

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

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

14  
15                                **A. Introduction**

16  
17        Attachment 1D is the Monthly State Summary (MSS) for Kentucky for  
18        September 2001. The September MSS, similar to those of July and August,  
19        contains 2,250 sub-metrics. In September 2001, BellSouth met or exceeded  
20        the comparison criteria for 519 of the 574 sub-metrics, or 90%, that had  
21        CLEC activity and were compared to benchmarks or retail analogues. In  
22        August 2001, BellSouth met or exceeded the benchmark / retail analogue for  
23        440 of the 513 sub-metrics, or 86% that had CLEC activity, and in July 2001,

1 BellSouth met or exceeded the benchmark or retail analogue for 424 of the  
2 488 sub-metrics, or 87%, that had CLEC activity.

3

4 As explained in previous updates to this Exhibit, three of the measures have  
5 been identified by BellSouth as having deficiencies in their calculations and  
6 are being investigated and evaluated for appropriate program code  
7 corrections. These three measures are Average Jeopardy Notice Interval,  
8 FOC & Reject Completeness (including the "Multiple Responses" sub-  
9 metrics), and LNP Disconnect Timeliness. Even though these measures are  
10 included in the MSS and in the total number of measurements calculation  
11 (2,250), the results for these three measures were excluded from the July and  
12 August "Met/Total" (440/513) percentage calculations. As the program coding  
13 corrections are completed, the additional sub-metrics affected by the changes  
14 will be included in the Exhibit updates. In this update for September data,  
15 corrections have been implemented for many of the sub-metrics in the FOC  
16 and Reject Response Completeness measures, and these sub-metrics are  
17 included in the September "Met/Total" (519/574) percentage figure.

18

19 During the three-month period, July through September 2001, again adjusting  
20 for the three measures mentioned above, there were a total of 437 sub-  
21 metrics that had CLEC activity for all three months and that were compared  
22 with either benchmarks or retail analogues. Of these 437 sub-metrics, 388

1 sub-metrics (89%) satisfied the comparison criteria in at least two of the three  
2 months.

3  
4 Each sub-metric designated as having not satisfied the benchmark or  
5 BellSouth retail analogue requirement for July, August and/or September  
6 2001 is included in this Exhibit. Each sub-metric discussed is labeled as to  
7 what month(s) the missed criteria occurred (July/August/September).

8  
9 The following paragraphs will address specific performance measurements  
10 associated with each checklist item.

11

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

13

14 **1. Collocation**

15 BellSouth provides three separate collocation reports: 1) Average Response  
16 Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.  
17 Section E in Attachment 1D, Items E.1.1.1 through E.1.3.3, provides these  
18 results. BellSouth met the approved benchmarks for all of the sub-metrics  
19 with CLEC activity in August and September 2001. There was no CLEC  
20 activity for any of these measures in July 2001.

21

22 **2. Local Interconnection Trunking**

23 **Trunking Reports**

1 Attachment 1D, Section C, Items C.1.1 to C.4.2 of the September MSS  
2 contains data for ordering, provisioning, maintenance and repair, and billing  
3 associated with Local Interconnection Trunks.

4

5 In July, August and September 2001, BellSouth met the benchmarks/retail  
6 analogue comparisons for 14 of the 14, 15 of the 18 and 22 of the 22,  
7 respectively, local interconnection trunking sub-metrics having CLEC activity.

8 The sub-metrics that did not meet the retail analogue comparison in August  
9 2001 are as follows:

10

11 FOC Timeliness / Local Interconnection Trunks (C.1.3) (August)

12 BellSouth met the benchmark interval for 16 of the 17 orders in this sub-  
13 metric in August 2001. With a universe size of only 17 orders and a  
14 benchmark of 95%, a problem with only one order causes a benchmark miss  
15 for the entire sub-metric. BellSouth met the retail analogue comparison for  
16 this sub-metric in July and September 2001.

17

18 Service Order Accuracy / Local Interconnection Trunks / >= 10 Circuits /  
19 Dispatch (C.2.11.2.1) (August)

20 There were only two orders reviewed for this sub-metric in August 2001. This  
21 small universe size does not provide a conclusive benchmark comparison.  
22 BellSouth met the benchmark for this sub-metric in July 2001. There was no  
23 CLEC activity for this sub-metric in September 2001.

1

2 Customer Trouble Report Rate / Local Interconnection Trunks / Non-Dispatch

3 (C.3.2.2) (August)

4 There were 25 troubles reported in August 2001 for the 11,166 lines in  
5 service for this sub-metric. Both the CLECs and BellSouth retail received  
6 greater than 99.7% trouble free service for this sub-metric in August. When  
7 BellSouth provisions high quality service coupled with very large universe  
8 sizes, it can cause an apparent out of equity condition from a quantitative  
9 viewpoint. In these cases, there is very little variation and the universe size  
10 is so large that the Z-test becomes overly sensitive to any difference. In other  
11 words, the statistical test shows that the measurement does not meet the  
12 fixed critical value when compared with the retail analogue, but BellSouth's  
13 actual performance for both CLECs and its own retail operations is at a very  
14 high level – in this case over 99%. From a practical point of view, the CLECs'  
15 ability to compete has not been hindered even though the statistical results  
16 may technically show that BellSouth failed to meet the benchmark/analogue.  
17 BellSouth met the benchmark for this sub-metric in July and September 2001.

18

19 Trunk Blockage

20 BellSouth has developed a trunk blocking report that compares BellSouth  
21 retail's trunk blockage rates to those of CLECs. The report, Trunk Group  
22 Performance Report (TGP), Attachment 3D, displays trunk blocking in a  
23 manner that accurately represents the customer experience. The TGP report

1 tabulates actual call blocking as a percentage of call attempts for all  
2 comparable trunk groups administered by BellSouth that handle CLEC and  
3 BellSouth traffic. The TGP report provides a direct comparison of hour-by-  
4 hour blocking between CLEC and BellSouth trunk groups. Attachment 3D,  
5 Item C.5.1 (TGP), shows the actual trunk blocking percentages by hour for  
6 September 2001. The Analogue/Benchmark for the Trunk Group  
7 Performance measure is any consecutive two-hour period in 24 hours where  
8 CLEC blockage exceeds BellSouth blockage by more than 0.5%. BellSouth  
9 met or exceeded the retail analogue for this sub-metric in July, August and  
10 September 2001.

11  
12 **C. CHECKLIST ITEM 2 – UNBUNDLED NETWORK ELEMENTS (UNE)**

13  
14 This section addresses the measures associated with UNEs under checklist  
15 item 2. Attachment 1D, Sections B1 – B3, provides data that is divided into  
16 Ordering, Provisioning and Maintenance & Repair operations. The Ordering  
17 function is disaggregated into 17 sub-metrics. The Provisioning function has  
18 19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair  
19 function. All Ordering measures will be included in this checklist item  
20 because of the overall relationship of the mechanized, partially mechanized  
21 and manual processing of Local Service Requests (LSRs). The Provisioning  
22 and Maintenance & Repair measures for the following products are included  
23 in the checklist item as shown below:

<u>Product</u>	<u>Checklist Item:</u>
1 Combo (Loop & Port)	#2 – Unbundled Network Elements
2 Combo (Other)	#2 – Unbundled Network Elements
3 Other Design	#2 – Unbundled Network Elements
4 Other Non-Design	#2 – Unbundled Network Elements
5 xDSL Loop	#4 – Unbundled Local Loops
6 UNE ISDN Loop	#4 – Unbundled Local Loops
7 Line Sharing	#4 – Unbundled Local Loops
8 2w Analog Loop Design	#4 – Unbundled Local Loops
9 2w Analog Loop Non Design	#4 – Unbundled Local Loops
10 2w Analog Loop w/INP Design	#4 – Unbundled Local Loops
11 2w Analog Loop w/INP Non Design	#4 – Unbundled Local Loops
12 2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
13 2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops
14 Digital Loop < DS1	#4 – Unbundled Local Loops
15 Digital Loop => DS1	#4 – Unbundled Local Loops
16 Local Interoffice Transport	#5 – Unbundled Local Transport
17 Switch Ports	#6 – Unbundled Local Switching
18 INP Standalone	#11 – Local Number Portability
19 LNP Standalone	#11 – Local Number Portability
20	
21	
22 An overall review of the UNE sub-metrics for Ordering, Provisioning,	
23 Maintenance & Repair and Billing indicates that BellSouth met the	



1 benchmark/analogue for 91% of the sub-metrics during September, 88% of  
2 the sub-metrics in August and 89% of the sub-metrics in July 2001.

3

4 During the three-month period from July through September 2001, there were  
5 185 UNE sub-metrics that had data for all three months and were compared  
6 to benchmarks or retail analogues. Of those 185 sub-metrics, 167 (90%) sub-  
7 metrics met the relevant criteria in at least two of the three months.

8

9 **1. UNE Ordering Measures**

10

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

15

16 **Reject Interval**

17 Items B.1.4 - B.1.8 in Attachment 1D examine the Reject Interval for the  
18 month of September 2001. For orders submitted electronically, the  
19 benchmark is 97% within one hour. In July and August 2001, 95% and 96%,  
20 respectively, of the rejected service requests were delivered within the one-  
21 hour time period. In September 2001, 94% of rejected UNE electronic LSRs  
22 were returned within the one-hour benchmark.

23

1 For partially mechanized orders, which are LSRs submitted electronically and  
2 require service representative intervention, the benchmark for July was 85%  
3 within 18 hours. In July 2001, BellSouth exceeded this benchmark, with over  
4 99% of partially mechanized rejects being returned to the CLECs within the  
5 18-hour time period. Beginning with August 2001, the benchmark was  
6 changed to 85% within 10 hours. BellSouth exceeded the benchmark in  
7 August and September with 98% and 97%, respectively, of rejects for partially  
8 mechanized orders returned within the 10-hour period.

