

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

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

14
15 **A. Introduction**

16
17 Attachment 1G is the Monthly State Summary (MSS) for Kentucky for
18 December 2001. The December MSS contains 2,334 sub-metrics. In
19 December 2001, BellSouth met or exceeded the comparison criteria for 545
20 of the 616 sub-metrics, or 88%, that had CLEC activity and were compared to
21 benchmarks or retail analogues. The remainder (1,718) of the sub-metrics
22 were either diagnostic (916), had no CLEC activity (729), were parity by

1 design (10), are still under development, (2) were removed due to
2 computational problems or not relevant items as explained below (61).

3

4 As explained in previous updates to this Exhibit, three of the measures were
5 identified by BellSouth as having deficiencies in their calculations and were
6 investigated and evaluated for appropriate program code corrections. These
7 three measures were Average Jeopardy Notice Interval, FOC & Reject
8 Completeness (including the "Multiple Responses" sub-metrics), and LNP
9 Disconnect Timeliness. Program coding modifications have been completed
10 for the FOC and Reject Completeness measure. A variation on the FOC &
11 Reject Response Completeness (O-11) measurement, FOC/Reject
12 Completeness (Multiple Responses), indicates the proportion of times that
13 multiple FOCs/Rejects for an LSR are returned. The Georgia PSC did not
14 order this measure to be implemented. Also, this measurement can be
15 misleading because sometimes multiple responses are required for efficient
16 operation of the business, such as when a second FOC is returned to notify a
17 CLEC when a jeopardy was cleared. Consequently, while BellSouth reports
18 data on this measure in the Monthly State Summary, BellSouth has not
19 included it in the calculation of performance measurements that had CLEC
20 activity. Effective with October 2001 data, each sub-metric in the Electronic
21 and Partial Electronic sections of the FOC & Reject Response Completeness
22 measures have been disaggregated between LSRs submitted from the EDI

1 and TAG systems. Coding changes for the Average Jeopardy Notice Interval
2 measures are still being developed. The LNP Disconnect Timeliness
3 measure is still under review by the Georgia PSC. These measures are
4 included in the MSS and in the total number of measurements calculation
5 (2,338), but are excluded from the "Met/Total" (545/616) percentage
6 calculations.

7

8 During the three-month period, October through December 2001, again
9 adjusting for the measures mentioned above where appropriate, there were a
10 total of 537 sub-metrics that had CLEC activity for all three months and that
11 were compared with either benchmarks or retail analogues. Of these 537
12 sub-metrics, 490 sub-metrics (91%) satisfied the comparison criteria in at
13 least two of the three months.

14

15 Each sub-metric designated as having not satisfied the benchmark or
16 BellSouth retail analogue requirement for October, November and/or
17 December 2001 is included in this Exhibit. Each sub-metric discussed is
18 labeled as to what month(s) the missed criteria occurred
19 (October/November/December).

20

21 The following paragraphs will address specific performance measurements
22 associated with each checklist item.

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B. CHECKLIST ITEM 1 – INTERCONNECTION

1. Collocation

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

2. Local Interconnection Trunking

Trunking Reports

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

In October, November and December 2001, BellSouth met the benchmarks/retail analogue comparisons for all 23, 23 of the 25 and 18 of the 24, respectively, local interconnection trunking sub-metrics having CLEC activity. The sub-metrics that did not meet the retail analogue comparison in November and December 2001 are as follows:

1 FOC Timeliness / Local Interconnection Trunks (C.1.3) (December)

2 There were only seven orders for this sub-metric in December 2001. The
3 small universe of orders for this sub-metric does not provide a conclusive
4 benchmark comparison. BellSouth met or exceeded the benchmark for this
5 sub-metric in October and November 2001.

6

7 Order Completion Interval / Local Interconnection Trunks (C.2.1) (December)

8 There were only four orders for this sub-metric in December 2001. The small
9 universe of orders for this sub-metric does not provide a statistically
10 conclusive comparison to the retail analogue. BellSouth met or exceeded the
11 retail analogue comparison for this sub-metric in October and November
12 2001.

13

14 Average Completion Notice Interval / Local Interconnection Trunks (C.2.7)
15 (December)

16 There were only four orders for this sub-metric in December 2001. The small
17 universe of orders for this sub-metric does not provide a statistically
18 conclusive comparison to the retail analogue. BellSouth met or exceeded the
19 retail analogue comparison for this sub-metric in October and November
20 2001.

21

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

3 BellSouth met the standard criteria for 24 of the 26 service orders reviewed
4 for this sub-metric in November 2001. The 95% benchmark required that the
5 criteria be met for 25 of the 26 orders based on the number of orders in the
6 measurement. There was no CLEC activity for this sub-metric in October
7 2001. BellSouth met the benchmark for this sub-metric in December 2001.

8

9 Customer Trouble Report Rate / Local Interconnection Trunks / Dispatch
10 (C.3.2.1) (December)

11 There was only one trouble report for the 13,035 lines in service for this sub-
12 metric in December 2001, representing a trouble free service rate of over
13 99.99%. The one trouble report for December was incorrectly coded by the
14 BellSouth technician as “no trouble found.” The report should have been
15 coded “information only” and excluded from the measurement since the
16 CLEC reported an invalid telephone number. If coded appropriately,
17 BellSouth would have met the retail analogue comparison for this sub-metric
18 in December 2001. BellSouth met the benchmark for this sub-metric in
19 October and November 2001.

20

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

1 There were 25 troubles reported in November 2001 for the 12,192 lines in
2 service for this sub-metric. Of the 25 trouble reports, 24 were due to a single
3 incident where trunks were turned up with a programming error in the switch
4 that had to be corrected. Both the CLECs and BellSouth retail received
5 greater than 99.8% trouble free service for this sub-metric in November.
6 When BellSouth provisions high quality service coupled with very large
7 universe sizes, it can cause an apparent out of equity condition from a
8 quantitative viewpoint. In these cases, there is very little variation and the
9 universe size is so large that the Z-test becomes overly sensitive to any
10 difference. In other words, the statistical test shows that the measurement
11 does not meet the fixed critical value when compared with the retail analogue,
12 but BellSouth's actual performance for both CLECs and its own retail
13 operations is at a very high level – in this case over 99%. From a practical
14 point of view, the CLECs' ability to compete has not been hindered even
15 though the statistical results may technically show that BellSouth failed to
16 meet the benchmark/analogue. BellSouth met the benchmark for this sub-
17 metric in October and December 2001.

18
19 Maintenance Average Duration / Local Interconnection Trunks (C.3.3.1)
20 (December)

21 There was only one trouble report for this sub-metric in December 2001. The
22 one trouble report for December was incorrectly coded by the BellSouth

1 technician as “no trouble found.” The report should have been coded
2 “information only” and excluded from the measurement since the CLEC
3 reported an invalid telephone number. BellSouth spent 10.65 hours trying to
4 identify a nonexistent problem. If coded appropriately, BellSouth would have
5 met the retail analogue comparison for this sub-metric in December 2001.
6 BellSouth met or exceeded the retail analogue comparison for this sub-metric
7 in October and November 2001.

8

9 Mean Time to Deliver Invoices – CABS / Local Interconnection Trunks (C.4.2)

10 (December)

11 The CLECs experienced Interconnection invoice delivery rates that were
12 slightly higher than the rates for BellSouth’s retail customers during
13 December 2001 (4.85 days for BellSouth versus 4.97 days for CLECS). The
14 small difference in performance was the result of recent shifts in workloads
15 within the BellSouth Bill Distribution department. BellSouth will continue to
16 monitor results and will adjust procedures as necessary to further improve
17 this metric.

