

SEEM COMPARISON- KENTUCKY AND LOUISIANA

Differences are identified and reasons for differences are briefly discussed

COMPONENT	LOUISIANA	KENTUCKY PROPOSAL	COMMENTS
Tier 1 metrics and penalties.	Incents performance to individual CLECs. Remedies paid to CLEC	Same	
Tier 2 metrics and penalties	Incents performance to CLEC industry. Remedies paid to Commission or designee.	Same	
Tier 1 and Tier 2 penalty calculations are based on:	Per transaction	Same	
Fee schedule for each transaction for Tier 1 and Tier 2	Higher penalties for more critical measurements. Monthly penalties escalate over time for repeat failures.	Same	
Schedule for posting data and reports related to SEEM.	Preliminary SEEM reports will be posted on by 8:00 A.M. EST on the last day of each month or the first business day after the last day of the month for the previous month's performance. Final validated SEEM reports will be posted on the 15th of the month, following the final validated SQM report.	Same	
Penalties for late or incomplete reports?	Yes	Same	
Cap on overall liability	Yes. 20% of Net Revenue	Yes. 36% of Net Revenue.	KY's proposed absolute cap at 36% of Net Revenue is consistent with all states approved by FCC for Long Distance authority. However, the 20% cap adopted by the Louisiana PSC is a procedural cap rather than an absolute cap. A procedural cap is the level at which BellSouth must file a petition to avoid penalties above the cap level.

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Provisions for audits?	Yes	Same	
Statistical Methodology for comparisons of CLEC vs. Retail performance.	Truncated Z with Balancing Critical value. Transactions are compared at low (cell) level where characteristics between CLEC and retail are similar.	Same	
Parameter Delta Value for use in statistical comparisons of CLEC vs. Retail performance	1.0 for Tier 1 0.5 for Tier 2	Same	
Market Penetration adjustment for low volumes of advanced and nascent services?	Yes	No	Not proposed for KY. The market penetration adjustment is an additional penalty, over and above Tier 1 and Tier 2, that would increase the level of penalties for no other reason than the CLECs have market share below a pre-determined arbitrary level. So, if CLECs choose not to enter the market or compete vigorously for any reason, BellSouth would have to pay higher penalties.
Provisions for accruing interest on payments past the due date?	Yes	Same	
Provisions for dispute resolution	Yes	Same	
Measurements in the plan	See the table below.	See the table below.	

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MEASUREMENT	LOUISIANA				KENTUCKY				COMMENTS
	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard	
1. Average Response Time – Pre-Ordering/Ordering	X			Parity + 4 seconds	Same	Same	N/A	Same	
2. Interface Availability – Pre-Ordering/Ordering	X			≥ 99.5 %	Same	Same	N/A	Same	
3. Interface Availability – Maintenance & Repair	X			≥ 99.5 %	Same	Same	N/A	Same	
4. Loop Makeup – Response Time – Manual	X			95 % within 3 Business days	Same	Same	N/A	Same	
5. Loop Makeup – Response Time – Electronic	X			95 % within 1 minute	Same	Same	N/A	Different standard: 90 % within 5 minutes (reassess in 6 months-new system)	Different benchmark is proposed because 1 minute response time is stringent, particularly when applied to new system.
6. Acknowledgement Message Timeliness – EDI						X	N/A	95% within 30 minutes	The systems that provide an acknowledgement message to CLECs are regional in nature. Particularly, a failure in this process would affect all CLECs. Therefore, this measure is proposed for Tier 2 in Kentucky. This measure is not included in Tier 1 or Tier 2 in Louisiana.
7. Acknowledgement Message Timeliness – TAG						X	N/A	95% within 30 minutes	Same as above.
8. Acknowledgement Message Completeness EDI						X	N/A	100%	Same as above.
9. Acknowledgement Message Completeness TAG						X	N/A	100%	Same as above.

