

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION
Frankfort, Kentucky**

In the Matter of:)

Investigation Concerning the)

Propriety of InterLATA Services)

by BellSouth Telecommunications,)

Inc., Pursuant to the Telecommunications)

Act of 1996)

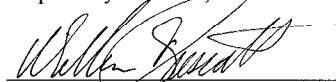
Case No. 2001-105

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC. AND
MCI WORLDCOM COMMUNICATIONS, INC.'S RESPONSE TO THE
COMMISSION'S REQUEST FOR A POST HEARING EXHIBIT REGARDING
PROPOSED MODIFICATIONS TO THE SERVICE QUALITY MEASURES AND
ENFORCEMENT PLAN ADOPTED BY THE GEORGIA PUBLIC SERVICE
COMMISSION**

COMES NOW, AT&T Communications of the South Central States, Inc., in conjunction with MCI WorldCom Communications, Inc., and files this response to the Commission's request for a post hearing exhibit identifying the modifications that should be made to the Service Quality Measurements and Enforcement Plan adopted by the Georgia Public Service Commission.

The post hearing exhibit is comprised of: Exhibit A - CLEC Requested SQM Changes with Attachment I: Additional Measures and Attachment II: Dissagregation, Analogs, and Benchmarks and Exhibit B - Enforcement Measures Recommendation.

Respectfully submitted,



By: William T. Prescott, Esq.
Attorney for AT&T Communications of the
South Central States, Inc.
1200 Peachtree Street, Suite 8100
Atlanta, GA 30309
404 810 8990

EXHIBIT A-CLEC REQUESTED SQM CHANGES

CLEC REQUESTED SQM CHANGES

Metrics from Georgia SQM, with those not in KY Interim plan in italics (<i>CLEC additions in bold italics.</i>)	Business Rule Changes/Additions ¹	Additional Disaggregation Required	Benchmarks (see attached chart for retail analogs when standard is parity.)
<p>OSS/PREORDER</p> <p>OSS-1 Average Response Time and Response Interval (Pre-Ordering/Ordering)</p>	<p>DEFINITIONS: The measurement time should begin when BellSouth or its designated agent receives the query from the CLEC and should end when BellSouth or its designated agent returns a response to the CLEC interface.: "The clock starts on the date/time when the request is received by SWBT, and the clock stops on the date/time when SWBT has completed the transmission of the response to the CLEC."</p> <p>Business Rules: (1) BellSouth should exclude syntactically incorrect queries from the measure. The query type measurements should show how long it takes to return valid query information that is useful to the CLEC. Responses to invalid queries could come more quickly than a response to a valid query, thus diluting the results in terms of how quickly CLECs receive the information sought through a syntactically correct query. (2) BellSouth should not be allowed to drag its feet in measuring new query types and new interfaces. Its business rules should state that any new queries and interfaces will be added to the reporting dimensions within six to eight weeks after they go into production. BellSouth will be well aware of a new query or interface coming on line long before that interface or query type goes into production for CLECs, so the timeline proposed is more than generous.</p>	<p>BellSouth Plus Report: Failed Queries (those generating an error message that can be used to distinguish from other queries)</p> <p>Percent Time Outs</p> <p>Report for each query type as employed by CLEC Interface Type (TAG, LENS) Add EDI interface as queries are built to it</p> <p>NOTE: Florida required BellSouth to exclude error messages, which may be returned quickly but be of no use to the CLECs, from each query type so the timing was not skewed. But this action does not go far enough.</p> <p>The percentage of queries receiving error messages and timing out should be captured for preorder and ordering systems. KPMG's August 10, 2001 Observation 104 noted that it received "numerous system errors while processing LSRs through LENS, which interrupt the creation of an order and often require the user to start the transaction from the beginning. These errors are</p>	<p>CLEC: Parity</p> <p>GA: Parity + 2 sec/</p> <p>FL: Parity + 2 sec.</p>

¹ CLEC business rules contained in KK-C.

CLEC REQUESTED SQM CHANGES

		<p>received on an intermittent basis and do not consistently match system outage notices posted on BellSouth" web site. The majority of these errors received are in the form of java scripts with a LENS message stating, "Error Processing Request. Please contact Electronic Communications Support (0065)." BellSouth should be able to program to capture these and other error messages. Verizon-New York reports on error messages and percent time outs, with the latter having a standard of 0.33%.</p>	
<p>OSS-2 Interface Availability (Pre-Ordering/Ordering)</p>	<p>Data Retained: BellSouth should be required to post its own scheduled hours of OSS availability on its web-site as it currently does for CLEC OSS availability. Parity of scheduled availability cannot be determined without this information. If CLECs do not know the starting point of this measure, the usefulness of the % schedule met is limited. BST also must not do system maintenance more often in CLEC prime operational hours: 5 to 9 p.m. versus its own prime hours: 9 to 5 p.m. The Florida Commission agreed with its staff that systems maintenance should not be scheduled between prime time hours of 8 a.m. to 9 p.m. Monday through Friday.</p> <p><u>Business Rules:</u> BellSouth may not exclude partial outages if any part of the route from CLEC interface to backend system is down the time other parts of the route are up is irrelevant and should be excluded from the denominator in the calculation.</p>	<p>BellSouth plus</p> <ol style="list-style-type: none"> 1. LNP Gateway 2. XDSL Gateway <p>(CLECs assume that entire route of middleware and backend systems accessed through TAG, LENS and EDI interfaces are covered by system availability metric. If one leg on that route is down, the whole route is considered down)</p>	<p>CLEC: 99.5%</p> <p>GA: Same</p> <p>FL: Same</p> <p>Each interface should be measured separately in SEEM, otherwise the total uptime for all interfaces, even those a CLEC does not use, can mask less than 99.5% availability on the CLEC's chosen interface.</p>
<p>OSS-3 Interface Availability Maintenance and Repair</p>	<p>Data Retention: BellSouth should be required to post its own scheduled hours of OSS availability on its web-site as it currently does for CLEC OSS availability. Parity of scheduled availability cannot be determined</p>	<p>(CLECs assume that entire route of middleware and backend systems accessed through TAG,</p>	<p>CLEC: 99.5%</p> <p>GA: Same</p>

CLEC REQUESTED SQM CHANGES

	without this information. Without such understanding of the starting point of this measure, the usefulness of the % schedule met is limited. BST also must not do system maintenance more often in CLEC prime operational hours: 5 to 9 p.m. versus its own prime hours: 9 to 5 p.m. The Florida PSC agreed.	LENS and EDI interfaces are covered by system availability metric. If one leg on that route is down, the whole route is considered down.)	FL: Same
OSS-4 Response Interval Maintenance and Repair	See start and stop definitions proposed for OSS-1.	BellSouth Plus: Create (or confirm logging of) a Maintenance Report; Obtain Status; Obtain Test Results; Cancel Request; Rejected or Failed Queries (regardless of type); Clearance Notification; Closure Notification By Interface Type for each query: TAFI, ECTA	CLEC: Parity GA: Parity + 2 sec. FL: Parity + 2 seconds.
PO-1 Loop Make Up Response (Manual)	No change.	Same as BellSouth	CLEC: 95% in 72 hours. GA: 95% in 3 business days. FL: 95% in 3 business days. BST's proposed benchmark of 3 business days is more lenient than the CLEC proposed 72 hour interval.
PO-2 Loop Make Up Response (Electronic)	BellSouth should be required to provide this information (and meet this standard) via EDI as well as TAG.	Same as BellSouth but for LENS and EDI.	CLEC: 95% in 1 minute. GA: Initially 95% in 5 minutes; Moving to 95% in 1 minute Six months after Production. FL: 95% in 1

CLEC REQUESTED SQM CHANGES

			minute
<i>OSS 102 Percent Software Certification Failures</i>	See CLEC business rules.	All weighted test deck failures aggregated together	<p>CLEC: No more Than 0.1% of test deck transactions resulting in CLEC problems</p> <p>GA: NA</p> <p>FL: NA</p>
<i>OSS 103 Software Problem Resolution Timeliness</i>	See CLEC business rules.	Problems with Work-Arounds; Problems without Work- Arounds	<p>CLEC: No Work Around = 100% in 24 hours.</p> <p>GA: NA</p> <p>FL: NA</p>
<i>OSS 104 Software Problem Resolution Delay Hours/Days</i>	See CLEC business rules.	Problems with Work-Arounds; Problems without Work- Arounds	<p>CLEC: Parity with affiliate or 100% in 48 hours NWA, and 100% in 5 calendar days with work a round.</p> <p>GA: NA</p> <p>FL: NA</p>
<i>MI Percent Response Commitments Met on Time – Help Desk</i>	See business rules Attachment I, as revised for GA six-month review.	Each Ordering/Provisioning /Systems Help Desk	<p>CLEC: 100% Response in 24 Hours. PreOrder/Order Impacting: 95% in 24 hours Other PreOrder/ Ordering requests: 3 business days.</p> <p>GA:NA</p> <p>FL: NA</p> <p>VZ-NY has Similar metric for missing notifiers with benchmark of 95% cleared in 3</p>

CLEC REQUESTED SQM CHANGES

			days.
ORDERING			
O-1 Acknowledgement Message Timeliness	The following BellSouth business rule needs to be clarified: "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." Obtaining individual results is vital to CLECs. This issue is especially critical as this measure is a proposed Tier 1 measure in BellSouth's remedy plan.	Same as BellSouth	<p>CLEC: 98% returned in 15 minutes.</p> <p>GA: EDI: 90% in 30 minutes. TAG: 95% in 30 minutes.</p> <p>FL: 95% in 30 Minutes.</p>
O-2 Acknowledgement Message Completeness	See above.	Same as BST.	<p>CLEC: 100%</p> <p>GA: Same</p> <p>FL: Same</p>
O-3 Percent Flow Through (Summary)	<p>Change Metric to Duel Focus: Total flow-through and flow-through for orders designed to flow through should be measured separately. The first measure is needed if there are exceptions (pending orders, supps, orders in treatment for non-payment) to what types of orders CLECs are told should flow through. These exceptions were gradually eliminated in New York according to a schedule the PSC negotiated before endorsing Verizon's 271 application. The total flow through metrics ensures that BellSouth would be responsive to CLECs requests that more types of orders be designed to flow through. This benchmark should gradually increase over time.</p> <p>Exclusions: BellSouth's SQM should not exclude orders that fall to manual, through no fault of the CLEC, from the metric. It may measure whether the orders it has designed to flow through actually do, but it should also show the whole story on what orders have not yet been designed to flow through. The purpose of this measure should be to measure the percent flow-through capability of</p>	Same But: Instead of (Aggregated) UNE: 4. UNE-Platform 5. UNE Loops	<p>CLEC: 98% Achieved or Designed Flow Through (as BST metric currently is defined).</p> <p>Add Total Flow Through with/out Fall out exclusions: Resale Res = 95% Resale Bus = 90% UNE = 85% LNP = 85%</p> <p>GA: Achieved Flow Through: Resale Res = 95% Resale Bus = 90% UNE = 85% LNP = 85%</p>

CLEC REQUESTED SQM CHANGES

	<p>BellSouth's ordering systems. CLECs cannot improve the flow-through of error free orders, only BellSouth can. Therefore, it should be held accountable for its decision not to provide flow-through. Further, BellSouth is obligated to provide parity service. As it has provided no evidence that such orders fall out for manual processing for its retail operation, it should not be allowed to exclude such orders from its flow-through calculation for CLECs.</p> <p>In addition to the current level of discrimination, another consequence of allowing this exclusion is that BellSouth has no incentive, perhaps even a disincentive to improve its performance. Yet it is clear that the lack of flow-through causes additional delays, errors and costs. For example, FOC intervals are much longer for partially mechanized orders. It is also undisputed that having to re-key an order delays it and re-keying or otherwise manually handling an order increases the risk of error, which either causes the order to reject, creating more delay, or perhaps even to be provisioned incorrectly. CLECs request that the Commission reject this unjustified and discriminatory exclusion. At a minimum, the Commission should establish a timely sunset provision² on this exclusion to cause BellSouth to improve its flow-through performance. Fall out from errors occurring in SOCS should be included in the metrics, as should all fall out resulting from BST system issues. Additionally, BellSouth should provide this report for LNP LSRs.</p>		<p>FL: Same as GA.</p> <p>Benchmark: BellSouth's benchmarks may be appropriate if total flow through is being measured, but if only orders designed to flow through as BellSouth currently proposes are counted then the benchmark should be a strict 98%. CLECs propose that both total and achieved/designed flow through performance should be measured.</p>
<p>O-4 Percent Flow Through (Detail)</p>	<p>See above.</p>	<p>Same as BST but. Instead of (Aggregated) UNE: 4. UNE-Platform 5. UNE Loops</p>	<p>CLEC: See above.</p> <p>GA: See above.</p> <p>FL: See above.</p>
<p>O-5 Percent Flow Through Error Analysis</p>	<p>No change.</p>	<p>This is supporting data, not a performance report</p>	<p>NA</p>
<p>O-6 CLEC LSR Information</p>	<p>No change.</p>	<p>This is raw data not a performance report</p>	<p>NA</p>
<p>O-7 Percent Rejected</p>	<p><u>Business Rules:</u> BellSouth must identify all</p>	<p>Same as BST but</p>	<p>CLEC:</p>

