

# **BellSouth Service Quality Measurement Plan (SQM)**

**Kentucky Performance Metrics**

**Measurement Descriptions**

**KPMG Initiated Changes to Version 1.00**

**Issue Date: December 16, 2002**

## Section 1: Operations Support Systems (OSS)

OSS-1:	Average Response <u>Interval Time</u> and <u>Percent Within Response Interval</u> (Pre-Ordering/Ordering)
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### Change Proposed:

BellSouth proposes to change “Average Response Time and Response Interval” to “Average Response Interval and Percent Within Interval” in the Definition, Business Rules and Calculation in this measure.

**Definition:** The Average average response time and response intervals and percent within the interval is are the average times and number/percent of requests responded to within certain intervals for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for Telephone Numbers (TNs), and Customer Service Records (CSRs).

**Business Rules:** The average response time/interval for retrieving pre-order/order information from a given legacy system is determined by summing the response times for all requests submitted to the legacy systems during the reporting period and dividing by the total number of legacy system requests for that month.

The response interval starts when the application (LENS or TAG for CLECs and RNS or ROS for BellSouth) submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number/percent of accesses to the legacy systems during the reporting period which take less than 2.3 seconds, the number/percent of accesses which take more than 6 seconds, and the number/percent which are occur in less than or equal to 6.3 seconds are also captured.

### Calculation:

Response Time-Interval = (a – b)

Average Response Time-Interval = c / d

- c = Sum of Response Times/Intervals

Percent Within Interval = (e/f) X 100

- e = Sum of Response Times for Interval
- f = Number of Legacy Requests During the Reporting Period for System

### Rationale:

In KPMG’s FL Observation 120 KPMG reported that the reported values for the response time intervals for the “Operations Support Systems: Average Response Time and Response Interval” SQM are reported as percentages and are inconsistent with the documented definition. BellSouth proposed these updates to the SQM Definition, Business Rules, and Calculations to reflect the way the measurement is reported. These changes were also reflected in KPMG’s recommendations for this measure in its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002).

### Change Proposed:

BellSouth proposes to make the following change to the **Exclusions** for this measure:

Add: Corrupt records

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG recommended that BellSouth modify its SQM documentation to include an exclusion for “corrupt” records.

<b>PO-2:</b>	<b>Loop Make Up – Response Time - Electronic</b>
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**Change Proposed:**

BellSouth proposes to make the following change to the **Exclusions** for this measure:

- Manually submitted inquiries
- ~~Designated Holidays are excluded from the interval calculation~~
- Canceled Requests
- Scheduled OSS Maintenance

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG recommended that BellSouth should modify its SQM documentation to delete the exclusion for designated holidays. KMPG stated that this exclusion should not be used for an SQM that measures an automated process.

## Section 2: Ordering

<b>O-1:</b>	<b>Acknowledgement Message Timeliness</b>
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### Change Proposed:

BellSouth proposes to make the following changes to the **Definition** for this measure:

This measurement provides the response interval and percent within the interval from the time an LSR or transmission (may contain multiple LSRs from one or more CLECs in multiple states) is electronically submitted via EDI or TAG until an acknowledgement notice is sent by the system.

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG stated that the Definition and Calculation for this measure should be updated to reflect “the red-line SQM changes associated with the Florida Third Party OSS Test.” The above proposed change to the Definition is one of the red-line SQM changes referenced by KPMG.

### Change Proposed:

BellSouth proposes to make the following changes to the **Exclusions** for this measure:

Change “None” to “Manually Submitted LSRs”

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG noted that since this measure includes only transactions that are electronically submitted, manually submitted LSRs should not be included. It therefore recommended that “manually submitted LSRs” be reflected as an exclusion in the documentation for this measure.

### Change Proposed:

BellSouth proposes to add the following formula to the **Calculation** for this measure:

**Percent within Interval = (e / f) X 100**

- e = Total number of electronically submitted messages / LSRs received, from CLECs via EDI or TAG respectively, in the Reporting Period.
- f = Total number of electronically submitted messages / LSRs acknowledged in the Reporting period.

### Rationale:

In KPMG’s FL Observation 112, KPMG determined that the formula specified in the “Ordering: Acknowledgement Message Timeliness” (SQM) document is inconsistent with the benchmark ordered by the FPSC (PMR2). These changes correct the deficiencies noted by KPMG. This change was also recommended in KPMG’s FL Adequacy Study (September 2002).

<b>O-3:</b>	<b>Percent Flow-Through Service Requests (Summary)</b>
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### Change Proposed:

BellSouth proposes to make the following changes to the **Business Rules** for this measure:

In the Manual Fallout table, change Item “3. Some Partial migrations” to “3. Some Partial migrations (All LNP partial migrations)” and add “14. LNP Only – Supplemental LSRs except Supps of 04 (Due Date changes) on Req Type CB”

**Rationale:**

In KPMG’s FL KPMG Exception 121, KPMG determined that BellSouth did not specify that partial migrations included LNP partial migrations. BellSouth proposed these additions to the categories for Manual Fallout to address the omissions identified by KPMG.

