

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 February 2002. The performance data for Kentucky is
7 provided in Attachment 1I. In addition, Attachments 2 and 3 to Exhibit AJV-6,
8 filed originally on July 10, 2001, have been updated for February 2002 data
9 and are attached to this supplemental exhibit as Attachments 2I and 3I.
10 Attachments 4, 5 and 6 to Exhibit AJV-6 have not been modified, and are,
11 therefore, not included in this supplemental exhibit.

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

14
15 **A. Introduction**

16
17 Attachment 1I is the Monthly State Summary (MSS) for Kentucky for February
18 2001. The February MSS contains 2,327 sub-metrics. In February 2002,
19 BellSouth met or exceeded the comparison criteria for 550 of the 604 sub-
20 metrics, or 91%, that had CLEC activity and were compared to benchmarks
21 or retail analogues.

1 As explained in previous updates to this Exhibit, three of the measures were
2 identified by BellSouth as having deficiencies in their calculations and were
3 investigated and evaluated for appropriate program code corrections. These
4 three measures were Average Jeopardy Notice Interval, FOC & Reject
5 Completeness (including the "Multiple Responses" sub-metrics), and LNP
6 Disconnect Timeliness. Program coding modifications have been completed
7 for the FOC and Reject Completeness measure. A variation on the FOC &
8 Reject Response Completeness (O-11) measurement, FOC/Reject
9 Completeness (Multiple Responses), indicates the proportion of times that
10 multiple FOCs/Rejects for an LSR are returned. The Georgia PSC did not
11 order this measure to be implemented. Also, this measurement can be
12 misleading because sometimes multiple responses are required for efficient
13 operation of the business, such as when a second FOC is returned to notify a
14 CLEC when a jeopardy was cleared. Consequently, while BellSouth reports
15 data on this measure in the Monthly State Summary, BellSouth has not
16 included it in the calculation of performance measurements that had CLEC
17 activity. Coding changes for the Average Jeopardy Notice Interval measures
18 are still being developed. The LNP Disconnect Timeliness measure is still
19 under review by the Georgia PSC. These measures are included in the MSS
20 and in the total number of measurements calculation (2,327), but are
21 excluded from the "Met/Total" (550/604) percentage calculations.

22

1 During the three-month period, December 2001 through February 2002, again
2 adjusting for the measures mentioned above where appropriate, there were a
3 total of 541 sub-metrics that had CLEC activity for all three months and that
4 were compared with either benchmarks or retail analogues. Of these 541
5 sub-metrics, 497 sub-metrics (92%) satisfied the comparison criteria in at
6 least two of the three months.

7

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

13

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

16

17 **B. CHECKLIST ITEM 1 – INTERCONNECTION**

18

19 **1. Collocation**

20 BellSouth provides three separate collocation reports: 1) Average Response
21 Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.

22 Section E in Attachment 1I, Items E.1.1.1 through E.1.3.3, provides these

1 results. BellSouth met the approved benchmarks for all of the sub-metrics
2 with CLEC activity in December 2001, January and February 2002.

3

4 **2. Local Interconnection Trunking**

5 Trunking Reports

6 Attachment 1I, Section C, Items C.1.1 to C.4.2 of the February MSS contains
7 data for ordering, provisioning, maintenance and repair, and billing associated
8 with Local Interconnection Trunks.

9

10 In December 2001, January 2002 and February 2002, BellSouth met the
11 benchmarks/retail analogue comparisons for 18 of the 24, 22 of the 24 and all
12 24 of the 24, respectively, local interconnection trunking sub-metrics having
13 CLEC activity. The sub-metrics that did not meet the retail analogue
14 comparison in December 2001 and January 2002 are as follows:

15

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

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

21

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

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

5

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

7 (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 the retail
11 analogue comparison for this sub-metric in February 2002. There was no
12 CLEC activity for this sub-metric in January 2002.

13

14 Customer Trouble Report Rate / Local Interconnection Trunks / Dispatch

15 (C.3.2.1) (December)

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

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

3

4 Maintenance Average Duration / Local Interconnection Trunks / Dispatch

5 (C.3.3.1) (December)

6 There was only one trouble report for this sub-metric in December 2001. The
7 one trouble report for December was incorrectly coded by the BellSouth
8 technician as “no trouble found.” The report should have been coded
9 “information only” and excluded from the measurement since the CLEC
10 reported an invalid telephone number. BellSouth spent 10.65 hours trying to
11 identify a nonexistent problem. If coded appropriately, BellSouth would have
12 met the retail analogue comparison for this sub-metric in December 2001.
13 BellSouth met or exceeded the retail analogue comparison for this sub-metric
14 in January and February 2002.

15

16 Maintenance Average Duration / Local Interconnection Trunks / Non-Dispatch

17 (C.3.3.2) (January)

18 There were only three trouble reports for this sub-metric in January 2002.
19 The small universe of orders does not provide a statistically conclusive
20 comparison to the retail analogue. BellSouth met or exceeded the retail
21 analogue comparison for this sub-metric in December 2001 and February
22 2002.

1

2 % Repeat Troubles within 30 Days / Local Interconnection Trunks / Non-
3 Dispatch (C.3.4.2) (January)

4 There were only three trouble reports for this sub-metric in January 2002.
5 The small universe of orders does not provide a statistically conclusive
6 comparison to the retail analogue. BellSouth met or exceeded the retail
7 analogue comparison for this sub-metric in December 2001 and February
8 2002.

9

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

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

20

21 Trunk Blockage

1 BellSouth has developed a trunk blocking report that compares BellSouth
2 retail's trunk blockage rates to those of CLECs. The report, Trunk Group
3 Performance Report (TGP), Attachment 3I, displays trunk blocking in a
4 manner that accurately represents the customer experience. The TGP report
5 tabulates actual call blocking as a percentage of call attempts for all
6 comparable trunk groups administered by BellSouth that handle CLEC and
7 BellSouth traffic. The TGP report provides a direct comparison of hour-by-
8 hour blocking between CLEC and BellSouth trunk groups. Attachment 3I,
9 Item C.5.1 (TGP), shows the actual trunk blocking percentages by hour for
10 February 2002. The Analogue/Benchmark for the Trunk Group Performance
11 measure is any consecutive two-hour period in 24 hours where CLEC
12 blockage exceeds BellSouth blockage by more than 0.5%. BellSouth met or
13 exceeded the retail analogue for this sub-metric in December 2001, January
14 2002 and February 2002.

15
16 **C. CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)**

17
18 This section addresses the measures associated with UNEs under checklist
19 item 2. Attachment 1I, Sections B1 – B3, provides data that is divided into
20 Ordering, Provisioning and Maintenance & Repair operations. The Ordering
21 function is disaggregated into 17 sub-metrics. The Provisioning function has
22 19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair

1 function. All Ordering measures will be included in this checklist item
2 because of the overall relationship of the mechanized, partially mechanized
3 and manual processing of Local Service Requests (LSRs). The Provisioning
4 and Maintenance & Repair measures for the following products are included
5 in the checklist item as shown below:

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

1	Switch Ports	#6 – Unbundled Local Switching
2	INP Standalone	#11 – Local Number Portability
3	LNP Standalone	#11 – Local Number Portability

4

5 An overall review of the UNE sub-metrics for Ordering, Provisioning,
6 Maintenance & Repair and Billing indicates that BellSouth met the
7 benchmark/analogue for 94% of the sub-metrics during February 2002, 94%
8 of the sub-metrics in January 2002 and 93% of the sub-metrics in December
9 2001.

10

11 During the three-month period from December 2001 through February 2002,
12 there were 265 UNE sub-metrics that had data for all three months and were
13 compared to benchmarks or retail analogues. Of those 265 sub-metrics, 252
14 (95%) sub-metrics met the relevant criteria in at least two of the three months.

