARIS) to the extent it is technically feasible, under the following circumstances: - 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 PWAP website advising CLICs when reposted data is available. - Performance sub-metric calculations that result in a shift in the performance in the aggregate from a "in parity" condition to an "out of parity" condition will be available for reposting. - Performance sub-metric calculations with benchmarks that are in an "out of parity" condition will be available for reposting, whenever there is a $\pm 2\%$ decline in BellSouth's performance at the sub-metric level. - 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. - 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 analogues. The sub-metric level to qualify for reposting. - Performance data will be made available for a maximum of three months in arrears. - 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 on the date when the payment error was discovered. - 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. - 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 adjustment should be made in accordance with the normal process used to address CLIC questions related to SEEM payments.	This Appendix incorporates into the SQM the Commission approved Reposting policy
Appendix E		<u>Description of Raw Data and Other Supporting Data Files (OSDF)</u>	BellSouth Service Quality Measurement Plan (SQMP) Raw (Supporting) Data Files (SDF) Other Supporting Data Files (OSDF)	These additions are proposed to incorporate what had been separate documents for the supporting/raw data files into the SQM. There are 2 1/2 pages of Appendix E.

Proposed Florida SQM Modifications

Domain	Measurement	Section	Proposed Change	Rationale for Proposed Change
		LSR Flow Through Matrix	The current version of the LSR Flow-Through Matrix is on BellSouth's PMAP website (http://pmap.bellsouth.com) in the Documentation/Exhibits folder and contains a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through	As a result of flow through improvement efforts, the flow through capability of products occasionally changes from not eligible for flow through to one that is flow through capable. Placing this matrix on the PMAP website will allow it to be current



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August 18, 2004

BY ELECTRONIC FILING

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Pursuant to Staff's memorandum dated August 16, 2004, attached please find the CLEC Coalition's Comments into the matrix addressing proposed modifications to BellSouth's Performance Assessment Plan in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/las
Attachment
cc: Parties of Record

CLEC COALITION RESPONSE

August 27, 2004

BellSouth and CLEC-Proposed Florida SQM Modifications

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
SQM Introduction/Report Publication Date/Report Delivery Methods			
Introduction (BST Matrix, p 1-2)	1) Revise to update documentation references 2) Revise to more accurately define the nature of the SQM and include references to the FCC and Courts of Law 3) Add a section to address implementation schedule after a Commission order		1) CLECs AGREE. CLECs do not oppose referring to wholesale services only (although this should not relieve BST from reporting retail performance to determine party CLECs do not object to referring to all FL-specific orders that created the SQM and SEEM plans and revisions 2) CLECs DISAGREE. The deletions are unnecessary and in fact, not helpful, in that they eliminate useful background information regarding the nature of the SQM. The proposed additions, in addition to the deletions, do not "more accurately define the nature of the SQM", because the SQM does reflect previous FPSC Orders and is not based on a future FPSC order. Furthermore, references to the FCC and Courts of Law are not necessary, because any changes would derive from FPSC orders, as stated in the existing language 3) CLECs DISAGREE. The proposed language of the second sentence, pertaining to change of law provisions, is inaccurate and unnecessary, in that it suggests that BellSouth may cease reporting data or paying remedies if BellSouth is no longer required "to provide any UNE or UNE combination pursuant to Section 251 of the Act". This Commission's jurisdiction over the SEEM plan is based on Florida statutes designed to ensure "the development of fair and effective competition" (F S A §364 01(3)) and to preclude anticompetitive behavior (F S A §364 01(4)(g)). Order No. PSC-01-1819-FOF-TP, FPSC Docket No. 000121-TP, issued September 10, 2001, at p. 8. In addition to discouraging anti-

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			competitive behavior and encouraging fair and effective competition, in BellSouth's own words, "the purpose of the enforcement provisions of the [SEEM] plan is to prevent 'backsliding' after BellSouth obtains authority to provide interLATA service." BellSouth Telecommunications, Inc. Brief of the Evidence, FPSC Docket 000121-TP, filed May 31, 2001, p. 1 The FCC Order granting 271 authority in Georgia and Louisiana expressly states that the performance plan is intended to ensure that a BOC meets its <u>271</u> obligations "In prior Orders, the [Federal Communications] Commission has explained that one factor it may consider as part of its public interest analysis is whether a <u>BOC</u> would have <u>adequate incentive</u> to continue to satisfy the <u>requirements of Section 271</u> 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 that the existence of the satisfactory performance monitoring and enforcement mechanisms is probative evidence that the BOC will continue to meet its <u>271 obligations</u> after grant of such authority." <i>In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc. And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana</i>, CC Docket No. 02-35, Memorandum Opinion and Order, 17 FCC Rcd 9018, 9181082, ¶ 291 (2002) (emphasis added) Because the SEEM Plan is intended to enforce BellSouth's 271 obligations following the grant of 271 authority, continuing obligations under 271 should be included in the Plan until the FCC forbears from enforcing the specific obligation under 47 U.S.C. § 160

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Report Publication Dates (BST Matrix p 2)	1) Clarify existing process 2) Remove SEEM requirements 3) Reference SEEM Admin Plan		1) CLECs AGREE. CLECs do not oppose adding next business day language 2) CLECs DISAGREE. CLECs want to ensure that language on when reports are late and when remedies are paid is retained. This should not be subject to change unless CLECs agree and Commission orders consensus. Therefore, any change to location of this information should not be in document where BST's unilateral changes may be missed in compliance filings. CLECs agree that language should not conflict with administrative plan 3) CLECs AGREE. So long as all raw data used for metrics, including excluded data, are contained on Supporting Data Files and SDUM is complete information to interpret the files
Report Delivery Methods (BST Matrix p 2)	Updated and word clarification		CLECs AGREE. CLECs do not oppose changes
SQM – ALL Measures			
SQM Disagg (BST Matrix p 1)	Delete line sharing in SQM/SEEM disagg		CLECs DISAGREE. Line sharing is a checklist item 4 loop transmission facility, which BellSouth is obligated to provide pursuant to 47 U.S.C. § 271 <i>et seq.</i> The Commission's jurisdiction over the SEEM Plan is based on Florida statutes designed to ensure "the development of fair and effective competition" ((F.S.A. § 364.01(3)) and to preclude anticompetitive behavior (F.S.A. § 364.01(4)(g)). Order No. PSC-01-1819-FOF-TP, FPSC Docket No. 000121-TP, issued September 10, 2001, at p. 8. In addition to discouraging anti-competitive behavior and encouraging fair and effective competition, in BellSouth's own words, "the purpose of the enforcement provisions of the [SEEM] plan is to prevent 'backsliding' after BellSouth obtains authority to provide interLATA service." BellSouth Telecommunications, Inc. Brief of the Evidence,

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			FPSC Docket 000121-TP, filed May 31, 2001, p. 1 The FCC Order granting 271 authority in Georgia and Louisiana expressly states that the performance plan is intended to ensure that a BOC meets its 271 obligations In prior Orders, the [Federal Communications] Commission has explained that one factor it may consider as part of its public interest analysis is whether a BOC would have adequate incentive to continue to satisfy the <u>requirements of Section 271</u> 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 that the existence of the satisfactory performance monitoring and enforcement mechanisms is probative evidence that the BOC will continue to meet its <u>271 obligations</u> after grant of such authority <i>In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc. And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana</i>, CC Docket No. 02-35, Memorandum Opinion and Order, 17 FCC Rcd 9018, 9181082, ¶ 291 (2002) (emphasis added) Because the SEEM Plan is intended to enforce BellSouth's 271 obligations following grant of 271 authority, continuing obligations under 271 (like line sharing) should be included in the Plan until the FCC forbears from enforcing the specific obligation under 47 U.S.C. § 160
Data Retained (BST Matrix p. 1)	Delete Data Retained section -replace with sentence in the SQM referring to SDUM		CLECs AGREE. CLECs do not oppose so long as SDUM attached to files is current and up to date as promised
SEEM Disagg (BST Matrix p. 1)	Delete entire SEEM Disagg section -replace with "note" in the introduction reference to the SEEM plan		CLECs DISAGREE. It is easier to understand metric results when you are able to make side-by-side comparisons of the SQM and SEEM

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Title	Change title to every measure - add acronym to every measure - delete existing numbering scheme	New Comment	disaggregations for each product If SQM and SEEM disaggregations are the same, then they only need to be listed once If the disaggregations are different, then they should be listed separately CLECs AGREE IN PART AND DISAGREE IN PART. While CLECs do not oppose the addition of acronyms to the titles, we strongly DISAGREE with the arbitrary removal of the numbering scheme in the current SQM
P-11	Move measure from Provisioning to Ordering section of SQM	New Comment	Customer-affecting problems from SOA errors are more in line with the provisioning errors Thus, CLECs cannot support moving this measure from Provisioning to Ordering
Pre-Ordering			
OSS-1 (BST matrix, p 3)	-Delete Measure -Modified OSS-2 to monitor degraded service that would have been captured in this measure		CLECs DISAGREE. This is not a redundant measure All other Bell Operating Company plans have both a measure of system availability and of query response times CLECs are due parity in query response times OSS-1 would not pick up if CSR retrieval is consistently slower for CLEC than for BST and this is the normal function, not some special degradation from an interface malfunction CLECs rely heavily on efficient query responses, since many of these queries are done while the customer is waiting on the line Slow response times can anger customers when several multi-second transactions are combined
OSS-2 (BST matrix, p 3-5) (CLEC Response, Appendix B)	-Title: Modified Title -Definition: Wording clarification -Exclusions 1) Remove exclusions for degraded service, 2) Remove exclusion for Scheduled OSS Maintenance -Business Rules: 1) Wording clarifications,	-Disagg: Modify Appendix C to include Batch Scheduler, EXACT, SOEG, LMU, and LQS as OSS Interface types	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section. Definition: CLECs AGREE. CLECs agree with the caveat that scheduled availability only excludes set maintenance window Exclusions: CLECs AGREE IN PART. Agree not to exclude degraded service but would like to keep scheduled maintenance as only time of day exclusion

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	2) Added language to define degraded service, 3) Delete note on hours of schedule maintenance -Calculation: 1) Clarify full outage calculation, 2) Added total outage calculation -Report Structure: Wording modifications -Disagg: 1) Added Total Outage, 2) Modified Appendix D -Standard: Added Total Outage as a diagnostic measure -SEEM: No changes		exclusion Business Rules: CLECs DISAGREE. CLECs believe full outages and degraded service impairments should be part of remedied metric Total outages should be the remedied calculation CLECs want to keep language and have a say on when maintenance should be scheduled to keep from impeding their business plans CLECs would not oppose a definition, agreed to in change control, of what degraded service is to merit inclusion Calculation: CLECs AGREE. CLECs agreement is contingent upon Total Outages being the remedied calculation Report Structure: CLECs AGREE. So long as all interfaces used by CLECs continue to be covered, the change is acceptable Disagg: CLECs AGREE IN PART AND DISAGREE IN PART. 1) CLECs AGREE. BST may disaggregate full outages separately from total outages 2) CLECs DISAGREE. PSIMS should be included or alternatively, BST should confirm what system replaced PSIMS Are COG and DOM still functioning or has SGG replaced these systems? Appendix C should be modified to include Batch Scheduler, EXACT, SOEG, LMU, and LQS as OSS Interface types Standard: CLECs DISAGREE. 99.5% standard should apply to total outage, not full outages only SEEM: No Changes
OSS-3 (BST matrix, p 5-8)	-Title: Modified Title -Definition: Wording clarification -Exclusions: Remove exclusion for degraded service -Business Rules: 1) Wording clarifications,		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. CLECs agree so long as scheduled availability only excludes set maintenance window Exclusions: CLECs AGREE.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	2) Added language to define degraded service -Calculation; 1) Clarify full outage calculation, 2) Added total outage calculation -Report Structure; Wording modifications -Disagg: 1) Added Total Outage, 2) Modified Appendix D -Standard: Added Total Outage as a diagnostic measure -SEEM: No changes		Business Rules: CLECs DISAGREE. CLECs believe full outages and degraded service impairments should be part of remedied metric Total outages should be part of the remedied calculation CLECs want to keep language and have a say on when maintenance should be scheduled to keep from impeding their business plans CLECs would not oppose a definition, agreed to in change control, of what degraded service is to merit inclusion CLECs request further discussions with BST on definition of "degraded service" CLECs are not quite sure about the origin of BST's definition of "degraded service" Calculation: CLECs AGREE. CLECs agreement is contingent on total outages being the remedied calculation Report Structure: CLECs AGREE. So long as all interfaces used by CLECs continue to be covered, the change is acceptable Disagg: CLECs AGREE. BST may disaggregate full outages separately from total outages Standard: CLECs DISAGREE. 99.5% standard should apply to total outages not full outages only SEEM: No Changes
OSS-4 (BST matrix, p 9)	-Delete Measure. Modified OSS-3 to monitor degraded service that would have been captured in this measure		CLECs DISAGREE. CLECs need to monitor whether responses are slower than BST's, thus requiring more personnel, resources and time to handle maintenance transactions Degraded service does not indicate whether parity in response times does not exist Other Bell Operating Company plans contain both a query response time and system availability metric
PO-1 (BST matrix, p 9)	-Delete Measure (low volume and low impact)		CLECs DISAGREE. CLECs need to have manual loop validation handled quickly Low volumes are due to the uncertain future of certain data access products CLECs need to analyze BST's data regarding volume CLECs request that BST confirm

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
PO-2 (BST matrix, p 9-11)	-Title: Modified title -Definition: Remove capturing of average interval It's a redundant way of stating performance—percent of response returned is used for monitoring performance -Exclusions: Added exclusions for Scheduled OSS Maintenance and Test Transactions/Records -Business Rules: Wording clarifications -Calculations: Delete calculation for average interval -Report Structure: 1) Delete regional report, 2) Delete irrelevant report buckets -Disagg: Wording Clarification -Standard: No changes -SEEM: No changes		under what conditions a CLEC must request manual loop makeup Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. CLECs accept deletion of average interval BST should, however, be able to produce data on averages and dispersions to review the benchmark for this measure as may be requested in six-month reviews Exclusions: CLECs AGREE. New exclusions are acceptable so long as test transactions do not include orders for live customers even if they are the first transactions for a new product Business Rules: CLECs AGREE. CLECs accept use of generic terms as long as all types of interfaces/gateways used by CLECs for this activity are covered Calculation: CLECs AGREE. CLECs do not oppose eliminating average interval metric But BST must be willing to provide data needed to evaluate benchmarks in future six-month review Report Structure: CLECs AGREE. CLECs do not oppose elimination of disaggregations Disagg: CLECs AGREE. Standard: No Change SEEM: No Change
Bulk Migration Response Time (BST matrix, p 11-12)	-New Measure -Captures response time for bulk migration orders -Not proposed to be added as a Tier 1 or Tier 2 measure		CLECs AGREE. CLECs support adding a metric that measures bulk migration response times The details of metric need to be reviewed and compared to CLEC proposals for bulk hot cuts in collaborative meetings CLECs DISAGREE. CLECs oppose omitting a benchmark and inclusion in the SEEM plan CLEC NOTE The timing and need for this measure should be discussed at the Sep 2 workshop

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Ordering			
O-1 (BST matrix, p 13)	-Delete Measure. -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		CLECs DISAGREE. This is the first warning that orders are not being processed. MCI, for one, had lots of orders lost in system in September 2003 after BST made some software changes. The remedies generated caused BST to promptly fix the problems so MCI was not stalled into the next month in getting orders through the system. This metric is critical to catching systems' problems before they lead to thousands of angry customers that may switch back to BST
O-2 (BST matrix, p 13-14)	-Title: Modified title -Definition: Wording clarification -Exclusions: Added exclusion for Test Transactions/Records -Business Rules: Wording clarification and deletion of irrelevant note -Calculation: Wording clarification -Report Structure: Deletion of irrelevant note -Disagg: Combined interfaces types (EDI and TAG) -Standard: Revised benchmark from 99.9% to 99.5% -SEEM: Remove from Tier 1		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. CLECs agree to exclusions so long as test transactions are never defined as those involving live customers Business Rules: CLECs AGREE. CLECs do not oppose use of general interface language so long as all systems used are covered. Removal of note is accepted Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. So long as CLEC's gateway is covered in metric Standard: CLECs DISAGREE. CLECs oppose weakening of benchmark on this metric. System likely will start missing many when it begins to fail, making slight change proposed by BST irrelevant SEEM: CLECs DISAGREE. CLECs see no reason to eliminate Tier 1 remedies as the loss of orders at this initial state creates burdens for CLECs and potential problems meeting customer requirements for service delivery

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
O-3 (BST matrix, p 14-17) (CLEC Response, Appendix B)	-Title: Modified title -Definition: Wording clarification -Exclusions: 1) Remove exclusion for Scheduled OSS Maintenance, 2) Add exclusions for Test Transactions/Records and LSRs that receive a Z status -Business Rules: 1) Wording clarifications, 2) Removed categories for manual fallout and make categories available on PMAP website, 3) Remove flow-through matrix and provided PMAP website where it can be found -Calculation: Remove Achieved Flow-through calculation Not used to measure performance -Report Structure: Add CLEC Specific report (0-4 combined into this measure) -Disagg: 1) Roll-up Res and Bus into Resale, 2) Roll-up UNE-L and UNE-P into UNE -Standard: 1) Delete Res benchmark of 95% and Business benchmark of 90% Both rolled-up into Resale with 90% benchmark, 2) Delete UNE-L benchmark of 85% and UNE-P benchmark of 90% Both rolled-up into UNE with a benchmark of 85% -SEEM: No changes -MISC: Note provided to explain availability of flow-through error analysis and CLEC LSR information	-Disagg: Add UNE-L with LNP as a level of disagg Standard: 1) Increase benchmark for UNE-L from 85% to 95%, 2) Increase benchmark for LNP from 85% to 95%, 3) Add benchmark of 95% to UNE-L with LNP SEEM: Add UNE-L with LNP to SEEM Tier 2	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. CLECs believe these exclusions are acceptable so long as test orders are not defined as involving live customers and BST provides more information on how Z designation gets applied and how CLECs can verify proper use of this exclusion Business Rules: CLECs AGREE. CLECs do not oppose clarifications and wording change and reference to web site CLECs expect list to expand and not retract from current flow through capabilities, so list is not to be shortened from levels defined currently in metric Calculation: CLECs DISAGREE. CLECs believe view of total ordering that flows through is critical It is not enough only to see percentage rates for orders designed to flow through CLECs and the PSC need to monitor whether BST is being responsive to adding products and features CLECs most order to flow through eligibility list Report Structure: CLECs AGREE. CLECs do not oppose adding CLEC-specific and aggregate results in the same metric so long as achieved disaggregation is retained CLECs request that BST provide examples of how the reports will differ, if at all, before we close this issue Disagg: CLECs DISAGREE. CLECs oppose collapsing disaggregations and urge adoption of their proposed addition to better monitor UNE-L with LNP flow through UNE-P flow-through could mask problems with UNE-L flow-through if combined, because of current volume differences Standard: CLECs DISAGREE. CLECs do not believe existing standards are appropriate, particularly under BST's proposal to collapse disaggregations

