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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 March 2002. The performance data for Kentucky is

7   provided in Attachment 1J. In addition, Attachments 2 and 3 to Exhibit AJV-6,

8   filed originally on July 10, 2001, have been updated for March 2002 data and

9   are attached to this supplemental exhibit as Attachments 2J and 3J.

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 1J is the Monthly State Summary (MSS) for Kentucky for March

18   2001.   The March MSS contains 2,327 sub-metrics.   In March 2002,

19   BellSouth met or exceeded the comparison criteria for 560 of the 622 sub-

20   metrics, or 90%, 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 Average Jeopardy Notice Interval and FOC and Reject Completeness

8   measures. A variation on the FOC & Reject Response Completeness (O-11)

9   measurement, FOC/Reject Completeness (Multiple Responses), indicates the

10   proportion of times that multiple FOCs/Rejects for an LSR are returned. The

11   Georgia PSC did not order this measure to be implemented. Also, this

12   measurement can be misleading because sometimes multiple responses are

13   required for efficient operation of the business, such as when a second FOC

14   is returned to notify a CLEC when a jeopardy was cleared. Consequently,

15   while BellSouth reports data on this measure in the Monthly State Summary,

16   BellSouth has not included it in the calculation of performance measurements

17   that had CLEC activity. The LNP Disconnect Timeliness measure is still

18   under review by the Georgia PSC. These measures are included in the MSS

19   and in the total number of measurements calculation (2,327), but are

20   excluded from the "Met/Total" (560/622) percentage calculations.

21

1   During the three-month period, January through March 2002, again adjusting

2   for the measures mentioned above where appropriate, there were a total of

3   549 sub-metrics that had CLEC activity for all three months and that were

4   compared with either benchmarks or retail analogues. Of these 549 sub-

5   metrics, 509 sub-metrics (93%) satisfied the comparison criteria in at least

6   two of the three months.

7

8   Each sub-metric designated as having not satisfied the benchmark or

9   BellSouth retail analogue requirement for January, February and/or March

10 2002 is included in this Exhibit. Each sub-metric discussed is labeled as to

11 what month(s) the missed criteria occurred (January/February/March).

12

13 The following paragraphs will address specific performance measurements

14 associated with each checklist item.

15

16   **B. <u>CHECKLIST ITEM 1 – INTERCONNECTION</u>**

17

18 **<u>1. Collocation</u>**

19 BellSouth provides three separate collocation reports: 1) Average Response

20 Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.

21 Section E in Attachment 1J, 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 January, February and March 2002.

3

4   **2. Local Interconnection Trunking**

5   Trunking Reports

6   Attachment 1J, Section C, Items C.1.1 to C.4.2 of the March MSS contains

7   data for ordering, provisioning, maintenance and repair, and billing associated

8   with Local Interconnection Trunks.

9

10   In January, February and March 2002, BellSouth met the benchmarks/retail

11   analogue comparisons for 22 of the 24, 24 of the 24 and 24 of the 25,

12   respectively, local interconnection trunking sub-metrics having CLEC activity.

13   The sub-metrics that did not meet the retail analogue comparison in January,

14   February and/or March 2002 are as follows:

15

16   Customer Trouble Report Rate / Local Interconnection Trunks / Non-Dispatch

17   (C.3.2.2) (March)

18   There were only 25 trouble reports for the 14,430 lines in service for this sub-

19   metric in March 2002, representing a trouble free service rate of over 99.8%.

20   When BellSouth provisions high quality service coupled with very large

21   universe sizes, it can cause an apparent out of equity condition from a

22   quantitative viewpoint.   In these cases, there is very little variation and the

1   universe size is so large that the Z-test becomes overly sensitive to any

2   difference. In other words, the statistical test shows that the measurement

3   does not meet the fixed critical value when compared with the retail analogue,

4   but BellSouth's actual performance for both CLECs and its own retail

5   operations is at a very high level – in this case over 99%. From a practical

6   point of view, the CLECs' ability to compete has not been hindered even

7   though the statistical results may technically show that BellSouth failed to

8   meet the benchmark/analogue. BellSouth met the benchmark for this sub-

9   metric in January and February 2002.

10

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

12   (C.3.3.2) (January)

13   There were only three trouble reports for this sub-metric in January 2002.

14   The small universe of orders does not provide a statistically conclusive

15   comparison to the retail analogue. BellSouth met or exceeded the retail

16   analogue comparison for this sub-metric in February and March 2002.

17

18   % Repeat Troubles within 30 Days / Local Interconnection Trunks / Non-

19   Dispatch (C.3.4.2) (January)

20   There were only three trouble reports for this sub-metric in January 2002.

21   The small universe of orders does not provide a statistically conclusive

1   comparison to the retail analogue.   BellSouth met or exceeded the retail

2   analogue comparison for this sub-metric in February and March 2002.

3

4   Trunk Blockage

5   BellSouth has developed a trunk blocking report that compares BellSouth

6   retail's trunk blockage rates to those of CLECs.   The report, Trunk Group

7   Performance Report (TGP), Attachment 3J, displays trunk blocking in a

8   manner that accurately represents the customer experience. The TGP report

9   tabulates actual call blocking as a percentage of call attempts for all

10   comparable trunk groups administered by BellSouth that handle CLEC and

11   BellSouth traffic.   The TGP report provides a direct comparison of hour-by-

12   hour blocking between CLEC and BellSouth trunk groups.   Attachment 3J,

13   Item C.5.1 (TGP), shows the actual trunk blocking percentages by hour for

14   March 2002.   The Analogue/Benchmark for the Trunk Group Performance

15   measure is any consecutive two-hour period in 24 hours where CLEC

16   blockage exceeds BellSouth blockage by more than 0.5%.   BellSouth met or

17   exceeded the retail analogue for this sub-metric in January, February and

18   March 2002.

19

20   **C. <u>CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)</u>**

21

1   This section addresses the measures associated with UNEs under checklist

2   item 2. Attachment 1J, Sections B1 – B3, provides data that is divided into

3   Ordering, Provisioning and Maintenance & Repair operations. The Ordering

4   function is disaggregated into 17 sub-metrics. The Provisioning function has

5   19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair

6   function.   All Ordering measures will be included in this checklist item

7   because of the overall relationship of the mechanized, partially mechanized

8   and manual processing of Local Service Requests (LSRs). The Provisioning

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

10   in the checklist item as shown below:

11   Product   Checklist Item:

12   Combo (Loop & Port)   #2 – Unbundled Network Elements

13   Combo (Other)   #2 – Unbundled Network Elements

14   Other Design   #2 – Unbundled Network Elements

15   Other Non-Design   #2 – Unbundled Network Elements

16   xDSL Loop   #4 – Unbundled Local Loops

17   UNE ISDN Loop   #4 – Unbundled Local Loops

18   Line Sharing   #4 – Unbundled Local Loops

19   2w Analog Loop Design   #4 – Unbundled Local Loops

20   2w Analog Loop Non Design   #4 – Unbundled Local Loops

21   2w Analog Loop w/INP Design   #4 – Unbundled Local Loops

22   2w Analog Loop w/INP Non Design   #4 – Unbundled Local Loops

1	2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
2	2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops
3	Digital Loop < DS1	#4 – Unbundled Local Loops
4	Digital Loop => DS1	#4 – Unbundled Local Loops
5	Local Interoffice Transport	#5 – Unbundled Local Transport
6	Switch Ports	#6 – Unbundled Local Switching
7	INP Standalone	#11 – Local Number Portability
8	LNP Standalone	#11 – Local Number Portability

9

10 An overall review of the UNE sub-metrics for Ordering, Provisioning,

11 Maintenance & Repair and Billing indicates that BellSouth met the

12 benchmark/analogue for 93% of the sub-metrics during March 2002, 94% of

13 the sub-metrics in February 2002 and 94% of the sub-metrics in January

14 2002.

15

16 During the three-month period from January through March 2002, there were

17 275 UNE sub-metrics that had data for all three months and were compared

18 to benchmarks or retail analogues. Of those 275 sub-metrics, 264 (96%) sub-

19 metrics met the relevant criteria in at least two of the three months.

20

21 **1. UNE Ordering Measures**

22

1   Items B.1.1 – B.1.19 in Attachment 1J show data for Percent Rejected

2   Service Requests, Reject Interval, FOC Timeliness and FOC & Reject

3   Response Completeness. These reports are disaggregated by interface type

4   (electronic, partial electronic and manual), as well as product type.

5

6   **<u>Reject Interval</u>**

7   Items B.1.4 - B.1.8 in Attachment 1J examine the Reject Interval for the

8   month of March 2002. For orders submitted electronically, the benchmark is

9   97% within one hour. In January and February 2002, 97% and 94%,

10   respectively, of the rejected service requests were delivered within the one-

11   hour time period. In March 2002, 93% of rejected UNE electronic LSRs were

12   returned within the one-hour benchmark.