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2		Tier 3 (Note 1)	Standard
10. Percent Flow-through Service Requests (Summary)		X		Residence - 90%; 95% in 6 Months Business - 80%; 90% in 6 months UNE - 80%; 90% in 6 months LNP - 80%; 90% in 6 months	Same	Same	N/A	Residence - 95% Business - 90% UNE - 85%	BellSouth proposes the same standard for Residence and Business for Kentucky as the Louisiana PSC adopted after 6 months. However, LNP is not shown as a separate category, and the UNE benchmark proposed for Kentucky is 85%. BellSouth has formed a Flow-Through Task Force to work towards increasing the flow-through rate on a going forward basis.
11. Reject Interval	X			Fully Mechanized - 97% ≤ 1 hour Part Mechanized - 85% ≤ 10 hours Non-Mechanized - 85% ≤ 24 hours IC Trunks - 85% ≤ 4 days	Not Proposed	Same	N/A	Only Fully Mechanized method of submission is included: Standard is 95% ≤ 1 hour	The systems that provide reject messages for LSRs are regional in nature. Particularly, a failure in this process would affect all CLECs. Therefore, this measure is proposed for Tier 2 only in Kentucky. The proposed benchmark for Tier 1 is at 95% due to fact that 97% is a benchmark requiring near-perfection. The SEEM plan proposed for Kentucky only uses the fully mechanized method of submission. This is where the preponderance of CLEC activity occurs, about 75%. Also, partially mechanized and non-mechanized methods of submission are subject to gaming by the CLECs. LSRs can effectively be submitted with known errors in such a way as to guarantee a penalty payment.

