DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

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DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

I. INTRODUCTION

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

II. ANALYSIS OF PERFORMANCE MEASUREMENTS

A. Introduction

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

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

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

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

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

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

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

B. CHECKLIST ITEM 1 – INTERCONNECTION

1. Collocation

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

2. Local Interconnection Trunking

Trunking Reports

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

In July, August and September 2001, BellSouth met the benchmarks/retail analogue comparisons for 14 of the 14, 15 of the 18 and 22 of the 22, respectively, local interconnection trunking sub-metrics having CLEC activity. The sub-metrics that did not meet the retail analogue comparison in August 2001 are as follows:

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

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

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

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

Customer Trouble Report Rate / Local Interconnection Trunks / Non-Dispatch (C.3.2.2) (August)

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

Trunk Blockage

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

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

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

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

Product	Checklist Item:
Combo (Loop & Port)	#2 – Unbundled Network Elements
Combo (Other)	#2 – Unbundled Network Elements
Other Design	#2 – Unbundled Network Elements
Other Non-Design	#2 – Unbundled Network Elements
xDSL Loop	#4 – Unbundled Local Loops
UNE ISDN Loop	#4 – Unbundled Local Loops
Line Sharing	#4 – Unbundled Local Loops
2w Analog Loop Design	#4 – Unbundled Local Loops
2w Analog Loop Non Design	#4 – Unbundled Local Loops
2w Analog Loop w/INP Design	#4 – Unbundled Local Loops
2w Analog Loop w/INP Non Design	#4 – Unbundled Local Loops
2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops
Digital Loop < DS1	#4 – Unbundled Local Loops
Digital Loop => DS1	#4 – Unbundled Local Loops
Local Interoffice Transport	#5 – Unbundled Local Transport
Switch Ports	#6 – Unbundled Local Switching
INP Standalone	#11 – Local Number Portability
LNP Standalone	#11 – Local Number Portability

An overall review of the UNE sub-metrics for Ordering, Provisioning, Maintenance & Repair and Billing indicates that BellSouth met the

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

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

1. UNE Ordering Measures

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

Reject Interval

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

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

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

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

<u>Reject Interval / Combo (Loop & Port) / Electronic (B.1.4.3) (July/August/September)</u>

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

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

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

<u>Reject Interval / xDSL / Electronic (B.1.4.5) (July)</u>

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

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

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

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

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

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

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

Reject Interval / 2w Analog Loop w/LNP Design / Partially Mechanized (B.1.7.12) (September)

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

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

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

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

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

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

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

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

FOC Timeliness

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

FOC & Reject Response Completeness / xDSL / Electronic (B.1.14.5) (August/September)

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

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

FOC & Reject Response Completeness / xDSL / Partial Electronic (B.1.15.5) (July/August/September)

FOC & Reject Response Completeness / Local Interoffice Transport / Manual (B.1.16.2) (August)

FOC & Reject Response Completeness / xDSL / Manual (B.1.16.5) (August)

FOC & Reject Response Completeness / Line Sharing / Manual (B.1.16.7) (August)

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

FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop & Port) / Electronic (B.1.17.3) (August/September)

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

FOC & Reject Response Completeness (Multiple Responses) / Other Design / Electronic (B.1.17.14) (September)

FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop & Port) / Partial Electronic (B.1.18.3) (August/September)

FOC & Reject Response Completeness (Multiple Responses) / Line Sharing / Partial Electronic (B.1.18.7) (August)

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

FOC & Reject Response Completeness (Multiple Responses) / Other Design / Partial Electronic (B.1.18.14) (July/August/September)

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

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

FOC & Reject Response Completeness (Multiple Responses) / UNE ISDN / Manual (B.1.19.6) (September)

FOC & Reject Response Completeness (Multiple Responses) / Line Sharing / Manual (B.1.19.7) (September)

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

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

FOC & Reject Response Completeness (Multiple Responses) / Other Design / Manual (B.1.19.14) (September)

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

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

<u>FOC & Reject Response Completeness / Other Design / Electronic (B.1.14.14) (September)</u>

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

<u>FOC & Reject Response Completeness / Line Sharing / Manual (B.1.16.7) (September)</u>

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

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

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

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

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

Flow-Through

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

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

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

Customer Type	July 2001	August 2001	September 2001	Benchmark
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.

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

BellSouth has established a Flow-Through Improvement Program Management process that includes seven different internal organizations. Ongoing analysis is being done to determine trends and identify flow-through

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

2. UNE Provisioning Measures

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

Order Completion Interval / Combo (Loop & Port) / < 10 Circuits / SBO (B.2.1.3.1.3) (August)

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

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

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

% Jeopardy Notice Interval >= 48 hours / Combo (Loop & Port) / < 10 Circuits (B.2.10.3) (July/August)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Customer Trouble Report Rate / Other Non-Design / Non-Dispatch (B.3.2.11.2) (September)

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

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

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

4. Other UNE Measures

Pre-Ordering

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

Operations Support Systems

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

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

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

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

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

Average Response Interval – CLEC (TAG) / HAL / CRIS / Region / ROS (D.1.4.7.2) (July)

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

Average Response Interval / CRIS / Region (D.2.4.1.1) (July/August/September)

The average response interval for this sub-metric is measured in three separate disaggregations -- the percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. The average response interval for the CLEC requests did not meet the retail analogue intervals for the less than 4-second disaggregation but exceeded both the less than 10 and greater than 10 seconds responses. For the 4-second interval, there was only approximately 1% difference between the CLEC responses as compared with the retail analogue in all three months. Both the CLECs and the retail analogue received approximately 99% within the less than 10 second response interval. Similarly, for the greater than 10 seconds interval measure, the CLECs and the BellSouth retail analogue received approximately 1% of responses in over 10 seconds. These very small differences in response intervals indicate equivalent service levels for the CLECs and BellSouth retail.