13

14   For partially mechanized orders, the benchmark is 85% within 10 hours.

15   BellSouth exceeded the benchmark in January, February and March 2002

16   with 96%, 96% and 97%, respectively, of rejects for partially mechanized

17   LSRs returned within the benchmark period.

18

19   For manual orders, the current benchmark is 85% within 24 hours. BellSouth

20   also exceeded this requirement in each of the three months, with 98% of the

21   LSRs submitted manually being returned to the CLECs within the 24-hour

22   time period in January and March 2002. BellSouth returned 100% of the

1   rejects for manually submitted LSRs within the 24-hour interval in February

2   2002.

3

4   The following sub-metrics did not meet the established benchmarks in

5   January, February and/or March 2002:

6

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

8   <u>(January/February/March)</u>

9   The current benchmark for electronic rejects is >= 97% within one hour.

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

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

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

13   such LSRs should be excluded from the measurement, BellSouth

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

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

16   2001 data and was expected to improve sub-metric results for Reject Interval

17   performance.

18

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

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

21   Central Time. As a result of this discrepancy, an hour is being added during

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

1   reflect the reject Interval duration. A change to address this issue for EDI was

2   implemented effective with February 2002 data, and BellSouth is in the

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

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

5   been properly implemented, BellSouth's Reject Interval performance would

6   generally have met the Commission's benchmark.

7

8   BellSouth's root cause analysis also identified an additional issue that impacts

9   the electronic Reject Interval sub-metrics. This issue arises when a fully

10   mechanized Firm Order Confirmation ("FOC") is followed by a manual

11   Clarification, a scenario that occurs when the Local Carrier Service Center

12   ("LCSC") must resolve specific types of errors after the issuance of the FOC.

13   This issue distorts the timeliness of BellSouth's electronic reject notices, and

14   BellSouth is currently analyzing this situation to determine an appropriate

15   solution.

16

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

18   There were only five orders for this sub-metric in January 2002. Such a small

19   universe of orders for the month for this sub-metric does not provide a

20   conclusive benchmark comparison. BellSouth met the benchmark for this

21   sub-metric in February and March 2002.

22

1   <u>Reject Interval / Line Sharing / Electronic (B.1.4.7) (January/February/March)</u>

2   There were only seven orders for this sub-metric in January, eight orders in

3   February and eleven orders in March 2002. Such a small universe of orders

4   per month for this sub-metric does not provide a conclusive benchmark

5   comparison.

6

7   <u>Reject Interval / 2w Analog Loop Design / Electronic (B.1.4.8)</u>

8   <u>(February/March)</u>

9   There were only six orders for this sub-metric in February and eight orders for

10   March 2002. The small universe of orders for this sub-metric does not

11   provide a conclusive benchmark comparison. BellSouth met the benchmark

12   for this sub-metric in January 2002.

13

14   <u>Reject Interval / 2w Analog Loop Non-Design / Electronic (B.1.4.9) (March)</u>

15   There were only three orders for this sub-metric in March 2002. The small

16   universe of orders for this sub-metric does not provide a conclusive

17   benchmark comparison. There was no CLEC activity for this sub-metric in

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

19   2002.

20

21   <u>Reject Interval / Other Design / Electronic (B.1.4.14)</u>

22   <u>(January/February/March)</u>

1   There were only nine rejected LSRs for this sub-metric in January 2002.

2   Such a small universe for this sub-metric does not provide a conclusive

3   benchmark comparison. In February and March 2002, BellSouth returned 13

4   of the 15 and 36 of the 38, respectively, rejected LSRs within the 1-hour

5   benchmark interval.   See Item B.1.4.3 for additional information on reject

6   intervals for electronically submitted LSRs.

7

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

9   In March 2002, BellSouth returned 173 of the 179 rejected LSRs (96.65%)

10   within the 1-hour benchmark interval.   See Item B.1.4.3 for additional

11   information on reject intervals for electronically submitted LSRs.

12

13   FOC Timeliness

14   For LSRs submitted electronically, the benchmark is 95% of the FOCs

15   returned within 3 hours. In January, February and March 2002, BellSouth

16   returned over 99% of FOCs for electronically submitted LSRs within the 3-

17   hour benchmark interval. For partially mechanized LSRs, the benchmark is

18   85% returned within 10 hours.   BellSouth met the 10-hour benchmark in

19   January, February and March 2002, with 97%, 93% and 97%, respectively, of

20   the FOCs returned for partially mechanized LSRs returned within the 10-hour

21   benchmark period.   For LSRs submitted manually, the benchmark is 85%

22   returned within 36 hours.   In January, February and March 2002, BellSouth

1   returned 99.7%, 100% and 99.6%, respectively, of the FOCs for manually

2   submitted UNE LSRs within the 36-hour window. The sub-metrics that did

3   not meet the benchmark in January, February and/or March 2002 are as

4   follows:

5

6   FOC Timeliness / xDSL / Electronic (B.1.9.5) (March)

7   BellSouth met the 3-hour benchmark interval for 25 of the 27 FOCs returned

8   for this sub-metric in January 2002. The 95% benchmark required that 26 of

9   the 27 FOCs be returned within the benchmark interval. BellSouth met the

10   benchmark for this sub-metric in January and February 2002.

11

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

13   In January 2002, BellSouth met the 10-hour benchmark interval for 57 of the

14   71 FOCs returned for this sub-metric. This was only three orders short of the

15   60 orders required to meet the 85% benchmark. BellSouth met the

16   benchmark for this sub-metric in February and March 2002.

17

18   FOC & Reject Response Completeness / UNE ISDN / EDI / Electronic

19   (B.1.14.6.1) (March)

20   There was only one order for this sub-metric in March 2002. The small

21   universe size for this sub-metric does not provide a conclusive benchmark

1   comparison. There was no CLEC activity for this sub-metric in either January

2   or February 2002.

3

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

5   / Electronic (B.1.14.9.2) (March)

6   There were only eleven orders for this sub-metric in March 2002. The small

7   universe size for this sub-metric does not provide a conclusive benchmark

8   comparison. BellSouth met the benchmark for this sub-metric in January and

9   February 2002.

10

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

12   Electronic (B.1.15.7.2) (January)

13   BellSouth met the standard criteria for 13 of the 14 responses for this sub-

14   metric in January 2002. With a 95% benchmark and a universe size of 14

15   orders, problems with even one response causes a miss for the entire sub-

16   metric. BellSouth met the benchmark for this sub-metric in February and

17   March 2002.

18

19   FOC & Reject Response Completeness / Combo (Loop & Port) / Manual

20   (B.1.16.3) (January)

21   BellSouth met the standard criteria for 131 of the 138 responses for this sub-

22   metric in January 2002 – only 1 response short of the 132 required to meet

1   the 95% benchmark.   BellSouth met the benchmark for this sub-metric in

2   February and March 2002.

3

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

5   (January)

6   BellSouth met the standard criteria for 18 of the 20 responses for this sub-

7   metric in January 2002 – only 1 response short of the 19 required to meet the

8   95% benchmark. BellSouth met the benchmark for this sub-metric in

9   February and March 2002.

10

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

12   (January)

13   BellSouth met the benchmark standard for 35 of the 37 responses for this

14   sub-metric in January 2002 – only 1 response short of the 36 required to meet

15   the 95% benchmark. BellSouth met the benchmark for this sub-metric in

16   February and March 2002.

17

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

19   Manual (B.1.16.9) (January/March)

20   BellSouth met the criteria for 18 of the 19 responses for this sub-metric

21   returned in January 2002 and for 10 of the 11 responses for February 2002.

22   The 95% benchmark required that all 19 of the January responses and all 11

1   of the March responses meet the criteria. BellSouth met the benchmark for

2   this sub-metric in February 2002.

3

4   <u>FOC & Reject Response Completeness / Other Design / Manual (B.1.16.14)</u>

5   <u>(January)</u>

6   BellSouth met the benchmark standard for 26 of the 28 responses for this

7   sub-metric in January 2002 – only 1 response short of the 27 required to meet

8   the 95% benchmark. BellSouth met the benchmark for this sub-metric in

9   February and March 2002.

10

11   <u>Flow-Through</u>

12   Attachment 1J, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated

13   by customer type and for the Summary/Aggregate. Detailed flow-through

14   results for individual CLECs are included in Attachment 2J. The following

15   table shows the Regional Flow-Through results for January, February and

16   March 2002 as compared with the Interim SQM benchmarks.

17

18   <u>% Flow-through Service Requests (F.1.1.1 – F.1.3.4)</u>

<u>Customer Type</u>	<u>January 2002</u>	<u>February 2002</u>	<u>March 2002</u>	<u>Benchmark</u>
Residence	88.56%	87.17%	86.49%	95%
Business	74.56%	75.20%	73.56%	90%

UNE	85.50%	84.86%	83.88%	85%
LNP	92.81%	94.12%	92.25%	85%

1

2   The table above excludes those LSRs designed to "fall out" for manual

3   handling.   The business flow-through rate is well below the 90% objective.

