

OSS-76

Exhibit to the Rebuttal Testimony of Ron Pate
Public Service Commission of Kentucky
Case No. 2001-105
JULY 30, 2001

KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400

WASHINGTON, D.C. 20036-3209

(202) 326-7900

FACSIMILE:
(202) 326-7999

MICHAEL K. KELLOGG
PETER W. HUBER
MARK C. HANSEN
K. CHRIS TODD
MARK L. EVANS
STEVEN F. BENZ

NEIL M. GORSUCH
GEOFFREY M. KLINEBERG
REID M. FIGEL
HENK BRANDS
SEAN A. LEV
COURTNEY SIMMONS ELWOOD
EVAN T. LEO

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Ex Parte Presentation

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

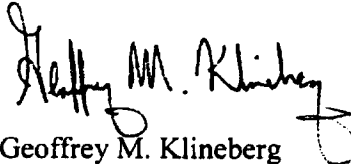
*Re: Joint Application by Southwestern Bell for Provision of In-Region,
InterLATA Services in Kansas and Oklahoma, CC Docket No. 00-217*

Dear Ms. Salas:

On behalf of Southwestern Bell Telephone Company ("Southwestern Bell"), I am enclosing for filing in the above-referenced proceeding the affidavit of Michael Kelly of Ernst & Young. This affidavit and supporting materials were prepared by Ernst & Young at the request of Southwestern Bell to describe the scope of the approach utilized in preparing its attestation examination report on management's assertion that Southwestern Bell used the same operations support systems throughout Southwestern Bell's five-state operating region. The specific work papers that Ernst & Young prepared in the course of its review are proprietary and have not been attached to Mr. Kelly's affidavit.

Consistent with Rule 1.1206(b)(1), I am submitting two copies of the enclosed document. Thank you for your assistance in this matter.

Sincerely,


Geoffrey M. Klineberg

Enclosure

cc: Mr. Stanley
ITS

AFFIDAVIT OF MICHAEL KELLY

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS)

Before me, the undersigned authority, personally appeared Michael Kelly who, being duly sworn, did hereby state as follows:

1. My name is Michael Kelly. I have over 13 years of industry experience in the information technology audit and assurance industry, the last nine of which have been at Ernst & Young (E&Y). I currently hold the position of Partner within our Information Systems Assurance and Advisory Services practice. In that position, my responsibilities include providing technical leadership and direction principally to clients within the telecommunications industry throughout the United States and internationally.
2. I supervised and coordinated our work on the attestation examination relative to Southwestern Bell Telephone Company's (SWBT) assertion that SWBT used the same Operational Support Systems (OSS) throughout the five-state operating region. All fieldwork on this attestation examination was performed by E&Y employees at the manager level or above with previous experience working on systems of similar magnitude within the telecommunications industry.
3. To further support the conclusions reached in the attestation examination relative to management's assertion that SWBT used the same OSS throughout the five-state

operating region, E&Y built upon previous work performed over the course of the last year. All told, E&Y has performed three attestation examinations and one agreed-upon procedures engagement involving testing of SBC Communications Inc.'s (SBC) performance measurements and OSS systems. E&Y has spent in excess of 16,000 hours in the year 2000 evaluating SBC's performance measurements and OSS, approximately 12,000 of which have been incurred at SWBT.

4. The attestation examinations and agreed-upon procedures engagement discussed below were conducted in accordance with the attestation standards established by the American Institute of Certified Public Accountants (AICPA). An attestation examination is one in which a practitioner is engaged to issue or does issue written communication that expresses a conclusion about the reliability of a written assertion that is the responsibility of another party. Notably, an attestation examination is the highest level of assurance that can be provided on a written assertion under these standards. An agreed-upon procedures engagement is conducted according to these same standards, subject to agreement by the parties regarding the procedures in question.
5. The attestation examinations and agreed-upon procedures engagement performed by E&Y relating to SWBT's performance measurements and OSS systems are described below:
6. **Five-State SWBT OSS Attestation Examination.** At the request of SWBT, E&Y tested management's assertion that SWBT utilized the same operational support systems throughout the SWBT five-state operating region to support CLEC activity.

Appendix 1 to Attachment A to this affidavit is the final report on management's assertion that was issued on October 24, 2000 and filed with the FCC on October 26, 2000 as part of SWBT's Kansas/Oklahoma 271 Application. In that report, E&Y concluded management's assertion that, as of June 30, 2000, SWBT utilized the same OSS throughout the five-state operating region to support CLEC activity, is fairly stated in all material respects. Attachment A to this affidavit summarizes the work done by E&Y on this attestation examination, including the methodologies utilized and criteria applied by E&Y in reaching its opinion that SWBT's assertion was fairly stated in all material respects.

7. E&Y's Five State SWBT OSS Attestation Examination utilized knowledge and experience gathered by E&Y in performing related engagements for the Missouri Public Service Commission.
8. **Missouri Public Service Commission (MoPSC) Performance Measurement Attestation Examination.** At the request of MoPSC, E&Y attested to the accuracy and completeness of SWBT's performance measures in Missouri for the months of April through June 2000. Appendix 2 to Attachment A to this affidavit is E&Y's final report, including exceptions, dated November 1, 2000.
9. **Missouri Public Service Commission OSS Capacity Agreed-Upon Procedures Engagement.** At the request of the MoPSC, E&Y also performed an agreed-upon procedures engagement to assist the MoPSC in determining whether the Telcordia OSS test was sufficient to ensure the ability of SWBT's OSS systems to handle

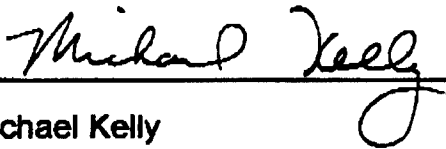
commercial volumes of Missouri transactions. Appendix 3 to Attachment A to this affidavit is the final report on this engagement issued on November 1, 2000.

10. Appendix 4 to attachment A to this affidavit outline the procedures utilized by E&Y in performing the agreed-upon procedures engagement designed to assist the MoPSC in evaluating SWBT's OSS capacity, as well as the methodology utilized for the Missouri PM attestation examination. Appendix 5 to Attachment A is the transcript of the portion of the November 8, 2000 MoPSC hearing where this presentation was made.

11. **FCC Merger Compliance Attestation Examination.** E&Y tested 36 of SWBT's performance measurements for the period October 1, 1999 through December 31, 1999 as part of an overall engagement to attest to SBC's compliance with the FCC's SBC/Ameritech Merger Conditions. The final report on the FCC Merger Compliance Attestation Examination, including exceptions, has been previously filed with the FCC.

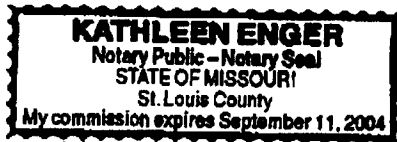
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 1, 2000.



Michael Kelly
Partner, Ernst & Young

Subscribed and sworn to before me this 1st day of December 2000.



Kathleen Enger
12-1-00

Southwestern Bell Telephone Company

**Five State Regional OSS Attestation Examination Scope
and Approach**

Supplement to the Report Issued October 24, 2000

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Background

In response to a request by the Federal Communications Commission (FCC) to verify that Southwestern Bell Telephone Company's (SWBT) pre-order and order (DataGate, Verigate, EASE, EDI, LASR, SORD, and LEX) Operational Support Systems (OSS) are the same throughout the five state operating region (Arkansas, Kansas, Missouri, Oklahoma, and Texas), SWBT engaged Ernst & Young (E&Y) to examine and issue an attestation report of SWBT management's assertion that the same OSS are used throughout the SWBT five state operating region to support competing local exchange carrier (CLEC) activity.

To perform this assignment, E&Y built upon knowledge previously gained from engagements performed on behalf of the MoPSC regarding SWBT's OSS Capacity and Performance Measures (refer to Appendix 2, MoPSC Performance Measurement Attestation Examination, Appendix 3: MoPSC OSS Agreed-Upon Procedures Report to Assist in the Evaluation of SWBT's OSS Capacity in Missouri, Appendix 4: MoPSC Scope and Approach Presentation, and Appendix 5: MoPSC Transcript of November 8, 2000 Scope and Approach Presentation) as well as work performed on behalf of the FCC to verify the accuracy and completeness of performance measures as part of the attestation examination of SBC's compliance with the merger conditions resulting from the FCC's approval of SBC's merger with Ameritech Corporation.

