

DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

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1 **DISCUSSION OF PERFORMANCE MEASUREMENTS DATA**

2
3 **I. INTRODUCTION**

4
5 This Supplemental Exhibit presents BellSouth's performance measurements
6 data in Kentucky for July 2001. The performance data for Kentucky is
7 provided in Attachment 1B. In addition, Attachments 2 and 3 to Exhibit AJV-
8 6, filed originally on July 10, 2001, have been updated for July 2001 data and
9 are attached to this supplemental exhibit as Attachments 2B and 3B.
10 Attachments 4, 5 and 6 to Exhibit AJV-6 have not been modified, and are,
11 therefore, not included in this supplemental exhibit.

12
13 **II. ANALYSIS OF PERFORMANCE MEASUREMENTS**

14
15 **A. Introduction**

16
17 Attachment 1B is the Monthly State Summary (MSS) for Kentucky for July
18 2001. The July MSS, similar to those of May and June, contains 2,250 sub-
19 metrics. In May 2001, BellSouth met or exceeded the comparison criteria for
20 414 of the 487 sub-metrics, or 85%, that had CLEC activity and were
21 compared to benchmarks or retail analogues. All measures and sub-metrics
22 were included in the May calculations. BellSouth has identified three
23 measures that are currently under investigation that have known deficiencies

1 in their calculations. They are Average Jeopardy Notice Interval, FOC &
2 Reject Completeness, and LNP Disconnect Timeliness. The calculations for
3 these three measures were not included in the June numbers. BellSouth met
4 or exceeded the benchmark / retail analogue for 368 of the 425 sub-metrics,
5 or 87% that had CLEC activity in June 2001. In the July performance results,
6 BellSouth met or exceeded the benchmark or retail analogue for 424 of the
7 488 sub-metrics, or 87%, that had CLEC activity. The calculations for the
8 three measures mentioned above were also not included in the July numbers.
9 Even though these measures are included in the MSS and in the total number
10 of measurements calculation (2,250), they are excluded from the
11 "Made/Total" percentage calculations (424/488).

12
13 During the three-month period, May through July 2001, again excluding the
14 three measures mentioned above, there were a total of 329 sub-metrics that
15 had CLEC activity for all three months and that were compared with either
16 benchmarks or retail analogues. Of these 329 sub-metrics, 249 sub-metrics
17 satisfied the comparison criteria during all three months, and another 42 met
18 the criteria for two of the three months – over 88% of the sub-metrics that had
19 activity in all three months satisfied the comparison criteria in at least two of
20 the three months.

21
22 Each sub-metric designated as having not satisfied the benchmark or
23 BellSouth retail analogue requirement for May, June and/or July 2001 is

1 included in this Exhibit. Each sub-metric discussed is labeled as being
2 missed in either one, two or all three of the months.

3
4 The following paragraphs will address specific performance measurements
5 associated with each checklist item.

6

7 **B. CHECKLIST ITEM 1 – INTERCONNECTION**

8

9 **1. Collocation**

10 BellSouth provides three separate collocation reports: 1) Average Response
11 Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.
12 Section E in Attachment 1B, Items E.1.1.1 through E.1.3.3, provides these
13 results. BellSouth met the approved benchmarks for all of the sub-metrics
14 with CLEC activity in May and June 2001. There was no CLEC activity for
15 any of these measures in July 2001.

16

17 **2. Local Interconnection Trunking**

18 **Trunking Reports**

19 Attachment 1B, Section C, Items C.1.1 to C.4.2 of the July MSS contains data
20 for ordering, provisioning, maintenance and repair, and billing associated with
21 Local Interconnection Trunks.

22

23 In May and June 2001, BellSouth met 11 of 12 sub-metrics or 92% of the
24 applicable benchmarks/analogues for all local interconnection trunking

1 measures having CLEC activity. In July 2001, BellSouth met the
2 benchmarks/retail analogue comparisons for all of the 14 local
3 interconnection trunking sub-metrics. The trunk blockage measurement was
4 the only sub-metric that appears to have been missed in May 2001. As I
5 explain later, the data does not indicate disparate treatment between
6 blockage for BellSouth versus the CLECs. The sub-metric that did not meet
7 the retail analogue comparison in June 2001 is as follows:

8

9 Order Completion Interval / Local Interoffice Trunking (C.2.1) (June)

10 There were a total of 24 orders completed in June 2001 with an average
11 interval of 34.67 days compared with 20.48 days for the retail analogue. Of
12 the 24 orders that completed, the CLEC requested extended due dates for 11
13 and was not ready for 3 others. The exclusion of the 14 orders with extended
14 due dates would have allowed this sub-metric to have met or exceeded the
15 retail analogue in June. BellSouth exceeded the retail analogue comparison
16 for this sub-metric in July 2001.

17

18 Trunk Blockage

19 BellSouth has developed a trunk blocking report that compares BellSouth
20 retail's trunk blockage rates to those of CLECs. The report, Trunk Group
21 Performance Report (TGP), Attachment 3B, displays trunk blocking in a
22 manner that accurately represents the customer experience. The TGP report
23 tabulates actual call blocking as a percentage of call attempts for all

1 comparable trunk groups administered by BellSouth that handle CLEC and
2 BellSouth traffic. The TGP report provides a direct comparison of hour-by-
3 hour blocking between CLEC and BellSouth trunk groups. Attachment 3B,
4 Item C.5.1 (TGP), shows the actual trunk blocking percentages by hour for
5 July 2001. The Analogue/Benchmark for the Trunk Group Performance
6 measure is any two-hour period in 24 hours where CLEC blockage exceeds
7 BellSouth blockage by more than 0.5%.

8
9 In May 2001, the CLEC blockage exceeded BellSouth retail by more than
10 0.5% for the eight and nine o'clock hours. A detailed analysis indicated that
11 one entire trunk group was out of service from just before 9:00 am until a few
12 minutes after nine on May 26, 2001. As confirmed by the CLEC, the CLEC
13 had scheduled a maintenance event without notifying BellSouth and took the
14 entire trunk group out of service. Without this outage, the trunk blockage
15 would have met the measurement criteria for May 2001. BellSouth met or
16 exceeded the retail analogue for this sub-metric in both June and July 2001.

17

18 **C. CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)**

19
20 This section addresses the measures associated with UNEs under checklist
21 item 2. Attachment 1B, Sections B1 – B3, provides data that is divided into
22 Ordering, Provisioning and Maintenance & Repair operations. The Ordering
23 function is disaggregated into 17 sub-metrics. The Provisioning function has

1 19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair
2 function. All Ordering measures will be included in this checklist item
3 because of the overall relationship of the mechanized, partially mechanized
4 and manual processing of Local Service Requests (LSRs). The Provisioning
5 and Maintenance & Repair measures for the following products are included
6 in the checklist item as shown below:

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

1	Switch Ports	#6 – Unbundled Local Switching
2	INP Standalone	#11 – Local Number Portability
3	LNP Standalone	#11 – Local Number Portability

4

5 An overall review of the UNE sub-metrics for Ordering, Provisioning,
6 Maintenance & Repair and Billing indicates that BellSouth met the
7 benchmark/analogue for 86% of the sub-metrics during May and June and
8 89% of the sub-metrics in July 2001.

9

10 During the three month period from May through July 2001, there were 123
11 UNE sub-metrics that had data for all three months and were compared to
12 benchmarks or retail analogues. Of those 123 sub-metrics, 93 met the
13 relevant criteria in all three months and another 12 sub-metrics met the
14 relevant criteria for two of the three months – 85% of the UNE sub-metrics
15 met or exceeded the relevant benchmarks or retail analogues in at least two
16 of the three months.

17

18 **1. UNE Ordering Measures**

19

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

1

2 **Percent Rejected Service Requests**

3 Results for individual CLECs in this measure vary. Some CLECs have few
4 rejected service requests, while some CLECs have many. Of the CLECs
5 submitting LSRs in May 2001, five of the seven CLECs that submitted the
6 largest volumes of fully mechanized LSRs had rejection rates ranging from
7 5% to 11%. In June 2001, three of the five CLECs that submitted the largest
8 volumes had rejection rates ranging from 5% to 7%, and in July 7 of the top
9 10 CLECs had 12% or less rejected electronic LSRs.

10

11 **Reject Interval**

12 Items B.1.4 - B.1.8 in Attachment 1B examine the Reject Interval for the
13 month of July 2001. For orders submitted electronically, the benchmark is
14 97% within one hour. In May, 62% of the rejected service requests were
15 delivered within the one-hour time period. 95% of the rejected service
16 requests met the one-hour benchmark in both June and July 2001.

17

18 For partially mechanized orders, which are LSRs submitted electronically and
19 require service representative intervention, the current benchmark is 85%
20 within 18 hours. In May, June and July 2001, BellSouth exceeded this
21 benchmark, with over 99%, 97% and 99% respectively, of partially
22 mechanized rejects being returned to the CLECs within the 18-hour time
23 period.

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For manual orders, the current benchmark is 85% within 24 hours. BellSouth also exceeded this requirement, with 92%, 99% and 95% of the LSRs submitted manually being returned to the CLECs within the 24-hour time period in May, June and July 2001, respectively.

The following sub-metrics did not meet the established benchmarks in May, June and/or July 2001:

Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3) (May/June/July)

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

BellSouth is conducting a detailed root cause analysis of the process for electronic rejects. This analysis addresses the ordering systems (EDI, TAG, and LENS) used by the CLECs and the back-end legacy applications, such as SOCS, that are accessed by the ordering systems.

