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COMMISSION CLERK

September 3, 2009

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

> **Re:** **Docket No. 000121A-TP**
> **In Re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange Telecommunications companies (BellSouth Track)**

Dear Ms. Cole:

Enclosed is an original and six copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to CompSouth's Proposed Revisions to the BellSouth Performance Assessment Plan, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

E. Earl Edenfield, Jr.

COM ___
ECR ___
GCL _2_
OPC ___
RCP _4_
SSC ___
SGA ___
ADM ___
CLK ___

Enclosures

cc: All parties of record
    Jerry D. Hendrix
    Gregory R. Follensbee

DOCUMENT NUMBER-DATE

09218 SEP-3 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail the 3rd day of September, 2009 to the following:

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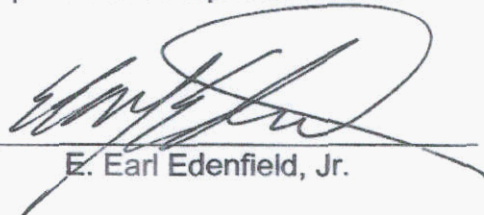Suite 1200
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E. Earl Edenfield, Jr.

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment)   Docket No.: 000121A-TP
of operations support systems)
permanent performance measures for)
incumbent local exchange)
telecommunications companies._____)   Filed: September 3, 2009

AT&T FLORIDA'S RESPONSE TO COMPSOUTH'S PROPOSED REVISIONS TO THE BELLSOUTH PERFORMANCE ASSESSMENT PLAN

Pursuant to the Amended Notice issued by the Florida Public Service Commission Staff ("Commission Staff"), BellSouth Telecommunications, Inc., d/b/a AT&T Florida ("AT&T Florida") hereby submits its responsive comments to CompSouth's proposed revisions to the AT&T Florida Service Quality Measurement Plan, Version 5.01, ("SQM" or "SQM plan") dated April 19, 2008 and Self-Effectuating Enforcement Mechanism Administrative Plan, Version 5.02, ("SEEM" or "SEEM plan") dated December 15, 2008. AT&T Florida's responses to CompSouth's specific proposed changes are attached hereto as Attachment 1.[1]

As AT&T Florida previously noted in its initial comments, AT&T Florida's obligation is to provide competitive local exchange carriers ("CLECs") with nondiscriminatory access to Operations Support Systems ("OSS"). CompSouth has not described or shown how its proposed changes are consistent with AT&T Florida's obligation. Instead, CompSouth's proposals seem designed to make what should be a normal "business to business" relationship more detailed, complex and even more excessively punitive. CompSouth's proposals are "self-protectionist" and appear calculated to lead to more and greater regulatory involvement in business to business

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[1] CompSouth did not provide any rationale for its proposed redlined changes other than its general presentation provided July 29, 2009. AT&T Florida's responses to CompSouth's redlined changes are based on assumed or intuited rationale of CompSouth.

activities at a time when the telecommunications market place is irreversibly open to competition and the industry is evolving away from a pervasive regulatory model.

CompSouth argues that any review of the SQM or SEEM plan wait until next year after certain impending 22-state OSS changes are made. OSS changes and updates are a normal and continuous process. To wait until all changes are made would mean that a review would never happen. It has been over 2 years since the last review. It is past time to review the SQM and SEEM plans.

CompSouth argues that SEEM remedy plans must be directly subject to regulatory oversight and control and can not be in a commercial agreement outside the Commission's direct review and approval. Contrary to CompSouth's position, a remedy plan can be and should be placed in commercial business to business agreements.[2] AT&T regularly enters into commercial agreements including remedy plans in its 22-state territory, which includes the Southeast states. Many of these agreements are not subject to regulatory oversight or approval. Such remedy plans are and should be negotiated between the parties and need not be included in Sections 251/252 interconnection agreements subject to regulatory approval and oversight. For example, AT&T Florida has commercial agreements with numerous CLECs to provide its UNE-P replacement product. Some of those agreements provide for remedy payments. These agreements are not subject to the regulatory approval or oversight. Even in those instances in the Midwest and West regions where remedies were voluntarily placed in interconnection agreements it was done in conjunction with the elimination of Tier 2 remedies. The bulk of the interaction between AT&T and its CLEC customers is not required by Section 251 and is

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[2] CompSouth's reliance on Coserv to support the notion that any matter that touches on a §251 element must be in a Section 251/252 agreement is misplaced. Coserv expressly held that "only issues voluntarily negotiated pursuant to §252(a) are subject to the compulsory arbitration provision." (emphasis added) 350 F.3d 482, 484 (5th Cir.2003). The SEEM plan at issue here has not been subject to voluntary negotiation in conjunction with Section 251/252 arbitration and, therefore, does not fall within the ambit of a Section 251/252 ICA which is subject to regulatory approval and oversight.

increasingly moving to negotiated commercial agreements. It is time that remedy plans in Florida move in the same direction as the rest of the nation.

In particular, it is now appropriate to eliminate Tier 2 remedies from the SEEM plan. Tier 2 remedies are no longer needed as an added incentive to open the market or to prevent backsliding. Any suggestion that competition is still in the nascent stage or that the state of competition is too fragile to lessen the reigns of regulatory oversight is belied by the CLECs themselves. According to a CompSouth featured article the "initial generation of facilities-based CLECs smashed the last remnants of the thought that the telecommunications market could be insulated from competition's grasp." [3] As noted in the article, three of CompSouth's members generate in excess of $1 billion in annual revenues. Several more of CompSouth's regional members generate in excess of $100 million in annual revenues. The CompSouth article makes clear that the market is irreversibly open to competition.
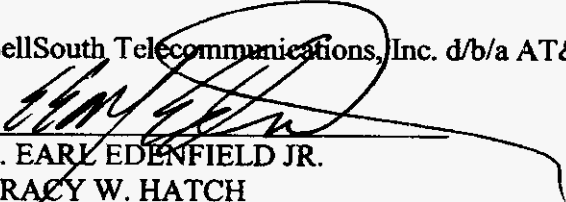
More importantly, Tier 2 remedies can no longer be justified as a matter of law. As noted in AT&T's initial comments, AT&T Florida is the only ILEC in Florida subject to remedy payments, particularly a plan that requires Tier 2 remedies paid to the state. To the extent there was ever any justification to single out AT&T Florida for punitive treatment under Tier 2 remedies, such discrimination is no longer appropriate. While both Verizon and Embarq have performance measurement plans that are roughly the same as AT&T Florida's SQM plan, neither Verizon or Embarq are subject to remedies as AT&T Florida is under its SEEM plan. There is nothing unique about AT&T Florida's OSS activities that justify applying automatic Tier 2 penalty payments. The only thing unique to AT&T Florida is Section 271 obligations. Assuming, *arguendo*, that Tier 2 penalty payments are an adjunct mechanism to incent or

