BELLSOUTH

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General Counsel

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July 30, 2001

VIA HAND DELIVERY

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

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

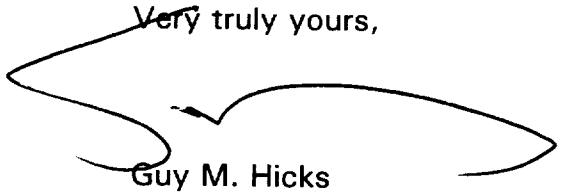
Enclosed are the original, four paper copies, and an electronic version of BellSouth's 271 filing.

The affidavit of Mr. Douglas E. Schaller contains proprietary CLEC-specific information. This proprietary affidavit is being filed with the Authority under separate cover subject to the terms of the Protective Order entered in this proceeding. Based on BellSouth's understanding that certain CLECs object to BellSouth providing this information to other CLECs, even subject to the terms of a protective order, the proprietary version of Mr. Schaller's filing is not being provided by BellSouth to the parties of record. Copes of the redacted, non-proprietary version of Mr. Schaller's filing are enclosed. The electronic version of BellSouth's 271 filing includes the non-proprietary redacted version of Mr. Schaller's filing.

This will also confirm BellSouth's agreement to extend the TRA's 90-day review period consistent with the schedule and hearing dates proposed by BellSouth, which allow for a longer review period. An electronic copy of the

enclosed is being provided to counsel of record. Thank you for your attention to this matter.

Very truly yours,



Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

[ ] Hand [X] Mail [ ] Facsimile [ ] Overnight	H. LaDon Baltimore, Esquire Farrar & Bates 211 Seventh Ave. N, # 320 Nashville, TN 37219-1823
[ ] Hand [X] Mail [ ] Facsimile [ ] Overnight	Charles B. Welch, Esquire Farris, Mathews, et al. 205 Capitol Blvd, #303 Nashville, TN 37219
[ ] Hand [X] Mail [ ] Facsimile [ ] Overnight	Henry Walker, Esquire Boult, Cummings, et al. P. O. Box 198062 Nashville, TN 37219-8062
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[ ] Hand [X] Mail [ ] Facsimile [ ] Overnight	Donald L. Scholes Branstetter, Kilgore, et al. 227 Second Ave., N. Nashville, TN 37219

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[ ] Hand [X] Mail [ ] Facsimile [ ] Overnight	Andrew O. Isar, Esquire ASCENT 3220 Uddenberg Lane, NW Gig Harbor, WA 98335
[ ] Hand [X] Mail [ ] Facsimile [ ] Overnight	Jon E. Hastings, Esquire Boult, Cummings, et al. P. O. Box 198062 Nashville, TN 37219-8062

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF GUSTAVO E. BAMBERGER

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 97-00309

JULY 30, 2001

I. INTRODUCTION.

Q. PLEASE DESCRIBE YOUR BACKGROUND AND QUALIFICATIONS.

A. I am a Senior Vice President of Lexecon Inc., an economics consulting firm that specializes in the application of economics to legal and regulatory issues. I received a B.A. degree from Southwestern at Memphis, and M.B.A. and Ph.D. degrees from the University of Chicago Graduate School of Business. I have previously provided testimony to the Federal Communications Commission and state regulatory bodies on Section 271 issues. In addition, I also have provided expert testimony in federal courts and before the U.S. Senate, the U.S. Federal Energy Regulatory Commission, the U.S. Department of Transportation, the U.S. International Trade Commission and state regulatory agencies. My curriculum vitae, which lists my testimonial experience, is attached as Exhibit A.

Q. PLEASE EXPLAIN THE PURPOSE OF YOUR TESTIMONY.

A. I have been asked by BellSouth to analyze its performance in the provisioning of certain services to Competitive Local Exchange Carriers (“CLECs”) in Tennessee

during May 2001. BellSouth measures the average number of days that it takes to complete orders received from CLECs in two ways. The first measure, the Order Completion Interval, or OCI, equals the number of days between the date an order from a CLEC is first assigned a valid order number and the date on which it is completed. The second measure is known as Total Service Order Cycle Time, or TSOCT. The TSOCT for an order equals the number of days between the date a valid order from a CLEC is received and the date on which it is completed.[1] The difference between these two measures equals the number of days between (1) the date on which the CLEC local service request is received; and (2) the date on which it is assigned a valid order number.

Q. PLEASE DESCRIBE YOUR ANALYSIS.

A. I have analyzed BellSouth's performance in two ways. First, I analyze the extent to which BellSouth's reported performance is affected by factors outside of BellSouth's control. Second, I compare BellSouth's performance on CLEC orders to the "target intervals" set for each type of service. Target intervals are reported in BellSouth Products & Services Interval Guides, Issue 4B.[2]

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS.

[1] For a few of the performance measures I analyze, OCI and TSOCT equal the number of days from the appropriate start date to the date the order is completed excluding Sundays and holidays. I understand that these performance measures are maintained on a data base known as "Barney," while the other measures I analyze are maintained on a data base known as "PMAP." I understand that beginning with the performance measures reported for June 2001, all reported average OCIs and TSOCTs will exclude Sundays and holidays.

[2] Target intervals are specified for OCI and TSOCT for most types of CLEC orders. For orders that specify 15 or more circuits, target intervals are negotiated between BellSouth and the CLEC placing the order. I exclude these orders from my analyses.

A. As I explain in this testimony: (1) the failure to properly “L code” certain orders; and (2) missed appointments due to an end user, explain most or all of what appear to be BellSouth’s performance failures. I find that BellSouth’s reported performance on CLEC orders typically appears to be worse than its performance on retail orders for the performance measures I analyze. I also find that the data appear to indicate that BellSouth fails to complete CLEC orders within target intervals. However, based on my analysis of the data underlying these measures, I conclude that BellSouth’s apparent performance on CLEC orders is made substantially worse by factors outside of BellSouth’s control.

II. INFORMATION USED TO CALCULATE OCI AND TSOCT.

Q. PLEASE DESCRIBE THE TYPE OF INFORMATION THAT YOUR ANALYSIS IS BASED UPON.

A. I was provided with information for all retail and CLEC orders in the state of Tennessee for a variety of services for the month of May 2001. In particular, I was provided with detailed information for the orders underlying a total of 35 OCI and 29 TSOCT performance measures. The OCI performance measures included in my analysis are listed in Table 1A; the TSOCT measures are listed in Table 1B. Each order type has an associated target interval. For example, for a “residential, one or two circuits, dispatch” order, the target OCI is two days, and the target TSOCT is two to three days (depending on whether the order is

received before or after 10 A.M.).[3] The target intervals associated with the performance measures in my analysis are reported in Tables 2A and 2B.

Q. PLEASE EXPLAIN WHAT YOU MEAN BY AN "L CODED" ORDER.

A. Each order from a CLEC includes a customer-requested due date, which indicates when the customer wants the order filled. A customer may request that an order be completed after the date implied by the target interval.[4] I understand that such orders should receive an "appointment code" with the value "L", and "L coded" orders are excluded from the calculation of average OCIs and TSOCTs. However, as I discuss in more detail later in this testimony, I also understand – and my analysis confirms – that many such CLEC orders fail to be "L coded" and therefore are incorrectly included in average OCI and TSOCT calculations.[5]

Q. SUPPOSE THAT A CLEC REQUESTS THAT AN ORDER BE COMPLETED IN LESS TIME THAN THE TARGET OCI. HOW DO YOU TREAT SUCH ORDERS IN YOUR ANALYSIS?

[3] For some orders, I cannot calculate a target interval because the time at which the order was received is not available. I exclude these orders from my analysis.

[4] I understand that CLEC orders that were processed through BellSouth's "EDI" interface sometimes were assigned incorrect customer-requested due dates (that is, the reported customer-requested due date may not have been requested by the CLEC). For this reason, I assume that none of the CLEC orders received via EDI should have been L coded.

