1   **DISCUSSION OF PERFORMANCE MEASUREMENTS DATA**

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1   ***DISCUSSION OF PERFORMANCE MEASUREMENTS DATA***

2

3   **I. INTRODUCTION**

4

5   This Exhibit presents BellSouth's performance measurements data in

6   Kentucky for May 2001. The data covers each of the twelve categories of

7   measurements listed in the Interim Service Quality Measurements (SQM): (1)

8   Operations Support Systems (OSS) / Pre-Ordering; (2) Ordering; (3)

9   Provisioning including Customer Coordinated Conversions (CCC or Hot

10   Cuts); (4) Maintenance and Repair; (5) Billing; (6) Operator Services (Toll)

11   and Directory Assistance; (7) Database Update Information; (8) E911; (9)

12   Trunk Group Performance; (10) Collocation; (11) Change Management; and

13   (12) Bona Fide / New Business Request Process. Each of these categories

14   is subdivided into measurements as described below. Each of these

15   measurements are further broken down into sub-metrics, which is the level at

16   which performance data is actually provided. The performance data for

17   Kentucky is provided in Attachment 1.

18

19   **II. SUMMARY OF MEASUREMENTS**

20

21   **A. OSS / Pre-Ordering**

22   The OSS/Pre-ordering performance measurements cover the access and

23   response to queries by Competitive Local Exchange Carriers (CLECs),

24   including inquiries for loop makeup information. OSS Response Time data

25   reflects the time that elapses between a request for information that is sent

1   between a representative (BellSouth or CLEC) sending a request and

2   receiving a response. The interface availability measures validate the

3   availability of the OSS systems for the CLECs. The loop makeup inquiry

4   measures track the timeliness of responses to CLEC requests for loop

5   makeup information for unbundled loops for potential DSL type services. The

6   OSS/Pre-Ordering measurements in Attachment 1 are as follows:

7   • Average Response Time and Response Intervals of BellSouth's

8   OSS to queries by CLECs;

9   • Availability of Access to Pre-Ordering/Ordering OSS;

10   • Availability of Access to Maintenance & Repair OSS;

11   • Response Interval for Maintenance & Repair OSS;

12   • Loop Makeup Inquiry (manual); and

13   • Loop Makeup Inquiry (electronic).

14   BellSouth measures response time for Customer Service Records, Due Date

15   Availability, Address Validation, Product and Service Availability, and

16   Telephone Number Availability and Reservation.

17

18   **B. Ordering**

19   Performance data for the Ordering category provides information as to the

20   speed and quality of orders that are processed by BellSouth for the CLECs.

21   Because the ordering portion of the process for CLECs is different from the

22   ordering process for BellSouth's retail operation, the majority of these

23   measures are evaluated against benchmarks rather than retail analogues.

24   The Ordering measurements in Attachment 1 are as follows:

25   • Acknowledgement Message Timeliness;

1   •   Acknowledgement Message Completeness;

2   •   Percentage of Flow-Through Service Requests – Summary;

3   •   Achieved Percentage of Flow-Through Service Requests – Summary;

4   •   Percentage of Rejected Service Requests;

5   •   Rejection Interval;

6   •   Firm Order Confirmation (FOC) Timeliness;

7   •   Speed of Answer in the Ordering Center;

8   •   Service Inquiry with Firm Order for Unbundled Network Element (UNE)

9   xDSL loops;

10   •   Percentage of Rejected Service Requests for Local Number Portability;

11   •   Average Reject Interval for Local Number Portability;

12   •   Firm Order Confirmation Timeliness Average Interval for Local Number

13   Portability; and

14   •   Firm Order and Reject Response Completeness.

15 The disaggregation is by mechanized, partially mechanized and manual

16 orders for resale, UNEs and local interconnection trunks.

17

18 **C. Provisioning**

19 Provisioning performance measures address the quality and timeliness of

20 installation services provided to CLECs. The Provisioning measurements in

21 Attachment 1 are as follows:

22   •   Mean Held Order Interval;

23   •   Average Jeopardy Notice Interval and Percentage of Orders given

24   Jeopardy Notices;

25   •   Percentage of Missed Installation Appointments;

1   •   Average Order Completion Interval;

2   •   Average Completion Notice Interval;

3   •   Coordinated Customer Conversion;

4   •   Percent Completions/Attempts without Notice or < 24 hours Notice;

5   •   Cooperative Acceptance Testing of xDSL Loops;

6   •   Percentage of Troubles within 30 Days of Service Order Activity;

7   •   Total Service Order Cycle Time;

8   •   Service Order Accuracy;

9   •   Percent Missed Installation Appointments for Local Number Portability;

10   •   Average Disconnect Timelines Interval and Interval Distribution for

11   Local Number Portability; and

12   •   Total Service Order Cycle Time for Local Number Portability.

13 The disaggregation includes dispatched and non-dispatched intervals by less

14 than 10 circuits and equal to and greater than 10 circuits for resale, UNEs and

15 local interconnection trunks.

16

17 **D. Customer Coordinated Conversions (CCC or Hot Cuts)**

18 The measurements assessing the timeliness and quality of BellSouth's hot

19 cut process in Attachment 1 are as follows:

20   •   CCC – UNE Loops with Interim Number Portability (INP);

21   •   CCC – UNE Loops with Local Number Portability (LNP);

22   •   CCC Timeliness Report – Precut;

23   •   CCC Timeliness Report On Time;

24   •   CCC Timeliness Report - Post Cut;

25   •   CCC - Average Recovery Time; and

1   •   Percent Installation Troubles within 7 days of Hot Cut.

2   Because BellSouth does not perform hot cuts for its retail operations, the

3   majority of these measures are evaluated against benchmarks.

4

5   **E. Maintenance and Repair**

6   Maintenance and Repair measurements compare the maintenance, testing,

7   and other repair operations of BellSouth retail and wholesale services. The

8   Maintenance and Repair measurements in Attachment 1 are as follows:

9   •   Percentage of Missed Repair Appointments;

10   •   Customer Trouble Report Rate;

11   •   Maintenance Average Duration;

12   •   Percentage of Repeat Troubles within 30 days;

13   •   Percentage Out of Service greater than 24 hours;

14   •   Average Answer Time for the Repair Center; and

15   •   Mean Time to Notify CLEC of Network Outages.

16   The disaggregation includes dispatched and non-dispatched services for

17   resale, UNEs and local interconnection trunks.

18

19   **F. Billing**

20   The billing measurements reflect the timeliness and accuracy of BellSouth's

21   billing services provided to CLECs. The billing measures in Attachment 1 are

22   as follows:

23   •   Invoice Accuracy;

24   •   Mean Time to Deliver Invoices;

25   •   Usage Data Delivery Accuracy;

1   • Usage Data Delivery Completeness;

2   • Usage Data Delivery Timeliness;

3   • Mean Time to Deliver Usage;

4   • Recurring Charge Completeness; and

5   • Non-Recurring Charge Completeness

6   The disaggregation includes billed and adjusted revenues, Customer Record

7   Information System (CRIS) and Carrier Access Billing System (CABS) data,

8   and it is compared against BellSouth's retail operations.