18

19 Trunk Blockage

20 BellSouth has developed a trunk blocking report that compares BellSouth
21 retail’s trunk blockage rates to those of CLECs. The report, Trunk Group
22 Performance Report (TGP), Attachment 3G, displays trunk blocking in a

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

12
13 **C. CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)**

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

1 and Maintenance & Repair measures for the following products are included

2 in the checklist item as shown below:

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

1

2 An overall review of the UNE sub-metrics for Ordering, Provisioning,
3 Maintenance & Repair and Billing indicates that BellSouth met the
4 benchmark/analogue for 93% of the sub-metrics during December, 86% of
5 the sub-metrics in November and 90% of the sub-metrics in October 2001.

6

7 During the three-month period from October through December 2001, there
8 were 260 UNE sub-metrics that had data for all three months and were
9 compared to benchmarks or retail analogues. Of those 260 sub-metrics, 245
10 (94%) sub-metrics met the relevant criteria in at least two of the three months.

11

12 **1. UNE Ordering Measures**

13

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

18

19 **Reject Interval**

20 Items B.1.4 - B.1.8 in Attachment 1G examine the Reject Interval for the
21 month of December 2001. For orders submitted electronically, the benchmark
22 is 97% within one hour. In October and November 2001, 89% and 79%,

1 respectively, of the rejected service requests were delivered within the one-
2 hour time period. In December 2001, 93% of rejected UNE electronic LSRs
3 were returned within the one-hour benchmark.

4
5 For partially mechanized orders, the benchmark is 85% within 10 hours.
6 BellSouth exceeded the benchmark in October, November and December
7 with 95% of rejects for partially mechanized orders returned within the 10-
8 hour period in each of the three months.

9
10 For manual orders, the current benchmark is 85% within 24 hours. BellSouth
11 also exceeded this requirement in each of the three months, with 98% of the
12 LSRs submitted manually being returned to the CLECs within the 24-hour
13 time period.

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

17
18 Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3)

19 (October/November/December)

20 The current benchmark for electronic rejects is \geq 97% within one hour.
21 BellSouth's root cause analysis determined that a number of LSRs that did
22 not meet the one-hour benchmark were submitted when back-end legacy

1 systems were out of service and were unable to process the LSRs. Because
2 such LSRs should be excluded from the measurement, BellSouth
3 implemented a coding change in PMAP to ensure that scheduled OSS
4 downtime was properly excluded. This change was made with September
5 2001 data and was expected to improve sub-metric results for Reject Interval
6 performance.

7

8 The coding change assumed that EDI and TAG timestamps reflected Eastern
9 Time. However, the timestamps used by EDI and TAG actually reflect
10 Central time. As a result of this discrepancy, an hour is being added during
11 PMAP timestamp "synchronization," which causes the results to inaccurately
12 reflect the reject Interval duration. A change to address this issue for EDI is
13 scheduled for implementation with February 2002 data, and BellSouth is in
14 the process of scheduling a similar change for TAG. BellSouth's root cause
15 analysis has determined that, had the scheduled OSS downtime exclusion
16 been properly implemented, BellSouth's Reject Interval performance would
17 generally have met the Commission's benchmark.

18

19 BellSouth's root cause analysis also identified an additional issue that impacts
20 the electronic Reject Interval sub-metrics. This issue arises when a fully
21 mechanized Firm Order Confirmation ("FOC") is followed by a manual
22 Clarification, a scenario that occurs when the Local Carrier Service Center

1 ("LCSC") must resolve specific types of errors after the issuance of the FOC.
2 This issue distorts the timeliness of BellSouth's electronic reject notices, and
3 BellSouth is currently analyzing this situation to determine an appropriate
4 solution.

5

6 Reject Interval / Line Sharing / Electronic (B.1.4.7)

7 (October/November/December)

8 There were only six orders for this sub-metric in both October and November
9 and seven orders in December 2001. Such a small universe for this sub-
10 metric does not provide a conclusive benchmark comparison.

11

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

13 There were only ten rejected LSRs for this sub-metric in October 2001. Such
14 a small universe for this sub-metric does not provide a conclusive benchmark
15 comparison. BellSouth met the retail analogue comparison for this sub-metric
16 in November and December 2001.

17

18 Reject Interval / Other Design / Electronic (B.1.4.14) (October/November)

19 There were only nine rejected LSRs for this sub-metric in October and only
20 eight rejected LSRs in November 2001. Such a small universe for this sub-
21 metric does not provide a conclusive benchmark comparison. BellSouth met
22 the benchmark for this sub-metric in December 2001.

1

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

3 (October/November/December)

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

15

16 Reject Interval / LNP (Standalone) / Electronic (B.1.4.17) (November)

17 BellSouth met the one-hour benchmark for 45 of the 50 LSRs rejected in this
18 sub-metric for November 2001. The 97% benchmark required that 49 of the
19 50 LSRs for November be returned within the 1-hour period. BellSouth met
20 the benchmark for this sub-metric in October and December 2001.

21

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

2 (October/November)

3 BellSouth met the 10-hour benchmark interval for 10 of the 12 rejected LSRs
4 for this sub-metric in October 2001. The 85% benchmark required that 11 of
5 the 12 orders be returned. There were only 6 LSRs rejected for this sub-
6 metric in November and 5 LSRs rejected in December 2001. The small
7 universe of orders during the month does not provide a conclusive benchmark
8 comparison.

9

10 Reject Interval / 2w Analog Loop w/LNP Design / Partially Mechanized

11 (B.1.7.12) (October/November)

12 There were only seven rejected LSRs for this sub-metric in October and four
13 rejected LSRs in November 2001. Such a small universe for this sub-metric
14 does not provide a conclusive benchmark comparison. There was no CLEC
15 activity for this sub-metric in December 2001.

16

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

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

22

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

2 There were only six LSRs rejected for this sub-metric in November 2001.
3 Such a small universe does not produce a statistically conclusive benchmark
4 comparison. BellSouth met the benchmark comparison for this sub-metric in
5 October and December 2001.

6

7 FOC Timeliness

8 For LSRs submitted electronically, the benchmark is 95% of the FOCs
9 returned within 3 hours. In October, November and December 2001,
10 BellSouth returned 98%, 96% and 99%, respectively, of FOCs for
11 electronically submitted LSRs within the 3-hour benchmark interval. For
12 partially mechanized LSRs, the benchmark is 85% returned within 10 hours.
13 BellSouth met the 10-hour benchmark in October, November and December,
14 with 97%, 97% and 94%, respectively, of the FOCs returned for partially
15 mechanized LSRs returned within the 10-hour benchmark period. For LSRs
16 submitted manually, the benchmark is 85% returned within 36 hours. In
17 October, November and December 2001, BellSouth returned 96%, 98% and
18 99.7%, respectively, of the FOCs for manually submitted UNE LSRs within
19 the 36-hour window. The sub-metrics that did not meet the benchmark in
20 October, November and/or December are as follows:

21

22 FOC Timeliness / Other Non-Design / Electronic (B.1.9.15) (December)

1 BellSouth met the 3-hour benchmark interval for 454 of the 482 FOCs
2 returned for this sub-metric in December 2001. The 95% benchmark required
3 that 458 of the 482 FOCs be returned within the benchmark interval.
4 BellSouth met the benchmark for this sub-metric in October and November
5 2001.

6

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

8 BellSouth met the 3-hour benchmark interval for 688 of the 788 FOCs
9 returned for this sub-metric in November 2001. BellSouth is currently
10 investigating apparent time-stamp discrepancies affecting some LSRs in this
11 sub-metric. BellSouth met the benchmark for this sub-metric in October and
12 December 2001.