9

10 For manual orders, the current benchmark is 85% within 24 hours. BellSouth  
11 also exceeded this requirement, with 95%, 94% and 98% of the LSRs  
12 submitted manually being returned to the CLECs within the 24-hour time  
13 period in July, August and September 2001, respectively.

14

15 The following sub-metrics did not meet the established benchmarks in July  
16 August and/or September 2001:

17

18 Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3)  
19 (July/August/September)

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

1

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

9

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

21

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

1 There were only four orders for this sub-metric in July 2001. Such a small  
2 universe for this sub-metric does not provide a conclusive benchmark  
3 comparison. There were no rejected LSRs for this sub-metric in either August  
4 or September 2001.

5

6 Reject Interval / 2w Analog Loop Design / (B.1.4.8) (August/September)

7 There were only seven rejected LSRs for this sub-metric for August and 2  
8 rejected LSRs in September 2001. Such a small universe for this sub-metric  
9 does not provide a conclusive benchmark comparison. BellSouth met the  
10 retail analogue comparison for this sub-metric in July 2001.

11

12 Reject Interval / Other Design / Electronic (B.1.4.14) (July/August/September)

13 There were only four rejected LSRs for this sub-metric in July, only three  
14 rejected LSRs in August and only eight rejected LSRs in September 2001.  
15 Such a small universe for this sub-metric does not provide a conclusive  
16 benchmark comparison.

17

18 Reject Interval / LNP (Standalone) / Electronic (B.1.4.17) (September)

19 BellSouth met the one-hour benchmark for 14 of the 16 LSRs rejected in this  
20 sub-metric for September 2001. The 97% benchmark does not allow even  
21 one miss with this volume of LSRs. BellSouth met the benchmark for this  
22 sub-metric in July and August 2001.

23

1 Reject Interval / 2w Analog Loop w/LNP Design / Partially Mechanized

2 (B.1.7.12) (September)

3 There were only three rejected LSRs for this sub-metric in September 2001.  
4 Such a small universe for this sub-metric does not provide a conclusive  
5 benchmark comparison. There was no CLEC activity for this sub-metric in  
6 either July or August 2001.

7

8 Reject Interval / Other Design / Partially Mechanized (B.1.7.14) (August)

9 There were only four rejected LSRs in this sub-metric for August 2001. Such  
10 a small universe does not produce a statistically conclusive benchmark  
11 comparison. BellSouth met the benchmark comparison for this sub-metric in  
12 July and September 2001.

13

14 Reject Interval / xDSL / Manual (B.1.8.5) (September)

15 There were only five orders in this sub-metric for September 2001. Such a  
16 small universe does not produce a statistically conclusive benchmark  
17 comparison. BellSouth met the benchmark comparison for this sub-metric in  
18 July and August 2001.

19

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

21 BellSouth met the 24-hour benchmark for 15 of the 18 orders in this sub-  
22 metric in July and for 29 of the 35 orders in August 2001. The 85%  
23 benchmark required that 16 of the 18 rejects in July and 30 of the 35 rejects

1 for August be returned within the 24-hour period. The rejected LSRs taking  
2 longer intervals did not exhibit any distinct patterns or reveal any ordering  
3 process issues. BellSouth met the benchmark for this sub-metric in  
4 September 2001.

5  
6 FOC Timeliness

7 For LSRs submitted electronically, the benchmark is 95% of the FOCs  
8 returned within 3 hours. In July, August and September 2001, BellSouth  
9 returned 98%, 98% and 99%, respectively, of FOCs for electronically  
10 submitted LSRs within the 3-hour benchmark interval. For partially  
11 mechanized LSRs, the benchmark for July 2001 was 85% returned within 18  
12 hours. BellSouth met the benchmark in July, with 98% of the FOCs for this  
13 sub-metric returned within the 18-hour interval. Beginning with August 2001  
14 data, the benchmarks for the partially mechanized FOC Timeliness sub-  
15 metrics changed to 85% returned within 10 hours. BellSouth met the 10-hour  
16 benchmark in both August and September, with 97% of the FOCs returned for  
17 partially mechanized LSRs returned within the 10-hour benchmark period.  
18 For LSRs submitted manually, the benchmark is 85% returned within 36  
19 hours. In July, August and September 2001, BellSouth returned 99%, 97%  
20 and 99%, respectively, of the FOCs for manually submitted UNE LSRs within  
21 the 36-hour window. The sub-metrics that did not meet the benchmark in  
22 July, August and/or September are as follows:

1 FOC Timeliness / xDSL / Electronic (B.1.9.5) (July/August/September)

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

6

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

14

15 FOC Timeliness / Line Sharing / Partial Electronic (B.1.12.7) (August)

16 There was only one LSR associated with this sub-metric for August 2001.  
17 Such a small universe does not provide a conclusive benchmark comparison.  
18 There was no CLEC activity for this sub-metric in either July or September  
19 2001.

20

21 FOC Timeliness / 2w Analog Loop Design / Partial Electronic (B.1.12.8)  
22 (September)

1 There were only four LSRs associated with this sub-metric for September  
2 2001. Such a small universe does not provide a conclusive benchmark  
3 comparison. There was no CLEC activity for this sub-metric in July 2001.  
4 BellSouth met the benchmark for this sub-metric in August 2001.

5

6 FOC Timeliness / 2w Analog Loop w/LNP Design / Partial Electronic  
7 (B.1.12.12) (September)

8 There were only three LSRs associated with this sub-metric for September  
9 2001. Such a small universe does not provide a conclusive benchmark  
10 comparison. There was no CLEC activity for this sub-metric in July 2001.  
11 BellSouth met the benchmark for this sub-metric in August 2001.

12

13 FOC Timeliness / Other Design / Partial Electronic (B.1.12.14)  
14 (August/September)

15 There were only four LSRs associated with this sub-metric in August and only  
16 seven LSRs in September 2001. Such a small universe does not provide a  
17 conclusive benchmark comparison. There was no CLEC activity for this sub-  
18 metric in July 2001.

19

20 FOC Timeliness / Other Non-Design / Partial Electronic (B.1.12.15)  
21 (September)

22 There were only eleven LSRs associated with this sub-metric in September  
23 2001. Such a small universe does not provide a conclusive benchmark



1 comparison. There was no CLEC activity for this sub-metric in either July or  
2 August 2001.

3

4 FOC & Reject Response Completeness and FOC & Reject Response  
5 Completeness (Multiple Responses)

6 BellSouth has determined that the coding for the FOC & Reject  
7 Completeness and FOC & Reject Response Completeness (Multiple  
8 Responses) measures failed to include rejections that were classified as “auto  
9 clarifications.” BellSouth is in the process of rewriting the code to correct this  
10 problem, and the change will impact all FOC & Reject Completeness and  
11 FOC & Reject Response Completeness (Multiple Responses) measures.  
12 Effective with this Exhibit update for September data, the program coding has  
13 been corrected for all the FOC & Reject Completeness sub-metrics for  
14 Checklist Item No. 2, UNE Loop products except for: xDSL, 2w Analog Loop  
15 w/INP Design, 2w Analog Loop w/INP Non-Design, 2w Analog Loop w/LNP  
16 Design, 2w Analog Loop w/LNP Non-Design, INP (Standalone) and LNP  
17 (Standalone). The individual sub-metrics with correcting coding and that  
18 missed the required benchmarks in September 2001 will be addressed  
19 separately following the next section. BellSouth did not meet the benchmark  
20 in July, August and/or September 2001 for the FOC and Reject Response  
21 Completeness and FOC & Reject Response Completeness (Multiple  
22 Responses) metrics listed below:

23

- 1 FOC & Reject Response Completeness / Combo (Loop + Port) / Electronic
- 2 (B.1.14.3) (July)
- 3 FOC & Reject Response Completeness / xDSL / Electronic (B.1.14.5)
- 4 (August/September)
- 5 FOC & Reject Response Completeness / 2w Analog Loop Design /
- 6 Electronic (B.1.14.8) (July)
- 7 FOC & Reject Response Completeness / Other Design / Electronic
- 8 (B.1.14.14) (July)
- 9 FOC & Reject Response Completeness / xDSL / Partial Electronic (B.1.15.5)
- 10 (July/August/September)
- 11 FOC & Reject Response Completeness / Local Interoffice Transport / Manual
- 12 (B.1.16.2) (August)
- 13 FOC & Reject Response Completeness / xDSL / Manual (B.1.16.5) (August)
- 14 FOC & Reject Response Completeness / Line Sharing / Manual (B.1.16.7)
- 15 (August)
- 16 FOC & Reject Response Completeness / 2w Analog Loop Non-Design /
- 17 Manual (B.1.16.9) (August)
- 18 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
- 19 & Port) / Electronic (B.1.17.3) (August/September)
- 20 FOC & Reject Response Completeness (Multiple Responses) / xDSL /
- 21 Electronic (B.1.17.5) (July)
- 22 FOC & Reject Response Completeness (Multiple Responses) / Other Design
- 23 / Electronic (B.1.17.14) (September)

1 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop  
2 & Port) / Partial Electronic (B.1.18.3) (August/September)  
3 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /  
4 Partial Electronic (B.1.18.7) (August)  
5 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog  
6 Loop Design / Partial Electronic (B.1.18.8) (August/September)  
7 FOC & Reject Response Completeness (Multiple Responses) / Other Design  
8 / Partial Electronic (B.1.18.14) (July/August/September)  
9 FOC & Reject Response Completeness (Multiple Responses) / Other Non  
10 Design / Partial Electronic (B.1.18.15) (September)  
11 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop  
12 + Port) / Manual (B.1.19.3) (July/August)  
13 FOC & Reject Response Completeness (Multiple Responses) / UNE ISDN /  
14 Manual (B.1.19.6) (September)  
15 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /  
16 Manual (B.1.19.7) (September)  
17 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog  
18 Loop Design / Manual (B.1.19.8) (July/September)  
19 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog  
20 Loop Non Design / Manual (B.1.19.9) (July/September)  
21 FOC & Reject Response Completeness (Multiple Responses) / Other Design  
22 / Manual (B.1.19.14) (September)

1 BellSouth has determined that the coding for the FOC & Reject  
2 Completeness and FOC & Reject Response Completeness (Multiple  
3 Responses) measures failed to include rejections that were classified as “auto  
4 clarifications.” BellSouth is in the process of rewriting the code to correct this  
5 problem, and the change will impact all FOC & Reject Completeness and  
6 FOC & Reject Response Completeness (Multiple Responses) measures.