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard	
12. Firm Order Confirmation Timeliness	X	X		Fully Mechanized 95% ≤ 3hours Part. Mechanized 85% ≤ 10hours Non-Mechanized 85% ≤ 36 hours IC Trunks 85% ≤ 14days	Not Proposed	Same	N/A	Only Fully Mechanized method of submission is included. Standard for Fully mechanized is the same 95% ≤ 3hours 95% returned	Same Comments as above for exclusion form Tier 1 and use of the fully mechanized method of submission only in SEEM.
13. Firm Order Confirmation and Reject Response Completeness – Fully Mechanized						X	N/A		This measure is proposed as a Tier 2 measure in Kentucky, but was not ordered by the Louisiana PSC for either a Tier 1 or Tier 2 application.
14. Percent Missed Installation Appointments – Resale POTS	X	X	X	Retail Res. & Bus. (POTS)	Same	Same	N/A	Same	
15. Percent Missed Installation Appointments – Resale Design	X	X	X	Retail Design	Same	Same	N/A	Same	
16. Percent Missed Installation Appointments – UNE Loop and Port Combinations	X	X	X	Retail Res. & Bus.	Same	Same	N/A	Same	
17. Percent Missed Installation Appointments – UNE Loops	X	X	X	Retail Res. & Bus. Dispatch	Same	Same	N/A	Same	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard	
	18. Percent Missed Installation Appointments – UNE xDSL	X	X	X	ADSL provided to Retail	Same	Same	N/A	
19. Percent Missed Installation Appointments – UNE Line Sharing	X	X	X	ADSL provided to Retail	Same	Same	N/A	Same	
20. Percent Missed Installation Appointments – Local IC Trunks	X	X	X	Parity with Retail	Same	Same	N/A	Same	
21. Average Completion Interval – Resale POTS	X	X		Retail Res. & Bus. (POTS)	Same	Same	N/A	Same	
22. Average Completion Interval – Resale Design	X	X		Retail Design	Same	Same	N/A	Same	
23. Average Completion Interval – UNE Loop and Port Combinations	X	X		Retail Res. & Bus.	Same	Same	N/A	Same	
24. Average Completion Interval – UNE Loops	X	X		Retail Res. & Bus. Dispatch	Same	Same	N/A	Same	
25. Average Completion Interval – UNE xDSL	X	X		- 7 Days w/o Conditioning -14 Days w/ Conditioning	Same	Same	N/A	Different standard: based on <u>ADSL</u> provided to <u>Retail</u>	Since BellSouth has a comparable service, a retail analog is proposed for this measure in Kentucky rather than the benchmarks used in Georgia. Parity can be more appropriately determined by comparing UNE xDSL service to ADSL provided to retail.
26. Average Completion Interval – UNE Line Sharing	X	X		ADSL provided to Retail	Same	Same	N/A	Same	
27. Average Completion Interval – Local IC Trunks	X	X		Parity with Retail	Same	Same	N/A	Same	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)		Standard
28. Average Completion Notice Interval – Resale POTS	X	X		Retail Res. & Bus. (POTS)	Not Proposed	Not Proposed	N/A	Same	BellSouth does not propose Average Completion Notice Interval as a SEEM measure for Kentucky because only critical measures should be included. BellSouth's proposed SEEM plan already includes Percent Missed Installation Appointments and Average Order Completion Interval, which are the related and critical provisioning measures. Same as above.
29. Average Completion Notice Interval – Resale Design	X	X		Retail Design	Not Proposed	Not Proposed	N/A	Same	Same as above.
30. Average Completion Notice Interval – UNE Loop and Port Combinations	X	X		Retail Res. & Bus.	Not Proposed	Not Proposed	N/A	Same	Same as above.
31. Average Completion Notice Interval – UNE Loops	X	X		Retail Res. & Bus. Dispatch	Not Proposed	Not Proposed	N/A	Same	Same as above.
32. Average Completion Notice Interval – UNE xDSL	X	X		ADSL provided to Retail	Not Proposed	Not Proposed	N/A	Same	Same as above.
33. Average Completion Notice Interval – UNE Line Sharing	X	X		ADSL provided to Retail	Not Proposed	Not Proposed	N/A	Same	Same as above.
34. Average Completion Notice Interval – Local IC Trunks	X	X		Parity with Retail	Not Proposed	Not Proposed	N/A	Same	Same as above.
35. Coordinated Customer Conversions Interval – Unbundled Loops	X	X		95% ≤ 15 Minutes	Same	Same	N/A	Same	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard	
36. Coordinated Customer Conversions – Hot Cut Timeliness % within interval – UNE Loops	X	X		95% within + or – 15 minutes of scheduled start time	Same	Same	N/A	Same standard except for IDLC. IDLC 95% within 4 -hour window ≤ 5%	Where the end user is served by Integrated Digital Loop Carrier, three technicians, are involved: the CLEC, BellSouth Central Office tech and BellSouth field tech who must convert the line. This additional coordination requires more flexibility in time schedule.
37. Coordinated Customer Conversions – % Provisioning Troubles Received within 7 days of a completed service order – UNE Loops					X	X	N/A		While this measure was not ordered by the Louisiana PSC for either Tier 1 or Tier 2 treatment, this measure is proposed for Kentucky as both a Tier 1 and Tier 2 measure.
38. Cooperative Acceptance Testing - % xDSL Loops Tested								95% of Lines Tested	While this measure was not ordered by the Louisiana PSC for either Tier 1 or Tier 2 treatment, this measure is proposed for Kentucky as a Tier 2 measure.
39. % Provisioning Troubles within 5 days of Service Order Completion – Resale POTS	X	X		Retail Res. & Bus. (POTS)			N/A		The Louisiana PSC ordered the Measure “Percent Provisioning Troubles within 5 Days.” BellSouth proposes a similar measure “Percent Provisioning Troubles Within 30 Days” for Kentucky, which is the measure ordered in Georgia.
40. % Provisioning Troubles within 5 days of Service Order Completion – Resale Design	X	X		Retail Design			N/A		Same as above.
41. % Provisioning Troubles within 5 days of Service Order Completion – UNE Loop and Port Combinations	X	X		Retail Res. & Bus.			N/A		Same as above.