[5] To determine whether an order that is not L coded should have been, I compare the target OCI for that order with the number of days – excluding Sundays and holidays – between the date the order is first assigned a valid order number and the customer-requested due date. For example, if the target OCI for an order issued on May 8, 2001 were seven days, and the customer-requested due date for that order were May 16, 2001, I would not classify that order as one that should have been L coded because there were seven days (excluding Sundays and holidays) between May 8 and May 16 (May 13, 2001 was a Sunday).

A. I understand that if BellSouth accepts such an order, then it has committed to complete the order by the date requested by the customer. (However, I understand that BellSouth is not required to accept these orders.) For example, suppose that a customer placed an order on May 8 that had a target OCI of two days, but would like for the order to be completed by May 9 (i.e., in one day). I understand that if BellSouth accepts the order, then it has committed to complete the order by May 9 and the customer-requested due date on the order is set to May 9. In these circumstances, I understand that orders completed after May 9 but within the target OCI are considered late – for example, if BellSouth completed the order on May 10 (i.e., within the target OCI, but after the customer-requested due date), the order would be treated as if it were completed one day late. For this reason, on orders where BellSouth commits to a customer-requested due date that is earlier than that implied by the target OCI, I change the target OCI for that order to equal the number of days between the issue date and the customer-requested due date.[6] In the example in this paragraph, I would set the target OCI for the order to one day.

Q. DO YOU EVER INCREASE THE TARGET INTERVAL?

A. Yes. For some orders contained in the PMAP database, I increase the target interval. For example, suppose that an order with a target interval of seven days is received on May 8, 2001, with a customer-requested due date of May 16, 2001. As I have discussed, because there are only seven business days

[6] I also change the target TSOCT by reducing it by the same number of days as I reduce the target OCI. For example, if the target OCI for an order is two days and its target TSOCT is three days, then for orders where I reduce the target OCI from two days to one day, I reduce the target TSOCT from three to two days.

between May 8 and May 16, this order is not L coded. However, because Sundays and holidays are counted when OCIs are measured, the OCI for this order (if it is completed on May 16) is eight days. If the OCI is compared to the target interval, this order would appear to be one day "late," even though the customer received service on the day requested. For this reason, I increase the target intervals for these orders to reflect the number of Sundays and holidays between the order date and the customer-requested due date. For example, for the order received on May 8, 2001 with a customer-requested due date of May 16, 2001, I change the target OCI to eight days (from seven).

Q. CAN FACTORS OUTSIDE OF BELLSOUTH'S CONTROL RESULT IN OCIS AND TSOCTS THAT ARE LONGER THAN TARGET INTERVALS?

A. Yes. On orders that should have been L coded but were not, the OCIs and TSOCTs typically will exceed the target intervals because of customer requests. Some orders are not completed by the date implied by the target OCI (or the date requested by the customer) because of a "missed appointment" attributable to the end user.[7] (Missed appointments attributable to end users are not included in the reported TSOCT calculations.)

Q. PLEASE DESCRIBE HOW YOU ANALYZE ORDERS THAT SHOULD HAVE BEEN L CODED.

[7] I determine whether a missed appointment is attributable to an end user or to BellSouth from a "missed appointment code" included in the data base I received from BellSouth.

A. For orders that should have been L coded but were not, I define a “requested extra interval” as the number of days between the completion date implied by the target OCI and the customer-requested due date. For example, suppose that an order issued on May 8, 2001 had a target OCI of two days, so that the completion date implied by the target OCI is May 10, 2001. If the order has a customer-requested due date of May 11, 2001, the requested extra interval for that order is one day.

Q. PLEASE DESCRIBE HOW YOU ANALYZE ORDERS WITH MISSED APPOINTMENTS ATTRIBUTABLE TO END USERS.

A. For missed appointments attributable to end users, I define a “customer missed appointment interval” as the number of days between the order’s due date and the date on which the order was actually completed. For example, suppose that an order issued on May 8 had a customer-requested due date of May 11. If, instead, the order is not completed on May 11 because of a missed appointment attributable to the end user, and is instead completed on May 18, I treat the extra seven days between May 11 and May 18 as a customer missed appointment interval. (If, however, the missed appointment had been attributable to BellSouth, the order would be seven days “late.”)

Q. HOW DO YOU TREAT ORDERS THAT ARE AFFECTED BY BOTH OF THESE ISSUES?

A. Suppose that an order issued on May 8 has a target interval of two days and a customer-requested due date of May 11, but was not completed until May 18 because of a missed end user appointment. Then the requested extra interval is one day (i.e., from May 10 to 11), and the customer missed appointment interval is seven days (i.e., from May 11 to 18).

III. ANALYSIS OF OCI AND TSOCT.

Q. HOW MANY PERFORMANCE MEASURES DO YOU ANALYZE?

A. For some performance measures, there are only a few CLEC orders. For the purposes of my testimony, I limit my discussion to performance measures with at least 10 orders in a month. There are nine OCI and 22 TSOCT performance measures included in my analysis.

Q. ON THE OCI MEASURES YOU ANALYZE, HOW DID BELLSOUTH'S REPORTED PERFORMANCE ON CLEC ORDERS COMPARE TO ITS PERFORMANCE ON RETAIL ORDERS?

A. For four of the order types, the average OCI for CLEC orders exceeded the average OCI for the corresponding retail orders, by between 0.05 and 1.71 days. However, the average OCI for CLEC orders was less than the average OCI for the corresponding retail orders on five order types. See columns (1) to (3) of Table 3A.[8]

[8] Because I exclude orders for which target interval information is not available (e.g., orders for more than 15

Q. TO WHAT EXTENT WAS BELLSOUTH'S OCI PERFORMANCE ON CLEC ORDERS AFFECTED BY FACTORS BEYOND ITS CONTROL?

A. To determine the impact of these factors on BellSouth's reported performance on CLEC orders, I repeat my analysis after excluding CLEC orders that should have been L coded, and retail and CLEC orders with missed end user appointments.[9] I refer to average performance after these orders are excluded as "adjusted performance." For seven of the nine performance measures, I find that BellSouth's OCI adjusted performance is <u>better</u> on CLEC orders than on retail orders, by 0.43 to 4.67 days. For the remaining two performance measures, the average OCI on CLEC orders is longer than the average OCI on retail orders by 2.14 to 2.37 days. See columns (4) to (6) of Table 3A.

Q. HOW MANY CLEC ORDERS ARE AFFECTED BY FACTORS BEYOND THE CONTROL OF BELLSOUTH?

A. A substantial percentage of CLEC orders "should have been L coded" or are end user missed appointments. For example, for "residential, less than 10 circuits, non-dispatch" orders (A.2.1.1.1.2), the unadjusted performance measure is based on 11,327 orders, but the adjusted performance is based on only 9,271

(...continued)
circuits), the "unadjusted" performance measures I report may differ slightly from the results reported by BellSouth.

[9] I understand that retail orders are automatically L coded when appropriate and thus are excluded from the data underlying my analyses. Thus, I determine whether an order "should have been L coded" only for CLEC orders.

orders (i.e., 81.8 percent of the total). In contrast, 99.8 percent of the retail orders that underlie the unadjusted performance measure are included in the adjusted performance measure (246,128 of 246,712 orders). Table 3B reports the number of orders included in each unadjusted and adjusted performance measure.

Q. TO WHAT EXTENT WAS BELLSOUTH'S TSOCT PERFORMANCE ON CLEC ORDERS AFFECTED BY FACTORS BEYOND ITS CONTROL?

A. There are 22 TSOCT performance measures for which there were at least 10 CLEC orders in May 2001. (Retail analogs are not specified for TSOCT performance measures.) To determine the extent to which BellSouth's relative performance on CLEC TSOCT orders is affected by factors beyond its control, I repeat my analysis after excluding CLEC orders that should have been L coded. The results of this analysis are shown in Tables 4A and 4B. For 20 of the 22 performance measures, BellSouth's adjusted performance is better than its unadjusted performance, by 0.08 to 4.13 days. Of the remaining two measures, unadjusted performance is the same as adjusted performance for one, and only 0.06 days worse for the other. See Table 4A. The number of orders underlying each performance measure is reported in Table 4B.