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[3] CompSouth Featured Article, Analysts: Facilities-Based CLECs on the Upswing. (http://www.compsouth.net/xchange_article_070809.html)

enforce Section 271 obligations, which they are not, the FCC has made it clear that Section 271 enforcement is not within the jurisdiction of the state regulatory agencies. There is nothing unique to AT&T Florida pursuant to Sections 251 or 252 either in duties or in performance that justifies singling out AT&T Florida for discriminatory imposition of Tier 2 penalty payments. The time has come to end the discriminatory treatment and eliminate Tier 2 payments.

Respectfully submitted, this 3rd day of September, 2009.

BellSouth Telecommunications, Inc. d/b/a AT&T Florida

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 1: Operations Support Systems (OSS)	
OSS-1 [ARI]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)	
Exclusions • Syntactically Incorrect queries • Scheduled OSS Maintenance • Test Transactions/Records ~~BellSouth may exclude transactions submitted by an individual CLEC that are an unanticipated significant increase in the monthly volume of transactions submitted by that individual CLEC. This exclusion will only be applied when the individual CLEC's transactions are directly attributable to a failure of the SQM measure. An unanticipated, significant increase in CLEC volume is indicated by either a 100% increase over the individual CLEC's forecasted volumes or over the average of the normalized volumes for the most recent prior six months. BellSouth will notify the individual CLEC whose transactions caused this exclusion to be invoked, and will provide general notification to CLECs that such transactions were excluded.~~	AT&T disagrees with striking the exclusion regarding an individual CLEC's unanticipated significant increase in monthly volume. This exclusion is for the benefit and protection of the industry to ensure an individual CLEC's actions do not disrupt the OSS response interval. AT&T designs the capacity of its OSS based on historical and forecasted volumes. A significant increase in volume submitted by an individual CLEC -- especially over a short time interval -- may disrupt the activities of other CLECs and possibly that of AT&T's Retail organization. For this exclusion to apply, the individual CLEC's transactions must a) be a 100% increase over either their forecasted volume or over the average of the normalized volumes for the prior six months, and b) be directly attributable to the failure of the metric. When this occurs, AT&T will provide notice to the CLEC and the industry.
Business Rules The following systems are observed in the Pre-Ordering/Ordering OSS Response Interval measurement: RSAG-Address, RSAG-TN, ATLAS, COFFI, DSAP, <u>LASR, Verigate</u> and CRIS. The following systems are observed in the Maintenance and Repair OSS Response Interval measurement: CRIS, DLETH, DLR, LMOS, LMOSupd, LNP Gateway, MARCH, OSPCM, Predictor, SOCS, and NIW.	AT&T disagrees with the addition of Verigate to the legacy systems recognized in this measure. Verigate is an interface much like LENS and TAG and is identified as such in Appendix C of the SQM Plan. On June 9, 2008, AT&T filed Version 5.01 of the SQM Plan with the Florida PSC that reflected administrative OSS changes implemented on April 19, 2008 which included the addition to Appendix C of Verigate for

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	the OSS-1 metric and both Verigate and LASR for the OSS-2 metric.
	AT&T also disagrees with the addition of LASR to this measure because it is not a legacy system like RSAG and MARCH that are listed in Appendix C of the SQM Plan.
Comment: Propose Disaggregation into 3 separate elements: preordering, ordering, and maintenance.	AT&T disagrees with adding the Ordering disaggregation to the OSS-1 measure. Pre-Ordering transactions, which are reported in this measure, are a subset of the ordering process. There is no difference with respect to the OSS response interval for when a CLEC is operating in a Pre-Order or Firm-Order mode via a front-end interface provided by AT&T. The difference between Pre-Order and Firm-Order is that the responses in the Pre-Ordering process do not formulate an LSR that is delivered to AT&T. Instead, the functions of the Pre-Ordering process gather the pieces of information by accessing legacy systems required to build and deliver an LSR to AT&T. Thus, the Pre-Ordering functions are those that receive various responses from the AT&T legacy systems.
Comment: Should other interfaces as shown in AT&T diagram, i.e. BOG, SGG,LESOG,LNP,DDC, PRE be included in this measure?	AT&T disagrees that this measure should be structured on a system-by-system architectural flow basis. Rather, this measure should provide intervals from a front-end interface (TAG/XML, LENS, etc.) to a back-end legacy system accessed to obtain information needed for the submission of an LSR or a trouble ticket. This measure should not be and is not designed to measure the time it takes for a transaction to go through every application in the path of a service order creation and the

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	subsequent response back to the CLEC. The purpose of this metric is to measure the response interval from input made via a front-end interface from the data accessed and retrieved from a legacy system in order that the function of pre-order, order, or maintenance and repair can be performed. Noted below are the various additional reasons each system should not be included. **BOG** (Bulk Order Generator) is tentatively scheduled to be retired in July 2010. **SGG** (Service Gate Gateway) is a gateway/router and has the Due Date Calculator (DDC) and PRE components residing in the application. The interval of time needed for such requests as Due Date inquiry are included in the measure since DDC resides in the application. **PRE** (Programmable Rules Engine) handles super fatal rejects. These rejects are caused by incomplete or incorrect information that is provided on the LSR. **LESOG** (Local Exchange Service Order Generator) is a service order generator which is not a front end interface. The purpose of LESOG is to generate a service order that SOCS can accept for provisioning. **LNP Gateway** (Local Number Portability Gateway) is a system designed to generate LNP service orders that SOCS can accept for provisioning and issue subsequent responses back to the CLEC. Subsequent responses include FOCs, Rejects, and Jeopardy notices – all of which have interval measures to evaluate that performance.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

SEEM Measure
 	
  SEEM   Tier I   Tier II
 	
  Yes ....X X
 	
Comment: Given the new 22 state architecture it is important to be able to clearly see each area of the OSS on a by system basis. LASR continues to introduce defects which delay or require workarounds and needs to be carefully examined]
	AT&T opposes the addition of Tier-1 remedies. This metric performance is calculated using regional data and there is no current equitable means for reporting results at an individual CLEC level. It is AT&T's position that Tier-2 remedies should be eliminated for this metric. A consistent level of performance has been demonstrated that provides an efficient CLEC with a meaningful opportunity to compete.
	