15

16 **1. UNE Ordering Measures**

17

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

22

1 **Reject Interval**

2 Items B.1.4 - B.1.8 in Attachment 1I examine the Reject Interval for the month
3 of February 2002. For orders submitted electronically, the benchmark is 97%
4 within one hour. In December 2001 and January 2002, 93% and 97%,
5 respectively, of the rejected service requests were delivered within the one-
6 hour time period. In February 2002, 94% of rejected UNE electronic LSRs
7 were returned within the one-hour benchmark.

8

9 For partially mechanized orders, the benchmark is 85% within 10 hours.
10 BellSouth exceeded the benchmark in December 2001, January 2002 and
11 February 2002 with 95%, 96% and 96%, respectively, of rejects for partially
12 mechanized LSRs returned within the benchmark period.

13

14 For manual orders, the current benchmark is 85% within 24 hours. BellSouth
15 also exceeded this requirement in each of the three months, with 98% of the
16 LSRs submitted manually being returned to the CLECs within the 24-hour
17 time period in December 2001 and January 2002. BellSouth returned 100%
18 of the rejects for manually submitted LSRs within the 24-hour interval in
19 February 2002.

20

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

1

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

3 (December/January/February)

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

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

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

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

8 such LSRs should be excluded from the measurement, BellSouth

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

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

11 2001 data and was expected to improve sub-metric results for Reject Interval

12 performance.

13

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

15 Time. However, the timestamps used by EDI and TAG actually reflect

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

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

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

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

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

21 analysis has determined that, had the scheduled OSS downtime exclusion

1 been properly implemented, BellSouth's Reject Interval performance would
2 generally have met the Commission's benchmark.

3

4 BellSouth's root cause analysis also identified an additional issue that impacts
5 the electronic Reject Interval sub-metrics. This issue arises when a fully
6 mechanized Firm Order Confirmation ("FOC") is followed by a manual
7 Clarification, a scenario that occurs when the Local Carrier Service Center
8 ("LCSC") must resolve specific types of errors after the issuance of the FOC.

9 This issue distorts the timeliness of BellSouth's electronic reject notices, and
10 BellSouth is currently analyzing this situation to determine an appropriate
11 solution.

12

13 Reject Interval / xDSL / Electronic (B.1.4.5) (January)

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

18

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

20 (December/January/February)

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

4

5 Reject Interval / 2w Analog Loop Design / Electronic (B.1.4.8) (February)

6 There were only six orders for this sub-metric in February 2002. The small
7 universe of orders for this sub-metric does not provide a conclusive
8 benchmark comparison. There was no CLEC activity for this sub-metric in
9 December 2001. BellSouth met the benchmark for this sub-metric in January
10 2002.

11

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

13 There were only nine rejected LSRs for this sub-metric in January 2002.
14 Such a small universe for this sub-metric does not provide a conclusive
15 benchmark comparison. BellSouth met the benchmark for this sub-metric in
16 December 2001. In February 2002, BellSouth returned 13 of the 15 rejected
17 LSRs within the 1-hour benchmark interval. See Item B.1.4.3 for additional
18 information on reject intervals for electronically submitted LSRs.

19

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

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

1 Exchange Ordering (LEO) System to the CLEC ordering interface system
2 (TAG or EDI). However, with this change, BellSouth is currently unable to
3 identify multiple issues of the same version of LSRs that have been rejected
4 (fatal rejects). These rejected LSRs should be excluded from the
5 measurement. If there are multiple issues of the same version, the measure
6 currently calculates the interval from the initial issue to the final issue of the
7 LSR returned to the CLEC, Reject or FOC. Consequently, BellSouth's
8 performance level is inappropriately understated. BellSouth is currently
9 working to determine a fix for this issue. BellSouth met the benchmark for
10 this measurement in January and February 2002.

11
12 Reject Interval / Line Sharing / Partially Mechanized (B.1.7.7) (December)

13 There were only five LSRs rejected for this sub-metric in December 2001.
14 The small universe of orders during the month does not provide a conclusive
15 benchmark comparison. BellSouth met the benchmark for this sub-metric in
16 January and February 2002.

17
18 FOC Timeliness

19 For LSRs submitted electronically, the benchmark is 95% of the FOCs
20 returned within 3 hours. In December 2001, January and February 2002,
21 BellSouth returned over 99% of FOCs for electronically submitted LSRs within
22 the 3-hour benchmark interval. For partially mechanized LSRs, the

1 benchmark is 85% returned within 10 hours. BellSouth met the 10-hour
2 benchmark in December 2001, January and February 2002, with 97%, 97%
3 and 93%, respectively, of the FOCs returned for partially mechanized LSRs
4 returned within the 10-hour benchmark period. For LSRs submitted manually,
5 the benchmark is 85% returned within 36 hours. In December 2001, January
6 and February 2002, BellSouth returned 99.7%, 99.7% and 100%,
7 respectively, of the FOCs for manually submitted UNE LSRs within the 36-
8 hour window. The sub-metrics that did not meet the benchmark in December
9 2001, January and/or February 2002 are as follows:

10
11 FOC Timeliness / Other Non-Design / Electronic (B.1.9.15) (December)

12 BellSouth met the 3-hour benchmark interval for 454 of the 482 FOCs
13 returned for this sub-metric in December 2001. The 95% benchmark required
14 that 458 of the 482 FOCs be returned within the benchmark interval.
15 BellSouth met the benchmark for this sub-metric in January and February
16 2002.

17
18 FOC Timeliness / 2w Analog Loop w/LNP Design / Partial Electronic

19 (B.1.12.12) (December)

20 There were only four LSRs returned for this sub-metric in December 2001.
21 Such a small universe does not provide a conclusive benchmark comparison.

1 BellSouth met the benchmark for this sub-metric in January 2002. There was
2 no CLEC activity for this sub-metric in February 2002.

3

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

5 BellSouth met the 10-hour benchmark for this sub-metric in December 2001
6 and February 2002. In January 2002, BellSouth met 57 of the 71 orders.
7 This was only three orders short of the 60 orders required to meet the 85%
8 benchmark.

9

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

12 There were only two orders for this sub-metric in December 2001. The small
13 universe size for this sub-metric does not provide a conclusive benchmark
14 comparison. BellSouth met the benchmark for this sub-metric in January and
15 February 2002.

16

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

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

1

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

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

9

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

12 BellSouth met the standard criteria for 129 of the 139 responses for this sub-
13 metric in December 2001 and 131 of the 138 responses returned in January
14 2002. The 95% benchmark required that 133 of the 139 orders for December
15 and 132 of the 138 orders for January meet the benchmark criteria.
16 BellSouth met the benchmark for this sub-metric in February 2002.

17

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

20 BellSouth met the standard criteria for 18 of the 20 responses for this sub-
21 metric in January 2002. The 95% benchmark required that 19 of the 20

1 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
2 December 2001 and February 2002.

3

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

6 BellSouth met the benchmark standard for 35 of the 37 responses for this
7 sub-metric in January 2002. The 95% benchmark required that 36 of the 37
8 orders meet the criteria. BellSouth met the benchmark for this sub-metric in
9 December 2001 and February 2002.

10

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

13 BellSouth met the criteria for 23 of the 28 responses for this sub-metric
14 returned in December 2001 and for 18 of the 19 responses for January 2002.
15 The 95% benchmark set requirements of 27 of the 28 responses in December
16 and all 19 of the 19 responses in January 2002 based on the quantity of
17 orders for this sub-metric. BellSouth met the benchmark for this sub-metric in
18 February 2002.

