RESPONSE TO EXHIBIT KK-A

BellSouth Measurement	Business Rules, Exclusions, Calculations and Standards in Need of Immediate Change[1]
OSS-1. Average Response Time and Response Interval (Pre-Ordering)	Definition: The measurement time should begin when BellSouth receives the query from the CLEC and should end when BellSouth returns a response to the CLEC interface. BellSouth should be accountable for the period of time in which the query and its response are in its possession. Measuring a part of the process, as BellSouth does currently, provides inadequate and misleading information that does not reflect the CLEC experience or BellSouth's performance. The Commission should adopt a definition like that in the Texas plan which states: "The clock starts on the date/time when the request is received by SWBT, and the clock stops on the date/time when SWBT has completed the transmission of the response to the CLEC." Business Rules: (1) BellSouth should exclude syntactically incorrect queries from the measure. The query type measurements should show how long it takes to return valid query information that is useful to the CLEC. Responses to invalid queries could come more quickly than a response to a valid query, thus diluting the results in terms of how quickly CLECs receive the information sought through a syntactically correct query. (2) BellSouth should not be allowed to drag its feet in measuring new query types and new interfaces. It should agree to report on such new queries and interfaces within six to eight weeks after they go into production. BellSouth will be well aware of a new query or interface coming on line long before that interface or query type goes into production for CLECs, so the timeline proposed is more than generous. Disaggregation: BellSouth must capture all interfaces used, including PSIMS, and it must measure the speed of rejected queries and the number of queries receiving time outs to capture all preorder response time issues of concern to CLECs. Numerous time outs and slow rejects, as well as the speed of other query responses, can add up and cause a customers to become frustrated while the CLEC is trying to sign them up to new service. See Access Integrated Network's testimony
BellSouth's Position: The CLEC Coalition needs to review BellSouth's SQM filed in this docket. The time intervals start and stop at the appropriate places. "Syntactically" incorrect queries are, none-the-less, queries that impact the system. The CLECs would not propose that BellSouth exclude "syntactically" incorrect LSRs from reject reports. BellSouth does not "drag its feet" on measuring new queries or adding new systems. Each new system must be evaluated on its own merit relative to the amount of time required to develop a measurement. The CLEC Coalition should examine BellSouth's SQM for P/SIMS. It is there.	
OSS-2. Interface Availability (Pre-Ordering)	Data Retained: BellSouth should be required to post its own scheduled hours of OSS availability on its web-site as it currently

[1] Although some specific concerns about disaggregation and benchmarks are raised here, the full level of disaggregation and detailed information on analogs and benchmarks are described in KK-2 (disaggregation) and KK-3 (analogs and benchmarks).

	does for CLEC OSS availability. Parity of scheduled availability cannot be determined without this information. If CLECs do not know the starting point of this measure, the usefulness of the % schedule met is limited.
BellSouth's Position: This is a benchmark measurement with the objective being 99.5% of scheduled availability. Since this is a benchmark measurement and not an analog, the posting of retail OSS availability is absolutely irrelevant.	
OSS-3. Interface Availability (Maintenance & Repair)	Disaggregation: BellSouth needs to disaggregate by all its OSS Systems. If any route to that OSS varies, then each interface route should be reported separately. Data Retention: BellSouth should be required to post its own scheduled hours of OSS availability on its web-site as it currently does for CLEC OSS availability. Parity of scheduled availability cannot be determined without this information. Without such understanding of the starting point of this measure, the usefulness of the % schedule met is limited. BST also must not do system maintenance more often in CLEC prime operational hours: 5 to 9 p.m. versus its own prime hours: 9 to 5 p.m.
BellSouth's Position: As noted above, OSS availability is measured against a benchmark of 99.5%. Consequently, since this is a benchmark measure and not an analog measure, BellSouth's performance is irrelevant. Moreover, each OSS is reported separately, although particular routes for getting to the interface may not be. The point of this measurement, however, is to determine whether the interface itself is available, not whether a particular route is available.	
OP-1. Percent Flow-through Service Requests (Summary) OP-2. Percent Flow-through Service Requests (Detail) OP-3. Flow-through Error Analysis	Exclusions: BellSouth's SQM should not exclude orders that fall to manual, through no fault of the CLEC, from the metric. It may measure whether the orders it has designed to flow through actually do, but it should also show the whole story on what orders have not yet been designed to flow through. The purpose of this measure should be to measure the percent flow-through capability of BellSouth's ordering systems. CLECs cannot improve the flow-through of error free orders, only BellSouth can. Therefore, it should be held accountable for its decision not to provide flow-through. Further, BellSouth is obligated to provide parity service. As it has provided no evidence that such orders fall out for manual processing for its retail operation, it should not be allowed to exclude such orders from its flow-through calculation for CLECs.. In addition to the current level of discrimination, another consequence of allowing this exclusion is that BellSouth has no incentive, perhaps even a disincentive to improve its performance. Yet it is clear that the lack of flow-through causes additional delays, errors and costs. For example, FOC intervals are much longer for partially mechanized orders. It is also undisputed that having to re-key an order delays it and re-keying or otherwise manually handling an order increases the risk of error, which either causes the order to reject, creating more delay, or perhaps even to be provisioned incorrectly. CLECs request that the Commission reject this unjustified and discriminatory exclusion. At a minimum, the Commission should establish a timely sunset

