

DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

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1 **DISCUSSION OF PERFORMANCE MEASUREMENTS DATA**

2
3 **I. INTRODUCTION**

4
5 This Supplemental Exhibit presents BellSouth's performance measurements
6 data in Kentucky for November 2001. The performance data for Kentucky is
7 provided in Attachment 1F. In addition, Attachments 2 and 3 to Exhibit AJV-
8 6, filed originally on July 10, 2001, have been updated for November 2001
9 data and are attached to this supplemental exhibit as Attachments 2F and 3F.
10 Attachments 4, 5 and 6 to Exhibit AJV-6 have not been modified, and are,
11 therefore, not included in this supplemental exhibit.

12
13 **II. ANALYSIS OF PERFORMANCE MEASUREMENTS**

14
15 **A. Introduction**

16
17 Attachment 1F is the Monthly State Summary (MSS) for Kentucky for
18 November 2001. The November MSS, like the MSS for October, contains
19 2,338 sub-metrics. In November 2001, BellSouth met or exceeded the
20 comparison criteria for 597 of the 702 sub-metrics, or 85%, that had CLEC
21 activity and were compared to benchmarks or retail analogues. In October
22 2001, BellSouth met or exceeded the benchmark / retail analogue for 577 of

1 the 661 sub-metrics, or 87% that had CLEC activity, and in September 2001,
2 BellSouth met or exceeded the benchmark or retail analogue for 519 of the
3 574 sub-metrics, or 90%, that had CLEC activity.

4

5 As explained in previous updates to this Exhibit, three of the measures were
6 identified by BellSouth as having deficiencies in their calculations and were
7 investigated and evaluated for appropriate program code corrections. These
8 three measures were Average Jeopardy Notice Interval, FOC & Reject
9 Completeness (including the "Multiple Responses" sub-metrics), and LNP
10 Disconnect Timeliness. Program coding modifications have been completed
11 for the FOC and Reject Completeness measures and for the Average
12 Jeopardy Notice Interval measures, and the equity indications are now
13 included in the sub-metric counts for November. The LNP Disconnect
14 Timeliness measure is still being evaluated for significant design
15 modifications.

16

17 During the three-month period, September through November 2001, again
18 adjusting for the two measures mentioned above for September and October
19 data where appropriate, there were a total of 513 sub-metrics that had CLEC
20 activity for all three months and that were compared with either benchmarks
21 or retail analogues. Of these 513 sub-metrics, 462 sub-metrics (90%)
22 satisfied the comparison criteria in at least two of the three months.

1

2 Each sub-metric designated as having not satisfied the benchmark or
3 BellSouth retail analogue requirement for September, October and/or
4 November 2001 is included in this Exhibit. Each sub-metric discussed is
5 labeled as to what month(s) the missed criteria occurred
6 (September/October/November).

7

8 The following paragraphs will address specific performance measurements
9 associated with each checklist item.

10

11

B. CHECKLIST ITEM 1 – INTERCONNECTION

12

1. Collocation

13
14 BellSouth provides three separate collocation reports: 1) Average Response
15 Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.
16 Section E in Attachment 1F, Items E.1.1.1 through E.1.3.3, provides these
17 results. BellSouth met the approved benchmarks for all of the sub-metrics
18 with CLEC activity in September, October and November 2001.

19

2. Local Interconnection Trunking

20
21 Trunking Reports

1 Attachment 1F, Section C, Items C.1.1 to C.4.2 of the November MSS
2 contains data for ordering, provisioning, maintenance and repair, and billing
3 associated with Local Interconnection Trunks.

4

5 In September, October and November 2001, BellSouth met the
6 benchmarks/retail analogue comparisons for all 22, all 23 and 23 of the 25,
7 respectively, local interconnection trunking sub-metrics having CLEC activity.
8 The sub-metrics that did not meet the retail analogue comparison in
9 November 2001 are as follows:

10

11 Service Order Accuracy / Local Interconnection Trunks / < 10 Circuits / Non-
12 Dispatch (C.2.11.1.2) (November)

13 BellSouth met the standard criteria for 24 of the 26 service orders reviewed
14 for this sub-metric in November 2001. The 95% benchmark required that the
15 criteria be met for 25 of the 26 orders based on the number of orders in the
16 measurement. There was no CLEC activity for this sub-metric in either
17 September or October 2001.

18

19 Customer Trouble Report Rate / Local Interconnection Trunks / Non-Dispatch
20 (C.3.2.2) (November)

21 There were 25 troubles reported in November 2001 for the 12,192 lines in
22 service for this sub-metric. Of the 25 trouble reports, 24 were due to a single

1 incident where trunks were turned up with a programming error in the switch
2 that had to be corrected. Both the CLECs and BellSouth retail received
3 greater than 99.8% trouble free service for this sub-metric in November.
4 When BellSouth provisions high quality service coupled with very large
5 universe sizes, it can cause an apparent out of equity condition from a
6 quantitative viewpoint. In these cases, there is very little variation and the
7 universe size is so large that the Z-test becomes overly sensitive to any
8 difference. In other words, the statistical test shows that the measurement
9 does not meet the fixed critical value when compared with the retail analogue,
10 but BellSouth's actual performance for both CLECs and its own retail
11 operations is at a very high level – in this case over 99%. From a practical
12 point of view, the CLECs' ability to compete has not been hindered even
13 though the statistical results may technically show that BellSouth failed to
14 meet the benchmark/analogue. BellSouth met the benchmark for this sub-
15 metric in September and October 2001.

16 17 Trunk Blockage

18 BellSouth has developed a trunk blocking report that compares BellSouth
19 retail's trunk blockage rates to those of CLECs. The report, Trunk Group
20 Performance Report (TGP), Attachment 3F, displays trunk blocking in a
21 manner that accurately represents the customer experience. The TGP report
22 tabulates actual call blocking as a percentage of call attempts for all

1 comparable trunk groups administered by BellSouth that handle CLEC and
2 BellSouth traffic. The TGP report provides a direct comparison of hour-by-
3 hour blocking between CLEC and BellSouth trunk groups. Attachment 3F,
4 Item C.5.1 (TGP), shows the actual trunk blocking percentages by hour for
5 November 2001. The Analogue/Benchmark for the Trunk Group
6 Performance measure is any consecutive two-hour period in 24 hours where
7 CLEC blockage exceeds BellSouth blockage by more than 0.5%. BellSouth
8 met or exceeded the retail analogue for this sub-metric in September,
9 October and November 2001.

10
11 **C. CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)**

12
13 This section addresses the measures associated with UNEs under checklist
14 item 2. Attachment 1F, Sections B1 – B3, provides data that is divided into
15 Ordering, Provisioning and Maintenance & Repair operations. The Ordering
16 function is disaggregated into 17 sub-metrics. The Provisioning function has
17 19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair
18 function. All Ordering measures will be included in this checklist item
19 because of the overall relationship of the mechanized, partially mechanized
20 and manual processing of Local Service Requests (LSRs). The Provisioning
21 and Maintenance & Repair measures for the following products are included
22 in the checklist item as shown below:

1	<u>Product</u>	<u>Checklist Item:</u>
2	Combo (Loop & Port)	#2 – Unbundled Network Elements
3	Combo (Other)	#2 – Unbundled Network Elements
4	Other Design	#2 – Unbundled Network Elements
5	Other Non-Design	#2 – Unbundled Network Elements
6	xDSL Loop	#4 – Unbundled Local Loops
7	UNE ISDN Loop	#4 – Unbundled Local Loops
8	Line Sharing	#4 – Unbundled Local Loops
9	2w Analog Loop Design	#4 – Unbundled Local Loops
10	2w Analog Loop Non Design	#4 – Unbundled Local Loops
11	2w Analog Loop w/INP Design	#4 – Unbundled Local Loops
12	2w Analog Loop w/INP Non Design	#4 – Unbundled Local Loops
13	2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
14	2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops
15	Digital Loop < DS1	#4 – Unbundled Local Loops
16	Digital Loop => DS1	#4 – Unbundled Local Loops
17	Local Interoffice Transport	#5 – Unbundled Local Transport
18	Switch Ports	#6 – Unbundled Local Switching
19	INP Standalone	#11 – Local Number Portability
20	LNP Standalone	#11 – Local Number Portability
21		

1 An overall review of the UNE sub-metrics for Ordering, Provisioning,
2 Maintenance & Repair and Billing indicates that BellSouth met the
3 benchmark/analogue for 86% of the sub-metrics during November, 90% of
4 the sub-metrics in October and 91% of the sub-metrics in September 2001.

5

6 During the three-month period from September through November 2001,
7 there were 242 UNE sub-metrics that had data for all three months and were
8 compared to benchmarks or retail analogues. Of those 242 sub-metrics, 222
9 (92%) sub-metrics met the relevant criteria in at least two of the three months.

10

11 **1. UNE Ordering Measures**

12

13 Items B.1.1 – B.1.19 in Attachment 1F show data for Percent Rejected
14 Service Requests, Reject Interval, FOC Timeliness and FOC & Reject
15 Response Completeness. These reports are disaggregated by interface type
16 (electronic, partial electronic and manual), as well as product type.

17

18 **Reject Interval**

19 Items B.1.4 - B.1.8 in Attachment 1F examine the Reject Interval for the
20 month of November 2001. For orders submitted electronically, the benchmark
21 is 97% within one hour. In September and October 2001, 94% and 89%,
22 respectively, of the rejected service requests were delivered within the one-

1 hour time period. In November 2001, 79% of rejected UNE electronic LSRs
2 were returned within the one-hour benchmark.

3
4 For partially mechanized orders, the benchmark is 85% within 10 hours.
5 BellSouth exceeded the benchmark in September, October and November
6 with 97%, 95% and 95%, respectively, of rejects for partially mechanized
7 orders returned within the 10-hour period.

8
9 For manual orders, the current benchmark is 85% within 24 hours. BellSouth
10 also exceeded this requirement, with 98%, 98% and 99% of the LSRs
11 submitted manually being returned to the CLECs within the 24-hour time
12 period in September, October and November 2001, respectively.

13
14 The following sub-metrics did not meet the established benchmarks in
15 September, October and/or November 2001:

16
17 Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3)
18 (September/October/November)

19 BellSouth is conducting a detailed root cause analysis of the process for
20 electronic rejects. This analysis addresses the ordering systems (EDI, TAG,
21 and LENS) used by the CLECs and the back-end legacy applications, such
22 as SOCS, that are accessed by the ordering systems.

1

2 Thus far, the analysis has determined that many of the LSRs that did not
3 meet the one-hour benchmark in September were issued between 11:00 p.m.
4 and 4:30 a.m. Between these hours, the system is unable to process LSRs
5 because certain of the back-end legacy systems are out of service. LSRs
6 submitted during these periods should have been excluded from the
7 measurement. BellSouth implemented a program coding change in
8 September to exclude these LSRs from this measure.

9

10 With the implementation of May data, BellSouth was directed to change the
11 time stamp identification for the start and complete times of the interval for
12 this measurement from the Local Exchange Ordering (LEO) System to the
13 CLEC ordering interface system (TAG or EDI). However, with this change,
14 BellSouth is currently unable to identify multiple issues of the same version of
15 LSRs that have been rejected (fatal rejects). These rejected LSRs should be
16 excluded from the measurement. If there are multiple issues of the same
17 version, the measure currently calculates the interval from the initial issue to
18 the final issue of the LSR returned to the CLEC, Reject or FOC.
19 Consequently, BellSouth's performance level is inappropriately understated.
20 BellSouth is currently working to determine a fix for this issue.

21

22 Reject Interval / Line Sharing / Electronic (B.1.4.7) (October/November)

1 There were only six orders for this sub-metric in both October and November
2 2001. Such a small universe for this sub-metric does not provide a
3 conclusive benchmark comparison. There were no rejected LSRs for this
4 sub-metric in September 2001.