Q. HOW DO AVERAGE OCIS AND TSOCTS COMPARE TO TARGET INTERVALS?

A. For each of the OCI and 20 of the 22 TSOCT performance measures with at least 10 CLEC orders in my analysis, I find that average OCIs and TSOCTs are

longer than the corresponding average target intervals. However, I find that most or all of this difference typically is explained by factors outside of BellSouth's control. See Tables 5-6.

Q. HOW DO YOU CALCULATE AN AVERAGE TARGET INTERVAL FOR EACH PERFORMANCE MEASURE?

A. As I have discussed, on some occasions BellSouth agrees to accept a CLEC request that an order be completed in less time than the target interval. For these orders, I reduce the target interval (to equal the number of days until the customer-requested due date). For this reason, the average target interval for a performance measure may be less than the reported target interval for those orders. For example, suppose that there are only two orders in a performance measure and both orders have a target interval of two days. If BellSouth accepts a CLEC request to complete one of the orders in one day, I redefine the target interval for that order to one day, and so the average target interval for that performance measure would equal 1.5 days.[10]

Q. PLEASE DESCRIBE YOUR FINDINGS FOR THE OCI PERFORMANCE MEASURES.

A. For all nine performance measures I analyze in May 2001, the average OCI exceeds the average target interval (by 0.24 to 3.88 days). See columns (1) to (3) of Table 5. However, some or all of this difference is explained by extra

[10] As I have discussed, I also increase target intervals on some orders.

requested intervals and customer missed appointment intervals. For example, for “residential, less than 10 circuits, non-dispatch” orders (A.2.1.1.1.2), the average OCI (1.08 days) exceeds the average target interval for the corresponding orders (0.70 days) by 0.38 days. The average extra requested interval on these orders is 0.65 days. Since the gap for this interval was only 0.38 days, all of the difference between average OCI and average target interval for this performance measure is explained by factors outside of BellSouth's control. See columns (4) to (7) of Table 5. All of the entire performance gap is explained by factors outside of BellSouth’s control for five of the nine OCI performance measures in my analysis. For each of the remaining four performance measures, a substantial proportion of the performance gap is explained by factors outside of BellSouth’s control – for example, for “business, less than 10 circuits, dispatch” orders (A.2.1.2.1.1), the difference between the average OCI and the average target OCI is 1.54 days; however, all but 0.38 days (i.e., about 75 percent) of this gap is due to factors beyond BellSouth’s control.

Q. PLEASE DESCRIBE YOUR FINDINGS FOR THE TSOCT PERFORMANCE MEASURES.

A. I repeat the same analysis for TSOCTs in Table 6. For 20 of the 22 TSOCT performance measures for which there were at least 10 orders in April 2001, the average TSOCT exceeds the average target interval (by 0.66 days to 6.33 days). See columns (1) to (3) of Table 6. However, some or all of this difference is explained by extra requested intervals. All of the entire performance gap is explained by factors outside of BellSouth’s control for six of the 22 TSOCT

performance measures in my analysis. For each of the remaining 14 performance measures, a substantial proportion of the performance gap is explained by factors outside of BellSouth's control. See columns (4) to (6) of Table 6.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

AFFIDAVIT

STATE OF: Illinois
COUNTY OF: Cook

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Gustavo E. Bamberger-Senior Vice President, Lexecon, Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 97-00309 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 13 pages and 2 exhibit(s).

Gustavo E. Bamberger

Sworn to and subscribed
before me on July 24, 2001.

NOTARY PUBLIC

OFFICIAL SEAL
MARGARET J KUSH
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES:07/26/03

GEB - 1

EXHIBIT A

GUSTAVO E. BAMBERGER
Economist

May 2001

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EDUCATION

Ph.D., UNIVERSITY OF CHICAGO, 1987, GRADUATE SCHOOL OF BUSINESS

M.B.A., UNIVERSITY OF CHICAGO, 1984, GRADUATE SCHOOL OF BUSINESS

B.A., SOUTHWESTERN AT MEMPHIS, 1981

EMPLOYMENT

LEXECON INC., Chicago, Illinois (3/87-Present): Senior Vice President

UNIVERSITY OF CHICAGO, (1984, 1986): Lecturer

GOVERNORS STATE UNIVERSITY, (1986): Community Professor

UNIVERSITY OF CHICAGO, (1982-1986): Teaching Assistant

UNIVERSITY OF CHICAGO, (1982-1986): Research Assistant

ACADEMIC HONORS AND FELLOWSHIPS

University of Chicago Fellowship, 1981-1984

H.B. Earhart Fellowship, 1985-1986

RESEARCH PAPERS

"Antitrust and Higher Education: Was There a Conspiracy to Restrict Financial Aid?" co-authored with D. Carlton and R. Epstein, RAND Journal of Economics, (Vol. 26, No. 1, Spring 1995, pp. 131-147).

"Antitrust and Higher Education: MIT Financial Aid (1993)," co-authored with D. Carlton, in The Antitrust Revolution: Economics, Competition, and Policy, John Kwoka and Lawrence White, eds., 1998.

UNPUBLISHED PAPERS

"Airline Networks and Fares" (1996), co-authored with D. Carlton.

"An Empirical Assessment of Predation in the Airline Industry" (1999), co-authored with D. Carlton.

"An Empirical Investigation of the Competitive Effects of Domestic Airline Alliances" (2001), co-authored with D. Carlton and L. Neumann.

TESTIMONIAL EXPERIENCE

Direct, Rebuttal and Cross-Examination Testimony of Gustavo E. Bamberger on behalf of Producer - Marketers Transportation Group, before the Illinois Commerce Commission in Docket No. 90-0007, April 24, 1990 (Direct); July 6, 1990 (Rebuttal); and May 30, 1990 and August 3, 1990 (Cross-Examination).

Testimony of Gustavo E. Bamberger in Re: United States of America v. Irving A. Rubin: In the U.S. District Court for the Northern District of Illinois, Eastern Division, No. 91 CR 44-2, December 3, 1993.

Testimony of Gustavo E. Bamberger in Re: Center for Public Resources Arbitration, E. Merck and EM Industries, Incorporated, against Abbott Laboratories, February 8, 1994.

Deposition and Testimony of Gustavo E. Bamberger in Re: In the Matter of Michael R. Sparks, Debtor: In the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, No. 92 B 21692, May 9, 1994.

Joint Affidavit and Joint Reply Affidavit of John P. Gould and Gustavo E. Bamberger in Re: In the Matters of Review of the Pioneer's Preference Rules and Amendment of the Commission's Rules to Establish New Personal Communications Services: Proceedings before the Federal Communications Commission, ET Docket 93-266, Gen. Docket 90-314, July 26, 1994 (Affidavit); and August 8, 1994 (Reply Affidavit).

Statement of John P. Gould and Gustavo E. Bamberger on Implementing Legislation for the Uruguay Round of GATT (S. 2467) (Pioneer Preference Provisions) Before the Senate Commerce Commission, November 14, 1994.

Report and Deposition of Gustavo E. Bamberger in Re: Khan, et al. v. State Oil Company; In the U.S. District Court for the Northern District of Illinois, Eastern Division, No. 94 C 00035, May 30, 1995 (Report); and July 27, 1995 (Deposition).

Statement and Supplemental Statement of Alan O. Sykes and Gustavo E. Bamberger in Re: Fresh Tomatoes and Bell Peppers, Investigation No. TA-201-66, United States International Trade Commission, June 3, 1996 (Statement); and June 10, 1996 (Supplemental Statement).

Testimony of Gustavo E. Bamberger in Re: Wisconsin Public Service Corporation; WPS Energy Services, Inc.; and WPS Power Development, Inc.: Before the Federal Energy Regulatory Commission, Docket No. ER96-1088-000, July 22, 1996.