4   Business LSRs are more complex than the typical LSRs and, as a result,

5   there is a greater probability for error.   For example, an LSR requesting 10

6   lines with series completion hunting that are located over multiple floors and

7   have a variation of features on the lines presents many more opportunities for

8   system mismatches than one that adds just lines and features.

9

10   BellSouth has established a Flow-Through Improvement Program

11   Management process that includes seven different internal organizations.

12   Ongoing analysis is being done to determine trends and identify flow-through

13   problems.   To date, fifteen system enhancements have been identified and

14   are targeted for Encore releases.   Three of the enhancements were

15   implemented in August, five enhancements implemented in November and

16   two enhancements implemented in January 2002.   The remainder of the

17   enhancements are being released during 2002.

18

19   **2. UNE Provisioning Measures**

1   BellSouth met 94% of the overall UNE Provisioning measurements in

2   January, 92% in February and 94% in March 2002 for sub-metrics having

3   CLEC activity.   The following sub-metrics did not meet the applicable retail

4   analogues in the months of January, February and/or March 2002:

5

6   Order Completion Interval / Combo Other / < 10 Circuits / Dispatch

7   (B.2.1.4.1.1) (March)

8   When a CLEC requests an interval beyond the normal interval offered by

9   BellSouth, an "L" code should be entered on the service order. "L" coded

10   orders are excluded from the OCI metrics. There were only 13 orders shown

11   for this sub-metric in March 2002. All 13 of these orders were miscoded

12   omitting the "L-Code" designation which signifies an extended interval at the

13   customer's request.   BellSouth met the retail analogue comparison for this

14   sub-metric in January and February 2002.

15

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

17   (B.2.1.15.1.2) (January)

18   There was only one order for this sub-metric in January 2002. The small

19   universe of orders for this sub-metric does not provide a statistically

20   conclusive comparison to the retail analogue. There was no CLEC activity for

21   this sub-metric in March 2002. BellSouth met the retail analogue comparison

22   for this sub-metric in February 2002.

1

2   % Jeopardies / Combo Other / Electronic (B.2.5.4) (February)

3   There were only three 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. There was no CLEC activity for

6   this sub-metric in either January or March 2002.

7

8   % Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /

9   Non-Dispatch (B.2.18.3.1.2) (March)

10   BellSouth completed 1,917 of the 1,925 installation appointments as

11   scheduled in March 2002. Both BellSouth retail customers and the CLECs

12   had greater than 99.5% met appointment for the month. When BellSouth

13   provisions high quality service coupled with very large universe sizes, it can

14   cause an apparent out of equity condition from a quantitative viewpoint.   In

15   these cases, there is very little variation and the universe size is so large that

16   the Z-test becomes overly sensitive to any difference. In other words, the

17   statistical test shows that the measurement does not meet the fixed critical

18   value when compared with the retail analogue, but BellSouth's actual

19   performance for both CLECs and its own retail operations is at a very high

20   level – in this case over 99%. From a practical point of view, the CLECs'

21   ability to compete has not been hindered even though the statistical results

22   may technically show that BellSouth failed to meet the benchmark/analogue.

1   BellSouth met the benchmark for this sub-metric in January and February

2   2002.

3

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

5   Dispatch In (B.2.18.3.1.4) (January/March)

6   This measure is a further disaggregation of Item B.2.18.3.1.2.   BellSouth

7   completed 720 of the 723 installation appointments as scheduled in January

8   and 819 of the 827 appointments as scheduled in March 2002. Both

9   BellSouth retail customers and the CLECs had greater than 99% met

10   appointments for the month. When BellSouth provisions high quality service

11   coupled with very large universe sizes, it can cause an apparent out of equity

12   condition from a quantitative viewpoint.   In these cases, there is very little

13   variation and the universe size is so large that the Z-test becomes overly

14   sensitive to any difference. In other words, the statistical test shows that the

15   measurement does not meet the fixed critical value when compared with the

16   retail analogue, but BellSouth's actual performance for both CLECs and its

17   own retail operations is at a very high level – in this case over 99%. From a

18   practical point of view, the CLECs' ability to compete has not been hindered

19   even though the statistical results may technically show that BellSouth failed

20   to meet the benchmark/analogue. BellSouth met the benchmark for this sub-

21   metric in February 2002.

22

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

2   Dispatch (B.2.19.3.1.1) (February)

3   There were 10 total troubles reported for this sub-metric for the 89 orders

4   completed in the 30 days prior to February 2002. Five of the ten trouble

5   reports were closed as "no trouble found." Excluding these NTF reports, the

6   results for the CLECs would have been better than for the BellSouth retail

7   analogue for the month. BellSouth met the retail analogue comparison for

8   this sub-metric in January and March 2002.

9

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

11   Dispatch In (B.2.19.3.1.4) (February)

12   This measure is a further disaggregation of Item B.2.19.3.1.2 There were 29

13   total troubles reported for this sub-metric for the 723 orders completed in the

14   30 days prior to February 2002. Of the 29 trouble reports, 7 reports (24%)

15   were closed and "no trouble found." Excluding these NTF reports, the results

16   for the CLECs would have been very close to the results for the BellSouth

17   retail analogue. BellSouth met the retail analogue comparison for this sub-

18   metric in January and March 2002.

19

20   % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / >= 10 Circuits /

21   Dispatch (B.2.19.3.2.1) (March)

1   There were only two orders for this sub-metric in March 2002. The small

2   universe of orders for this sub-metric does not provide a statistically

3   conclusive comparison to the retail analogue. There was no CLEC activity for

4   this sub-metric in January 2002.   BellSouth met the retail analogue

5   comparison for this sub-metric in February 2002.

6

7   <u>% Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch</u>

8   <u>(B.2.19.4.1.1) (February)</u>

9   There were only nine orders 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. BellSouth met the retail

12   analogue comparison for this sub-metric in January and March 2002.

13

14   <u>% Provisioning Troubles w/i 30 Days / Combo Other / < 10 Circuits / Dispatch</u>

15   <u>In (B.2.19.4.1.4) (February)</u>

16   There were only nine orders for this sub-metric in February 2002. The small

17   universe of orders for this sub-metric does not provide a statistically

18   conclusive comparison to the retail analogue. There was no CLEC activity for

19   this sub-metric in either January or March 2002.

20

21   <u>Average Completion Notice Interval / Combo (Loop & Port) / >= 10 Circuits /</u>

22   <u>Dispatch (B.2.21.3.2.1) (March)</u>

1   There were only two completions for this sub-metric in March 2002. The

2   small universe of orders for this sub-metric does not provide a statistically

3   conclusive comparison to the retail analogue. There was no CLEC activity for

4   this sub-metric in February 2002. BellSouth met the retail analogue

5   comparison for this sub-metric in January 2002.

6

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

8   (B.2.34.1.2.1) (February)

9   BellSouth met the standard criteria for 27 of the 29 orders reviewed for this

10 sub-metric in February 2002. This was only one order short of the 28 orders

11 required by the 95% benchmark, based on the number of orders reviewed for

12 the sub-metric. BellSouth met the benchmark comparison for this sub-metric

13 in January and March 2002.

14

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

16 BellSouth met the applicable performance standards for 92% of UNE M&R

17 sub-metrics for January 2002, 97% for February 2002 and 94% for March

18 2002 of the overall UNE M&R measurements. The UNE M&R sub-metrics

19 that did not meet the fixed critical value for this checklist item are as follows:

20

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

22 (February)

1   There were only three orders for this sub-metric in February 2002. The small

2   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 March 2002.

5

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

7   (January)

8   There was only one trouble in January 2002 for 32 lines in service. 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 standard for

11   this sub-metric in February and March 2002.

12

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

14   (January)

15   There was only one trouble in January 2002 for 32 lines in service. 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 standard for

18   this sub-metric in February and March 2002.

19

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

21   (January/March)

1   There were 6 trouble reports for this sub-metric for the 115 lines in service in

2   January 2002 and 11 trouble reports for the 115 lines in service in March

3   2002. Both the CLECs and BellSouth retail received over 95% trouble free

4   service for this sub-metric in January and over 90% in March 2002. BellSouth

5   met the retail analogue comparison for this sub-metric in February 2002.

6

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

8   (B.3.2.11.2) (January/March)

9   There were 3 troubles reported for this sub-metric for the 115 lines in service

10   for this sub-metric in January 2002 and 7 troubles for the 115 lines in service

11   in March 2002. Three of the seven (43%0 March trouble reports were closed

12   as "no trouble found." In January and March, the CLECs received 97% and

13   94%, respectively, trouble free service for this sub-metric. BellSouth met the

14   retail analogue comparison for this sub-metric in February 2002.