9

10   **G. Operator Services (OS) (Toll) and Directory Assistance (DA)**

11   The purpose of these measures is to compare the operator functions for

12   BellSouth retail and CLEC calls. The OS/DA measurements in Attachment 1

13   are as follows:

14   • Average Speed of Answer (Toll);

15   • Average Speed of Answer (DA);

16   • Percent Answered within "X" Seconds (Toll); and

17   • Percent Answered within "X" Seconds (DA).

18   The equipment utilized by BellSouth provides parity by design. The switching

19   and operator equipment functions on a per call basis without knowledge of

20   the call's origination.

21
22   **H. Database Update Information**

23   The purpose of these measures is to compare the database update functions

24   for BellSouth retail and the CLECs.   The Database Update Information

25   performance measurements are as follows:

1 • Average Database Update Interval;

2 • Percent Database Update Accuracy; and

3 • Percent NXXs and LRNs Loaded by the Local Exchange Routing

4 Guide (LERG) Effective Date.

5 The standard for the Interval and Accuracy measurements is parity-by-design.

6 The standard for the load effective date measurement is by benchmark.

7

8 **I. E911**

9 The SQM E911 measurements in Attachment 1 are as follows:

10 • Timeliness;

11 • Accuracy; and

12 • Mean Interval to deliver service.

13 The purpose of these measures is to review the E911 functions for BellSouth

14 retail and CLEC calls. The BellSouth equipment provides parity by design.

15 The switching and E911 equipment function on a per call basis without

16 knowledge of the call's origination.

17

18 **J. Trunk Group Performance**

19 The purpose of this measurement is to assess the performance of trunk

20 groups administered by BellSouth that are outgoing from BellSouth's switches

21 to CLEC switches.

22 The Trunk Group Performance report is covered in detail later in this Exhibit.

23

24 **K. Collocation**

1   The Collocation measurements provide information regarding the timeliness

2   of the provisioning by BellSouth of collocation arrangements to CLECs. The

3   collocation measures in Attachment 1 are as follows:

4   • Average Response Time;

5   • Average Arrangement Time; and

6   • Percentage of Due Dates Missed.

7   The disaggregation includes virtual and physical arrangements. The physical

8   arrangements are further disaggregated with caged and cageless sub-

9   metrics. Because BellSouth does not provide collocation to its retail units,

10   these measures are evaluated against benchmarks rather than retail

11   analogues.

12

13   **L. Change Management**

14   The SQM Change Management measurements in Attachment 1 are as

15   follows:

16   • Timeliness of Change Notices;

17   • Average Delay Days for Change Notices;

18   • Timeliness of Documents associated with Change;

19   • Change Management Documentation Average Delay Days; and

20   • Notification of CLEC Interface Outages

21   Because BellSouth does not provide a change management process to its

22   retail units, these measures are evaluated against benchmarks rather than

23   retail analogues.

24

25   **M. Bona Fide / New Business Request Process**

1   The SQM Change Management measurements in Attachment 1 are as

2   follows:

3   • Percentage of BFR/NBR Requests Processed within 30 Business

4   Days and

5   • Percentage of Quotes Provided for Authorized BFR/NBR Requests

6   Processed Within X (10/30/60) Business Days

7

8   **N. Data Availability and Format**

9   BellSouth's performance data is routinely available to both regulators and

10   CLECs. Each month, BellSouth posts performance measurement reports on

11   its Internet web site: *https://pmap.bellsouth.com*. Each CLEC has available

12   the aggregate data for all CLECs and BellSouth's retail analogues.   In

13   addition, individual CLECs can access their own CLEC-specific data via a

14   password that ensures the privacy of the data.

15

16   For ease of reference, BellSouth has created a user-friendly summary of

17   BellSouth's SQM reports in Kentucky called the Monthly State Summary

18   (MSS). The MSS depicts the performance results for each sub-metric, and is

19   included as Attachment 1. This summary is divided into six (6) mode of entry

20   categories: (A) Resale; (B) Unbundled Network Elements; (C) Local

21   Interconnection Trunking; (D) Operations Support Systems; (E) Collocation,

22   and (F) General. Each mode of entry category is subdivided into sections,

23   i.e., pre-ordering, ordering, provisioning, maintenance & repair, and billing.

24   Each section is then subdivided into various levels of disaggregation, e.g.,

25   product, circuit quantity, need for dispatch, etc., as defined by the SQM.

1

2   An example will demonstrate how Attachment 1 can be used. Suppose the

3   reader wished to find the chart for the resale ordering measurement "percent

4   rejected service requests" on resale orders for residence local service

5   requests (LSRs) submitted electronically in Kentucky for CLECs. On the first

6   page of Attachment 1, the example would be reflected as: (A) Resale; (1)

7   Ordering; (1) % Rejected Service Requests-Mechanized; (1) Residence; or

8   A.1.1.1.   The results representing this measurement will be at location

9   A.1.1.1. The data included at each location will show the SQM reference and

10   title, approved benchmark/analogue, and actual results for CLECs. Where a

11   retail analogue applies, results for BellSouth retail performance appear along

12   with the standard deviation, standard error, and statistical modified Z-score.

13

14   **III. STATISTICAL TESTING**

15

16   The SQM applies the modified-Z statistical methodology to those measures

17   that are assessed against a retail analogue. The modified-Z is a standard

18   statistical hypothesis test that incorporates into the methodology the actual

19   differences in BellSouth's performance between retail and wholesale

20   functions/activities, and the amount of variation in the underlying data being

21   assessed. In the *Bell Atlantic – New York* 271 decision (In the Matter of

22   Application of Bell Atlantic New York for Authorization Under Section 271 of

23   the Communications Act To Provide In-region, InterLATA Service in the State

24   of New York, CC Docket 99-295, Appendix B, Released 12/22/99), the

25   Federal Communications Commission (FCC) held that the modified Z-test

1 used by Bell Atlantic for comparing performance measurements with large

2 sample sizes was an appropriate statistical methodology. The FCC also

3 affirmed Southwestern Bell –Texas' use of the modified Z-test to offset the

4 effect of random variation within individual measurements in the *Texas 271*

5 decision. BellSouth utilizes the same modified Z-test as Bell Atlantic and

6 Southwestern Bell to determine the material significance of variations

7 between services provided by BellSouth to CLECs and services provided by

8 BellSouth to its own retail units. This statistical methodology is the Local

9 Competition Users Group ("LCUG") modified Z-score. A score of below –

10 1.645 provides a 95% confidence level that the variables are different, or that

11 they come from different processes. This is the standard by which the retail

12 analogue comparison is made. As recognized by the FCC, the modified Z-

13 test is an appropriate statistical methodology to use when comparing state

14 level CLEC-aggregated results to state level BellSouth retail results.