7

8 The following FOC & Reject Response Completeness sub-metrics, for which  
9 the program code has been corrected, did not meet the benchmarks for  
10 September:

11

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

14 BellSouth met the benchmark standard for 18 of the 19 (94.74%) responses  
15 for this sub-metric in September 2001. Normal rounding conventions would  
16 indicate that this small difference is not significantly different from the 95%  
17 benchmark level. With a universe size of only 19 orders and a 95%  
18 benchmark, a problem with only one order causes a miss for the entire sub-  
19 metric. BellSouth continues to focus on this measurement in order to improve  
20 results to meet the benchmark.

21

22 FOC & Reject Response Completeness / Line Sharing / Manual (B.1.16.7)  
23 (September)

1 BellSouth met the benchmark standard for 52 of the 56 (92.86%) responses  
2 for this sub-metric in September 2001. BellSouth continues to focus on this  
3 measurement in order to improve results to meet the benchmark.

4

5 FOC & Reject Response Completeness / 2w Analog Loop Non-Design /  
6 Manual (B.1.16.9) (September)

7 BellSouth met the benchmark standard for 17 of the 18 (94.44%) responses  
8 for this sub-metric in September 2001. With a universe size of only 18 orders  
9 and a 95% benchmark, a problem with only one order causes a miss for the  
10 entire sub-metric. BellSouth continues to focus on this measurement in order  
11 to improve results to meet the benchmark.

12

13 FOC & Reject Response Completeness / Other Non-Design / Manual  
14 (B.1.16.15) (September)

15 BellSouth met the benchmark standard for 42 of the 45 (93.33%) responses  
16 for this sub-metric in September 2001. BellSouth continues to focus on this  
17 measurement in order to improve results to meet the benchmark.

18

19

20 Flow-Through

21 Attachment 1D, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated  
22 by customer type and for the Summary/Aggregate. Detailed flow-through  
23 results for individual CLECs are included in Attachment 2D. The following

1 table shows the Regional Flow-Through results for July, August and  
2 September 2001 as compared with the Interim SQM benchmarks.

3

4 % Flow-through Service Requests (F.1.1.1 – F.1.3.4)

<u>Customer Type</u>	<u>July 2001</u>	<u>August 2001</u>	<u>September 2001</u>	<u>Benchmark</u>
Residence	81.69%	90.86%	90.39%	95%
Business	60.99%	72.14%	68.47%	90%
UNE	67.29%	80.82%	79.33%	85%
LNP	86.36%	84.40%	86.96%	85%

Note: July and August figures reflect revised data included in Revised Attachment 2B  
and Revised Attachment 2C. September figures are included in Attachment 2D.

5

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

13

14 BellSouth has established a Flow-Through Improvement Program  
15 Management process that includes seven different internal organizations.

16 Ongoing analysis is being done to determine trends and identify flow-through

1 problems. To date, fifteen system enhancements have been identified and  
2 are targeted for Encore releases. Three of the enhancements were  
3 implemented in August. The remainder of the enhancements are scheduled  
4 for release between October 2001 and January 2002.

5

6 **2. UNE Provisioning Measures**

7 BellSouth met 87% of the overall UNE Provisioning measurements in July,  
8 84% in August and 94% in September 2001. The following sub-metrics did  
9 not meet the applicable retail analogues in the months of July, August and/or  
10 September 2001:

11

12 Order Completion Interval / Combo (Loop & Port) / < 10 Circuits / SBO

13 (B.2.1.3.1.3) (August)

14 The average OCI for CLECs for this sub-metric was 0.38 days in August 2001  
15 as compared to 0.33 days for the retail analogue. One order in this sub-  
16 metric took 41 days to clear. It was a record only order and should not have  
17 been included in the measurement. With the exclusion this order, BellSouth  
18 would have met the analogue comparison for this sub-metric. BellSouth met  
19 the retail analogue comparison for this sub-metric in July and September  
20 2001.

21

22 Held Orders / Combo (Loop & Port) / < 10 Circuits / Facility (B.2.3.3.1.1)

23 (August/September)

1 There was only one order for this sub-metric in August and two orders for  
2 September 2001. Such a small universe does not provide a statistically  
3 conclusive comparison to the retail analogue. BellSouth met the retail  
4 analogue for this sub-metric in July 2001.

5

6 % Jeopardy Notice Interval  $\geq$  48 hours / Combo (Loop & Port) /  $<$  10  
7 Circuits (B.2.10.3) (July/August)

8 The calculations for this measure have been determined to be incorrect. The  
9 coding change in the Service Order Control System (SOCS) was  
10 implemented in a September 13, 2001, system load. The October data  
11 month will be the first full month that the change will be in effect.

12

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

15 Missed Installation Appointments / Combo (Loop & Port) /  $<$  10 Circuits /  
16 Dispatch In (B.2.18.3.1.4) (July)

17 BellSouth met 2,024 of the 2,029 (99.75%) of the total CLEC installation  
18 appointments scheduled for this sub-metric in July 2001. The 5 missed  
19 appointments were in the "Dispatch In" disaggregation (1,295 met out of  
20 1,300 scheduled, or 99.6%). When BellSouth provisions high quality service  
21 coupled with very large universe sizes, it can cause an apparent out of equity  
22 condition from a quantitative viewpoint. In these cases, there is very little  
23 variation and the universe size is so large that the Z-test becomes overly



1 sensitive to any difference. In other words, the statistical test shows that the  
2 measurement does not meet the fixed critical value when compared with the  
3 retail analogue, but BellSouth's actual performance for both CLECs and its  
4 own retail operations is at a very high level – in this case over 99%. From a  
5 practical point of view, the CLECs' ability to compete has not been hindered  
6 even though the statistical results may technically show that BellSouth failed  
7 to meet the benchmark/analogue. BellSouth met the retail analogue  
8 comparisons for these sub-metrics for August and September 2001.

9  
10 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /  
11 Non-Dispatch (B.2.19.3.1.2) (July/August)

12 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /  
13 SBO (B.2.19.3.1.3) (August)

14 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / < 10 Circuits /  
15 Dispatch In (B.2.19.3.1.4) (August)

16 Items B.2.19.3.1.3 and B.2.19.3.1.4 are further disaggregations of Item  
17 B.2.19.3.1.2. There were a total of 66 trouble reports for the 1,132 orders in  
18 this sub-metric that completed in the 30 days prior to July 2001. In August  
19 2001, there were 109 total troubles reported for the 2, 029 orders completed  
20 in the prior 30 days. Of the total 109 troubles, 46 troubles were for Switched  
21 Base Orders and 63 were from Dispatch In orders. Of the total 109 trouble  
22 reports, 39 reports (36%) were closed to "TOK/FOK." No distinct patterns or  
23 systemic problems were revealed in analyzing the data from these orders.

1 BellSouth met the retail analogue comparisons for these sub-metrics in  
2 September 2001.

3

4 Service Order Accuracy / Design (Specials) / < 10 Circuits / Dispatch  
5 (B.2.34.1.1.1) (July/August/September)

6 BellSouth met the standard for 9 of the 27 orders reviewed in this sub-metric  
7 for July, for 47 of the 51 orders in August and for 32 of the 36 orders reviewed  
8 in September 2001. The 95% benchmark set requirements of 26, 49 and 35  
9 orders for the months of July, August and September 2001, respectively,  
10 based on the monthly quantity of orders for this sub-metric. BellSouth  
11 continues to focus on this measurement in order to improve results to meet  
12 the benchmark.

13

14 Service Order Accuracy / Design (Specials) / < 10 Circuits / Non-Dispatch  
15 (B.2.34.1.1.2) (August)

16 There were only six orders reviewed for this sub-metric for August 2001. The  
17 small universe for this sub-metric does not provide a conclusive benchmark  
18 comparison. BellSouth met the benchmark for this sub-metric in July and  
19 September 2001.

20

21 Service Order Accuracy / Loops Non-Design / < 10 Circuits / Dispatch  
22 (B.2.34.2.1.1) (September)

1 There were only four orders reviewed for this sub-metric for September 2001.  
2 The small universe for this sub-metric does not provide a conclusive  
3 benchmark comparison. There was no CLEC activity for this sub-metric in  
4 July 2001. BellSouth met the benchmark for this sub-metric in August 2001.

5

6 Service Order Accuracy / Loops Non Design / < 10 Circuits / Non Dispatch  
7 (B.2.34.2.1.2) (August)

8 BellSouth met 29 of the 36 orders reviewed for this sub-metric in August  
9 2001. The 95% benchmark set a requirement of 35 orders for the month of  
10 August 2001, based on the number of orders reviewed for the sub-metric.  
11 BellSouth continues to focus its efforts on meeting this measure. BellSouth  
12 met the benchmark comparison for this sub-metric in July and September  
13 2001.

14

15 BellSouth met all other UNE provisioning measures for the sub-metrics  
16 included in this checklist item for July, August and September 2001.