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			SEEM: CLECs DISAGREE . CLECs oppose losing the deleted disaggregations in SEEM as problems with flow through for certain problems would go hidden and un-remedied if combined with a large-volume product with high flow- through rates
O-4 (BST matrix, p 17)	-Delete Measure. -Data will be captured in proposed modifications to O-3		CLECs AGREE . CLECs do not oppose deleting this measure, so long as information captured here becomes part of O-3 with no change in SEEM classifications
Flow-Through Error Analysis (BST matrix, p 17)	-Delete Measure (not a measure) -Will post error analysis with the flow-through report and add information for obtaining error analysis in a footnote to O-3		CLECs AGREE . CLECs do not oppose this being a web posting instead of being part of the SQM
O-6 (BST matrix, p 17)	-Delete Measure. -BST will provide website where CLEC LSR info can be found for CLECs who elect to subscribe for info Add footnote to O-3 describing how to obtain CLEC LSR info		CLECs AGREE . CLECs do not oppose having to subscribe to this information so long as notice is given before PMAP reporting ends and subscription must start and all data remains identical to prior format
O-7 (BST matrix, p 17) (CLEC Response, Appendix B)	-Delete Measure. -Info can be ascertained by reviewing data from Reject Interval	Exclusions: Modify project exclusion so batch hot cuts will not be excluded	CLECs DISAGREE . This measure allows CLECs the ability to measure reject intervals It is imperative that CLECs are able to see how many of their orders are being rejected by BST CLECs have also proposed an additional disaggregation to see if batch hot cut orders get rejected BST rejection errors have been a problem for at least one CLEC in the coalition Specifically, ITC^DeltaCom has been receiving invalid rejects and clarifications These are costly and require re-processing and delay customer service delivery A list of these invalid rejects/clarifications has been sent to BellSouth for investigation and a call is scheduled weekly or as needed CLECs need this measure to remain until this situation is resolved
O-8 (BST matrix, p 18-22)	-Title: Modified title -Definition: Wording clarification	Exclusions: Modify project exclusion so batch hot cuts will not be excluded	Title: CLECs DISAGREE . See CLEC comment under SQM-All Measures section Definition: CLECs AGREE . CLECs do no oppose

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(CLEC Response, Appendix B)	-Exclusions: 1) Remove exclusion for Center specific hours, 2) Modified project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations will not be excluded, 3) Add exclusions for Scheduled OSS/Maintenance and Test Transactions/Records -Business Rules: 1) Wordng Clarifications, 2) Provided web address for hours of operations, 3) Added note to reflect the Bulk Migration process -Calculation: Delete Average Reject Interval Calculation, not used to state performance -Report Structure: Delete interval buckets not relevant to standard---can be obtained from raw data -Disagg: Delete product disagg ---little to no volume for many products Product level can be obtained from raw data Standard: 1) Revise Partially Mech benchmark from 95%<=10 hours to 90%<=10 hours, 2) Revise Non-Mech benchmark from 95%<=24 hours to 85%<=18 hours, 3) Revise LIT from 95%<=36 hours to 85%<=4 days -Benchmarks revised in attempt to regionalize benchmarks for all BST states -SEEM: Remove from Tier 1 and Tier 2		discussing issues removed from definition in business rules Exclusions: CLECs AGREE. CLECs agree this measure should cover batch hot cuts CLECs will also accept additional exclusions so long as test orders are not defined as those involving live customers CLECs are unclear on how BST intends to account for non-business hours This requires further discussion In the Exclusion that begins "LSRs identified as "Projects" , the wording needs to be changed from "UNE- P" to "UNE-L" only Business Rules: CLECs AGREE. CLECs do not oppose changes except for indication that business hours apply to fully-mechanized orders Only schedule system down time should be applied here Any web posting should not expand scheduled down time from current hours without CLEC acceptance Calculation: CLECs AGREE. CLECs do not oppose eliminating average interval so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks Report Structure: CLECs AGREE. CLECs do not oppose elimination of dispersion buckets so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks Disagg: CLECs DISAGREE. CLECs may agree to combine some products, (e g INP and LNP), but not to eliminate all disaggregations as doing so would mask differences in performance Standard: CLECs DISAGREE. CLECs do not see reason to lessen benchmarks particularly since BST's were less stringent than many other Bell companies SEEM: CLECs DISAGREE. CLECs see no reason why long reject intervals that can lead to delays in getting an order accepted and moved toward timely provisioning should be eliminated

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
O-9 (BST matrix, p 22-28) (CLEC Response, Appendix B)	-Title: Modified title -Definition: Wordng clarifications -Exclusions: 1) Remove exclusion for Center specific hours, 2) Modified project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations will not be excluded, 3) Add exclusions for Scheduled OSS/Maintenance and Test Transactions/Records -Business Rules: 1) Wordng Clarifications, 2) Provided web address for hours of operations, 3) Added note to reflect the Bulk Migration process -Calculation: Delete of Average FOC Interval calculation, not used to state performance -Report Structure: Delete interval buckets---can be obtained from raw data -Disagg: Delete product disagg ---little to no volume for many products Product level can be obtained from raw data -Standard: 1) Revise Partially Mech benchmark from 95%<=10 hours to 90%<=10 hours, 2) Revise Non-Mech benchmark from 95%<=24 hours to 90%<=24 hours, 3) Revise LIT from 95%<=48 hours to 95%<=10 days -Benchmarks revised in attempt to regionalize benchmarks for all BST states -SEEM: Remove from Tier 1 and Tier 2	Exclusions: Modify project exclusion so that LNP (standalone) and batch hot cuts will not be excluded Disagg: Add LNP Standalone (Projects) as a level of disagg Standard: Add benchmarks for LNP Standalone (Projects) -- 95% within 24 hours (1-10 numbers), 95% within 48 hours (11-999 numbers) SEEM: Include new LNP Standalone disagg in SEEM Tier 1 and Tier 2	from the remedy plan Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. CLECs oppose taking out facilities check provision BST has not provided any reason to overturn this part of the PSC's original order and reconsideration decision to retain it CLECs were even open to considering impact on intervals in past but no evidence was provided by BST The facilities check ensures that meeting FOC timeliness does not mean that BST may provide any due date on the first FOC whether it knows if it can live up to it or not Exclusions: CLECs AGREE IN PART. CLECs agree this measure should cover batch hot cuts CLECs also accept additional exclusions so long as test orders are not defined as those involving live customers CLECs are unclear on how BST intends to account for non-business hours This requires further discussion In the Exclusion that begins "LSRs identified as "Projects", the wording needs to be changed from "UNE-P" to "UNE-L" only Business Rules: CLECs AGREE. CLECs do not oppose changes except for indication that business hours apply to fully mechanized orders Only schedule system down time should be applied here Any web posting should not expand scheduled down time from current hours without CLEC acceptance Calculation: CLECs AGREE. CLECs do not oppose eliminating average interval so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks Report Structure: CLECs AGREE. CLECs do not oppose elimination of dispersion buckets so long as BST will provide interval information at six month reviews as needed to evaluate benchmarks Disagg: CLECs DISAGREE. CLECs may agree to collapsing some but not all product categories as

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			doing so would mask differences in performance Standard: CLECs DISAGREE. CLECs do not see reason to lessen benchmarks particularly since BST's were less stringent than many other Bell companies SEEM: CLECs DISAGREE. CLECs see no reason why long FOC intervals that can keep CLEC from informing customers of due dates should be eliminated from the remedy plan
O-10 (BST matrix, p 29)	-Delete Measure. -This measure captures an extremely small number of orders and the interval for this measure is captured in O-9		CLECs AGREE.
O-11 (BST matrix, p 29-31) (CLEC Response, Appendix B)	-Title: Modified title -Definition: Wording clarification -Exclusions: 1) Modified project exclusion so that valid project IDs for LSRs that are identified as Bulk Migrations will not be excluded, 2) Add exclusion for Test Transactions/Records -Business Rules: 1) Wording Clarifications, 2) Added note to reflect the Bulk Migration process -Calculation: No changes -Report Structure: 1) Wording clarifications, 2) Delete regional report -Disagg Delete product disagg ---little to no volume for many products Product level can be obtained from raw data -Standard: No changes -SEEM: Remove from Tier 1	Exclusions: Modify project exclusion so batch hot cuts will not be excluded	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. Business Rules: CLECs AGREE. CLECs do not oppose changes or additions for bulk hot cuts, but would like explanation of assignment to disaggregation category Calculation: No Changes Report Structure: CLECs AGREE. Disagg: CLECs DISAGREE. CLECs may agree to combine some categories but not all as doing so would mask differences in performance. Standard: No Changes SEEM: CLECs DISAGREE. CLECs oppose removal of Tier I remedies BST has not explained why missing FOCs and Rejects do not harm their individual relationships with customers
O-12	-Delete Measure		CLECs DISAGREE. CLECs do not believe this

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p 32)	-Timeliness of answer in the LCSC is not directly affecting CLECs ability to provide service Orders are not placed by phone, CLEC is calling to get info		metric is unnecessary Long hold times can burden staff serving customers and delay resolution of customer-affecting problems
P-11 (BST matrix, p 32-35)	-Title: Modified title (Move measure from Provisioning to Ordering) -Definition: Wording clarifications -Exclusions: 1) Remove exclusion for CLEC LSRs submitted manually, 2) Add exclusion for LSRs identified as projects -Business Rules: Wording clarifications -Calculation: Wording Clarification -Disagg: No changes -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. This measure should remain in the Provisioning section of the SQM See also CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. Customer-affecting problems from SOA errors are more in line with the provisioning errors Exclusions: CLECs DISAGREE. CLECs disagree on the exclusion of project orders, as these are typically large and very customer-impacting CLECs also disagree to excluding LCSC/System workarounds All elements should be compared to the CLEC's requested service order LSRs coded as projects, particularly those for batch hot cuts should not be excluded from determining if the order was provisioned as requested by the CLEC CLECs want to ensure that listing orders are part of what is being measured CLECs request that BST confirm that test orders are not defined as orders involving live customers Business Rules: CLECs DISAGREE. CLECs want to add "considered" to read " workarounds which will not be "considered" service affecting " in the first sentence of 2nd paragraph under BST LSR Fields Calculation: CLECs DISAGREE. CLECs may agree if deletion of the word applicable does not expand the denominator of LSRs beyond those subject to the automatic checking of accuracy Report Structure: CLECs AGREE. Disagg: No changes Standard: No changes SEEM: No changes

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	Provisioning	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
P-1 (BST matrix, p 36)	-Delete Measure -Orders captured in this measure would be included in the proposed FOCI and proposed PIAM measures -Transaction volumes are too small to be useful to evaluate performance		Retain Existing SQM Tool to evaluate services which are experiencing delays CLECs order tracking systems are better equipped to monitor and validate this measure as opposed to the FOCI & PIAM	CLECs DISAGREE . This measure should remain in the SQM. It serves as a tool to evaluate services that are experiencing delays. BST's order tracking systems for CLECs are better equipped to monitor and validate this measure as opposed to the FOCI and PIAM measures.
P-2A (BST matrix, p 36)	-Delete Measure -Performance for Jeopardy has not been a problem -The interval captured in this measure is included in the proposed FOCI			CLECs DISAGREE. Having orders placed in jeopardy is a critical concern to CLECs for many reasons, not the least of which is that it directly impacts customer satisfaction. During the 6-month review in LA, Staff pointed out that just because BST does not provide jeopardy notices to its retail end users, does not mean that they should not give jeopardy notices to its wholesale customers. Since BST provides jeopardy notices to itself, it must provide jeopardy notices to the CLECs. So whether BST gives jeopardy notices to its retail customers has no bearing on their obligation to provide wholesale customers with jeopardy notices. In addition, as facilities-based competition increases, the number of jeopardies may also increase. It should cause BellSouth no harm to continue reporting this measure since the mechanisms are already in place to track and capture this data. The CLECs cannot support the deletion of this measure.
P-2B (BST matrix, p 37)	-Delete Measure -Minimal impact on CLECs			CLECs DISAGREE . Clearly, the % of orders given jeopardy notices, when compared to retail, is very important to CLECs. BST is attempting to make changes that are burdensome to the CLECs and that prohibit CLECs from having a clear comparison of service.
P-3 (BST matrix, p 37-40)	-Title: Modified title (from % missed to % met) -Definition: Changed to reflect percent of installation appointments met			Title: CLECs DISAGREE. Modifying the title of this measure from "missed", which clearly points out the intent of the measure, to "met" is not a fair

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Exclusions: Removed Exclusion for End User Misses -Business Rules Changed to reflect percent of installation appointments met -Calculation: Changed to reflect percent of installation appointments met -Report Structure: 1) Changed to eliminate categories with little to no volume, 2) Delete regional report -Disagg: Remove products with low volume -Standard: parity (see disagg changes) -SEEM: No changes		representation of the real issue at hand -- the number of installation appts BST misses The CLECs' tracking systems were established for the purpose of tracking misses from the customer's point of view BST's reasons for missing the appt should be clearly noted Also, see CLEC comment under SQM - All Measures Definition: CLECs DISAGREE. CLECs do not support changing the measure from missed to met Exclusions: CLECs DISAGREE. Currently, technicians remove inside wire/jacks or report misses when their allotted time cannot be met Excluding test orders is questionable since the determination of these orders is not defined BST is attempting to re-define "Cancelled Service Orders " Previously, only service orders cancelled before the due date were allowed to be excluded, but now BST wants to exclude ALL cancelled service orders regardless of when they were cancelled Business Rules: CLECs DISAGREE. BellSouth has limited this measure to capture only the first missed appointment reason code entered on a service order This limits the measure's effectiveness because missed appointment codes are used every time a service order's due date is changed So for example, if CLECs supplement an order for a new due date, BST will apply a subscriber-missed appointment code and that service order will be excluded from this measurement CLECs believe that ANY BellSouth missed appointment code should be counted as a BellSouth miss - regardless of whether the order had a previous subscriber-missed appointment Just because a due date was missed shouldn't give BellSouth carte blanche to miss future install dates SBC's Missed Appointment measure counts any SBC missed reason and so should BST's Calculation: CLECs DISAGREE. Report Structure: CLECs DISAGREE. BST appears to be removing categories where there

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			performance has typically been problematic Disagg: CLECs DISAGREE. BST appears to be removing product disaggregations where there performance has typically been problematic Standard: CLECs DISAGREE. SEEM: No Changes
FOCI- FOC Average Completion Interval (BST matrix, p 40-44)	-New measure -Combines intervals to return a FOC and to complete a service order into a single interval measure -Added to SEEM Tier 1 and Tier 2		CLECs DISAGREE. While CLECs requested a measure of this type, this measure, as constructed, is absolutely inappropriate and completely and unequivocally rejected by the CLECs. The artificial padding of intervals that include ILEC "FOC" times render this measure completely useless for monitoring for discrimination. Further, the information reported by this measure is misleading because it reports service intervals for ILEC customers that never occurred. This measure, although in place in Georgia, at least has no SEEM impact in that state and so the effect of its harmful data is somewhat mitigated. However, BST has the audacity to propose that this farce of a metric be the basis for its penalty payments for both FOC and OCI in Florida
P-4 (BST matrix, p 44) (CLEC Response, Appendix B)	-Delete Measure -This info is now included in the proposed FOCI measure	Disagg: Add disagg for batch hot cuts Standard: Batch Hot Cuts 98% in 5 days	CLECs DISAGREE. This is a key measure and one where CLECs currently track BST's performance. BST's proposed changes will mask the party comparison
P-5 (BST matrix, p 45)	-Delete Measure -CLECs can check order status in CSOTS. This is party measure, but actually better service than that provided to retail because retail does not get a notification that a service order is complete		CLECs DISAGREE. Real-time CSOTS does not exist. BST's current systems clearly status the life of an order, as well as, clearly indicate completion and error status following completion of the order
P-6 (BST matrix, p 45)	-Delete Measure -Another measure of FOC Timeliness which is already measured in FOCT and proposed FOCI		CLECs DISAGREE. A CLEC's credibility to its customer depends on its accuracy in scheduling appointments. If CLECs are unable to notify their customers and arrange for access to a customer's