19

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

1 BellSouth met the benchmark standard for 42 of the 49 responses for this
2 sub-metric in December 2001 and 26 of the 28 responses in January 2002.
3 The 95% benchmark required that 47 of the 49 and 27 of the 28 responses
4 respectively meet the standard criteria. BellSouth met the benchmark for this
5 sub-metric in February 2002.

6

7 Flow-Through

8 Attachment 11, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated
9 by customer type and for the Summary/Aggregate. Detailed flow-through
10 results for individual CLECs are included in Attachment 21. The following
11 table shows the Regional Flow-Through results for December 2001, January
12 and February 2002 as compared with the Interim SQM benchmarks.

13

14 % Flow-through Service Requests (F.1.1.1 – F.1.3.4)

<u>Customer Type</u>	<u>December 2001</u>	<u>January 2002</u>	<u>February 2002</u>	<u>Benchmark</u>
Residence	89.50%	88.56%	87.17%	95%
Business	74.07%	74.56%	75.20%	90%
UNE	82.67%	85.50%	84.86%	85%
LNP	87.62%	92.81%	94.12%	85%

15

16 The table above excludes those LSRs designed to “fall out” for manual
17 handling. The business flow-through rate is well below the 90% objective.

1 Business LSRs are more complex than the typical LSRs and, as a result,
2 there is a greater probability for error. For example, an LSR requesting 10
3 lines with series completion hunting that are located over multiple floors and
4 have a variation of features on the lines presents many more opportunities for
5 system mismatches than one that adds just lines and features.

6

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

15

16 **2. UNE Provisioning Measures**

17 BellSouth met 97% of the overall UNE Provisioning measurements in
18 December 2001, 94% in January 2002 and 92% in February 2002 for sub-
19 metrics having CLEC activity. The following sub-metrics did not meet the
20 applicable retail analogues in the months of December 2001, January and/or
21 February 2002:

22

1 Order Completion Interval / Other Non-Design / < 10 Circuits / Non-Dispatch

2 (B.2.1.15.1.2) (January)

3 There was only one order for this sub-metric in January 2002. The small
4 universe of orders for this sub-metric does not provide a statistically
5 conclusive comparison to the retail analogue. There was no CLEC activity for
6 this sub-metric in December 2001. BellSouth met the retail analogue
7 comparison for this sub-metric in February 2002.

8

9 % Jeopardies / Combo Other / Electronic (B.2.5.4) (December)

10 There was only one order for this sub-metric in December 2001 and only
11 three orders in February 2002. The small universe of orders for this sub-
12 metric does not provide a statistically conclusive comparison to the retail
13 analogue. There was no CLEC activity for this sub-metric in January 2002.

14

15 % Missed Installation Appointments / Loop and Port Combo / < 10 Circuits /

16 Dispatch (B.2.18.3.1.4) (January)

17 Although BellSouth missed the standard for this sub-metric in January 2002,
18 the miss was by only 0.25%. BellSouth met the standard in both December
19 2001 and February 2002.

20

21 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /

22 Dispatch (B.2.19.3.1.1) (December/February)

1 There were 9 total troubles reported for this sub-metric for the 81 orders
2 completed in the 30 days prior to December 2001 and 10 troubles reported
3 for the 89 orders completed in the 30 days prior to February 2002. Five of the
4 nine trouble reports for December and five of the ten trouble reports for
5 February were closed as “no trouble found.” Excluding these NTF reports,
6 the results for the CLECs would have been better than for the BellSouth retail
7 analogue for both months. BellSouth met the retail analogue comparisons for
8 this sub-metric in January 2002.

9

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

12 There were 26 total troubles reported for this sub-metric for the 563 orders
13 completed in the 30 days prior to December 2001 and 29 trouble reports for
14 the 723 orders completed in the 30 days prior to February 2002. Of the 26
15 December trouble reports, 11 reports (42%) were closed and “no trouble
16 found.” Of the 29 February trouble reports, 7 reports (24X%) were closed and
17 “no trouble found.” Excluding these NTF reports, the results for the CLECs
18 would have been very close to the results for the BellSouth retail analogue.
19 BellSouth met the retail analogue comparison for this sub-metric in January
20 2002.

21

1 % Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch

2 (B.2.19.4.1.1) (February)

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

8

9 % Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch

10 In (B.2.19.4.1.4) (February)

11 There were only nine orders for this sub-metric in February 2002. The small
12 universe of orders for this sub-metric does not provide a statistically
13 conclusive comparison to the retail analogue. There was no CLEC activity for
14 this sub-metric in either December 2001 or January 2002.

15

16 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Dispatch

17 (B.2.34.1.2.1) (February)

18 BellSouth met the standard criteria for 27 of the 29 orders reviewed for this
19 sub-metric in February 2002. This was only one order short of the 28 orders
20 required by the 95% benchmark, based on the number of orders reviewed for
21 the sub-metric. BellSouth met the benchmark comparison for this sub-metric
22 in December 2001 and January 2002.

1

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

3 BellSouth met the applicable performance standards for 94% of UNE M&R
4 sub-metrics for December 2001, 92% for January 2002 and 97% for February
5 2002 of the overall UNE M&R measurements. The UNE M&R sub-metrics
6 that did not meet the fixed critical value for this checklist item are as follows:

7

8 Missed Repair Appointments / Other Non-Design / Dispatch (B.3.1.11.1)

9 (February)

10 There were only three orders for this sub-metric in February 2002. The small
11 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 December 2001 and January
14 2002.

15

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

17 (January)

18 There was only one trouble in January 2002 for 32 lines in service. The small
19 universe of orders for this sub-metric does not provide a statistically
20 conclusive comparison to the retail analogue. BellSouth met the standard for
21 this sub-metric in December 2001 and February 2002.

22

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

2 (January)

3 There was only one trouble in January 2002 for 32 lines in service. The small
4 universe of orders for this sub-metric does not provide a statistically
5 conclusive comparison to the retail analogue. BellSouth met the standard for
6 this sub-metric in December 2001 and February 2002.

7

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

9 (December/January)

10 There were 11 trouble reports for this sub-metric for the 115 lines in service in
11 December 2001 and 6 trouble reports for the 115 lines in service in January
12 2002. Both the CLECs and BellSouth retail received over 90% trouble free
13 service for this sub-metric in December and over 95% in January 2002.
14 BellSouth met the retail analogue comparison for this sub-metric in February
15 2002.

16

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

18 (B.3.2.11.2) (December/January)

19 There were 6 troubles reported for this sub-metric for the 115 lines in service
20 for this sub-metric in December 2001 and 3 troubles for the 115 lines in
21 service in January 2002. Of the 6 trouble reports for December, 3 reports
22 (50%) were closed as “no trouble found.” Excluding these reports, the results

1 for the CLEC lines in service would have been greater than 97% trouble free
2 for December. In January, the CLECs received over 97% trouble free
3 service. BellSouth met the retail analogue comparison for this sub-metric in
4 February 2002.

5

6 % Repeat Troubles within 30 Days / Other Design / Non-Dispatch (B.3.4.10.2)
7 (January)

8 There was only one repeat trouble report for this sub-metric in February 2002.

9 The small universe for this sub-metric does not provide a statistically
10 conclusive comparison to the retail analogue. BellSouth met the retail
11 analogue comparison for this sub-metric in December 2001 and February
12 2002.

13

14 Out of Service > 24 Hours / Other Non-Design / Dispatch (B.3.5.11.1)
15 (February)

16 There was only one service-affecting trouble reported in February 2002. The
17 small universe for this sub-metric does not provide a statistically conclusive
18 comparison to the retail analogue. BellSouth met the retail analogue
19 comparison for this sub-metric in December 2001 and January 2002.

