RESPONSE TO KK-B

Revised measure	Comments
PO-1 Loop: Loop Makeup – Response Time – Manual	BellSouth does not disaggregate by type of loop, and its proposed benchmark of 3 business days is more lenient than the CLEC proposed 72 hour interval.
BellSouth Position: BellSouth is confused by the point that Ms. Kinard is attempting to make here regarding disaggregation by type of loop. It is the CLEC's responsibility to determine from the loop makeup if the loop will support the type of service they wish to order or not and qualify the loop. Loop disaggregtion is irrelevant.	
PO-2: Loop Makeup - Response Time - Electronic	BellSouth proposes a benchmark of 90% in 5 minutes for now, with reassessment after 6 months. The Georgia Commission ordered a short-term benchmark of 90% within 5 minutes, and a benchmark after six months of 95% within 1 minute. At the least, this approach should be adopted. Better yet, the benchmark of 95% within 1 minute should be adopted immediately. Moreover, BellSouth should be required to provide this information (and meet this standard) via EDI as well as TAG.
BellSouth Position: The reason BellSouth proposed a benchmark of 90% in 5 minutes with reassessment after 6 months is because BellSouth is developing modifications to the back end OSS to enable faster response to electronic loop makeup requests. For the CLECs to expect BellSouth to modify this benchmark immediately is simply not reasonable. As with most benchmarks, the CLECs provide absolutely no rationale for suggesting that it be 95% within 1 minute immediately. Further, Loop Makeup – Response Time is a Pre-Ordering function. The CLECs are obviously not familiar with BellSouth's EDI system. EDI is not currently a Pre-Ordering system, and, therefore is not applicable in this measure.	
O-1: Acknowledgement Message Timeliness	The following BellSouth business rule needs to be clarified: "If more than one CLEC uses the same ordering center, an Acknowledgement Message will be returned to the `Aggregator', however, BellSouth will not be able to determine which specific CLEC this message represented." Obtaining individual results is vital to CLECs. This issue is especially critical as this measure is a proposed Tier 1 measure in BellSouth's

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	remedy plan. BellSouth proposes a benchmark of 90% within 30 minutes at first for EDI (moving to 95% within 30 minutes after six months) and 95% within 30 minutes for TAG. The benchmark should be 98% within 15 minutes for both EDI and TAG immediately. The CLEC intervals are generous in that the acknowledgement response is part of the transmission "handshake" and should normally be returned in seconds from receipt of an order.
BellSouth Position: The CLECs, in describing the acknowledgement response as a transmission 'handshake,' verifies that this action is a low level machine-to-machine communication. Therefore, if BellSouth receives a data packet containing requests from several CLECs, details of data packet content are not revealed at this point. This means that an acknowledgement is sent to the source of the request, the "Aggregator," not to the individual CLECs. However, the fact that the acknowledgement is a low level transmission process does not establish that a benchmark of 98% within 15 minutes is necessary versus BellSouth's proposal of 95% in 30 minutes. If CLEC specificity is truly 'vital to the CLEC' the CLEC itself should submit the LSR rather than using a third party.	
O-3 to O-6: Flow-Through Measures	Total flow-through and flow-through for orders designed to flow through should be measured separately. For orders designed to flow through, the benchmark for O-3 should be 98%.
BellSouth Position: Measurements O-3, Percent Flow-Through Service Requests (Summary), and O-4, Percent Flow-Through Service Requests (Detail), are disaggregated to reflect flow-through for residence, business, UNE and LNP levels. The different benchmarks for each of these classifications reflect the fact that a lesser or greater number of orders are designed to flow-through in each of these categories. It is to BellSouth's advantage to achieve the highest level of flow-through that is feasible on all types of orders, irrespective of source. There is no need to construct a 98% benchmark, for a separate metric called "orders designed to flow-through." Once again, the CLECs offer absolutely no rationale for suggesting a higher benchmark.	
O-8: Reject Interval O-9: Firm Order Confirmation Timeliness	BellSouth's proposed benchmarks remain inadequate for partially mechanized and non-mechanized orders. Benchmarks should be at least 95% in 5 hours for partially mechanized orders and 24 hours for non-mechanized orders. BellSouth should be required to do electronic facilities checks to ensure that the due dates delivered in FOCs can be relied upon.

