

DISCUSSION OF PERFORMANCE MEASUREMENTS DATA

TABLE OF CONTENTS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

I. Introduction	2
II. Analysis of Performance Measurements	2
A. Introduction	2
B. Checklist Item 1 – Interconnection	4
C. Checklist Item 2 – Unbundled Network Elements	7
D. Checklist Item 4 – Unbundled Local Loops	43
E. Checklist Item 5 – Unbundled Local Transport	49
F. Checklist Item 6 – Unbundled Local Switching	49
G. Checklist Item 7a – 911 and E911 Services	50
H. Checklist Item 7b – Directory Assistance/Operator Services	50
I. Checklist Item 10 - Access To Database & Associated Signaling	50
J. Checklist Item 11 – Number Portability	51
K. Checklist Item 14 – Resale	54
III. Summary	75
Attachments:	
1E October 2001 Kentucky Summary Results	
2E October 2001 Flow-Through Report	
3E October 2001 Trunk Group Performance Report	

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

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

14
15 **A. Introduction**

16
17 Attachment 1E is the Monthly State Summary (MSS) for Kentucky for October
18 2001. The October MSS contains 2,338 sub-metrics. The increase in sub-
19 metrics in October as compared to August and September is due to the
20 implementation of additional disaggregations to the FOC and Reject
21 Response Completeness measures to distinguish between LSRs submitted
22 through the EDI and TAG systems. In October 2001, BellSouth met or
23 exceeded the comparison criteria for 577 of the 661 sub-metrics, or 87%, that

1 had CLEC activity and were compared to benchmarks or retail analogues. In
2 September 2001, BellSouth met or exceeded the benchmark / retail analogue
3 for 519 of the 574 sub-metrics, or 90% that had CLEC activity, and in August
4 2001, BellSouth met or exceeded the benchmark or retail analogue for 440 of
5 the 513 sub-metrics, or 86%, that had CLEC activity.

6

7 As explained in previous updates to this Exhibit, three of the measures were
8 identified by BellSouth as having deficiencies in their calculations and were
9 investigated and evaluated for appropriate program code corrections. These
10 three measures were Average Jeopardy Notice Interval, FOC & Reject
11 Completeness (including the "Multiple Responses" sub-metrics), and LNP
12 Disconnect Timeliness. Program coding modifications have been completed
13 for the FOC and Reject Completeness measures, and the equity indications
14 are now included in the sub-metric counts for October. The Average
15 Jeopardy Notice Interval measurement is still undergoing program
16 modifications, and the LNP Disconnect Timeliness measure is still being
17 evaluated for significant design modifications. Even though these measures
18 are included in the MSS and in the total number of measurements calculation
19 (2,338), the results for these two measures were excluded from the
20 "Met/Total" (577/661) percentage calculations. As the program coding
21 corrections are completed, the additional sub-metrics affected by the changes
22 will be included in the Exhibit updates.

23

1 During the three-month period, August through October 2001, again adjusting
2 for the two measures mentioned above, there were a total of 464 sub-metrics
3 that had CLEC activity for all three months and that were compared with
4 either benchmarks or retail analogues. Of these 464 sub-metrics, 416 sub-
5 metrics (90%) satisfied the comparison criteria in at least two of the three
6 months.

7

8 Each sub-metric designated as having not satisfied the benchmark or
9 BellSouth retail analogue requirement for August, September and/or October
10 2001 is included in this Exhibit. Each sub-metric discussed is labeled as to
11 what month(s) the missed criteria occurred (August/September/October).

12

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

15

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

17

18 **1. Collocation**

19 BellSouth provides three separate collocation reports: 1) Average Response
20 Time; 2) Average Arrangement Time; and 3) Percent of Due Dates Missed.
21 Section E in Attachment 1E, Items E.1.1.1 through E.1.3.3, provides these
22 results. BellSouth met the approved benchmarks for all of the sub-metrics
23 with CLEC activity in August, September and October 2001.

1

2 **2. Local Interconnection Trunking**

3 Trunking Reports

4 Attachment 1E, Section C, Items C.1.1 to C.4.2 of the October MSS contains
5 data for ordering, provisioning, maintenance and repair, and billing associated
6 with Local Interconnection Trunks.

7

8 In August, September and October 2001, BellSouth met the
9 benchmarks/retail analogue comparisons for 15 of the 18, 22 of the 22 and 23
10 of the 23, respectively, local interconnection trunking sub-metrics having
11 CLEC activity. The sub-metrics that did not meet the retail analogue
12 comparison in August 2001 are as follows:

13

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

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

20

21 Service Order Accuracy / Local Interconnection Trunks / >= 10 Circuits /

22 Dispatch (C.2.11.2.1) (August)

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

5

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

8 There were 25 troubles reported in August 2001 for the 11,166 lines in
9 service for this sub-metric. Both the CLECs and BellSouth retail received
10 greater than 99.7% trouble free service for this sub-metric in August. When
11 BellSouth provisions high quality service coupled with very large universe
12 sizes, it can cause an apparent out of equity condition from a quantitative
13 viewpoint. In these cases, there is very little variation and the universe size
14 is so large that the Z-test becomes overly sensitive to any difference. In other
15 words, the statistical test shows that the measurement does not meet the
16 fixed critical value when compared with the retail analogue, but BellSouth's
17 actual performance for both CLECs and its own retail operations is at a very
18 high level – in this case over 99%. From a practical point of view, the CLECs'
19 ability to compete has not been hindered even though the statistical results
20 may technically show that BellSouth failed to meet the benchmark/analogue.
21 BellSouth met the benchmark for this sub-metric in September 2001. There
22 was no CLEC activity for this sub-metric in October 2001.

23

1 Trunk Blockage

2 BellSouth has developed a trunk blocking report that compares BellSouth
3 retail's trunk blockage rates to those of CLECs. The report, Trunk Group
4 Performance Report (TGP), Attachment 3E, displays trunk blocking in a
5 manner that accurately represents the customer experience. The TGP report
6 tabulates actual call blocking as a percentage of call attempts for all
7 comparable trunk groups administered by BellSouth that handle CLEC and
8 BellSouth traffic. The TGP report provides a direct comparison of hour-by-
9 hour blocking between CLEC and BellSouth trunk groups. Attachment 3E,
10 Item C.5.1 (TGP), shows the actual trunk blocking percentages by hour for
11 October 2001. The Analogue/Benchmark for the Trunk Group Performance
12 measure is any consecutive two-hour period in 24 hours where CLEC
13 blockage exceeds BellSouth blockage by more than 0.5%. BellSouth met or
14 exceeded the retail analogue for this sub-metric in August, September and
15 October 2001.

16

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

18

19 This section addresses the measures associated with UNEs under checklist
20 item 2. Attachment 1E, Sections B1 – B3, provides data that is divided into
21 Ordering, Provisioning and Maintenance & Repair operations. The Ordering
22 function is disaggregated into 17 sub-metrics. The Provisioning function has
23 19 sub-metrics, and there are 12 sub-metrics for the Maintenance & Repair

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

6	<u>Product</u>	<u>Checklist Item:</u>
7	Combo (Loop & Port)	#2 – Unbundled Network Elements
8	Combo (Other)	#2 – Unbundled Network Elements
9	Other Design	#2 – Unbundled Network Elements
10	Other Non-Design	#2 – Unbundled Network Elements
11	xDSL Loop	#4 – Unbundled Local Loops
12	UNE ISDN Loop	#4 – Unbundled Local Loops
13	Line Sharing	#4 – Unbundled Local Loops
14	2w Analog Loop Design	#4 – Unbundled Local Loops
15	2w Analog Loop Non Design	#4 – Unbundled Local Loops
16	2w Analog Loop w/INP Design	#4 – Unbundled Local Loops
17	2w Analog Loop w/INP Non Design	#4 – Unbundled Local Loops
18	2w Analog Loop w/LNP Design	#4 – Unbundled Local Loops
19	2w Analog Loop w/LNP Non Design	#4 – Unbundled Local Loops
20	Digital Loop < DS1	#4 – Unbundled Local Loops
21	Digital Loop => DS1	#4 – Unbundled Local Loops
22	Local Interoffice Transport	#5 – Unbundled Local Transport
23	Switch Ports	#6 – Unbundled Local Switching

1 INP Standalone #11 – Local Number Portability

2 LNP Standalone #11 – Local Number Portability

3

4 An overall review of the UNE sub-metrics for Ordering, Provisioning,
5 Maintenance & Repair and Billing indicates that BellSouth met the
6 benchmark/analogue for 90% of the sub-metrics during October, 91% of the
7 sub-metrics in September and 88% of the sub-metrics in August 2001.