15

16   **IV. ANALYSIS OF PERFORMANCE MEASUREMENTS**

17

18   **A. Introduction**

19

20 Attachment 1 is the Monthly State Summary (MSS) for Kentucky for May

21 2001. The MSS contains 2,250 sub-metrics. For 775 of the sub-metrics,

22 there was no CLEC activity to capture in May. Of the remaining 1,475 sub-

23 metrics, there were 487 sub-metrics for which there were both established

24 benchmarks/retail analogues and CLEC activity. BellSouth met or exceeded

25 the criteria for 414 of these 487 sub-metrics, or 85%. All measures and sub-

1   metrics are included in these calculations. BellSouth has identified three

2   measures that are currently under investigation that have known deficiencies

3   in their calculations. They are Average Jeopardy Notice Interval, FOC &

4   Reject Completeness, and LNP Disconnect Timeliness.

5

6   Two general issues can impact the degree to which BellSouth's performance

7   data is meaningful. First, the extreme disaggregation of the data in the

8   reports often dilutes the universe size of individual measurements, which in

9   turn reduces the confidence level of each of the individual Z-test results. As a

10   result, there are many performance measurements for which the results are

11   statistically inconclusive due to the small number of observations. Second, in

12   situations in which there are a large number of observations and the

13   difference between the means is very small, the results can be misleading

14   and not indicative of the absolute level of performance that BellSouth

15   provides to CLECs.

16

17   With respect to the first issue, in many cases, the extensive levels of

18   disaggregation leads to numerous sub-metrics with fewer than 30

19   observations, which is generally accepted as the smallest number of

20   observations for application of the Z-test. Despite this fact, BellSouth has

21   reported results for all of the measures, even those with statistically

22   inconclusive universe sizes.

23

24   The second issue arises in situations where BellSouth provides very high

25   quality service to both BellSouth's retail units and the CLECs, where there are

1   very large universe sizes, and the difference between the means is very

2   small. This scenario can cause an apparent missed condition from a

3   quantitative viewpoint. For example, in May 2001, the Customer Trouble

4   Report Rate (CTRR), for Resale PBX / Non-Dispatch (A.3.2.4.2) showed that

5   BellSouth retail had 0.14% troubles reported for 24,928 in service lines. The

6   CLEC CTRR for the same period is 0.46% troubles reported for 869 in service

7   lines. While there is very little difference in the results, only one third of a

8   percentage point, the universe is so large that the Z-test becomes overly

9   sensitive to any difference. As a result, the statistical test shows that the sub-

10   metric missed the standard criteria but BellSouth's actual performance is at a

11   very high level for both the CLECs and BellSouth retail, in this case, greater

12   than 99.5%. From a practical point of view, the CLECs' ability to compete has

13   not been hindered, even though the statistical result does not technically meet

14   the retail analogue.

15

16   In reviewing the data, the Kentucky Public Service Commission (Commission)

17   should use the data as a tool in analyzing whether BellSouth has met its

18   commitments. It is not a substitute for the qualitative evaluation of

19   BellSouth's performance. The commission will still need to conduct a

20   qualitative assessment of the data that considers, among other things,

21   universe size, distributional properties of the data, as well as overall

22   performance.

23

24   The following paragraphs will address specific performance measurements

25   associated with each checklist item. A matrix that provides a cross reference

1   of the measurements included in the MSS to the 14 point checklist is included

2   in Attachment 4.

3

4

5   **B. CHECKLIST ITEM 1 – INTERCONNECTION**
6

7   **1. Collocation**

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

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

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

11   results. BellSouth met the approved benchmarks for all 5 of the 5 sub-metrics

12   with CLEC activity in May 2001.

13

14   **2. Local Interconnection Trunking**

15   Trunking Reports

16   Attachment 1, Section C, Items C.1.1 to C.4.2 of the MSS contains data for

17   ordering, provisioning, maintenance and repair, and billing associated with

18   Local Interconnection Trunks.

19

20   In May 2001, BellSouth met 11 of 12 sub-metrics or 92% of the applicable

21   benchmarks/analogues for all local interconnection trunking measures having

22   CLEC activity. The trunk blockage measurement was the only sub-metric that

23   appears to have been missed in May 2001. As I explain later, the data does

24   not indicate disparate treatment between blockage for BellSouth versus the

25   CLECs.

26

1   Trunk Blockage

2   BellSouth has developed a trunk blocking report that compares BellSouth

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

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

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

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

7   comparable trunk groups administered by BellSouth that handle CLEC and

8   BellSouth traffic. Time consistent busy hour blocking data for each trunk

9   group is provided to each CLEC for its trunk groups. In order to ensure that

10   all possible trunks in the network were considered for inclusion and exclusion

11   in the trunk blocking comparison process, BellSouth has analyzed all trunks,

12   their roles in the network according to use and their interconnection

13   arrangements.   Additionally, the TGP report provides a direct comparison of

14   hour-by-hour blocking between CLEC and BellSouth trunk groups. The Trunk

15   Group Categories included in the Blocking Comparison are as follows:

16

17   For Traffic Terminating at CLEC End Offices:

18   • Category 1 (BellSouth End-Office to BellSouth Access Tandem)

19   • Category 3 (BellSouth End-Office to CLEC Switch)

20   • Category 4 (BellSouth Local Tandem to CLEC Switch)

21   • Category 5 (BellSouth Access Tandem to CLEC Switch)

22   • Category 10 (BellSouth End-Office to BellSouth Local Tandem)

23   • Category 16 (BellSouth Inter-Tandem Trunk Groups)

24

25   For Traffic Terminating at BellSouth End Offices:

1 • Category 9 (BellSouth End-Office to BellSouth End-Office)

2

3 BellSouth's approach ensures the inclusion of comparative data that will

4 permit a more complete comparative analysis. The new measurement

5 method provides direct and clear comparison of blocking levels for all relevant

6 trunk groups**.** BellSouth's proposed Interim SQM, Exhibit AJV-1 filed with my

7 May 20th Affidavit, also describes how BellSouth derives and calculates its

8 performance data, including trunk blockage data. In addition, Section C.5.1,

9 TGP (Attachment 3 to this Exhibit) shows the actual blocking percentages by

10 hour. The Self Effectuating Enforcement Mechanism (SEEM)

11 Analogue/Benchmark for the Trunk Group Performance measure is any two

12 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage

13 by more than 0.5%. Report C.5.1 in Attachment 1 indicates CLEC blockage

14 that exceeded BellSouth retail by more than 0.5% for the eight and nine

15 o'clock hours. A detailed analysis indicated that one entire trunk group was

16 out of service from just before 9:00 am until a few minutes after nine on May

17 26, 2001. As confirmed by the CLEC, the CLEC had scheduled a

18 maintenance event without notifying BellSouth and took the entire trunk group

19 out of service. Without this outage, the trunk blockage would have met the

20 measurement criteria for May 2001.

21

22 **C. <u>CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)</u>**
23

24 This section addresses the measures associated with UNEs under checklist

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

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

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

2   19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair

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

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

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

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

7   in the checklist item as shown below:

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

| 1 | INP Standalone | #11 – Local Number Portability |
| 2 | LNP Standalone | #11 – Local Number Portability |

3

4 An overall review of the UNE sub-metrics for Ordering, Provisioning,
5 Maintenance & Repair and Billing indicates that BellSouth met the
6 benchmark/analogue for 86% of the sub-metrics during the month of May
7 2001.