	The purpose of this measure is to provide intervals from a given interface (such as TAG/XML and LENS) to a legacy back-end system to obtain information needed for the submission of an LSR to AT&T. Interfaces and associated legacy systems are identified in Appendix C of the SQM Plan.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)
 	
SEEM Measure
 	
   SEEM   Tier 1   Tier II
     Yes...............X...............X
	AT&T opposes the addition of Tier-1 remedies. This metric captures the functional availability of applications/interfaces as a percentage of schedule availability for all CLECs. There is no current equitable means for reporting results at an individual CLEC level. It is AT&T's position that Tier-2 remedies should be eliminated for this metric. A consistent level of performance has been demonstrated that provides an efficient CLEC with a meaningful opportunity to compete.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 2: Ordering	
O-2 [AKC]: Acknowledgement Message Completeness **Definitions:** This measure provides the percent of transmissions/LSRs received via ordering interface gateways or e-mail, which are acknowledged electronically. **Exclusions:** Manually Submitted LSRs	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T opposes the proposed addition of e-mailed LSRs to the definition for this measurement. The purpose of this metric is to measure the percent of acknowledgement messages returned for LSRs which are submitted via the electronic ordering interfaces provided by AT&T. E-mailed LSRs replaced the faxed or courier method by which CLECs manually submitted paper copies of LSRs. E-mail delivery of a LSR is not comparable to an electronic ordering interface such as EDI and LENS that AT&T designed as mechanized ordering interfaces whereby CLEC inputs and receipts can electronically be acknowledged. E-mail is a public access system not governed or controlled by the CLECs or AT&T.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
O-3 [FT]: Percent Flow-Through Service Requests **Business Rules:** ~~The CLEC mechanized ordering process does not include LSRs which are submitted manually (for example: fax and courier) or are not designed to flow through (for example: Planned Manual Fallout).~~	AT&T opposes the removal from the Business Rules the verbiage that "CLEC ordering process does not include LSRs which are submitted manually." The basic definition of flow-through is the percentage of LSRs that are submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued without manual intervention. The CLEC mechanized ordering process embodies the set of mechanized ordering interfaces provided by AT&T to CLECs. The proposed change would result in the inclusion of manually submitted LSRs as well as transactions that are submitted electronically but are designed to fall out (Planned Manual Fallout).
SQM Disaggregation - Analog/Benchmark SQM/SEEM Analog/Benchmark Residence ....Benchmark: 95~~98~~% Business.......Benchmark: 90~~95~~% UNE-L (includes UNE-L with LNP)..............Benchmark: 90~~85~~% LNP..............Benchmark: 95~~98~~%	AT&T disagrees with the proposed arbitrary tightening of established flow-through benchmarks. The current benchmarks were established as an acceptable level of performance to allow an efficient CLEC a meaningful opportunity to compete and nothing has changed that should require a higher performance standard to be established. AT&T's position is the benchmark should be established to emphasize an overall flow-through impact based on a CLEC's order mix.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
O-8 [RI]: Reject Interval **Exclusions** • LSRs identified as "Projects" with the exception of valid "Project IDs" for Bulk Migration (except those associated with a M&A transaction)	AT&T disagrees with the inclusion of Merger & Acquisition (M&A) transactions in this measure. The measure is designed to calculate the reject interval for transactions submitted during the course of normal business operations utilizing established common ordering processes and intervals to provide quality end user service. M&A activity is not a normal course-of-business process. LSRs submitted for M&A activity require project coordination due to the requirement to transition large volumes of end users in a specified interval. Due to the coordination requirements, M&A transactions are qualified projects and should be excluded from this measure.
Business Rules **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until the LSR is rejected (date and time stamp of reject in ordering interface gateways). Auto Clarifications are considered in the Fully Mechanized category. A1 - The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations.Why is ASR not included in) these business rules?	ASRs are referenced in the Business Rules as associated only with the Local Interconnection Trunks. The second paragraph of the Business Rules defines rules common to both LSR/ASR. Considering this, for a more specific response, CompSouth will need to provide specifics for what they are asking in the Business Rules content.
~~**Non-Mechanized:** The elapsed time from receipt of a valid LSR not submitted via electronic ordering systems (date and time stamp of FAX or date and time paper LSRs are received in the LCSC) until notice of the reject (clarification) is returned~~	AT&T agrees with the proposal to eliminate non-mechanized orders from this metric. However, AT&T does not agree to move to another reporting category orders currently classified and reported as "non-mechanized".

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Comment [A1]: The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations.Why is ASR not included in these business rules?

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
to the CLEC via FAX Server. **Report Structure** ~~Non-Mechanized:~~ ~~0 - <= 18 business hours~~ **SQM Disaggregation - Analog/Benchmark** ~~Non-Mechanized....95% <= 18 Business Hours~~ • Local Interconnection Trunks..90% <= 4 2 Business Days	AT&T disagrees with CompSouth proposal to arbitrarily change the benchmark from <=4 Business Days to <=2 Business Days. Resource additions and procedural changes to reduce the current benchmark would be unduly burdensome to AT&T for this low volume (125 total for 12-month period) sub-metric. The current benchmark was established as an acceptable level of performance to allow an efficient CLEC a meaningful opportunity to compete and nothing has changed that should require the higher performance standard to be established.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
O-9 [FOCT]: Firm Order Confirmation Timeliness **Exclusions** LSRs identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations and M&A	AT&T disagrees with the inclusion of Merger &Acquisition (M&A) transactions in this measure. The measure is designed to calculate the response timeliness for a Firm Order Confirmation (FOC) submitted during the course of normal business operations utilizing established common ordering processes and intervals to provide quality end user service. M&A activity is not a normal course-of-business process. LSRs submitted for M&A activity require project coordination due to the requirement to transition large volumes of end users in a specified interval. Due to the coordination requirements, these transactions are qualified projects and should be excluded from this measure.
Business Rules Fully Mechanized: [A2]The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?	ASRs are referenced in the Business Rules as associated only with the Local Interconnection Trunks. The second paragraph of the Business Rules defines rules common to both LSR/ASR. Considering this, for a more specific response, CompSouth will need to provide specifics for what they are asking in the Business Rules content.
Report Structure: ~~Non-mechanized:~~	AT&T agrees with the proposal to eliminate non-mechanized orders from this metric. However, AT&T does not agree to

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Comment [A2]: The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations. Why is ASR not included in these business rules?