8

9 During the three-month period from August through October 2001, there were
10 205 UNE sub-metrics that had data for all three months and were compared
11 to benchmarks or retail analogues. Of those 205 sub-metrics, 187 (91%) sub-
12 metrics met the relevant criteria in at least two of the three months.

13

14 **1. UNE Ordering Measures**

15

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

20

21 **Reject Interval**

22 Items B.1.4 - B.1.8 in Attachment 1E examine the Reject Interval for the
23 month of October 2001. For orders submitted electronically, the benchmark is

1 97% within one hour. In August and September 2001, 96% and 94%,
2 respectively, of the rejected service requests were delivered within the one-
3 hour time period. In October 2001, 89% of rejected UNE electronic LSRs
4 were returned within the one-hour benchmark.

5

6 For partially mechanized orders, the benchmark is 85% within 10 hours.
7 BellSouth exceeded the benchmark in August, September and October with
8 98%, 97% and 95%, respectively, of rejects for partially mechanized orders
9 returned within the 10-hour period.

10

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

15

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

18

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

21 BellSouth is conducting a detailed root cause analysis of the process for
22 electronic rejects. This analysis addresses the ordering systems (EDI, TAG,

1 and LENS) used by the CLECs and the back-end legacy applications, such
2 as SOCS, that are accessed by the ordering systems.

3

4 Thus far, the analysis has determined that many of the LSRs that did not
5 meet the one-hour benchmark in August and September were issued
6 between 11:00 p.m. and 4:30 a.m. Between these hours, the system is
7 unable to process LSRs because certain of the back-end legacy systems are
8 out of service. LSRs submitted during these periods should have been
9 excluded from the measurement. BellSouth implemented a program coding
10 change in September to exclude these LSRs from this measure.

11

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

23

1 Reject Interval / Line Sharing / Electronic (B.1.4.7) (October)

2 There were only six orders for this sub-metric in October 2001. Such a small
3 universe for this sub-metric does not provide a conclusive benchmark
4 comparison. There were no rejected LSRs for this sub-metric in September
5 2001. BellSouth met the benchmark for this sub-metric in August 2001.

6

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

8 (August/September/October)

9 There were only seven rejected LSRs for this sub-metric for August, two
10 rejected LSRs in September and ten rejected LSRs in October 2001. Such a
11 small universe for this sub-metric does not provide a conclusive benchmark
12 comparison.

13

14 Reject Interval / Other Design / Electronic (B.1.4.14)

15 (August/September/October)

16 There were only three rejected LSRs for this sub-metric in August, only eight
17 rejected LSRs in September and only nine rejected LSRs in October 2001.
18 Such a small universe for this sub-metric does not provide a conclusive
19 benchmark comparison.

20

21 Reject Interval / Other Non-Design / Electronic (B.1.4.15) (October)

22 BellSouth has been directed to change the time stamp identification for the
23 start and complete times of the interval for this measurement from the Local

1 Exchange Ordering (LEO) System to the CLEC ordering interface system
2 (TAG or EDI). However, with this change, BellSouth is currently unable to
3 identify multiple issues of the same version of LSRs that have been rejected
4 (fatal rejects). These rejected LSRs should be excluded from the
5 measurement. If there are multiple issues of the same version, the measure
6 currently calculates the interval from the initial issue to the final issue of the
7 LSR returned to the CLEC, Reject or FOC. Consequently, BellSouth's
8 performance level is inappropriately understated. BellSouth is currently
9 working to determine a fix for this issue. BellSouth met the benchmark for
10 this sub-metric in September 2001. There were no rejected CLEC LSRs for
11 this sub-metric in August 2001

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

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

18
19 Reject Interval / Line Sharing / Partially Mechanized (B.1.7.7) (October)

20 BellSouth met the 10-hour benchmark interval for 10 of the 12 rejected LSRs
21 for this sub-metric in October 2001. The 85% benchmark required that 11 of
22 the 12 orders be returned. There were no CLEC LSRs rejected for this sub-

1 metric in September. BellSouth met the benchmark for this sub-metric in
2 August 2001.

3

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

6 There were only three rejected LSRs for this sub-metric in September and
7 seven rejected LSRs in October 2001. Such a small universe for this sub-
8 metric does not provide a conclusive benchmark comparison. There was no
9 CLEC activity for this sub-metric in August 2001.

10

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

13 There were only four rejected LSRs in this sub-metric for August 2001. Such
14 a small universe does not produce a statistically conclusive benchmark
15 comparison. BellSouth met the 10-hour benchmark interval for 10 of the 12
16 rejected LSRs for this sub-metric in October 2001. The 85% benchmark
17 required that 11 of the 12 orders be returned. BellSouth met the benchmark
18 comparison for this sub-metric in September 2001.

19

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

21 There were only five orders in this sub-metric for September 2001. Such a
22 small universe does not produce a statistically conclusive benchmark

1 comparison. BellSouth met the benchmark comparison for this sub-metric in
2 August and October 2001.

3

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

5 BellSouth met the 24-hour benchmark for 29 of the 35 orders in this sub-
6 metric in August 2001. The 85% benchmark required that 30 of the 35
7 rejects for August be returned within the 24-hour period. The rejected LSRs
8 taking longer intervals did not exhibit any distinct patterns or reveal any
9 ordering process issues. BellSouth met the benchmark for this sub-metric in
10 September 2001. There were no CLEC LSRs rejected for this sub-metric in
11 October 2001.

12

13 FOC Timeliness

14 For LSRs submitted electronically, the benchmark is 95% of the FOCs
15 returned within 3 hours. In August, September and October 2001, BellSouth
16 returned 98%, 99% and 98%, respectively, of FOCs for electronically
17 submitted LSRs within the 3-hour benchmark interval. For partially
18 mechanized LSRs, the benchmark is 85% returned within 10 hours.
19 BellSouth met the 10-hour benchmark in August, September and October,
20 with 97% of the FOCs returned for partially mechanized LSRs returned within
21 the 10-hour benchmark period in each month. For LSRs submitted manually,
22 the benchmark is 85% returned within 36 hours. In August, September and
23 October 2001, BellSouth returned 97%, 99% and 96%, respectively, of the

1 FOCs for manually submitted UNE LSRs within the 36-hour window. The
2 sub-metrics that did not meet the benchmark in August, September and/or
3 October are as follows:

4

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

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

10

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

18

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

20 There was only one LSR associated with this sub-metric for August 2001.
21 Such a small universe does not provide a conclusive benchmark comparison.
22 There was no CLEC activity for this sub-metric in September 2001. BellSouth
23 met the benchmark for this sub-metric in October 2001.

1

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

3 (September)

4 There were only four LSRs associated with this sub-metric for September
5 2001. Such a small universe does not provide a conclusive benchmark
6 comparison. BellSouth met the benchmark for this sub-metric in August and
7 October 2001.

8

9 FOC Timeliness / 2w Analog Loop w/LNP Design / Partial Electronic

10 (B.1.12.12) (September)

11 There were only three LSRs associated with this sub-metric for September
12 2001. Such a small universe does not provide a conclusive benchmark
13 comparison. BellSouth met the benchmark for this sub-metric in August and
14 October 2001.

