BELLSOUTH

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March 12, 2001

VIA HAND DELIVERY

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

Re: *Petition by ITC^DeltaCom Communications, Inc. for Arbitration of Certain Unresolved Issues in Interconnection Agreement Negotiations Between ITC^DeltaCom and BellSouth Telecommunications, Inc.*
Docket No. 99-00430

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Motion for Reconsideration and Clarification. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

IN RE: ***Petition by ITC^DeltaCom Communications, Inc. for Arbitration of Certain Unresolved Issues in Interconnection Agreement Negotiations Between ITC^DeltaCom and BellSouth Telecommunications, Inc.***

Docket No. 99-00430

BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR RECONSIDERATION AND CLARIFICATION

I. INTRODUCTION

BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves that the Tennessee Regulatory Authority ("Authority"), acting as Arbitrators, reconsider and clarify certain aspects of its February 23, 2001 Final Order of Arbitration Award with respect to Issue 1(a) ("Performance Measures"). In its February 23 Order, the Arbitrators determined that, for the purpose of judicial economy, they would hold BellSouth's earlier Motion for Reconsideration and Clarification in abeyance until the entry of a written, final order. The Arbitrators' February 23 Order stated that BellSouth may supplement or amend its Motion.

BellSouth wishes to emphasize that it recognizes fully that the Authority will require a system of comprehensive performance measurements and self-effectuating enforcement mechanisms. BellSouth recognizes its obligations under the 1996 Act and is committed to providing comprehensive measurements by which BellSouth's performance can be judged. In light of the Arbitrators' Order in this proceeding, and the collaborative and contested proceedings relating to performance measurements in other states, BellSouth has continued to update its Service Quality Measurements ("SQMs") to meet the needs of the industry, to comply with regulatory requirements and to streamline performance reporting. As a result, BellSouth is

filing with this Motion a comprehensive set of SQMs, including associated enforcement mechanisms, many of which would be effective in Tennessee prior to the granting of 271 relief. BellSouth believes that this proposal, which encompasses both substantial enhancements to the SQMs and BellSouth's agreement to self-effectuating remedies, can be implemented far more efficiently than the combination of provisions from the BellSouth and DeltaCom Best and Final Offers ordered by the Arbitrators in this proceeding. BellSouth's proposal includes standards and benchmarks which, as required by the February 23rd Order, are both specific and measurable. Consistent with the Arbitrators' February 23rd Order, these enforcement mechanisms will result in prompt enforcement with appropriate consequences, and CLECs in Tennessee will not be required to rely solely upon the legal/regulatory process to obtain appropriate remedies. BellSouth intends to file this new proposal in the Generic Performance Measures proceeding (Docket No. 00-00392) as well.

As stated, BellSouth recognizes the substantial amount of time and effort spent by the Arbitrators and the Authority Staff in reviewing the respective proposals made by BellSouth and DeltaCom earlier in this proceeding. BellSouth respectfully requests that the Arbitrators carefully consider this proposal, for the reasons set forth in this Motion. The proposal contains comprehensive measurements, benchmarks/analogs, and enforcement mechanisms for Tennessee that BellSouth is willing to agree to and is able to implement in a reasonable time. The proposed enforcement mechanisms provide powerful incentives for BellSouth to maintain a level of performance for all CLECs that is at least equal to the level of performance provided to BellSouth's retail customers.

II. DISCUSSION

While BellSouth supports the Arbitrators' decision to adopt BellSouth's SQMs, at least on a temporary basis, the Arbitrators should reconsider their decision to require certain modifications to the SQMs. First, the vast majority of the modifications ordered by the Arbitrators were not requested by DeltaCom, which indicated in other state proceedings its willingness to accept BellSouth's SQMs without such modifications. Second, the Arbitrators' proposed modifications are unnecessary in determining whether BellSouth is complying with its obligations under the Telecommunications Act of 1996 ("1996 Act"), and some cannot reasonably be implemented. Third, in departing so tremendously from BellSouth's proposed SQM standards, benchmarks and levels of disaggregation, the Arbitrators' decision on February 23, 2001, to adopt DeltaCom's standards and benchmarks for all measurements[1] will require clarification before BellSouth can plan, prioritize and implement the required program changes to PMAP. Fourth, the Arbitrators' decision regarding Enforcement Mechanisms warrants reconsideration as to both the level of penalties and the specific components combined from DeltaCom's and BellSouth's final best offers. Finally, and most importantly, in light of the Authority's recent decision to move forward with a generic proceeding to examine Performance Measurements, BellSouth should not be required to expend the resources to implement the SQMs, many of which are unworkable and cannot feasibly be implemented in a reasonable period of time.[2] BellSouth discusses each of these points in greater detail below.

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[1] DeltaCom Final Best Offer, Tab 3, dated October 2, 2000.

[2] In the August 11,2000, Interim Order of Arbitration Award, (p 14-15) the Arbitrators found that the interconnection agreement should include performance measures and enforcement mechanisms. The Arbitrators decided that these measures and mechanisms should remain in effect permanently, or until the Authority conducts a generic proceeding to adopt permanent

As stated, BellSouth recognizes its obligations under the 1996 Act and is committed to providing comprehensive measurements by which BellSouth's performance can be judged. Indeed, BellSouth continues to update its SQMs to meet the needs of the industry, to comply with regulatory requirements, and to streamline performance reporting. However, as the FCC has cautioned, performance measurements and reporting requirements should "balance our goal of detecting possible instances of discrimination with our goal of minimizing, to the extent possible, burdens imposed on incumbent LECs." Notice of Proposed Rulemaking, *In re: Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, ¶ 36 (Apr. 17, 1998). BellSouth does not believe that the modifications to BellSouth's SQMs ordered by the Arbitrators comply with this standard, particularly when most of the ordered modifications were not even requested by DeltaCom in this arbitration. Accordingly, the Arbitrators should grant BellSouth's Motion for Reconsideration.[3]

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performance measures and enforcement mechanisms applicable to all CLECs. In the TRA's February 21st, 2001 Director's Conference, the Authority indicated that they would combine Dockets 99-00347 and 00-00392 (Generic Docket to Address Performance Measurements and Enforcement Mechanisms) transcript of Proceedings, Tr. at 19 (February 21, 2001) (Items 13-17).

[3] BellSouth is not seeking reconsideration of the Arbitrators' decision directing BellSouth to implement performance measurements that have already been developed, such as Directory Assistance Average Speed to Answer and Operator Services Speed to Answer. (Order at 15). Transcript of Proceedings, Tr. at 20-21 (April 4, 2000) (Items 11 & 12); Coon Affidavit ¶¶ 31-32. Nor is BellSouth seeking reconsideration of measurements that were under development prior to the Arbitrators' decision, such as adding cageless collocation to BellSouth's collocation performance measurements. (Order at 15-16). Transcript of Proceedings, Tr. at 20-21 (April 4, 2000) (Items 18, 19 & 20). BellSouth had previously begun work on this level of disaggregation and will include its performance with respect to cageless collocation in the SQMs. Coon Affidavit ¶¶ 38-40.

A. Most Of The Modifications To BellSouth's SQMs Ordered By The Arbitrators Were Not Requested By DeltaCom.

In this Arbitration, DeltaCom proposed a set of performance measurements and enforcement mechanisms set forth in Attachment 10 to its Petition. Petition for Arbitration of ITC^DeltaCom, Issue 1(a) at 5. According to DeltaCom witness Rozycki, DeltaCom's proposed performance measurements were based upon a set of draft performance measurements prepared by the Staff of the Texas Public Service Commission. *See* Tr. Vol. 1A at 44-45. As Mr. Rozycki acknowledged, DeltaCom's Attachment 10 did not reflect the many subsequent changes made by the Texas Staff to their proposed performance measurement set. *Id.*

In resolving this Issue, the Arbitrators did not adopt DeltaCom's Attachment 10. Instead, the Arbitrators adopted BellSouth's SQMs. However, the Arbitrators ordered a number of modifications to the SQMs, which were primarily designed to incorporate measures from the "Texas Plan," and directed that BellSouth disaggregate performance data at the state level. *See* Interim Order at 15-16, Transcript of the Proceedings, at 18-22 (April 4, 2000). The Arbitrators should reconsider this aspect of their decision because the vast majority of the Arbitrators' proposed modifications to BellSouth's SQMs as well as the state level of disaggregation were not even requested by DeltaCom.[4] While the Arbitrators could arguably have such authority in the

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[4] The Interim Order reflects that the modifications to the SQMs were developed by a comparison of the SQMs and the Texas Plan provided by BellSouth and ICG Communications, Inc. ("ICG") in Docket 99-00377. While ICG originally advocated implementation of the Texas Plan, this issue was withdrawn by ICG when BellSouth and ICG agreed to incorporate into their interconnection agreement BellSouth's SQMs and latest Voluntary Self-Effecting Enforcement Mechanism proposal ("VSEEM III"). The ICG settlement was submitted to the Authority by BellSouth and ICG on March 13, 2000.

DeltaCom never proposed the Texas Plan and never introduced it into evidence. Mr. Rozycki did attach to his prefiled direct testimony portions of an interconnection agreement between Southwestern Bell Telephone and Southside Communications, LLC, which appears to

context of a generic docket, they exceeded their authority in this arbitration, which is limited to issues raised in the Petition and Response. (§ 252 of the 1996 Act). Some examples of where the Arbitrators exceeded their authority are set forth below.

The Arbitrators ordered BellSouth to develop three additional billing performance measurements. *See* Interim Order at 15, Transcript of the Proceedings, Docket No. 99-00430, at 19 (April 4, 2000) (Items 4, 5 & 6). None of these billing measurements was included in DeltaCom's proposed performance measurements set forth in Attachment 10 to the Arbitration Petition. Coon Affidavit ¶¶ 24-26. Similarly, the Arbitrators ordered BellSouth to develop four additional measurements concerning Local Number Portability ("LNP"). *See* Interim Order at 15, Transcript of the Proceedings, Docket No. 99-00430, at 20 (April 4, 2000) (Items 13, 14, 15 & 16). None of these LNP measurements was included in DeltaCom's proposed performance measurements. Coon Affidavit ¶¶ 33-36. In total, of the twenty-five specific modifications to BellSouth's SQMs ordered by the Arbitrators upon which BellSouth seeks reconsideration, nineteen (73%) were not even requested by DeltaCom. *See generally* Coon Affidavit ¶¶ 21-50.

The Arbitrators should be particularly reluctant to order BellSouth to modify the SQMs when DeltaCom has since indicated its willingness to accept BellSouth's SQMs without such

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incorporate some of the measurements from the Texas Plan. However, Mr. Rozycki presented this exhibit merely as "evidence that performance measures should be incorporated in interconnection agreements." Direct Testimony of Christopher J. Rozycki, at 8. Mr. Rozycki did not advocate that the Authority adopt the measures set forth in this interconnection agreement, nor do the modifications ordered by the Authority correspond precisely to information in the Southwestern Bell Telephone/Southside Communications interconnection agreement. As noted in the Interim Order, on January 25, 2000, eleven weeks after the conclusion of the hearing, the Arbitrators took official notice of the ICG arbitration record that did contain the Texas Plan. (Order at 7).

modifications. For example, in the DeltaCom arbitration in Georgia in late November 1999, approximately four weeks after the Tennessee hearings, Mr. Rozycki testified as follows:

> Q. DeltaCom is asking the Georgia Commission on this Issue, 1-A, that it should adopt DeltaCom's performance measures, performance guarantees that are set forth in Attachment 10 to its petition?
>
> A. Originally that's what we've asked. In my rebuttal testimony, I've indicated that at this point in the interest of settling this issue, *we would be willing to accept the performance measures, the SQMs, of BellSouth so long as they are coupled with the guarantees that we have proposed.* I don't want to continue fighting with you over this issue of whether we should have different standards for ITC^DeltaCom versus the rest of the industry. *I would concede that your performance measures at this point have come a long way since we originally filed our petition, and that's why we are moving in that direction.* But we still hold fast on the notion that performance guarantees need to be in place.

Transcript of the Proceedings, *In re: Petition by ITC^DeltaCom Communications, Inc. for Arbitration of its Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996,* Docket No. 10854-U, Tr. at 272 (Nov. 29, 1999) (emphasis added) (excerpt attached).

In January 2000, in the BellSouth/DeltaCom arbitration proceeding in Alabama, Mr. Rozycki again elaborated on DeltaCom's willingness to accept BellSouth's SQMs, provided they were coupled with enforcement mechanisms:

> Q. Is DeltaCom asking for a separate, different set of performance measurements if there's an industry-wide set of performance measurements established?
>
> A. No, not really. In fact, we prefer the adoption of an industry-wide set of performance measures, but you have to understand that at the time of our -- that we filed this arbitration, the performance measurements that BellSouth had in hand were far from complete. Now, I think BellSouth should be commended at this point. *Since we filed in June our arbitration here, the BellSouth performance measures have moved tremendously in terms of moving towards completion. So BellSouth has done a lot of work in recent months to complete those performance measures.* I don't know

what the status is of them today. But as I've stated in other states, *we would be very willing to look at those performance measures, to adopt them as the performance measures in the interconnection agreement, and we would highly recommend that our guarantees be added to the performance measures.*

. . .

Q. And is possible that it could be significant cost involved in implementing Attachment 10 on an interim basis, only to have this Commission adopt BellSouth's SQMs in a generic proceeding six or seven months down the road?

A. There could be, but once again, I'm really interested in implementing our interconnection agreement and getting what we need in place.

...

You've made -- you, BellSouth, have made great strides in improving and completing the performance measures that were far from complete six, seven months ago when we had to make a decision to file an arbitration case. So we've been very accommodating there. *We're willing to move off that, accept those -- the SQMs, add the guarantees to them, and move forward.*

Transcript of the Proceedings, *In re: Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc.*, Docket No. 27091, Tr. Vol. I at 200-202 & 208-209 (Jan. 18, 2000) (emphasis added) (excerpt attached).

Based upon DeltaCom's expressed willingness to accept BellSouth's SQMs, together with BellSouth's agreement to implement self-effectuating penalties, the Arbitrators should reconsider their decision to require modifications to BellSouth's SQMs at this time.

B. The Arbitrators' Modifications Are Unnecessary In Determining Whether BellSouth Is Complying With Its Obligations Under the 1996 Act Or Cannot Reasonably Be Implemented.

The Arbitrators also should reconsider their resolution of Issue 1(a) because the Arbitrators' modifications to BellSouth's SQMs are unnecessary in determining whether BellSouth is complying with its obligations under the 1996 Act.

For example, although not requested by DeltaCom, the Arbitrators directed BellSouth to add a measurement from the Texas Plan to reflect "Percent of Accurate and Complete Formatted Mechanized Bills." Interim Order at 15, Transcript of Proceedings, Tr. at 19 (April 4, 2000) (Item 4). While BellSouth's SQMs measure BellSouth's performance with respect to invoice accuracy, this Texas Plan measurement would add nothing to determining whether BellSouth is rendering accurate bills to its CLEC customers. This is because the Texas Plan measurement that the Arbitrators have ordered BellSouth to develop merely captures whether all of the components of the bill have been added up correctly by the computer producing the bill, regardless of whether the amount billed is actually correct. Coon Affidavit ¶ 25. In other words, this measurement would find that BellSouth is rendering "accurate" bills, even though every rate on BellSouth's invoice may be wrong, so long as the computer "correctly" multiplied these wrong rates by the quantities ordered. Such a result would be meaningless in assessing BellSouth's billing performance.

Equally meaningless would be the Texas Plan measurement designed to capture the "percentage of missed mechanized INP conversions," which the Arbitrators directed BellSouth to add to its SQMs. Interim Order at 16, Transcript of Proceedings, Tr. at 21 (April 4, 2000) (Item 25). Interim Number Portability ("INP") is a thing of the past in Tennessee with the introduction of Local Number Portability ("LNP"). As of March 31, 2000, LNP has been implemented in 177 of the 201 wire centers in Tennessee, Coon Affidavit ¶ 45, and there is no requirement that BellSouth offer INP in those wire centers where LNP has been deployed. 47 U.S.C. § 271(c)(2)(B)(ix). The 24 Tennessee wire centers where LNP has not been implemented are located in primarily rural areas, such as Jasper, Medina, Dandridge, and Bolivar (just to name a few), which account for less than 5% of BellSouth's access lines in the State. Coon Affidavit ¶

45. Developing a performance measurement that would apply to only 12% of the wire centers serving less than 5% of BellSouth's access lines in Tennessee, where few, if any, CLECs are even competing, would make little sense. Additionally, in July 2000, the Public Utility Commission of Texas approved modifications to the Performance Remedy Plan and Performance Measurements, eliminating this measurement, *Percent of Missed Mechanized INP Conversions* (TP #116 in Version 1.6) in Version 1.7, which superceded Version 1.6.

Other measurements ordered by the Arbitrators have little or no value because of the relatively small number of transactions being measured. Specifically, the Arbitrators ordered BellSouth to add measurements to the SQMs reflecting the percentage of Bona Fide Requests processed within thirty days and the percentage of quotes provided for Bona Fide Requests within certain intervals. Interim Order at 16, Transcript of Proceedings, Tr. at 22 (April 4, 2000) (Items 29 and 30). However, during the period of January 2000 through October 2000, BellSouth received only seven Bona Fide Requests from CLECs across the entire-region. Coon Affidavit ¶¶ 49 & 50. While BellSouth could report its performance with respect to Bona Fide Requests on a manual basis, it is impossible to draw any conclusions about BellSouth's performance based upon such a limited number of transactions.[5]

Some of the measurements from the Texas Plan that the Arbitrators have directed to be added to BellSouth's SQMs have no applicability to BellSouth because these measurements reflect the manner in which SBC operates its network, which is different from the way

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[5] The limited number of Bona Fide Requests BellSouth has received this year is not unusual. For example, in its recent application for long distance authority in Texas, SBC indicated that it had received only 11 Bona Fide Requests in Texas between February 1999 and January 2000 and that it had provided quotes in response to only four of those requests. Coon Affidavit ¶¶ 49 & 50.

BellSouth's network operates. Specifically, the Arbitrators required BellSouth to add measures to capture the percentage of calls to the "Local Service Center" and "Local Operations Center" that experience a busy signal. Interim Order at 15, Transcript of Proceedings, Tr. at 19 (April 4, 2000) (Items 7 & 8). However, there is no need for either measurement here because, unlike SBC, BellSouth has engineered the trunk groups connecting the BellSouth ordering, provisioning, and repair centers so that calls are routed without experiencing blocking. This means that no busy signal is encountered by CLECs calling BellSouth's work centers. Because no busy signal is encountered, if BellSouth were required to produce the measurements defined in the Texas Plan, the report would display "zero" each month. Coon Affidavit ¶¶ 27-28. Furthermore, BellSouth already measures the time a CLEC call to its ordering, provisioning, and repair centers is in the queue, which is a more accurate reflection of BellSouth's performance in handling CLEC calls to BellSouth's work centers. *Id.*

In other instances BellSouth's SQMs and the Texas Plan measurements capture essentially the same data, albeit in a somewhat different form, and little would be gained by adding the Texas Plan measurements. This is particularly true when BellSouth's measurements are more comprehensive. For example, the Arbitrators directed BellSouth to add the Texas Plan measure reflecting the "Percent Firm Order Confirmation ("FOC") Returned With Specified Time." Interim Order at 15, Transcript of Proceedings, Tr. at 19 (April 4, 2000) (Item 2). However, this information can readily be derived from the existing FOC Timeliness measure in BellSouth's SQMs, which includes the FOC time frames supported in the Texas Plan in addition to other time frames not supported in the Texas Plan. BellSouth's FOC Timeliness measure also provides for greater disaggregation of FOC data than the Texas Plan measure. While BellSouth's

SQMs do not account for the out of hour exclusions identified in the Texas Plan, the critical FOC data presented in BellSouth's SQMs is more comprehensive. Coon Affidavit ¶ 22.[6]

Similarly, the Arbitrators directed BellSouth to add the Texas Plan measure reflecting the "Percent Mechanized Rejects Returned Within One Hour of Receipt of Reject." Interim Order at 15, Transcript of Proceedings, Tr. at 18 (April 4, 2000) (Item 2). However, BellSouth's SQMs are more comprehensive because BellSouth currently measures the percent of mechanized rejects returned within one hour of receipt, in addition those returned within 0-4 minutes, 4-8 minutes, 8-12 minutes, 12-60 minutes 1-8 hours, 8-24 hours, and greater than 24 hours. Anyone interested in knowing only the percentage of mechanized rejects returned within one hour (which seems unlikely) could readily derive this information simply by adding together the percentages reflected in the 0-4 minutes, 4-8 minutes, 8-12 minutes, and 12-60 minutes categories in BellSouth's SQMs. Coon Affidavit ¶ 23.

Reconsideration also is warranted because several of the Arbitrators' modifications to BellSouth's SQMs cannot reasonably be implemented. For example, although not requested by DeltaCom, the Arbitrators ordered BellSouth to add a measurement from the Texas Plan to reflect the "percentage of directory assistance database accuracy for manual updates." Interim Order at 16, Transcript of Proceedings, Tr. at 20-21 (April 4, 2000) (Item 23). However,

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[6] The Arbitrators' decision also is difficult to understand given that the FOC timeliness data BellSouth currently reports is more comprehensive than would be the case were BellSouth to implement the Texas Plan FOC measurement. Furthermore, the FOC Timeliness measure currently reflected in BellSouth's SQMs was ordered by both the Georgia and Louisiana Public Service Commission, and thus BellSouth is not at liberty to "remove" this measure. While BellSouth could report a different measurement for FOC timeliness for Tennessee, this would result in different data being provided to CLECs depending upon the states in which they are operating, which would complicate their ability to evaluate BellSouth's FOC performance. Coon Affidavit ¶ 21.

implementing this measurement is problematic because the data necessary to calculate this measurement would not be captured by BellSouth, but rather would be provided by DeltaCom (assuming DeltaCom was willing to do so). Coon Affidavit ¶ 43. None of BellSouth's SQMs is dependent upon data furnished by CLECs, and requiring BellSouth to determine its performance based upon such data would be inconsistent with the Arbitrators' decision to "approve the use of BellSouth data for all measurements and calculations." Transcript of Proceedings, Tr. at 22 (April 4, 2000).

The Arbitrators also directed that BellSouth disaggregate its performance data to the State (Tennessee) level. The vast majority of BellSouth's SQMs already disaggregate performance data to the State level. However, certain performance measurements only capture regional data by virtue of the regional nature of the systems or processes involved. These regional performance measurements either cannot reasonably be disaggregated at the State level or can only be disaggregated at the State level at additional time and expense, even though there is no real benefit to doing so. Coon Affidavit ¶ 52.

BellSouth's SQMs that measure the availability of BellSouth's Pre-Ordering and Maintenance & Repair interfaces provide a good example. BellSouth's Operational Support Systems ("OSS") are regional in nature, and the availability of these systems can only be reported at the regional level. Today, there is simply no way to distinguish the availability of BellSouth's OSS for a transaction from Tennessee as opposed to a transaction from another state. BellSouth's systems are either available or they are not, regardless of whether the CLEC using the system is located in Tennessee or some other BellSouth state. Coon Affidavit ¶ 54.

The difficulty of disaggregating each and every SQM to the State level is also illustrated by the SQMs that measure the Average Response Time and Response Interval for BellSouth's

Pre-Ordering and Maintenance & Repair OSS. Queries to BellSouth's Pre-Ordering and Maintenance & Repair interfaces originate from a regional Gateway to regional operations centers. In other words, pre-ordering queries from a CLEC in Florida as well as those from a CLEC in Tennessee are directed to the same regional Gateway for processing. There is currently no way to identify where the query originated from beyond this regional Gateway. In fact, many CLECs utilize regional service centers of their own, so that a CLEC customer service representative sitting in Denver, Colorado may place a pre-ordering query while on the telephone with the prospective customer in Tennessee. As a result, there is no reasonable way to determine the location of the query, which would be required to report this data at the State level. While BellSouth could attempt to trap each query received and check for the originating telephone number, queried telephone number, or queried address or appointment, doing so would be cost prohibitive, probably not very accurate, and, more importantly would drastically slow the processing time of all queries from CLECs in all states. Coon Affidavit ¶ 53.

The same is true for BellSouth's SQM that measures the Average Answer Time in BellSouth's Repair Centers. The BellSouth repair centers are regional in nature, and all CLEC calls, regardless of the state of origin, are answered in the order of receipt. There is currently no way to identify where the call originated from, which would be required to disaggregate performance data to the State level. The task is further complicated by the fact that many CLECs utilize regional service centers of their own and that BellSouth receives many repair calls from cellular telephones. While BellSouth conceivably could trap each call received and attempt to check for the originating telephone number or the telephone number or address for which repair service is being requested, this would be cost prohibitive, probably not very accurate, and would

drastically slow the processing time for repair calls from CLECs in all states. Coon Affidavit ¶ 56.[7]

BellSouth has offered and will continue to offer performance measurements that are necessary to ensure whether BellSouth is complying with its obligations under the 1996 Act, including a sufficient level of disaggregation to monitor BellSouth's performance in each State. However, the Arbitrators should decline to order measurements and disaggregation levels that do not materially aid in this effort but that impose undue burdens on BellSouth, as the FCC has cautioned. *See* Notice of Proposed Rulemaking, *In re: Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, ¶ 36 (Apr. 17, 1998). Accordingly, the Arbitrators should reconsider its resolution of Issue 1(a).

C. BellSouth Requires Clarification before the Planning, Prioritization and Implementation of New Measurements

In its February 23, 2001 Order, the Arbitrators concluded that the interconnection agreement should include performance measures and enforcement mechanisms. Thereafter, the Arbitrators adopted BellSouth's September 15, 1999 Service Quality Measurements (SQMs) and thirty (30) additional measures from the Texas Performance Plan with associated definitions and business rules.

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[7] Other data currently reported on a regional basis could conceivably be reported at the State level, such as Percent Flow-Through Service Requests and BellSouth's usage performance measurements. However, disaggregating BellSouth's usage measurements alone would cost approximately $500,000 to implement, and BellSouth is still waiting for the estimates of the costs involved in disaggregating BellSouth's flow-through data to the State level. Coon Affidavit ¶¶ 55 & 57-59. These costs seem difficult to justify given the marginal benefits associated with reporting regional flow-through and usage data at the State level.