	provision[2] on this exclusion to cause BellSouth to improve its flow-through performance. Fall out from errors occurring in SOCS should be included in the metrics, as should all fall out resulting from BST system issues. See Birch testimony. Additionally, BellSouth does not provide this report for LNP LSRs. Benchmark: BellSouth's benchmarks may be appropriate if total flow through is being measured, but if only orders designed to flow through as BellSouth currently proposes are counted then the benchmark should be a strict 98%. CLECs propose that both total and achieved/designed flow through performance should be measured. See Birch testimony.
BellSouth's Position: This issue has been argued repeatedly in other states such as Louisiana and Georgia. The FCC agrees that orders not designed to flow through for retail should not be assumed to flow through for CLECs. In a February 10, 1999 letter from Lawrence E. Strickling, Chief Common Carrier Bureau, FCC, Mr. Strickling stated that "in principle, complex orders that are manually processed for BellSouth's retail customers could be excluded from flow-through calculations." (Page 1, Section 1.) **However the proposed BellSouth SQM has an additional flow through metric that does not exclude orders designed for manual fallout. In BellSouth's SQM, this metric is referred to as "Percent Achieved Flow Through." Contrary to the CLECs' contention, BellSouth does have the incentive to program LSRs to flow through where the volume of the LSR type is sufficient.** **LNP Flow through is included in this report.** **BellSouth's benchmarks are appropriate for this measurement and are consistent with commission findings in Louisiana and Georgia.**	
OP-4 Percent Rejected Service Requests	Business Rules: BellSouth must identify all errors in orders in parallel, rather than catching and sending back each error one at a time. BellSouth's current serial process of rejecting orders extends the time for CLECs finally getting an order accepted. With BellSouth's long intervals for partially mechanized orders, repeated rejects can easily push out the due date for an order beyond the customer's toleration level. With numerous business rule changes and system update changes to learn, CLECs are apt to make mistakes. For them to quickly learn new rules a rapid rejection response catching all errors at once can speed up the CLEC's learning to avoid such errors in the future.
BellSouth's Position: The CLECs must submit properly formatted LSRs. Then this is not an issue. However, BellSouth mechanized OSS processes the LSR until an error is detected that prevents further processing and then rejects the LSR back to the CLEC for clarification. Certain fields on an LSR are interdependent such that multiple error checking is not possible. If the LSR falls out for manual handling, the LCSC Representative will clarify back to the CLEC all errors found in the review.	
OP-5. Reject Interval	Business Rules: BellSouth's business rules and formula should be changed to require BellSouth to calculate this measure as follows.

[2] See Appendix H of the New York Inter-Carrier Service Quality Guidelines which sets forth a schedule of activities required to improve flow-through.

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	The measured interval should end upon delivery by BellSouth of a response to the CLEC interface. BellSouth should measure the entire interval up to the point that it returns the rejected LSR to the CLEC. BellSouth should be accountable for the time in which the rejection is in its possession. The Texas plan states as the end of its interval "the time the reject notice is ***provided to EDI*** (or LEX) and is ***available*** to the CLEC." BellSouth's SQM indicates that it uses the date/time stamp in LEO for mechanized orders. CLECs request that it be required to use the date/time stamp from the interface (LENs/TAG/EDI) as it does for the beginning of the interval. There is no justification for stopping short of delivery to the CLEC. For non-mechanized orders, BellSouth indicates that it is using LON, its order tracking system for non-mechanized orders. Again, BellSouth provides no justification and the CLECs request that BellSouth be required to use the actual stop time from the fax server as it uses the date/time stamp from the fax for the receipt of the order. Further, when a CLEC uses multiple OSS interfaces the reject interval should be measured for each one. Different interfaces can produce different rejection intervals, and disaggregated monitoring of such differences are needed. Standard: BellSouth's intervals for partially mechanized orders are too long. Such rejections should be received in 5 hours not 48. Totally manual orders may have a longer, 24 hour, intervals. These intervals should include trunks. BellSouth's proposed trunk rejection intervals—4 days—are too long to wait to learn that its order had not even been initiated yet. See Birch testimony.
BellSouth's Position: The CLEC Coalition should review the SQM attached to Mr. Varner's Direct Testimony as AJV-1. The time stamps are started and stopped at the CLEC interface as requested. This point was argued in Georgia and this measurement is consistent with the Georgia Commission Order. The disaggregation proposed by the CLECs provides no additional meaningful information, particularly since the benchmarks are applicable to all interfaces used by the CLECs. The benchmarks are 1, 18, and 24 hours respectively with the Trunks benchmark being 4 days as stated and these time frames are reasonable. The time frames proposed by the CLECs are unreasonable and could not be achieved without adding additional employees.	