15

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

17 (August/September)

18 There were only four LSRs associated with this sub-metric in August and only
19 seven LSRs in September 2001. Such a small universe does not provide a
20 conclusive benchmark comparison. BellSouth met the benchmark for this
21 sub-metric in October 2001.

22

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

3 There were only eleven LSRs associated with this sub-metric in September
4 2001. Such a small universe does not provide a conclusive benchmark
5 comparison. BellSouth met the 10-hour benchmark for 16 of the 19 FOCs
6 returned for this sub-metric in October 2001. This was only one order short of
7 the 17 orders required to be returned to meet the 85% benchmark. There
8 was no CLEC activity for this sub-metric in August 2001.

9

10 FOC Timeliness / Combo (Loop & Port) / Manual (B.1.13.3) (October)

11 BellSouth met the 36-hour benchmark interval for 52 of the 62 FOCs returned
12 for this sub-metric in October 2001. This was only one order short of the 53
13 orders required to be returned to meet the 85% benchmark. BellSouth met
14 the benchmark for this sub-metric in August and September 2001.

15

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

18 BellSouth determined that the coding for the FOC & Reject Completeness
19 and FOC & Reject Response Completeness (Multiple Responses) measures
20 failed to include rejections that were classified as "auto clarifications."
21 BellSouth has rewritten the code to correct this problem. Effective with the
22 Exhibit update for September data, the program coding was corrected for all
23 the FOC & Reject Completeness sub-metrics for Checklist Item No. 2, UNE

1 Loop products except for: xDSL, 2w Analog Loop w/INP Design, 2w Analog
2 Loop w/INP Non-Design, 2w Analog Loop w/LNP Design, 2w Analog Loop
3 w/LNP Non-Design, INP (Standalone) and LNP (Standalone). The corrected
4 coding for these measures was implemented and effective with the October
5 data. The individual sub-metrics with corrected coding that missed the
6 required benchmarks in September and/or October 2001 will be addressed
7 separately following the next section. BellSouth did not meet the benchmark
8 in August and/or September 2001 for the FOC and Reject Response
9 Completeness and FOC & Reject Response Completeness (Multiple
10 Responses) metrics listed below:

11
12 FOC & Reject Response Completeness / xDSL / Electronic (B.1.14.5)
13 (August/September)

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

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

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

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

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

- 1 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
- 2 & Port) / Electronic (B.1.17.3) (August/September)
- 3 FOC & Reject Response Completeness (Multiple Responses) / Other Design
- 4 / Electronic (B.1.17.14) (September)
- 5 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
- 6 & Port) / Partial Electronic (B.1.18.3) (August/September)
- 7 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /
- 8 Partial Electronic (B.1.18.7) (August)
- 9 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
- 10 Loop Design / Partial Electronic (B.1.18.8) (August/September)
- 11 FOC & Reject Response Completeness (Multiple Responses) / Other Design
- 12 / Partial Electronic (B.1.18.14) (August/September)
- 13 FOC & Reject Response Completeness (Multiple Responses) / Other Non-
- 14 Design / Partial Electronic (B.1.18.15) (September)
- 15 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
- 16 + Port) / Manual (B.1.19.3) (August)
- 17 FOC & Reject Response Completeness (Multiple Responses) / UNE ISDN /
- 18 Manual (B.1.19.6) (September)
- 19 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /
- 20 Manual (B.1.19.7) (September)
- 21 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
- 22 Loop Design / Manual (B.1.19.8) (September)

1 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog

2 Loop Non Design / Manual (B.1.19.9) (September)

3 FOC & Reject Response Completeness (Multiple Responses) / Other Design

4 / Manual (B.1.19.14) (September)

5 BellSouth determined that the coding for the FOC & Reject Completeness
6 and FOC & Reject Response Completeness (Multiple Responses) measures
7 failed to include rejections that were classified as “auto clarifications.”
8 BellSouth has rewritten the code to correct this problem. The coding changes
9 were implemented for some products in August and for the remainder of the
10 products in September. The sub-metric “misses” listed above were for
11 operations prior to the implementation of the coding modifications.

12
13 Effective with October 2001 data, each sub-metric in the Electronic and
14 Partial Electronic sections have been disaggregated between LSRs submitted
15 from the EDI and TAG systems. The following FOC & Reject Response
16 Completeness sub-metrics, for which the program code has been corrected,
17 did not meet the benchmarks for September and/or October 2001:

18
19 FOC & Reject Response Completeness / Other Design / Electronic

20 (B.1.14.14) (September)

21 BellSouth met the benchmark standard for 18 of the 19 (94.74%) responses
22 for this sub-metric in September 2001. Normal rounding conventions would
23 indicate that this small difference is not significantly different from the 95%

1 benchmark level. With a universe size of only 19 orders and a 95%
2 benchmark, a problem with only one order causes a miss for the entire sub-
3 metric. BellSouth continues to focus on this measurement in order to improve
4 results to meet the benchmark. BellSouth met the benchmark for this sub-
5 metric in October 2001.

6

7 FOC & Reject Response Completeness / xDSL / TAG / Partial Electronic

8 (B.1.15.5.2) (October)

9 There was only one order for this sub-metric in October 2001. The small
10 universe size for this sub-metric does not provide a conclusive benchmark
11 comparison.

12

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

14 (September)

15 BellSouth met the benchmark standard for 52 of the 56 (92.86%) 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. BellSouth
18 met the benchmark for this sub-metric in October 2001.

19

20 FOC & Reject Response Completeness / 2w Analog Loop Non-Design /

21 Manual (B.1.16.9) (September)

22 BellSouth met the benchmark standard for 17 of the 18 (94.44%) responses
23 for this sub-metric in September 2001. With a universe size of only 18 orders

1 and a 95% benchmark, a problem with only one order causes a miss for the
2 entire sub-metric. BellSouth continues to focus on this measurement in order
3 to improve results to meet the benchmark. BellSouth met the benchmark for
4 this sub-metric in October 2001.

5

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

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

12

13 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
14 & Port) / EDI / Electronic (B.1.17.3.1) (October)

15 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
16 & Port) / EDI / Electronic (B.1.17.3.1) (October)

17 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
18 Loop Design / EDI / Electronic (B.1.17.8.1) (October)

19 FOC & Reject Response Completeness (Multiple Responses) / Other Design
20 / TAG / Electronic (B.1.17.14.2) (October)

21 FOC & Reject Response Completeness (Multiple Responses) / Other Non-
22 Design / EDI / Electronic (B.1.17.15.1) (October)

1 The due date calculator for some LSRs submitted electronically assigns due
2 dates that are longer than the established Order Completion Interval standard
3 benchmark intervals. In order to correctly apprise the CLECs of the correct
4 due dates for these orders and to ensure that the appropriate OCI intervals
5 are maintained, BellSouth is issuing multiple FOCs or reject notices. This
6 situation will be corrected when the coding for the due date calculator for
7 these orders is implemented.

8

9 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
10 & Port) / EDI / Partial Electronic (B.1.18.3.1) (October)

11 BellSouth met the standard for 32 of the 35 orders for this sub-metric in
12 October 2001. The 95% benchmark required that 34 of the 35 orders meet
13 the criteria. BellSouth continues to focus on this measurement in order to
14 improve results to meet the benchmark.

15

16 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop
17 & Port) / TAG / Partial Electronic (B.1.18.3.2) (October)

18 BellSouth met the standard for 1,213 of the 1,314 orders for this sub-metric in
19 October 2001. The 95% benchmark required that 1,249 of the 1,314 orders
20 meet the criteria. BellSouth continues to focus on this measurement in order
21 to improve results to meet the benchmark.

22

1 FOC & Reject Response Completeness (Multiple Responses) / Line Sharing /

2 TAG / Partial Electronic (B.1.18.7.2) (October)

3 BellSouth met the standard for 17 of the 21 orders for this sub-metric in
4 October 2001. The 95% benchmark required that 20 of the 21 orders meet
5 the criteria. BellSouth continues to focus on this measurement in order to
6 improve results to meet the benchmark.