Pre-Order and Order OSS Covered by E&Y Attestation Examination

E&Y's attestation examination report on management's assertion that SWBT uses the same OSS throughout the five state operating region is included as Appendix 1. The specific OSS to which the attestation opinion applies are referenced in management's assertion and are repeated below.

| | | |
|--------------------------------------|----------|---|
| DataGate | DataGate | Datagate is an application-to-application interface that allows SWBT and CLEC software programs or applications to exchange information. DataGate provides CLECs with the ability to acquire pre-order information from a single, real time interface, by accessing a set of libraries or programs within SWBT backend legacy OSS. |
| Easy Access Sales Environment | EASE | EASE is an on-line service order negotiation tool used by SWBT's own retail service representatives and is available to CLECs providing resale services for both residence and business customers. Consumer EASE application is used by SWBT and CLECs for pre-ordering and ordering functions for customers with 5 lines or fewer. Business EASE is used for pre-ordering and ordering for customers with 30 lines or fewer. |
| Electronic Data Interchange Services | EDI | EDI acts as an electronic interface between CLEC's and SWBT. EDI translates between the industry |

| | | |
|--|----------|---|
| | | standard formats for ordering and proprietary SWBT back office formats. EDI Gateway supports ordering and provisioning of both resale and UNEs (Unbundled Network Elements). It allows CLECs to submit LSRs (Local Service Requests) to SWBT, and receive acknowledgments, confirmations, and completion statuses while utilizing the EDI interface. |
| LSR Exchange System | LEX | LEX is a GUI (Graphical User Interface) developed by SWBT for CLECs that enables them to perform on-line wholesale ordering. To access LEX, the CLEC must have the SWBT Toolbar client application on their PC, as well as a valid Toolbar ID. |
| Verification Gateway | Verigate | Verigate provides CLECs access to the pre-order functionality provided by DataGate through a GUI interface launched from the Toolbar client application that resides on the CLEC's PC. |
| Local Access Service Request System | LASR | LASR is an application which receives LSRs submitted electronically by CLECs via LEX or EDI (ordering systems). LSRs are stored within a database in LASR, and edit checks are performed on the LSR information for MOG eligibility. |
| Service Order Retrieval and Distribution | SORD | SORD is a mechanized, on-line service order processing system for SWBT. It provides means to create, store, edit, maintain, and distribute requests to other involved work groups and systems for establishing, disconnecting, or changing a customer's services. SORD is used for processing retail and wholesale service orders into SWBT's backend legacy systems. |

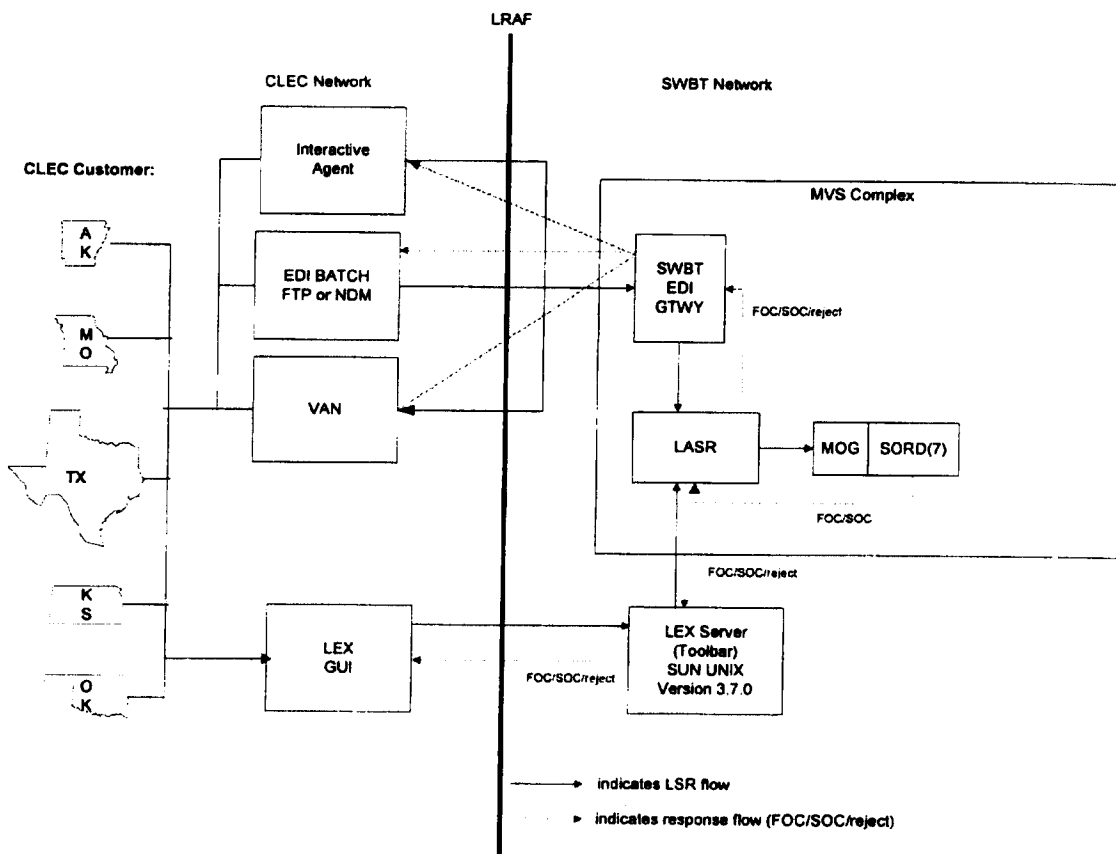
Criteria Utilized to Determine SWBT OSS Are the Same for the Five State Region

SWBT and E&Y used the following criteria to determine that the SWBT OSS applications were the same throughout the five-state region:

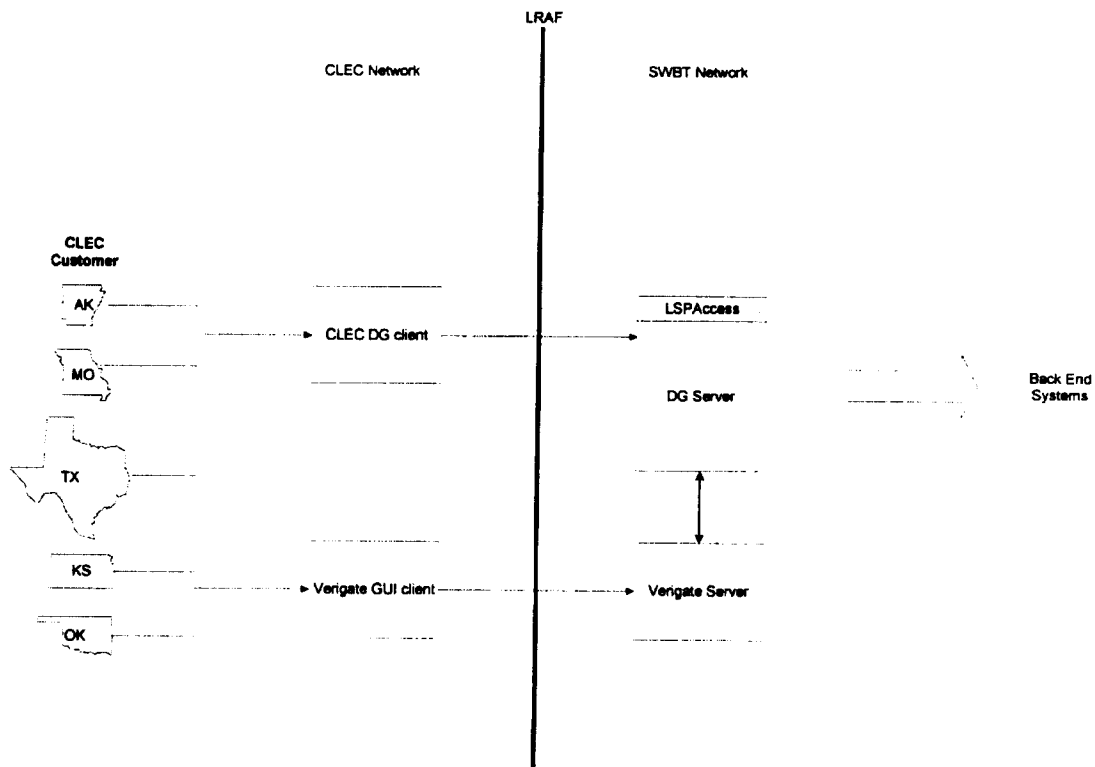
1. Pre-order and order applications (DataGate, Verigate, EASE, EDI, LASR, SORD and LEX) are utilizing the same programming code (logic) within each application throughout the five state operating region.
2. Pre-order and order transactions from each of the five states are processed through the same pre-order and order applications.
3. Pre-order and order applications are designed to provide the same functionality regardless of which state an end user served by a CLEC resides.
4. Supporting documentation (i.e., user manuals) for pre-order and order applications is the same regardless of the state in which the CLEC's end user resides.