Thus far, the analysis has determined that many of the LSRs that did not meet the one-hour benchmark were issued between 11:00 p.m. and 4:30 a.m. Between these hours, the system is unable to process LSRs because certain of the back-end legacy systems are out of service. LSRs submitted during these periods should be excluded from the measurement. BellSouth is currently reviewing the scheduled down time for all systems and how that down time affects the ordering capability of the CLECs.

1

2 With the implementation of May data, BellSouth was directed to change the
3 time stamp identification for the start and complete times of the interval for
4 this measurement from the Local Exchange Ordering (LEO) System to the
5 CLEC ordering interface system (TAG or EDI). However, with this change,
6 BellSouth is currently unable to identify multiple issues of the same version of
7 LSRs that have been rejected (fatal rejects). These rejected LSRs should be
8 excluded from the measurement. If there are multiple issues of the same
9 version, the measure currently calculates the interval from the initial issue to
10 the final issue of the LSR returned to the CLEC, Reject or FOC.
11 Consequently, BellSouth's performance level is inappropriately understated.
12 BellSouth is currently working to determine a fix for this issue.

13

14 With the May and June updates, the data for the UNE Loop & Port
15 Combination is included in the UNE Other Non-Design sub-metric. BellSouth
16 is currently changing the programming to remove the UNE Loop & Port
17 combination from the UNE Other Non-Design sub-metric and expects the
18 update to be complete with the release of August data.

19

20 Reject Interval / xDSL / Electronic (B.1.4.5) (July)

21 There were only four orders for this sub-metric in July 2001. Such a small
22 universe for this sub-metric does not provide a conclusive benchmark
23 comparison.

1

2 Reject Interval / Other Design / Electronic (B.1.4.14) (July)

3 There were only four orders for this sub-metric in July 2001. Such a small
4 universe for this sub-metric does not provide a conclusive benchmark
5 comparison.

6

7 Reject Interval / LNP (Standalone) / Electronic (B.1.4.17) (May)

8 BellSouth met the one hour benchmark for 54 of the 56 LSRs (96.43%)
9 rejected in this sub-metric for May 2001. The 97% benchmark allowed for
10 only one miss with this volume of LSRs.

11

12 Reject Interval / LNP (Standalone) / Electronic (B.1.4.17) (June)

13 Reject Interval / LNP (Standalone) / Partially Electronic (B.1.6.17) (June)

14 On June 2, 2001 an update was loaded in the LNP Gateway software. Due to
15 problems associated with this release, it had to be removed on June 10,
16 2001. Basically for the first 10 days of the month, this sub-metric had very
17 few of the LSRs rejected within the 18 hour benchmark. After the removal of
18 the software release, the majority of the LSRs that were rejected in this sub-
19 metric met the 18 hour benchmark. BellSouth met the benchmark
20 comparison for each of these sub-metrics in July 2001.

21

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

23 (May)

1 There were only six orders in this sub-metric for May 2001 with BellSouth
2 meeting the benchmark for five of them. Such a small universe does not
3 produce a statistically conclusive benchmark comparison. There was no
4 CLEC activity for this sub-metric in June or July 2001.

5

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

7 There were only six orders in this sub-metric for May 2001 with BellSouth
8 meeting the benchmark for five of them. Such a small universe does not
9 produce a statistically conclusive benchmark comparison. There was no
10 CLEC activity for this sub-metric in June 2001. BellSouth met the benchmark
11 comparison for this sub-metric in July 2001.

12

13 Reject Interval / xDSL / Manual (B.1.8.5) (May)

14 There were only three orders in this sub-metric for May 2001 with BellSouth
15 meeting the benchmark for two of them. Such a small universe does not
16 produce a statistically conclusive benchmark comparison. There was no
17 CLEC activity for this sub-metric in June 2001. BellSouth met the benchmark
18 comparison for this sub-metric in July 2001.

19

20 Reject Interval / INP (Standalone) / Manual (B.1.8.16) (July)

21 BellSouth met the 24-hour benchmark for 15 of the 18 orders in this sub-
22 metric in July 2001. The 85% benchmark required that 16 of the 18 rejects
23 be returned within the 24-hour period. The rejected LSRs taking longer

1 intervals did not exhibit any distinct patterns or reveal any ordering process
2 issues.

3

4 FOC Timeliness

5 For LSRs submitted electronically, the benchmark is 95% of the FOCs
6 returned within 3 hours. In July, BellSouth returned 1,611 FOCs for
7 electronically submitted LSRs with 98% meeting the 3-hour benchmark
8 interval. For partially mechanized LSRs, the benchmark is 85% returned
9 within 18 hours. BellSouth met the 18-hour benchmark for 98% of the 1,681
10 FOCs returned for partially mechanized LSRs. For LSRs submitted manually,
11 the benchmark is 85% returned within 36 hours. 97% of the FOCs for
12 manually submitted LSRs were returned within the 36-hour window. The sub-
13 metrics that did not meet the benchmark in May, June and/or July are as
14 follows:

15

16 FOC Timeliness / xDSL / Electronic (B.1.9.5) (July)

17 BellSouth met the 3-hour benchmark period for 61 of the 79 FOCs returned
18 for this sub-metric in July 2001. The FOCs taking longer intervals did not
19 exhibit any distinct patterns or reveal any ordering process issues.

20

21 FOC Timeliness / LNP (Standalone) / Electronic (B.1.9.17) (May/June)

22 BellSouth met the benchmark for 305 of the 350 LSRs for this sub-metric in
23 May 2001. In June 2001, BellSouth met the benchmark for 267 of the 321

1 LSRs. With the implementation of May data BellSouth was directed to
2 change the time stamp identification for the start and complete time of the
3 interval for this measurement from the Local Exchange Ordering (LEO)
4 System to the CLEC ordering interface system (TAG or EDI). With this
5 change BellSouth is unable to identify multiple issues of the same version of
6 the LSRs that may be rejected (fatal rejects), which should be excluded from
7 the measurement. If there are multiple issues of the same version, the
8 measure currently calculates the interval from the initial issue to the final
9 issue of the LSR returned to the CLEC, Reject or FOC. Consequently,
10 BellSouth's performance level is inappropriately understated. BellSouth met
11 the benchmark comparison for this sub-metric in July 2001.

12
13 FOC Timeliness / LNP (Standalone) / Manual (B.1.13.17) (June)

14 On June 2, 2001 an update was loaded in the LNP Gateway software. Due to
15 problems associated with this release, it had to be removed on June 10,
16 2001. Basically for the first 10 days of the month, this sub-metric had very
17 few of the LSRs confirmed within the 36 hour benchmark. After the removal
18 of the software release, the majority of the LSRs that were confirmed in this
19 sub-metric met the 36-hour benchmark. BellSouth met the benchmark
20 comparison for this sub-metric in July 2001.

21
22 FOC & Reject Response Completeness

1 This measurement was introduced with the March 2001 data month. The
2 benchmark is 95%. In this sub-metric, BellSouth did not meet the benchmark
3 in May, June and/or July 2001 for the FOC and Reject Response
4 Completeness metrics listed below:

5

6 FOC & Reject Response Completeness / Combo (Loop + Port) / Electronic
7 (B.1.14.3) (May/June/July)

8 FOC & Reject Response Completeness / xDSL / Electronic (B.1.14.5)
9 (May/June)

10 FOC & Reject Response Completeness / 2w Analog Loop Design /
11 Electronic (B.1.14.8) (May/June/July)

12 FOC & Reject Response Completeness / Other Design / Electronic
13 (B.1.14.14) (July)

14 FOC & Reject Response Completeness / Other Non-Design / Electronic
15 (B.1.14.15) (May/June)

16 FOC & Reject Response Completeness / xDSL / Partial Electronic (B.1.15.5)
17 (July)

18 FOC & Reject Response Completeness / Line Sharing / Manual (B.1.16.7)
19 (June)

20 FOC & Reject Response Completeness (Multiple Responses) / xDSL /
21 Electronic (B.1.17.5) (July)

22 FOC & Reject Response Completeness (Multiple Responses) / Local
23 Interoffice Transport / Partial Electronic (B.1.18.2) (May)

1 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
2 + Port) / Partial Electronic (B.1.18.3) (June)

3 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
4 Loop Design / Partial Electronic (B.1.18.8) (June)

5 FOC & Reject Response Completeness (Multiple Responses) / Other Design
6 / Partial Electronic (B.1.18.14) (May/July)

7 FOC & Reject Response Completeness (Multiple Responses) / Other Non
8 Design / Partial Electronic (B.1.18.15) (June)

9 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
10 + Port) / Manual (B.1.19.3) (June/July)

11 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
12 Loop Design / Manual (B.1.19.8) (May/June/July)

13 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
14 Loop Non Design / Manual (B.1.19.9) (May/July)

15 FOC & Reject Response Completeness (Multiple Responses) / Other Non
16 Design / Manual (B.1.19.15) (June)

17 BellSouth has determined that the coding for the FOC & Reject Response
18 Completeness measures failed to include rejections that were classified as
19 “auto clarifications.” This coding change, which is in the process of being
20 rewritten, is projected for completion with August data in late September and
21 will impact all FOC & Reject Completeness measures.

22

23 Flow-Through

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Attachment 1B, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated by customer type and for the Summary/Aggregate. Detailed flow-through results for individual CLECs are included in Attachment 2B. The following table shows the Regional Flow-Through results for May, June and July 2001 as compared with the Interim SQM benchmarks.