7

8 FOC & Reject Response Completeness (Multiple Responses) / Other Non-

9 Design / EDI / Partial Electronic (B.1.18.15.1) (October)

10 BellSouth met the standard for 15 of the 16 orders for this sub-metric in
11 October 2001. The 95% benchmark required that all 16 of the 16 orders meet
12 the criteria. BellSouth continues to focus on this measurement in order to
13 improve results to meet the benchmark.

14

15 FOC & Reject Response Completeness (Multiple Responses) / Combo (Loop

16 & Port) / Manual (B.1.19.3) (October)

17 BellSouth met the standard for 94 of the 102 orders for this sub-metric in
18 October 2001. The 95% benchmark required that 97 of the 102 orders meet
19 the criteria. BellSouth continues to focus on this measurement in order to
20 improve results to meet the benchmark.

21

22

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

3 BellSouth met the standard for 52 of the 55 orders for this sub-metric in
4 October 2001. The 95% benchmark required that 53 of the 55 orders meet
5 the criteria. Normal rounding convention indicates that there is no significant
6 difference between the October results for this sub-metric and the 95%
7 benchmark requirement. BellSouth continues to focus on this measurement
8 in order to improve results to meet the benchmark.

9

10 FOC & Reject Response Completeness (Multiple Responses) / 2w Analog
11 Loop Non-Design / Manual (B.1.19.9) (October)

12 BellSouth met the standard for 13 of the 14 orders for this sub-metric in
13 October 2001. The 95% benchmark required that all 14 of the 14 orders meet
14 the criteria. BellSouth continues to focus on this measurement in order to
15 improve results to meet the benchmark.

16

17 Flow-Through

18 Attachment 1E, Items F.1.1 - F.1.3, shows Flow-Through data disaggregated
19 by customer type and for the Summary/Aggregate. Detailed flow-through
20 results for individual CLECs are included in Attachment 2E. The following
21 table shows the Regional Flow-Through results for August, September and
22 October 2001 as compared with the Interim SQM benchmarks.

23

1 % Flow-through Service Requests (F.1.1.1 – F.1.3.4)

<u>Customer Type</u>	<u>August 2001</u>	<u>September 2001</u>	<u>October 2001</u>	<u>Benchmark</u>
Residence	90.86%	90.39%	89.40%	95%
Business	72.14%	68.47%	70.17%	90%
UNE	80.82%	79.33%	76.74%	85%
LNP	84.40%	86.96%	89.09%	85%
Note: August figures reflect revised data included in Revised Attachment 2C filed on November 13, 2001.				

2

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

10

11 BellSouth has established a Flow-Through Improvement Program
 12 Management process that includes seven different internal organizations.
 13 Ongoing analysis is being done to determine trends and identify flow-through
 14 problems. To date, fifteen system enhancements have been identified and
 15 are targeted for Encore releases. Three of the enhancements were

1 implemented in August. The remainder of the enhancements are scheduled
2 for release between October 2001 and January 2002.

3

4 **2. UNE Provisioning Measures**

5 BellSouth met 84% of the overall UNE Provisioning measurements in August,
6 94% in September and 95% in October 2001. The following sub-metrics did
7 not meet the applicable retail analogues in the months of August, September
8 and/or October 2001:

9

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

11 (B.2.1.3.1.3) (August)

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

19

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

21 (August/September)

22 There was only one order for this sub-metric in August and two orders for
23 September 2001. Such a small universe does not provide a statistically

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

3

4 % Jeopardy Notice Interval \geq 48 hours / Combo (Loop & Port) / $<$ 10
5 Circuits (B.2.10.3) (August)

6 The calculations for this measure have been determined to be incorrect. A
7 portion of the coding modifications required to correct this problem were
8 implemented in September 2001. BellSouth is continuing to prepare and test
9 the remainder of the modifications necessary to correct the calculations for
10 this measure.

11

12 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / $<$ 10 Circuits /
13 Non-Dispatch (B.2.19.3.1.2) (August)

14 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / $<$ 10 Circuits /
15 SBO (B.2.19.3.1.3) (August)

16 % Provisioning Troubles w/i 30 Days / Combo (Loop & Port) / $<$ 10 Circuits /
17 Dispatch In (B.2.19.3.1.4) (August)

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

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

3

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

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

13

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

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

20

21 Service Order Accuracy / Design (Specials) / >= 10 Circuits / Non-Dispatch
22 (B.2.34.1.2.2) (August/October)

1 There were only two orders reviewed for this sub-metric in October 2001.
2 The small universe for this sub-metric does not provide a conclusive
3 benchmark comparison. There were no orders reviewed for this sub-metric in
4 either August or September 2001.

5

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

8 There were only four orders reviewed for this sub-metric for September 2001.
9 The small universe for this sub-metric does not provide a conclusive
10 benchmark comparison. BellSouth met the benchmark for this sub-metric in
11 August and October 2001.

12

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

15 BellSouth met 29 of the 36 orders reviewed for this sub-metric in August
16 2001. The 95% benchmark set a requirement of 35 orders for the month of
17 August 2001, based on the number of orders reviewed for the sub-metric.
18 BellSouth continues to focus its efforts on meeting this measure. BellSouth
19 met the benchmark comparison for this sub-metric in September and October
20 2001.

21

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

1

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

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

7

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

9 (August)

10 There were 4 trouble reports in August for the 82 lines in service for this sub-
11 metric. Both the CLECs and BellSouth retail received over 95% trouble free
12 service for this sub-metric in August 2001. BellSouth met the retail analogue
13 comparison for this sub-metric in September 2001. There was no CLEC
14 activity for this sub-metric in October 2001.

15

16 Customer Trouble Report Rate / Other Non-Design / Dispatch (B.3.2.11.1)

17 (October)

18 There were 12 trouble reports in October for the 269 lines in service for this
19 sub-metric. Both the CLECs and BellSouth retail received over 95% trouble
20 free service for this sub-metric in October 2001. BellSouth met the retail
21 analogue comparison for this sub-metric in August and September 2001.

22

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

3 There were 8 troubles reported for the 272 lines in service for this sub-metric
4 in September and 6 troubles reported for the 269 lines in service in October
5 2001. Both the CLECs and BellSouth retail had greater than 97% trouble free
6 service for all in service lines in this sub-metric in both September and
7 October. BellSouth met the retail analogue comparison for this sub-metric in
8 August 2001.

9
10 **4. Other UNE Measures**

11
12 **Pre-Ordering**

13 Service Inquiry for xDSL loops (F.3.1.1), Loop Makeup Manual (F.2.1) and
14 Loop Makeup Electronic (F.2.2) are included in the Pre-Ordering
15 measurements. All measures met the established benchmarks for August
16 and September 2001. The measure that did not meet the benchmark for
17 October 2001 was:

18
19 Loop Makeup Inquiry / Manual (F.2.1) (October)

20 BellSouth returned 9 of the 10 manual loop makeup inquiry requests in less
21 than the 3 business day benchmark interval. Such a small universe of orders
22 for this sub-metric does not provide a conclusive benchmark comparison.

1 BellSouth met the benchmark comparison for this sub-metric in August and
2 September 2001.

3

4 **Operations Support Systems**

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

7

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

9 (August/September/October)

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 (August/September/October)

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 were virtually identical in August and
8 September, with all the measures being less than 1% apart. In October, the
9 difference in the less than 4-second interval responses was about 1.5%, while
10 the differences in the less than 10-second and greater than 10-second
11 interval responses were less than 0.5%. 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) (August/September/October)

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 about 4%, or less, 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) (August/October)

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 August and October, the average response interval for the CLEC requests
7 did 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 August, September and October 2001, both the
10 CLECs and BellSouth retail received over 99.4% of responses in less than 4
11 seconds and less than 0.2% in more than 10 seconds. The less than one-half
12 percent difference for these intervals indicates virtually equivalent service
13 levels for 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 September
22 and October 2001.

