DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

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DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

I. INTRODUCTION

This Supplemental Exhibit presents BellSouth's performance measurements data in Kentucky for January 2002. The performance data for Kentucky is provided in Attachment 1H. In addition, Attachments 2 and 3 to Exhibit AJV-6, filed originally on July 10, 2001, have been updated for January 2002 data and are attached to this supplemental exhibit as Attachments 2H and 3H. Attachments 4, 5 and 6 to Exhibit AJV-6 have not been modified, and are, therefore, not included in this supplemental exhibit.

II. ANALYSIS OF PERFORMANCE MEASUREMENTS

A. Introduction

Attachment 1H is the Monthly State Summary (MSS) for Kentucky for January 2001. The January MSS contains 2,328 sub-metrics. In January 2002, BellSouth met or exceeded the comparison criteria for 562 of the 627 sub-metrics, or 90%, that had CLEC activity and were compared to benchmarks or retail analogues.

As explained in previous updates to this Exhibit, three of the measures were identified by BellSouth as having deficiencies in their calculations and were investigated and evaluated for appropriate program code corrections. These three measures were Average Jeopardy Notice Interval, FOC & Reject Completeness (including the "Multiple Responses" sub-metrics), and LNP Disconnect Timeliness. Program coding modifications have been completed for the FOC and Reject Completeness measure. A variation on the FOC & Reject Response Completeness (O-11) measurement, FOC/Reject Completeness (Multiple Responses), indicates the proportion of times that multiple FOCs/Rejects for an LSR are returned. The Georgia PSC did not order this measure to be implemented. Also, this measurement can be misleading because sometimes multiple responses are required for efficient operation of the business, such as when a second FOC is returned to notify a CLEC when a jeopardy was cleared. Consequently, while BellSouth reports data on this measure in the Monthly State Summary, BellSouth has not included it in the calculation of performance measurements that had CLEC activity. Coding changes for the Average Jeopardy Notice Interval measures are still being developed. The LNP Disconnect Timeliness measure is still under review by the Georgia PSC. These measures are included in the MSS and in the total number of measurements calculation (2,328), but are excluded from the "Met/Total" (562/627) percentage calculations.

During the three-month period, November 2001through January 2002, again adjusting for the measures mentioned above where appropriate, there were a total of 544 sub-metrics that had CLEC activity for all three months and that were compared with either benchmarks or retail analogues. Of these 544 sub-metrics, 491 sub-metrics (90%) satisfied the comparison criteria in at least two of the three months.

Each sub-metric designated as having not satisfied the benchmark or BellSouth retail analogue requirement for November, December 2001 and/or January 2002 is included in this Exhibit. Each sub-metric discussed is labeled as to what month(s) the missed criteria occurred (November/December/January).

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

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 1H, 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 November, December 2001 and January 2002.

2. Local Interconnection Trunking

Trunking Reports

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

In November, December 2001 and January 2002, BellSouth met the benchmarks/retail analogue comparisons for 23 of the 25, 18 of the 24 and 22 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 and January 2002 are as follows:

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

There were only seven orders for this sub-metric in December 2001. The small universe of orders for this sub-metric does not provide a conclusive benchmark comparison. BellSouth met or exceeded the benchmark for this sub-metric in November 2001 and January 2002.

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

There were only four orders for this sub-metric in December 2001. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met or exceeded the retail analogue comparison for this sub-metric in November 2001 and January 2002.

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

There were only four orders for this sub-metric in December 2001. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in November 2001. There was no CLEC activity for this sub-metric in January 2002.

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

BellSouth met the standard criteria for 24 of the 26 service orders reviewed for this sub-metric in November 2001. The 95% benchmark required that the criteria be met for 25 of the 26 orders, based on the number of orders in the

measurement. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

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

There was only one trouble report for the 13,035 lines in service for this sub-metric in December 2001, representing a trouble free service rate of over 99.99%. The one trouble report for December was incorrectly coded by the BellSouth technician as "no trouble found." The report should have been coded "information only" and excluded from the measurement since the CLEC reported an invalid telephone number. If coded appropriately, BellSouth would have met the retail analogue comparison for this sub-metric in December 2001. BellSouth met the benchmark for this sub-metric in November 2001 and January 2002.

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

There were 25 troubles reported in November 2001 for the 12,192 lines in service for this sub-metric. Of the 25 trouble reports, 24 were due to a single incident where trunks were turned up with a programming error in the switch that had to be corrected. Both the CLECs and BellSouth retail received

greater than 99.8% trouble free service for this sub-metric in November. When BellSouth provisions high quality service coupled with very large universe sizes, it can cause an apparent out of equity condition from a quantitative viewpoint. In these cases, there is very little variation and the universe size is so large that the Z-test becomes overly sensitive to any difference. In other words, the statistical test shows that the measurement does not meet the fixed critical value when compared with the retail analogue, but BellSouth's actual performance for both CLECs and its own retail operations is at a very high level – in this case over 99%. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

<u>Maintenance Average Duration / Local Interconnection Trunks / Dispatch (C.3.3.1) (December)</u>

There was only one trouble report for this sub-metric in December 2001. The one trouble report for December was incorrectly coded by the BellSouth technician as "no trouble found." The report should have been coded "information only" and excluded from the measurement since the CLEC reported an invalid telephone number. BellSouth spent 10.65 hours trying to

identify a nonexistent problem. If coded appropriately, BellSouth would have met the retail analogue comparison for this sub-metric in December 2001. BellSouth met or exceeded the retail analogue comparison for this sub-metric in November 2001 and January 2002.

Maintenance Average Duration / Local Interconnection Trunks / Non-Dispatch (C.3.3.2) (January)

There were only three trouble reports for this sub-metric in January 2002. The small universe of orders does not provide a statistically conclusive comparison to the retail analogue. BellSouth met or exceeded the retail analogue comparison for this sub-metric in November and December 2001.

% Repeat Troubles within 30 Days / Local Interconnection Trunks / Non-Dispatch (C.3.4.2) (January)

There were only three trouble reports for this sub-metric in January 2002. The small universe of orders does not provide a statistically conclusive comparison to the retail analogue. BellSouth met or exceeded the retail analogue comparison for this sub-metric in November and December 2001.

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

The CLECs experienced Interconnection invoice delivery rates that were slightly higher than the rates for BellSouth's retail customers during December 2001 (4.85 days for BellSouth versus 4.97 days for CLECS). The small difference in performance was the result of recent shifts in workloads within the BellSouth Bill Distribution department. BellSouth will continue to monitor results and will adjust procedures as necessary to further improve this metric. BellSouth met the retail analogue for this sub-metric in November 2001 and January 2002.

Trunk Blockage

BellSouth has developed a trunk blocking report that compares BellSouth retail's trunk blockage rates to those of CLECs. The report, Trunk Group Performance Report (TGP), Attachment 3H, displays trunk blocking in a manner that accurately represents the customer experience. The TGP report tabulates actual call blocking as a percentage of call attempts for all comparable trunk groups administered by BellSouth that handle CLEC and BellSouth traffic. The TGP report provides a direct comparison of hour-by-hour blocking between CLEC and BellSouth trunk groups. Attachment 3H, Item C.5.1 (TGP), shows the actual trunk blocking percentages by hour for January 2002. The Analogue/Benchmark for the Trunk Group Performance measure is any consecutive two-hour period in 24 hours where CLEC

blockage exceeds BellSouth blockage by more than 0.5%. BellSouth met or exceeded the retail analogue for this sub-metric in November, December 2001 and January 2002.