13

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

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

20

21 FOC Timeliness / 2w Analog Loop w/LNP Design / Partial Electronic
22 (B.1.12.12) (November/December)

1 There were only two LSRs returned for this sub-metric in November and four
2 LSRs in December 2001. Such a small universe does not provide a
3 conclusive benchmark comparison. BellSouth met the benchmark for this
4 sub-metric in October 2001.

5

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

7 BellSouth met the 10-hour benchmark for 16 of the 19 FOCs returned for this
8 sub-metric in October 2001. This was only one order short of the 17 orders
9 required to be returned to meet the 85% benchmark. BellSouth met the
10 benchmark for this sub-metric in November and December 2001.

11

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

13 BellSouth met the 36-hour benchmark interval for 52 of the 62 FOCs returned
14 for this sub-metric in October 2001. This was only one order short of the 53
15 orders required to be returned to meet the 85% benchmark. BellSouth met
16 the benchmark for this sub-metric in November and December 2001.

17

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

19 (November)

20 BellSouth met the standard criteria for 15 of the 16 responses for this sub-
21 metric in November 2001. With a 95% benchmark and a universe size of 16
22 orders, problems with even one response causes a miss for the entire sub-

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

17

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

19 / Electronic (B.1.14.9.2) (November/December)

20 There was only one order for this sub-metric in November and two orders in
21 December 2001. The small universe size for this sub-metric does not provide

1 a conclusive benchmark comparison. There was no CLEC activity for this
2 sub-metric in October 2001.

3

4 FOC & Reject Response Completeness / Other Design / EDI / Electronic
5 (B.1.14.14.1) (December)

6 BellSouth met the standard criteria for 10 of the 12 responses for this sub-
7 metric in December 2001. The 95% benchmark required that all 12 of the 12
8 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
9 October and November 2001.

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 and December 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
22 orders, problems with even one response causes a miss for the entire sub-

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

3

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

6 BellSouth met the standard criteria for 114 of the 121 responses for this sub-
7 metric in November and for 129 of the 139 responses returned in December
8 2001. The 95% benchmark required that 115 of the 121 orders for November
9 and 133 of the 139 orders for December meet the criteria. BellSouth met the
10 benchmark for this sub-metric in October 2001.

11

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

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

18

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

21 BellSouth met the benchmark standard for 36 of the 38 responses for this
22 sub-metric in November 2001. The 95% benchmark required that 37 of the

1 38 orders meet the criteria. BellSouth met the benchmark for this sub-metric
2 in October and December 2001.

3

4 FOC & Reject Response Completeness / 2w Analog Loop Non-Design /
5 Manual (B.1.16.9) (November/December)

6 BellSouth met the criteria for 27 of the 30 responses returned in November
7 and for 23 of the 28 responses for December 2001. The 95% benchmark set
8 requirements of 29 of the 30 responses in November and 27 of 28 responses
9 in December, based on the quantity of orders for this sub-metric. BellSouth
10 continues to focus on this measurement in order to improve results to meet
11 the benchmark. BellSouth met the benchmark for this sub-metric in October
12 2001.

13

14 FOC & Reject Response Completeness / Other Design / Manual (B.1.16.14)
15 (December)

16 BellSouth met the benchmark standard for 42 of the 49 responses for this
17 sub-metric in December 2001. The 95% benchmark required that 47 of the
18 49 responses meet the standard criteria. BellSouth continues to focus on this
19 measurement in order to improve results to meet the benchmark. BellSouth
20 met the benchmark for this sub-metric in October and November 2001.

21

1 FOC & Reject Response Completeness / Other Non-Design / Manual

2 (B.1.16.15) (November)

3 BellSouth met the benchmark standard for 71 of the 78 responses for this
4 sub-metric in November 2001. The 95% benchmark required that 75 of the
5 78 responses meet the standard criteria. BellSouth met the benchmark for
6 this sub-metric in October and December 2001.

7

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

9 (B.1.16.16) (November)

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

14

15 Flow-Through

16 Attachment 1G, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated
17 by customer type and for the Summary/Aggregate. Detailed flow-through
18 results for individual CLECs are included in Attachment 2G. The following
19 table shows the Regional Flow-Through results for October, November and
20 December 2001 as compared with the Interim SQM benchmarks.

21

22 % Flow-through Service Requests (F.1.1.1 – F.1.3.4)

<u>Customer Type</u>	<u>October 2001</u>	<u>November 2001</u>	<u>December 2001</u>	<u>Benchmark</u>
Residence	89.40%	89.40%	89.50%	95%
Business	70.17%	75.18%	74.07%	90%
UNE	76.74%	79.66%	82.67%	85%
LNP	86.96%	91.24%	87.62%	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.

1

2 **2. UNE Provisioning Measures**

3 BellSouth met 95% of the overall UNE Provisioning measurements in
4 October, 96% in November and 97% in December 2001 for sub-metrics
5 having CLEC activity. The following sub-metrics did not meet the applicable
6 retail analogues in the months of October, November and/or December 2001:

7

8 % Jeopardies / Combo Other / Electronic (B.2.5.4) (December)

9 There was only one order for this sub-metric in December 2001. The small
10 universe of orders for this sub-metric does not provide a statistically
11 conclusive comparison to the retail analogue. There was no CLEC activity for
12 this sub-metric in either October or November 2001.

13

14 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /
15 Dispatch (B.2.19.3.1.1) (November/December)

16 There were 13 total troubles reported for this sub-metric for the 122 orders
17 completed in the 30 days prior to November and 9 troubles reported for the
18 81 orders completed in the 30 days prior to December 2001. Six of the
19 thirteen trouble reports for November and five of the nine trouble reports for
20 December were closed as “no trouble found.” Excluding these NTF reports,
21 the results for the CLECs would have been better than for the BellSouth retail

1 analogue for both months. BellSouth met the retail analogue comparisons for
2 this sub-metric in October 2001.

3

4 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /
5 Dispatch In (B.2.19.3.1.4) (December)

6 There were 26 total troubles reported for this sub-metric for the 563 orders
7 completed in the 30 days prior to December 2001. Of the 26 total trouble
8 reports, 11 reports (42%) were closed and “no trouble found.” Excluding
9 these NTF reports, the results for the CLECs would have been better than for
10 the BellSouth retail analogue. BellSouth met the retail analogue comparison
11 for this sub-metric in October and November 2001.

12

13 Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch
14 (B.2.34.1.1.1) (October)

15 BellSouth met the standard for 9 of the 10 orders reviewed for this sub-metric
16 in October 2001. The 95% benchmark set a requirement of all 10 orders.
17 BellSouth met the benchmark for this sub-metric in November and December
18 2001.

19

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

1 There were only seven orders reviewed for this sub-metric for October 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 November and December 2001.

5

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

8 There were only two orders reviewed for this sub-metric in October 2001.
9 The small universe for this sub-metric does not provide a conclusive
10 benchmark comparison. There were no orders reviewed for this sub-metric in
11 either November or December 2001.

12

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

15 BellSouth met the standard criteria for 284 of the 300 orders reviewed for this
16 sub-metric in November 2001. This was only one order short of the 285
17 orders required by the 95% benchmark for the month of November 2001,
18 based on the number of orders reviewed for the sub-metric. BellSouth met
19 the benchmark comparison for this sub-metric in October and December
20 2001.

21

1 Service Order Accuracy / Loops Non-Design / >= 10 Circuits / Non-Dispatch

2 (B.2.34.2.2.2) (November)

3 BellSouth met the standard for 49 of the 58 orders reviewed in this sub-metric
4 for November 2001. The 95% benchmark set a requirement of 56 orders for
5 the month, based on the quantity of orders for this sub-metric. There were no
6 orders reviewed for this sub-metric in either October 2001. BellSouth met the
7 benchmark comparison for this sub-metric in December 2001.