**Change Proposed:**

BellSouth proposes to make the following changes to the **Calculation** for this measure:

In the calculation for “**Percent Flow Through**”, change as shown below:

d = the numbers of LSRs that are returned to the CLEC for auto clarification

e = the number of LSRs that are returned to the CLEC from the LCSC due to CLEC error~~contain errors made by CLECs~~

In the calculation for “**Percent Achieved Flow Through**”, change as shown below:

c = the number of LSRs that are returned to the CLEC for auto clarification”

d = the number of LSRs that are returned to the CLEC from the LCSC due to CLEC error~~contain errors made by CLECs~~

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Review (September 2002), KPMG’s recommended these changes to avoid confusion on the calculation of these measures. KPMG noted that since clarifications and errors are synonymous, “d” and “e” for Percent Flow Through and “c” and “d” for Percent Achieved Flow Through could be interpreted to double count the number of clarifications and errors.

<b>O-4:</b>	<b>Percent Flow-Through Service Requests (Detail)</b>
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**Change Proposed:**

BellSouth proposes to make the following changes to the **Business Rules** for this measure:

In the Manual Fallout table, change Item “3. Some Partial migrations” to “3. Some Partial migrations (All LNP partial migrations)” and add “14. LNP Only – Supplemental LSRs except Supps of 04 (Due Date changes) on Req Type CB”

**Rationale:**

In KPMG’s FL KPMG Exception 121, KPMG determined that BellSouth did not specify that partial migrations included LNP partial migrations. BellSouth proposed these additions to the categories for Manual Fallout to address the omissions identified by KPMG.

**Change Proposed:**

BellSouth proposes to make the following changes to the **Calculation** for this measure:

In the calculation for “**Percent Flow Through**”, change as shown below:

d = the numbers of LSRs that are returned to the CLEC for auto clarification

e = the number of LSRs that are returned to the CLEC from the LCSC due to CLEC error~~contain errors made by CLECs~~

In the calculation for “**Percent Achieved Flow Through**”, change as shown below:

c = the number of LSRs that are returned to the CLEC for auto clarification”

d = the number of LSRs that are returned to the CLEC from the LCSC due to CLEC error~~contain errors made by CLECs~~

## Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Review (September 2002), KPMG's recommended these changes to avoid confusion on the calculation of these measures. KPMG noted that since clarifications and errors are synonymous, "d" and "e" for Percent Flow Through and "c" and "d" for Percent Achieved Flow Through could be interpreted to double count the number of clarifications and errors.

<b>O-8:</b>	<b>Reject Interval</b>
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## Change Proposed:

BellSouth proposes to add the following sentence to the **Definition** for this measure:

When there are multiple rejects on a single LSR, the first reject issued is used for the calculation of the interval duration.

## Rationale:

This issue was noted in KPMG's FL Exception 36. The sentence added to the definition clarifies which reject issued is used to calculate the interval duration.

## Change Proposed:

BellSouth proposes to make the following changes to the **Exclusions** for this measure:

~~Residence Resale Group—Monday through Saturday 7:00PM until 7:00AM  
From 7:00 PM Saturday until 7:00 AM Monday~~

~~Business Resale, Complex, UNE Groups—Monday through Friday 6:00PM until 8:00AM  
From 6:00 PM Friday until 8:00 AM Monday.~~

Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website:  
<http://www.interconnection.bellsouth.com/centers/html/lcsc.html> (1)

Local Interconnection Service Center (LISC) - Monday through Friday 4:30 P.M. until 8:00 A.M.  
From 4:30 P.M.Friday until 8:00 A.M. Monday. Weekends and holidays are excluded from the calculation. The exclusion of weekends begins at 12:01 AM Saturday until 12:00 midnight Sunday. Holidays are excluded from 12:01 AM until midnight (2)

The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

- LSRs which are identified and classified as "coin" (3)
- Scheduled OSS Maintenance

## Rationale:

(1) In KPMG's FL Exception 36, KPMG noted that the SQM hours of operation did not reflect the hours of the centers. The LCSC hours change based on customer needs and to reflect retail hours of operation.

(2) In KPMG's FL Exception 56, KPMG found that BellSouth's implemented metrics calculations for Reject Interval – Trunks was inconsistent with the documented calculations. BellSouth amended the exclusions to include a statement that is consistent with its currently implemented duration calculations. This exclusion was also added to O-9, Firm Order Confirmation Timeliness, and O-10 Service Inquiry with LSR Firm Order Confirmation ( FOC) Response Time Manual to provide consistency of exclusion language across similar measures.