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

<u>Customer Type</u>	<u>May 2001</u>	<u>June 2001</u>	<u>July 2001</u>	<u>Benchmark</u>
Residence	90.25%	92.21%	87.09%	95%
Business	61.15%	57.26%	69.92%	90%
UNE	74.80%	78.33%	90.00%	85%
LNP	90.65%	91.83%	86.36%	85%

The table above excludes those LSRs designed to “fall out” for manual handling. The business flow-through rate is well below the 90% objective. Business LSRs are more complex than the typical LSRs and, as a result, there is a greater probability for error. For example, an LSR requesting 10 lines with series completion hunting that are located over multiple floors and have a variation of features on the lines presents many more opportunities for system mismatches than one that adds just lines and features.

1 BellSouth has established a Flow-Through Improvement Program
2 Management process that includes seven different internal organizations.
3 Ongoing analysis is being done to determine trends and identify flow-through
4 problems. To date, fifteen system enhancements have been identified and
5 are targeted for Encore releases. Three of the enhancements were
6 implemented in August. The remainder of the enhancements are scheduled
7 for release between October 2001 and January 2002.

8

9 **2. UNE Provisioning Measures**

10 BellSouth met 90% of the overall UNE Provisioning measurements in May,
11 78% in June and 87% in July 2001. The following sub-metrics did not meet
12 the applicable retail analogues in the months of May, June and/or July 2001:

13

14 % Jeopardy Notice Interval \geq 48 hours / Combo (Loop & Port) / $<$ 10

15 Circuits (B.2.10.3) (May/July)

16 The calculations for this measure have been determined to be incorrect. The
17 coding change in the Service Order Control System (SOCS) is currently
18 scheduled for a September 13, 2001, system load date. Based on this
19 schedule, the October data month will be the first full month that the change
20 will be in effect.

21

22 % Provisioning Troubles within 7 Days – Hot Cuts / UNE Loop Design /

23 Dispatch (B.2.17.1.1) (July)

1 There were only eight orders associated with this sub-metric in July 2001.
2 Such a small universe does not provide a conclusive benchmark comparison.

3

4 Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits / Non-
5 Dispatch (B.2.18.3.1.2) (July)

6 Missed Installation Appointments / Combo (Loop & Port) / < 10 Circuits /
7 Dispatch In (B.2.18.3.1.4) (July)

8 BellSouth met 2,024 of the 2,029 (99.75%) of the total CLEC installation
9 appointments scheduled for this sub-metric in July 2001. The 5 missed
10 appointments were in the “Dispatch In” disaggregation (1,295 met out of
11 1,300 scheduled, or 99.6%). When BellSouth provisions high quality service
12 coupled with very large universe sizes, it can cause an apparent out of equity
13 condition from a quantitative viewpoint. In these cases, there is very little
14 variation and the universe size is so large that the Z-test becomes overly
15 sensitive to any difference. In other words, the statistical test shows that the
16 measurement does not meet the fixed critical value when compared with the
17 retail analogue, but BellSouth’s actual performance for both CLECs and its
18 own retail operations is at a very high level – in this case over 99%. From a
19 practical point of view, the CLECs’ ability to compete has not been hindered
20 even though the statistical results may technically show that BellSouth failed
21 to meet the benchmark/analogue.

22

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

2 Dispatch (B.2.19.3.1.1) (June)

3 There were a total of 9 reports for the 66 orders that completed in the 30 days
4 prior to June 2001 for this sub-metric. There were no systemic problems
5 identified for this sub-metric in June. BellSouth met the retail analogue
6 comparison for this sub-metric in July 2001.

7

8 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /

9 Non-Dispatch (B.2.19.3.1.2) (July)

10 There were a total of 66 trouble reports for the 1,132 orders in this sub-metric
11 that completed in the 30 days prior to July 2001. No distinct patterns or
12 systemic problems were revealed in analyzing the data from these orders.

13

14 **Completion Notice Interval**

15 Item B.2.21 – B.2.22 of Attachment 1B provides data for the “Average
16 Completion Notice Interval” measurements. BellSouth did not meet the
17 required benchmarks/analogues on the following specific sub-metrics:

18

19 Average Completion Notice Interval / Combo (Loop & Port) / < 10 Circuits /

20 Dispatch (B.2.21.3.1.1) (June)

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

22 Non-Dispatch (B.2.21.3.1.2) (May)

1 The root cause analysis of these measures indicated that the only differences
2 between the performance comparing BellSouth retail and CLECs are the
3 mismatches found when the orders are compared with the original LSRs.
4 The start of the completion interval is the point at which the technician
5 completes the order, and the interval ends when the completion notice is
6 sent. Any change to a name, number of items, etc., occurring during the
7 provisioning process will generate inconsistencies with the original LSRs that
8 must be resolved before a final completion notice can be sent. Any time to
9 resolve these inconsistencies with the original LSRs is included in the
10 average. Because of numerous CLEC changes and order updates,
11 mismatches on CLEC orders exceed those for BellSouth retail orders.
12 Combining this with the smaller base for the CLECs' measurement raises the
13 average, which sometimes results in a miss. Specific Service
14 Representatives within the Work Management Centers have been assigned
15 to resolve any completion issues that are required. Providing specific training
16 and dedicating personnel to this task should reduce the difference between
17 the CLEC and retail analogue results.

18
19 Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch
20 (B.2.34.1.1.1) (May/June/July)

21 BellSouth met the standard for 28 of the 31 orders reviewed in this sub-metric
22 for May, 30 of the 33 orders in June and 19 of the 27 orders reviewed in July
23 2001. The 95% benchmark set requirements of 29, 31 and 26 for the months

1 of May, June and July, respectively, based on the monthly quantity of orders
2 for this sub-metric. BellSouth continues to focus on this measurement in
3 order to improve results to meet the benchmark.

4

5 Service Order Accuracy / Loops Non-Design / < 10 Circuits / Dispatch
6 (B.2.34.2.1.1) (May/June)

7 BellSouth met the standard for 46 of the 51 orders reviewed in this sub-metric
8 for May 2001. The 95% benchmark set a requirement of 48 based on the
9 quantity of orders for this sub-metric. BellSouth continues to focus on this
10 measurement. In June 2001 there were only 8 orders reviewed with
11 BellSouth meeting the criteria for 6 of them. Such a small universe does not
12 produce a statistically conclusive benchmark comparison. There was no
13 CLEC activity for this sub-metric in July 2001.

14

15 Service Order Accuracy / Loops Non Design / < 10 Circuits / Non Dispatch
16 (B.2.34.2.1.2) (June)

17 BellSouth met 25 of the 40 orders reviewed for this sub-metric in June 2001.
18 BellSouth continues to focus its efforts on meeting this measure. BellSouth
19 met the benchmark comparison for this sub-metric in July 2001.

20

21 BellSouth met all other UNE provisioning measures for the sub-metrics
22 included in this checklist item for May, June and July 2001.

23

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

2 BellSouth met the applicable performance standard for 88% for May, 86% for
3 June and 90% for July 2001 of the overall UNE M&R measurements. The
4 UNE M&R sub-metrics that did not meet the fixed critical value for this
5 checklist item are as follows:

6

7 Missed Repair Appointments / Other Design / Non-Dispatch (B.3.1.10.2)
8 (June)

9 BellSouth missed one of the eleven scheduled repair appointments for this
10 sub-metric in June 2001. Such a small universe does not produce a
11 statistically conclusive comparison with the retail analogue. There was no
12 CLEC activity for this sub-metric in July 2001.

13

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

16 The difference between the retail analogue and the CLEC aggregate was less
17 than 2% for this sub-metric in May and June 2001. Both the CLECs and
18 BellSouth retail had greater than 98% trouble free service for all in service
19 lines in this sub-metric in May. In May 2001, eleven of the twenty CLEC
20 troubles reported were due to a defective card problem within the central
21 office. There were 24 reports out of the 1,163 in service lines for this sub-
22 metric in June 2001. Nineteen of the 24 reports were due to facility problems

1 with the five remaining reports closed as no trouble found. BellSouth met the
2 retail analogue comparison for this sub-metric in July 2001.

3

4 Customer Trouble Report Rate / Other Design / Non Dispatch (B.3.2.10.2)
5 (May/June)

6 The difference between the retail analogue and the CLEC aggregate was less
7 than 2% for this sub-metric in May 2001 and less than 1% in June. Both the
8 CLECs and BellSouth retail had greater than 98% trouble free service for all
9 in service lines in this sub-metric in May and greater than 99% trouble free
10 service in June 2001. In May, seven of the seventeen troubles were closed as
11 test OK. Seven of the remaining ten troubles were due to the CLEC internally
12 changing the disconnect date but not sending in a change to BellSouth. All
13 seven orders had to be reestablished. In June 2001, there were a total of 11
14 reports for the 1,163 in service lines. Nine of the eleven reports were closed
15 as central office issues with the remaining two reports testing OK. BellSouth
16 met the retail analogue comparison for this sub-metric in July 2001.

17

18 Customer Trouble Report Rate / Other Non-Design / Non-Dispatch
19 (B.3.2.11.2) (May/June)

20 The difference between the retail analogue and the CLEC aggregate was less
21 than 3% for this sub-metric in May 2001 and less than 2% in June 2001. Both
22 the CLECs and BellSouth retail had greater than 97% trouble free service for
23 all in service lines in this sub-metric in May and June. In May, four of the

1 fourteen troubles were closed as test OK. The repair personnel are being
2 instructed to do more definitive testing before referring these troubles to the
3 field. In June 2001, there were 12 total reports with 6 being closed as test
4 OK. The remaining 6 reports did not indicate any systemic pattern. BellSouth
5 met the retail analogue comparison for this sub-metric in July 2001.