8

9 **1. UNE Ordering Measures**

10

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

15

16 **Percent Rejected Service Requests**
17 Results for individual CLECs in this measure vary. Some CLECs have few
18 rejected service requests, while some CLECs have many. Of the CLECs
19 submitting LSRs, five of the seven CLECs that submitted the largest volumes
20 of fully mechanized LSRs had rejection rates ranging from 5% to 11%.

21

22 In order to lower the rejection rate for individual CLECs, BellSouth has
23 developed an action plan template to be used in conjunction with an analysis
24 of the pre-order and order activity of a CLEC who is performing at less than
25 90% on flow-through on mechanically submitted orders and has a clarification

1 rate of 20% or higher.   So far, seven CLECs in the BellSouth region have

2 agreed to utilize this template.   Five CLECs have had presentations

3 concerning their individual results and are currently reviewing the proposals.

4 Meetings are being scheduled with two additional CLECs and twenty-two

5 others are either in the final stages of the action plan preparation or data

6 analyzation. The initial results after implementation indicates a 5% overall

7 reduction in clarifications and rejected requests. See Attachment 5 for the

8 details of these Action Plans.

9

10 **Reject Interval**

11 Items B.1.4 - B.1.8 in Attachment 1 examine the Reject Interval for the month

12 of May 2001. For orders submitted electronically, the benchmark is 97%

13 within one hour. In May, 62% of the rejected service requests were delivered

14 within the one-hour time period.   (See the write-up below for further

15 discussion concerning electronically submitted orders.)

16

17 For partially mechanized orders, which are LSRs submitted electronically and

18 requiring service representative intervention, the current benchmark is 85%

19 within 18 hours. In May, BellSouth exceeded this benchmark, with over 99%

20 of partially mechanized rejects being returned to the CLECs within the 18-

21 hour time period.

22

23 For manual orders, the current benchmark is also 85% within 24 hours.

24 BellSouth also exceeded this requirement, with over 92% of the LSRs

1   submitted manually being returned to the CLECs within the 24-hour time

2   period in May 2001.

3

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

5   2001:

6

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

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

9   The current benchmark for these two sub-metrics is >= 97% within one hour.

10   With the implementation of May data BellSouth was directed to change the

11   time stamp identification for the start and complete times of the interval for

12   this measurement from the Local Exchange Ordering (LEO) System to the

13   CLEC ordering interface system (TAG or EDI). With this change BellSouth

14   was unable to identify multiple issues of the same version of the LSRs that

15   may be rejected (fatal rejects), which should be excluded from the

16   measurement. If there are multiple issues of the same version, the measure

17   currently calculates the interval from the initial issue to the final issue of the

18   LSR returned to the CLEC, Reject or FOC. Consequently, BellSouth's

19   performance level is inappropriately understated. BellSouth is currently

20   working to determine a fix for this issue.

21

22   BellSouth is conducting a detailed root cause analysis of the process for

23   electronic rejects. This analysis addresses the ordering systems (EDI, TAG,

24   and LENS) used by the CLECs and the back-end legacy applications, such

25   as SOCS, that are accessed by the ordering systems.

1

2   Thus far, the analysis has determined that many of the LSRs that did not

3   meet the one-hour benchmark were issued between 11:00 p.m. and 4:30 a.m.

4   Between these hours the system is unable to process LSRs because of the

5   back-end legacy systems are out of service. Such hours should be excluded

6   from the measurement. BellSouth is currently reviewing the scheduled down

7   time for all systems and how that down time affects the ordering capability of

8   the CLECs.

9

10   With the May update, the data for the UNE Loop & Port Combination is being

11   included in the UNE Other Non-Design sub-metric. BellSouth is currently

12   reviewing the programming for these products to determine their correctness.

13

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

15   BellSouth met the one hour benchmark for 54 of the 56 LSRs (96.43%)

16   rejected in this sub-metric for May 2001. The 97% benchmark allowed for

17   only one miss with this volume of LSRs.

18

19   Reject Interval / Local Interoffice Transport / Partially Mechanized (B.1.6.2)

20   There were only six orders in this sub-metric for May 2001 with BellSouth

21   meeting the benchmark for five of them. Such a small universe does not

22   produce a statistically conclusive benchmark comparison.

23

24   Reject Interval / Other Design / Partially Mechanized (B.1.6.14)

1   There were only six orders in this sub-metric for May 2001 with BellSouth

2   meeting the benchmark for five of them. Such a small universe does not

3   produce a statistically conclusive benchmark comparison.

4

5   Reject Interval / xDSL / Manual (B.1.8.5)

6   There were only three orders in this sub-metric for May 2001 with BellSouth

7   meeting the benchmark for two of them. Such a small universe does not

8   produce a statistically conclusive benchmark comparison.

9

10   FOC Timeliness

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

12   returned within 3 hours. For partially mechanized LSRs, the benchmark is

13   85% returned within 18 hours. For LSRs submitted manually, the benchmark

14   is 85% returned within 36 hours. In May 2001, BellSouth met all but one of

15   the benchmarks associated with the FOC timeliness sub-metrics. The sub-

16   metric that did not meet the benchmark in May is as follows:

17

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

19   BellSouth met the benchmark for 305 of the 350 LSRs for this sub-metric in

20   May 2001. With the implementation of May data BellSouth was directed to

21   change the time stamp identification for the start and complete time of the

22   interval for this measurement from the Local Exchange Ordering (LEO)

23   System to the CLEC ordering interface system (TAG or EDI). With this

24   change BellSouth is unable to identify multiple issues of the same version of

25   the LSRs that may be rejected (fatal rejects), which should be excluded from

1 the measurement. If there are multiple issues of the same version, the

2 measure currently calculates the interval from the initial issue to the final

3 issue of the LSR returned to the CLEC, Reject or FOC. Consequently,

4 BellSouth's performance level is inappropriately understated. BellSouth is

5 currently working to determine a fix for this issue.

6

7 FOC & Reject Response Completeness

8 This measurement was introduced with the March 2001 data month. The

9 benchmark is 95%. In this sub-metric, BellSouth did not meet the benchmark

10 in May 2001 for the FOC and Reject Response Completeness metrics listed

11 below:

12

13 FOC & Reject Response Completeness / Combo (Loop + Port) / Electronic

14 (B.1.14.3)

15 FOC & Reject Response Completeness / xDSL / Electronic (B.1.14.5)

16 FOC & Reject Response Completeness / 2w Analog Loop Design /

17 Electronic (B.1.14.8)

18 FOC & Reject Response Completeness / Other Non-Design / Electronic

19 (B.1.14.15)

20 FOC & Reject Response Completeness (Multiple Responses) / Local

21 Interoffice Transport / Partial Electronic (B.1.18.2)

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

23 / Partial Electronic (B.1.18.14)

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

25 Loop Design / Manual (B.1.19.8)

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

2   Loop Non Design / Manual (B.1.19.9)

3

4   BellSouth has determined that the coding for the FOC and Reject

5   Completeness measures failed to include rejections that were classified as

6   "auto clarifications." This coding change, which was implemented at the end

7   of May, will impact all FOC and Reject Completeness measures that include

8   auto clarification rejects.