17

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

19 BellSouth met the applicable performance standard for 90% for July, 96% for  
20 August and 98% for September 2001 of the overall UNE M&R  
21 measurements. The UNE M&R sub-metrics that did not meet the fixed critical  
22 value for this checklist item are as follows:

23

1 Customer Trouble Report Rate / Combo Other / Non-Dispatch (B.3.2.4.2)

2 (August)

3 There were 4 trouble reports in August for the 82 lines in service for this sub-  
4 metric. Both the CLECs and BellSouth retail received over 95% trouble free  
5 service for this sub-metric in August 2001. BellSouth met the retail analogue  
6 comparison for this sub-metric in July and September 2001.

7

8 Customer Trouble Report Rate / Other Non-Design / Non-Dispatch

9 (B.3.2.11.2) (September)

10 There were 8 troubles reported for the 272 lines in service for this sub-metric  
11 in September 2001. Both the CLECs and BellSouth retail had greater than  
12 97% trouble free service for all in service lines in this sub-metric in  
13 September. BellSouth met the retail analogue comparison for this sub-metric  
14 in July and August 2001.

15

16 % Repeat Troubles within 30 Days / Other Non-Design / Non-Dispatch

17 (B.3.4.11.2) (July)

18 There were only 3 trouble reports for this sub-metric in July 2001. Such a  
19 small universe does not provide a statistically conclusive comparison with the  
20 retail analogue. BellSouth met the retail analogue comparison for this sub-  
21 metric in August and September 2001.

22

23 **4. Other UNE Measures**

1

2 **Pre-Ordering**

3 Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1) and  
4 Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering  
5 measurements. All measures met the established benchmarks for July,  
6 August and September 2001.

7

8 **Operations Support Systems**

9 The OSS/Preordering measures for which BellSouth did not meet the  
10 benchmark/retail analogue in July, August and/or September 2001 were:

11

12 Average Response Interval – CLEC (LENS) / HAL / CRIS / Region / RNS  
13 (D.1.3.5.1) (July)

14 Average Response Interval – CLEC (LENS) / HAL / CRIS / Region / ROS  
15 (D.1.3.5.2) (July)

16 A detailed analysis has identified a problem in the LENS software that deals  
17 with response times from HAL/CRIS. This was corrected in an update  
18 released on July 28, 2001. BellSouth met the retail analogue comparison for  
19 these sub-metrics in August and September 2001.

20

21 Average Response Interval – CLEC (TAG) / HAL / CRIS / Region / RNS  
22 (D.1.4.7.1) (July)

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

2 (D.1.4.7.2) (July)

3 BellSouth is currently investigating the results for July. There was basically,  
4 one tenth of one percent difference for this measure between the CLEC and  
5 retail results. BellSouth met the retail analogue comparison for these sub-  
6 metrics in August and September 2001.

7

8 Average Response Interval / CRIS / Region (D.2.4.1.1)

9 (July/August/September)

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

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

18 Both the CLECs and the retail analogue received approximately 99% within  
19 the less than 10 second response interval. Similarly, for the greater than 10  
20 seconds interval measure, the CLECs and the BellSouth retail analogue  
21 received approximately 1% of responses in over 10 seconds. These very  
22 small differences in response intervals indicate equivalent service levels for  
23 the CLECs and BellSouth retail.

1

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

3 (July/August/September)

4 The average response intervals for these sub-metrics are measured in three  
5 separate disaggregations -- the percentage of queries that are responded to  
6 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.  
7 For all three measurements, the results are virtually identical, with the less  
8 than 4 seconds measure having a difference of 0.03% in July, of 0.15% in  
9 August and 0.88% in September and the less than 10 seconds interval and  
10 the greater than 10 second interval having differences of only 0.01% in July,  
11 of 0.03% in August and 0.26% in September. These results indicate virtually  
12 equivalent service levels for both the CLECs and BellSouth retail.

13

14 Average Response Interval / LMOSupd / Region (D.2.4.5.1, D.2.4.5.2,

15 D.2.4.5.3) (July/August/September)

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 For each of the three sub-metrics, there was less than a 3% difference in the  
20 responses received by the CLECs and BellSouth retail in each month.  
21 Differences of less than 3% for all of these intervals indicate virtually  
22 equivalent service levels for both the CLECs and BellSouth retail.

23

1 Average Response Interval / LNP/ Region (D.2.4.6.1) (July/August)

2 Average Response Interval / LNP/ Region (D.2.4.6.2, D.2.4.6.3) (September)

3 The average response interval for this measurement is measured in three  
4 separate disaggregations -- the percentage of queries that are responded to  
5 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.  
6 In all four months, the average response interval for the CLEC requests did  
7 not meet the retail analogue intervals for the less than 4-second  
8 disaggregation but exceeded both the less than 10 and greater than 10  
9 seconds responses. In July, August and September 2001, both the CLECs  
10 and BellSouth retail received over 99.4% of responses in less than 4 seconds  
11 and less than 0.2% in more than 10 seconds. The less than one-half percent  
12 difference for these intervals indicates virtually equivalent service levels for  
13 the CLECs and BellSouth retail.

14

15 Average Response Interval / MARCH / Region (D.2.4.7.1, D.2.4.7.2,  
16 D.2.4.7.3) (August)

17 The average response interval for this sub-metric is measured in three  
18 separate disaggregations -- the percentage of queries that are responded to  
19 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.  
20 BellSouth missed the retail analogue comparison for this measure in August  
21 but met the retail analogue comparison for these sub-metrics in July and  
22 September 2001.

23



1 Average Response Interval / OSPCM / Region (D.2.4.8.1) (July/August)

2 Average Response Interval / OSPCM / Region (D.2.4.8.2, D.2.4.8.3)  
3 (August/September)

4 The average response interval for these sub-metrics is measured in three  
5 separate disaggregations -- the percentage of queries that are responded to  
6 in less than 4 seconds, less than 10 seconds and greater than 10 seconds.  
7 In July, August and September 2001, the CLEC response intervals were  
8 34.75%, 35.16% and 44.19% within 4 seconds as compared to 45.00%,  
9 43.74% and 42.76%, respectively, for the retail analogue. For the less than  
10 10 second response interval, the CLECs received 96.61%, 93.75% and  
11 94.19% of their responses and the retail analogue received 97.54%, 97.38%  
12 and 97.18% in July, August and September, respectively. For the greater  
13 than 10 second response interval, the CLECs received 3.39%, 6.25% and  
14 5.81% of their responses and the retail analogue received 2.48%, 2.62% and  
15 2.82% in July, August and September, respectively. With activity levels of  
16 only 118, 128 and 86 requests from this system for the three months, only  
17 one to five additional responses within 10 seconds would have brought the  
18 sub-metric into parity with the retail analogue.

19  
20 Average Response Interval / NIW / Region (D.2.4.11.1) (August)

21 The average response interval for this sub-metric is 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 In August, the average response interval for the CLEC requests did not meet  
2 the retail analogue intervals for the less than 4-second disaggregation but  
3 exceeded both the less than 10 and greater than 10 seconds responses. The  
4 CLEC response interval was 77.81% within 4 seconds as compared with  
5 79.85% for the retail analogue. For the less than 10 second responses, the  
6 CLECs received 99.61% of their responses and the retail analogue received  
7 99.53%. BellSouth met the retail analogue comparison for this sub-metric in  
8 July and September 2001.

9

10 **General – Billing**

11 **Usage Data Delivery Timeliness (F.9.2) (July/August)**

12 This measure tracks the percentage of usage data delivered within six  
13 calendar days for both BellSouth retail and the CLEC aggregate. The CLECs  
14 experienced usage data delivery timeliness rates that were slightly lower than  
15 the rates for BellSouth customers during July and August 2001 (98.95% for  
16 BellSouth versus 96.62% for CLECs in July and 98.80% for BellSouth  
17 compared to 98.30% for CLECs in August). The difference in performance  
18 was the result of some input files being left out of the ADUF job before the  
19 files were recovered and processed. It is important to point out that the CLEC  
20 result of 96.62% still provides the CLECs a meaningful opportunity to  
21 compete. BellSouth has developed a fix that should prevent this type of error  
22 from occurring in the future. The fix was implemented on September 1, 2001.

1 BellSouth met the retail analogue comparison for this sub-metric in  
2 September 2001.

3

4 Mean Time to Deliver Usage (F.9.4) (July/August)

5 This measure compares the average number of days to deliver usage to  
6 CLECs with the BellSouth retail analogue. In July 2001, the BellSouth result  
7 was 3.37 days compared to the CLEC result of 3.83, and in August the CLEC  
8 result was 3.60 days compared to BellSouth's 3.37 days as a result of some  
9 input files being left out of the ADUF job before the files were recovered and  
10 processed. While the CLEC measurement is slightly greater than the  
11 BellSouth results, the CLECs are provided with substantially the same  
12 opportunity to bill end users as is BellSouth. BellSouth met or exceeded the  
13 retail analogue for this sub-metric in September 2001.

14

15 Recurring Charge Completeness / UNE (F.9.5.2) (July/September)

16 This measure tracks the ability of the ordering and billing systems to begin  
17 billing a CLEC recurring charges for UNE services on the next invoice after an  
18 order has "completed". For UNE, the goal is to meet a benchmark of 90%.  
19 The CLEC result for July 2001 was slightly below the benchmark of 90% but  
20 significantly exceeded this benchmark with a 97.56% result in August. In  
21 September 2001, the result was 86.44%. The benchmark was not met in  
22 September because of problems encountered in correcting some service  
23 order problems in a timely manner. The difference between the benchmark

1 and the CLEC result does not impair a CLEC's ability to support its own end  
2 users or to effect billing to those end users in any meaningful way.