5

6 Reject Interval / 2w Analog Loop Design / (B.1.4.8) (September/October)

7 There were only two rejected LSRs for this sub-metric for September and ten
8 rejected LSRs in October 2001. Such a small universe for this sub-metric
9 does not provide a conclusive benchmark comparison. BellSouth met the
10 retail analogue comparison for this sub-metric in November 2001.

11

12 Reject Interval / Other Design / Electronic (B.1.4.14)

13 (September/October/November)

14 There were only eight rejected LSRs for this sub-metric in September, only
15 nine rejected LSRs in October and only eight rejected LSRs in November
16 2001. Such a small universe for this sub-metric does not provide a
17 conclusive benchmark comparison.

18

19 Reject Interval / Other Non-Design / Electronic (B.1.4.15)

20 (October/November)

21 BellSouth has been directed to change the time stamp identification for the
22 start and complete times of the interval for this measurement from the Local

1 Exchange Ordering (LEO) System to the CLEC ordering interface system
2 (TAG or EDI). However, with this change, BellSouth is currently unable to
3 identify multiple issues of the same version of LSRs that have been rejected
4 (fatal rejects). These rejected LSRs should be excluded from the
5 measurement. If there are multiple issues of the same version, the measure
6 currently calculates the interval from the initial issue to the final issue of the
7 LSR returned to the CLEC, Reject or FOC. Consequently, BellSouth's
8 performance level is inappropriately understated. BellSouth is currently
9 working to determine a fix for this issue. BellSouth met the benchmark for
10 this sub-metric in September 2001.

11
12 Reject Interval / LNP (Standalone) / Electronic (B.1.4.17)

13 (September/November)

14 BellSouth met the one-hour benchmark for 14 of the 16 LSRs rejected in this
15 sub-metric for September and for 45 of the 50 LSRs in November 2001. The
16 97% benchmark required that all 14 LSRs in September and 49 of the 50
17 LSRs for November be returned within the 1-hour period. BellSouth met the
18 benchmark for this sub-metric in October 2001.

19
20 Reject Interval / Line Sharing / Partially Mechanized (B.1.7.7)

21 (October/November)

1 BellSouth met the 10-hour benchmark interval for 10 of the 12 rejected LSRs
2 for this sub-metric in October 2001. The 85% benchmark required that 11 of
3 the 12 orders be returned. There were only 6 LSRs rejected for this sub-
4 metric in November 2001. The small universe of orders during the month
5 does not provide a conclusive benchmark comparison. There were no CLEC
6 LSRs rejected for this sub-metric in September.

7

8 Reject Interval / 2w Analog Loop w/LNP Design / Partially Mechanized
9 (B.1.7.12) (September/October/November)

10 There were only three rejected LSRs for this sub-metric in September, seven
11 rejected LSRs in October and four rejected LSRs in November 2001. Such a
12 small universe for this sub-metric does not provide a conclusive benchmark
13 comparison.

14

15 Reject Interval / Other Design / Partially Mechanized (B.1.7.14) (October)

16 BellSouth met the 10-hour benchmark interval for 10 of the 12 rejected LSRs
17 for this sub-metric in October 2001. The 85% benchmark required that 11 of
18 the 12 orders be returned. BellSouth met the benchmark comparison for this
19 sub-metric in September and November 2001.

20

21 Reject Interval / xDSL / Manual (B.1.8.5) (September)

1 There were only five orders in this sub-metric for September 2001. Such a
2 small universe does not produce a statistically conclusive benchmark
3 comparison. BellSouth met the benchmark comparison for this sub-metric in
4 October and November 2001.

5

6 Reject Interval / UNE ISDN / Manual (B.1.8.6) (November)

7 There were only six LSRs rejected for this sub-metric in November 2001.
8 Such a small universe does not produce a statistically conclusive benchmark
9 comparison. BellSouth met the benchmark comparison for this sub-metric in
10 September and October 2001.

11

12 FOC Timeliness

13 For LSRs submitted electronically, the benchmark is 95% of the FOCs
14 returned within 3 hours. In September, October and November 2001,
15 BellSouth returned 99%, 98% and 96%, respectively, of FOCs for
16 electronically submitted LSRs within the 3-hour benchmark interval. For
17 partially mechanized LSRs, the benchmark is 85% returned within 10 hours.
18 BellSouth met the 10-hour benchmark in September, October and November,
19 with 97% of the FOCs returned for partially mechanized LSRs returned within
20 the 10-hour benchmark period in each month. For LSRs submitted manually,
21 the benchmark is 85% returned within 36 hours. In September, October and
22 November 2001, BellSouth returned 99%, 96% and 98%, respectively, of the

1 FOCs for manually submitted UNE LSRs within the 36-hour window. The
2 sub-metrics that did not meet the benchmark in September, October and/or
3 November are as follows:

4

5 FOC Timeliness / xDSL / Electronic (B.1.9.5) (September)

6 BellSouth is conducting a detailed root cause analysis of the process for
7 FOCs for electronic LSRs. This analysis addresses the ordering systems
8 (EDI, TAG, and LENS) used by the CLECs and the back-end legacy
9 applications, such as SOCS, that are accessed by the ordering systems.

10

11 Thus far, the analysis has determined that many of the LSRs that did not
12 meet the three-hour benchmark were issued between 11:00 p.m. and 4:30
13 a.m. Between these hours, the system is unable to process LSRs because
14 certain of the back-end legacy systems are out of service. LSRs submitted
15 during these periods should be excluded from the measurement. BellSouth is
16 currently reviewing the scheduled down time for all systems and how that
17 down time affects the ordering capability of the CLECs. BellSouth met the
18 benchmark for this sub-metric in October and November 2001.

19

20 FOC Timeliness / LNP (Standalone) / Electronic (B.1.9.17) (November)

21 BellSouth met the 3-hour benchmark interval for 688 of the 788 FOCs
22 returned for this sub-metric in November 2001. BellSouth is currently

1 investigating apparent time-stamp discrepancies affecting some LSRs in this
2 sub-metric. BellSouth met the benchmark for this sub-metric in September
3 and October 2001.

4

5 FOC Timeliness / 2w Analog Loop Design / Partial Electronic (B.1.12.8)
6 (September)

7 There were only four LSRs associated with this sub-metric for September
8 2001. Such a small universe does not provide a conclusive benchmark
9 comparison. BellSouth met the benchmark for this sub-metric in October and
10 November 2001.

11

12 FOC Timeliness / 2w Analog Loop Non-Design / Partial Electronic (B.1.12.9)
13 (November)

14 There were only three LSRs associated with this sub-metric for November
15 2001. Such a small universe does not provide a conclusive benchmark
16 comparison. There was no CLEC activity for this sub-metric in September or
17 October 2001.

18

19 FOC Timeliness / 2w Analog Loop w/LNP Design / Partial Electronic
20 (B.1.12.12) (September/November)

21 There were only three LSRs associated with this sub-metric for September
22 and two LSRs in November 2001. Such a small universe does not provide a

1 conclusive benchmark comparison. BellSouth met the benchmark for this
2 sub-metric in October 2001.

3

4 FOC Timeliness / Other Design / Partial Electronic (B.1.12.14) (September)

5 There were only seven LSRs associated with this sub-metric in September
6 2001. Such a small universe does not provide a conclusive benchmark
7 comparison. BellSouth met the benchmark for this sub-metric in October and
8 November 2001.

9

10 FOC Timeliness / Other Non-Design / Partial Electronic (B.1.12.15)

11 (September/October)

12 There were only eleven LSRs associated with this sub-metric in September
13 2001. Such a small universe does not provide a conclusive benchmark
14 comparison. BellSouth met the 10-hour benchmark for 16 of the 19 FOCs
15 returned for this sub-metric in October 2001. This was only one order short of
16 the 17 orders required to be returned to meet the 85% benchmark. BellSouth
17 met the benchmark for this sub-metric in November 2001.

18

19 FOC Timeliness / Combo (Loop & Port) / Manual (B.1.13.3) (October)

20 BellSouth met the 36-hour benchmark interval for 52 of the 62 FOCs returned
21 for this sub-metric in October 2001. This was only one order short of the 53

1 orders required to be returned to meet the 85% benchmark. BellSouth met
2 the benchmark for this sub-metric in September and November 2001.

3
4 FOC & Reject Response Completeness and FOC & Reject Response

5 Completeness (Multiple Responses)

6 BellSouth determined that the coding for the FOC & Reject Completeness
7 and FOC & Reject Response Completeness (Multiple Responses) measures
8 failed to include rejections that were classified as "auto clarifications."
9 BellSouth has rewritten the code to correct this problem. Effective with the
10 Exhibit update for September data, the program coding was corrected for all
11 the FOC & Reject Completeness sub-metrics for Checklist Item No. 2, UNE
12 Loop products except for: xDSL, 2w Analog Loop w/INP Design, 2w Analog
13 Loop w/INP Non-Design, 2w Analog Loop w/LNP Design, 2w Analog Loop
14 w/LNP Non-Design, INP (Standalone) and LNP (Standalone). The corrected
15 coding for these measures was implemented and effective with the October
16 data. The individual sub-metrics with corrected coding that missed the
17 required benchmarks in September, October and/or November 2001 are
18 addressed separately following the next section. BellSouth did not meet the
19 benchmark in September 2001 for the FOC and Reject Response
20 Completeness and FOC & Reject Response Completeness (Multiple
21 Responses) metrics listed below:

22

- 1 FOC & Reject Response Completeness / xDSL / Electronic (B.1.14.5)
- 2 (September)
- 3 FOC & Reject Response Completeness / xDSL / Partial Electronic (B.1.15.5)
- 4 (September)
- 5 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
- 6 & Port) / Electronic (B.1.17.3) (September)
- 7 FOC & Reject Response Completeness (Multiple Responses) / Other Design
- 8 / Electronic (B.1.17.14) (September)
- 9 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
- 10 & Port) / Partial Electronic (B.1.18.3) (September)
- 11 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
- 12 Loop Design / Partial Electronic (B.1.18.8) (September)
- 13 FOC & Reject Response Completeness (Multiple Responses) / Other Design
- 14 / Partial Electronic (B.1.18.14) (September)
- 15 FOC & Reject Response Completeness (Multiple Responses) / Other Non-
- 16 Design / Partial Electronic (B.1.18.15) (September)
- 17 FOC & Reject Response Completeness (Multiple Responses) / UNE ISDN /
- 18 Manual (B.1.19.6) (September)
- 19 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /
- 20 Manual (B.1.19.7) (September)
- 21 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
- 22 Loop Design / Manual (B.1.19.8) (September)

1 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog

2 Loop Non Design / Manual (B.1.19.9) (September)

3 FOC & Reject Response Completeness (Multiple Responses) / Other Design

4 / Manual (B.1.19.14) (September)

5 BellSouth determined that the coding for the FOC & Reject Completeness
6 and FOC & Reject Response Completeness (Multiple Responses) measures
7 failed to include rejections that were classified as “auto clarifications.”
8 BellSouth has rewritten the code to correct this problem. The coding changes
9 were implemented for some products in August and for the remainder of the
10 products in September. The sub-metric “misses” listed above were for
11 operations prior to the implementation of the coding modifications.

12
13 Effective with October 2001 data, each sub-metric in the Electronic and
14 Partial Electronic sections have been disaggregated between LSRs submitted
15 from the EDI and TAG systems. The following FOC & Reject Response
16 Completeness sub-metrics, for which the program code has been corrected,
17 did not meet the benchmarks for September, October and/or November 2001:

18
19 FOC & Reject Response Completeness / xDSL / EDI / Electronic (B.1.14.5.1)

20 (November)

21 BellSouth met the standard criteria for 15 of the 16 responses for this sub-
22 metric in November 2001. With a 95% benchmark and a universe size of 16

1 orders, problems with even one response causes a miss for the entire sub-
2 metric. BellSouth met the benchmark for this sub-metric in October 2001.