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BellSouth Position: As with most benchmarks proposed by the CLECs, this one has no basis in fact. Partially mechanized and non-mechanized orders obviously require varying degrees of analysis work. BellSouth must determine whether a given LSR can be corrected by a Service Representative, in which case an order confirmation may be given subsequent to correction, or a rejection should be transmitted. The benchmark intervals proposed by BellSouth reflect the fact that a need for human intervention suggests a basis for a much more liberal standard for processing time than a computer based response. It is not appropriate to set excessively stringent time-based thresholds for what is either fully or substantially a manual process.	
O-10: Service Inquiry With LSR Firm Order Confirmation (FOC) Response Time Manual	The benchmark for this metric should combine the interval for Manual Loop Qualification with the appropriate FOC interval. At most, the benchmark should be 95% in 3 days for electronic orders and 4 days for manual orders.
BellSouth Position: This measurement combines loop qualification with FOC. Once again, the CLECs' proposed benchmark is arbitrary and baseless.	
O-11: Firm Order Confirmation and Reject Response Completeness	BellSouth should include partially and non-mechanized orders.
BellSouth Position: This measurement already includes Firm Order Confirmation and Reject Responses for partially mechanized orders and the measurement will be modified to include manual orders with the May data, reported in June.	
O-12: Speed of Answer in Ordering Center	This metric should not be diagnostic. The benchmark should be 95% in 20 seconds and 100% in 30 seconds.
BellSouth 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. The benchmark proposed by the CLECs are arbitrary.	
O-13: LNP-Percent Rejected Service Requests	BellSouth has added manual LNP orders to its metric, which resolves one of the outstanding issues.
BellSouth Position: No response is required**.**	
O-14: LNP-Reject Interval Distribution & Average Reject Interval	BellSouth has added manual LNP orders to its metric, which resolves one of the outstanding issues.

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BellSouth Position: No response is required**.**	
0-15: LNP – Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval	Non-mechanized should be developed quickly and CLECs' proposed intervals for FOCs should be applied.
BellSouth Position: The CLECs' proposed intervals are baseless and arbitrary.	
P-4: Average Completion Interval	BellSouth's proposed intervals for xDSL with and without conditioning are too long. Interval for conditioning should be no more than 5 days.
BellSouth Position: BellSouth maintains its position that the proposed intervals of 7 days for UNE xDSL without conditioning and 14 days for UNE xDSL requiring conditioning are reasonable. The CLEC position that the intervals are too long is unsubstantiated**.**	
P-6A: Coordinated Customer Conversions -- Hot Cut Timeliness % Within Interval and Average Interval	Metric should be clarified to make clear that an early cut would be included as a missed appointment if cut was restarted within original window. Thirty minute buffer is excessive. Different intervals for IDLC are inappropriate and unjustified. The benchmark should be 95% completed within cutover window. BellSouth only appears to be measuring whether the cut started on time, but does not measure whether it finished within the cutover window proposed by the CLECs.
BellSouth Position: A 15 minute interval on either side (plus or minus) of a scheduled cut time is clearly reasonable for this type of activity. Efforts such as these require some level of flexibility in establishing a window of cutover start times. If a cutover involves IDLC, the interval should be longer to account for the additional work content that is included. The benchmark for this measurement is 95% within the proposed window. Windows for non-IDLC and IDLC cutovers appropriately differ. It is not reasonable for a cutover that begins within the specified window to be considered a missed appointment as suggested by the CLECs. Measurement P-6 (Coordinated Customer Conversions Interval) reflects the time it takes to complete the coordinated cutover effort**.**	
P6-B: Coordinated Customer Conversions – Average Recovery Time	Only verified end user and CLEC caused reasons should be excluded. (i.e., the CLEC has to agree). Outages during and before the cut are included, not just those that can be reported after order completion through maintenance systems. BellSouth may separate out the later group of restorals and measure them as a disaggregation of Maintenance Average Duration with the same benchmark if it prefers.

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	The benchmark should be 98% in 1 hour and 100% in 2 hours. These outages were caused by BellSouth's cut-over errors and, thus, should be easy for it to diagnose and resolve.
BellSouth Position: BellSouth is confused about the statement 'outages …before the cut are included.' These are typically included in Maintenance Average Duration. This is yet another attempt by the CLECs to change measurements apparently with the sole purpose of delay. CLEC and end-user caused reasons are appropriately excluded. BellSouth does work with CLECs to correctly identify the cause of an outage occurring prior to completion. This requires that the CLEC involved does not unreasonably withhold agreement with the determination that the outage was caused by the CLEC or end-user. Establishing a benchmark of 98% within 1 hour at this time is arbitrary.	
P-6C: Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order	The benchmark should be 1%, not 5 % as BellSouth proposes.
BellSouth Position: The arbitrary benchmark proposed by the CLECs is also inappropriate. The expected volume for a specific CLEC during any given time period may be limited. Small volumes would cause benchmark misses at a frequency level that does not represent the true level of service provided. The 5% benchmark proposed by BellSouth is more than adequate**.**	
P-7: Cooperative Acceptance Testing - % of xDSL Loops Tested	BellSouth should report the number of exclusions (CLEC caused failures monthly) so CLECs can determine whether their reports do not match up. The benchmark should be 99.5%.
BellSouth Position: The CLECs' arbitrary standard of 99.5% is well beyond a parity-based requirement. BellSouth proposes a benchmark of 95% of the lines tested. While this is not an issue raised by the CLECs, BellSouth's definition of a successful test requires that the CLEC agree that the test was successful.	
M&R-3: Maintenance Average Duration	BellSouth should clarify what it means by a "correct" repair request and how a CLEC is informed that reporting of trouble is incorrect.