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OP-6. Firm Order Confirmation Timeliness	Business Rules: BellSouth's business rules and formula should be changed to require BellSouth to calculate this measure as follows: The measured interval should end upon delivery by BellSouth of a response to the CLEC interface. BellSouth should be accountable for the time in which the FOC is in its possession. and should be required to measure its performance as described in the Texas performance measures plan, which states "the end date and time is **recorded by** (both LEX and) **EDI** and reflect the actual date and time the FOC is **available** to the CLEC." BellSouth's SQM is unclear for this measure for mechanized orders and should be changed to clearly indicate that the end time is the date/time stamp in EDI/LENs/TAG.. For non-mechanized orders, BellSouth indicates that it is using LON, its order tracking system for non-mechanized orders. Again, BellSouth provides no justification and the CLECs request that BellSouth be required to use the actual stop time from the fax server as it uses the date/time stamp from the fax for the receipt of the order. Also, if CLECs order inbound BellSouth to CLEC trunks through ASRs, the confirmation of those ASRs should be included in this metric. CLECs also have proposed a separate measure to capture how quickly BellSouth responds to inbound trunk requests whether made through ASRs to which BellSouth sends a confirmation or by a Trunk Group Service Request to which BellSouth responds by sending an ASR. Either as part of the confirmation or a separate metric, measurement of the time it takes BellSouth to respond is critical to monitor. CLECs often wait long times for ILECs to send the ASRs when capacity is inadequate to carry calls from ILEC customers to CLEC customers. CLECs seek to have adequate inbound trunk capacity in place before adding new customers that would cause blocking for new and existing customers. Current trunking measurements do not capture this missing response time on inbound trunks. BellSouth also should confirm facilities availability for all orders, not just trunks, before issuing a confirmation. If CLECs cannot depend on the due date given them then confirmations are useless. Too often in BellSouth territory CLECs receive confirmations immediately followed by notice that the order is being held for facilities. Facilities checks should be a standard requirement for all orders. Disaggregation: BellSouth needs to disaggregate reporting by electronic, partially electronic and manual and by volume category if confirmation times differ by the size of the order. It also should disaggregate by any order activity (dispatch and non-dispatch, for example) that would be subject to different standard intervals for confirmations. Standards: While BellSouth and CLECs agree the interval for confirmation of fully mechanized or flow through orders,

	BellSouth has proposed extremely long intervals for confirming partially mechanized and trunk orders. BellSouth should establish intervals of five hours for partially mechanized orders, similar to the intervals agreed to by SBC's Pacific Bell and Ameritech affiliates. SWBT has a five hour confirmation interval for all electronic orders. Manual orders, including trunk orders should be confirmed in 24 hours. See Birch testimony.
BellSouth's Position: Again the CLEC Coalition should review BellSouth's SQM for start and stop times. These have changed since the CLECs originally made these comments. Measuring the stop time for non-mechanized orders at LON is an appropriate measuring point. There is little difference in this time and the time when the FOC is automatically sent to the fax server. The new Trunking measurements proposed by the CLECs are discussed in the rebuttal testimony of Mr. Varner. BellSouth does not check facilities on its retail orders prior to issuing a due date, to do so for the CLECs would discriminate against retail and add cost and time to the process. The CLEC can request a Service Inquiry on any order where the facilities are extraordinarily critical. The disaggregation proposed by the CLECs provides no additional meaningful information, particularly since the benchmarks are applicable to all interfaces used by the CLECs. The benchmarks proposed by BellSouth are consistent with Commission findings in BellSouth's region. The CLECs offer no rationale why the business rules, operations and practices of other regions such as SBC and Ameritech mean that the benchmarks supposedly adopted in those regions are appropriate in South Carolina.	
OP-7 Speed of Answer (Ordering Center)	Disaggregation: The reports should be by each help desk center the CLECs call into as each may have different answering times. Benchmark: The CLEC recommend a response time of 95% in 20 seconds and 100% in 30 seconds. In no case should the standard be worse than the state's end user standard for BellSouth's business and residence centers. These standards would require conversion of the metric to % in X seconds metric. If the Commission retains the measurement as an average, then the standards would need to be adjusted accordingly. CLECs need to get assistance from a representative quickly when calling with an ordering, provisioning or maintenance problem Often a single call will be about a problem holding up numerous, not just a single order from being completed..
BellSouth's Position: The CLECs do not place orders via the phone, as does retail. Since orders are placed electronically or by fax, the Ordering Center's speed of answer does not inhibit placing an order. BellSouth is obligated to answer the CLEC on average in the same time and manner it answers its retail customers. This measure adequately provides that information.	
OP-8 Mean Held Order Interval and Distribution Intervals	Exclusions: BellSouth must not be allowed to exclude cancelled orders from these metrics. Often this will make performance look