3

4 FOC & Reject Response Completeness / xDSL / TAG / Electronic

5 (B.1.14.5.2) (November)

6 BellSouth met the standard criteria for 17 of the 22 responses for this sub-
7 metric in November 2001. The 95% benchmark required that 21 of the 22
8 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
9 October 2001.

10

11 FOC & Reject Response Completeness / Line Sharing / EDI / Electronic

12 (B.1.14.7.1) (November)

13 There was only one order for this sub-metric in November 2001. The small
14 universe size for this sub-metric does not provide a conclusive benchmark
15 comparison. There was no CLEC activity for this sub-metric in October 2001.

16

17 FOC & Reject Response Completeness / 2w Analog Loop Non-Design / TAG

18 / Electronic (B.1.14.9.2) (November)

19 There was only one order for this sub-metric in November 2001. The small
20 universe size for this sub-metric does not provide a conclusive benchmark
21 comparison. There was no CLEC activity for this sub-metric in October 2001.

22

1 FOC & Reject Response Completeness / Other Design / Electronic

2 (B.1.14.14) (September)

3 BellSouth met the benchmark standard for 18 of the 19 (94.74%) responses
4 for this sub-metric in September 2001. Normal rounding conventions would
5 indicate that this small difference is not significantly different from the 95%
6 benchmark level. With a universe size of only 19 orders and a 95%
7 benchmark, a problem with only one order causes a miss for the entire sub-
8 metric. This sub-metric has been disaggregated into Items B.1.14.14.1 and
9 B.1.14.14.2 beginning with October data.

10

11 FOC & Reject Response Completeness / xDSL / TAG / Partial Electronic

12 (B.1.15.5.2) (October)

13 There was only one order for this sub-metric in October 2001. The small
14 universe size for this sub-metric does not provide a conclusive benchmark
15 comparison. BellSouth met the benchmark for this sub-metric in November
16 2001.

17

18 FOC & Reject Response Completeness / Line Sharing / TAG / Partial

19 Electronic (B.1.15.7.2) (November)

20 BellSouth met the standard criteria for 12 of the 13 responses for this sub-
21 metric in November 2001. With a 95% benchmark and a universe size of 13

1 orders, problems with even one response causes a miss for the entire sub-
2 metric. BellSouth met the benchmark for this sub-metric in October 2001.

3

4 FOC & Reject Response Completeness / Combo (Loop & Port) / Manual
5 (B.1.16.3) (November)

6 BellSouth met the standard criteria for 114 of the 121 responses for this sub-
7 metric in November 2001. The 95% benchmark required that 115 of the 121
8 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
9 September and October 2001.

10

11 FOC & Reject Response Completeness / UNE ISDN / Manual (B.1.16.6)
12 (November)

13 BellSouth met the standard criteria for 35 of the 38 responses for this sub-
14 metric in November 2001. The 95% benchmark required that 37 of the 38
15 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
16 September and October 2001.

17

18 FOC & Reject Response Completeness / Line Sharing / Manual (B.1.16.7)
19 (September/November)

20 BellSouth met the benchmark standard for 52 of the 56 responses for this
21 sub-metric in September and for 36 of the 38 responses in November 2001.

22 The 95% benchmark required that 54 of the 56 orders in September and that

1 37 of the 38 orders in November meet the criteria. BellSouth continues to
2 focus on this measurement in order to improve results to meet the
3 benchmark. BellSouth met the benchmark for this sub-metric in October
4 2001.

5

6 FOC & Reject Response Completeness / 2w Analog Loop Non-Design /
7 Manual (B.1.16.9) (September/November)

8 BellSouth met the benchmark standard for 17 of the 18 (94.44%) responses
9 for this sub-metric in September 2001. With a universe size of only 18 orders
10 and a 95% benchmark, a problem with only one order causes a miss for the
11 entire sub-metric. BellSouth met the criteria for 27 of the 30 responses
12 returned in November 2001. BellSouth continues to focus on this
13 measurement in order to improve results to meet the benchmark. BellSouth
14 met the benchmark for this sub-metric in October 2001.

15

16 FOC & Reject Response Completeness / Other Non-Design / Manual
17 (B.1.16.15) (September/November)

18 BellSouth met the benchmark standard for 42 of the 45 responses for this
19 sub-metric in September and for 71 of the 78 responses returned in
20 November 2001. The 95% benchmark required that 43 of the 45 September
21 responses and 75 of the 78 November responses meet the standard criteria.
22 BellSouth continues to focus on this measurement in order to improve results

1 to meet the benchmark. BellSouth met the benchmark for this sub-metric in
2 October 2001.

3

4 FOC & Reject Response Completeness / INP (Standalone) / Manual

5 (B.1.16.16) (November)

6 There were only seven orders for this sub-metric in November 2001. The
7 small universe size for this sub-metric does not provide a conclusive
8 benchmark comparison. There was no CLEC activity for this sub-metric in
9 September 2001. BellSouth met the benchmark for this sub-metric in October
10 2001.

11

12 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
13 & Port) / EDI / Electronic (B.1.17.3.1) (October/November)

14 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
15 & Port) / TAG / Electronic (B.1.17.3.2) (October/November)

16 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /
17 EDI / Electronic (B.1.17.7.1) (November)

18 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /
19 TAG / Electronic (B.1.17.7.2) (November)

20 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
21 Loop Design / EDI / Electronic (B.1.17.8.1) (October)

- 1 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
2 Loop Non-Design / TAG / Electronic (B.1.17.9.2) (November)
3 FOC & Reject Response Completeness (Multiple Responses) / Other Design
4 / EDI / Electronic (B.1.17.14.1) (November)
5 FOC & Reject Response Completeness (Multiple Responses) / Other Design
6 / TAG / Electronic (B.1.17.14.2) (October)
7 FOC & Reject Response Completeness (Multiple Responses) / Other Non-
8 Design / EDI / Electronic (B.1.17.15.1) (October/November)

9 The due date calculator for some LSRs submitted electronically assigns due
10 dates that are longer than the established Order Completion Interval standard
11 benchmark intervals. In order to correctly apprise the CLECs of the correct
12 due dates for these orders and to ensure that the appropriate OCI intervals
13 are maintained, BellSouth is issuing multiple FOCs or reject notices. This
14 situation will be corrected when the coding for the due date calculator for
15 these orders is implemented.

- 16
17 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
18 & Port) / EDI / Partial Electronic (B.1.18.3.1) (October/November)

19 BellSouth met the standard for 32 of the 35 orders for this sub-metric in both
20 October and November 2001. The 95% benchmark required that 34 of the 35
21 orders meet the criteria in each month. BellSouth continues to focus on this
22 measurement in order to improve results to meet the benchmark.

1

2 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
3 & Port) / TAG / Partial Electronic (B.1.18.3.2) (October/November)

4 BellSouth met the standard for 1,213 of the 1,314 orders for this sub-metric in
5 October and for 904 of the 969 orders in November 2001. The 95%
6 benchmark required that 1,249 of the 1,314 orders in October and 921 of the
7 969 orders in November meet the criteria. BellSouth continues to focus on
8 this measurement in order to improve results to meet the benchmark.

9

10 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /
11 TAG / Partial Electronic (B.1.18.7.2) (October/November)

12 BellSouth met the standard for 17 of the 21 orders for this sub-metric in
13 October and for 7 of the 12 orders in November 2001. The 95% benchmark
14 required that 20 of the 21 orders in October and all 12 of 12 orders in
15 November meet the criteria. BellSouth continues to focus on this
16 measurement in order to improve results to meet the benchmark.

17

18 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
19 Loop w/LNP Design / EDI / Partial Electronic (B.1.18.12.1) (November)

20 There were only five orders for this sub-metric in November 2001. The small
21 universe of orders for this sub-metric does not provide a conclusive

1 benchmark comparison. BellSouth met the benchmark for this sub-metric in
2 October 2001.

3

4 FOC & Reject Response Completeness (Multiple Responses) / Other Design
5 / EDI / Partial Electronic (B.1.18.14.1) (November)

6 There were only four orders for this sub-metric in November 2001. The small
7 universe of orders for this sub-metric does not provide a conclusive
8 benchmark comparison. BellSouth met the benchmark for this sub-metric in
9 October 2001.

10

11 FOC & Reject Response Completeness (Multiple Responses) / Other Non-
12 Design / EDI / Partial Electronic (B.1.18.15.1) (October/November)

13 BellSouth met the standard for 15 of the 16 orders for this sub-metric in
14 October and for 63 of the 72 orders in November 2001. The 95% benchmark
15 required that all 16 of the 16 orders in October and 69 of the 72 orders for
16 November meet the criteria. BellSouth continues to focus on this
17 measurement in order to improve results to meet the benchmark.

18

19 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
20 & Port) / Manual (B.1.19.3) (October/November)

21 BellSouth met the standard for 94 of the 102 orders for this sub-metric in
22 October and for 106 of the 114 orders in November 2001. The 95%

1 benchmark required that 97 of the 102 orders in October and 109 of the 114
2 orders in November meet the criteria. BellSouth continues to focus on this
3 measurement in order to improve results to meet the benchmark.

4

5

6 FOC & Reject Response Completeness (Multiple Responses) / UNE ISDN /
7 Manual (B.1.19.6) (October)

8 BellSouth met the standard for 52 of the 55 orders for this sub-metric in
9 October 2001. The 95% benchmark required that 53 of the 55 orders meet
10 the criteria. Normal rounding convention indicates that there is no significant
11 difference between the October results for this sub-metric and the 95%
12 benchmark requirement. BellSouth continues to focus on this measurement
13 in order to improve results to meet the benchmark. BellSouth met the
14 benchmark for this sub-metric in November 2001.

15

16 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
17 Loop Non-Design / Manual (B.1.19.9) (October)

18 BellSouth met the standard for 13 of the 14 orders for this sub-metric in
19 October 2001. The 95% benchmark required that all 14 of the 14 orders meet
20 the criteria. BellSouth continues to focus on this measurement in order to
21 improve results to meet the benchmark. BellSouth met the benchmark for
22 this sub-metric in November 2001.

1

2 FOC & Reject Response Completeness (Multiple Responses) / LNP

3 (Standalone) / Manual (B.1.19.17) (November)

4 BellSouth met the standard for 91 of the 99 orders for this sub-metric in
5 November 2001. The 95% benchmark required that 95 of the 99 orders meet
6 the criteria. BellSouth continues to focus on this measurement in order to
7 improve results to meet the benchmark. BellSouth met the benchmark for
8 this sub-metric in September and October 2001.

9

10 Flow-Through

11 Attachment 1F, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated
12 by customer type and for the Summary/Aggregate. Detailed flow-through
13 results for individual CLECs are included in Attachment 2E. The following
14 table shows the Regional Flow-Through results for September, October and
15 November 2001 as compared with the Interim SQM benchmarks.

16

17 % Flow-through Service Requests (F.1.1.1 – F.1.3.4)

<u>Customer Type</u>	<u>September 2001</u>	<u>October 2001</u>	<u>November 2001</u>	<u>Benchmark</u>
Residence	90.39%	89.40%	89.40%	95%
Business	68.47%	70.17%	75.18%	90%
UNE	79.33%	76.74%	79.66%	85%
LNP	86.96%	86.96%	91.24%	85%

1

2 The table above excludes those LSRs designed to “fall out” for manual
3 handling. The business flow-through rate is well below the 90% objective.
4 Business LSRs are more complex than the typical LSRs and, as a result,
5 there is a greater probability for error. For example, an LSR requesting 10
6 lines with series completion hunting that are located over multiple floors and
7 have a variation of features on the lines presents many more opportunities for
8 system mismatches than one that adds just lines and features.

9

10 BellSouth has established a Flow-Through Improvement Program
11 Management process that includes seven different internal organizations.
12 Ongoing analysis is being done to determine trends and identify flow-through
13 problems. To date, fifteen system enhancements have been identified and
14 are targeted for Encore releases. Three of the enhancements were
15 implemented in August, five enhancements implemented in November and
16 two enhancements implemented in January 2002. The remainder of the
17 enhancements are scheduled for release during early 2002.