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
~~0 <= 24 business hours~~ **SQM Disaggregation - Analog/Benchmark** ~~Non-Mechanized: 95% <= 24 business hours~~	move to another reporting category orders currently classified and reported as "non-mechanized". .

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
O-11 [FOCC]: Firm Order Confirmation and Reject Response Completeness	
Exclusions LSRs identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations and M&A	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T disagrees with the inclusion of Merger & Acquisition (M&A) transactions in this measure. The measure is designed to calculate the percentage of FOCs and Rejects sent to the CLEC from ordering interfaces in response to electronically submitted LSRs during the course of normal business operations. M&A activity is not a normal course-of-business process. LSRs submitted for M&A activity require project coordination due to the requirement to transition large volumes of end users in a specified interval. Due to the coordination requirements, these transactions are qualified projects and should be excluded from this measure.
Business Rules **Fully Mechanized** The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations.Why is ASR not included in these business rules?	ASRs are referenced in the Business Rules as associated only with the Local Interconnection Trunks. The second paragraph of the Business Rules defines rules common to both LSR/ASR. Considering this, for a more specific response, CompSouth will need to provide specifics for what they are asking in the Business Rules content.
~~Non-Mechanized: The number of FOCs or Rejects sent to the CLECs via FAX server in response to manually submitted LSRs/ASRs (date and time stamp in FAX Server).~~	AT&T agrees with the proposal to eliminate non-mechanized orders from this metric. However, AT&T does not agree to move to another reporting category orders currently classified

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Comment [A3]: The definition includes LSR and ASR. But the Business Rules list only LNP for mechanized categories and Bulk Migrations.Why is ASR not included in these business rules?

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

Report Structure
One report with the following four Disaggregation Levels:
    Fully Mechanized
    Partially Mechanized
    ~~Non-Mechanized~~
    Local Interconnection Trunks
 	
SQM Disaggregation - Analog/Benchmark
~~Non-Mechanized.....95% Returned~~
	and reported as "non-mechanized".

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

O-12 [OAAT]: Average Answer Time - Ordering Centers
 	
Report Structure
- CLEC Aggregate
- BellSouth Aggregate
  - Business Service Center
  - Consurmer Service Center
- Geographic Scope
- Region
 	
SQM Disaggregation - Analog/Benchmark
CLEC Local Carrier Service Center...............Parity with Retail (Business Service Center _& Consumer Service center_))
 	
SEEM Measure
   SEEM   Tier I   Tier II
    Yes .... X X
	AT&T proposes the restructuring of this metric to a benchmark performance standard of an Average Answer Time $\leq$ 30 seconds. However, if agreement cannot be reached on a benchmark standard, AT&T remains open to the CLEC proposal to add Retail Consumer Service Center to the parity comparison for this measure.
	
	AT&T disagrees with the addition of Tier-1 remedies to this measure. Performance results are based on regional data and there is no technically feasible means to tally individual CLEC results for the calls answered in the regional service center and determine the time in queue for each of the individual CLEC's calls. Therefore, there is no equitable means to correlate performance results with CLEC Tier-1 remedies.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 3: Provisioning	
P-1 [HOI]: Held Order Interval Comment: Compsouth requests a diagnostic measure that indicates the number of orders PF due to copper not being available. This could be accomplished as a subset of this measure or new measure	AT&T opposes the suggestion to add a diagnostic measure to identify facility misses due to unavailability of copper. There is no existing coding method available to identify the type of facility used on individual circuits. The volume for the P-1 metric in the Florida CLEC community as a whole barely exceeds 10 orders monthly for any given product. Therefore, it is unreasonable to expect AT&T to incur the cost to develop code for this proposed diagnostic measure.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
P-2A [PJ48]: Percentage of Orders Given Jeopardy Notices >= 48 Hours	
Exclusions ~~Orders jeopardized on the due date. This exclusion only applies when the technician on premises has attempted to provide service but must refer to Engineer or Cable Repair for facility jeopardy.~~	AT&T opposes the proposed elimination of this exclusion. This measure is intended to provide notice "in advance" of an installation in jeopardy. Once a technician is dispatched for an installation on the due date, unforeseen facility problems can prevent completion. Therefore, an advanced jeopardy notification is not possible in these instances and should be excluded.
SEEM Measure SEEM Tier I Tier II ~~No~~<u>Yes</u> .... <u>X</u>	AT&T opposes the proposal to add Tier-1 remedies to this measure. A metric to track Jeopardy Notifications is not reflective of the installation quality which is captured and remedied in metric P-3 (MIA) Percent Missed Installation Appointments.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
P-2B [PJ]: Percentage of Orders Given Jeopardy Notices **Exclusions** ~~Orders issued with a due date of less than or equal to 48 hours~~	AT&T agrees to the proposal to eliminate the exclusion pertaining to orders with a due date of less than or equal to 48 hours.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
P-3 [MIA]: Percent Missed Installation Appointments **Exclusions** ~~Orders canceled prior to the due date including orders that are to be provisioned on the same day they are placed. ("Zero Due Date Orders")~~	AT&T opposes the elimination of this exclusion. Orders that are cancelled are no longer eligible for an installation and should be excluded from this installation quality metric. AT&T proposes the following exclusion verbiage modification for clarification:"Orders canceled on or prior to the due date".

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

P-5 [CNI]: Average Completion Notice Interval

Business Rules

The end time for mechanized orders is the time stamp when the notice was delivered to the CLEC interface. ~~For non-mechanized orders the end time will be date and timestamp of order update from the C-SOTS system.~~ For the retail analog, the start time begins when the technician completes the order and ends when the order status is changed to complete in SOCS.

AT&T agrees with the proposal to eliminate non-mechanized orders from this metric. However, AT&T does not agree to move to another reporting category orders currently classified and reported as "non-mechanized".

Report Structure
~~Non-Mechanized Orders~~

SEEM Measure
SEEM   Tier I   Tier II
No..........X..............