The Second Interim Order of Arbitration Award dated August 31, 2000, directed DeltaCom and BellSouth to resubmit final best offers as to Issue 1 (a). The filing was to consist of:

1) The Electronic Medium To Be Used In Providing DeltaCom With Access To Performance Reports And Data;

2) The Process To Be Utilized In Determining BellSouth's Compliance Or Noncompliance With The Standards And/Or Benchmarks;

3) Standards and /or benchmarks for each SQM (September 15, 1999 version) and the thirty (30) additional measurements adopted. Standards must be specific. Parity or retail analog should include the specific service to which parity will be measured or the retail analog companion. Additionally, a methodology should be provided for defining or calculating the performance standard and/or benchmark, for each measure, such as the method contained in the VSEEMs for each measure;

4) The Process To Be Utilized In Determining BellSouth's Compliance Or Noncompliance With The Standards And/Or Benchmarks;

5) Circumstances that would warrant a waiver request from BellSouth and the time frame for submitting such waiver requests.

On February 6, 2001, the Authority ruled on the Best and Final offers for Issue 1(a) in the BellSouth/DeltaCom arbitration proceeding and directed BellSouth to file, within 14 days, the date on which the DeltaCom data will be available on the BellSouth web site. Given the complexity of the Arbitrators' request, BellSouth sought and received an extension until February 23, 2001 to make this filing. In the February 23, 2001 filing with the Authority, BellSouth requested clarification from the Arbitrators as to the specific levels of disaggregation, standards and/or benchmarks to apply based on the contents of Tab 3 and Tab 5 of DeltaCom's Final Best Offer.

Below, BellSouth describes the data that is currently available to DeltaCom on the BellSouth web site, as well as the data that will be available in the next software release currently

scheduled for April 15, 2001. Although BellSouth requests that the Arbitrators reconsider the addition of the Texas Plan measurements, BellSouth continues to demonstrate serious commitment to producing measurements and levels of disaggregation to support the ongoing evolution of the SQM from the September 15th 1999 SQM.

BellSouth is currently producing 43 of the 68 measurements ordered by the Arbitrators. Those measure are listed below and segregated by category:

Pre-Ordering
Average Response Time and Response Interval
Interface Availability

Ordering
Percent Flow-Through Service Request (Summary)
Percent Flow-Through Service Requests (Detail)
Flow Through Error Analysis
Percent Rejected Service Requests
Reject Interval
Firm Order Confirmation Timeliness
Speed of Answering in Ordering Center

Provisioning
Mean Held Order Interval & Distribution Intervals
Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices
Percent Missed Installation Appointments
Average Completion Interval (OCI) & Order Completion Interval Distribution
Average Completion Notice Interval
Coordinated Customer Conversions
% Provisioning Troubles w/i 30 days of Service Order Activity
Total Service Order Cycle Time (TSOCT)

Maintenance and Repair
Missed Repair Appointments
Customer Trouble Report Rate
Maintenance Average Duration
Percent Repeat Troubles w/i 30 days
Out of Service > 24 Hours
OSS Interface Availability
OSS Response Interval and Percentages
Average Answer Time – Repair Centers

Billing
Invoice Accuracy
Mean Time to Deliver Invoices
Usage Data Delivery Accuracy
Usage Data Delivery Completeness
Usage Data Delivery Timeliness
Mean Time to Deliver Usage

Operator Services (Toll) and Directory Assistance
Average Speed to Answer (Toll)
Percent Answered within "X" Seconds (Toll)
Average Speed to Answer (DA)
Percent Answered within "X" Seconds (DA)

E911
Timeliness
Accuracy
Mean Interval

Trunk Group Performance
Trunk Group Service Report
Trunk Group Service Detail

Collocation
Average Response Time
Average Arrangement Time
% of Due Dates Missed

For the Provisioning Measurements, the table shown below (Table 1) demonstrates the sub-metrics disaggregation available today on the web site and the sub-metrics disaggregation, reflecting the 9/15/99 BellSouth SQM, as directed by the Arbitrators. These report levels will be available, based on the current software release schedule, on April 15, 2001.

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TABLE 1

Current level of Disaggregation	**Level of Disaggregation on 4/15/01**
Resale Residence	Resale Residence
Resale Business	Resale Business
Resale Design	Resale Design
	Resale Centrex
	Resale ISDN
UNE Non-Design	UNE 2w Loop with NP (Non-Design)
UNE Design	UNE 2w Loop without NP (Non-Design)
	UNE 2w Loop Other with NP (Non-Design)
	UNE 2w Loop Other without NP (Non-Design)
	UNE Other (Non-Design)
	UNE 2w Loop with NP (Design)
	UNE 2w Loop without NP (Design)
	UNE 2w Loop Other with NP (Design)
	UNE 2w Loop Other without NP (Design)
	UNE Other NP (Design)
	Switching – Dispatch
	Switching – Non Dispatch
	Local Transport
	Combos – Dispatch
	Combos – Non Dispatch
Local Interconnection Trunks	Local Interconnection Trunks

For the Maintenance and Repair Measurements, the table below (Table 2) shows the sub-metrics disaggregation available today on the web site and the sub-metrics disaggregation, reflecting the 9/15/99 BellSouth SQM, as directed by the Arbitrators. These report levels will be available, based on the current software release schedule, on April 15, 2001.

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TABLE 2

Current level of Disaggregation	Level of Disaggregation on 4/15/01
Resale Residence	Resale Residence
Resale Business	Resale Business
Resale Design	Resale Design
	Resale Centrex
	Resale ISDN
UNE Non-Design	UNE 2w Loop (Non-Design)
UNE Design	UNE 2w Loop Other (Non-Design)
	UNE 2w Loop Other without NP (Non-Design)
	UNE Other (Non-Design)
	UNE 2w Loop (Design)
	UNE 2w Loop Other (Design)
	UNE Other (Design)
	Switching – Dispatch
	Switching – Non Dispatch
	Local Transport
	Combos – Dispatch
	Combos – Non Dispatch
Local Interconnection Trunks	Local Interconnection Trunks

In the February 23, 2001 Final Order of Arbitration the Arbitrators adopted, for all measurements, DeltaCom's standards and benchmarks. If the Arbitrators do not reconsider these standards and benchmarks, then BellSouth will need clarification as to the specific levels of disaggregation, standards and/or benchmarks to apply based on the contents of Tab 3 and Tab 5 of DeltaCom's Final Best Offer. For example, in Tab 5 of DeltaCom's Final Best Offer, Item B (3) references Texas SQMs and benchmarks, benchmarks from the Georgia CLEC Coalition and the Georgia Staff recommendation. This same section also references standards and benchmarks in Tab 3. In Tab 3, there is a table entitled " CLEC Performance Standards By Measure" that lists the SQM Measures as ordered by the Arbitrators on April 4, 2000. The Standard/Benchmark

column references Appendix 1 and Appendix 3 for Benchmarks and Analogs but does not address the Product level Disaggregation, Benchmarks, and Retail Analog found in Appendix 2.

BellSouth, again, suggests that any revision to the SQMs be addressed in a generic proceeding covering permanent performance measures and enforcement mechanisms. BellSouth recommends that the levels of disaggregation in the September 15, 1999, SQM are appropriate to allow the Authority to monitor non-discriminatory access.

Whenever a new performance measurement is added to BellSouth's SQMs or when the existing SQMs are modified, corresponding changes must be made to PMAP in order to generate data and reports that are appropriately disaggregated. The structure and design of the SQM is inherently linked to the programmatic design of PMAP. In adopting the September 1999 SQM on August 11, 2000, the Arbitrators inherently adopted the associated definitions and business rules for those measurements, as the Arbitrators recognized when they adopted additional measures from the Texas Performance Plan. By adopting different levels of disaggregation, standards and benchmarks, the Arbitrators are essentially effecting major programming changes to PMAP. Additionally, each new or modified performance measurement also necessitates the development of a new or different means by which to view the information on BellSouth's website, where the performance reports and underlying data are made available to CLECs. As a result, each and every addition or modification to the SQMs impacts PMAP from a developmental, operational, and systems standpoint, so what may appear to be an uncomplicated request to add a new measurement or tweak an existing measurement generally involves a much larger effort. Coon Affidavit ¶¶ 11-14. The PMAP system is extremely complex, primarily because of the sheer size of the database itself and the amount of data that must be extracted, loaded, and analyzed each month. For example, for the August 1999 production cycle, 65

million records composing 18 Gigabytes of data had to be transported and processed. To put this in perspective, one page of this document would require about 2 Kilobytes of storage. PMAP processes the equivalent of 9 million pages each month. In other words, considering that a typical case of copy paper contains 8 packages of 500 sheets each, totaling 40,000 sheets, PMAP processes approximately the equivalent of 225 cases of paper each month. In addition to monthly processing, data must be stored for multiple months in the PMAP database. The current PMAP database is approximately 2.5 Terabytes in size. This translates to 1.25 billion pages of text documents or the equivalent of 1,250 cases of paper. Because of this enormous size, the addition of any new reporting requirements must be carefully evaluated.

Complexity also arises from the fact that PMAP data feeds come from many disparate information systems that use different operating platforms, data structures, and identifier codes. Moving the data from one database to another may not be a straightforward task. For example, the date structures for one database may use a "day-month-year" format while another uses a "month-day-year" format. If there are 5 million records that must be moved from one database to the other, every one of the records must have its date structure changed before it is read into the other database. Similarly, if the record's timestamp on one system uses a timestamp that goes down to milliseconds, while another uses hundredths of a second, logic must be created to round up the timestamp before moving it into the new database. In PMAP, multiple checks such as these must be performed on all 65 million records before the data can be transported into the PMAP database.

Further, many performance reports require correlating bits and pieces of data from different groups and their associated systems within BellSouth. As an example, consider the groups performing the functions of Ordering, Provisioning, and Maintenance & Repair. Data

that is important to the Ordering group may be largely irrelevant to the Provisioning and the Maintenance and Repair groups. An example is the time stamp on the receipt of the Local Service Request (LSR) and the completion date on the Service Order. The LSR receipt time stamp is a key piece of information for the Ordering group since this group is measured on Firm Order Confirmation intervals and this measurement depends on the time the LSR is received. The LSR time stamp is not meaningful to the Provisioning Group and it is not relevant to one of the major systems used by the Provisioning Group, the Service Order Control System (SOCS.) This is because the Provisioning Group and SOCS operate on a Service Order, not an LSR. Conversely, the Service Order completion date (date when service is installed) is not captured by the systems of the Ordering Group. Yet, both the LSR receipt time stamp and the Service Order Completion date are required for the measurement of Total Service Order Cycle Time. Complication arises out of properly identifying and extracting these key bits and pieces of data from each system and associating them so that correct information can be provided. As an additional example, the identification of a certain type of product might require the extraction of characters 89-93 out of a 110-character Provisioning code and cross-referencing it against characters 20-22 of a 40 character Ordering code before the final product identification can be made. Product identification in PMAP and the appropriate levels of disaggregation require many operations similar to these examples.

Currently, PMAP is used to generate performance reports that are available to CLECs across BellSouth's region and to maintain the raw data files used to generate such reports. Reports are produced on a CLEC-specific and CLEC-aggregate basis for each BellSouth state and on a regional basis, with applicable information concerning BellSouth's retail performance. The raw data maintained in PMAP is CLEC-specific and allows each CLEC to drill down to the

individual service order or the individual trouble ticket. Each CLEC can download its raw data file and create an excel spreadsheet to assess its performance data.

PMAP is a leading data collection and reporting system. It was nominated for the 2000 Computerworld Smithsonian Award, which recognizes outstanding accomplishments in the computing field. The following language was cited in the nomination of PMAP for this award: "BellSouth's PMAP data warehouse represents an extraordinary accomplishment in transferring legacy system data elements into meaningful performance measurement information for its wholesale customers and regulators. BellSouth sets the industry standard for performance measurement data management."

The Arbitrators should reconsider this aspect of its decision because BellSouth has proposed comprehensive retail analogues and benchmarks that are based on an examination of performance data produced by BellSouth over the past two years. Most measurements are based on retail analogues where applicable, and BellSouth believes that its proposed analogues, benchmarks, and levels of disaggregation fairly balance the interests of DeltaCom and BellSouth.

BellSouth respectfully requests that the Arbitrators reconsider the thirty (30) additional measurements adopted by the Arbitrators in this proceeding. BellSouth has attempted to comply, to the extent possible, with the Order for the 30 additional measurements. It is essential that the Arbitrators understand that most of these measurements have never been produced in BellSouth. Because of the enormous expense associated with defining, developing and implementing new measurements, BellSouth requests reconsideration of the inclusion of these new measures until a final order is issued in the generic proceeding adopting permanent performance measures However, for those measurements where BellSouth has an equivalent measure or is already developing the measure, the Implementation Date column represents the targeted dates based on

BellSouth's best estimate at this time. If the Arbitrators do not elect to reconsider the addition of the 30 measurements from the Texas Plan, BellSouth requests the Arbitrators to consider the following implementation dates for these Measurements, which are based on BellSouth's most recent estimates.

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TABLE 3

Performance Measurement	Texas Number	Implementation Date
Percent Firm Order Confirmation Returned within specified time	TP#5	3Q 2001
Percent Mechanized Rejects Returned within one hour of receipt of reject in LASR	TP#10	3Q 2001
Percent of Accurate and Complete Formatted Mechanized Bills	TP#15	4Q 2001
Billing Completeness	TP#17	4Q 2001
Unbillable Usage	TP#20	1Q 2002
Percent Busy in the Local Service Center	TP#23	3Q 2001
Percent Busy in the Local Operations Center	TP#26	3Q 2001
Percent Installations Completed within Industry Guidelines for LNP with Loop	TP#56.1	3Q 2001
Average Response Time for Loop Makeup Information	TP#57	4Q 2001
Directory Assistance Average Speed of Answer	TP#80	2Q 2001
Operator Services Speed of Answer	TP#82	2Q 2001
Percentage of LNP Only Due Dates within Industry Guidelines	TP#91	1Q 2002
Percentage of Time the Old Service Provider Releases the Subscription Prior to the Expiration of the second 9 Hour (T2) Timer	TP#92	1Q 2002
Percentage of Customer Account Restructured Prior to LNP Due Date	TP#93	1Q 2002
Percentage Pre-mature Disconnects for LNP Orders	TP#96	1Q 2002
Average Days Required to Process a Request	TP#106	3Q 2001
Cageless Collocation to the Level of Disaggregation on BST's SQM "Collocation Average Response Time"	Revised 1999 SQM	2Q 2001
Cageless Collocation to the Level of Disaggregation on BST's SQM "Collocation Average Arrangement Time"	Revised 1999 SQM	2Q 2001
Cageless Collocation to the Level of Disaggregation on BST's SQM "Collocation Percent of Due Dates Missed"	Revised 1999 SQM	2Q 2001
Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs	TP#110	4Q 2001
Average Update Interval for DA Database for Facility Based CLECs	TP#111	4Q 2001
Percentage of DA Database Accuracy for Manual Updates	TP#112	1Q 2002
Percentage of Premature Disconnects (Coordinated Cutovers)	TP#114	3Q 2001
Percentage of Missed Mechanized INP Conversions	TP#116	4Q 2001
Percent NXXs loaded and tested prior to the LERG effective date	TP#117	4Q 2001
Average Delay Days for NXX Loading and Testing	TP#118	4Q 2001
Mean Time to Repair NXX Trbl. Reports	TP#119	4Q 2001
Percentage of Requests Processed within 30 Business Days	TP#120	2Q 2001
Percentage of Quotes Provided for Authorized BFRs/Special Requests within X (10,30,90) Days	TP#121	2Q 2001

D. The Arbitrators Decision Regarding Enforcement Mechanisms

The Arbitrators decision regarding Enforcement Mechanism warrants reconsideration as to both the level of the penalties and the specific plan components have been combined from DeltaCom's and BellSouth's final best offers.[8] Any measurement plan, statistical testing methodology, and enforcement mechanism must be designed to work together as a unit. The Enforcement Mechanism plan depends upon data from the measurement plan. The statistical methodology must be designed according to the type of data to be statistically tested and the statistical output must conform to the application of the statistical test in the enforcement plan. The parts of one overall plan of measurement, statistical testing and enforcement are generally not interchangeable with portions from another plan. This is, however, exactly what the Authority appears to have ordered.[9]

BellSouth agrees with the Arbitrators' decision regarding the appropriate statistical methodology (Truncated Z). The Arbitrators, however, while recognizing that BellSouth's methodology is more detailed and provides continuity with the enforcement mechanisms,[10] appears to have adopted the fee schedule of a remedy plan based upon a per measure failure rather than a per transaction or per item basis as BellSouth proposed in it's Tier 1 and Tier 2 Enforcement Mechanism Payments. The Enforcement Mechanism BellSouth proposed includes

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[8] As set forth in earlier pleadings in this proceeding, BellSouth believes the Arbitrators do not have authority to impose penalties. BellSouth's proposal to voluntarily agree to certain enforcement mechanisms should not be deemed a waiver of its position that the Arbitrators cannot, as a matter of law, impose penalties.

[9] "Because there is a wide range between BellSouth's and DeltaCom's proposals and in order to provide an equitable amount of balance and fairness to the parties, the Arbitrators find that the best outcome would result from a combination of DeltaCom's and BellSouth's final best offers." (TRA Final Order of Arbitration p.9 Feb. 23, 2001)

the concept of a fee schedule that is based on a per transaction or per item basis. The Enforcement Mechanism adopted by the Arbitrators appears to have a fee schedule that is based on a per measure failure.

The key difference between an enforcement mechanism that pays penalties on a per transaction or per item basis versus a per measure basis is that the per transaction or item penalty compensates the CLEC for specific acts of parity failure. A per measure mechanism is punitive. Because a per measure mechanism is a flat rate penalty, paid whether there is 1 failure or 100, there is no incentive for BellSouth to prevent the second occurrence of the parity failure. To date, the Louisiana Public Service Commission (LPSC) in Docket No. U-22252, Subdocket C, the Georgia Public Service Commission in Docket No. 7892-U have adopted an Enforcement Mechanism Plan that is based on a per transaction penalty. It is unclear to BellSouth if the Authority adopted BellSouth's level of disaggregation for enforcement or DeltaCom's. As outlined in the tables below (Tables 4 and 5), there is a question as to whether the Enforcement Mechanism would be administered with BellSouth's Tier 1 and Tier 2 submetrics or DeltaCom's.

TABLE 4

SEEM Tier 1 Submetrics	**Level of Disaggregation for Ordering, Provisioning, Maintenance and Repair as listed in DeltaCom's Final Best Offer, Tab 3, Appendix 2**
FOC Timeliness (Mechanized only)	Resold Residence POTS
Average Reject Interval (Mechanized only)	Resold Business POTS
Order Completion Interval (Dispatch only) – Resale POTS	Resold BRI ISDN
Order Completion Interval (Dispatch only) – Resale Design	Resold PRI ISDN
Order Completion Interval (No Dispatch only) – UNE Loop and Port	Resold Centrex/ Centrex-like
Order Completion Interval ('w' code orders, Dispatch only) – UNE Loops	Resold Analog PBX trunks

[10] TRA Final Order of Arbitration p.6 (Feb. 23, 2001)

SEEM Tier 1 Submetrics	Level of Disaggregation for Ordering, Provisioning, Maintenance and Repair as listed in DeltaCom's Final Best Offer, Tab 3, Appendix 2
Order Completion Interval (Dispatch only) – IC Trunks	Resold DID Trunks
Percent Missed Installation Appointments – Resale POTS	Resold Voice-Grade Private Line
Percent Missed Installation Appointments – Resale Design	Resold DS1 Services
Percent Missed Installation Appointments – UNE Loop and Port Combos	Resold DS3 Services
Percent Missed Installation Appointments – UNE Loops	Resold >DS3 Services
Percent Provisioning Troubles within 4 Days - Resale POTS	Other Resold Services
Percent Provisioning Troubles within 4 Days - Resale Design	UNE Platform
Percent Provisioning Troubles within 4 Days - UNE Loop and Port	UNE Channelized DS1 (DS1 loop + multiplexing)
Percent Provisioning Troubles within 4 Days - UNE Loops	Unbundled 8dB Analog Loops
Customer Trouble Report Rate – Resale POTS	Unbundled 2-wire Digital Loops
Customer Trouble Report Rate – Resale Design	Unbundled 4-wire Digital Loops
Customer Trouble Report Rate - UNE Loop and Port Combos	Unbundled ADSL Loops
Customer Trouble Report Rate - UNE Loops	Unbundled HDSL Loops
Percent Missed Repair Appointments – Resale POTS	Unbundled xDSL Loops
Percent Missed Repair Appointments - Resale Design	Other Unbundled Loops
Percent Missed Repair Appointments - UNE Loop and Port Combos	UNE Analog Switch Port (line side)
Percent Missed Repair Appointments - UNE Loops	UNE BRI Capable Switch Port (line side)
Maintenance Average Duration – Resale POTS	UNE DS1 Switch Port (line side)
Maintenance Average Duration – Resale Design	UNE PR1 Switch Port (trunk side)
Maintenance Average Duration - UNE Loop and Port Combos	UNE DID-capable Switch Port (trunk side)
Maintenance Average Duration - UNE Loops	UNE Message Trunk Port
Maintenance Average Duration – IC Trunks	UNE Dedicated DS0 Transport
Percent Repeat Troubles within 30 Days – Resale POTS	UNE Dedicated DS1 Transport
Percent Repeat Troubles within 30 Days – Resale Design	UNE Dedicated DS3 Transport
Percent Repeat Troubles within 30 Days - UNE Loop and Port Combos	Interconnect Trunks (DS0s, DS1s, and DS3s)
Percent Repeat Troubles within 30 Days - UNE Loops	Two-Way Trunking, Inbound Augments,
Percent Trunk Blockage	ILNP
LNP Disconnect Timeliness	PNP or LNP
LNP Percent Missed Installation Appointment	Line-sharing/High Frequency Spectrum UNE
Coordinated Customer Conversions for UNE Loops	Sub-loop unbundling, e.g. network terminating
Coordinated Customer Conversions for LNP	Loop Modification/Loop Conditioning
Percent Missed Collocation Due Dates	

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TABLE 5

SEEM Tier 2 Submetrics	Level of Disaggregation for Ordering, Provisioning, Maintenance and Repair as listed in DeltaCom's Final Best Offer, Tab 3, Appendix 2
Percent Response Received within "X" seconds – Pre-Order OSS	Resold Residence POTS
OSS Interface Availability	Resold Business POTS
Order Process Percent Flow-Through (Mechanized only)	Resold BRI ISDN
Order Completion Interval (Dispatch only) – Resale POTS	Resold PRI ISDN
Order Completion Interval (Dispatch only) – Resale Design	Resold Centrex/ Centrex-like
Order Completion Interval (No Dispatch only) – UNE Loop and Port	Resold Analog PBX trunks
Order Completion Interval ('w' code orders, Dispatch only) – UNE Loops	Resold DID Trunks
Order Completion Interval (Dispatch only) – IC Trunks	Resold Voice-Grade Private Line
Percent Missed Installation Appointments – Resale POTS	Resold DS1 Services
Percent Missed Installation Appointments – Resale Design	Resold DS3 Services
Percent Missed Installation Appointments – UNE Loop and Port Combos	Resold >DS3 Services
Percent Missed Installation Appointments – UNE Loops	Other Resold Services
Percent Provisioning Troubles within 4 Days - Resale POTS	UNE Platform
Percent Provisioning Troubles within 4 Days - Resale Design	UNE Channelized DS1 (DS1 loop + multiplexing)
Percent Provisioning Troubles within 4 Days - UNE Loop and Port	Unbundled 8dB Analog Loops
Percent Provisioning Troubles within 4 Days - UNE Loops	Unbundled 2-wire Digital Loops
Customer Trouble Report Rate – Resale POTS	Unbundled 4-wire Digital Loops
Customer Trouble Report Rate – Resale Design	Unbundled ADSL Loops
Customer Trouble Report Rate - UNE Loop and Port Combos	Unbundled HDSL Loops
Customer Trouble Report Rate - UNE Loops	Unbundled xDSL Loops
Percent Missed Repair Appointments – Resale POTS	Other Unbundled Loops
Percent Missed Repair Appointments - Resale Design	UNE Analog Switch Port (line side)
Percent Missed Repair Appointments - UNE Loop and Port Combos	UNE BRI Capable Switch Port (line side)
Percent Missed Repair Appointments - UNE Loops	UNE DS1 Switch Port (line side)
Maintenance Average Duration – Resale POTS	UNE PR1 Switch Port (trunk side)
Maintenance Average Duration – Resale Design	UNE DID-capable Switch Port (trunk side)
Maintenance Average Duration - UNE Loop and Port Combos	UNE Message Trunk Port
Maintenance Average Duration - UNE Loops	UNE Dedicated DS0 Transport
Maintenance Average Duration – IC Trunks	UNE Dedicated DS1 Transport
Percent Repeat Troubles within 30 Days – Resale POTS	UNE Dedicated DS3 Transport
Percent Repeat Troubles within 30 Days – Resale Design	Interconnect Trunks (DS0s, DS1s, and DS3s)
Percent Repeat Troubles within 30 Days - UNE Loop and Port Combos	Two-Way Trunking, Inbound Augments,
Percent Repeat Troubles within 30 Days - UNE Loops	ILNP
Billing Timeliness	PNP or LNP
Billing Accuracy	Line-sharing/High Frequency Spectrum UNE
Usage Data Delivery Timeliness	Sub-loop unbundling, e.g. network terminating

SEEM Tier 2 Submetrics	Level of Disaggregation for Ordering, Provisioning, Maintenance and Repair as listed in DeltaCom's Final Best Offer, Tab 3, Appendix 2
Usage Data Delivery Accuracy	Loop Modification/Loop Conditioning
Percent Trunk Blockage	
LNP Disconnect Timeliness	
LNP Percent Missed Installation Appointment	
Coordinated Customer Conversions for UNE Loops	
Coordinated Customer Conversions for LNP	
Percent Missed Collocation Due Dates	

It is unclear to BellSouth what components of the Enforcement Mechanism Plan the Authority is utilizing from each proposal, including whether the Authority intended to "provide an equitable amount of fairness" only by providing modifications to the liquidated damages and voluntary payments tables for Tier 1 and Tier 2. If so, the Enforcement Mechanism penalties have been adjusted to excessive levels that are not in proportion, on a per transaction basis, to any harm BellSouth may cause a CLEC by a parity failure. The following three examples demonstrate some of the potential problems from this decision and why the Authority should implement BellSouth's proposed plan:

1. Pre-Ordering OSS Average Response Time

Taking DeltaCom's benchmarks for *Pre-Ordering OSS Average Response Time*, as an example, it is easy to see where a transaction based Enforcement Mechanism, such as BellSouth's, pays astronomical penalties when applying the per measure analysis ordered by the Authority.