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BellSouth Position: A correct repair request is provided in the format specified by BellSouth to properly identify the type of trouble. The CLEC is informed if the trouble report is not correct at the time it is submitted.	
M&R-6: Average Time - Repair Centers	Benchmark should be the better of parity or at least the end user standard
BellSouth Position: This measurement is not identified as parity by design, however the processes are the same. Either a CLEC representative or a BellSouth customer makes a choice on the Repair Center's menu identifying a trouble. The request is then placed in queue. For CLECs, the average answer time in the UNE Center and the BRMC are comparable to the average answer time in the BellSouth Repair Centers.	
M&R-7: Mean Time to Notify CLEC of Network Outages	Parity by design needs to be confirmed by KPMG. If confirmed, no metric is needed, just information on how to get the same notices at the same time as BellSouth.
BellSouth Position: BellSouth's Network Management Center (NMC) electronically sends notification, to both CLECs and appropriate BellSouth personnel, of a customer impacting network incident. Since the notice is sent through the same medium and at the same time to both CLEC and BellSouth personnel, the process is parity by design.	
B-2: Mean Time to Deliver Invoices	Bills rejected because of BellSouth formatting or content errors should be included.
BellSouth Position: The CLECs' position here is simply not clear. The Mean Time to Deliver Invoices should only be based on the time it takes to deliver correct invoices. If the invoice contains formatting or content errors, this fact is identified in measurement B-1 (Invoice Accuracy). This design allows the measurements to capture distinct aspects of the billing process**.**	
D-1: Average Database Update Interval	Parity by design needs to be confirmed by KPMG.
BellSouth Position: The database (LIDB) update process begins when a service order is completed. All the downstream activities are procedurally the same for both BellSouth and CLEC orders. Therefore, this measurement is appropriately identified as parity by design.	
D-3: Percent NXXs and LRNs Loaded by LERG Effective Date	BellSouth's business rules should not define the interval by the completion of initial interconnection trunk groups when that happens after the LERG effective date. Otherwise, BellSouth could delay delivery of trunks to cover late LERG updates. The LERG effective date should be the end time in all cases.

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BellSouth Position: The benchmark for this measurement is 100% by the LERG effective date. However, an exclusion is identified for situations where the CLEC interconnection trunks are not in place by that date due to the fact that the CLECs have not completed their work. The CLECs' delay is the reason for this exclusion. If the delay is caused by BellSouth, this occurrence would reflect a missed objective. There is no incentive for BellSouth to delay trunk delivery, since this action would show up as a benchmark miss and an increase in Trunk blockage.	
CM-2: Change Management Notice Average Delay Days	Benchmark should be 95% in 5 days. For 30 days it should be a shorter delay day interval of no more than 3 days.
BellSouth Position: Measurement CM-1 (Timeliness of Change Management Notices), establishes a standard of 30 days or greater notice to CLECs informing them of required software release dates. A benchmark of 95 % greater than or equal to 30 days is set. This is the primary measurement. If this primary threshold is missed, the secondary consideration is the average delay encountered. Since the 30 day minimum notice is missed the problem is identified. The CM-1 measure is identified as a Tier II penalty measurement and encourages BellSouth to provide timely notices. It is reasonable to establish a benchmark of 90% ≤ 8 days for CM-2, the average number of delay days.	
CM-3: Timeliness of Documents Associated with Change	BellSouth's proposed exclusion for dates that slip less than 30 days "for reasons outside BellSouth control" is too broad. A Five day interval for documentation changes is too short for CLECs to be able to implement changes. CLECs recommend 30 days for documentation changes, unless it is for error correction, which should be provided within the five day timeframe. Further, if the documentation is associated with software changes, 90 days or more is needed for major releases.
BellSouth Position: The exclusion "for reasons outside BellSouth control," gives examples "such as changes due to Regulatory mandate or [CLEC] request" to describe the types of events that would be excluded. This exclusion is not too broad if read in light of the examples given. BellSouth establishes an objective of a 30 day minimum interval with a 95% or greater occurrence for releases requiring new features coding. This is the same interval as that given for notice of software releases (CM-1). The CLEC proposal of providing documentation 90 days or more in advance for major releases would require a longer interval for providing documentation of releases than the interval for providing notice of the change. A 5 day threshold is recommended for providing documentation associated with defects, corrections or clarifications. The CLECs discussion acknowledges that a 5 day interval is sufficient for error correction**.**	
CM-4: Change	Benchmark should be 98% in 5 days.

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Management Documentation Average Delay Days	
BellSouth Position: The same argument applies here as that given in support of a benchmark level of 90% less than or equal to 8 days for measurement CM-2 (Change Management Notice Average Delay Days).	
CM-5: Notification of CLEC Interface Outages	BellSouth should explain how it verifies outage and the interval between first notice of outage and verification. If this interval is long, the notice could be delayed and still appear to be on time because of "verification" condition.
BellSouth Position: Before informing CLECs of an interface outage, BellSouth must be reasonably certain that an actual outage exists**.**	

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