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

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

Product	Checklist Item:
Combo (Loop & Port)	#2 – Unbundled Network Elements
Combo (Other)	#2 – Unbundled Network Elements
Other Design	#2 – Unbundled Network Elements
Other Non-Design	#2 – Unbundled Network Elements
xDSL Loop	#4 – Unbundled Local Loops

UNE ISDN Loop	#4 – Unbundled Local Loops
Line Sharing	#4 – Unbundled Local Loops
2w Analog Loop Design	#4 – Unbundled Local Loops
2w Analog Loop Non Design	#4 – Unbundled Local Loops
2w Analog Loop w/INP Design	#4 – Unbundled Local Loops
2w Analog Loop w/INP Non Design	#4 – Unbundled Local Loops
2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops
Digital Loop < DS1	#4 – Unbundled Local Loops
Digital Loop => DS1	#4 – Unbundled Local Loops
Local Interoffice Transport	#5 – Unbundled Local Transport
Switch Ports	#6 – Unbundled Local Switching
INP Standalone	#11 – Local Number Portability
LNP Standalone	#11 – Local Number Portability

An overall review of the UNE sub-metrics for Ordering, Provisioning, Maintenance & Repair and Billing indicates that BellSouth met the benchmark/analogue for 94% of the sub-metrics during January 2002, 93% of the sub-metrics in December 2001 and 86% of the sub-metrics in November 2001.

During the three-month period from November 2001 through January 2002, there were 265 UNE sub-metrics that had data for all three months and were compared to benchmarks or retail analogues. Of those 265 sub-metrics, 245 (92%) sub-metrics met the relevant criteria in at least two of the three months.

1. UNE Ordering Measures

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

Reject Interval

Items B.1.4 - B.1.8 in Attachment 1H examine the Reject Interval for the month of January 2002. For orders submitted electronically, the benchmark is 97% within one hour. In November and December 2001, 79% and 93%, respectively, of the rejected service requests were delivered within the one-hour time period. In January 2002, 97% of rejected UNE electronic LSRs were returned within the one-hour benchmark.

For partially mechanized orders, the benchmark is 85% within 10 hours. BellSouth exceeded the benchmark in November, December 2001 with 95% of rejects for partially mechanized LSRs returned within the benchmark period and exceeded the benchmark in January 2002 with 96% returned within the 10-hour period.

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

The following sub-metrics did not meet the established benchmarks in November, December 2001 and/or January 2002:

<u>Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3)</u>
<u>(November/December/January)</u>

The current benchmark for electronic rejects is >= 97% within one hour. In January 2002, BellSouth returned 415 of the 431 rejects (96.3%) for electronic LSRs within the 1-hour period. The BellSouth's root cause analysis determined that a number of LSRs that did not meet the one-hour benchmark were submitted when back-end legacy systems were out of service and were

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

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

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

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

Reject Interval / xDSL (ADSL, HDSL and UCL) / Electronic (B.1.4.5) (January)

BellSouth met the benchmark for this measurement in November and December 2001, but missed it in January 2002. However, there were only five orders for this sub-metric in January 2002. Such a small universe for this sub-metric does not provide a conclusive benchmark comparison.

Reject Interval / Line Sharing / Electronic (B.1.4.7) (November/December/January)

There were only six orders for this sub-metric in November and seven orders in both December 2001 and January 2002. Such a small universe for this sub-metric does not provide a conclusive benchmark comparison.

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

There were only eight rejected LSRs for this sub-metric in November and only nine rejected LSRs in January 2002. Such a small universe for this sub-

metric does not provide a conclusive benchmark comparison. BellSouth met the benchmark for this sub-metric in December 2001.

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

BellSouth has been directed to change the time stamp identification for the start and complete times of the interval for this measurement from the Local Exchange Ordering (LEO) System to the CLEC ordering interface system (TAG or EDI). However, with this change, BellSouth is currently unable to identify multiple issues of the same version of LSRs that have been rejected (fatal rejects). These rejected LSRs should be excluded from the measurement. If there are multiple issues of the same version, the measure currently calculates the interval from the initial issue to the final issue of the LSR returned to the CLEC, Reject or FOC. Consequently, BellSouth's performance level is inappropriately understated. BellSouth is currently working to determine a fix for this issue. BellSouth met the benchmark for this measurement in January 2002.

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

BellSouth met the one-hour benchmark for 45 of the 50 LSRs rejected in this sub-metric for November 2001. The 97% benchmark required that 49 of the

50 LSRs for November be returned within the 1-hour period. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

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

There were only 6 LSRs rejected for this sub-metric in November and 5 LSRs rejected in December 2001. The small universe of orders during the month does not provide a conclusive benchmark comparison. Although the volume continued to remain low in January 2002 with only two LSRs, BellSouth met the benchmark on both LSRs.

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

There were only four rejected LSRs for this sub-metric in November 2001. Such a small universe for this sub-metric does not provide a conclusive benchmark comparison. There was no CLEC activity for this sub-metric in December 2001 or January 2002.

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

There were only six LSRs rejected for this sub-metric in November 2001. Such a small universe does not produce a statistically conclusive benchmark

comparison. BellSouth met the benchmark comparison for this sub-metric in December 2001 and there was no CLEC activity for this sub-metric in January 2002.

FOC Timeliness

For LSRs submitted electronically, the benchmark is 95% of the FOCs returned within 3 hours. In November, December 2001 and January 2002, BellSouth returned 96%, 99% and 99.7%, respectively, of FOCs for electronically submitted LSRs within the 3-hour benchmark interval. For partially mechanized LSRs, the benchmark is 85% returned within 10 hours. BellSouth met the 10-hour benchmark in November, December 2001 and January 2002, with 97%, 97% and 97%, respectively, of the FOCs returned for partially mechanized LSRs returned within the 10-hour benchmark period. For LSRs submitted manually, the benchmark is 85% returned within 36 hours. In November, December 2001 and January 2002, BellSouth returned 98%, 99.7% and 99.7%, respectively, of the FOCs for manually submitted UNE LSRs within the 36-hour window. The sub-metrics that did not meet the benchmark in November, December and/or January are as follows:

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

BellSouth met the 3-hour benchmark interval for 454 of the 482 FOCs returned for this sub-metric in December 2001. The 95% benchmark required that 458 of the 482 FOCs be returned within the benchmark interval. BellSouth met the benchmark for this sub-metric in November 2001 and January 2002.

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

BellSouth met the 3-hour benchmark interval for 688 of the 788 FOCs returned for this sub-metric in November 2001. BellSouth is currently investigating apparent time-stamp discrepancies affecting some LSRs in this sub-metric. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

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

There were only three LSRs associated with this sub-metric for November 2001. Such a small universe does not provide a conclusive benchmark comparison. There was no CLEC activity for this sub-metric in December 2001 and only one LSR in January 2002, BellSouth met the benchmark for the one LSR in January.

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

There were only two LSRs returned for this sub-metric in November and four LSRs in December 2001. Such a small universe does not provide a conclusive benchmark comparison. BellSouth met the benchmark for this sub-metric in January 2002 although only one LSR was returned.

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

BellSouth met the 10-hour benchmark for this sub-metric in November and December 2001. In January BellSouth met 57 of the 71 orders. This was only three orders short of the 60 orders required to be returned to meet the 85% benchmark.

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

BellSouth met the standard criteria for 15 of the 16 responses for this sub-metric in November 2001. With a 95% benchmark and a universe size of 16 orders, problems with even one response causes a miss for the entire sub-metric. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

FOC & Reject Response Completeness / xDSL / TAG / Electronic (B.1.14.5.2) (November)

BellSouth met the standard criteria for 17 of the 22 responses for this sub-metric in November 2001. The 95% benchmark required that 21 of the 22 orders meet the criteria. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

FOC & Reject Response Completeness / Line Sharing / EDI / Electronic (B.1.14.7.1) (November)

There was only one order for this sub-metric in November 2001. The small universe size for this sub-metric does not provide a conclusive benchmark comparison. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

FOC & Reject Response Completeness / 2w Analog Loop Non-Design / TAG / Electronic (B.1.14.9.2) (November/December)

There was only one order for this sub-metric in November and two orders in December 2001. The small universe size for this sub-metric does not provide a conclusive benchmark comparison. Although BellSouth met the benchmark for this sub-metric in January 2002, there were only two orders.