8

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

10 BellSouth met the applicable performance standard for 96% for October, 91%
11 for November and 94% for December 2001 of the overall UNE M&R
12 measurements. The UNE M&R sub-metrics that did not meet the fixed critical
13 value for this checklist item are as follows:

14

15 Customer Trouble Report Rate / Other Non-Design / Dispatch (B.3.2.11.1)

16 (October/November/December)

17 There were 12 trouble reports in October for the 269 lines in service for this
18 sub-metric, 10 trouble reports for the 256 lines in service in November and 11
19 trouble reports in December for the 115 lines in service. Both the CLECs and
20 BellSouth retail received over 95% trouble free service for this sub-metric in
21 both October and November 2001. Although, no apparent trends have been

1 identified for the increased facilities problems experienced in December,
2 BellSouth is still investigating this issue.

3

4 Customer Trouble Report Rate / Other Non-Design / Non-Dispatch

5 (B.3.2.11.2) (October/November/December)

6 There were 6 troubles reported for the 269 lines in service for this sub-metric
7 in October, 6 troubles reported for the 256 lines in service in November and 6
8 troubles reported for the 115 lines in services in December 2001. Both the
9 CLECs and BellSouth retail had greater than 97% trouble free service for all
10 in service lines in this sub-metric in October and November. Of the 6 trouble
11 reports for December, 3 reports (50%) were closed as “no trouble found.”
12 Excluding these reports, the results for the CLEC lines in service would have
13 been greater than 97% trouble free for December as well.

14

15 Maintenance Average Duration / Combo (Loop & Port) / Non-Dispatch

16 (B.3.3.3.2) (November)

17 The average duration for the 105 repair orders for this sub-metric in
18 November was 8.39 hours as compared to the duration for the retail analogue
19 of 5.90 hours. Of the 105 repair orders, 73, or 70%, were closed as “no
20 trouble found.” Nine of the remaining troubles were due to one carrier system
21 failure that required 39 hours to repair (charged as 351 total hours for the 9

1 circuits). BellSouth met the retail analogue comparison for this sub-metric in
2 October and December 2001.

3

4 % Repeat Troubles within 30 Days / Combo Other / Dispatch (B.3.4.4.1)
5 (November)

6 There was only one order for this sub-metric in November 2001. The small
7 universe size for this sub-metric does not provide a statistically conclusive
8 comparison to the retail analogue. BellSouth met the retail analogue
9 comparison for this sub-metric in October and December 2001.

10

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

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

17

18 **UNE – Billing**

19 Invoice Accuracy (B.4.1) (December)

20 The CLECs experienced UNE invoice accuracy rates that were slightly less
21 than the rates for the invoices BellSouth sent to its retail customers during
22 December 2001 (98.55% accuracy for BellSouth versus 81.43% for the CLEC

1 invoices). The difference in performance was the result of some incorrect
2 rates being used to bill one customer. In an effort to minimize the number of
3 incorrect rates that are used to bill our customers, BellSouth has put a
4 process in place to verify and clean up its rate databases and rate templates.

5

6 **4. Other UNE Measures**

7

8 **Pre-Ordering**

9 Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1) and
10 Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering
11 measurements. All measures that had CLEC activity met the benchmarks for
12 October, November and/or December 2001 except for the following:

13

14 **Loop Makeup Inquiry / Manual (F.2.1) (October)**

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

20

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

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

6

7 **Operations Support Systems**

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

11

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

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

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

22

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

2 (October/November/December)

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

17

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

19 (October/November/December)

20 The average response intervals for these sub-metrics are measured in three
21 separate disaggregations -- the percentage of queries that are responded to
22 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

1 For all three measurements, the results were virtually identical in December,
2 with all the measures being less than 1% apart. In October and November,
3 the difference in the less than 4-second interval responses was less than 2%,
4 while the differences in the less than 10-second and greater than 10-second
5 interval responses were less than 0.5%. These results indicate virtually
6 equivalent service levels for both the CLECs and BellSouth retail.

7

8 Average Response Interval / LMOSupd / Region (D.2.4.5.1, D.2.4.5.2,
9 D.2.4.5.3) (October/November/December)

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

17

18 Average Response Interval / LNP/ Region (D.2.4.6.1)

19 (October/November/December)

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

21 The average response interval for this measurement is measured in three
22 separate disaggregations -- the percentage of queries that are responded to

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

10
11 Average Response Interval / MARCH / Region (D.2.4.7.1, D.2.4.7.2,
12 D.2.4.7.3) (November/December)

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 BellSouth missed the retail analogue comparison for this measure in
17 November and December but met the retail analogue comparison for these
18 sub-metrics in October 2001.

19
20 Average Response Interval / OSPCM / Region (D.2.4.8.1, D.2.4.8.2,
21 D.2.4.8.3) (December)

1 The average response interval for these sub-metrics is 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 In December 2001, the CLEC response interval was 63.38% within 4 seconds
5 as compared to 76.69% for the retail analogue. For the less than 10 second
6 response interval, the CLECs received 92.96% of their responses and the
7 retail analogue received 98.29% in December. For the greater than 10
8 second response interval, the CLECs received 7.04% of their responses and
9 the retail analogue received 1.71% in December. BellSouth met the retail
10 analogue comparison for all three of these sub-metrics in October and
11 November 2001.

12
13 Average Response Interval / SOCS / Region (D.2.4.10.1, D.2.4.10.2,
14 D.2.4.10.3) (December)

15 The average response interval for these sub-metrics is measured in three
16 separate disaggregations -- the percentage of queries that are responded to
17 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
18 In December 2001, the CLEC response interval was 98.70% within 4 seconds
19 as compared to 99.75% for the retail analogue. For the less than 10 second
20 response interval, the CLECs received 98.87% of their responses and the
21 retail analogue received 99.91% in December. For the greater than 10
22 second response interval, the CLECs received 1.13% of their responses and

1 the retail analogue received 0.09% in December. The differences between
2 BellSouth retail results and CLEC results were only about 1% for each time
3 period. BellSouth met the retail analogue comparison for all three of these
4 sub-metrics in October and November 2001.

5

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

7 The average response interval for this sub-metric is measured in three
8 separate disaggregations -- the percentage of queries that are responded to
9 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
10 In October, the average response interval for the CLEC requests did not meet
11 the retail analogue intervals for the less than 4-second disaggregation but
12 exceeded both the less than 10 and greater than 10 seconds responses. The
13 CLEC response interval was 71.22% within 4 seconds in October, as
14 compared with 72.73% for the retail analogue. The small difference between
15 the CLEC and retail analogue results should not impede the CLECs' ability to
16 compete in this area. BellSouth met the retail analogue comparison for this
17 sub-metric in November and December 2001.

18

19 **General – Billing**

20 Usage Data Delivery Timeliness (F.9.2) (November/December)

21 This measure tracks the percentage of usage data delivered within six
22 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs

1 experienced usage data delivery timeliness rates that were slightly lower than
2 the rates for BellSouth customers during November and December 2001 (for
3 November, 98.89% for BellSouth compared to 98.37% for CLECs, and for
4 December, 99.24% for BellSouth compared to 98.90% for CLECs). The
5 difference in performance for November was the result of some input files
6 being left out of the ADUF job before the files were recovered and processed.
7 The difference in performance for December was the result of usage
8 processing delays caused by system problems that occurred during the initial
9 conversion of usage records to the format used with BellSouth's Integrated
10 Billing Solution (IBS) project. Manual processes were temporarily put into
11 place during the conversion to ensure that all usage data was correctly
12 converted, processed and verified. This problem should not re-occur since
13 the initial usage conversions for all BellSouth states have now been
14 completed. It is important to point out that the CLEC result of 98+% still
15 provides the CLECs a meaningful opportunity to compete. BellSouth met the
16 retail analogue comparison for this sub-metric in October 2001.