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard		
42. % Provisioning Troubles within 5 days of Service Order Completion – UNE Loops	X	X		Retail Res. & Bus. Dispatch			N/A		Same as above	
43. % Provisioning Troubles within 5 days of Service Order Completion – UNE xDSL	X	X		ADSL provided to Retail			N/A		Same as above	
44. Provisioning Troubles within 5 days of Service Order Completion – UNE Line Sharing	X	X		ADSL provided to Retail			N/A		Same as above	
45. % Provisioning Troubles within 5 days of Service Order Completion – Local IC Trunks	X	X		Parity with Retail	Same	Same	N/A		Same as above	
46. % Provisioning Troubles within 30 days of Service Order Completion – Resale POTS					X	X	N/A	Retail Res. & Bus. (POTS)	Bellsouth proposes this measure for Kentucky in lieu of the measure "Percent Provisioning Troubles within 4 days" that was adopted by the Louisiana PSC.	
47. % Provisioning Troubles within 30 days of Service Order Completion – Resale Design					X	X	N/A	Retail Design	Same as above.	
48. % Provisioning Troubles within 30 days of Service Order Completion – UNE Loop and Port Combinations					X	X		Retail Res. & Bus.	Same as above.	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2		Tier 3 (Note 1)	Standard
49. % Provisioning Troubles within 30 days of Service Order Completion – UNE Loops					X	X		Retail Res. & Bus. Dispatch	Same as above.
50. % Provisioning Troubles within 30 days of Service Order Completion – UNE xDSL					X	X		ADSL provided to Retail	Same as above.
51. Provisioning Troubles within 30 days of Service Order Completion – UNE Line Sharing					X	X		ADSL provided to Retail	Same as above.
52. % Provisioning Troubles within 30 days of Service Order Completion – Local IC Trunks					X	X		Parity with Retail	Same as above.
53. LNP – Percent Missed Installation Appointments	X	X		95% Due Dates Met	Same	Same	N/A	Same	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2		Tier 3 (Note 1)	Standard
54. LNP – Average Disconnect Timeliness Interval	X	X		95% ≤ 12 hours	Not proposed	Not proposed	N/A	N/A	This measurement is not an indicator of LNP Disconnect Timeliness Interval as it affects the CLEC and the customer. Mainly, BellSouth can provide a high level of service to CLECs and their customers, yet BellSouth would be assessed large penalties. This result is inconsistent with an enforcement plan's purpose. BellSouth filed a Motion to Modify with the GPSC indicating that this metric is inadequately defined and proposing several alternative metrics to either augment or replace the existing one. Therefore, BellSouth does not propose this measure for Tier 1 or Tier 2 in Kentucky. Note: Payments have been suspended in Georgia after May.
55. Missed Repair Appointments – Resale POTS	X	X	X	Retail Res. & Bus. (POTS)	Same	Same	N/A	Same	
56. Missed Repair Appointments – Resale Design	X	X	X	Retail Design	Same	Same	N/A	Same	
57. Missed Repair Appointments – UNE Loop and Port Combinations	X	X	X	Retail Res. & Bus.	Same	Same	N/A	Same	
58. Missed Repair Appointments – UNE Loops	X	X	X	Retail Res. & Bus. Dispatch	Same	Same	N/A	Same	
59. Missed Repair Appointments – UNE xDSL	X	X	X	ADSL provided to Retail	Same	Same	N/A	Same	
60. Missed Repair Appointments – UNE Line Sharing	X	X	X	ADSL provided to Retail	Same	Same	N/A	Same	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard	
	61. Missed Repair Appointments – Local IC Trunks	X	X	X	Parity with Retail	Same	Same	N/A	
62. Customer Trouble Report Rate – Resale POTS	X	X		Retail Res. & Bus. (POTS)	Same	Same	N/A	Same	
63. Customer Trouble Report Rate – Resale Design	X	X		Retail Design	Same	Same	N/A	Same	
64. Customer Trouble Report Rate – UNE Loop and Port Combinations	X	X		Retail Res. & Bus.	Same	Same	N/A	Same	
65. Customer Trouble Report Rate – UNE Loops	X	X		Retail Res. & Bus. Dispatch	Same	Same	N/A	Same	
66. Customer Trouble Report Rate – UNE xDSL	X	X		ADSL provided to Retail	Same	Same	N/A	Same	
67. Customer Trouble Report Rate – UNE Line Sharing	X	X		ADSL provided to Retail	Same	Same	N/A	Same	
68. Customer Trouble Report Rate – Local IC Trunks	X	X		Parity with Retail	Same	Same	N/A	Same	
69. Maintenance Average Duration – Resale POTS	X	X		Retail Res. & Bus. (POTS)	Same	Same	N/A	Same	
70. Maintenance Average Duration – Resale Design	X	X		Retail Design	Same	Same	N/A	Same	
71. Maintenance Average Duration – UNE Loop and Port Combinations	X	X		Retail Res. & Bus.	Same	Same	N/A	Same	
72. Maintenance Average Duration – UNE Loops	X	X		Retail Res. & Bus. Dispatch	Same	Same	N/A	Same	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard	
	73. Maintenance Average Duration – UNE xDSL	X	X		ADSL provided to Retail	Same	Same	N/A	
74. Maintenance Average Duration – UNE Line Sharing	X	X		ADSL provided to Retail	Same	Same	N/A	Same	
75. Maintenance Average Duration – Local IC Trunks	X	X		Parity with Retail	Same	Same	N/A	Same	
76. % Repeat Troubles within 30 days – Resale POTS	X	X		Retail Res. & Bus. (POTS)	Same	Same	N/A	Same	
77. % Repeat Troubles within 30 days – Resale Design	X	X		Retail Design	Same	Same	N/A	Same	
78. % Repeat Troubles within 30 days – UNE Loop and Port Combinations	X	X		Retail Res. & Bus.	Same	Same	N/A	Same	
79. % Repeat Troubles within 30 days – UNE Loops	X	X		Retail Res. & Bus. Dispatch	Same	Same	N/A	Same	
80. % Repeat Troubles within 30 days – UNE xDSL	X	X		ADSL provided to Retail	Same	Same	N/A	Same	
81. % Repeat Troubles within 30 days – UNE Line Sharing	X	X		ADSL provided to Retail	Same	Same	N/A	Same	
82. % Repeat Troubles within 30 days – Local IC Trunks	X	X		Parity with Retail	Same	Same	N/A	Same	
83. Invoice Accuracy		X	X	Parity with Retail	Same	Same	N/A	Same	
84. Mean Time to Deliver Invoices		X	X	Parity with Retail	Same	Same	N/A	Same	
85. Usage Data Delivery Accuracy		X		Parity with Retail	Same	Same	N/A	Same	