Specifically, CLECs and BST service reps obtain information about a particular telephone number/account by querying various Navigator contracts. Some of the basic information on the Customer Service Record (CSR) includes the end user's listed name, address, class of service (residence, business, flat rate, message rate, etc.) and all telephone numbers and

features, which are associated with that account. For commercial customers, business listings and Yellow Page Headings are included as well as "hunting" information. A CLEC, as part of the normal 4-5 day business process of processing a resold service would utilize an electronic interface such as LENS or TAG to query for this information. Clearly, a few seconds during this process would not impact the CLECs ability to compete with BellSouth.

For example, the Arbitrators adopted DeltaCom's benchmark of 5 seconds rather than the BellSouth proposal of Parity + 4 seconds, the time the FCC has allowed as reasonable for OSS firewall security. In July 2000, BellSouth processed 148,978 CLEC CSR queries in an overall average of 7.64 seconds. Although 55.11% of these queries occurred in $\leq$ 6.3 seconds, 44.89 % or 66,876 of these queries would have missed the 5 second benchmark. If only 10% or 6,687 of these CSR queries were from DeltaCom in TN, using the BellSouth Enforcement Methodology for this one measure, *Pre-Ordering OSS Average Response Time*, for CSR, with a Benchmark of 5 seconds, BellSouth has calculated the July 2000 payout, based on the remedy amounts in Table 1 of Exhibit A would have been (6687 units) *($2500/unit) = $16,717,500. Clearly, the penalty proposed by the Arbitrators is excessive and punitive for any damage a few seconds delay would have caused.

2. Percent Firm Order Confirmation (FOC) Returned

Similarly, the Arbitrators, having ordered DeltaCom benchmarks for *Percent Firm Order Confirmation (FOC) Returned,* can see in this instance where a transaction based Enforcement Mechanism, such as BellSouth's, provides an opportunity for a CLEC to create a substantial revenue stream of penalties by gaming the system. The DeltaCom benchmark for this measure is all Residence and Business 95% within 5 hours. By creating circumstances, such as issuing

orders very late in the business day, that by design may fallout for manual handling, the CLEC can attempt to create a daily revenue stream based on remedies.

3. Missed Installation Appointments (MIA) for Resale POTS.

Note – the statistical results are only illustrative. They are not a result of a statistical test of this data.

TABLE 6

	n_I	N_C	I_c	MIA_I	MIA_C	z^T_{CLEC-1}	C_B	Parity Gap	Volume Proportion	Affected Volume
State	50000	600	96	9%	16%	-1.92	-0.21	1.71	0.4275	
Cell						z_{CLEC-1}				
1		150	17	0.091	0.113	-1.994				8
2		75	8	0.176	0.107	0.734				
3		10	4	0.128	0.400	-2.619				2
4		50	17	0.158	0.340	-2.878				8
5		15	2	0.245	0.133	1.345				
6		200	26	0.156	0.130	0.021				
7		30	7	0.166	0.233	-0.600				3
8		20	3	0.106	0.150	-0.065				2
9		40	9	0.193	0.225	-0.918				4
10		10	3	0.160	0.300	-0.660				2
										29

where n_I = ILEC observations and n_C = CLEC-1 observations

The Arbitrators, having ordered DeltaCom benchmarks for *Missed Installation Appointments (MIA) for Resale POTS,* can see in the this instance where a transaction based Enforcement Mechanism, such as BellSouth's, pays punitive penalties at the levels ordered by the Authority.

The remedy associated with *Missed Installation Appointments (MIA)* is an enforcement consequence similar to that provided to BellSouth retail customers. When BellSouth misses an installation appointment for it's end users, an installation charge is often waived – if the end user requests it. For DeltaCom, BellSouth is voluntarily and automatically providing this type of

remedy. $100 per missed installation appointment is reasonable, when one considers the installation is most likely completed the next day. However the penalty proposed by the Arbitrators is particularly punitive and far beyond any harm that a missed appointment would cause, as in the following example.

Based on BellSouth Methodology, the payout for DeltaCom is (29 units) * ($100/unit) = $2,900. Using the dollar amount proposed by the Arbitrators in the Liquidated Damages Table for Tier –1 measures[11] the Payout for DeltaCom is (29 units) * ($2500/unit) = $72,500. This amount is in addition to the revenue provided by the customer to the CLEC. The amount of $2500 is excessive for each miss. As an example, the highest rate for residence service in TN is $12.15 per month. That is the expected revenue for this service on a monthly basis to the CLEC. If the penalty for a missed installation appointment is $2500, that is over 198 times the monthly value of the service and is equivalent to over 16 years of revenue to the CLEC for one customer alone.

Using BellSouth methodology and payments for the second month of noncompliance, the payout for CLEC-1 is (29 units) * ($125/unit) = $3625

Using the dollar amount proposed by the Arbitrators, the payout for CLEC-1 is (29 units) * ($5000/unit) = $145,000. The amount of $5000 is extremely excessive for each miss. Again, this amount is in addition to the revenue provided by the customer to the CLEC.

BellSouth respectfully requests that the Arbitrators reconsider the penalties tables for Tier 1 and Tier 2. The BellSouth proposed Standards and Benchmarks, along with the Statistical Methodology and Enforcement Mechanisms, including the voluntary self-effectuating penalty

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[11] TRA Final Order of Arbitration Exhibit A Feb. 23, 2001

payments tables for Tier 1 and Tier 2 were designed to work as a complete package, providing measurements based on retail analogues where applicable, and BellSouth believes that its proposed analogues, benchmarks, levels of disaggregation and enforcement plan fairly balance the interests of the CLEC community and BellSouth.

E. BellSouth Should Not Be Required To Modify Its SQMs Until The Authority Has Conducted A Generic Proceeding To Examine Performance Measurements For The Entire Industry.

In adopting BellSouth's SQMs as modified, the Arbitrators indicated the possibility that the Authority would adopt different "measurements and enforcement mechanisms in another proceeding ...." Transcript of Proceedings, Tr. at 18 (April 4, 2000). In the TRA's February 21st, 2001 Director's Conference, the Authority indicated that they would combine Dockets 99-00347 and 00-00392 (Generic Docket to Address Performance Measurements and Enforcement Mechanisms) transcript of Proceedings, Tr. at 19 (February 21, 2001). BellSouth requests that the Authority review these issues in the generic docket and not mandate BellSouth to expend the resources implementing modifications to its SQMs, until the Authority has had the benefit of the industry's viewpoints on such modifications in a generic proceeding.

Implementing new performance measurements or modifying the existing SQMs involves substantial time and resources. Rather, BellSouth must have the systems in place to enable it to collect, process, and report the data that corresponds to the performance being measured. Every addition or modification to BellSouth's SQMs requires enhancements or changes to PMAP. Coon Affidavit ¶¶ 5 & 9.

The PMAP system is extremely complex. The sheer size of the database itself and the amount of data that must be extracted, loaded, and analyzed each month is staggering. The current PMAP database stores the equivalent of 1.25 billion pages of text documents, and more

than 65 million records are processed each month. Coon Affidavit ¶ 6. In addition, PMAP must join together data from different information systems that use different operating platforms, data structures, and identifier codes, which is a difficult undertaking. Coon Affidavit ¶ 7.[12] PMAP also must correlate bits and pieces of data from different working groups within BellSouth, each of which uses different systems that capture different information. Coon Affidavit ¶ 8.[13]

In order to implement the modifications to BellSouth's SQMs ordered by the Arbitrators, BellSouth would have to make substantial enhancements to PMAP, in addition to developing new system capabilities that presently do not exist within BellSouth. BellSouth estimates that the cost of these enhancements and development efforts would be approximately $4.2 million. Coon Affidavit ¶ 51. Little use would be served in committing such substantial resources to implementing modifications to BellSouth's SQMs for a single CLEC, especially given the need for an industry-wide workable plan.

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[12] For example, the date structures for one database may use a "day-month-year" format while another uses a "month-day-year" format. If there are 5 million records that must be moved over from one database to the other, every one of the records must have its date structure changed before it is read into the other database. Similarly, if the record's timestamp on one system uses a timestamp that goes down to milliseconds, while another uses hundredths of a second, logic must be created to round up the timestamp before moving it into the new database. In PMAP, multiple checks like these must be made on all 65 million records, and adjustments done before the data can be transported into the PMAP database. Coon Affidavit ¶ 7.

[13] For example, data that is important to the Ordering group may be largely irrelevant to the Provisioning group, which means that the data systems used by the Provisioning group may capture very little of this "irrelevant" data. Complication arises out of properly identifying and extracting these key bits and pieces of data from each system and associating them so that correct information can be provided. For example, to identify a certain type of product might require the extraction of characters 89-93 out of a 110-character Provisioning code and cross reference it against characters 20-22 of a 40 character Ordering code before the final product identification can be made. Product identification in PMAP and the appropriate levels of disaggregation require many types of these operations. Coon Affidavit ¶ 8.

BellSouth can only be completely sure that it is in compliance with the Arbitrators' order once the Arbitrators provide the clarification on the issues raised by BellSouth. Once the clarification BellSouth has requested has been provided, the modifications to BellSouth's SQMs ordered by the Arbitrators can be implemented, starting in the second quarter of 2001. While some of these modifications require programming work that could be completed in three to six months, much of what the Arbitrators ordered is currently available. The enhancements to PMAP currently underway are extensive and require considerable resources to implement. For example, the replacements and upgrades necessary to increase the capacity of PMAP alone will cost approximately $2 to $3 million. Coon Affidavit ¶ 15. Enhancements that were completed in December 2000, have allowed development work for performance measurements and modifications to existing measurements that have been ordered by the GA PSC Docket 7892-U on January 16, 2001. Coon Affidavit ¶ 18.[14]

This means that, before BellSouth can even implement the modifications ordered in this arbitration, the Authority could conduct a generic performance measurements and enforcement mechanisms docket to determine what, if any, changes need to be made to BellSouth's SQMs for the entire CLEC industry. Even DeltaCom requested, in their Final Best Offer, to submit Version 1.7 for incorporation into the performance remedy plan. This docket could also examine recent

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[14] While conceivably BellSouth could stop work currently underway in order to implement the modifications ordered by the Arbitrators, BellSouth's doing so would have any number of undesirable consequences. For example, the ability of CLECs to continue to obtain timely performance reports and raw data may be adversely affected. In addition, BellSouth's ability to implement new Rule 319 measurements would be delayed, even though it is obligated and has been requested by numerous CLECs to make these measurements available. Furthermore, while BellSouth is prepared to include SEEM in its interconnection agreement with DeltaCom, implementation of this proposal would be delayed if work on the enhancements to PMAP currently underway were temporarily halted. Coon Affidavit ¶ 19.

Performance Measurement and Enforcement Plan decisions in Georgia and Louisiana, work under way in Florida as well as examine decisions[15] by the Public Utility Commission of Texas approving modifications to the Performance Remedy Plan and Performance Measurements, eliminating the following measurements from Version 1.6: *Unbillable Usage* (TP #20), *Average Response Time for Loop Makeup Information* (TP #57), *Percentage of Missed Mechanized INP Conversions* (TP #116), and *Mean Time to Repair NXX Trouble Reports* (TP #119) in Version 1.7, which superceded Version 1.6.

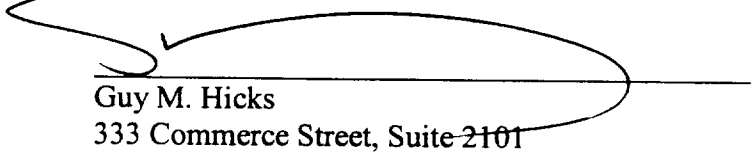
Such a procedure makes considerably more sense than requiring BellSouth to implement costly and time consuming modifications to BellSouth's SQMs – modifications that were not even requested by DeltaCom and may not be what the CLEC industry wants or needs.

III. CONCLUSION

For the foregoing reasons, the Arbitrators should grant BellSouth's Motion for Reconsideration and Clarification.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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[15] Public Utility Commission of Texas, Project No. 20400, Order No. 13, Project No. 22165, Order No. 15.

Atlanta, GA 30375-0001

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

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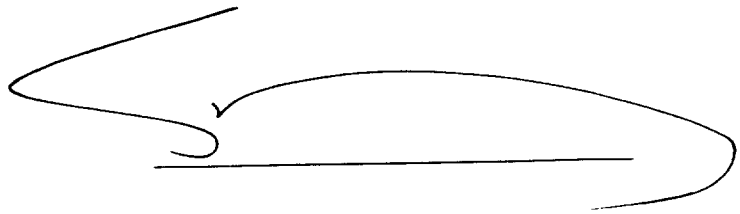

ATTACHMENT 1

BELLSOUTH®

BellSouth Service Quality Measurement Plan (SQM)

Tennessee Performance Metrics

Measurement Descriptions
Version 0.01

Issue Date: March 12, 2001

Introduction

The BellSouth Service Quality Measurement Plan (SQM) describes in detail the measurements produced to evaluate the quality of service delivered to BellSouth's customers both wholesale and retail. The SQM was developed to respond to the requirements of the Communications Act of 1996 Section 251 (96 Act) which required BellSouth to provide non-discriminatory access to Competitive Local Exchange Carriers (CLEC)[1] and its 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 (orders of 12/30/97 and 1/12/01 in Docket 7892-U), LCUG 1-7.0, the FCC's NPRM (CC Docket 98-56 RM9101 04/17/98), the Louisiana Public Service Commission (LPSC) Order (Docket U-22252 Subdocket C 04/19/98), numerous arbitration cases, LPSC sponsored collaborative workshops (10/98-02/00), and proceedings in Alabama, Mississippi, and North Carolina have and continue to influence the SQM.

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 changed to reflect changes in systems, correct errors, and respond to both 3rd Party audit requirements.

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

Once it is approved, the most current copy of this document can be found on the web at URL: https://pmap.bellsouth.com in the Help folder.

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

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Contents

Section 1: Operations Support Systems (OSS)

OSS-1: Average Response Time and Response Interval (Pre-Ordering/ Ordering)

Definition

Average response time and response intervals are the average times and number of requests responded to within certain intervals for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for Telephone numbers (TNs), and Customer Service Records (CSRs).

Exclusions

None

Business Rules

The average response time for retrieving pre-order/order information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month.

The response interval starts when the client application (LENS or TAG for CLECs and RNS or ROS for BellSouth) submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number of accesses to the legacy systems during the reporting period which take less than 2.3 seconds, the number of accesses which take more than 6 seconds, and the number which are less than or equal to 6.3 seconds are also captured.

Calculation

Response Time = (a - b)

- a = Date & Time of Legacy Response
- b = Date & Time of Legacy Request

Average Response Time = c ÷ d

- c = Sum of Response Times
- d = Number of Legacy Requests During the Reporting Period

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • Legacy Contract (per reporting dimension) • Response Interval • Regional Scope	• Report month • Legacy Contract (per reporting dimension) • Response Interval • Regional Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• **RSAG – Address** (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system. • **RSAG – TN** (Regional Street Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system. • **ATLAS** (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system. • **COFFI** (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system. • **DSAP** (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system. • **HAL/CRIS** (Hands-Off Assignment Logic/Customer Record Information System) – a system used to access the Business Office Customer Record Information System (BOCRIS). It allows BellSouth servers, including LENS, access to legacy systems. CLECs query this legacy system. • **P/SIMS** (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system. • **OASIS** (Obtain Available Services Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system.	• Parity + 4 seconds.

Table 1: Legacy System Access Times For RNS

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤ 6.3 sec.	Avg. Sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
CRIS	CRSACCTS	CSR	x	x	x	x	x
OASIS	OASISBSN	Feature/Service	x	x	x	x	x
OASIS	OASISCAR	Feature/Service	x	x	x	x	x
OASIS	OASISLPC	Feature/Service	x	x	x	x	x
OASIS	OASISMTN	Feature/Service	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 2: Legacy System Access Times For R0S

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
CRIS	CRSOCSR	CSR	x	x	x	x	x
OASIS	OASISBIG	Feature/Service	x	x	x	x	x

Table 3: Legacy System Access Times For LENS

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
HAL	HAL/CRIS	CSR	x	x	x	x	x
COFFI	COFFI/USOC	Feature/Service	x	x	x	x	x
P/SIMS	PSIMS/ORB	Feature/Service	x	x	x	x	x

Table 4: Legacy System Access Times For TAG

System	Contract	Data	< 2.3 sec.	> 6 sec.	≤6.3 sec.	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x	x	x	x
RSAG	RSAG-ADDR	Address	x	x	x	x	x
ATLAS	ATLAS-TN	TN	x	x	x	x	x
ATLAS	ATLAS-MLH	TN	x	x	x	x	x
ATLAS	ATLAS-DID	TN	x	x	x	x	x
DSAP	DSAP-DDI	Schedule	x	x	x	x	x
CRIS	CRSEINIT	CSR	x	x	x	x	x
CRIS	CRSECSR	CSR	x	x	x	x	x

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

Note: CLEC specific data is not available in this measure. Queries of this sort do not have company specific signatures.

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• **RSAG – Address** (Regional Street Address Guide-Address) – stores street address information used to validate customer addresses. CLECs and BellSouth query this legacy system. • **RSAG – TN** (Regional Street Address Guide-Telephone number) – contains information about facilities available and telephone numbers working at a given address. CLECs and BellSouth query this legacy system. • **ATLAS** (Application for Telephone Number Load Administration and Selection) – acts as a warehouse for storing telephone numbers that are available for assignment by the system. It enables CLECs and BellSouth service reps to select and reserve telephone numbers. CLECs and BellSouth query this legacy system. • **COFFI** (Central Office Feature File Interface) – stores information about product and service offerings and availability. CLECs query this legacy system. • **DSAP** (DOE Support Application) – provides due date information. CLECs and BellSouth query this legacy system. • **HAL/CRIS** (Hands-Off Assignment Logic/Customer Record Information System) – a system used to access the Business Office Customer Record Information System (BOCRIS). It allows BellSouth servers, including LENS, access to legacy systems. CLECs query this legacy system. • **P/SIMS** (Product/Services Inventory Management system) – provides information on capacity, tariffs, inventory and service availability. CLECs query this legacy system. • **OASIS** (Obtain Available Services Information Systems) – Information on feature and rate availability. BellSouth queries this legacy system.	• Percent Response Received within 6.3 seconds: > 95%

SEEM OSS Legacy Systems

System	BellSouth	CLEC
Telephone Number/Address		
RSAG	RNS, ROS	TAG, LENS
Atlas	RNS,ROS	TAG, LENS
DSAP	RNS, ROS	TAG, LENS
CSR Data		
CRSACCTS	RNS	
CRSOCSR	ROS	
HAL/CRIS		LENS
CRSE INIT		TAG
CRSOCSR		TAG
Service/Feature Availability		
OASISBSN	RNS	
OASISCAR	RNS	
OASISLPC	RNS	

System	BellSouth	CLEC
OASISMTN	RNS	
OASISBIG	RNS, ROS	
COFFI/USOC		LENS
PSIMS/ORB		LENS

OSS-2: Interface Availability (Pre-Ordering/Ordering)

Definition

Percent of time OSS interface is functionally available compared to scheduled availability. Availability percentages for CLEC interface systems 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.)

Scheduled availability is posted on the ICS Operations internet site: (www.interconnection.bellsouth.com/oss/osshour.html)

Exclusions

None

Business Rules

This measurement captures the availability percentages for the BellSouth systems, which are used by CLECs during Pre-Ordering functions. Comparing the percentages to BellSouth results allows conclusions as to whether an equal opportunity exists for the CLEC to deliver a comparable customer experience.

Note: Only full outages are used in the calculation of Application Availability.

A full outage is incurred when any of the following circumstances exist:

- The application or system is down.
- The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
- More than one work center cannot access the application or system for any reason.
- When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.
- When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable.

Calculation

Interface Availability (Pre-Ordering/Ordering) = (a ÷ b) X 100

- a = Functional Availability
- b = Scheduled Availability

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
Report month • Legacy Contract Type (per reporting dimension) • Regional Scope • Hours of Downtime	Report month • Legacy Contract Type (per reporting dimension) • Regional Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Regional Level	• ≥ 99.5%

OSS Interface Availability

OSS Interface	Applicable to	% Availability
EDI	CLEC	x
HAL	CLEC	x
LENS	CLEC	x
LEO Mainframe	CLEC	x
LEO UNIX	CLEC	x
LESOG	CLEC	x
PSIMS	CLEC	x
TAG	CLEC	x
ATLAS/COFFI	CLEC/BellSouth	x
BOCRIS	CLEC/BellSouth	x
DSAP	CLEC/BellSouth	x
RSAG	CLEC/BellSouth	x
SOCS	CLEC/BellSouth	x
SONGS	CLEC/BellSouth	x
RNS	BellSouth	Under Development
ROS	BellSouth	Under Development

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Regional Level	• ≥ 99.5%

SEEM OSS Interface Availability

OSS Interface	Applicable to	% Availability
EDI	CLEC	x
HAL	CLEC	x
LENS	CLEC	x
LEO Mainframe	CLEC	x
LEO UNIX	CLEC	x
LESOG	CLEC	x
PSIMS	CLEC	x
TAG	CLEC	x

OSS-3: Interface Availability (Maintenance & Repair)

Definition

This measures the percentage of time the OSS Interface is functionally available compared to scheduled availability. Availability percentage for the CLEC and BellSouth interface systems and for the legacy systems accessed by them are captured.

Exclusions

None

Business Rules

This measure is designed to compare the OSS availability versus scheduled availability of BellSouth's legacy systems.

Note: Only full outages are used in the calculation of Application Availability. A full outage is incurred when any of the following circumstances exists:

- The application or system is down.
- The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
- More than one work center cannot access the application or system for any reason.
- When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.
- When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable.

Calculation

OSS Interface Availability (a ÷ b) X 100

- a = Functional Availability
- b = Scheduled Availability

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Availability of CLEC TAFI • Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPCM • ECTA	• Availability of BellSouth TAFI • Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPCM

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Regional Level	• ≥ 99.5%

OSS Interface Availability (M&R)

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

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Regional Level	• ≥ 99.5%

OSS Interface Availability (M&R)

OSS Interface	% Availability
CLEC TAFI	x
CLEC ECTA	x

OSS-4: Response Interval (Maintenance & Repair)

Definition

The response intervals are determined by subtracting the time a request is received on the BellSouth side of the interface from the time the response is received from the legacy system. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.

Exclusions

None

Business Rules

This measure is designed to monitor the time required for the CLEC and BellSouth interface system to obtain from BellSouth's legacy systems the information required to handle maintenance and repair functions. The clock starts on the date and time when the request is received on the BellSouth side of the interface and the clock stops when the response has been transmitted through that same point to the requester.

Note: The OSS Response Interval BellSouth Total Report is a combination of BellSouth Residence and Business Total.

Calculation

OSS Response Interval = (a - b)

- a = Query Response Date and Time
- b = Query Request Date and Time

Percent Response Interval (per category) = (c ÷ d) X 100

- c = Number of Response Intervals in category "X"
- d = Number of Queries Submitted in the Reporting Period

where, "X" is ≤ 4, $> 4 \leq 10$, ≤ 10, > 10, or > 30 seconds.

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• CLEC Transaction Intervals	• BellSouth Business and Residential Transactions Intervals

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• Regional Level	• Parity

Legacy System Access Times for M&R

System	BellSouth & CLEC	Count				
		≤ 4	> 4 ≤ 10	≤ 10	> 10	> 30
CRIS	x	x	x	x	x	x
DLETH	x	x	x	x	x	x
DLR	x	x	x	x	x	x
LMOS	x	x	x	x	x	x
LMOSupd	x	x	x	x	x	x
LNP	x	x	x	x	x	x
MARCH	x	x	x	x	x	x
OSPCM	x	x	x	x	x	x
Predictor	x	x	x	x	x	x
SOCS	x	x	x	x	x	x
NIW	x	x	x	x	x	x

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	Not Applicable

PO-1: Loop Makeup - Response Time – Manual

Definition

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

Exclusions

- Inquiries, which are submitted electronically.
- Designated Holidays are excluded from the interval calculation.
- Weekend hours from 5:00PM Friday until 8:00AM Monday are excluded from the interval calculation.
- Canceled Inquiries.

Business Rules

The CLEC Manual Loop Makeup Service Inquiry (LMUSI) process includes inquiries submitted via mail or FAX to BellSouth's Complex Resale Support Group (CRSG).

This measurement combines three intervals:

1. From receipt of the Service Inquiry for Loop Makeup to hand off to the Service Advocacy Center (SAC) for "Look-up."
2. From SAC start date to SAC complete date.
3. From SAC complete date to date the Complex Resale Support Group (CRSG) distributes loop makeup information back to the CLEC.

The "Receive Date" is defined as the date the Manual LMUSI is received by the CRSG. It is counted as day Zero. LMU "Return Date" is defined as the date the LMU information is sent back to the CLEC from BellSouth. The interval calculation is reset to Zero when a CLEC initiated change occurs on the Manual LMU request.

Note: The Loop Make Up 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 the loop makeup will support the service, a firm order LSR is submitted by the CLEC.

Calculation

Response Interval = (a - b)

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

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) X 100

- e = Total LMUSIs received within the interval
- f = Total Number of LMUSIs processed within the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
  - Region
- Interval for manual LMUs:
  0 – 1 day
  >1 – 2 days
  >2 – 3 days
  0 - ≤ 3 days
  >3 – 6 days

>6 – 10 days
> 10 days
• Average Interval in days

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Total Number of Inquiries • SI Intervals • State and Region	

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Loops	Benchmark • 95% in 3 Business Days

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Loops	Benchmark • 95% in 3 Business Days

PO-2: Loop Make Up - Response Time - Electronic

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.