20

21 **UNE – Billing**

22 Invoice Accuracy (B.4.1) (December)

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

9

10 Mean Time to Deliver Invoices – CRIS / Region (B.4.2) (February)

11 This metric measures the mean interval for timeliness of billing records
12 delivered to CLECs. The CLECs experienced UNE invoice delivery rates that
13 were higher than the rates for BellSouth's retail customers during February
14 2002 (3.64 days for BellSouth versus 6.13 for CLECs). The difference in
15 performance was the result of bill period delays encountered with BellSouth's
16 billing system upgrade associated with UNE CLEC bills and usage volumes.
17 Processing cycles ran longer than expected. BellSouth is currently working
18 on enhancements that will decrease processing time and speed the delivery
19 of bills that will help to improve performance for this metric. BellSouth met the
20 retail analogue comparison for this sub-metric in December 2001 and January
21 2002.

22

1 **4. Other UNE Measures**

2

3 **Pre-Ordering**

4 Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1) and
5 Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering
6 measurements. All measures that had CLEC activity met the benchmarks for
7 December 2001, January and February 2002.

8

9 **Operations Support Systems**

10 The OSS/Preordering measures for which BellSouth did not meet the
11 benchmark/retail analogue in December 2001, January 2002 and/or February
12 2002 were:

13

14 Average Response Interval / CRSECSRL / ROS / Region (D.1.3.5.2)
15 (February)

16 The CLECs received slightly longer response times from this system in
17 February 2002 than for the retail analogue standard (3.77 seconds average
18 for CLECS compared to 3.11 seconds for BellSouth). BellSouth is currently
19 investigating the data underlying the results for this sub-metric to identify the
20 cause for the miss in this measurement. BellSouth met the retail analogue
21 comparison for this sub-metric in December 2001 and January 2002.

22

1 Average Response Interval / CRIS / Region (D.2.4.1.)

2 (December/January/February)

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 / DLR / Region (D.2.4.3) (January/February)

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

1 BellSouth missed the standard for percentage of queries responded to in less
2 than 4 seconds during January and February 2002, but met the standards for
3 both the “less than 10 seconds” and “greater than ten seconds” intervals.
4 Even though BellSouth technically missed the standard the difference in
5 performance for the CLECs versus BellSouth’s retail analogue was only 1.4%
6 in January and 2.4% in February. There is no evidence of disparate
7 performance for this sub-metric.

8

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

10 (December)

11 The average response intervals for these sub-metrics are measured in three
12 separate disaggregations -- the percentage of queries that are responded to
13 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
14 For all three measurements, the results were virtually identical in December,
15 with all the measures being less than 1% apart. These results indicate
16 virtually equivalent service levels for both the CLECs and BellSouth retail. In
17 both January and February 2002, BellSouth met the standard for all three
18 sub-metrics.

19

20 Average Response Interval / LMOSupd / Region (D.2.4.5, D.2.5.5, D.2.6.5)

21 (December/January/February)

1 The average response interval for this sub-metric 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 For each of the three sub-metrics, there was less than a 5% difference in the
5 responses received by the CLECs and BellSouth retail in each month,
6 December 2001 through February 2002. Differences of about 5%, or less,
7 for all of these intervals indicate virtually equivalent service levels for both the
8 CLECs and BellSouth retail.

9

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

11 The average response interval for this measurement is measured in three
12 separate disaggregations -- the percentage of queries that are responded to
13 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
14 In both December 2001 and January 2002, the average response interval for
15 the CLEC requests did not meet the retail analogue intervals for the less than
16 4-second disaggregation but exceeded both the less than 10 and greater than
17 10 seconds responses. In December 2001 and January 2002, both the
18 CLECs and BellSouth retail received over 98.8% of responses in less than 4
19 seconds and less than 0.3% in more than 10 seconds. The less than one
20 percent difference for these intervals indicates virtually equivalent service
21 levels for the CLECs and BellSouth retail.

22

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

2 (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 BellSouth missed the retail analogue comparison for this measure in
7 December 2001 but met the retail analogue comparison for these sub-metrics
8 in January and February 2002.

9

10 Average Response Interval / OSPCM / Region (D.2.4.8) (December/January)

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

12 The average response interval for these sub-metrics is measured in three
13 separate disaggregations -- the percentage of queries that are responded to
14 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
15 In December 2001, the CLEC response interval was 63.38% within 4 seconds
16 as compared to 76.69% for the retail analogue. In January 2002, the CLEC
17 response interval was 13.92% compared to 26.31% for the retail analogue.
18 For the less than 10 second response interval, the CLECs received 92.96% of
19 their responses and the retail analogue received 98.29% in December and
20 94.94% versus 96.71% respectively in January 2002. For the greater than 10
21 second response interval, the CLECs received 7.04% of their responses and
22 the retail analogue received 1.71% in December and 5.06% versus 3.29%

1 respectively in January 2002. BellSouth met the retail analogue comparison
2 for all three of these sub-metrics in February 2002 and two out of three in
3 January 2002.

4

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

6 (December)

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

19

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

21 The average response interval for this sub-metric 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 January 2002, the average response interval for the CLEC requests did not
3 meet the retail analogue intervals for the less than 4-second disaggregation
4 but exceeded both the less than 10 and greater than 10 seconds responses.
5 The CLEC response interval was 85.67% within 4 seconds in January, as
6 compared with 87.02% for the retail analogue. The small difference between
7 the CLEC and retail analogue results should not impede the CLECs' ability to
8 compete in this area. BellSouth met the retail analogue comparison for this
9 sub-metric in December 2001 and February 2002.

10

11 **General – Maintenance Center**

12 **Average Answer Time / Region (F.5.1) (February)**

13 BellSouth is currently investigating the February 2002 data underlying this
14 sub-metric to determine the cause of the fluctuations in the average answer
15 time for the retail analogue and its relationship to answer times for the
16 CLECs. BellSouth met the retail analogue comparison for this sub-metric in
17 December 2001 and January 2002.

18

19 **General – Billing**

20 **Usage Data Delivery Timeliness (F.9.1) (February)**

21 This measure compares the rate at which error-free usage data is sent to
22 CLECs with the same measure for the BellSouth retail analog. The CLECs

1 experienced usage data delivery accuracy rates that were slightly lower than
2 the rates for BellSouth customers during February 2002 (99.85% for
3 BellSouth versus 99.62% for CLECs). The difference in performance was the
4 result of a problem with ODUF pack sequence numbers. This problem did
5 not involve any missing or incorrect usage data from ODUF. The problem
6 only involved ODUF pack sequence numbers which normally go in sequence
7 from '01' to '99' for each customer. After a system problem occurred with the
8 output sequence table on February 19, 2002, the sequence numbers were
9 inadvertently restarted to '01' on all ODUFs for all CLECs. The sequence
10 table was corrected, and the correct pack number for each customer was
11 restarted on February 22, 2002. All CLECs, who questioned BellSouth about
12 this problem, reported that they understood that no usage data was actually
13 missing or incorrect as a result of the problem, and none of the CLECs
14 requested that BellSouth retransmit any ODUF data. Bellsouth met the retail
15 analogue comparison for this sub-metric in December 2001 and January
16 2002.

17
18 Usage Data Delivery Timeliness (F.9.2) (December)

19 This measure tracks the percentage of usage data delivered within six
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 December 2001 (99.24% for

1 BellSouth compared to 98.90% for CLECs). The difference in performance
2 for December was the result of usage processing delays caused by system
3 problems that occurred during the initial conversion of usage records to the
4 format used with BellSouth's Integrated Billing Solution (IBS) project. Manual
5 processes were temporarily put into place during the conversion to ensure
6 that all usage data was correctly converted, processed and verified. This
7 problem should not re-occur since the initial usage conversions for all
8 BellSouth states have now been completed. It is important to point out that
9 the CLEC result of 98+% still provides the CLECs a meaningful opportunity to
10 compete. BellSouth met the retail analogue comparison for this sub-metric in
11 January and February 2002.