(3) In response to KPMG's FL KPMG Exception 114, BellSouth noted that LRSs for coin services are not reported. BellSouth excludes these LSRs because they are for unregulated services.

<b>O-9:</b>	<b>Firm Order Confirmation Timeliness</b>
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**Change Proposed:**

BellSouth proposes to add the following note to the **Business Rules** for this measure:

Note: When multiple FOCs occur on a single LSR, the first FOC is used to measure the interval.

**Rationale:**

This issue was noted in KPMG's FL Exception 36. The sentence added to the definition clarifies which FOC issued is used to calculate the interval.

**Change Proposed:**

BellSouth proposes to make the following changes to the **Exclusions** for this measure: The following hours for Partially mechanized and Non-mechanized LSRs are excluded from the interval calculation:

~~Residence Resale Group—Monday through Saturday 7:00PM until 7:00AM  
From 7:00 PM Saturday until 7:00 AM Monday~~

~~Business Resale, Complex, UNE Groups—Monday through Friday 6:00PM until 8:00AM  
From 6:00 PM Friday until 8:00 AM Monday.~~

Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website:  
<http://www.interconnection.bellsouth.com/centers/html/lcsc.html> (1)

For ASRs processed in the Local Interconnection Service Center (LISC), all hours outside of Monday – Friday 8:00 – 4:30 CST, should be excluded. (2)

The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

- LSRs which are identified and classified as "coin" (3)
- Scheduled OSS Maintenance

**Rationale:**

(1) In KPMG's FL Exception 36, KPMG noted that the SQM hours of operation did not reflect the hours of the centers. The LCSC hours change based on customer needs and to reflect retail hours of operation.

(2) In KPMG's FL Exception 56, KPMG found that BellSouth's implemented metrics calculations for Reject Interval – Trunks was inconsistent with the documented calculations. BellSouth amended the exclusions to include a statement that is consistent with its currently implemented duration calculations. This exclusion was also added to O-9, Firm Order Confirmation Timeliness, and O-10 Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual to provide consistency of exclusion language across similar measures.

(3) In response to KPMG's FL KPMG Exception 114, BellSouth noted that LRSs for coin services are not reported. BellSouth excludes these LSRs because they are for unregulated services.

<b>O-10:</b>	<b>Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual</b>
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**Change Proposed:**

BellSouth proposes to add the following item to the **Exclusions** for this measure:

- [For ASRs processed in the Local Interconnection Service Center \(LISC\), all hours outside of Monday-Friday, 8:00-4:30 CST, should be excluded](#)
- ~~Weekend hours from 5:00 PM Friday until 8:00 AM Monday are excluded from the internal calculation of the Service Inquiry.~~
- Hours of exclusion for the CRSG can be found at the following website:  
[http://interconnection.bellsouth.com/centers/pdf/crsg\\_guidelines.pdf](http://interconnection.bellsouth.com/centers/pdf/crsg_guidelines.pdf)

**Rationale:**

- (1) In KPMG's FL Exception 56, KPMG found that BellSouth's implemented metrics calculations for Reject Interval – Trunks was inconsistent with the documented calculations. BellSouth amended the exclusions to include a statement that is consistent with its currently implemented duration calculations. This exclusion was also added to O-9, Firm Order Confirmation Timeliness, and O-10 Service Inquiry with LSR Firm Order Confirmation ( FOC) Response Time Manual to provide consistency of exclusion language across similar measures.
- (2) In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG suggested that because hours for the various centers can change, BellSouth should add a reference to the Exclusions showing the website where the hours of operation can be found.

**Change Proposed:**

BellSouth proposes to add the following clarifying language to the **Calculation** of this measure:

- Service Inquiry with LSR FOC Timeliness Interval (Manual) = (a – b)
- c = Sum of all Service Inquiry with LSR FOC Timeliness Intervals (Manual)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG recommended adding the above clarifying language to the Calculation section of this SQM report to differentiate this measure from measure O-9, FOC Timeliness.

<b>O-11:</b>	<b>Firm Order Confirmation and Reject Response Completeness</b>
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**Change Proposed:**

BellSouth proposes to add the following item to the **Exclusions** for this measure:

[Fatal Rejects](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG stated that since a Fatal Reject is not considered to be a valid LSR, "the Exclusions documentation should be updated to to reflect a 'Fatal Rejects' exclusion."



## Section 3: Provisioning

<b>P-1:</b>	<b>Mean Held Order Interval &amp; Distribution Intervals</b>
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### Change Proposed:

BellSouth proposes the following change to the **Exclusions** for this measure:

Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) Test Orders Types may be C, N, R, or T.

### Rationale:

During the third party audits in Georgia, KPMG issued Draft Exception 94.5, which involved the inability to replicate the reported results for this measure. BellSouth explained to KPMG that the exclusion for order activities associated with internal or administrative use of local services may include C, N, R or T order types. This clarification accounted for some of the discrepancies that KPMG identified. BellSouth, therefore, proposes to add this clarifying language to this exclusion. The above proposed language already appears in the Florida SQM, in which state a similar audit was also done by KPMG.