Pre-Filed Direct, Rebuttal and Re-Direct Testimony of Gustavo E. Bamberger in Re: Disapproval of Rate Filings for American Casualty Company of Reading, Pennsylvania, and Continental Casualty Company, Before the State Office of Administrative Hearings (Texas), SOAH Docket No. 454-96-0800, September 10, 1996 (Direct); September 16, 1996 (Rebuttal); and September 27, 1996 (Re-Direct).

Affidavit of Gustavo E. Bamberger in Re: Summit Family Restaurants Inc., a Delaware Corporation; HTB Restaurants Inc., a Delaware Corporation; and CKE Restaurants Inc., a Delaware Corporation vs. HomeTown Buffet, Inc., a Delaware Corporation; and Buffets, Inc., a Minnesota Corporation: In the United States District Court for the District of Utah, Central Division, No. 96 CV 0688B, September 17, 1996.

Report, Supplemental Report, Deposition and Affidavit of Gustavo E. Bamberger in Re: Blue Cross & Blue Shield United of Wisconsin, and Compcare Health Services Insurance Corporation v. The Marshfield Clinic and Security Health Plan of Wisconsin, Inc.: In the U.S. District Court for the Western District of Wisconsin, No. 94-C-0137-C, December 19, 1996 (Report with William J. Lynk); February 10, 1997 (Supplemental Report William J. Lynk); March 18, 1997 (Deposition); and April 4, 1997 (Affidavit).

Affidavit of Dennis W. Carlton and Gustavo E. Bamberger in Re: Pacific Gas & Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company: United States of America Before the Federal Energy Regulatory Commission, FERC Docket No. ER96-1663-000, January 16, 1997.

Testimony and Prepared Statement of Gustavo E. Bamberger on behalf of Sacramento Municipal Utility District in Re: Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company: Before the Federal Energy Regulatory Commission Technical Conference on Structural Mitigation Options, Docket No. ER96-1663-000, January 17, 1997.

Affidavit, Report, Rebuttal Report and Deposition of Gustavo E. Bamberger in Re: Henry & Joann Rozema, Island Sports Center, Inc., Mark McKay, Lawrence Halida, Harriet Halida, and Kathleen Malek, on behalf of themselves and all others similarly situated v. The Marshfield Clinic, Security Health Plan of Wisconsin, Inc., North Central Health Protection Plan, and Rhinelander Medical Center, S.C.: In the U.S. District Court for the Western District of Wisconsin, No. 94-C-592-C, July 11, 1997 (Affidavit); July 23, 1997 (Report with William J. Lynk); September 2, 1997 (Rebuttal Report); and September 11-12, 1997 (Deposition).

Deposition, Testimony and Surrebuttal Testimony of Gustavo E. Bamberger in Re: Deltic Farm & Timber, Co., Inc. vs. Great Lakes Chemical Corporation: In the U.S. District Court for the Western District of Arkansas, El Dorado Division, No. 95-1090, November 13, 1997 (Deposition); December 9, 1997 (Testimony); and December 10, 1997 (Surrebuttal Testimony).

Report, Deposition and Testimony of Gustavo E. Bamberger in Re: In the Arbitration of Bandag, Incorporated, Claimant, v. Treadco, Inc., Respondent; Treadco, Inc., Counter-Claimant and Claimant, v. Bandag, Incorporated, Martin Carver, William Sweatman, J.J. Seiter, Ronald Toothaker, and Ronald Hawks, Counter-Respondent and Respondents: In the American Arbitration Association, Chicago, Illinois, No. 51 114 0038 95, May 21, 1998 (Report); August 18, 1998 (Deposition); and November 12 and 16, 1998 (Testimony).

Report, Deposition and Testimony of Gustavo E. Bamberger in Re: Hamilton, et al. v. Accu-Tek, et al.: In the U.S. District Court for the Eastern District of New York, No. 95 CV 0049, July 27, 1998 (Testimony before Magistrate Judge Cheryl L. Pollak); October 16, 1998 (Report); November 13, 1998 (Deposition); and January 27-28, 1999 (Testimony).

Expert Report of Robert H. Gertner and Gustavo E. Bamberger in Re: BDPCS, INC., d/b/a BEST DIGITAL, and BDPCS Holdings, Inc., formerly known as Questcom, Claimants, v. U S WEST, Inc. and U S WEST Communications, Inc., Respondents: American Arbitration Association, Denver Office, No. 77 181 00204 97, July 31, 1998.

Statement of Dennis W. Carlton and Gustavo E. Bamberger in Re: Enforcement Policy Regarding Unfair Exclusionary Conduct in the Air Transportation Industry: Before the Department of Transportation, Office of the Secretary, Washington, D.C., Docket OST-98-3713, September 24, 1998.

Responsive Direct Testimony and Cross-Examination Testimony of Gustavo E. Bamberger for Intervenor Oklahoma Gas and Electric Company in Re: Joint Application of American Electric Power Company, Inc., Public Service Company of Oklahoma and Central and South West Corporation Regarding Proposed Merger: Before the Corporation Commission of the State of Oklahoma, Cause No. PUD 980000444, March 29, 1999 (Responsive Direct Testimony with Dennis Carlton); and April 21, 1999 (Cross-Examination).

Prepared Answering Testimony and Exhibits of Gustavo E. Bamberger and Dennis W. Carlton on Behalf of Oklahoma Gas and Electric Company in Re: American Electric Power Company, Inc. and Central and South West Corporation: United States of America Before the Federal Energy Regulatory Commission, FERC Docket Nos. ER98-40-000, ER98-2770-000, ER98-2786-000, April 28, 1999.

Affidavit of Gustavo E. Bamberger on Behalf of Allegheny Energy in Re: Dominion Resources, Inc. and Consolidated Natural Gas Company: United States of America Before the Federal Energy Regulatory Commission, FERC Docket No. EC99-81-000, August 5, 1999.

Rebuttal Report of Dennis W. Carlton and Gustavo E. Bamberger; Reply Report of Dennis W. Carlton and Gustavo E. Bamberger; Rebuttal Report of Dennis W. Carlton and Gustavo E. Bamberger to Professor Michael Ward; Testimony of Dennis W. Carlton and Gustavo E. Bamberger; Critique of the Memorandum of Fact and Law of the Commissioner of Competition by Gustavo E. Bamberger in Re: The Commissioner of Competition and Superior Propane Inc. and ICG Propane Inc.: Before The Competition Tribunal, No. CT-98/2, September 14, 1999 (Rebuttal Report); September 19, 1999 (Reply Report); September 27, 1999 (Rebuttal Report to Professor Michael Ward); December 13-14, 1999 (Testimony); and January 31, 2000 (Critique).

Declaration and Reply Declaration of Robert H. Gertner and Gustavo E. Bamberger In the matter of: Application by New York Telephone Company (d/b/a Bell Atlantic - New York), Bell Atlantic Communications, Inc., NYNEX Long Distance, and Bell Atlantic Global Networks, Inc., for Provision of In-Region, InterLATA Services in New York: Before the Federal Communications Commission, CC Docket No. 99-295, September 29, 1999 (Declaration) and November 8, 1999 (Reply Declaration).

Statement of Gustavo E. Bamberger and Hans-Jürgen Petersen In the matter of: Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company – Track 2: Before the State of New York Public Service Commission, Case 92-C-0665, November 30, 1999.

Report and Deposition of Gustavo E. Bamberger In Re: Northwest Airlines Corp. et al., Antitrust Litigation: In the United States District Court for the Eastern District of Michigan, Master File No. 96-74711, March 31, 2000 (Report); and July 21, 2000 (Deposition).

Testimony and Cross-Examination of Gustavo E. Bamberger on Behalf of Sacramento Municipal Utility District Regarding Public Interest Issues Raised by Alternative Methods of Valuation In Re: Application of Pacific Gas & Electric Company to Market Value Hydroelectric Generating Plants and Related Assets Pursuant to Public Utility Code Sections 367(b) and 851: Before the Public Utilities Commission of the State of California, Application No. 99-09-053, June 8, 2000 (Testimony); and June 27 (Cross-Examination).