	better than it is as CLECs cancel orders when it appears that BellSouth will not have the facilities to fill those orders for months. Further, customers may request cancellations themselves if the CLEC cannot tell them how long they have to wait for their order to be completed. If cancelled orders are excluded, the metric will not show the real story of how often CLEC orders are held for facilities or other reasons. Disaggregation: CLECs need to see how many orders are held by all products, including the various xDSL-capable loops with and without conditioning, line-sharing and splitting requests, etc. The results should also be disaggregated by the reason for the hold: "facilities," "load," and "other" at the very least. See Covad Testimony
BellSouth's Position: This is a parity measure computed the same for CLECs and BellSouth retail. The Held Order Interval Measure reports orders held open (not completed) at the end of the report period. If an order's appointment is missed for BellSouth reasons but subsequently completed by the end of the report period, the order is reported as a BellSouth missed appointment in the Percent Missed Installation (PMI) report for that report period. In addition, the extended interval due to the BellSouth caused missed appointment is also captured in the Average Completion Interval (OCI). Facility delays are displayed on the report. If the CLEC wishes to investigate other types of reasons held, the data is available in its "raw" data file. As for the additional disaggregation proposed by the CLECs, this only adds to the approximate 330,000 measurements desired by the CLECs and adds little value.	
OP-9 Average Jeopardy Notice Interval Percentage of Orders Given Jeopardy Notices	Exclusions: Cancelled orders should not be excluded from the measure. CLECs need to see all the orders receiving jeopardies, particularly those that may lead to a cancellation if the delivery date is going to be missed. BellSouth should be required to remove its exclusion of orders submitted to BellSouth through non-mechanized methods. The Commission should not allow BellSouth to discriminate against CLECs who place orders via non-mechanized means. Information regarding jeopardy situations for non-mechanized orders is just as critical to the CLEC and its customers as it is for mechanized orders. Further, in some cases, for example, xDSL services and enhanced extended loops (EELs), CLECs have no choice but to use non-mechanized ordering. Finally, BellSouth provides this information for other status measures such as FOCs and rejection notices. The Commission should require BellSouth to provide jeopardy notices, regardless of the measns of ordering, and to report its performance accordingly. Business Rules: The elapsed time should continue through weekends and holidays to capture the full length of the notice interval. CLECs need to have an equivalent opportunity to plan with customers for situations where an order appears to be in jeopardy as does BellSouth. Therefore, if any BellSouth representative can check on the status of the order, then CLECs need access to that same information sent through electronic or manual notices as requested.

	Calculation: The calculation should be based on the orders placed in jeopardy not just those orders sent jeopardy notices. To calculate the metric as proposed by BellSouth would understate any problem in CLECs not receiving notices on orders that are going to be missed.
BellSouth's Position: Cancelled orders and non-mechanized orders are not excluded. Please refer to BellSouth's SQM. The elapsed time does include weekends and holidays and this does capture the full length of the notice interval. The CLECs <u>already</u> receive a notification that <u>retail does not receive</u>. Thus the CLECs already have more than an 'equivalent opportunity.' Many receive electronic notification. BellSouth retail must access a database to check status of an order to determine if it might be in jeopardy. The CLECs also have access to a database (C-SOTS) which is updated as status of orders change. The CLEC Coalition should refer to BellSouth's SQM for a closer look at the calculations. The Jeopardy Notice Interval uses number of orders given jeopardy notice while the Percent of Orders given Jeopardy Notices uses number of orders confirmed due in the reporting period.	
OP-10 Percent Missed Installation Appointments	Business Rules: Disconnect and From orders should be disaggregated and reported separately, rather than be excluded as BellSouth proposes. CLECs need to see that their requests to disconnect customers from service are timely as well. This will help avoid billing disputes with the terminated customer. This measure should be changed to include time, when time specific appointments are ordered by the CLEC. This measure should evaluate the level of service CLECs are paying for and to which BST is committing, i.e. if the appointment is time specific, the measurement should be time specific. The end time for xDSL orders should include successful continuity testing with the CLEC, particularly if the CLECs' proposed measure on acceptance testing is not adopted. See Mpower and Covad testimony. For CLECs, the interval should end with the issuance of the completion notice. This is when the CLEC knows that the order is complete and fulfillment information can be sent to the customer and billing started. For BellSouth, the completion time is the time entered into BellSouth's OSS Systems or any other database form which representatives can obtain completion information. Disaggregation: CLECs need to see how many orders are held by all products, including the various xDSL-capable loops with and without conditioning, line-sharing and splitting requests, etc. BellSouth's July 2000 SQM seems to make some movement in this direction, but only for Louisiana.

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BellSouth's Position: Disconnect and From orders are correctly excluded from this measure. D and F orders might skew the data masking the misses on inward orders. Time specific appointments related to hot cuts are captured by Measurement P-6A, Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval. **Cooperative Testing time intervals are included. While this is not an issue raised by the CLECs in this metric, BellSouth's definition of a successful test requires that the CLEC agree that the test was successful.** **The interval appropriately stops with the delivery of service. The interval for completion notices is included as a separate measurement.** **Regarding disaggregation, it appears that this comment belongs under Held Orders. Nevertheless, the disaggregation for Held Orders includes a specific category for xDSL loops. Further disaggregation is not meaningful.**	
OP-11. Average Completion Interval (OCI) Interval Distribution	Business Rules: Disconnect and From as well as expedite orders should be disaggregated and reported separately, rather than be excluded as BellSouth proposes. These usually are very short intervals that can skew total results, but CLECs need to know the speed at which disconnect and expedite orders are being met. BellSouth should be required to modify its business rules and calculation to reflect the appropriate interval. The appropriate starting point for this measure is when BellSouth receives a valid LSR and the appropriate ending point is when a completion notice is sent to the CLEC. Both the New York and Texas performance measures plans begins this interval with the date that a valid service request is received, not when the order is entered into the SOC system as proposed by BellSouth. BellSouth's approach eliminates what could be considerable time from the interval, particularly for non-flow through orders. BellSouth is in control of that time, not the CLEC, and should be accountable for it. Disaggregation: Orders designated "pending facilities" should be a level of disaggregation, as well as the other proposed levels of disaggregation in KK-C. CLECs need to see if BellSouth's orders designated as pending facilities get completed at a faster pace than CLEC orders that were pending facilities. CLECs need to see disaggregation by the various xDSL-capable loops, line-sharing and splitting requests, etc. As mentioned above, information on whether these products also include conditioning should be a level of disagregation. CLECs need to see if they are receiving line conditioning on orders in a non-discriminatory fashion. BellSouth's July 2000 SQM seems to make some movement toward better xDSL disaggregation, but only for Louisiana. BellSouth's July 2000 SQM seems to make some movement in this direction, but only for Louisiana.