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
P-7 (BST matrix, p 45-47) (CLEC Response, Appendix B)	-Title: Modified title -Definition: Wording clarification to include time to notify CLEC after hot cut is complete -Exclusions: 1) Remove exclusion for Unbundled Loops where there is no existing subscriber loop, 2) Add exclusion for non-coordinated conversions, 3) Add exclusion for BellSouth or CLEC internal or administrative orders, 4) Add exclusion for listing orders -Business Rules: Revised to reflect start and stop times which includes CLEC notification time Calculation: Revised to include CLEC notification time -Report Structure: 1) Delete unnecessary interval buckets 2) Delete regional report -Disagg Roll-up INP and LNP loops into one disagg category CCC (loops) -Standard: Revise benchmark of 95%≤15 minutes to 95%≤20 minutes to account for adding CLEC notification time to the interval -SEEM: No changes	Title: Include Non-Coordinated Conversions in this measure Business Rules: Stop time is notification to the CLEC that the cut is complete Calculation: Include Non-Coordinated Conversions Disagg: Add additional migration types (See CLEC Comments p 5) Standard: Revise benchmark of 95% ≤ 15 minutes to 95% ≤ 10 minutes	premises, the customer may be lost to a win-back Title: CLECs DISAGREE Non-Coordinated Conversions should be included in this measure See CLEC comment under SQM-All Measures section Definition: CLECs AGREE Exclusions: CLECs DISAGREE Non-Coordinated Conversions should be included in this measure Business Rules: CLECs DISAGREE The Start Time should be when the loop is actually disconnected The Stop Time is notification to CLECs that the cut is complete Calculation: CLECs DISAGREE Include Non-Coordinated Conversions Report Structure: CLECs DISAGREE Interval breaks out points to those areas for concern Disagg: CLECs DISAGREE Add additional migration types (See CLEC Comments p 5) Standard: CLECs DISAGREE Revise benchmark of 95% in less than or equal to 15 minutes to 95% in less than or equal to 10 minutes SEEM: No changes.
P-7A (BST matrix, p 47-50) (CLEC Response p 5 and Appendix B)	-Title: Delete reference to average interval in title Average interval not used to evaluate performance -Definition: Wording clarification -Exclusions: 1) Remove exclusion for test orders, 2) Add exclusion for BellSouth or CLEC internal or administrative orders, 3) Add exclusion for listing orders -Business Rules: Modified to identify intervals for IDLC and non-IDLC loops -Calculation: Delete calculations for interval and average interval, not	Disagg: Add additional migration types Business Rules: define criteria for test order exclusions	Title: CLECs DISAGREE See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE.. Need to define criteria for test order exclusions Business Rules: CLECs DISAGREE Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE IN PART AND DISAGREE IN PART Need to add additional

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	used to evaluate performance -Report Structure: 1) Remove requirement to report results in three separate distributions, 2) Delete regional report, 3) Delete unnecessary interval buckets -Disagg: 1) Delete SL1 and SL2 time and non-time specific 2) New disagg of Non-IDLC and IDLC -Standard: Benchmark for IDLC 95% within + or -2 hours of scheduled start time -SEEM: No changes		migration types, e.g. EELS, and hot cuts away from loops and EELs to UNE-P and resale CLECs will support collapsing SL1 and SL2 Standard: CLECs AGREE. SEEM: No Change
P-7B (BST matrix, p 50-51) (CLEC Response p 5 and Appendix B)	-Title: Modified Title -Definition: Wording clarification (simplified) -Exclusions: 1) Wording Clarification, 2) Remove exclusion for test orders, 3) Add exclusion for BellSouth or CLEC internal or administrative orders, 4) Add exclusion for listing orders -Business Rules: 1) Wording clarification, 2) Add language to capture the overall percentage of orders -Calculation: 1) Wording clarification, 2) Add calculation for overall percentage -Report Structure: Delete regional report -Disagg: Roll-up INP and LNP loops to CCC (loops) -Standard: Remove benchmark of <=5 hours and make diagnostic for CCC (loops) -SEEM: No changes	-Title: Include Non-Coordinated Customer Conversions in this measure -Definition: Include Non-Coordinated Customer Conversions -Exclusions: Add exclusion for test orders -Business Rules: Include Non-Coordinated Customer Conversions Disagg: Add additional migration types – Standard: Revise benchmark of <= 5 hours to <= 2 hours -SEEM: Add to SEEM Tier 1 and Tier 2	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. Add non-coordinated Exclusions: CLECs DISAGREE. Add back with CLEC agreement Business Rules: CLECs DISAGREE. These changes require further discussion at Sep 2 workshop between CLECs and BST Calculation: CLECs DISAGREE. These changes require further discussion at Sep 2 workshop between CLECs and BST Report Structure: CLECs AGREE. Disagg: CLECs DISAGREE. EELs should be added as a separate disaggregation Standard: CLECs DISAGREE. Performance should improve rather than ask CLECs to accept a lower standard SEEM: No Changes
P-7C	-Title: Changed from 7 days to 5 days	-Definition: Include Non-Coordinated Customer	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Leave days "as

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p 52-53) (CLEC Response p 5 and Appendix B)	-Definition: Wording clarifications and change from 7 days to 5 days -Exclusions: 1) Wording clarifications, 2) Add exclusion for listing orders, 3) add exclusion for BellSouth or CLEC internal or administrative orders, 4) Add exclusion for troubles outside of BellSouth's control, 5) Add exclusion for disconnect orders -Business Rules: Wording clarification and change from 7 days to 5 days -Calculation: Wording clarification and change from 7 days to 5 days -Report Structure: 1) Delete dispatch/non-dispatch reports 2) Delete regional report -Disagg: Roll-up UNE loops design and non-design into UNE loops -Standard: Revise benchmark of <=3% to <=5% -SEEM Remove from SEEM Tier 1 and Tier 2	Conversions -Exclusions: Add exclusion for test orders Define troubles outside BST control -Business Rules: Include Non-Coordinated Customer Conversions Disagg: Add additional migration types Calculation: Include Non-Coordinated Customer Conversions Standard: No Change Seem No Change	IS " Definition: CLECs DISAGREE. Leave days "as is" Exclusions: CLECs DISAGREE. This issue requires further discussion at Sep 2 workshop Business Rules: CLECs DISAGREE IN PART CLECs accept other changes, but do not support change from 7 days to 5 days Calculation: CLECs DISAGREE. CLECs do not support change from 7 days to 5 days Report Structure: CLECs DISAGREE. Regional reports and those separately dispatch from non-dispatch are meaningful Disagg: CLECs DISAGREE. Loop type is a meaningful difference Add disaggregation for EELs Standard: CLECs DISAGREE. Performance should improve rather than ask CLECs to accept a lower standard (i.e., from <= 3% to <= 5%) SEEM: CLECs DISAGREE.
CNDD Non-CCC Percent Completed and Notified Due Date (BST matrix, p 53-54)	-New measure. Measures the percentage of non-coordinated conversions that BellSouth completed and provided notification to the CLECs on the due date		CLECs AGREE.
P-7D Coordinated/Non-coordinated Customer Conversions-Percent Without Service Disruption (CLEC Response, Appendix A, p 5-6)		-New Measure Measures the percentage of hot cuts that are completed without a loss of service due to BellSouth-caused service interruptions outside of the initial customer cutover	
P-8 (BST matrix, p 54)	-Delete Measure -represents a small number of orders and the customer impacting event (trouble) as captured in Percent Disconnected Troubles		CLECs DISAGREE. This measure is a key indicator of support for xDSL testing and should not be deleted It is imperative that CLECs receive

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	(trouble) is captured in Percent Provisioning Troubles		trouble-loops at installation Further, as facilities-based competition increases, so may the number of orders requiring cooperative testing It should cause BellSouth no harm to continue reporting this measure since the mechanisms are already in place to track and capture this data The CLECs cannot support the deletion of this measure
P-9 (BST matrix, p 54-56)	-Title: Changed from 30 days to 5 days -Definition: Wording clarification and change from 30 days to 5 days -Exclusions: Add exclusion for troubles outside of BellSouth's control -Business Rules: 1) Wording clarifications, 2) Removed reference to D&F orders, 3) Removed reference to Standalone LNP -Calculations: Wording clarification and change in conversion interval from 30 days to 5 days -Report Structure: 1) Delete separate volume reports (< 10 circuits and >= 10 circuits), 2) Delete dispatch/non dispatch reports, 3) Delete regional report -Disagg: 1) Remove products with low volume 2) Modified product categories so that each product is only reported once -Standard: Parity (see disagg changes) -SEEM: No changes	Define exclusion, how coded for outside BST control 30 days reflects a more complete picture of service quality Retain Disagg as the CLEC auditing systems would require changes of products for which volumes may increase in the future	Title: CLECs DISAGREE See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. 5 days is not a sufficient period of time CLECs must be able to schedule and complete their portion of the provisioning process 30 days reflects a more complete picture of service quality CLECs might agree to 20 days since it is a more accurate reflection of provisioning troubles Exclusions: CLECs DISAGREE. This exclusion is inappropriate and hard to define It also gives technicians too much discretion in the manner in which they code these troubles Further, BST is not harmed by the current process which allows a parity determination to be made Business Rules: CLECs AGREE. Calculation: CLECs DISAGREE. CLECs require further discussion of changes to calculation at Sep 2 workshop Report Structure: CLECs DISAGREE. BST has paid penalties on these disaggregations before If these categories are lumped together, it will mask BST's actual performance results Disagg: CLECs DISAGREE. Disaggregations should be retained, as CLEC auditing systems would require changes of products for which volumes are likely to increase in the near future Standard: CLECs AGREE. Parity standard is okay, however disaggregation changes are not

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			SEEM: No Changes
P-11 (BST matrix, p 57)	Revised and moved to Ordering Section.		CLECs DISAGREE . Please see CLEC comments for this measure in the Ordering section (above)
P-13B (BST matrix, p 57-58)	-Title: Wording clarification -Definition: Wording clarification -Exclusions 1) add exclusion for BellSouth or CLEC internal or administrative orders, 2) Add exclusion for listing orders, 3) Add exclusion for Scheduled OSS Maintenance -Business Rules: Wording clarifications -Calculations: Wording clarification -Report Structure: Delete regional report -Disagg: No changes -Standard: Revise benchmark from 96 5% to 95% -SEEM: Remove from SEEM Tier 1	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. Business Rules: CLECs DISAGREE. The proposed changes to the business rules require further discussion and clarification Calculation: CLECs DISAGREE. The proposed changes to the calculations require further discussion and clarification Report Structure: CLECs AGREE. Disagg: No Changes Standard: CLECs DISAGREE. Performance should improve rather than ask CLECs to accept a lower standard (i.e., from 96 5% to 95%) SEEM: CLECs DISAGREE.	
P-13C (BST matrix, p 58-59)	-Title: Wording clarification -Definition: Wording clarification -Exclusions 1) Add exclusion for Remote Call Forwarding, DID, and ISDN Data TNs, 2) Add exclusion for BellSouth or CLEC internal or administrative orders, 3) Add exclusion for zero due dated expedited orders requested by the CLEC, 4) Add exclusion for listing orders, Maintenance -Business Rules: Wording clarifications -Calculations: Wording clarification -Report Structure: Delete regional report	LNP changed to LAT?? RCF, DID, and ISDN should not be excluded	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. It is more accurate to measure the number of activations vs orders Exclusions: CLECs AGREE. Business Rules: CLECs DISAGREE. It is more accurate to measure the number of activations vs orders Calculation: CLECs DISAGREE. It is more accurate to measure the number of activations vs orders Report Structure: CLECs AGREE.

Measure/ Reference	BellSouth-Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Disagg: Remove Standalone -Standard: insert >= sign -SEEM: Remove from SEEM Tier 1		Disagg: CLECs DISAGREE. Changes to the levels of disaggregation require further discussion Standard: CLECs AGREE. SEEM: CLECs DISAGREE.
P-13D (BST matrix, p 59-60)	-Title: Wording clarification-measure is not an interval rather a percent within interval -Definition Wording clarification -Exclusions 1) Wording clarifications, 2) Remove exclusion for orders which are candidates for 10 digit triggers -Business Rules: Wording clarifications -Calculations: 1) Revise calculation to be based on number of non-triggerable orders 2) Delete interval calculation, performance is based on percentage -Report Structure: Delete regional report -Disagg: Roll-up LNP Working Hours and LNP Unscheduled After hours into LNP -Standard: Revise benchmark from 95% <= 4 hours to 95% <= 12 hours -SEEM: Remove from SEEM Tier 1		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section BellSouth is attempting to hamper the usefulness of this important measure in several ways, including, but not limited to • Changing standard from 4 hours to 12 (while at the same time retaining a non-business hour exclusion) • Changing the calculation from telephone number to service order • Removing it from Tier 1 SEEM Definition: CLECs DISAGREE. Exclusions: CLECs AGREE. Business Rules: CLECs DISAGREE. Calculation: CLECs DISAGREE. See above comment Report Structure: CLECs AGREE. Disagg: CLECs DISAGREE. Standard: CLECs DISAGREE. See above comment SEEM: CLECs DISAGREE. See above comment

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
P-14 Percent of Customer Trouble Tickets Closed Electronically (CLEC Response, Appendix A, p 3-4)		-New Measure Measures the percent of customer trouble tickets during the reporting period that are closed electronically by a BellSouth technician	
P-14 Percent of Batch Hot Cuts Started On Time (CLEC Response, Appendix A pps 7-8)		-New Measure Measures the percentage of time that BellSouth begins performing batch hot cuts within 15 minutes of the committed start time Add to SEEM Tier 1 and Tier 2	
Maintenance and Repair			
M&R-1 (BST matrix, p 61-62)	-Title: Changed title (from % missed to % met) -Definition Changed to reflect percent of repair appointments met -Exclusions 1) Add exclusion for Informational Tickets, 2) Add exclusion for Troubles Outside BellSouth's Control -Business Rules: 1) Wording clarification, 2) Remove note. -Calculations: Revise calculation to reflect percent met -Report Structure: Delete regional report -Disagg: 1) Roll-up products with low volume into another category, 2) Modify product categories so that each category is reported only once -Standard: Parity (see disagg changes) -SEEM: No changes		Title: CLECs DISAGREE. This measurement is used throughout the industry as "Missed Repair Appointments" and the BST change does not change the results, it only changes the reported values which makes comparisons to historical performance more difficult. This requested change does not seem to provide any value and would only cost BST to implement. Also, see CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. Same reason as above Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART. 1) CLECs AGREE. However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets 2) CLECs DISAGREE. The language of this exclusion is overly broad. Presumably, troubles outside of BST's control would affect CLEC lines in

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			the same manner as BST retail lines CLEC lines should still be repair at party with BST lines Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majeure clauses) Business Rules: CLECs AGREE IN PART AND DISAGREE IN PART. The clarification changes made up to the words "No Access" are acceptable However, the proposed change to "No Access" is not acceptable BST proposed change moves "No Access" tickets from an Exclusion (not counted in the measurement) to counted as a commitment met for the measurement Possible counter offer: As done in the SBC region, if a ticket is marked as "No Access" before the commit time, it is counted as a commitment met If the ticket is marked as "No Access" after the commit time, it is counted as a commitment missed Calculation: CLECs DISAGREE. See reasons above Report Structure: CLECs AGREE. Disagg: CLECs AGREE IN PART AND DISAGREE IN PART. CLECs agree to ensure each product is only reported in one disaggregation CLECs disagree with aggregating any products that are not repaired in the same manner/priority and that certain disaggregations are moved to diagnostic CLECs specifically oppose removing disaggregations for Line Sharing and Interoffice Transport as BST continues to be obligated to offer these items as UNEs under Section 271 of the Act Standard: CLECs AGREE IN PART AND DISAGREE IN PART. See Disagg above SEEM: No Changes
M&R-2 (BST matrix, p 62-64)	-Title: Modify title -Definition Wording clarification		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. CLECs agree with

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Exclusions 1) Add exclusion for Informational Tickets, 2) Add exclusion for Troubles Outside BellSouth's Control -Business Rules: Wording clarification -Calculations: Wording clarification -Report Structure: Delete regional report -Disagg: 1) Roll-up products with low volume into another category, 2) Modify product categories so that each category is reported only once -Standard: Party (see disagg changes) -SEEM: Remove from SEEM Tier 1 and Tier 2		clarification question Does the change from the word "reported" to the word "closed" change how BST reports results today or does this have an impact on the results? Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART. 1) CLECs AGREE. However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets 2) CLECs DISAGREE. The language of this exclusion is overly broad Presumably, troubles outside of BST's control would affect CLEC lines in the same manner as BST retail lines CLEC lines should still be repair at party with BST lines Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majeure clauses) Business Rules: CLECs DISAGREE. BST seems to be limiting this report to only "customer direct reports " This change is troublesome for a couple of reasons 1) CLECs report troubles to BST on our customer's behalf, so technically all CLEC trouble reports are not "customer direct reports " 2) Performance should be measured for all troubles that are worked by BST regardless if the tickets are "customer direct" or initiated by BST internally Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE IN PART AND DISAGREE IN PART. See comments from previous measurement (M&R-1) Standard: CLECs AGREE IN PART AND DISAGREE IN PART. See Disagg above SEEM: CLECs DISAGREE

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
M&R-3 (BST matrix, p 64-66)	-Title: Wording clarification -Definition Wording clarification -Exclusions 1) Add exclusion for Informational Tickets, 2) Add exclusion for Troubles Outside BellSouth's Control -Business Rules: 1) Wording clarification, 2) Add note clarifying time that has already been excluded -Calculations: No changes -Report Structure: Delete regional report -Disagg: 1) Roll-up products with low volume into another category, 2) Modify product categories so that each category is reported only once -Standard: Parity (see disagg changes) -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section. Definition: CLECs AGREE. Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART. 1) CLECs AGREE. However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets 2) CLECs DISAGREE. The language of this exclusion is overly broad Presumably, troubles outside of BST's control would affect CLEC lines in the same manner as BST retail lines CLEC lines should still be repair at parity with BST lines Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majeure clauses) Business Rules: CLECs DISAGREE. It seems that BST is attempting to change the stop timestamp for closing tickets (from the time ticket cleared in system to time trouble repaired) The current language suggests a system timestamp that can not be altered by users and the proposed language suggests a timestamp that can be entered/altered by end users CLECs would prefer the system-generated timestamp whenever possible Calculation: No Changes Report Structure: CLECs AGREE. Disagg: CLECs AGREE IN PART AND DISAGREE IN PART. See comments from previous measurement (M&R-1) Standard: CLECs AGREE IN PART AND DISAGREE IN PART. See Disagg above SEEM: No Changes

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
M&R-4 (BST matrix, p 66-68)	-Title: Wording clarification -Definition Wording clarification -Exclusions 1) Add exclusion for Informational Tickets, 2) Add exclusion for Troubles Outside BellSouth's Control -Business Rules: Wording clarification -Calculations: 1) Wording clarification to specify repeat troubles, 2) Replaced cleared date with closed date -Report Structure: Delete regional report -Disagg: 1) Roll-up products with low volume into another category, 2) Modify product categories so that each category is reported only once -Standard: Parity (see disagg changes) -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE WITH MODIFICATION. "This report measures the percentage of customer trouble reports received within thirty days of a previous <u>trouble report</u> " Exclusions: CLECs AGREE IN PART AND DISAGREE IN PART. 1) CLECs AGREE. However, scenarios for which Informational Tickets are created should be discussed to ensure troubles (like service order errors) are not being excluded by the use of Informational Tickets 2) CLECs DISAGREE. The language of this exclusion is overly broad Presumably, troubles outside of BST's control would affect CLEC lines in the same manner as BST retail lines CLEC lines should still be repair at party with BST lines Also, this exclusion may already be covered by General Terms and Conditions of the individual interconnection agreements (force majeure clauses) Business Rules: CLECs DISAGREE. CLECs would like some clarification as to why different timestamps are used for LMOS and WFA Calculation: CLECs DISAGREE. See above response for Business Rules regarding "cleared" vs "closed" timestamps Report Structure: CLECs AGREE. Disagg: CLECs AGREE IN PART AND DISAGREE IN PART. See comments from previous measurement (M&R-1) Standard: CLECs AGREE IN PART AND DISAGREE IN PART. See Disagg above SEEM: No Changes
M&R-5	-Delete Measure		CLECs DISAGREE. This measure is an important measure used throughout the industry This