### Change Proposed:

BellSouth proposes the following changes to the **Calculation** for this measure:

Mean Held Order Interval = a / b

- a = Sum of held-over-days for all Past Due Orders Held for the reporting period with a BellSouth Missed Appointment from the earliest BST missed appointment
- b = Number of Past Due Orders Held and Pending But Not Completed and past the committed due date

### Rationale:

In the Georgia 3<sup>rd</sup> Party Test, KPMG noted in Exception #87, item 8, that BellSouth's computation methods prescribe the "held duration" as the difference between the report end date and the earliest commitment date for each service order. KPMG observed that this was inconsistent with the SQM Report calculation definition. This change clarifies the calculation.

### Change Proposed:

BellSouth proposes to add the following to the **Report Structure** for this measure:

- Geographic Scope
  - State
  - Region

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-3:</b>	<b>Percent Missed Installation Appointments</b>
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### Change Proposed:

BellSouth proposes the following change to the **Exclusions** for this measure:

Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test

Orders, etc.) [Test Orders Types may be C, N, R, or T.](#)

**Rationale:**

During the third party audits in Georgia, KPMG issued Draft Exception 94.5, which involved the inability to replicate the reported results for this measure. BellSouth explained to KPMG that the exclusion for order activities associated with internal or administrative use of local services may include C, N, R or T order types. This clarification accounted for some of the discrepancies that KPMG identified. BellSouth, therefore, proposes to add this clarifying language to this exclusion. The above proposed language already appears in the Florida SQM, in which state a similar audit was also done by KPMG.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-4:</b>	<b>Average Completion Interval (OCI) &amp; Order Completion Interval Distribution</b>
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**Change Proposed:**

BellSouth proposes the following change to the **Exclusions** for this measure:

Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) [Test Orders Types may be C, N, R, or T.](#)

**Rationale:**

During the third party audits in Georgia, KPMG issued Draft Exception 94.5, which involved the inability to replicate the reported results for this measure. BellSouth explained to KPMG that the exclusion for order activities associated with internal or administrative use of local services may include C, N, R or T order types. This clarification accounted for some of the discrepancies that KPMG identified. BellSouth, therefore, proposes to add this clarifying language to this exclusion. The above proposed language already appears in the Florida SQM, in which state a similar audit was also done by KPMG.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-5:</b>	<b>Average Completion Notice Interval</b>
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**Change Proposed:**

BellSouth proposes the following change to the **Exclusions** for this measure:

Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) Test Orders Types may be C, N, R, or T.

**Rationale:**

During the third party audits in Georgia, KPMG issued Draft Exception 94.5, which involved the inability to replicate the reported results for this measure. BellSouth explained to KPMG that the exclusion for order activities associated with internal or administrative use of local services may include C, N, R or T order types. This clarification accounted for some of the discrepancies that KPMG identified. BellSouth, therefore, proposes to add this clarifying language to this exclusion. The above proposed language already appears in the Florida SQM, in which state a similar audit was also done by KPMG.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- Geographic Scope
  - State
  - Region

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-6:</b>	<b>% Completions/Attempts without Notice or &lt;24 hours Notice</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- Geographic Scope
  - State
  - Region

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-7:</b>	<b>Coordinated Customer Conversions Interval</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Exclusions** for this measure:

- Test Orders

**Rationale:**

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure.

~~The interval breakout is 0-5 = 0-4.99, 5-15 = 5-14.99, >=15 = 15 and greater, plus Overall Average Interval~~

- The interval breakout is
  - 0 to <=5
  - >5 to <=15
  - >15
  - Average Interval
  
- Geographic Scope
  - State
  - Region

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the Report Structure of the SQM should be updated to reflect the changes associated with the Florida Third Party OSS Test specifying the correct interval breakout. KPMG also recommended that the Report Structure of the SQM be updated to reflect the geographic scope.

<b>P-7A:</b>	<b>Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Exclusions** for this measure:

- Test Orders

**Rationale:**

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- Geographic Scope
  - State
  - Region

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-7B:</b>	<b>Coordinated Customer Conversions – Average Recovery Time</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Exclusions** for this measure:

- [Test Orders](#)

**Rationale:**

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-7C:</b>	<b>Hot Cut Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Exclusions** for this measure:

- [Test Orders](#)

**Rationale:**

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-8:</b>	<b>Cooperative Acceptance Testing - % of xDSL Loops Successfully Tested</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Exclusions** for this measure:

- [Test Orders](#)