Exclusions

- Manually submitted inquiries.
- Designated Holidays are excluded from the interval calculation.
- Canceled Requests.

Business Rules

The response interval starts when the CLEC's Mechanized Loop Makeup Service Inquiry (LMUSI) is submitted electronically through the Operational Support Systems interface, LENS, TAG or RoboTAG. It ends when BellSouth's Loop Facility Assignment and Control System (LFACS) responds electronically to the CLEC with the requested Loop Makeup data via LENS, TAG or RoboTAG Interfaces.

Note: The Loop Make Up 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 the loop makeup will support the service, a firm order LSR is submitted by the CLEC. EDI is not a pre-ordering system, and, therefore, is not applicable in this measure.

Calculation

Response Interval = (a - b)

- a = Date and Time 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) X 100

- e = Total LMUSIs received within the interval
- f = Total Number of LMUSIs processed within the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
  - Region
- Interval for electronic LMUs:
  0 – 1 minute
  >1 – 5 minutes
  0 - ≤ 5 minutes
  > 5 – 8 minutes
  > 8 – 15 minutes
  > 15 minutes
- Average Interval in minutes

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Legacy Contract • Response Interval • Regional Scope	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• Loop	Benchmark • 90% in 5 Minutes (Reassess after 6 months - new system)

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Loop	• 90% in 5 Minutes (Reassess after 6 months - new system)

Section 2: Ordering

O-1: Acknowledgement Message Timeliness

Definition

This measurement provides the response interval from the time an LSR is electronically submitted via EDI or TAG until an acknowledgement notice is sent by the system.

Exclusions

None

Business Rules

The process includes EDI & TAG system functional acknowledgements for all Local Service Requests (LSRs) which are electronically submitted by the CLEC. The start time is the receipt time of the LSR at BellSouth's side of the interface (gateway). The end time is when the acknowledgement is transmitted by BellSouth at BellSouth's side of the interface (gateway). If more than one CLEC uses the same ordering center, an Acknowledgement Message will be returned to the "Aggregator", however, BellSouth will not be able to determine which specific CLEC this message represented.

Calculation

Response Interval = (a - b)

- a = Date and Time Acknowledgement Notices returned to CLEC
- b = Date and Time LSRs electronically submitted by the CLEC via EDI or TAG respectively

Average Response Interval = (c ÷ d)

- c = Sum of all Response Intervals
- d = Total number of electronically submitted LSRs received, from CLECs via EDI or TAG respectively, in the Reporting Period.

Reporting Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
  - Region
- Electronically Submitted LSRs
  0 – ≤10 minutes
  > 10 – ≤20 minutes
  > 20 – ≤30 minutes
  0 – ≤ 30 minutes
  > 30 – ≤45 minutes
  > 45 – ≤60 minutes
  > 60 – ≤120 minutes
  > 120 minutes
- Average interval for electronically submitted LSRs in minutes

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report month • Record of functional acknowledgements	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• EDI	• EDI – 90% within 30 minutes (6 months – 95% within 30 minutes)
• TAG	• TAG – 95% within 30 minutes

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• EDI	• EDI – 90% within 30 minutes (6 months – 95% within 30 minutes)
• TAG	• TAG – 95% within 30 minutes

O-2: Acknowledgement Message Completeness

Definition

This measurement provides the percent of LSRs received via EDI or TAG, which are acknowledged electronically.

Exclusions

Manually submitted LSRs

Business Rules

EDI and TAG send Functional Acknowledgements for all LSRs, which are electronically submitted by a CLEC. 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.

Calculation

Acknowledgement Completeness = (a ÷ b) X 100

- a = Total number of Functional Acknowledgements returned in the reporting period for LSRs electronically submitted by EDI or TAG respectively
- b = Total number of electronically submitted LSRs received in the reporting period by EDI or TAG respectively

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
  - Region

Note: Acknowledgement message is generated before the system recognizes whether this message (LSR) will be partially or fully mechanized.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report month • Record of functional acknowledgements	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• EDI • TAG	• Benchmark: 100%

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• EDI • TAG	• Benchmark: 100%

O-3: Percent Flow-Through Service Requests (Summary)

Definition

The percentage of Local Service Requests (LSR) and LNP 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.

Exclusions

- Fatal Rejects
- Auto Clarification
- Manual Fallout
- CLEC System Fallout

Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (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, Manual Fallout.)

Definitions:

Fatal Rejects: Errors that prevent an LSR, submitted electronically by the CLEC, from being processed further. When an LSR is submitted by a CLEC, LEO/LNP Gateway will perform edit checks to ensure the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, LEO/LNP Gateway will reject the LSR and the CLEC will receive a Fatal Reject.

Auto-Clarification: Clarifications that occur due to invalid data within the LSR. LESOG/LAUTO will perform data validity checks to ensure the data within the LSR is correct and 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 NXXX requested, the CLEC will receive an Auto-Clarification.

Manual Fallout: Planned Fallout that occur 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, LESOG/LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. Following are the categories for Manual Fallout:

1. Complex*
2. Special pricing plans
3. Some Partial migrations
4. New telephone number not yet posted to BOCRIS
5. Pending order review required
6. CSR inaccuracies such as invalid or missing CSR data in CRIS
7. Expedites (requested by the CLEC)
8. Denials-restore and conversion, or disconnect and conversion orders
9. Class of service invalid in certain states with some types of service
10. Low volume such as activity type "T" (move)
11. More than 25 business lines, or more than 15 loops
12. Transfer of calls option for the CLEC end users
13. Directory Listings (Indentions and Captions)

* for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through.

Total System Fallout: Errors that require manual review by the LSCS 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 BellSouth caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

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

Calculation

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

- a = The total number of LSRs that flow through 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 fall out for manual processing
- d = the number of LSRs that are returned to the CLEC for clarification
- e = the number of LSRs that contain errors made by CLECs
- f = the number of LSRs that receive a Z status.

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

- a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued.
- b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
- c = the number of LSRs that are returned to the CLEC for clarification
- d = the number of LSRs that contain errors made by CLECs
- e = the number of LSRs that receive Z status

Report Structure

- CLEC Aggregate
  - Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance:
• Report month • Total number of LSRs received, by interface, by CLEC - TAG - EDI - LENS • Total number of errors by type, by CLEC - Fatal rejects - Auto clarification - CLEC caused system fallout • Total number of errors by error code • Total fallout for manual processing	• Report month • Total number of errors by type - BellSouth system error

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark[a]
• Residence	• Benchmark: 95%
• Business	• Benchmark: 90%
• UNE	• Benchmark: 85%
• LNP	• Benchmark: 85%

a. Benchmarks do not apply to the "Percent Achieved Flow Through."

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark[a]
• Residence	• Benchmark: 95%
• Business	• Benchmark: 90%
• UNE	• Benchmark: 85%
• LNP	• Benchmark: 85%

a. Benchmarks do not apply to the "Percent Achieved Flow Through."

O-4: Percent Flow-Through Service Requests (Detail)

Definition

A detailed list, by CLEC, of the percentage of Local Service Requests (LSR) and LNP 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 or human intervention.

Exclusions

- Fatal Rejects
- Auto Clarification
- Manual Fallout
- CLEC System Fallout

Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (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 three types of service: Resale, and Unbundled Network Elements (UNE) and specials. 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, Manual Fallout.)

Definitions:

Fatal Rejects: Errors that prevent an LSR, submitted electronically by the CLEC, from being processed further. When an LSR is submitted by a CLEC, LEO/LNP Gateway will perform edit checks to ensure the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, LEO/LNP Gateway will reject the LSR and the CLEC will receive a Fatal Reject.

Auto-Clarification: Clarifications that occur due to invalid data within the LSR. LESOG/LAUTO will perform data validity checks to ensure the data within the LSR is correct and 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 NXXX requested, the CLEC will receive an Auto-Clarification.

Manual Fallout: Planned Fallout that occur 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, LESOG/LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. Following are the categories for Manual Fallout:

1. Complex*
2. Special pricing plans
3. Some Partial migrations
4. New telephone number not yet posted to BOCRIS
5. Pending order review required
6. CSR inaccuracies such as invalid or missing CSR data in CRIS
7. Expedites (requested by the CLEC)
8. Denials-restore and conversion, or disconnect and conversion orders
9. Class of service invalid in certain states with some types of service
10. Low volume such as activity type "T" (move)
11. More than 25 business lines, or more than 15 loops
12. Transfer of calls option for the CLEC end users
13. Directory Listings (Indentions and Captions)

* for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through.

Total System Fallout: Errors that require manual review by the LSCS 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 BellSouth caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

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

Calculation

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

- a = The total number of LSRs that flow through 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 fall out for manual processing
- d = the number of LSRs that are returned to the CLEC for clarification
- e = the number of LSRs that contain errors made by CLECs
- f = the number of LSRs that receive a Z status.

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

- a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued.
- b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
- c = the number of LSRs that are returned to the CLEC for clarification
- d = the number of LSRs that contain errors made by CLECs
- e = the number of LSRs that receive Z status

Report Structure

Provides the flow through percentage for each CLEC (by alias designation) submitting LSRs through the CLEC mechanized ordering process. The report provides the following:

- CLEC (by alias designation)
- Number of fatal rejects
- Mechanized interface used
- Total mechanized LSRs
- Total manual fallout
- Number of auto clarifications returned to CLEC
- Number of validated LSRs
- Number of BellSouth caused fallout
- Number of CLEC caused fallout
- Number of Service Orders Issued
- Base calculation
- CLEC error excluded calculation

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • Total number of LSRs received, by interface, by CLEC - TAG - EDI - LENS • Total number of errors by type, by CLEC - Fatal rejects - Auto clarification - CLEC errors • Total number of errors by error code • Total fallout for manual processing	• Report month • Total number of errors by type - BellSouth system error

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark[a]
• Residence	• Benchmark: 95%
• Business	• Benchmark: 90%
• UNE	• Benchmark: 85%

SQM Level of Disaggregation	Retail Analog/Benchmark[a]
• LNP	• Benchmark: 85%

a. Benchmarks do not apply to the "Percent Achieved Flow Through."

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-5: Flow-Through Error Analysis

Definition

An analysis of each error type (by error code) that was experienced by the LSRs that did not flow through or reached a status for a FOC to be issued.

Exclusions

Each Error Analysis is error code specific, therefore exclusions are not applicable.

Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued. The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example, fax and courier).

Calculation

Total for each error type.

Report Structure

Provides an analysis of each error type (by error code). The report is in descending order by count of each error code and provides the following:

- Error Type (by error code)
- Count of each error type
- Percent of each error type
- Cumulative percent
- Error Description
- CLEC Caused Count of each error code
- Percent of aggregate by CLEC caused count
- Percent of CLEC caused count
- BellSouth Caused Count of each error code
- Percent of aggregate by BellSouth caused count
- Percent of BellSouth by BellSouth caused count.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • Total number of LSRs received • Total number of errors by type (by error code) - CLEC caused error	• Report month • Total number of errors by type (by error code) - BellSouth system error

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• NA	• NA

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-6: CLEC LSR Information

Definition

A list with the flow through activity of LSRs by CC, PON and Ver, issued by each CLEC during the report period.

Exclusions

- Fatal Rejects
- LSRs submitted manually

Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued. The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example, fax and courier).

Calculation

NA

Report Structure

Provides a list with the flow through activity of LSRs by CC, PON and Ver, issued by each CLEC during the report period with an explanation of the of the columns and content. This report is available on a CLEC specific basis. The report provides the following for each LSR.

- CC
- PON
- Ver
- Timestamp
- Type
- Err #
- Note or Error Description

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report month • Record of LSRs received by CC, PON and Ver • Record of Timestamp, Type, Err # and Note or Error Description for each LSR by CC, PON and Ver	NA

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• NA	• NA

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Table 1: LSR Flow-Through Matrix

Product	F/T[3]	Complex Service[4]	Complex Order	Planned Fallout For Manual Handling[1]	Edi	Tag[2]	Lens	Comments
2 wire analog DID trunk port	No	UNE	Yes	NA	N	N	N	
2 wire analog port	Yes	UNE	No	No	Y	Y	N	
2 wire ISDN digital line side port	No	UNE	Yes	NA	N	N	N	
2 wire ISDN digital loop	Yes	UNE	Yes	No	Y	Y	N	
3 Way Calling	Yes	No	No	No	Y	Y	Y	
4 wire analog voice grade loop	Yes	UNE	Yes	No	Y	Y	N	
4 wire DS0 & PRI digital loop	No	UNE	Yes	NA	N	N	N	
4 wire DS1 & PRI digital loop	No	UNE	Yes	NA	N	N	N	
4 wire ISDN DS1 digital trunk ports	No	UNE	Yes	NA	N	N	N	
Accupulse	No	Yes	Yes	NA	N	N	N	
ADSL	Yes	UNE	No	No	Y	Y	N	
Area Plus	Yes	No	No	No	Y	Y	Y	
Basic Rate ISDN	No	Yes	Yes	Yes	Y	Y	N	
Call Block	Yes	No	No	No	Y	Y	Y	
Call Forwarding-Variable	Yes	No	No	No	Y	Y	Y	
Call Return	Yes	No	No	No	Y	Y	Y	
Call Selector	Yes	No	No	No	Y	Y	Y	
Call Tracing	Yes	No	No	No	Y	Y	Y	
Call Waiting	Yes	No	No	No	Y	Y	Y	
Call Waiting Deluxe	Yes	No	No	No	Y	Y	Y	
Caller ID	Yes	No	No	No	Y	Y	Y	
CENTREX	No	Yes	Yes	NA	N	N	N	

Table 1: LSR Flow-Through Matrix

Product	F/T[3]	Complex Service[4]	Complex Order	Planned Fallout For Manual Handling[1]	EDI	Tag[2]	Lens	Comments
DID WITH PBX ACT W	No	Yes	Yes	Yes	Y	N	Y	
DID ACT W	No	Yes	Yes	Yes	Y	N	Y	
Digital Data Transport	No	UNE	Yes	NA	N	N	N	
Directory Listing Indentions	No	No	No	Yes	Y	Y	Y	
Directory Listings Captions	No	No	Yes	Yes	Y	Y	Y	
Directory Listings (simple)	Yes	No	No	No	Y	Y	Y	
DS3	No	UNE	Yes	NA	N	N	N	
DS1 Loop	Yes	UNE	Yes	No	Y	Y	N	
DSO Loop	Yes	UNE	Yes	No	Y	Y	N	
Enhanced Caller ID	Yes	No	No	No	Y	Y	Y	
ESSX	No	Yes	Yes	NA	N	N	N	
Flat Rate/Business	Yes	No	No	No	Y	Y	Y	
Flat Rate/Residence	Yes	No	No	No	Y	Y	Y	
FLEXSERV	No	Yes	Yes	NA	N	N	N	
Frame Relay	No	Yes	Yes	NA	N	N	N	
FX	No	Yes	Yes	NA	N	N	N	
Ga. Community Calling	Yes	No	No	No	Y	Y	Y	
HDSL	Yes	UNE	No	No	Y	Y	N	
Hunting MLH	No	C/S	C/S	Yes	Y	Y	N	
Hunting Series Completion	No	C/S	C/S	No	Y	Y	Y	
INP to LNP Conversions	No	UNE	Yes	Yes	Y	Y	N	
LightGate	No	Yes	Yes	NA	N	N	N	

Table 1: LSR Flow-Through Matrix

Product	F/T[3]	Complex Service[4]	Complex Order	Planned Fallout For Manual Handling[1]	EDI	Tag[2]	Lens	Comments
Local Number Portability	Yes	UNE	Yes	No	Y	Y	N	
LNP with Complex Listing	No	UNE	Yes	Yes	Y	Y	N	
LNP with Partial Migration	No	UNE	Yes	Yes	Y	Y	N	
LNP with Complex Services	No	UNE	Yes	Yes	Y	Y	N	
Loop+INP	Yes	UNE	No	No	Y	Y	N	
Loop+LNP	Yes	UNE	No	No	Y	Y	N	
Measured Rate/Bus.	Yes	No	No	No	Y	Y	Y	
Measured Rate/Res.	Yes	No	No	No	Y	Y	Y	
Megalink	No	Yes	Yes	NA	N	N	N	
Megalink-TI	No	Yes	Yes	NA	N	N	N	
Memory Call	Yes	No	No	No	Y	Y	Y	
Memory Call Ans. Svc.	Yes	No	No	No	Y	Y	Y	
Multiserv	No	Yes	Yes	NA	N	N	N	
Native Mode LAN Interconnection (NMLI)	No	Yes	Yes	NA	N	N	N	
Off-Prem Stations	No	Yes	Yes	NA	N	N	N	
Optional Calling Plan	Yes	No	No	No	Y	Y	Y	
Package/Complete Choice and area plus	Yes	No	No	No	Y	Y	Y	
Pathlink Primary Rate ISDN	No	Yes	Yes	NA	N	N	N	
Pay Phone Provider	No	No	No	NA	N	N	N	
PBX Standalone ACT A,C, D	No	Yes	Yes	Yes	Y	Y	N	
PBX Trunks	No	Yes	Yes	Yes	Y	Y	N	

Table 1: LSR Flow-Through Matrix

Product	F/T[3]	Complex Service[4]	Complex Order	Planned Fallout For Manual Handling[1]	Edi	Tag[2]	Lens	Comments
Port/Loop Combo	Yes	UNE	No	No	Y	Y	Y	
Port/Loop PBX	No	No	No	Yes	Y	Y	N	
Preferred Call Forward	Yes	No	No	No	Y	Y	Y	
RCF Basic	Yes	No	No	No	Y	Y	Y	
Remote Access to CF	Yes	No	No	No	Y	Y	Y	
Repeat Dialing	Yes	No	No	No	Y	Y	Y	
Ringmaster	Yes	No	No	No	Y	Y	Y	
Smartpath	No	Yes	Yes	NA	N	N	N	
SmartRING	No	Yes	Yes	NA	N	N	N	
Speed Calling	Yes	No	No	No	Y	Y	Y	
Synchronet	No	Yes	Yes	Yes	Y	Y	N	
Tie Lines	No	Yes	Yes	NA	N	N	N	
Touchtone	Yes	No	No	No	Y	Y	Y	
Unbundled Loop-Analog 2W, SL1, SL2	Yes	UNE	No	No	Y	Y	Y	
WATS	No	Yes	Yes	NA	N	N	N	
xDSL Extended LOOP	No	UNE	Yes	NA	N	N	N	

Note[1]: Planned Fallout for Manual Handling denotes those services that are electronically submitted and are not intended to flow through due to the complexity of the service.

Note[2]: The TAG column includes those LSRs submitted via Robo TAG.

Note[3]: For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: Expedites from CLECs, special pricing plans, denials – restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS – e.g. government, or cannot be changed when changing main TN on C activity, low volume – e.g. activity type T=move, pending order review required, more than 25 business lines, CSR inaccuracies such as invalid or missing CSR data in CRIS, Directory listing indentions and captions, transfer of calls option for CLEC end user – new TN not yet posted to BOCRIS. Many are unique to the CLEC environment.

Note[4]: Services with C/S in the Complex Service and/or the Complex Order columns can be either complex or simple.

O-7: Percent Rejected Service Requests

Definition

Percent Rejected Service Request is the percent of total Local Service Requests (LSRs) received which are rejected due to error or omission. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete.

Exclusions

Service Requests canceled by the CLEC prior to being rejected/clarified.

Business Rules

Fully Mechanized: An LSR is considered "rejected" when it is submitted electronically but does not pass LEO edit checks in the ordering systems (EDI, LENS, TAG, LEO, LESOG) and is returned to the CLEC without manual intervention. There are two types of "Rejects" in the Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR but required fields are either not populated or incorrectly populated and the request is returned to the CLEC before it is considered a valid LSR.

An **Auto Clarification** occurs when a valid LSR is electronically submitted but rejected from LESOG because it does not pass further edit checks for order accuracy.

Partially Mechanized: A valid LSR, which is electronically submitted (via EDI, LENS, TAG) but cannot be processed electronically and "falls out" for manual handling. It is then put into "clarification" and sent back (rejected) to the CLEC.

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized LSRs electronically submitted by the CLEC.

Non-Mechanized: LSRs which are faxed or mailed to the LCSC for processing and "clarified" (rejected) back to the CLEC by the BellSouth service representative.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

Calculation

Percent Rejected Service Requests = (a ÷ b) X 100

- a = Total Number of Rejected Service Requests in the reporting period
- b = Total Number of Service Requests Received in the reporting period

Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State
  - Region
- Product Specific percent Rejected
- Total percent Rejected

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • Total number of LSRs • Total number of Rejects • State and Region • Total Number of ASRs (Trunks)	

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
Mechanized, Partially Mechanized and Non-Mechanized • Resale - Residence • Resale - Business • Resale – Design (Special) • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop + Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport • Local Interconnection Trunks	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-8: Reject Interval

Definition

Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete.

Exclusions

- Service Requests canceled by CLEC prior to being rejected/clarified.
- Designated Holidays are excluded from the interval calculation.
- LSRs which are identified and classified as "Projects"
- The following hours for Partially mechanized and Non-mechanized LSRs are excluded from the interval calculation:

  Residence Resale Group – Monday through Saturday 7:00PM until 7:00AM
  From 7:00 PM Saturday until 7:00 AM Monday

  Business Resale, Complex, UNE Groups – Monday through Friday 6:00PM until 8:00AM
  From 6:00 PM Friday until 8:00 AM Monday.

  The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

  The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

  In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

Business Rules

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in EDI, TAG or LENS). 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, LENS or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via LENS, EDI, or TAG.

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized LSRs which are electronically submitted by the CLEC.

Non-Mechanized: The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via LON.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

Calculation

Reject Interval = (a - b)

- a = Date and Time of Service Request Rejection
- b = Date and Time of Service Request Receipt

Average Reject Interval = (c ÷ d)

- c = Sum of all Reject Intervals
- d = Number of Service Requests Rejected in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- Geographic Scope

- State
- Region

- 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
- 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
- Trunks:
  ≤ 4 days
  > 4 - ≤ 8 days
  > 8 - ≤ 12 days
  > 12 - ≤ 14 days
  > 14 - ≤ 20 days
  > 20 days
- Average Interval for mechanized reports in hours, non-mechanized and Trunk reports in days.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
Report month • Reject Interval • Total Number of LSRs • Total number of Rejects • State and Region • Total Number of ASRs (Trunks)	

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Resale – Residence • Resale – Business • Resale – Design (Special) • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop + Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport	• Mechanized: - 97% within 1Hour • Partially Mechanized: - 85% within 18 Hours in 3 Months - 85% within 10 Hours in 6 Months • Non-Mechanized: - 85% within 24 Hours
• Local Interconnection Trunks	• Trunks: 85% within 4 Days

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Fully Mechanized -	• 97% ≤ 1 hour

O-9: Firm Order Confirmation Timeliness

Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of valid LSR to distribution of a Firm Order Confirmation.

Exclusions

- Service Requests canceled by CLEC prior to being rejected/clarified.
- Designated Holidays are excluded from the interval calculation.
- LSRs which are identified and classified as "Projects" (under development)
- The following hours for Partially mechanized and Non-mechanized LSRs are excluded from the interval calculation:

  Residence Resale Group – Monday through Saturday 7:00PM until 7:00AM
  From 7:00 PM Saturday until 7:00 AM Monday

  Business Resale, Complex, UNE Groups – Monday through Friday 6:00PM until 8:00AM
  From 6:00 PM Friday until 8:00 AM Monday.

  The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

  The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

  In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

Business Rules

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI, LENS or TAG.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS, or TAG) 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, LENS, or TAG.
- **Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized LSRs which are electronically submitted by the CLEC.
- **Non-Mechanized:** The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON.
- **Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Interconnection Purchasing Center (IPC). Trunk data is reported as a separate category.

Calculation

Firm Order Confirmation Time = (a - b)

- a = Date and Time of Firm Order Confirmation
- b = Date and Time of Service Request Receipt

Firm Order Confirmation Timeliness = (c ÷ d)

- c = Sum of all Firm Order Confirmation Times
- d = Number of Service Requests Confirmed in Reporting Period

Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
  - CLEC Specific
  - CLEC Aggregate
- Geographic Scope

- State
- Region

• Fully Mechanized:
0 - ≤ 15 minutes
> 15 - ≤ 30 minutes
> 30 - ≤ 45 minutes
> 45 - ≤ 60 minutes
> 60 - ≤ 90 minutes
> 90 - ≤ 120 minutes
> 120 - ≤ 180 minutes
0 - ≤ 3 hours
> 3 - ≤ 6 hours
> 6 - ≤ 12 hours
> 12 - ≤ 24 hours
> 24 - ≤ 48 hours
> 48 hours

• Partially Mechanized:
0 - ≤ 4 hours
> 4 - ≤ 8 hours
> 8 - ≤ 10 hours
0 - ≤ 10 hours
> 10 - ≤ 18 hours
0 - ≤ 18 hours
> 18 - ≤ 24 hours
> 24 - ≤ 48 hours
> 48 hours

• Non-mechanized:
0 - ≤ 4 hours
> 4 - ≤ 8 hours
> 8 - ≤ 12 hours
> 12 - ≤ 16 hours
> 16 - ≤ 20 hours
> 20 - ≤ 24 hours
> 24 - ≤ 36 hours
0 - ≤ 36 hours
> 36 - ≤ 48 hours
> 48 hours

• Trunks:
0 - ≤ 5 days
> 5 - ≤ 10 days
0 - ≤ 10 days
> 10 - ≤ 15 days
> 15 - ≤ 20 days
> 20 days

• Average Interval in Days

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • Interval for FOC • Total number of LSRs • State and Region • Total Number of ASRs (Trunks)	

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Resale – Residence • Resale – Business • Resale – Design (Special) • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop + Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport	• Mechanized: - 95% within 3 Hours • Partially Mechanized: - 85% within 18 Hours in 3 Months - 85% within 10 Hours in 6 Months • Non-Mechanized: 85% within 36 hours
• Local Interconnection Trunks	• Trunks: - 95% within 10 days

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Fully Mechanized	• 95% within 3 hours
• Partially Mechanized	• 85% within 18 Hours in 3 Months • 85% within 10 Hours in 6 Months
• Non-Mechanized	• 85% within 36 hours
• IC Trunks	• 95% within 10 days

O-10: Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual[1]

Definition

This report measures the interval and the percent within the interval from the submission of a Service Inquiry (SI) with Firm Order LSR to the distribution of a Firm Order Confirmation (FOC).