9

10   Flow-Through

11

12   Attachment 1, 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 2. The following table

15   shows the Regional Flow-Through results for May 2001 as compared with the

16   Interim SQM benchmarks.

17

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

19

Customer Type	May 2001	Benchmark
Residence	90.25%	95%
Business	61.15%	90%
UNE	74.80%	85%
LNP	90.65%	85%

20

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

22   handling.   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's flow-through rates will continue to improve. BellSouth has formed

8   a joint BellSouth/CLEC Flow-Through Improvement Task Force to specifically

9   address this issue. The Task Force will operate as a subcommittee of the

10 existing Change Control Process. The first meeting was held on February 28,

11 2001. The objective of the Task Force is to work jointly to identify potential

12 enhancements to electronic order flow-through, document those

13 enhancements, and develop an implementation schedule. Fifteen CLECs

14 and BellSouth were represented at the initial meeting.

15

16 On March 19, 2001, the Flow-Through Improvement Task Force met at the

17 BellSouth Conference Center (BSCC). Fourteen CLECs and BellSouth were

18 represented.   The Task Force agreed upon a definition for flow-through for

19 purposes of the Task Force. In addition, the Task Force discussed further the

20 role of the Task Force and status of the existing flow-through changes.

21 BellSouth expects the work of the Task Force to improve the process of flow-

22 through.

23

24 The Flow-Through Task Force met on May 24, 2001, with agreement being

25 reached to identify specific areas of concentration for the team. All attendees

1   agreed that the Task Force would be better focused on the areas it was

2   created to examine with this identification. The team prioritized eight items

3   that had previously been identified. Action items were assigned with follow-

4   up meetings to be scheduled based on status of the prioritized items.

5

6   **2. UNE Provisioning Measures**

7   BellSouth met 88% of the overall UNE Provisioning measurements in the

8   month of May 2001.

9

10 The following sub-metrics did not meet the applicable retail analogues in the

11 month of May 2001:

12

13 <u>% Jeopardy Notice Interval >= 48 hours / Combo (Loop & Port) / < 10</u>

14 <u>Circuits (B.2.10.3)</u>

15 The calculations for this measure have been determined to be incorrect.

16

17 **Completion Notice Interval**

18 Item B.2.21 – B.2.22 of Attachment 1 provides data for the "Average

19 Completion Notice Interval" measurements.   BellSouth did not meet the

20 required benchmarks/analogues on the following specific sub-metrics:

21

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

23 <u>Non-Dispatch (B.2.21.3.1.2)</u>

24 <u>Average Completion Notice Interval / LNP(Standalone) / < 10 Circuits / Non-</u>

25 <u>Dispatch (B.2.21.17.1.2)</u>

1   The root cause analysis of these measures indicated that the only differences

2   between the performance between BellSouth retail and CLECs are the

3   mismatches found when the orders are compared with the original LSRs.

4   The start of the completion interval is the point at which the technician

5   completes the order, and the interval ends when the completion notice is

6   sent. Any change to a name, number of items, etc., occurring during the

7   provisioning process will generate inconsistencies with the original LSRs that

8   must be resolved before a final completion notice can be sent. Any time to

9   resolve these inconsistencies with the original LSRs is included in the

10 average.   Because of numerous CLEC changes and order updates,

11 mismatches on CLECs orders exceed those for BellSouth retail orders.

12 Combining this with the smaller base for the CLECs' measurement raises the

13 average, which results in a miss.

14

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

16 (B.2.34.1.1.1)

17 BellSouth met the standard for 28 of the 31 orders reviewed in this sub-metric

18 for May 2001. The 95% benchmark set a requirement of 29 based on the

19 quantity of orders for this sub-metric. BellSouth continues to focus on this

20 measurement.

21

22

23 Service Order Accuracy / Loops Non Design / < 10 Circuits / Dispatch

24 (B.2.34.2.1.1)

1   BellSouth met the standard for 46 of the 51 orders reviewed in this sub-metric

2   for May 2001. The 95% benchmark set a requirement of 48 based on the

3   quantity of orders for this sub-metric. BellSouth continues to focus on this

4   measurement.

5

6   BellSouth met all other UNE provisioning measures for the sub-metrics

7   included in this checklist item for May 2001.

8

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

10 BellSouth met the applicable performance standard for 88% of the overall

11 UNE M&R measurements. The sub-metric that did not meet the fixed critical

12 value for this checklist item is as follows:

13

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

15 The difference between the retail analogue and the CLEC aggregate was less

16 than 2% for this sub-metric in May 2001. Both the CLECs and BellSouth

17 retail had greater than 98% trouble free service for all in service lines in this

18 sub-metric in May. Eleven of the twenty CLEC troubles reported were due to

19 a defective card problem within the central office.

20

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

22 The difference between the retail analogue and the CLEC aggregate was less

23 than 2% for this sub-metric in May 2001. Both the CLECs and BellSouth

24 retail had greater than 98% trouble free service for all in service lines in this

25 sub-metric in May. Seven of the seventeen troubles were closed as test OK.

1   Seven of the remaining ten troubles were due to the CLEC internally

2   changing the disconnect date but not sending in a change to BellSouth. All

3   seven orders had to be reestablished.

4

5   <u>Customer Trouble Report Rate / Other Non Design / Non Dispatch</u>

6   <u>(B.3.2.11.2)</u>

7   The difference between the retail analogue and the CLEC aggregate was less

8   than 3% for this sub-metric in May 2001. Both the CLECs and BellSouth

9   retail had greater than 97% trouble free service for all in service lines in this

10   sub-metric in May. Four of the fourteen troubles were closed as test OK. The

11   repair personnel are being instructed to do more definitive testing before

12   referring these troubles to the field.

13

14   <u>Out of Service > 24 hours / Other Non-Design / Non Dispatch (B.3.5.11.2)</u>

15   There were only two reports in this sub-metric for May 2001 with one of them

16   being out of service greater than 24 hours. Such a small universe does not

17   produce a statistically conclusive comparison with the retail analogue.

18

19   **4. Other UNE Measures**

20

21   **Pre-Ordering**

22   Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1.1) and

23   Loop Makeup Electronic (F.2.2.1) are included in the Pre-Ordering

24   measurements. All measures met the established benchmarks for May 2001

25   as shown in Attachment 1.

1

2   The remainder of the UNE measurements for which BellSouth did not meet

3   the applicable analogue or benchmark in May 2001 is as follows:

4

5   **Operations Support Systems**

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

7   benchmark/retail analogue in May 2001 were:

8

9   <u>Average Response Interval – CLEC (LENS) / HAL / CRIS / Region / < 4</u>

10   <u>seconds (D.1.3.5.1)</u>

11   <u>Average Response Interval – CLEC (LENS) / HAL / CRIS / Region / < 10</u>

12   <u>seconds (D.1.3.5.2)</u>

13   BellSouth averaged 12.61 seconds response interval for the CLECs, which is

14   approximately nine seconds longer than the retail analogue. A detailed

15   analysis has identified a problem in the LENS software that deals with

16   response times from HAL/CRIS. This will be corrected in an update

17   scheduled for release on July 27, 2001.