18

19 **2. UNE Provisioning Measures**

20 BellSouth met 94% of the overall UNE Provisioning measurements in
21 September, 95% in October and 96% in November 2001. The following sub-

1 metrics did not meet the applicable retail analogues in the months of
2 September, October and/or November 2001:

3

4 Held Orders / Combo (Loop & Port) / < 10 Circuits / Facility (B.2.3.3.1.1)
5 (September)

6 There were only two orders for this sub-metric in September 2001. Such a
7 small universe does not provide a statistically conclusive comparison to the
8 retail analogue. BellSouth met the retail analogue for this sub-metric in
9 October and November 2001.

10

11 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /
12 Dispatch (B.2.19.3.1.1) (November)

13 In November 2001, there were 13 total troubles reported for the 122 orders
14 completed in the prior 30 days. Six of the thirteen trouble reports were closed
15 as “no trouble found.” Excluding these reports, BellSouth would have met the
16 retail analogue comparison for the month. BellSouth met the retail analogue
17 comparisons for this sub-metric in September and October 2001.

18

19 Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch
20 (B.2.34.1.1.1) (September/October)

21 BellSouth met the standard for 32 of the 36 orders reviewed in this sub-metric
22 for September and for 9 of the 10 orders reviewed in October 2001. The 95%

1 benchmark set requirements of 35 and all 10 orders for the months of
2 September and October 2001, respectively, based on the monthly quantity of
3 orders for this sub-metric. BellSouth continues to focus on this measurement
4 in order to improve results to meet the benchmark. BellSouth met the
5 benchmark for this sub-metric in November 2001.

6

7 Service Order Accuracy / Design (Specials) / < 10 Circuits / Non-Dispatch
8 (B.2.34.1.1.2) (October)

9 There were only seven orders reviewed for this sub-metric for October 2001.
10 The small universe for this sub-metric does not provide a conclusive
11 benchmark comparison. BellSouth met the benchmark for this sub-metric in
12 September and November 2001.

13

14 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Non-Dispatch
15 (B.2.34.1.2.2) (October)

16 There were only two orders reviewed for this sub-metric in October 2001.
17 The small universe for this sub-metric does not provide a conclusive
18 benchmark comparison. There were no orders reviewed for this sub-metric in
19 either September or November 2001.

20

21 Service Order Accuracy / Loops Non-Design / < 10 Circuits / Dispatch
22 (B.2.34.2.1.1) (September)

1 There were only four orders reviewed for this sub-metric for September 2001.
2 The small universe for this sub-metric does not provide a conclusive
3 benchmark comparison. BellSouth met the benchmark for this sub-metric in
4 October and November 2001.

5

6 Service Order Accuracy / Loops Non-Design / < 10 Circuits / Non-Dispatch
7 (B.2.34.2.1.2) (November)

8 BellSouth met the standard criteria for 284 of the 300 orders reviewed for this
9 sub-metric in November 2001. This was only one order short of the 285
10 orders required by the 95% benchmark for the month of November 2001,
11 based on the number of orders reviewed for the sub-metric. BellSouth
12 continues to focus its efforts on meeting this measure. BellSouth met the
13 benchmark comparison for this sub-metric in September and October 2001.

14

15 Service Order Accuracy / Loops Non-Design / >= 10 Circuits / Non-Dispatch
16 (B.2.34.2.2.2) (November)

17 BellSouth met the standard for 49 of the 58 orders reviewed in this sub-metric
18 for November 2001. The 95% benchmark set a requirement of 56 orders for
19 the month, based on the quantity of orders for this sub-metric. BellSouth
20 continues to focus on this measurement in order to improve results to meet
21 the benchmark. There were no orders reviewed for this sub-metric in either
22 September or October 2001.

1

2 BellSouth met all other UNE provisioning measures for the sub-metrics
3 included in this checklist item for September, October and November 2001.

4

5 **3. UNE Maintenance and Repair (M&R) Measures**

6 BellSouth met the applicable performance standard for 98% for September,
7 96% for October and 91% for November 2001 of the overall UNE M&R
8 measurements. The UNE M&R sub-metrics that did not meet the fixed critical
9 value for this checklist item are as follows:

10

11 Customer Trouble Report Rate / Other Non-Design / Dispatch (B.3.2.11.1)
12 (October/November)

13 There were 12 trouble reports in October for the 269 lines in service for this
14 sub-metric and 10 trouble reports for the 256 lines in service in November
15 2001. Both the CLECs and BellSouth retail received over 95% trouble free
16 service for this sub-metric in both October and November 2001. BellSouth
17 met the retail analogue comparison for this sub-metric in September 2001.

18

19 Customer Trouble Report Rate / Other Non-Design / Non-Dispatch
20 (B.3.2.11.2) (September/October/November)

21 There were 8 troubles reported for the 272 lines in service for this sub-metric
22 in September, 6 troubles reported for the 269 lines in service in October and 6

1 troubles reported for the 256 lines in services in November 2001. Both the
2 CLECs and BellSouth retail had greater than 97% trouble free service for all
3 in service lines in this sub-metric in all three months.

4

5 Maintenance Average Duration / Combo (Loop & Port) / Non-Dispatch
6 (B.3.3.3.2) (November)

7 The average duration for the 105 repair orders for this sub-metric in
8 November was 8.39 hours as compared to the duration for the retail analogue
9 of 5.90 hours. Of the 105 repair orders, 73, or 70%, were closed as “no
10 trouble found.” Nine of the remaining troubles were due to one carrier system
11 failure that required 39 hours to repair (charged as 351 total hours for the 9
12 circuits). BellSouth met the retail analogue comparison for this sub-metric in
13 September and October 2001.

14

15 % Repeat Troubles within 30 Days / Combo Other / Dispatch (B.3.4.4.1)
16 (November)

17 There was only one order for this sub-metric in November 2001. The small
18 universe size for this sub-metric does not provide a statistically conclusive
19 comparison to the retail analogue. BellSouth met the retail analogue
20 comparison for this sub-metric in September and October 2001.

21

1 Out of Service > 24 Hours / Combo (Loop & Port) / Non-Dispatch (B.3.5.3.2)
2 (November)

3 Of the 43 service-affecting troubles reported in November, 11 were out of
4 service longer than 24 hours. Nine of the eleven troubles were due to one
5 carrier system failure that required 39 hours to repair. BellSouth met the retail
6 analogue comparison for this sub-metric in September and October 2001.

7

8 **4. Other UNE Measures**

9

10 **Pre-Ordering**

11 Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1) and
12 Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering
13 measurements. All measures met the established benchmarks for
14 September 2001. The measures that did not meet the benchmark for
15 October and/or November 2001 were:

16

17 Loop Makeup Inquiry / Manual (F.2.1) (October)

18 BellSouth returned 9 of the 10 manual loop makeup inquiry requests in less
19 than the 3 business day benchmark interval. Such a small universe of orders
20 for this sub-metric does not provide a conclusive benchmark comparison.
21 BellSouth met the benchmark comparison for this sub-metric in September
22 and November 2001.

1

2 Service Inquiry with Firm Order / xDSL (F.3.1.1) (November)

3 BellSouth returned 3 of the 4 service inquiry requests in less than the 5
4 business day benchmark interval in November 2001. Such a small universe
5 of orders for this sub-metric does not provide a conclusive benchmark
6 comparison. There was no CLEC activity for this sub-metric in either
7 September or October 2001.

8

9 **Operations Support Systems**

10 The OSS/Preordering measures for which BellSouth did not meet the
11 benchmark/retail analogue in September, October and/or November 2001
12 were:

13

14 Average Response Interval / COFFI / RNS / Region (D.1.3.6.1) (November)

15 Average Response Interval / COFFI / ROS / Region (D.1.3.6.2) (November)

16 The CLECs received slightly longer response times from this system in
17 November 2001 than for the retail analogue standard (6+ seconds average
18 for CLECS compared to 4+ to 5+ seconds for BellSouth). One November
19 transaction was reported as having a duration of approximately three days,
20 while the average for all the rest of the transactions was less than one
21 second. BellSouth is investigating the cause of the reported long duration

1 transaction. BellSouth met the retail analogue comparison for these sub-
2 metrics in September and October 2001.

3

4 Average Response Interval / CRIS / Region (D.2.4.1.1)

5 (September/October/November)

6 The average response interval for this sub-metric is measured in three
7 separate disaggregations -- the percentage of queries that are responded to
8 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

9 The average response interval for the CLEC requests did not meet the retail
10 analogue intervals for the less than 4-second disaggregation but exceeded
11 both the less than 10 and greater than 10 seconds responses. For the 4-
12 second interval, there was only approximately 1% difference between the
13 CLEC responses as compared with the retail analogue in all three months.
14 Both the CLECs and the retail analogue received approximately 99% within
15 the less than 10 second response interval. Similarly, for the greater than 10
16 seconds interval measure, the CLECs and the BellSouth retail analogue
17 received approximately 1% of responses in over 10 seconds. These very
18 small differences in response intervals indicate equivalent service levels for
19 the CLECs and BellSouth retail.

20

21 Average Response Interval / LMOS / Region (D.2.4.4.1, D.2.4.4.2, D.2.4.4.3)

22 (September/October/November)

1 The average response intervals for these sub-metrics are measured in three
2 separate disaggregations -- the percentage of queries that are responded to
3 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
4 For all three measurements, the results were virtually identical in September,
5 with all the measures being less than 1% apart. In October and November,
6 the difference in the less than 4-second interval responses was less than 2%,
7 while the differences in the less than 10-second and greater than 10-second
8 interval responses were less than 0.5%. These results indicate virtually
9 equivalent service levels for both the CLECs and BellSouth retail.

10

11 Average Response Interval / LMOSupd / Region (D.2.4.5.1, D.2.4.5.2,
12 D.2.4.5.3) (September/October/November)

13 The average response interval for this sub-metric is measured in three
14 separate disaggregations. The percentage of queries that are responded to
15 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
16 For each of the three sub-metrics, there was less than a 5% difference in the
17 responses received by the CLECs and BellSouth retail in each month.
18 Differences of about 5%, or less, for all of these intervals indicate virtually
19 equivalent service levels for both the CLECs and BellSouth retail.

20

21 Average Response Interval / LNP/ Region (D.2.4.6.1) (October/November)

1 Average Response Interval / LNP/ Region (D.2.4.6.2, D.2.4.6.3)

2 (September/November)

3 The average response interval for this measurement is measured in three
4 separate disaggregations -- the percentage of queries that are responded to
5 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

6 In October, the average response interval for the CLEC requests did not meet
7 the retail analogue intervals for the less than 4-second disaggregation but
8 exceeded both the less than 10 and greater than 10 seconds responses. In
9 September and October 2001, both the CLECs and BellSouth retail received
10 over 98.8% of responses in less than 4 seconds and less than 0.3% in more
11 than 10 seconds. The less than one percent difference for these intervals
12 indicates virtually equivalent service levels for the CLECs and BellSouth
13 retail.

14

15 Average Response Interval / MARCH / Region (D.2.4.7.1, D.2.4.7.2,
16 D.2.4.7.3) (November)

17 The average response interval for this sub-metric is measured in three
18 separate disaggregations -- the percentage of queries that are responded to
19 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

20 BellSouth missed the retail analogue comparison for this measure in
21 November but met the retail analogue comparison for these sub-metrics in
22 September and October 2001.