AT&T opposes the proposal to add Tier-1 remedies to this measure. After an order status is changed to complete in SOCS, the process for providing the notice of completion status to the CLEC diverges from retail. Therefore, the completion notice for wholesale orders is not analogous, thus making comparable performance levels unobtainable.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

P-7B [CCRT]: Coordinated Customer Conversions – Average Recovery Time
 	
Calculation
 	
Recovery Time = (a - b)
 	
    a = Date and time the initial trouble is cleared and the CLEC is notified by call or email
    b = Date and time the initial trouble is opened with BellSouth
	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T disagrees with the proposed modification but can support modified verbiage as follows:
	
	*a=Date and time the initial trouble is cleared and the CLEC is notified **by available means, including, but not exclusive of, call or e-mail.***

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
P-11 [SOA]: Service Order Accuracy **Exclusions** Projects" with no LSR (excluding M&A projects)	AT&T disagrees with the inclusion of Merger and Acquisition (M&A) transactions in this measure. The measure is designed to measure the accuracy and completeness of the majority of service requests that are submitted by the CLECs during the normal course of business operations utilizing established common ordering processes. M&A activity is not a normal course-of-business process. LSRs submitted for M&A activity require project coordination due to the requirement to transition large volumes of end users in a specific interval. Due to the coordination requirements, these transactions are qualified projects and should be excluded from this measure.
Business Rules * Feature Detail will only be checked for the following USOCs: GCE, GCJ, CREX4, GCJRC, GCZ, DRS, VMSAX, S98VM, S98AF, SMBBX, MBBRX [USOC list incomplete? Could reference to USOC manual be used?]. USOCs and FIDs for Feature Detail will be posted on the Interconnection Website. Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this Website.	The Business Rules reference cited by CompSouth in the P-11 metric is specific to those USOCs where USOC activity and all Field Identifiers (FIDS) are checked for accuracy. While all USOCs on LSR submissions that are added, changed, or deleted are checked for accuracy, to ensure the USOC and USOC activity code is correctly populated, associated FIDS that define feature detail are checked only for this specific set of USOCs identified in the Business Rules. AT&T agrees to reference the USOC manual for a complete list of USOCs, but AT&T disagrees with adding additional USOCs to the feature detail

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
P-13B [LOOS]: LNP-Percent Out of Service < 60 Minutes **Question/Comment** **With new simple port interval will this metric need to be separated into simple and non-simple with different timers? This question should be applied to all the LNP metrics once LNPA recommendation is available.**	AT&T disagrees that a separate disaggregation would add value to the purpose of this metric. AT&T adheres to a <60-minute recovery requirement regardless of the port type. Simple port one day interval currently is being evaluated by the FCC and the Industry body. AT&T believes the FCC obligation applies to all telecommunication providers and any performance standards, as well as any associated remedies, must be reciprocal.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
P-13C [LAT]: LNP-Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date **SQM Disaggregation - Analog/Benchmark** LNP.. >= 9596.5%	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T opposes the proposal to increase the benchmark from 95% to 96.5%. The current benchmark was established as an acceptable level of performance to allow an efficient CLEC a meaningful opportunity to compete. AT&T has met that performance level and nothing has changed that should require a higher performance standard to be established.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
P-13D [LDT]: LNP-Disconnect Timeliness (Non-Trigger) **SQM Disaggregation – Analog/Benchmark** -LNP(Normal Working Hours and Approved After Hours)...............9598% <= 4 Hours -LNP (Unscheduled After Hours Ports) ....9598% <= 4 Hours (excluding non-business hours)	AT&T opposes the proposal to increase the benchmark from 95% to 98%. The current benchmark was established as an acceptable level of performance to allow an efficient CLEC a meaningful opportunity to compete. AT&T has met that performance level and nothing has changed that should require a higher performance standard to be established.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
New measure proposed: **Average Time Required to Update 911 Database (Facility Based Providers)** **Definition** The average time it takes to update the 911 database file.	AT&T opposes adding this metric to the SQM Plan. No rationale was provided by CompSouth to support the addition of this metric and AT&T is not aware of any problematic performance that would justify the establishment of this metric. The measure as presented is "parity by design" since there is no distinguishable difference in data files between retail and wholesale with no opportunity for disparate treatment. Files have various sizes, thus the update time is longer for larger files. The difference in average does not indicate discriminatory treatment, but simply reflects the file size difference. In addition, CompSouth has not addressed the statistical methodology to be applied. The AT&T Plan's statistical methodology requires comparison at a wire center level which is not possible to be derived for this proposed measure. Parties agreed with the implementation of SQM Version 4.0 on October 1, 2005, to remove E911 measures from the SQM Plan and nothing has changed since that time that would necessitate their addition.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
New measure proposed: **Percent Database Accuracy** **Definition** Measures the percentage of database updates completed without error reported for 911 Database.	AT&T opposes adding this metric to the SQM Plan. No rationale was provided by CompSouth to support the addition of this metric and AT&T is not aware of any problematic performance that would justify the establishment of this metric. The measure as presented is "parity by design" since there is no distinguishable difference in data files between retail and wholesale with no opportunity for disparate treatment. In addition, CompSouth has not addressed the statistical methodology to be applied. The AT&T Plan's statistical methodology requires comparison at a wire center level which is not possible to be derived for this proposed measure. The calculation of this measure requires the CLEC to notify AT&T of errors made in the E911 updates. Historically, very few errors were reported to AT&T, thus making the process an unnecessary logistical burden to AT&T. Parties agreed with the implementation of SQM Version 4.0 on October 1, 2005, to remove E911 measures from the SQM Plan and nothing has changed since that time that would necessitate their addition.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
New measure proposed: **911- Average Time to Clear Errors** **Definition** The average time it takes to clear an error after it is detected during the processing of the 911 database file. This is only on resale or UNE loop and port combination orders that AT&T installs.	AT&T opposes adding this metric to the SQM Plan. No rationale was provided by CompSouth to support the addition of this metric and AT&T is not aware of any problematic performance that would justify the establishment of this metric. In addition this Commission no longer regulates UNE loop and port combinations (UNE-P). This measure is parity by design since there is no distinguishable difference in data between retail and wholesale with no opportunity for disparate treatment. Errors are cleared on a first-come/first-served basis with no control by AT&T as to the cause. There is currently no tracking mechanism to differentiate the types of the errors received. In addition, CompSouth has not addressed the statistical methodology to be applied. The AT&T Plan's statistical methodology requires comparison at a wire center level which is not possible to be derived for this proposed measure. Parties agreed with the implementation of SQM Version 4.0 on October 1, 2005, to remove E911 measures from the SQM plan and nothing has changed since that time that would necessitate their addition.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
New measure proposed: **Percentage of Updates Completed into the DA Database within 72 Hours for Facility Based CLECs** **Definition** The percentage of DA database updates completed within 72 hours of receipt of the update from the CLEC for directory change only and within 72 hours of the completion date on the provisioning service order where a provisioning order is required.	AT&T opposes adding this metric to the SQM Plan. No rationale was provided by CompSouth to support the addition of this metric and AT&T is not aware of any problematic performance that would justify the establishment of this metric. This measure is parity by design since there is no distinguishable difference in data between retail and wholesale with no opportunity for disparate treatment. Parties agreed with the implementation of SQM Version 4.0 on October 1, 2005, to remove DA measures from the SQM Plan and nothing has changed since that time that would necessitate their addition. In FPSC Order No. PSC-06-0172-FOF-TP issued March 2, 2006, the Commission stated that "Performance data for services (de-listed elements) no longer under Section 251(c)(3) shall be removed from BellSouth's SQM/PMAP/SEEM." Directory Assistance database is a call-related database and classified as de-listed.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
New measure proposed: **Directory Assistance- Database Update Accuracy** **Definition** Directory Assistance. For Directory Assistance updates completed during the reporting period, the update order that the CLEC sent to AT&T is compared to the Directory Assistance database following completion of the update by AT&T. An update is "completed without error" if the Directory Assistance database accurately reflects the new listing, listing deletion or listing modification, submitted by the CLEC.	AT&T opposes adding this metric to the SQM Plan. No rationale was provided by CompSouth to support the addition of this metric and AT&T is not aware of any problematic performance that would justify the establishment of this metric. This measure is parity by design since there is no distinguishable difference in data between retail and wholesale with no opportunity for disparate treatment. Parties agreed with the implementation of SQM Version 4.0 on October 1, 2005, to remove DA measures from the SQM Plan and nothing has changed since that time that would necessitate their addition. In FPSC Order No. PSC-06-0172-FOF-TP issued March 2, 2006, the Commission stated that "Performance data for services (de-listed elements) no longer under Section 251(c)(3) shall be removed from BellSouth's SQM/PMAP/SEEM." Directory Assistance database is a call-related database and classified as de-listed.