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BellSouth's Position: Inclusion of D and F orders was considered and discarded by the Collaborative Group in Louisiana Workshops because of the possibility of masking more important inward orders. **The interval appropriately stops with the delivery of service. The additional interval for completion notices is included as a separate measurement. BellSouth's SQM has measurements which capture the entire experience for the CLEC customer at logical process points. The Reject Interval, FOC Interval, Order Completion Interval, and Completion Notice Interval reports capture every segment of the process. The Total Service Order Cycle Time (TSOCT) report captures the time requested by the CLECs. In a sense this is a disaggregation of the service delivery process.** **An order designated as pending facilities is, by definition, not completed and thus should not be in this measurement. However the completion interval for the order is extended if a lack of facilities caused a miss in the committed delivery date. Orders pending facilities are addressed by The Held Application report, Jeopardy Interval report.** **Disaggregation for xDSL: See above.**	
OP-12. Average Completion Notice Interval	Exclusions: BellSouth should be required to remove its exclusion of non-mechanized and partially mechanized orders. The Commission should not allow BellSouth to discriminate against CLECs who place orders via non-mechanized and partially mechanized means. Information regarding completion of service orders for non-mechanized and partially mechanized orders is just as critical to the CLEC and its customers as it is for fully mechanized orders. Further, in some cases, for example, xDSL services and enhanced extended loops (EELs), CLECs have no choice but to use non-mechanized ordering. Finally, BellSouth provides this information for other status measures such as confirmation and rejection notices. The Commission should require BellSouth to provide completion notices, regardless of the means of ordering, and to report its performance accordingly. Disconnections and From orders should be included in the measurement but reported separately to track performance, BellSouth should be required to modify its business rules and calculation formula to indicate the measured interval ends upon delivery by BellSouth of a notice of completion to the CLEC interface (LENS, EDI, or TAG) or, if manual, the date/time stamp from the fax machine or server. BellSouth should be accountable for the time in which the completion information is in its possession. BellSouth's current business rules have the ambiguous statement that "the end time is the time stamp the notice was submitted to the CLEC/BST system. CLECs request that the exact CLEC (not BST) system be identified as described above, so that, as in the Texas plan, the end interval measured is "the actual time (LEX) or ***EDI received*** the (SOC) notification and it is ***available*** to the client." Benchmark: Completion notices need to be delivered promptly

	after actual physical work completion so CLECs know when they own new customers and must respond to their needs. If the retail analog selected operates at the interval stated by BellSouth in collaboratives (an hour to an hour and a half) that is acceptable but most completion notices need to be delivered at least one hour after work completion.
BellSouth's Position: Again the CLEC Coalition needs to review BellSouth's SQM attached to Mr. Varner's Direct Testimony AJV-1. No such exclusions are in the SQM and the time stamps are in the correct place as requested by the CLECs. The CLECs are reminded, once again, that proactive notification of completion is a service provided to the CLECs and <u>not</u> to retail.	
OP-13 Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval	Exclusions: Cancelled orders should be included to capture all the hot cut activity (even those attempts that prompt the customer to cancel the order) in the metric. Business Rules: The CLECs request that this measurement be modified to include the entire hot cut interval or replaced with the hot cut timeliness measure requested by the CLECs in my direct testimony. It is important that not only the start time of the cut, but the entire interval, including acceptance testing with the CLEC be included in this measure. The loop should not be considered delivered until BellSouth and the CLEC have checked whether electrical continuity exists. Customers will not tolerate timely delivery of non-working loops. Disaggregation: Particularly with the advent of line sharing and splitting, disaggregation by all the types of digital and xDSL loops offered by BellSouth is critical to detect problem areas with hot cuts. Benchmarks: The interval for 1-10 lines should be 1 hour and for 11 or more lines 2 hours. BellSouth's interval represents a flawed calculation that does not depict the actual performance on each individual cut. In any event, BellSouth's 15 minutes per loop is excessive and even the CLEC's standard above is generous considering it should not take more than 5 minutes per loop for conversion. BellSouth's July 2000 SQM seems to make some movement in this direction, but only for Louisiana.
BellSouth's Position: Again BellSouth has no control over why a customer cancels an order. BellSouth has 4 Hot Cut measures that capture every aspect of the Hot Cut process. The disaggregations currently used in the SQM are appropriate. BellSouth cuts an SL1 or SL2 loop over to the CLEC switch, which the CLEC can use to provide any number of services. The benchmarks proposed by the CLECs could be appropriate in some circumstances, but if the lines were on IDLC for instance, one hour would not be sufficient to cut ten lines. Moreover, for cuts beyond ten lines there would have to be a graduated schedule which the CLECs have not proposed. For instance, 500 lines could not be cut in two hours. Absent such a scale, BellSouth's proposal makes more sense.	
OP-14 Percent Provisioning Troubles	Business Rules: The metric should include all trouble reports arising from the same order. A customer may experience several service disruptions related to provisioning problems and each should count as a provisioning trouble. Disaggregation: Disaggregation by trouble type and service type