Comments on the SEC's Proposed Auditor Independence Standards, SEC File No. S7-13-00, filed with the Securities and Exchange Commission, on behalf of Arthur Andersen, Deloitte & Touche, KPMG and the American Institute of Certified Public Accountants (with Charles C. Cox and Kenneth R. Cone), September 25, 2000.

Joint Reply Declaration, Joint Supplemental Declaration and Joint Supplemental Reply Declaration of Robert H. Gertner and Gustavo E. Bamberger In the matter of: Application by Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), and Verizon Global Networks Inc., for Authorization To Provide In-Region, InterLATA Services in Massachusetts: Before the Federal Communications Commission, CC Docket No. 00-176 and CC Docket No. 01-9, November 3, 2000 (Reply Declaration); January 16, 2001 (Supplemental Declaration); and February 28, 2001 (Supplemental Reply Declaration).

Declaration of Robert H. Gertner and Gustavo E. Bamberger, submitted to the Federal Communications Commission, in Re: Bell Atlantic/NYNEX Merger Performance Monitoring Reports, November 30, 2000.

Testimony and Rebuttal Testimony of Gustavo E. Bamberger on Behalf of Sacramento Municipal Utility District In Re: Application of Pacific Gas & Electric Company to Market Value Hydroelectric Generating Plants and Related Assets Pursuant to Public Utility Code Sections 367(b) and 851: Before the Public Utilities Commission of the State of California, Application No. 99-09-053, December 5, 2000 (Testimony); and January 16, 2001 (Rebuttal Testimony).

Report, Rebuttal Report, Revised Damage Report and Deposition of Gustavo E. Bamberger in Re: Republic Tobacco, L.P. v. North Atlantic Trading Company, Inc., North Atlantic Operating Company, Inc. and National Tobacco Co., L.P.: In the U.S. District Court for the Northern District of Illinois, Eastern Division, No. 98 C 4011, February 5, 2001 (Report); April 20, 2001 (Rebuttal Report); April 20, 2001 (Revised Damage Report); and May 15-16 (Deposition).

Joint Reply Declaration of Robert H. Gertner and Gustavo E. Bamberger In the matter of: Application by Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization To Provide In-Region, InterLATA Services in Connecticut: Before the Federal Communications Commission, CC Docket No. ___, April 23, 2001.

Direct Testimony of Gustavo E. Bamberger in Re: Petition for Approval of a Statement of Generally Available Terms and Conditions Pursuant to §252(f) of the Telecommunications Act of 1996 and Notification of Intention to File a Petition for In-region InterLATA Authority With the FCC Pursuant to §271 of the Telecommunications Act of 1996: Before the Alabama Public Service Commission, Docket No. 25835, May 16, 2001.

Affidavit of Robert H. Gertner and Gustavo E. Bamberger In the matter of: BellSouth Telecommunications, Inc.'s Entry into InterLATA Services PursuantTo Section 271 of the Telecommunications Act of 1996: Before the Georgia Public Service Commission, Docket No. 6863-U, May 31, 2001.

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Table 1A

OCI Performance Measures Included in Analysis
May 2001

Report Number	Report Description
A.2.1.1.1.1	Res/<10circuits/Dis/TN
A.2.1.1.1.2	Res/<10circuits/Non-Dis/TN
A.2.1.1.2.1	Res/>=10circuits/Dis/TN
A.2.1.2.1.1	Bus/<10circuits/Dis/TN
A.2.1.2.1.2	Bus/<10circuits/Non-Dis/TN
A.2.1.2.2.1	Bus/>=10circuits/Dis/TN
A.2.1.2.2.2	Bus/>=10circuits/Non-Dis/TN
B.2.1.3.1.1	Combo(loop+port)/<10circuits/Dis/TN
B.2.1.3.1.2	Combo(loop+port)/<10circuits/Non-Dis/TN
B.2.1.3.2.1	Combo(loop+port)/>=10circuits/Dis/TN
B.2.1.3.2.2	Combo(loop+port)/>=10circuits/Non-Dis/TN
B.2.1.5.3.1	xDSL(ADSL,HDSL,andUCL)/<6circuits/Dis/TN
B.2.1.5.3.2	xDSL(ADSL,HDSL,andUCL)/<6circuits/Non-Dis/TN
B.2.1.5.4.1	xDSL(ADSL,HDSL,andUCL)/6-13circuits/Dis/TN
B.2.1.7.3.1	Line Sharing/<6circuits/Dis/TN
B.2.1.7.3.2	Line Sharing/<6circuits/Non-Dis/TN
B.2.1.7.4.1	Line Sharing/6-13circuits/Dis/TN
B.2.1.8.1.1	2W Ana Lp Des/<10circuits/Dis/TN
B.2.1.8.1.2	2W Ana Lp Des/<10circuits/Non-Dis/TN
B.2.1.8.2.1	2W Ana Lp Des/>=10circuits/Dis/TN
B.2.1.8.2.2	2W Ana Lp Des/>=10circuits/Non-Dis/TN
B.2.1.9.1.1	2W Ana Lp Non-Des/<10circuits/Dis/TN
B.2.1.9.2.1	2W Ana Lp Non-Des/>=10circuits/Dis/TN
B.2.1.10.1.1	2W INP Lp Des/<10circuits/Dis/TN
B.2.1.10.1.2	2W INP Lp Des/<10circuits/Non-Dis/TN
B.2.1.10.2.1	2W INP Lp Des/>=10circuits/Dis/TN
B.2.1.10.2.2	2W INP Lp Des/>=10circuits/Non-Dis/TN
B.2.1.11.1.1	2W INP Lp Non-Des/<10circuits/Dis/TN
B.2.1.11.2.1	2W INP Lp Non-Des/>=10circuits/Dis/TN
B.2.1.12.1.1	2W LNP Lp Des/<10circuits/Dis/TN
B.2.1.12.1.2	2W LNP Lp Des/<10circuits/Non-Dis/TN
B.2.1.12.2.1	2W LNP Lp Des/>=10circuits/Dis/TN
B.2.1.12.2.2	2W LNP Lp Des/>=10circuits/Non-Dis/TN
B.2.1.13.1.1	2W LNP Lp Non-Des/<10circuits/Dis/TN
B.2.1.13.2.1	2W LNP Lp Non-Des/>=10circuits/Dis/TN

Table 1B

TSOCT Performance Measures Included in Analysis
May 2001

Report Number	Report Description
A.2.17.1.1.1	M-Res/<10circuits/Dis/TN
A.2.17.1.1.2	M-Res/<10circuits/Non-Dis/TN
A.2.17.2.1.1	M-Bus/<10circuits/Dis/TN
A.2.17.2.1.2	M-Bus/<10circuits/Non-Dis/TN
A.2.17.2.2.1	M-Bus/>=10circuits/Dis/TN
A.2.18.1.1.1	PM-Res/<10circuits/Dis/TN
A.2.18.1.1.2	PM-Res/<10circuits/Non-Dis/TN
A.2.18.2.1.1	PM-Bus/<10circuits/Dis/TN
A.2.18.2.1.2	PM-Bus/<10circuits/Non-Dis/TN
A.2.18.2.2.1	PM-Bus/>=10circuits/Dis/TN
A.2.19.1.1.1	NM-Res/<10circuits/Dis/TN
A.2.19.1.1.2	NM-Res/<10circuits/Non-Dis/TN
A.2.19.2.1.1	NM-Bus/<10circuits/Dis/TN
A.2.19.2.1.2	NM-Bus/<10circuits/Non-Dis/TN
B.2.24.3.1.1	M-Combo(loop+port)/<10circuits/Dis/TN
B.2.24.3.1.2	M-Combo(loop+port)/<10circuits/Non-Dis/TN
B.2.24.8.1.1	M-2W Ana Lp Des/<10circuits/Dis/TN
B.2.25.3.1.1	PM-Combo(loop+port)/<10circuits/Dis/TN
B.2.25.3.1.2	PM-Combo(loop+port)/<10circuits/Non-Dis/TN
B.2.25.3.2.1	PM-Combo(loop+port)/>=10circuits/Dis/TN
B.2.25.8.1.1	PM-2W Ana Lp Des/<10circuits/Dis/TN
B.2.25.8.2.1	PM-2W Ana Lp Des/>=10circuits/Dis/TN
B.2.26.3.1.1	NM-Combo(loop+port)/<10circuits/Dis/TN
B.2.26.3.1.2	NM-Combo(loop+port)/<10circuits/Non-Dis/TN
B.2.26.3.2.2	NM-Combo(loop+port)/>=10circuits/Non-Dis/TN
B.2.26.5.1.1	NM-xDSL (ADSL, HDSL and UCL)/<10circuits/Dis/TN
B.2.26.8.1.1	NM-2W Ana Lp Des/<10circuits/Dis/TN
B.2.26.9.1.1	NM-2W Ana Lp Non-Des/<10circuits/Dis/TN
B.2.26.11.1.2	NM-2W INP Lp Non-Des/<10circuits/Non-Dis/TN

Note: 'M' refers to mechanized orders; 'PM' refers to partially mechanized orders; and 'NM' refers to non-mechanized orders.