CLEC REQUESTED SQM CHANGES

<p>Service Request</p>	<p>errors in orders in parallel, rather than catching and sending back each error one at a time. BellSouth's current serial process of rejecting orders extends the time for CLECs finally getting an order accepted. With BellSouth's long intervals for partially mechanized orders, repeated rejects can easily push out the due date for an order beyond the customer's toleration level. With numerous business rule changes and system update changes to learn, CLECs are apt to make mistakes. For them to quickly learn new rules a rapid rejection response catching all errors at once can speed up the CLEC's learning to avoid such errors in the future.</p>	<p>instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL and UCL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL-Non-Design 4. Other 2 wire Digital loops 5. Other 4 wire Digital loops. 6. Line Splitting <p>Replace UNE Digital Loop > DS1 with:</p> <ol style="list-style-type: none"> 7. UNE DS1 8. UNE DS3 and higher <p>Replace UNE ISDN with:</p> <ol style="list-style-type: none"> 9. UNE ISDN PRI 10. UNE ISDN BRI <p>Replace UNE Combos</p> <p>Other with:</p> <ol style="list-style-type: none"> 11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration <p>Replace Resale ISDN:</p> <ol style="list-style-type: none"> 13. Resale ISDN PRI 14. Resale ISDN BRI 15. Resale DID trunks: 	<p>Diagnostic</p> <p>GA: Same</p> <p>FL: Same.</p>
<p>O-8 Reject Interval</p>	<p><u>Business Rules:</u> BellSouth's business rules and formula should be changed to require BellSouth to calculate this measure as follows: the measured interval should end upon delivery by BellSouth or its agent of a response to the CLEC interface. BellSouth should measure the entire interval up to the point that it returns the rejected LSR to the CLEC. BellSouth should be accountable for the time in which the rejection is in its possession. The Texas plan states as the end of its interval "the time the reject notice is <i>provided to EDI</i> (or LEX) and is <i>available</i> to the CLEC."</p> <p>The rules should specify that received by BellSouth also includes any third-party vendor, such a Harbinger/Petegrine, that BellSouth contracts with to receive orders from CLECs. CLECs are responsible for any</p>	<p>Same as BST but instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting <p>Replace UNE Digital Loop > DS1 with:</p> <ol style="list-style-type: none"> 7. UNE DS1 8. UNE DS3 and higher 	<p>CLEC:</p> <p>95% within 1 hour fully mechanized. 5 hours partially mechanized. 24 hours non-mechanized. 48 hours for trunks.</p> <p>GA:</p> <p>97% in 1 hour for fully mechanized; 85% in 18 for 3 months and 10 hours in six months for partially</p>

CLEC REQUESTED SQM CHANGES

	<p>time additions by third parties they have hired.</p> <p>BellSouth's SQM indicates that it uses the date/time stamp in LEO for mechanized orders. CLECs request that it be required to use the date/time stamp from the interface (LENs/TAG/EDD) as it does for the beginning of the interval. There is no justification for stopping short of delivery to the CLEC. For non-mechanized orders, BellSouth indicates that it is using LON, its order tracking system for non-mechanized orders. Again, BellSouth provides no justification and the CLECs request that BellSouth be required to use the actual stop time from the fax server as it uses the date/time stamp from the fax for the receipt of the order.</p> <p>Further, when a CLEC uses multiple OSS interfaces the reject interval should be measured for each one. Different interfaces can produce different rejection intervals, and disaggregated monitoring of such differences is needed.</p>	<p>Replace UNE ISDN with:</p> <p>9. UNE ISDN PRI 10. UNE ISDN BRI</p> <p>Replace UNE Combos</p> <p>Other with:</p> <p>11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration</p> <p>Replace Resale ISDN:</p> <p>13. Resale ISDN PRI 14. Resale ISDN BRI 15. Resale DID trunks</p>	<p>mechanized 85% in 24 hours non-mechanized. 85% in 4 days for trunks.</p> <p>FL: 97% in 1 hour for fully mechanized; 95% in 10 hours for partially mechanized 95% in 24 hours non-mechanized. 95% in 36 hours for trunks.</p> <p>Standard: BellSouth's intervals for partially mechanized orders are too long. Such rejections should be received in 5 hours not 48. Totally manual orders may have a longer, 24 hour, interval. These intervals should include trunks. BellSouth's proposed trunk rejection intervals— 4 days—are too long to wait to learn that its order had not even been initiated yet.</p>
<p>O-9 FOC Timeliness</p>	<p>Business Rules: BellSouth's business rules and formula should be changed to require BellSouth to calculate this measure as follows: The measured interval should end upon delivery by BellSouth or its agent of a response to the CLEC interface. BellSouth should be accountable for the time in which the FOC is in its or a third party it has employed to handle orders' possession and should be required to measure its performance as described in the Texas performance measures plan, which states "the end date and</p>	<p>Same But: Instead of UNE xDSL loop:</p> <ol style="list-style-type: none"> 1. <u>Unbundled UNE-derived ADSL Loop</u> 2. <u>Unbundled UNE-derived HDSL loop</u> 3. <u>UCL Loops Long and Short</u> 4. <u>Other 2 wire xDSL loops</u> 	<p>CLEC: 97% in 1 hour for fully mechanized; 95% in 10 hours for partially mechanized 95% in 24 hours non-mechanized. 95% in 36 hours for outbound trunks; 95% in 10 days</p>

CLEC REQUESTED SQM CHANGES

	<p>time is recorded by (both LEX and) EDI and reflect the actual date and time the FOC is available to the CLEC.”</p> <p>The rules should specify that received by BellSouth also includes any third-party vendor, such a Harbinger/Peregrine, that BellSouth contracts with to receive orders from CLECs. CLECs are responsible for any time additions by third parties they have hired.</p> <p>BellSouth’s SQM indicates that it uses the date/time stamp in LEO for mechanized orders. CLECs request that it be required to use the date/time stamp from the interface (LENS/TAG/EDI) as it does for the beginning of the interval. There is no justification for stopping short of delivery to the CLEC. For non-mechanized orders, BellSouth indicates that it is using LON, its order tracking system for non-mechanized orders. Again, BellSouth provides no justification and the CLECs request that BellSouth be required to use the actual stop time from the fax server as it uses the date/time stamp from the fax for the receipt of the order.</p> <p>Also, if CLECs order inbound BellSouth to CLEC trunks through ASRs, the confirmation of those ASRs should be included in this metric. CLECs also have proposed a separate measure to capture how quickly BellSouth responds to inbound trunk requests whether made through ASRs to which BellSouth sends a confirmation or by a Trunk Group Service Request to which BellSouth responds by sending an ASR. Either as part of the confirmation or a separate metric, measurement of the time it takes BellSouth to respond is critical to monitor. CLECs often wait a long time for ILECs to send the ASRs when capacity is inadequate to carry calls from ILEC customers to CLEC customers. CLECs seek to have adequate inbound trunk capacity in place before adding new customers that would cause blocking for new and existing customers. Current trunking measurements do not capture this missing response time on inbound trunks.</p> <p>BellSouth also should confirm facilities</p>	<ol style="list-style-type: none"> 5. <u>Other 4 wire xDSL loops.</u> 6. <u>Line Splitting</u> <u>Replace UNE Digital Loop > DS1 with:</u> 7. <u>UNE DS1</u> 8. <u>UNE DS3 and higher</u> <u>Replace UNE ISDN with:</u> 9. <u>UNE ISDN PRI</u> 10. <u>UNE ISDN BRI</u> <u>Replace UNE Combos</u> <u>Other with:</u> 11. <u>Enhanced Extended Loop (Dispatch)</u> 12. <u>Special Access to EELs Migration</u> <u>Replace Resale ISDN:</u> 13. <u>Resale ISDN PRI</u> 14. <u>Resale ISDN BRI</u> 15. <u>Resale DID trunks</u> 	<p>for inbound BST-to-CLEC Trunks.</p> <p>GA: 95% in 3 hours for fully mechanized; 85% in 18 hours for 3 months, 10 hours in 6 months. 85% in 10 hours, 85% in 36 hours in six months, 95% in 7 days for trunks.</p> <p>FL: 95% in 3 hours for fully mechanized; 95% in 10 hours for partially mechanized. 95% in 24 hours in six months, 95% in 48 hours for trunks.</p> <p>Standards: Most other ILECs have Fully Mechanized Intervals of 1 hour; VZ is longest w/ 2 and SBC-PacBell Shortest with 20 minutes average.</p> <p>5 hour intervals for fully mechanized is what SBC uses In SWBT And AIT</p>
--	--	---	---

CLEC REQUESTED SQM CHANGES

	<p>availability for all orders, not just trunks, before issuing a confirmation. If CLECs cannot depend on the due date given them then confirmations are useless. Too often in BellSouth territory CLECs receive confirmations immediately followed by notice that the order is being held for facilities. Facilities checks should be a standard requirement for all orders.</p> <p>BellSouth should be required to do electronic facilities checks to ensure that the due dates delivered in FOCs can be relied upon. The staff recommendation adopted by the Florida commission agreed. Fully Mechanized</p>		<p>Regions.</p>
<p>O-10 Service Inquiry with LSR/FOC Response</p>	<p>No change.</p>	<p>Same but: Replace xDSL with:</p> <ol style="list-style-type: none"> 2. Unbundled UNE-derived ADSL Loop 3. Unbundled UNE-derived HDSL loop 1. UCL Loops Long and Short 2. Other 2 wire xDSL loops 3. Other 4 wire xDSL loops. 	<p>CLEC: 95% in 3 days at most or combination of FOC/Manual Loop Qual Intervals..</p> <p>GA: 95% in 5 Business days.</p> <p>FL: 95% in 5 Business days.</p>
<p>O-11 FOC/Reject Completeness</p>	<p>BellSouth should include partially and non-mechanized orders.</p>	<p>Same But instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting Replace UNE Digital Loop > DS1 with: 7. UNE DS1 8. UNE DS3 and higher <p>Replace UNE ISDN with:</p> <ol style="list-style-type: none"> 9. UNE ISDN PRI 	<p>CLEC: 100%</p> <p>GA: 95%</p> <p>FL: 95%</p>

CLEC REQUESTED SQM CHANGES

		<p>10. UNE ISDN BRI Replace UNE Combos Other with: 11. Enhanced Extended Loop (Dispatch) 16. Special Access to EELs Migration Replace Resale ISDN: 17. Resale ISDN PRI 18. Resale ISDN BRI 19. Resale DID trunks</p>	
O-12 Speed of Answer in Ordering Center	No change.	Same (unless BST has other preorder, order, system help desks serving NC carriers)	<p>CLEC: 95% in 20 seconds and 100% in 30 seconds</p> <p>GA: Parity with Retail.</p> <p>FL: Parity with Retail.</p> <p>This metric should not be diagnostic.</p>
<i>OP-113 Call Abandonment Rate</i>	See CLEC business rules.	CLEC Local Carrier Service Center (and any other help desk service centers)	<p>CLEC: Less than 1% Abandoned.</p> <p>GA: NA</p> <p>FL: NA</p>
O-13 LNP- Percent Rejected	No change.	Same.	<p>CLEC: Diagnostic</p> <p>GA: Diagnostic</p> <p>FL: Diagnostic</p>
O-14 LNP – Reject Interval Distribution and Average Reject Interval	No change.	Same	<p>CLEC: 97% in 1 hour for fully mechanized; 95% in 10 hours for partially mechanized 95% in 24 hours non-mechanized.</p> <p>GA: Assumed Same as other Reject metric.</p> <p>FL: 97% in 1 hour</p>