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	Tier 1	Tier 2	Tier 3	Standard	Tier 1	Tier 2	Tier 3 (Note 1)	Standard	
86. Usage Data Delivery Timeliness		X		Parity with Retail		Not Proposed	N/A	Same	BellSouth proposes three billing measures for the Kentucky SEEM plan, i.e., Invoice Accuracy, Mean Time to Deliver Invoices and Usage Data Delivery Accuracy. These measures are more than sufficient indicators of BellSouth billing processes. Adding yet a fourth billing measure (Usage Data Delivery Timeliness) is unnecessary.
87. Trunk Group Performance – Aggregate & CLEC Specific	X	X	X	Any 2 hour period where CLEC Blockage exceeds BellSouth Blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs and 9 for BellSouth	Same	Same	N/A	Same	
88. Collocation Percent of Due Dates Missed	X	X	X	≥ 95% on time	Same	Same	N/A	Same	
89. Timeliness of Change Management Notices		X		98% ≥ 30 days of Release	X	Same	N/A	95% ≥ 30 days of Release	While the Louisiana PSC only adopted this measure for Tier 2 application, BellSouth proposes this measure for both Tier 1 and Tier 2 in Kentucky. However, BellSouth proposes a benchmark of 95% because 98% requires near perfection.
90. Timeliness of Documents Associated with Change					X	X	N/A	95% ≥ 30 days of the Change	While the Louisiana PSC did not adopt this measure for either Tier 1 or Tier 2 application, BellSouth proposes this measure for both Tier 1 and Tier 2 in Kentucky.

NOTE 1: Tier 3 is not proposed in the Kentucky SEEM Plan.

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COMPONENT	FLORIDA	KENTUCKY	COMMENTS
Tier 1 metrics and penalties.	Incent performance to individual CLECs. Remedies paid to CLEC	Same	
Tier 2 metrics and penalties	Incent performance to CLEC industry. Remedies paid to Commission or designee.	Same	
Tier 1 and Tier 2 penalty calculations are based on:	Per transaction	Per measure	The Florida PSC adopted its Staff recommendation that BellSouth file a revised enforcement plan with penalties calculated on a per measure rather than a per transaction.
Fee schedule for each measurement category by Tier 1 and Tier 2	Higher penalties for more critical measurements. Monthly penalties escalate over time for repeat failures.	Same	
Schedule for posting data and reports related to SEEM.	Preliminary SEEM reports will be posted on by 8:00 A.M. EST on the last day of each month or the first business day after the last day of the month for the previous month's performance. Final validated SEEM reports will be posted on the 15th of the month, following the final validated SQM report.	Same	
Penalties for late or incomplete reports?	Yes	Same	
Cap on overall liability	Yes. 39% of Net Revenue	Yes. 36% of Net Revenue.	KY's proposed of cap at 36% of Net Revenue is consistent with all states approved by FCC for Long Distance authority.
Provisions for audits?	Yes	Same	