3

4 Recurring Charge Completeness / Interconnection (F.9.5.3) (July/September)

5 The CLEC result for July 2001 was slightly below the benchmark of 90% but  
6 significantly exceeded this benchmark with a 99.30% result in August. In  
7 September 2001, the result for this measure was 31.94% against a  
8 benchmark of 90%. This result was negatively impacted by service orders  
9 issued to move billed amounts from one billing account to another connected  
10 with CLECs which have filed for bankruptcy. These orders were backdated  
11 several months to the date of the bankruptcy. None of these orders impacted  
12 the CLECs' total billed amounts but were issued to separate pre-bankruptcy  
13 billed amounts from post-bankruptcy amounts. The CLECs are provided with  
14 a meaningful opportunity to compete as these issues do not impede the ability  
15 to serve end users.

16

17 Non-Recurring Charge Completeness / Interconnection (F.9.6.3)

18 (July/August/September)

19 This measure tracks the ability of the ordering and billing systems to begin  
20 billing a CLEC non-recurring charges for local interconnection services on the  
21 next invoice after an order has "completed". A benchmark of 90% has been  
22 set as the level of performance to meet. In July 2001, BellSouth's  
23 performance was 40.86% but improved to 88.16% in August. In September

1 2001, the result was 88.27%. The benchmark was not met in September  
2 because of problems encountered in correcting some service order problems  
3 in a timely manner. The difference between the benchmark and the CLEC  
4 result does not impair a CLEC's ability to support its own end users or to  
5 effect billing to those end users in any meaningful way.

6

7 **General - Change Management**

8 % Change Management Documentation Sent On Time (F.10.3) (July/August)

9 Average Documentation Release Delay Days (F.10.5) (July/August)

10 Two of the four change management documentation letters issued in July and  
11 one of the three letters issued in August 2001 were released with less than  
12 the 30-day benchmark window. All of these letters were, however, primarily  
13 dealing with clarifications and information on existing documentation and/or  
14 business rules and did not require CLEC coding changes. There was no  
15 activity for these sub-metrics in September 2001.

16

17 **General – New Business Requests**

18 % Quotes Provided in 10 Business Days (F.11.2.1) (July/September)

19 There were only three requests processed in July and only seven requests  
20 processed in September 2001 in sub-metric F.11.2.1. Such a small universe  
21 does not provide a statistically conclusive benchmark comparison. This is a  
22 regional measure and none of the requests were processed in Kentucky.  
23 BellSouth met the benchmark for this sub-metric in August 2001.

1

2 **General – Ordering**

3 % Acknowledgement Message Timeliness / EDI (F.12.1.1) (August)

4 In August 2001, BellSouth returned almost 81,000 acknowledgement  
5 messages within the 30-minute benchmark period. With a 95% benchmark,  
6 almost 82,000 messages would need to meet the criteria. BellSouth met or  
7 exceeded the retail analogue for this sub-metric in both July and September  
8 2001.

9

10 % Acknowledgement Message Completeness / EDI (F.12.2.1)  
11 (July/August/September)

12 In July 2001, problems occurred on only 39 (0.05%) of the total 78,663  
13 messages returned in this sub-metric. BellSouth failed to satisfy the  
14 completeness criteria for 302 of the 86,217 messages returned in August  
15 2001. In September 2001, there were only 2 failed messages (0.003%) of the  
16 67,850 total messages returned for the month. A Stability Plan to improve  
17 EDI availability has been put into effect. This plan includes implementing  
18 both a manual application monitoring schedule (24 / 7) and increased  
19 mechanized application alarms to more adequately monitor and react to  
20 application outages. The database parameters have also been adjusted to  
21 allow for maximum processing in the EDI system.

22

1 % Acknowledgement Message Completeness / TAG (F.12.2.2)

2 (July/August/September)

3 BellSouth failed to deliver 485 (0.3%) of the 194,073 messages in July, 20  
4 (0.01%) of the 199,829 messages in August and 5 (0.003%) of the 167,159  
5 messages in September 2001 for this sub-metric. Analysis continues to  
6 identify any issues in this process. However, such a small number of failed  
7 records have not revealed any systemic process problems.

8

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

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

13

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

20

21 **xDSL Group**

22

23 **1. Provisioning Measures**

1 The provisioning sub-metrics that did not meet the retail analogues in July,  
2 August and/or September are as follows:

3

4 % Missed Installation Appointments / Line Sharing / < 10 Circuits / Non-  
5 Dispatch (B.2.18.7.1.2) (August)

6 BellSouth met the scheduled appointment due dates for 31 of 32 orders for  
7 this sub-metric in August 2001. The one missed appointment did not reveal  
8 any systemic installation issues. BellSouth met the retail analogue  
9 comparison for this sub-metric in July and September 2001.

10

11 % Provisioning Troubles w/i 30 Days / UNE ISDN / < 10 Circuits / Dispatch  
12 (B.2.19.6.1.1) (July)

13 There were 5 troubles reported for the 36 orders that completed in the 30  
14 days prior to July 2001 for this sub-metric. There was no systemic problem  
15 identified for the troubles that were analyzed in July. BellSouth met the retail  
16 analogue comparison for this sub-metric in August and September 2001.

17

## 18 **2. Maintenance & Repair Measures**

19

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

21 There were only four orders associated with this sub-metric in July 2001.

22 Such a small universe for this sub-metric does not provide a statistically



1 conclusive comparison to the retail analogue. BellSouth met the retail  
2 analogue comparison for this sub-metric in August and September 2001.

3

4 Customer Trouble Report Rate / xDSL Loops / Non Dispatch (B.3.2.5.2)  
5 (August)

6 The CLEC aggregate only reported two troubles for this sub-metric in August  
7 2001. Both the CLECs and BellSouth retail had greater than 99% trouble free  
8 service for all in service lines in this sub-metric in August. BellSouth met the  
9 retail analogue for this sub-metric in July and September 2001.

10

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

12 The CLEC aggregate only reported 15 troubles for this sub-metric in July  
13 2001. Both the CLECs and BellSouth retail had greater than 97% trouble free  
14 service for all in service lines in this sub-metric in July. BellSouth met or  
15 exceeded the retail analogue for this sub-metric in August and September  
16 2001.

17

18 Customer Trouble Report Rate / Line Sharing / Non Dispatch (B.3.2.7.2)  
19 (July/August)

20 The CLEC aggregate only reported eight troubles for this sub-metric in July  
21 and three troubles in August 2001. Both the CLECs and BellSouth retail had  
22 greater than 95% trouble free service for all in service lines in this sub-metric

1 in July and over 98% trouble free services in August 2001. BellSouth met the  
2 retail analogue comparison for this sub-metric in September 2001.

3

4 Maintenance Average Duration / UNE ISDN / Non-Dispatch (B.3.3.6.2)  
5 (July/September)

6 There were only a total of four troubles reported for this sub-metric in July and  
7 two troubles reported in September 2001. Such a small universe does not  
8 produce a statistically conclusive comparison with the retail analogue.  
9 BellSouth met the retail analogue comparison for this sub-metric in August  
10 2001.

11

12 Out of Service > 24 Hours / xDSL / Dispatch (B.3.5.5.1) (July)

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

17

18 Out of Service > 24 Hours / UNE ISDN / Non-Dispatch (B.3.5.6.2) (July)

19 There were only four orders associated with this sub-metric in July 2001.  
20 Such a small universe for this sub-metric does not provide a statistically  
21 conclusive comparison to the retail analogue. BellSouth met the retail  
22 analogue comparison for this sub-metric in August and September 2001.

23

1 **SL1/SL2/Digital Loop Group**

2

3 BellSouth met the benchmarks/retail analogues for all maintenance & repair  
4 sub-metrics for the SL1/SL2/Digital Loop Group in July, August and  
5 September 2001. The provisioning sub-metrics that did not meet the retail  
6 analogue for this group in July, August and/or September 2001 are:

7

8 Held Order Interval / Digital Loop >=DS1 / < 10 Circuits / Facility  
9 (B.2.3.19.1.1) (August)

10 There was only one order held passed its due date for this sub-metric in  
11 August 2001. This order was resolved in 2 days. The small universe size for  
12 this sub-metric does not provide a statistically conclusive comparison to the  
13 retail analogue. BellSouth met or exceeded the retail analogue comparison  
14 for this sub-metric in July and September 2001.

15

16 % Jeopardies / Digital Loop >= DS1 / Electronic (B.2.5.19)  
17 (August/September)

18 There were only 9 orders associated with this sub-metric in August and 11  
19 orders in September 2001. Even though six of the nine orders for August and  
20 six of the eleven orders for September were shown in jeopardy status, all but  
21 one of the August jeopardies and all but one of the September orders were  
22 resolved prior to the due dates and the orders were worked as scheduled.

23 The small universe size for this sub-metric does not provide a statistically

1 conclusive comparison to the retail analogue. BellSouth met the retail  
2 analogue comparison for this sub-metric in July 2001.

3

4 % Provisioning Troubles within 7 Days – Hot Cuts / UNE Loop Design /  
5 Dispatch (B.2.17.1.1) (July)

6 There were only eight orders associated with this sub-metric in July 2001.  
7 Such a small universe does not provide a conclusive benchmark comparison.  
8 BellSouth met the retail analogue comparison for this sub-metric in August  
9 2001. There was no CLEC activity for this sub-metric in September 2001.

10

11 % Missed Installation Appointments / Digital Loops >= DS1 / < 10 Circuits /  
12 Dispatch (B.2.18.19.1.1) (September)

13 There was only one missed appointment for the fourteen scheduled orders for  
14 this sub-metric in September 2001. There was no systemic installation issue  
15 for the missed appointment. BellSouth met the retail analogue for this sub-  
16 metric in July and August 2001.