CLEC Connection to SWBT Overview

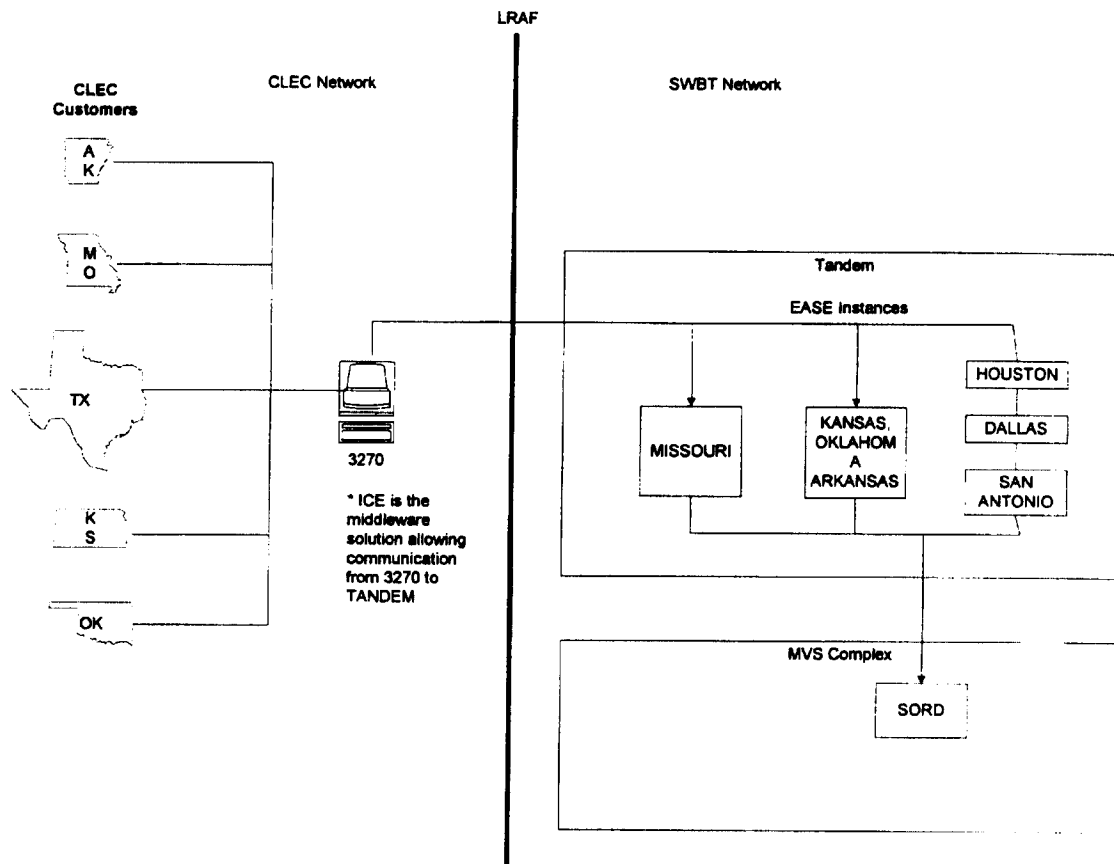
LEX / EDI Order Diagram:



Verigate / DataGate Pre-order Diagram:



EASE Order Diagram:



Objectives and Procedures

To determine if the same OSS is used throughout the SWBT five-state operating region to support CLEC pre-order and order activity, the design of SWBT's OSS was evaluated by performing the following procedures:

1. Documented in a narrative and flow chart format how each pre-order and order application is utilized by CLECs and how transactions are processed through each of the applications (refer to high-level pre-order and order application descriptions below).
2. Documented the process by which CLECs obtain access to the SWBT pre-order and order applications to determine how and where CLEC transactions enter SWBT OSS.
 - a. Reviewed how CLECs are granted access to the LRAF (LSP Remote Access Facility) (see additional access authorization description below).
 - b. Determined CLECs are authorized for access to the LRAF and verified that all CLEC automated pre-order and order transactions enter SWBT OSS via the LRAF (with the exception of VAN transactions).
3. Reviewed the technical architecture of pre-order and order applications utilized by the CLECs within the five-state region.
 - a. Read the findings identified in the MoPSC agreed-upon procedures report.
 - b. Identified which SWBT pre-order and order applications are running multiple versions and/or instances of the application code. Additionally, identified the platforms running these applications to ensure all instances were subjected to the review.
4. Performed testing to validate the consistency of the pre-order and order process for the five state region.
 - a. Obtained the Local Service Pre-order Requirements (LSPOR) and Local Service Order Requirements (LSOR), LEX User Guide, EASE User Guide, Toolbar User Guide, Verigate User Guide, and DataGate User Guide provided to CLECs and reviewed the documents to determine if pre-order and order instructions are regional in nature.
 - b. Selected two CLECs serving end users in multiple states in the SWBT five state region and tested a sample of orders for each CLEC to determine the format, content, and processing of the orders were the same across the states.
 - c. Reviewed the CLEC set-up process to validate how CLEC orders are directed through the LRAF to SWBT OSS.
5. Tested the code for pre-order and order applications to determine whether the application was designed to function the same across the SWBT five state region.
 - a. Obtained and reviewed the application library code listing for SORD, EASE, EDI and LASR and verified that the objects for each instance are the same. Additionally, for Verigate, DataGate and LEX, E&Y reviewed SWBT's proprietary versioning tool to ensure multiple instances are running the same version of pre-order and order applications.
 - b. Reviewed versioning differences for DataGate in order to verify that multiple versions of the application code are not CLEC specific or state specific. In

addition, we reviewed SWBT versioning procedures and controls for distribution of OSS software to multiple instances.

- c. Reviewed CLEC communication procedures for DataGate versions including the accessible letters to CLECs and change management procedures to place an application change into production (April – October 2000).
- d. Reviewed listing of pre-order and order application changes from June 30, 2000 through the date of our report (October 24, 2000) to determine that any changes did not impact our conclusion on management's assertion that SWBT uses the same OSS throughout the five state operating region.

OSS Application Descriptions

In order to gain an understanding of SWBT's pre-order and order applications, a process analysis was performed. This analysis is documented in narrative form below.

Access to SWBT Pre-order and Order Applications

To obtain access to SWBT's internal pre-order and order applications, a CLEC must either dial-in via modem or have a direct connection to the LRAF. CLECs are assigned a static IP address; user ID and password to ensure that only authorized users are able to obtain access to SWBT internal pre-order and order applications. Once a CLEC has been authenticated through the LRAF, the CLEC logs in to its designated application (Verigate, LEX and EASE) or performs an application-to-application transaction (DataGate and EDI) to submit pre-order and order transactions.

Instances and Version Summary

In some cases SWBT is running multiple instances of some applications as well as multiple versions in the case of DataGate. As used in this supplement, the term "version" refers to application code that has been modified and is no longer identical to the original application code. The term "instance" refers to multiple copies of the same version for load balance and volume purposes. LEX, Verigate, EASE, and SORD are running multiple instances of the same version of their respective application. Instances allow SWBT to run the same version of the respective application on multiple processors located in either the St. Louis, Missouri or the Dallas, Texas data center. Instances are dynamic and will fluctuate over time based on CLEC volume demands.

DataGate is the only application that maintains multiple versions of the software. Since CLECs can tailor the application to better fit their respective needs, SWBT has agreed to support three versions of the application. A summary of instances and versions follows:

| Application | Instance | Version |
|--------------------|-------------------|----------------|
| EDI* | 1 | 1 |
| LASR* | 1 | 1 |
| DataGate | 9 (3 per version) | 3 |
| Verigate | 8 | 1 |
| LEX | 4 | 1 |
| SORD | 7 | 1 |
| EASE | 5 | 1 |

*Supports multiple versions of OBF (Ordering & Billing Forum) standards, but one single version of software.

Verigate / LEX

Verigate is the GUI (Graphical User Interface) that provides CLECs access to the pre-order functionality provided by DataGate. Verigate resides on the client Toolbar application that is provided by SWBT (proprietary) for the CLEC's PC. The gateway allows CLECs to query transactions such as telephone number reservation, address validation, product/feature availability information, loop qualification information (DSL), and customer service record inquiries.

LEX is a GUI developed by SWBT for CLECs that enables them to perform on-line wholesale ordering. To access LEX, the CLEC must have the SWBT Toolbar client application on their PC, as well as a valid Toolbar ID.

Through review of the technical architecture for Verigate and LEX, we determined SWBT is running eight separate instances of the Verigate application and four separate instances of the LEX application, all running on a single platform. However, each of the instances is running the same version (Verigate version 6.7.4 and LEX version 3.7.0). As CLECs log onto either of these two applications, the instance that is available at that time takes the transaction/query for processing. Therefore, each transaction/query a CLEC executes may be processed on any of the different instances allowing for load balancing and adequate response times.

DataGate

DataGate is an application-to-application interface that allows SWBT and CLEC applications to exchange pre-order information. DataGate provides CLECs with the ability to acquire pre-order information from a single, real time interface, by accessing SWBT back-end legacy applications. The interface is considered middleware, meaning it is used to access back office systems across different platforms and does not store any data. Additionally, DataGate can be integrated with SWBT's EDI Gateway to provide an integrated pre-order and order system.

We determined that SWBT is running three versions of the application distributed across nine instances (three instances per version for performance considerations). Multiple versions of DataGate are running due to CLEC needs. SWBT has enhanced DataGate to handle new products and services, which a CLEC can choose to upgrade depending on the need of its market. According to an agreement between SWBT and the CLECs, SWBT notifies CLECs of new releases of DataGate via an "accessible letter" (SWBT to CLEC communication regarding application changes, updates, etc.) as well as postings to SWBT's external Web site. CLECs have a pre-determined length of time to implement a new version of DataGate, if necessary. Since CLECs are not all on the same migration schedule for the same features within DataGate, SWBT maintains three versions of the DataGate software for the CLECs until they are ready as a customer service feature.