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

BellSouth met the standard criteria for 10 of the 12 responses for this sub-metric in December 2001. The 95% benchmark required that all 12 of the 12 orders meet the criteria. BellSouth met the benchmark for this sub-metric in November 2001 and January 2002.

FOC & Reject Response Completeness / Line Sharing / TAG / Partial Electronic (B.1.15.7.2) (November/January)

BellSouth met the standard criteria for 12 of the 13 responses for this sub-metric in November 2001 and 13 of the 14 responses in January 2002. With a 95% benchmark and a universe size of 13 and 14 orders respectively, problems with even one response causes a miss for the entire sub-metric. BellSouth met the benchmark for this sub-metric in December 2001.

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

BellSouth met the standard criteria for 114 of the 121 responses for this sub-metric in November, 129 of the 139 responses returned in December 2001 and 131 of the 138 responses returned in January 2002. The 95% benchmark required that 115 of the 121 orders for November, 133 of the 139

orders for December and 132 of the 138 orders for January to meet the benchmark criteria.

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

BellSouth met the standard criteria for 35 of the 38 responses for this sub-metric in November 2001 and 18 of the 20 responses in January 2002. The 95% benchmark required that 37 of the 38 orders meet the criteria in November and 19 of the 20 responses meet the criteria in January. BellSouth met the benchmark for this sub-metric in December 2001.

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

BellSouth met the benchmark standard for 36 of the 38 responses for this sub-metric in November 2001 and 35 of the 37 responses in January 2002. The 95% benchmark required that 37 of the 38 orders and 36 of the 37 orders meet the criteria respectively. BellSouth met the benchmark for this sub-metric in December 2001.

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

BellSouth met the criteria for 27 of the 30 responses returned in November, 23 of the 28 responses for December 2001 and 18 of the 19 responses for January 2002. The 95% benchmark set requirements of 29 of the 30 responses in November, 27 of 28 responses in December and 18 of the 19 responses in January 2002 based on the quantity of orders for this sub-metric. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark.

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

BellSouth met the benchmark standard for 42 of the 49 responses for this sub-metric in December 2001 and 26 of the 28 responses in January 2002. The 95% benchmark required that 47 of the 49 and 27 of the 28 responses respectively meet the standard criteria. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark. BellSouth met the benchmark for this sub-metric in November 2001.

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

BellSouth met the benchmark standard for 71 of the 78 responses for this sub-metric in November 2001. The 95% benchmark required that 75 of the

78 responses meet the standard criteria. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

FOC & Reject Response Completeness / INP (Standalone) / Manual (B.1.16.16) (November)

There were only seven orders for this sub-metric in November 2001. The small universe size for this sub-metric does not provide a conclusive benchmark comparison. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

Flow-Through

Attachment 1H, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated by customer type and for the Summary/Aggregate. Detailed flow-through results for individual CLECs are included in Attachment 2H. The following table shows the Regional Flow-Through results for November, December 2001 and January 2002 as compared with the Interim SQM benchmarks.

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

Customer Type	November 2001	December 2001	January 2002	Benchmark
Residence	89.40%	89.50%	88.56%	95%
Business	75.18%	74.07%	74.56%	90%

UNE	79.66%	82.67%	85.50%	85%
LNP	91.24%	87.62%	92.81%	85%

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

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

2. UNE Provisioning Measures

BellSouth met 96% of the overall UNE Provisioning measurements in November, 97% in December 2001 and 94% in January 2002 for sub-metrics having CLEC activity. The following sub-metrics did not meet the applicable retail analogues in the months of November, December 2001 and/or January 2002:

Order Completion Interval / Other Non-Design / < 10 Circuits / Non-Dispatch (B.2.1.15.1.2) (January)

Although BellSouth missed the standard for this sub-metric in January 2002, there was only one order in this category. This is not sufficient volume to determine a pattern of disparate performance. There was no activity in December 2001 and BellSouth met the standard in November 2001.

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

There was only one order for this sub-metric in December 2001. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. There was no CLEC activity for this sub-metric in either November 2001 or January 2002.

% Missed Installation Appointments / Loop and Port Combo / < 10 Circuits / Dispatch (B.2.18.3.1.4) (January)

Although BellSouth missed the standard for this sub-metric in January 2002, the miss was by only 0.25%. BellSouth met the standard in both November and December 2001. There is no evidence that BellSouth is providing disparate performance for this sub-metric.

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

There were 13 total troubles reported for this sub-metric for the 122 orders completed in the 30 days prior to November and 9 troubles reported for the 81 orders completed in the 30 days prior to December 2001. Six of the thirteen trouble reports for November and five of the nine trouble reports for December were closed as "no trouble found." Excluding these NTF reports, the results for the CLECs would have been better than for the BellSouth retail analogue for both months. BellSouth met the retail analogue comparisons for this sub-metric in January 2002.

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

There were 26 total troubles reported for this sub-metric for the 563 orders completed in the 30 days prior to December 2001. Of the 26 total trouble reports, 11 reports (42%) were closed and "no trouble found." Excluding

these NTF reports, the results for the CLECs would have been better than for the BellSouth retail analogue. BellSouth met the retail analogue comparison for this sub-metric in November 2001 and January 2002.

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

BellSouth met the standard criteria for 284 of the 300 orders reviewed for this sub-metric in November 2001. This was only one order short of the 285 orders required by the 95% benchmark for the month of November 2001, based on the number of orders reviewed for the sub-metric. BellSouth met the benchmark comparison for this sub-metric in December 2001 and January 2002.

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

BellSouth met the standard for 49 of the 58 orders reviewed in this sub-metric for November 2001. The 95% benchmark set a requirement of 56 orders for the month, based on the quantity of orders for this sub-metric. BellSouth met the benchmark comparison for this sub-metric in December 2001 and January 2002.

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

BellSouth met the applicable performance standards for 91% of UNE M&R sub-metrics for November, 94% for December 2001 and 92% for January 2002 of the overall UNE M&R measurements. The UNE M&R sub-metrics that did not meet the fixed critical value for this checklist item are as follows:

Customer Trouble Report Rate / Other Design / Dispatch (B.3.2.10.1) (January)

There was only one trouble in January 2002 for 32 lines in service. This was insufficient volume to be statistically significant. BellSouth met the standard for this sub-metric in both November and December 2001.

Customer Trouble Report Rate / Other Design / Non-Dispatch (B.3.2.10.2) (January)

There was only one trouble in January 2002 for 32 lines in service. This was insufficient volume to be statistically significant. BellSouth met the standard for this sub-metric in both November and December 2001.

Customer Trouble Report Rate / Other Non-Design / Dispatch (B.3.2.11.1) (November/December/January)

There were 10 trouble reports for the 256 lines in service in November, 11 trouble reports in December for the 115 lines in service and 6 trouble reports for the 115 lines in service in January 2002. Both the CLECs and BellSouth retail received over 95% trouble free service for this sub-metric in November 2001, over 90% in December and over 95% in January 2002.

Customer Trouble Report Rate / Other Non-Design / Non-Dispatch (B.3.2.11.2) (November/December/January)

There were 6 troubles reported for the 256 lines in service for this sub-metric in November, 6 troubles reported for the 115 lines in services in December 2001 and 3 troubles for the 115 lines in service in January 2002. Both the CLECs and BellSouth retail had greater than 97% trouble free service for all in service lines in this sub-metric in November. Of the 6 trouble reports for December, 3 reports (50%) were closed as “no trouble found.” Excluding these reports, the results for the CLEC lines in service would have been greater than 97% trouble free for December as well. In January, the CLECs received over 97% trouble free service.