15

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

17   (January)

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

19   The small universe for this sub-metric does not provide a statistically

20   conclusive comparison to the retail analogue. BellSouth met the retail

21   analogue comparison for this sub-metric in February and March 2002.

22

1   <u>Out of Service > 24 Hours / Other Non-Design / Dispatch (B.3.5.11.1)</u>

2   <u>(February)</u>

3   There was only one service-affecting trouble reported in February 2002. The

4   small universe for this sub-metric does not provide a statistically conclusive

5   comparison to the retail analogue.   BellSouth met the retail analogue

6   comparison for this sub-metric in January and March 2002.

7

8   **<u>UNE – Billing</u>**

9   <u>Mean Time to Deliver Invoices – CRIS / Region (B.4.2) (February/March)</u>

10   This metric measures the mean interval for timeliness of billing records

11   delivered to CLECs. The CLECs experienced UNE invoice delivery rates that

12   were higher than the rates for BellSouth's retail customers during both

13   February and March 2002 (3.64 days for BellSouth versus 6.13 for CLECs for

14   February and 3.68 days for BellSouth versus 7.51 for CLECs for March). The

15   difference in performance for both months was the result of bill period delays

16   encountered with BellSouth's billing system upgrade associated with UNE

17   CLEC bills and usage volumes. Processing cycles ran longer than expected.

18   BellSouth is currently working on enhancements that will decrease processing

19   time and speed the delivery of bills that will help to improve performance for

20   this metric. BellSouth met the retail analogue comparison for this sub-metric

21   in January 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   January, February and March 2002.

8

9   **Operations Support Systems**

10   The OSS/Preordering measures for which BellSouth did not meet the

11   benchmark/retail analogue in January, February and/or March 2002 were:

12

13   Average Response Interval / CRSECSRL / ROS / Region (D.1.3.5.2)

14   (February)

15   The CLECs received slightly longer response times from this system in

16   February 2002 than for the retail analogue standard (3.77 seconds average

17   for CLECS compared to 3.11 seconds for BellSouth). BellSouth met the retail

18   analogue comparison for this sub-metric in January and March 2002.

19

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

21   (January/February/March)

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   The average response interval for the CLEC requests did not meet the retail

5   analogue intervals for the less than 4-second disaggregation but exceeded

6   both the less than 10 and greater than 10 seconds responses. For the 4-

7   second interval, there was only approximately 1% difference between the

8   CLEC responses as compared with the retail analogue in all three months.

9   Both the CLECs and the retail analogue received approximately 99% or more

10   within the less than 10 second response interval. Similarly, for the greater

11   than 10 seconds interval measure, the CLECs and the BellSouth retail

12   analogue received approximately 1% or less of responses in over 10

13   seconds.   These very small differences in response intervals indicate

14   equivalent service levels for the CLECs and BellSouth retail.

15

16   Average Response Interval / DLR / Region (D.2.4.3) (January/February)

17   The average response intervals for these sub-metrics are measured in three

18   separate disaggregations -- the percentage of queries that are responded to

19   in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

20   BellSouth missed the standard for percentage of queries responded to in less

21   than 4 seconds during January, February and March 2002, but met the

22   standards for both the "less than 10 seconds" and "greater than ten seconds"

1   intervals.   Even though BellSouth technically missed the standard the

2   difference in performance for the CLECs versus BellSouth's retail analogue

3   was only 1.4% in January, 2.4% in February and 1.9% in March. There is no

4   evidence of disparate performance for this sub-metric.

5

6   <u>Average Response Interval / LMOSupd / Region (D.2.4.5, D.2.5.5, D.2.6.5)</u>

7   <u>(January/February/March)</u>

8   The average response interval for this sub-metric is measured in three

9   separate disaggregations -- the percentage of queries that are responded to

10   in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

11   For each of the three sub-metrics, there was less than a 9% difference in the

12   percentage of responses received by the CLECs and BellSouth retail in each

13   month, January through March 2002.   Differences of 10%, or less, for these

14   intervals indicate virtually equivalent service levels for both the CLECs and

15   BellSouth retail.

16

17   <u>Average Response Interval / LNP/ Region (D.2.4.6) (January/March)</u>

18   <u>Average Response Interval / LNP/ Region (D.2.5.6, D.2.6.6) (March)</u>

19   The average response interval for this measurement is measured in three

20   separate disaggregations -- the percentage of queries that are responded to

21   in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

22   In both January and March 2002, the average response interval for the CLEC

1   requests did not meet the retail analogue interval for the less than 4-second

2   disaggregation but exceeded the less than 10 and greater than 10 seconds

3   responses. In January 2002, both the CLECs and BellSouth retail received

4   over 98.8% of responses in less than 4 seconds and less than 0.3% in more

5   than 10 seconds. The less than one percent difference for these intervals

6   indicates virtually equivalent service levels for the CLECs and BellSouth

7   retail. In March the "less than 4 second" and "less than 10 second" measures

8   for both BellSouth retail and for CLECs was over 99%. The "greater than 10

9   second" measure for both BellSouth retail and for CLECs was less than 0.2%.

10   These performance results also indicate virtually equivalent service being

11   provided for the CLECs and BellSouth retail. BellSouth met the retail

12   analogue comparison for these sub-metrics in February 2002.

13

14   <u>Average Response Interval / OSPCM / Region (D.2.4.8) (January/March)</u>

15   The average response interval for these sub-metrics is measured in three

16   separate disaggregations -- the percentage of queries that are responded to

17   in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

18   In January 2002, the CLEC response interval for the "less than, or equal to 4

19   seconds" measure was 13.92% compared to 26.31% for the retail analogue.

20   In March the CLECs had 13.59% of responses in less than 4 seconds

21   compared to 23.94% for the retail analogue. BellSouth met the retail

1   analogue comparison for all three of the sub-metrics in this measure for

2   February 2002 and two out of three in both January and March 2002.

3

4   <u>Average Response Interval / NIW / Region (D.2.4.11) (January/March)</u>

5   The average response interval for this sub-metric is measured in three

6   separate disaggregations -- the percentage of queries that are responded to

7   in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

8   In both January and March 2002, the average response interval for the CLEC

9   requests did not meet the retail analogue intervals for the less than 4-second

10   disaggregation but exceeded both the less than 10 and greater than 10

11   seconds responses. The CLEC response interval was 85.67% within 4

12   seconds in January, as compared with 87.02% for the retail analogue, and

13   81.81% within 4 seconds in March, as compared to 82.97% for the retail

14   analogue. The small difference between the CLEC and retail analogue

15   results should not impede the CLECs' ability to compete in this area.

16   BellSouth met the retail analogue comparison for this sub-metric in February

17   2002.

18

19   **<u>General – Maintenance Center</u>**

20   <u>Average Answer Time / Region (F.5.1) (February)</u>

1   BellSouth missed the retail analogue comparison for this measure in February

2   2002 but met the retail analogue comparison for both January and March

3   2002.

4

5   **General – Billing**

6   Usage Data Delivery Accuracy (F.9.1) (February)

7   This measure compares the rate at which error-free usage data is sent to

8   CLECs with the same measure for the BellSouth retail analog. The CLECs

9   experienced usage data delivery accuracy rates that were slightly lower than

10   the rates for BellSouth customers during February 2002 (99.85% for

11   BellSouth versus 99.62% for CLECs). The difference in performance was the

12   result of a problem with ODUF pack sequence numbers. This problem did

13   not involve any missing or incorrect usage data from ODUF. The problem

14   only involved ODUF pack sequence numbers which normally go in sequence

15   from '01' to '99' for each customer. After a system problem occurred with the

16   output sequence table on February 19, 2002, the sequence numbers were

17   inadvertently restarted to '01' on all ODUFs for all CLECs.   The sequence

18   table was corrected, and the correct pack number for each customer was

19   restarted on February 22, 2002. All CLECs, who questioned BellSouth about

20   this problem, reported that they understood that no usage data was actually

21   missing or incorrect as a result of the problem, and none of the CLECs

1   requested that BellSouth retransmit any ODUF data. Bellsouth met the retail

2   analogue comparison for this sub-metric in January and March 2002.

3

4   Usage Data Delivery Timeliness (F.9.2) (March)

5   This measure tracks the percentage of usage data delivered within six

6   calendar days for both BellSouth retail and the CLEC aggregate. The CLECs

7   experienced usage data delivery timeliness rates that were slightly lower than

8   the rates for BellSouth customers during March 2002 (98.37% for BellSouth

9   compared to 93.11% for CLECs). The difference in performance for March

10   was the result of bill period delays encountered with BellSouth's billing system

11   upgrade associated with UNE CLEC bills and usage volumes. Processing

12   cycles ran longer than expected.   BellSouth is currently working on

13   enhancements that will decrease processing time and speed the delivery of

14   bills that will help to improve performance for this metric. BellSouth met the

15   retail analogue comparison for this sub-metric in January and February 2002.