23

1 Average Response Interval / OSPCM / Region (D.2.4.8.1) (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 August and September 2001, the CLEC response intervals were 35.16%
8 and 44.19% within 4 seconds as compared to 43.74% and 42.76%,
9 respectively, for the retail analogue. For the less than 10 second response
10 interval, the CLECs received 93.75% and 94.19% of their responses and the
11 retail analogue received 97.38% and 97.18% in August and September,
12 respectively. For the greater than 10 second response interval, the CLECs
13 received 6.25% and 5.81% of their responses and the retail analogue
14 received 2.62% and 2.82% in August and September, respectively. With
15 activity levels of only 128 and 86 requests from this system for the two
16 months, only one to five additional responses within 10 seconds would have
17 brought the sub-metric into parity with the retail analogue. BellSouth met the
18 retail analogue comparison for all three of these sub-metrics in October 2001.

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

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 both August and October, the average response interval for the CLEC
2 requests did not meet the retail analogue intervals for the less than 4-second
3 disaggregation but exceeded both the less than 10 and greater than 10
4 seconds responses. The CLEC response intervals were 77.81% and 71.22%
5 within 4 seconds in August and October, respectively, as compared with
6 79.85% and 72.73% for the retail analogue. These small differences between
7 the CLEC and retail analogue results should not impede the CLECs' ability to
8 compete in this area. BellSouth met the retail analogue comparison for this
9 sub-metric in September 2001.

10
11 **General – Billing**

12 **Usage Data Delivery Timeliness (F.9.2) (August)**

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

3

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

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

13

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

15 This measure tracks the ability of the ordering and billing systems to begin
16 billing a CLEC recurring charges for UNE services on the next invoice after an
17 order has "completed". For UNE, the goal is to meet a benchmark of 90%.
18 The CLEC result for September 2001 was 86.44%. The benchmark was not
19 met in September because of problems encountered in correcting some
20 service order problems in a timely manner. The difference between the
21 benchmark and the CLEC result does not impair a CLEC's ability to support
22 its own end users or to effect billing to those end users in any meaningful

1 way. BellSouth met the benchmark for this sub-metric in August and October
2 2001.

3

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

6 In September and October 2001, the results for this measure were 31.94%
7 and 32.99%, respectively, against a benchmark of 90%. The results were
8 negatively impacted in both months by service orders issued to move billed
9 amounts from one billing account to another connected with CLECs which
10 have filed for bankruptcy. These orders were backdated several months to
11 the date of the bankruptcy. None of these orders impacted the CLECs' total
12 billed amounts but were issued to separate pre-bankruptcy billed amounts
13 from post-bankruptcy amounts. The CLECs are provided with a meaningful
14 opportunity to compete, as these issues do not impede the ability to serve
15 end users.

16

17 Non-Recurring Charge Completeness / Interconnection (F.9.6.3)
18 (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 August and September 2001,
23 BellSouth's performance was 88.16% and 88.27%, respectively. The

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

6

7 **General - Change Management**

8 % Software Release Notices Sent On Time (F.10.1) (October)

9 Average Software Release Notice Delay Days (F.10.2) (October)

10 BellSouth met the specified benchmark intervals for one of the two software
11 releases issued in October 2001. BellSouth met the benchmark intervals for
12 all releases in August and September 2001.

13

14 % Change Management Documentation Sent On Time (F.10.3) (August)

15 Average Documentation Release Delay Days (F.10.5) (August)

16 One of the three Change Management documentation letters issued in
17 August was released with less than the 30-day benchmark window. This
18 letter was, however, primarily dealing with clarifications and information on
19 existing documentation and business rules and did not require CLEC coding
20 changes. There was no activity for these sub-metrics in September 2001.
21 BellSouth met the benchmark for these sub-metrics in October 2001.

22

23 **General – New Business Requests**

1 % Quotes Provided in 10 Business Days (F.11.2.1) (September)

2 There were only seven requests processed in September 2001 in sub-metric
3 F.11.2.1. Such a small universe does not provide a statistically conclusive
4 benchmark comparison. This is a regional measure and none of the
5 requests were processed in Kentucky. BellSouth met the benchmark for this
6 sub-metric in August 2001. There was no CLEC activity in this sub-metric in
7 October 2001.

8

9 **General – Ordering**

10 % Acknowledgement Message Timeliness / EDI (F.12.1.1) (August)

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

16

17 % Acknowledgement Message Completeness / EDI (F.12.2.1)

18 (August/September/October)

19 BellSouth failed to satisfy the completeness criteria for 302 of the 86,217
20 messages returned in August 2001. In September 2001, there were only 2
21 failed messages (0.003%) of the 67,850 total messages returned for the
22 month, and there were only 18 failed messages (0.02%) of the 87,896 total
23 messages in October 2001. A Stability Plan to improve EDI availability has

1 been put into effect. This plan includes implementing both a manual
2 application monitoring schedule (24 / 7) and increased mechanized
3 application alarms to more adequately monitor and react to application
4 outages. The database parameters have also been adjusted to allow for
5 maximum processing in the EDI system.

6
7 % Acknowledgement Message Completeness / TAG (F.12.2.2)
8 (August/September/October)

9 BellSouth failed to deliver 20 (0.01%) of the 199,829 messages in August, 5
10 (0.003%) of the 167,159 messages in September and 4 (0.002%) of the
11 195,248 messages in October 2001 for this sub-metric. Analysis continues to
12 identify any issues in this process. However, such a small number of failed
13 records have not revealed any systemic process problems.

14
15 **D. CHECKLIST ITEM 4 – UNBUNDLED LOCAL LOOPS**

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

19
20 For purposes of discussion in this checklist item, the local loop sub-metrics
21 have been separated into two mode-of-entry groups, xDSL and
22 SL1/SL2/Digital. The xDSL group includes xDSL (ADSL, HDSL, UCL), ISDN
23 and Line Sharing sub-metrics. The SL1/SL2/Digital group includes the design

1 and non-design 2-wire analog loops, as well as the 2-wire and 4-wire digital
2 loop sub-metrics.

3

4 **xDSL Group**

5

6 **1. Provisioning Measures**

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

9

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

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

16

17 **2. Maintenance & Repair Measures**

18

19 Customer Trouble Report Rate / xDSL Loops / Dispatch (B.3.2.5.1) (October)

20 There were only 6 trouble reports for the 359 lines in service for this sub-
21 metric in October 2001. Both the CLECs and BellSouth retail had greater
22 than 98% trouble free service for all in service lines in this sub-metric in

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

10

11 Customer Trouble Report Rate / Line Sharing / Non-Dispatch (B.3.2.7.2)
12 (August/October)

13 The CLEC aggregate only reported three troubles for this sub-metric in
14 August and ten troubles in October 2001. Both the CLECs and BellSouth
15 retail had greater than 95% trouble free service for all in service lines in this
16 sub-metric in October and over 98% trouble free services in August 2001. Of
17 the ten troubles reported in October for this sub-metric, all ten were reported
18 by the same CLEC and nine of the ten were closed as “no trouble found.”
19 BellSouth met the retail analogue comparison for this sub-metric in
20 September 2001.

21

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

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

5

6 **SL1/SL2/Digital Loop Group**

7

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

12

13 Held Order Interval / Digital Loop \geq DS1 / $<$ 10 Circuits / Facility

14 (B.2.3.19.1.1) (August)

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

20

21 % Jeopardies / Digital Loop \geq DS1 / Electronic (B.2.5.19)

22 (August/September/October)

1 There were only 9 orders associated with this sub-metric in August, 11 orders
2 in September and 7 orders in October 2001. Even though six of the nine
3 orders for August, six of the eleven orders for September and five of the
4 seven orders for October were shown in jeopardy status, all but one of the
5 August jeopardies, all but one of the September jeopardies and all of the
6 jeopardies for October were resolved prior to the due dates and the orders
7 were completed as scheduled. The small universe size for this sub-metric
8 does not provide a statistically conclusive comparison to the retail analogue.