17
18 Usage Data Delivery Completeness (F.9.3) (November/December)

19 This measure tracks the percentage of usage data delivered within thirty
20 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs
21 experienced usage data delivery timeliness rates that were slightly lower than
22 the rates for BellSouth customers during November and December 2001 (for

1 November, 99.85% for BellSouth compared to 99.54% for CLECs, and for
2 December, 99.80% for BellSouth compared to 99.70% for CLECs). The
3 difference in performance for November was the result of some input files
4 being left out of the ADUF job before the files were recovered and processed.
5 The difference in performance for December was the result of usage
6 processing delays caused by system problems that occurred during the initial
7 conversion of usage records to the format used with BellSouth's Integrated
8 Billing Solution (IBS) project. Manual processes were temporarily put into
9 place during the conversion to ensure that all usage data was correctly
10 converted, processed and verified. This problem should not re-occur since
11 the initial usage conversions for all BellSouth states have now been
12 completed. It is important to point out that the CLEC result of 99+% still
13 provides the CLECs a meaningful opportunity to compete. BellSouth met the
14 retail analogue comparison for this sub-metric in October 2001.

15
16 Recurring Charge Completeness / Interconnection (F.9.5.3) (October)

17 In October 2001, the results for this measure were 32.99% against a
18 benchmark of 90%. The results were negatively impacted by service orders
19 issued to move billed amounts from one billing account to another connected
20 with CLECs which have filed for bankruptcy. These orders were backdated
21 several months to the date of the bankruptcy. None of these orders impacted
22 the CLECs' total billed amounts but were issued to separate pre-bankruptcy

1 billed amounts from post-bankruptcy amounts. The CLECs are provided with
2 a meaningful opportunity to compete, as these issues do not impede the
3 ability to serve end users. BellSouth met the benchmark for this sub-metric in
4 November and December 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 November 2001. There were no releases for these sub-metrics
12 in December 2001.

13

14 % Change Management Documentation Sent On Time (F.10.3)

15 (November/December)

16 Average Documentation Release Delay Days (F.10.5) (November/December)

17 There was only one Change Management Documentation notice issued in
18 November and four notices issued in December 2001. The notice for
19 November and two of the notices for December did not meet the standard
20 notice interval. BellSouth met the benchmark for these sub-metrics in
21 October 2001.

22

1 **General – Ordering**

2 % Acknowledgement Message Completeness / EDI (F.12.2.1) (October)

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

11

12 % Acknowledgement Message Completeness / TAG (F.12.2.2)

13 (October/December)

14 BellSouth failed to deliver 4 (0.002%) of the 195,248 messages in October
15 and 1 (0.0003%) of the 302,925 messages in December 2001 for this sub-
16 metric. Analysis continues to identify any issues in this process. However,
17 such a small number of failed records have not revealed any systemic
18 process problems. BellSouth met the benchmark for this sub-metric in
19 November 2001.

20

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

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

5
6 For purposes of discussion in this checklist item, the local loop sub-metrics
7 have been separated into two mode-of-entry groups, xDSL and
8 SL1/SL2/Digital. The xDSL group includes xDSL (ADSL, HDSL, UCL), ISDN
9 and Line Sharing sub-metrics. The SL1/SL2/Digital group includes the design
10 and non-design 2-wire analog loops, as well as the 2-wire and 4-wire digital
11 loop sub-metrics.

12

13 **xDSL Group**

14

15 **1. Provisioning Measures**

16 The provisioning sub-metrics that did not meet the retail analogues in
17 October, November and/or December are as follows:

18

19 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits /
20 Dispatch (B.2.19.7.1.1) (November)

21 There were only two orders for this sub-metric in November 2001. The small
22 universe of orders for this sub-metric does not provide a statistically

1 conclusive comparison to the retail analogue. BellSouth met the retail
2 analogue for this sub-metric in October and December 2001.

3
4 **2. Maintenance & Repair Measures**

5
6 Customer Trouble Report Rate / xDSL Loops / Dispatch (B.3.2.5.1) (October)

7 There were only 6 trouble reports for the 359 lines in service for this sub-
8 metric in October 2001. Both the CLECs and BellSouth retail had greater
9 than 98% trouble free service for all in service lines in this sub-metric in
10 October. BellSouth met the retail analogue for this sub-metric in November
11 and December 2001.

12
13 Customer Trouble Report Rate / UNE ISDN / Dispatch (B.3.2.6.1)

14 (November/December)

15 The CLEC aggregate reported 20 troubles for the 578 lines in service for this
16 sub-metric in November and 11 troubles for the 580 lines in service in
17 December 2001. Both the CLECs and BellSouth retail had greater than 96%
18 trouble free service for all in service lines in this sub-metric in November and
19 greater than 98% trouble free service in December. BellSouth met the retail
20 analogue for this sub-metric in October 2001.

1 Customer Trouble Report Rate / Line Sharing / Non-Dispatch (B.3.2.7.2)

2 (October/November/December)

3 The CLEC aggregate reported 10 troubles for this sub-metric in October, 21
4 troubles in November and 26 troubles in December 2001. All of the trouble
5 reports in all three months were issued by one CLEC, and 9 of the 10 reports
6 from October, 14 of the 21 reports for November and 20 of the 26 reports for
7 December were closed as “no trouble found.” In December, 4 lines were
8 reported 10 times with all 10 reports being closed as “no trouble found.”

9

10 % Repeat Troubles within 30 Days / UNE ISDN / Non-Dispatch (B.3.4.6.2)

11 (November)

12 There were only two trouble reports for this sub-metric in November and two
13 reports for December 2001. The small universe of orders for this sub-metric
14 does not provide a statistically conclusive comparison to the retail analogue.
15 BellSouth met the retail analogue comparison for this sub-metric in October
16 2001.

17

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

19 (November)

20 There were only two “out of service” trouble reports for this sub-metric in
21 November 2001. The small universe of orders for this sub-metric does not
22 provide a statistically conclusive comparison to the retail analogue. BellSouth

1 met the retail analogue comparison for this sub-metric in October and
2 December 2001.

3

4 **SL1/SL2/Digital Loop Group**

5

6 BellSouth met the benchmarks/retail analogues for all maintenance & repair
7 sub-metrics for the SL1/SL2/Digital Loop Group in October, November and
8 December 2001. The provisioning sub-metrics that did not meet the retail
9 analogue for this group in October, November and/or December 2001 are:

10

11 % Jeopardies / Digital Loop >= DS1 / Electronic (B.2.5.19)

12 (October/November/December)

13 There were only 7 orders associated with this sub-metric in October, 7 orders
14 in November and 9 orders in December 2001. Even though 5 of the 7 orders
15 for October, 5 of the 7 orders for November and 4 of the 9 orders for
16 December were shown in jeopardy status, all of the jeopardies for each of the
17 three months were resolved prior to the due dates and the orders were
18 completed as scheduled. The small universe size for this sub-metric does not
19 provide a statistically conclusive comparison to the retail analogue.

20

21 % Missed Installation Appointments / 2w Analog Loop Non-Design / < 10

22 Circuits / Dispatch (B.2.18.9.1.1) (November)

1 There were only six orders for this sub-metric in November 2001. The small
2 universe of orders for this sub-metric does not provide a statistically
3 conclusive comparison to the retail analogue. There was no CLEC activity for
4 this sub-metric in October 2001. BellSouth met the retail analogue
5 comparison for this sub-metric in December 2001.