**Rationale:**

In KPMG's FL Observation 142, KPMG found that BellSouth was reporting some Test CLEC orders in December 2001 after a program change was implemented to exclude all test orders. BellSouth's proposed exclusion matches the Test Director programming change for the Coordinated Customer Conversions measurements.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>P-9:</b>	<b>% Provisioning Troubles within 30 days of Service Order Completion</b>
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**Change Proposed:**

BellSouth proposes the following change to the **Exclusions** for this measure:

Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) [Test Orders Types may be C, N, R, or T.](#)

**Rationale:**

During the third party audits in Georgia, KPMG issued Draft Exception 94.5, which involved the inability to replicate the reported results for this measure. BellSouth explained to KPMG that the exclusion for order activities associated with internal or administrative use of local services may include C, N, R or T order types. This clarification accounted for some of the discrepancies that KPMG identified. BellSouth, therefore, proposes to add this clarifying language to this exclusion. The above proposed language already appears in the Florida SQM, in which state a similar audit was also done by KPMG.

**Change Proposed:**

BellSouth proposes the following clarifying language to the **Calculation** for this measure:

a = Trouble reports on all completed orders [within](#) 30 days following service order(s) completion

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG recommended inserting the word "within" as part of the definition for "a" under the Calculation section for this measure as clarifying language.

**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- Geographic Scope
  - State
  - Region

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

## Section 4: Maintenance & Repair

<b>M&amp;R-1:</b>	<b>Missed Repair Appointments</b>
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### Change Proposed:

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic Scope.

<b>M&amp;R-2:</b>	<b>Customer Trouble Report Rate</b>
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### Change Proposed:

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>M&amp;R-3:</b>	<b>Maintenance Average Duration</b>
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### Change Proposed:

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>M&amp;R-4:</b>	<b>Percent Repeat Troubles within 30 Days</b>
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### Change Proposed:

BellSouth proposes the following changes to the **Report Structure** for this measure:



- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>M&amp;R-5:</b>	<b>Out of Service (OOS) &gt; 24 Hours</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Report Structure** for this measure:

- [Geographic Scope](#)
  - [State](#)
  - [Region](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>M&amp;R-6:</b>	<b>Average Answer Time – Repair Centers</b>
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**Change Proposed:**

BellSouth proposes the following changes to the **Exclusions** for this measure:

- ~~None~~
- [Calls that are abandoned by the CLEC Representative or BellSouth customer before the repair attendant answers the call](#)

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG recommended reflecting an exclusion for abandoned calls stating that “[s]ince the SQM is based on the total number of calls answered in the reporting period, abandoned calls cannot be included.”

<b>M&amp;R-7:</b>	<b>Mean Time To Notify CLEC of Network Outages</b>
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**Change Proposed:**

BellSouth proposes the following change to the **Definition** for this measure:

~~This report measures the time it takes for the BellSouth Network Management Center (NMC) to notify the CLEC of major outages.~~

[BellSouth will inform the CLEC and appropriate BellSouth personnel of any Network outages](#)

**Rationale:**

In FL Observation 133, KPMG noted that BellSouth’s SQM document for this measure contained inconsistencies with the benchmark as ordered by the FPSC. KPMG noted that the calculation formulas measured the total time and mean time to notify the CLEC of network outages

and that the definition and calculation suggested that only CLEC performance is measured. BellSouth proposed changes to the Definition, Business Rules, and Calculations to address the inconsistency. This change was also recommended in KPMG's Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002).

### Change Proposed:

BellSouth proposes to replace the existing **Business Rules** for this measure with the following statement:

This report measures the time it takes for BellSouth to notify the CLEC and appropriate BellSouth personnel of a customer impacting network incident in equipment that may be utilized by the CLEC. When BellSouth becomes aware of a network incident, the CLEC and appropriate BellSouth personnel will be notified electronically. The notification time for each outage will be measured in minutes and divided by the number of outages for the reporting period. The CLECs will be notified the same way and at the same time as BellSouth personnel. These are broadcast messages. It is up to those receiving the message to determine if they have customers affected by the incident.

### Rationale:

In FL Observation 133, KPMG noted that BellSouth's SQM document for this measure contained inconsistencies with the benchmark as ordered by the Kentucky PSC. KPMG noted that the calculation formulas measured the total time and mean time to notify the CLEC of network outages and that the definition and calculation suggested that only CLEC performance is measured. BellSouth proposed changes to the Definition, Business Rules, and Calculations to address the inconsistency. This change was also recommended in KPMG's Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002).

### Change Proposed:

BellSouth proposes the following change to the **Calculation** for this measure:

Time to Notify **CLEC** = (a - b)

- a = Date and Time BellSouth **NMC** Notified **both CLEC and BellSouth entities.**
- b = Date and time BellSouth **NMC** detected network incident

Mean Time to Notify **CLEC** = (c / d)

- c = Sum of all Times to Notify **both BST and CLEC**
- d = Count of **all** Network Incidents

### Rationale:

In FL Observation 133, KPMG noted that BellSouth's SQM document for this measure contained inconsistencies with the benchmark as ordered by the Kentucky PSC. KPMG noted that the calculation formulas measured the total time and mean time to notify the CLEC of network outages and that the definition and calculation suggested that only CLEC performance is measured. BellSouth proposed changes to the Definition, Business Rules, and Calculations to address the inconsistency. This change was also recommended in KPMG's Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002).