Like LEX and Verigate, SWBT has also designed DataGate to provide for load balancing. When a CLEC enters transactions/queries into DataGate, one of the three instances that are available for that version will accept the transaction/query for processing allowing for load balancing and adequate response times.

EDI

EDI acts as an electronic interface between CLECs and SWBT. EDI translates between the industry standard formats for ordering and proprietary SWBT back office formats. EDI Gateway (SWBT EDI system) supports ordering and provisioning of both resale and UNEs (Unbundled Network Elements). It allows those CLECs running their own proprietary software to submit multiple versions of LSRs (Local Service Requests) to SWBT, and receive acknowledgements, confirmations, and completion status while utilizing the EDI interface.

Through review of the technical architecture, E&Y determined only one instance of EDI exists on one platform. CLECs utilizing the EDI may submit orders in one of three ways: Interactive Agent, Batch, or VAN (Value Added Network). Regardless of the method of transmission, the EDI file must be in a specific format as specified by SWBT for acceptance into the EDI gateway.

The interactive agent is a method of EDI that enables CLECs to submit orders in real time. The orders are received into SWBT's EDI application (SWBT side of the LRAF), and the EDI application confirms receipt of the orders and immediately moves them into LASR for further downstream processing.

The batch method is utilized by some CLECs to enable transmission of multiple orders to SWBT. Once the CLEC has created and batched the orders, the CLEC utilizes the FTP (File Transfer Protocol) or NDM (Network Data Mover) as the transmission mechanism. SWBT receives the transmission into its EDI application on the SWBT side of the LRAF, confirms receipt of the orders, and immediately moves the orders into LASR for further downstream processing.

The VAN method allows CLECs to place either individual or groups of orders on a shared location accessed through the Internet. Periodically, SWBT accesses the VAN location to obtain CLEC orders and pull them into the SWBT EDI application, confirm receipt, and move the orders to LASR for further downstream processing.

Orders from CLECs across the five state region flow through the same EDI mechanism, through to LASR and ultimately to SORD.

EASE

EASE (Easy Access Sales Environment) is an on-line service order negotiation tool used by SWBT's own retail service representatives and is available to CLECs providing resale services for both residential and business customers. Consumer EASE is used by SWBT and CLECs for pre-ordering and ordering functions for customers with 5 lines or fewer. Business EASE is used by SWBT and CLECs for pre-ordering and ordering functions for customers with up to 30 lines.

In reviewing both Consumer and Business EASE, E&Y determined SWBT is running one version of EASE in five separate instances. E&Y tested and confirmed that all five instances of EASE are running the same version of the application. All orders submitted through EASE are then forwarded to SORD for further downstream processing.

LASR

Through review of the technical architecture, E&Y determined that SWBT is running one instance of LASR for the SWBT region. This application takes all LSRs originating from LEX and EDI, conducts a variety of edit checks, and then determines whether the order is MOG (Mechanized Order Generator) eligible. Regardless of whether the CLECs choose to use LEX or EDI, all LSRs are processed by a single version and instance of LASR. If an order is not MOG eligible, the order falls out to the LSC for manual processing. If the LSR meets the requirements for MOG eligibility, the service order is mechanically generated and forwarded to SORD for further downstream processing.

SORD

SORD receives service orders from CLECs through MOG (as discussed above), EASE or from LSC service representatives. In addition, SORD is used to process SWBT retail orders. Through review of the technical architecture, E&Y determined that SWBT is running seven instances of SORD. E&Y tested the seven instances of SORD and validated the hash counts. The seven instances of SORD represent each of the SWBT five states with one instance each running for Missouri, Arkansas, Kansas and Oklahoma and three instances running for Texas. All transactions flow through the same version of the application.

Conclusion

For Ernst & Young's conclusion please refer to the Report of Independent Accountants located in Appendix 1 of this supplement.

Appendix 1: Southwestern Bell Telephone Company Five State Regional OSS Attestation Examination Report and Assertion



■ Ernst & Young LLP
Frost Bank Towers
Suite 1900
100 West Houston Street
San Antonio, Texas 78205-1457
Mail Address
P.O. Box 2938
San Antonio, Texas 78299-2938

■ Phone: (210) 228-9696
Fax: (210) 242-7252
www.ey.com

Report of Independent Accountants

To Management of
Southwestern Bell Telephone Company

We have examined management's assertion, included in the accompanying Report of Management on Southwestern Bell Telephone Company's Operational Support Systems, that as of June 30, 2000, Southwestern Bell Telephone Company ("SWBT") utilized the same operational support systems throughout the SWBT five-state operating region (Arkansas, Kansas, Missouri, Oklahoma and Texas) to support competing local exchange carrier ("CLEC") activity. Management is responsible for the assertion. Our responsibility is to express an opinion on management's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and included such procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, management's assertion that as of June 30, 2000, SWBT utilized the same operational support systems throughout the SWBT five-state operating region (Arkansas, Kansas, Missouri, Oklahoma and Texas) to support CLEC activity is fairly stated, in all material respects.

This report is intended solely for the information and use of SWBT and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

Ernst & Young LLP

October 24, 2000

Michael N. Gilliam
Vice President-Long Distance

SBC Telecommunications, Inc.
530 McCullough
San Antonio, Texas 78215
Phone: 210 886-3855



**Report of Management on
Southwestern Bell Telephone Company's
Operational Support Systems**

Management of Southwestern Bell Telephone Company (SWBT) asserts the same operational support systems were used throughout the SWBT five state operating region (Arkansas, Kansas, Missouri, Oklahoma and Texas) to support competing local exchange carrier (CLEC) activity. A description of each of these operational support systems is listed in Attachment A.

A handwritten signature in black ink that reads "M. N. Gilliam". The signature is written in a cursive style with a horizontal line underneath the name.

Mike Gilliam
Vice President-
Long Distance Compliance
Relief

October 24, 2000

SWBT Operational Support Systems

| | | |
|--|----------|--|
| DataGate | DataGate | DataGate is an application to application interface that allows SWBT and CLEC software programs or applications to exchange information. DataGate provides CLECs with the ability to acquire pre-order information from a single, real time interface, by accessing a set of libraries or programs within SWBT OSS (Operation Support Systems). |
| Easy Access Sales Environment | EASE | EASE is an on-line service order negotiation tool from SWBT's own retail service representatives and is available to CLECs providing resold services for both residence and business customers. Consumer EASE application is used by SWBT and CLECs for pre-ordering and ordering functions for customers with 5 lines or less. Business EASE is used for pre-ordering and ordering for customers with 30 lines or less. |
| Electronic Data Interchange Services | EDI | EDI acts as an electronic interface between CLECs and SWBT. EDI translates between the industry standard formats for ordering and proprietary SWBT back office formats. EDI Gateway supports ordering and provisioning of both resale and UNEs (Unbundled Network Elements). It allows CLECs to submit LSRs (Local Service Requests) to SWBT, receive acknowledgements, confirmations, and completion statuses, while utilizing the EDI interface. |
| LSR Exchange System | LEX | LEX is a GUI (Graphical User Interface) developed by SWBT for CLECs that enables them to perform online wholesale ordering. To access LEX, the CLEC must have the SWBT Toolbar client application on their PC, as well as a valid Toolbar ID. |
| Verification Gateway | Verigate | Verigate provides CLECs access to the pre-order functionality provided by DataGate through a GUI interface launched from the Toolbar client application that resides on the CLEC's PC. |
| Local Access Service Request System | LASR | LASR is an application which receives LSRs (Local Service Requests) submitted electronically by CLECs via LEX or EDI (ordering systems). LSRs are stored within a database in LASR and edit checks are performed on the LSR information for MOG eligibility. |
| Service Order Retrieval and Distribution | SORD | SORD is a mechanized, on-line service order processing system for SWBT. It provides means to create, store, edit, maintain, and distribute requests to other involved work groups for establishing, disconnecting or changing a customer's services. |

Appendix 2: MoPSC Performance Measurement Attestation Examination

Report of Independent Accountants

To Management of
Southwestern Bell Telephone Company

We have examined management's assertion, included in the accompanying Report of Management on Compliance with the Business Rules, that Southwestern Bell Telephone Company's (the Company) reported performance measure results complied with the criteria set forth within business rules documented within Case TO-99-227 (*Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1996*) as filed with the Missouri Public Service Commission (MoPSC) on January 6, 2000 (Business Rules) for each of the one-month periods ended April 30, 2000, May 31, 2000 and June 30, 2000. Management is responsible for ensuring the Company's reported performance measure results comply with the criteria set forth within the Business Rules. Our responsibility is to express an opinion on the Company's compliance based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about the Company's compliance of reported performance measure results with the Business Rules and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on the Company's compliance with specified requirements.

In our opinion, management's assertion that the Company's reported performance measurement results complied with the Business Rules for each of the one-month periods ended April 30, 2000, May 31, 2000 and June 30, 2000, is fairly stated, in all material respects, except for certain instances of noncompliance as discussed below.