17

18 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Design / < 10 Circuits  
19 / Dispatch (B.2.19.8.1.1) (August)

20 There were 3 troubles reported for the 13 orders completed in the 30 days  
21 prior to August 2001 for this sub-metric. There were no systemic installation  
22 issues revealed by these troubles. BellSouth met the retail analogue  
23 comparison for this sub-metric in July and September 2001.

1

2 % Provisioning Troubles w/i 30 Days / Digital Loops < DS1 / < 10 Circuits /  
3 Dispatch (B.2.19.18.1.1) (July/August)

4 There were 6 troubles reported for the 58 orders that completed in the 30  
5 days prior to July and 10 troubles reported for the 104 orders that completed  
6 in the 30 days prior to August 2001 for this sub-metric. There were no  
7 systemic problems identified for the troubles that were analyzed in these two  
8 months. BellSouth met the retail analogue comparison for this sub-metric in  
9 September 2001.

10

11 Average Completion Notice Interval / 2w Analog Loop Design / < 10 Circuits /  
12 Dispatch (B.2.21.8.1.1) (July/August/September)

13 There were only 10 completions in this sub-metric in July, 11 completions in  
14 August and 7 completions in September 2001 for this sub-metric. The root  
15 cause analysis of these measures indicated that the only differences between  
16 the performance comparing BellSouth retail and CLECs are the mismatches  
17 found when the orders are compared with the original LSRs. The start of the  
18 completion interval is the point at which the technician completes the order,  
19 and the interval ends when the completion notice is sent. Any change to a  
20 name, number of items, etc., occurring during the provisioning process will  
21 generate inconsistencies with the original LSRs that must be resolved before  
22 a final completion notice can be sent. Any time to resolve these  
23 inconsistencies with the original LSRs is included in the average. Because of

1 numerous CLEC changes and order updates, mismatches on CLEC orders  
2 exceed those for BellSouth retail orders. Combining this with the smaller base  
3 for the CLECs' measurement raises the average, which sometimes results in  
4 a miss. Specific Service Representatives within the Work Management  
5 Centers have been assigned to resolve any completion issues that are  
6 required. Providing specific training and dedicating personnel to this task  
7 should reduce the difference between the CLEC and retail analogue results.

8

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

10

11 The data in these measures indicate that BellSouth met the  
12 benchmark/analogue requirements for all measurements in Checklist Item 5  
13 for July, August and September 2001.

14

15

16 **F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING**

17

18 The data in these measures indicate that BellSouth met the  
19 benchmark/analogue requirements for all measurements in Checklist Item 6  
20 for July, August and September 2001.

21

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

2                   **H. CHECKLIST ITEM 7b – DIRECTORY ASSISTANCE/OPERATOR**

3                                   **SERVICES**

4  
5                   As indicated in Attachment 1D, Sections F.6, F.7 and F.8, BellSouth met the  
6                   benchmark/analogue requirements of Checklist Items 7a and 7b in  
7                   September 2001, as it had in July and August. Even though BellSouth tracks  
8                   and reports these measures, the processes used in providing these services  
9                   are designed to provide parity for all users.

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

12                                   **SIGNALING**

13                   BellSouth met the required benchmarks for three of the four sub-metrics  
14                   associated with this checklist item in July and August and for two of the four  
15                   sub-metrics in September 2001. See items F.13.3.1 through F.13.3 in  
16                   Attachment 1D for further details. The sub-metrics that did not meet the  
17                   appropriate benchmark in July, August and/or September 2001 are as  
18                   follows:

19  
20                   **% Update Accuracy / Directory Listings (F.13.2.2) (September)**

21                   The results in this sub-metric are based on a statistical sample of LSRs and  
22                   service orders, which are manually checked for the accuracy of information  
23                   that impacts the Directory Listings database. The September 2001 results

1 were based on a sample size of 34 orders, of which 4 orders were found to  
2 contain errors. BellSouth has refocused its effort on all LSRs processed in  
3 the partial mechanized and manual categories to eliminate basic errors made  
4 by the representatives that should meet the benchmark for this sub-metric.  
5 BellSouth met the benchmark for this sub-metric in July and August 2001.

6

7 % NXXs / LRNs Loaded by LERG Effective Date (Region) (F.13.3)

8 (July/August/September)

9 The measure indicated that only 152 of the 153 NXXs were loaded by their  
10 effective date for the entire BellSouth region in July, 23 of 24 NXXs loaded by  
11 their effective date in August and 39 of 40 NXXs loaded by their effective date  
12 in September 2001. This is a regional measure. There were no missed dates  
13 in Kentucky for this sub-metric in July and August 2001. In September 2001,  
14 BellSouth Kentucky loaded 6 of 7 NXXs by their LERG effective date. The  
15 one missed due date did not reveal any data base load process issues.

16

17 **J. CHECKLIST ITEM 11 – NUMBER PORTABILITY**

18

19 All the measurements in this Checklist Item were met or exceeded for July,  
20 August and/or September 2001 except for the following:

21

22 Order Completion Interval / LNP (Standalone) / >= 10 Circuits / Non-

23 Dispatch (B.2.1.17.2.2) (July)



1 There were only three orders for this sub-metric in July 2001. Such a small  
2 universe does not provide a statistically conclusive comparison to the retail  
3 analogue. BellSouth met the retail analogue comparison for this sub-metric in  
4 August 2001. There was no CLEC activity for this sub-metric in September  
5 2001.

6

7 % Missed Installation Appointments / LNP (Standalone) / < 10 Circuits / Non-  
8 Dispatch (B.2.18.17.1.2) (July/August)

9 BellSouth missed 3 of the 528 orders scheduled for this sub-metric in July  
10 and 2 of the 717 orders scheduled in August 2001. The CLECs and  
11 BellSouth retail had over 99.4% of all orders completed as scheduled in July  
12 and August. The statistical test shows that the measurement does not meet  
13 the fixed critical value when compared with the retail analogue, but  
14 BellSouth's actual performance for both CLECs and its own retail operations  
15 is at a very high level – in this case over 99%. From a practical point of view,  
16 the CLECs' ability to compete has not been hindered even though the  
17 statistical results may technically show that BellSouth failed to meet the  
18 benchmark/analogue. BellSouth met the retail analogue comparison for this  
19 sub-metric in September 2001.

20

21 Average Completion Notice Interval / LNP (Standalone) / < 10 Circuits / Non-  
22 Dispatch (B.2.21.17.1.2) (July/August/September)

1 The root cause analysis of this measure 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 Disconnect Timeliness / LNP / < 10 Circuits (B.2.31.1)

20 The Disconnect Timeliness measure is supposed to track the time it takes to  
21 disconnect a number in the central office switch after the message has been  
22 received from the Local Number Portability (LNP) Gateway that it is ready.

1        However, this measurement does not track the relevant time to perform this  
2        function.

3

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

12

13       As it currently exists, Performance Measure P-13 does not recognize the  
14       importance of triggers and their effect on the LNP process. Rather, the  
15       current measure calculates the end time of the LNP activity as the processing  
16       of the actual disconnect order in the host switch, even though, from a  
17       customer’s perspective, this activity is totally meaningless on most LNP  
18       orders. It is the activation of the LNP and the routing function accomplished  
19       by the LSMS that ultimately determines whether the end user is back in full  
20       service and is able to make and receive calls when a trigger is used in porting  
21       a telephone number. So, while BellSouth may be missing this measure, the  
22       actual impact on CLECs and their end users, for a great majority of the orders  
23       is minimal, or nonexistent. The Georgia PSC is currently evaluating a change

1 in this measure that more accurately reflects the LNP process and its impacts  
2 on end users, and, therefore, the measurements will be shown blank until a  
3 resolution is reached on this issue.

4

5 **K. CHECKLIST ITEM 14 – RESALE**

6

7 BellSouth met or exceeded the benchmarks or retail analogues for 94% of the  
8 Resale sub-metrics having CLP activity in September 2001. In July and  
9 August 2001, BellSouth met or exceeded the benchmarks/analogues for 89%  
10 and 90%, respectively, of the resale sub-metrics. The details for the  
11 September data are delineated in Attachment 1D, Items A.1.1.1.1 through  
12 A.4.2.

13

14 During the three-month period from July through September 2001, there were  
15 126 Resale sub-metrics that had data for all three months and were  
16 compared to benchmarks or retail analogues. Of those 126 sub-metrics, 118  
17 (94%) sub-metrics met the relevant criteria in at least two of the three months.

18

19 **1. Resale Ordering Measures**

20 **FOC Timeliness**

21 In July 2001, 7,879 FOCs were returned for Resale LSRs, with 98% meeting  
22 the relevant benchmark. Of the 6,791 FOCs returned for electronically  
23 submitted LSRs in July, 99% were returned within the 3-hour benchmark

1 interval. In August 2001, BellSouth returned FOCs for 8,753 Resale LSRs  
2 and met the relevant benchmark on 99% of all FOCs. Of the 8,753 LSRs,  
3 7,405 were fully mechanized with 99% meeting the 3-hour benchmark. In  
4 September 2001, BellSouth returned FOCs for 6,912 Resale LSRs and met  
5 the relevant benchmark on 99% of them. Of the 6,912 LSRs, 5,906 were fully  
6 mechanized with 99.7% meeting the 3-hour benchmark. See Attachment 1D,  
7 Sections A.1.9 through A.1.13 for further details.