	will help pick up problems described in Access Integrated Network's testimony regarding coordination of D & N orders.
BellSouth's Position: BellSouth's SQM counts the first trouble in this report. Subsequent troubles are counted in the Percent Repeat Troubles within 30 days report. It has been shown that the troubles related to the service order will be reported in the first few days after completion of the order. NY and TX use 7 and 10 days in this report and Louisiana has ordered 5 days. BellSouth's proposed window of 30 days after the service order is completed is extremely generous.	
OP-15 Total Service Order Cycle Time (TSOCT)	CLECs did not analyze this measure.
BellSouth's Position: This measure combines the intervals of FOC+OCI+ACNI to show the complete life cycle of a service request.	
MR-1 Missed Repair Appointments	Exclusions: BellSouth may exclude customer provided or CLEC equipment troubles from the metric but it should report the number of exclusions monthly. This will enable the CLEC to monitor whether the exclusions seem high and perhaps were wrongly coded. In New York and Pennsylvania, such exclusions are reported separately by Verizon. Business Rules: The end time should be when the CLEC receives notice that the service is restored . This will enable the CLEC to notify BellSouth promptly if it disagrees that the service has been restored.
BellSouth's Position: If the CLEC wants to analyze CPE troubles, it can use the Raw Data file for this report to isolate and evaluate troubles excluded for this reason from the report. Before the BellSouth technician completes the trouble, he/she must notify the end user and call the CLEC if a number is provided.	
MR-2 Customer Trouble Report Rate	See MR-1. Standard: The standard should be parity or no worse than the end user standard in Florida. Otherwise CLECs will not be able to meet the end user standard.
BellSouth's Position: The standard is parity.	
MR-3 Maintenance Average Duration	Exclusions: Customer and CLEC equipment troubles may be excluded but should be reported separately for the reasons stated in MR-1. BellSouth also should not exclude troubles that have lasted more than 10 days. There is no reason to exclude the longest or the shortest duration from this metric. Doing so only provides an inaccurate metric report. Business Rules: The trouble report should not be considered closed or service restored until the CLEC is given notice. "Restore" means to return to the normally expected operating parameters for the service and verification by the CLEC that the service has been restored. CLECs must be able to verify when informed that the trouble is closed that service has been restored to the customer. This will reduce the number of repeat trouble reports for services that were prematurely closed by BellSouth, but the CLEC customer's service is still impaired. Disaggregation: All maintenance metrics should be disaggregated by trouble type so CLECs can ascertain the specific types of problems (Central Office, Loop, etc.) where they may not be receiving parity service. This also protects BellSouth as dispatch troubles generally take longer than central office troubles and could make the metric look out of parity only because the CLEC

	had more dispatch troubles. So such disaggregation is particularly crucial for trouble duration.
BellSouth's Position: If the CLEC wants to analyze CPE troubles, it can use the Raw Data file for this report to isolate and evaluate troubles excluded for this reason from the report. The CLEC Coalition needs to review BellSouth's SQM AJV-1to Mr. Varner's Direct Testimony filed in this docket. Troubles exceeding 10 days are not excluded. As noted above the end user and CLEC are notified before the trouble is closed. Also as noted in the SQM these reports are disaggregated by dispatch vs. non-dispatch and by numerous products. For further discussion about disaggregation, see Rebuttal Testimony. There are 165 trouble types and disaggregation is this low of a level is simply not required to assess parity.	
MR-4 Percent Repeat Troubles in 30 Days	Business Rules: Customer and CLEC equipment trouble exclusions should be reported separately (See MR-1). Calculation: The denominator for the metric should be all repeat troubles received in the month, rather than all troubles closed. Using BellSouth's calculation could understate the problem for a month in which numerous troubles have not been closed by the end of the month. Standard: The standard should be parity or no worse than the state's end user standard. Otherwise the CLEC could not meet that standard.
BellSouth's Position: Please refer to BellSouth's response to MR-1 above. The calculation of this measurement is correct as stated in the SQM. It correctly calculates the percent of total troubles that were repeated during the month. Maintenance measures always use closed troubles. The CLEC proposal would, in fact, lead to understating of the problem because many of the "received" troubles would be excluded, this number would inflate the denominator. Troubles not closed this month, will be closed and counted in the next month. This is a parity measure that treats CLEC and BellSouth records the same and uses the appropriate analog for comparison.	
MR-5 Out of Service (OOS) > 24 hrs.	CLECs have no changes for this metric.
MR-6 Average Answer Time (Repair Center)	Disaggregation: If there is more than one maintenance center, then the results of both centers should be shown separately to monitor each center's performance. Standard: 95% calls should be answered in 20 seconds, and 100% in 30 seconds to ensure prompt taking of trouble reports. In no case, should the answer time be worse than the end user requirement.
BellSouth's Position: This is a parity measure that uses an analog for comparison. The CLEC answer time is compared to the BellSouth answer time by repair centers.	
BL-1. Invoice Accuracy	Invoice accuracy should not be based on adjustment dollars, as BellSouth is in control of whether or not it grants an adjustment, and is therefore in control of the outcomes of this measurement. CLECs request that the Commission order the additional billing measures in my direct testimony to address wholesale bill performance.
BellSouth's Position: BellSouth's SQM Billing measures are the appropriate measures to use. They have been approved in several states and are also used by other RBOCs.	
BL-2. Mean Time to Deliver Invoices	This measure should be modified to be based on percent invoices received on time, or the Commission should adopt the Percent On-Time Mechanized Local Service Invoice Delivery measure