12
13 Usage Data Delivery Completeness (F.9.3) (December)

14 This measure tracks the percentage of usage data delivered within thirty
15 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs
16 experienced usage data delivery timeliness rates that were slightly lower than
17 the rates for BellSouth customers during December 2001 (99.80% for
18 BellSouth compared to 99.70% for CLECs). The difference in performance
19 for December was the result of usage processing delays caused by system
20 problems that occurred during the initial conversion of usage records to the
21 format used with BellSouth's Integrated Billing Solution (IBS) project. Manual
22 processes were temporarily put into place during the conversion to ensure

1 that all usage data was correctly converted, processed and verified. This
2 problem should not re-occur since the initial usage conversions for all
3 BellSouth states have now been completed. It is important to point out that
4 the CLEC result of 99+% still provides the CLECs a meaningful opportunity to
5 compete. BellSouth met the retail analogue comparison for this sub-metric in
6 January and February 2002.

7

8 Recurring Charge Completeness / UNE (F.9.5.2) (February)

9 This measure tracks the ability of the ordering and billing systems to begin
10 billing a CLEC recurring charges for UNE services on the next invoice after an
11 order has "completed". For UNE orders, the goal is to meet a benchmark of
12 90%. In February 2002, the result was 89.37%. The benchmark was not met
13 in February because several orders were backdated to the dates that zone
14 mileage Universal Service Order Codes (USOCs) were placed on the related
15 lines. Zone mileage USOCs are not valid with the UNE Switched
16 Combination classes of service in which the accounts are categorized. These
17 mileage USOCs should have been removed when the accounts were
18 converted from either BellSouth retail or CLEC resale lines to UNE-P. As a
19 temporary corrective measure, BellSouth has zero-rated these mileage
20 USOCs on the rate file. As a permanent solution to this problem, BellSouth
21 plans to implement a LESOG (Local Exchange Service Order Generator)
22 program change in May 2002 that will mechanically remove mileage USOCs

1 when a line is converted from retail or resale to UNE-P. Bellsouth met the
2 retail analogue comparison for this sub-metric in December 2001 and January
3 2002.

4

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

6 This measure tracks the ability of the ordering and billing systems to begin
7 billing a CLEC recurring charges for local interconnection services on the next
8 invoice after an order has “completed”. For local interconnection orders, the
9 goal is to meet a benchmark of 90%. In January 2002, the result was
10 88.44%. The benchmark was not met in January due to problems
11 encountered by BellSouth in correcting some service order errors in a timely
12 manner. A corrective action plan was put into place in November 2001 to
13 improve service order error correction timeliness. This plan requires ordering
14 center managers to strictly monitor the service orders that are worked on a
15 daily basis and to refer any errors that remain unresolved for an extensive
16 period of time to the center director for handling. BellSouth continues to
17 monitor results and will adjust procedures as necessary to further improve
18 this metric. BellSouth met the benchmark for this sub-metric in December
19 2001 and February 2002. There is no evidence that demonstrates that
20 CLECs do not have an equal opportunity to compete.

21

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

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

12
13 Non-Recurring Charge Completeness – UNE (F.9.6.2) (January)

14 This measure tracks the ability of the ordering and billing systems to begin
15 billing a CLEC non-recurring charges for UNE services on the next invoice
16 after an order has “completed”. For UNE orders, the goal is to meet a
17 benchmark of 90%. In January 2002, the result was 74.93%. The
18 benchmark was not met in January because of back-billed OSS charges
19 applied to CLEC accounts. These OSS charges are due to BellSouth for
20 handling LSRs that were cancelled by CLEC customers. In the past,
21 BellSouth’s systems have not been equipped to apply these cancellation
22 charges. During 2002, BellSouth plans to complete an initiative to bill these

1 OSS charges on a current basis for cancelled LSRs. BellSouth met the
2 standard for this sub-metric in December 2001 and February 2002.

3

4 Non-Recurring Charge Completeness – Interconnection (F.9.6.3) (January)

5 This measure tracks the ability of the ordering and billing systems to begin
6 billing a CLEC non-recurring charges for local interconnection services on the
7 next invoice after an order has “completed”. For local interconnection orders,
8 the goal is to meet a benchmark of 90%. In January 2002, the result was
9 47.50%. The benchmark was not met in January because of two main
10 reasons. The first reason is related to back-billed OSS charges applied to
11 CLEC accounts. These OSS charges are due to BellSouth for handling LSRs
12 that were cancelled by CLEC customers. In the past, BellSouth’s systems
13 have not been equipped to apply these cancellation charges. During 2002,
14 BellSouth plans to complete an initiative to bill these OSS charges on a
15 current basis for cancelled LSRs.

16

17 The second reason is related to problems encountered in correcting service
18 order errors in a timely manner. In an effort to prevent this problem from
19 occurring in the future, BellSouth has made revisions to error handling
20 procedures that will allow errors to be recognized, worked and resolved in a
21 timelier manner. BellSouth met the standard for this sub-metric in December
22 2001 and February 2002.

1

2 **General - Change Management**

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

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

9

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

11 **(December/February)**

12 **Average Documentation Release Delay Days (F.10.5) (December)**

13 There were only four Change Management Documentation notices issued in
14 December 2001 and two notices issued in February 2002. Two of the four
15 notices for December did not meet the standard notice interval. In February
16 2002, both documentation release notices missed the 30-day advance
17 window but both made the 22-day “delay days” cut-off window. In January
18 2002, there were two Change Management Documents, both of which were
19 sent on time with no delay days.

20

21 **General – Ordering**

1 % Acknowledgement Message Completeness / TAG (F.12.2.2)

2 (December/January/February)

3 BellSouth failed to deliver 1 (0.0003%) of the 302,925 messages in December
4 2001 for this sub-metric, 1 (0.00026%) of the 379,170 messages for this sub-
5 metric in January 2002 and 2 (0.00059%) of the 341,453 messages in
6 February 2002. Analysis continues to identify any issues in this process.
7 However, such a small number of failed records have not revealed any
8 systemic process problems.

9

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

11

12 As discussed in Checklist Item 2, Sections B.2 and B.3 of Attachment 11
13 provide data for Provisioning and Maintenance & Repair measures for
14 unbundled local loops.

15

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

22

1 **xDSL Group**

2

3 **1. Provisioning Measures**

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

6

7 % Jeopardies / xDSL (ADSL, HDSL and UCL) / Electronic (B.2.5.5) (January)

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

12

13 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits / Non-
14 Dispatch (B.2.19.7.1.2) (February)

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

19

20 **2. Maintenance & Repair Measures**

21

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

2 (December/January)

3 The CLEC aggregate reported 11 troubles for the 580 lines in service for this
4 sub-metric in December 2001 and 9 troubles for the 586 lines in service in
5 January 2002. Both the CLECs and BellSouth retail had greater than 98%
6 trouble free service in both December 2001 and January 2002. BellSouth
7 met the retail analogue comparison for this sub-metric in February 2002.

8

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

10 (December/January)

11 The CLEC aggregate reported 26 troubles for this sub-metric in December
12 2001 and 18 troubles for January 2002. All of the trouble reports in
13 December were issued by one CLEC, and 20 of the 26 reports were closed
14 as “no trouble found.” In December, 4 lines were reported 10 times with all 10
15 reports being closed as “no trouble found.” In January 2002, there were only
16 18 trouble reports on an installed base of 359 lines. This represents a 95%
17 trouble free rate for CLECs. BellSouth met the retail analogue comparison for
18 this sub-metric in February 2002.