6

7 Maintenance Average Duration / Other Design / Non Dispatch (B.3.3.10.2)
8 (June)

9 There were a total of 11 reports included in this sub-metric for June 2001. No
10 systemic problem was identified in the analysis. There was no CLEC activity
11 for this sub-metric in July 2001.

12

13 % Repeat Troubles within 30 Days / Other Non-Design / Non-Dispatch
14 (B.3.4.11.2) (July)

15 There were only 3 trouble reports for this sub-metric in July 2001. Such a
16 small universe does not provide a statistically conclusive comparison with the
17 retail analogue.

18

19 Out of Service > 24 hours / Other Design / Non-Dispatch (B.3.5.10.2) (June)

20 There was only one trouble that was out of service greater than 24 hours for
21 this sub-metric in June 2001. Such a small universe does not produce a
22 statistically conclusive comparison with the retail analogue. There was no
23 CLEC activity for this sub-metric in July 2001.

1

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

3 (May)

4 There were only two reports in this sub-metric for May 2001 with one of them
5 being out of service greater than 24 hours. Such a small universe does not
6 produce a statistically conclusive comparison with the retail analogue.
7 BellSouth met or exceeded the retail analogue for this sub-metric in both June
8 and July 2001.

9

10 **4. Other UNE Measures**

11

12 **Pre-Ordering**

13 Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1.1) and
14 Loop Makeup Electronic (F.2.2.1) are included in the Pre-Ordering
15 measurements. All measures met the established benchmarks for May, June
16 and July 2001.

17

18 **Operations Support Systems**

19 The OSS/Preordering measures for which BellSouth did not meet the
20 benchmark/retail analogue in May, June and/or July 2001 were:

21

22 Average Response Interval – CLEC (LENS) / HAL / CRIS / Region / RNS

23 (D.1.3.5.1) (May/June/July)

1 Average Response Interval – CLEC (LENS) / HAL / CRIS / Region / ROS

2 (D.1.3.5.2) (May/June/July)

3 A detailed analysis has identified a problem in the LENS software that deals
4 with response times from HAL/CRIS. This was corrected in an update
5 released on July 28, 2001.

6

7 Average Response Interval – CLEC (TAG) / HAL / CRIS / Region / RNS

8 (D.1.4.7.1) (July)

9 Average Response Interval – CLEC (TAG) / HAL / CRIS / Region / ROS

10 (D.1.4.7.2) (May/June/July)

11 BellSouth is currently investigating the results for July. There was basically,
12 one tenth of one percent difference for this measure between the CLEC and
13 retail results.

14

15 Average Response Interval / CRIS / Region (D.2.4.1.1) (May/June/July)

16 The average response interval for this sub-metric is measured in three
17 separate disaggregations -- the percentage of queries that are responded to
18 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

19 The average response interval for the CLEC requests did not meet the retail
20 analogue intervals for the less than 4-second disaggregation but exceeded
21 both the less than 10 and greater than 10 seconds responses. For the 4-
22 second interval, there was only approximately 1% difference between the
23 CLEC responses as compared with the retail analogue in all three months.

1 For the less than 10 second response interval, the CLECs received over 99%
2 of their responses while the retail analogue received slightly less than 99%.
3 Similarly, for the greater than 10 seconds interval measure, the CLECs
4 received less than 1% of responses in the longer interval while the BellSouth
5 retail analogue received just over 1% of responses in over 10 seconds.
6 These very small differences in response intervals indicate equivalent service
7 levels for the CLECs and BellSouth retail.

8

9 Average Response Interval / DLETH / Region (D.2.4.2.1) (June)

10 The average response interval for this sub-metric is measured in three
11 separate intervals. The percentage of queries that are responded to in less
12 than 4 seconds, less than 10 seconds and greater than 10 seconds. In June
13 2001, the average response interval for the CLEC requests did not meet the
14 retail analogue intervals for the less than 4-second disaggregation but
15 exceeded both the less than 10 and greater than 10 seconds responses. In
16 July 2001, BellSouth exceeded the retail analogue comparison for all three
17 measurement categories.

18

19 Average Response Interval / LMOS / Region (D.2.4.4.1, D.2.4.4.2, D.2.4.4.3)

20 (July)

21 The average response intervals for these sub-metrics are measured in three
22 separate disaggregations -- the percentage of queries that are responded to
23 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.

1 For all three measurements, the results are virtually identical, with the less
2 than 4 seconds measure having a difference of 0.03%, the less than 10
3 seconds interval and the greater than 10 second interval having differences of
4 only 0.01%. These results indicate equivalent service levels for both the
5 CLECs and BellSouth retail.

6

7 Average Response Interval / LMOSupd / Region (D.2.4.5.1, D.2.4.5.2,
8 D.2.4.5.3) (May/June/July)

9 The average response interval for this sub-metric is measured in three
10 separate disaggregations. The percentage of queries that are responded to
11 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
12 The average response interval for the CLEC requests did not meet the retail
13 analogue intervals for all three of these sub-metrics in May, June or July
14 2001. For each of the three sub-metrics, there was less than a 1% difference
15 in the responses received by the CLECs and BellSouth retail in each month.
16 The one percent difference for all of these intervals indicates equivalent
17 service levels for both the CLECs and BellSouth retail.

18

19 Average Response Interval / LNP/ Region (D.2.4.6.1) (May/June/July)

20 The average response interval for this sub-metric is measured in three
21 separate disaggregations -- the percentage of queries that are responded to
22 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
23 In all three months, the average response interval for the CLEC requests did

1 not meet the retail analogue intervals for the less than 4-second
2 disaggregation but exceeded both the less than 10 and greater than 10
3 seconds responses. In May 2001, the CLEC response interval was 99.28%
4 within 4 seconds as compared with 99.62% for the retail analogue. For the
5 less than 10 second response, the CLECs received 99.84% of their
6 responses and the retail analogue received 99.84%. In June 2001, the CLEC
7 response interval was 98.78% within 4 seconds as compared with 99.35% for
8 the retail analogue. For the less than 10 second response, the CLECs
9 received 99.67% of their responses and the retail analogue received 99.67%.
10 Similarly, in July 2001, both the CLECs and BellSouth retail received over
11 99.4% of responses in less than 4 seconds and less than 0.2% in more than
12 10 seconds. The less than one-half percent difference for these intervals
13 indicates equivalent service levels for the CLECs and BellSouth retail.

14
15 Average Response Interval / OSPCM / Region (D.2.4.8.1) (July)

16 The average response interval for this sub-metric is measured in three
17 separate disaggregations -- the percentage of queries that are responded to
18 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.
19 In July 2001, the average response interval for the CLEC requests did not
20 meet the retail analogue intervals for the less than 4-second disaggregation
21 but met the standard for both the less than 10 and greater than 10 seconds
22 responses. In July, the CLEC response interval was 34.75% within 4
23 seconds as compared with 45.00% for the retail analogue. For the less than

1 10 second response interval, the CLECs received 96.61% of their responses
2 and the retail analogue received 97.54%. With an activity level of only 118
3 requests from this system for the month, 12 additional responses within 4
4 seconds would have brought the sub-metric into parity with the retail
5 analogue.

6

7 **General – Billing**

8 Usage Data Delivery Accuracy (F.9.1) (May)

9 This measure compares the rate at which usage data is sent accurately to
10 CLECs with the same measure for the BellSouth retail analogue. In May
11 2001, a software problem caused an error for one CLEC which dropped the
12 results to 99.99% compared to BellSouth's 100%. Out of approximately
13 14,000 packs (or groupings) of usage data sent to CLECs in May, only one of
14 the packs was impacted by the problem. Once the software was fixed, the
15 corrected pack data was resent successfully to the CLEC. BellSouth met or
16 exceeded the retail analogue for this sub-metric in both June and July 2001.

17

18 Usage Data Delivery Timeliness (F.9.2) (July)

19 This measure tracks the percentage of usage data delivered within six
20 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs
21 experienced usage data delivery timeliness rates that were slightly lower than
22 the rates for BellSouth customers during July 2001 (98.95% for BellSouth
23 versus 96.62% for CLECs). The difference in performance was the result of

1 some input files being left out of the ADUF job for 4 cycles before the files
2 were recovered and processed. It is important to point out that the CLEC
3 result of 96.62% still provides the CLECs a meaningful opportunity to
4 compete. BellSouth has developed a fix that should prevent this type of error
5 from occurring in the future. The fix will be implemented by September 1,
6 2001.

7

8 Mean Time to Deliver Usage (F.9.4) (May/July)

9 This measure compares the average number of days to deliver usage to
10 CLECs with the BellSouth retail analogue. In May 2001, the CLEC result was
11 3.76 days compared to BellSouth's 3.73 days. In July 2001, the BellSouth
12 result was 3.37 days compared to the CLEC result of 3.83 days as a result of
13 some input files being left out of the ADUF job for 4 cycles. While the CLEC
14 measurement is slightly greater than the BellSouth results, the CLECs are
15 provided with substantially the same opportunity to bill end users as is
16 BellSouth. BellSouth met or exceeded the retail analogue for this sub-metric
17 in June 2001.

18

19 Recurring Charge Completeness / UNE (F.9.5.2) (July)

20 BellSouth is currently investigating this measure to determine the root cause
21 and any corrective action to be taken to correct any issues leading to the
22 performance results.

23

1 Recurring Charge Completeness / Interconnection (F.9.5.3) (July)

2 BellSouth is currently investigating this measure to determine the root cause
3 and any corrective action to be taken to correct any issues leading to the
4 performance results.