6

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

8

9 The data in these measures indicate that BellSouth met the
10 benchmark/analogue requirements for all measurements in Checklist Item 5
11 for October, November and December 2001.

12

13

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

15

16 The data in these measures indicate that BellSouth met the
17 benchmark/analogue requirements for all measurements in Checklist Item 6
18 for October, November and December 2001.

19

1 **G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES**

2 **H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR**
3 **SERVICES**

4
5 As indicated in Attachment 1G, Sections F.6, F.7 and F.8, BellSouth met the
6 benchmark/analogous requirements of Checklist Items 7a and 7b in October,
7 November and December 2001. Even though BellSouth tracks and reports
8 these measures, the processes used in providing these services are designed
9 to provide parity for all users.

10
11 **I. CHECKLIST ITEM 10 – ACCESS TO DATABASES AND ASSOCIATED**
12 **SIGNALING**

13 BellSouth met the required benchmarks for three of the four sub-metrics
14 associated with this checklist item in October, for all four of the four sub-
15 metrics in November and December 2001. See items F.13.1.1 through
16 F.13.3 in Attachment 1G for further details. The sub-metric that did not meet
17 the appropriate benchmark in October 2001 was as follows:

18
19 % NXXs / LRNs Loaded by LERG Effective Date (Region) (F.13.3) (October)

20 The measure indicated that 45 of 48 NXXs were loaded by their effective date
21 for the entire BellSouth region in October 2001. This is a regional measure.
22 There were no missed dates in Kentucky for this sub-metric in October.

1 BellSouth met the benchmark for this sub-metric in November and December
2 2001.

3

4 **J. CHECKLIST ITEM 11 – NUMBER PORTABILITY**

5

6 All the measurements in this Checklist Item were met or exceeded for
7 October, November and/or December 2001 except for the following:

8

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

11 A root cause analysis of this measure uncovered a system coding problem in
12 the Barney data extract process. A corrective coding change was
13 implemented during November 2001. BellSouth met the retail analogue
14 comparison for this sub-metric in November and December 2001.

15

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

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

22

1 On a great majority of LNP orders, BellSouth creates what is referred to as a
2 “trigger” in conjunction with the order. This trigger gives the end user
3 customer the ability to make and receive calls from other customers who are
4 served by the customer’s host switch at the time of the LNP activation. This
5 ability is not dependent upon BellSouth working a disconnect order in the
6 central office switch. In other words, when a trigger is involved, an end user
7 customer can receive calls from other customers served by the same host
8 switch before the disconnect order is ever worked.

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

1 on end users, and, therefore, the measurements will be shown blank until a
2 resolution is reached on this issue.

3

4

K. CHECKLIST ITEM 14 – RESALE

5

6 BellSouth met or exceeded the benchmarks or retail analogues for 88% of the
7 Resale sub-metrics having CLEC activity in December 2001. In October and
8 November 2001, BellSouth met or exceeded the benchmarks/analogues for
9 82% and 84%, respectively, of the resale sub-metrics. The details for the
10 December data are delineated in Attachment 1G, Items A.1.1.1.1 through
11 A.4.2.

12

13 During the three-month period from October through December 2001, there
14 were 139 Resale sub-metrics that had data for all three months and were
15 compared to benchmarks or retail analogues. Of those 139 sub-metrics, 125
16 (90%) sub-metrics met the relevant criteria in at least two of the three months.

17

1. Resale Ordering Measures

FOC Timeliness

20 In October 2001, BellSouth returned FOCs for 8,731 Resale LSRs and met
21 the relevant benchmark on 99% of all FOCs. Of the 8,731 LSRs, 7,304 were
22 fully mechanized with 99.8% meeting the 3-hour benchmark. In November

1 2001, BellSouth returned FOCs for 7,692 Resale LSRs and met the relevant
2 benchmark on 99% of all FOCs. Of the 7,692 LSRs, 6,555 were fully
3 mechanized with 99.8% meeting the 3-hour benchmark. In December 2001,
4 BellSouth returned FOCs for 7,020 Resale LSRs and met the relevant
5 benchmark on 98% of them. Of the 7,020 LSRs, 5,907 were fully
6 mechanized with 99.7% meeting the 3-hour benchmark. See Attachment 1G,
7 Sections A.1.9 through A.1.13 for further details.

8

9 **Reject Interval**

10 In October 2001, 1,473 LSRs were rejected, with 95% returned within the
11 relevant benchmark period. Of the LSRs rejected in October, 50% were
12 submitted electronically with 95% returned within the 1-hour benchmark. In
13 November 2001, 1,291 LSRs were rejected, with 96% returned within the
14 relevant benchmark period. Of the LSRs rejected in November, 57% were
15 submitted electronically with 95% returned within the 1-hour benchmark. In
16 December 2001, 1,167 LSRs were rejected, with 96% returned within the
17 relevant benchmark period. Of the LSRs rejected in December, 56% were
18 submitted electronically with 96% returned within the 1-hour benchmark. See
19 Attachment 1G, Items A.1.4 through A.1.8 for further details.

20

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

1

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

3 (October/November/December)

4 Reject Interval / Business / Electronic (A.1.4.2)

5 (October/November/December)

6 The current benchmark for electronic rejects is $\geq 97\%$ within one hour.

7 BellSouth's root cause analysis determined that a number of LSRs that did

8 not meet the one-hour benchmark were submitted when back-end legacy

9 systems were out of service and were unable to process the LSRs. Because

10 such LSRs should be excluded from the measurement, BellSouth

11 implemented a coding change in PMAP to ensure that scheduled OSS

12 downtime was properly excluded. This change was made with September

13 2001 data and was expected to improve sub-metric results for Reject Interval

14 performance.

15

16 The coding change assumed that EDI and TAG timestamps reflected Eastern

17 Time. However, the timestamps used by EDI and TAG actually reflects

18 Central time. As a result of this discrepancy, an hour is being added during

19 PMAP timestamp "synchronization," which causes the results to inaccurately

20 reflect the reject Interval duration. A change to address this issue for EDI is

21 scheduled for implementation with February 2002 data, and BellSouth is in

22 the process of scheduling a similar change for TAG. BellSouth's root cause

1 analysis has determined that, had the scheduled OSS downtime exclusion
2 been properly implemented, BellSouth's Reject Interval performance would
3 generally have met the Commission's benchmark.

4

5 BellSouth's root cause analysis also identified an additional issue that impacts
6 the electronic Reject Interval sub-metrics. This issue arises when a fully
7 mechanized Firm Order Confirmation ("FOC") is followed by a manual
8 Clarification, a scenario that occurs when the Local Carrier Service Center
9 ("LCSC") must resolve specific types of errors after the issuance of the FOC.
10 This issue distorts the timeliness of BellSouth's electronic reject notices, and
11 BellSouth is currently analyzing this situation to determine an appropriate
12 solution.

13

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

15 There was only one rejected LSR for this sub-metric in October and two
16 rejected LSRs in November 2001. The small universe for this sub-metric
17 does not provide a conclusive benchmark comparison. There was no CLEC
18 activity for this sub-metric in December 2001.

19

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

21 There were only 6 orders associated with this sub-metric in October 2001.
22 Such a small universe does not provide a conclusive benchmark comparison.

1 BellSouth met the benchmark comparison for this sub-metric in November
2 2001. There was no CLEC activity for this sub-metric in December 2001.