CLEC REQUESTED SQM CHANGES

			for fully mechanized; 95% in 10 hours for partially mechanized. 95% in 24 hours in six months,
O-15 LNP – FOC Timeliness Distribution/FOC Average Interval	No change.	Same	CLEC: 95% in 1 hour for fully mechanized; 95% in 5 hours for partially mechanized 95% in 24 hours non-mechanized. GA: Assumed same as other FOC metric. FL: 95% in 3 hours for fully mechanized; 95% in 10 hours for partially mechanized. 95% in 24 hours in six months,
<i>OP-114 Mean Time to Provide Response to Request for BST-to-CLEC trunks</i>	See CLEC business rules.	Inbound Trunks requested with TGSR/ ASR(BST ACNA)	CLEC: Diagnostic. GA: NA FL: NA
<i>OP-115 Percent Responses to Requests for BST-to-CLEC Trunks Provided in 7 Days</i>	See CLEC business rules.	Inbound Trunks requested with TGSR/ ASR (BST ACNA)	CLEC: 95% GA: NA FL: NA
<i>OP-116 Percent Negative Responses for BST-to-</i>	See CLEC business rules.	Inbound Trunks requested with	CLEC: Diagnostic

CLEC REQUESTED SQM CHANGES

<i>CLEC trunks</i>		TGSR/ASR (BST ACNA)	<p>GA: NA</p> <p>FL: NA</p>
PROVISIONING:			
P-1 Mean Held Order Interval & Distribution	<p>Exclusions: BellSouth must not be allowed to exclude cancelled orders from these metrics. Often this will make performance look better than it is as CLECs cancel orders when it appears that BellSouth will not have the facilities to fill those orders for months. Further, customers may request cancellations themselves if the CLEC cannot tell them how long they have to wait for their order to be completed. If cancelled orders are excluded, the metric will not show the real story of how often CLEC orders are held for facilities or other reasons.</p>	<p>Same But: Instead of UNE xDSL loop:</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting Replace UNE Digital Loop > DS1 with: <ol style="list-style-type: none"> 7. UNE DS1 8. UNE DS3 and higher Replace UNE ISDN with: <ol style="list-style-type: none"> 9. UNE ISDN PRI 10. UNE ISDN BRI Replace UNE Combos Other with: <ol style="list-style-type: none"> 11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration Replace Resale ISDN: <ol style="list-style-type: none"> 13. Resale ISDN PRI 14. Resale ISDN BRI 15. Add: Resold DID Trunks 16. Inbound BST-to-CLEC trunks. <p>3 geographic disaggregations (very competitive, somewhat competitive, little or no competition.)</p>	<p>CLEC: Parity</p> <p>GA: Parity (different analogs in a few cases).</p> <p>FL: (different analogs in a few cases.)</p>
P-2 Average Jeopardy	Exclusions: Cancelled orders should not be	See above. Plus	CLEC:

CLEC REQUESTED SQM CHANGES

<p>Notice Interval & Percentage of Orders Given Jeopardy Notice</p>	<p>excluded from the measure. CLECs need to see all the orders receiving jeopardies, particularly those that may lead to a cancellation if the delivery date is going to be missed.</p> <p>BellSouth should be required to remove its exclusion of orders submitted to BellSouth through non-mechanized methods. The Commission should not allow BellSouth to discriminate against CLECs who place orders via non-mechanized means. Information regarding jeopardy situations for non-mechanized orders is just as critical to the CLEC and its customers as it is for mechanized orders. Further, in some cases, such as xDSL services and enhanced extended loops (EELs), CLECs have no choice but to use non-mechanized ordering. Finally, BellSouth provides this information for other status measures such as FOCs and rejection notices. The Commission should require BellSouth to provide jeopardy notices, regardless of the means of ordering, and to report its performance accordingly.</p> <p><u>Business Rules:</u> The elapsed time should continue through weekends and holidays to capture the full length of the notice interval.</p> <p>CLECs need to have an equivalent opportunity to plan with customers for situations where an order appears to be in jeopardy as does BellSouth. Therefore, if any BellSouth representative can check on the status of the order, then CLECs need access to that same information sent through electronic or manual notices as requested.</p> <p><u>Calculation:</u> The calculation should be based on the orders placed in jeopardy not just those orders sent jeopardy notices. To calculate the metric as proposed by BellSouth would understate any problem in CLECs not receiving notices on orders that are going to be missed.</p>	<p>Projects 3 geographic areas.</p>	<p>95% in 48 hours & Parity with Retail .</p> <p>GA: 95% in 48 hours and Parity/some different analogs</p> <p>FL: 95% in 48 hours and parity with some different analogs.</p>
<p>P-3 Percent Missed Installation Appointments</p>	<p><u>Business Rules:</u> Disconnect and Firm orders should be disaggregated and reported separately, rather than be excluded as BellSouth proposes. CLECs need to see that their requests to disconnect customers from service are timely as well. This will help</p>	<p>Sec above. Plus Projects 3 geographic areas</p>	<p>CLEC: See attached list, Some parity And some Benchmarks.</p>

CLEC REQUESTED SQM CHANGES

	<p>avoid billing disputes with the terminated customer.</p> <p>This measure should be changed to include time, when time specific appointments are ordered by the CLEC. This measure should evaluate the level of service CLECs are paying for and to which BST is committing, i.e. if the appointment is time specific, the measurement should be time specific. The end time for xDSL orders should include successful continuity testing with the CLEC, particularly if the CLECs' proposed measure on acceptance testing is not adopted.</p> <p>For CLECs, the interval should end with the issuance of the completion notice. This is when the CLEC knows that the order is complete and fulfillment information can be sent to the customer and billing started. For BellSouth, the completion time is the time entered into BellSouth's OSS Systems or any other database from which representatives can obtain completion information.</p> <p>BellSouth should not exclude orders cancelled after the due date is missed from its metric. It is highly likely that the cancellation was due to the appointment miss. It also should measure the interval to when the order finally completes, not just the first due date, except it may end the interval on the second (third etc.) due date if that was missed because of verified Customer Not Ready situation.</p>		<p>GA: Parity w/ some Different analogs.</p> <p>FL: Parity with Some different Analogs.</p>
<p>P-4 Average Completion Interval (OCI) & Order Completion Interval Distribution</p>	<p>Business Rules: Disconnect and Firm as well as expedite orders should be disaggregated and reported separately, rather than be excluded as BellSouth proposes. These usually are very short intervals that can skew total results, but CLECs need to know the speed at which disconnect and expedite orders are being met.</p> <p>BellSouth should be required to modify its business rules and calculation to reflect the appropriate interval. The appropriate starting point for this measure is when BellSouth receives a valid LSR and the appropriate ending point is when a completion notice is sent to the CLEC. Both the New York and Texas performance measures plans begins this interval with the date that a valid service request is received, not when the order is</p>	<p>See above. Plus Projects (Break into Volume Category for hot cuts and Dispatch, Non-Dispatch, Software Change)</p>	<p>CLEC: See benchmark Analog chart.</p> <p>GA: Parity w/ some Different analogs</p> <p>FL: Parity w/ some Different analogs</p> <p>BellSouth's proposed intervals for xDSL with and without conditioning are too long. Interval for conditioning should be no</p>

CLEC REQUESTED SQM CHANGES

	<p>entered into the SOC system as proposed by BellSouth. This would eliminate what could be considerable time from the interval, particularly for non-flow through orders. The FCC objected to this aberrant way BST measures average completion intervals in denying BST's South Carolina and Louisiana II 271 applications...</p>		<p>more than 5 days.</p>
<p>P-5 Average Completion Notice Interval</p>	<p>Exclusions: BellSouth should be required to remove its exclusion of non-mechanized orders. The Commission should not allow BellSouth to discriminate against CLECs who place orders via non-mechanized means. Information regarding completion of service orders for non-mechanized orders is just as critical to the CLEC and its customers as it is for mechanized orders. Further, in some cases, for example, xDSL services and enhanced extended loops (EELs), CLECs have no choice but to use non-mechanized ordering. Finally, BellSouth provides this information for other status measures such as confirmation and rejection notices. The Commission should require BellSouth to provide completion notices, regardless of the means of ordering, and to report its performance accordingly.</p> <p>Disconnections and Firm orders should be included in the measurement but reported separately to track performance,</p> <p>BellSouth should be required to modify its business rules and calculation formula to indicate the measured interval ends upon delivery by BellSouth of a notice of completion to the CLEC interface (LENS, EDI, or TAG) or, if manual, the date/time stamp from the fax machine or server. BellSouth should be accountable for the time in which the completion information is in its possession.</p> <p>BellSouth's current business rules have the ambiguous statement that "the end time is the time stamp the notice was submitted to the CLEC/BST system. CLECs request that the exact CLEC (not BST) system be identified as described above, so that, as in the Texas plan, the end interval measured is "the actual time (LEX) or <i>EDI received</i> the (SOC) notification and it is <i>available</i> to the client."</p>	<p>See above. Plus Projects</p>	<p>CLEC: Parity with Clearly defined (notice part) Retail analog Or no more than 1.5 hours.</p> <p>GA: Parity w/ some Different analogs</p> <p>FL: Parity w/ some Different analogs Benchmark: Completion notices need to be delivered promptly after the actual physical work is completed so CLECs know when they own new customers and must respond to their needs. If the retail analog selected operates at the interval stated by BellSouth in collaboratives (an hour to an hour and a half) that is acceptable but most completion notices need to be delivered at least one hour after work completion</p>

CLEC REQUESTED SQM CHANGES

<p>OP-121 Percent Billing Completion Notices Sent Within Two Days of Work Completion</p>	<p>BST has refused to provide completion notices over EDI. Even though VZ provides such notices, it refuses to do so unless the Ordering and Billing Forum, but this is not an option. In the alternative, BST should design a metric that measures how quickly it clears orders that error out of its billing system for retail and CLEC customers, and report the percent of such errors. Currently, if a service order (LSR) is submitted and it doesn't match with what is in the CRIS database, the LSR will fall into a "hold file" for manual work. This will cause the customer to get BST branding for OS/DA and may result in the customer continuing to be billed by BST. This could mean that the customer would be doubled billed. Most importantly, a CLEC will not receive usage data and will, therefore, not be able to bill these customers. CLECs may also be unable to open trouble tickets for these customers electronically.</p>	<p>See above Plus Projects</p>	<p>CLEC: 95% in 2 days. (or parity in percent and speed clearing errors inclosing to billing, if notice will not be provided.)</p> <p>GA: NA</p> <p>FL: NA</p> <p>VZ-NY has SOP to billing Completion in 3 days metric.</p>
<p>P-6 Percent Completions/Attempts without Notice or <24 Hours Notice</p>	<p>See CLEC Business rules.</p>	<ol style="list-style-type: none"> 1. UNE loop-hot cuts 2. UNE 2 wire xDSL 3. UNE 4 wire xDSLUNE-P-dispatch 	<p>CLEC: No more than 2%.</p> <p>GA: Diagnostic.</p> <p>FL: Diagnostic.</p>
<p>P-7 CCC Interval</p>			<p>CLEC: See below</p>
<p>P-7a CCC Hot Cut % Within Interval and Average Interval (CLEC on time metric includes OP-106 early and OP-107 late cuts)</p>	<p>Exclusions: Cancelled orders should be included to capture all the hot cut activity (even those attempts that prompt the customer to cancel the order) in the metric.</p> <p>Business Rules: The CLECs request that this measurement be modified to include the entire hot cut interval or replaced with the early and late cuts measures requested by the CLECs in my direct testimony. It is important that not only the start time of the cut, but the entire interval, including acceptance testing with the CLEC be included in this measure. The loop should not be considered delivered until BellSouth and the CLEC have checked whether electrical continuity exists. Customers will not tolerate timely delivery of non-working loops.</p> <p>Metric should be clarified to make clear that an early cut would be included as a missed appointment if cut was restarted within</p>	<p>UNE-loop hot cut (two volume categories)</p>	<p>CLEC: 95% for 1-10 lines in 1 hour and for 11 or more lines in 2 hours.</p> <p>GA: 95% in 15 minutes</p> <p>FL: 95% in 15 minutes.</p> <p>The benchmark should be 95% completed within cutover window. BellSouth only appears to be measuring whether the cut</p>