18

19   <u>Average Response Interval / CRIS / Region (D.2.4.1.1)</u>

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

21   separate disaggregations. The percentage of queries that are responded to

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

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

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

25   both the less than 10 and greater than 10 seconds responses. The CLEC

1   response interval was 94.25% within 4 seconds as compared with 95.65% for

2   the retail analogue.   For the less than 10 second response, the CLECs

3   received 99.03% of their responses and the retail analogue received 98.82%.

4   The one percent difference for both of these intervals indicates equivalent

5   service levels for the CLECs and BellSouth retail.

6

7   Average Response Interval / LMOSupd / Region (D.2.4.5.1)

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

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

13   both the less than 10 and greater than 10 seconds responses. The CLEC

14   response interval was 98.04% within 4 seconds as compared with 98.22% for

15   the retail analogue.   For the less than 10 second response, the CLECs

16   received 98.94% of their responses and the retail analogue received 98.73%.

17   The less than one percent difference for both of these intervals indicates

18   equivalent service levels for the CLECs and BellSouth retail.

19

20   Average Response Interval / LNP / Region (D.2.4.6.1, D.2.4.6.2, D.2.4.6.3)

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

22   separate disaggregations. The percentage of queries that are responded to

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

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

25   analogue intervals for all three of these sub-metrics in May2001. For each of

1   the three sub-metrics, there was less than a 0.25% difference in the

2   responses received by the CLECs and BellSouth retail.   The 0.25 percent

3   difference for all of these intervals indicates equivalent service levels for both

4   the CLECs and BellSouth retail.

5

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

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

8   separate disaggregations. The percentage of queries that are responded to

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

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

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

12   both the less than 10 and greater than 10 seconds responses. The CLEC

13   response interval was 99.28% within 4 seconds as compared with 99.62% for

14   the retail analogue.   For the less than 10 second response, the CLECs

15   received 99.84% of their responses and the retail analogue received 99.84%.

16   The less than one-half percent difference for these intervals indicates

17   equivalent service levels for the CLECs and BellSouth retail.

18

19   **General - Change Management**

20   % Software Release Notices sent on time (F.10.1)

21   There were only four releases in this sub-metric for May 2001 with BellSouth

22   meeting the benchmark for three of them. Such a small universe does not

23   produce a statistically conclusive benchmark comparison.

24

25   **General – Billing**

26   Usage Data Delivery Accuracy (F.9.1)

1   This measure compares the rate at which usage data is sent accurately to

2   CLECs with the same measure for the BellSouth retail analogue. In May

3   2001, a software problem caused an error for one CLEC which dropped the

4   results to 99.99% compared to BellSouth's 100%. Out of approximately

5   14,000 packs (or groupings) of usage data sent to CLECs in May, only one of

6   the packs was impacted by the problem. Once the software was fixed, the

7   corrected pack data was resent successfully to the CLEC.

8

9   <u>Mean Time to Deliver Usage (F.9.4)</u>

10   This measure compares the average number of days to deliver usage to

11   CLECs with the BellSouth retail analogue. In May 2001, the CLEC result was

12   3.76 days compared to BellSouth's 3.73 days. While the CLEC measurement

13   is slightly greater than the BellSouth results, the CLECs are provided with

14   substantially the same opportunity to bill end users as is BellSouth.

15

16   **<u>General – Ordering</u>**

17   <u>% Acknowledgement Message Timeliness / EDI (F.12.1.1)</u>

18   A root cause analysis has identified 8,856 of 10,010 (88%) failed EDI

19   acknowledgements were submitted by the Florida Third Party Test CLEC and

20   are not being filtered out of the acknowledgement calculations. With the

21   removal of these test messages the results would have been 98.8%, well

22   above the 90% benchmark for this sub-metric in May 2001.

23

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

2   BellSouth experienced EDI outages in May that caused 723 of the over

3   96,000 acknowledgement messages to not be returned. A Stability Plan to

4   improve EDI availability has been put into effect.   This plan includes

5   implementing both a manual application monitoring schedule (24 / 7) and

6   increased mechanized application alarms to more adequately monitor and

7   react to application outages.   The database parameters have also been

8   adjusted to allow for maximum processing in the EDI system.

9

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

11   BellSouth failed to deliver 16 of the 183,966 messages in May 2001 for this

12   sub-metric.   Analysis continues to identify any issues in this process.

13   However, such a small number of failed records have not revealed any

14   systemic process problems

15

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

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

18   provide data for provisioning and maintenance & repair measures for

19   unbundled local loops.

20

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

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

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

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

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

2 loop sub-metrics.

3

4 **xDSL Group**

5

6 **1. Provisioning Measures**

7 BellSouth met all the provisioning sub-metrics in this checklist item for the

8 month of May 2001.

9

10 The xDSL group sub-metrics that did not meet the fixed critical value

11 comparison requirements for May 2001 are as follows:

12

13 **2. Maintenance & Repair Measures**

14

15 Customer Trouble Report Rate / xDSL Loops / Non Dispatch (B.3.2.5.2)

16 The CLEC aggregate only reported three troubles for this sub-metric in May

17 2001. Both the CLECs and BellSouth retail had greater than 99% trouble free

18 service for all in service lines in this sub-metric in May.

19

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

21 The CLEC aggregate only reported two troubles for this sub-metric in May

22 2001. Both the CLECs and BellSouth retail had greater than 99% trouble free

23 service for all in service lines in this sub-metric in May.

24

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

1   The CLEC aggregate only reported one trouble for this sub-metric in May

2   2001. Both the CLECs and BellSouth retail had greater than 99% trouble free

3   service for all in service lines in this sub-metric in May.

4

5   **SL1/SL2/Digital Loop Group**

6

7   BellSouth met all sub-metrics for this Group in May 2001.

8

9   **E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT**
10

11   The   data   in   these   measures   indicate   that   BellSouth   met   the

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

13   for May 2001.
14

15

16   **F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING**
17

18   The   data   in   these   measures   indicate   that   BellSouth   met   the

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

20   for May 2001.

21

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

23   **H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR**

24   **SERVICES**
25

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

27   benchmark/analogue requirements of Checklist Items 7a and 7b in May 2001.

1   Even though BellSouth tracks and reports these measures, the processes

2   used in providing these services are designed to provide parity for all users.