1

2 Average Response Interval / OSPCM / Region (D.2.4.8.2, D.2.4.8.3)

3 (September)

4 The average response interval for these sub-metrics is measured in three
5 separate disaggregations -- the percentage of queries that are responded to
6 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

7 In September 2001, the CLEC response interval was 44.19% within 4
8 seconds as compared to 42.76% for the retail analogue. For the less than 10
9 second response interval, the CLECs received 94.19% of their responses and
10 the retail analogue received 97.18% in September. For the greater than 10
11 second response interval, the CLECs received 5.81% of their responses and
12 the retail analogue received 2.82% in September. With activity levels of only
13 86 requests from this system for the month, only one to five additional
14 responses within 10 seconds would have brought the sub-metric into parity
15 with the retail analogue. BellSouth met the retail analogue comparison for all
16 three of these sub-metrics in October and November 2001.

17

18 Average Response Interval / NIW / Region (D.2.4.11.1) (October)

19 The average response interval for this sub-metric is measured in three
20 separate disaggregations -- the percentage of queries that are responded to
21 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

22 In October, the average response interval for the CLEC requests did not meet

1 the retail analogue intervals for the less than 4-second disaggregation but
2 exceeded both the less than 10 and greater than 10 seconds responses. The
3 CLEC response interval was 71.22% within 4 seconds in October, as
4 compared with 72.73% for the retail analogue. The small difference between
5 the CLEC and retail analogue results should not impede the CLECs' ability to
6 compete in this area. BellSouth met the retail analogue comparison for this
7 sub-metric in September and November 2001.

8

9 **General – Billing**

10 Usage Data Delivery Timeliness (F.9.2) (November)

11 This measure tracks the percentage of usage data delivered within six
12 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs
13 experienced usage data delivery timeliness rates that were slightly lower than
14 the rates for BellSouth customers during November 2001 (98.89% for
15 BellSouth compared to 98.37% for CLECs). The difference in performance
16 was the result of some input files being left out of the ADUF job before the
17 files were recovered and processed. It is important to point out that the CLEC
18 result of 98.37% still provides the CLECs a meaningful opportunity to
19 compete. BellSouth met the retail analogue comparison for this sub-metric in
20 September and October 2001.

21

22 Usage Data Delivery Completeness (F.9.3) (November)

1 This measure tracks the percentage of usage data delivered within thirty
2 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs
3 experienced usage data delivery timeliness rates that were slightly lower than
4 the rates for BellSouth customers during November 2001 (99.85% for
5 BellSouth compared to 99.54% for CLECs). The difference in performance
6 was the result of some input files being left out of the ADUF job before the
7 files were recovered and processed. It is important to point out that the CLEC
8 result of 99.54% still provides the CLECs a meaningful opportunity to
9 compete. BellSouth met the retail analogue comparison for this sub-metric in
10 September and October 2001.

11
12 Recurring Charge Completeness / UNE (F.9.5.2) (September)

13 This measure tracks the ability of the ordering and billing systems to begin
14 billing a CLEC recurring charges for UNE services on the next invoice after an
15 order has "completed". For UNE, the goal is to meet a benchmark of 90%.
16 The CLEC result for September 2001 was 86.44%. The benchmark was not
17 met in September because of problems encountered in correcting some
18 service order problems in a timely manner. The difference between the
19 benchmark and the CLEC result does not impair a CLEC's ability to support
20 its own end users or to effect billing to those end users in any meaningful
21 way. BellSouth met the benchmark for this sub-metric in October and
22 November 2001.

1

2 Recurring Charge Completeness / Interconnection (F.9.5.3)

3 (September/October)

4 In September and October 2001, the results for this measure were 31.94%
5 and 32.99%, respectively, against a benchmark of 90%. The results were
6 negatively impacted in both months by service orders issued to move billed
7 amounts from one billing account to another connected with CLECs which
8 have filed for bankruptcy. These orders were backdated several months to
9 the date of the bankruptcy. None of these orders impacted the CLECs' total
10 billed amounts but were issued to separate pre-bankruptcy billed amounts
11 from post-bankruptcy amounts. The CLECs are provided with a meaningful
12 opportunity to compete, as these issues do not impede the ability to serve
13 end users. BellSouth met the benchmark for this sub-metric in November
14 2001.

15

16 Non-Recurring Charge Completeness / Interconnection (F.9.6.3) (September)

17 This measure tracks the ability of the ordering and billing systems to begin
18 billing a CLEC non-recurring charges for local interconnection services on the
19 next invoice after an order has "completed". A benchmark of 90% has been
20 set as the level of performance to meet. In September 2001, BellSouth's
21 performance was 88.27%. The benchmark was not met because of problems
22 encountered in correcting some service order problems in a timely manner.

1 The difference between the benchmark and the CLEC results does not impair
2 a CLEC's ability to support its own end users or to effect billing to those end
3 users in any meaningful way. BellSouth met the benchmark for this sub-
4 metric in October and November 2001.

5

6 **General - Change Management**

7 % Software Release Notices Sent On Time (F.10.1) (October)

8 Average Software Release Notice Delay Days (F.10.2) (October)

9 BellSouth met the specified benchmark intervals for one of the two software
10 releases issued in October 2001. BellSouth met the benchmark intervals for
11 all releases in September and November 2001.

12

13 % Change Management Documentation Sent On Time (F.10.3) (November)

14 Average Documentation Release Delay Days (F.10.5) (November)

15 There was only one Change Management Documentation notice issued in
16 November 2001. This notice did not meet the standard notice interval. There
17 was no activity for these sub-metrics in September 2001. BellSouth met the
18 benchmark for these sub-metrics in October 2001.

19

20 **General – New Business Requests**

21 % Quotes Provided in 10 Business Days (F.11.2.1) (September)

1 There were only seven requests processed in September 2001 in sub-metric
2 F.11.2.1. Such a small universe does not provide a statistically conclusive
3 benchmark comparison. This is a regional measure and none of the
4 requests were processed in Kentucky. There was no CLEC activity in this
5 sub-metric in either October or November 2001.

6

7 **General – Ordering**

8 % Acknowledgement Message Completeness / EDI (F.12.2.1)

9 (September/October)

10 In September 2001, there were only 2 failed messages (0.003%) of the
11 67,850 total messages returned for the month, and there were only 18 failed
12 messages (0.02%) of the 87,896 total messages in October 2001. A Stability
13 Plan to improve EDI availability has been put into effect. This plan includes
14 implementing both a manual application monitoring schedule (24 / 7) and
15 increased mechanized application alarms to more adequately monitor and
16 react to application outages. The database parameters have also been
17 adjusted to allow for maximum processing in the EDI system. BellSouth met
18 the benchmark for this sub-metric in November 2001.

19

20 % Acknowledgement Message Completeness / TAG (F.12.2.2)

21 (September/October)

1 BellSouth failed to deliver 5 (0.003%) of the 167,159 messages in September
2 and 4 (0.002%) of the 195,248 messages in October 2001 for this sub-metric.
3 Analysis continues to identify any issues in this process. However, such a
4 small number of failed records have not revealed any systemic process
5 problems. BellSouth met the benchmark for this sub-metric in November
6 2001.

7

8 **D. CHECKLIST ITEM 4 – UNBUNDLED LOCAL LOOPS**

9 As discussed in Checklist Item 2, Sections B.2 and B.3 of Attachment 1F
10 provide data for provisioning and maintenance & repair measures for
11 unbundled local loops.

12

13 For purposes of discussion in this checklist item, the local loop sub-metrics
14 have been separated into two mode-of-entry groups, xDSL and
15 SL1/SL2/Digital. The xDSL group includes xDSL (ADSL, HDSL, UCL), ISDN
16 and Line Sharing sub-metrics. The SL1/SL2/Digital group includes the design
17 and non-design 2-wire analog loops, as well as the 2-wire and 4-wire digital
18 loop sub-metrics.

19

20 **xDSL Group**

21

22 **1. Provisioning Measures**

1 The provisioning sub-metrics that did not meet the retail analogues in
2 September, October and/or November are as follows:

3

4 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits /

5 Dispatch (B.2.19.7.1.1) (November)

6 There were only two orders for this sub-metric in November 2001. The small
7 universe of orders for this sub-metric does not provide a statistically
8 conclusive comparison to the retail analogue. BellSouth met the retail
9 analogue for this sub-metric in September and October 2001.

10

11 **2. Maintenance & Repair Measures**

12

13 Customer Trouble Report Rate / xDSL Loops / Dispatch (B.3.2.5.1) (October)

14 There were only 6 trouble reports for the 359 lines in service for this sub-
15 metric in October 2001. Both the CLECs and BellSouth retail had greater
16 than 98% trouble free service for all in service lines in this sub-metric in
17 October. BellSouth met the retail analogue for this sub-metric in September
18 and November 2001.

19

20 Customer Trouble Report Rate / UNE ISDN / Dispatch (B.3.2.6.1)

21 (November)

1 The CLEC aggregate reported 20 troubles for the 578 lines in service for this
2 sub-metric in November 2001. Both the CLECs and BellSouth retail had
3 greater than 96% trouble free service for all in service lines in this sub-metric
4 in November. BellSouth met the retail analogue for this sub-metric in
5 September and October 2001.

6

7 Customer Trouble Report Rate / Line Sharing / Non-Dispatch (B.3.2.7.2)
8 (October/November)

9 The CLEC aggregate reported 10 troubles for this sub-metric in October and
10 21 troubles in November 2001. All of the trouble reports in both months were
11 issued by one CLEC, and 9 of the 10 reports from October and 14 of the 21
12 reports for November were closed as “no trouble found.” BellSouth met the
13 retail analogue comparison for this sub-metric in September 2001.

14

15 Maintenance Average Duration / UNE ISDN / Non-Dispatch (B.3.3.6.2)
16 (September)

17 There were only a total of two troubles reported for this sub-metric in
18 September 2001. Such a small universe does not produce a statistically
19 conclusive comparison with the retail analogue. BellSouth met the retail
20 analogue comparison for this sub-metric in October and November 2001.

21

1 % Repeat Troubles within 30 Days / UNE ISDN / Non-Dispatch (B.3.4.6.2)
2 (November)

3 There were only two trouble reports for this sub-metric in November 2001.
4 The small universe of orders for this sub-metric does not provide a statistically
5 conclusive comparison to the retail analogue. BellSouth met the retail
6 analogue comparison for this sub-metric in September and October 2001.

7

8 Out of Service > 24 Hours / Line Sharing / Non-Dispatch (B.3.5.7.2)
9 (November)

10 There were only two “out of service” trouble reports for this sub-metric in
11 November 2001. The small universe of orders for this sub-metric does not
12 provide a statistically conclusive comparison to the retail analogue. BellSouth
13 met the retail analogue comparison for this sub-metric in September and
14 October 2001.

15

16 **SL1/SL2/Digital Loop Group**

17

18 BellSouth met the benchmarks/retail analogues for all maintenance & repair
19 sub-metrics for the SL1/SL2/Digital Loop Group in September, October and
20 November 2001. The provisioning sub-metrics that did not meet the retail
21 analogue for this group in September, October and/or November 2001 are:

22

1 % Jeopardies / Digital Loop >= DS1 / Electronic (B.2.5.19)
2 (September/October/November)

3 There were only 11 orders associated with this sub-metric in September, 7
4 orders in October and 7 orders in November 2001. Even though 6 of the 11
5 orders for September, 5 of the 7 orders for October and 5 of the 7 orders for
6 November were shown in jeopardy status, all but 1 of the September
7 jeopardies, all of the October jeopardies and all of the jeopardies for
8 November were resolved prior to the due dates and the orders were
9 completed as scheduled. The small universe size for this sub-metric does not
10 provide a statistically conclusive comparison to the retail analogue.

11

12 % Missed Installation Appointments / 2w Analog Loop Non-Design / < 10
13 Circuits / Dispatch (B.2.18.9.1.1) (November)

14 There were only six orders for this sub-metric in November 2001. The small
15 universe of orders for this sub-metric does not provide a statistically
16 conclusive comparison to the retail analogue. There was no CLEC activity for
17 this sub-metric in September or October 2001.