CLEC REQUESTED SQM CHANGES

	<p>original window. Thirty minute buffer is excessive. Different intervals for IDLC are inappropriate and unjustified.</p>		<p>started on time, but does not measure whether it finished within the cutover window proposed by the CLECs.</p> <p>BellSouth's interval represents a flawed calculation that does not depict the actual performance on each individual cut. In any event, BellSouth's 15 minutes per loop is excessive and even the CLEC's standard above is generous considering it should not take more than 5 minutes per loop for conversion.</p>
<p>P-7b CCC-Average Recovery Time</p>	<p>Only verified end user and CLEC caused reasons should be excluded. (i.e. the CLEC has to agree). Outages during and before the cut are included, not just those that can be reported after order completion through maintenance systems. BellSouth may separate out the later group of restorals and measure them as a disaggregation of Maintenance Average Duration with the same benchmark if it prefers.</p>	<p>UNE-loop hot cut</p>	<p>CLEC: 98% in 1, 100% in 2 hours.</p> <p>GA: Diagnostic</p> <p>FL: FL TBD in Six-months.</p> <p>These outages were caused by BellSouth's cut-over errors and, thus, should be easy for it to diagnose and resolve</p>
<p><i>OP-111 and 112 Mean Time and Percent of Customers Restored to ILEC</i></p>	<p>See CLEC business rules..</p>	<p>UNE-loop hot cut</p>	<p>CLEC: 98% in 1 hour; 100% in 2 hours. No more than 1% restored to ILEC.</p> <p>GA:</p>

CLEC REQUESTED SQM CHANGES

			<p>NA</p> <p>FL: NA</p>
P-7c Hot Cut Provisioning Troubles in 7 Days		<p>UNE-loop hot cut</p> <p>3 geographic areas (very competitive, somewhat competitive and little or no competition.)</p>	<p>CLEC: No more than 1%.</p> <p>GA: Assumed BST's 5% Accepted.</p> <p>FL: 5%</p> <p>The benchmark should be 1%, not 5% as BST proposes. At the very least the Verizon-NY standard of 2% should be adopted</p>
<i>OP-108 Percent Orders Cancelled or Supplemented at the Request of the ILEC</i>	See CLEC business rules.	Hot cuts	<p>CLEC: No more than 1%.</p> <p>GA: NA</p> <p>FL: NA</p>
<i>OP-109 Percent of Hot Cuts Not Working as Initially Provisioned.</i>	See CLEC business rules.	Hot cut loop	<p>CLEC: No more than 1%</p> <p>GA: NA</p> <p>FL: NA</p>
<p><i>OP-118 Percent Successful xDSL Cooperative Service Testing</i></p> <p>P-8 Cooperative Acceptance Testing Percent xDSL Loops Tested</p>	<p>Business Rules: BST needs to add language Florida required that defines successful testing as the loop working and adjusts the denominator.</p> <p>(1) In the Definition Portion, add "A loop will be considered successfully cooperatively tested when both the ALEC and ILEC representative agree that the loop has passed the cooperative testing."; and (2) In the SEEM Analog/ Benchmark, replace "95% of Lines Tested" with "95% of Lines Tested Successfully Pass Cooperative Testing."</p>	<p>2 wire xDSL 4 wire xDSL line sharing line splitting</p> <p>3 geographic areas (very competitive, somewhat competitive, little or no competition.)</p>	<p>CLEC: 98% of lines tested, no more than 0.5% should fail initial test.</p> <p>GA: 95%</p> <p>FL: 95%</p>

CLEC REQUESTED SQM CHANGES

<p>OP-120 Percent Successful Completion of Modification/Conditioning for xDSL Loops</p>	<p>See CLEC business rules. As Florida allowed in ordering this metric, the same issue could be addressed disaggregating Missed Appointments for xDSL with and without conditioning. (As BST does for OCI now.). CLECs also would like to see this disaggregation for held orders if no separate metric is ordered.</p>	<p>2 wire xDSL 4 wire xDSL line sharing line splitting</p> <p>3 geographic areas.</p>	<p>CLEC: 95% 5 days for modification/conditioning. GA: As OCI metric Disaggregation 7 days without; 14 days with mod/con</p> <p>FL: As OCI and MA Metric disagg, 5 days without; 12 days with.</p>
<p>P-9 Percent Provisioning Troubles in 30 Days of Order Completion</p>	<p>Business Rules: The metric should include all trouble reports arising from the same order. A customer may experience several service disruptions related to provisioning problems and each should count as a provisioning trouble.</p>	<p>Same. But instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting Replace UNE Digital Loop > DS1 with: 7. UNE DS1 8. UNE DS3 and higher Replace UNE ISDN with: 9. UNE ISDN PRI 10. UNE ISDN BRI Replace UNE Combos Other with: 11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration Replace Resale ISDN: 13. Resale ISDN PRI 	<p>CLEC: Parity (see Analog chart)</p> <p>GA: Parity with Some different Analogs.</p> <p>FL: Parity with Some different Analogs.</p>

CLEC REQUESTED SQM CHANGES

		<p>14. Resale ISDN BRI 15. Add Resale DID trunks 16. BST-to-CLEC trunks 17. Projects .</p> <p>3 geographic areas.</p>	
P-10 Total Service Order Cycle Time	See above..	Not requested by CLECs.	<p>CLEC: Diagnostic.</p> <p>GA: Same.</p> <p>FL: Same.</p>
<i>OP-104 (O-11 in GA)</i> Service Order Accuracy	Business Rules: Sampling process should be nonbiased and robust enough to be reliable for each order type. Process should be described in detail. BST should eventually move toward process that compares each LSR to each post provisioning CSR or preferably fielded completion notice when available and move away from sampling process.	<p>1. Resale Residential 2. Resale Business 3. Resale ISDN-PRI 4. Resale Centrex 5. UNE- 2 wire voice loop 6. UNE-2 wire xDSL loops 7. UNE-4-wire xDSL loops 8. UNE-platform 9. UNE-other</p> <p>State Specific.</p>	<p>CLEC: 99% accurate</p> <p>GA: 95%</p> <p>FL: 95%</p>
P-12 LNP-Percent Missed Installation Appointments	No change.	<p>Hot Cut with LNP</p> <p>Stand Alone LNP</p> <p>3 geographic areas.</p>	<p>CLEC: 5% missed.</p> <p>GA: Same</p> <p>FL: Same</p>
P-13 LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	<p>Business Rules: BellSouth should be required to actually perform the disconnect activity before completing the service order in SOCs.</p> <p>CLECs still need this measure and it should not be eliminated as BST proposes. It's substitute metrics do not cover the same areas.</p>	LNP with Loop Stand Alone LNP	<p>CLEC: < 15 minutes</p> <p>GA: Same</p> <p>FL: Same.</p>
P-14 LNP-Total Service Order Cycle Time	No change.	Not requested by CLECs.	<p>CLEC: None proposed.</p> <p>GA: None mentioned.</p> <p>FL: TBD</p>

CLEC REQUESTED SQM CHANGES

MAINTENANCE & REPAIR			
<p>M&R-1 Missed Repair Appointments</p>	<p>Exclusions: BellSouth may exclude customer provided or CLEC equipment troubles from the metric but it should report the number of exclusions monthly. This will enable the CLEC to monitor whether the exclusions seem high and perhaps were wrongly coded. In New York and Pennsylvania, Verizon reports such exclusions separately. Business Rules: The end time should be when the CLEC receives notice that the service is restored. This will enable the CLEC to notify BellSouth promptly if it disagrees that the service has been restored.</p>	<p>Same. But instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting 7. Replace UNE Digital Loop > DS1 with: 8. UNE DS1 9. UNE DS3 and higher <p>Replace UNE ISDN with:</p> <ol style="list-style-type: none"> 10. UNE ISDN PRI 11. UNE ISDN BRI <p>Replace UNE Combos</p> <p>Other with:</p> <ol style="list-style-type: none"> 12. Enhanced Extended Loop (Dispatch) 13. Special Access to EELs Migration <p>Replace Resale ISDN:</p> <ol style="list-style-type: none"> 14. Resale ISDN PRI 15. Resale ISDN BRI 16. Resale DID trunks <p>3 disposition codes (software change, dispatch in and dispatch out) x geographic areas</p>	<p>CLEC:</p> <p>Parity with Retail Analogs.</p> <p>GA:</p> <p>Parity with some Differences in Analogs.</p> <p>FL:</p> <p>Parity with some Differences in Analogs.</p>
<p>M&R-2 Customer Trouble Report Rate</p>	<p>See MR-1.</p>	<p>Same. But instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long 	<p>CLEC:</p> <p>Parity with retail Analogs.</p> <p>GA:</p> <p>Parity with some Differences in Analogs.</p>

CLEC REQUESTED SQM CHANGES

		<p align="center">and Short</p> <ol style="list-style-type: none"> 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting Replace UNE Digital Loop > DS1 with: 7. UNE DS1 8. UNE DS3 and higher Replace UNE ISDN with: 9. UNE ISDN PRI 10. UNE ISDN BRI <p>Replace UNE Combos Other with:</p> <ol style="list-style-type: none"> 11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration <p>Replace Resale ISDN:</p> <ol style="list-style-type: none"> 13. Resale ISDN PRI 14. Resale ISDN BRI 15. Resale DID trunks <p>3 geographic areas.</p>	<p>FL: Parity with some Differences in Analogs.</p>
<p>M&R-3 Maintenance Average Duration</p>	<p>Exclusions: Customer and CLEC equipment troubles may be excluded but should be reported separately for the reasons stated in MR-1. BellSouth also should not exclude troubles that have lasted more than 10 days. There is no reason to exclude the longest or the shortest duration from this metric. Doing so only provides an inaccurate metric report.</p> <p>Business Rules: The trouble report should not be considered closed or service restored until the CLEC is given notice. "Restore" means to return to the normally expected operating parameters for the service and verification by the CLEC that the service has been restored. CLECs must be able to verify when informed that the trouble is closed that service has been restored to the customer. This will reduce the number of repeat trouble reports for services that were prematurely closed by BellSouth, but</p>	<p>Same. But instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting Replace UNE Digital Loop > DS1 with: 7. UNE DS1 8. UNE DS3 and higher Replace UNE ISDN with: 9. UNE ISDN PRI 10. UNE ISDN BRI <p>Replace UNE Combos</p>	<p>CLEC: Parity with retail Analogs.</p> <p>GA: Parity with some Differences in Analogs.</p> <p>FL: Parity with some Differences in Analogs.</p>

CLEC REQUESTED SOM CHANGES

	<p>prematurely closed by BellSouth, but the CLEC customer's service is still impaired.</p>	<p>Other with: 11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration Replace Resale ISDN: 13. Resale ISDN PRI 14. Resale ISDN BRI 1. Resale DID trunks 3 disposition codes (software change, dispatch in and dispatch out) and 3 geographic areas</p>	
<p>M&R-4 Percent Repeat Troubles within 30 Days</p>	<p>Business Rules: Customer and CLEC equipment trouble exclusions should be reported separately (See MR-1). Calculation: The denominator for the metric should be all repeat troubles received in the month, rather than all troubles closed. Using BellSouth's calculation could understate the problem for a month in which numerous troubles have not been closed by the end of the month.</p>	<p>Same as BST but instead of UNE xDSL loop 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting Replace UNE Digital Loop > DS1 with: 7. UNE DS1 8. UNE DS3 and higher Replace UNE ISDN with: 9. UNE ISDN PRI 10. UNE ISDN BRI Replace UNE Combos Other with: 11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration Replace Resale ISDN: 13. Resale ISDN PRI 14. Resale ISDN BRI 15. Resale DID trunks 3 geographic areas</p>	<p>CLEC: Parity with retail Analogs. GA: Parity with some Differences in Analogs. FL: Parity with some Differences in Analogs.</p>