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

The average duration for the 105 repair orders for this sub-metric in November was 8.39 hours as compared to the duration for the retail analogue of 5.90 hours. Of the 105 repair orders, 73, or 70%, were closed as "no trouble found." Nine of the remaining troubles were due to one carrier system failure that required 39 hours to repair (charged as 351 total hours for the 9 circuits). BellSouth met the retail analogue comparison for this sub-metric in December 2001 and January 2002.

<u>% Repeat Troubles within 30 Days / Combo Other / Dispatch (B.3.4.4.1) (November)</u>

There was only one order for this sub-metric in November 2001. The small universe size for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in December 2001 and January 2002.

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

Of the 43 service-affecting troubles reported in November, 11 were out of service longer than 24 hours. Nine of the eleven troubles were due to one carrier system failure that required 39 hours to repair. BellSouth met the retail

analogue comparison for this sub-metric in December 2001 and January 2002.

UNE – Billing

Invoice Accuracy (B.4.1) (December)

The CLECs experienced UNE invoice accuracy rates that were slightly less than the rates for the invoices BellSouth sent to its retail customers during December 2001 (98.55% accuracy for BellSouth versus 81.43% for the CLEC invoices). The difference in performance was the result of some incorrect rates being used to bill one customer. In an effort to minimize the number of incorrect rates that are used to bill our customers, BellSouth has put a process in place to verify and clean up its rate databases and rate templates. BellSouth met the standard for this sub-metric in both November 2001 and January 2002.

4. Other UNE Measures

Pre-Ordering

Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1) and Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering

measurements. All measures that had CLEC activity met the benchmarks for November, December 2001 and/or January 2002 except for the following:

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

BellSouth returned 3 of the 4 service inquiry requests in less than the 5 business day benchmark interval in November 2001. Such a 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 December 2001 and BellSouth met the benchmark for this sub-metric in January 2002.

Operations Support Systems

The OSS/Preordering measures for which BellSouth did not meet the benchmark/retail analogue in November, December 2001 and/or January 2002 were:

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

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

The CLECs received slightly longer response times from this system in November 2001 than for the retail analogue standard (6+ seconds average for CLECS compared to 4+ to 5+ seconds for BellSouth). One November transaction was reported as having a duration of approximately three days,

while the average for all the rest of the transactions was less than one second. BellSouth is investigating the cause of the reported long duration transaction. BellSouth met the retail analogue comparison for these sub-metrics in December 2001 and January 2002.

Average Response Interval / CRIS / Region (D.2.4.1.)
(November/December/January)

The average response interval for this sub-metric is measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. The average response interval for the CLEC requests did not meet the retail analogue intervals for the less than 4-second disaggregation but exceeded both the less than 10 and greater than 10 seconds responses. For the 4-second interval, there was only approximately 1% difference between the CLEC responses as compared with the retail analogue in all three months. Both the CLECs and the retail analogue received approximately 99% or more within the less than 10 second response interval. Similarly, for the greater than 10 seconds interval measure, the CLECs and the BellSouth retail analogue received approximately 1% or less of responses in over 10 seconds. These very small differences in response intervals indicate equivalent service levels for the CLECs and BellSouth retail.

Average Response Interval / DLR / Region (D.2.4.3) (D.2.5.3) (D.2.6.3) (January)

The average response intervals for these sub-metrics are measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. During the three months November 2001 through January 2002, BellSouth met or exceeded the standard for all levels of disaggregation each month with one exception. In January 2002, BellSouth missed the standard for percentage of queries responded to in less than 4 seconds. Even though BellSouth technically missed the standard the difference in performance for the CLECs versus BellSouth's retail analogue was only 1.4%. There is no evidence of disparate performance for this sub-metric.

Average Response Interval / LMOS / Region (D.2.4.4, D.2.5.4., D.2.6.4) (November/December)

The average response intervals for these sub-metrics are measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. For all three measurements, the results were virtually identical in December, with all the measures being less than 1% apart. In November, the difference

in the less than 4-second interval responses was less than 2%, while the differences in the less than 10-second and greater than 10-second interval responses were less than 0.5%. These results indicate virtually equivalent service levels for both the CLECs and BellSouth retail. In January 2002, BellSouth met the standard for all three sub-metrics.

Average Response Interval / LMOSupd / Region (D.2.4.5, D.2.5.5, D.2.6.5) (November/December/January)

The average response interval for this sub-metric is measured in three separate disaggregations. The percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. For each of the three sub-metrics, there was less than a 5% difference in the responses received by the CLECs and BellSouth retail in each month, November 2001 through January 2002. Differences of about 5%, or less, for all of these intervals indicate virtually equivalent service levels for both the CLECs and BellSouth retail.

Average Response Interval / LNP/ Region (D.2.4.6) (November/December/January)

Average Response Interval / LNP/ Region (D.2.5.6, D.2.6.6) (November)

The average response interval for this measurement is measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. In both December 2001 and January 2002, the average response interval for the CLEC requests did not meet the retail analogue intervals for the less than 4-second disaggregation but exceeded both the less than 10 and greater than 10 seconds responses. In December 2001 and January 2002, both the CLECs and BellSouth retail received over 98.8% of responses in less than 4 seconds and less than 0.3% in more than 10 seconds. The less than one percent difference for these intervals indicates virtually equivalent service levels for the CLECs and BellSouth retail.

Average Response Interval / MARCH / Region (D.2.4.7, D.2.5.7, D.2.6.7) (November/December)

The average response interval for this sub-metric is measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. BellSouth missed the retail analogue comparison for this measure in November and December but met the retail analogue comparison for these sub-metrics in January 2002.

Average Response Interval / OSPCM / Region (D.2.4.8, D.2.5.8, D.2.6.8) (December/January)

The average response interval for these sub-metrics is measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. In December 2001, the CLEC response interval was 63.38% within 4 seconds as compared to 76.69% for the retail analogue. In January 2002, the CLEC response interval was 13.92% compared to 26.31% for the retail analogue. For the less than 10 second response interval, the CLECs received 92.96% of their responses and the retail analogue received 98.29% in December and 94.94% versus 96.71% respectively in January 2002. For the greater than 10 second response interval, the CLECs received 7.04% of their responses and the retail analogue received 1.71% in December and 5.06% versus 3.29% respectively in January 2002. BellSouth met the retail analogue comparison for all three of these sub-metrics in November 2001 and two out of three in January 2002.

Average Response Interval / SOCS / Region (D.2.4.10, D.2.5.10, D.2.6.10) (December)

The average response interval for these sub-metrics is measured in three separate disaggregations -- the percentage of queries that are responded to

in less than 4 seconds, less than 10 seconds and greater than 10 seconds. In December 2001, the CLEC response interval was 98.70% within 4 seconds as compared to 99.75% for the retail analogue. For the less than 10 second response interval, the CLECs received 98.87% of their responses and the retail analogue received 99.91% in December. For the greater than 10 second response interval, the CLECs received 1.13% of their responses and the retail analogue received 0.09% in December. The differences between BellSouth retail results and CLEC results were only about 1% for each time period. BellSouth met the retail analogue comparison for all three of these sub-metrics in November 2001 and January 2002.

Average Response Interval / NIW / Region (D.2.4.11) (January)

The average response interval for this sub-metric is measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. In January 2002, the average response interval for the CLEC requests did not meet the retail analogue intervals for the less than 4-second disaggregation but exceeded both the less than 10 and greater than 10 seconds responses. The CLEC response interval was 85.67% within 4 seconds in January, as compared with 87.02% for the retail analogue. The small difference between the CLEC and retail analogue results should not impede the CLECs' ability to

compete in this area. BellSouth met the retail analogue comparison for this sub-metric in November and December 2001.