	recommended by the CLECs.
BellSouth's Position: BellSouth's SQM Billing measures are the appropriate measures to use. They have been approved in several states and are also used by other RBOCs.	
BL-3 Usage Data Delivery Accuracy	Calculation: CLECs believe the metric should reflect the number of records not data packs delivered accurately. This is more in line with how accuracy has been calculated in the past for usage data..
BellSouth's Position: BellSouth's SQM Billing measures are the appropriate measures to use. They have been approved in several states and are also used by other RBOCs.	
BL-4 Usage Data Delivery Completeness	CLECs have no changes for this measure.
BL-5 Usage Data Delivery Timeliness	CLECs have no changes for this measure.
BL-6 Mean Time to Deliver Usage	Business Rule: CLECs believe that the measurement should begin with the generation of data by the CLEC retail customer or CLEC access customer (by the AMA recording equipment associated with the CLEC switch.). This will ensure that all usage (local and associated access) are covered by this metric.
BellSouth's Position: BellSouth's SQM Billing measures are the appropriate measures to use. They have been approved in several states and are also used by other RBOCs.	
OD-1 OS/DA Speed to Answer Performance/ Average Speed to Answer	Exclusions: BellSouth should not exclude call abandonment times. The customers likely abandoned the call because of lengthy waits for a response and such time should be included in the metric calculation. If the Commission adopts the CLEC's proposed new measure on call abandonment then this issue is moot. Standard: CLECs propose that 95% of calls be answered in 10 seconds. The metric would have to be changed from an average measure to a Percent in 10 Seconds to suit this benchmark. Otherwise the benchmark needs to be restates as an acceptable average. In no case, should the standard be worse than the end user standard for answering such calls, as the CLECs need to meet the end user standard.
BellSouth's Position: BellSouth's SQM OS/DA measures are the appropriate measures to use. They have been approved in several states and are also used by other RBOCs. The CLEC Coalition needs to review BellSouth's SQM Exhibit AJV-1 to Mr. Varner's Direct Testimony filed in this docket. The CLEC Coalition will note abandoned call time is counted in the measure. Finally, the CLECs are reminded, once again, that the Operator Services platform for OS and DA is the same for the CLECs' end users as well as BellSouth. It is parity by design of the network architecture.	
OD-2 OS/DA Speed to Answer Performance/Percent Answered in X Seconds	CLECs propose that OS/DA performance be measured with a single metric, but disaggregated for OS and DA.
BellSouth's Position: See above.	
E-1 E911 Timeliness E-2 E911 Accuracy E-3 E911 Mean Interval	CLECs have no changes to these measures but want third-parity verification of BellSouth's claims that its E911 update processes are parity by design.
BellSouth's Position: Like OS/DA these processes are parity by design.	
TG-1 Trunk Group Performance - Aggregate	Business Rules: CLECs are seeking the inclusion of 911 trunks in