16

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

18   This measure tracks the ability of the ordering and billing systems to begin

19   billing a CLEC recurring charges for UNE services on the next invoice after an

20   order has "completed". For UNE orders, the goal is to meet a benchmark of

21   90%. In February 2002, the result was 89.37%. The benchmark was not met

22   in February because several orders were backdated to the dates that zone

1   mileage Universal Service Order Codes (USOCs) were placed on the related

2   lines.   Zone mileage USOCs are not valid with the UNE Switched

3   Combination classes of service in which the accounts are categorized. These

4   mileage USOCs should have been removed when the accounts were

5   converted from either BellSouth retail or CLEC resale lines to UNE-P. As a

6   temporary corrective measure, BellSouth has zero-rated these mileage

7   USOCs on the rate file. As a permanent solution to this problem, BellSouth

8   plans to implement a LESOG (Local Exchange Service Order Generator)

9   program change in May 2002 that will mechanically remove mileage USOCs

10 when a line is converted from retail or resale to UNE-P. Bellsouth met the

11 retail analogue comparison for this sub-metric in January and March 2002.

12

13 <u>Recurring Charge Completeness / Interconnection (F.9.5.3) (January/March)</u>

14 This measure tacks the ability of the ordering and billing systems to begin

15 billing a CLEC recurring charges for local interconnection services on the next

16 invoice after an order has "completed". For local interconnection orders, the

17 goal is to meet a benchmark of 90%. In January and March 2002, the results

18 were 88.44% and 89.30%, respectively.   The benchmark was not met in

19 January due to problems encountered by BellSouth in correcting some

20 service order errors in a timely manner.

21

1   The main reason the benchmark was not met in March was because of

2   customer requested changes to the due date for one service order. This

3   order included a total of only $4.47 in recurring charges, $2.66 of which was

4   billed late. The original due date of the order was October 11, 2001. The

5   customer changed the due date three times, and the final requested due date

6   was March 6, 2002. BellSouth completed the order on March 6, 2002 and the

7   charges billed properly on the next invoice after the order completed.

8   However, since the customer chose not to cancel the order, per section 5.4.A

9   of the FCC tariff, 31st day billing was initiated. This type of billing requires that

10   when certain criteria are met, the effective bill date (EBD) of the order should

11   be 31 days after the original due date. Therefore, the billing for this order was

12   backdated to September 11, 2001. Whenever possible, BellSouth plans to

13   exclude 31st day billing and other backdating situations from metric results in

14   the future when it is discovered that BellSouth is not at fault. BellSouth

15   continues to monitor results and will adjust procedures as necessary to

16   further improve this metric. BellSouth met the benchmark for this sub-metric

17   in February 2002.

18

19   <u>Non-Recurring Charge Completeness – Resale (F.9.6.1) (January)</u>

20   This measure tracks the ability of the ordering and billing systems to begin

21   billing a CLEC non-recurring charges for resale services on the next invoice

22   after an order has "completed". For resale orders, the goal is to meet a

1   benchmark of 90%. In January 2002, the result was 70.10%. The

2   benchmark was not met in January because of back-billed OSS charges

3   applied to CLEC accounts. These OSS charges are due to BellSouth for

4   handling LSRs that were cancelled by CLEC customers. In the past,

5   BellSouth's systems have not been equipped to apply these cancellation

6   charges. During 2002, BellSouth plans to complete an initiative to bill these

7   OSS charges on a current basis for cancelled LSRs. BellSouth met the

8   standard for this sub-metric in February and March 2002.

9

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

11   This measure tracks the ability of the ordering and billing systems to begin

12   billing a CLEC non-recurring charges for UNE services on the next invoice

13   after an order has "completed". For UNE orders, the goal is to meet a

14   benchmark of 90%. In January 2002, the result was 74.93%. The

15   benchmark was not met in January because of back-billed OSS charges

16   applied to CLEC accounts. These OSS charges are due to BellSouth for

17   handling LSRs that were cancelled by CLEC customers. In the past,

18   BellSouth's systems have not been equipped to apply these cancellation

19   charges. During 2002, BellSouth plans to complete an initiative to bill these

20   OSS charges on a current basis for cancelled LSRs. BellSouth met the

21   standard for this sub-metric in February and March 2002.

22

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

2   This measure tracks the ability of the ordering and billing systems to begin

3   billing a CLEC non-recurring charges for local interconnection services on the

4   next invoice after an order has "completed". For local interconnection orders,

5   the goal is to meet a benchmark of 90%. In January 2002, the result was

6   47.50%. The benchmark was not met in January because of two main

7   reasons. The first reason is related to back-billed OSS charges applied to

8   CLEC accounts. These OSS charges are due to BellSouth for handling LSRs

9   that were cancelled by CLEC customers. In the past, BellSouth's systems

10   have not been equipped to apply these cancellation charges. During 2002,

11   BellSouth plans to complete an initiative to bill these OSS charges on a

12   current basis for cancelled LSRs.

13

14   The second reason is related to problems encountered in correcting service

15   order errors in a timely manner.   In an effort to prevent this problem from

16   occurring in the future, BellSouth has made revisions to error handling

17   procedures that will allow errors to be recognized, worked and resolved in a

18   timelier manner. BellSouth met the standard for this sub-metric in February

19   and March 2002.

20

21   **General - Change Management**

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

1   BellSouth met the benchmark for one of the two software releases in January

2   2002.   BellSouth met the benchmark for this sub-metric in February 2002.

3   There were no releases for this measure in March 2002.

4

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

6   There were only two Change Management Documentation notices issued in

7   February 2002.   Both documentation release notices missed the 30-day

8   advance window but both made the 22-day "delay days" cut-off window.   In

9   both January and March 2002, there were two Change Management

10   Documents, both of which were sent on time with no delay days.

11

12   **General – Ordering**

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

14   (January/February/March)

15   BellSouth failed to deliver 1 (0.00026%) of the 379,170 messages in January

16   2002 for this sub-metric, 2 (0.00059%) of the 341,453 messages in February

17   2002 and 6 (0.00179%) of the 334,739 messages in March 2002. Analysis

18   continues to identify any issues in this process.   However, such a small

19   number of failed records have not revealed any systemic process problems.

20

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

22

1   As discussed in Checklist Item 2, Sections B.2 and B.3 of Attachment 1J

2   provide data for Provisioning and Maintenance & Repair measures for

3   unbundled local loops.

4

5   For purposes of discussion in this checklist item, the local loop sub-metrics

6   have been separated into two mode-of-entry groups, xDSL and

7   SL1/SL2/Digital. The xDSL group includes xDSL (ADSL, HDSL, UCL), ISDN

8   and Line Sharing sub-metrics. The SL1/SL2/Digital group includes the design

9   and non-design 2-wire analog loops, as well as the 2-wire and 4-wire digital

10   loop sub-metrics.

11

12   **xDSL Group**

13

14   **1. Provisioning Measures**

15   The provisioning sub-metrics that did not meet the retail analogues in

16   January, February and/or March 2002 are as follows:

17

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

19   There were only thirteen orders for this sub-metric in January 2002. The

20   small universe of orders for this sub-metric does not provide a statistically

21   conclusive comparison to the retail analogue. BellSouth met the standard for

22   this sub-metric in February and March 2002.

1

2 % Provisioning Troubles within 30 Days / Line Sharing / < 10 Circuits / Non-

3 Dispatch (B.2.19.7.1.2) (February)

4 There were only ten orders for this sub-metric in February 2002. The small

5 universe of orders for this sub-metric does not provide a statistically

6 conclusive comparison to the retail analogue. BellSouth met the retail

7 analogue for this sub-metric in January and March 2002.

8

9 **2. Maintenance & Repair Measures**

10

11 Missed Repair Appointments / Line Sharing / Non-Dispatch (B.3.1.7.2)

12 (March)

13 There were only four orders for this sub-metric in March 2002. The small

14 universe of orders for the month does not provide a conclusive comparison to

15 the retail analogue. BellSouth met the retail analogue comparison for this

16 sub-metric in January and February 2002.

17

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

19 (January/March)

20 The CLEC aggregate reported 9 troubles for the 586 lines in service for this

21 sub-metric in January 2002 and 11 troubles for the 549 lines in service in

22 March 2002. Both the CLECs and BellSouth retail had 98% or more trouble

1   free service in both January and March 2002.   BellSouth met the retail

2   analogue comparison for this sub-metric in February 2002.

3

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

5   (January)

6   The CLEC aggregate reported 18 troubles for this sub-metric in January 2002

7   representing a 95% trouble free rate for CLECs.   BellSouth met the retail

8   analogue comparison for this sub-metric in February and March 2002.