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<u>Proposed Changes from CompSouth (CS)</u>

SQM Reference	AT&T Response
New measure proposed: **<u>Percentage of Electronic Updates that Flow Through the DSR process Without Manual Intervention</u>** <u>Definition</u> Percentage of DSRs from entry to distribution that progress through AT&T ordering systems to ALPS/LIRA.	AT&T opposes adding this metric to the SQM Plan. No rationale was provided by CompSouth to support the addition of this metric and AT&T is not aware of any problematic performance that would justify the establishment of this metric. The proposed metric appears to be duplicative of the O-3 (Percent Flow Through Service Requests) measure that exists in the SQM Plan that measures Directory Service Requests (Reqtype JB). The AT&T SE Region does not have the system ALPS/LIRA; AT&T has one LIST Database for wholesale and retail. Thus, it's parity by design. The only point where there would be manual intervention would be when the service order is generated; again, already measured in O-3 (Flow Through).

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 4: Maintenance & Repair	
M&R-3 [MAD]: Maintenance Average Duration Comment under Report Structure: Report should reflect those tickets received electronically and those received via call to center to access impact of ebonding.	AT&T opposes the proposal to modify the report structure. This metric identifies the actual restoration duration of a trouble. The means by which the trouble ticket is submitted is irrelevant to the purpose of the metric. Whether a trouble ticket is submitted electronically or received as a call to a center has no bearing on this duration calculation.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
M&R-4 [PRT]: Percent Repeat Customer Troubles within 30 Calendar Days **Question under Business Rules:** Should the measure be from ACTS, EBTA, CPSS, is WFA correct place to measure and if yes why?	No. WFA and LMOS are the legacy source systems for trouble report tracking and processing by Network operations for designed and non-designed circuits for the Southeast. The systems noted by CompSouth do not provide a comprehensive view of the ticket history from receipt to close required for reporting. The below descriptions of the systems are provided for further amplification. ACTS – Automated Completion Transmittal System provides notification to the CLECs of order activity and does not provide the necessary information required to produce this measure. The WFA and LMOS systems identify the posted completion date of the service request which is consistent with the intent of Maintenance and Repair metrics. EBTA – Electronic Bonding Trouble Administration GUI process allows CLECs to perform maintenance and repair functions such as creating trouble tickets, performing mechanized loop tests and retrieving trouble ticket status among other things. The data available from the EBTA process is only a portion of the comprehensive view that WFA and LMOS provides on trouble ticket activity. CPSS – Circuit Provisioning Status System is a trouble

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	administration tool that allows the CLEC to enter trouble tickets, check status, etc for special circuits into WFAC via the internet. Much like EBTA, CPSS process is only a portion of the comprehensive view WFA and LMOS provides on trouble ticket activity.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
M&R-5 [OOS]: Out of Service (OOS) > 24 Clock Hours **Question under Business Rules:** Customer trouble reports that are out of service and cleared in excess of 24 clock hours. The clock starts when the customer trouble report is created in LMOS/WFA and is counted if the elapsed time exceeds 24 clock hours. <u>Should ACTS, EBTA, CPSS be used?</u>	No. WFA and LMOS are the legacy source systems for trouble report tracking and processing by Network operations for designed and non-designed circuits for the Southeast. The systems noted by CompSouth do not provide a comprehensive view of the ticket history from receipt to close required for reporting. The below descriptions of the systems are provided for further amplification. ACTS – Automated Completion Transmittal System provides notification to the CLECs of order activity and does not provide the necessary information required to produce this measure. The WFA and LMOS systems identify the posted completion date of the service request which is consistent with the intent of Maintenance and Repair metrics. EBTA – Electronic Bonding Trouble Administration GUI process allows CLECs to perform maintenance and repair functions such as creating trouble tickets, performing mechanized loop tests and retrieving trouble ticket status among other things. The data available from the EBTA process is only a portion of the comprehensive view WFA and LMOS provides on trouble ticket activity. CPSS – Circuit Provisioning Status System is a trouble