CLEC REQUESTED SQM CHANGES

<p>M&R-5 Out of Service > 24 Hours</p>	<p>No change.</p>	<p>But instead of UNE xDSL loop</p> <ol style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops. 6. Line Splitting <p>Replace UNE Digital Loop > DS1 with:</p> <ol style="list-style-type: none"> 7. UNE DS1 8. UNE DS3 and higher <p>Replace UNE ISDN with:</p> <ol style="list-style-type: none"> 9. UNE ISDN PRI 10. UNE ISDN BRI <p>Replace UNE Combos Other with:</p> <ol style="list-style-type: none"> 11. Enhanced Extended Loop (Dispatch) 12. Special Access to EELs Migration <p>Replace Resale ISDN:</p> <ol style="list-style-type: none"> 13. Resale ISDN PRI 14. Resale ISDN BRI 15. Add Resale DID trunks <p>3 geographic areas</p>	<p>CLEC: Parity with retail Analogs.</p> <p>GA: Parity with some Differences in Analogs.</p> <p>FL: Parity with some Differences in Analogs.</p>
<p>M&R-6 Average Answer Time-Repair Center</p>	<p>No change..</p>	<p>Each Repair Center</p>	<p>CLEC: 95% calls should be answered in 20 seconds, and 100% in 30 seconds</p> <p>GA: Parity with Retail.</p> <p>FL: Parity with retail.</p>
<p>M&R-7 Mean Time to Notify CLEC of Network Outage</p>	<p>Parity by design needs to be confirmed by KPMG. If confirmed, no metric is needed, just information on how to get the same notices at</p>	<p>Same as BST.</p>	<p>CLEC: Parity.</p>

CLEC REQUESTED SQM CHANGES

	the same time and manner as BellSouth.		GA: Same. FL: Same.
<i>MR-101 Call Abandonment Rate (Maintenance)</i>	See CLEC business rules.	Regional Repair Center	CLEC: No more than 1%. GA: NA. FL: NA.
BILLING			



B-1 Invoice Accuracy	<p>Business Rules: Invoice accuracy should not be based on adjustment dollars, as BellSouth is in control of whether or not it grants an adjustment, and is therefore in control of the outcomes of this measurement.</p> <p>CLECs request that the Commission order the additional billing measures in my direct testimony to address wholesale bill performance.</p>	Same as BST.	CLEC: Parity. GA: Parity. FL: Parity.
B-2 Mean Time to Deliver Invoices	<p>Business Rules : This measure should be modified to be based on percent invoices received on time, or the Commission should adopt the Percent On-Time Mechanized Local Service Invoice Delivery measure recommended by the CLECs.</p>	Replace with: CRIS CABS	CLEC: Parity. GA: CRIS released In six business Days; CABs in 8 Business days Average intervals Are comparable To BST for both

CLEC REQUESTED SQM CHANGES

			Systems.. FL: Parity.
B-3 Usage Data Delivery Accuracy	<p>Bills rejected because of BellSouth formatting or content errors should be included. It is not the CLEC's fault the bill was delayed because of these errors. A useless bill should not be counted as on-time.</p> <p>Calculation: CLECs believe the metric should reflect the number of records not data packs delivered accurately. This is more in line with how accuracy has been calculated in the past for usage data.</p>	Resale UNE-P Interconnection	CLEC: Parity. GA: Parity. FL: Parity.
B-4 Usage Data Delivery Completeness	No change.	CABs CRIS	CLEC: Parity GA: Parity FL: Parity
B-5 Usage Data Delivery Timeliness	No change.	CABs CRIS	CLEC: Parity. GA: Parity. FL: Parity.
B-6 Mean Time to Deliver Usage	<u>Business Rules:</u> CLECs believe that the measurement should begin with the generation of data by the CLEC retail customer or CLEC access customer (by the AMA recording equipment associated with the CLEC switch.). This will ensure that all usage (local and associated access) is covered by this metric	CABs CRIS	CLEC: Parity. GA: Parity FL: Parity
B-7 Recurring Charge Completeness	No change.	CABs CRIS	CLEC: Resale Parity UNE 90%. GA: Resale: Parity UNE: 90% Interconnection: 90% FL: Resale: Parity UNE: 90%

CLEC REQUESTED SQM CHANGES

			Interconnection: 90%
B-8 Non-Recurring Charge Completeness	No change.	CABs CRIS	CLEC: Resale Parity UNE 90%. GA: Resale: Parity UNE: 90% Interconnection: 90% FL: Resale: Parity UNE: 90% Interconnection: 90%
<i>B-105 Percent Billing Errors Correcting in X Days</i>	See CLEC business rules.	DUF Customer Bill Impacting Non-Customer Bill Impacting Invoice	CLEC: Severity 1: 90% in 24 hours, 100% in 5 business days. Severity 2: 90% corrected in 3 business days, 100% in 10 business days. GA: NA FL: Diagnostic
OPERATOR SERVICES AND DIRECTORY ASSISTANCE			
OS-1 Speed of Answer/Average Speed of Answer-Toll	Exclusions: BellSouth should not exclude call abandonment times. The customers likely abandoned the call because of lengthy waits for a response and such time should be included in the metric calculation. If the Commission adopts the CLECs' proposed new measure on call abandonment then this issue is moot.	One Center if there is only one	CLEC: 90% greater than 10 seconds GA: Parity by design FL: Parity by Design
OS-2 Speed of Answer/Percent Answered in X Seconds	See above.	One Center if there is only 1	CLEC: Verified parity By design.

CLEC REQUESTED SQM CHANGES

			<p>GA: Parity</p> <p>FL: Parity by design. Standard: CLECs propose that 95% of calls be answered in 10 seconds. The metric would have to be changed from an average measure to a Percent in 10 Seconds to suit this benchmark. Otherwise the benchmark needs to be restated as an acceptable average. In no case, should the standard be worse than the end user standard for answering such calls, as the CLECs need to meet the end user standard.</p>
DA-1 Speed of Answer/Average Speed of Answer-DA	See above.	One Center if there is only 1	<p>CLEC: 90% in 10 seconds..</p> <p>GA: Parity.by design</p> <p>FL: Parity.</p>
DA-2 Speed of Answer/ Percent Answered within X Seconds	See above.	One Center if there is only 1	<p>CLEC: 90% within 10 seconds.</p> <p>GA: Parity by design.</p> <p>FL: Parity</p>
DATABASE UPDATE INFORMATION			
D-1 Average Database Update Interval;	Parity by design needs to be confirmed by KPMG	Same as BST.	<p>CLEC: 99.9% in 24 hours.</p> <p>GA: Parity by design.</p> <p>FL: Parity</p>
D-2 Percent Database Update Accuracy	See above.	Same as BST.	<p>CLEC: 99.9% accurate.</p>

CLEC REQUESTED SQM CHANGES

			GA: 95% accurate FL: Parity
D-3 Percent NXXs and LRN's Loaded by LERG Effective Date	Business Rules: BellSouth's business rules should not define the interval by the completion of initial interconnection trunk groups when that happens after the LERG effective date. Otherwise, BellSouth could delay delivery of trunks to cover late LERG updates. Or a CLEC may plan to launch with only the tandem connections installed and BellSouth may wait until all direct end office connects are installed to complete its LERG updates. The late LERG update would mean that the CLEC would have to delay the revenue readiness date for trunk groups it does not need initially when capacity needs are lower. The LERG effective date should be the end time in all cases.	Same as BST.	CLEC: 100% by LERG effective date. GA: 100% by LERG effective date FL: 100% by LERG effective date.
<i>MI-102 Average Time Allotted to Proof Listing Updates Before Publication</i>	See CLEC business rules.	By Directory Closing	CLEC: Parity GA: NA FL: NA
E911			
E-1 Timeliness	CLECs have no changes to these measures but want third-parity verification of BellSouth's claims that its E911 update processes are parity by design.	Same as BST.	CLEC: Parity GA: Parity by design. FL: Parity by Design.
E-2 Accuracy	See above.	Same as BST.	See above.
E-3 Mean Interval	See above.	Same as BST.	See above.
TRUNK GROUP PERFORMANCE			
TGP-1 Trunk Group Performance-Aggregate	Business Rules: CLECs are seeking the inclusion of 911 trunks in this measure along with the OS/DA trunks that BellSouth has agreed to add.	DesignType: 2% 1% 0.5% blocking Standards: BellSouth's 0.5% buffer is not acceptable. The measure should be based on parity in not exceeding the various blocking design levels.	CLEC: Dedicated trunk groups not to Exceed blocking Threshold of B.01. Common trunk Blocking: No More than 2% Groups exceeding B.01 for CLEC/ LD traffic sharing common ILEC

CLEC REQUESTED SQM CHANGES

			<p>trunks. 2% of end offices exceeding 2% blocking design where CLEC traffic traverses a separate trunk than ILEC traffic.</p> <p>GA: Any 2 hour period In 24 hours where CLEC blockage Exceeds BST Blockage by 0.5% Using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BST.</p> <p>FL: Any 2 hour period In 24 hours where CLEC blockage Exceeds BST Blockage by 0.5% Using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BST.</p>
TGP-2 Trunk Group Performance-CLEC Specific	See above.	See above	See above.
COLLOCATION			
C-1 Collocation Average Response Time	<p><u>Business Rules:</u> Augments of existing collocations should be included in this metric. CLECs require timely responses when seeking to augment existing collocations as well to initiating new collocation construction. BellSouth's SQM appears to be making some movement toward better collocation disaggregation, but it still is missing some key areas such as remote and adjunct collocations.</p>	<p>Same but replace Physical Caged Augment with: Physical Caged 45-day augment. Physical Caged 60-day augment Remote 3 geographic</p>	<p>CLEC: 95% in 10 days</p> <p>GA: Immediately: Virtual: 20 calendar days Physical: 30 calendar days. Caged/Cageless: 30 calendar days.</p> <p>6 months. Virtual: 10 Calendar days; Physical 20</p>

CLEC REQUESTED SOM CHANGES

			<p>Calendar days; Caged/Cageless: 20 days.</p> <p>FL: Virtual, Physical Caged, Physical Cageless = 15 Days.</p> <p>Standards: CLECs agree to accept the intervals established in the Commission's separate collocation proceeding, including a definition of what CLEC changes would and would not stop the clock on measuring time intervals.</p>
<p>C-2 Collocation Average Arrangement Time</p>	<p>Business Rules: BellSouth should not be permitted to remove permit time. BellSouth should be accountable for the intervals for which it is responsible for having work completed. Removing permit time removes any incentive for BellSouth to conduct parallel work activities or work with government agencies for expeditious issuance of permits. Neither the performance plan of New York or Texas provides for such exclusions.</p> <p>Further, a collocation should not be considered complete until the CLEC accepts the collocation and associated cable assignment information is provided. This definition has been adopted in New York and other states in the Verizon region.</p>	<p>Same as BST but replace Physical Caged Augment with: Physical Caged 45-day augment. Physical Caged 60-day augment And Remote 3 geographic</p>	<p>CLEC: Physical = 90 Calendar days. Physical Augment 90 calendar days Physical Augment 45 calendar days Virtual 60 calendar Days Virtual Augment 60 calendar days Virtual Augment 45 calendar days Cageless 60 Calendar days Remote 45 Calendar days</p> <p>GA: Virtual: 50 calendar days (ordinary) 75 calendar days (extraordinary) Physical/Caged: 90 calendar days; Cageless: 60 calendar days (ordinary); 90 calendar days</p>

CLEC REQUESTED SQM CHANGES

			<p>(extraordinary)</p> <p>FL: Virtual-60 Calendar Days Virtual - Augment - 45 Calendar Days (w/o Space Increase) Virtual - Augment- 60 Calendar Days (with Space Increase) Physical Caged - 90 Calendar Days (Ordinary) Physical Caged - Augment - 45 Calendar Days (w/o Space Increase) Physical Caged - Augment - 90 Calendar Days (with Space Increase) Physical Cageless - 90 Calendar Days Physical Cageless - Augment - 45 Calendar Days (w/o Space Increase) Physical Cageless - Augment - 90 Calendar Days</p>
<p>C-3 Collocation Percent Missed Due Dates</p>	<p>Sec CO-1 and CO-2.</p>	<p>Same plus Remote 3 geographic</p>	<p>CLEC: 100% in Physical = 90 Calendar days. Physical Augment 90 calendar days Physical Augment 45 calendar days Virtual 60 calendar Days Virtual Augment 60 calendar days Virtual Augment 45 calendar days Cageless 60 Calendar days Remote 45 Calendar days</p> <p>GA: 95% in Virtual: 50 calendar days</p>