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COMPONENT	FLORIDA	KENTUCKY	COMMENTS
Statistical Methodology for comparisons of CLEC vs. Retail performance.	Truncated Z with Balancing Critical value. Transactions are compared at low (cell) level where characteristics between CLEC and retail are similar.	Same	
Parameter Delta Value for use in statistical comparisons of CLEC vs. Retail performance	A delta function is used. Based on this function, the value of delta would vary inversely with the CLEC sample size.	Fixed delta values 1.0 for Tier 1 0.5 for Tier 2	Delta is a parameter that is related to 'materiality.' BellSouth's proposed delta of 1.0 for Tier1 would result in differences of ½ standard deviation as being material. The values recommended for KY are consistent with the LA PSC's Commission order, which followed nearly 2 years of proceedings and workshops related to performance measurements and enforcement.
Market Penetration adjustment for low volumes of advanced and nascent services?	No	No	Not proposed for KY. The market penetration adjustment is an additional penalty, over and above Tier 1 and Tier 2, that would increase the level of penalties for no other reason than the CLECs have market share below a pre-determined arbitrary level. So, if CLECs choose not to enter the market or compete vigorously for any reason, BellSouth would have to pay higher penalties.
Provisions for accruing interest on payments past the due date?	Yes	Same	
Provisions for dispute resolution	Yes	Same	

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COMPONENT	FLORIDA	KENTUCKY	COMMENTS
Disaggregation	The SEEM disaggregation is the same as the SQM disaggregation. The Florida PSC SEEM level of disaggregation is basically the same as BellSouth's SQM product categories proposed for Kentucky plus categories for UNE Line Splitting and EELS.	The SEEM disaggregation is different from the SQM disaggregation. The sub-metrics listed in the SQM are aggregated into seven categories for SEEM purposes.	While the SEEM penalties are reflected on an aggregated basis under BellSouth's proposal for Kentucky, the statistical test is actually performed at the cell level. The cell level is where the "like-to-like" comparisons are done, which is the key to a valid plan.
Measurements in the plan	See the table below.	See the table below	

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MEASUREMENT (Note 1)	FLORIDA			KENTUCKY			COMMENTS
	Tier 1	Tier 2	Standard	Tier 1	Tier 2	Standard	
1. Average Response Time -- Pre-Ordering/Ordering		X	Parity + 2 seconds	Same	Same	Different standard: Parity + 4 seconds	BellSouth proposes a standard of parity + 4 seconds for OSS response interval. This standard is consistent with rulings by the FCC in the orders granting New York and Texas InterLATA authority. The FCC found the additional 4 seconds to be reasonable for firewall security.
2. Interface Availability -- Pre-Ordering/Ordering		X	≥ 99.5 %	Same	Same	Same	
3. Interface Availability -- Maintenance & Repair		X	≥ 99.5 %	Same	Same	Same	
4. Response Interval -- Maintenance & Repair		X	Parity	Not Proposed	Not Proposed	Same	Since CLECs access the required systems in substantially the same way as the retail side, this measure is not included in the proposed SEEM plan.
5. Loop Makeup -- Response Time -- Manual		X	95 % within 3 Business days	Same	Same	Same	
6. Loop Makeup -- Response Time -- Electronic		X	95 % within 1 minute	Same	Same	Different standard: 90 % within 5 minutes (reassess in 6 months-new system)	Different benchmark is proposed because 1 minute response time is stringent, particularly when applied to new system.
7. Acknowledgement Message Timeliness -- Electronic	X		95 % within 30 minutes	Not proposed	Same	Same	The systems that provide an acknowledgement message to CLECs are regional in nature. Particularly, a failure in this process would affect all CLECs. Therefore, this measure is not proposed for Tier 1, but instead is proposed for Tier 2 only.
8. Acknowledgement Message Completeness (Fully Mechanized, Partially Mechanized, & Total Mechanized)	X		100 %	Not proposed	Same	Same	Same as above.