8

9 **Reject Interval**

10 In July 2001, 1,343 LSRs were rejected, with 98% returned within the relevant  
11 benchmark period. Of the LSRs rejected in July, 64% were submitted  
12 electronically with 98% returned within the 1-hour benchmark. In August  
13 2001, 1,576 LSRs were rejected, with 96% returned within the relevant  
14 benchmark period. Of the LSRs rejected in August, 58% were submitted  
15 electronically with 96% returned within the 1-hour benchmark. In September  
16 2001, 1,086 LSRs were rejected, with 96% returned within the relevant  
17 benchmark period. Of the LSRs rejected in September, 54% were submitted  
18 electronically with 96% returned within the 1-hour benchmark. See  
19 Attachment 1D, Items A.1.4 through A.1.8 for further details.

20

21 The Ordering sub-metrics for which BellSouth did not meet the  
22 benchmarks/analogues for July, August and/or September 2001 were:

23

1 Reject Interval / Residence / Electronic (A.1.4.1) (August/September)

2 Reject Interval / Business / Electronic (A.1.4.2) (August)

3 The current benchmark for these two sub-metrics is  $\geq 97\%$  within one hour.  
4 With the implementation of May data BellSouth was directed to change the  
5 time stamp identification for the start and complete times of the interval for  
6 this measurement from the Local Exchange Ordering (LEO) System to the  
7 CLEC ordering interface system (TAG or EDI). With this change BellSouth  
8 was unable to identify multiple issues of the same version of the LSRs that  
9 may be rejected (fatal rejects), which should be excluded from the  
10 measurement. If there are multiple issues of the same version, the measure  
11 currently calculates the interval from the initial issue to the final issue of the  
12 LSR returned to the CLEC, Reject or FOC. Consequently, BellSouth's  
13 performance level is inappropriately understated. BellSouth is currently  
14 working to determine a fix for this issue.

15  
16 BellSouth is conducting a detailed root cause analysis of the process for  
17 electronic rejects. This analysis addresses the ordering systems (EDI, TAG,  
18 and LENS) used by the CLECs and the back-end legacy applications, such  
19 as SOCS, that are accessed by the ordering systems.

20  
21 Thus far, the analysis has determined that many of the LSRs that did not  
22 meet the one-hour benchmark were issued between 11:00 p.m. and 4:30 a.m.  
23 Between these hours the system is unable to process LSRs because of the

1 back-end legacy systems are out of service. Such hours should be excluded  
2 from the measurement. BellSouth is currently reviewing the scheduled down  
3 time for all systems and how that down time affects the ordering capability of  
4 the CLECs. BellSouth met the benchmark comparison for both of these sub-  
5 metrics in July and met the Business sub-metric in September 2001.

6

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

8 There were only 3 orders associated with this sub-metric in July 2001. Such  
9 a small universe does not provide a statistically conclusive benchmark  
10 comparison. BellSouth met the benchmark comparison for this sub-metric in  
11 August and September 2001.

12

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

14 There were only 4 orders associated with this sub-metric in July 2001. Such  
15 a small universe does not provide a statistically conclusive benchmark  
16 comparison. BellSouth met the benchmark comparison for this sub-metric in  
17 August and September 2001.

18

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

20 There were only 6 orders associated with this sub-metric in July 2001. Such  
21 a small universe does not provide a statistically conclusive benchmark  
22 comparison. BellSouth met the benchmark comparison for this sub-metric in  
23 August and September 2001.

1

2 FOC Timeliness / ISDN / Manual (A.1.13.6) (July)

3 There were only 4 orders in this sub-metric for July 2001 with BellSouth  
4 meeting the benchmark for three of them. Such a small universe does not  
5 produce a statistically conclusive benchmark comparison. BellSouth met or  
6 exceeded the benchmark for this sub-metric in August and September 2001.

7

8 FOC & Reject Response Completeness and FOC & Reject Response

9 Completeness (Multiple Responses)

10 BellSouth has determined that the coding for the FOC & Reject  
11 Completeness and FOC & Reject Response Completeness (Multiple  
12 Responses) measures failed to include rejections that were classified as “auto  
13 clarifications.” BellSouth is in the process of rewriting the code to correct this  
14 problem, and the change will impact all FOC & Reject Completeness and  
15 FOC & Reject Response Completeness (Multiple Responses) measures.  
16 Effective with this Exhibit update for September data, the program coding has  
17 been corrected for all the FOC & Reject Completeness sub-metrics for  
18 Checklist Item No. 14, Resale products. The individual sub-metrics with  
19 corrected coding and that missed the required benchmarks in September  
20 2001 will be addressed separately following the next section. BellSouth did  
21 not meet the benchmark in July and/or August 2001 for the FOC and Reject  
22 Response Completeness or in July, August and/or September 2001, for the



1 FOC & Reject Response Completeness (Multiple Responses) metrics listed  
2 below:

3

4 FOC Reject & Response Completeness / Residence / Electronic (A.1.14.1)  
5 (July)

6 FOC Reject & Response Completeness / Business / Electronic (A.1.14.2)  
7 (July)

8 FOC Reject & Response Completeness / Business / Manual (A.1.16.2) (July)

9 FOC Reject & Response Completeness / Business / Manual (A.1.16.3)  
10 (August)

11 FOC Reject & Response Completeness / PBX / Manual (A.1.16.4) (July)

12 FOC Reject & Response Completeness / Centrex / Manual (A.1.16.5) (July)

13 FOC Reject & Response Completeness / ISDN / Manual (A.1.16.6)  
14 (July/August)

15 FOC Reject & Response Completeness (Multiple Responses) / Residence /  
16 Partially Electronic (A.1.18.1) (July/August/September)

17 FOC Reject & Response Completeness (Multiple Responses) / Business /  
18 Partially Electronic (A.1.18.2) (July/August/September)

19 FOC Reject & Response Completeness (Multiple Responses) / Design  
20 (Specials) / Partially Electronic (A.1.18.3) (September)

21 FOC Reject & Response Completeness (Multiple Responses) / PBX /  
22 Partially Electronic (A.1.18.4) (September)

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

2 Manual (A.1.19.1) (July/August/September)

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

4 Manual (A.1.19.2) (September)

5 FOC Reject & Response Completeness (Multiple Responses) / Design /

6 Manual (A.1.19.3) (September)

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

8 Manual (A.1.19.5) (July)

9 BellSouth has determined that the coding for the FOC & Reject  
10 Completeness and FOC & Reject Response Completeness (Multiple  
11 Responses) measures failed to include rejections that were classified as “auto  
12 clarifications.” BellSouth is in the process of rewriting the code to correct this  
13 problem, and the change will impact all FOC & Reject Completeness and  
14 FOC & Reject Response Completeness (Multiple Responses) measures.

15

16 The following FOC & Reject Response Completeness sub-metrics, for which  
17 the program code has been corrected, did not meet the benchmarks for  
18 September:

19

20 FOC Reject & Response Completeness / Business / Partial Electronic  
21 (A.1.15.2) (September)

22 BellSouth met the benchmark standard for 181 of the 192 (94.27%)  
23 responses for this sub-metric in September 2001. This result was only two

1 responses short of meeting the benchmark for the sub-metric for the month.  
2 BellSouth continues to focus on this measurement in order to improve results  
3 to meet the benchmark.

4

5 FOC Reject & Response Completeness / PBX / Manual (A.1.16.4)  
6 (September)

7 BellSouth met the benchmark standard for 8 of the 11 responses for this sub-  
8 metric in September 2001. With a universe size of only 11 orders and a 95%  
9 benchmark, a problem with only one order causes a miss for the entire sub-  
10 metric. BellSouth continues to focus on this measurement in order to improve  
11 results to meet the benchmark.

12

13 FOC Reject & Response Completeness / ISDN / Manual (A.1.16.6)  
14 (September)

15 BellSouth met the benchmark standard for 9 of the 10 responses for this sub-  
16 metric in September 2001. With a universe size of only 10 orders and a 95%  
17 benchmark, a problem with only one order causes a miss for the entire sub-  
18 metric. BellSouth continues to focus on this measurement in order to improve  
19 results to meet the benchmark.

20

## 21 **2. Resale Provisioning Measures**

22 BellSouth met or exceeded the benchmark or retail analogue for 91% of all  
23 Resale provisioning measures in July, 93% in August, and 98% in September

1 2001. The details supporting the September percentage are delineated in  
2 Items A.2.1.1.1 through A.2.20.6.2.2 of Attachment 1D.

3

4 Resale provisioning sub-metrics for which BellSouth did not meet the  
5 benchmark/retail analogue in July, August and/or September 2001 were:

6

7 % Jeopardies / Residence (A.2.4.1) (August)

8 There were 38 orders placed in jeopardy status of the 5,185 orders completed  
9 for this sub-metric in August 2001. Fourteen of these jeopardies were  
10 resolved prior to the due dates and the orders worked as scheduled. None of  
11 the jeopardies in this sub-metric resulted in held orders in August 2001.  
12 BellSouth met the retail analogue comparison for this sub-metric in July and  
13 September 2001.

14

15 % Jeopardy Notice >= 48 hours / Residence / Mechanized (A.2.9.1) (August)

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

20

21 % Missed Installation Appointments / Business / < 10 Circuits / Dispatch  
22 (A.2.11.2.1.1) (July)

1 BellSouth met 59 of the 63 installation appointments as scheduled for this  
2 sub-metric in July 2001. The four missed appointments in this sub-metric did  
3 not reveal any distinct patterns or systemic installation issues. BellSouth met  
4 the retail analogue comparison for this sub-metric in August and September  
5 2001.

6

7 % Provisioning Troubles w/i 30 days / Residence / < 10 Circuits / Non-  
8 Dispatch (A.2.12.1.1.2) (July/August/September)

9 For the period July through September 2001, less than 5% of the orders  
10 completed for this sub-metric in the prior 30 days had trouble reports in the  
11 following month. In August, 58 of the trouble reports (27%) were closed as  
12 "TOK/FOK." Excluding these reports, BellSouth would have met the retail  
13 analogue comparison for August. In September, over 22% of the trouble  
14 reports for this sub-metric were closed as "TOK/FOK." Analysis of the  
15 troubles for the sub-metric revealed that a majority were related to cable and  
16 drop facilities distributed throughout the state with no distinct pattern or trend.