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	administration tool that allows the CLEC to enter trouble tickets, check status, etc for special circuits into WFAC via the internet. Much like EBTA, CPSS process is only a portion of the comprehensive view WFA and LMOS provides on trouble ticket activity.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 5: Billing	
B-5 [BUDT]: Usage Data Delivery Timeliness **SQM Level of Disaggregation - Analog/Benchmark.** SQM Level of Disaggregation SQM/SEEM Analog/Benchmark Usage Data Delivery Timeliness... 975% in Six Calendar Days	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T opposes the proposal to increase the benchmark from 95% to 97%. The current benchmark was established as an acceptable level of performance to allow an efficient CLEC a meaningful opportunity to compete. AT&T has met that performance level and nothing has changed that should require a higher performance standard to be established.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
B-10 [BEC]: Percent Billing Adjustment Requests (BAR) Responded to within 25 40 Business Days **Exclusions** IXC Access billing adjustment	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. Ninety-five percent (95%) of the claims received in Florida in the first six months of 2009 were appropriately denied. With that stated, AT&T opposes changing the benchmark for this measure from 95% <=40 business days to 95% <=25 business days. It should be noted that claims received in the first six months of 2009 increased by over eleven fold for the same time period in 2008 (24K in 2008 versus 267K in 2009). Reducing the current benchmark requirements would unduly burden AT&T requiring the addition of resources and the redesign of processes specifically for Florida customers, to the detriment of other customers, for a measure that has no direct impact on the CLEC's end user. AT&T has no control over the volumes of disputes entered by CLECs, whether valid or invalid. Based on the current increase in volume, and assuming the measure is not eliminated, AT&T opposes changing the benchmark for this measure from 95% <=40 business days to 95% <=25 business days and recommends changing the measure from 95% <=40 business days to 95% <=45 business days. This is consistent with other States in the SE Region.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Business Rules This measure applies to CLEC wholesale bill adjustment requests. ~~IXC Access billing adjustment requests are not reflected in this measure.~~	AT&T agrees to the relocation of the IXC billing adjustment verbiage from the Business Rules to the Exclusions section if the reason for this change is for clarity purposes only and is not a substantive change to the intent of the metric or the calculation of performance results.
Should this language be changed to include ExClaim?	AT&T agrees that ExClaim should be referenced within the Business Rules. ExClaim is in use today and will eventually replace ACATs and BDATS in the Business Rules. Proposed verbiage using current version of SQM follows: **Business Rules** This measure applies to CLEC wholesale bill adjustment requests. IXC Access billing adjustment requests are not reflected in this measure. Elapsed time is measured in business days. **The CLEC has the option to use the Web tool ExClaim or submit requests through mail boxes established for this purpose.** The clock starts when BellSouth receives the CLEC Billing Adjustment Request (BAR) form and the clock stops when BellSouth either makes an adjustment through BOCRIS or ACATS (generally next CLEC bill unless adjustment request after middle of the month) or BellSouth denies the request in BDATS or ACATS and BellSouth notifies the CLEC of the BAR resolution. BellSouth will report separately those adjustment requests that are disputed by BellSouth. (BAR form and instructions are found at

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	www.interconnection.bellsouth.com/forms/html/billing&collections.html).

Calculation
 	
Percent Billing Adjustments Responded to within 25 ~~40~~ Business Days = (a / b) X 100
 	
    a = Total number of BAR requests received in the data month that were responded to in 25~~40~~ business days
    b = Total number of BAR requests received in the data month
	Refer to response provided above to address proposed change.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 6: Trunk Group Performance	
TGP-1 [TGP]: Trunk Group Performance	
Exclusions [A4]In Exclusions, trunk groups for which valid data is not available for an entire reporting period is mentioned. What are some examples of when data becomes invalid?	AT&T follows standard industry practices with respect to measurement validation conditions for trunk group data validity. As an example, Table 7.1 of Telcordia SR-TAP-000191, Trunk Traffic Engineering Concepts and Applications, Section 7.1.1 Trunk Group Measurements, presents tests for measurement validity. The exclusion in the TGP-1 measure documents the application for measurement validation conditions noted by Table 7-1. An example of invalid data follows: Overflow cannot exceed Peg Count – When the overflow count is greater than the peg-count, the data is not valid. Peg-count includes all calls attempts that completed and all calls that attempted to complete but overflowed. Calls that overflow may alternate route to another trunk group or, if this is a "final route", will route to overflow tone when no additional trunks are available. Given this example, because the peg-count should always be a larger volume than the overflow count, when overflow count exceeds peg-count the data is invalid.

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Comment [A4]: In Exclusions, trunk groups for which valid data is not available for an entire reporting period is mentioned. What are some examples of when data becomes invalid?