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MEASUREMENT (Note 1)	FLORIDA			KENTUCKY			COMMENTS
	Tier 1	Tier 2	Standard	Tier 1	Tier 2	Standard	
	9. Percent Flow-through Service Requests (Summary & Detail)	X	X	Residence - 95% Business - 90% UNE - 85% LNP - 85% <u>Fully Mechanized</u> - 97% ≤ 1 hour <u>Part. Mechanized</u> - 95% ≤ 10 hours <u>Non-Mechanized</u> - 95% ≤ 24 hours <u>Local IC Trunks</u> - 95% ≤ 36 Hours	Not proposed	Same	
10. Reject Interval	X	X		Not proposed	Same	Only Fully Mechanized method of submission is included: Standard is 95% ≤ 1 hour	Same as above for exclusion of Tier 1. Benchmark for Tier 1 is at 95% due to fact that 97% is a benchmark requiring near-perfection. The SEEM plan proposed for Kentucky only uses the fully mechanized method of submission. This is where the preponderance of CLEC activity occurs, about 75%. Also, partially mechanized and non-mechanized methods of submission are subject to gaming by the CLECs. LSRs can effectively be submitted with known errors in such a way as to guarantee a penalty payment.
11. Firm Order Confirmation Timeliness	X	X	<u>Fully Mechanized</u> 95% ≤ 3 hours <u>Part. Mechanized</u> 95% ≤ 10 hours <u>Non-Mechanized</u> 95% ≤ 24 hours <u>Local IC Trunks</u> 95% ≤ 48 hours	Not Proposed	Same	Only Fully Mechanized method of submission is included: Standard for Fully mechanized is the same 95% ≤ 3 hours	Same Comments as above for exclusion form Tier 1 and use of the fully mechanized method of submission only in SEEM.

SEEM COMPARISON- KENTUCKY AND FLORIDA

Differences are identified and reasons for differences are briefly discussed

MEASUREMENT (Note 1)	FLORIDA				KENTUCKY			COMMENTS
	Tier 1	Tier 2	Standard	Tier 1	Tier 2	Standard		
12. Firm Order Confirmation and Reject Response Completeness – Fully Mechanized	X	X	95 % returned	Not Proposed	Same	Same	Same reason for exclusion form Tier 1 as above.	
13. Percent Missed Installation Appointments	X	X	Retail Analog	Same	Same	Same		
14. Speed of Answer in Ordering Center	X	X	Parity with retail	Not Proposed	Not Proposed	Diagnostic	BellSouth believes that only key performance measures should be included in the enforcement plan. CLECs do not place orders via phone, as do BellSouth customers. Rather, CLEC orders are placed electronically or by fax machine. Therefore, this metric does not reflect a critical measurement.	
15. LNP- Reject Interval Distribution & Average Reject Interval	X	X	Fully Mechanized - 97% ≤ 1 hour Part. Mechanized - 95% ≤ 10 hours Non-Mechanized - 95% ≤ 24 hours	Not Proposed	Not Proposed	N/A	BellSouth's SEEM plan contains the measure Reject Interval, which reflects BellSouth's performance for fully mechanized orders based on twenty-one products. It is unnecessary to reflect a separate SEEM measure for LNP orders.	
16. LNP – FOC Timeliness Interval Distribution & FOC Average Interval	X	X	Fully Mechanized 95% ≤ 3 hours Part. Mechanized 95% ≤ 10 hours Non-Mechanized 95% ≤ 24 hours	Not Proposed	Not Proposed	N/A	Same as above.	
17. Percent Missed Installation Appointments	X	X	Retail Analog	Same	Same	Same		
18. Average Completion Interval	X	X	Retail Analog	Same	Same	Same		