18

19 % Missed Installation Appointments / Digital Loops >= DS1 / < 10 Circuits /
20 Dispatch (B.2.18.19.1.1) (September)

21 There was only one missed appointment for the fourteen scheduled orders for
22 this sub-metric in September 2001. There was no systemic installation issue

1 for the missed appointment. BellSouth met the retail analogue for this sub-
2 metric in October and November 2001.

3

4 Average Completion Notice Interval / 2w Analog Loop Design / < 10 Circuits /
5 Dispatch (B.2.21.8.1.1) (September)

6 There were only 7 completions for this sub-metric in September 2001. The
7 small universe of orders for this sub-metric does not provide a statistically
8 conclusive comparison to the retail analogue. There was no CLEC activity for
9 this sub-metric in October 2001. BellSouth met the retail analogue
10 comparison for this sub-metric in November 2001.

11

12 **E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT**

13

14 The data in these measures indicate that BellSouth met the
15 benchmark/analogue requirements for all measurements in Checklist Item 5
16 for September, October and November 2001.

17

18

19 **F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING**

20

21 The data in these measures indicate that BellSouth met the
22 benchmark/analogue requirements for all measurements in Checklist Item 6
23 for September, October and November 2001.

1

2

G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES

3

H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR

4

SERVICES

5

6

As indicated in Attachment 1F, Sections F.6, F.7 and F.8, BellSouth met the benchmark/analogous requirements of Checklist Items 7a and 7b in September, October and November 2001. Even though BellSouth tracks and reports these measures, the processes used in providing these services are designed to provide parity for all users.

11

12

I. CHECKLIST ITEM 10 – ACCESS TO DATABASES AND ASSOCIATED

13

SIGNALING

14

BellSouth met the required benchmarks for two of the four sub-metrics associated with this checklist item in September, for three of the four sub-metrics in October and for all four of the four sub-metrics in November 2001.

17

See items F.13.1.1 through F.13.3 in Attachment 1F for further details. The sub-metrics that did not meet the appropriate benchmark in September and/or October 2001 are as follows:

20

21

% Update Accuracy / Directory Listings (F.13.2.2) (September)

1 The results in this sub-metric are based on a statistical sample of LSRs and
2 service orders, which are manually checked for the accuracy of information
3 that impacts the Directory Listings database. The September 2001 results
4 were based on a sample size of 34 orders, of which 4 orders were found to
5 contain errors. BellSouth has refocused its effort on all LSRs processed in
6 the partial mechanized and manual categories to eliminate basic errors made
7 by the representatives that should meet the benchmark for this sub-metric.
8 BellSouth met the benchmark for this sub-metric in October and November
9 2001.

10
11 % NXXs / LRNs Loaded by LERG Effective Date (Region) (F.13.3)
12 (September/October)

13 The measure indicated that 39 of 40 NXXs were loaded by their effective date
14 for the entire BellSouth region in September and 45 of 48 NXXs loaded by
15 their effective date in October 2001. This is a regional measure. In
16 September 2001, BellSouth Kentucky loaded 6 of 7 NXXs by their LERG
17 effective date. The one missed due date did not reveal any data base load
18 process issues. There were no missed dates in Kentucky for this sub-metric
19 in October or November 2001.

20
21 **J. CHECKLIST ITEM 11 – NUMBER PORTABILITY**

22

1 All the measurements in this Checklist Item were met or exceeded for
2 September, October and/or November 2001 except for the following:

3

4 Average Completion Notice Interval / LNP (Standalone) / < 10 Circuits / Non-
5 Dispatch (B.2.21.17.1.2) (September/October)

6 A root cause analysis of this measure uncovered a system coding problem in
7 the Barney data extract process. It is anticipated that this correction will be
8 implemented during November 2001. BellSouth met the retail analogue
9 comparison for this sub-metric in November 2001.

10

11 Disconnect Timeliness / LNP / < 10 Circuits (B.2.31)

12 The Disconnect Timeliness measure is supposed to track the time it takes to
13 disconnect a number in the central office switch after the message has been
14 received from the Local Number Portability (LNP) Gateway that it is ready.
15 However, this measurement does not track the relevant time to perform this
16 function.

17

18 On a great majority of LNP orders, BellSouth creates what is referred to as a
19 “trigger” in conjunction with the order. This trigger gives the end user
20 customer the ability to make and receive calls from other customers who are
21 served by the customer’s host switch at the time of the LNP activation. This
22 ability is not dependent upon BellSouth working a disconnect order in the

1 central office switch. In other words, when a trigger is involved, an end user
2 customer can receive calls from other customers served by the same host
3 switch before the disconnect order is ever worked.

4

5 As it currently exists, Performance Measure P-13 does not recognize the
6 importance of triggers and their effect on the LNP process. Rather, the
7 current measure calculates the end time of the LNP activity as the processing
8 of the actual disconnect order in the host switch, even though, from a
9 customer's perspective, this activity is totally meaningless on most LNP
10 orders. It is the activation of the LNP and the routing function accomplished
11 by the LSMS that ultimately determines whether the end user is back in full
12 service and is able to make and receive calls when a trigger is used in porting
13 a telephone number. So, while BellSouth may be missing this measure, the
14 actual impact on CLECs and their end users, for a great majority of the orders
15 is minimal, or nonexistent. The Georgia PSC is currently evaluating a change
16 in this measure that more accurately reflects the LNP process and its impacts
17 on end users, and, therefore, the measurements will be shown blank until a
18 resolution is reached on this issue.

19

20

K. CHECKLIST ITEM 14 – RESALE

21

1 BellSouth met or exceeded the benchmarks or retail analogues for 84% of the
2 Resale sub-metrics having CLEC activity in November 2001. In September
3 and October 2001, BellSouth met or exceeded the benchmarks/analogues for
4 90% and 82%, respectively, of the resale sub-metrics. The details for the
5 November data are delineated in Attachment 1F, Items A.1.1.1.1 through
6 A.4.2.

7

8 During the three-month period from September through November 2001,
9 there were 133 Resale sub-metrics that had data for all three months and
10 were compared to benchmarks or retail analogues. Of those 133 sub-
11 metrics, 119 (90%) sub-metrics met the relevant criteria in at least two of the
12 three months.

13

14 **1. Resale Ordering Measures**

15 **FOC Timeliness**

16 In September 2001, BellSouth returned FOCs for 6,912 Resale LSRs and met
17 the relevant benchmark on 99% of them. Of the 6,912 LSRs, 5,906 were fully
18 mechanized with 99.7% meeting the 3-hour benchmark. In October 2001,
19 BellSouth returned FOCs for 8,731 Resale LSRs and met the relevant
20 benchmark on 99% of all FOCs. Of the 8,731 LSRs, 7,304 were fully
21 mechanized with 99.8% meeting the 3-hour benchmark. In November 2001,
22 BellSouth returned FOCs for 7,692 Resale LSRs and met the relevant

1 benchmark on 99% of all FOCs. Of the 7,692 LSRs, 6,555 were fully
2 mechanized with 99.8% meeting the 3-hour benchmark. See Attachment 1F,
3 Sections A.1.9 through A.1.13 for further details.

4

5 **Reject Interval**

6 In September 2001, 1,086 LSRs were rejected, with 96% returned within the
7 relevant benchmark period. Of the LSRs rejected in September, 54% were
8 submitted electronically with 96% returned within the 1-hour benchmark. In
9 October 2001, 1,473 LSRs were rejected, with 95% returned within the
10 relevant benchmark period. Of the LSRs rejected in October, 50% were
11 submitted electronically with 95% returned within the 1-hour benchmark. In
12 November 2001, 1,291 LSRs were rejected, with 96% returned within the
13 relevant benchmark period. Of the LSRs rejected in November, 57% were
14 submitted electronically with 95% returned within the 1-hour benchmark. See
15 Attachment 1F, Items A.1.4 through A.1.8 for further details.

16

17 The Resale Ordering sub-metrics for which BellSouth did not meet the
18 benchmarks/analogues for September, October and/or November 2001 were:

19

20 Reject Interval / Residence / Electronic (A.1.4.1)

21 (September/October/November)

22 Reject Interval / Business / Electronic (A.1.4.2) (October/November)

1 The current benchmark for these two sub-metrics is $\geq 97\%$ within one hour.
2 BellSouth is conducting a detailed root cause analysis of the process for
3 electronic rejects. This analysis addresses the ordering systems (EDI, TAG,
4 and LENS) used by the CLECs and the back-end legacy applications, such
5 as SOCS, that are accessed by the ordering systems.

6
7 Thus far, the analysis has determined that many of the LSRs that did not
8 meet the one-hour benchmark in September were issued between 11:00 p.m.
9 and 4:30 a.m. Between these hours, the system is unable to process LSRs
10 because certain of the back-end legacy systems are out of service. LSRs
11 submitted during these periods should have been excluded from the
12 measurement. BellSouth implemented a program coding change in
13 September to exclude these LSRs from this measure.

14
15 With the implementation of May data, BellSouth was directed to change the
16 time stamp identification for the start and complete times of the interval for
17 this measurement from the Local Exchange Ordering (LEO) System to the
18 CLEC ordering interface system (TAG or EDI). However, with this change,
19 BellSouth is currently unable to identify multiple issues of the same version of
20 LSRs that have been rejected (fatal rejects). These rejected LSRs should be
21 excluded from the measurement. If there are multiple issues of the same
22 version, the measure currently calculates the interval from the initial issue to

1 the final issue of the LSR returned to the CLEC, Reject or FOC.
2 Consequently, BellSouth's performance level is inappropriately understated.
3 BellSouth is currently working to determine a fix for this issue.

4

5 Reject Interval / Design (Specials) / Electronic (A.1.4.3) (October/November)

6 There was only one rejected LSR for this sub-metric in October and two
7 rejected LSRs in November 2001. The small universe for this sub-metric
8 does not provide a conclusive benchmark comparison. There was no CLEC
9 activity for this sub-metric in September 2001.

10

11 Reject Interval / PBX / Manual (A.1.8.4) (October)

12 There were only 6 orders associated with this sub-metric in October 2001.
13 Such a small universe does not provide a conclusive benchmark comparison.
14 BellSouth met the benchmark comparison for this sub-metric in September
15 and November 2001.

16

17 FOC Timeliness / Design (Specials) / Partial Electronic (A.1.12.3) (October)

18 There was only one LSR associated with this sub-metric in October 2001.
19 The small universe of orders for this sub-metric does not provide a conclusive
20 benchmark comparison. BellSouth met the benchmark comparison for this
21 sub-metric in September 2001. There was no CLEC activity for this sub-
22 metric in November 2001.

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FOC Timeliness / PBX) / Partial Electronic (A.1.12.4) (October/November)

There were only two LSRs associated with this sub-metric in October and two LSRs in November 2001. The small universe of orders for this sub-metric does not provide a conclusive benchmark comparison. There was no CLEC activity for this sub-metric in September 2001.

FOC Timeliness / PBX / Manual (A.1.13.4) (October)

There were only 8 orders associated with this sub-metric in October 2001. Such a small universe does not provide a conclusive benchmark comparison. BellSouth met the benchmark comparison for this sub-metric in September and November 2001.

FOC Timeliness / ISDN / Manual (A.1.13.6) (October/November)

There were only 4 FOCs returned for this sub-metric in October and 12 FOCs returned in November 2001. Such a small universe does not produce a conclusive benchmark comparison. BellSouth met or exceeded the benchmark for this sub-metric in September 2001.

FOC & Reject Response Completeness and FOC & Reject Response Completeness (Multiple Responses) Measurements

1 Effective with October 2001 data, each sub-metric in the Electronic and
2 Partial Electronic sections have been disaggregated between LSRs submitted
3 from the EDI and TAG systems. The following FOC & Reject Response
4 Completeness sub-metrics did not meet the benchmarks for September,
5 October and/or November 2001:

6

7 FOC Reject & Response Completeness / Design (Specials) / TAG / Electronic
8 (A.1.14.3.2) (November)

9 There were only three orders for this sub-metric in November 2001. The
10 small universe of orders for this sub-metric does not provide a conclusive
11 benchmark comparison. BellSouth met the benchmark for this sub-metric in
12 October 2001.