9

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

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

16

17 % Provisioning Troubles w/i 30 Days / 2w Analog Loop Design / < 10 Circuits
18 / Dispatch (B.2.19.8.1.1) (August)

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

23

1 % Provisioning Troubles w/i 30 Days / Digital Loops < DS1 / < 10 Circuits /

2 Dispatch (B.2.19.18.1.1) (August)

3 There were 10 troubles reported for the 104 orders that completed in the 30
4 days prior to August 2001 for this sub-metric. There were no systemic
5 problems identified for the troubles that were analyzed for the month.
6 BellSouth met the retail analogue comparison for this sub-metric in
7 September and October 2001.

8

9 Average Completion Notice Interval / 2w Analog Loop Design / < 10 Circuits /

10 Dispatch (B.2.21.8.1.1) (August/September)

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

1 for the CLECs' measurement raises the average, which sometimes results in
2 a miss. Specific Service Representatives within the Work Management
3 Centers have been assigned to resolve any completion issues that are
4 required. Providing specific training and dedicating personnel to this task
5 should reduce the difference between the CLEC and retail analogue results.
6 There was no CLEC activity for this sub-metric in October 2001.

7

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

9

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

13

14

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

16

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

20

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 1E, Sections F.6, F.7 and F.8, BellSouth met the
6 benchmark/analogue requirements of Checklist Items 7a and 7b in October
7 2001, as it had in August and September. Even though BellSouth tracks and
8 reports these measures, the processes used in providing these services are
9 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 August and October and for two of the
15 four sub-metrics in September 2001. See items F.13.3.1 through F.13.3 in
16 Attachment 1E for further details. The sub-metrics that did not meet the
17 appropriate benchmark in August, September and/or October 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 August and October 2001.

6

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

9 The measure indicated that 23 of 24 NXXs were loaded by their effective date
10 for the entire BellSouth region in August, 39 of 40 NXXs loaded by their
11 effective date in September and 45 of 48 NXXs loaded by their effective date
12 in October 2001. This is a regional measure. There were no missed dates in
13 Kentucky for this sub-metric in August or October 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 August,
20 September and/or October 2001 except for the following:

21

22 % Missed Installation Appointments / LNP (Standalone) / < 10 Circuits / Non-
23 Dispatch (B.2.18.17.1.2) (August)

1 BellSouth missed 2 of the 717 orders scheduled for this sub-metric in August
2 2001. The CLECs and BellSouth retail had over 99.7% of all orders
3 completed as scheduled in August. The statistical test shows that the
4 measurement does not meet the fixed critical value when compared with the
5 retail analogue, but BellSouth's actual performance for both CLECs and its
6 own retail operations is at a very high level – in this case over 99%. From a
7 practical point of view, the CLECs' ability to compete has not been hindered
8 even though the statistical results may technically show that BellSouth failed
9 to meet the benchmark/analogue. BellSouth met the retail analogue
10 comparison for this sub-metric in September and October 2001.

11
12 Average Completion Notice Interval / LNP (Standalone) / < 10 Circuits / Non-
13 Dispatch (B.2.21.17.1.2) (August/September/October)

14 A root cause analysis of this measure uncovered a system coding problem in
15 the Barney data extract process. It is anticipated that this correction will be
16 implemented during November 2001.

17
18 Disconnect Timeliness / LNP / < 10 Circuits (B.2.31)

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

1

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

10

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

1 on end users, and, therefore, the measurements will be shown blank until a
2 resolution is reached on this issue.

3

4

K. CHECKLIST ITEM 14 – RESALE

5

6 BellSouth met or exceeded the benchmarks or retail analogues for 82% of the
7 Resale sub-metrics having CLEC activity in October 2001. In August and
8 September 2001, BellSouth met or exceeded the benchmarks/analogues for
9 90% and 94%, respectively, of the resale sub-metrics. The details for the
10 October data are delineated in Attachment 1E, Items A.1.1.1.1 through A.4.2.

11

12 During the three-month period from August through October 2001, there were
13 129 Resale sub-metrics that had data for all three months and were
14 compared to benchmarks or retail analogues. Of those 129 sub-metrics, 118
15 (92%) sub-metrics met the relevant criteria in at least two of the three months.

16

1. Resale Ordering Measures

17

FOC Timeliness

18

19

20 In August 2001, BellSouth returned FOCs for 8,753 Resale LSRs and met the
21 relevant benchmark on 99% of all FOCs. Of the 8,753 LSRs, 7,405 were fully
22 mechanized with 99% meeting the 3-hour benchmark. In September 2001,
23 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

1 mechanized with 99.7% meeting the 3-hour benchmark. In October 2001,
2 BellSouth returned FOCs for 8,731 Resale LSRs and met the relevant
3 benchmark on 99% of all FOCs. Of the 8,731 LSRs, 7,304 were fully
4 mechanized with 99.8% meeting the 3-hour benchmark. See Attachment 1E,
5 Sections A.1.9 through A.1.13 for further details.

6

7 **Reject Interval**

8 In August 2001, 1,576 LSRs were rejected, with 96% returned within the
9 relevant benchmark period. Of the LSRs rejected in August, 58% were
10 submitted electronically with 96% returned within the 1-hour benchmark. In
11 September 2001, 1,086 LSRs were rejected, with 96% returned within the
12 relevant benchmark period. Of the LSRs rejected in September, 54% were
13 submitted electronically with 96% returned within the 1-hour benchmark. In
14 October 2001, 1,473 LSRs were rejected, with 95% returned within the
15 relevant benchmark period. Of the LSRs rejected in October, 50% were
16 submitted electronically with 95% returned within the 1-hour benchmark. See
17 Attachment 1E, Items A.1.4 through A.1.8 for further details.

18

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

21

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

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

1 The current benchmark for these two sub-metrics is $\geq 97\%$ within one hour.
2 BellSouth is conducting a detailed root cause analysis of the process for
3 electronic rejects. This analysis addresses the ordering systems (EDI, TAG,
4 and LENS) used by the CLECs and the back-end legacy applications, such
5 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 one-hour benchmark in August and September were issued
9 between 11:00 p.m. and 4:30 a.m. Between these hours, the system is
10 unable to process LSRs because certain of the back-end legacy systems are
11 out of service. LSRs submitted during these periods should have been
12 excluded from the measurement. BellSouth implemented a program coding
13 change in September to exclude these LSRs from this measure.

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

1 Consequently, BellSouth's performance level is inappropriately understated.

2 BellSouth is currently working to determine a fix for this issue.

3

4 Reject Interval / Design (Specials) / Electronic (A.1.4.3) (October)

5 There was only one rejected LSR for this sub-metric in October 2001. The
6 small universe for this sub-metric does not provide a conclusive benchmark
7 comparison. There was no CLEC activity for this sub-metric in either August
8 or September 2001.

9

10 Reject Interval / PBX / Manual (A.1.8.4) (October)

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

15

16 FOC Timeliness / Design (Specials) / Partial Electronic (A.1.12.3) (October)

17 There was only one LSR associated with this sub-metric in October 2001.
18 The small universe of orders for this sub-metric does not provide a conclusive
19 benchmark comparison. BellSouth met the benchmark comparison for this
20 sub-metric in August and September 2001.