Exclusions

- Designated Holidays are excluded from the interval calculation.
- Weekend hours from 5:00PM Friday until 8:00AM Monday are excluded from the interval calculation of the Service Inquiry.
- Canceled Requests
- Electronically Submitted Requests

Business Rules

This measurement combines four intervals:

1. From receipt of Service Inquiry with LSR to hand off to the Service Advocacy Center (SAC) for Loop 'Look-up'.
2. From SAC start date to SAC complete date.
3. From SAC complete date to the Complex Resale Support Group (CRSG) complete date with hand off to LCSC.
4. From receipt of SI/LSR in the LCSC to Firm Order Confirmation.

Calculation

FOC Timeliness Interval = (a - b)

- a = Date and Time Firm Order Confirmation (FOC) for SI with LSR returned to CLEC
- b = Date and Time SI with LSR received

Average Interval = (c ÷ d)

- c = Sum of all FOC Timeliness Intervals
- d = Total number of SIs with LSRs received in the reporting period

Percent Within Interval = (e ÷ f) X 100

- e = Total number of Service Inquiries with LSRs received by the CRSG to distribution of FOC by the Local Carrier Service Center (LCSC)
- f = Total number of Service Inquiries with LSRs received in the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
  - Region
- Intervals
  0 – ≤ 3 days
  > 3 – ≤ 5 days
  0 – ≤ 5 days
  > 5 – ≤ 7 days
  > 7 – ≤ 10 days
  > 10 – ≤ 15 days
  >15 days
- Average Interval measured in days

1. See O-9 for FOC Timeliness

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Total Number of Requests • SI Intervals • State and Region	

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• xDSL (includes UNE unbundled ADSL, HDSL and UNE Unbundled Copper Loops) • Unbundled Interoffice Transport	• 95% Returned within 5 Business days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-11: Firm Order Confirmation and Reject Response Completeness

Definition

A response is expected from BellSouth for every Local Service Request transaction (version). More than one response or differing responses per transaction is not expected. 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.

Exclusions

- Service Requests canceled by the CLEC prior to FOC or Rejected/Clarified.
- Non-Mechanized LSRs

Business Rules

Mechanized – The number of FOCs or Auto Clarifications sent to the CLEC from LENS, EDI, TAG in response to electronically submitted LSRs (date and time stamp in LENS, EDI, TAG).

Partially Mechanized – The number of FOCs or Rejects sent to the CLEC from LENS, EDI, TAG in response to electronically submitted LSRs (date and time stamp in LENS, EDI, TAG), which fall out for manual handling by the LCSC personnel.

Total Mechanized – The number of the combination of Fully Mechanized and Partially Mechanized LSRs

Note: Manual (Non-Mechanized) LSRs have no version control by the very nature of the manual process, therefore, non-mechanized LSRs are not captured by this report.

For CLEC Results:

Firm Order Confirmation and Reject Response Completeness is determined in two dimensions:

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.

Percent of multiple responses is determined by computing the number of Local Service Request unique versions receiving more than one Firm Order Confirmation, Reject or the combination of the two and dividing by the number of Local Service Requests (all versions) received in the reporting period.

Calculation

Single FOC/Reject Response Expected

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

- a = Total Number of Service Requests for which a Firm Order Confirmation or Reject is Sent
- b = Total Number of Service Requests Received in the Report Period

Multiple or Differing FOC / Reject Responses Not Expected

Response Completeness = [(a + b) ÷ c] X 100

- a = Total Number of Firm Order Confirmations Per LSR Version
- b = Total Number of Reject Responses Per LSR Version
- c = Total Number of Service Requests (All Versions) Received in the Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized

- State and Region
- CLEC Specific
- CLEC Aggregate
- BellSouth Specific

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
Report month • Reject interval • Total number of LSRs • Total number of rejects • Total number of ASRs (Trunks)	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• Resale Residence • Resale Business • Resale Design • Resale PBX • Resale Centrex • Resale ISDN • LNP Standalone • 2W Analog Loop Design • 2W Analog Loop Non – Design • UNE Digital Loop < DS1 • UNE Digital Loop ≥ DS1 • UNE Loop and Port Combinations • Switch Ports • UNE xDSL (ADSL, HDSL, UCL) • Line Sharing • Local Interoffice Transport • Local Interconnection Trunks	• 95% Returned

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Fully Mechanized	• 95% Returned

O-12: Speed of Answer in Ordering Center

Definition

Measures the average time a customer is in queue.

Exclusions

None

Business Rules

The clock starts when the appropriate option is selected (i.e., 1 for Resale Consumer, 2 for Resale Multiline, and 3 for UNE-LNP, etc.) and the call enters the queue for that particular group in the LCSC. The clock stops when a BellSouth service representative in the LCSC answers the call. The speed of answer is determined by measuring and accumulating the elapsed time from the entry of a CLEC call into the BellSouth automatic call distributor (ACD) until a service representative in BellSouth's Local Carrier Service Center (LCSC) answers the CLEC call.

Calculation

Speed of Answer in Ordering Center = (a ÷ b)

- a = Total seconds in queue
- b = Total number of calls answered in the Reporting Period

Report Structure

Aggregate

- CLEC – Local Carrier Service Center
- BellSouth
  - Business Service Center
  - Residence Service Center

Note: Combination of Residence Service Center and Business Service Center data under development

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Mechanized tracking through LCSC Automatic Call Distributor	• Mechanized tracking through BellSouth Retail center support system.

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
Aggregate • CLEC – Local Carrier Service Center • BellSouth - Business Service Center - Residence Service Center	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-13: LNP-Percent Rejected Service Requests

Definition

Percent Rejected Service Request is the percent of total Local Service Requests (LSRs) which are rejected due to error or omission. An LSR is considered valid when it is electronically submitted by the CLEC and passes LNP Gateway edit checks to insure the data received is correctly formatted and complete, i.e., fatal rejects are excluded.

Exclusions

- Service Requests canceled by the CLEC
- Fatal Rejects
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.

Business Rules

An LSR is considered "rejected" when it is submitted electronically but does not pass edit checks in the ordering systems (EDI, TAG, LNP Gateway, LAUTO) and is returned to the CLEC without manual intervention.

Fully Mechanized: There are two types of "Rejects" in the Fully Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR (via EDI or TAG) but required fields are not populated correctly and the request is returned to the CLEC.

Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs.

An **Auto Clarification** is a valid LSR which is electronically submitted (via EDI or TAG), but is rejected from LAUTO because it does not pass further edit checks for order accuracy. Auto Clarifications are returned without manual intervention.

Partially Mechanized: A valid LSR which is electronically submitted (via EDI or TAG), but cannot be processed electronically due to a CLEC error and "falls out" for manual handling. It is then put into "clarification", and sent back (rejected) to the CLEC.

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized rejects.

Non-Mechanized: A valid LSR which is faxed or mailed to the BellSouth LCSC.

Calculation

LNP-Percent Rejected Service Requests = (a ÷ b) X 100

- a = Number of Service Requests Rejected in the Reporting Period
- b = Number of Service Requests Received in the Reporting Period

Report Structure

- Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Not Applicable	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• LNP • UNE Loop w/LNP	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	Not Applicable

O-14: LNP-Reject Interval Distribution & Average Reject Interval

Definition

Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is electronically submitted by the CLEC and passes LNP Gateway edit checks to insure the data received is correctly formatted and complete, i.e., fatal rejects are excluded.

Exclusions

- Service Requests canceled by the CLEC
- Fatal Rejects
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.

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 until that LSR is rejected back to the CLEC. Elapsed time for each LSR 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.

An LSR is considered "rejected" when it is submitted electronically but does not pass edit checks in the ordering systems (EDI, TAG, LNP Gateway, LAUTO) and is returned to the CLEC without manual intervention.

Fully Mechanized: There are two types of "Rejects" in the Fully Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR but required fields are not populated correctly and the request is returned to the CLEC.

Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs.

An **Auto Clarification** is a valid LSR which is electronically submitted (via EDI or TAG), but is rejected from LAUTO because it does not pass further edit checks for order accuracy. Auto Clarifications are returned without manual intervention.

Partially Mechanized: A valid LSR which electronically submitted (via EDI or TAG), but cannot be processed electronically due to a CLEC error and "falls out" for manual handling. It is then put into "clarification", and sent back to the CLEC.

Total Mechanized: Combination of Fully Mechanized and Partially Mechanized rejects.

Non-Mechanized: A valid LSR which is faxed or mailed to the BellSouth LCSC.

Calculation

Reject Interval = (a - b)

- a = Date & Time of Service Request Rejection
- b = Date & Time of Service Request Receipt

Average Reject Interval = (c ÷ d)

- c = Sum of all Reject Intervals
- d = Total Number of Service Requests Rejected in Reporting Period

Reject Interval Distribution = (e ÷ f) X 100

- e = Service Requests Rejected in reported interval
- f = Total Number of Service Requests Rejected in Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized

- CLEC Specific
- CLEC Aggregate
- State, Region

- 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
- 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
- Average Interval in Days

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
Under Development	

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• LNP • UNE Loop with LNP	• Mechanized: 97% within 1Hour • Partially Mechanized: 85% within 18 Hours • Non-Mechanized: 85% within 24 Hours

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

O-15: LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval

Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of a valid LSR to distribution of a firm order confirmation.

Exclusions

- Rejected LSRs (Clarifications or Fatal Rejects)
- Order Activities of BellSouth or the CLEC associated with interval or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable.

Business Rules

The Firm Order Confirmation interval is determined for each confirmed LSR processed during the reporting period. The Firm Order Confirmation interval is the elapsed time from when BellSouth receives an LSR until that LSR is confirmed back to the CLEC. Elapsed time for each LSR is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed to produce the Firm Order Confirmation timeliness interval distribution.

- **Mechanized:** The elapsed time from receipt of a valid LSR until the LSR is processed and appropriate service orders are generated in SOCS without manual intervention.
- **Partially Mechanized:** The elapsed time from receipt of an electronically submitted LSR which falls for manual handling by the LCSC personnel until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation system (SONGS).
- **Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized FOCs.
- **Non-Mechanized: (Under Development)** A valid LSR which is faxed or mailed to the BellSouth LCSC.

Calculation

Reject Interval = (a - b)

- a = Date & Time of Firm Order Confirmation
- b = Date & Time of Service Request Receipt)

Average Reject Interval = (c ÷ d)

- c = Sum of all Reject Intervals
- d = Total Number of Service Requests Confirmed in Reporting Period

FOC Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Service Requests Confirmed in interval
- f = Total Service Requests Confirmed in the Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized

- CLEC Specific
- CLEC Aggregate
- State and Region
- Fully Mechanized:
  0 - ≤15 minutes
  > 15 - ≤ 30 minutes
  > 30 - ≤ 45 minutes
  > 45 - ≤ 60 minutes
  > 60 - ≤ 90 minutes
  > 90 - ≤ 120 minutes
  > 120 - ≤ 180 minutes
  0 - ≤ 3 hours
  > 3 - ≤ 6 hours

> 6 - ≤ 12 hours
> 12 - ≤ 24 hours
> 24 - ≤ 48 hours
> 48 hours

- Partially Mechanized:
  0 - ≤ 4 hours
  > 4 - ≤ 8 hours
  > 8 - ≤ 10 hours
  0 - ≤ 18 hours
  > 10 - ≤ 18 hours
  > 18 - ≤ 24 hours
  > 24 - ≤ 48 hours
  > 48 hours
- Non-Mechanized:
  0 - ≤ 4 hours
  > 4 - ≤ 8 hours
  > 8 - ≤ 12 hours
  > 12 - ≤ 16 hours
  > 16 - ≤ 20 hours
  > 20 - ≤ 24 hours
  > 24 - ≤ 36 hours
  0 - ≤ 36 hours
  > 36 - ≤ 48 hours
  > 48 hours

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
Report Month • Total Number of LSRs • Total Number of FOCs • State and Region	Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• LNP • UNE Loop with LNP	• Mechanized: 95% within 3 Hours • Partially Mechanized: 85% within 18 hours (10 hrs. after 6 months) • Non-Mechanized: 85% within 36 hours

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
Not Applicable	Not Applicable

Section 3: Provisioning

P-1: Mean Held Order Interval & Distribution Intervals

Definition

When delays occur in completing CLEC orders, the average period that CLEC orders are held for BellSouth reasons, pending a delayed completion, should be no worse for the CLEC when compared to BellSouth delayed orders. Calculation of the interval is the total days orders are held and pending but not completed that have passed the currently committed due date; divided by the total number of held orders. This report is based on orders still pending, held and past their committed due date at the close of the reporting period. The distribution interval is based on the number of orders held and pending but not completed over 15 and 90 days. (Orders reported in the >90 day interval are also included in the >15 day interval.)

Exclusions

- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
- Disconnect (D) & From (F) orders
- Orders with appointment code of 'A' for Rural orders.

Business Rules

Mean Held Order Interval: This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as completed in SOCS and have passed the currently committed due date for the order. For each such order, the number of calendar days between the earliest committed due date on which BellSouth had a company missed appointment and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings, unless otherwise noted, and the reason for the order being held. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval. The interval is by calendar days with no exclusions for Holidays or Sundays.

CLEC Specific reporting is by type of held order (facilities, equipment, other), total number of orders held, and the total and average days.

Held Order Distribution Interval: This measure provides data to report total days held and identifies these in categories of >15 days and > 90 days. (Orders counted in >90 days are also included in > 15 days).

Calculation

Mean Held Order Interval = a ÷ b

- a = Sum of held-over-days for all Past Due Orders Held for the reporting period
- b = Number of Past Due Orders Held and Pending But Not Completed and past the committed due date

Held Order Distribution Interval (for each interval) = (c ÷ d) X 100

- c = # of Orders Held for ≥ 15 days or # of Orders Held for ≥ 90 days
- d = Total # of Past Due Orders Held and Pending But Not Completed)

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Circuit Breakout < 10, ≥ 10 (except trunks)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • CLEC Order Number and PON (PON) • Order Submission Date (TICKET_ID) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Hold Reason • Total line/circuit count • Geographic Scope	• Report month • BellSouth Order Number • Order Submission Date • Committed Due Date • Service Type • Hold Reason • Total line/circuit count • Geographic Scope
Note: Code in parentheses is the corresponding header found in the raw data file.	

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop-Non-Design	• Retail Residence and Business (POTS - Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN - BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices

Definition

When BellSouth can determine in advance that a committed due date is in jeopardy for facility delay, it will provide advance notice to the CLEC.

The interval is from the date/time the notice is released to the CLEC/BellSouth systems until 5pm on the commitment date of the order. The Percent of Orders is the percentage of orders given jeopardy notices for facility delay in the count of orders confirmed in the report period.

Exclusions

- Orders held for CLEC end user reasons
- Disconnect (D) & From (F) orders

Business Rules

When BellSouth can determine in advance that a committed due date is in jeopardy for facility delay, it will provide advance notice to the CLEC. The number of committed orders in a report period is the number of orders that have a due date in the reporting period. Jeopardy notices for interconnection trunks results are usually zero as these trunks seldom experience facility delays. The Committed due date is considered the Confirmed due date.

Calculation

Jeopardy Interval = a - b

- a = Date and Time of Jeopardy Notice
- b = Date and Time of Scheduled Due Date on Service Order

Average Jeopardy Interval = c ÷ d

- c = Sum of all jeopardy intervals
- d = Number of Orders Notified of Jeopardy in Reporting Period

Percent of Orders Given Jeopardy Notice = (e ÷ f) X 100

- e = Number of Orders Given Jeopardy Notices in Reporting Period
- f = Number of Orders Confirmed (due) in Reporting Period)

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Mechanized Orders
- Non-Mechanized Orders

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • CLEC Order Number and PON • Date and Time Jeopardy Notice sent • Committed Due Date • Service Type **Note:** Code in parentheses is the corresponding header found in the raw data file.	• Report month • BellSouth Order Number • Date and Time Jeopardy Notice sent • Committed Due Date • Service Type

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark:
% Orders Given Jeopardy Notice	
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail
• Average Jeopardy Notice Interval (Electronic Only)	• 95% ≥ 48 Hours

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-3: Percent Missed Installation Appointments

Definition

"Percent missed 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 measure is the percentage of total orders processed for which BellSouth is unable to complete the service orders on the committed due dates and reported for Total misses and End User Misses.

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.)
- Disconnect (D) & From (F) orders
- End User Misses on Interconnection Trunks

Business Rules

Percent Missed 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 included 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.

Calculation

Percent Missed Installation Appointments = (a ÷ b) X 100

- a = Number of Orders with Completion date in Reporting Period past the Original Committed Due Date
- b = Number of Orders Completed in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Report in Categories of <10 lines/circuits ≥ 10 lines/circuits (except trunks)
- Dispatch/No Dispatch

Report Explanation: The difference between End User MA and Total MA is the result of BellSouth caused misses. Here, Total MA is the total percent of orders missed either by BellSouth or CLEC end user. The End User MA represents the percentage of orders missed by the CLEC or their end user.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • CLEC Order Number and PON (PON) • Committed Due Date (DD) • Completion Date (CMPLTN DD) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope	• Report month • BellSouth Order Number • Committed Due Date (DD) • Completion Date (CMPLTN DD) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope
Note: Code in parentheses is the corresponding header found in the raw data file.	

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN - BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

P-4: Average Completion Interval (OCI) & Order Completion Interval Distribution

Definition

The "average completion interval" measure monitors the interval of time it takes BellSouth to provide service for the CLEC or its own customers. The "Order Completion Interval Distribution" provides the percentages of orders completed within certain time periods. This report measures how well BellSouth meets the interval offered to customers on service orders.

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.)
- Disconnect (D&F) orders (Except "D" orders associated with LNP Standalone)
- "L" Appointment coded orders (where the customer has requested a later than offered interval)
- End user-caused misses

Business Rules

The actual completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from when BellSouth issues a FOC or SOCS date time stamp receipt of an order from the CLEC to BellSouth's actual order completion date. The clock starts when a valid order number is assigned by SOCS and stops when the technician or system completes the order in SOCS. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are 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).

The interval breakout for UNE and Design is: 0-5 = 0-4.99, 5-10 = 5-9.99, 10-15 = 10-14.99, 15-20 = 15- 19.99, 20-25 = 20-24.99, 25-30 = 25-29.99, ≥ 30 = 30 and greater.

Calculation

Completion Interval = (a - b)

- a = Completion Date
- b = FOC/SOCS date time-stamp (application date)

Average Completion Interval = (c ÷ d)

- c = Sum of all Completion Intervals
- d = Count of Orders Completed in Reporting Period

Order Completion Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Service Orders Completed in "X" days
- f = Total Service Orders Completed in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Dispatch / No Dispatch categories applicable to all levels except trunks
- Residence & Business reported in day intervals = 0,1,3,4,5,5+
- UNE and Design reported in day intervals =0-5,5-10,10-15,15-20,20-25,25-30,≥ 30
- All Levels are reported <10 line/circuits; ≥ 10 line/circuits (except trunks)
- ISDN Orders included in Non-Design

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • CLEC Company Name • Order Number (PON) • Application Date & Time • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Geographic Scope **Note:** Code in parentheses is the corresponding header found in the raw data file.	• Report month • BellSouth Order Number • Order Submission Date & Time • Order Completion Date & Time • Service Type • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch + 2 days
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• 7 Days w/o conditioning
• UNE xDSL (HDSL, ADSL and UCL)	• 14 Days with conditioning
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• 7 Days w/o conditioning
• UNE xDSL	• 14 Days with conditioning
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

P-5: Average Completion Notice Interval

Definitions

The Completion Notice Interval is the elapsed time between the BellSouth reported completion of work and the issuance of a valid completion notice to the CLEC.

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.)
- D&F orders (Exception: "D" orders associated with LNP Standalone)

Business Rules

Measurement on interval of completion date and time entered by a field technician on dispatched orders, and 5PM start time on the due date for non-dispatched orders; to the release of a notice to the CLEC/BellSouth of the completion status. The field technician notifies the CLEC the work was complete and then he/she enters the completion time stamp information in his/her computer. This information switches through to the SOCS systems either completing the order or rejecting the order to the Work Management Center (WMC). If the completion is rejected, it is manually corrected and then completed by the WMC. The notice is returned on each individual order.

The start time for all orders is the completion stamp either by the field technician or the 5PM due date stamp; the end time for mechanized orders is the time stamp the notice was transmitted to the CLEC interface (LENS, EDI, OR TAG). For non-mechanized orders the end timestamp will be timestamp of order update to C-SOTS system.

Calculation

Completion Notice Interval = (a - b)

- a = Date and Time of Notice of Completion
- b = Date and Time of Work Completion

Average Completion Notice Interval = c ÷ d

- c = Sum of all Completion Notice Intervals
- d = Number of Orders with Notice of Completion in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Mechanized Orders
- Non-Mechanized Orders
- Reporting intervals in Hours; 0,1-2,2-4,4-8,8-12,12-24, ≥ 24 plus Overall Average Hour Interval (The categories are inclusive of these time intervals: 0-1 = 0.99; 1-2 =1-1.99; 2-4 = 2-3.99, etc.)
- Reported in categories of <10 line / circuits; ≥ 10 line/circuits (except trunks)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • CLEC Order Number (so_nbr) • Work Completion Date (cmpltn_dt) • Work Completion Time • Completion Notice Availability Date • Completion Notice Availability Time • Service Type • Geographic Scope	• Report month • BellSouth Order Number (so_nbr) • Work Completion Date (cmpltn_dt) • Work Completion Time • Completion Notice Availability Date • Completion Notice Availability Time • Service Type • Geographic Scope
Note: Code in parentheses is the corresponding header found in the raw data file.	**NOTE:** Code in parentheses is the corresponding header found in the raw data file.

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• LNP (Standalone)	• Retail Residence and Business (POTS)
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non-Design	• Retail Residence and Business (POTS Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Combo Other	• Retail Residence and Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-6: Coordinated Customer Conversions Interval

Definition

This report measures the average time it takes BellSouth to disconnect an unbundled loop from the BellSouth switch and cross connect it to a CLEC equipment. This measurement applies to service orders with and without LNP, and where the CLEC has requested BellSouth to provide a coordinated cut over.

Exclusions

- Any order canceled by the CLEC will be excluded from this measurement.
- Delays 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.

Business Rules

Where 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. 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.

Calculation

Coordinated Customer Conversions Interval = (a - b)

- a = Completion Date and Time for Cross Connection of a Coordinated Unbundled Loop
- b = Disconnection Date and Time of an Coordinated Unbundled Loop

Percent Coordinated Customer Conversions (for each interval) = (c ÷ d) X 100

- c = Total number of Coordinated Customer Conversions for each interval
- d = Total Number of Unbundled Loop with Coordinated Conversions (items) for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- The interval breakout is 0<5 = 0-4.99, 5<15 = 5-14.99, ≥15 = 15 and greater, plus Overall Average Interval.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • CLEC Order Number • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Cut over Start Time • Cut over Completion time • Portability start and completion times (INP orders) • Total Conversions (Items) **Note:** Code in parentheses is the corresponding header found in the raw data file.	• No BellSouth Analog Exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Unbundled Loops with INP • Unbundled Loops with LNP	• 95% ≤ 15 minutes

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Unbundled Loops	• 95% ≤ 15 minutes

P-6A: Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval

Definition

This category measures whether BellSouth begins the cut over of an unbundled loop on a coordinated and/or a time specific order at 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.

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.
- All unbundled loops on multiple loop orders after the first loop.

Business Rules

This report measures whether BellSouth begins the cut over of an unbundled loop on a coordinated and/or a time specific order at the CLEC requested start time. The cut is considered on time if it starts 15 minutes before or after the requested start time. Using the scheduled time and the actual cut over start time, the measurement will calculate the percent within interval and the average interval. If a cut involves multiple lines, the cut will be considered "on time" if the first line is cut within the 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 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 notifies the CLEC by 10:30 A.M. on the day before the due date that the service is on IDLC.

A Hot Cut is considered complete when one of the following occurs:

1. BellSouth performs the hot cut, notifies the CLEC by telephone.
2. BellSouth performs the hot cut and attempts to notify the CLEC by telephone, but receives no answer and leaves a phone message.

Calculation

% within Interval = (a ÷ b) X 100

- a = Total Number of Coordinated Unbundled Loop Orders for the interval
- b = Total Number of Coordinated Unbundled Loop Orders for the reporting period

Interval = (c - d)

- c = Scheduled Time for Cross Connection of a Coordinated Unbundled Loop Order
- d = Actual Start Date and Time of a Coordinated Unbundled Loop Order

Average Interval = (e ÷ f)

- Sum of all Intervals
- Total Number of Coordinated Unbundled Loop Orders for the reporting period.

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

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • CLEC Order Number (so_nbr) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Cut over Scheduled Start Time • Cut over Actual Start Time • Total Conversions Orders **Note:** Code in parentheses is the corresponding header found in the raw data file.	• No BellSouth Analog exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• Product Reporting Level - SL1 Time Specific - SL1 Non-Time Specific - SL2 Time Specific - SL2 Non-Time Specific	• 95% Within + or – 15 minutes of Scheduled Start Time
- SL1 IDLC - SL2 IDLC	• 95% within 4-hour window

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- UNE Loops	• 95% Within + or – 15 minutes of Scheduled Start time
- SL1 IDLC	• 95% within 4-hour window

P-6B: Coordinated Customer Conversions – Average Recovery Time

Definition

Measures the time between notification and resolution by BellSouth of a service outage found that can be isolated to the BellSouth side of the network. The time between notification and resolution by BellSouth must be measured to ensure that CLEC customers do not experience unjustifiable lengthy service outages during a Coordinated Customer Conversion. This report measures outages associated with Coordinated Customer Conversions prior to service order completion.

Exclusions

- Cut overs where service outages are due to CLEC caused reasons
- Cut overs where service outages are due to end-user caused reasons

Business Rules

Measures the outage duration time related to Coordinated Customer Conversions from the initial trouble notification until the 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.