13

14 FOC Reject & Response Completeness / Business / Partial Electronic
15 (A.1.15.2) (September)

16 BellSouth met the benchmark standard for 181 of the 192 (94.27%)
17 responses for this sub-metric in September 2001. This result was only two
18 responses short of meeting the benchmark for the sub-metric for the month.
19 This sub-metric was replaced by Items A.1.15.2.1 and A.1.15.2.2 effective
20 with October 2001 data.

21

1 FOC Reject & Response Completeness / Residence / Manual (A.1.16.1)

2 (October/November)

3 BellSouth met the benchmark standard for 132 of the 139 responses for this
4 sub-metric in October and for 125 of the 134 responses in November 2001.

5 The 95% benchmark required that 133 of the 139 responses for October and
6 128 of the 134 responses for November meet the criteria. BellSouth
7 continues to focus on this measurement in order to improve results to meet
8 the benchmark. BellSouth met the benchmark for this sub-metric in
9 September 2001.

10

11 FOC Reject & Response Completeness / Business / Manual (A.1.16.2)

12 (November)

13 BellSouth met the benchmark standard for 79 of the 84 responses for this
14 sub-metric in November 2001. The 95% benchmark required that 80 of the
15 84 responses meet the criteria. BellSouth continues to focus on this
16 measurement in order to improve results to meet the benchmark. BellSouth
17 met the benchmark for this sub-metric in September and October 2001.

18

19 FOC Reject & Response Completeness / Design (Specials) / Manual

20 (A.1.16.3) (October/November)

21 BellSouth met the benchmark standard for 23 of the 26 responses for this
22 sub-metric in October and for 41 of the 57 responses in November 2001.

1 The 95% benchmark required that 25 of the 26 responses in October and 55
2 of the 57 responses in November meet the criteria. BellSouth continues to
3 focus on this measurement in order to improve results to meet the
4 benchmark. BellSouth met the benchmark for this sub-metric in September
5 2001.

6

7 FOC Reject & Response Completeness / PBX / Manual (A.1.16.4)

8 (September/November)

9 BellSouth met the benchmark standard for 8 of the 11 responses for this sub-
10 metric in September and for 6 of the 8 responses in November 2001. With
11 universe sizes of only 11 and 8 orders and a 95% benchmark, a problem with
12 only one order causes a miss for the entire sub-metric. BellSouth continues
13 to focus on this measurement in order to improve results to meet the
14 benchmark. BellSouth met the benchmark for this sub-metric in October
15 2001.

16

17 FOC Reject & Response Completeness / ISDN / Manual (A.1.16.6)

18 (September/October)

19 BellSouth met the benchmark standard for 9 of the 10 responses for this sub-
20 metric in September and for 11 of the 12 responses in October 2001. With
21 universe sizes of only 10 or 12 orders and a 95% benchmark, a problem with
22 only one order causes a miss for the entire sub-metric. BellSouth continues

1 to focus on this measurement in order to improve results to meet the
2 benchmark. BellSouth met the benchmark for this sub-metric in November
3 2001.

4

5 FOC Reject & Response Completeness (Multiple Responses) / Residence /
6 EDI / Electronic (A.1.17.1.1) (October/November)

7 BellSouth met the benchmark standard for 393 of the 496 responses for this
8 sub-metric in October and for 258 of the 349 responses in November 2001.

9 The 95% benchmark required that 472 of the 496 responses for October and
10 332 of the 349 responses for November meet the criteria. BellSouth
11 continues to focus on this measurement in order to improve results to meet
12 the benchmark.

13

14 FOC Reject & Response Completeness (Multiple Responses) / Residence /
15 Partially Electronic (A.1.18.1) (September)

16 BellSouth met the benchmark standard for 875 of the 976 responses for this
17 sub-metric in September 2001. The 95% benchmark required that 928 of
18 the 976 orders meet the criteria. This sub-metric was replaced by Items
19 A.1.18.1.1 and A.1.18.1.2 effective with October 2001 data.

20

21 FOC Reject & Response Completeness (Multiple Responses) / Residence /
22 EDI / Partial Electronic (A.1.18.1.1) (October)

1 BellSouth met the benchmark standard for 151 of the 159 (94.97%)
2 responses for this sub-metric in October 2001. Under normal rounding
3 convention, there is no significant difference between the CLEC result for this
4 sub-metric and the benchmark criteria. BellSouth met the benchmark for this
5 sub-metric in November 2001.

6

7 FOC Reject & Response Completeness (Multiple Responses) / Residence /
8 TAG / Partial Electronic (A.1.18.1.2) (October/November)

9 BellSouth met the benchmark standard for 1,040 of the 1,150 responses for
10 this sub-metric in October and for 932 of the 1,019 responses in November
11 2001. The 95% benchmark required that 1,093 of the 1,150 responses for
12 October and 969 of the 1,019 responses for November meet the criteria.
13 BellSouth continues to focus on this measurement in order to improve results
14 to meet the benchmark.

15

16 FOC Reject & Response Completeness (Multiple Responses) / Business /
17 Partially Electronic (A.1.18.2) (September)

18 BellSouth met the benchmark standard for 164 of the 181 responses for this
19 sub-metric in September 2001. The 95% benchmark required that 172 of
20 the 181 orders meet the criteria. This sub-metric was replaced by Items
21 A.1.18.2.1 and A.1.18.2.2 effective with October 2001 data.

22

1 FOC Reject & Response Completeness (Multiple Responses) / Business /
2 EDI / Partial Electronic (A.1.18.2.1) (October)

3 There was only one order for this sub-metric in October 2001. The small
4 universe for this sub-metric does not provide a conclusive benchmark
5 comparison. There was no CLEC activity for this sub-metric in November
6 2001.

7
8 FOC Reject & Response Completeness (Multiple Responses) / Business /
9 TAG / Partial Electronic (A.1.18.2.2) (October/November)

10 BellSouth met the benchmark standard for 429 of the 473 responses for this
11 sub-metric in October and for 157 of the 188 responses for November 2001.
12 The 95% benchmark required that 450 of the 473 responses for October and
13 179 of the 188 responses in November meet the criteria. BellSouth continues
14 to focus on this measurement in order to improve results to meet the
15 benchmark.

16
17 FOC Reject & Response Completeness (Multiple Responses) / Design
18 (Specials) / Partially Electronic (A.1.18.3) (September)

19 There were only three orders associated with this sub-metric in September
20 2001. The small universe of orders for this sub-metric does not provide a
21 conclusive benchmark comparison. This sub-metric was replaced by Items
22 A.1.18.3.1 and A.1.18.3.2 effective with October 2001 data.

1

2 FOC Reject & Response Completeness (Multiple Responses) / PBX /
3 Partially Electronic (A.1.18.4) (September)

4 There was only one order associated with this sub-metric in September 2001.
5 The small universe of orders for this sub-metric does not provide a conclusive
6 benchmark comparison. This sub-metric was replaced by Items A.1.18.4.1
7 and A.1.18.4.2 effective with October 2001 data.

8

9 FOC Reject & Response Completeness (Multiple Responses) / Residence /
10 Manual (A.1.19.1) (September/October)

11 BellSouth met the benchmark standard for 102 of the 110 responses for this
12 sub-metric in September and for 118 of the 132 responses in October 2001.
13 The 95% benchmark required that 105 of the 110 responses in September
14 and 126 of the 132 responses in October meet the criteria. BellSouth
15 continues to focus on this measurement in order to improve results to meet
16 the benchmark. BellSouth met the benchmark for this sub-metric in
17 November 2001.

18

19 FOC Reject & Response Completeness (Multiple Responses) / Business /
20 Manual (A.1.19.2) (September/October/November)

21 BellSouth met the benchmark standard for 73 of the 79 responses for this
22 sub-metric in September, for 60 of the 71 responses in October and for 75 of

1 the 79 responses in November 2001. The 95% benchmark required that 76
2 of the 79 responses in September, 68 of the 71 responses in October and 76
3 of the 79 responses in November meet the criteria. BellSouth continues to
4 focus on this measurement in order to improve results to meet the
5 benchmark.

6

7 FOC Reject & Response Completeness (Multiple Responses) / Design
8 (Specials) / Manual (A.1.19.3) (September/November)

9 BellSouth met the benchmark standard for 19 of the 21 responses for this
10 sub-metric in September and for 37 of the 41 responses in November 2001.
11 The 95% benchmark required that 20 of the 21 responses in September and
12 39 of the 41 responses in November meet the criteria. BellSouth continues
13 to focus on this measurement in order to improve results to meet the
14 benchmark. BellSouth met the benchmark for this sub-metric in October
15 2001.

16

17 FOC Reject & Response Completeness (Multiple Responses) / PBX / Manual
18 (A.1.19.4) (October)

19 BellSouth met the benchmark standard for 10 of the 11 responses for this
20 sub-metric in October 2001. The 95% benchmark required that all 11 of the
21 11 orders meet the criteria. BellSouth continues to focus on this

1 measurement in order to improve results to meet the benchmark. BellSouth
2 met the benchmark for this sub-metric in September and November 2001.

3

4 FOC Reject & Response Completeness (Multiple Responses) / ISDN /
5 Manual (A.1.19.6) (November)

6 BellSouth met the benchmark standard for 13 of the 14 responses for this
7 sub-metric in November 2001. The 95% benchmark required that all 14 of
8 the 14 orders meet the criteria. BellSouth continues to focus on this
9 measurement in order to improve results to meet the benchmark. BellSouth
10 met the benchmark for this sub-metric in September and October 2001.

11

12 **2. Resale Provisioning Measures**

13 BellSouth met or exceeded the benchmark or retail analogue for 98% of all
14 Resale provisioning measures in September, 90% in October, and 91% in
15 November 2001. The details supporting the November percentage are
16 delineated in Items A.2.1.1.1.1 through A.2.25.3.2.2 of Attachment 1F.

17

18 Resale provisioning sub-metrics for which BellSouth did not meet the
19 benchmark/retail analogue in September, October and/or November 2001
20 were:

21

1 Order Completion Interval / PBX / >= 10 Circuits / Non-Dispatch (A.2.1.4.2.2)
2 (October)

3 There were only two orders for this sub-metric in October 2001. The small
4 universe of orders for this sub-metric does not provide a statistically
5 conclusive comparison to the retail analogue. There was no CLEC activity for
6 this sub-metric in either September or November 2001.

7

8 % Jeopardies / Residence / Electronic (A.2.4.1) (October)

9 BellSouth completed as scheduled over 99% of the installation appointments
10 for this sub-metric in October. There were no systemic installation issues
11 identified for the 21 orders placed in jeopardy status in October. None of the
12 jeopardies in this sub-metric resulted in held orders. BellSouth met the retail
13 analogue comparison for this sub-metric in September and November 2001.

14

15 % Provisioning Troubles within 30 Days / Residence / < 10 Circuits / Non-
16 Dispatch (A.2.12.1.1.2) (September/October/November)

17 For the period September through November 2001, less than 5% of the
18 orders completed for this sub-metric in the prior 30 days had trouble reports in
19 the following month. In September, over 22% of the trouble reports for this
20 sub-metric were closed as "TOK/FOK." In October, 44 of the 169 trouble
21 reports (26%) were closed as "TOK/FOK." In November, 49 of the 206
22 trouble reports (24%) were closed as "TOK/FOK." With a reduction in the

1 number of reports that end up as “no trouble found” incidents, this sub-metric
2 would meet the retail analogue comparison. Analysis of the troubles found for
3 this sub-metric revealed that a majority were related to cable and drop
4 facilities distributed throughout the state with no distinct pattern or trend.