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p 68)	Duplicative measure Information captured in M&R-3, since maintenance durations greater than 24 hours normally involve an out service condition		measurement is not duplicative of the MAD (M&R 3) measure as this measurement provides a firm benchmark to measure performance against The MAD (M&R 3) measure captures averaged results, which can vary significantly from benchmarked results
M&R-6 (BST matrix, p 69)	-Title: Wording clarification -Definition: No changes -Exclusions: Clarify that abandoned calls represents the "volume" of abandoned calls -Business Rules: Wording clarification noting that abandoned calls are not counted in volume but the time is included -Calculation: Wording clarification -Report Structure: No changes -Disagg: Wording clarification -Standard: No changes-parity -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: No Changes Exclusions: CLECs AGREE. Business Rules: CLECs AGREE. Calculation: CLECs AGREE WITH MODIFICATION. The total abandoned call duration needs to be added into the Average Answer Time "c = Sum of all answer times + total abandoned calls duration" and "d = Total Number of Answered Calls in the reporting period" Report Structure: No Changes Disagg: CLECs DISAGREE. CLECs would like to understand the proposed change and the effects to reported results The changes seem to be more than "Wording Clarification " Standard: No Changes SEEM: No Changes
M&R-7 (BST matrix, p 70)	-Delete Measure -Few CLECs want this process anymore BellSouth will continue to offer this service to any customer who asks for their name to be put on the E-Mail list, but the measurement of this process is not necessary		DISAGREE: This measurement has some interplay with some of the other BST proposed changes Specifically, BST is trying to add an exclusion to every measurement for "Troubles outside BST's control " BST includes examples of cable cuts as rationale for this added exclusion for which BST should not be held responsible In this measurement (and contrary to BST's previously mentioned rationale), BST claims that network outages (like cable cuts) would still be covered by other measurements

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
B-1 (BST matrix, p 70-71)	-Title: Wording clarification -Definition: Wording clarification -Exclusions: Wording clarification -Business Rules: Wording clarification -Calculation: Delete calculation for Measure of Adjustments (not a meaningful measurement) -Report Structure: 1) Delete Regional Report, 2) Delete Number of Adjustments report -Disagg: Wording clarification -Standard: No changes- parity -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. The clarifications BST proposes delete the reporting interval (i.e., "the current month") and render the definition too vague. The original definition in the SQM should be retained but add, "by BellSouth to wholesale and retail customers" Exclusions: CLECs DISAGREE. Adjustments are as a result of billing inaccuracy. Most bill dispute resolutions could be called settlements. Also, BST must be held accountable for all regulatory mandated or contract rates as backbilling by BST must be verified as accurate Business Rules: CLECs DISAGREE. The business rules should be left "as is". The current rules provide detailed information on how calculation relates to the business and how the result is reported (percentage) are important to define the measure in a complete manner Calculation: CLECs DISAGREE. The word clarification changing "current" month to "reporting" month would impact the measure by having to submit billing disputes within the report month. CLEC must verify the billing accuracy and often cannot get that done in the report period Report Structure: CLECs DISAGREE. CLECs oppose deleting the number of adjustments, but regional report elimination is acceptable Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
B-2 (BST matrix, p 71-73)	-Title: Wording Clarification -Definition: Wording Clarification		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Business Rules: 1) Wording clarification, 2) Add language noting that CLEC bills and BellSouth bills transmitted in less than or equal to one day difference will be considered parity -Calculation: Wording clarification -Report Structure: Delete Regional report -Disagg: Wording clarification -Standard: No changes-parity -SEEM: No changes		Definition: CLECs DISAGREE. Critical to measure days to receipt as delays in the bill impact the CLECs' ability to pay the bill on time CLECs do not agree with language that 1 days' difference is parity Statistical tests will be the judge of what is parity Exclusions: No Change Business Rules: CLECs DISAGREE. The changes result in BST not being accountable for bill delivery The changes reflect a change in the measure the mean time to billing transmission /mailing It changes the entire meaning of the measure from "receipt of bill" to transmission of bill -- transmission or USPS does not equal delivery in a reasonable time Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. CLECs do not oppose change if no UNEs get billed out of CABs Standard: No Changes SEEM: No Changes
B-3 (BST matrix, p 73)	-Delete Measure Not a key measurement since it captures the accuracy of the packs, not the content of the packs		CLECs DISAGREE. This measure provides CLECs with an accounting of BST's ability to transmit data reliably CLECs cannot read packs if not formatted correctly This metric is needed to determine accuracy
B-4 (BST matrix, p 73)	-Delete Measure Measurement is similar to B-5 Both measure usage data delivery, but at different points B-4 at 30 days and B-5 at 6 days		CLECs DISAGREE. CLECs need this measure to protect against back-billing of usage charges on their monthly invoices Although B-5 may be capturing if the usage that gets billed appropriately makes its on-time benchmark, it does not pick up when BST goes back and finds it did not render a back-bill for some usage charges sent on DUFs and ADUFs to the CLEC

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
B-5 (BST matrix, p 73-74) (CLEC Response, Appendix B)	-Title: Wording clarification -Definition: Wording clarification and removal of last sentence which refers to a retail comparison which is not appropriate given that this measurement uses a benchmark -Exclusions: No changes -Business Rules: Wording clarification -Report Structure: Wording clarification -Calculation: No changes -Report Structure: No changes -Disagg: Wording clarification -Standard: Wording clarification -SEEM: No changes	Exclusion: Add exclusion for non-completed calls Business Rules: Add language to make clear the type of billable usage, particularly third party, that should be covered in this metric	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. CLECs accept change only if BST provides retail performance at 6 months review to reset benchmarks Exclusions: No Changes Business Rules: CLECs DISAGREE. CLECs believe the information on how soon after recording this data is expected to be sent out, even with the long interval for this metric, is important Calculation: No Changes Report Structure: No Changes Disagg: CLECs AGREE. Standard: CLECs AGREE. SEEM: No Changes
B-6 (BST matrix, p 74) (CLEC Response, Appendix B)	-Delete Measure -Measure is correlated to B-5 timeliness B-6 is average days to deliver, but is not measuring anything additional that is meaningful	Exclusion: Add exclusion for non-completed calls Business Rules: Add language to make clear the type of billable usage, particularly third party, that should be covered in this metric	CLECs DISAGREE. But CLECs might agree if a tighter benchmark is set for B-5 metric after examining data in this six-month review Also, such data for benchmark analysis of averages and dispersions of when the data is sent also must be provided in future reviews to evaluate whether the benchmark provides parity with BST's treatment of billing for its end users
B-7 (BST matrix, p 74)	-Delete Measure BellSouth does not bill the CLEC end user and BellSouth's recurring and non-recurring charges have little impact on the CLECs billing to the end user		CLECs DISAGREE CLECs would like to keep metrics that capture problems with back-billings Aged charges from past months are difficult to validate and disruptive to business plans and associated pricing Both late recurring and non-recurring charges need to be captured Ideally, those charges would be billed to the CLEC within 30 days of when the activity occurred
B-8 (BST matrix, p 74)	-Delete Measure BellSouth does not bill the CLEC end user and BellSouth's recurring and non-recurring charges have little impact on the CLECs billing to the end user		CLECs DISAGREE. BST should be held responsible for accurate billing This is not about CLECs billing end-user customers but the validation of bill completeness (Ex Covad has recently been

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	user		back-billed non-recurring charges for almost 2000 Line Sharing customers due to BST's billing inaccuracies) CLECs would like to keep metrics that capture problems with back-billings Charges coming from far in the past are hard to check and disruptive to business plans Both late recurring and non-recurring charges need to be captured if not on a bill with 30 days of when the activity occurred for which the CLEC is being billed
B-9 (BST matrix, p 74)	-Delete Measure -Measure has had no activity in last 12 months		CLECs TENTATIVELY AGREE. CLECs may allow deletion but would like to discuss first whether this is designed appropriately to capture any issues that may be being brought to BST's attention but does not rely on the forms that are counted in the measure
B-10 (BST matrix, p 75	-Delete Measure Dollar value of most of volume for this measure is very small This measurement evaluates all disputes equally, regardless of the value BellSouth is willing to consider another dispute timeliness metric		CLECs DISAGREE. Dollar value is not the issue but the measure of BST's responsiveness to requirement of 45 day response to BAR – regardless of dollar value of claims Many CLECs file large claims for adjustment and do not want to lose a metric that provides an incentive to move those claims to quicker resolution Of course, CLECs would be open to discussing improvements in the metric and promote prompt resolution of both large and small claims CLECs also have a concern that BST is claiming it's measuring on a line-item basis but the denominator counts appear too small to be done on a line item basis consistently CLECs had expected the denominator would be the number of claims filed and not the line items on those claims
B-11 Billing Completion Notice Timeliness (CLEC response Appendix A, p 1-2)		-New Measure Measures the percent of completed orders for which BellSouth sent a timely billing completion notice to the CLEC Add to SEEM Tier 1 and Tier 2	

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Operator Services/Directory Assistance			
OS-1 (BST matrix, p 75)	-Delete Measure Measure is Parity by Design		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
OS-2 (BST matrix, p 75)	-Delete Measure Measure is Parity by Design		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
DA-1 (BST matrix, p 75)	-Delete Measure Measure is Parity by Design		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
DA-2 (BST matrix, p 75)	-Delete Measure Measure is Parity by Design		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
D-1 (BST matrix, p 75)	-Delete Measure Process is essentially Parity by Design		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
D-2 (BST matrix, p 76)	-Delete Measure Accuracy of databases is also being assessed by the mechanized service order accuracy measurement		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
D-3 (BST matrix, p 76)	-Delete Measure Not a key measurement and BellSouth's performance has been excellent If problems loading NXX and LRNs, problems would affect the M&R measurements		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
E-911			
E-1 (BST matrix, p 76)	-Delete Measure Measure is Parity by Design		CLECs DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
E-2 (BST matrix, p 76)	-Delete Measure Measure is Parity by Design		CLECS and the FPSC to monitor BellSouth's performance
E-3 (BST matrix, p 76)	-Delete Measure Measure is Parity by Design		CLECS DISAGREE The fact that a measure is parity by design does not obviate the need for CLECS and the FPSC to monitor BellSouth's performance
Trunk Group Performance			
TGP-1 (BST matrix, p 76-78) (CLEC Response, Appendix B)	-Title: Modified title to combine TGP-1 (aggregate) and TGP-2 (CLEC Specific) -Definition: Wording clarifications -Exclusions: Wording clarifications -Business Rules: Wording clarifications -Report Structure: Add CLEC specific report -Disagg: Add CLEC specific -Standard: wording clarifications -SEEM: Added to Tier 1	Business Rules: Add phrase to notification process that states, BellSouth should notify the CLEC's traffic planning group or representatives via email when such blocking meets this exclusion criteria	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. CLECs do not see where the description of how parity is compared is picked up in business rules CLECs want language describing the hour by hour comparison in the metric Exclusions: CLECs AGREE CLECs accept the moving of the definition of "unanticipated significant traffic" and wording change for another exclusion Business Rules: CLECs AGREE CLECs do not oppose the deleted language but desire a clarification of how the metric compares blocking hours Calculation: No Changes Report Structure: CLECs AGREE. CLECs agree to combine with each result reported separately, CLEC aggregate, CLEC specific, BST blocking Disagg: CLECs DISAGREE. CLEC-aggregate and CLEC-specific results should be reported separately, once with and once without CLEC-caused exclusions BST needs to explain "where applicable" language before CLECs can agree

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			Standard: CLECs AGREE. SEEM: CLECs AGREE.
TGP-2 (BST matrix, p 78) (CLEC Response, Appendix B)	-Delete Measure Combined into TGP-1		CLECs AGREE. As long as existing notification language on CLEC-caused blocking gets added to TGP-1
Collocation			
C-1 (BST matrix, p 78-79)	-Title: Modified title -Definition: Wording clarifications -Exclusions: No changes -Business Rules: Wording clarifications -Calculation: No changes -Report Structure: Wording clarifications -Disagg: Wording clarifications -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. CLECs agree with the caveat that the method of measurement must be detailed (i.e., "average", "calendar days") in other sections Exclusions: No Changes Business Rules: CLECs AGREE. Calculation: No Changes Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
C-2 (BST matrix, p 79-80)	-Title: Modified title -Definition: Wording clarifications -Exclusions: Add exclusion for any bona fide firm order with a CLEC negotiated interval longer than the benchmark interval -Business Rules: 1) Wording clarifications, 2) Delete sentence referring to cable assignments -Calculations: No changes -Report Structure: Wording clarification		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. Retain original definition BST's clarifications make definition to vague Exclusions: CLECs AGREE. Business Rules: CLECs AGREE. Calculation: No Changes Report Structure: CLECs AGREE. Disagg: CLECs AGREE.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
	-Disagg: Revise to conform to FPSC collocation order -Standard: See disagg changes -SEEM: No changes		Standard: CLECs AGREE. SEEM: No Changes
C-3 (BST matrix, p 80-81)	-Title: Modified title -Definition: Wording clarifications -Exclusions: No changes -Business Rules: Wording clarification -Calculation: Wording clarification -Report Structure: Wording clarification -Disagg: Wording clarification -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: No Changes Business Rules: CLECs DISAGREE. Retain last sentence "The arrangement is considered a missed due date " because it defines "due date " Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
Change Management			
CM-1 (BST matrix, p 81-82)	-Title: Modified title -Definition: Wording clarification (added definition of CCP) -Exclusions: Wording clarification -Business Rules: Wording clarification -Calculation: No changes -Report Structure: No changes -Disagg: Wording clarification -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. Business Rules: CLECs DISAGREE. We need to keep the original business rules We agree with the interval start and stop but retain the original business rules Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: CLECs AGREE. SEEM: CLECs AGREE.
CM-2	-Delete Measure		

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p 82)	-CM-2 is not needed because it only measures those notices missed in the CM-1 measurement		CLECs AGREE.
CM-3 (BST matrix, p 82-83)	-Title: Modified title -Definition: Wording clarification (add definition of CCP) -Exclusions: Wording clarification -Business Rules: Wording clarification -Calculation: Wording clarification -Report Structure: No changes -Disagg: Wording clarification -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs DISAGREE. BST's changes make exclusions even vaguer thereby leaving the exclusions open to abuse They take away specific exclusions which should be retained Business Rules: CLECs AGREE. Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: CLECs AGREE. SEEM: CLECs AGREE.
CM-4 (BST matrix, p 83)	-Delete Measure --CM-4 is not needed because it only measures those notices missed in the CM-3 measurement		CLECs AGREE.
CM-5 (BST matrix, p 83)	-Title: Modified title -Definition: Wording clarification -Exclusions: No changes -Business Rules: Wording clarification -Calculation: No changes -Report Structure: No changes -Disagg: No changes -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: No Changes Business Rules: CLECs AGREE. Calculation: No Changes Report Structure: No Changes Disagg: No Changes CLEC Note The list of systems in the disaggregation portion of this measure (notification of outages) should match the systems in the CCP document See below for CCP list From CCP Document A Type 1 System Outage is a condition where the CLEC Pre-orders / Orders /

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			Queries / Maintenance Requests cannot be submitted or will not be accepted by BellSouth Interfaces or Gateways LENS - Local Exchange Navigation System EDI - Electronic Data Interchange TAG - Telecommunications Access Gateway TAFI - Trouble Administration Facilitation Interface EC-TA - Electronic Communications Trouble Administration Local CSOTS - CLEC Service Order Tracking System CCP Legacy Systems SOCS - Service Order Communications System LMOS - Loop Maintenance Operations System RSAG - Regional Street Address Guide ATLAS - Application for Telephone Number Load Administration & Selection LFACS - Loop Facilities Assignment & Control System CRIS - Customer Records Information System CABS - Carrier Access Billing System IBS - Integrated Billing Solutions WFA - Work Force Administration Linkages LEO - Local Exchange Ordering LESOG - Local Exchange Service Order Generator LNP Gateway - Local Number Portability Gateway LAUTO - Local Number Portability Automation SGG - ServiceGate Gateway SOG - Service Order Generator DOM - Delivery Order Manager Standard: No Changes SEEM: No Changes

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
CM-6 (BST matrix, p 83-84)	-Title: Modified title -Definition: Wording clarification -Exclusions: No changes -Business Rules: Wording clarifications -Calculation: Wording clarifications -Report Structure: Report scope changed to region -Disagg: Wording clarification -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: No Changes Business Rules: CLECs DISAGREE. Levels of severity are included except for severity 1 It should be included based on the way the CCP is established Calculation: CLECs DISAGREE. Clarify the number of days to correct the problem Critical to include in the calculation Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
CM-7 (BST matrix, p 84-85)	-Title: Modified title -Definition: Wording clarification -Exclusions: Wording clarification -Business Rules: Wording clarification -Calculation: Wording clarification -Report Structure: Report scope changed to region -Disagg: Wording clarification -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. Business Rules: CLECs AGREE. Calculation: CLECs DISAGREE. The calculation in the denominator is being changed to "responded to" from "submitted" This changes the possible number of entries for the denominator Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
CM-8 (BST matrix, p 85-86)	-Title: Modified title -Definition: Wording clarification -Exclusions: Wording clarification -Business Rules: Wording clarification -Calculation: Wording clarification -Report Structure: Report scope changed to region -Disagg: Wording clarification -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs AGREE. Business Rules: CLECs AGREE. Calculation: CLECs AGREE. Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
CM-9 (BST matrix, p 86-87)	-Title: Modified title -Definition: Wording changes to correct a mistake in labeling the severity defects -Exclusions: No changes -Business Rules: 1) Wording changes to correct severity level numbers, 2) Wording clarification of the CCP -Calculation: Wording changes to correct severity level numbers -Report Structure: 1) Wording clarifications to correct severity level numbers , 2) Report scope changed to region -Disagg: Wording clarifications to correct severity level numbers -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs DISAGREE. See note below Exclusions: CLECs DISAGREE. See note below Business Rules: CLECs DISAGREE. See note below Calculation: CLECs DISAGREE. See note below Report Structure: CLECs DISAGREE. See note below Disagg: CLECs DISAGREE. See note below Standard: No Changes SEEM: No Changes CLEC NOTE: CLECs DISAGREE. The purpose of this measure is to determine defects in production releases Excluding Severity level 1 defects from this measure impacts the validity of the overall measures BST is attempting to have these Severity 1 'production' outages 'captured' in CM-5 Where this might be appropriate to complete the overall measure of outages, it also must be included in this measure to provide a truer picture of defects during productions This data should be a part of both