To Management of
Southwestern Bell Telephone Company

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As discussed in management's assertion, certain performance measurements contained errors that were subsequently restated after the initial filing or corrected on a prospective basis.

This report is intended solely for the information and use of the Company and the MoPSC and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

Ernst + Young LLP

November 1, 2000

Michael N. Gilliam
Vice President-Long Distance


SBC Telecommunications, Inc.
175 E. Houston Street
San Antonio, Texas 78205
Phone 210 351-5444



**Report of Management on
Compliance with the Business Rules**

Management of Southwestern Bell Telephone Company (the Company) is responsible for reporting performance measure results that comply with the business rules documented in Case TO-99-227 (*Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1996*) as filed by the Staff of the Missouri Public Service Commission on January 6, 2000 (Business Rules). Management is also responsible for establishing and maintaining effective internal control to ensure performance measure results comply with the Business Rules.

Management performed an evaluation of the Company's reported performance measure results to ensure compliance with the Business Rules for each of the one month periods ended April 30, 2000, May 31, 2000 and June 30, 2000. Based on this evaluation, we assert that for each of the one-month periods ended April 30, 2000, May 31, 2000 and June 30, 2000, the Company's reported performance measure results complied with the requirements of the Business Rules, in all material respects, except as discussed in Attachment A.


Michael N. Gilliam
Vice President - Long Distance
Compliance Relief

November 1, 2000

**Report of Management on
Compliance with the Business Rules**

Attachment A

Missouri Performance Measurement (PM) Restatements

The preparation of monthly performance measurement reports involves the collection of thousands of data points which are processed by the performance measure systems. As with any system, which involves collection of data from numerous sources, corrections of a small percentage of the data points within the performance measurement system is a necessary and routine business function. If SWBT determines any error in the data, SWBT makes the correction and discloses these restatements to CLECs via the same web page on which monthly performance reports are made available. In connection with the Ernst & Young LLP performance measurement attestation engagement, SWBT has compiled a list of those items in the April - June 2000 performance measurement reports which have subsequently been restated.

The items listed below were either identified and disclosed by SWBT during its normal process of reviewing Missouri performance measurement reports or discovered as part of the Ernst & Young review process. As appropriate, SWBT corrected reporting of prior month's results and restated those reports to properly reflect the results.

- a) **Data Validity Error (PM 4)** - The calculation of PM 4 - OSS Interface Availability was incorrect for the month of April 2000 as the numerator for the calculation included incorrect data concerning LEX system availability. Through LEX, CLECs can electronically create and transmit resale and unbundled network element (UNE) local service requests to SWBT. PM 4 was corrected and restated in May 2000. This restatement resulted in the measure falling short of the benchmark (SWBT identified).
- b) **Data Validity Error (PM 5.1)** - An incorrect data input file was used to calculate April 2000 results for PM 5.1 - % Firm Order Confirmations (FOCs) received within "x" hours (DSL). The PM was calculated on the basis of a percentage of FOCs returned within 5 hours rather than 24 hours. PM 5.1 was corrected and restated in May 2000. There was no change in the aggregate outcome as a result of this restatement, (i.e., the measure continued to meet the benchmark) (SWBT identified).
- c) **Calculation Error (PM 60 & 61)** - Numerators and denominators were inadvertently switched for PM 60 and PM 61 resulting in an error in the respective PM calculations for the month of May 2000. Programmers have been advised that the input data must be standardized and arranged consistently in the future. Prior PM calculations were restated in July 2000 (SWBT identified).

- d) **Calculation Error (PM 18) – PM 18 – Billing Timeliness (Wholesale Bills)** was incorrectly reported for the months of April and May 2000 due to an incorrect source data input file. The affected PM was corrected and restated in July 2000. There was no change in the aggregate outcome as a result of this restatement, (i.e., the measure continued to meet the benchmark) (SWBT identified).
- e) **Data Validity Error (PMs 57- 63 & PMs 65 - 69) – CLEC data** for these PMs was improperly split between the Kansas City, Missouri and Kansas City, Kansas market areas for the months of April and May 2000. A new methodology was implemented to properly split the data between the two market areas and the PM results for April and May 2000 were corrected and restated in July 2000. There was no change in the aggregate outcome as a result of this restatement (SWBT identified).
- f) **Cell Reference Error (PM 35-05) -** Within the Excel worksheet used to calculate the final calculation and z-score for PM 35-05 - % Trouble Reports Within 10 Days of Installation, a wrong cell was referenced. This cell reference error affected the reported months of April and May 2000. Therefore, SWBT's calculations and z score for its retail operation were incorrectly reported for those months. For one market area, one disaggregation (out of a possible twelve total disaggregations for the market area) was originally reported in parity and should have been reported as out of parity. Beginning with June 2000 PM reporting the worksheet was corrected. SWBT restated all affected months reports in October 2000. There was no change in the aggregate outcome as a result of this restatement (E&Y identified).
- g) **Calculation Error (PM 111) -** In October 2000, SWBT discovered an error in its calculation of the average interval for PM 111 – Average Update Interval for Directory Assistance Database. SWBT corrected the method for calculating the interval and restated its PM data back to October 1999. (SWBT identified).

Missouri Performance Measurement Prospective Changes

SWBT is taking the steps noted below on a prospective basis to correct and/or enhance its PM reporting in Missouri.

- a) **Disaggregation Error (PM 1) –** This PM requires a disaggregation by Customer Service Record (CSR) segregated into CSRs with 1 to 30 lines and CSRs with greater than 30 lines. For April, May, and June 2000, CSR results were reported for CSRs of 1 to 30 lines. Due to constraints within the Datagate system, SWBT was not able to report all the diagnostic disaggregations for CSRs greater than 30 lines. The reporting has subsequently been moved to DSS (Decision Support System) and will be reported per the Business Rules for both Datagate and Verigate with October 2000 reporting. Since this change will result in a modification to the code, this measure can not be recalculated (E&Y identified).

- b) **Calculation Error (PM 5, 6 and 94)** – Timestamp receipts recorded in the Service Order Retrieval and Distribution System (SORD) did not agree to supporting documentation for PM 5 - % Firm Order Confirmations Received Within "x" Hours, PM 6 – Average Time to Return Firm Order Confirmations, and PM 94 - % Firm Order Confirmations Received Within "x" Hours (LNP). The receipt and transmittal timestamps recorded by Local Service Center (LSC) personnel are used to calculate the time interval between the receipt of an order and the transmission of a FOC. SWBT's process states that the LSC personnel should use the time stamp on the header on the fax received from the CLEC. However, in certain instances, this process was not being followed. SWBT has taken steps to inform its clerks and supervisory personnel of the correct procedure (i.e., using the actual receipt time directly off the fax header). Since this finding resulted in a change in SWBT's process, this measure can not be recalculated (E&Y Identified).
- c) **Disaggregation Issue (PM 13)** – This PM requires a disaggregation by service type (e.g., UNE loops, Resale, UNE Combos, etc.) and had been reported by interface system (i.e. LEX, EDI, EASE) during the Evaluation Period. Reporting by interface rather than by service had been accepted for reporting in Texas, and was followed for reporting in the other SWBT states as well. However, during the six-month review process in Texas it was determined that disaggregation by service type would be required prospectively. Therefore, beginning with September 2000 data, the PM will be reported by service type in Missouri. (E&Y Identified).
- d) **Data Exclusion Issue (PM 18)** – The calculation of the PM excluded billing information for facilities and UNE charges during the Evaluation Period. At the time the PM was implemented resale was the predominant mode of entry, therefore no provision was made for inclusion of facilities and UNE charges. During the six-month review process in Texas, it was recognized that Billing Data Tape (BDT) was not being captured for facilities and UNE charges. During the six-month review, CLECs requested that SWBT expand the PM to include all electronic billing. SWBT concurred with this request and the business rules have been revised to include facilities and UNE charges. This change is expected to be implemented with December 2000 data. Since this change will result in a modification to the code, this measure can not be recalculated (E&Y Identified).
- e) **Disaggregation Error (PM 43)** - PM 43 - Average Installation Interval was reported incorrectly for the month of May 2000 in the Kansas City, Missouri (KM) market area. Circuits should have been reported in the Kansas City, Kansas market area but were reported in the KM market area. The database tables causing this discrepancy were corrected in September 2000. Since this change will result in a modification to the code, this measure can not be recalculated (E&Y Identified)