3

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

5   **SIGNALING**

6   BellSouth made three of the four sub-metrics associated with this checklist

7   item in May 2001. See items F.13.3.1 through F.13.3 in Attachment 1 for

8   further details. The one item that did not meet the appropriate benchmark in

9   May 2001 is as follows:

10

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

12   The measure indicates that only 21 of the 33 NXXs were loaded by their

13   effective date for the entire BellSouth region. There were no missed dates in

14   Kentucky for this sub-metric in May 2001.

15

16   **I.   CHECKLIST ITEM 11 – NUMBER PORTABILITY**

17

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

19   2001 except for the following:

20

21   Order Completion Interval / LNP (Standalone)) / < 10 Circuits / Non Dispatch

22   (B.2.1.17.1.2)

23   The unadjusted order completion interval, as shown in Attachment 1, was

24   2.40 days compared to the retail analogue of 1.03 days. A root cause analysis

25   for OCI for Non-Dispatch orders revealed that BellSouth was offering a 0 to 2-

26   day interval on retail non-dispatched POTS orders, but the UNE combination

1   loop and port non-dispatched orders were receiving the same interval as

2   "dispatched" orders. The permanent solution for this problem, a modification

3   to the due date calculation process, was implemented on June 2, 2001.

4   BellSouth is currently evaluating the results of this system modification.

5

6   In addition to the appointment interval issue, OCI is adversely affected by

7   LSRs for which CLECs request intervals beyond the offered interval and do

8   not enter an "L" code on the order. When a CLEC requests an interval

9   beyond the interval offered by BellSouth, the CLEC is supposed to enter an

10   "L" code on the LSR. "L" coded orders are excluded from the OCI metrics.

11

12   <u>Disconnect Timeliness / LNP / < 10 Circuits (B.2.31.1)</u>

13   The Disconnect Timeliness measure is supposed to track the time it takes to

14   disconnect a number in the central office switch after the message has been

15   received from the Local Number Portability (LNP) Gateway that it is ready.

16   However, this measurement does not track the relevant time to perform this

17   function.

18

19   On a great majority of LNP orders, BellSouth creates what is referred to as a

20   "trigger" in conjunction with the order. This trigger gives the end user

21   customer the ability to make and receive calls from other customers who are

22   served by the customer's host switch at the time of the LNP activation. This

23   ability is not dependent upon BellSouth working a disconnect order in the

24   central office switch. In other words, when a trigger is involved, an end user

1   customer can receive calls from other customers served by the same host

2   switch before the disconnect order is ever worked.

3

4   As it currently exists, Performance Measure P-11 does not recognize the

5   importance of triggers and their effect on the LNP process. Rather, the

6   current measure calculates the end time of the LNP activity as the processing

7   of the actual disconnect order in the host switch, even though, from a

8   customer's perspective, this activity is totally meaningless on most LNP

9   orders. It is the activation of the LNP and the routing function accomplished

10   by the LSMS that ultimately determines whether the end user is back in full

11   service and is able to make and receive calls when a trigger is used in porting

12   a telephone number. So, while BellSouth may be missing this measure, the

13   actual impact on CLECs and their end users, for a great majority of the orders

14   is minimal, or nonexistent.

15

16   BellSouth is pursuing a change in this measure that more accurately reflects

17   the LNP process and its impacts on end users.

18

19   **K. CHECKLIST ITEM 14 – RESALE**

20   BellSouth has met or exceeded the benchmarks/analogues for 82% of the

21   resale metrics for the month of May 2001. The details are delineated in

22   Attachment 1, Items A.1.1.1.1 through A.4.2.

23

24   **1. Resale Ordering Measures**

1   **FOC Timeliness**

2   For the month of May 2001, BellSouth processed approximately 9,972 Resale

3   LSRs in Kentucky and met the relevant benchmark on 99% of all FOCs. Of

4   the 9,972 LSRs, 8,842 were fully mechanized with 99% meeting the 3-hour

5   benchmark, clearly exceeding the 95% target.   See Attachment 1, Sections

6   A.1.9 through A.1.13 for further details.

7

8   **Reject Interval**

9   During the month of May 2001, there were 1,411 rejected LSRs, either

10   mechanically or manually processed, with 92% meeting the benchmark. The

11   benchmark for electronic rejects is 97% within 1 hour. 62% of all orders were

12   processed electronically, and 88% met the 1-hour benchmark.   See

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

14

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

16   benchmarks/analogues for May 2001 were:

17

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

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

20   The current benchmark for these two sub-metrics is >= 97% within one hour.

21   With the implementation of May data BellSouth was directed to change the

22   time stamp identification for the start and complete times of the interval for

23   this measurement from the Local Exchange Ordering (LEO) System to the

24   CLEC ordering interface system (TAG or EDI). With this change BellSouth

25   was unable to identify multiple issues of the same version of the LSRs that

1   may be rejected (fatal rejects), which should be excluded from the

2   measurement. If there are multiple issues of the same version, the measure

3   currently calculates the interval from the initial issue to the final issue of the

4   LSR returned to the CLEC, Reject or FOC.   Consequently, BellSouth's

5   performance level is inappropriately understated.   BellSouth is currently

6   working to determine a fix for this issue.

7

8   BellSouth is conducting a detailed root cause analysis of the process for

9   electronic rejects. This analysis addresses the ordering systems (EDI, TAG,

10   and LENS) used by the CLECs and the back-end legacy applications, such

11   as SOCS, that are accessed by the ordering systems.

12

13   Thus far, the analysis has determined that many of the LSRs that did not

14   meet the one-hour benchmark were issued between 11:00 p.m. and 4:30 a.m.

15   Between these hours the system is unable to process LSRs because of the

16   back-end legacy systems are out of service. Such hours should be excluded

17   from the measurement. BellSouth is currently reviewing the scheduled down

18   time for all systems and how that down time affects the ordering capability of

19   the CLECs.

20

21   <u>FOC Timeliness / ISDN / Manual (A.1.13.6)</u>

22   There were only four orders in this sub-metric for May 2001 with BellSouth

23   meeting the benchmark for three of them. Such a small universe does not

24   produce a statistically conclusive benchmark comparison.

25

1   FOC Reject & Response Completeness / Business / Mechanized (A.1.14.2)

2   FOC Reject & Response Completeness / Residence / Non Mechanized

3   (A.1.16.1)

4   FOC Reject & Response Completeness / Business / Non Mechanized

5   (A.1.16.2)

6   FOC Reject & Response Completeness / ISDN / Non Mechanized (A.1.16.6)

7   FOC Reject & Response Completeness (Multiple Responses) / Residence /

8   Partially Mechanized (A.1.18.1)

9   FOC Reject & Response Completeness (Multiple Responses) / Business /

10 Partially Mechanized (A.1.18.2)

11 FOC Reject & Response Completeness (Multiple Responses) / Residence /

12 Non Mechanized (A.1.19.1)

13 FOC Reject & Response Completeness (Multiple Responses) / Business /

14 Non Mechanized (A.1.19.2)

15 As indicated in Checklist Item 2, BellSouth has identified a coding issue for all

16 rejections coded as "auto clarification." This change, which was implemented

17 the end of May, will impact all FOC and Reject Completeness measures that

18 include auto clarification rejects.