19

20 % Repeat Troubles within 30 Days / UNE ISDN / Non-Dispatch (B.3.4.6.2)

21 (December)

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

5

6 **SL1/SL2/Digital Loop Group**

7

8 The provisioning and maintenance and repair sub-metrics that did not meet
9 the retail analogue for this group in December 2001, January 2002 and/or
10 February 2002 were:

11

12 **1. Provisioning Measures**

13

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

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

19

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

21 **(December/January/February)**

1 There were 9 orders for this sub-metric in December 2001, 19 orders in
2 January 2002 and 26 orders in February 2002. Even though 4 of the 9 orders
3 for December, 6 of the 19 orders for January and 16 of the 26 orders for
4 February were shown in jeopardy status, all of the jeopardies for facilities
5 problems for each of the three months were resolved prior to the due dates
6 and these orders were completed as scheduled.

7

8 % Provisioning Troubles within 30 Days / 2w Analog Loop Non-Design / < 10
9 Circuits / Dispatch (B.2.19.9.1.1) (February)

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

14

15 % Provisioning Troubles within 30 Days / Digital Loop >= DS1 / < 10 Circuits /
16 Dispatch (B.2.19.19.1.1) (February)

17 There were only three troubles reported for the CLEC aggregate for this sub-
18 metric in February 2002. There were no systemic provisioning issues
19 identified for any of the three trouble reports. BellSouth met the retail
20 analogue comparison for this sub-metric in December 2001 and January
21 2002.

22

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

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

8

9 **2. Maintenance & Repair Measures**

10 Customer Trouble Report Rate / 2W Analog Loop Non-Design / Dispatch
11 (B.3.2.9.1) (January)

12 In January 2002 there were only 2 trouble reports on 19 lines. The small
13 universe of trouble reports for this sub-metric does not provide a statistically
14 conclusive comparison to the retail analogue. BellSouth met the retail
15 analogue comparison for this sub-metric in December 2001 and February
16 2002.

17

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

19

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

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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 December 2001, January and February 2002.

G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES

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

As indicated in Attachment 11, Sections F.6, F.7 and F.8, BellSouth met the benchmark/analogue requirements of Checklist Items 7a and 7b in December 2001, January and February 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

1 BellSouth met the required benchmarks for all four of the four sub-metrics
2 associated with this checklist item in December 2001, January and February
3 2002. See items F.13.1.1 through F.13.3 in Attachment 11 for further details.

4

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

6

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

9

10 Order Completion Interval / INP Standalone / < 10 Circuits / Non-Dispatch

11 (B.2.1.16.1.2) (January)

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

16

17 Order Completion Interval / LNP Standalone / < 10 Circuits / Non-Dispatch

18 (B.2.1.17.2.2) (January)

19 There were only four orders for this sub-metric in January 2002. The small
20 universe of orders for this sub-metric does not provide a statistically
21 conclusive comparison to the retail analogue. BellSouth met the retail

1 analogue comparison for this sub-metric in December 2001. There was no
2 CLEC activity for this sub-metric in February 2002.

3

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

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

10

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

19

20 As it currently exists, Performance Measure P-13 does not recognize the
21 importance of triggers and their effect on the LNP process. Rather, the
22 current measure calculates the end time of the LNP activity as the processing

1 of the actual disconnect order in the host switch, even though, from a
2 customer's perspective, this activity is totally meaningless on most LNP
3 orders. It is the activation of the LNP and the routing function accomplished
4 by the LSMS that ultimately determines whether the end user is back in full
5 service and is able to make and receive calls when a trigger is used in porting
6 a telephone number. So, while BellSouth may be missing this measure, the
7 actual impact on CLECs and their end users, for a great majority of the orders
8 is minimal, or nonexistent. The Georgia PSC is currently evaluating a change
9 in this measure that more accurately reflects the LNP process and its impacts
10 on end users, and, therefore, the measurements will be shown blank until a
11 resolution is reached on this issue.

12
13 **K. CHECKLIST ITEM 14 – RESALE**

14
15 BellSouth met or exceeded the benchmarks or retail analogues for 88% of the
16 Resale sub-metrics having CLEC activity in December 2001. In January
17 2002, BellSouth met or exceeded the benchmarks/analogues for 87% of the
18 resale sub-metrics, and in February 2002, BellSouth met or exceeded 85% of
19 the resale sub-metrics. The details for the February 2002 data are delineated
20 in Attachment 1I, Items A.1.1.1.1 through A.4.2.

21

1 During the three-month period from December 2001 through February 2002,
2 there were 138 Resale sub-metrics that had data for all three months and
3 were compared to benchmarks or retail analogues. Of those 138 sub-
4 metrics, 119 (86%) sub-metrics met the relevant criteria in at least two of the
5 three months.

6

7 **1. Resale Ordering Measures**

8 **FOC Timeliness**

9 In December 2001, BellSouth returned FOCs for 7,020 Resale LSRs and met
10 the relevant benchmark on 98% of them. Of the 7,020 LSRs, 5,907 were fully
11 mechanized with 99.7% meeting the 3-hour benchmark. In January 2002,
12 BellSouth returned FOCs for 8,516 Resale LSRs and met the relevant
13 benchmark on 99% of them. Of the 8,516 LSRs, 7,268 were fully
14 mechanized with 100% meeting the 3-hour benchmark. In February 2002,
15 BellSouth returned FOCs for 7,989 Resale LSRs and met the relevant
16 benchmark on 99% of all FOCs. Of the 7,989 LSRs, 6,868 were fully
17 mechanized with 99.9% meeting the 3-hour benchmark. See Attachment 11,
18 Sections A.1.9 through A.1.13 for further details.

19

20 **Reject Interval**

21 In December 2001, 1,167 LSRs were rejected, with 96% returned within the
22 relevant benchmark period. Of the LSRs rejected in December, 56% were

1 submitted electronically with 96% returned within the 1-hour benchmark. In
2 January 2002, 1,227 LSRs were rejected, with 96% returned within the
3 relevant benchmark period. Of the LSRs rejected in January, 56% were
4 submitted electronically with 97% returned within the 1-hour benchmark. In
5 February 2002, 1,192 LSRs were rejected, with 95% returned within the
6 relevant benchmark period. Of the LSRs rejected in February, 54% were
7 submitted electronically with 95% returned within the 1-hour benchmark. See
8 Attachment 11, Items A.1.4 through A.1.8 for further details.

9

10 The Resale Ordering sub-metrics for which BellSouth did not meet the
11 benchmarks/analogues for December 2001, January 2002 and/or February
12 2002 were:

13

14 Reject Interval / Residence / Electronic (A.1.4.1) (December/February)

15 Reject Interval / Business / Electronic (A.1.4.2) (December/February)

16 The current benchmark for electronic rejects is $\geq 97\%$ within one hour.
17 BellSouth's root cause analysis determined that a number of LSRs that did
18 not meet the one-hour benchmark were submitted when back-end legacy
19 systems were out of service and were unable to process the LSRs. Because
20 such LSRs should be excluded from the measurement, BellSouth
21 implemented a coding change in PMAP to ensure that scheduled OSS
22 downtime was properly excluded. This change was made with September

1 2001 data and was expected to improve sub-metric results for Reject Interval
2 performance.

3

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

14

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

1 solution. BellSouth met the benchmark for both of these sub-metrics in
2 January 2002.

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 January and February 2002.

9

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

11 There was only one LSR associated with this sub-metric in December 2001
12 and one LSR in February 2002. The small universe of orders for this sub-
13 metric does not provide a conclusive benchmark comparison. BellSouth met
14 the benchmark for this sub-metric in January 2002.