General – Billing

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

This measure tracks the percentage of usage data delivered within six calendar days for both BellSouth retail and the CLEC aggregate. The CLECs experienced usage data delivery timeliness rates that were slightly lower than the rates for BellSouth customers during November and December 2001 (for November, 98.89% for BellSouth compared to 98.37% for CLECs, and for December, 99.24% for BellSouth compared to 98.90% for CLECs). The difference in performance for November was the result of some input files being left out of the ADUF job before the files were recovered and processed. The difference in performance for December was the result of usage processing delays caused by system problems that occurred during the initial conversion of usage records to the format used with BellSouth's Integrated Billing Solution (IBS) project. Manual processes were temporarily put into place during the conversion to ensure that all usage data was correctly converted, processed and verified. This problem should not re-occur since the initial usage conversions for all BellSouth states have now been completed. It is important to point out that the CLEC result of 98+% still

provides the CLECs a meaningful opportunity to compete. BellSouth met the retail analogue comparison for this sub-metric in January 2002.

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

This measure tracks the percentage of usage data delivered within thirty calendar days for both BellSouth retail and the CLEC aggregate. The CLECs experienced usage data delivery timeliness rates that were slightly lower than the rates for BellSouth customers during November and December 2001 (for November, 99.85% for BellSouth compared to 99.54% for CLECs, and for December, 99.80% for BellSouth compared to 99.70% for CLECs). The difference in performance for November was the result of some input files being left out of the ADUF job before the files were recovered and processed. The difference in performance for December was the result of usage processing delays caused by system problems that occurred during the initial conversion of usage records to the format used with BellSouth's Integrated Billing Solution (IBS) project. Manual processes were temporarily put into place during the conversion to ensure that all usage data was correctly converted, processed and verified. This problem should not re-occur since the initial usage conversions for all BellSouth states have now been completed. It is important to point out that the CLEC result of 99+% still

provides the CLECs a meaningful opportunity to compete. BellSouth met the retail analogue comparison for this sub-metric in January 2002.

Recurring Charge Completeness / Interconnection (F.9.5.3) (January)

This measure tracks the ability of the ordering and billing systems to begin billing a CLEC recurring charges for local interconnection services on the next invoice after an order has "completed". For local interconnection orders, the goal is to meet a benchmark of 90%. In January 2002, the result was 88.44%. The benchmark was not met in January due to problems encountered by BellSouth in correcting some service order errors in a timely manner. A corrective action plan was put into place in November 2001 to improve service order error correction timeliness. This plan requires ordering center managers to strictly monitor the service orders that are worked on a daily basis and to refer any errors that remain unresolved for an extensive period of time to the center director for handling. BellSouth continues to monitor results and will adjust procedures as necessary to further improve this metric. BellSouth met the benchmark for this sub-metric in November and December 2001. Therefore, there is no evidence that demonstrates that CLECs do not have an equal opportunity to compete.

Non-Recurring Charge Completeness – Resale (F.9.6.1) (January)

This measure tracks the ability of the ordering and billing systems to begin billing a CLEC non-recurring charges for resale services on the next invoice after an order has "completed". For resale orders, the goal is to meet a benchmark of 90%. In January 2002, the result was 70.10%. The benchmark was not met in January because of back-billed OSS charges applied to CLEC accounts. These OSS charges are due to BellSouth for handling LSRs that were cancelled by CLEC customers. In the past, BellSouth's systems have not been equipped to apply these cancellation charges. During 2002, BellSouth plans to complete an initiative to bill these OSS charges on a current basis for cancelled LSRs. BellSouth met the standard for this sub-metric in both November and December 2001.

<u>Non-Recurring Charge Completeness – UNE (F.9.6.2) (January)</u>

This measure tracks the ability of the ordering and billing systems to begin billing a CLEC non-recurring charges for UNE services on the next invoice after an order has "completed". For UNE orders, the goal is to meet a benchmark of 90%. In January 2002, the result was 74.93%. The benchmark was not met in January because of backbilled OSS charges applied to CLEC accounts. These OSS charges are due to BellSouth for handling LSRs that were cancelled by CLEC customers. In the past, BellSouth's systems have not been equipped to apply these cancellation

charges. During 2002, BellSouth plans to complete an initiative to bill these OSS charges on a current basis for cancelled LSRs. BellSouth met the standard for this sub-metric in both November and December 2001.

Non-Recurring Charge Completeness – Interconnection (F.9.6.3.1) (January)

This measure tracks the ability of the ordering and billing systems to begin billing a CLEC non-recurring charges for local interconnection services on the next invoice after an order has "completed". For local interconnection orders, the goal is to meet a benchmark of 90%. In January 2002, the result was 47.50%. The benchmark was not met in January because of two main reasons. The first reason is related to backbilled OSS charges applied to CLEC accounts. These OSS charges are due to BellSouth for handling LSRs that were cancelled by CLEC customers. In the past, BellSouth's systems have not been equipped to apply these cancellation charges. During 2002, BellSouth plans to complete an initiative to bill these OSS charges on a current basis for cancelled LSRs.

The second reason is related to problems encountered in correcting service order errors in a timely manner. In an effort to prevent this problem from occurring in the future, BellSouth has made revisions to error handling procedures that will allow errors to be recognized, worked and resolved in a

timelier manner. BellSouth met the standard for this sub-metric in both November and December 2001.

General - Change Management

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

BellSouth met the benchmark intervals for all releases in November 2001. There were no releases for this sub-metric in December 2001 and BellSouth met the benchmark for one of the two releases in January 2002. However, such extremely low volumes are insufficient evidence to indicate that CLECs opportunity to compete is negatively impacted by this sub-metric.

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

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

There was only one Change Management Documentation notice issued in November and four notices issued in December 2001. The notice for November and two of the notices for December did not meet the standard notice interval. In January 2002, there were two Change Management Documents, both of which were sent on time with no delay days.

General – Ordering

% Acknowledgement Message Completeness / TAG (F.12.2.2)

(December/January)

BellSouth failed to deliver 1 (0.0003%) of the 302,925 messages in December 2001 for this sub-metric and 1 (0.00026) of the 379,170 messages for this sub-metric in January 2002. Analysis continues to identify any issues in this process. However, such a small number of failed records have not revealed any systemic process problems. BellSouth met the benchmark for this sub-metric in November 2001.

D. CHECKLIST ITEM 4 – UNBUNDLED LOCAL LOOPS

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

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

xDSL Group

1. Provisioning Measures

The provisioning sub-metrics that did not meet the retail analogues in November 2001, December 2001 and/or January 2002 are as follows:

% Jeopardies / xDSL (ADSL, HDSL and UCL) / Electronic (B.2.5.5) (January)

There were only thirteen orders for this sub-metric in January 2002. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the standard for this sub-metric in both November and December 2001.

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

There were only two orders for this sub-metric in November 2001. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue for this sub-metric in December 2001 and January 2002.

2. Maintenance & Repair Measures

Customer Trouble Report Rate / UNE ISDN / Dispatch (B.3.2.6.1)
(November/December/January)

The CLEC aggregate reported 20 troubles for the 578 lines in service for this sub-metric in November, 11 troubles for the 580 lines in service in December 2001 and 9 troubles for the 586 lines in service in January 2002. Both the CLECs and BellSouth retail had greater than 96% trouble free service for all in service lines in this sub-metric in November and greater than 98% trouble free service in December 2001 and January 2002.

Customer Trouble Report Rate / Line Sharing / Non-Dispatch (B.3.2.7.2)
(November/December/January)

The CLEC aggregate reported 21 troubles for this sub-metric in November, 26 troubles in December 2001 and 18 troubles for January 2002. All of the trouble reports in November and December were issued by one CLEC, and 14 of the 21 reports for November and 20 of the 26 reports for December were closed as “no trouble found.” In December, 4 lines were reported 10 times with all 10 reports being closed as “no trouble found.” In January 2002, there were only 18 trouble reports on an installed base of 359 lines. This represents a 95% trouble free rate for CLECs.