### Change Proposed:

BellSouth proposes the following change to the **Report Structure** for this measure:

- **Geographic Scope**
  - **State**
  - **Region**

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

### Change Proposed:

BellSouth proposes the following change to the **SQM Disaggregation – Analog/Benchmark** for this measure:

SQM Level of Disaggregation	Retail Analog / Benchmark
• BellSouth Aggregate.....	Parity <del>by Design</del> with Retail
• CLEC Aggregate.....	Parity <del>by Design</del> with Retail
• CLEC Specific.....	Parity <del>by Design</del> with Retail

**Rationale:**

This change is in response to KPMG Observation 161. The CLECs are being notified via email and BST receives faxed notification consequently the process is not “Parity by Design,” but “Parity with Retail.”

**B-2: Mean Time To Deliver Invoices**

**Change Proposed:**

BellSouth proposes the following change to the **Definition** for this measure:

Delete the current defintion and replace with the following language: “This report measures the mean interval for timeliness of billing invoices sent to CLECs in an agreed upon format. CRIS-based invoices are measured in business days, and CRIS-based invoices in calendar days.”

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG stated that the wording contained in the Business Rules section of this measure is more appropriate as wording for the Definition section, and that the wording contained in the Definition section is more appropriate for the Business Rules section. KPMG recommended that lanaguage in these two section be exchanged.

**Change Proposed:**

BellSouth proposes the following change to the **Business Rules** for this measure:

Delete the current Business Rules and replace with the following language:

Bill Distription is calculated as follows: CRIS BILLS – The number of workdays is reported for CRIS bills. This is calcaulted by counting the BILL Period date as the first work day. Weekends and holidays are excluded when counting workdays. J/N Bills are counted in the CRIS work day category for the purposes of the measurement since their billing account number (Q account) is provided from the CRIS system.

CABS BILLS – The number of calendar days is reported for CABS bills. This is calcaulted by counting the day following the Bill Period date as the first calendar day. Weekends and Holidays are included when counting the calendar days.

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG stated that the wording contained in the Business Rules section of this measure is more appropriate as wording for the Definition section, and that the wording contained in the Definition section is more appropriate for the Business Rules section. KPMG recommended that lanaguage in these two section be exchanged.

## Section 7: Database Update Information

<b>D-2:</b>	<b>Percent Database Update Accuracy</b>
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### Change Proposed:

BellSouth proposes the following change to the **Definition** for this measure:

This report measures the accuracy of database updates by BellSouth for Line Information Database (LIDB) Directory Assistance and Directory Listings using a statistically valid sample of ~~LSRs/Orders~~ completed CLEC Service Orders in a manual review. This manual review is not conducted on BellSouth ~~Retail~~ Service Orders.

### Rationale:

KPMG noted in KPMG FL Observation 180 that BellSouth uses a statistically valid sample of completed CLEC Service Orders rather than a sample of original CLEC orders. BellSouth has updated the SQM language for both the Definition and Business Rules to clarify that it uses a statistically valid sample of completed CLEC Service Orders for this measure.

### Change Proposed:

BellSouth proposes the following change to the **Business Rules** for this measure:

For each update ~~completed~~ reviewed during the reporting period, the original update that the CLEC sent to BellSouth is compared to the database following completion of the update by BellSouth. An update is “completed without error” if the database completely and accurately reflects the activity specified on the original and supplemental update (e.g., orders) submitted by the CLEC. Each database (e.g., LIDB, Directory Assistance and Directory Listings) should be separately tracked and reported.

A statistically valid sample of completed CLEC Service Orders ~~will be is~~ pulled each month. ~~The sample will be used to test the accuracy of the database update process. This is a manual process.~~

### Rationale:

KPMG noted in KPMG FL Observation 180 that BellSouth uses a statistically valid sample of completed CLEC Service Orders rather than a sample of original CLEC orders. BellSouth has updated the SQM language for both the Definition and Business Rules to clarify that it uses a statistically valid sample of completed CLEC Service Orders for this measure. The proposed language was also recommended in KPMG’s Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002).