9

10   Maintenance Average Duration / Line Sharing / Dispatch (B.3.3.7.2) (March)

11   There were only four orders for this sub-metric in March 2002.   The small

12   universe of orders for the month does not provide a statistically conclusive

13   comparison to the retail analogue.   BellSouth met the retail analogue for this

14   sub-metric in January and February 2002.

15

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

17

18   The provisioning and maintenance and repair sub-metrics that did not meet

19   the retail analogue for this group in January, February and/or March 2002

20   were:

21

22   **1. Provisioning Measures**

1

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

3   There were only thirteen orders for this sub-metric in January 2002. The

4   small universe size 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 February and March 2002.

7

8   <u>% Jeopardies / Digital Loop >= DS1 / Electronic (B.2.5.19)</u>

9   <u>(January/February/March)</u>

10   There were 19 orders for this sub-metric in January, 26 orders in February

11   and 16 orders in March 2002. Even though 6 of the 19 orders for January, 16

12   of the 26 orders for February and 9 of the 16 orders for March were shown in

13   jeopardy status, all of the jeopardies for facilities problems for each of the

14   three months were resolved prior to the due dates and these orders were

15   completed as scheduled.

16

17   <u>% Provisioning Troubles within 30 Days / 2w Analog Loop Non-Design / < 10</u>

18   <u>Circuits / Dispatch (B.2.19.9.1.1) (February)</u>

19   There were only four orders for this sub-metric in February 2002. The small

20   universe of orders does not provide a statistically conclusive comparison to

21   the retail analogue. BellSouth met the retail analogue comparison for this

22   sub-metric in January and March 2002.

1

2 <u>% Provisioning Troubles within 30 Days / Digital Loop >= DS1 / < 10 Circuits /</u>

3 <u>Dispatch (B.2.19.19.1.1) (February)</u>

4 There were only three troubles reported for the CLEC aggregate for this sub-

5 metric in February 2002.   There were no systemic provisioning issues

6 identified for any of the three trouble reports.   BellSouth met the retail

7 analogue comparison for this sub-metric in January and March 2002.

8

9 <u>Average Completion Notice Interval / 2W Analog Loop w/LNP Design/ < 10</u>

10 <u>Circuits / Dispatch (B.2.21.12.1.1) (January)</u>

11 There was only one order for this sub-metric in January 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 February or March 2002.

15

16 **2. Maintenance & Repair Measures**

17

18 <u>Customer Trouble Report Rate / 2W Analog Loop Non-Design / Dispatch</u>

19 <u>(B.3.2.9.1) (January)</u>

20 In January 2002 there were only 2 trouble reports on 19 lines.   The small

21 universe of trouble reports for this sub-metric does not provide a statistically

1   conclusive comparison to the retail analogue. BellSouth met the retail

2   analogue comparison for this sub-metric in February and March 2002.

3

4   ### E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT

5

6   The data in these measures indicate that BellSouth met the

7   benchmark/analogue requirements for all measurements in Checklist Item 5

8   for January, February and March 2002.

9

10

11 ### F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING

12

13 The data in these measures indicate that BellSouth met the

14 benchmark/analogue requirements for all measurements in Checklist Item 6

15 for January, February and March 2002.

16

17 ### G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES

18 ### H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR

19 ### SERVICES

20

21 As indicated in Attachment 1J, Sections F.6, F.7 and F.8, BellSouth met the

22 benchmark/analogue requirements of Checklist Items 7a and 7b in January,

23 February and March 2002. Even though BellSouth tracks and reports these

1   measures, the processes used in providing these services are designed to

2   provide parity for all users.

3

4   **I. CHECKLIST ITEM 10 – ACCESS TO DATABASES AND ASSOCIATED**

5   **SIGNALING**

6   BellSouth met the required benchmarks for all four of the four sub-metrics

7   associated with this checklist item in January and February 2002 and met

8   three of the four sub-metrics in March 2002. See items F.13.1.1 through

9   F.13.3 in Attachment 1J for further details. The sub-metric that did not meet

10   the benchmark for March 2002 was as follows:

11

12   % NXXs / LRNs Loaded by LERG Effective Date / Region (F.3.3) (March)

13   BellSouth met the effective date for loading 29 of the 30 NXXs implemented

14   during March 2002. This is regional measure. BellSouth met the LERG

15   effective dates for all NXXs loaded for Kentucky operations in March 2002.

16   BellSouth met the benchmark for this sub-metric in January and February

17   2002.

18

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

20

21   All the measurements in this Checklist Item were met or exceeded for

22   January, February and/or March 2002 except for the following:

1

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

3   (B.2.1.16.1.2) (January)

4   There was only one order for this sub-metric in January 2002. The small

5   universe of orders for this sub-metric does not provide a statistically

6   conclusive comparison to the retail analogue. There was no CLEC activity for

7   this sub-metric in either February or March 2002.

8

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

10   (B.2.1.17.2.2) (January)

11   There were only four orders for this sub-metric in January 2002. The small

12   universe of orders for this sub-metric does not provide a statistically

13   conclusive comparison to the retail analogue. BellSouth met the retail

14   analogue comparison for this sub-metric in March 2002. There was no CLEC

15   activity for this sub-metric in February 2002.

16

17   % Missed Installation Appointments / LNP (Standalone) / < 10 Circuits / Non-

18   Dispatch) (B.2.18.17.1.2)

19   BellSouth completed 1,249 of the 1,253 installations for this sub-metric on or

20   before their scheduled due dates in March 2002. This represents an over

21   99.6% successful completion rate. There were no systemic installation issues

1   identified for the four misses. BellSouth met the retail analogue comparison

2   for this sub-metric in January and February 2002.

3

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

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.

11

12 **K. CHECKLIST ITEM 14 – RESALE**

13

14 In January 2002, BellSouth met or exceeded the benchmarks/analogues for

15 87% of the resale sub-metrics having CLEC activity, and in February 2002,

16 BellSouth met or exceeded 85% of the resale sub-metrics. In March 2002,

17 BellSouth met or exceeded 88% of the Resale sub-metrics having CLEC

18 activity for the month. The details for the March 2002 data are delineated in

19 Attachment 1J, Items A.1.1.1.1 through A.4.2.

20

21 During the three-month period from January through March 2002, there were

22 135 Resale sub-metrics that had data for all three months and were

1   compared to benchmarks or retail analogues. Of those 135 sub-metrics, 119

2   (88%) sub-metrics met the relevant criteria in at least two of the three months.

3

4   **1. Resale Ordering Measures**

5   **FOC Timeliness**

6   In January 2002, BellSouth returned FOCs for 8,516 Resale LSRs and met

7   the relevant benchmark on 99% of them. Of the 8,516 LSRs, 7,268 were fully

8   mechanized with 100% meeting the 3-hour benchmark. In February 2002,

9   BellSouth returned FOCs for 7,989 Resale LSRs and met the relevant

10   benchmark on 99% of all FOCs.   Of the 7,989 LSRs, 6,868 were fully

11   mechanized with 99.9% meeting the 3-hour benchmark.   In March 2002,

12   BellSouth returned FOCs for 7,795 Resale LSRs and met the relevant

13   benchmark on 99% of them.   Of the 7,795 LSRs, 6,675 were fully

14   mechanized with 99.9% meeting the 3-hour benchmark. See Attachment 1J,

15   Sections A.1.9 through A.1.13 for further details.

16

17   **Reject Interval**

18   In January 2002, 1,227 LSRs were rejected, with 96% returned within the

19   relevant benchmark period.   Of the LSRs rejected in January, 56% were

20   submitted electronically with 97% returned within the 1-hour benchmark. In

21   February 2002, 1,192 LSRs were rejected, with 95% returned within the

22   relevant benchmark period. Of the LSRs rejected in February, 54% were

1   submitted electronically with 95% returned within the 1-hour benchmark. In

2   March 1,211 LSRs were rejected, with 93% returned within the relevant

3   benchmark period. Of the LSRs rejected in March, 55% were submitted

4   electronically with 93% returned within the 1-hour benchmark. See

5   Attachment 1J, Items A.1.4 through A.1.8 for further details.

6

7   The Resale Ordering sub-metrics for which BellSouth did not meet the

8   benchmarks/analogues for January, February and/or March 2002 were:

9

10   Reject Interval / Residence / Electronic (A.1.4.1) (February/March)

11   Reject Interval / Business / Electronic (A.1.4.2) (February/March)

12   The current benchmark for electronic rejects is >= 97% within one hour.

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

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

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

16   such LSRs should be excluded from the measurement, BellSouth

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

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

19   2001 data and was expected to improve sub-metric results for Reject Interval

20   performance.