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM- Changes (7/28/04)	Response (Agree/Disagree)
			measures for accurate representation of the metrics
CM-10 (BST matrix, p 87)	-Title: Modified title -Definition: Wording clarification -Exclusions: No changes -Business Rules: No changes -Calculation: No changes -Report Structure: Report scope changed to region -Disagg: Wording clarification -Standard: No changes -SEEM: No changes		Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: No Changes Business Rules: No Changes Calculation: No Changes Report Structure: CLECs AGREE. Disagg: CLECs AGREE. Standard: No Changes SEEM: No Changes
CM-11 (BST matrix, p 88-89) (CLEC Response, Appendix B)	-Title: Modified title -Definition: Wording clarification -Exclusions: No changes -Business Rules: No changes -Calculation: No changes -Report Structure: Report scope changed to region -Disagg: Wording clarification -Standard: No changes -SEEM: No changes	Title Modified Title (Delete within 60 weeks of prioritization and replace with "specified interval") Exclusions Delete 60 weeks and replace with specified interval Business Rules Add language stating that BellSouth will implement software related changes within 60 weeks and process related changes within 60 calendar days Calculation Delete 60 weeks/days from calculation	Title: CLECs DISAGREE. See CLEC comment under SQM-All Measures section Definition: CLECs AGREE. Exclusions: CLECs DISAGREE. See CLEC proposal Business Rules: No Changes CLECs DISAGREE. See CLEC proposal Calculation: CLECs DISAGREE. CLECs need clarification on "most recent" vs "first" release prioritization BST appears to be substantially altering the calculations This warrants further discussion at the workshop Report Structure: CLECs AGREE. Disagg: CLECs DISAGREE. Disaggregation appears to be inconsistent with report structure Standard: No Changes SEEM: No Changes
Appendices			
Appendix A	Delete Appendix A		CLECs DISAGREE . CLECs propose that BST add the standard reporting levels with definition

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
(BST matrix, p 89)	-Reporting Scope		example Region State
Appendix B (BST matrix, p 89)	Title: Change from Appendix B to A -Updates and corrections		CLECs DISAGREE. CLECs propose that BST SEEM SME and CLECs' representative review each definition and provide joint recommendation on changes during review period In addition, CLECs propose to define test orders as those orders that do not involve "live" customers
Appendix C (BST matrix, p 90-91)	Title: Change from Appendix C to Appendix B C-1: -Delete info regarding BellSouth's internal audit policy C-2: 1) Wording clarifications, 2) Insert language that states it is not necessary for BellSouth to undergo an audit of the SQM for every CLEC with which it has a contract, 3) Remove reference to undergo an audit each year for the next five years and replace with every other year for the next five years, 4) Remove reference to third party auditor being jointly selected by BellSouth and the CLEC 5) Insert language that states, "the costs shall be borne 50% by BellSouth and 50% by the CLEC. If no party is sharing the costs of this audit, BellSouth may utilize its internal auditing organization, 6) Revise language to state that independent third party auditor shall be selected by BellSouth, with input from PSC, and other parties bearing the cost of the audit 7) Delete referenced to BellSouth, PSC, and CLECs jointly determining scope of audit and add language that states, "Due to the regional nature of the processes used to generate performance metric data, BellSouth will agree to no more than one regional third party audit within its region per year 8) Remove the word SEEM from paragraph noting the intention of the audits		Title: CLECs DISAGREE. Keep as Appendix C Also, see CLEC comment under SQM-All Measures section C-1: CLECs DISAGREE. BST attempts to change the audit structure to audit the PMQAP as the external audit. CLECs agree to include the PMQAP in an external audit in addition to BST's own internal auditing process. It is important for the Commission and CLECs to know what internal process or audit are in place to monitor BST's adherence to proprietary processes C-2: 1) CLECs DISAGREE. BST's contractual obligations are between BellSouth and CLEC, therefore, not subject to change 2) CLECs DISAGREE. What BST agreed to in a contract with a CLEC is not a part of this BellSouth Audit policy. As BST undertook a separate agreement with the CLEC(s) in question and should comply with the IA unless both parties agree to amend that IA for removal 3) CLECs DISAGREE. While CLECs may agree to an audit every other year, CLECs do not agree to change the external 'comprehensive audit at the aggregate level reports' to the PMQAP 4) CLECs DISAGREE. An external audit or

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
			internal audit conducted by a third party should include a process for vendor selection to include the sponsors of the audit, i e, BST, PSC, and CLECs regardless of who bears the cost of the audit 5) CLECs DISAGREE. BellSouth self-auditing will result in a prejudiced result 6) CLECs DISAGREE. An external audit or internal audit conducted by a third party should include a process for vendor selection to include the sponsors of the audit, i e, BST, PSC, and CLECs regardless of who bears the cost of the audit 7) CLECs DISAGREE IN PART. CLECs do not disagree that a regional audit may be appropriate but language should be included that addresses the state differences between ordered PSC measures and the coordination of multiple PSC involved in the audit process 8) CLECs DISAGREE. See CLEC position on SEEM
Appendix D (BST matrix, p 91)	-Title: Change from Appendix D to Appendix C -Update interface tables -Remove OSS-1 and OSS-4 from Appendix---propose to delete measures		CLECs DISAGREE. This should remain the same with the exception of those systems interfaces added to the tables, i e TAG-XML, SGG
New Appendix (BST matrix, p 92)	-New Appendix D to add new Reposting Policy.		CLECS AGREE.
New Appendix (BST matrix, p 92)	-New Appendix E to add Description of Raw Data and other Supporting Data Files.		CLECS DISAGREE. BST is making significant changes affecting CLECs' access to Raw Data and the usability of that data. In addition, it appears that BST is removing their obligation to provide certain raw data files (i.e., Pre-Ordering, Collocation, Database Updates...) that they are currently providing. These changes are not consistent with the current SDUM and require further discussion between BST and the CLEC Coalition.

Measure/ Reference	BellSouth Proposed SQM Changes (7/28/04)	CLEC's Proposed SQM Changes (7/28/04)	Response (Agree/Disagree)
Flow Through Matrix (BST matrix, p 93)	-Remove Flow Through Matrix from SQM and make available through BellSouth website.		CLECs AGREE.
Performance Improvement Plan and Resolution Process			
Performance Plans to improve wholesale performance (CLEC Response, p 6-7)		Develop a process where performance that may be in parity, but of poor quality can be brought to BellSouth's attention with a request that such performance be improved	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail on this 27th day of August 2004 to:

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CLEC Coalition Proposed Changes

Row #	Proposed Change	CLEC Reasoning	BST Response
1	Measure-Based Concept <u>(NOTE: This row is recommended for deletion from this particular matrix of proposed changes given that the measure-based concept is not a proposed change to the existing Florida SEEM Plan. However, additional reasoning for a measure-based concept is specified in the next column)</u>	Transaction-based remedies provide an incentive for BellSouth to give worse service, in order to suppress CLEC volumes <u>Maintains continuity with the current remedy plan</u> <u>Addresses the need for sufficient remedies even at small volumes</u> <u>Violations give evidence of processes being out of parity. Measure-based plans tie the remedy to motivating behavior to provide incentive to fix the process</u>	Measure-based plan: > Fatal flaw not scalable > Assesses the same penalty amount whether there is 1 failed transaction or 1000 > High penalty on "first offense" of missing a measurement > History showed inherent difficulty of attempting to forcibly graft severity feature onto measure-based plan > False appearance of reflecting the degree of severity > Problems with overlaying severity of measure-based plan 1 no direct linkage to performance, 2 inability to link corrective action to performance failure, 3 arbitrary measures of severity, 4 huge payments for small performance differences, 5 imposition of arbitrary caps, and 6 penalties increasing simply due to growth in number of customers served by CLECs

Florida Public Service Commission

SEEM Technical Matrix

Row #	Proposed Change	CLEC Reasoning	BST Response
2	Base Remedy Payment Calculation $d * \text{SQRT}(n) * B$ d = disparity index = CLEC Perf / Applicable Std - 1 B = Factor varies by Meas / Prod Cat	- <u>Essential to incorporate severity considerations in the determination of the remedy amount</u> - <u>Measures severity in terms of the CLEC performance relative to either the ILEC performance or a designated benchmark</u> - <u>Disparity index derived based on like-to-like comparisons</u> - <u>Disparity index capped to avoid extreme remedies when BellSouth's support for its own customers is extremely better than how it supports CLEC customers</u> - <u>Incorporates volume while maintaining adequate incentives at low volumes and avoiding extreme incentives at high volumes</u> - <u>Remedies designed to be close to the remedy amounts in the current SEEM fee schedule</u> - <u>Bases remedies on the disparity index which is similar to what FPSC Staff previously recommended</u> - <u>Addresses concerns raised about the magnitude of per submetric remedy amounts</u>	
3	\$25,000 Limit on First Month Violation		>
3.1	<u>Small Volume Cap</u>	- <u>Further limits potential remedies at small volumes for proportion parity measures</u> - <u>Address concerns about large remedies at low volumes</u>	>
4	Persistence Factor	> <u>Remedy amounts for Tier 1 should escalate in the same fashion across all domains</u> > <u>System problems should be subject to administrative review</u> > <u>BellSouth continually reports below-standard performance for some submeasures</u> > <u>Factors approximate those in current fee schedule</u>	> Currently - o No basis for escalation rate each month - o Application of escalation feature only compounds arbitrarily punitive nature of plan - o Tier 1 was designed to be liquidated damages - o Each month's failures are separate transactions unrelated to transactions in previous months

Florida Public Service Commission

SEEM Technical Matrix

Row #	Proposed Change	CLEC Reasoning	BST Response
5	<u>Tier-2</u> <u>(NOTE: This row is recommended for deletion from this particular matrix given that the Tier 2 calculation is not a proposed change to the existing Florida SEEM Plan.)</u>	> Status Quo > <u>Allows the Tier 1 implementation to be evaluated prior to disruption caused by modifications. If the modified Tier 1 proves to enable the generated remedies to be effective in motivating compliant performance by BellSouth, then potential changes associated with Tier 2 would be avoided.</u>	>

BellSouth Proposed Changes

Row #	Proposed Change	BST Reasoning	CLEC Response
1	Remedy Plan based on Transaction-based system	Transaction-based approach: > Inherently scalable > Straightforward variation of penalties based on severity > Transaction-based plan is preferable as a general proposition, from a practical standpoint > Currently, at least 40 states, including Florida, use transaction-based plans	>
2	Quantifying disparate transactions	> Counts number of disparate transactions and pays penalties on those > Most direct and logical approach - o Alter the most damaging "out-of-parity" situations first - o Alter next most damaging until "parity" is achieved > Corrects transactions having greatest potential customer impact first, before correcting those having lesser potential impact	>
3	Interpolation for Total Affected Volume	> All transactions in final cell may not need to be altered for "parity" > Appropriate action interpolate to bring sub-metric into "parity"	>
4	Parity Point versus Detection Point	BellSouth is obligated to pay penalties under SEEM only up to the point necessary to achieve "parity" of service for CLECs	>

Row #	Proposed Change	BST Reasoning	CLEC Response
5	Amounts per transaction	> Current Plan problematic - o Exorbitant penalties - o Bear no rational relationship to • Performance provided to CLECs • Service charges associated with such penalties • Damage (if any) sustained - o Often amount to years worth of free service > Current transaction-based fees in other states - o Outdated - o Continued use is unwarranted and inefficient - o Resulted from evidence presented to GPSC in 2000 - o Developed with much less CLEC activity - o Fee schedule artificially high, although thought to be too low initially - o Penalty amount/transaction – excessive relative to typical rate for service - o Artificially high fee schedule compounded with increased CLEC activity cause transaction-based payment to scale too high > Two fee schedules proposed - o New standard fee schedule - o Low performance schedule • Will apply if performance materially deteriorates from current levels • Same as fee schedule currently in all other transaction-based SEEMs for BellSouth - o Allay any concerns that Proposed SEEM is too soft to deter backsliding - o If performance deteriorates by a statistically significant degree from baseline, then fees increase dramatically - o Permits BellSouth to avoid penalties w/ statistically significant improvement in overall performance > More in line with rebates in commercial transactions where performance guarantees are provided	>

Row #	Proposed Change	BST Reasoning	CLEC Response
6	“High Performance” / “Standard Performance” / “Low Performance” Enforcement Mechanisms Methodology (Tier 1) Section 4 3 1 4 If BellSouth's performance in the current month should exceed the baseline level by three standard deviations, no Tier-1 payment will apply for any CLEC in that month Enforcement Mechanisms Methodology (Tier 2) Section 4 3 2 2 If BellSouth's performance, as measured by the average percent of submetrics met for the three months used to determine whether Tier 2 applies in the current data month, exceeds the baseline performance by three standard deviations, no Tier-2 payment will apply for any CLEC in the current data month Need example showing how this will work for each possible combination Benchmark/Parity/Mean/Proportion	> Implements new anti-backsliding mechanism > Professed role of SEEM provide another mechanism to deter backsliding in performance > Other mechanisms exist to address backsliding - o Complaints to federal and state commissions - o Monitoring by those same commissions - o Contract provisions - o Court actions > Facts show that there has been no backsliding under the current SEEM > Provision requires SEEM to revert to a much more punitive SEEM if performance deteriorates materially > Additional incentive relieves BST of payments if a material improvement in overall performance occurs - o To improve performance - o To partially compensate for the risk of reverting to fee schedule used currently for other transaction-based plans > Existing plan requires BST to provide CLECs better service in the aggregate than retail in order to eliminate penalty payments - o Performance for each CLEC is compared to BST's average performance across a geographic area - o Contrary to intent of SEEM	>
7	Disaggregation Cell: Wire Center, dispatched, service-type, # of circuits	> Desired for each Domain, but not proposed to this extent - o 1 measure of timeliness - o 1 measure of accuracy > Measures of some intermediate processes were removed - o Little, if any, customer effect - o Any significant customer effect would likely be reflected in other measures	> Disaggregation should allow for like-to-like comparisons The current set of submetrics facilitates accurate comparisons of results to expected performance

Row #	Proposed Change	BST Reasoning	CLEC Response
8	Degree of Escalation	> Tier 1 fee amounts would only escalate in month 2 > Tier 2 penalties apply beginning in month 3 > More fully utilizes the Tier 2 mechanism, which was designed to address cases of persistent metric failures	>
9	To pay or not to pay for only 1 failed month Enforcement Mechanisms Definitions Section 4 1 7 Tier-1 Enforcement mechanisms - for any <u>two consecutive months</u> as calculated by BellSouth Enforcement Mechanisms Methodology Section 4 3 1 Tier-1 Enforcement Mechanisms will be triggered in a given month for two (2) consecutive months	> Situation more likely problematic when volumes are low - o Currently, due to excessive disaggregation - o Still to some extent in Tier 1 for proposed plan > Does not represent discriminatory practice > Some failures are anomalies - o No systemic changes required to address failures - o Random occurrences • temporary random system malfunction • random human error - o No corrective action can be taken - o Neither predictable nor preventable - o Penalty clearly inconsistent with objectives of SEEM > Assessing penalties based on a single-month failure equates statistical significance with materiality - o Only deals in probabilities and not certainties - o Depends on inputs for certain materiality parameters such as Delta, Psi and Epsilon - o Only identify statistically significance - o Cannot determine actual materiality > Commission has already adopted for Verizon > Virtually removes likelihood of assessing remedies for random occurrences	>

Row #	Proposed Change	BST Reasoning	CLEC Response
10	Delta Enforcement Mechanisms Definitions Section 4 1 6 Delta - For individual CLECs submittes the Delta value shall be determined using Ford's Delta Function as ordered by the Florida Public Service Commission- 1 0 and for the CLEC aggregate the Delta value shall be 0 5	> Single delta value - o Tier 1 of 1 0 - o Tier 2 of 0 5 > Current delta function - o Initially proposed by Z-Tel's economist Dr Ford - o To address adjustment to the statistical balancing methodology - o Dr Ford introduced some confusion about several key hypothesis testing issues (1) statistical hypothesis test's significance level (2) interpretation of a "balanced" hypothesis test (3) reasons for using "balancing" in SEEM plan > No need for "fix" of Dr Ford's delta function - o No reason to conclude serious flaws are in the balancing methodology - o No indication of problem initially alleged by Dr Ford in all 7 of BST's states with single delta value > Use of delta function introduces additional variables - o Requiring subjective exercise in determining values - o Probably creates more problems than it solves	>
11	Appendix C Statistical Properties and Definitions C.1.5: Trimming	> Originated in Louisiana Workshop in 1999 - o CLEC volumes and distributions were much smaller than they are now - o Distributional differences no longer a factor > Requires each observation to be discarded be examined to determine if true business reason exists for discarding this real data > Defeats Self Effectuating aspect of SEEM plan	>