Table 2A

Target OCIs by Report Number
May 2001

Report Number	Report Description	Number of Circuits	Target OCI
A.2.1.1.1.1	Res/<10circuits/Dis/TN	<= 2	2
		3	5
		4	6
		5	7
		6 - 10	8
A.2.1.1.1.2	Res/<10circuits/Non-Dis/TN	All	0-2
A.2.1.1.2.1	Res/>=10circuits/Dis/TN	All	10
A.2.1.2.1.1	Bus/<10circuits/Dis/TN	<= 2	2
		3	5
		4	6
		5	7
		6 - 10	8
A.2.1.2.1.2	Bus/<10circuits/Non-Dis/TN	All	0-2
A.2.1.2.2.1	Bus/>=10circuits/Dis/TN	All	10
A.2.1.2.2.2	Bus/>=10circuits/Non-Dis/TN	All	0-2
B.2.1.3.1.1	Combo(loop+port)/<10circuits/Dis/TN	<= 2	2
		3	5
		4	6
		5	7
		6 - 10	8
B.2.1.3.1.2	Combo(loop+port)/<10circuits/Non-Dis/TN	All	0-2
B.2.1.3.2.1	Combo(loop+port)/>=10circuits/Dis/TN	All	10
B.2.1.3.2.2	Combo(loop+port)/>=10circuits/Non-Dis/TN	All	0-2
B.2.1.5.3.1	xDSL(ADSL,HDSL,andUCL)/<6circuits/Dis/TN	All	5
B.2.1.5.3.2	xDSL(ADSL,HDSL,andUCL)/<6circuits/Non-Dis/TN	All	5

Table 2A

Target OCIs by Report Number
May 2001

Report Number	Report Description	Number of Circuits	Target OCI
B.2.1.5.4.1	xDSL(ADSL,HDSL,andUCL)/6-13circuits/Dis/TN	All	7
B.2.1.7.3.1	Line Sharing/<6circuits/Dis/TN	All	3
B.2.1.7.3.2	Line Sharing/<6circuits/Non-Dis/TN	All	3
B.2.1.7.4.1	Line Sharing/6-13circuits/Dis/TN	All	5
B.2.1.8.1.1	2W Ana Lp Des/<10circuits/Dis/TN	<= 5	5
		6 - 14	7
B.2.1.8.1.2	2W Ana Lp Des/<10circuits/Non-Dis/TN	<= 5	5
		6 - 14	7
B.2.1.8.2.1	2W Ana Lp Des/>=10circuits/Dis/TN	6 - 14	7
		>= 15	Negotiated
B.2.1.8.2.2	2W Ana Lp Des/>=10circuits/Non-Dis/TN	6 - 14	7
		>= 15	Negotiated
B.2.1.9.1.1	2W Ana Lp Non-Des/<10circuits/Dis/TN	<= 5	4
		6 - 14	6
B.2.1.9.2.1	2W Ana Lp Non-Des/>=10circuits/Dis/TN	6 - 14	6
		>= 15	Negotiated
B.2.1.10.1.1	2W INP Lp Des/<10circuits/Dis/TN	<= 5	5
		6 - 14	7
B.2.1.10.1.2	2W INP Lp Des/<10circuits/Non-Dis/TN	<= 5	5
		6 - 14	7
B.2.1.10.2.1	2W INP Lp Des/>=10circuits/Dis/TN	6 - 14	6
		>= 15	Negotiated
B.2.1.10.2.2	2W INP Lp Des/>=10circuits/Non-Dis/TN	6 - 14	6

Table 2A

Target OCIs by Report Number
May 2001

Report Number	Report Description	Number of Circuits	Target OCI
		>= 15	Negotiated
B.2.1.11.1.1	2W INP Lp Non-Des/<10circuits/Dis/TN	<= 5	4
		6 - 14	6
B.2.1.11.2.1	2W INP Lp Non-Des/>=10circuits/Dis/TN	6 - 14	6
		>= 15	Negotiated
B.2.1.12.1.1	2W LNP Lp Des/<10circuits/Dis/TN	<= 5	5
		6 - 14	7
B.2.1.12.1.2	2W LNP Lp Des/<10circuits/Non-Dis/TN	<= 5	5
		6 - 14	7
B.2.1.12.2.1	2W LNP Lp Des/>=10circuits/Dis/TN	6 - 14	7
		>= 15	Negotiated
B.2.1.12.2.2	2W LNP Lp Des/>=10circuits/Non-Dis/TN	6 - 14	7
		>= 15	Negotiated
B.2.1.13.1.1	2W LNP Lp Non-Des/<10circuits/Dis/TN	<= 5	4
		6 - 14	6
B.2.1.13.2.1	2W LNP Lp Non-Des/>=10circuits/Dis/TN	6 - 14	6
		>= 15	Negotiated

Note: TSOCTs with ranges indicate a FOC interval of 0 days if received by 10am and 1 day if received after 10am. OCIs with ranges indicate 0 days if order number begins with "C" and 1 day if order number begins with "N" or "T". Those with LSR time after 10am have an additional day added.

Table 2B

Target TSOCTs by Report Number
May 2001

Report Number	Report Description	Number of Circuits	Target TSOCT
A.2.17.1.1.1	M-Res/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
A.2.17.1.1.2	M-Res/<10circuits/Non-Dis/TN	All	0-3
A.2.17.2.1.1	M-Bus/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
A.2.17.2.1.2	M-Bus/<10circuits/Non-Dis/TN	All	0-3
A.2.17.2.2.1	M-Bus/>=10circuits/Dis/TN	All	10-11
A.2.18.1.1.1	PM-Res/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
A.2.18.1.1.2	PM-Res/<10circuits/Non-Dis/TN	All	0-3
A.2.18.2.1.1	PM-Bus/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
A.2.18.2.1.2	PM-Bus/<10circuits/Non-Dis/TN	All	0-3
A.2.18.2.2.1	PM-Bus/>=10circuits/Dis/TN	All	10-11
A.2.19.1.1.1	NM-Res/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7

Table 2B

Target TSOCTs by Report Number
May 2001

Report Number	Report Description	Number of Circuits	Target TSOCT
		5	7-8
		6 - 10	8-9
A.2.19.1.1.2	NM-Res/<10circuits/Non-Dis/TN	All	0-3
A.2.19.2.1.1	NM-Bus/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
A.2.19.2.1.2	NM-Bus/<10circuits/Non-Dis/TN	All	0-3
B.2.24.3.1.1	M-Combo(loop+port)/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
B.2.24.3.1.2	M-Combo(loop+port)/<10circuits/Non-Dis/TN	All	0-3
B.2.24.8.1.1	M-2W Ana Lp Des/<10circuits/Dis/TN	<= 5	5-6
		6 - 14	7-8
B.2.25.3.1.1	PM-Combo(loop+port)/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
B.2.25.3.1.2	PM-Combo(loop+port)/<10circuits/Non-Dis/TN	All	0-3
B.2.25.3.2.1	PM-Combo(loop+port)/>=10circuits/Dis/TN	All	10-11
B.2.25.8.1.1	PM-2W Ana Lp Des/<10circuits/Dis/TN	<= 5	5-6
		6 - 14	7-8
B.2.25.8.2.1	PM-2W Ana Lp Des/>=10circuits/Dis/TN	6 - 14	7-8
		>= 15	Negotiated