	this measure along with the OS/DA trunks that BellSouth has agreed to add. Disaggregation: BellSouth must disaggregate reporting by trunk type and design type. Combining trunks built to different blocking standards can hide blocking problems. Calculation: BellSouth's July 2000 SQM appears to make some changes in the calculation of this metric that CLECs will need to obtain further clarification. These clarifications may raise additional issues regarding this metric. Standards: BellSouth's 0.5% buffer is not acceptable. The measure should be based on parity in not exceeding the various blocking design levels. See KK-3.
BellSouth's Position: E911 and OS/DA Trunks are common trunks over which the blocking experience of all customers will be equal. The CLEC Coalition needs to review BellSouth's SQM Exhibit AJV-1 to Al Varner's Direct Testimony filed in this docket. TGP-1 and TGP-2 provide a comparison of the blocking experience of CLEC and BST customers over their respective trunks sampled 24 hours a day.	
TG-2 Trunk Group Performance – CLEC Specific	See TG-1.
BellSouth's Position: E911 and OS/DA Trunks are common trunks over which the blocking experience of all customers will be equal. The CLEC Coalition needs to review BellSouth's SQM Exhibit AJV-1 to Al Varner's Direct Testimony filed in this docket. TG-1 and TG-2 provide a comparison of the blocking experience of CLEC and BST customers over their respective trunks sampled 24 hours a day.	
TG-3 Trunk Group Service Report	CLECs have no comment.
TG-4 Trunk Group Service Detail	CLECs have no comment.
CO-1 Collocation Average Response Time	Business Rules: Augments of existing collocation should be included in this metric. CLECs require timely responses when seeking to augment existing collocations as well to initiating new collocation construction. BellSouth's July 2000 SQM appears to be making some movement toward better collocation disaggregation, but it still is missing some key areas such as remote and adjunct collocation. Standards: CLECs agree to accept the intervals established in the Commission's separate collocation proceeding, including a definition of what CLEC changes would and would not stop the clock on measuring time intervals.
BellSouth's Position: Augments are included. BellSouth is willing to accept findings of the Commission in a collocation proceeding.	
C-2. Collocation Average Arrangement Time	Business Rules: BellSouth should not be permitted to remove permit time. BellSouth should be accountable for the intervals for which it is responsible for having work completed. Removing permit time removes any incentive for BellSouth to conduct parallel work activities or work with government agencies for expeditious issuance of permits. Neither the performance plan of New York or Texas provides for such exclusions.

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	Further, a collocation should not be considered complete until the CLEC accepts the collocation and associated cable assignment information is provided. This definition has been adopted in New York and other states in the Verizon region. Disaggregation: Disaggregation should be by each collocation type and by augment type (additions with intervals of 30 day, 45 day, 60 day, etc.). BellSouth's July 2000 SQM appears to be making some movement toward better collocation disaggregation, but it still is missing some key areas such as remote and adjunct collocations. Standards: See CO-1
BellSouth's Position: Permit time cannot be included as BellSouth is not responsible for handling this work. Once again the CLEC Coalition needs to review BellSouth's SQM Exhibit AJV-1 to Mr. Varner's Direct Testimony filed in this docket. The requested disaggregation is in the SQM.	
C-3 Collocation Percent Due Dates Missed	See CO-1 and CO-2

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NEW LNP[3] ISSUES REGARDING July 2000 SQM

OP-9 LNP Percent Rejected Service Requests	Exclusions: BellSouth should be required to remove the exclusion of non-mechanized LSRs. It provides this information for other types of services and should not be allowed to discriminate.
BellSouth's Position: The CLEC Coalition needs to review BellSouth's SQM. Manual LSRs are not excluded.	
OP-10 LNP Reject Interval Distribution and Average Reject Interval	See OP-9 above.
BellSouth's Position: Again manual orders are not excluded. The start and stop times are the same as for other rejects which is at the entry and exit points to the system (LENS, TAG, EDI, Fax Server).	
O-11 LNP Firm Order Confirmation Timeliness Interval Distribution and Firm Order Confirmation Average Interval	See OP-9. BellSouth's SQM does not specifically exclude, but it also does not specifically exclude non-mechanized LSRs.
BellSouth's Position: Manual LSRs are not excluded. The start and stop times are the same as for other FOCs which is at the entry and exit points to the system (LENS, TAG, EDI, Fax Server).	
OP-10 LNP Percent Missed Installation Appointments	Exclusions: The measure should be modified to include non-mechanized orders. The Commission should not allow BellSouth to discriminate against CLECs who place orders via non-mechanized means. Further, while some loop ordering is available to LENS users, LNP is not. BellSouth's performance for services ordered via non-mechanized means is obviously just as critical to the CLEC and its customers as it is for mechanized orders. Further, it is inconceivable that BellSouth can defend the exclusion of orders from a provisioning measure, such as missed appointments, simply based on how the service was ordered. The Commission should require BellSouth to capture performance data for all its measures, regardless of the means of ordering, and to report its performance accordingly.
BellSouth's Position: The CLEC Coalition needs to review BellSouth's SQM Exhibit AJV-1 to Mr. Varner's Direct Testimony filed in this docket. Manual LSRs are not excluded.	
OP-11 LNP – Average Disconnect Timelines Interval & Disconnect Timelines Interval Distribution	Business Rules: BellSouth should be required to actually perform the disconnect activity before completing the service order in SOCs. Exclusions: BellSouth should be required to include non-mechanized orders. See comments in measure above.
BellSouth's Position: This measure is designed to measure the exact time when the CLEC Customer's number has been disconnected from the BellSouth switch. The "D" or "C" order may be completed by the system at close of business that day hours after the work operation is complete. The CLEC Coalition needs to review BellSouth's SQM Exhibit AJV-1 to Mr. Varner's Direct Testimony filed in this docket. Manual LSRs are not excluded.	
OP-12 LNP - Total Service Order Cycle Time	Business Rules: See OP-11 above. Exclusions: See OP-9.
BellSouth's Position: This measure combines the intervals of FOC+OCI+ACNI to show the complete life cycle of a service request.	

[3] Other new issues are discussed in the proceeding document with the business rules, calculations, disaggregations, standards section as appropriate.

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