5

6 Non-Recurring Charge completeness / Interconnection (F.9.6.3) (July)

7 This measure tracks the ability of the ordering and billing systems to begin
8 billing a CLEC non-recurring charges for local interconnection services on the
9 next invoice after an order has "completed". A benchmark of 90% has been
10 set as the level of performance to meet. In July 2001, BellSouth's
11 performance was 40.86%. This measure missed the benchmark because of
12 problems encountered in correcting service order errors in a timely manner.

13

14 **General - Change Management**

15 % Software Release Notices Sent On Time (F.10.1) (May)

16 There were only four releases in this sub-metric for May 2001 with BellSouth
17 meeting the benchmark for three of them. Such a small universe does not
18 produce a statistically conclusive benchmark comparison. BellSouth met or
19 exceeded the benchmark for this sub-metric in June 2001. There was no
20 activity for this sub-metric in July 2001.

21

22 % Change Management Documentation Sent On Time (F.10.3) (July)

23 Average Documentation Release Delay Days (F.10.5) (July)

1 Two of the four change management documentation letters issued in July
2 2001 were released with less than the 30-day benchmark window. Both of
3 these letters were, however, primarily dealing with clarifications and
4 information on existing documentation and/or business rules and did not
5 require CLEC coding changes.

6

7 **General – New Business Requests**

8 % Quotes Provided in 10 Business Days (F.11.2.1) (June/July)

9 There were only two requests processed in June and three requests in July
10 2001 in sub-metric F.11.2.1. Such a small universe does not provide a
11 statistically conclusive benchmark comparison. This is a regional measure
12 and none of the requests were processed in Kentucky.

13

14 **General – Ordering**

15 % Acknowledgement Message Timeliness / EDI (F.12.1.1) (May)

16 A root cause analysis has identified 8,856 of 10,010 (88%) failed EDI
17 acknowledgements were submitted by the Florida Third Party Test CLEC and
18 are not being filtered out of the acknowledgement calculations. With the
19 removal of these test messages the results would have been 98.8%, well
20 above the 90% benchmark for this sub-metric in May 2001. BellSouth met or
21 exceeded the retail analogue for this sub-metric in both June and July 2001.

22

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

2 (May/June/July)

3 BellSouth experienced EDI outages in May and June that caused less than
4 3% of the acknowledgement messages not be returned. A Stability Plan to
5 improve EDI availability has been put into effect. This plan includes
6 implementing both a manual application monitoring schedule (24 / 7) and
7 increased mechanized application alarms to more adequately monitor and
8 react to application outages. The database parameters have also been
9 adjusted to allow for maximum processing in the EDI system. In July 2001,
10 problems occurred on only 39 (0.05%) of the total 78,663 messages returned
11 in this sub-metric.

12

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

14 (May/June/July)

15 BellSouth failed to deliver 16 of the 183,966 messages in May, 51 of the
16 127,390 messages in June and 485 of the 194,073 messages in July 2001 for
17 this sub-metric. Analysis continues to identify any issues in this process.
18 However, such a small number of failed records have not revealed any
19 systemic process problems.

20

21 **General – Network Outage Notification**

22 Mean Time to Notify CLEC of Network Outage (F.14.1) (June)

1 BellSouth did not meet the retail analogue for this sub-metric in June 2001.
2 Due to an undetected E-mail failure, one of the three CLEC notifications did
3 not get delivered. This interval was over 6,000 minutes that ran from June
4 26th when the outage occurred, until the end of the data month. BellSouth is
5 reviewing its procedures to eliminate this type of occurrence. BellSouth met
6 or exceeded the retail analogue comparison for this sub-metric in July 2001.

7

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

9 As discussed in Checklist Item 2, Sections B.2 and B.3 of Attachment 1B
10 provide data for provisioning and maintenance & repair measures for
11 unbundled local loops.

12

13 For purposes of discussion in this checklist item, the local loop sub-metrics
14 have been separated into two mode-of-entry groups, xDSL and
15 SL1/SL2/Digital. The xDSL group includes xDSL (ADSL, HDSL, UCL), ISDN
16 and Line Sharing sub-metrics. The SL1/SL2/Digital group includes the design
17 and non-design 2-wire analog loops, as well as the 2-wire and 4-wire digital
18 loop sub-metrics.

19

20 **xDSL Group**

21

22 **1. Provisioning Measures**

1 BellSouth met all the provisioning sub-metrics in this checklist item for the
2 month of May 2001. In June and July 2001, there was one provisioning sub-
3 metric that did not meet the retail analogue and it is as follows:

4

5 % Provisioning Troubles w/i 30 Days / UNE ISDN / < 10 Circuits / Dispatch
6 (B.2.19.6.1.1) (June/July)

7 There were 2 troubles reported for the 26 orders that completed in the 30
8 days prior to June and 5 troubles reported for the 36 orders completed in the
9 30 days prior to July 2001 for this sub-metric. There was no systemic
10 problem identified for the troubles that were analyzed in either June or July.

11

12 **2. Maintenance & Repair Measures**

13

14 Missed Repair Appointments / UNE ISDN / Non-Dispatch (B.3.1.6.2) (July)

15 There were only four orders associated with this sub-metric in July 2001.
16 Such a small universe for this sub-metric does not provide a statistically
17 conclusive comparison to the retail analogue.

18 Customer Trouble Report Rate / xDSL Loops / Non Dispatch (B.3.2.5.2) (May
19 /June)

20 The CLEC aggregate only reported three troubles for this sub-metric in May
21 and June 2001. Both the CLECs and BellSouth retail had greater than 99%
22 trouble free service for all in service lines in this sub-metric in May and June.
23 BellSouth met the retail analogue for this sub-metric in July 2001.

1

2 Customer Trouble Report Rate / ISDN Loops / Dispatch (B.3.2.6.1) (May/July)

3 The CLEC aggregate only reported two troubles for this sub-metric in May
4 and 15 troubles in July 2001. Both the CLECs and BellSouth retail had
5 greater than 99% trouble free service for all in service lines in this sub-metric
6 in May and over 97% trouble free service in July. BellSouth met or exceeded
7 the retail analogue for this sub-metric in June 2001.

8

9 Customer Trouble Report Rate / Line Sharing / Non Dispatch (B.3.2.7.2)
10 (May/June/July)

11 The CLEC aggregate only reported one trouble for this sub-metric in May,
12 three in June and eight troubles in July 2001. Both the CLECs and BellSouth
13 retail had greater than 99% trouble free service for all in service lines in this
14 sub-metric in May and June and over 95% trouble free service in July.

15

16 Maintenance Average Duration / ISDN Loops / Non Dispatch (B.3.3.6.2)
17 (June/July)

18 There were only a total of three troubles reported for this sub-metric in June
19 and 4 troubles reported in July 2001. Such a small universe does not
20 produce a statistically conclusive comparison with the retail analogue.

21

22 % Repeat Troubles in 30 Days / UNE ISDN / Non-Dispatch (B.3.4.6.2) (June)

1 There were only a total of three troubles reported for this sub-metric in June
2 2001. Such a small universe does not produce a statistically conclusive
3 comparison with the retail analogue. BellSouth met the retail analogue for
4 this sub-metric in July 2001.

5

6 Out of Service > 24 Hours / xDSL / Dispatch (B.3.5.1) (July)

7 There were only four orders associated with this sub-metric in July 2001.
8 Such a small universe for this sub-metric does not provide a statistically
9 conclusive comparison to the retail analogue.

10

11 Out of Service > 24 Hours / UNE ISDN / Non-Dispatch (B.3.6.2) (July)

12 There were only four orders associated with this sub-metric in July 2001.
13 Such a small universe for this sub-metric does not provide a statistically
14 conclusive comparison to the retail analogue.

15

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

17

18 BellSouth met all sub-metrics for this group in May 2001. There were a total
19 of three provisioning sub-metrics that did not meet the retail analogue for this
20 group in June and/or July 2001. Those sub-metrics are as follows:

21

22 % Missed Installation Appointments / Digital Loops < DS1 / < 10 Circuits /
23 Dispatch (B.2.18.18.1.1) (June)

1 There were 2 missed appointments for the 36 scheduled orders for this sub-
2 metric in June 2001. There was no systemic pattern for either of these two
3 items. BellSouth met the retail analogue for this sub-metric in July 2001.

4

5 % Provisioning Troubles w/i 30 Days / Digital Loops < DS1 / < 10 Circuits /
6 Dispatch (B.2.19.18.1.1) (June/July)

7 There were 2 troubles reported for the 26 orders that completed in the 30
8 days prior to June and 6 troubles reported for the 58 orders that completed in
9 the 30 days prior to July 2001 for this sub-metric. There were no systemic
10 problems identified for the troubles that were analyzed in either June or July.

11

12 % Provisioning Troubles w/i 30 Days / Digital Loops >= DS1 / < 10 Circuits /
13 Dispatch (B.2.19.19.1.1) (June)

14 There was 1 trouble reported for the 40 orders that completed in the 30 days
15 prior to June 2001 for this sub-metric. There was no systemic problem
16 identified for the one trouble that was analyzed in June.

17

18 Average Completion Notice Interval / 2w Analog Loops – Design / < 10
19 Circuits / Dispatch (B.2.21.8.1.1) (July)

20 There were on 10 completions in this sub-metric in July 2001 for this sub-
21 metric. There was no systemic problem identified for the completions
22 analyzed in July.

23

1 **E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT**

2
3 The data in these measures indicate that BellSouth met the
4 benchmark/analogue requirements for all measurements in Checklist Item 5
5 for May, June and July 2001.