15

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

17 There were only 5 orders associated with this sub-metric in December 2001.
18 Such a small universe does not provide a conclusive benchmark comparison.
19 BellSouth met the benchmark comparison for this sub-metric in January and
20 February 2002.

21

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

2 (December/January)

3 BellSouth met the benchmark standard for this sub-metric 75 of the 82
4 responses in December 2001 and 109 of the 117 responses in January 2002.

5 The 95% benchmark required that 78 of the 82 responses December and 111
6 of the 117 responses for January meet the criteria. BellSouth met the
7 benchmark for this sub-metric in February 2002.

8

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

10 (December/January)

11 BellSouth met the benchmark standard for 87 of the 107 responses for this
12 sub-metric in December 2001 and for 126 of the 145 responses returned in
13 January 2002. The 95% benchmark required that 102 of the 107 responses
14 for December and 138 of the 145 responses for January meet the criteria.

15 BellSouth met the benchmark for this sub-metric in February 2002.

16

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

18 (A.1.16.3) (February)

19 BellSouth met the benchmark standard for 26 of the 32 responses for this
20 sub-metric in February 2002. The 95% benchmark required that 31 of the
21 32 responses meet the criteria. BellSouth met the benchmark for this sub-
22 metric in December 2001 and January 2002.

1

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

3 (December/February)

4 There were only four orders for this sub-metric in December 2001 and five
5 orders in February 2002. The small universe of orders for this sub-metric
6 does not provide a conclusive benchmark comparison. BellSouth met the
7 benchmark for this sub-metric in January 2002.

8

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

10 (December)

11 BellSouth met the benchmark standard for 6 of the 7 responses for this sub-
12 metric in December 2001 and for 12 of the 13 responses returned in January
13 2002. With universe sizes of only 7 and 13 orders and a 95% benchmark, a
14 problem with only one order causes a miss for the entire sub-metric.
15 BellSouth continues to focus on this measurement in order to improve results
16 to meet the benchmark. BellSouth met the benchmark for this sub-metric in
17 February 2002.

18

19 **2. Resale Provisioning Measures**

20

21 BellSouth met or exceeded the benchmark or retail analogue for 92% of all
22 Resale provisioning measures in December 2001, 87% in January 2002 and

1 82% in February 2002. The details supporting the February percentage are
2 delineated in Items A.2.1.1.1.1 through A.2.25.3.2.2 of Attachment 11.

3

4 Resale provisioning sub-metrics for which BellSouth did not meet the
5 benchmark/retail analogue in December 2001, January 2002 and/or February
6 2002 were:

7

8 Held Orders / Business / >= 10 Circuits / Facility (A.2.2.2.1) (February)

9 There was only one order for this sub-metric in February 2002. 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 December 2001 or January 2002.

13

14 Held Orders / ISDN / < 10 Circuits / Other (A.2.2.6.1.3) (February)

15 There was only one order for this sub-metric in February 2002. The small
16 universe of orders for this sub-metric does not provide a statistically
17 conclusive comparison to the retail analogue. BellSouth met the retail
18 analogue comparison for this sub-metric in December 2001 and January
19 2002.

20

21 % Jeopardies / Residence / Electronic (A.2.4.1) (January/February)

1 BellSouth completed as scheduled over 99% of the installation appointments
2 for this sub-metric in January. There were no systemic installation issues
3 identified for the 16 orders placed in jeopardy status in January or for the 37
4 orders placed in jeopardy status in February 2002. Only two of the jeopardies
5 in each month in this sub-metric resulted in held orders. BellSouth met the
6 retail analogue comparison for this sub-metric in December 2001.

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

10 For the period December 2001 through February 2002, less than 5% of the
11 orders completed for this sub-metric in the prior 30 days had trouble reports in
12 the following month. In December, 41 of the 182 trouble reports (23%) were
13 closed as "TOK/FOK." In January, 48 of the 187 trouble reports (26%) were
14 closed as "TOK/FOK." In February, 60 of the 239 trouble reports (25%) were
15 closed as "TOK/FOK." With a reduction in the number of reports that end up
16 as "no trouble found" incidents, the results for CLEC orders would be virtually
17 the same as the results for the BellSouth retail analogue. Analysis of the
18 troubles found for this sub-metric revealed that a majority was related to cable
19 and drop facilities distributed throughout the state with no distinct pattern or
20 trend.

21

1 % Provisioning Troubles within 30 Days / Business / < 10 Circuits / Dispatch

2 (A.2.12.2.1.1) (December/January/February)

3 In December 2001, there were 6 troubles reported for the 49 orders
4 completed in the prior 30 days. In January 2002, there were 5 troubles
5 reported for the 48 orders completed in the prior 30 days. There were 3
6 troubles reported for the 43 orders completed in the 30 days prior to February
7 2002. There was no systemic pattern to the troubles reported in either
8 December 2001, January or February 2002.

9

10 % Provisioning Troubles within 30 Days / Business / < 10 Circuits / Non-

11 Dispatch (A.2.12.2.1.2) (February)

12 There were 18 troubles reported In February 2002 for this sub-metric for the
13 225 orders completed within the prior 30 days. Of the 18 total trouble reports,
14 7 of the trouble reports were due to a single cut cable. There were no
15 patterns or systemic provisioning issues identified for the remainder of the
16 troubles. BellSouth met the retail analogue comparison for this sub-metric in
17 December 2001 and January 2002.

18

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

20 (January)

21 There were 74 orders reviewed for this sub-metric in January 2002.
22 BellSouth met the standard criteria for 64 of the 74 orders reviewed. Had

1 three additional orders been found to be accurate (70), BellSouth would have
2 met the 95% benchmark for this sub-metric in January 2002. BellSouth met
3 the benchmark for this sub-metric in December 2001 and February 2002.

4

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

7 There were only 11 orders reviewed for this sub-metric in January 2002.
8 BellSouth met the standard criteria for 10 of the 11 orders reviewed. With a
9 95% benchmark and a universe size of only 11 orders, problems with even
10 one order causes a miss for the entire sub-metric. BellSouth met the
11 benchmark for this sub-metric in December 2001 and February 2002.

12

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

15 BellSouth met the standard for 109 of the 125 orders reviewed in this sub-
16 metric for January and for 146 of the 155 orders reviewed in February 2002.
17 The 95% benchmark set requirements of 119 of the 125 orders for January
18 and 148 of the 155 orders for February, based on the quantity of orders for
19 this sub-metric. BellSouth continues to focus on this measurement in order to
20 improve results to meet the benchmark. BellSouth met or exceeded the
21 benchmark for this sub-metric in December 2001.

22

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

2 (A.2.25.2.1.2) (January)

3 BellSouth met the standard for 69 of the 74 orders reviewed in this sub-metric
4 for January 2002. The 95% benchmark set a requirement of 70 of the 74
5 orders, based on the quantity of orders for this sub-metric. BellSouth met or
6 exceeded the benchmark for this sub-metric in December 2001 and February
7 2002.

8

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

10 (December/January)

11 BellSouth met the standard for 14 of the 17 orders reviewed in this sub-metric
12 for December 2001 and for 11 of the 12 orders reviewed in January 2002.
13 The 95% benchmark set requirements of all 17 of the 17 orders in December
14 and all 12 of the 12 orders in January 2002, based on the quantity of orders
15 for this sub-metric. BellSouth met the benchmark for this sub-metric in
16 February 2002.