Calculation

Recovery Time = (a - b)

- a = Date & Time That Trouble is Closed by CLEC
- b = Date & Time Initial Trouble is Opened with BellSouth

Average Recovery Time = (c ÷ d)

- c = Sum of all the Recovery Times
- d = Number of Troubles Referred to the BellSouth

Report Structure

- CLEC Specific
- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report month • CLEC Company Name • CLEC Order Number (so_nbr) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • CLEC Acceptance Conflict (CLEC_CONFLICT) under development • CLEC Conflict Resolved (CLEC_RESOVE) under development • CLEC Conflict MFC (CLEC_CONFLICT_MFC) under development • Total Conversion Orders **Note:** Code in parentheses is the corresponding header found in the raw data file.	• None

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• Unbundled Loops with INP • Unbundled Loops with LNP	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-6C: Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order

Definition

The Percent Provisioning Troubles received within 7 days of a completed service order associated with a Coordinated Customer Conversion (CCC) measures the quality and accuracy of Coordinated Customer Conversion Activities.

Exclusions

- Any order canceled by the CLEC
- Troubles caused by Customer Provided Equipment

Business Rules

Measures the quality and accuracy of completed service orders associated with Coordinated Customer Conversions. The first trouble report received on a circuit ID within 7 days following a service order completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate. Reports are calculated searching in the prior report period for completed Coordinated Customer Conversion service orders and following 7 days after the completion of the service order for a trouble report issue date.

Calculation

% Provisioning Troubles within 7 days of service order completion = (a ÷ b) X 100

- a = The sum of all CCC Circuits with a trouble within 7 days following service order(s) completion
- b = The total number of CCC service order circuits completed in the previous report calendar month

Report Structure

- CLEC Specific
- CLEC Aggregate
- Dispatch/Non-Dispatch

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • CLEC Order Number (so_nbr) • PON • Order Submission Date (TICKET_ID) • Order Submission Time (TICKET_ID) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope • Total conversion circuits **Note:** Code in parentheses is the corresponding header found in the raw data file.	• No BellSouth Analog exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• UNE Loop Design • UNE Loop Non-Design • Dispatch/Non-Dispatch	• ≤ 5%

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• UNE Loops	• ≤ 5%

P-7: Cooperative Acceptance Testing - % of xDSL Loops Tested

Definition

The loop will be considered cooperatively tested when the BellSouth technician places a call to the CLEC representative to initiate cooperative testing and jointly performs the tests with the CLEC.

Exclusions

- Testing failures due to CLEC (incorrect contact number, CLEC not ready, etc.)
- xDSL lines with no request for cooperative testing

Business Rules

When a BellSouth technician finishes delivering an order for an xDSL loop where the CLEC order calls for cooperative testing at the customer's premise, the BellSouth technician is to call a toll free number to the CLEC testing center. The BellSouth technician and the CLEC representative at the center then test the line. As an example of the type of testing performed, the testing center may ask the technician to put a short on the line so that the center can run a test to see if it can identify the short.

Calculation

Cooperative Acceptance Testing - % of xDSL Loops Tested = (a ÷ b) X 100

- a = Total number of successful xDSL cooperative tests for xDSL lines where cooperative testing was requested in the reporting period
- b = Total Number of xDSL line tests requested by the CLEC and scheduled in the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Type of Loop tested

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • CLEC Company Name (OCN) • CLEC Order Number (so_nbr) and PON (PON) • Committed Due Date (DD) • Service Type (CLASS_SVC_DESC) • Acceptance Testing Completed (ACCEPT_TESTING) under development • Acceptance Testing Declined (ACCEPT_TESTING) under development • Total xDSL Orders **Note**: Code in parentheses is the corresponding header found in the raw data file.	• No BellSouth analog exists

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation:	Retail Analog/Benchmark:
• UNE xDSL - ADSL - HDSL - UCL - OTHER	• 95% of Lines Tested

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation:	SEEM Analog/Benchmark:
• UNE xDSL	• 95% of Lines Tested

P-8: % Provisioning Troubles within 30 days of Service Order Completion

Definition

Percent Provisioning Troubles within 30 days of Service Order Completion measures the quality and accuracy of Service order activities.

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.)
- D & F orders
- Trouble reports caused and closed out to Customer Provided Equipment (CPE)

Business Rules

Measures the quality and accuracy of completed orders. The first trouble report from a service order after 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 service orders and following 30 days after completion of the service order for a trouble report issue date.

D & F orders are excluded as there is no subsequent activity following a disconnect.

Note: Standalone LNP historical data is not available in the maintenance systems (LMOS or WFA).

Calculation

% Provisioning Troubles within 30 days of Service Order Activity = (a ÷ b) X 100

- a = Trouble reports on all completed orders 30 days following service order(s) completion
- b = All Service Orders completed in the previous report calendar month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Reported in categories of <10 line/circuits; ≥ 10 line/circuits (except trunks)
- Dispatch / No Dispatch (except trunks)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • CLEC Order Number and PON • Order Submission Date (TICKET_ID) • Order Submission Time (TICKET_ID) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope **Note:** Code in parentheses is the corresponding header found in the raw data file.	• Report Month • BellSouth Order Number • Order Submission Date • Order Submission Time • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• Resale Residence	• Retail Residence

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence and Business Dispatch
• 2W Analog Loop Non -Design	• Retail Residence and Business (POTS - Excluding Switch-Based Orders)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN (Includes UDC)	• Retail ISDN BRI
• UNE Line Sharing	• ADSL provided to Retail
• UNE Switch ports	• Retail Residence and Business (POTS)
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Combo Other	• Retail Residence, Business and Design Dispatch
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice
• Local Interconnection Trunks	• Parity with Retail

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

P-9: Total Service Order Cycle Time (TSOCT)

Definition

This report measures the total service order cycle time from receipt of a valid service order request to the return of a completion notice to the CLEC Interface.

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.)
- D (Disconnect - Except "D" orders associated with LNP Standalone.) and F (From) orders. (From is disconnect side of a move order when the customer moves to a new address).
- "L" Appointment coded orders (where the customer has requested a later than offered interval)
- Orders with CLEC/Subscriber caused delays or CLEC/Subscriber requested due date changes.

Business Rules

The interval is determined for each order processed during the reporting period. This measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval.

This interval starts with the receipt of a valid service order request and stops when a completion notice is sent to the CLEC Interface (LENS, TAG OR EDI). Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are 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 same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

Reporting is by Fully Mechanized, Partially Mechanized and Non-Mechanized receipt of LSRs.

Calculation

Total Service Order Cycle Time = (a - b)

- a = Service Order Completion Notice Date
- b = Service Request Receipt Date

Average Total Service Order Cycle Time = (c ÷ d)

- c = Sum of all Total Service Order Cycle Times
- d = Total Number Service Orders Completed in Reporting Period

Total Service Order Cycle Time Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Total Number of Service Requests Completed in "X" minutes/hours
- f = Total Number of Service Requests Received in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Fully Mechanized; Partially Mechanized; Non-Mechanized
- Report in categories of <10 line/circuits; ≥ 10 line/circuits (except trunks)
- Dispatch / No Dispatch categories applicable to all levels except trunks
- Intervals 0-5, 5-10, 10-15, 15-20, 20-25, 25-30, ≥ 30 Days. The interval breakout is: 0-5 = 0-4.99, 5-10 = 5-9.99, 10-15 = 10-14.99, 15-20 = 15-19.99, 20-25 = 20-24.99, 25-30 = 25-29.99, ≥ 30 = 30 and greater.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Interval for FOC • CLEC Company Name (OCN) • Order Number (PON) • Submission Date & Time (TICKET_ID) • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Geographic Scope **Note:** Code in parentheses is the corresponding header found in the raw data file	• Report Month • BellSouth Order Number • Order Submission Date & Time • Order Completion Date & Time • Service Type • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark
• Resale Residence • Resale Business • Resale Design • Resale PBX • Resale Centrex • Resale ISDN • LNP (Standalone) • 2W Analog Loop Design • 2W Analog Loop Non-Design • UNE Switch ports • UNE Digital Loops < DS1 • UNE Digital Loops ≥ DS1 • UNE Loop + Port Combinations • UNE Combo Other • UNE xDSL (HDSL, ADSL and UCL) • UNE ISDN • UNE Line Sharing • Local Transport (Unbundled Interoffice Trans port) • Local Interconnection Trunks	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

P-10: LNP-Percent Missed Installation Appointments

Definition

"Percent missed installation appointments" monitors the reliability of BellSouth commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customer as compared to BellSouth. This measure is the percentage of total orders processed for which BellSouth is unable to complete the service orders on the committed due dates and reported for total misses and End User Misses.

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

Business Rules

Percent Missed Installation Appointments (PMI) is the percentage of total orders processed for which BellSouth is unable to complete the service orders on the committed due dates. Missed Appointments caused by end-user reasons will be included and reported in a separate category. 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.

Calculation

LNP Percent Missed Installation Appointments = (a ÷ b) X 100

- a = Number of Orders with Completion date in Reporting Period past the Original Committed Due Date
- b = Number of Orders Completed in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State/Region
- Report in Categories of <10 lines/circuits ≥ 10 lines/circuits (except trunks)
- Dispatch/No Dispatch

Report explanation: Total Missed Appointments is the total percent of orders missed either by BellSouth or the CLEC end user. End User MA represents the percentage of orders missed by the CLEC end user. The difference between End User Missed Appointments and Total Missed Appointments is the result of BellSouth caused misses.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report month • CLEC Order Number and PON (PON) • Committed Due Date (DD) • Completion Date (CMPLTN DD) • Status Type • Status Notice Date • Standard Order Activity • Geographic Scope **Note:** Code in parentheses is the corresponding header found in the raw data file.	Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Retail Analog/Benchmark
• LNP	• Retail Residence & Business (POTS)

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• LNP	• Retail Residence & Business (POTS)

P-11: LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution

Definition

Disconnect Timeliness is defined as the interval between the time ESI 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.

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.

Business Rules

The Disconnect Timeliness interval is determined for each 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 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.

Calculation

Disconnect Timeliness Interval = (a - b)

- a = Completion Date and Time in Central Office switch for each number on disconnect order
- b = Valid 'Number Ported' message received date & time

Average Disconnect Timeliness Interval = (c ÷ d)

- c = Sum of all Disconnect Timeliness Intervals
- d = Total Number of disconnected numbers completed in reporting period

Disconnect Timeliness Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Disconnected numbers completed in "X" days
- f = Total disconnect numbers completed in reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State, Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Order Number • Telephone Number / Circuit Number • Committed Due Date • Receipt Date / Time (ESI Number Manager) • Date/Time of Recent Change Notice	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation:	SQM Retail Analog/Benchmark:
• LNP	• 95% within 24 hours

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• LNP	• 95% within 24 hours

P-12: LNP-Total Service Order Cycle Time (TSOCT)

Definition

Total Service Order Cycle Time measures the interval from receipt of a valid service order request to the completion of the final service order associated with that service request.

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
- "L" appointment coded orders (indicating the customer has requested a later than offered interval)
- "S" missed appointment coded orders (indicating subscriber missed appointments), except for "SP" codes (indicating subscriber prior due date requested). This would include "S" codes assigned to subsequent due date changes.

Business Rules

The interval is determined for each order processed during the reporting period. This measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval.

This interval starts with the receipt of a valid service order request and stops when a completion notice is sent to the CLEC Interface (LENS, TAG OR EDI). Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are 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 same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

Reporting is by Fully Mechanized, Partially Mechanized and Non-Mechanized receipt of LSRs.

Calculation

Total Service Order Cycle Time = (a - b)

- a = Service Order Completion Notice Date
- b = Service Request Receipt Date

Average Total Service Order Cycle Time = (c ÷ d)

- c = Sum of all Total Service Order Cycle Times
- d = Total Number Service Orders Completed in Reporting Period

Total Service Order Cycle Time Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Total Number of Service Orders Completed in "X" minutes/hours
- f = Total Number of Service Orders Received in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Fully Mechanized; Partially Mechanized; Non-Mechanized
- Report in categories of <10 line/circuits; ≥ 10 line/circuits (except trunks)
- Dispatch / No Dispatch categories applicable to all levels except trunks
- Intervals 0-5, 5-10, 10-15, 15-20, 20-25, 25-30, ≥ 30 Days. The interval breakout is: 0-5 = 0-4.99, 5-10 = 5-9.99, 10-15 = 10-14.99, 15-20 = 15-19.99, 20-25 = 20-24.99, 25-30 = 25-29.99, ≥ 30 = 30 and greater.

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Interval for FOC • CLEC Company Name (OCN) • Order Number (PON) • Submission Date & Time (TICKET_ID) • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Geographic Scope **Note:** Code in parentheses is the corresponding header found in the raw data file	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• LNP	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 4: Maintenance & Repair

M&R-1: Missed Repair Appointments

Definition

The percent of trouble reports not cleared by the committed date and time.

Exclusions

- Trouble tickets canceled at the CLEC request.
- BellSouth trouble reports associated with internal or administrative service.
- Customer Provided Equipment (CPE) troubles or CLEC Equipment Trouble.

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 trouble report in his/her 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 access reports are not part of this measure because they are not a missed appointment.)

Note: Appointment intervals vary with force availability in the POTS environment. Specials and Trunk intervals are standard interval appointments of no greater than 24 hours. Standalone LNP historical data is not available in the maintenance systems (LMOS or WFA).

Calculation

Percentage of Missed Repair Appointments = (a ÷ b) X 100

- a = Count of Customer Troubles Not Cleared by the Quoted Commitment Date and Time
- b = Total Trouble reports closed in Reporting Period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • CLEC Company Name • Submission Date & Time (TICKET_ID) • Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • Geographic Scope **Note**: Code in parentheses is the corresponding header found in the raw data file.	• Report month • BellSouth Company Code • Submission Date & Time • Completion Date • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Retail Analog/Benchmark

SQM Level of Disaggregation	SQM Retail Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-2: Customer Trouble Report Rate

Definition

Initial and repeated customer direct or referred troubles reported within a calendar month per 100 lines/circuits in service.

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 Trouble.
- LMOS - Code 7 (Test OK), Code 8 (Found OK - In), Code 9 (Found OK - Out)
- WFA - No Trouble Found (NTF)

Business Rules

Customer Trouble Report Rate 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" lines, ports or combination that exist for the CLECs and BellSouth respectively at the end of the report month.

Calculation

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

- a = Count of Initial and Repeated Trouble Reports closed in the Current Period
- b = Number of Service Access Lines in service at End of the Report Period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • # Service Access Lines in Service at the end of period • Geographic Scope Note: Code in parentheses is the corresponding header found in the raw data file.	• Report month • BellSouth Company Code • Ticket Submission Date & Time • Ticket Completion Date • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • # Service Access Lines in Service at the end of period • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-3: Maintenance Average Duration

Definition

The Average duration of Customer Trouble Reports from the receipt of the Customer Trouble Report to the time the trouble report is cleared.

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 Trouble.

Business Rules

For Average Duration the clock starts on the date and time of the receipt of a correct repair request. The clock 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).

Calculation

Maintenance Duration = (a - b)

- a = Date and Time of Service Restoration
- b = Date and Time Trouble Ticket was Opened

Average Maintenance Duration = (c ÷ d)

- c = Total of all maintenance durations in the reporting period
- d = Total Closed Troubles in the reporting period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience:	Relating to BellSouth Performance:
• Report month • Total Tickets (LINE_NBR) • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMPLTN_DT) • Service Type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • Geographic Scope **Note**: Code in parentheses is the corresponding header found in the raw data file.	• Report month • Total Tickets • BellSouth Company Code • Ticket Submission Date • Ticket Submission Time • Ticket Completion Date • Ticket Completion Time • Total Duration Time • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail business

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-4: Percent Repeat Troubles within 30 Days

Definition

Closed trouble reports on the same line/circuit as a previous trouble report received within 30 calendar days as a percent of total troubles closed reported

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 Trouble.

Business Rules

Includes Customer trouble reports received within 30 days of an original Customer trouble report

Calculation

Percent Repeat Troubles within 30 Days = (a ÷ b) X 100

- a = Count of closed Customer Troubles where more than one trouble report was logged for the same service line within a continuous 30 days
- b = Total Trouble Reports Closed in Reporting Period

Report Structure

- Dispatch / Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • Total Tickets (LINE_NBR) • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMPLTN_DT) • Total and Percent Repeat Trouble Reports within 30 Days (TOT_REPEAT) • Service Type • Disposition and Cause (CAUSE_CD & CAUSE_DESC) • Geographic Scope Note: Code in parentheses is the corresponding header found in the raw data file.	• Report month • Total Tickets • BellSouth Company Code • Ticket Submission Date • Ticket Submission Time • Ticket Completion Date • Ticket Completion Time • Total and Percent Repeat Trouble Reports within 30 Days • Service Type • Disposition and Cause (Non-Design /Non-Special Only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Resale POTS	• Retail Residence and Business (POTS)
• Resale Design	• Retail Design
• UNE Loop + Port Combinations	• Retail Residence and Business
• UNE Loops	• Retail Residence and Business Dispatch
• UNE xDSL	• ADSL provided to Retail
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail

M&R-5: Out of Service (OOS) > 24 Hours

Definition

For Out of Service Troubles (no dial tone, cannot be called or cannot call out) the percentage of Total OOS Troubles cleared in excess of 24 hours. (All design services are considered to be out of service).

Exclusions

- Trouble Reports canceled at the CLEC request
- BellSouth Trouble Reports associated with administrative service
- Customer Provided Equipment (CPE) Troubles or CLEC Equipment Troubles.

Business Rules

Customer Trouble reports that are out of service and cleared in excess of 24 hours. The clock begins when the trouble report is created in LMOS/WFA and the trouble is counted if the elapsed time exceeds 24 hours.

Calculation

Out of Service (OOS) > 24 hours = (a ÷ b) X 100

- a = Total Cleared Troubles OOS > 24 Hours
- b = Total OOS Troubles in Reporting Period

Report Structure

- Dispatch / Non - Dispatch
- CLEC Specific
- BellSouth Aggregate
- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Total Tickets • CLEC Company Name • Ticket Submission Date & Time (TICKET_ID) • Ticket Completion Date (CMPLTN_DT • Percentage of Customer Troubles out of • Service > 24 Hours (OOS>24_FLAG) • Service type (CLASS_SVC_DESC) • Disposition and Cause (CAUSE_CD & CAUSE-DESC) • Geographic Scope **Note:** Code in parentheses is the corresponding header found in the raw data file.	• Report Month • Total Tickets • BellSouth Company Code • Ticket Submission Date • Ticket Submission time • Ticket Completion Date • Ticket Completion Time • Percent of Customer Troubles out of Service > 24 Hours • Service type • Disposition and Cause (Non-Design/Non-Special only) • Trouble Code (Design and Trunking Services) • Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale Residence	• Retail Residence
• Resale Business	• Retail Business
• Resale Design	• Retail Design
• Resale PBX	• Retail PBX
• Resale Centrex	• Retail Centrex

SQM Level of Disaggregation	SQM Analog/Benchmark
• Resale ISDN	• Retail ISDN
• 2W Analog Loop Design	• Retail Residence & Business Dispatch
• 2W Analog Loop Non – Design	• Retail Residence & Business (POTS) (Exclusion of switch-based feature troubles)
• UNE Digital Loop < DS1	• Retail Digital Loop < DS1
• UNE Digital Loop ≥ DS1	• Retail Digital Loop ≥ DS1
• UNE Loop + Port Combinations	• Retail Residence & Business
• UNE Switch ports	• Retail Residence & Business (POTS)
• UNE Combo Other	• Retail Residence, Business & Design Dispatch
• UNE xDSL (HDSL, ADSL and UCL)	• ADSL provided to Retail
• UNE ISDN	• Retail ISDN – BRI
• UNE Line Sharing	• ADSL provided to Retail
• Local Interconnection Trunks	• Parity with Retail
• Local Transport (Unbundled Interoffice Transport)	• Retail DS1/DS3 Interoffice

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

M&R-6: Average Answer Time – Repair Centers

Definition

This measures the average time a customer is in queue when calling a BellSouth Repair Center.

Exclusions

None

Business Rules

The clock 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. The clock stops when the repair attendant answers the call (abandoned calls are not included).

Note: The Total Column is a combined BellSouth Residence and Business number.

Calculation

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

- a = Time BellSouth Repair Attendant Answers Call
- b = Time of entry into queue after ACD Selection

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

- c = Sum of all Answer Times
- d = Total number of calls by reporting period

Report Structure

- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• CLEC Average Answer Time	• BellSouth Average Answer Time

SQM Disaggregation - Analog / Benchmark

SQM Level of Disaggregation	Retail Analog / Benchmark
• Region. CLEC/BellSouth Service Centers and BellSouth Repair Centers are regional.	• For CLEC, Average Answer Times in UNE Center and BRMC are comparable to the Average Answer Times in the BellSouth Repair Centers.

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

M&R-7: Mean Time To Notify CLEC of Network Outages

Definition

BellSouth will inform the CLEC of any Network outages (key customer accounts)

Exclusions

None

Business Rules

The time it takes for the BellSouth Network Reliability Center (NRC) to notify the CLEC and BellSouth of a customer impacting network incident in equipment that may be utilized by the CLEC. When the BellSouth NRC becomes aware of a network incident, the CLEC and BellSouth will be notified electronically. The notification time for each outage will be measured in minutes and divided by the number of outages for the reporting period. The CLECs will be notified the same way and at the same time as BellSouth Retail. These are broadcast messages. It is up to those receiving the message to determine if they have customers affected by the incident.

Calculation

Time to Notify CLEC = (a - b)

- a = Date and Time BellSouth Notified CLEC
- b = Date and time BellSouth detected network incident

Mean Time to Notify CLEC = (c ÷ d)

- c = Sum of all Times to Notify CLEC
- d = Count of Network Incidents

Report Structure

- BellSouth Aggregate
- CLEC Aggregate
- CLEC Specific

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Major Network events • Date/Time of Incident • Date/Time of Notification	• Report Month • Major Network events • Date/Time of Incident • Date/Time of Notification

SQM Disaggregation - Analog / Benchmark

SQM Level of Disaggregation	Retail Analog / Benchmark
• BellSouth Aggregate • CLEC Aggregate • CLEC Specific	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 5: Billing

B-1: Invoice Accuracy

Definition

This measure provides the percentage of accuracy of the billing invoices rendered to CLECs during the current month.

Exclusions

- Adjustments not related to billing errors (e.g., credits for service outage, special promotion credits, adjustments to satisfy the customer)
- Test Accounts

Business Rules

The accuracy of billing invoices delivered by BellSouth to the CLEC must enable them to provide a degree of billing accuracy comparative 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.

Calculation

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

- a = Absolute Value of Total Billed Revenues during current month
- b = Absolute Value of Billing Related Adjustments during current month

Report Structure

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

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report Month • Invoice Type - UNE - Resale - Interconnection • Total Billed Revenue • Billing Related Adjustments	• Report month • Retail Type - CRIS - CABS • Total Billed Revenue • Billing Related Adjustments

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Product / Invoice Type - Resale - UNE - Interconnection	• CLEC Invoice Accuracy is comparable to BellSouth Invoice Accuracy

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• CLEC State • BellSouth State	• Parity with Retail

B2: Mean Time to Deliver Invoices

Definition

Bill Distribution is calculated as follows: CRIS BILLS-The number of workdays is reported for CRIS bills. This is calculated by counting the Bill Period date as the first work day. Weekends and holidays are excluded when counting workdays. J/N Bills are counted in the CRIS work day category for the purposes of the measurement since their billing account number (Q account) is provided from the CRIS system.

CABS BILLS-The number of calendar days is reported for CABS 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.

Exclusions

Any invoices rejected due to formatting or content errors.

Business Rules

This report measures the mean interval for timeliness of billing records delivered to CLECs in an agreed upon format. CRIS-based invoices are measured in business days, and CABS-based invoices in calendar days.

Calculation

Invoice Timeliness = (a - b)

- a = Invoice Transmission Date
- b = Close Date of Scheduled Bill Cycle

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
  - Region
  - State

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report month • Invoice Type - UNE - Resale - Interconnection • Invoice Transmission Count • Date of Scheduled Bill Close	• Report month • Invoice Type - CRIS - CABS • Invoice Transmission Count • Date of Scheduled Bill Close

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
Product / Invoice Type • Resale • UNE • Interconnection	• CRIS-based invoices will be released for delivery within six (6) business days. • CABS-based invoices will be released for delivery within eight (8) calendar days. • CLEC Average Delivery Intervals for both CRIS and CABS Invoices are comparable to BellSouth Average delivery for both systems.

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• CLEC State - CRIS - CABS • BellSouth Region	• Parity with Retail

B3: Usage Data Delivery Accuracy

Definition

This measurement captures the percentage of recorded usage that is delivered error free and in an acceptable format to the appropriate Competitive Local Exchange Carrier (CLEC). These percentages will provide the necessary data for use as a comparative measurement for BellSouth performance. This measurement captures Data Delivery Accuracy rather than the accuracy of the individual usage recording.

Exclusions

None

Business Rules

The accuracy of the data delivery of usage records delivered by BellSouth to the CLEC must enable them to provide a degree of accuracy comparative to BellSouth bills rendered to their retail customers. If errors are detected in the delivery process, they are investigated, evaluated and documented. Errors are corrected and the data retransmitted to the CLEC.

Calculation

Usage Data Delivery Accuracy = (a - b) ÷ a X 100

- a = Total number of usage data packs sent during current month
- b = Total number of usage data packs requiring retransmission during current month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  - Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report Month • Record Type - BellSouth Recorded - Non-BellSouth Recorded	• Report month • Record Type

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Region	• CLEC Usage Data Delivery Accuracy is comparable to BellSouth Usage Data Delivery Accuracy

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• CLEC State • BellSouth Region	• Parity with Retail

B4: Usage Data Delivery Completeness

Definition

This measurement provides percentage of complete and accurately recorded usage data (usage recorded by BellSouth and usage recorded by other companies and sent to BellSouth for billing) that is processed and transmitted to the CLEC within thirty (30) days of the message recording date. A parity measure is also provided showing completeness of BellSouth messages processed and transmitted via CMDS. BellSouth delivers its own retail usage from recording location to billing location via CMDS as well as delivering billing data to other companies. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.

Exclusions

None

Business Rules

The purpose of these measurements is to demonstrate the level of quality of usage data delivered to the appropriate CLEC. Method of delivery is at the option of the CLEC.