6
7
8 **F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING**

9
10 The data in these measures indicate that BellSouth met the
11 benchmark/analogue requirements for all measurements in Checklist Item 6
12 for May, June and July 2001.

13
14 **G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES**

15 **H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR**
16 **SERVICES**

17
18 As indicated in Attachment 1B, Sections F.6, F.7 and F.8, BellSouth met the
19 benchmark/analogue requirements of Checklist Items 7a and 7b in July 2001,
20 as it had in both May and June. Even though BellSouth tracks and reports
21 these measures, the processes used in providing these services are designed
22 to provide parity for all users.

23

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

2 **SIGNALING**

3 BellSouth met the required benchmarks for three of the four sub-metrics
4 associated with this checklist item in both May and July 2001. All sub-metrics
5 met the benchmarks in June 2001. See items F.13.3.1 through F.13.3 in
6 Attachment 1B for further details. The one item that did not meet the
7 appropriate benchmark in May and July 2001 is as follows:

8
9 **% NXXs / LRNs Loaded by LERG Effective Date (Region) (F.13.3) (May/July)**

10 The measure indicated that only 21 of the 33 NXXs were loaded by their
11 effective date for the entire BellSouth region in May 2001 and 216 of 218
12 NXXs loaded by their effective date in July. There were, however, no missed
13 dates in Kentucky for this sub-metric in either May or July. BellSouth met or
14 exceeded the benchmark for this sub-metric in June 2001.

15
16 **I. CHECKLIST ITEM 11 – NUMBER PORTABILITY**

17
18 All the measurements in this Checklist Item were met or exceeded for May,
19 June and/or July 2001 except for the following:

20
21 **Order Completion Interval / LNP (Standalone) / < 10 Circuits / Non-Dispatch**
22 **(B.2.1.17.1.2) (May/June)**

1 The unadjusted order completion interval for May was 2.40 days compared to
2 the retail analogue of 1.03 days. In June 2001, the unadjusted order
3 completion interval was 2.32 days compared to the retail analogue of 0.86
4 days. A root cause analysis for OCI for Non-Dispatch orders revealed that
5 BellSouth was offering a 0 to 2-day interval on retail non-dispatched POTS
6 orders, but the wholesale orders were incorrectly receiving the same longer
7 interval as “dispatched” orders. BellSouth is currently reviewing the
8 programming change to correct this issue.

9

10 In addition to the appointment interval issue, OCI is adversely affected by
11 LSRs for which CLECs request intervals beyond the offered interval, and an
12 “L” code is not entered on the order. When a CLEC requests an interval
13 beyond the normal interval offered by BellSouth, an “L” code should be
14 entered on the service order. “L” coded orders are excluded from the OCI
15 metrics. BellSouth met the retail analogue comparison for this sub-metric in
16 July 2001.

17

18 Order Completion Interval / LNP (Standalone) / >= 10 Circuits / Non-
19 Dispatch (B.2.1.17.2.2) (July)

20 There were only three orders for this sub-metric in July 2001. Such a small
21 universe does not provide a statistically conclusive comparison to the retail
22 analogue.

23

1 % Missed Installation Appointments / LNP (Standalone) / < 10 Circuits / Non-
2 Dispatch (B.2.18.17.1.2) (June/July)

3 BellSouth missed 2 of the 1,126 orders scheduled for this sub-metric in June
4 and 3 of the 528 orders scheduled in July 2001. The CLECs and BellSouth
5 retail had over 99.4% of all orders completed as scheduled in both June and
6 July.

7

8 Average Completion Notice Interval / LNP (Standalone) / < 10 Circuits / Non-
9 Dispatch (B.2.21.17.1.2) (May/June/July)

10 The root cause analysis of these measures indicated that the only differences
11 between the performance comparing BellSouth retail and CLECs are the
12 mismatches found when the orders are compared with the original LSRs.
13 The start of the completion interval is the point at which the technician
14 completes the order, and the interval ends when the completion notice is
15 sent. Any change to a name, number of items, etc., occurring during the
16 provisioning process will generate inconsistencies with the original LSRs that
17 must be resolved before a final completion notice can be sent. Any time to
18 resolve these inconsistencies with the original LSRs is included in the
19 average. Because of numerous CLEC changes and order updates,
20 mismatches on CLEC orders exceed those for BellSouth retail orders.
21 Combining this with the smaller base for the CLECs' measurement raises the
22 average, which sometimes results in a miss. Specific Service
23 Representatives within the Work Management Centers have been assigned

1 to resolve any completion issues that are required. Providing specific training
2 and dedicating personnel to this task should reduce the difference between
3 the CLEC and retail analogue results.

4

5 Disconnect Timeliness / LNP / < 10 Circuits (B.2.31.1) (May/June)

6 The Disconnect Timeliness measure is supposed to track the time it takes to
7 disconnect a number in the central office switch after the message has been
8 received from the Local Number Portability (LNP) Gateway that it is ready.
9 However, this measurement does not track the relevant time to perform this
10 function.

11

12 On a great majority of LNP orders, BellSouth creates what is referred to as a
13 “trigger” in conjunction with the order. This trigger gives the end user
14 customer the ability to make and receive calls from other customers who are
15 served by the customer’s host switch at the time of the LNP activation. This
16 ability is not dependent upon BellSouth working a disconnect order in the
17 central office switch. In other words, when a trigger is involved, an end user
18 customer can receive calls from other customers served by the same host
19 switch before the disconnect order is ever worked.

20

21 As it currently exists, Performance Measure P-11 does not recognize the
22 importance of triggers and their effect on the LNP process. Rather, the
23 current measure calculates the end time of the LNP activity as the processing

1 of the actual disconnect order in the host switch, even though, from a
2 customer's perspective, this activity is totally meaningless on most LNP
3 orders. It is the activation of the LNP and the routing function accomplished
4 by the LSMS that ultimately determines whether the end user is back in full
5 service and is able to make and receive calls when a trigger is used in porting
6 a telephone number. So, while BellSouth may be missing this measure, the
7 actual impact on CLECs and their end users, for a great majority of the orders
8 is minimal, or nonexistent.

9

10 BellSouth is pursuing a change in this measure that more accurately reflects
11 the LNP process and its impacts on end users. Three additional measures
12 are being reviewed as potential replacements for this measure.

13

14

K. CHECKLIST ITEM 14 – RESALE

15 BellSouth has met or exceeded the benchmarks/analogues for 82%, 90% and
16 89% of the resale metrics for May, June and July 2001, respectively. The
17 details are delineated in Attachment 1B, Items A.1.1.1.1 through A.4.2.

18

19 During the three month period from May through July 2001, there were 99
20 Resale sub-metrics that had data for all three months and were compared to
21 benchmarks or retail analogues. Of those 99 sub-metrics, 74 met the
22 relevant criteria in all three months, and another 18 sub-metrics met the
23 relevant criteria for two of the three months – 93% of the UNE sub-metrics

1 met or exceeded the relevant benchmarks or retail analogues in at least two
2 of the three months.

3

4 **1. Resale Ordering Measures**

5 **FOC Timeliness**

6 For the month of May 2001, BellSouth processed approximately 9,972 Resale
7 LSRs in Kentucky and met the relevant benchmark on 99% of all FOCs. Of
8 the 9,972 LSRs, 8,842 were fully mechanized with 99% meeting the 3-hour
9 benchmark, clearly exceeding the 95% target. In June 2001, BellSouth
10 processed approximately 8,351 Resale LSRs and met the relevant
11 benchmark on 99% of all FOCs. Of the 8,351 LSRs, 7,123 were fully
12 mechanized with 99% meeting the 3-hour benchmark. In July 2001, 7,879
13 FOCs were returned for Resale LSRs with 98% meeting the relevant
14 benchmark. Of the 6,791 FOCs returned for electronically submitted LSRs,
15 99% were returned within the 3-hour benchmark interval. See Attachment
16 1B, Sections A.1.9 through A.1.13 for further details.

17

18 **Reject Interval**

19 During the month of May 2001, there were 1,411 rejected LSRs, either
20 mechanically or manually processed, with 92% meeting the benchmark. The
21 benchmark for electronic rejects is 97% within 1 hour. 62% of all orders were
22 processed electronically, and 88% met the 1-hour benchmark. In June 2001,
23 there were 1,155 rejected LSRs, either mechanically or manually processed,

1 with 97% meeting the benchmark. The benchmark for electronic rejects is
2 97% within 1 hour. 56% of all orders were processed electronically, and 97%
3 met the 1-hour benchmark. In July 2001, 1,343 LSRs were rejected, with 98%
4 returned within the relevant benchmark period. Of the LSRs rejected in July,
5 64% were submitted electronically with 98% returned within the 1-hour
6 benchmark. See Attachment 1B, Items A.1.4 through A.1.8 for further details.

7

8 The Ordering sub-metrics for which BellSouth did not meet the
9 benchmarks/analogues for May, June and/or July 2001 were:

10

11 Reject Interval / Residence / Electronic (A.1.4.1) (May/June)

12 Reject Interval / Business / Electronic (A.1.4.2) (May)

13 The current benchmark for these two sub-metrics is $\geq 97\%$ within one hour.
14 With the implementation of May data BellSouth was directed to change the
15 time stamp identification for the start and complete times of the interval for
16 this measurement from the Local Exchange Ordering (LEO) System to the
17 CLEC ordering interface system (TAG or EDI). With this change BellSouth
18 was unable to identify multiple issues of the same version of the LSRs that
19 may be rejected (fatal rejects), which should be excluded from the
20 measurement. If there are multiple issues of the same version, the measure
21 currently calculates the interval from the initial issue to the final issue of the
22 LSR returned to the CLEC, Reject or FOC. Consequently, BellSouth's

1 performance level is inappropriately understated. BellSouth is currently
2 working to determine a fix for this issue.