3

4 FOC Timeliness / Business / Partial Electronic (A.1.12.2) (December)

5 BellSouth met the 10-hour benchmark for 80 of the 105 FOCs returned for
6 this sub-metric in December 2001. The 85% benchmark required that 90 of
7 the 105 FOCs be returned within the benchmark interval. BellSouth met the
8 benchmark for this sub-metric in October and November 2001.

9

10

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

12 There was only one LSR associated with this sub-metric in October 2001.
13 The small universe of orders for this sub-metric does not provide a conclusive
14 benchmark comparison. There was no CLEC activity for this sub-metric in
15 either November or December 2001.

16

17 FOC Timeliness / PBX) / Partial Electronic (A.1.12.4)

18 (October/November/December)

19 There were only two LSRs associated with this sub-metric in October, two
20 LSRs in November and one LSR in December 2001. The small universe of
21 orders for this sub-metric does not provide a conclusive benchmark
22 comparison.

1

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

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

7

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

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

13

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

16 There were only three orders for this sub-metric in November 2001. The
17 small universe of orders for this sub-metric does not provide a conclusive
18 benchmark comparison. BellSouth met the benchmark for this sub-metric in
19 October 2001. There was no CLEC activity for this sub-metric in December
20 2001.

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, for 125 of the 134 responses in November and for 75
5 of the 82 responses returned in December 2001. The 95% benchmark
6 required that 133 of the 139 responses for October, 128 of the 134 responses
7 for November and 78 of the 82 responses for December meet the criteria.
8 BellSouth continues to focus on this measurement in order to improve results
9 to meet the benchmark.

10

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

12 (November/December)

13 BellSouth met the benchmark standard for 79 of the 84 responses for this
14 sub-metric in November and for 87 of the 107 responses returned in
15 December 2001. The 95% benchmark required that 80 of the 84 responses
16 for November and 102 of the 107 responses for December meet the criteria.
17 BellSouth continues to focus on this measurement in order to improve results
18 to meet the benchmark. BellSouth met the benchmark for this sub-metric in
19 October 2001.

20

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

22 (A.1.16.3) (October/November)

1 BellSouth met the benchmark standard for 23 of the 26 responses for this
2 sub-metric in October and for 41 of the 57 responses in November 2001.
3 The 95% benchmark required that 25 of the 26 responses in October and 55
4 of the 57 responses in November meet the criteria. BellSouth continues to
5 focus on this measurement in order to improve results to meet the
6 benchmark. BellSouth met the benchmark for this sub-metric in December
7 2001.

8

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

10 (November/December)

11 There were only eight orders for this sub-metric in November and four orders
12 in December 2001. The small universe of orders for this sub-metric does not
13 provide a conclusive benchmark comparison. BellSouth met the benchmark
14 for this sub-metric in October 2001.

15

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

17 (October/December)

18 BellSouth met the benchmark standard for 11 of the 12 responses for this
19 sub-metric in October and for 6 of the 7 responses in December 2001. With
20 universe sizes of only 12 or 7 orders and a 95% benchmark, a problem with
21 only one order causes a miss for the entire sub-metric. BellSouth continues
22 to focus on this measurement in order to improve results to meet the

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

3

4 **2. Resale Provisioning Measures**

5 BellSouth met or exceeded the benchmark or retail analogue for 90% of all
6 Resale provisioning measures in October, 91% in November, and 92% in
7 December 2001. The details supporting the December percentage are
8 delineated in Items A.2.1.1.1.1 through A.2.25.3.2.2 of Attachment 1G.

9

10 Resale provisioning sub-metrics for which BellSouth did not meet the
11 benchmark/retail analogue in October, November and/or December 2001
12 were:

13

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

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

20

21 % Jeopardies / Residence / Electronic (A.2.4.1) (October)

1 BellSouth completed as scheduled over 99% of the installation appointments
2 for this sub-metric in October. There were no systemic installation issues
3 identified for the 21 orders placed in jeopardy status in October. None of the
4 jeopardies in this sub-metric resulted in held orders. BellSouth met the retail
5 analogue comparison for this sub-metric in November and December 2001.

6

7 % Provisioning Troubles within 30 Days / Residence / < 10 Circuits / Non-
8 Dispatch (A.2.12.1.1.2) (October/November/December)

9 For the period October through December 2001, less than 5% of the orders
10 completed for this sub-metric in the prior 30 days had trouble reports in the
11 following month. In October, 44 of the 169 trouble reports (26%) were closed
12 as "TOK/FOK." In November, 49 of the 206 trouble reports (24%) were
13 closed as "TOK/FOK." In December, 41 of the 182 trouble reports (23%)
14 were closed as "TOK/FOK." With a reduction in the number of reports that
15 end up as "no trouble found" incidents, the results for CLEC orders would be
16 virtually the same as the results for the BellSouth retail analogue. Analysis of
17 the troubles found for this sub-metric revealed that a majority were related to
18 cable and drop facilities distributed throughout the state with no distinct
19 pattern or trend.

20

21 % Provisioning Troubles within 30 Days / Business / < 10 Circuits / Dispatch
22 (A.2.12.2.1.1) (October/December)

1 In October 2001, there were a total of 4 troubles reported for the 52 orders
2 that completed in the prior 30 days. In December 2001, there were 6 troubles
3 reported for the 49 orders completed in the prior 30 days. There was no
4 systemic pattern to the troubles reported in either October or December 2001.
5 BellSouth met the retail analogue comparison for this sub-metric in November
6 2001.

7

8 % Provisioning Troubles within 30 Days / PBX / < 10 Circuits / Non-Dispatch
9 (A.2.12.4.1.2) (November)

10 There were only three orders for this sub-metric in November 2001. The
11 small universe of orders for this sub-metric does not provide a statistically
12 conclusive comparison to the retail analogue. BellSouth met the retail
13 analogue comparison for this sub-metric in October and December 2001.

14

15 Service Order Accuracy / Residence / < 10 Circuits / Dispatch (A.2.25.1.1.1)
16 (October)

17 There were only five orders reviewed for this sub-metric in October 2001.
18 This small universe size does not provide a conclusive benchmark
19 comparison. BellSouth met the benchmark for this sub-metric in November
20 and December 2001.

21

1 Service Order Accuracy / Business / < 10 Circuits / Non-Dispatch

2 (A.2.25.2.1.2) (October)

3 BellSouth met the standard for 55 of the 60 orders reviewed in this sub-metric
4 for October 2001. The 95% benchmark set a requirement of 57 of the 60
5 orders, based on the quantity of orders for this sub-metric. BellSouth
6 continues to focus on this measurement in order to improve results to meet
7 the benchmark. BellSouth met or exceeded the benchmark for this sub-
8 metric in November and December 2001.

9

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

11 (November/December)

12 BellSouth met the standard for 21 of the 23 orders reviewed in this sub-metric
13 for November and for 14 of the 17 orders reviewed in December 2001. The
14 95% benchmark set requirements of 22 of the 23 orders for November and all
15 17 of the 17 orders in December, based on the quantity of orders for this sub-
16 metric. BellSouth continues to focus on this measurement in order to improve
17 results to meet the benchmark. There was no CLEC activity for this sub-
18 metric in October 2001.

19

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

21 (A.2.25.2.2.2) (November/December)

1 BellSouth met the standard for 29 of the 31 orders reviewed in this sub-metric
2 for November and for 22 of the 28 orders reviewed in December 2001. The
3 95% benchmark set a requirement of 30 of the 31 orders for November and
4 27 of the 28 orders for December, based on the quantity of orders for this
5 sub-metric. BellSouth continues to focus on this measurement in order to
6 improve results to meet the benchmark. There was no CLEC activity for this
7 sub-metric in October 2001.