Calculation

Usage Data Delivery Completeness = (a ÷ b) X 100

- a = Total number of Recorded usage records delivered during current month that are within thirty (30) days of the message recording date
- b = Total number of Recorded usage records delivered during the current month

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report Month • Record Type - BellSouth Recorded - Non-BellSouth Recorded	• Report month • Record Type

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Region	• CLEC Usage Data Delivery Completeness is comparable to BellSouth Usage Data Delivery Completeness

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

B5: Usage Data Delivery Timeliness

Definition

This measurement provides a percentage of 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 parity 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.

Exclusions

None

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.

Calculation

Usage Data Delivery Timeliness Current month = (a ÷ b) X 100

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

Report Structure

- CLEC Aggregate
- CLEC Specific
- BellSouth Aggregate
- Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report Month • Record Type - BellSouth Recorded - Non-BellSouth Recorded	• Report Monthly • Record Type

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Region	• CLEC Usage Data Delivery Timeliness is comparable to BellSouth Usage Data Delivery Timeliness

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

B6: Mean Time to Deliver Usage

Definition

This measurement provides the average time it takes to deliver Usage Records to a CLEC. A parity 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.

Exclusions

None

Business Rules

The purpose of this measurement is to demonstrate the average number of days it takes BellSouth to deliver Usage data to the appropriate CLEC. Usage data is mechanically transmitted or mailed to the CLEC data processing center once daily. Method of delivery is at the option of the CLEC.

Calculation

Mean Time to Deliver Usage = (a X b) ÷ c

- a = Volume of Records Delivered
- b = Estimated number of days to deliver
- c = Total Record Volume Delivered

Note: Any usage record falling in the 30+ day interval will be added using an average figure of 31.5 days.

Report Structure

- CLEC Aggregate
- CLEC Specific
- BellSouth Aggregate
- Region

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report Month • Record Type - BellSouth Recorded - Non-BellSouth Recorded	• Report Monthly • Record Type

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Region	• Mean Time to Deliver Usage to CLEC is comparable to Mean Time to Deliver Usage to BellSouth

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

B7: Recurring Charge Completeness

Definition

This measure captures percentage of fractional recurring charges appearing on the correct bill.

Exclusions

None

Business Rules

The effective date of the recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.

Calculation

Recurring Charge Completeness = (a ÷ b) X 100

- a = Count of fractional recurring charges that are on the correct bill[1]
- b = Total count of fractional recurring charges that are on the correct bill

[1]Correct bill = next available bill

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report month • Invoice type • Total recurring charges billed • Total billed on time	• Report month • Retail Analog • Total recurring charges billed • Total billed on time

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
Product/Invoice Type	
• Resale	• Parity
• UNE	• Benchmark 90%
• Interconnection	• Benchmark 90%

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

B8: Non-Recurring Charge Completeness

Definition

This measure captures percentage of non-recurring charges appearing on the correct bill.

Exclusions

None

Business Rules

The effective date of the non-recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.

Calculation

Non-Recurring Charge Completeness = (a ÷ b) X 100

- a = Count of non-recurring charges that are on the correct bill[1]
- b = Total count of non-recurring charges that are on the correct bill

[1]Correct bill = next available bill

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report month • Invoice type • Total non-recurring charges billed • Total billed on time	• Report month • Retail Analog • Total non-recurring charges billed • Total billed on time

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
Product/Invoice Type	
• Resale	• Parity
• UNE	• Benchmark 90%
• Interconnection	• Benchmark 90%

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 6: Operator Services And Directory Assistance

OS-1: Speed to Answer Performance/Average Speed to Answer - Toll

Definition

Measurement of the average time in seconds calls wait before answered by a toll operator.

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

Speed to Answer Performance/Average Speed to Answer - Toll = a ÷ b

- a = Total queue time
- b = Total calls answered

Note: Total queue time includes time that answered calls wait in queue as well as time abandoned calls wait in queue prior to abandonment.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
  - State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth's Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP
- Month
- Call Type (Toll)
- Average Speed of Answer

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure	
No	Tier I
	Tier II

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

OS-2: Speed to Answer Performance/Percent Answered with "X" Seconds – Toll

Definition

Measurement of the percent of toll calls that are answered in less than ten seconds

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

The Percent Answered within "X" Seconds measurement for toll is derived by using the BellCore Statistical Answer Conversion Tables, to convert the Average Speed to Answer measure into a percent of calls answered within "X" seconds. The BellCore Conversion Tables are specific to the defined parameters of work time, number of operators, max queue size and call abandonment rates.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
  - State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth's Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP
- Month
- Call Type (Toll)
- Average Speed of Answer

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation:	Retail Analog/Benchmark:
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

DA-1: Speed to Answer Performance/Average Speed to Answer – Directory Assistance (DA)

Definition

Measurement of the average time in seconds calls wait before answered by a DA operator.

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

Speed to Answer Performance/Average Speed to Answer – Directory Assistance (DA) = a ÷ b

- a = Total queue time
- b = Total calls answered

Note: Total queue time includes time that answered calls wait in queue as well as time abandoned calls wait in queue prior to abandonment.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
  - State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth's Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP
- Month
- Call Type (DA)
- Average Speed of Answer

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

DA-2: Speed to Answer Performance/Percent Answered within "X" Seconds – Directory Assistance (DA)

Definition

Measurement of the percent of DA calls that are answered in less than twelve seconds.

Exclusions

None

Business Rules

The clock starts when the customer enters the queue and the clock stops when a BellSouth representative answers the call or the customer abandons the call. The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance. The system makes no distinction between CLEC customers and BellSouth customers.

Calculation

The Percent Answered within "X" Seconds measurement for DA is derived by using the BellCore Statistical Answer Conversion Tables, to convert the Average Speed to Answer measure into a percent of calls answered within "X" seconds. The BellCore Conversion Tables are specific to the defined parameters of work time, number of operators, max queue size and call abandonment rates.

Report Structure

- Reported for the aggregate of BellSouth and CLECs
  - State

Data Retained (on Aggregate Basis)

- For the items below, BellSouth's Performance Measurement Analysis Platform (PMAP) receives a final computation; therefore, no raw data file is available in PMAP.
- Month
- Call Type (DA)
- Average Speed of Answer

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 7: Database Update Information

D-1: Average Database Update Interval

Definition

This report measures the interval from receipt of the database change request to the completion of the update to the database for Line Information Database (LIDB), Directory Assistance and Directory Listings.

Exclusions

- Updates Canceled by the CLEC
- Initial update when supplemented by CLEC
- BellSouth updates associated with internal or administrative use of local services.

Business Rules

The interval for this measure begins with the date and time stamp when a service order is completed and the completion notice is released to all systems to be updated with the order information including Directory Assistance, Directory Listings, and Line Information Database (LIDB). The end time stamp is the date and time of completion of updates to the system.

For BellSouth Results:

The BellSouth computation is identical to that for the CLEC with the clarifications noted below.

Other Clarifications and Qualification:

- For LIDB, the elapsed time for a BellSouth update is measured from the point in time when the BellSouth file maintenance process makes the LIDB update information available until the date and time reported by BellSouth that database updates are completed.
- Results for the CLECs are captured and reported at the update level by Reporting Dimension (see below).
- The Completion Date is the date upon which BellSouth issues the Update Completion Notice to the CLEC.
- If the CLEC initiates a supplement to the originally submitted update and the supplement reflects changes in customer requirements (rather than responding to BellSouth initiated changes), then the update submission date and time will be the date and time of BellSouth receipt of a syntactically correct update supplement. Update activities responding to BellSouth initiated changes will not result in changes to the update submission date and time used for the purposes of computing the update completion interval.
- Elapsed time is measured in hours and hundredths of hours rounded to the nearest tenth of an hour.
- Because this should be a highly automated process, the accumulation of elapsed time continues through off-schedule, weekends and holidays; however, scheduled maintenance windows are excluded.

Calculation

Update Interval = (a - b)

- a = Completion Date & Time of Database Update
- b = Submission Date and Time of Database Change

Average Update Interval = (c ÷ d)

- c = Sum of all Update Intervals
- d = Total Number of Updates Completed During Reporting Period

Report Structure

- CLEC Specific (Under development)
- CLEC Aggregate
- BellSouth Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• (Under Development)	• (Under Development)

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation:	Retail Analog/Benchmark:
Database Type • LIDB • Directory Listings • Directory Assistance	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

D-2: Percent Database Update Accuracy

Definition

This report measures the accuracy of database updates by BellSouth for Line Information Database (LIDB) Directory Assistance and Directory Listings using a statistically valid sample of LSRs/Orders in a manual review. This manual review is not conducted on BellSouth Retail Orders.

Exclusions

- Updates canceled by the CLEC
- Initial update when supplemented by CLEC
- CLEC orders that had CLEC errors
- BellSouth updates associated with internal or administrative use of local services.

Business Rules

For each update completed during the reporting period, the original update that the CLEC sent to BellSouth is compared to the database following completion of the update by BellSouth. An update is "completed without error" if the database completely and accurately reflects the activity specified on the original and supplemental update (e.g., orders) submitted by the CLEC. Each database (e.g., LIDB, Directory Assistance and Directory Listings) should be separately tracked and reported.

A statistically valid sample of CLEC Orders will be pulled each month. The sample will be used to test the accuracy of the database update process. This is a manual process.

Calculation

Percent Update Accuracy = (a ÷ b) X 100

- a = Number of Updates Completed Without Error
- b = Number Updates Completed

Report Structure

- CLEC Aggregate
- CLEC Specific (not available in this report)
- BellSouth Aggregate (not available in this report)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Report Month • CLEC Order Number (so_nbr) and PON (PON) • Local Service Request (LSR) • Order Submission Date • Number of Orders Reviewed Note: Code in parentheses is the corresponding header found in the raw data file.	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	Retail Analog/Benchmark:
Database Type • LIDB • Directory Database	• 95% Accurate

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

D-3: Percent NXXs and LRNs Loaded by the LERG Effective Date

Definition

Measurement of the percent of NXX(s) and Location Routing Numbers LRN(s) loaded and tested in new end office and/or tandem switches by the Local Exchange Routing Guide (LERG) effective date when facilities are in place. BellSouth has a single provisioning process for both NXX(s) and LRN(s). In this measure BellSouth will identify whether or not a particular NXX has been flagged as LNP capable (set triggers for dips) by the LERG effective date.

An LRN is assigned by the owner of the switch and is placed into the software translations for every switch to be used as an administrative pointer to route NXX(s) in LNP capable switches. The LRN is a result of Local Number Porting and is housed in a national database provided by the Number Portability Administration Center (NPAC). The switch owner is responsible for notifying NPAC and requesting the effective date that will be reflected in the LERG. The national database downloads routing tables into BellSouth's Service Control Point (SCP) regional databases, which are queried by switches when routing ported numbers.

The basic NXX routing process includes the addition of all NXX(s) in the response translations. This addition to response translations is what supports LRN routing. Routing instructions for all NXX(s), including LRN(s), are received from the Advance Routing & Trunking System (ARTS) and all routing, including response, is established based on the information contained in the Translation Work Instructions (TWINs) document.

Exclusions

- Activation requests where the CLEC's interconnection arrangements and facilities are not in place by the LERG effective date.
- Expedite requests

Business Rules

Data for the initial NXX(s) and LRN(s) in a local calling area will be based on the LERG effective date or completion of the initial interconnection trunk group(s), whichever is longer. Data for additional NXX(s) in the local calling area will be based on the LERG effective date. The LERG effective date is loaded into the system at the request of the CLEC. It is contingent upon the CLEC to engineer, order, and install interconnection arrangements and facilities prior to that date.

The total Count of NXX(s) and LRN(s) that were scheduled to be loaded and those that were loaded by the LERG effective date in BellSouth switches will be captured in the Work Force Administration -Dispatch In database.

Calculation

Percent NXXs/LRNs Loaded and Tested Prior to the LERG Effective Date = (a ÷ b) X 100

- a = Count of NXXs and LRNs loaded by the LERG effective date
- b = Total NXXs and LRNs to be scheduled and loaded by the LERG effective date

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth (Not Applicable)

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Company Name • Company Code • NPA/NXX • LERG Effective Date • Loaded Date	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Geographic scope - Region	• 100% by LERG effective date

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 8: E911

E-1: Timeliness

Definition

Measures the percent of batch orders for E911 database updates (to CLEC resale and BellSouth retail records) processed successfully within a 24-hour period.

Exclusions

- Any resale order canceled by a CLEC
- Facilities-based CLEC orders

Business Rules

The 24-hour processing period is calculated based on the date and time processing starts on the batch orders and the date and time processing stops on the batch orders. Mechanical processing starts when SCC (the BellSouth E911 vendor) receives E911 files containing batch orders extracted from the BellSouth Service Order Control System (SOCS). Processing stops when SCC loads the individual records to the E911 database. The E911 database includes updates to the Automatic Location Identification (ALI) database. The system makes no distinction between CLEC resale records and BellSouth retail records.

Calculation

E911 Timeliness = (a ÷ b) X 100

- a = Number of batch orders processed within 24 hours
- b = Total number of batch orders submitted

Report Structure

Reported for the aggregate of CLEC resale updates and BellSouth retail updates

- State
- Region

Data Retained

- Report month
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

E-2: Accuracy

Definition

Measures the percent of E911 telephone number (TN) record updates (to CLEC resale and BellSouth retail records) processed successfully for E911 (including the Automatic Location Identification (ALI) database).

Exclusions

- Any resale order canceled by a CLEC
- Facilities-based CLEC orders

Business Rules

Accuracy is based on the number of records processed without error at the conclusion of the processing cycle. Mechanical processing starts when SCC (the BellSouth E911 vendor) receives E911 files containing telephone number (TN) records extracted from BellSouth's Service Order Control System (SOCS). The system makes no distinction between CLEC resale records and BellSouth retail records.

Calculation

E911 Accuracy = (a ÷ b) X 100

- a = Number of record individual updates processed with no errors
- b = Total number of individual record updates

Report Structure

Reported for the aggregate of CLEC resale updates and BellSouth retail updates

- State
- Region

Data Retained

- Report month
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

E-3: Mean Interval

Definition

Measures the mean interval processing of E911 batch orders (to update CLEC resale and BellSouth retail records) including processing against the Automatic Location Identification (ALI) database.

Exclusions

- Any resale order canceled by a CLEC
- Facilities-based CLEC orders

Business Rules

The processing period is calculated based on the date and time processing starts on the batch orders and the date and time processing stops on the batch orders. Data is posted is 4-hour increments up to and beyond 24 hours. The system makes no distinction between CLEC resale records and BellSouth retail records.

Calculation

E911 Interval = (a - b)

- a = Date and time of batch order completion
- b = Date and time of batch order submission

E911 Mean Interval = (c ÷ d)

- c = Sum of all E911 Intervals
- d = Number of batch orders completed

Report Structure

Reported for the aggregate of CLEC resale updates and BellSouth retail updates

- State
- Region

Data Retained

- Report month
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• None	• Parity by Design

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Section 9: Trunk Group Performance

TGP-1: Trunk Group Performance-Aggregate

Definition

The Trunk Group Performance report displays, over a reporting cycle, aggregate, average trunk group blocking data for each hour of each day of the reporting cycle, for both CLEC affecting and BellSouth affecting trunk groups.

Exclusions

- Trunk Groups for which valid data is not available for an entire study period
- Duplicate trunk group information

Business Rules

The purpose of the Trunk Group Performance Report is to provide trunk blocking measurements on CLEC and BellSouth trunk groups for comparison only. It is not the intent of the report that it be used for network management and/or engineering.

Monthly Average Blocking:

- The reporting cycle includes both business and non-business days in a calendar month.
- Monthly average blocking values are calculated for each trunk group for each of the 24 time consistent hours across a reporting cycle.

Aggregate Monthly Blocking:

- Used to compare aggregate blocking across trunk groups which terminate traffic at CLEC points of presence versus BellSouth switches.
- Aggregate monthly blocking data is calculated for each hour of the day across all trunk groups assigned to a category.

Trunk Categorization:

This report displays, over a reporting cycle, aggregate, average blocking data for each hour of a day. Therefore, for each reporting cycle, 24 blocking data points are generated for two aggregate groups of selected trunk groups. These groups are CLEC affecting and BellSouth affecting trunk groups. In order to assign trunk groups to each aggregate group, all trunk groups are first assigned to a category. A trunk group's end points and the type of traffic that is transmitted on it define a category. Selected categories of trunk groups are assigned to the aggregate groups so that trunk reports can be generated. The categories to which trunk groups have been assigned for this report are as follows.

CLEC Affecting Categories:

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

BellSouth Affecting Categories:

	Point A	Point B
Category 9:	BellSouth End Office	BellSouth End Office

Calculation

Monthly Average Blocking:

- For each hour of the day, each day's raw data are summed across all valid measurements days in a report cycle for blocked and attempted calls.
- The sum of the blocked calls is divided by the total number of calls attempted in a reporting period.

Aggregate Monthly Blocking:

- For each hour of the day, the monthly sums of the blocked and attempted calls from each trunk group are separately aggregated over all trunk groups within each assigned category.
- The total blocked calls is divided by the total call attempts within a group to calculate an aggregate monthly blocking for each assigned group.
- The result is an aggregate monthly average blocking value for each of the 24 hours by group.
- The difference between the CLEC and BellSouth affecting trunk groups are also calculated for each hour.

Report Structure

- CLEC Aggregate
- BellSouth Aggregate
  - State

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Total Trunk Groups • Number of Trunk Groups by CLEC • Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group	• Report Month • Total Trunk Groups • Aggregate Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• CLEC aggregate • BellSouth aggregate	• Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark:
• CLEC aggregate • BellSouth aggregate	• Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs and 9 for BellSouth

TGP-2: Trunk Group Performance-CLEC Specific

Definition

The Trunk Group Performance report displays, over a reporting cycle, aggregate, average trunk group blocking data for each hour of each day of the reporting cycle, for both CLEC affecting and BellSouth affecting trunk groups.

Exclusions

- Trunk Groups for which valid data is not available for an entire study period
- Duplicate trunk group information

Business Rules

The purpose of the Trunk Group Performance Report is to provide trunk blocking measurements on CLEC and BellSouth trunk groups for comparison only. It is not the intent of the report that it be used for network management and/or engineering.

Monthly Average Blocking:

- The reporting cycle includes both business and non-business days in a calendar month.
- Monthly average blocking values are calculated for each trunk group for each of the 24 time consistent hours across a reporting cycle.

Aggregate Monthly Blocking:

- Used to compare aggregate blocking across trunk groups which terminate traffic at CLEC points of presence versus BellSouth switches.
- Aggregate monthly blocking data is calculated for each hour of the day across all trunk groups assigned to a category.

Trunk Categorization:

- This report displays, over a reporting cycle, aggregate, average blocking data for each hour of a day. Therefore, for each reporting cycle, 24 blocking data points are generated for two aggregate groups of selected trunk groups. These groups are CLEC affecting and BellSouth affecting trunk groups. In order to assign trunk groups to each aggregate group, all trunk groups are first assigned to a category. A trunk group's end points and the type of traffic that is transmitted on it define a category. Selected categories of trunk groups are assigned to the aggregate groups so that trunk reports can be generated. The categories to which trunk groups have been assigned for this report are as follows.

CLEC Affecting Categories:

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

BellSouth Affecting Categories:

	Point A	Point B
Category 9:	BellSouth End Office	BellSouth End Office

Calculation:

Monthly Average Blocking:

- For each hour of the day, each day's raw data are summed across all valid measurements days in a report cycle for blocked and attempted calls.
- The sum of the blocked calls is divided by the total number of calls attempted in a reporting period.

Aggregate Monthly Blocking:

- For each hour of the day, the monthly sums of the blocked and attempted calls from each trunk group are separately aggregated over all trunk groups within each assigned category.
- The total blocked calls is divided by the total call attempts within a group to calculate an aggregate monthly blocking for each assigned group.
- The result is an aggregate monthly average blocking value for each of the 24 hours by group.
- The difference between the CLEC and BellSouth affecting trunk groups are also calculated for each hour.

Report Structure

- CLEC Specific
  - State

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Total Trunk Groups • Number of Trunk Groups by CLEC • Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group	• Report Month • Total Trunk Groups • Aggregate Hourly blocking per trunk group • Hourly usage per trunk group • Hourly call attempts per trunk group

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• CLEC trunk group	• Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark:
• CLEC trunk group • BellSouth trunk group	• Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth

Section 10: Collocation

C-1: Collocation Average Response Time

Definition

Measures the average time (counted in calendar days) from the 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. Within 10 calendar days after having received a bona fide application for physical collocation, BellSouth must respond as to whether space is available or not.

Exclusions

Any application canceled by the CLEC

Business Rules

The clock starts on the date that BellSouth receives a complete and accurate collocation application accompanied by the appropriate application fee if required. The clock stops on the date that BellSouth returns a response. The clock will restart upon receipt of changes to the original application request.

Calculation

Response Time = (a - b)

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

Average Response Time = (c ÷ d)

- c = Sum of all Response Times
- d = Count of Responses Returned within Reporting Period

Report Structure

- Individual CLEC (alias) aggregate
- Aggregate of all CLECs

Data Retained

- Report period
- Aggregate data

SQM Disaggregation - Analog/Benchmark

Level of Disaggregation	Retail Analog/Benchmark
• State • Virtual-Initial • Virtual-Augment • Physical Caged-Initial • Physical Caged-Augment • Physical-Cageless-Initial • Physical Cageless-Augment	• Virtual - 20 Calendar Days • Physical Caged - 30 Calendar Days • Physical Cageless - 30 Calendar Days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

C-2: Collocation Average Arrangement Time

Definition

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.

Exclusions

Any Bona Fide firm order canceled by the CLEC

Business Rules

The clock starts on the date that BellSouth receives a complete and accurate Bone Fide firm order accompanied by the appropriate fee. The clock stops on the date that BellSouth completes the collocation arrangement and notifies the CLEC.

Calculation

Arrangement Time = (a - b)

- a = Date Collocation Arrangement is Complete
- b = Date Order for Collocation Arrangement Submitted

Average Arrangement Time = (c ÷ d)

- c = Sum of all Arrangement Times
- d = Total Number of Collocation Arrangements Completed during Reporting Period.

Report Structure

- Individual CLEC (alias) aggregate
- Aggregate of all CLECs

Data Retained

- Report period
- Aggregate data

SQM Disaggregation - Retail Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• State • Virtual-Initial • Virtual-Augment • Physical Caged-Initial • Physical Caged-Augment • Physical Cageless-Initial • Physical Cageless-Augment	• Virtual - 50 Calendar Days (Ordinary) • Virtual - 75 Calendar Days (Extraordinary) • Physical Caged - 90 Calendar Days (Ordinary) • Physical Caged - 130 Calendar Days (Extraordinary) • Physical Cageless - 90 Calendar Days (Ordinary) • Physical Cageless - 130 Calendar Days (Extraordinary)

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark:
• Not Applicable	• Not Applicable

C-3: Collocation Percent of Due Dates Missed

Definition

Measures the percent of missed due dates for both virtual and physical collocation arrangements.

Exclusions

Any Bona Fide firm order canceled by the CLEC

Business Rules

Percent Due Dates Missed is the percent of total collocation arrangements which BellSouth is unable to complete by end of the BellSouth committed due date. The clock starts on the date that BellSouth receives a complete and accurate Bona Fide firm order accompanied by the appropriate fee if required. The arrangement is considered a missed due date if it is not completed on or before the committed due date.

Calculation

% of Due Dates Missed = (a ÷ b) X 100

- a = Number of Completed Orders that were not completed within BellSouth Committed Due Date during Reporting Period
- b = Number of Orders Completed in Reporting Period

Report Structure

- Individual CLEC (alias) aggregate
- Aggregate of all CLECs

Data Retained

- Report period
- Aggregate data

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• State • Virtual-Initial • Virtual-Augment • Physical Caged-Initial • Physical Caged-Augment • Physical Cageless-Initial • Physical Cageless-Augment	• ≥ 95% on time

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• All Collocation Arrangements	• ≥ 95% on time.

Section 11: Change Management

CM-1: Timeliness of Change Management Notices

Definition

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.

Exclusions

- Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes. For example: a patch to fix a software problem.
- Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP)

Business Rules

This metric is designed to measure the percent of change management notices sent to the CLECs according to notification standards and time frames 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 on the notification date. The clock stops 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 would restart. Based on release constraints for defects/expedites, notification may be less than the agreed upon interval in the CCP for new features.

Calculation

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

- a = Total number of Change Management Notifications Sent Within Required Time frames
- b = Total Number of Change Management Notifications Sent

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• Region	• 95% ≥ 30 days of Release

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% ≥ 30 days of Release

CM-2: Change Management Notice Average Delay Days

Definition

Measures the average delay days for change management system release notices sent outside the time frame set forth in the Change Control Process.

Exclusions

- Changes to release dates for reasons outside BellSouth control, such as the system vendor
- Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process

Business Rules

This metric is designed to measure the percent of change management notices sent to the CLECs according to notification standards and time frames 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 on the notification due date. The clock stops 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 would restart. Based on release constraints for defects/expedites, notification may be less than the agreed upon interval in the CCP for new features.

Calculation

Change Management Notice Delay Days = (a - b)

- a = Date Notice Sent
- b = Date Notice Due

Change Management Notice Average Delay Days = (c ÷ d)

- c = Sum of all Change Management Notice Delay Days
- d = Total Number of Notices Sent Late

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation:	Retail Analog/Benchmark:
• Region	• 90% ≤ 8 Days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-3: Timeliness of Documents Associated with Change

Definition

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.

Exclusions

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

Business Rules

This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to documentation standards and time frames 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 on the business rule documentation release date. The clock stops 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 would restart.

Calculation

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

- a = Change Management Documentation Sent Within Required Time frames after Notices
- b = Total Number of Change Management Documentation Sent

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Region	• 95% ≥ 30 days if new features coding is required • 95% ≥ 5 days for documentation defects, corrections or clarifications

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% ≥ 30 days of the change

CM-4: Change Management Documentation Average Delay Days

Definition

Measures the average delay days for requirements or business rule documentation sent outside the time frames set forth in the Change Control Process.