CLEC REQUESTED SQM CHANGES

			<p>(ordinary) 75 calendar days (extraordinary) Physical/Caged: 90 calendar days; Cageless: 60 calendar days (ordinary); 90 calendar days (extraordinary)</p> <p>FL: 95% in Virtual-60 Calendar Days Virtual - Augment - 45 Calendar Days (w/o Space Increase) Virtual - Augment- 60 Calendar Days (with Space Increase) Physical Caged - 90 Calendar Days (Ordinary) Physical Caged - Augment - 45 Calendar Days (w/o Space Increase) Physical Caged - Augment - 90 Calendar Days (with Space Increase) Physical Cageless - 90 Calendar Days Physical Cageless - Augment - 45 Calendar Days (w/o Space Increase) Physical Cageless - Augment - 90 Calendar</p>
<p>CM-I Timeliness of Change Management Notices</p>	<p>No change.</p>	<p>Emergency Regulatory Requirement Industry Recommended Major Minor CLEC Initiated BST Initiated</p>	<p>CLEC: 98% on time and extend notice interval to 90 days.</p> <p>GA: Interval as Proposed by BST, but Change</p>

CLEC REQUESTED SQM CHANGES

			<p>Management Team to issue Report on Notice Interval In 30 Days</p> <p>FL: 98% on time</p>
CM-2 Change Management Notice Average Delay Days	No change.	Same as above	<p>CLEC: No more than 3 days. GA: 5 days FL: 5 days Benchmark should be 95% in 5 days. For 30 days it should be a shorter delay day interval of no more than 3 days.</p>
CM-3 Timeliness of Documents Associated with Change	<p>Exclusions: BellSouth's proposed exclusion for dates that slip less than 30 days "for reasons outside BellSouth control" is too broad.</p> <p>A Five day interval for documentation changes is too short for CLECs to be able to implement changes. CLECs recommend 30 days for documentation changes, unless it is for error correction, which should be provided within the five day timeframe. Further, if the documentation is associated with software changes, 90 days or more is needed for major releases.</p>	Same as above.	<p>CLEC: 98% on time Extend interval From 30 to 90 Days.</p> <p>GA: Interval as Proposed by BST, but Change Management Team to issue Report on Notice Interval In 30 Days.</p> <p>FL: 98% on time.</p>
CM-4 Change Management Documentation Average Delay Days	See above.	Same as above.	<p>CLEC: No more than 3 days. GA: 5 days FL: 95% in 5 days.</p>
CM-5 Notification of CLEC Interface Outages	Business Rules: BellSouth should explain how it verifies an outage and the interval between the first notice of the outage and verification. If this interval is long, the notice could be	Same as BST.	<p>CLEC: 97% in 15 minutes</p>

CLEC REQUESTED SQM CHANGES

	<p>delayed and still appear to be on time because of “verification” condition. See KPMG August 20, 2001 Florida Exception 81 also found the term “verification” ambiguous, stating that “lack of clarity in defining the verification process may lead to misleading metric results.” BellSouth, in fact, should define clearly the start and stop time for the notice of the outage. BellSouth has also claimed during the Florida OSS test that it does not have to report outages unless they last longer than 20 minutes. This is not in the current Georgia SQM business rules as an exclusion. CLECs should be notified immediately of any discovered outage so that they can plan to use workarounds if the outage continues. It also delays the reporting of the outage if BellSouth waits 20 minutes before it starts the clock.</p>		<p>GA: 97% in 15 minutes</p> <p>FL: 97% in 15 minutes.</p>
<p>CM-6 Percent ILEC vs. CLEC Changes Made</p>	<p>See CLEC business rules in Attachment I to address problems for CLECs in getting their change requests implemented. This metric has been proposed in GA six-month review.</p>	<p>CLEC Initiated BST Initiated</p>	<p>CLEC: Parity with BST top 30 Changes.</p> <p>GA: NA</p> <p>FL: NA</p>
<p align="center">BONA FIDE/NEW BUSINESS REQUEST PROCESS</p>			
<p><i>BFR-1 Percentage of BFR/NBR Requests Processed Within 30 Business Days.</i></p>	<p>GA ordered but BST omitted from interim metrics. Texas in second six-month review refused to let SWBT eliminate similar metric when it used the same small sample size excuse as BST.</p>	<p>Same as BST</p>	<p>CLEC: 95% on time</p> <p>GA: Same as CLEC</p> <p>FL: NA</p>
<p><i>BFR-2 Percentage of Quotes Provided for Authorized BFR/NBRs Processed in 10./30/60 Business Days</i></p>	<p>GA ordered but ST omitted from interim metrics. Texas in second six-month review refused to let SWBT eliminate similar metric when it used the same small sample size excuse as BST.</p>	<p>Same as BST.</p>	<p>CLEC:</p> <p>GA: Same as CLEC.</p> <p>FL: NA</p>

ATTACHMENT I-ADDITIONAL MEASURES

Additional Measures Proposed by CLECs

<p>Report/Measurement:</p> <ul style="list-style-type: none"> • Average Time to Reject/Accept Change Request • Percent Pending Top 30 Changes • Percent Requests Cancelled by BellSouth (Pre- or Post- Acceptance) • Average Interval to Implement Top 30 Change Requests (CLEC Initiated vs. BellSouth initiated)
<p>Definition:</p> <p>The above metrics are designed to measure BellSouth’s responsiveness to change requests. The first measure captures whether BellSouth adheres to its business rules on accepting or rejecting change requests in a timely manner. The second measure captures how often BellSouth unilaterally cancels a request before or after acceptance. And the third focuses on the length of time it takes BellSouth to implement the top 30 requests the CLECs have prioritized versus the top 30 of its own internally initiated requests (including those proposed by the LCSC and ongoing third-party OSS tests.).</p>
<p>Exclusions:</p> <ul style="list-style-type: none"> • For Average Implementation metric, Change Requests ranked 31 or greater after the most recent ranking. • Type 6 Changes.
<p>Business Rules:</p> <p>For the acceptance/rejection interval, the time starts when BellSouth receives a complete change control request from a CLEC and ends when an acceptance or rejection notice is issued to that CLEC. The cancellation metric is reported for all pending notices that have not been rejected. In calculating the Average Implementation Interval, the time begins when the accepted request first appears on the top 30 list and ends when the request is actually implemented, not just proposed for a release date. Regulatory mandates of implementation of a request on the CLEC’s top 30 list should be counted as part of this metric. Any regulatory change not listed on the top 30 priorities do not count as part of the CLEC designation. For BellSouth-initiated changes, the time begins when BellSouth internally ranks and publishes its top 30 internal changes, BellSouth needs to establish rules that provide CLECs with equity in capacity on software releases.</p>
<p>Calculation:</p> <p>Percent Change Request Rejections/Acceptances in 5 Days = $\frac{\sum (\text{Change Requests Received in } \leq 5 \text{ Days})}{\text{II Responses Due in Month (Count 5 business days from filing date and include all those from the current month)}} \times 100$</p> <p>Percent Cancelled Change Requests = $\frac{(\text{Total of Non-Rejected Change Requests Cancelled in Month} / \text{Total Pending Non-Rejected Change Requests.}) \times 100$</p> <p>Average Interval to Implement Top 30 Change Requests = $\frac{(\text{Date Change Request Implemented in Software Release} - \text{Date Ranked in Top 30 Changes})}{\text{Top 30 Changes in Reporting Period.}}$</p> <p>Percent Pending Top 30 Changes = $\frac{\text{Number of Changes Pending, but not Implemented During Reporting Period.}}{30 \text{ Top Changes in Reporting Period.}}$</p>
<p>Report Structure:</p> <ul style="list-style-type: none"> • CLEC Specific • CLEC Aggregate • BST
<p>Level of Disaggregation:</p>

Additional Measures Proposed by CLECs

All to 30 changes may be aggregated (if BellSouth prefers to define beforehand and rank by levels of importance, it may do so as long as CLECs agree to the designations.)

Retail Analog/Benchmark:

- Percent Reject/Accept Change Request Received in 5 Days = 95% in 5 business days.
- Percent Requests Cancelled by BellSouth (Pre- or Post- Acceptance) Diagnostic
- Average Interval to Implement Top 30 Change Requests (CLEC Initiated vs. BellSouth initiated) = Parity with BellSouth top 30 planned changed.
- Percent Pending Top 30 Changes = Diagnostic

Additional Measures Proposed by CLECs

Report/Measurement:
Ordering Trouble Ticket Responses in X Days
Definition:
This measures whether the ILEC has responded to ordering trouble tickets in a timely manner. Different intervals are established based on whether the problem is keeping CLECs from ordering activities or advising customers of the status of their order (rejections for unclear reason, missing notifiers, etc.) and other important but non-order impacting issues are pending. (i.e thousands of missing orders, confirmations or completions.).
Exclusions:
<ul style="list-style-type: none"> • Requests for Information Clearly Stated on Web Site (BellSouth must provide cite to CLEC when advising that response intervals required by this metric do not apply.)
Business Rules:
ILEC must report on whether or not time committed to CLEC in contracts, separate agreements or at time of call are being kept by ILEC's support centers. For instance, if the type of trouble requires a response in 24 hours, then on-time responses would be those received within 24 hours after the CLEC places a query to the appropriate point of contact and compared to all the responses to billing queries due that reporting period. All queries answered while the CLEC or ILEC retail customer is on the phone will be considered on time for this metric.
<ul style="list-style-type: none"> • Responses do not necessarily have to resolve issue but must provide additional information on the status of resolving the query. Any new response promised in providing a partial response must be measured for on-time performance as well and will be counted as a new request. • If CLEC poses more than one question on same call, ILEC may provide different response commitments for each query and measure each query separately. • CLEC and ILEC may devise a priority rating system for measurement by which the CLEC will identify the type of query upon reaching a representative at the CLEC center and the type of response interval required for such a query. (i.e., questions regarding problems with an OSS gateway blocking order placement or pre-order queries may receive a higher priority than a question to explain a business rule that is not impeding order activity.) • If ILEC is uncertain about whether response qualified as meeting the commitment interval, ILEC may seek CLEC agreement that response commitment has been met. Responses that no action has been taken yet on a query do not count as timely. <p>If a question is posed to the wrong center, the center receiving the query will direct the CLEC immediately to the appropriate center to respond to the question. Otherwise start time begins with initial call..</p>
Calculation:
Ordering Trouble Ticket Responses in X Days = $\frac{\Sigma (\text{Number of Responses Timely Received})}{(\text{Number of Responses Due in Reporting Period})} \times 100$
Report Structure:
<ul style="list-style-type: none"> • CLEC Specific • CLEC Aggregate • BST Aggregate • BST Affiliate
Level of Disaggregation:
<ul style="list-style-type: none"> • Company (If dedicated representatives assigned to specific CLECs) • Each CLEC Help Desk/Support Center (PreOrder, Ordering, Billing, etc.) • Severity Type
Retail Analog/Benchmark:
<ul style="list-style-type: none"> • Billing = 100% in 24 hours of request for information • Pre-Ordering/Ordering Help Desk = 95% within 24 Hours for Order Impacting