8

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

10 (A.2.25.3.1.1) (November/December)

11 BellSouth met the standard for 45 of the 50 orders reviewed in this sub-metric
12 for November and for 56 of the 63 orders reviewed in December 2001. The
13 95% benchmark set requirements of 48 of the 50 orders for November and for
14 60 of the 63 orders for December, based on the quantity of orders for this
15 sub-metric. BellSouth continues to focus on this measurement in order to
16 improve results to meet the benchmark. There was no CLEC activity for this
17 sub-metric in October 2001.

18

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

20 (A.2.25.3.1.2) (October/November)

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

1 BellSouth met the standard for 52 of the 55 orders reviewed for this sub-
2 metric in November 2001. The 95% benchmark set a requirement of 53
3 orders based on the quantity of orders for this sub-metric. BellSouth met the
4 benchmark for this sub-metric in December 2001.

5

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

7

8 BellSouth met the relevant retail analogue comparisons for 89% of all the
9 Resale Maintenance & Repair measurements in October, 90% in November
10 and 92% in December 2001. The sub-metrics for which BellSouth did not
11 meet the retail analogues in October, November and/or December 2001
12 were:

13

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

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

19

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

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

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

7

8 Customer Trouble Report Rate / Business / Non-Dispatch (A.3.2.2.2)
9 (December)

10 In December 2001, the CLECs had over 99% trouble free service for the
11 7,066 lines in service for this sub-metric. Of the 45 trouble reports issued for
12 this sub-metric in December, 31 reports (69%) were closed as “no trouble
13 found.” Excluding these NTF reports, the results for the CLEC orders would
14 have been better than for the BellSouth retail analogue. BellSouth met the
15 retail analogue comparison for this sub-metric in October and November
16 2001.

17

18 Customer Trouble Report Rate / PBX / Dispatch (A.3.2.4.1)
19 (November/December)

20 There were only 9 trouble reports for the 699 lines in service for this sub-
21 metric in November and 3 trouble reports for the 546 lines in service in
22 December 2001. BellSouth provided 98% to 99% trouble free service for the

1 in-service lines in this sub-metric for both CLECs and BellSouth retail
2 customers in both months. When BellSouth provisions high quality service
3 coupled with very large universe sizes, it can cause an apparent out of equity
4 condition from a quantitative viewpoint. In these cases, there is very little
5 variation and the universe size is so large that the Z-test becomes overly
6 sensitive to any difference. In other words, the statistical test shows that the
7 measurement does not meet the fixed critical value when compared with the
8 retail analogue, but BellSouth's actual performance for both CLECs and its
9 own retail operations is at a very high level – often 98% or 99%. From a
10 practical point of view, the CLECs' ability to compete has not been hindered
11 even though the statistical results may technically show that BellSouth failed
12 to meet the benchmark/analogue. BellSouth met the retail analogue
13 comparison for this sub-metric in October 2001.

14
15 Customer Trouble Report Rate / Centrex / Dispatch (A.3.2.5.1) (October)

16 There were 5 trouble reports in October 2001 for the 572 lines in service for
17 this sub-metric. Of the 5 troubles reported for this sub-metric in October, 4
18 were closed as “no trouble found.” BellSouth provided 99% trouble free
19 service for both retail and the CLECs for this sub-metric for October. From a
20 practical point of view, the CLECs' ability to compete has not been hindered
21 even though the statistical results may technically show that BellSouth failed

1 to meet the benchmark/analogue. BellSouth met the retail analogue
2 comparison for this sub-metric in November and December 2001.

3

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

5 There were only 3 trouble reports for the 598 lines in service for this sub-
6 metric in October 2001. BellSouth provided over 99% trouble free service for
7 both retail and the CLECs for this sub-metric in October. From a practical
8 point of view, the CLECs' ability to compete has not been hindered even
9 though the statistical results may technically show that BellSouth failed to
10 meet the benchmark/analogue. BellSouth met the retail analogue
11 comparison for this sub-metric in November and December 2001.

12

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

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

22

1

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

3 There were only nine trouble reports for this sub-metric in November 2001.

4 The 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 October and December 2001.

7

8 % Repeat Troubles within 30 days / Business / Dispatch (A.3.4.2.1) (October)

9 There were 24 repeat reports for the 99 total trouble reports for this sub-
10 metric in October 2001. Of the 24 repeat reports, 9 were closed as “no
11 trouble found.” Excluding these reports, the result would be lower for the
12 CLECs than for the retail analogue for the month. BellSouth met the retail
13 analogue for this sub-metric in November and December 2001.

14

15 % Repeat Troubles within 30 days / Business / Dispatch (A.3.4.2.2) (October)

16 There were 8 repeat reports for the 34 total trouble reports for this sub-metric
17 in October 2001. Of the 8 repeat reports, 6 were closed as “no trouble
18 found.” Excluding these reports, the result would be lower for the CLECs
19 than for the retail analogue for the month. BellSouth met the retail analogue
20 for this sub-metric in November and December 2001.

21

1 % Repeat Troubles within 30 days / PBX / Non-Dispatch (A.3.4.4.2)

2 (December)

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

7

8 % Repeat Troubles within 30 days / Centrex / Non-Dispatch (A.3.4.5.2)

9 (October)

10 There was only one trouble report for this sub-metric in October 2001. The
11 small universe for this measurement does not provide a statistically
12 conclusive comparison with the retail analogue. BellSouth met the retail
13 analogue comparison for this sub-metric in November and December 2001.

14

15 % Repeat Troubles within 30 days / ISDN / Non-Dispatch (A.3.4.6.2)

16 (December)

17 There was only one trouble report for this sub-metric in December 2001. The
18 small universe for this measurement does not provide 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

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

1 There were nine repair orders out of service longer than 24 hours for this sub-
2 metric in November 2001. As discussed in Item A.3.3.2.1, six of the nine
3 reports were dispatched is less than 24 hours, but the technician was unable
4 to gain access to the premises until six days later. Excluding these reports,
5 the result for the CLECs and BellSouth retail would have been virtually the
6 same for the month. BellSouth met the retail analogue for this sub-metric in
7 October and December 2001.

8

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

10 There were only seven repair orders associated with this sub-metric in
11 November 2001. Such a 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 October and
14 December 2001.

15

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

17 There was one trouble report in this sub-metric that resulted in an out-of-
18 service condition for more than 24 hours in October 2001. Such a small
19 universe for this sub-metric does not provide a statistically conclusive
20 comparison to the retail analogue. BellSouth met the retail analogue
21 comparison for this sub-metric in November and December 2001.

22

1 Resale – Billing

2 Mean Time to Deliver Invoices / CRIS / Region (A.4.2) (December)

3 The CLECs experienced Resale invoice delivery rates that were slightly
4 higher than the rates for BellSouth's retail customers during December 2001
5 (3.67 days for BellSouth versus 3.84 days for CLECS). The small difference
6 in performance was the result of recent shifts in workloads within the
7 BellSouth Bill Distribution department.

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 545
13 of the 616 sub-metrics (88%) for which there was CLEC activity in December
14 2001. In November 2001, 597 of 702 sub-metrics (85%) met or exceeded the
15 benchmarks or retail analogues. BellSouth met or exceeded the criteria for
16 577 of the 661 sub-metrics (87%) for which there was CLEC activity in
17 October 2001.

18

19 During the three-month period, October through December 2001, excluding
20 the measures discussed in the Introduction, there were a total of 537 sub-
21 metrics that had CLEC activity for all three months and that were compared
22 with either benchmarks or retail analogues. Of these 537 sub-metrics, 490

1 sub-metrics (91%) satisfied the comparison criteria during at least two of the
2 three months.