Table 2B

Target TSOCTs by Report Number
May 2001

Report Number	Report Description	Number of Circuits	Target TSOCT
B.2.26.3.1.1	NM-Combo(loop+port)/<10circuits/Dis/TN	<= 2	2-3
		3	5-6
		4	6-7
		5	7-8
		6 - 10	8-9
B.2.26.3.1.2	NM-Combo(loop+port)/<10circuits/Non-Dis/TN	All	0-3
B.2.26.3.2.2	NM-Combo(loop+port)/>=10circuits/Non-Dis/TN	All	0-3
B.2.26.5.1.1	NM-xDSL (ADSL, HDSL and UCL)/<10circuits/Dis/TN	1-5	5-6
		6-10	10-11
B.2.26.8.1.1	NM-2W Ana Lp Des/<10circuits/Dis/TN	<= 5	5-6
		6 - 14	7-8
B.2.26.9.1.1	NM-2W Ana Lp Non-Des/<10circuits/Dis/TN	<= 5	4-5
		6 - 14	6-7
B.2.26.11.1.2	NM-2W INP Lp Non-Des/<10circuits/Non-Dis/TN	<= 5	4-5
		6 - 14	6-7

Note: TSOCTs with ranges indicate a FOC interval of 0 days if received by 10am and 1 day if received after 10am. OCIs with ranges indicate 0 days if order number begins with "C" and 1 day if order number begins with "N" or "T". Those with LSR time after 10am have an additional day added.

'M' refers to mechanized orders; 'PM' refers to partially mechanized orders; and 'NM' 'refers to non-mechanized orders.

Table 3A

OCI Interval
May 2001

Report Number	Report Description	Unadjusted Retail (1)	Unadjusted CLEC (2)	Unadjusted Difference (3)=(2)-(1)	Adjusted Retail (4)	Adjusted CLEC (5)	Adjusted Difference (6)=(5)-(4)	Change Retail (7)=(1)-(4)	Change CLEC (8)=(2)-(5)	Change Difference (9)=(8)-(7)
A.2.1.1.1.1	Res/<10circuits/Dis/TN	6.86	5.81	-1.05	6.41	1.75	-4.67	0.45	4.06	3.62
A.2.1.1.1.2	Res/<10circuits/Non-Dis/TN	1.04	1.09	0.05	1.03	0.57	-0.46	0.01	0.52	0.51
A.2.1.2.1.1	Bus/<10circuits/Dis/TN	4.24	3.08	-1.16	3.25	1.91	-1.34	0.99	1.17	0.18
A.2.1.2.1.2	Bus/<10circuits/Non-Dis/TN	1.30	1.61	0.31	1.26	0.69	-0.57	0.04	0.93	0.89
B.2.1.3.1.1	Combo(loop+port)/<10circuits/Dis/TN	5.84	3.06	-2.78	5.16	1.50	-3.66	0.68	1.56	0.88
B.2.1.3.1.2	Combo(loop+port)/<10circuits/Non-Dis/TN	1.06	0.98	-0.07	1.04	0.61	-0.43	0.01	0.37	0.36
B.2.1.5.3.1	DSL/<6circuits/Dis/TN	7.67	6.74	-0.93	7.35	6.25	-1.11	0.32	0.49	0.17
B.2.1.8.1.1	2W Ana Lp Des/<10circuits/Dis/TN	5.84	7.19	1.35	5.16	7.30	2.14	0.68	-0.11	-0.79
B.2.1.12.1.1	2W LNP Lp Des/<10circuits/Dis/TN	5.84	7.55	1.71	5.16	7.53	2.37	0.68	0.02	-0.66

Table 3B

Observations in OCI Interval
May 2001

Report Number	Report Description	Unadjusted		Adjusted	
		Retail	CLEC	Retail	CLEC
A.2.1.1.1.1	Res/<10circuits/Dis/TN	13,445	416	12,639	46
A.2.1.1.1.2	Res/<10circuits/Non-Dis/TN	246,712	11,327	246,128	9,271
A.2.1.2.1.1	Bus/<10circuits/Dis/TN	8,760	86	8,234	61
A.2.1.2.1.2	Bus/<10circuits/Non-Dis/TN	14,775	294	14,620	114
B.2.1.3.1.1	Combo(loop+port)/<10circuits/Dis/TN	22,457	67	21,096	48
B.2.1.3.1.2	Combo(loop+port)/<10circuits/Non-Dis/TN	262,888	1,397	262,134	1,148
B.2.1.5.3.1	DSL/<6circuits/Dis/TN	268	91	230	34
B.2.1.8.1.1	2W Ana Lp Des/<10circuits/Dis/TN	22,457	128	21,096	27
B.2.1.12.1.1	2W LNP Lp Des/<10circuits/Dis/TN	22,457	60	21,096	17

Table 4A

TSOCT Interval
May 2001

Report Number	Report Description	Unadjusted	Adjusted	Change
A.2.17.1.1.1	M-Res/<10circuits/Dis/TN	6.19	2.06	4.13
A.2.17.1.1.2	M-Res/<10circuits/Non-Dis/TN	1.05	0.59	0.46
A.2.17.2.1.1	M-Bus/<10circuits/Dis/TN	3.49	2.50	0.99
A.2.17.2.1.2	M-Bus/<10circuits/Non-Dis/TN	2.11	0.83	1.28
A.2.18.1.1.1	PM-Res/<10circuits/Dis/TN	5.23	3.35	1.87
A.2.18.1.1.2	PM-Res/<10circuits/Non-Dis/TN	2.38	1.46	0.93
A.2.18.2.1.1	PM-Bus/<10circuits/Dis/TN	4.41	3.04	1.37
A.2.18.2.1.2	PM-Bus/<10circuits/Non-Dis/TN	2.45	2.23	0.22
A.2.19.1.1.1	NM-Res/<10circuits/Dis/TN	5.05	4.43	0.62
A.2.19.1.1.2	NM-Res/<10circuits/Non-Dis/TN	4.41	3.07	1.35
A.2.19.2.1.1	NM-Bus/<10circuits/Dis/TN	5.09	4.13	0.97
A.2.19.2.1.2	NM-Bus/<10circuits/Non-Dis/TN	4.73	2.76	1.97
B.2.24.3.1.1	M-Combo(loop+port)/<10circuits/Dis/TN	3.81	3.27	0.54
B.2.24.3.1.2	M-Combo(loop+port)/<10circuits/Non-Dis/TN	0.71	0.63	0.08
B.2.25.3.1.1	PM-Combo(loop+port)/<10circuits/Dis/TN	3.53	2.71	0.82
B.2.25.3.1.2	PM-Combo(loop+port)/<10circuits/Non-Dis/TN	2.60	1.97	0.63
B.2.25.8.1.1	PM-2W Ana Lp Des/<10circuits/Dis/TN	11.22	10.44	0.78
B.2.25.12.1.1	PM-2W LNP Lp Des/<10circuits/Dis/TN	8.02	7.77	0.25
B.2.26.5.1.1	NM-xDSL (ADSL, HDSL and UCL)/<10circuits/Dis/TN	11.01	9.90	1.11
B.2.26.8.1.1	NM-2W Ana Lp Des/<10circuits/Dis/TN	12.45	11.67	0.78
B.2.26.12.1.1	NM-2W LNP Lp Des/<10circuits/Dis/TN	8.44	8.50	-0.06
B.2.26.13.1.2	NM-2W LNP Lp Non-Des/<10circuits/Non-Dis/TN	6.00	6.00	0.00

Note: 'M' refers to mechanized orders; 'PM' refers to partially mechanized orders; and 'NM' refers to to non-mechanized orders.