17

18 % Provisioning Troubles w/i 30 days / Residence / >= 10 Circuits / Dispatch  
19 (A.2.12.1.2.1) (July)

20 There was only one order completed for this sub-metric in the 30 days prior to  
21 July 2001. the small universe of orders for this sub-metric does not provide a  
22 statistically conclusive comparison to the retail analogue. There was no  
23 CLEC activity for this sub-metric in either August or September 2001.

1

2 % Provisioning Troubles w/i 30 days / Business / < 10 Circuits / Dispatch

3 (A.2.12.2.1.1) (July)

4 In July 2001, there were a total of 7 troubles reported for the 80 orders that  
5 completed in the prior 30 days. There was no systemic pattern to the troubles  
6 reported in July. BellSouth met the retail analogue comparison for this sub-  
7 metric in August and September 2001.

8

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

10 (A.2.25.1.1.2) (July/August)

11 BellSouth met the standard for 70 of the 97 orders reviewed in this sub-metric  
12 for July and 295 of the 329 orders reviewed in August 2001. The 95%  
13 benchmark set a requirement of 92 orders in July and 313 orders in August  
14 based on the quantity of orders for this sub-metric. BellSouth continues to  
15 focus on this measurement in order to improve results to meet the  
16 benchmark. BellSouth met the benchmark for this sub-metric in September  
17 2001.

18

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

20 (A.2.25.2.1.2) (July)

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

1 measurement in order to improve results to meet the benchmark. BellSouth  
2 met or exceeded the benchmark for this sub-metric in August and September  
3 2001.

4

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

6 (August)

7 BellSouth met the standard for 7 of the 8 orders reviewed in this sub-metric  
8 for August 2001. The small universe for this measurement does not provide a  
9 statistically conclusive comparison to the retail analogue. BellSouth met the  
10 retail analogue comparison for this sub-metric in July 2001. There was no  
11 CLEC activity for this sub-metric in September 2001.

12

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

14

15 BellSouth met the relevant retail analogue comparisons for 89% of all the  
16 Resale Maintenance & Repair measurements in July, 87% in August and  
17 94% in September 2001. The sub-metrics for which BellSouth did not meet  
18 the retail analogues in July, August and/or September 2001 were:

19

20 % Missed Repair Appointments / Design (Specials) / Dispatch (A.3.1.3.1)

21 (July)

22 BellSouth missed one of four repair appointments scheduled for July 2001.

23 Such a small universe does not provide a statistically conclusive comparison

1 to the retail analogue. BellSouth met or exceeded the retail analogue for this  
2 sub-metric in August and September 2001.

3

4 Customer Trouble Report Rate / Residence / Dispatch (A.3.2.1.1)  
5 (August/September)

6 In August 2001, the CLECs had over 96% trouble free service for the 19,173  
7 lines in service in this sub-metric. In September 2001, the CLECs had over  
8 97% trouble free service for the 19,557 lines in service. The trouble report  
9 rate for CLECs for this sub-metric was approximately 0.4% higher than for the  
10 retail analogue for both August and September. Eighty-three of the August  
11 trouble reports were closed as "TOK/FOK." In September, eighty of the  
12 trouble reports were closed as "TOK/FOK." Excluding these reports, the  
13 CLEC trouble report rate would have been the same as, or less than for  
14 BellSouth retail. BellSouth met the retail analogue comparison for this sub-  
15 metric in July 2001.

16

17 Customer Trouble Report Rate / PBX / Dispatch (A.3.2.4.1)  
18 (July/August/September)

19 There were 10 trouble reports out of 728 lines in service for this sub-metric in  
20 July, 1 trouble report for the 667 lines in service in August and 4 trouble  
21 reports for the 614 lines in service in September 2001. In September, the 4  
22 troubles involved only 2 lines. Both the follow-up trouble reports were closed  
23 as "no trouble found." BellSouth provided 98% or 99% trouble free service for



1 the in-service lines in this sub-metric for both CLECs and BellSouth retail  
2 customers in all three months. When BellSouth provisions high quality  
3 service coupled with very large universe sizes, it can cause an apparent out  
4 of equity condition from a quantitative viewpoint. In these cases, there is  
5 very little variation and the universe size is so large that the Z-test becomes  
6 overly sensitive to any difference. In other words, the statistical test shows  
7 that the measurement does not meet the fixed critical value when compared  
8 with the retail analogue, but BellSouth's actual performance for both CLECs  
9 and its own retail operations is at a very high level – often 98% or 99%. From  
10 a practical point of view, the CLECs' ability to compete has not been hindered  
11 even though the statistical results may technically show that BellSouth failed  
12 to meet the benchmark/analogue.

13  
14 Customer Trouble Report Rate / PBX / Non-Dispatch (A.3.2.4.2) (July)

15 There were only 2 trouble reports for the 728 in service lines for this sub-  
16 metric in July 2001. BellSouth provided over 99.5% trouble free service for  
17 both retail and the CLECs for this sub-metric for the month of July. From a  
18 practical point of view, the CLECs' ability to compete has not been hindered  
19 even though the statistical results may technically show that BellSouth failed  
20 to meet the benchmark/analogue. BellSouth met or exceeded the retail  
21 analogue comparison for this sub-metric in August and September 2001.

22

1 Customer Trouble Report Rate / Centrex / Dispatch (A.3.2.5.1)

2 (August/September)

3 There were 5 trouble reports for the 597 lines in service for this sub-metric in  
4 August and 13 trouble reports for the 582 lines in service in September 2001.

5 In September, of the 13 troubles reported, 10 were at the same customer  
6 location, and all were repaired in less than one hour. BellSouth provided 99%  
7 and 97% trouble free service for both retail and the CLECs for this sub-metric  
8 for the months of August and September, respectively. From a practical point  
9 of view, the CLECs' ability to compete has not been hindered even though the  
10 statistical results may technically show that BellSouth failed to meet the  
11 benchmark/analogue. BellSouth met the retail analogue comparison for this  
12 sub-metric in July 2001.

13

14 Maintenance Average Duration / PBX / Dispatch (A.3.3.4.1) (August)

15 There was only one trouble report for this sub-metric in August 2001. The  
16 small universe for this measurement does not provide a statistically  
17 conclusive comparison with the retail analogue. BellSouth met the retail  
18 analogue comparison for this sub-metric in July and September 2001.

19

20 Maintenance Average Duration / PBX / Non-Dispatch (A.3.3.4.2) (August)

21 There was only one trouble report for this sub-metric in August 2001. The  
22 small universe for this measurement does not provide a statistically

1 conclusive comparison with the retail analogue. BellSouth met the retail  
2 analogue comparison for this sub-metric in July and September 2001.

3

4 % Repeat Troubles within 30 days / PBX / Dispatch (A.3.4.4.1) (September)

5 There were only four trouble reports for this sub-metric in September 2001.

6 The small universe for this measurement does not provide a statistically  
7 conclusive comparison with the retail analogue. BellSouth met or exceeded  
8 the retail analogue for this sub-metric in July and August 2001.

9

10 % Repeat Troubles within 30 days / PBX / Non Dispatch (A.3.4.4.2) (July)

11 There were only two trouble reports for this sub-metric in July 2001. The  
12 small universe for this measurement does not provide a statistically  
13 conclusive comparison with the retail analogue. BellSouth met the retail  
14 analogue comparison for this sub-metric in August and September 2001.

15

16 % Repeat Troubles within 30 days / ISDN / Dispatch (A.3.4.6.1) (July)

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

21

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

1 There was one trouble report in this sub-metric that resulted in an out-of-  
2 service condition for more than 24 hours in July 2001. Such a small universe  
3 for this sub-metric does not provide a statistically conclusive benchmark  
4 comparison. BellSouth met the retail analogue comparison for this sub-metric  
5 in August and September 2001.

6

7 Out of Service > 24 Hours / PBX / Dispatch (A.3.5.4.1) (August)

8 There was one trouble report in this sub-metric that resulted in an out-of-  
9 service condition for more than 24 hours in August 2001. Such a small  
10 universe for this sub-metric does not provide a statistically conclusive  
11 comparison to the retail analogue. BellSouth met the retail analogue  
12 comparison for this sub-metric in July and September 2001.

13

14 Out of Service > 24 Hours / PBX / Non-Dispatch (A.3.5.4.2) (August)

15 There was one trouble report in this sub-metric that resulted in an out-of-  
16 service condition for more than 24 hours in August 2001. Such a small  
17 universe for this sub-metric does not provide a statistically conclusive  
18 comparison to the retail analogue. BellSouth met the retail analogue  
19 comparison for this sub-metric in July and September 2001.

20

21

**III. Summary**

22

1 As stated in the Introduction to the Analysis of Performance Measurements  
2 section, BellSouth met or exceeded the benchmarks/retail analogues for 519  
3 of the 574 sub-metrics (90%) for which there was CLEC activity in September  
4 2001. In August 2001, 437 of 509 sub-metrics (86%) met or exceeded the  
5 benchmarks or retail analogues. BellSouth met or exceeded the criteria for  
6 424 of the 488 sub-metrics (87%) for which there was CLEC activity in July  
7 2001.

8

9 During the three-month period, July through September 2001, excluding the  
10 measures with calculation problems, there were a total of 437 sub-metrics  
11 that had CLEC activity for all three months and that were compared with  
12 either benchmarks or retail analogues. Of these 437 sub-metrics, 388 sub-  
13 metrics (89%) satisfied the comparison criteria during at least two of the three  
14 months.

15