- f) **Data Exclusion Error (PM 58)** – Certain market offices are excluded from PM 58. For April, May, and June 2000, PM data for orders originating from market offices EX (CLEC originated order, LSC personnel typed into SWBT's EXACT/SORD systems) and SO (CLEC originated order, CLEC personnel typed directly into SWBT's EXACT/SORD systems) were excluded from the PM while the Business Rules do not explicitly state that these market offices should be excluded. Therefore, PM results were not stated correctly on the web site. SWBT updated the programming logic to include market offices EX and SO on June 30, 2000. (E&Y identified).
- g) **Data Exclusion Error (PM 57)** – In December 1999, PM 57 – Average Response Time for Loop Make-up Information was incorrectly excluding the time between the date the LSR was received by SWBT and the date it was sent to the engineer for review. Therefore, the response duration (length of time between receipt of the request from the CLEC and time the qualification is made available to the CLEC) excluded the number of days between the date the CLEC DSL service request was received and the date the loop qualification was sent to engineering. This was corrected in January 2000, but with the subsequent implementation of a new database, the response duration was again calculated excluding the time between date the LSR was received by SWBT and the date sent to the engineer. SWBT has submitted a programming change to address this erroneous exclusion. In October 2000, a correction was made retroactively to the date of the implementation of the new database. Accordingly, PM 57 was restated with the October 20, 2000 reports. (E&Y identified).
- h) **Coding Error (PMs 27 – 33)** – In September 2000, SWBT and a CLEC determined during joint data validation that certain orders had been excluded from the raw data as CLEC-caused missed due dates when, according to the CLEC's records, the missed due date was attributable to a SWBT cause. Research revealed that a Missed Appointment Code (MAC) of "SL" (customer caused miss) was erroneously being applied in the LSC to close orders which were being held in a pending status and not flowing further through the SWBT OSS systems. If a missed due date results from failure on the part of the LSC to timely clear an error condition which prevents the order from provisioning, LSC personnel should assign a MAC indicating a SWBT cause for the miss. SWBT will restate these measures for the evaluation period with November 20, 2000 reporting. The impact of this restatement is expected to be negligible on aggregate results. (SWBT identified).

On Thursday, September 21, 2000, the LSC began implementing corrective actions to address this issue. The LSC Service Representative Development Managers (RDMs) reviewed the methods and procedures for coding missed due dates with all LSC service representatives through intensive training sessions held during the latter part of September through the beginning of October to ensure that future data would not be affected by improper coding. The RDMs provided service representatives with an additional copy of the list of MAC codes and reminded each of them about the location and use of the method. They also discussed appropriate use of the MAC codes at length. In addition, the RDMs are actively supervising the proper application of MACs as part of their quality reviews in the LSC. The LSC first line managers also conduct service order reviews on the orders that are typed and processed by their assigned service representatives. As part of this review, they have placed additional emphasis on the use of the MAC to ensure coding accuracy. The managers will provide immediate feedback to service representatives, together with additional training as necessary.

Other Matters

- a) **Disaggregation Issue** (PMs 43, 45, 46, 49, 52, 53, 54, 56, 58, 59, 62, 65, 67, 69, 107) – In implementing the following PMs, SWBT reported more levels of disaggregation than required in the Business Rules: 43, 45, 46, 49, 52, 53, 54, 56, 58, 59, 62, 65, 67, 69, 107. SWBT acknowledges that these PMs have been reported in more levels of disaggregation than required. These additional levels of disaggregation increase the usefulness of the reported data while not changing the results of the performance measures (E&Y identified).
- b) **Data Exclusion Issue** (PM 59) – The Business Rules governing PM 59 – Percent Installation (Trouble Reports) Within 30 Days of Installation, provide for an exclusion for trouble reports received on the due date before service order completion. Service order completion times are not present in the trouble report data in the Work Force Administration (WFA) system. Accordingly, this exclusion cannot be taken (E&Y identified).
- c) **Disaggregation Error** (Various Provisioning and Maintenance PMs) - SWBT makes every effort to identify the correct market area for all transactions, reportable by market area. In some cases (this only affects manual orders other than POTS), however, it is not possible to associate a market area with a particular transaction. When a specific market area cannot be identified, records are excluded from the PM calculations (E&Y identified).

Appendix 3: MoPSC OSS Agreed-Upon Procedures Report to Assist in the Evaluation of SWBT OSS Capacity in Missouri

Report of Independent Accountants on Applying Agreed-Upon Procedures

To the Management of SBC Communications Inc.

We have performed the procedures enumerated below, which were agreed to by Southwestern Bell Telephone (SWBT) Company and the Missouri Public Service Commission (MoPSC) Staff, solely to assist in evaluating management's assertion that SWBT's five-state regional Operations Support Systems (OSS) are capable of supporting commercial pre-order and order volumes specific to Missouri as of September 30, 2000. This engagement was performed in accordance with standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the specified users of the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings are summarized in Appendix A. These procedures and the resulting findings are not intended to be an interpretation of any legal or regulatory rules, regulations or requirements or SWBT's compliance with such rules, regulations or requirements.

We were not engaged to, and did not, perform an examination, the objective of which would be the expression of an opinion on management's assertion that SWBT's five-state regional OSS are capable of supporting commercial pre-order and order volumes specific to Missouri as of September 30, 2000. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of SWBT and the MoPSC, and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes. However, this report is a matter of public record and its distribution is not limited.



November 1, 2000

Appendix A

Results of Agreed-Upon Procedures

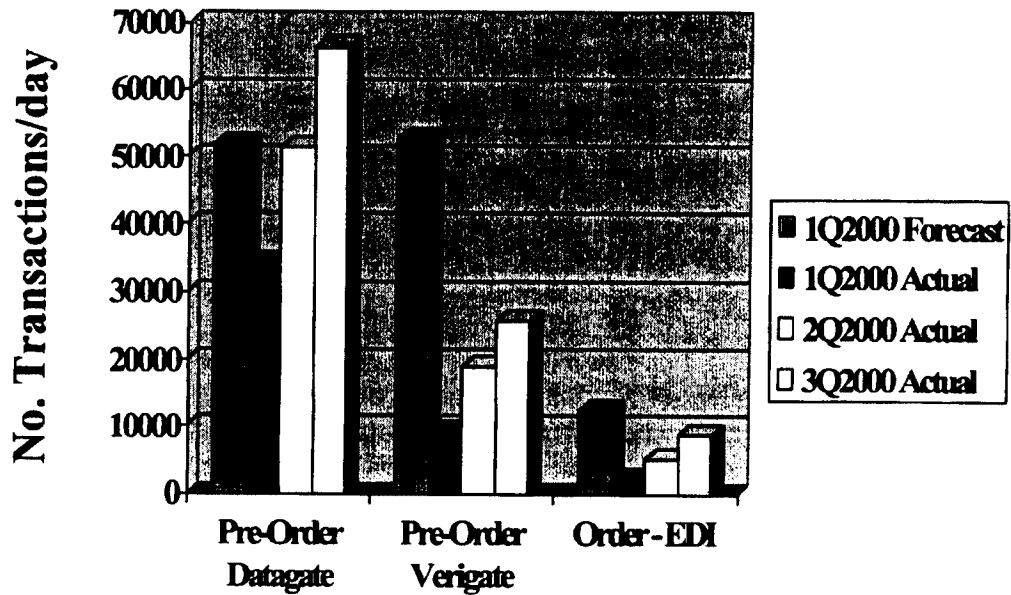
1. Obtained Telcordia's OSS Capacity Report, dated September 1999 (Telcordia Report) related to SWBT's request for Authorization to Provide In-Region InterLATA Service Originating in Texas Pursuant to Section 271 of the Telecommunications Act of 1996, and read the test results contained therein.
2. Read the Telcordia Test Methodology within the Telcordia Report, specifically the volumes and forecasts used. We determined that volumes tested within the Telcordia Report included Missouri commercial volumes.
3. Reviewed the design of SWBT's OSS and determined the systems utilized as of September 30, 2000 to process CLEC orders and requests are the same for Texas and Missouri.
4. Compared SWBT's five-state regional OSS commercial volumes as of September 30, 2000 to volumes forecasted within the Telcordia Report noting the current volumes did not exceed Telcordia forecasted volumes. See Appendix B for results.
5. Reviewed OSS system and application upgrades made by SWBT to increase capacity and scalability subsequent to the Telcordia Report through September 30, 2000 noting that SWBT's OSS were upgraded and scaled to increase capacity.
6. Read performance measure results for Pre-Ordering (PM-1, PM-2), Firm Order Confirmation (FOC) (PM-5) and Rejects (PM-10) as of the date of the Telcordia Report (September 1999) through September 30, 2000. The PM results for this period are reflected in Appendix C.

Appendix B

The chart below reflects the Telcordia forecasted first quarter 2000 volumes per day for pre-order Datagate, pre-order Verigate and order – EDI compared to actual volumes per day for the first, second and third quarter of 2000.

NOTE: Telcordia tested only orders that flowed through EDI. Therefore, actual numbers only reflected below only include orders that flow through EDI. However, the additional volume of orders for LEX for 3rd quarter was 307,866. Therefore, the total order volume for EDI and LEX for the 3rd quarter was 985,171.¹

Forecast vs. Actual Volumes/day



2

Telcordia utilized the first quarter 2000 forecasted volumes above to perform its capacity testing. These forecasted volumes represent a 25% increase over the forecasted volumes provided by competing local exchange carriers for that same period.

¹ LEX volumes noted were provided by SWBT.

² Volumes obtained from DOJ report.