Table 4B

Observations in TSOCT Interval
May 2001

Report Number	Report Description	Unadjusted	Adjusted
A.2.17.1.1.1	M-Res/<10circuits/Dis/TN	311	12
A.2.17.1.1.2	M-Res/<10circuits/Non-Dis/TN	9,866	8,622
A.2.17.2.1.1	M-Bus/<10circuits/Dis/TN	44	31
A.2.17.2.1.2	M-Bus/<10circuits/Non-Dis/TN	77	47
A.2.18.1.1.1	PM-Res/<10circuits/Dis/TN	53	17
A.2.18.1.1.2	PM-Res/<10circuits/Non-Dis/TN	1,038	629
A.2.18.2.1.1	PM-Bus/<10circuits/Dis/TN	21	16
A.2.18.2.1.2	PM-Bus/<10circuits/Non-Dis/TN	68	43
A.2.19.1.1.1	NM-Res/<10circuits/Dis/TN	21	14
A.2.19.1.1.2	NM-Res/<10circuits/Non-Dis/TN	45	20
A.2.19.2.1.1	NM-Bus/<10circuits/Dis/TN	11	8
A.2.19.2.1.2	NM-Bus/<10circuits/Non-Dis/TN	58	24
B.2.24.3.1.1	M-Combo(loop+port)/<10circuits/Dis/TN	12	10
B.2.24.3.1.2	M-Combo(loop+port)/<10circuits/Non-Dis/TN	878	832
B.2.25.3.1.1	PM-Combo(loop+port)/<10circuits/Dis/TN	38	30
B.2.25.3.1.2	PM-Combo(loop+port)/<10circuits/Non-Dis/TN	424	312
B.2.25.8.1.1	PM-2W Ana Lp Des/<10circuits/Dis/TN	50	9
B.2.25.12.1.1	PM-2W LNP Lp Des/<10circuits/Dis/TN	43	13
B.2.26.5.1.1	NM-xDSL (ADSL, HDSL and UCL)/<10circuits/Dis/TN	73	20
B.2.26.8.1.1	NM-2W Ana Lp Des/<10circuits/Dis/TN	31	3
B.2.26.12.1.1	NM-2W LNP Lp Des/<10circuits/Dis/TN	45	16
B.2.26.13.1.2	NM-2W LNP Lp Non-Des/<10circuits/Non-Dis/TN	14	8

Note: 'M' refers to mechanized orders; 'PM' refers to partially mechanized orders; and 'NM' refers to non-mechanized orders.

Table 5

CLEC OCIs
May 2001

Report Number	Report Description	Unadjusted Performance (1)	Target (2)	Difference Between Performance and Target (3)=(1)-(2)	Extra Requested Interval (4)	Customer Miss Extra Interval (5)	Performance as Adjusted (6)=(1)-(4)-(5)	Adjusted Difference (7)=(6)-(2)
A.2.1.1.1.1	Res/<10circuits/Dis/TN	5.81	1.93	3.88	3.72	0.18	1.91	-0.02
A.2.1.1.1.2	Res/<10circuits/Non-Dis/TN	1.08	0.70	0.38	0.65	0.00	0.43	-0.27
A.2.1.2.1.1	Bus/<10circuits/Dis/TN	3.08	1.53	1.54	1.00	0.16	1.91	0.38
A.2.1.2.1.2	Bus/<10circuits/Non-Dis/TN	1.67	0.75	0.92	1.28	0.00	0.39	-0.36
B.2.1.3.1.1	Combo(loop+port)/<10circuits/Dis/TN	3.06	1.42	1.64	0.96	0.71	1.40	-0.03
B.2.1.3.1.2	Combo(loop+port)/<10circuits/Non-Dis/TN	0.92	0.68	0.24	0.54	0.00	0.39	-0.30
B.2.1.5.3.1	DSL/<6circuits/Dis/TN	6.74	4.97	1.77	1.44	0.22	5.08	0.11
B.2.1.8.1.1	2W Ana Lp Des/<10circuits/Dis/TN	7.19	5.12	2.07	1.76	0.09	5.34	0.22
B.2.1.12.1.1	2W LNP Lp Des/<10circuits/Dis/TN	7.55	5.22	2.33	1.58	0.13	5.83	0.62

Table 6

CLEC TSOCTs
May 2001

Report Number	Report Description	Unadjusted Performance (1)	Target (2)	Difference Between Performance and Target (3)=(1)-(2)	Extra Requested Interval (4)	Performance as Adjusted (5)=(1)-(4)	Adjusted Difference (6)=(5)-(2)
A.2.17.1.1.1	M-Res/<10circuits/Dis/TN	6.19	2.83	3.35	4.15	2.04	-0.79
A.2.17.1.1.2	M-Res/<10circuits/Non-Dis/TN	1.05	1.38	-0.33	0.59	0.46	-0.92
A.2.17.2.1.1	M-Bus/<10circuits/Dis/TN	3.49	2.29	1.20	1.00	2.49	0.20
A.2.17.2.1.2	M-Bus/<10circuits/Non-Dis/TN	2.11	1.45	0.66	1.35	0.76	-0.69
A.2.18.1.1.1	PM-Res/<10circuits/Dis/TN	5.23	2.74	2.49	2.62	2.60	-0.13
A.2.18.1.1.2	PM-Res/<10circuits/Non-Dis/TN	2.38	1.65	0.74	1.25	1.13	-0.51
A.2.18.2.1.1	PM-Bus/<10circuits/Dis/TN	4.41	2.32	2.09	1.05	3.36	1.05
A.2.18.2.1.2	PM-Bus/<10circuits/Non-Dis/TN	2.45	1.52	0.93	0.94	1.51	-0.01
A.2.19.1.1.1	NM-Res/<10circuits/Dis/TN	5.10	2.60	2.50	0.75	4.35	1.75
A.2.19.1.1.2	NM-Res/<10circuits/Non-Dis/TN	4.41	1.70	2.72	1.56	2.86	1.16
A.2.19.2.1.1	NM-Bus/<10circuits/Dis/TN	4.44	1.81	2.63	0.56	3.89	2.07
A.2.19.2.1.2	NM-Bus/<10circuits/Non-Dis/TN	4.73	1.39	3.34	1.59	3.14	1.75
B.2.24.3.1.1	M-Combo(loop+port)/<10circuits/Dis/TN	3.81	2.31	1.50	0.75	3.06	0.75
B.2.24.3.1.2	M-Combo(loop+port)/<10circuits/Non-Dis/TN	0.71	1.23	-0.52	0.20	0.51	-0.72
B.2.25.3.1.1	PM-Combo(loop+port)/<10circuits/Dis/TN	3.53	2.05	1.48	0.87	2.67	0.61
B.2.25.3.1.2	PM-Combo(loop+port)/<10circuits/Non-Dis/TN	2.60	1.56	1.04	1.21	1.39	-0.18
B.2.25.8.1.1	PM-2W Ana Lp Des/<10circuits/Dis/TN	11.27	5.98	5.29	1.96	9.31	3.33
B.2.25.12.1.1	PM-2W LNP Lp Des/<10circuits/Dis/TN	8.02	5.91	2.12	1.02	7.00	1.09
B.2.26.5.1.1	NM-xDSL (ADSL, HDSL and UCL)/<10circuits/Dis/TN	11.16	5.77	5.39	1.64	9.52	3.75
B.2.26.8.1.1	NM-2W Ana Lp Des/<10circuits/Dis/TN	12.17	5.83	6.33	1.78	10.39	4.56
B.2.26.12.1.1	NM-2W LNP Lp Des/<10circuits/Dis/TN	8.44	5.78	2.67	0.93	7.51	1.73
B.2.26.13.1.2	NM-2W LNP Lp Non-Des/<10circuits/Non-Dis/TN	6.00	4.64	1.36	0.43	5.57	0.93

Note: 'M' refers to mechanized orders; 'PM' refers to partially mechanized orders; and 'NM' refers to non-mechanized orders.