Additional Measures Proposed by CLECs

- 95% within 3 business days for Other Requests

**ATTACHMENT II-DISSAGREGATION, ANALOGS,
AND BENCHMARKS**

Disaggregation, Analogs and Benchmarks		
Product Level	Benchmark-- 95% within x Days unless otherwise noted for <u>Order Completion Interval and Missed Appointments</u>	CLEC Proposed Retail analog for other provisioning and maintenance and repair measures ¹ (GA differences in italics)
1. Resold Residence POTS	1. Retail Analog	1. Retail Residential
2. Resold Business POTS	2. Retail Analog	2. Retail Business
3. Resale Design	3. Retail Analog	3. Retail Designed
4. Resale PBX	4. Retail Analog	4. Retail PBX
5. Resale Centrex	5. Retail Analog	5. Retail Centrex POTS (<i>all Centrex</i>)
6. Resold BRI ISDN	6. Retail Analog	6. ISDN BRI (<i>BRI and PRI together</i>)
7. Resold PRI ISDN	7. Retail Analog	7. ISDN PRI (<i>BRI and PRI together</i>)
8. Resold DID Trunks	8. Retail Analog	8. Retail DID
9. UNE Loop + Port Combination	9. Retail Residential POTS	9. Retail Res. POTS (<i>Retail Res and Bus</i>)
10. UNE < DS1	10. respectively	10. Retail DS0 (<i>DS1 and less</i>)
11. UNE DS1	11. Retail DS0	11. Retail DS1 (<i>DS1 and less</i>)
12. UNE DS3 and greater	12. Retail DS1	12. Retail DS3 and OCNs (<i>DS1 and greater</i>)
13. Unbundled 2W Analog Loop(Non-designed)	13. Retail DS3 and greater	13. Retail Residential POTS
14. Unbundled 2W Analog Loop(Designed)	14. 3, 7, and 10 days for a, b, c volumes	14. Retail DS0(Retail Res&Bus Dispatched)
15. Unbundled ISDN BRI	15. 3, 7, and 10 days for a, b, c volumes	15. Retail ISDN BRI (<i>BRI</i>)
16. Unbundled ISDN PRI	16. Same as above	16. Retail ISDN PRI (<i>BRI</i>)
17. Unbundled ADSL Loops	17. Same as above	17. Retail Residential POTS(<i>Retail ADSL</i>)
18. Unbundled HDSL Loops	18. Same as above	18. Retail Business POTS (<i>Retail ADSL</i>)
19. UCL (short and long)	19. Same as above	19. Retail ResidentialPOTS (<i>Retail ADSL</i>)
20. Unbundled 2 wire xDSL Loop	20. Same as above	20. Retail Residential POTS (<i>Retail ADSL</i>)
21. Unbundled 4 wire xDSL Loop	21. Same as above	21. Retail Business POTS (<i>Retail ADSL</i>)
22. Other Unbundled Loops	22. Same as above	22. Retail POTS Designed
23. Unbundled UDC/DSL loop	23. Same as above	23. ISDN (<i>Retail ADSL</i>)
24. UNE Switch Port	24. Same as above	24. Retail POTS
25. UNE Interoffice Transport	25. 2 days	25. ISDN (<i>Retail DS1/DS3 interoffice.</i>)
26. Interconnect Trunks (DS0s, DS1s and DS3s)	26. ILEC Trunks (excluding trunks for IXC's)	26. ILEC Trunks ² (<i>Retail Trunks may include IXC trunks</i>)
27. Two-Way Trunking or Inbound BST-to-CLEC trunks	27. ILEC Trunks (excluding trunks for IXC's)	27. ILEC Trunks
28. Line-sharing/High Frequency Spectrum UNE	28. 3 days	28. Retail Res. POTS (<i>ADSL provide to retail</i>)
29. Line-splitting/High Frequency Spectrum UNE	29. 3 days	29. Retail Res POTS (FL added w/ standard TBD)

¹ The analogs in the Georgia Order were for more aggregated metrics than those specified in the column below.

² There is lack of clarity on what Retail Trunks is referencing.

Disaggregation, Analogs and Benchmarks		
Product Level	Benchmark— 95% within x Days unless otherwise noted for <u>Order Completion Interval and Missed Appointments</u>	CLEC Proposed Retail analog for other provisioning and maintenance and repair measures¹ <i>(GA differences in italics)</i>
30. Enhanced Extended Loops	30. Special Access or ISDN PRI	30. Special Access or ISDN PRI (FL included with standard TBD)
31. Special Access to EELs Conversion	31. 10 business days	31. N/A
32. Projects	32. Retail Large Volume Equivalents	32. Retail Large Volume Equivalents

**EXHIBIT B-ENFORCEMENT MEASURES
RECOMMENDATION**

ENFORCEMENT MEASURES RECOMMENDATION¹

ENFORCEMENT MEASURES	GA ORDER TIER I	GA ORDER TIER II	CLEC TIER I	CLEC TIER II
Average Response Time(Pre-order)		Y		Y
OSS Availability		Y		Y
OSS Availability(M&R)		Y		Y
OSS Response Interval(M&R)				Y
Loop Makeup Response Interval – Manual	Y	Y	Y	Y
Loop Makeup Response Interval – Electronic	Y	Y	Y	Y
Acknowledgement Message Timeliness	Y	Y	Y	Y
Acknowledgement Message Completeness	Y	Y	Y	Y
Percent Flow-Through Service Requests		Y	Y	Y
Reject Interval	Y	Y	Y	Y
FOC Timeliness	Y	Y	Y	Y
Service Inquiry With LSR FOC Response Time - Manual			Y	Y
FOC and Reject Response Completeness	Y	Y	Y	Y
Speed of Answer in Ordering Center			Y	Y
LNP Average Reject Interval ²			Y	Y
LNP FOC ³			Y	Y
Mean Held Order Interval			Y	Y
Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice			Y	Y
Percent Missed Installation Appointment	Y	Y	Y	Y
Average Completion Interval	Y	Y	Y	Y
Average Completion Notice Interval			Y	Y
% Completion Attempts Without Notice or <24 Hours Notice			Y	Y
Coordinated Customer Conversion(CCC)	Y	Y	Y	Y
Hot Cut Timeliness % Within Interval	Y	Y	Y	Y
CCC – Average Recovery Time			Y	Y
Hot Cut Conversion - % Provisioning Troubles Received Within 7 Days of Completed Service Order	Y	Y	Y	Y
Cooperative Acceptance Testing - % of xDSL Loops Tested	Y	Y	Y	Y
% of Troubles Within 30 Days of Service Order Completion	Y	Y	Y	Y

¹ Measures in bold print have a CLEC recommendation that varies from the GA Order. Measures validated by an unbiased third-party as “parity-by-design” would not be included in the plan. Average Speed to Answer-OS, % Answered in “X” Seconds-OS, Average Speed to Answer-DA, % Answered in “X” Seconds-DA, E911 Timeliness, E911 Accuracy & E911 Mean Interval have not yet been appropriately validated as parity-by-design.

² Measure not required if LNP transactions included in the Average Reject Interval Measure.

³ Measure not required if LNP transactions included in the FOC Timeliness Measure.

ENFORCEMENT MEASURES	GA ORDER TIER I	GA ORDER TIER II	CLEC TIER I	CLEC TIER II
Service Order Accuracy			Y	Y
Total Service Order Cycle Time ⁴				
LNP Missed Installation Appointment ⁵	Y	Y	Y	Y
LNP Disconnect Timeliness	Y	Y	Y	Y
LNP Total Service Order Cycle Time ⁶				
Missed Repair Appointments	Y	Y	Y	Y
Customer Trouble Report Rate	Y	Y	Y	Y
Maintenance Average Duration	Y	Y	Y	Y
Percent Repeat Troubles Within 30 Days	Y	Y	Y	Y
Out of Service > 24 Hours			Y	Y
Average Answer Time – Repair Center			Y	Y
Mean Time to Notify CLEC of Network Outage				Y
Invoice Accuracy	Y	Y	Y	Y
Mean Time to Deliver Invoices	Y	Y	Y	Y
Usage Data Delivery Accuracy	Y	Y	Y	Y
Usage Data Delivery Completeness			Y	Y
Usage Data Delivery Timeliness			Y	Y
Mean Time To Deliver Usage			Y	Y
Recurring Charge Completeness			Y	Y
Non-Recurring Charge Completeness			Y	Y
Average Database Update Interval				Y
Average Database Update Accuracy				Y
Percent NXXs and LRNs Loaded by the LERG Effective Date			Y	Y
Average Speed to Answer – Toll				Y
Percent Answered in “X” Seconds - Toll				Y
Average Speed to Answer – DA				Y
Percent Answered in “X” Seconds - DA				Y
E911 Timeliness				Y
E911 Accuracy				Y
E911 Mean Interval				Y
Trunk Group Performance Aggregate		Y		Y
Trunk Group Performance Specific	Y		Y	
Collocation – Average Response Time			Y	Y
Collocation – Average Arrangement Time			Y	Y

⁴ This measure is not supported by CLECs. CLECs recommend a change to the interval for OCI measure.

⁵ Measure not required if LNP transactions included in Missed Installation Appointment

⁶ This measure is not supported by CLECs. CLECs recommend a change to the interval for OCI measure.

ENFORCEMENT MEASURES	GA ORDER TIER I	GA ORDER TIER II	CLEC TIER I	CLEC TIER II
Collocation – Percent Due Dates Missed	Y	Y	Y	Y
Timeliness of Change Management Notice		Y		Y
Change Management Notice Average Delay Days				Y
Timeliness of Documents Associated With Change		Y		Y
Change Management Documentation Average Delay Days				Y
Notification of CLEC Interface Outages				Y
Percentage of BFR/NBR Requests Processed Within 30 Business Days			Y	Y
Percentage of Quotes Provided for Authorized BFR/NBR Requests Processed Within X(10/30/60) Business Days				Y

ENFORCEMENT MEASURE DISAGGREGATION⁷

ENFORCEMENT MEASURES DISAGGREGATION⁸	GA ORDER	CLEC RECOMMENDATION
Average Response Time(Pre-order)	Average for all transactions	<ol style="list-style-type: none"> 1. Address(RSAG) 2. TN Reservation(ATLAS) 3. Appt. Scheduling(DSAP) 4. Customer Service Record(HAL/CRIS) 5. Feature/Service Availability(PSIMS, COFFT & OASIS) 6. Failed Queries 7. Percent Time Outs
OSS Availability	Average for all systems	<ol style="list-style-type: none"> 1. TAG 2. LENS 3. DOE 4. SOCS 5. ATLAS 6. RSAG 7. DSAP 8. BOCRIS 9. SONGS 10. HAL 11. PSIMS 12. LEO Mainframe 13. LEO UNIX 14. LESOG 15. EDI 16. LNP Gateway 17. XDSL Gateway
OSS Availability(M&R)		<ol style="list-style-type: none"> 1. TAFI 2. ECTA
OSS Response Interval(M&R)		<ol style="list-style-type: none"> 1. Create(or confirm logging of) 2. Obtain Status 3. Obtain Test Results 4. Cancel Request 5. Rejected/Failed Queries 6. Clearance Notification 7. Closure Notification
Loop Makeup Response Interval – Manual	Average Interval	Average Interval
Loop Makeup Response Interval – Electronic	Average Interval	Average Interval
Acknowledgement Message Timeliness	EDI TAG	<ol style="list-style-type: none"> 1. EDI 2. TAG
Acknowledgement Message Completeness	EDI TAG	<ol style="list-style-type: none"> 1. EDI 2. TAG
Percent Flow-Through Service	Residence	<ol style="list-style-type: none"> 1. Residence

⁷ All of the disaggregation guidelines specified in Exhibit KK-E apply to this matrix.

⁸ The CLECs recommend that the level of disaggregation that applies to reporting also apply to enforcement.

Requests	Business UNE LNP	<ol style="list-style-type: none"> 2. Business 3. LNP 4. UNE-Platform 5. UNE Loops
Reject Interval	Mechanized	<p>Mechanized</p> <p>Partially Mechanized</p> <p>Non-Mechanized</p> <ol style="list-style-type: none"> 1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design 30. Local Interoffice Transport 31. Local Interconnection Trunks
FOC Timeliness	Mechanized Partially Mechanized Non-Mechanized	<p>Mechanized</p> <p>Partially Mechanized</p> <p>Non-Mechanized</p> <ol style="list-style-type: none"> 1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher

		<ul style="list-style-type: none"> 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design 30. Local Interoffice Transport 31. Local Interconnection Trunks
Service Inquiry With LSR FOC Response Time Manual		<ul style="list-style-type: none"> 1. Unbundled UNE-derived ADSL Loop 2. Unbundled UNE-derived HDSL loop 3. UCL Loops Long and Short 4. Other 2 wire xDSL loops 5. Other 4 wire xDSL loops 6. Unbundled Interoffice Transport
FOC and Reject Response Completeness	Aggregated Result	<ul style="list-style-type: none"> Mechanized Partially Mechanized Non-Mechanized 1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design

		30. Local Interoffice Transport 31. Local Interconnection Trunks
Speed of Answer in Ordering Center		CLEC Local Carrier Centers(3)
LNP Average Reject Interval ⁹		1. Stand Alone LNP 2. UNE loop and LNP
LNP FOC ¹⁰		1. Stand Alone LNP 2. UNE Loop and LNP
Mean Held Order Interval		1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design 30. Local Interoffice Transport 31. Local Interconnection Trunks 32. Inbound BST-to-CLEC Trunk
Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice		Same as above plus Projects
Percent Missed Installation Appointment	Resale POTS Resale Design Loop + Port Combo UNE Loops UNE xDSL UNE Line Sharing	Same as above plus Projects

⁹ Measure not required if LNP transactions included in Average Reject Interval Measure

¹⁰ Measure not required if LNP transactions included in the FOC Timeliness Measure.