21

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

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

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

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

5   reflect the reject Interval duration. A change to address this issue for EDI was

6   implemented with February 2002 data, and BellSouth is in the process of

7   scheduling a similar change for TAG.   BellSouth's root cause analysis has

8   determined that, had the scheduled OSS downtime exclusion been properly

9   implemented, BellSouth's Reject Interval performance would generally have

10   met the Commission's benchmark.

11

12   BellSouth's root cause analysis also identified an additional issue that impacts

13   the electronic Reject Interval sub-metrics.   This issue arises when a fully

14   mechanized Firm Order Confirmation ("FOC") is followed by a manual

15   Clarification, a scenario that occurs when the Local Carrier Service Center

16   ("LCSC") must resolve specific types of errors after the issuance of the FOC.

17   This issue distorts the timeliness of BellSouth's electronic reject notices, and

18   BellSouth is currently analyzing this situation to determine an appropriate

19   solution.   BellSouth met the benchmark for both of these sub-metrics in

20   January 2002.

21

22   <u>Reject Interval / PBX / Electronic (A.1.4.4) (March)</u>

1   There were only two LSRs rejected for this sub-metric in arch 2002. The

2   small universe of orders for the month does no provide a conclusive

3   benchmark comparison. There was no CLEC activity for this sub-metric in

4   either January or February 2002.

5

6   <u>FOC Timeliness / PBX) / Partial Electronic (A.1.12.4) (February)</u>

7   There was only one LSR associated with this sub-metric in February 2002.

8   The small universe of orders for this sub-metric does not provide a conclusive

9   benchmark comparison. BellSouth met the benchmark for this sub-metric in

10   January 2002. There was no CLEC activity for this sub-metric in March 2002.

11

12   <u>FOC & Reject Response Completeness / Residence / Manual (A.1.16.1)</u>

13   <u>(January/March)</u>

14   BellSouth met the benchmark standard for this sub-metric for 109 of the 117

15   responses in January and for 959 of the 103 responses in March 2002. The

16   95% benchmark required that 111 of the 117 responses for January and 98 of

17   the 1037 responses for March meet the criteria. BellSouth met the

18   benchmark for this sub-metric in February 2002.

19

20   <u>FOC & Reject Response Completeness / Business / Manual (A.1.16.2)</u>

21   <u>(January)</u>

1   BellSouth met the benchmark standard for 126 of the 145 responses for this

2   sub-metric in January 2002.   The 95% benchmark required that 138 of the

3   145 responses meet the criteria. BellSouth met the benchmark for this sub-

4   metric in February and March 2002.

5

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

7   (A.1.16.3) (February)

8   BellSouth met the benchmark standard for 26 of the 32 responses for this

9   sub-metric in February 2002.   The 95% benchmark required that 31 of the

10   32 responses meet the criteria. BellSouth met the benchmark for this sub-

11   metric in January and March 2002.

12

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

14   There were only five orders for this sub-metric in February 2002. The small

15   universe of orders for this sub-metric does not provide a conclusive

16   benchmark comparison. BellSouth met the benchmark for this sub-metric in

17   January and March 2002.

18

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

20   BellSouth met the benchmark standard for 12 of the 13 responses for this

21   sub-metric in January 2002. With a universe size of only 13 orders and a

22   95% benchmark, a problem with only one order causes a miss for the entire

1   sub-metric. BellSouth met the benchmark for this sub-metric in February and

2   March 2002.

3

4   **2. Resale Provisioning Measures**

5

6   BellSouth met or exceeded the benchmark or retail analogue for 87% of all

7   Resale provisioning measures in January, 82% in February and 82% in

8   March 2002. The details supporting the March percentage are delineated in

9   Items A.2.1.1.1.1 through A.2.25.3.2.2 of Attachment 1J.

10

11   Resale provisioning sub-metrics for which BellSouth did not meet the

12   benchmark/retail analogue in January, February and/or March 2002 were:

13

14   Held Orders / Business / >= 10 Circuits / Facility (A.2.2.2.2.1) (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. There was no CLEC activity for

18   this sub-metric in January 2002. BellSouth met the retail analogue

19   comparison for this sub-metric in March 2002.

20

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

1   There was only one order for this sub-metric in February 2002. The small

2   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 March 2002.

5

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

7   BellSouth completed as scheduled over 99% of the installation appointments

8   for orders associated with this sub-metric in January and March. There were

9   no systemic installation issues identified for the 16 orders placed in jeopardy

10   status in January, for the 37 orders placed in jeopardy status in February or

11   for the 35 orders placed in jeopardy status in March 2002. Only two of the

12   jeopardies for January and February and one of the jeopardy orders for

13   March in this sub-metric resulted in held orders.

14

15   % Missed Installation appointments / Business / < 10 Circuits / Dispatch

16   (A.2.11.2.1.1) (March)

17   BellSouth completed 51 of the 56 installations for this sub-metric as

18   scheduled in March 2002. There were no patters or systemic installation

19   issues identified for the five misses orders. BellSouth met the retail analogue

20   comparison for this sub-metric in January and February 2002.

21

1   % Missed Installation Appointments / Business / >= 10 Circuits / Dispatch

2   (A.2.11.2.2.1) (March)

3   There were only two orders for this sub-metric in March 2002. The small

4   universe of orders for the month does not provide a statistically conclusive

5   comparison to the retail analogue. There was no CLEC activity for this sub-

6   metric in either January or February 2002.

7

8   % Missed Installation Appointments / ISDN / < 10 Circuits / Non-Dispatch

9   (A.2.11.6.1.2) (March)

10   There were only five orders for this sub-metric in March 2002. The small

11   universe of orders for the month does not provide a statistically conclusive

12   comparison to the retail analogue. BellSouth met the retail analogue

13   comparison for this sub-metric in January and February 2002.

14

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

16   Dispatch (A.2.12.1.1.2) (January/February/March)

17   For January and February 2002, less than 5% of the orders completed for this

18   sub-metric in the prior 30 days had trouble reports in the following month. In

19   March 2002, less than 7% of the orders completed in the prior thirty days

20   resulted in trouble reports. In January, 48 of the 187 trouble reports (26%)

21   were closed as "TOK/FOK." In February, 60 of the 239 trouble reports (25%)

22   were closed as "TOK/FOK." In March, 60 of the 312 trouble reports (19%)

1   were closed as "TOK/FOK." Analysis of the troubles found for this sub-metric

2   revealed that a majority was related to cable and drop facilities distributed

3   throughout the state with no distinct pattern or trend.

4

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

6   (A.2.12.2.1.1) (January/February/March)

7   In January 2002, there were 5 troubles reported for the 48 orders completed

8   in the prior 30 days.   There were 3 troubles reported for the 43 orders

9   completed in the 30 days prior to February 2002. In March 2002, there were

10   4 troubles reported for the 51 orders completed in the prior 30 days. There

11   was no systemic pattern to the troubles reported in either January, February

12   or March 2002.

13

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

15   Dispatch (A.2.12.2.1.2) (February)

16   There were 18 troubles reported In February 2002 for this sub-metric for the

17   225 orders completed within the prior 30 days. Of the 18 total trouble reports,

18   7 of the trouble reports were due to a single cut cable.   There were no

19   patterns or systemic provisioning issues identified for the remainder of the

20   troubles.   BellSouth met the retail analogue comparison for this sub-metric in

21   January and March 2002.

22

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

2   (January/March)

3   BellSouth met the standard criteria for 64 of the 74 orders reviewed in

4   January and for 129 of the 140 orders reviewed in March 2002. The 95%

5   benchmark required that 71 of the 74 orders reviewed in January and 133 of

6   the 140 orders reviewed in March meet the criteria. BellSouth met the

7   benchmark for this sub-metric in February 2002.

8

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

10   (January)

11   There were only 11 orders reviewed for this sub-metric in January 2002.

12   BellSouth met the standard criteria for 10 of the 11 orders reviewed. With a

13   95% benchmark and a universe size of only 11 orders, problems with even

14   one order causes a miss for the entire sub-metric. BellSouth met the

15   benchmark for this sub-metric in February and March 2002.

16

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

18   (January/February/March)

19   BellSouth met the standard for 109 of the 125 orders reviewed in this sub-

20   metric for January, for 146 of the 155 orders reviewed in February and for 137

21   of the 150 orders reviewed in March 2002. The 95% benchmark set

22   requirements of 119 of the 125 orders for January, 148 of the 155 orders for

1   February and 143 of the 150 orders for March, based on the quantity of

2   orders for this sub-metric. BellSouth continues to focus on this measurement

3   in order to improve results to meet the benchmark

4

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

6   (A.2.25.2.1.2) (January/March)

7   BellSouth met the standard for 69 of the 74 orders reviewed in this sub-metric

8   for January and for 122 of the 130 orders reviewed in March 2002. The 95%

9   benchmark set a requirement of 70 of the 74 orders for January and 124 of

10   the orders reviewed in March, based on the quantity of orders for this sub-

11   metric.   BellSouth met or exceeded the benchmark for this sub-metric in

12   February 2002.

13

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

15   (January)

16   BellSouth met the standard for 11 of the 12 orders reviewed in this sub-metric

17   in January 2002. The 95% benchmark set requirements of all 12 of the 12

18   orders. With a sample size of 12 orders and a 95% benchmark, problems

19   with even one order causes a miss for the entire sub-metric. BellSouth met

20   the benchmark for this sub-metric in February and March 2002.