Exclusions

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

Business Rules

This metric is designed to measure the percent of requirements or business rule documentation sent to the CLECs according to documentation standards and time frames 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 on the business rule documentation release date. The clock stops 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 would restart.

Calculation

Change Management Documentation Delay Days = (a - b)

- a = Date Documentation Provided
- b = Date Documentation Due

Change Management Documentation Average Delay Days = (c ÷ d)

- c = Sum of all CM Documentation Delay Days
- d = Total Change Management Documents Sent

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Notice Date
- Release Date

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark:
• Region	• 90% ≤ 8 Days

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-5: Notification of CLEC Interface Outages

Definition

Measures the time it takes BellSouth to notify the CLEC of an outage of an interface.

Exclusions

None

Business Rules

This measure is designed to notify the CLEC of interface outages within 15 minutes of BellSouth's verification that an outage has taken place. This metric will be expressed as a percentage.

Calculation

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

- a = Number of Interface Outages where CLECS are notified within 15 minutes
- b = Total Number of Interface Outages

Report Structure

- CLEC Aggregate

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Number of Interface Outages • Number of Notifications ≤ 15 minutes	• Not Applicable

SQM Level of Disaggregation - Analog/Benchmark

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

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

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

Appendix A: Reporting Scope

A-1: Standard Service Groupings

See individual reports in the body of the SQM.

A-2: Standard Service Order Activities

These are the generic BellSouth/CLEC service order activities which are included in the Pre-Ordering, Ordering, and Provisioning sections of this document. It is not meant to indicate specific reporting categories.

Service Order Activity Types

- Service Migrations Without Changes
- Service Migrations With Changes
- Move and Change Activities
- Service Disconnects (Unless noted otherwise)
- New Service Installations

Pre-Ordering Query Types

- Address
- Telephone Number
- Appointment Scheduling
- Customer Service Record
- Feature Availability
- Service Inquiry

Maintenance Query Types:

TAFI - TAFI queries the systems below

- CRIS
- March
- Predictor
- LMOS
  - DLR
  - DLETH
  - LMOSupd
- LNP
- NIW
- OSPCM
- SOCS

Report Levels

- CLEC RESH
- CLEC State
- CLEC Region
- Aggregate CLEC State

- Aggregate CLEC Region
- BellSouth State
- BellSouth Region

Appendix B: Glossary of Acronyms and Terms

Symbols used in calculations

Σ A mathematical symbol representing the sum of a series of values following the symbol.

- A mathematical operator representing subtraction.

+ A mathematical operator representing addition.

÷ A mathematical operator representing division.

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

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

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

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

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

A

ACD: Automatic Call Distributor - A service that provides status monitoring of agents in a call center and routes high volume incoming telephone calls to available agents while collecting management information on both callers and attendants.

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

ALEC: Alternative Local Exchange Company = FL CLEC

ADSL: Asymmetrical Digital Subscriber Line

ASR: Access Service Request - A request for access service terminating delivery of carrier traffic into a Local Exchange Carrier's network.

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

ATLASTN: ATLAS software contract for Telephone Number.

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

B

BFR: Bona Fied Request

BILLING: The process and functions by which billing data is collected and by which account information is processed in order to render accurate and timely billing.

BOCRIS: Business Office Customer Record Information System (Front-end to the CRIS database.)

BRI: Basic Rate ISDN

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

BellSouth : BellSouth Telecommunications, Inc.

C

CABS: Carrier Access Billing System

CCC: Coordinated Customer Conversions

CCP: Change Control Process

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

CKTID: A unique identifier for elements combined in a service configuration

CLEC: Competitive Local Exchange Carrier

CLP: Competitive Local Provider = NC CLEC

CM: Change Management

CMDS: Centralized Message Distribution System - Telcordia administered national system used to transfer specially formatted messages among companies.

COFFI: Central Office Feature File Interface - Provides information about USOCs and class of service. COFFI is a part of DOE/ SONGS. It indicates all services available to a customer.

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

CRSACCTS: CRIS software contract for CSR information

CRSG: Complex Resale Support Group

C-SOTS: CLEC Service Order Tracking System

CSR: Customer Service Record

CTTG: Common Transport Trunk Group - Final trunk groups between BellSouth & Independent end offices and the BellSouth access tandems.

D

DA: Directory Assistance

DESIGN: Design Service is defined as any Special or Plain Old Telephone Service Order which requires BellSouth Design Engineering Activities.

DISPOSITION & CAUSE: Types of trouble conditions, e.g. No Trouble Found, Central Office Equipment, Customer Premises Equipment, etc.

DLETH: Display Lengthy Trouble History - A history report that gives all activity on a line record for trouble reports in LMOS.

DLR: Detail Line Record - All the basic information maintained on a line record in LMOS, e.g. name, address, facilities, features etc.

DS-0: The worldwide standard speed for one digital voice signal (64000 bps).

DS-1: 24 DS-0s (1.544Mb/sec., i.e. carrier systems)

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

DSAP: DOE (Direct Order Entry) Support Application - The BellSouth Operations System which assists a Service Representative or similar carrier agent in negotiating service provisioning commitments for non-designed services and Unbundled Network Elements.

DSAPDDI: DSAP software contract for schedule information.

DSL: Digital Subscriber Line

DUI: Database Update Information

E

E911: Provides callers access to the applicable emergency services bureau by dialing a 3-digit universal telephone number.

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

ESSX: BellSouth Centrex Service

F

Fatal Reject: The number of LSRs that were electronically rejected from LEO, which checks to see of the LSR has all the required fields correctly populated.

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

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

FX: Foreign Exchange

G

H

HAL: "Hands Off" Assignment Logic - Front end access and error resolution logic used in interfacing BellSouth Operations Systems such as ATLAS, BOCRIS, LMOS, PSIMS, RSAG and SOCS.

HALCRIS: HAL software contract for CSR information

HDSL: High Density Subscriber Loop/Line

I

ILEC: Incumbent Local Exchange Company

INP: Interim Number Portability

ISDN: Integrated Services Digital Network

IPC: Interconnection Purchasing Center

L

LAN: Local Area Network

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

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

Legacy System: Term used to refer to BellSouth Operations Support Systems (see OSS)

LENS: Local Exchange Negotiation System - The BellSouth LAN/web server/OS application developed to provide both preordering and ordering electronic interface functions for CLECs.

LEO: Local Exchange Ordering - A BellSouth system which accepts the output of EDI, applies edit and formatting checks, and reformats the Local Service Requests in BellSouth Service Order format.

LERG: Local Exchange Routing Guide

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

LFACS: Loop Facilities Assessment and Control System

LIDB: Line Information Database

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

LMOS HOST: LMOS host computer

LMOSupd: LMOS updates

LMU: Loop Make-up

LMUS: Loop Make-up Service Inquiry

LNP: Local Number Portability - In the context of this document, the capability for a subscriber to retain his current telephone number as he transfers to a different local service provider.

LOOPS : Transmission paths from the central office to the customer premises.

LRN: Location Routing Number

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

M

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

MARCH: BellSouth Operations System which accepts service orders, interprets the coding contained in the service order image, and constructs the specific switching system Recent Change command messages for input into end office switches.

N

NBR: New Business Request

NC: "No Circuits" - All circuits busy announcement.

NIW: Network Information Warehouse

NMLI: Native Mode LAN Interconnection

NPA: Numbering Plan Area

NXX: The "exchange" portion of a telephone number.

O

OASIS: Obtain Availability Services Information System - A BellSouth front-end processor, which acts as an interface between COFFI and RNS. This system takes the USOCs in COFFI and translates them to English for display in RNS.

OASISBSN: OASIS software contract for feature/service

OASISCAR: OASIS software contract for feature/service

OASISLPC: OASIS software contract for feature/service

OASISMTN: OASIS software contract for feature/service

OASISNET: OASIS software contract for feature/service

OASISOCP: OASIS software contract for feature/service

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

OSPCM: Outside Plant Contract Management System - Provides Scheduling Information.

OSS: Operations Support System - A support system or database which is used to mechanize the flow or performance of work. The term is used to refer to the overall system consisting of hardware complex, computer operating system(s), and application which is used to provide the support functions.

OUT OF SERVICE: Customer has no dial tone and cannot call out.

P

PMAP: Performance Measurement Analysis Platform

PON: Purchase Order Number

POTS: Plain Old Telephone Service

PREDICTOR: The BellSouth Operations system which is used to administer proactive maintenance and rehabilitation activities on outside plant facilities, provide access to selected work groups (e.g. RRC & BRC) to Mechanized Loop Testing and switching system I/O ports, and provide certain information regarding the attributes and capabilities of outside plant facilities.

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

PRI: Primary Rate ISDN

Provisioning: The process and functions by which necessary work is performed to activate a service requested via an LSR or ASR and to initiate the proper billing and accounting functions.

PSIMS: Product/Service Inventory Management System - A BellSouth database Operations System which contains availability information on switching system features and capabilities and on BellSouth service availability. This database is used to verify the availability of a feature or service in an NXX prior to making a commitment to the customer.

PSIMSORB: PSIMS software contract for feature/service.

Q

R

RNS: Regional Negotiation System - An internal BellSouth service order entry system used by BellSouth Consumer Services to input service orders in BellSouth format.

ROS: Regional Ordering System

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

RSAG: Regional Street Address Guide - The BellSouth database, which contains street addresses validated to be accurate with state and local governments.

RSAGADDR: RSAG software contract for address search.

RSAGTN: RSAG software contract for telephone number search.

S

SAC: Service Advocacy Center

SEEM: Self Effectuating Enforcement Mechanism

SOCS: Service Order Control System - The BellSouth Operations System which routes service order images among BellSouth drop points and BellSouth Operations Systems during the service provisioning process.

SOIR: Service Order Interface Record - any change effecting activity to a customer account by service order that impacts 911/E911

SONGS: Service Order Negotiation and Generation System.

T

TAFI: Trouble Analysis Facilitation Interface - The BellSouth Operations System that supports trouble receipt center personnel in taking and handling customer trouble reports.

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

TN: Telephone Number

Total Manual Fallout: The number of LSRs which are entered electronically but require manual entering into a service order generator.

U

UNE: Unbundled Network Element

UCL: Unbundled Copper Link

USOC: Universal Service Order Code

V

W

WATS: Wide Area Telephone Service

WFA: Work Force Administration

WMC: Work Management Center

WTN: Working Telephone Number.

X

Y

Z

Appendix C: 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 Measurements 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 4Q01.

C-2: BellSouth's External Audit Policy

BellSouth currently provides many CLECs with audit rights as a part of their individual interconnection agreements. 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 a comprehensive audit of the current year aggregate level reports for both BellSouth and the CLECs for each of the next five (5) years (2001 - 2005), to be conducted by an independent third party auditor. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. Requested audits include the following specifications:

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

These comprehensive audits are intended to provide the basis for the PSCs and CLECs to determine that the SQM and PMAP produce accurate data that reflects each States Order for performance measurements. Once this has been verified by an initial audit, the BellSouth PMQAP will provide the basis for future audits.

ATTACHMENT 2

Fee Schedule per affected item

LIQUIDATED DAMAGES TABLE FOR TIER-1 MEASURES

PER AFFECTED ITEM						
	Month 1	Month 2	Month3	Month4	Month 5	Month 6
Pre-Ordering	$20	$30	$40	$50	$60	$70
Ordering	$40	$50	$60	$70	$80	$90
Provisioning	$100	$125	$175	$250	$325	$500
Provisioning UNE (Coordinated Customer Conversions)	$400	$450	$500	$550	$650	$800
Maintenance and Repair	$100	$125	$175	$250	$325	$500
Maintenance and Repair UNE	$400	$450	$500	$550	$650	$800
LNP	$150	$250	$500	$600	$700	$800
Billing	$1.00	$1.00	$1.00	$1.00	$1.00	$1.00
Change Management	$1000	$1000	$1000	$1000	$1000	$1000
IC Trunks	$100	$125	$175	$250	$325	$500
Collocation	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000

REMEDY PAYMENTS FOR TIER-2 MEASURES

	Per Affected Item
OSS Pre-Ordering	$20
Ordering	$60
Provisioning	$300
UNE Provisioning (Coordinated Customer Conversions)	$875
Maintenance and Repair	$300
UNE Maintenance and Repair	$875
Billing	$1.00
LNP	$500
IC Trunks	$500
Collocation	$15,000
Change Management	$1,000

ATTACHMENT 3

Calculation Procedures

SEEM REMEDY PROCEDURE

TIER-1 CALCULATION FOR RETAIL ANALOGUES:

1. Calculate the overall test statistic for each ALEC; $z^T_{ALEC\text{-}1}$ (Per Statistical Methodology discussed by Dr. Mulrow)

2. Calculate the balancing critical value($^{C}B_{ALEC\text{-}1}$) that is associated with the alternative hypothesis (for fixed parameters δ, Ψ, or ε)

3. If the overall test statistic is equal to or above the balancing critical value, stop here. That is, if $^{C}B_{ALEC\text{-}1} < z^T_{ALEC\text{-}1}$, stop here. Otherwise, go to step 4.

4. Calculate the Parity Gap by subtracting the value of step 2 from that of step 1. $ABS(z^T_{ALEC\text{-}1} - {}^{C}B_{ALEC\text{-}1})$

5. Calculate the Volume Proportion using a linear distribution with slope of ¼. This can be accomplished by taking the absolute value of the Parity Gap from step 4 divided by 4; $ABS((z^T_{ALEC\text{-}1} - {}^{C}B_{ALEC\text{-}1}) / 4)$. All parity gaps equal or greater to 4 will result in a volume proportion of 100%.

6. Calculate the Affected Volume by multiplying the Volume Proportion from step 5 by the Total Impacted ALEC-$_1$ Volume (I_c) in the negatively affected cell; where the cell value is negative.

7. Calculate the payment to ALEC-1 by multiplying the result of step 6 by the appropriate dollar amount from the fee schedule.

8. Then, ALEC-1 payment = $\text{Affected Volume}_{ALEC1}$ * $$ from Fee Schedule

Example: ALEC-1 Missed Installation Appointments (MIA) for Resale POTS.
Note – the statistical results are only illustrative. They are not a result of a statistical test of this data.

	n_1	N_C	I_c	MIA_I	MIA_C	$z^T_{ALEC\text{-}1}$	C_B	Parity Gap	Volume Proportion	Affected Volume
State	50000	600	96	9%	16%	-1.92	-0.21	1.71	0.4275	
Cell						$z_{ALEC\text{-}1}$				
1		150	17	0.091	0.113	-1.994				8
2		75	8	0.176	0.107	0.734				
3		10	4	0.128	0.400	-2.619				2
4		50	17	0.158	0.340	-2.878				8
5		15	2	0.245	0.133	1.345				
6		200	26	0.156	0.130	0.021				
7		30	7	0.166	0.233	-0.600				3
8		20	3	0.106	0.150	-0.065				2
9		40	9	0.193	0.225	-0.918				4
10		10	3	0.160	0.300	-0.660				2
										29

where n_I = ILEC observations and n_C = ALEC-1 observations
Payout for ALEC-1 is (29 units) * ($100/unit) = $2,900

Example: ALEC-1 Order Completion Interval (OCI) for Resale POTS

	n_I	n_C	I_c	OCI_I	OCI_C	z^T_{ALEC-1}	C_B	Parity Gap	Volume Proportion	Affected Volume
State	50000	600	600	5days	7days	-1.92	-0.21	1.71	0.4275	
Cell						z_{ALEC-1}				
1		150	150	5	7	-1.994				64
2		75	75	5	4	0.734				
3		10	10	2	3.8	-2.619				4
4		50	50	5	7	-2.878				21
5		15	15	4	2.6	1.345				
6		200	200	3.8	2.7	0.021				
7		30	30	6	7.2	-0.600				13
8		20	20	5.5	6	-0.065				9
9		40	40	8	10	-0.918				17
10		10	10	6	7.3	-0.660				4
										133

where n_I = ILEC observations and n_C = ALEC-1 observations

Payout for ALEC-1 is (133 units) * ($100/unit) = $13,300

TIER-2 CALCULATION for RETAIL ANALOGUES:

1. Tier-2 is triggered by three consecutive monthly failures of any Tier 2 Remedy Plan submetric.

2. Therefore, calculate monthly statistical results and affected volumes as outlined in steps 2 through 6 for the ALEC Aggregate performance. Determine average monthly affected volume for the rolling 3 month period.

3. Calculate the payment to State Designated Agency by multiplying average monthly volume by the appropriate dollar amount from the Tier-2 fee schedule.

Therefore, State Designated Agency payment = □Average monthly volume * $$ from Fee Schedule

Example: ALEC-A Missed Installation Appointments (MIA) for Resale POTS

State	n_I	n_C	I_c	MIA_I	MIA_C	z^T_{ALEC-A}	C_B	Parity Gap	Volume Proportion	Affected Volume
Month 1	180000	2100	336	9%	16%	-1.92	-0.21	1.71	0.4275	
Cell						z_{ALEC-A}				
1		500	56	0.091	0.112	-1.994				24
2		300	30	0.176	0.100	0.734				
3		80	27	0.128	0.338	-2.619				12
4		205	60	0.158	0.293	-2.878				26
5		45	4	0.245	0.089	1.345				
6		605	79	0.156	0.131	0.021				
7		80	19	0.166	0.238	-0.600				9
8		40	6	0.106	0.150	-0.065				3
9		165	36	0.193	0.218	-0.918				16
10		80	19	0.160	0.238	-0.660				9
										99

where n_I = ILEC observations and n_C = ALEC-A observations

Assume Months 2 and 3 have the same affected volumes. Payout 99 units * $300/unit = $29,700.

TIER-1 CALCULATION FOR BENCHMARKS

1. For each ALEC, with five or more observations, calculate monthly performance results for the State.

2. ALECs having observations (sample sizes) between 5 and 30 will use Table I below. The only exception will be for Collocation Percent Missed Due Dates.

Table I **Small Sample Size Table**
(95% Confidence)

Sample Size	Equivalent 90% Benchmark	Equivalent 95% Benchmark
5	60.00%	80.00%
6	66.67%	83.33%
7	71.43%	85.71%
8	75.00%	75.00%
9	66.67%	77.78%
10	70.00%	80.00%
11	72.73%	81.82%
12	75.00%	83.33%
13	76.92%	84.62%
14	78.57%	85.71%
15	73.33%	86.67%
16	75.00%	87.50%
17	76.47%	82.35%
18	77.78%	83.33%
19	78.95%	84.21%
20	80.00%	85.00%
21	76.19%	85.71%
22	77.27%	86.36%
23	78.26%	86.96%
24	79.17%	87.50%
25	80.00%	88.00%
26	80.77%	88.46%
27	81.48%	88.89%
28	78.57%	89.29%
29	79.31%	86.21%
30	80.00%	86.67%

3. If the percentage (or equivalent percentage for small samples) meets the benchmark standard, stop here. Otherwise, go to step 4.

4. Determine the Volume Proportion by taking the difference between the benchmark and the actual performance result.

5. Calculate the Affected Volume by multiplying the Volume Proportion from step 4 by the Total Impacted ALEC-$_1$ Volume.

6. Calculate the payment to ALEC-1 by multiplying the result of step 5 by the appropriate dollar amount from the fee schedule.

   ALEC-1 payment = Affected Volume$_{ALEC\text{-}1}$ * $$ from Fee Schedule

   Example: ALEC-1 Percent Missed Due Dates for Collocations

	n_C	Benchmark	MIA_C	Volume Proportion	Affected Volume
State	600	10%	13%	.03	18

Payout for ALEC-1 is (18 units) * ($5000/unit) = $90,000

TIER-1 CALCULATION FOR BENCHMARKS (in the form of a target):

1. For each ALEC with five or more observations calculate monthly performance results for the State.
2. ALECs having observations (sample sizes) between 5 and 30 will use Table I above.
3. Calculate the interval distribution based on the same data set used in step 1.
4. If the 'percent within' (or equivalent percentage for small samples) meets the benchmark standard, stop here. Otherwise, go to step 5.
5. Determine the Volume Proportion by taking the difference between benchmark and the actual performance result.
6. Calculate the Affected Volume by multiplying the Volume Proportion from step 5 by the Total ALEC-1 Volume.
7. Calculate the payment to ALEC-1 by multiplying the result of step 6 by the appropriate dollar amount from the fee schedule.

ALEC-1 payment = Affected $\text{Volume}_{\text{ALEC1}}$ * $$ from Fee Schedule

Example: ALEC-1 Reject Timeliness

	n_C	Benchmark	Reject Timeliness	Volume Proportion	Affected Volume
State	600	95% within 1 hour	93% within 1 hour	.02	12

Payout for ALEC-1 is (12 units) * ($100/unit) = $1,200

TIER-2 CALCULATIONS for BENCHMARKS:

Tier-2 calculations for benchmark measures are the same as the Tier-1 benchmark calculations except the ALEC Aggregate data is evaluated over a three consecutive month period.

STATE OF ALABAMA

ALABAMA PUBLIC SERVICE COMMISSION

MONTGOMERY, ALABAMA

IN RE: PETITION FOR ARBITRATION OF ITC^DELTACOM COMMUNICATIONS, INC., WITH BELLSOUTH TELECOMMUNICATIONS, INC.,

DOCKET NO. 27091

VOLUME I

PROCEEDINGS taken before the Alabama Public Service Commission in the above-referenced matter on January 18, 2000, commencing at 9:50 a.m. in the hearing room of the Alabama Public Service Commission, the RSA Union Building, 100 North Union Street, Room 904, Montgomery, Alabama, before Amy L. Maddox, Certified Shorthand Reporter and Notary Public in and for the State of Alabama at Large.

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are in it.

Q. And, of course, I think you've testified to this before, that DeltaCom did not participate in the Texas proceedings, but obtained this particular document from a consultant in Texas; correct?

A. That's correct.

Q. And, of course, to your knowledge, did BellSouth participate in the proceedings in Texas?

A. I can't understand any reason why they would have, but to the best of my knowledge, no.

Q. Is DeltaCom asking for a separate, different set of performance measurements if there's an industry-wide set of performance measures established?

A. No, not really. In fact, we'd prefer the adoption of an industry-wide set of performance measures, but you have to understand at the time of our -- that we filed this arbitration, the performance measures that BellSouth had in hand were

far from complete. Now, I think BellSouth should be commended at this point. Since we filed in June our arbitration here, the BellSouth performance measures have moved tremendously in terms of moving towards completion. So BellSouth has done a lot of work in recent months to complete those performance measures. I don't know what the status is of them today.

But as I've stated in other states, we would be very willing to look at those performance measures, to adopt them as the performance measures in this interconnection agreement, and we would highly recommend that our guarantees be added to the performance measures. There needs to be some guarantee level. We're not trying to be different or create something unique, but we recognize two things: One, we had to put this out on the table or we wouldn't be taken seriously; two, as Mr. Gentle previously

performance measurements in Attachment 10 just on an interim basis?

A. No, I have not.

Q. And is it possible that there could be significant costs involved in implementing Attachment 10 on an interim basis, only to have this Commission adopt BellSouth's SQMs in a generic proceeding six or seven months down the road?

A. There could be, but once again, I'm really interested in implementing our interconnection agreement and getting what we need in place. Now, I think we've been extremely flexible in terms of accommodating BellSouth in saying, we don't have to have these performance measures as we've laid them out. I don't think we have to lay that in concrete, as I've indicated. You've made -- you, BellSouth, have made great strides in improving and completing the performance measures that were far from complete six, seven months ago when we had to make a

decision to file an arbitration case. So we've been very accommodating there. We're willing to move off that, accept those -- the SQMs, add the guarantees to them, and move forward.

Q. And that's really what this whole issue comes down to, is performance guarantees; correct?

A. It could get to that, yes.

Q. And under your -- under DeltaCom's proposal, I think you mentioned this in your summary, there are three different tiers of performance guarantees or penalties; is that correct?

A. That's correct.

Q. And the first tier involves certain waiver of nonrecurring charges or similar type refunds to DeltaCom; correct?

A. Yes, that is correct.

Q. And the second tier involves a payment of 25,000 dollars to the state if BellSouth fails to meet any performance measurement for two consecutive months or two months

out of a quarter; is that correct?

A. Also correct.

Q. And the third tier, of course, is the 100,000-dollar-payment per day, again to the State of Alabama, if BellSouth fails to meet a single measure five times in a six-month period; correct?

A. Also correct.

Q. If I could, do you have your Attachment 10 in front of you?

A. No, I don't.

Q. It was attached to the petition for arbitration.

A. No, I don't, but I think we have a copy here. We'll have it in a second. Okay.

Q. If I could get you to look at Attachment 10, Mr. Rozycki, page 4, which is the actual specific performance measures.

A. Yes.

Q. One of these measures, Measure 10, deals with percent BellSouth missed due dates due to lack of facilities. Do you see that?

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:	
Petition by ITC^DELTACOM COMMUNICATIONS, INC. for Arbitration of its Interconnection Agreement with BELLSOUTH TELECOMMUNICATIONS, INC. pursuant to the Telecommunications Act of 1996	Docket No. 10854-U

Room 507
47 Trinity Avenue
Atlanta, Georgia

Monday, November 29, 1999

The above-entitled matter came on for hearing pursuant to Notice at 10:04 a.m.

BEFORE:

LAUREN "BUBBA" MCDONALD, Vice Chairman
ROBERT BAKER, Commissioner
DAVID BURGESS, Commissioner

* * *

into an entire explanation of how they came up with their measures and I'm sure, Mr. Rozycki, we'll get to that discussion, but I think I just asked a simple question I'm not sure I got an answer to.

THE WITNESS: Repeat the question and let me --

BY MR. ALEXANDER:

Q Deltacom is asking the Georgia Commission on this issue, 1-A, that it should adopt Deltacom's performance measures, performance guarantees that are set forth in attachment 10 to its petition?

A Originally that's what we've asked. In my rebuttal testimony I've indicated that at this point in the interest of settling this issue, we would be willing to accept the performance measures, the SQMs, of BellSouth so long as they are coupled with the guarantees that we have proposed. I don't want to continue fighting with you over this issue of whether we should have different standards for ITC^Deltacom versus the rest of the industry. I would concede that your performance measures at this point have come a long way since we originally filed our petition, and that's why we are moving in that direction. But, we still hold fast on the notion that performance guarantees need to be in place.

Did I answer you this time?

Q Well, I think you did, and I knew that was in your