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

There were only two trouble reports for this sub-metric in November and two reports for December 2001. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in January 2002.

% Repeat Troubles within 30 Days / UNE Other Design / Non-Dispatch (B.3.4.10.2) (November)

Although BellSouth missed the standard for this sub-metric in January 2002, there was only one repeat trouble, which is not sufficient volume to be statistically valid. BellSouth met the standard for this sub-metric in both November and December 2001.

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

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

met the retail analogue comparison for this sub-metric in December 2001 and January 2002.

SL1/SL2/Digital Loop Group

The provisioning and maintenance and repair sub-metrics that did not meet the retail analogue for this group in November, December 2001 and/or January 2002 are:

1. Provisioning Measures

% Jeopardies / Digital Loop < DS1 / Electronic (B.2.5.18) (January)

There were only thirteen orders for this sub-metric in January 2002. The small universe size for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the standard for this sub-metric in November and December 2001.

% Jeopardies / Digital Loop >= DS1 / Electronic (B.2.5.19) (November/December/January)

There were only 7 orders for this sub-metric in November, 9 orders in December 2001 and 19 orders in January 2002. Even though 5 of the 7 orders for November, 4 of the 9 orders for December and 6 of the 19 orders

for January were shown in jeopardy status, all of the jeopardies for each of the three months were resolved prior to the due dates and the orders were completed as scheduled. The small universe size for this sub-metric does not provide a statistically conclusive comparison to the retail analogue.

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

There were only six orders for this sub-metric in November 2001. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in both December 2001 and January 2002.

Average Completion Notice Interval / 2W Analog Loop w/LNP Design/ < 10 Circuits / Dispatch (B.2.21.12.1.1) (January)

Although BellSouth missed the standard for this sub-metric in January 2002, there was only one order, which does not represent a statistically valid sample. BellSouth met the standard in December 2001 and there was no CLEC activity in November 2001.

2. Maintenance & Repair Measures

Customer Trouble Report Rate / 2W Analog Loop Non-Design / Dispatch (B.3.2.7.2) (January)

In January 2002 there were only 2 trouble reports on 19 lines. This is insufficient volume of activity for a statistically valid sample. BellSouth met the standard for this sub-metric in both November and December 2001.

E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT

The data in these measures indicate that BellSouth met the benchmark/analogue requirements for all measurements in Checklist Item 5 for November, December 2001 and January 2002.

F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING

The data in these measures indicate that BellSouth met the benchmark/analogue requirements for all measurements in Checklist Item 6 for November, December 2001 and January 2002.

G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES

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

As indicated in Attachment 1H, Sections F.6, F.7 and F.8, BellSouth met the benchmark/analogue requirements of Checklist Items 7a and 7b in November, December 2001 and January 2002. Even though BellSouth tracks and reports these measures, the processes used in providing these services are designed to provide parity for all users.

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

BellSouth met the required benchmarks for four of the four sub-metrics associated with this checklist item in November, December 2001 and January 2002. See items F.13.1.1 through F.13.3 in Attachment 1H for further details.

J. CHECKLIST ITEM 11 – NUMBER PORTABILITY

All the measurements in this Checklist Item were met or exceeded for November, December 2001 and/or January 2002 except for the following:

Order Completion Interval / INP Standalone / < 10 Circuits / Non-Dispatch (B.2.1.16.1.2) (January)

Although BellSouth missed the standard for this sub-metric in January 2002, there was only one order in this category. This is not sufficient volume to determine a pattern of disparate performance. There was no activity in December 2001 and BellSouth met the standard in November 2001.

Order Completion Interval / LNP Standalone / < 10 Circuits / Non-Dispatch (B.2.1.17.2.2) (January)

Although BellSouth missed the standard for this sub-metric in January 2002, there were only four orders in this category. This is not sufficient volume to determine a pattern of disparate performance. There was no activity in November 2001 and BellSouth met the standard in December 2001.

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

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

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

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

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

K. CHECKLIST ITEM 14 – RESALE

BellSouth met or exceeded the benchmarks or retail analogues for 84% of the Resale sub-metrics having CLEC activity in November 2001. In December 2001, BellSouth met or exceeded the benchmarks/analogues for 88% of the resale sub-metrics and in January 2002, BellSouth met or exceeded 87% of the resale sub-metrics. The details for the January 2002 data are delineated in Attachment 1H, Items A.1.1.1.1 through A.4.2.

During the three-month period from November 2001 through January 2002, there were 140 Resale sub-metrics that had data for all three months and were compared to benchmarks or retail analogues. Of those 140 sub-metrics, 126 (90%) sub-metrics met the relevant criteria in at least two of the three months.

1. Resale Ordering Measures

FOC Timeliness

In November 2001, BellSouth returned FOCs for 7,692 Resale LSRs and met the relevant benchmark on 99% of all FOCs. Of the 7,692 LSRs, 6,555 were fully mechanized with 99.8% meeting the 3-hour benchmark. In December 2001, BellSouth returned FOCs for 7,020 Resale LSRs and met the relevant benchmark on 98% of them. Of the 7,020 LSRs, 5,907 were fully mechanized with 99.7% meeting the 3-hour benchmark. In January 2002, BellSouth returned FOCs for 8,516 Resale LSRs and met the relevant benchmark on 99% of them. Of the 8,516 LSRs, 7,268 were fully mechanized with 100% meeting the 3-hour benchmark. See Attachment 1H, Sections A.1.9 through A.1.13 for further details.

Reject Interval

In November 2001, 1,291 LSRs were rejected, with 96% returned within the relevant benchmark period. Of the LSRs rejected in November, 57% were submitted electronically with 95% returned within the 1-hour benchmark. In December 2001, 1,167 LSRs were rejected, with 96% returned within the relevant benchmark period. Of the LSRs rejected in December, 56% were submitted electronically with 96% returned within the 1-hour benchmark. In January 2002, 1,227 LSRs were rejected, with 96% returned within the relevant benchmark period. Of the LSRs rejected in January, 56% were

submitted electronically with 97% returned within the 1-hour benchmark. See Attachment 1H, Items A.1.4 through A.1.8 for further details.

The Resale Ordering sub-metrics for which BellSouth did not meet the benchmarks/analogues for November, December 2001 and/or January 2002 were:

Reject Interval / Residence / Electronic (A.1.4.1) (November/December)

Reject Interval / Business / Electronic (A.1.4.2) (November/December)

The current benchmark for electronic rejects is >= 97% within one hour. BellSouth's root cause analysis determined that a number of LSRs that did not meet the one-hour benchmark were submitted when back-end legacy systems were out of service and were unable to process the LSRs. Because such LSRs should be excluded from the measurement, BellSouth implemented a coding change in PMAP to ensure that scheduled OSS downtime was properly excluded. This change was made with September 2001 data and was expected to improve sub-metric results for Reject Interval performance.

The coding change assumed that EDI and TAG timestamps reflected Eastern Time. However, the timestamps used by EDI and TAG actually reflects

Central time. As a result of this discrepancy, an hour is being added during PMAP timestamp "synchronization," which causes the results to inaccurately reflect the reject Interval duration. A change to address this issue for EDI is scheduled for implementation with February 2002 data, and BellSouth is in the process of scheduling a similar change for TAG. BellSouth's root cause analysis has determined that, had the scheduled OSS downtime exclusion been properly implemented, BellSouth's Reject Interval performance would generally have met the Commission's benchmark.