21

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

2   (A.2.25.2.2.2) (January/February/March)

3   BellSouth met the standard for 17 of the 20 orders reviewed in this sub-metric

4   for January, for 15 of the 16 orders reviewed in February and for 11 of the 13

5   orders reviewed in March 2002. The 95% benchmark set requirements of 19

6   of the 20 orders for January, all 16 of the 16 orders for February and all 13 of

7   the 13 orders for March 2002, based on the quantity of orders for this sub-

8   metric. BellSouth continues to focus on this measurement in order to improve

9   results to meet the benchmark.

10

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

12   (A.2.25.3.1.1) (February/March)

13   BellSouth met the standard for 54 of the 60 orders reviewed in this sub-metric

14   for February and for 30 of the 37 orders reviewed in March 2002. The 95%

15   benchmark set requirements of 57 of the 60 orders for February and for 36 of

16   the 37 orders for March, based on the quantity of orders for this sub-metric.

17   BellSouth continues to focus on this measurement in order to improve results

18   to meet the benchmark. BellSouth met the benchmark for this sub-metric in

19   January 2002.

20

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

22   (A.2.25.3.1.2) (March)

1   BellSouth met the standard for 90 of the 98 orders reviewed for this sub-

2   metric in March 2002. The 95% benchmark set a requirement that 94 of the

3   98 orders meet the standard, based on the quantity of orders for this sub-

4   metric.   BellSouth met the benchmark for this sub-metric in January and

5   February 2002.

6

7   <u>Service Order Accuracy / Design (Specials) / >= 10 Circuits / Non-Dispatch</u>

8   <u>(A.2.25.3.2.2) (January/February)</u>

9   BellSouth met the standard for 7 of the 10 orders reviewed for this sub-metric

10   in January and for 14 of the 17 orders reviewed in February 2002. The 95%

11   benchmark set requirements of all 10 orders for January and all 17 orders for

12   February, based on the quantity of orders for this sub-metric. With a 95%

13   benchmark and universe sizes of only 10 or 17 orders, problems with even

14   one order causes a miss for the entire sub-metric.   BellSouth met the

15   benchmark for this sub-metric in March 2002.

16

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

18

19   BellSouth met the relevant retail analogue comparisons for 89% of all the

20   Resale Maintenance & Repair measurements in January, 87% in February

21   and 94% in March 2002 for which there was CLEC activity.   The sub-metrics

1   for which BellSouth did not meet the retail analogues in January, February

2   and/or March 2002 were:

3

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

5   (January/February/March)

6   In the period January through March 2002, the CLECs had over 97% trouble

7   free service for lines in this sub-metric, and the difference between the CLEC

8   trouble report rate and the retail analogue was less than 1% each month. No

9   patterns or systemic maintenance issues were identified for the troubles in

10   this sub-metric.

11

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

13   In January the CLECs had over 98% trouble free service for this sub-metric

14   and although BellSouth missed the standard, the difference between the

15   trouble report rate for the CLECs and the retail analogue was only 0.3%.

16   BellSouth met the standard for this sub-metric in February and March 2002.

17

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

19   There were only 6 trouble reports for the 664 lines in service for this sub-

20   metric in February 2002. BellSouth provided over 99% trouble free service

21   for the in-service lines in this sub-metric for both CLECs and BellSouth retail

22   customers for the month.   When BellSouth provisions high quality service

1   coupled with very large universe sizes, it can cause an apparent out of equity

2   condition from a quantitative viewpoint.   In these cases, there is very little

3   variation and the universe size is so large that the Z-test becomes overly

4   sensitive to any difference. In other words, the statistical test shows that the

5   measurement does not meet the fixed critical value when compared with the

6   retail analogue, but BellSouth's actual performance for both CLECs and its

7   own retail operations is at a very high level – in this case over 99%. From a

8   practical point of view, the CLECs' ability to compete has not been hindered

9   even though the statistical results may technically show that BellSouth failed

10   to meet the benchmark/analogue.   BellSouth met the retail analogue

11   comparison for this sub-metric in January and March 2002.

12

13   <u>Customer Trouble Report Rate / Centrex / Dispatch (A.3.2.5.1)</u>

14   <u>(January/February)</u>

15   There were 26 trouble reports for this sub-metric in January 2002 for the 555

16   lines in service and only 6 trouble reports in February 2002 for the 460 lines in

17   service. BellSouth provided 95% trouble free service for both retail and the

18   CLECs for this sub-metric for January and over 98% trouble free service in

19   February. In February, 3 of the 6 trouble reports (50%) were closed as "no

20   trouble found." From a practical point of view, the CLECs' ability to compete

21   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 March 2002.

3

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

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 February and March 2002.

12

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

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 February and March 2002.

21

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

2   (January/March)

3   There were only 3 trouble reports for the 596 lines in service for this sub-

4   metric in January and 3 reports for the 563 lines in service in March 2002.

5   BellSouth provided over 99% trouble free service for both retail and the

6   CLECs for this sub-metric in both January and March. From a practical point

7   of view, the CLECs' ability to compete has not been hindered even though the

8   statistical results may technically show that BellSouth failed to meet the retail

9   analogue. BellSouth met the retail analogue comparison for this sub-metric in

10   February 2002.

11

12   Maintenance Average Duration / Business / Dispatch (A.3.3.2.1) (March)

13   The average repair interval for this sub-metric for CLEC orders for March

14   2002 was 12.87 hours compared to 9.52 hours for the retail analogue. Of the

15   61 total repair orders for the month associated with this sub-metric, only eight

16   orders missed the committed due date. Two repair orders had long durations

17   because they were received on Friday afternoons and not cleared until

18   Monday. Four of the orders had long durations due to a second dispatch to

19   have cable repairs performed. BellSouth met the retail analogue comparison

20   for this sub-metric in January and February 2002.

21

1   Maintenance Average Duration / Centrex / Dispatch (A.3.3.5.1)

2   (February/March)

3   There were only six trouble reports for this sub-metric in February and three

4   trouble reports in March 2002. The small universe of orders for the sub-

5   metric does not provide a statistically conclusive comparison to the retail

6   analogue. BellSouth met the retail analogue comparison for this sub-metric in

7   January 2002.

8

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

10   (February)

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 for this sub-metric in January and March 2002.

15

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

17   There were only six trouble reports for this sub-metric in February 2002. The

18   small universe for this measurement does not provide a statistically

19   conclusive comparison with the retail analogue. BellSouth met the retail

20   analogue comparison for this sub-metric in January and March 2002.

21

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

2   (February)

3   There was only one trouble report 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 January and March 2002.

7

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

9   There were only two repair orders associated with this sub-metric in February

10   2002. Such a small universe of orders for this sub-metric does not provide a

11   statistically conclusive comparison to the retail analogue. BellSouth met the

12   retail analogue comparison for this sub-metric in January and March 2002.

13

14   Resale – Billing

15

16   Invoice Accuracy (A.4.1) (January)

17   The CLECs experienced Resale invoice accuracy rates that were less than

18   the rates for the invoices BellSouth sent to its retail customers during January

19   2002 (99.42% accuracy for BellSouth versus 98.12% for the CLEC invoices).

20   The difference in performance was the result of Other Charges and Credits

21   (OC&Cs) that were issued in January to recover E911 billing for November

22   2001. BellSouth failed to bill E911 for November 2001 because of computer

1   program errors. As a preventative action plan, BellSouth will improve the

2   process it uses to test program changes. BellSouth met the standard for this

3   sub-metric in February and March 2002.

4

5   **III.   <u>Summary</u>**

6

7   As stated in the Introduction to the Analysis of Performance Measurements

8   section, BellSouth met or exceeded the benchmarks/retail analogues for 560

9   of the 622 sub-metrics (90%) for which there was CLEC activity in March

10   2001. In February 2002, 502 of 604 sub-metrics (91%) met or exceeded the

11   benchmarks or retail analogues. BellSouth met or exceeded the criteria for

12   562 of the 627 sub-metrics (90%) for which there was CLEC activity in

13   January 2002.

14

15   During the three-month period, January through March 2002, excluding the

16   measures discussed in the Introduction, there were a total of 549 sub-metrics

17   that had CLEC activity for all three months and that were compared with

18   either benchmarks or retail analogues. Of these 549 sub-metrics, 509 sub-

19   metrics (93%) satisfied the comparison criteria during at least two of the three

20   months.

21