Appendix C

Pre-Order PM 1 – Average Response Time for OSS Pre-Order Interfaces

- Definition: The average response time in seconds from the SWBT side of the Remote Access Facility (RAF) and return for pre-order interfaces (Verigate, Datagate and EDI where the pre-order functionality is integrated) by function
- Pre-order measurements apply to all five states (Missouri, Arkansas, Kansas, Oklahoma and Texas)
- The columns below represent reported PM 1 results from September 1999 through September 2000. The top number is seconds and the bottom number is transactions

| System | Benchmark | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept |
|-----------------------------|--------------|----------------|----------------|----------------|----------------|----------------|----------------|-----------------|-----------------|-----------------|-----------------|----------------|----------------|----------------|
| EDI/ Datagate | | | | | | | | | | | | | | |
| Address Verification (1-01) | 4.7 seconds | 3.3 14,952 | 2.1 32,206 | 3.2 42,080 | 2.7 59,643 | 2.5 63,316 | 3.0 120,677 | 3.2 182,358 | 3.4 149,665 | 2.4 155,838 | 2.4 181,611 | 2.1 162,598 | 2.4 255,762 | 2.3 219,972 |
| Request for TN (1-02) | 4.5 seconds | 4.3 11,188 | 2.9 25,792 | 3.2 30,548 | 2.7 44,662 | 3.0 42,774 | 3.1 49,883 | 3.1 54,721 | 4.3 63,904 | 3.6 82,349 | 3.4 94,527 | 3.0 92,266 | 3.1 152,387 | 3.2 130,001 |
| Request for CSR (1-03) | 6.6 seconds | 4.4 52,559 | 3.3 37,935 | 3.8 30,952 | 3.2 56,030 | 3.6 28,859 | 3.3 62,862 | 4.3 77,577 | 4.0 87,439 | 4.1 144,684 | 4.5 245,811 | 4.0 231,878 | 4.2 325,493 | 4.1 277,807 |
| Service Availability (1-04) | 6.6 seconds | 1.1 36,445 | 2.2 87,938 | 0.8 113,695 | 0.7 157,653 | 0.8 245,234 | 0.8 228,643 | 0.8 288,265 | 1.2 233,701 | 1.3 290,175 | 2.1 328,629 | 1.0 245,148 | 1.2 371,213 | 1.9 331,230 |
| Due Date (1-05) | 1.0 second | 0.6 28,553 | 0.7 67,870 | 0.5 86,501 | 0.7 140,439 | 0.4 134,854 | 1.0 160,741 | 0.6 205,511 | 0.8 206,123 | 0.7 253,901 | 0.8 282,813 | 0.6 211,759 | 0.5 327,503 | 0.9 290,664 |
| Dispatch Required (1-06) | 12.6 seconds | 1.5 1,388 | 8.3 2,307 | 9.4 2,433 | 8.3 3,933 | 8.6 4,780 | 9.5 6,949 | 9.5 9,329 | 9.8 9,607 | 10.0 13,806 | 9.4 18,411 | 8.4 21,668 | 8.8 43,963 | 9.2 39,070 |
| PIC (1-07) | 28.0 seconds | 32.5 14,993 | 20.3 33,306 | 21.2 45,575 | 19.3 70,211 | 19.4 69,465 | 18.3 80,972 | 18.7 116,181 | 21.3 150,558 | 21.8 167,415 | 15.5 179,153 | 6.0 148,711 | 9.4 237,971 | 5.9 197,602 |

Pre-Order PM 1 – Average Response Time for OSS Pre-Order Interfaces (continued)

| System | Benchmark | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept |
|-----------------------------|--------------|----------------|----------------|---------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Verigate | | | | | | | | | | | | | | |
| Address Verification (1-08) | 4.7 seconds | 6.4 10,771 | 5.7 11,271 | 5.5 12,530 | 4.9 16,473 | 5.3 20,510 | 2.9 31,196 | 2.9 55,464 | 3.9 70,712 | 3.4 119,070 | 3.0 108,361 | 2.9 97,432 | 2.9 122,268 | 3.1 194,852 |
| Request for TN (1-09) | 4.5 seconds | 2.8 5,856 | 2.7 6,172 | 2.5 4,831 | 2.4 6,610 | 2.8 8,915 | 3.0 9,820 | 2.3 11,092 | 2.6 15,034 | 2.5 19,606 | 2.0 28,097 | 1.9 31,431 | 2.1 50,202 | 2.2 58,642 |
| Request for CSR (1-10) | 6.6 seconds | 3.1 102,813 | 2.4 109,988 | 2.6 96,797 | 2.7 113,560 | 2.7 127,029 | 2.3 145,847 | 3.1 183,295 | 2.9 231,239 | 2.6 287,785 | 2.8 325,521 | 2.9 290,536 | 2.4 329,018 | 3.4 412,399 |
| Service Availability (1-11) | 6.6 seconds | 4.6 138 | 5.8 151 | 3.1 233 | 7.9 314 | 3.6 409 | 2.8 408 | 2.6 545 | 2.7 585 | 2.2 634 | 4.8 781 | 2.2 723 | 2.7 1,105 | 3.7 2,029 |
| Due Date (1-12) | 1.0 second | 0.6 1,316 | 0.7 1,323 | 0.5 1,210 | 1.2 1,702 | 0.6 1,963 | 0.8 2,499 | 0.6 3,427 | 0.9 4,341 | 1.1 5,463 | 1.0 8,693 | 0.6 9,742 | 0.6 18,804 | 1.6 25,583 |
| Dispatch Required (1-13) | 12.6 seconds | 5.8 506 | 4.8 317 | 8.6 393 | 5.8 579 | 5.2 588 | 5.3 460 | 6.2 678 | 6.4 891 | 6.0 2,042 | 6.6 6,518 | 5.1 6,431 | 8.7 11,106 | 9.3 13,738 |
| PIC (1-14) | TBD | 17.7 71 | 18.9 70 | 19.2 28 | 18.2 42 | 20.4 43 | 15.5 55 | 20.8 68 | 20.0 129 | 18.5 190 | 19.4 240 | 19.2 217 | 20.0 331 | 20.2 485 |

Yellow = Did not meet benchmark

Pre-Order PM 2 – Percent Response Received Within “x” Seconds – OSS Interfaces

- Definition: The percent of responses completed in “x” seconds for pre-order interfaces (Verigate, Datagate and EDI where the pre-order functionality is integrated) by function
- Pre-order measurements apply to all five states (Missouri, Arkansas, Kansas, Oklahoma, and Texas); there is no need to disaggregate them by state
- The columns below represent reported PM 2 results from September 1999 through September 2000. The top two numbers are percentage of pre-orders meeting standard and the bottom number is transactions

| System | Benchmark | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept |
|-----------------------------|--|------------------------|-----------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|------------------------|-----------------------|-------------------------|-------------------------|------------------------|
| EDI/Datagate | | | | | | | | | | | | | | |
| Address Verification (2-01) | 90%, 8.0 seconds 95%, 12.0 seconds | 94% 97% 14,952 | 99% 100% 32,206 | 97% 99% 42,080 | 92% 97% 59,643 | 98% 100% 63,316 | 97% 100% 120,677 | 97% 100% 182,358 | 94% 97% 149,665 | 97% 99% 155,838 | 98% 99% 181,611 | 99% 100% 162,598 | 98% 100% 255,762 | 98% 100% 219,972 |
| Request for TN (2-02) | 90%, 7.0 seconds 95%, 9.5 seconds | 89% 92% 11,188 | 97% 99% 25,792 | 96% 99% 30,548 | 98% 100% 44,662 | 97% 99% 42,774 | 97% 99% 49,883 | 97% 99% 54,721 | 92% 95% 63,904 | 95% 98% 82,349 | 96% 99% 94,527 | 97% 99% 92,266 | 97% 99% 152,387 | 97% 99% 130,001 |
| Request for CSR (2-03) | 90%, 8.0 seconds 95%, 13.0 seconds | 96% 99% 52,559 | 98% 99% 37,935 | 96% 99% 30,952 | 99% 100% 56,030 | 97% 99% 28,859 | 98% 99% 62,862 | 95% 99% 77,577 | 97% 99% 87,439 | 96% 99% 144,684 | 95% 98% 245,811 | 96% 99% 231,878 | 95% 99% 325,493 | 95% 99% 277,807 |
| Service Availability (2-04) | 90%, 12.0 seconds 95%, 16.0 seconds | 100% 100% 36,445 | 98% 98% 87,938 | 100% 100% 113,695 | 100% 100% 157,653 | 100% 100% 245,234 | 100% 100% 228,643 | 100% 100% 288,265 | 100% 100% 233,701 | 99% 100% 290,175 | 98% 98% 328,629 | 100% 100% 245,148 | 100% 100% 371,213 | 99% 100% 331,230 |
| Due Date (2-05) | 90%, 1.0 seconds 95%, 2.0 seconds | 97% 99% 28,553 | 97% 99% 67,870 | 97% 99% 86,501 | 97% 98% 140,439 | 98% 99% 134,854 | 96% 98% 160,741 | 97% 99% 205,511 | 95% 98% 206,123 | 94% 98% 253,901 | 92% 97% 282,813 | 95% 98% 211,759 | 97% 98% 327,503 | 97% 97% 290,664 |
| Dispatch Required (2-06) | 90%, 15.0 seconds 95%, 25.0 seconds | 84% 91% 1,388 | 98% 100% 2,307 | 95% 100% 2,433 | 98% 100% 3,933 | 97% 100% 4,780 | 94% 100% 6,949 | 93% 100% 9,329 | 90% 99% 9,607 | 88% 99% 13,806 | 93% 99% 18,411 | 97% 100% 21,668 | 96% 100% 43,963 | 92% 99% 39,070 |