### Change Proposed:

BellSouth proposes the following change to the **Report Structure** for this measure:

- Geographic Scope
  - ~~State~~
  - Region

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>D-3:</b>	<b>Percent NXXs and LRNs Loaded by the LERG Effective Date</b>
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**Change Proposed:**

BellSouth proposes the following change to the **Definition** for this measure:

Measurement of the percent of NXX(s) and Location Routing Numbers LRN(s) loaded in end office and/or tandem switches by the Local Exchange Routing Guide (LERG) effective date when facilities are in place. BellSouth has a single provisioning process for both NXX(s) and LRN(s). In this measure, BellSouth will identify whether or not a particular NXX has been flagged as LNP capable (set triggers for dips) by the LERG effective date.

~~An LRN is assigned by the owner of the switch and is placed into the software translations for every switch to be used as an administrative pointer to route NXX(s) in LNP capable switches. The LRN is a result of Local Number Porting and is housed in a national database provided by the Number Portability Administration Center (NPAC). The switch owner is responsible for notifying NPAC and requesting the effective date that will be reflected in the LERG. The national database downloads routing tables into BellSouth Service Control Point (SCP) regional databases, which are queried by switches when routing ported numbers.~~

~~The basic NXX routing process includes the addition of all NXX(s) in the response translations. This addition to response translations is what supports LRN routing. Routing instructions for all NXX(s), including LRN(s), are received from the Advance Routing & Trunking System (ARTS) and all routing, including response, is established based on the information contained in the Translation Work Instructions (TWINs) document.~~

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG stated that second and third paragraphs of the Definition section for this measure are more appropriate as part of the Business Rules section. BellSouth agrees and proposes to move the noted paragraphs from the Definition section to the Business Rules section as highlighted above.

**Change Proposed:**

BellSouth proposes the following change to the **Business Rules** for this measure:

An LRN is assigned by the owner of the switch and is placed into the software translations for every switch to be used as an administrative pointer to route NXX(s) in LNP capable switches. The LRN is a result of Local Number Porting and is housed in a national database provided by the Number Portability Administration Center (NPAC). The switch owner is responsible for notifying NPAC and requesting the effective date that will be reflected in the LERG. The national database downloads routing tables into BellSouth Service Control Point (SCP) regional databases, which are queried by switches when routing ported numbers.

The basic NXX routing process includes the addition of all NXX(s) in the response translations. This addition to response translations is what supports LRN routing. Routing instructions for all NXX(s), including LRN(s), are received from the Advance Routing & Trunking System (ARTS) and all routing, including response, is established based on the information contained in the Translation Work Instructions (TWINs) document.

Data for the initial NXX(s) and LRN(s) in a local calling area will be based on the LERG effective date or completion of the initial interconnection trunk group(s), whichever is longer. Data for additional NXX(s) in the local calling area will be based on the LERG effective date. The LERG effective date is loaded into the system at the request of the CLEC. It is contingent upon the CLEC to engineer, order, and install interconnection arrangements and facilities prior to that date.

The total Count of NXX(s) and LRN(s) that were scheduled to be loaded and those that were loaded by the LERG effective date in BellSouth switches will be captured in the Work Force Administration -Dispatch In database.

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG stated that second and third paragraphs of the Definition section for this measure are more appropriate as part of the Business Rules section. BellSouth agrees and proposes to move the noted paragraphs from the Definition section to the Business Rules section as highlighted above.

**Change Proposed:**

BellSouth proposes the following change to the **Report Structure** for this measure:

- Geographic Scope
  - ~~State~~
  - Region

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

## Section 10: Collocation

<b>C-1:</b>	<b>Collocation Average Response Time</b>
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### Change Proposed:

BellSouth proposes the following change to the **Defintion** for this measure:

Measures the average time (counted in calendar days) from the receipt of a complete and accurate collocation application (including receipt of application fee if required) to the date BellSouth returns a response electronically or in writing. Within ~~40~~ the number of calendar days as designated by the Collocation Order after having received a bona fide application for physical collocation, BellSouth must respond ~~as to whether space is available or not~~ with space availability and a price quote.

### Rationale:

This change is required because the C-1 definition does not accurately describe the interval being measured. The error was discussed while providing a KPMG audit response on a conference call with KPMG on 3/15/02.

### Change Proposed:

BellSouth proposes the following change to the **Report Structure** for this measure:

- Geographic Scope
  - ~~State~~
  - Region

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>C-2:</b>	<b>Collocation Average Arrangement Time</b>
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### Change Proposed:

BellSouth proposes the following change to the **Report Structure** for this measure:

- Geographic Scope
  - ~~State~~
  - Region

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.

<b>C-3:</b>	<b>Collocation Percent of Due Dates Missed</b>
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### Change Proposed:

BellSouth proposes the following change to the **Business Rules** for this measure:

Percent Due Dates Missed is the percent of total collocation arrangements which BellSouth is unable to complete by the end of the BellSouth committed due date. ~~The clock starts on the date that BellSouth receives a complete and accurate Bona Fide firm order~~

~~accompanied by the appropriate fee if required.~~ The arrangement is considered a missed due date if it is not completed on or before the committed due date.