19

20 **2. Resale Provisioning Measures**

21

22 For the month of May 2001, BellSouth met or exceeded the benchmark or

23 retail analogue for 86% of all resale provisioning measures. The details

24 supporting this percentage are delineated in Items A.2.1.1.1 through

25 A.2.20.6.2.2 of Attachment 1.

1

2   **<u>Order Completion Interval</u>**

3   As discussed Checklist Item 11, the failure to properly "L" code appropriate

4   orders and the missed appointments for customer reasons negatively impacts

5   the OCI measurements. The following are the measures for which BellSouth

6   did not meet the retail analogue in May 2001:

7

8   <u>Order Completion Interval / Residence / < 10 Circuits / Non-Dispatch</u>

9   <u>(A.2.1.1.1.2)</u>

10   The unadjusted order completion interval, as shown in Attachment 1, was

11   1.69 days compared to the retail analogue of 1.02 days. As explained in the

12   Order Completion Interval section for Checklist Item 11, BellSouth has

13   determined that non-dispatched orders were given the dispatched interval in

14   error. The mechanized software change to correct this problem was

15   implemented on June 2, 2001. BellSouth is currently evaluating the results of

16   this system modification.

17

18   <u>Order Completion Interval / Centrex / < 10 Circuits / Non-Dispatch</u>

19   <u>(A.2.1.5.1.2)</u>

20   There were only three orders in this sub-metric for May 2001. The small

21   universe for this measurement does not provide a statistically conclusive

22   comparison to the retail analogue.

23

24   Other resale provisioning sub-metrics for which BellSouth did not meet the

25   benchmark/retail analogue were:

1

2 <u>% Jeopardy Notice >= 48 hours / Business / Mechanized (A.2.9.2)</u>

3 The calculations for this measure have been determined to be incorrect.

4

5 <u>% Missed Installation Appointments / Design (Specials) / < 10 Circuits /</u>

6 <u>Dispatch (A.2.11.3.1.1)</u>

7 There was only one order in this sub-metric for May 2001. The small

8 universe for this measurement does not provide a statistically conclusive

9 comparison with the retail analogue.

10

11 <u>% Provisioning Troubles w/i 30 days / Centrex / < 10 Circuits / Non Dispatch</u>

12 <u>(A.2.12.5.1.2)</u>

13 There were only two orders in this sub-metric for May 2001. The small

14 universe for this measurement does not provide a statistically conclusive

15 comparison with the retail analogue.

16

17 <u>Average Completion Notice Interval / Residence / < 10 Circuits / Dispatch</u>

18 <u>Electronic (A.2.14.1.1.1)</u>

19 <u>Average Completion Notice Interval / Residence / < 10 Circuits / Non-</u>

20 <u>Dispatch Electronic (A.2.14.1.1.2)</u>

21 The root cause analysis of this measure indicated that the only differences

22 between the BellSouth retail and CLEC data are the mismatches found when

23 the orders are compared with the original LSRs. Any change to a name,

24 number of items, etc., occurring during the provisioning process will generate

25 inconsistencies with the original LSRs that must be resolved before a final

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1   completion notice can be sent. The start of the interval is the point at which

2   the technician completes the order and the interval ends when the completion

3   notice is sent. Any time to resolve these inconsistencies with the original

4   LSRs is included in the average. Because of numerous CLEC changes and

5   order updates, mismatches on CLEC orders exceed those for BellSouth retail

6   orders. Combining this with the smaller base for the CLECs' measurement

7   raises the average, which results in a miss.

8

9   <u>Service Order Accuracy / Business / < 10 Circuits / Dispatch (A.2.25.2.1.1)</u>

10   BellSouth met the standard for 39 of the 45 orders reviewed in this sub-metric

11   for May 2001. The 95% benchmark set a requirement of 43 based on the

12   quantity of orders for this sub-metric. BellSouth continues to focus on this

13   measurement.

14

15   BellSouth met all other UNE provisioning measures for the sub-metrics

16   included in this checklist item for May 2001.

17

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

19

20   BellSouth met the relevant retail analogues for 86% of all the Resale

21   Maintenance & Repair measurements in May 2001.

22   The sub-metrics for which BellSouth did not meet the retail analogues were:

23

24   <u>% Missed Repair Appointments / Business / Non Dispatch (A.3.1.2.2)</u>

1   BellSouth missed 11 of the 50 appointments scheduled for this sub-metric in

2   May 2001.   All eleven of the appointments were associated with one

3   customer's move to a new location that was scheduled as a non-dispatch

4   move.   Once the orders were completed, the customer reported problems

5   with all eleven lines. Resolution turned out to be a multitude of issues at the

6   premise location.

7

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

9   There were only 6 trouble reports for the 869 in service lines for this sub-

10   metric in May 2001. BellSouth provided over 99.3% trouble free service for

11   both retail and the CLECs for this sub-metric for the month of May. When

12   BellSouth provisions high quality service coupled with very large universe

13   sizes, it can cause an apparent out of equity condition from a quantitative

14   viewpoint.   In these cases, there is very little variation and the universe size

15   is so large that the Z-test becomes overly sensitive to any difference. In other

16   words, the statistical test shows that the measurement does not meet the

17   fixed critical value when compared with the retail analogue, but BellSouth's

18   actual performance for both CLECs and its own retail operations is at a very

19   high level – often 98% or 99%. From a practical point of view, the CLECs'

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

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

22

23   Customer Trouble Report Rate / PBX / Non Dispatch (A.3.2.4.2)

24   There were only 4 trouble reports for the 869 in service lines for this sub-

25   metric in May 2001. BellSouth provided over 99.5% trouble free service for

1   both retail and the CLECs for this sub-metric for the month of May. When

2   BellSouth provisions high quality service coupled with very large universe

3   sizes, it can cause an apparent out of equity condition from a quantitative

4   viewpoint.   In these cases, there is very little variation and the universe size

5   is so large that the Z-test becomes overly sensitive to any difference. In other

6   words, the statistical test shows that the measurement does not meet the

7   fixed critical value when compared with the retail analogue, but BellSouth's

8   actual performance for both CLECs and its own retail operations is at a very

9   high level – often 98% or 99%. From a practical point of view, the CLECs'

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

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

12

13 Maintenance Average Duration / Centrex / Non Dispatch (A.3.3.5.2)

14 There was only one trouble report for this sub-metric in May 2001. The small

15 universe for this measurement does not provide a statistically conclusive

16 comparison with the retail analogue.

17

18 % Repeat Troubles within 30 days / PBX / Dispatch (A.3.4.4.1)

19 There were only six trouble reports for this sub-metric in May 2001. The

20 small universe for this measurement does not provide a statistically

21 conclusive comparison with the retail analogue.

22

23 % Repeat Troubles within 30 days / PBX / Non Dispatch (A.3.4.4.2)

1   There were four trouble reports for this sub-metric in May 2001. The small

2   universe for this measurement does not provide a statistically conclusive

3   comparison with the retail analogue.

4

5   <u>% Repeat Troubles within 30 days / Centrex / Non Dispatch (A.3.4.5.2)</u>

6   There was only one trouble report for this sub-metric in May 2001. The small

7   universe for this measurement does not provide a statistically conclusive

8   comparison with the retail analogue.

9

10   **V.**   **<u>Summary</u>**

11

12   As stated in the Introduction to the Analysis of Performance Measurements

13   section, BellSouth met or exceeded the criteria for 414 of the 487 sub-metrics

14   (85%) for which there was CLEC activity in May 2001.

15