Average Response Interval / LMOS / Region (D.2.4.4.1, D.2.4.4.2, D.2.4.4.3) (July/August/September)

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

Average Response Interval / LMOSupd / Region (D.2.4.5.1, D.2.4.5.2, D.2.4.5.3) (July/August/September)

The average response interval for this sub-metric is measured in three separate disaggregations. The percentage of queries that are responded to in less than 4 seconds, less than 10 seconds and greater than 10 seconds. For each of the three sub-metrics, there was less than a 3% difference in the responses received by the CLECs and BellSouth retail in each month. Differences of less than 3% for all of these intervals indicate virtually equivalent service levels for both the CLECs and BellSouth retail.

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

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

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

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

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

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

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

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

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

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

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

General – Billing

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

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

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

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

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

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

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

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

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

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

Non-Recurring Charge Completeness / Interconnection (F.9.6.3) (July/August/September)

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

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

General - Change Management

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

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

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

General – New Business Requests

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

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

General – Ordering

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

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

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

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

% Acknowledgement Message Completeness / TAG (F.12.2.2) (July/August/September)

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

D. CHECKLIST ITEM 4 – UNBUNDLED LOCAL LOOPS

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

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

xDSL Group

1. Provisioning Measures

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

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

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

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

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

2. Maintenance & Repair Measures

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

There were only four orders associated with this sub-metric in July 2001. Such a small universe for this sub-metric does not provide a statistically

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SL1/SL2/Digital Loop Group

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

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

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

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

There were only 9 orders associated with this sub-metric in August and 11 orders in September 2001. Even though six of the nine orders for August and six of the eleven orders for September were shown in jeopardy status, all but one of the August jeopardies and all but one of the September orders were resolved prior to the due dates and the orders were worked as scheduled. The small universe size for this sub-metric does not provide a statistically

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

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

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

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

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

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

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

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

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

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

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

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

E. CHECKLIST ITEM 5 – UNBUNDLED LOCAL TRANSPORT

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

F. CHECKLIST ITEM 6 – UNBUNDLED LOCAL SWITCHING

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

G. CHECKLIST ITEM 7a – 911 AND E911 SERVICES

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

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

I. CHECKLIST ITEM 10 – ACCESS TO DATABASES AND ASSOCIATED SIGNALING

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

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

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

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

% NXXs / LRNs Loaded by LERG Effective Date (Region) (F.13.3) (July/August/September)

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

J. CHECKLIST ITEM 11 – NUMBER PORTABILITY

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

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

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

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

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

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

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

<u>Disconnect Timeliness / LNP / < 10 Circuits (B.2.31.1)</u>

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

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

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

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

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

K. CHECKLIST ITEM 14 – RESALE

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

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

1. Resale Ordering Measures

FOC Timeliness

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

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

Reject Interval

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

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

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

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

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

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

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

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

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

There were only 3 orders associated with this sub-metric in July 2001. Such a small universe does not provide a statistically conclusive benchmark comparison. BellSouth met the benchmark comparison for this sub-metric in August and September2001.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

FOC Reject & Response Completeness (Multiple Responses) / Residence / Manual (A.1.19.1) (July/August/September)

FOC Reject & Response Completeness (Multiple Responses) / Business / Manual (A.1.19.2) (September)

FOC Reject & Response Completeness (Multiple Responses) / Design / Manual (A.1.19.3) (September)

FOC Reject & Response Completeness (Multiple Responses) / Centrex / Manual (A.1.19.5) (July)

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

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

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

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

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

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

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

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

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

2. Resale Provisioning Measures

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Service Order Accuracy / Residence / < 10 Circuits / Non Dispatch (A.2.25.1.1.2) (July/August)

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

Service Order Accuracy / Business / < 10 Circuits / Non-Dispatch (A.2.25.2.1.2) (July)

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

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

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

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

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

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

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

BellSouth missed one of four repair appointments scheduled for July 2001. Such a small universe does not provide a statistically conclusive comparison

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

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

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

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

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

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

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

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

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

There were 5 trouble reports for the 597 lines in service for this sub-metric in August and 13 trouble reports for the 582 lines in service in September 2001. In September, of the 13 troubles reported, 10 were at the same customer location, and all were repaired in less than one hour. BellSouth provided 99% and 97% trouble free service for both retail and the CLECs for this sub-metric for the months of August and September, respectively. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may technically show that BellSouth failed to meet the benchmark/analogue. BellSouth met the retail analogue comparison for this sub-metric in July 2001.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

III. Summary

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

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