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG stated that “[s]ince the C-3 SQM measures the percentage of due dates missed, no time intervals are required for the percentage calculation.” KPMG therefore recommended deletion of the sentence noted in the proposed change above.

**Change Proposed:**

BellSouth proposes the following change to the **Calculation** for this measure:

a = Number of Completed Orders that were not completed ~~within~~**by** BellSouth Committed Due Date during the Reporting Period.

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG recommended that the word “within” should be changed “by” for clarity.

**Change Proposed:**

BellSouth proposes the following change to the **Report Structure** for this measure:

- Geographic Scope
  - ~~State~~
  - Region

**Rationale:**

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that the SQM is not specific as to the Report Structure for this measure. KPMG recommended that, for clarification, the Report Structure documentation be updated to reflect the geographic scope.



## Section 11: Change Management

CM-1:	<b>Timeliness of Change Management Notices</b>
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### Change Proposed:

BellSouth proposes the following change to the **Exclusions** for this measure:

- Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes. For example: a patch to fix a software problem.
- ~~Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP)~~
- [Type 2 Change Requests – Regulatory Changes](#)
- [Type 6 Change Requests – CLEC Impacting Defects](#)
- [Expedited Features](#)

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that second does not accurately reflect the classification of Type 6 Change Requests, since Type 6 Change Requests include only CLEC Impacting Defects. Further, KPMG noted that “[d]efects and expedited features, by definition, fall outside of the usual timeframes established by the CCP and should be excluded.” BellSouth therefore proposes KPMG’s recommended changes as reflected above.

CM-2:	<b>Change Management Notice Average Delay Days</b>
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### Change Proposed:

BellSouth proposes the following change to the **Exclusions** for this measure:

- Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes. For example: a patch to fix a software problem.
- ~~Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP)~~
- [Type 2 Change Requests – Regulatory Changes](#)
- [Type 6 Change Requests – CLEC Impacting Defects](#)
- [Expedited Features](#)

### Rationale:

In its Florida PSC BellSouth Permanent Metrics Adequacy Study (September 2002), KPMG indicated that second does not accurately reflect the classification of Type 6 Change Requests, since Type 6 Change Requests include only CLEC Impacting Defects. Further, KPMG noted that “[d]efects and expedited features, by definition, fall outside of the usual timeframes established by the CCP and should be excluded.” BellSouth therefore proposes KPMG’s recommended changes as reflected above.

### Change Proposed:

BellSouth proposes the following change to the **Business Rules** for this measure:

This metric is designed to ~~compute measure~~ the [average delay days for percent of](#) change management notices sent to the CLECs [outside the according to notification standards and](#) time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

**Rationale:**

In KPMG's FL Observation 69 KPMG noted that the formula specified in the SQM document for the measure was inconsistent with the benchmarks ordered by the FPSC. BellSouth proposed the changes to the Business Rules to clarify the calculations as reported.

<b>CM-4:</b>	<b>Change Management Documentation Average Delay Days</b>
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**Change Proposed:**

BellSouth proposes the following change to the **Business Rules** for this measure:

This metric is designed to compute the average delay days for ~~measure the percent of requirements or~~ business rule documentation sent to the CLECs outside the ~~according to documentation standards and~~ time frames set forth in the Change Control Process. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth Local Interfaces.

**Rationale:**

In KPMG's FL Observation 69, KPMG noted that the formula specified in the SQM document for the measure was inconsistent with the benchmarks ordered by the FPSC. BellSouth proposed the changes to the Business Rules to clarify the calculations as reported.

<b>CM-5:</b>	<b>Notification of CLEC Interface Outages</b>
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**Change Proposed:**

BellSouth proposes the following change to the **Business Rules** for this measure:

~~This measure is designed to notify the CLEC of interface outages within 15 minutes of BellSouth's verification that an outage has taken place. This metric will be expressed as a percentage.~~

This metric measures the process of notifying CLECs of an interface outage as defined by the Change Control Process Documentation. BellSouth has 15 minutes to notify the CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur:

1. BellSouth can duplicate a CLEC reported error.
2. BellSouth finds an error message within the system error log that identifiably matches a CLEC reported outage.
3. When 3 or more CLECs report the identical type of outage.
4. BellSouth detects a problem due to the loss of functionality for users of a system.

Note: The 15 minute clock begins once a CLEC reported or a BellSouth detected outage has lasted for 20 minutes and has been verified. If the outage is not verified within 20 minutes, the clock begins at the point of verification.

This metric will be expressed as a percentage.

**Rationale:**

In KPMG's FL Exception # 81 KPMG noted that BellSouth's stated Business Rules were ambiguous. Initially, BellSouth made changes to the Business Rules to clarify the definition of an outage as requested by KPMG Exception # 81. Since the closure of FL Exception # 81, BellSouth has rewritten the Business Rules to provide additional clarification of the outage verification process.