5

6 % Provisioning Troubles within 30 Days / Business / < 10 Circuits / Dispatch

7 (A.2.12.2.1.1) (October)

8 In October 2001, there were a total of 4 troubles reported for the 52 orders
9 that completed in the prior 30 days. There was no systemic pattern to the
10 troubles reported in October. BellSouth met the retail analogue comparison
11 for this sub-metric in September and November 2001.

12

13 % Provisioning Troubles within 30 Days / PBX / < 10 Circuits / Non-Dispatch

14 (A.2.12.4.1.2) (November)

15 There were only three orders for this sub-metric in November 2001. The
16 small universe of orders for this sub-metric does not provide a statistically
17 conclusive comparison to the retail analogue. BellSouth met the retail
18 analogue comparison for this sub-metric in September and October 2001.

19

20 Service Order Accuracy / Residence / < 10 Circuits / Dispatch (A.2.25.1.1.1)

21 (October)

1 There were only five orders reviewed for this sub-metric in October 2001.
2 This small universe size does not provide a conclusive benchmark
3 comparison. BellSouth met the benchmark for this sub-metric in September
4 and November 2001.

5

6 Service Order Accuracy / Business / < 10 Circuits / Non-Dispatch
7 (A.2.25.2.1.2) (October)

8 BellSouth met the standard for 55 of the 60 orders reviewed in this sub-metric
9 for October 2001. The 95% benchmark set a requirement of 57 orders based
10 on the quantity of orders for this sub-metric. BellSouth continues to focus on
11 this measurement in order to improve results to meet the benchmark.
12 BellSouth met or exceeded the benchmark for this sub-metric in September
13 and November 2001.

14

15 Service Order Accuracy / Business / >= 10 Circuits / Dispatch (A.2.25.2.2.1)
16 (November)

17 BellSouth met the standard for 21 of the 23 orders reviewed in this sub-metric
18 for November 2001. The 95% benchmark set a requirement of 22 orders
19 based on the quantity of orders for this sub-metric. BellSouth continues to
20 focus on this measurement in order to improve results to meet the
21 benchmark. There was no CLEC activity for this sub-metric in either
22 September or October 2001.

1

2 Service Order Accuracy / Business / >= 10 Circuits / Non-Dispatch

3 (A.2.25.2.2.2) (November)

4 BellSouth met the standard for 29 of the 31 orders reviewed in this sub-metric
5 for November 2001. The 95% benchmark set a requirement of 30 orders
6 based on the quantity of orders for this sub-metric. BellSouth continues to
7 focus on this measurement in order to improve results to meet the
8 benchmark. There was no CLEC activity for this sub-metric in either
9 September or October 2001.

10

11 Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch

12 (A.2.25.3.1.1) (November)

13 BellSouth met the standard for 45 of the 50 orders reviewed in this sub-metric
14 for November 2001. The 95% benchmark set a requirement of 48 orders
15 based on the quantity of orders for this sub-metric. There was no CLEC
16 activity for this sub-metric in either September or October 2001.

17

18 Service Order Accuracy / Design (Specials) / < 10 Circuits / Non-Dispatch

19 (A.2.25.3.1.2) (October/November)

20 There was only one order reviewed for this sub-metric in October 2001. This
21 small universe size does not provide a conclusive benchmark comparison.

22 BellSouth met the standard for 52 of the 55 orders reviewed for this sub-

1 metric in November 2001. The 95% benchmark set a requirement of 53
2 orders based on the quantity of orders for this sub-metric. There was no
3 CLEC activity for this sub-metric in September 2001.

4
5 **3. Resale Maintenance and Repair (M&R) Measures**

6
7 BellSouth met the relevant retail analogue comparisons for 94% of all the
8 Resale Maintenance & Repair measurements in September, 89% in October
9 and 90% in November 2001. The sub-metrics for which BellSouth did not
10 meet the retail analogues in September, October and/or November 2001
11 were:

12
13 **% Missed Repair Appointments / Centrex / Dispatch (A.3.1.5.1) (October)**

14 BellSouth missed one of five repair appointments scheduled for this sub-
15 metric in October 2001. Such a small universe does not provide a statistically
16 conclusive comparison to the retail analogue. BellSouth met or exceeded the
17 retail analogue for this sub-metric in September and November 2001.

18
19 **Customer Trouble Report Rate / Residence / Dispatch (A.3.2.1.1)**
20 **(September/November)**

21 In both September and November 2001, the CLECs had over 97% trouble
22 free service for all the lines in service for this sub-metric. The trouble report

1 rate for CLECs for this sub-metric was approximately 0.4% higher than for the
2 retail analogue in September and 0.2% higher in November. In September
3 and November, 80 and 43, respectively, of the trouble reports were closed as
4 "TOK/FOK." Excluding these reports, the CLEC trouble report rate would
5 have been the same as, or less than for BellSouth retail. BellSouth met the
6 retail analogue comparison for this sub-metric in October 2001.

7

8 Customer Trouble Report Rate / PBX / Dispatch (A.3.2.4.1)
9 (September/November)

10 There were only 4 trouble reports for the 614 lines in service for this sub-
11 metric in September and 9 trouble reports for the 699 lines in service in
12 November 2001. In September, the 4 troubles involved only 2 lines. Both the
13 follow-up trouble reports were closed as "no trouble found." BellSouth
14 provided over 98% trouble free service for the in-service lines in this sub-
15 metric for both CLECs and BellSouth retail customers in both months. When
16 BellSouth provisions high quality service coupled with very large universe
17 sizes, it can cause an apparent out of equity condition from a quantitative
18 viewpoint. In these cases, there is very little variation and the universe size
19 is so large that the Z-test becomes overly sensitive to any difference. In other
20 words, the statistical test shows that the measurement does not meet the
21 fixed critical value when compared with the retail analogue, but BellSouth's
22 actual performance for both CLECs and its own retail operations is at a very

1 high level – often 98% or 99%. From a practical point of view, the CLECs'
2 ability to compete has not been hindered even though the statistical results
3 may technically show that BellSouth failed to meet the benchmark/analogue.
4 BellSouth met the retail analogue comparison for this sub-metric in October
5 2001.

6
7 Customer Trouble Report Rate / Centrex / Dispatch (A.3.2.5.1)
8 (September/October)

9 There were 13 trouble reports in September for the 582 lines in service for
10 this sub-metric and 5 trouble reports for the 572 lines in service in October
11 2001. In September, of the 13 troubles reported, 10 were at the same
12 customer location, and all were repaired in less than one hour. Of the 5
13 troubles reported for this sub-metric in October, 4 were closed as “no trouble
14 found.” BellSouth provided 97% and 99% trouble free service for both retail
15 and the CLECs for this sub-metric for the months of September and October,
16 respectively. From a practical point of view, the CLECs' ability to compete
17 has not been hindered even though the statistical results may technically
18 show that BellSouth failed to meet the benchmark/analogue.

19
20 Customer Trouble Report Rate / ISDN / Dispatch (A.3.2.6.1) (October)

21 There were only 3 trouble reports for the 598 lines in service for this sub-
22 metric in October 2001. BellSouth provided over 99% trouble free service for

1 both retail and the CLECs for this sub-metric in October. From a practical
2 point of view, the CLECs' ability to compete has not been hindered even
3 though the statistical results may technically show that BellSouth failed to
4 meet the benchmark/analogue. BellSouth met the retail analogue
5 comparison for this sub-metric in September and November 2001.

6

7 Maintenance Average Duration / Business / Dispatch (A.3.3.2.1) (November)

8 This measure was missed in November due to six trouble reports received
9 from one customer at one location. A BellSouth repair technician was
10 dispatched the following day but could not gain access to the premises. The
11 customer did not provide access until six days later. All six reports were
12 closed as "no trouble found." Excluding these six long duration but no trouble
13 found reports, BellSouth would have met the retail analogue comparison for
14 November. BellSouth met the retail analogue comparison for this sub-metric
15 in September and October 2001.

16

17

18 Maintenance Average Duration / PBX / Dispatch (A.3.3.4.1) (November)

19 There were only nine trouble reports for this sub-metric in November 2001.
20 The small universe for this measurement does not provide a statistically
21 conclusive comparison with the retail analogue. BellSouth met the retail
22 analogue comparison for this sub-metric in September and October 2001.

1

2 % Repeat Troubles within 30 days / Business / Dispatch (A.3.4.2.1) (October)

3 There were 24 repeat reports for the 99 total trouble reports for this sub-
4 metric in October 2001. Of the 24 repeat reports, 9 were closed as “no
5 trouble found.” Excluding these reports, the result would be lower for the
6 CLECs than for the retail analogue for the month. BellSouth met the retail
7 analogue for this sub-metric in September and November 2001.

8

9 % Repeat Troubles within 30 days / Business / Dispatch (A.3.4.2.2) (October)

10 There were 8 repeat reports for the 34 total trouble reports for this sub-metric
11 in October 2001. Of the 8 repeat reports, 6 were closed as “no trouble
12 found.” Excluding these reports, the result would be lower for the CLECs
13 than for the retail analogue for the month. BellSouth met the retail analogue
14 for this sub-metric in September and November 2001.

15

16 % Repeat Troubles within 30 days / PBX / Dispatch (A.3.4.4.1) (September)

17 There were only four trouble reports for this sub-metric in September 2001.
18 The small universe for this measurement does not provide a statistically
19 conclusive comparison with the retail analogue. BellSouth met or exceeded
20 the retail analogue for this sub-metric in October and November 2001.

21

1 % Repeat Troubles within 30 days / Centrex / Non-Dispatch (A.3.4.5.2)
2 (October)

3 There was only one trouble report for this sub-metric in October 2001. The
4 small universe for this measurement does not provide a statistically
5 conclusive comparison with the retail analogue. BellSouth met the retail
6 analogue comparison for this sub-metric in September and November 2001.

7

8 Out of Service > 24 Hours / Business / Dispatch (A.3.5.2.1) (November)

9 There were nine repair orders out of service longer than 24 hours for this sub-
10 metric in November 2001. As discussed in Item A.3.3.2.1, six of the nine
11 reports were dispatched is less than 24 hours, but the technician was unable
12 to gain access to the premises until six days later. Excluding these reports,
13 the result for the CLECs and BellSouth retail would have been virtually the
14 same for the month. BellSouth met the retail analogue for this sub-metric in
15 September and October 2001.

16

17 Out of Service > 24 Hours / PBX / Dispatch (A.3.5.4.1) (November)

18 There were only seven repair orders associated with this sub-metric in
19 November 2001. Such a small universe of orders for this sub-metric does not
20 provide a statistically conclusive comparison to the retail analogue. BellSouth
21 met the retail analogue comparison for this sub-metric in September and
22 October 2001.

1

2 Out of Service > 24 Hours / Centrex / Dispatch (A.3.5.5.1) (October)

3 There was one trouble report in this sub-metric that resulted in an out-of-
4 service condition for more than 24 hours in October 2001. Such a small
5 universe for this sub-metric does not provide a statistically conclusive
6 comparison to the retail analogue. BellSouth met the retail analogue
7 comparison for this sub-metric in September and November 2001.

8

9

III. Summary

10

11 As stated in the Introduction to the Analysis of Performance Measurements
12 section, BellSouth met or exceeded the benchmarks/retail analogues for 597
13 of the 702 sub-metrics (85%) for which there was CLEC activity in November
14 2001. In October 2001, 577 of 661 sub-metrics (87%) met or exceeded the
15 benchmarks or retail analogues. BellSouth met or exceeded the criteria for
16 519 of the 574 sub-metrics (90%) for which there was CLEC activity in
17 September 2001.

18

19 During the three-month period, September through November 2001,
20 excluding the measures with calculation problems, there were a total of 513
21 sub-metrics that had CLEC activity for all three months and that were
22 compared with either benchmarks or retail analogues. Of these 513 sub-

1 metrics, 462 sub-metrics (90%) satisfied the comparison criteria during at
2 least two of the three months.

3