Average Completion Interval	Interconnection Trunks Resale POTS Resale Design Loop + Port Combo UNE Loops UNE xDSL UNE Line Sharing Interconnection Trunks	Same as above plus Projects
Average Completion Notice Interval		Same as above plus Projects
% Completion Attempts Without Notice or <24 Hours Notice		<ol style="list-style-type: none"> 1. UNE Loop – hot cuts 2. UNE 2-wire xDSL 3. UNE 4-wire xDSL 4. UNE-P
Coordinated Customer Conversion(CCC)	UNE loop hot cut	
Hot Cut Timeliness % Within Interval	UNE loop hot cut	UNE loop hot cut(two volume categories)
CCC – Average Recovery Time		UNE loop hot cut
Hot Cut Conversion - % Provisioning Troubles Received Within 7 Days of Completed Service Order	UNE loop hot cut	UNE loop hot cut
Cooperative Acceptance Testing - % of xDSL Loops Tested	xDSL	<ol style="list-style-type: none"> 1. 2-wire xDSL 2. 4-wire xDSL 3. Line Splitting 4. Line Sharing
% of Troubles Within 30 Days of Service Order Completion	Resale POTS Resale Design Loop + Port Combo UNE Loops UNE xDSL UNE Line Sharing Interconnection Trunks	<ol style="list-style-type: none"> 1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design

		<ul style="list-style-type: none"> 30. Local Interoffice Transport 31. Local Interconnection Trunks 32. Inbound BST-to-CLEC Trunk 33. Projects
Service Order Accuracy		<ul style="list-style-type: none"> 1. Resale Residential 2. Resale Business 3. Resale ISDN-PRI 4. Resale Centrex 5. UNE 2-wire voice loop 6. UNE 2-wire xDSL loops 7. UNE 4-wire xDSL loops 8. UNE-Platform 9. UNE-other
LNP Missed Installation Appointment ¹¹	LNP	<ul style="list-style-type: none"> 1. Loop with LNP 2. Stand Alone LNP
LNP Average Disconnect Timeliness	LNP	<ul style="list-style-type: none"> 1. LNP with Loop 2. Stand Alone LNP
Missed Repair Appointments	<ul style="list-style-type: none"> Resale POTS Resale Design Loop + Port Combo UNE Loops UNE xDSL UNE Line Sharing Interconnection Trunks 	<ul style="list-style-type: none"> 1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design 30. Local Interoffice Transport 31. Local Interconnection Trunks
Customer Trouble Report Rate	<ul style="list-style-type: none"> Resale POTS Resale Design 	<ul style="list-style-type: none"> 1. Resale Residence 2. Resale Business

¹¹ Measure not required if LNP transactions included in Missed Installation Appointment measure.

	<p>Loop + Port Combo UNE Loops UNE xDSL UNE Line Sharing Interconnection Trunks</p>	<ol style="list-style-type: none"> 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design 30. Local Interoffice Transport 31. Local Interconnection Trunks
<p>Maintenance Average Duration</p>	<p>Resale POTS Resale Design Loop + Port Combo UNE Loops UNE xDSL UNE Line Sharing Interconnection Trunks</p>	<ol style="list-style-type: none"> 1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing

		<ul style="list-style-type: none"> 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design 30. Local Interoffice Transport 31. Local Interconnection Trunks
Percent Repeat Troubles Within 30 Days	<ul style="list-style-type: none"> Resale POTS Resale Design Loop + Port Combo UNE Loops UNE xDSL UNE Line Sharing Interconnection Trunks 	<ul style="list-style-type: none"> 1. Resale Residence 2. Resale Business 3. Retail Design 4. Retail PBX 5. Retail Centrex 6. Resale ISDN PRI 7. Resale ISDN BRI 8. Resale DID 9. 2W Analog Loop Design 10. 2W Analog Loop Non-Design 11. LNP Stand Alone 12. UNE Digital Loop < DS1 13. UNE DS1 14. UNE DS3 & higher 15. UNE Loop + Port Combinations 16. UNE Switch Ports 17. Enhanced Extended Loops(Dispatched) 18. Special Access to EELs Migration 19. UNE-derived ADSL loop 20. UNE-derived HDSL Loop 21. UCL Loops Long & Short 22. Other 2 wire xDSL Loops 23. Other 4 wire xDSL Loops 24. UNE ISDN PRI 25. UNE ISDN BRI 26. Line Sharing 27. Line Splitting 28. UNE Other Design 29. UNE Other Non-Design 30. Local Interoffice Transport 31. Local Interconnection Trunks
Average Answer Time – Repair Center		Regional Repair Center(3)
Mean Time to Notify CLEC of Network Outage		All FCC Reportable Outages
Invoice Accuracy	CLEC State	<ul style="list-style-type: none"> 1. Resale 2. UNE 3. Interconnection
Mean Time to Deliver Invoices	CLEC State	<ul style="list-style-type: none"> 1. CRIS 2. CABS
Usage Data Delivery Accuracy	CLEC State	<ul style="list-style-type: none"> 1. Resale 2. UNE-P 3. Interconnection
Mean Time To Deliver Usage		<ul style="list-style-type: none"> 1. CRIS 2. CABS
Recurring Charge Completeness		<ul style="list-style-type: none"> 1. CRIS 2. CABS

Non-Recurring Charge Completeness		<ol style="list-style-type: none"> 1. CRIS 2. CABS
Average Database Update Interval		<ol style="list-style-type: none"> 1. LIDB 2. DL 3. DA
Average Database Update Accuracy		<ol style="list-style-type: none"> 1. LIDB 2. DL 3. DA
Percent NXXs and LRNs Loaded by the LERG Effective Date		% Loaded
Trunk Group Performance Aggregate	Monthly Blocking	Design Type: <ol style="list-style-type: none"> 1. 2% Blocking 2. 1% Blocking 3. 0.5% Blocking
Trunk Group Performance Specific	Monthly Blocking	Design Type : <ol style="list-style-type: none"> 1. 2% Blocking 2. 1% Blocking 3. 0.5% Blocking
Collocation – Average Response Time		<ol style="list-style-type: none"> 1. Virtual Initial 2. Virtual Augment 3. Physical Caged Initial 4. Physical Caged 45-Day Augment 5. Physical Caged 60-Day Augment 6. Physical Cageless Initial 7. Physical Cageless Augment 8. Remote
Collocation – Average Arrangement Time		<ol style="list-style-type: none"> 1. Virtual Initial 2. Virtual Augment 3. Physical Caged Initial 4. Physical Caged 45-Day Augment 5. Physical Caged 60-Day Augment 6. Physical Cageless Initial 7. Physical Cageless Augment 8. Remote
Collocation – Percent Due Dates Missed	All Collocation arrangements combined.	<ol style="list-style-type: none"> 1. Virtual Initial 2. Virtual Augment 3. Physical Caged Initial 4. Physical Caged 45-Day Augment 5. Physical Caged 6-Day Augment 6. Physical Cageless Initial 7. Physical Cageless Augment 8. Remote
Timeliness of Change Management Notice	All Combined	<ol style="list-style-type: none"> 1. Emergency 2. Regulatory Requirement 3. Industry Recommended – Major 4. Industry Recommend - Minor 5. CLEC Initiated 6. BellSouth Initiated
Change Management Notice Average Delay Days		<ol style="list-style-type: none"> 1. Emergency 2. Regulatory Requirement 3. Industry Recommended – Major 4. Industry Recommend - Minor 5. CLEC Initiated 6. BellSouth Initiated
Timeliness of Documents Associated	All Combined	<ol style="list-style-type: none"> 1. Emergency

With Change		<ol style="list-style-type: none"> 2. Regulatory Requirement 3. Industry Recommended – Major 4. Industry Recommend - Minor 5. CLEC Initiated 6. BellSouth Initiated
Change Management Documentation Average Delay Days		<ol style="list-style-type: none"> 1. Emergency 2. Regulatory Requirement 3. Industry Recommended – Major 4. Industry Recommend - Minor 5. CLEC Initiated 6. BellSouth Initiated
Notification of CLEC Interface Outages		<ol style="list-style-type: none"> 1. EDI 2. CSOTS 3. LENS 4. TAG 5. ECTA 6. TAFI
Percentage of BFR/NBR Requests Processed Within 30 Business Days		% BFR
Percentage of Quotes Provided for Authorized BFR/NBR Requests Processed Within X(10/30/60) Business Days		% BFR

ENFORCEMENT PLAN ATTRIBUTES

ATTRIBUTE	GA ORDER	CLEC RECOMMENDATION
Remedy Plan Effective Date	45 Days After Issuance of Order Remedy plan was initiated prior to 271 approval.	Prior to 271 approval
Remedy Accrual	Transaction-based	Measure-based. Measure-based would be more appropriate given CLEC small transaction volumes. Volumes are such that the remedy amounts would be too insignificant to motivate BellSouth to provide non-discriminatory support. Additionally, the SEEM transaction-based remedy calculation ¹² does not appropriately determine transactions subject to remedies.
Remedy Calculation	SEEM Remedy Calculation	Apply a basic quadratic equation.¹³ TIER I Parity Measures: $a(z/z^*)^2 + b(z/z^*) + c$ Benchmark Measures: $d[x/(100-B)]^2 + eB[x/(100-B)]^2 + f[B/(100-B)]^2 + g$ TIER II Parity Measures: $n [a(z/z^*)^2 + b(z/z^*) + c]$ Benchmark Measures: $n \{d[x/(100-B)]^2 + eB[x/(100-B)]^2 + f[B/(100-B)]^2 + g\}$
Test Statistic	Truncated Z	Modified Z
Parameter Delta Value for use with Balancing Critical Value	.35 for Tier II(CLEC Aggregate) .50 for Tier I(Individual CLEC)	.25 for Tier II(CLEC Aggregate) .25 for Tier I(Individual CLEC)
Cap	Absolute Cap of 44% of BellSouth's net revenues.	Procedural Cap
Tier II Remedies	Determined on a 3-month rolling basis.	Determined on a monthly basis.
Late Performance Reports Remedy	Pay to the state on a progressive scale as follows:	\$5000 to a state fund for every day past the due date for delivery of the reports and data. Liability based on latest report delivered to a

¹² Prior to their Staff Recommendation, the Florida Public Service Commission staff had conducted a workshop totally focused on remedy plan calculations. The Florida PSC Staff Recommendation commented on problems with SEEM's remedy calculation and the Florida PSC ordered a measure-based plan.

¹³ The quadratic formula provides flexibility to easily adjust the remedy amounts by only changing coefficients. Given that the remedy amount required to motivate BellSouth is really an unknown, a remedy calculation that can be easily adjusted is essential. Detailed description of calculation, including coefficients, n factor, modified z score and Balancing Critical Value, begin on page 8 of Exhibit CLB-1.

	1-7 days \$5000 8-15 days \$10,000 16-30 days \$40,000 31+ days \$5000 per day	CLEC.
Incomplete or Revised Reports	Pay to the state on a progressive scale as follows: 1-7 days \$5000 8-15 days \$10,000 16-30 days \$40,000 31+ days \$5000 per day	\$1000 to a state fund for every day past the due date for delivery of the reports and data.
Six-Month Review	YES	YES
Remedy Plan Subject to Modification	YES	YES