Florida Public Service Commission

SEEM Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
12	Appendix D Statistical Formulas and Technical Descriptions Beginning on page 101 Revised Section D to incorporate the change from measurement-based plan to a transaction based plan and to change from the floating delta approach, based on the Ford delta function, a fixed delta of 1 0 for Tier 1 and 0 5 for Tier 2 See Exhibit B, Appendix D	Section D has been substantially revised to reflect the change from a per-measurement based SEEM plan to a per-transaction based SEEM plan Therefore, the entire section is shown in red	➤
13	Appendix C Statistical Properties and Definitions Section C The statistical process for testing whether BellSouth's (BST) wholesale customers (alternative local exchange carriers or CLECs) are being treated equally with BST's retail customers involves more than a simple mathematical formula Three key elements need to be considered before an appropriate decision process can be developed These are the type of • data • comparison • performance This section describes the properties of a test methodology and the truncated Z statistic for fourtwo types of measures	This change reflects the fact that BellSouth's proposal does not include rate or ratio measures and to correct ALEC to read CLEC	➤
14	Appendix C Statistical Properties and Definitions Section C 1 Necessary Properties for a Test Methodology Once the key elements are determined, a test methodology should be developed that complies with the following properties • Like-to-Like Comparisons • Aggregate Level Test Statistic • Production Mode Process • Balancing • Trimming	Changed to reflect the removal of the trimming of data in the process See rationale below for Appendix C, section C 1 5	➤
15	Appendix C Statistical Properties and Definitions C 1 1 Like-to-Like Comparisons When possible, data should be compared at appropriate levels, e g wire center, time of month, dispatched residential, new orders The testing process should • Identify variables that may affect the performance measure • Record these important confounding covariates • Adjust for the observed covariates in order to remove potential biases and to make the <u>CLEC</u> ALEC and the ILEC units as comparable as possible	Correction	➤
16	Appendix C Statistical Properties and Definitions	Correction	➤

Row #	Proposed Change	BST Reasoning	CLEC Response										
	C 1 2 Aggregate Level Test Statistic Each performance measure of interest should be summarized by one overall test statistic giving the decision maker a rule that determines whether a statistically significant difference exists. The test statistic should have the following properties • The method should provide a single overall index on a standard scale • If entries in comparison cells are exactly proportional over a covariate, the aggregated index should be very nearly the same as if comparisons on the covariate had not been done • The contribution of each comparison cell should depend on the number of observations in the cell • Cancellation between comparison cells should be limited • The index should be a continuous function of the observations												
17	Appendix C Statistical Properties and Definitions C 1 6 Measurement Types The performance measurements that will undergo testing are of fourtwo types: mean, rate,and proportion, and rate. All fourBoth have similar characteristics. Different types of data are used to calculate them. Table C-1 shows the type of data that is used to derive each measurement type Table C-1: Measurements Types and Data <table><tr><th>Measurement Type</th><th>Data Used to Derive Measure</th></tr><tr><td>Mean</td><td>Interval measurements</td></tr><tr><td>Rate</td><td>Counts</td></tr><tr><td>Proportion</td><td></td></tr><tr><td>Rate</td><td></td></tr></table>	Measurement Type	Data Used to Derive Measure	Mean	Interval measurements	Rate	Counts	Proportion		Rate		These changes reflect the fact that there are no rate or ratio measures in BellSouth's proposed SEEM plan. There are no ratio measures in the existing SEEM plan either	^
Measurement Type	Data Used to Derive Measure												
Mean	Interval measurements												
Rate	Counts												
Proportion													
Rate													
18	Appendix C Statistical Properties and Definitions C.2 Testing Methodology—The Truncated Z The calculation of the Truncated Z statistic is described in Appendix A of the "Louisiana Statistician's Report." The methodology described in this document is the same as that described in the "Statistician's Report," however, this document contains extra technical details to avoid undefined situations when programming the technique. In summary, many covariates are chosen in order to provide meaningful comparison levels below the sub-metric level chosen for the parity comparison. This includes such factors as wire center and time of month, as well as order type for	These changes are added to make minor corrections and to delete the discussion concerning the Louisiana study, which is not necessary for an understanding of the statistical methodology	^										

Row #	Proposed Change	BST Reasoning	CLEC Response
	provisioning measures. In each comparison cell, a Z statistic is calculated. The form of the Z statistic may vary depending on the performance measure, but it should be distributed approximately as a standard normal, with mean zero and variance equal to one. Assuming that the test statistic is derived so that it is negative when the performance for the <u>CLEC ALEC</u> is worse than for the <u>ILEC</u>, a positive truncation is done – i.e. if the result is negative it is left alone, if the result is positive it is changed to zero. A weighted <u>sample</u> average of the truncated statistics is calculated where a cell's weight depends on the volume of BST and <u>CLEC ALEC</u> orders in the cell. The weighted <u>sample</u> average is standardized by the subtracting the theoretical mean of the truncated distribution, and this is divided by the standard error of the weighted sum. Summaries based on measurement type are given for the calculation of the cell Z statistic.		
19	Appendix C Statistical Properties and Definitions C 2 1 Mean Measures For mean measures, an adjusted, asymmetric t statistic is calculated for each like-to-like cell that has at least seven BST and seven <u>CLEC ALEC</u> transactions. This statistic is an adjustment to the modified z-statistic in order to make the assumption that the statistic is approximately normally distributed more reasonable even for fairly small sample sizes. The adjusted, asymmetric t-statistic is part of the methodology described in the "Statistician's Report," and it has been documented for the statistical community in the August 2004 issue of <u>The American Statistician</u>, a peer-review statistics journal. The statistic was created for mean performance measure party tests in order to reduce the number of permutation tests needed for calculating cell statistics. Several sets of BST/CLEC mean measure data from Louisiana were examined in order to determine when the adjustment results give approximately the same results as a permutation test. The result is that a permutation test is used when one or both of the BST and CLEC ALEC sample sizes is less than seven. The adjusted, asymmetric t statistic and the permutation calculation are described below in <u>Appendix D. Statistical Formulas and Technical Description</u>.	These changes are added for clarification purposes and to delete the discussion concerning the Louisiana study, which is not necessary for the understanding of the statistical methodology	>

Row #	Proposed Change	BST Reasoning	CLEC Response
20	Appendix C Statistical Properties and Definitions C 2 2 Proportion Measures For performance measures that are calculated as a proportion, in each adjustment cell, the cell Z and the moments for the truncated cell Z can be calculated in a direct manner. In adjustment cells where proportions are not close to zero or one, and where the sample sizes are reasonably large ($n_{ij}(1-p_{ij}) > 9$), a normal approximation can be used. In this case, the moments for the truncated Z come directly from properties of the standard normal distribution. If the normal approximation is not appropriate, then the Z statistic is calculated from the hypergeometric distribution. is the exact permutation distribution. In this case, the moments of the truncated Z are calculated exactly using the hypergeometric probabilities.	These changes are added for clarification purposes	>
21	Appendix C Statistical Properties and Definitions C 2 3 Rate Measures The truncated Z methodology for rate measures has the same general structure for calculating the Z in each cell as proportion measures. For the rate measure customer trouble report rate there are a fixed number of access lines in service for the ALEC, b_2j, and a fixed number for BST, b_1j. The modeling assumption is that the occurrence of a trouble is independent between access lines, and the number of troubles in b access lines follows a Poisson distribution with mean b where is the probability of a trouble per 1 access line and $b (= b_1j + b_2j)$ is the total number of access lines in service. The exact permutation distribution for this situation is the binomial distribution (the limit for the hypergeometric distribution) that is based on the total number of BST and ALEC troubles, n, and the proportion of BST access lines in service, $qj = b_1j/b$. In an adjustment cell, if the number of ALEC troubles is greater than 15 and the number of BST troubles is greater than 15, and $n_{ij}(1-qj) > 9$, then a normal approximation can be used. In this case, the moments of the truncated Z come directly from properties of the standard normal distribution. Otherwise, if there are very few troubles, the number of ALEC troubles can be modeled using a binomial distribution with n equal to the total number of troubles (ALEC plus BST troubles). In this case, the moments for the truncated Z are calculated explicitly using the binomial distribution.	This proposed deletion of the existing language reflects the fact that there are no rate measures in BellSouth's proposed SEEM plan	>
22	Appendix C Statistical Properties and Definitions	This change reflects the fact that there are no ratio	>

Florida Public Service Commission SEEM Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
	C 2 4 Ratio Measures The current plan contains no measures that call for the use of a Z-pairty statistic	measures in either the existing or the proposed SEEM plan	

CLEC Coalition Proposed Changes

Proposed Change	CLEC Reasoning	BST Response
Administrative Review: After 6 consecutive violations, the affected CLEC has the right to request an administrative review by Staff Similarly, after 6 months of Tier 2 violations, any CLEC with volume for that submeasure has the right to request an administrative review.	At the review, the CLEC could propose additional actions to identify the source of that problem and to alleviate it	>
PARIS Reporting The CLEC Coalition requests that this Commission require BellSouth to report the specific information in its CLEC-specific PARIS reports for each submeasure to Disclose Degree of Non-Compliance. The CLEC Coalition proposes that BellSouth be required to Disclose Source of Adjustments and cite detailed requirements as to what information should be disclosed and how.	Disclose Degree of Non-Compliance > Currently - o Inadequate to understand level of severity - o Only remedy amounts are provided - o No underlying data for compliance determination calculations > Disclose degree of non-compliance for a given violation > Greater visibility into non-compliance determination > Better understanding of how remedy amounts were derived > Data currently reported in LA, but not necessarily useful to them > Should help to provide delta comparisons Disclose Source of All Adjustments > Currently - o No disclosed substantiation for adjustments - o No reference linking adjustment to a notification or description to clearly determine the source - o Multiple adjustments, possibly from different errors, sometimes posted in single total adjustment	A

SEEM Non-Technical Matrix
BellSouth Proposed Changes

Row #	Proposed Change	BST Reasoning	CLEC Response
1	Reporting 2.1 with BellSouth's SQMs and pay penalties in accordance with the applicable SEEMs, which are posted on the Performance Measurement Reports website	Clarification and correction	> CLECs AGREE.
2	Reporting 2.2 BellSouth will also provide electronic access to the available -raw data underlying the SQMs	Correction	> CLECs AGREE.
3	Reporting 2.4 Final validated SEEM reports will be posted on the <u>Performance Measurements Reports website on the 15th day of the month</u> , following the <u>posting of final validated SQM reports for that data month or the first business day thereafter</u>	Clarification	> CLECs AGREE assuming the language change does not negate BellSouth's responsibility to provide SEEM payments 15 days after month that succeeds the data month. > CLECs DISAGREE.
4	Reporting 2.6 BellSouth shall pay penalties to the Commission, in the aggregate, for all incomplete or inaccurate reposted SQM reports in the amount of \$400 per day See Appendix G for definition of "reposted"	Only changes that are significant enough to trigger reposting according to the criteria could have a meaningful effect on data accuracy	> Due to the criteria associated with reposting determinations, sanctions for incomplete or inaccurate reporting could be mitigated. BellSouth has provided no rationale for elimination of their obligation to pay penalties for incomplete or inaccurate reporting. The penalty is intended to motivate BellSouth to be complete in its reporting.
5	Reporting 2.7 Tier II SEEMs payments and Administrative fines and penalties for late, incomplete , and reposted reports will be sent via Federal Express to the Commission. Checks and the accompanying transmittal letter will be postmarked on or before the 15th of the month <u>on the first business day thereafter</u>	To the extent that posted performance measurement reports are incomplete, the Reposting Policy covers the requirements to repost the data, and consequently to pay associated penalties. Accordingly, there is no need to reflect separately a penalty associated with incomplete reports. Wording is also provided to clarify that the due day for the postmarked transmittal of payments is based on the first relevant business day based on standard business practices	> CLECs DISAGREE IN PART AND AGREE IN PART. CLECs disagree with the elimination of penalties for incomplete reporting. CLECs can agree with the payment terms, but would prefer the modified language to be as follows: or the first business day thereafter, "when the 15 th falls on a non-business day."
6	Reporting 2.9 BellSouth will provide documentation of late and incomplete occurrences during the	Language is applicable to performance measurement data posting as required	> CLECs DISAGREE. If BellSouth does not provide the

Florida Public Service Commission

SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
	reporting month that the data is posted to the website-	by the SQM only and not SEEM	documentation, CLECs have no way of being noticed of that the report's content were incomplete. The omission may not be visibly noticeable.
7	Review of Measurements and Enforcement Mechanisms 3.1 BellSouth will participate in six month annual review cycles starting six months after one year from the date of the Commission order	The review process lasts for several months and a series of six-month review cycles is not feasible Therefore, BellSouth propose an annual review cycle, which may be more manageable for all parties involved	> CLECs AGREE.
8	Modification to Measures Review of Measurements and Enforcement Mechanisms 3.2 BellSouth and the ALECs shall file any proposed revisions to the SEEM plan one month prior to the beginning of each review period	Unnecessary because Commission or Staff will establish schedule	> CLECs DISAGREE. Given the limited CLEC resources, this entry help facilitate required planning to ensure that the comments are prepared in a timely manner.
9	Modification to Measures Review of Measurements and Enforcement Mechanisms 3.3 From time to time, BellSouth may be ordered by the Florida Public Service Commission to modify or amend the SQMs or SEEMs. Nothing will preclude any party from participating in any proceeding involving BellSouth's SQMs or SEEMs from advocating that those measures be modified	Superfluous	> CLECs DISAGREE. This language is essential. This language provides the Staff with the flexibility to exercise its authority recommend changes outside the proposed annual review process such BellSouth's performance dictate.
10	Enforcement Mechanisms Definitions 4.1.1 Enforcement Measurement Elements – performance measurements identified as SEEM measurements within the SEEM in this pPlan	Correction to reflect removal of SEEM submetric identification from SQM	> CLECs DISAGREE. CLECs need clarification and do not understand the proposed change.
11	Enforcement Mechanisms Definitions 4.1.2 Enforcement Measurement Benchmark compliance – competitive-level of performance established by the Commission used to evaluate the performance of BellSouth and each ALEC for CLECs for penalties where no analogous retail process, product or service is feasible	Clarification and correction	> CLECS DISAGREE. The language should remain unchanged given that the need to have a formal, agreed-upon definition of compliance with SEEM.
12	Enforcement Mechanisms Definitions 4.1.3 Enforcement Measurement Retail Analog cCompliance – comparing performance levels provided to BellSouth retail customers with performance levels provided by BellSouth to the CLEC ALEC-customer for penalties-measures where retail analogs apply	Clarification and correction	> CLECS DISAGREE. > The language should remain unchanged given that the need to have a formal, agreed-upon definition of compliance with SEEM.

Florida Public Service Commission SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
13	Enforcement Mechanisms Definitions 4.1.4 <i>Test Statistic and Balancing Critical Value</i> – means by which enforcement will be determined using statistically valid equations. The Test Statistic and Balancing Critical Value properties are set forth in Appendix C, incorporated herein by this reference , Statistical Formulas and Technical Description.	Correction	> CLECs AGREE.
14	Enforcement Mechanisms Definitions Section 4.1.5 Cell - all BellSouth retail ISDN (POTS) services, for residential customers,	Clarification and Correction	CLECs DISAGREE. This change does not represent a clarification or correction. ISDN does represent a different cell level of disaggregation.
15	Enforcement Mechanisms Definitions 4.1.8 <i>Tier-2 Enforcement Mechanisms</i> – assessments paid directly to the Florida Public Service Commission or its designee. Tier 2 Enforcement Mechanisms are triggered by three consecutive monthly failures in Tier 2 enforcement measurement elements in which BellSouth performance is out of compliance or does not meet the benchmarks for the aggregate of all CLEC ALEC data as calculated by BellSouth for a particular Tier-2 Enforcement Measurement Element	Clarification and correction	> CLECs DISAGREE. The proposed change adds confusion to the definition and does not delineate the fact that compliance to be determined at the submetric level. CLECs recommend replacing deleted language with “ of a Tier-2 submetric”
16	Enforcement Mechanisms Definitions 4.1.9 <i>Affiliate</i> – person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 Percent	This term is not used in applying the methodology of the Plan therefore the definition is not needed	> CLECs DISAGREE. The definition should be retained such that a common understanding, pertaining to desingated data should be excluded in determining Tier 1 & Tier 2 compliance. The PSC decision stated that, “We will monitor the BellSouth ALEC affiliate performance metrics results provided each month until an assessment can be made of the data’s relevance and significance. At this time, no use should be made of the affiliate data for determining Tier 1 or Tier 2 compliance.”
17	Enforcement Mechanisms Definitions 4.1.9 Affected Volume – that proportion of the total impacted CLEC volume or CLEC Aggregate volume for which remedies will be paid	New definition required for operation of proposed transaction-based remedy mechanism	> CLECs DISAGREE. The proposed definition is too vague. CLEC recommend the following definition: “the quantity of failed transaction that

Florida Public Service Commission SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
18	Enforcement Mechanisms Definitions 4.1.10 <u>Parity Gap</u> – refers to the incremental departure from a compliant-level of service. <u>This is also referred to as “dift” in Appendix D, Statistical Formulas and Technical Description.</u>	New definition required for operation of proposed transaction-based remedy mechanism	are to be remedied.” > CLECs AGREE IN PART AND DISAGREE IN PART. CLECs agree to inclusion of a definition if this terminology will be used in the plan. CLECs DISAGREE to inclusion of the proposed definition given that there is no mention of “parity gap” in the proposed plan. Without an opportunity to view “parity gap” in the context of the proposal, CLECs are unable to verify the proposed definition. > CLECs AGREE.
19	Enforcement Mechanisms Application 4.2.1 The application of the Tier-1- and Tier-2 Enforcement Mechanisms does not foreclose other legal and regulatory claims and remedies available to each CLEC.	Correction	
20	Enforcement Mechanisms Application 4.2.2 performance and the payment of any Tier-1 or Tier-2 Enforcement Mechanisms shall not be used as evidence that BellSouth has not complied with or has violated any state or federal law or regulation. The payment of any Tier-1 Enforcement Mechanism to a CLEC shall be credited against any liability associated with or related to BellSouth’s service performance. It is not the intent of the Parties that BellSouth be liable for both Tier-2 Enforcement Mechanisms and any other assessments or sanctions imposed by the Commission. CLECs will not oppose any effort by BellSouth to set off Tier-2 Enforcement Mechanisms from any assessment imposed by the Commission. The Enforcement Mechanisms contained in this Plan have been provided by BellSouth on a voluntary basis in order to maintain compliance between BellSouth and each CLEC. As a result, CLECs may not use the existence of this section or any payments of any Tier-1 or Tier-2 Enforcement Mechanisms under this section as evidence that BellSouth has not complied with or has violated any state or federal law or regulation.	These changes are to avoid situations where the CLECs are paid multiple times for problems associated with the same transaction or occurrence. Certainly the purpose of plans like the SEEM plan is not to unduly penalize BellSouth and unjustly enrich the CLECs. Similarly, Tier-2 penalties, which are paid to the Commission, should not represent dual assessments against BellSouth for the same performance related problems. Clarification to remove potential controversy about whether the proposed SEEM can be mandated.	> LEGAL ARGUMENTS TO BE INCLUDED.
21	Enforcement Mechanisms Methodology 4.3.1 All OCNs and ACNAs for individual CLECs will be consolidated for purposes of calculating transaction-based failures	Transaction-based plan rather than a measure-based plan is proposed	>
22	Enforcement Mechanisms Methodology 4.3.1.2 When a measurement has five or more transactions for the CLEC.	Correction	> CLECs AGREE.