17

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

19 (A.2.25.2.2.2) (December/January/February)

20 BellSouth met the standard for 22 of the 28 orders reviewed in this sub-metric
21 for December 2001, for 17 of the 20 orders reviewed in January 2002 and for
22 15 of the 16 orders reviewed in February 2002. The 95% benchmark set

1 requirements of 27 of the 28 orders for December, 19 of the 20 orders for
2 January and all 16 of the 16 orders for February 2002, based on the quantity
3 of orders for this sub-metric. BellSouth continues to focus on this
4 measurement in order to improve results to meet the benchmark.

5

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

7 (A.2.25.3.1.1) (December/February)

8 BellSouth met the standard for 56 of the 63 orders reviewed in this sub-metric
9 for December 2001 and for 54 of the 60 orders reviewed in February 2002.

10 The 95% benchmark set requirements of 60 of the 63 orders for December
11 and for 57 of the 60 orders for February, based on the quantity of orders for
12 this sub-metric. BellSouth continues to focus on this measurement in order to
13 improve results to meet the benchmark. BellSouth met the benchmark for
14 this sub-metric in January 2002.

15

16 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Non-Dispatch

17 (A.2.25.3.2.2) (January/February)

18 BellSouth met the standard for 7 of the 10 orders reviewed for this sub-metric
19 in January and for 14 of the 17 orders reviewed in February 2002. The 95%
20 benchmark set requirements of all 10 orders for January and all 17 orders for
21 February, based on the quantity of orders for this sub-metric. With a 95%
22 benchmark and universe sizes of only 10 or 17 orders, problems with even

1 one order causes a miss for the entire sub-metric. BellSouth continues to
2 focus on this measurement in order to improve results to meet the
3 benchmark. BellSouth met the benchmark for this sub-metric in December
4 2001.

5

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

7

8 BellSouth met the relevant retail analogue comparisons for 92% of all the
9 Resale Maintenance & Repair measurements in December 2001, 89% in
10 January 2002 and 87% in February 2002. The sub-metrics for which
11 BellSouth did not meet the retail analogues in December 2001, January
12 and/or February 2002 were:

13

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

15 (January/February)

16 In both January and February 2002, the CLECs had over 97% trouble free
17 service for lines in this sub-metric, and the difference between the CLEC
18 trouble report rate and the retail analogue was less than 1%. No patterns or
19 systemic maintenance issues were identified for the troubles in this sub-
20 metric. BellSouth met the retail analogue comparison for this sub-metric in
21 December 2001.

22

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

2 In January the CLECs had over 98% trouble free service for this sub-metric
3 and although BellSouth missed the standard, the difference between the
4 trouble report rate for the CLECs and the retail analogue was only 0.3%.
5 BellSouth met the standard for this sub-metric in both December 2001 and
6 February 2002.

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 January and February 2002.

16

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

18 (December/February)

19 There were only 3 trouble reports for the 546 lines in service for this sub-
20 metric in December 2001 and 6 trouble reports for the 664 lines in service in
21 February 2002. BellSouth provided over 99% trouble free service for the in-
22 service lines in this sub-metric for both CLECs and BellSouth retail customers

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

13
14 Customer Trouble Report Rate / Centrex / Dispatch (A.3.2.5.1)
15 (January/February)

16 There were 26 trouble reports for this sub-metric in January 2002 for the 555
17 lines in service and only 6 trouble reports in February 2002 for the 460 lines in
18 service. BellSouth provided 95% trouble free service for both retail and the
19 CLECs for this sub-metric for January and over 98% trouble free service in
20 February. In February, 3 of the 6 trouble reports (50%) were closed as “no
21 trouble found.” From a practical point of view, the CLECs' ability to compete
22 has not been hindered even though the statistical results may technically

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

3

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

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

12

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

14 There were only 2 trouble reports for the 596 lines in service for this sub-
15 metric in January 2002. BellSouth provided over 99% trouble free service for
16 both retail and the CLECs for this sub-metric in January. From a practical
17 point of view, the CLECs' ability to compete has not been hindered even
18 though the statistical results may technically show that BellSouth failed to
19 meet the retail analogue. BellSouth met the retail analogue comparison for
20 this sub-metric in December 2001 and February 2002.

21

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

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

8

9 Maintenance Average Duration / Business / Dispatch (A.3.3.5.1) (February)

10 There were only six trouble reports for this sub-metric in February 2002. The
11 small universe of orders for the 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 December 2001 and January
14 2002.

15

16 % Repeat Troubles within 30 days / PBX / Non-Dispatch (A.3.4.4.2)

17 (December/February)

18 There was only one trouble report for this sub-metric in December 2001 and
19 one trouble report for February 2002. The small universe for this
20 measurement does not provide a statistically conclusive comparison with the
21 retail analogue. BellSouth met the retail analogue for this sub-metric in
22 January 2002.

1

2 % Repeat Troubles within 30 days / Centrex / Dispatch (A.3.4.5.1) (February)

3 There were only six trouble reports for this sub-metric in February 2002. The
4 small universe for this measurement does not provide a statistically
5 conclusive comparison with the retail analogue. BellSouth met the retail
6 analogue comparison for this sub-metric in December 2001 and January
7 2002.

8

9 % Repeat Troubles within 30 days / Centrex / Non-Dispatch (A.3.4.5.2)

10 (December)

11 There was only one trouble report for this sub-metric in February 2002. The
12 small universe for this measurement does not provide a statistically
13 conclusive comparison with the retail analogue. BellSouth met the retail
14 analogue comparison for this sub-metric in December 2001 and January
15 2002.

16

17 % Repeat Troubles within 30 days / ISDN / Non-Dispatch (A.3.4.6.2)

18 (December)

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

1

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

3 There were only two repair orders associated with this sub-metric in February
4 2002. Such a small universe of orders for this sub-metric does not provide a
5 statistically conclusive comparison to the retail analogue. BellSouth met the
6 retail analogue comparison for this sub-metric in December 2001 and January
7 2002.

8

9 Resale – Billing

10

11 Invoice Accuracy (A.4.1) (January)

12 The CLECs experienced Resale invoice accuracy rates that were less than
13 the rates for the invoices BellSouth sent to its retail customers during January
14 2002 (99.42% accuracy for BellSouth versus 98.12% for the CLEC invoices).
15 The difference in performance was the result of Other Charges and Credits
16 (OC&Cs) that were issued in January to recover E911 billing for November
17 2001. BellSouth failed to bill E911 for November 2001 because of computer
18 program errors. As a preventative action plan, BellSouth will improve the
19 process it uses to test program changes. BellSouth met the standard for this
20 sub-metric in December 2001 and February 2002.

21

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

1 The CLECs experienced Resale invoice delivery rates that were slightly
2 higher than the rates for BellSouth's retail customers during December 2001
3 (3.67 days for BellSouth versus 3.84 days for CLECS). The small difference
4 in performance was the result of recent shifts in workloads within the
5 BellSouth Bill Distribution department. BellSouth met the standard for this
6 sub-metric in January and February 2002.

7

8

III. Summary

9

10 As stated in the Introduction to the Analysis of Performance Measurements
11 section, BellSouth met or exceeded the benchmarks/retail analogues for 550
12 of the 604 sub-metrics (91%) for which there was CLEC activity in February
13 2001. In January 2002, 562 of 627 sub-metrics (90%) met or exceeded the
14 benchmarks or retail analogues. BellSouth met or exceeded the criteria for
15 545 of the 616 sub-metrics (88%) for which there was CLEC activity in
16 December 2001.

17

18 During the three-month period, December 2001 through February 2002,
19 excluding the measures discussed in the Introduction, there were a total of
20 541 sub-metrics that had CLEC activity for all three months and that were
21 compared with either benchmarks or retail analogues. Of these 541 sub-

1 metrics, 497 sub-metrics (92%) satisfied the comparison criteria during at
2 least two of the three months.
3