BellSouth's root cause analysis also identified an additional issue that impacts the electronic Reject Interval sub-metrics. This issue arises when a fully mechanized Firm Order Confirmation ("FOC") is followed by a manual Clarification, a scenario that occurs when the Local Carrier Service Center ("LCSC") must resolve specific types of errors after the issuance of the FOC. This issue distorts the timeliness of BellSouth's electronic reject notices, and BellSouth is currently analyzing this situation to determine an appropriate solution. BellSouth met the benchmark for both of these sub-metrics in January 2002.

<u>Reject Interval / Design (Specials) / Electronic (A.1.4.3) (November)</u>

There were only two rejected LSRs for this sub-metric in November 2001. The small universe for this sub-metric does not provide a conclusive benchmark comparison. There was no CLEC activity for this sub-metric in December 2001 or January 2002.

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

BellSouth met the 10-hour benchmark for 80 of the 105 FOCs returned for this sub-metric in December 2001. The 85% benchmark required that 90 of the 105 FOCs be returned within the benchmark interval. BellSouth met the benchmark for this sub-metric in November 2001 and January 2002.

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

There were only two LSRs associated with this sub-metric in November and one LSR in December 2001. The small universe of orders for this sub-metric does not provide a conclusive benchmark comparison. BellSouth met the benchmark for this sub-metric in January 2002.

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

There were only 5 orders associated with this sub-metric in December 2001. Such a small universe does not provide a conclusive benchmark comparison.

BellSouth met the benchmark comparison for this sub-metric in November 2001 and January 2002.

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

There were only 12 FOCs returned for this sub-metric 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 December 2001 and January 2002.

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

There were only three orders for this sub-metric 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 December 2001 or January 2002.

FOC & Reject Response Completeness / Residence / Manual (A.1.16.1) (November/December/January)

BellSouth met the benchmark standard for this sub-metric 125 of the 134 responses in November, 75 of the 82 responses returned in December 2001 and 109 of the 117 responses in January 2002. The 95% benchmark

required that 128 of the 134 responses for November, 78 of the 82 responses for December and 111 of the 117 responses for January meet the criteria. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark.

FOC & Reject Response Completeness / Business / Manual (A.1.16.2) (November/December/January)

BellSouth met the benchmark standard for 79 of the 84 responses for this sub-metric in November, for 87 of the 107 responses returned in December 2001 and for 126 of the 145 responses returned in January 2002. The 95% benchmark required that 80 of the 84 responses for November, 102 of the 107 responses for December and 138 of the 145 responses for January meet the criteria. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark.

FOC & Reject Response Completeness / Design (Specials) / Manual (A.1.16.3) (November)

BellSouth met the benchmark standard for 41 of the 57 responses for this sub-metric in November 2001. The 95% benchmark required that 55 of the 57 responses in November meet the criteria. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark.

BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

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

There were only eight orders for this sub-metric in November and four orders in December 2001. The small universe of orders for this sub-metric does not provide a conclusive benchmark comparison. BellSouth met the benchmark for this sub-metric in January 2002.

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

BellSouth met the benchmark standard for 6 of the 7 responses for this sub-metric in December 2001. With a universe size of only 7 orders and a 95% benchmark, a problem with only one order causes a miss for the entire sub-metric. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark. BellSouth met the benchmark for this sub-metric in November 2001 and January 2002.

2. Resale Provisioning Measures

BellSouth met or exceeded the benchmark or retail analogue for 91% of all Resale provisioning measures in November, 92% in December 2001 and 87% in January 2002. The details supporting the January percentage are delineated in Items A.2.1.1.1.1 through A.2.25.3.2.2 of Attachment 1H.

Resale provisioning sub-metrics for which BellSouth did not meet the benchmark/retail analogue in November, December 2001 and/or January 2002 were:

<u>% Jeopardies / Residence / Electronic (A.2.4.1) (January)</u>

BellSouth completed as scheduled over 99% of the installation appointments for this sub-metric in January. There were no systemic installation issues identified for the 16 orders placed in jeopardy status in January. Only two of the jeopardies in this sub-metric resulted in held orders. BellSouth met the retail analogue comparison for this sub-metric in November and December 2001.

<u>% Provisioning Troubles within 30 Days / Residence / < 10 Circuits / Non-Dispatch (A.2.12.1.1.2) (November/December/January)</u>

For the period November 2001 through January 2002, less than 5% of the orders completed for this sub-metric in the prior 30 days had trouble reports in

the following month. In November, 49 of the 206 trouble reports (24%) were closed as "TOK/FOK." In December, 41 of the 182 trouble reports (23%) were closed as "TOK/FOK." In January, 48 of the 187 trouble reports (26%) were closed as "TOK/FOK." With a reduction in the number of reports that end up as "no trouble found" incidents, the results for CLEC orders would be virtually the same as the results for the BellSouth retail analogue. Analysis of the troubles found for this sub-metric revealed that a majority was related to cable and drop facilities distributed throughout the state with no distinct pattern or trend.

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

In December 2001, there were 6 troubles reported for the 49 orders completed in the prior 30 days. In January 2002, there were 5 troubles reported for the 48 orders completed in the prior 30 days. There was no systemic pattern to the troubles reported in either December 2001 or January 2002. BellSouth met the retail analogue comparison for this sub-metric in November 2001.

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

There were only three orders for this sub-metric in November 2001. The small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in December 2001 and January 2002.

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

There were only 74 orders reviewed for this sub-metric in January 2002. Of the 74 orders reviewed, 67 were accurate. Had three additional orders been found to be accurate (70), BellSouth would have met the 95% benchmark for this sub-metric in January 2002. BellSouth met the benchmark for this sub-metric in November and December 2001.

Service Order Accuracy / Residence / >= 10 Circuits / Dispatch (A.2.25.1.2.1) (January)

There were only 11 orders reviewed for this sub-metric in January 2002. Of the 11 orders reviewed, 10 were accurate. Had one additional order been found to be accurate (11), BellSouth would have exceeded the 95% benchmark for this sub-metric in January 2002. Thus, the small volume of orders in this sub-metric is not sufficient to determine disparate performance.

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

Service Order Accuracy / Business / < 10 Circuits / Dispatch (A.2.25.2.1.1) (January)

BellSouth met the standard for 109 of the 125 orders reviewed in this sub-metric for January 2002. The 95% benchmark set a requirement of 119 of the 125 orders, based on the quantity of orders for this sub-metric. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark. BellSouth met or exceeded the benchmark for this sub-metric in November and December 2001.

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

BellSouth met the standard for 69 of the 74 orders reviewed in this sub-metric for January 2002. The 95% benchmark set a requirement of 70 of the 74 orders, based on the quantity of orders for this sub-metric. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark. BellSouth met or exceeded the benchmark for this sub-metric in November and December 2001.

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

BellSouth met the standard for 21 of the 23 orders reviewed in this sub-metric for November, 14 of the 17 orders reviewed in December 2001 and 11 of the 12 orders reviewed in January 2002. The 95% benchmark set requirements of 22 of the 23 orders for November, all 17 of the 17 orders in December and all 12 of the 12 orders in January 2002, based on the quantity of orders for this sub-metric. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark.

Service Order Accuracy / Business / >= 10 Circuits / Non-Dispatch (A.2.25.2.2.2) (November/December/January)

BellSouth met the standard for 29 of the 31 orders reviewed in this sub-metric for November, for 22 of the 28 orders reviewed in December 2001 and for 17 of the 20 orders reviewed in January 2002. The 95% benchmark set a requirement of 30 of the 31 orders for November, 27 of the 28 orders for December and 19 of the 20 orders for January 2002, based on the quantity of orders for this sub-metric. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark.

Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch (A.2.25.3.1.1) (November/December)

BellSouth met the standard for 45 of the 50 orders reviewed in this sub-metric for November and for 56 of the 63 orders reviewed in December 2001. The 95% benchmark set requirements of 48 of the 50 orders for November and for 60 of the 63 orders for December, based on the quantity of orders for this sub-metric. BellSouth continues to focus on this measurement in order to improve results to meet the benchmark. BellSouth met or exceeded the benchmark for this sub-metric in January 2002.

Service Order Accuracy / Design (Specials) / < 10 Circuits / Non-Dispatch (A.2.25.3.1.2) (November)

BellSouth met the standard for 52 of the 55 orders reviewed for this sub-metric in November 2001. The 95% benchmark set a requirement of 53 orders based on the quantity of orders for this sub-metric. BellSouth met the benchmark for this sub-metric in December 2001 and January 2002.

Service Order Accuracy / Design (Specials) / >= 10 Circuits / Non-Dispatch (A.2.25.3.2.2) (January)

BellSouth met the standard for 7 of the 10 orders reviewed for this sub-metric in January 2002. The 95% benchmark set a requirement of 10 orders based

on the quantity of orders for this sub-metric. Therefore a volume of 10 orders is too few to accurately assess disparate performance. BellSouth met the benchmark for this sub-metric in November and December 2001.

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

BellSouth met the relevant retail analogue comparisons for 90% of all the Resale Maintenance & Repair measurements in November, 92% in December 2001 and 89% in January 2002. The sub-metrics for which BellSouth did not meet the retail analogues in November, December 2001 and/or January 2002 were:

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

In November 2001, the CLECs had over 97% trouble free service for all the lines in service for this sub-metric. The trouble report rate for CLECs for this sub-metric was approximately 0.2% higher than for the retail analogue in November. In November, 43 of the trouble reports were closed as "TOK/FOK." Excluding these reports, the CLEC trouble report rate would have been the same as, or less than for BellSouth retail. In January 2002, the CLECs once again had over 97% trouble free service and the difference

between the CLEC trouble report rate and the retail analogue was only 0.3%. BellSouth met the retail analogue comparison for this sub-metric in December 2001.

Customer Trouble Report Rate / Business / Dispatch (A.3.2.2.1) (January)

In January the CLECs had over 98% trouble free service for this sub-metric and although BellSouth missed the standard, the difference between the trouble report rate for the CLECs and the retail analogue was only 0.3%. BellSouth met the standard for this sub-metric in both November and December 2001.

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

In December 2001, the CLECs had over 99% trouble free service for the 7,066 lines in service for this sub-metric. Of the 45 trouble reports issued for this sub-metric in December, 31 reports (69%) were closed as “no trouble found.” Excluding these NTF reports, the results for the CLEC orders would have been better than for the BellSouth retail analogue. BellSouth met the retail analogue comparison for this sub-metric in November 2001 and January 2002.

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

There were only 9 trouble reports for the 699 lines in service for this sub-metric in November and 3 trouble reports for the 546 lines in service in December 2001. BellSouth provided 98% to 99% trouble free service for the in-service lines in this sub-metric for both CLECs and BellSouth retail customers in both months. When BellSouth provisions high quality service coupled with very large universe sizes, it can cause an apparent out of equity condition from a quantitative viewpoint. In these cases, there is very little variation and the universe size is so large that the Z-test becomes overly sensitive to any difference. In other words, the statistical test shows that the measurement does not meet the fixed critical value when compared with the retail analogue, but BellSouth's actual performance for both CLECs and its own retail operations is at a very high level – often 98% or 99%. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in January 2002.

Customer Trouble Report Rate / Centrex / Dispatch (A.3.2.5.1) (January)

There were 26 trouble reports in January 2002 for the 555 lines in service for this sub-metric. BellSouth provided 95% trouble free service for both retail and the CLECs for this sub-metric for October. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in November and December 2001.

Customer Trouble Report Rate / Centrex / Non-Dispatch (A.3.2.5.2) (January)

There were 3 trouble reports in January 2002 for the 555 lines in service for this sub-metric. BellSouth provided 99% trouble free service for both retail and the CLECs for this sub-metric for October. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in November and December 2001.

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

There were only 2 trouble reports for the 596 lines in service for this sub-metric in January 2002. BellSouth provided over 99% trouble free service for both retail and the CLECs for this sub-metric in January. From a practical

point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in November and December 2001.

Customer Trouble Report Rate / ISDN / Non-Dispatch (A.3.2.6.2) (January)

There were only 3 trouble reports for the 596 lines in service for this sub-metric in January 2002. BellSouth provided over 99% trouble free service for both retail and the CLECs for this sub-metric in January. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in November and December 2001.

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

This measure was missed in November due to six trouble reports received from one customer at one location. A BellSouth repair technician was dispatched the following day but could not gain access to the premises. The customer did not provide access until six days later. All six reports were closed as "no trouble found." Excluding these six long duration but no trouble found reports, BellSouth would have met the retail analogue comparison for

November. BellSouth met the retail analogue comparison for this sub-metric in December 2001 and January 2002.

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

There were only nine trouble reports for this sub-metric in November 2001. The small universe for this measurement does not provide a statistically conclusive comparison with the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in December 2001 and January 2002.

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

There was only one trouble report for this sub-metric in December 2001. The small universe for this measurement does not provide a statistically conclusive comparison with the retail analogue. BellSouth met or exceeded the retail analogue for this sub-metric in November 2001 and January 2002.

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

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

conclusive comparison with the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in November 2001 and January 2002.

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

There were nine repair orders out of service longer than 24 hours for this sub-metric in November 2001. As discussed in Item A.3.3.2.1, six of the nine reports were dispatched is less than 24 hours, but the technician was unable to gain access to the premises until six days later. Excluding these reports, the result for the CLECs and BellSouth retail would have been virtually the same for the month. BellSouth met the retail analogue for this sub-metric in December 2001 and January 2002.

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

There were only seven repair orders associated with this sub-metric in November 2001. Such a small universe of orders for this sub-metric does not provide a statistically conclusive comparison to the retail analogue. BellSouth met the retail analogue comparison for this sub-metric in December 2001 and January 2002.

Resale – Billing

Invoice Accuracy (A.4.1) (January)

The CLECs experienced resale invoice accuracy rates that were less than the rates for the invoices BellSouth sent to its retail customers during January 2002 (99.42% accuracy for BellSouth versus 98.12% for the CLEC invoices). The difference in performance was the result of Other Charges and Credits (OC&Cs) that were issued in January to recover E911 billing for November 2001. BellSouth failed to bill E911 for November 2001 because of computer program errors. As a preventative action plan, BellSouth will improve the process it uses to test program changes. BellSouth met the standard for this sub-metric in both November and December 2001. Therefore, there is no evidence of a pattern of disparate performance.

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

The CLECs experienced Resale invoice delivery rates that were slightly higher than the rates for BellSouth's retail customers during December 2001 (3.67 days for BellSouth versus 3.84 days for CLECS). The small difference in performance was the result of recent shifts in workloads within the BellSouth Bill Distribution department. BellSouth met the standard for this sub-metric in November 2001 and January 2002.

III. Summary

As stated in the Introduction to the Analysis of Performance Measurements section, BellSouth met or exceeded the benchmarks/retail analogues for 545 of the 616 sub-metrics (88%) for which there was CLEC activity in December 2001. In November 2001, 597 of 702 sub-metrics (85%) met or exceeded the benchmarks or retail analogues. BellSouth met or exceeded the criteria for 562 of the 627 sub-metrics (90%) for which there was CLEC activity in January 2002.

During the three-month period, November 2001 through January 2002, excluding the measures discussed in the Introduction, there were a total of 544 sub-metrics that had CLEC activity for all three months and that were compared with either benchmarks or retail analogues. Of these 544 sub-metrics, 491 sub-metrics (90%) satisfied the comparison criteria during at least two of the three months.