Pre-Order PM 2 – Percent Response Received Within “x” Seconds – OSS Interfaces (continued)

| System | Benchmark | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept |
|-----------------------------|--|-----------------------|-----------------------|----------------------|-----------------------|-----------------------|-----------------------|------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Verigate | | | | | | | | | | | | | | |
| PIC (2-07) | 90%, 39.0 seconds 95%, 60 seconds | 84% 91% 14,993 | 96% 99% 33,306 | 95% 99% 45,575 | 97% 100% 70,211 | 97% 100% 69,465 | 97% 100% 80,972 | 97% 100% 116,181 | 93% 99% 150,558 | 93% 99% 167,415 | 94% 97% 179,153 | 96% 96% 148,711 | 90% 90% 237,971 | 97% 97% 197,602 |
| Address Verification (2-08) | 80%, 5.0 seconds 90%, 7.0 seconds | 79% 83% 10,771 | 79% 83% 11,271 | 81% 86% 12,530 | 83% 87% 16,473 | 77% 82% 20,510 | 91% 95% 31,196 | 89% 94% 55,464 | 85% 91% 70,712 | 88% 93% 119,070 | 89% 94% 108,361 | 90% 95% 97,432 | 89% 94% 122,268 | 89% 94% 194,852 |
| Request for TN (2-09) | 80%, 4.0 seconds 90%, 6.0 seconds | 78% 92% 5,856 | 79% 93% 6,172 | 80% 94% 4,831 | 81% 95% 6,610 | 76% 93% 8,915 | 77% 93% 9,820 | 86% 95% 11,092 | 89% 95% 15,034 | 91% 96% 19,606 | 94% 97% 28,097 | 96% 98% 31,431 | 94% 98% 50,202 | 94% 97% 58,642 |
| Request for CSR (2-10) | 80%, 7.0 seconds 90%, 10.0 seconds | 97% 99% 102,813 | 98% 99% 109,988 | 97% 98% 96,797 | 98% 98% 113,560 | 97% 99% 127,029 | 98% 99% 145,847 | 95% 97% 183,295 | 98% 99% 231,238 | 98% 99% 287,785 | 98% 99% 325,521 | 97% 98% 290,536 | 98% 99% 329,018 | 94% 96% 412,399 |
| Service Availability (2-11) | 80%, 11.0 seconds 90%, 13.0 seconds | 88% 90% 138 | 95% 97% 151 | 94% 98% 233 | 96% 98% 314 | 92% 96% 409 | 95% 97% 408 | 94% 96% 545 | 95% 96% 585 | 98% 98% 634 | 95% 96% 781 | 96% 97% 723 | 97% 98% 1,105 | 95% 96% 2,029 |
| Due Date (2-12) | 80%, 2.0 seconds 90%, 3.0 seconds | 99% 99% 1,316 | 99% 99% 1,323 | 98% 99% 1,210 | 98% 98% 1,702 | 99% 99% 1,963 | 99% 99% 2,499 | 99% 99% 3,427 | 98% 99% 4,341 | 97% 98% 5,463 | 97% 98% 8,693 | 98% 99% 9,742 | 99% 99% 18,804 | 97% 97% 25,583 |
| Dispatch Required (2-13) | 80%, 17.0 seconds 90%, 19.0 seconds | 97% 97% 506 | 100% 100% 317 | 97% 97% 303 | 98% 99% 579 | 99% 100% 588 | 100% 100% 460 | 99% 100% 678 | 98% 99% 891 | 99% 100% 2,042 | 98% 99% 6,518 | 96% 96% 6,431 | 86% 86% 11,106 | 85% 86% 13,738 |
| PIC (2-14) | IBD transactions | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| | | 71 | 70 | 28 | 42 | 43 | 55 | 68 | 129 | 190 | 240 | 217 | 331 | 485 |

Yellow Did not meet benchmark

Order PM 5 – Percent Firm Order Confirmations (FOCs) Returned

- Definition: Percent of FOCs returned within a specified time frame from receipt of a complete and accurate service request to return of confirmation to CLEC
- All data through November 1999 is a five-state total; all data after November 1999 is state specific
- The columns below represent reported PM 5 results from September 1999 through September 2000. The top number is percentage of FOCs meeting standard and the bottom number is transactions

| System | Benchmark | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept |
|--------------------------------------|-----------|-----------------|-----------------|-----------------|----------------|-----------------|-----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| EFX | | | | | | | | | | | | | | |
| Residence and Simple Business (5-01) | 95% | 95.4% 5,985 | 93.9% 6,823 | 95.8% 8,326 | 99.2% 1,211 | 98.6% 1,476 | 98.7% 1,754 | 98.1% 2,211 | 97.5% 2,189 | 98.5% 2,304 | 97% 2,948 | 96.9% 2,423 | 95.8% 3,196 | 97.8% 3,084 |
| Complex Business (1-200) (5-02) | 94% | 96.5% 1,271 | 88.8% 2,427 | 93.4% 2,261 | 99% 393 | 98.4% 430 | 98.2% 509 | 97.9% 807 | 98.2% 713 | 99.3% 731 | 96% 705 | 92.1% 581 | 93.8% 632 | 98.8% 603 |
| UNE Loop (1-49) (5-04) | 95% | 94.1% 1,479 | 90.1% 1,723 | 94.1% 2,546 | 91.2% 57 | 90.5% 95 | 88.8% 80 | 97.8% 134 | 97.4% 77 | 98.3% 120 | 94.5% 237 | 87.7% 228 | 95.1% 284 | 94.7% 320 |
| EDI | | | | | | | | | | | | | | |
| Residence and Simple Business (5-07) | 95% | 99.5% 40,143 | 99.1% 18,233 | 99.8% 18,170 | 100% 177 | 100% 293 | 100% 137 | 99.4% 154 | 100% 229 | 99.5% 216 | 100% 220 | 100% 198 | 96.6% 176 | 100% 202 |
| UNE Loop (1-49) (5-10) | 95% | 96.3% 27 | 88.1% 118 | 92.7% 179 | N/A | N/A | N/A | N/A | 100% 1 | 93.1% 29 | 90.5% 95 | 96.5% 57 | 92.5% 53 | 96.4% 55 |
| Manual | | | | | | | | | | | | | | |
| Residence and Simple Business (5-13) | 95% | 94.1% 87,570 | 96.4% 88,996 | 97.1% 84,580 | 97.3% 9,026 | 99.2% 10,466 | 98.6% 10,296 | 98.8% 9,721 | 98.6% 7,742 | 99% 9,321 | 95.4% 9,158 | 96.1% 7,338 | 96.8% 9,833 | 98% 8,353 |
| Complex Business (1-200) (5-14) | 94% | N/A | 83.9% 1,490 | 87.9% 1,640 | 98.5% 259 | 100% 260 | 99.4% 178 | 98.9% 179 | 97.3% 184 | 99.5% 196 | 99.4% 160 | 100% 153 | 99.6% 234 | 96% 175 |
| UNE Loop (1-49) (5-16) | 95% | 94.7% 1,637 | 88.7% 1,578 | 80.7% 1,028 | 98.3% 235 | 100% 144 | 98.3% 60 | 94.8% 96 | 97.1% 70 | 93.9% 49 | 100% 52 | 88.9% 36 | 89.7% 39 | 85.7% 14 |
| Switch Ports (5-18) | 95% | 89% 218 | 87% 261 | 74.2% 310 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |

Yellow = Did not meet benchmark

Order PM 10 – Percent Mechanized Rejects Returned Within One Hour of Receipt in LASR

- Definition: Percent mechanized rejects returned within one hour of the receipt of the reject in LASR
- All data through April 2000 is a five-state total; all data after April 2000 is state specific
- The columns below represent reported PM 10 results from September 1999 through September 2000. The top number is percentage of mechanized rejects meeting standard and the bottom number is transactions

| System | Benchmark | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept |
|--------|-----------|----------------|----------------|----------------|---------------|---------------|----------------|-----------------|-----------------|----------------|----------------|----------------|---------------|---------------|
| LEX | 97% | 100% 5,234 | 100% 6,702 | 99.8% 5,869 | 100% 6,386 | 100% 8,840 | 99.9% 9,454 | 99.9% 16,162 | 99.9% 17,671 | 99.9% 1,793 | 99.9% 2,050 | 99.8% 1,773 | 100% 2,234 | 100% 2,330 |
| EDI | 97% | 99.7% 9,039 | 99.7% 4,562 | 100% 5,486 | 100% 6,092 | 100% 5,544 | 100% 7,566 | 99.3% 12,620 | 100% 10,561 | 100% 444 | 98% 1,203 | 99.8% 534 | 99.9% 755 | 99.1% 846 |

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