3
4 BellSouth is conducting a detailed root cause analysis of the process for
5 electronic rejects. This analysis addresses the ordering systems (EDI, TAG,
6 and LENS) used by the CLECs and the back-end legacy applications, such
7 as SOCS, that are accessed by the ordering systems.

8
9 Thus far, the analysis has determined that many of the LSRs that did not
10 meet the one-hour benchmark were issued between 11:00 p.m. and 4:30 a.m.
11 Between these hours the system is unable to process LSRs because of the
12 back-end legacy systems are out of service. Such hours should be excluded
13 from the measurement. BellSouth is currently reviewing the scheduled down
14 time for all systems and how that down time affects the ordering capability of
15 the CLECs.

16
17 BellSouth met the benchmark comparison for both of these sub-metrics in
18 July 2001.

19
20 Reject Interval / Design (Specials) / Manual (A.1.8.3) (July)

21 There were only 3 orders associated with this sub-metric in July 2001. Such
22 a small universe does not provide a statistically conclusive benchmark
23 comparison.

1

2 Reject Interval / PBX / Manual (A.1.8.4) (July)

3 There were only 4 orders associated with this sub-metric in July 2001. Such
4 a small universe does not provide a statistically conclusive benchmark
5 comparison.

6

7 FOC Timeliness / PBX / Manual (A.1.13.4) (July)

8 There were only 6 orders associated with this sub-metric in July 2001. Such
9 a small universe does not provide a statistically conclusive benchmark
10 comparison.

11

12 FOC Timeliness / ISDN / Manual (A.1.13.6) (May/July)

13 There were only 4 orders in this sub-metric for May and also 4 orders in July
14 2001 with BellSouth meeting the benchmark for three of them in each of
15 these months. Such a small universe does not produce a statistically
16 conclusive benchmark comparison. BellSouth met or exceeded the
17 benchmark for this sub-metric in June 2001.

18

19 FOC Reject & Response Completeness / Residence / Electronic (A.1.14.1)
20 (July)

21 FOC Reject & Response Completeness / Business / Electronic (A.1.14.2)
22 (May/June/July)

- 1 FOC Reject & Response Completeness / Design / Electronic (A.1.14.3)
- 2 (June)
- 3 FOC Reject & Response Completeness / Residence / Manual (A.1.16.1)
- 4 (May)
- 5 FOC Reject & Response Completeness / Business / Manual (A.1.16.2)
- 6 (May/June/July)
- 7 FOC Reject & Response Completeness / Business / Manual (A.1.16.3) (June)
- 8 FOC Reject & Response Completeness / PBX / Manual (A.1.16.4) (July)
- 9 FOC Reject & Response Completeness / Centrex / Manual (A.1.16.5) (July)
- 10 FOC Reject & Response Completeness / ISDN / Manual (A.1.16.6)
- 11 (May/July)
- 12 FOC Reject & Response Completeness (Multiple Responses) / Residence /
- 13 Partially Electronic (A.1.18.1) (May/July)
- 14 FOC Reject & Response Completeness (Multiple Responses) / Business /
- 15 Partially Electronic (A.1.18.2) (May/June/July)
- 16 FOC Reject & Response Completeness (Multiple Responses) / Residence /
- 17 Manual (A.1.19.1) (May/June/July)
- 18 FOC Reject & Response Completeness (Multiple Responses) / Business /
- 19 Manual (A.1.19.2) (May/June)
- 20 FOC Reject & Response Completeness (Multiple Responses) / Design /
- 21 Manual (A.1.19.3) (June)
- 22 FOC Reject & Response Completeness (Multiple Responses) / PBX / Manual
- 23 (A.1.19.4) (June)

1 FOC Reject & Response Completeness (Multiple Responses) / Centrex /

2 Manual (A.1.19.5) (July)

3 FOC Reject & Response Completeness (Multiple Responses) / ISDN /

4 Manual (A.1.19.6) (June)

5 BellSouth has determined that the coding for the FOC & Reject
6 Completeness measures failed to include rejections that were classified as
7 “auto clarifications.” This coding change, which is in the process of being
8 rewritten, is projected for completion with August data in late September and
9 will impact all FOC & Reject Completeness measures.

10

11 **2. Resale Provisioning Measures**

12

13 BellSouth met or exceeded the benchmark or retail analogue for 86% of all
14 resale provisioning measures in May, 85% in June and 91% in July 2001.

15 The details supporting the July percentage are delineated in Items A.2.1.1.1
16 through A.2.20.6.2.2 of Attachment 1B.

17

18 **Order Completion Interval**

19 As discussed Checklist Item 11, the failure to properly “L” code appropriate
20 orders and the missed appointments for customer reasons negatively impacts
21 the OCI measurements. The following are the sub-metrics for which
22 BellSouth did not meet the retail analogue in May, June and/or July 2001:

23

1 Order Completion Interval / Residence / < 10 Circuits / Non-Dispatch

2 (A.2.1.1.1.2) (May/June)

3 The unadjusted order completion interval for May was 1.69 days compared to
4 the retail analogue of 1.02 days. In June the unadjusted order completion
5 interval was 0.97 days compared to the retail analogue of 0.85 days. As
6 explained in the Order Completion Interval section for Checklist Item 11,
7 BellSouth has determined that non-dispatched orders were given the
8 dispatched interval in error. BellSouth met the retail analogue comparison
9 for this sub-metric in July 2001.

10

11 Order Completion Interval / Centrex / < 10 Circuits / Non-Dispatch

12 (A.2.1.5.2.2) (May)

13 There were only three orders in this sub-metric for May 2001. The small
14 universe for this measurement does not provide a statistically conclusive
15 comparison to the retail analogue. BellSouth met or exceeded the retail
16 analogue for this sub-metric in June 2001. There was no CLEC activity for
17 this sub-metric in July 2001.

18

19 Other resale provisioning sub-metrics for which BellSouth did not meet the
20 benchmark/retail analogue in May, June and/or July 2001 were:

21

22 % Jeopardy Notice >= 48 hours / Business / Mechanized (A.2.9.2) (May)

1 The calculations for this measure have been determined to be incorrect. The
2 coding change in the Service Order Control System (SOCS) is currently
3 scheduled for a September 13, 2001, system load date. Based on this
4 schedule, the October data month will be the first full month that the change
5 will be in effect.

6

7 % Missed Installation Appointments / Business / < 10 Circuits / Dispatch
8 (A.2.11.2.1.1) (July)

9 BellSouth met 59 of the 63 installation appointments as scheduled for this
10 sub-metric in July 2001. The four missed appointments in this sub-metric did
11 not reveal any distinct patterns or systemic installation issues.

12

13 % Missed Installation Appointments / Design (Specials) / < 10 Circuits /
14 Dispatch (A.2.11.3.1.1) (May)

15 There was only one order in this sub-metric for May 2001. The small
16 universe for this measurement does not provide a statistically conclusive
17 comparison with the retail analogue. BellSouth met or exceeded the retail
18 analogue for this sub-metric in June 2001. There was no CLEC activity for
19 this sub-metric in July 2001.

20

21 % Provisioning Troubles w/i 30 days / Residence / < 10 Circuits / Non-
22 Dispatch (A.2.12.1.1.2) (July)

1 Less than 4% of the orders completed for this sub-metric in the 30 days prior
2 to July 2001 had trouble reports in July. The difference between the CLEC
3 value and the retail analogue for this sub-metric was .5%, virtually equivalent,
4 for the month.

5

6 % Provisioning Troubles w/i 30 days / Business / < 10 Circuits / Dispatch
7 (A.2.12.2.1.1) (June/July)

8 There were a total of ten troubles reported for the 106 orders that completed
9 in the 30 days prior to June 2001 for this sub-metric. Six of the ten reports
10 were closed as either test OK or found OK. For July, there were a total of
11 seven troubles reported for the 80 orders that completed in the 30 days prior
12 to July. There was no systemic pattern to the remaining four troubles for
13 June or for the troubles reported in July.

14

15 % Provisioning Troubles w/i 30 days / Centrex / < 10 Circuits / Non Dispatch
16 (A.2.12.5.1.2) (May)

17 There were only two orders in this sub-metric for May 2001. The small
18 universe for this measurement does not provide a statistically conclusive
19 comparison with the retail analogue. BellSouth met or exceeded the retail
20 analogue for this sub-metric in both June and July 2001.

21

22 Average Completion Notice Interval / Residence / < 10 Circuits / Dispatch
23 Electronic (A.2.14.1.1.1) (May)

1 Average Completion Notice Interval / Residence / < 10 Circuits / Non-

2 Dispatch Electronic (A.2.14.1.1.2) (May/June)

3 Average Completion Notice Interval / Business / < 10 Circuits / Non-Dispatch

4 Electronic (A.2.14.2.1.2) (June)

5 Average Completion Notice Interval / Centrex / >= 10 Circuits / Non-Dispatch

6 Electronic (A.2.14.5.2.2) (June)

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

8 between the performance comparing BellSouth retail and CLECs are the

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

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

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

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

13 provisioning process will generate inconsistencies with the original LSRs that

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

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

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

17 mismatches on CLEC orders exceed those for BellSouth retail orders.

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

19 average, which sometimes results in a miss. Specific Service

20 Representatives within the Work Management Centers have been assigned

21 to resolve any completion issues that are required. Providing specific training

22 and dedicating personnel to this task should reduce the difference between

23 the CLEC and retail analogue results.