Row #	Proposed Change	BST Reasoning	CLEC Response
	calculations will be performed to determine remedies according to the methodology described in the remainder of the document		
23	Enforcement Mechanisms Methodology 4 3 2 Tier-2 Enforcement Mechanisms will be triggered by BellSouth's failure to achieve applicable Enforcement Measurement Compliance or Enforcement Measurement Benchmarks for the State of Florida for given Enforcement Measurement Elements for three consecutive months <u>The based upon the method of calculation is set forth in Appendix D, incorporated herein by this reference Statistical Formulas and Technical Description</u>	Clarification	> CLECs AGREE.
24	Enforcement Mechanisms Methodology 4 3 2 1 Tier- 2 Enforcement Mechanisms apply, for an aggregate of all <u>CLEC ALEC</u> -data generated by BellSouth, on a per <u>measurement transaction basis for a particular Enforcement Measurement Element</u> each Enforcement Mechanism Element for which BellSouth has reported non-compliance	See the discussion for section 4 3 1 3 above concerning the recommended change for Tier 1 from per-measure to a per-transaction based plan	> CLECs DISAGREE.
25	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4 4 1 If BellSouth performance triggers an obligation to pay Tier-1 Enforcement Mechanisms to <u>a CLEC ALEC</u> or an obligation to remit Tier-2 Enforcement Mechanisms to the Commission or its designee, BellSouth shall make payment in the required amount <u>by the 15th day of the second month following the month for which disparate treatment was incurred</u> on the day upon which the final validated SEEM reports are posted on the Performance Measurements Reports website as set forth in Section 2 4 above	Clarification and to ensure consistency	> CLECs DISAGREE. The current language is not vague and eliminates the fixed time frame. The proposed change permits BellSouth to provide payments beyond the 45 day interval.
26	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4 4 2 For each day after the due date that BellSouth fails to pay <u>a CLEC ALEC</u> the required amount, BellSouth will pay the <u>CLEC ALEC</u> 6% simple interest per annum	Correction	> CLECs AGREE.
27	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4 4 3 For each day after the due date that BellSouth fails to pay the Tier-2 Enforcement Mechanisms, BellSouth will pay the Commission an additional \$1,000 per day		> CLECs AGREE.
28	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4.4.4 within sixty (60) days after the <u>payment due date</u> of the performance measurement report for which the obligation arose within thirty (30) days after its findings along with 6Percent% simple interest per annum However, the <u>ALEC</u> shall be responsible for all administrative costs associated with resolution of disputes that result in no actual payment Administrative costs are those reasonable costs incurred in the resolution of the disputed matter Such costs would include, but not be limited to, postage, travel and lodging, communication expenses, and legal costs If BellSouth and the <u>ALEC</u> have exhausted good faith negotiations and are still unable to reach a mutually agreeable settlement pertaining to the amount disputed, the Commission will settle the dispute If Commission intervention is required, a mediated resolution will be pursued	Clarification and correction	> CLECs DISAGREE. 1. Elimination of "payment due" did not require clarification. The PSC Order reflected that the claim should be submitted 60 days after the payment due date. 2. Addition of language "of the performance measurement report for which the obligation arose" basically reduces the time allotted to CLECs for amassing the level of details to substantiate their claims. 3. BellSouth provides no substantiation for deletion of the

Florida Public Service Commission SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
29	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4 4 5 At the end of each calendar year, an independent accounting firm, mutually agreeable to the Florida Public Service Commission and BellSouth, shall certify that all penalties under that the results of all penalties under Tier 1 and Tier 2 Enforcement Mechanisms were paid and accounted for in accordance with Generally Accepted Accounting Principles (GAAP). These annual audits shall be performed based upon audited data of BellSouth's performance measurements. For Tier-2 Enforcement Mechanisms, if the Commission requests clarification of an amount paid, a written claim shall be submitted to BellSouth within sixty (60) days after the date of the performance measurement report for which the obligation arose. BellSouth shall investigate all claims and provide the Commission written findings within thirty (30) days after receipt of the claim. If BellSouth determines the Commission is owed additional amounts, BellSouth shall pay such additional amounts within thirty (30) days after its findings along with 6% simple interest per annum.	The deleted portion is covered to the extent necessary by revised audit provisions. The Audit Policy is provided herein as section 4 8 Correct oversight by adding procedure to address clarification requests for Tier 2 by the Commission, which already exists for Tier 1 for CLECs	remaining language. Deletion of this language limits CLEC escalation options. > CLECs DISAGREE. 1. First, the CLECs do not agree with the proposed audit policy. Second, the Audit Policy, as described in section 4.8, make no mention of the Audit Policy including tasks represented in the language marked for deletion. 2. CLECs DISAGREE. The claim process should be consistent between the PSC and CLECs.
30	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4.4.6 BellSouth may set off any SEEM payments to a CLEC against undisputed amounts owed by a CLEC to BellSouth pursuant to the Interconnection Agreement between the parties which have not been paid to BellSouth within ninety (90) days past the Bill Due Date as set forth in the Billing Attachment of the Interconnection Agreement.	Prevent unreasonable situation where BellSouth is paying SEEM to a CLEC who is not paying an undisputed bill	> CLECs DISAGREE. Given that there is not even a consistent view between BellSouth and CLECs on what constitutes an "undisputed amount", CLECs are opposed to any offsets of SEEM payments with outstanding amounts that BellSouth view to be due to BellSouth from the CLEC. Additionally, if a bill is not being paid, it is clearly disputed.
31	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4 4 7 Any adjustments for underpayment or overpayment of calculated Tier 1 and Tier 2 remedies will be made consistent with the terms of BellSouth's Policy On Reposting Of Performance Data and Recalculation of SEEM Payments, as set forth in Appendix G of this document.	This provision is provided to formalize the incorporation of the Reposting Policy	> CLECs DISAGREE. There are circumstances, other than those triggered by the Reposting Policy, that could necessitate the issuance of an adjustment. Adjustment, unrelated to the Reposting Policy, should not be prohibited due to this proposed language. Additionally, the Reposting Policy is already formalized by being an existing section of the

Florida Public Service Commission

SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
32	Enforcement Mechanisms Payment of Tier-1 and Tier-2 Amounts 4.4.8 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 final paid dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.	Clarify by stating current practice used to make adjustments and address CLEC questions	SEEM plan. > CLECs DISAGREE. The proposed process for handling adjustment questions is currently ineffective. CLECs have consistently not been able to acquire the level of detail to understand or gain knowledge of the source of adjustments by using the "normal process used to address CLEC questions related to SEEM payments."
33	Enforcement Mechanisms Limitations of Liability 4.5.1 BellSouth's total liability for the payment of Tier 1 and Tier 2 Enforcement Mechanisms shall be collectively and absolutely capped at 39 % of net revenues in Florida, based upon the most recently reported ARMIS data.	Addressed in new Section 4.7 entitled "Enforcement Mechanism Cap "	> CLECs DISAGREE. BellSouth has provided no substantiation for reducing the "Enforcement Mechanism Cap." BellSouth has provided no rationale that would cause a different determination than the 39 % ordered by this Commission
34	Enforcement Mechanisms Limitation of Liability 4.5.2 BellSouth will not be obligated to pay Tier-1 or Tier-2 if such noncompliance results from failure to follow established and documented procedures	Clarifies current provisions by stating additional specific instances where BellSouth should not be obligated to pay SEEM	> CLECs DISAGREE. The language, "failure to follow established and documented procedures", is very broad. Therefore, the rationale provided by BellSouth does not address the proposed change.
35	Enforcement Mechanisms Limitations of Liability 4.5.3 BellSouth shall not be obligated for Tier 1 or Tier 2 Enforcement Mechanisms for noncompliance with a performance measure if such non-compliance was the result of an act or omission by a CLEC that was in bad faith	Covered in revised Section 4.5.2	> CLECs AGREE.
36	Enforcement Mechanisms Limitations of Liability 4.5.4 a Force Majeure event (as defined in the most recent version of BellSouth's standard Interconnection Agreement)	Clarification by identifying the specific source of the definition of a Force Majeure event	> LEGAL LANGUAGE TO BE INCLUDED.
37	Enforcement Mechanisms Affiliate Reporting 4.6 Affiliate Reporting Change of Law	This is a new section that uses the section number previously designated for Affiliate Reporting	> LEGAL LANGUAGE TO BE INCLUDED.
38	Enforcement Mechanisms Affiliate Reporting Change of Law 4.6.1 Upon a particular Commission's issuance of an Order pertaining to Performance Measurements or Remedy Plans in a proceeding expressly applicable to all CLECs,	The Affiliate Reporting section is eliminated because it is irrelevant for SEEM. That is, this provision is unnecessary to determine whether BellSouth provides nondiscriminatory	> LEGAL LANGUAGE TO BE INCLUDED.

Florida Public Service Commission

SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
	<u>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 obligation 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 will 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 at http://pmap.bellsouth.com. Should there be any difference between the performance measure 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.</u>	access The standards for nondiscriminatory access are defined for each metric in the SQM Adds specific provision to address how changes of law will be handled in SEEM This provision represents a reasonable balance between providing adequate notice that payments will cease with prompt relief for BellSouth to discontinue payments that should no longer be required	
40	Affiliate Reporting Enforcement Mechanism Cap BellSouth shall provide monthly results for each metric for each BellSouth-ALEC affiliate, however, only the Florida Public Service Commission shall be provided the number of transactions or observations for BellSouth-ALEC affiliates. Further, BellSouth shall inform the Commission of any changes regarding non-ALEC affiliates' use of its OSS databases, systems, and interfaces. 4 7 Add Section Enforcement Mechanism Cap	Separates provisions related to the Enforcement Mechanism Cap into its own section Formerly, this information was reflected in section 4 5 1	> CLECs DISAGREE. BellSouth's reasoning does not address the deletion of the Affiliate Reporting section. Therefore, no rationale has been stated to revisit the Commission's decision on Affiliate Reporting.
41	Audits 4 8 - 4 8 1 Add new section Audits	Incorporates a more thorough audit plan into SEEM Having all parties share in the cost provides equal incentive to limit the scope of the audit to meaningful activities	> CLECs DISAGREE. BellSouth has not provided any rationale to justify changing auditing provisions ordered by this Commission. BellSouth should continue to audit its PMQAP and the performance data BellSouth Additionally, BellSouth is obligated to provide compliant performance and uses its performance reporting as evidence of its performance. Therefore, BellSouth should continue to incur the cost of the audit since it's required for BellSouth's purposes. CLECs AGREE.
42	Dispute Resolution 4 74 9 Notwithstanding any other provision of the Interconnection Agreement between BellSouth and each CLEC/ALEC, any dispute regarding BellSouth's performance or obligations pursuant to this Plan shall be resolved by the Commission	Correction	
43	Regional and State Coefficients Section 4 10	Provided for completeness of	> CLECs AGREE IN PART

Florida Public Service Commission SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
		documentation Describes method currently used to apportion penalties calculated for regional measures and modified based on the proposed change from a measurement-based plan to a transaction-based plan	AND DISAGREE IN PART. The CLECs agree to the inclusion of an explanation for Regional & State Coefficients. CLECs disagree with the referenced methodology for calculating coefficients. The description of the methodology appears to be flawed. BellSouth clarify the methodology during the next workshop.
44	Fee Schedule Liquidated Damages for Tier-2 Measures Table 2 Appendix A, Table A 2, reflects the current and proposed changes to the Fee Schedule See Redlined SEEM plan, Exhibit B, for proposed changes	Same rationale as for Table 1 above See Attachment 1 to this exhibit for the rationale for changes in specific fees	> LEGAL LANGUAGE TO BE INCLUDED.
45	SEEM Sub-metrics Applicable to all SEEM sub-metrics Tables B-1 and B-2 General approach taken to set of measures included in plan	Generally, one measure of timeliness and one measure of accuracy should apply to each major domain, e g , Ordering, Provisioning, Maintenance & Repair, etc In addition to the specific reasons given below, BellSouth is proposing to move closer to this general concept with the following changes Also, measures of some intermediate processes were removed because such process may have little if any customer effect and any significant customer effect would likely be reflected in other measures	> CLECs DISAGREE. CLECs need clarification of the specific rationale associated with the deletion of each individual metric since the BellSouth reasoning is not applicable to each deleted metric. CLECs do not agree to deleting metrics that BellSouth is failing or that have not been implemented as ordered.
46	SEEM Sub-metrics Measure OSS-1 Table B-2 Tier 2 Sub-metrics Remove measure OSS-1, Average Response Interval and Percent within Interval (Pre-Ordering/Ordering), from Tier 2 of the SEEM plan	BellSouth proposed removal of this measure from the SQM See SQM matrix filed on July 28, 2004 for the rationale	> CLECs DISAGREE. See CLEC SQM matrix filed on August 18, 2004 for rationale.
47	SEEM Sub-metrics Measure OSS-4 Table B-2 Tier 2 Sub-metrics Remove measure OSS-4, Response Interval (Maintenance & Repair), from Tier 2 of the SEEM plan	BellSouth proposed removal of this measure from the SQM See SQM matrix filed on July 28, 2004 for the rationale	> CLECs DISAGREE. > See CLEC SQM matrix filed on August 18, 2004 for rationale
48	SEEM Sub-metrics Measure PO-1 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics	BellSouth proposed removal of this measure from the SQM See SQM matrix filed on July 28, 2004 for the	> CLECs DISAGREE. > See CLEC SQM matrix filed on August 18, 2004 for

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SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
	Remove measure PO-1, Loop Makeup –Response Time-Manual, from Tier 1 and Tier 2 of the SEEM plan	rationale	rationale
49	SEEM Sub-metrics Measure O-1 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure O-1, Acknowledgement Message Timeliness from Tier 1 and Tier 2 of the SEEM plan	BellSouth proposed removal of this measure from the SQM See SQM matrix filed on July 28, 2004 for the rationale	> CLECs DISAGREE. See CLEC SQM matrix filed on August 18, 2004 for rationale.
50	SEEM Sub-metrics Measure O-2 (AKC) Table B-1 Tier 1 Sub-metrics Remove measure O-2, Acknowledgement Message Completeness, from Tier 1 of the SEEM plan This measure would apply to Tier 2 only	Measure O-2 tracks whether an acknowledgement is returned to the CLECs after an LSR or transmission is electronically submitted. If acknowledgments are not being sent, it does not directly affect the CLECs ability to provide service to its customer but is a secondary measure of an intermediate process. As such, intermittent deficiencies, particularly with the high benchmark do not indicate a significant problem. Consequently, penalties should only apply if there are persistent problems in this area, which is the situation that Tier 2 was designed to address. Also, this measure captures performance related to an electronic process that uses regional systems, problems that occur. Are not limited to individual CLECs, as intended when Tier 1 penalties apply. Further the nature of electronic systems usually makes this problem largely self-correcting and any harm that occurs affects the industry as a whole not an individual CLEC. Therefore, this measure should be included in Tier 2 only. If BellSouth's performance for a given month triggers the Low Performance Fee Schedule, BellSouth will pay Tier 1 penalties in addition to Tier 2 penalty for the month involved.	> CLECs DISAGREE. CLECs see no reason to eliminate Tier 1 remedies as the loss of orders at this initial state creates burdens for CLECs and potential problems meeting customer requirements for service delivery. Therefore, an aggregate-only view will conceal a CLEC-specific problem.
51	SEEM Sub-metrics Measures O-3 & O-4, (PFT)	BellSouth, in its current proposal, recommends that measures O-3,	> CLECs DISAGREE. CLECs oppose losing the deleted

Florida Public Service Commission SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
	Table B-1 Tier 1 Sub-metrics BellSouth recommended combining measure O-4, Flow-Through Service Requests (Detail), with measure O-3, Flow-Through Service Request (Summary) Thus, measure O-4 would no longer exist as a separate measure and measure O-3, as modified, would only apply to Tier 2, Tier 1 would <u>not</u> apply Also change disaggregation for this measure as follows 1 Combine Residence and Business into Resale 2 Combine UNE Loop & Port Combo and UNE Other into UNE The resulting disaggregation would be Resale, UNE and LNP	<i>Percent Flow-Through Service Requests (Summary)</i>, and <i>O-4, Percent Flow-Through Service Requests (Detail)</i> 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 Flow Through results are based on the operation of regional systems and impact CLECs equally, based on the products or feature that they order Because this measure captures performance related to an electronic process that uses regional systems, problems that occur are not limited to individual CLECs, as intended when Tier 1 penalties apply Flow through typically only increase the standard for measuring FOC timeliness by 7 hours The mechanized FOC Timeliness standard is 95% in 3 hours and for orders that do not flow through and should do so, the FOC Timeliness standard is 95% in 10 hours Such delay periodically does not directly affect the CLECs ability to provide service to its customers As such, intermittent deficiencies, particularly with the high benchmark do not indicate a significant problem Consequently, penalties should only apply if there are persistent problems in this area, which is the situation that Tier 2 was designed to address Further, the nature of electronic systems usually makes this problem largely self-correcting and any harm that occurs affects the industry as a	disaggregation in SEEM as problems with flow through for certain problems would go hidden and un-remedied if combined with a large-volume product with high flow-through rates. With so many product types lumped together, masking of CLEC-specific flowthrough problems would easily occur without sanction based on BellSouth's proposal. BellSouth's claims of "regional systems" does not negate the fact that flowthrough varies depending on what is ordered. CLECs disagree with BellSouth's proposed disaggregation. See CLEC August 18, 2004 response to collapsing disaggregation.