21

22 FOC Timeliness / PBX) / Partial Electronic (A.1.12.4) (October)

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

6

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

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

12

13 FOC Timeliness / ISDN / Manual (A.1.13.6) (October)

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

18

19 FOC & Reject Response Completeness and FOC & Reject Response

20 Completeness (Multiple Responses)

21 BellSouth has determined that the coding for the FOC & Reject
22 Completeness and FOC & Reject Response Completeness (Multiple
23 Responses) measures failed to include rejections that were classified as “auto

1 clarifications.” BellSouth is in the process of rewriting the code to correct this
2 problem, and the change will impact all FOC & Reject Completeness and
3 FOC & Reject Response Completeness (Multiple Responses) measures.
4 Effective with this Exhibit update for September data, the program coding has
5 been corrected for all the FOC & Reject Completeness sub-metrics for
6 Checklist Item No. 14, Resale products. The individual sub-metrics with
7 corrected coding and that missed the required benchmarks in September
8 and/or October 2001 will be addressed separately following the next section.
9 BellSouth did not meet the benchmark in August 2001 for the FOC and Reject
10 Response Completeness or for the FOC & Reject Response Completeness
11 (Multiple Responses) metrics listed below:

12
13 FOC Reject & Response Completeness / Design (Specials) / Manual

14 (A.1.16.3) (August)

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

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

17 Partially Electronic (A.1.18.1) (August/September)

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

19 Partially Electronic (A.1.18.2) (August/September)

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

21 (Specials) / Partially Electronic (A.1.18.3) (September)

22 FOC Reject & Response Completeness (Multiple Responses) / PBX /

23 Partially Electronic (A.1.18.4) (September)

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

2 Manual (A.1.19.1) (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 BellSouth determined that the coding for the FOC & Reject Completeness
8 and FOC & Reject Response Completeness (Multiple Responses) measures
9 failed to include rejections that were classified as “auto clarifications.”
10 BellSouth has rewritten the code to correct this problem. The coding changes
11 were implemented for some products in August and for the remainder of the
12 products in September. The sub-metric “misses” listed above were for
13 operations prior to the implementation of the coding modifications.

14

15 Effective with October 2001 data, each sub-metric in the Electronic and
16 Partial Electronic sections have been disaggregated between LSRs submitted
17 from the EDI and TAG systems. The following FOC & Reject Response
18 Completeness sub-metrics, for which the program code has been corrected,
19 did not meet the benchmarks for September and/or October 2001:

20

21 FOC Reject & Response Completeness / Business / Partial Electronic

22 (A.1.15.2) (September)

1 BellSouth met the benchmark standard for 181 of the 192 (94.27%)
2 responses for this sub-metric in September 2001. This result was only two
3 responses short of meeting the benchmark for the sub-metric for the month.
4 BellSouth continues to focus on this measurement in order to improve results
5 to meet the benchmark.

6

7 FOC Reject & Response Completeness / Residence / Manual (A.1.16.1)

8 (October)

9 BellSouth met the benchmark standard for 132 of the 139 (94.96%)
10 responses for this sub-metric in October 2001. Under normal rounding
11 convention, there is no significant difference between the CLEC result for this
12 sub-metric and the benchmark criteria. BellSouth met the benchmark for this
13 sub-metric in August and September 2001.

14

15 FOC Reject & Response Completeness / Design (Specials) / Manual

16 (A.1.16.3) (October)

17 BellSouth met the benchmark standard for 23 of the 26 responses for this
18 sub-metric in October 2001. The 95% benchmark required that 25 of the 26
19 orders meet the criteria. BellSouth continues to focus on this measurement in
20 order to improve results to meet the benchmark. BellSouth met the
21 benchmark for this sub-metric in September 2001.

22

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

2 (September)

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

9

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

11 (September/October)

12 BellSouth met the benchmark standard for 9 of the 10 responses for this sub-
13 metric in September and for 11 of the 12 responses in October 2001. With
14 universe sizes of only 10 or 12 orders and a 95% benchmark, a problem with
15 only one order causes a miss for the entire sub-metric. BellSouth continues
16 to focus on this measurement in order to improve results to meet the
17 benchmark.

18

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

20 EDI / Electronic (A.1.17.1.1) (October)

21 BellSouth met the benchmark standard for 393 of the 496 responses for this
22 sub-metric in October 2001. The 95% benchmark required that 472 of the

1 496 orders meet the criteria. BellSouth continues to focus on this
2 measurement in order to improve results to meet the benchmark.

3

4 FOC Reject & Response Completeness (Multiple Responses) / Residence /
5 EDI / Partial Electronic (A.1.18.1.1) (October)

6 BellSouth met the benchmark standard for 151 of the 159 (94.97%)
7 responses for this sub-metric in October 2001. Under normal rounding
8 convention, there is no significant difference between the CLEC result for this
9 sub-metric and the benchmark criteria.

10

11 FOC Reject & Response Completeness (Multiple Responses) / Residence /
12 TAG / Partial Electronic (A.1.18.1.2) (October)

13 BellSouth met the benchmark standard for 1,040 of the 1,150 responses for
14 this sub-metric in October 2001. The 95% benchmark required that 1,093 of
15 the 1,150 orders meet the criteria. BellSouth continues to focus on this
16 measurement in order to improve results to meet the benchmark.

17

18 FOC Reject & Response Completeness (Multiple Responses) / Business /
19 EDI / Partial Electronic (A.1.18.2.1) (October)

20 There was only one order for this sub-metric in October 2001. The small
21 universe for this sub-metric does not provide a conclusive benchmark
22 comparison.

23

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

2 TAG / Partial Electronic (A.1.18.2.2) (October)

3 BellSouth met the benchmark standard for 429 of the 473 responses for this
4 sub-metric in October 2001. The 95% benchmark required that 450 of the
5 473 orders meet the criteria. BellSouth continues to focus on this
6 measurement in order to improve results to meet the benchmark.

7

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

9 Manual (A.1.19.1) (September/October)

10 BellSouth met the benchmark standard for 102 of the 110 responses for this
11 sub-metric in September and for 118 of the 132 responses in October 2001.
12 The 95% benchmark required that 105 of the 110 responses in September
13 and 126 of the 132 responses in October meet the criteria. BellSouth
14 continues to focus on this measurement in order to improve results to meet
15 the benchmark.

16

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

18 Manual (A.1.19.2) (September/October)

19 BellSouth met the benchmark standard for 73 of the 79 responses for this
20 sub-metric in September and for 60 of the 71 responses in October 2001.
21 The 95% benchmark required that 76 of the 79 responses in September and
22 68 of the 71 responses in October meet the criteria. BellSouth continues to

1 focus on this measurement in order to improve results to meet the
2 benchmark.

3

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

6 BellSouth met the benchmark standard for 19 of the 21 responses for this
7 sub-metric in September 2001. The 95% benchmark required that 20 of the
8 21 orders meet the criteria. BellSouth continues to focus on this
9 measurement in order to improve results to meet the benchmark. BellSouth
10 met the benchmark for this sub-metric in October 2001.

11

12 FOC Reject & Response Completeness (Multiple Responses) / PBX / Manual
13 (A.1.19.4) (October)

14 BellSouth met the benchmark standard for 10 of the 11 responses for this
15 sub-metric in October 2001. The 95% benchmark required that all 11 of the
16 11 orders meet the criteria. BellSouth continues to focus on this
17 measurement in order to improve results to meet the benchmark. BellSouth
18 met the benchmark for this sub-metric in September 2001.

19

20 **2. Resale Provisioning Measures**

21 BellSouth met or exceeded the benchmark or retail analogue for 93% of all
22 Resale provisioning measures in August, 98% in September, and 90% in

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

3

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

6

7 Order Completion Interval / PBX / >= 10 Circuits / Non-Dispatch (A.2.1.4.2.2)

8 There were only two orders for this sub-metric in October 2001. The small
9 universe of orders for this sub-metric does not provide a statistically
10 conclusive comparison to the retail analogue. There was no CLEC activity for
11 this sub-metric in either August or September 2001.

12

13

14 % Jeopardies / Residence (A.2.4.1) (August)

15 BellSouth completed as scheduled over 99% of the installation appointments
16 for this sub-metric in both September and October. There were no systemic
17 installation issues identified for the 38 orders placed in jeopardy status in
18 August or for the 21 orders placed in jeopardy status in October. None of the
19 jeopardies in this sub-metric resulted in held orders in either August or
20 October 2001. BellSouth met the retail analogue comparison for this sub-
21 metric in September 2001.

22

23 % Jeopardy Notice >= 48 hours / Residence / Mechanized (A.2.9.1) (August)

1 The calculations for this measure have been determined to be incorrect. A
2 portion of the coding modifications required to correct this problem were
3 implemented in September 2001. BellSouth is continuing to prepare and test
4 the remainder of the modifications necessary to correct the calculations for
5 this measure.