SEEM COMPARISON- KENTUCKY AND FLORIDA

Differences are identified and reasons for differences are briefly discussed

MEASUREMENT (Note 1)	FLORIDA			KENTUCKY			COMMENTS
	Tier 1	Tier 2	Standard	Tier 1	Tier 2	Standard	
	X	X	95% ≤ 15 Minutes	Same	Same	Same	
19. Coordinated Customer Conversions Interval – Unbundled Loops	X	X	95% within + or – 15 minutes of scheduled start time	Same	Same	Same	
20. Coordinated Customer Conversions – Hot Cut Timeliness % within interval - UNE Loops	X	X	IDLC 95% within 4 hour window ≤ 5%	Same	Same	Same	
21. Coordinated Customer Conversions – % Provisioning Troubles Received within 7 days of a completed service order – UNE Loops	X	X	≤ 5%	Same	Same	Same	
22. Cooperative Acceptance Testing - % xDSL Loops Tested	X	X	95% of Lines Successfully Tested	Not proposed	Same	Same	Not proposed as a part of Tier 1 because a failure in this process would affect all CLECs. Therefore Tier 2 is the appropriate incentive.
23. % Provisioning Troubles within 30 days of Service Order Completion	X	X	Retail Res. & Bus. (POTS)	Same	Same	Same	
24. LNP – Percent Missed Installation Appointments	X	X	95% Due Dates Met	Same	Same	Same	
25. Missed Repair Appointments	X	X	Retail Analog	Same	Same	Same	
26. Customer Trouble Report Rate	X	X	Retail Analog	Same	Same	Same	

SEEM COMPARISON- KENTUCKY AND FLORIDA

Differences are identified and reasons for differences are briefly discussed

MEASUREMENT (Note 1)	FLORIDA			KENTUCKY			COMMENTS
	Tier 1	Tier 2	Standard	Tier 1	Tier 2	Standard	
	27. Maintenance Average Duration	X	X	Retail Analog	Same	Same	
28. % Repeat Troubles within 30 days	X	X	Retail Analog	Same	Same	Same	
29. Out of Service > 24 hours	X	X	Retail Analog	Not Proposed	Not Proposed	Same	BellSouth proposes four maintenance and repair measure for the Kentucky SEEM plan, namely, Missed Repair Appointments, Customer Trouble Report Rate, Maintenance Average Duration, and Percent Repeat Troubles within 30 Days. BellSouth believes it is unnecessary to include the measure Out of Service > 24 hours, as this result would be captured in Maintenance Average Duration.
30. Invoice Accuracy	X	X	Parity with Retail	Not proposed	Same	Same	Not proposed as a part of Tier 1 because a failure in this process would affect all CLECs. Therefore Tier 2 is appropriate incentive.
31. Mean Time to Deliver Invoices	X	X	Parity with Retail	Not proposed	Same	Same	Same as above.
32. Usage Data Delivery Accuracy		X	Parity with Retail	Same	Same	Same	
33. Trunk Group Performance - Aggregate	X	X	Any 2 hour period where CLEC Blockage exceeds BellSouth Blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs and 9 for BellSouth	Same	Same	Same	
34. Collocation Percent of Due Dates Missed	X	X	≥ 95% on time	Same	Same	Same	

SEEM COMPARISON- KENTUCKY AND FLORIDA

Differences are identified and reasons for differences are briefly discussed

MEASUREMENT (Note 1)	FLORIDA			KENTUCKY			COMMENTS
	Tier 1	Tier 2	Standard	Tier 1	Tier 2	Standard	
35. Timeliness of Change Management Notices		X	95% ≥ 30 days of Release	Same	Same	Same	
36. Timeliness of Documents Associated with Change		X	95% ≥ 30 days of the Change	Same	Same	Same	

NOTE 1: BellSouth is in the process of filing a revised plan with the Florida PSC based on the recent order adopting its Staff recommendation. Once the revised plan is filed, the FPSC Staff will review the revised plan and make its recommendation. This work has not yet been finalized. For this reason and due to the significant differences in disaggregation proposed by BellSouth for Kentucky and the Florida recommendation for the Ordering, Provisioning and Maintenance and Repair Measures, these disaggregation levels are not shown separately in the matrix above with this filing. The primary differences are noted in the general comparison of the Kentucky and Florida SEEM plans above.