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Row #	Proposed Change	BST Reasoning	CLEC Response
52	SEEM Sub-metrics Measure O-8, (RI) Table B-1 Tier 1 Sub-metrics Remove Partially Mechanized and Non-Mechanized disaggregations for O-8, Reject Interval, from Tier 1 and Tier 2	whole not an individual CLEC Therefore, this measure should be included in Tier 2 only Finally, since all CLECs are affected similarly, Tier 1 penalties should not apply. If BellSouth's performance for a given month triggers the Low Performance Fee Schedule, BellSouth will pay Tier 1 penalties in addition to Tier 2 penalty for the month involved. The proposed disaggregation for this measure in the SEEM plan is the same as the SQM. See the SQM matrix filed on July 28, 2004 for the rationale for this change. BellSouth's Proposed SQM disaggregates the Reject Interval measurement by 3 methods of submission – fully mechanized, partially mechanized and non-mechanized (manual). For an effective enforcement plan, however, only the fully mechanized portion of this measurement should be included since this is the method of submission where the preponderance of CLEC activity occurs. Also, such treatment provides a further incentive for CLECs to move to electronic system that BellSouth has expended huge resources to develop and maintain at the CLECs request. Finally, partially mechanized and non-mechanized methods of submission are subject to gaming by the CLECs. LSRs can effectively be submitted with known errors in such a way as to guarantee a penalty payment. This measure was proposed for removal from the SQM. See the SQM	> CLECs DISAGREE. All product types can not be ordered via a fully mechanized means. However, these CLECs also cannot tolerate long reject interval and this metric disaggregation should continue to include partially mechanized and non-mechanized. > CLECs DISAGREE. Contrary to BellSouth's
53	SEEM Sub-metrics Measure O-9, (FOCT)		

Florida Public Service Commission SEEM Non-Technical Matrix

Row #	Proposed Change	BST Reasoning	CLEC Response
	Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure O-9, Firm Order Confirmation (FOC) Timeliness, from the both Tier 1 and Tier2	matrix filed on July 28, 2004 for the rationale. It should be noted that although this measure is being removed from SEEM, this function will still be measured in the new measurement <i>Firm Order Confirmation Average Completion Interval</i> (FOCI) that BellSouth is proposing to include in both Tier 1 and Tier 2 of SEEM. The FOCI measure will combine the two current measures, <i>FOC Timeliness</i> and <i>Average Completion Interval</i> (OCI) & <i>Order Completion Interval</i> . Distribution, into a single metric as requested by CLECs in the past. Since the failure to return FOCs to CLECs in a timely manner will show up in the FOCI metric, which is proposed for both Tier 1 and Tier 2, including <i>FOC Timeliness</i> in the SEEM plan as well would result in dual penalties for the same failure. Therefore, BellSouth's proposal excludes <i>FOC Timeliness</i> from the SEEM plan.	CLEC Response comments, BellSouth did not propose for removal of this measure from the SQM. The CLEC do not agree that the FOCI measure is appropriately structured. The artificial padding of intervals that include ILEC "FOC" times render this measure completely useless for monitoring for discrimination. See CLEC comments filed on August 18, 2004. Therefore, the FOC should be retained as a Tier 1 & Tier 2 measure.
54	SEEM Sub-metrics Measure O-11, (FOCRC) Table B-1 Tier 1 Sub-metrics Remove measure O-11, Firm Order Confirmation and Reject Response Completeness, from Tier 1 of SEEM	BellSouth's proposal excludes this measure from Tier 1 of the SEEM plan and includes it as a Tier 2 measure only. This is not a primary indicator of the timeliness or accuracy of the ordering process. The systems and processes that generate Reject Notices and FOCs are regional in nature and this measure simply tracks whether one of these two responses to a request was sent – not how long it takes to send it. If a response is not sent it is typically due to a system problem, which affects CLECs in general rather than only specific CLECs. Further the cure is fairly	> CLECs DISAGREE. CLECs oppose removal of Tier 1 remedies. BellSouth has not explained why missing FOCs and Rejects do not harm CLECs' individual relationships with customers.

Row #	Proposed Change	BST Reasoning	CLEC Response
		simple, which is for the CLEC to resubmit the order. Consequently this area becomes a problem only if persistent problems arise, which makes it more appropriate to include this measure in Tier 2 only. Further, Tier 1 penalties are already paid, and would be paid under BellSouth's proposal, for the Reject Interval and FOCI measures. Further, if BellSouth's performance for a given month triggers the Low Performance Fee Schedule, BellSouth will pay Tier 1 penalties in addition to Tier 2 penalty for the month involved.	
55	SEEM Sub-metrics Measure P-4 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure P-4, Average Completion Interval (OCI) & Order Completion Interval Distribution, from Tier 1 and Tier 2 of the SEEM plan	Although this measure is being removed from SEEM, this function will still be measured in the new measurement <i>Firm Order Confirmation Average Completion Interval</i> (FOCI) that BellSouth is proposing to include in both Tier 1 and Tier 2 of SEEM. The FOCI measure will combine the two current measures, <i>FOC Timeliness</i> and <i>Average Completion Interval (OCI) & Order Completion Interval Distribution</i> , into a single metric as requested by the CLECs in the past. Since the failure to complete orders within appropriate intervals will show up in the FOCI metric, which is proposed for both Tier 1 and Tier 2, including a separate OCI measure in the SEEM plan as well would result in dual penalties for the same failure.	> CLECs DISAGREE. This is a key measure and one where CLECs currently track BellSouth's performance. The CLEC do not agree that the FOCI measure is appropriately structured. The artificial padding of intervals that include ILEC "FOC" times render this measure completely useless for monitoring for discrimination. See CLEC comments filed on August 18, 2004. Therefore, the OCI should be retained as a Tier 1 & Tier 2 measure.
56	SEEM Sub-metrics New Measure, FOCI Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Add the measure Firm Order Confirmation Average Completion Interval to both Tier 1 and Tier 2 of SEEM	New measure that combines former measures FOC Timeliness and Average Completion Interval. These two functions are proposed to be in SEEM.	> CLECs DISAGREE. CLEC oppose is measure as a replacement for OCI Tier 1 and Tier 2 measures. See CLEC concerns in August 18, 2004.

Row #	Proposed Change	BST Reasoning	CLEC Response
57	SEEM Sub-metrics Measure P-7A, HCT Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Combine the existing disaggregation levels for measure P-7A, Coordinated Customer Conversions Hot Cut Timeliness – Percent within Interval, into single a single sub-metric for “UNE Loops ”	The proposed SQM reflects two levels of disaggregation for this measure, namely “Non-IDLC” and “IDLC ” See the SQM matrix filed on July 28, 2004 for the rationale for that change For purposes of the SEEM plan, while the proposed disaggregation for this metric in SEEM only reflects one category for “UNE Loops,” the calculations for penalties actually applies the separate benchmarks for Non-IDLC and IDLC Loops The penalties would simply be reported as a single category designated as UNE Loops	> filing. CLEC Response
58	SEEM Sub-metrics Measure P-7C, (PT) Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure P-7C, Hot Cut Conversions - Percent Provisioning Troubles Received within 5 Days (formerly 7 Days) of a Completed Service Order, from Tier 1 and Tier 2	BellSouth's proposal excludes this measure from Tier 1 and Tier 2 of SEEM This is because the same data are captured in the measure <i>Percent Provisioning Troubles within "X" Days</i> , which is included in Tier 1 and Tier 2 Including both these measures in SEEM would subject BellSouth to dual penalties for the same failure	> CLECs DISAGREE. This metric specifically seeks to motivate compliant hot cut performance. Based on the proposed disaggregation for Percent Troubles within “X” Days, all UNE loop performance would be consolidated and hot cut specific performance would be masked.
59	SEEM Sub-metrics Measure P-8 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure P-8, Cooperative Acceptance Testing, from Tier 1 and Tier 2 of the SEEM plan	BellSouth proposed removal of this measure from the SQM See SQM matrix filed on July 28, 2004 for the rationale	> CLECs DISAGREE. CLECs oppose the deletion of this measure. This measure is a key indicator of support xDSL testing and should not be deleted. It is imperative that CLECs receive trouble-free loops at installation. Further, as facilities-based competition increases, so may the number of orders requiring cooperative testing.
60	SEEM Sub-metrics New measure CNDD Table B-1. Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Add measure CNDD, Non-Coordinated Customer Conversions – Percent Completed and Notified on Due Date, to both Tier 1 and Tier 2	BellSouth proposes to add this new measure to both Tier 1 and Tier 2 of SEEM This measure, as described in the SQM matrix filed on July 28, 2004, captures the percentage of non-	> CLECs AGREE.

Row #	Proposed Change	BST Reasoning	CLEC Response
61	SEEM Sub-metrics Measures P-13B (LOOS), P-13C (LAT), and P-13D (DTNT) Table B-1 Tier 1 Sub-metrics Remove measures P-13B, LNP-Percent Out of Service < 60 Minutes, P-13C, Percentage of Time BellSouth Applies to 10-Digit Trigger Prior to the LNP Order Due Date (LAT), and P-13D, LNP-Disconnect Timeliness (Non Trigger) (DTNT), from Tier 1 of SEEM	coordinated customer conversions that BellSouth completes and provides notification to the CLEC on the due date. Considering the increased role that non coordinated hot cuts may have in the future and the potential direct impact on customer service this measure is being proposed for inclusion in SEEM	> CLECs DISAGREE. CLECs oppose changing these measure to Tier 2 only. As facilities-based competition increases, so may the number of LNP orders. Now is not the time to eliminate incentives for BellSouth to provide compliant support. Secondly, an aggregate view of performance can easily mask poor CLEC-specific performance. BellSouth sometimes seem to act as if the CLECs are one company in viewing the poor performance is only problematic if every CLEC is harmed.
62	SEEM Sub-metrics Measure M&R-2, CTRR Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure M&R 2, Customer Trouble Report Rate, from both Tier 1 and Tier 2	This measure is neither an indicator of timeliness nor accuracy of maintenance and repair. It is not a measure of whether troubles actually exist, but is at best a broad indicator of whether customers choose to submit trouble reports. Consequently, low results do not mean that there is a performance problem, instead it simply provides information that indicates whether a part of the maintenance process needs to be examined to see if a problem exists. Experience has shown that results vary widely due to differences in the	> CLECs DISAGREE. Contrary to BellSouth's comments, CTRR is an indicator of the percentage of wholesale line that experience troubles. Therefore, it gives some indication of CLEC reliability when is an essential attribute for competing in the local market. For the CLECs, low results indicate that CLEC customers are experiencing service disruptions. Maybe the results are not troublesome to BellSouth because these are CLEC

Row #	Proposed Change	BST Reasoning	CLEC Response
		BST Reasoning way that CLECs choose to maintain their services. For example, some CLECs do a better job of isolating troubles to their network than others Those that don't isolate troubles well have higher trouble report rates, and it hardly seems appropriate to penalize BellSouth because a CLEC did not isolate its troubles properly. Also, very small differences in performance result in large penalties for this measure as shown in the examples in our comments. Typically, some of the highest penalties are paid for this measure, and it is typically one of the areas where the measure usually indicates a high level of performance for both CLECs and retail. For example, overall, Trouble reports rate are usually less than 3% and the difference between CLEC and retail performance is less than 2%, but the penalties are among the highest of any measure. This occurs even though for many of the reports no actual trouble exists. SEEM penalties will apply to the measures Maintenance Average Duration and Repeat Troubles, which together measure the accuracy and timeliness of Maintenance and Repair efforts.	customers. CLECs also oppose elimination of this measure from SEEM given their sustained non-compliance.
63	SEEM Sub-metrics Measure M&R-5 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure M&R-5, Out of Service (OOS) > 24 hours, from Tier 1 and Tier 2 of the SEEM plan	BellSouth proposed removal of this measure from the SQM. See SQM matrix filed on July 28, 2004 for rationale.	> CLECs DISAGREE. CLECs opposed removal of this measure from SEEM. See SQM matrix filed on August 18, 2000
64	SEEM Sub-metrics Measure B-1 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics For measure B-1, Invoice Accuracy, change the disaggregation to eliminate separate submetrics for Interconnection, Resale and UNE	This metric is simply an indication of whether BellSouth provides the CLECs with accurate bills. There is no need to show separate disaggregations for Interconnection, Resale and UNE.	> CLECs DISAGREE.
65	SEEM Sub-metrics	BellSouth proposed removal of this	> CLEC DISAGREE.

Row #	Proposed Change	BST Reasoning	CLEC Response
	Measure B-3 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure B-3, Usage Data Delivery Accuracy, from Tier 1 and Tier 2 of the SEEM plan	measure from the SQM. See SQM matrix filed on July 28, 2004 for rationale	CLECs opposed removal of this measure from SEEM. See matrix filed on August 18, 2004.
66	SEEM Sub-metrics Measure B-10 Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Remove measure B-10, Percent Billing Errors Corrected in "X" Business Days, from Tier 1	BellSouth proposed removal of this measure from the SQM. See SQM and Tier 2 of the SEEM plan matrix filed on July 28, 2004 for rationale	> CLECs DISAGREE. CLECs opposed removal of this measure from SEEM. BellSouth is currently failing at the Tier 2 level for this measure. BellSouth's claims of claims having low dollar values is false and attributed to the fact that BellSouth is inappropriately excluded claims that are disputed. Those disputed claims, which happen to be wrongfully excluded, have high dollar value. Therefore, BellSouth has no valid rationale for deleting this measure.
67	SEEM Sub-metrics Measure C-3, PMDD Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics For measure C-3, Collocation Percent of Due Dates Missed, remove the separate disaggregations for Virtual, Physical, which were further disaggregated by Initial and Augment	This metric simply tracked whether a committed due date is met or missed. Specific disaggregation by Virtual or Physical (also Initial and Augment) is unnecessary. This especially true since BellSouth rarely missed a due date for this measure.	>
68	SEEM Sub-metrics SEEM Measurement Disaggregation - General Table B-1 Tier 1 Sub-metrics & Table B-2 Tier 2 Sub-metrics Decrease the level of disaggregation for many SEEM Tier 1 and Tier 2 measurements. The measures within the Provisioning and Maintenance & Repair domains for which BellSouth proposes a reduction in disaggregation are shown below (the actual changes to the level of disaggregation is shown in Appendix B, Tables B-1 and B-2, of the redlined SEEM plan included in this filing as Exhibit B) <u>Provisioning</u> 1. PLAM Percent Installation Appointments Met (currently reflected as P-3, Percent Missed Installation Appointments) 2. PPT Percent Provisioning Troubles within 5 Days (previously 30 Days) of Service Order Completion <u>Maintenance & Repair</u>	As discussed concerning the excessive disaggregation in the current SQM, there are a large number of sub-metrics for which there is little or no activity month-to-month. There is, obviously, no benefit to maintaining the current level of disaggregation, which produces so many meaningless data reports. The resulting need, therefore, and the approach reflected in BellSouth's proposal, is for more aggregation rather than disaggregation. That is, grouping similar sub-metrics together for	> CLECs DISAGREE. CLECs do not agree with compensating accuracy of the compliance determination for the sake of increasing volumes at the submetric level. CLECs continue to reiterate the fallacy of lumping unlike products together for performance determination. This course of action will only produce flawed results. To address BellSouth concerns, CLECs continue to recommend a joint viewing of data at the cell

Row #	Proposed Change	BST Reasoning	CLEC Response
1	PRAM Percent Repair Appointments Met (currently reflected as MR-1, Percent Missed Repair Appointments)	purposes of making more meaningful determinations of compliant performance	level such that a joint disaggregation proposal can be developed. BellSouth continues to make these claims of low volumes but have not provided other parties with access to the data to verify or invalidate those claims.
2	MAD Maintenance Average Duration		
3	PRT Percent Repeat Customer Troubles within 30 Days		
	The proposed SEEM disaggregation for Pre-Ordering and Ordering measures is the same as the proposed SQM disaggregation except where already noted	Beyond the disaggregation issues associated with the SQM, however, the design and intended functioning of the SEEM plan requires additional aggregation beyond that reflected in the SQM. Of course, the problem of the vast majority of sub-measures reflecting little or no activity is compounded in the SEEM plan for Tier 1. This is because in addition to the several levels of disaggregation in the SQM, SEEM Tier 1 calculations require further disaggregation by individual CLEC. Specifically, SEEM currently contains 830 sub-metrics at the Tier 1 level. There are over 200 CLECs in Florida. Since Tier 1 sub-metrics apply to all CLECs, there is a potential for over 166,000 SEEM determinations (830 sub-metrics x 200 CLECs). Too many sub-metrics (which are subject to further disaggregation and granularity) result in few or no transactions (or activity) in many sub-metrics. For example, an analysis of SEEM data for Florida taken from the three-month period of August through October 2003 indicated that, on average, there was no activity for 97% of the CLEC specific opportunities for the 830 SEEM measures	
		Additionally, the truncated-Z statistical methodology uses like-to-like comparisons at very granular level called cells so masking of poor performance by good performance is a minimal problem if it exists at all as	

Row #	Proposed Change	BST Reasoning	CLEC Response
		indicated by an analysis conducted by AT&T. The truncated Z methodology was specifically designed to allow aggregation of several products without creating a problem with masking. According to the design of the statistical methodology used in the SEEM plan, given that like-to-like comparisons are made at the cell level, it is unnecessary for the SEEM plan payment categories of sub-metrics to be the same as the SQM level, which is used for reporting and monitoring.	
69	SEEM Sub-metrics SEEM Retail Analog B.3 Add new section to show the retail analogs for the measures in the SEEM plan	Added for completeness of SEEM documentation	>
70	SEEM Sub-metrics SEEM Benchmark Thresholds B.4 Add new section to show the benchmarks for the measures in the SEEM plan	Added for completeness of SEEM documentation	>
71	Appendix F OSS Tables F.1 – F.2 Added the OSS designations to SEEM	This section was added to reflect the OSS applied to the SEEM plan parity determinations	>
72	Appendix G Reposting of Performance Data and Recalculation of SEEM Payments Reposting policy added to the SEEM plan	This is the policy concerning the reposting of data that was approved by the Commission. This policy is included in the SEEM plan documentation for completeness	>