6

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

9 For the period August through October 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." In October, 44 of the
15 169 trouble reports (26%) were closed as "TOK/FOK." With a reduction in the
16 number of reports that end up as "no trouble found" incidents, this sub-metric
17 would meet the retail analogue comparison. Analysis of the troubles found for
18 this sub-metric revealed that a majority were related to cable and drop
19 facilities distributed throughout the state with no distinct pattern or trend.

20

21 % Provisioning Troubles w/i 30 days / Business / < 10 Circuits / Dispatch
22 (A.2.12.2.1.1) (October)

1 In October 2001, there were a total of 4 troubles reported for the 52 orders
2 that completed in the prior 30 days. There was no systemic pattern to the
3 troubles reported in October. BellSouth met the retail analogue comparison
4 for this sub-metric in August and September 2001.

5

6 Service Order Accuracy / Residence / < 10 Circuits / Dispatch (A.2.25.1.1.1)
7 (October)

8 There were only five orders reviewed for this sub-metric in October 2001.
9 This small universe size does not provide a conclusive benchmark
10 comparison. BellSouth met the benchmark for this sub-metric in August and
11 September 2001.

12

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

15 BellSouth met the standard for 295 of the 329 orders reviewed in this sub-
16 metric for August 2001. The 95% benchmark set a requirement of 313 orders
17 in August based on the quantity of orders for this sub-metric. BellSouth
18 continues to focus on this measurement in order to improve results to meet
19 the benchmark. BellSouth met the benchmark for this sub-metric in
20 September and October 2001.

21

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

1 BellSouth met the standard for 55 of the 60 orders reviewed in this sub-metric
2 for October 2001. The 95% benchmark set a requirement of 57 orders based
3 on the quantity of orders for this sub-metric. BellSouth continues to focus on
4 this measurement in order to improve results to meet the benchmark.
5 BellSouth met or exceeded the benchmark for this sub-metric in August and
6 September 2001.

7

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

10 BellSouth met the standard for 7 of the 8 orders reviewed in this sub-metric
11 for August 2001. The small universe for this measurement does not provide a
12 conclusive benchmark comparison. There was no CLEC activity for this sub-
13 metric in either September or October 2001.

14

15 Service Order Accuracy / Design (Specials) / < 10 Circuits / Non-Dispatch
16 (A.2.25.3.1.2) (October)

17 There was only one orders reviewed for this sub-metric in October 2001. This
18 small universe size does not provide a conclusive benchmark comparison.
19 BellSouth met the benchmark for this sub-metric in August 2001. There was
20 no CLEC activity for this sub-metric in September 2001.

21

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

23

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

5

6 % Missed Repair Appointments / Centrex / Dispatch (A.3.1.5.1) (October)

7 BellSouth missed one of five repair appointments scheduled for this sub-
8 metric in October 2001. Such a small universe does not provide a statistically
9 conclusive comparison to the retail analogue. BellSouth met or exceeded the
10 retail analogue for this sub-metric in August and September 2001.

11

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

14 In August 2001, the CLECs had over 96% trouble free service for the 19,173
15 lines in service in this sub-metric. In September 2001, the CLECs had over
16 97% trouble free service for the 19,557 lines in service. The trouble report
17 rate for CLECs for this sub-metric was approximately 0.4% higher than for the
18 retail analogue for both August and September. Eighty-three of the August
19 trouble reports were closed as "TOK/FOK." In September, eighty of the
20 trouble reports were closed as "TOK/FOK." Excluding these reports, the
21 CLEC trouble report rate would have been the same as, or less than for
22 BellSouth retail. BellSouth met the retail analogue comparison for this sub-
23 metric in October 2001.

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

There was only 1 trouble report for the 667 lines in service for this sub-metric 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 both 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. BellSouth met the retail analogue comparison for this sub-metric in October 2001.

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

2 (August/September/October)

3 There were 5 trouble reports for the 597 lines in service for this sub-metric in
4 August, 13 trouble reports for the 582 lines in service in September and 5
5 trouble reports for the 572 lines in service in October 2001. In September, of
6 the 13 troubles reported, 10 were at the same customer location, and all were
7 repaired in less than one hour. Of the 5 troubles reported for this sub-metric
8 in October, 4 were closed as “no trouble found.” BellSouth provided 99%,
9 97% and 99% trouble free service for both retail and the CLECs for this sub-
10 metric for the months of August, September and October, respectively. From
11 a practical point of view, the CLECs’ ability to compete has not been hindered
12 even though the statistical results may technically show that BellSouth failed
13 to meet the benchmark/analogue.

14
15 Customer Trouble Report Rate / ISDN / Dispatch (A.3.2.6.1) (October)

16 There were only 3 trouble reports for the 598 lines in service for this sub-
17 metric in October 2001. BellSouth provided over 99% trouble free service for
18 both retail and the CLECs for this sub-metric in October. From a practical
19 point of view, the CLECs’ ability to compete has not been hindered even
20 though the statistical results may technically show that BellSouth failed to
21 meet the benchmark/analogue. BellSouth met the retail analogue
22 comparison for this sub-metric in August and September 2001.

23

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

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

6

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

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

13

14 % Repeat Troubles within 30 days / Business / Dispatch (A.3.4.2.1) (October)

15 There were 24 repeat reports for the 99 total trouble reports for this sub-
16 metric in October 2001. Of the 24 repeat reports, 9 were closed as “no
17 trouble found.” Excluding these reports, the result would be lower for the
18 CLECs than for the retail analogue for the month. BellSouth met the retail
19 analogue for this sub-metric in August and September 2001.

20

21 % Repeat Troubles within 30 days / Business / Dispatch (A.3.4.2.2) (October)

22 There were 8 repeat reports for the 34 total trouble reports for this sub-metric
23 in October 2001. Of the 8 repeat reports, 6 were closed as “no trouble

1 found.” Excluding these reports, the result would be lower for the CLECs
2 than for the retail analogue for the month. BellSouth met the retail analogue
3 for this sub-metric in August and September 2001.

4

5 % Repeat Troubles within 30 days / PBX / Dispatch (A.3.4.4.1) (September)

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

10

11 % Repeat Troubles within 30 days / Centrex / Non-Dispatch (A.3.4.5.2)
12 (October)

13 There was only one trouble report for this sub-metric in October 2001. The
14 small universe for this measurement does not provide a statistically
15 conclusive comparison with the retail analogue. There was no CLEC activity
16 for this sub-metric in August 2001. BellSouth met the retail analogue
17 comparison for this sub-metric in September 2001.

18

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

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

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

3

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

5 There was one trouble report in this sub-metric that resulted in an out-of-
6 service condition for more than 24 hours in August 2001. Such a small
7 universe for this sub-metric does not provide a statistically conclusive
8 comparison to the retail analogue. BellSouth met the retail analogue
9 comparison for this sub-metric in September 2001. There was no CLEC
10 activity for this sub-metric in October 2001.

11

12 Out of Service > 24 Hours / Centrex / Dispatch (A.3.5.5.1) (October)

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

18

19 **III. Summary**

20

21 As stated in the Introduction to the Analysis of Performance Measurements
22 section, BellSouth met or exceeded the benchmarks/retail analogues for 577
23 of the 661 sub-metrics (87%) for which there was CLEC activity in October

1 2001. In September 2001, 519 of 574 sub-metrics (90%) met or exceeded
2 the benchmarks or retail analogues. BellSouth met or exceeded the criteria
3 for 437 of the 509 sub-metrics (86%) for which there was CLEC activity in
4 August 2001.

5

6 During the three-month period, August through October 2001, excluding the
7 measures with calculation problems, there were a total of 464 sub-metrics
8 that had CLEC activity for all three months and that were compared with
9 either benchmarks or retail analogues. Of these 464 sub-metrics, 416 sub-
10 metrics (90%) satisfied the comparison criteria during at least two of the three
11 months.

12