1

2 Service Order Accuracy / Residence / < 10 Circuits / Non Dispatch

3 (A.2.25.1.1.2) (June/July)

4 BellSouth met the standard for 43 of the 48 orders reviewed in this sub-metric
5 for June and 70 of 97 orders reviewed in July 2001. The 95% benchmark set
6 a requirement of 46 orders in June and 92 orders in July based on the
7 quantity of orders for this sub-metric. BellSouth continues to focus on this
8 measurement in order to improve results to meet the benchmark.

9

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

11 (May)

12 BellSouth met the standard for 39 of the 45 orders reviewed in this sub-metric
13 for May 2001. The 95% benchmark set a requirement of 43 based on the
14 quantity of orders for this sub-metric. BellSouth met or exceeded the
15 benchmark for this sub-metric in both June and July 2001.

16

17 Service Order Accuracy / Business / < 10 Circuits / Non-Dispatch

18 (A.2.25.2.1.2) (July)

19 BellSouth met the standard for 51 of the 65 orders reviewed in this sub-metric
20 for July 2001. The 95% benchmark set a requirement of 62 based on the
21 quantity of orders for this sub-metric. BellSouth continues to focus on this
22 measurement in order to improve results to meet the benchmark.

23

1 Service Order Accuracy / Business / >= 10 Circuits / Dispatch (A.2.25.2.2.1)

2 (June)

3 BellSouth met the standard for 3 of the 5 orders reviewed in this sub-metric
4 for June 2001. The small universe for this measurement does not provide a
5 statistically conclusive comparison to the retail analogue. There were no
6 CLEC orders reviewed for this sub-metric in July 2001.

7

8 Service Order Accuracy / Business / >= 10 Circuits / Non Dispatch

9 (A.2.25.2.2.2) (June)

10 BellSouth met the standard for 3 of the 4 orders reviewed in this sub-metric
11 for June 2001. The small universe for this measurement does not provide a
12 statistically conclusive comparison to the retail analogue. There were no
13 CLEC orders reviewed for this sub-metric in July 2001.

14

15 Service Order Accuracy / Design / < 10 Circuits / Dispatch (A.2.25.3.1.1)

16 (June)

17 BellSouth met the standard for 1 of the 2 orders reviewed in this sub-metric
18 for June 2001. . The small universe for this measurement does not provide a
19 statistically conclusive comparison to the retail analogue. BellSouth met the
20 retail analogue comparison for this sub-metric in July 2001.

21

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

23

1 BellSouth met the relevant retail analogue comparisons for 86% of all the
2 Resale Maintenance & Repair measurements in May, 93% in June and 89%
3 in July 2001. The sub-metrics for which BellSouth did not meet the retail
4 analogues in May, June and/or July 2001 were:

5

6 % Missed Repair Appointments / Business / Non Dispatch (A.3.1.2.2) (May)

7 BellSouth missed 11 of the 50 appointments scheduled for this sub-metric in
8 May 2001. All eleven of the appointments were associated with one
9 customer's move to a new location that was scheduled as a non-dispatch
10 move. Once the orders were completed, the customer reported problems
11 with all eleven lines. Resolution turned out to be a multitude of issues at the
12 premise location. BellSouth met or exceeded the retail analogue for this sub-
13 metric in both June and July 2001.

14

15 % Missed Repair Appointments / Design (Specials) / Dispatch (A.3.1.3.1)
16 (July)

17 BellSouth missed one of four repair appointments scheduled for July 2001.
18 Such a small universe does not provide a statistically conclusive comparison
19 to the retail analogue.

20

21 Customer Trouble Report Rate / Residence / Dispatch (A.3.2.1.1) (June)

22 There were 537 reports out of an in service base of 19,449 or 2.76% for this
23 sub-metric compared with 2.40% for the retail analogue in June 2001. There

1 were 80 reports associated with drop wires that either had not been buried
2 after cutover or had not been cutover. Additional training for handling of
3 requests and associated follow-up for drop wire procedures is being
4 implemented. Also, 90 troubles were closed as found OK. Customer
5 representatives will be covered on the proper screening techniques for CLEC
6 troubles. BellSouth met the retail analogue comparison for this sub-metric in
7 July 2001.

8

9 Customer Trouble Report Rate / PBX / Dispatch (A.3.2.4.1) (May/June/July)

10 There were 6 trouble reports for the 869 in service lines for this sub-metric in
11 May, 2 reports out of 807 lines in June and 10 trouble reports out of 728 lines
12 in service in July 2001. BellSouth provided 98% or 99% trouble free service
13 for the in-service lines in this sub-metric for both CLECs and BellSouth retail
14 customers in all three months. When BellSouth provisions high quality
15 service coupled with very large universe sizes, it can cause an apparent out
16 of equity condition from a quantitative viewpoint. In these cases, there is
17 very little variation and the universe size is so large that the Z-test becomes
18 overly sensitive to any difference. In other words, the statistical test shows
19 that the measurement does not meet the fixed critical value when compared
20 with the retail analogue, but BellSouth's actual performance for both CLECs
21 and its own retail operations is at a very high level – often 98% or 99%. From
22 a practical point of view, the CLECs' ability to compete has not been hindered

1 even though the statistical results may technically show that BellSouth failed
2 to meet the benchmark/analogue.

3

4 Customer Trouble Report Rate / PBX / Non Dispatch (A.3.2.4.2) (May/July)

5 There were 4 trouble reports for the 869 in service lines for this sub-metric in
6 May and only 2 trouble reports for the 728 in service lines in July 2001.
7 BellSouth provided over 99.5% trouble free service for both retail and the
8 CLECs for this sub-metric for the months of May and July. When BellSouth
9 provisions high quality service coupled with very large universe sizes, it can
10 cause an apparent out of equity condition from a quantitative viewpoint. In
11 these cases, there is very little variation and the universe size is so large that
12 the Z-test becomes overly sensitive to any difference. In other words, the
13 statistical test shows that the measurement does not meet the fixed critical
14 value when compared with the retail analogue, but BellSouth's actual
15 performance for both CLECs and its own retail operations is at a very high
16 level – in this case over 99%. From a practical point of view, the CLECs'
17 ability to compete has not been hindered even though the statistical results
18 may technically show that BellSouth failed to meet the benchmark/analogue.
19 BellSouth met the retail analogue comparison for this sub-metric in June
20 2001.

21

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

1 There was only one trouble report for this sub-metric in May 2001. The small
2 universe for this measurement does not provide a statistically conclusive
3 comparison with the retail analogue. There was no CLEC activity for this sub-
4 metric in June. BellSouth met the retail analogue comparison for this sub-
5 metric in July 2001.

6

7 % Repeat Troubles within 30 days / Business / Non Dispatch (A.3.4.2.2)
8 (June)

9 There were a total of 15 repeat reports out of the 57 troubles reported for this
10 sub-metric in June 2001. Of the 15 repeat reports, 9 were closed as test OK.
11 There were 5 reports closed to line translation issues and 1 was a follow-up
12 report within the same day. No patterns to the original reports were found
13 during this analysis. BellSouth met the retail analogue comparison for this
14 sub-metric in July 2001.

15

16 % Repeat Troubles within 30 days / PBX / Dispatch (A.3.4.4.1) (May)

17 There were only six trouble reports for this sub-metric in May 2001. The
18 small universe for this measurement does not provide a statistically
19 conclusive comparison with the retail analogue. BellSouth met or exceeded
20 the retail analogue for this sub-metric in both June and July 2001.

21

22 % Repeat Troubles within 30 days / PBX / Non Dispatch (A.3.4.4.2) (May)

1 There were four trouble reports for this sub-metric in May and only two trouble
2 reports in July 2001. There was no CLEC activity for this sub-metric in June.
3 The small universe for this measurement does not provide a statistically
4 conclusive comparison with the retail analogue.

5

6 % Repeat Troubles within 30 days / Centrex / Non Dispatch (A.3.4.5.2) (May)

7 There was only one trouble report for this sub-metric in May 2001. There was
8 no CLEC activity for this sub-metric in June. The small universe for this
9 measurement does not provide a statistically conclusive comparison with the
10 retail analogue. BellSouth met the retail analogue comparison for this sub-
11 metric in July 2001.

12

13 % Repeat Troubles within 30 days / ISDN / Dispatch (A.3.4.6.1) (July)

14 There were four trouble reports for this sub-metric in July 2001. The small
15 universe for this measurement does not provide a statistically conclusive
16 comparison with the retail analogue.

17

18 Out of Service > 24 Hours / Design (Specials) / Dispatch (A.3.5.3.1) (July)

19 There was one trouble report in this sub-metric that resulted in an out-of-
20 service condition for more than 24 hours in July 2001. Such a small universe
21 for this sub-metric does not provide a statistically conclusive benchmark
22 comparison.

23

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III. Summary

As stated in the Introduction to the Analysis of Performance Measurements section, BellSouth met or exceeded the criteria for 414 of the 487 sub-metrics (85%) for which there was CLEC activity in May 2001. In June, 368 of 425 sub-metrics (87%) met or exceeded benchmarks or retail analogues. In July, BellSouth met or exceeded the required standards for 424 of the 488 (87%) sub-metrics.

During the three-month period, May through July 2001, excluding the three measures with calculation problems, there were a total of 329 sub-metrics that had CLEC activity for all three months and that were compared with either benchmarks or retail analogues. Of these 329 sub-metrics, 249 sub-metrics satisfied the comparison criteria during all three months, and another 42 met the criteria for two of the three months – over 88% of the sub-metrics that had activity in all three months satisfied the comparison criteria in at least two of the three months.