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 7: Collocation	
C-1 [ART]: Collocation Average Response Time **SQM Disaggregation - Analog/Benchmark** SQM Analog/Benchmark • Virtual-Initial.......~~17~~0~~1~~5 Calendar Days • Virtual-Augment...~~10~~7~~15~~ Calendar Days • Physical Caged-Initial..~~15~~ ~~10~~7 Calendar Days • Physical Caged Augment... ~~15 10~~7Calendar Days • Physical Cageless-Initial...~~15 10~~7Calendar Days • PhysicalCageless-Augment...~~15 10~~7Calendar Days	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. In addition, AT&T considers the key service affecting metric regarding collocation to be C-3 (MDD), Collocation Percent of Due Date Missed. With that stated, AT&T opposes CompSouth's proposed changes to the performance standard for each level of disaggregation. The 15-day interval was established as a sufficient level of performance to allow an efficient CLEC a meaningful opportunity to compete. AT&T has met that performance level and nothing has changed that should require a higher performance standard be established. In addition, reducing the intervals to 7 calendar days does not allow AT&T Network personnel sufficient time to complete the required tasks. For example, on applications requesting entrance facilities, it would be unjustifiably burdensome for a field engineer to schedule a visit to verify manhole information, conduit needs, etc. in the 3-4 days allowed.
SEEM Measure SEEM Tier I Tier II ~~No~~Yes.....~~X~~.........	AT&T opposes making the C-1 metric a Tier-1 remedied metric. AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. This metric has not been remedied and nothing has changed to warrant such now.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
C-2 [AT]: Collocation Average Arrangement Time **SQM Disaggregation - Analog/Benchmark** Virtual-Initial----from 60 to *30* Calendar Days Virtual Augment---from 60 to *30* Calendar Days (without space increase) Virtual-Augment---from 60 to *30* Calendar Days (with space increase) Physical Caged-Initial---from 90 to *45* Calendar Days Physical Caged-Augment---from 45 to *24* Calendar Days (without space increase) Physical Caged-Augment---from 90 to *24* Calendar Days (with space increase) Physical Cageless-Initial---from 90 to 60 Calendar Days Physical Cageless-Augment---from 45 to *24* Calendar Days Physical Cageless-Augment---from 90 to *45* Calendar Days (with space increase)	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. In addition, AT&T considers the key service affecting metric regarding collocation to be C-3 (MDD), Collocation Percent of Due Date Missed. With that stated, AT&T opposes CompSouth proposal to the performance standard for each level of disaggregation. The current level of performance was established as a sufficient level of performance to allow an efficient CLEC a meaningful opportunity to compete. AT&T has met that performance level and nothing has changed that should require a higher performance standard to be established. In addition, the proposed intervals will not allow AT&T Network personnel sufficient time to complete tasks required.
SQM Level of Disaggregation [A5]We would also like a new benchmark formula to be used, specifically one that does not average out all customers. We would like one that includes a < or > formula.	AT&T cannot anticipate the CLECs' collocation needs, therefore equipment is ordered on an as-needed basis. The current collocation intervals in some cases are already less than the vendor's standard intervals, so any further reduction would not be possible. For example, without a cage that is the correct size as specified by the order, the manufacturing intervals for the necessary equipment are 3 to 4 weeks. AT&T's work activities include determining a location within the CO, issuing a contract to the

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Comment [A5]: We would also like a new benchmark formula to be used, specifically one that does not average out all customers. We would like one that includes a < or > formula.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	manufacturer, obtaining a building permit and, once the materials arrive, installing the cage lighting, electrical outlets, and grounding additions and infrastructure work. Therefore, the 45-day interval would be nearly impossible to meet.
	Given the vendor ordering intervals and AT&T's required work, meeting a 24-day interval for Augment– Physical or Virtual is just not possible. The following provides the action list required for an augment request: • AT&T submits the BellSouth Equipment Request (BER) (1 day) • AT&T receives the Preliminary Telephone Equipment Order (TEO) (10 days) • AT&T submits the approved TEO (2 days) • Vendor completes order due information (2 days) • Vendor receives equipment (7-28 days – based on supplier) • Vendor starts job (1-2 days – after receiving equipment) • Vendor Complete job (1-28 days – depends on install hrs.) • Vendor notifies AT&T (2 days) This is example of non-expedited ordering interval (in business days) for common equipment. • DSX-1 Panel (1-2 weeks)

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
SEEM Measure SEEM Tier I Tier II No<u>Yes</u>..........<u>X</u>.............	• DSX-1 Bay (2-4 weeks) • DSX-3 Panel (1-3 weeks) • DSX-3 Bay (2-4 weeks) • LGX Panel (216 jacks) (1-2 weeks) • LGX Bay (2-4 weeks) • 89 Type Blocks (DS0) (1 week) AT&T opposes making the C-2 metric a Tier-1 remedied metric. AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. This metric has not been remedied and nothing has changed to warrant such now.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Section 8: Change Management	
CM-1 [NT]: Timeliness of Change Management Notices	
Definition	
This report measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. The Accessible Letter communicates the CR being corrected in either a major or minor release. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T opposes CompSouth's modification to the definition referencing the Accessible Letter. This is not relevant to the definition or the intent of the metric.
Exclusions	
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)	AT&T does not agree with the proposed deletion under Exclusions. AT&T will agree to strike "such as the system software vendor changes (for example: a patch to fix a software problem)".
SEEM Measure SEEM Tier I Tier II Yes .... X X	AT&T opposes the addition of Tier-1 remedies. This metric is based on a regional process and performance is calculated using regional data. There is no current equitable means for reporting results at an individual CLEC level as some changes for which a notice has been provided may not impact all CLECs.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

CM-3 [DT]: Timeliness of Documentation Associated with Change
 	
SEEM Measure
 	
  SEEM   Tier I   Tier II
    Yes .... X X
	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T opposes the addition of Tier-1 remedies. This metric is based on a regional process and performance is calculated using regional data. There is no current equitable means for reporting results at an individual CLEC level as some changes for which requirements or business rule documentation have been provided may not impact all CLECs.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
CM-5 [ION]: Notification of CLEC Interface Outages **SQM Disaggregation - Analog/Benchmark** By interface type for all interfaces accessed by CLECs...........97% <= 15 Minutes Interface....................Applicable to EDI..............................CLEC CSOTS.........................CLEC LENS............................CLEC TAG..............................CLEC ECTA............................CLEC TAFI.........................CLEC/BellSouth LASR.......................CLEC XML......................CLEC ACTS.....................CLEC EBTA/CPSS............CLEC LEX......................CLEC Verigate...................CLEC	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to the consistent high level of performance. With that stated, AT&T agrees Verigate should be included in the measure; however, AT&T opposes the remaining additions proposed by CompSouth to the disaggregation of this measure. The purpose of this metric is to measure the outage notification time for front-end interfaces that AT&T provides CLECs. The systems and interfaces noted in CompSouth's proposal either are not currently used in the AT&T SE region or are not a front-end interface. A brief explanation for each system follows: • LASR – Local Access Service Request System is designed to accept requests from CLECs via LENs and TAG. LASR is not an external front-end interface. LASR is also used internally by AT&T to access and work partially mechanized requests. • XML Gateway – a new interface that is not used in SE at this time. • ACTS – Automated Completion Transmittal System is not an Interface. CLECS have the option to use ACTS to acquire Completion information on certain service orders. • EBTA – Electronic Bonding Trouble Administration is a M&R system not used in SE at this time. • LEX – Local Service Request Exchange is not in use in

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	SE but is tentatively scheduled to replace LENS in November 2009. AT&T will add LEX to this measure when it is introduced.
SEEM Measure SEEM Tier I Tier II NoYes .... X	AT&T opposes the addition of Tier-1 remedies. This metric is based on a regional process and performance is calculated using regional data. There is no current equitable means for reporting results regarding interface outage notification at an individual CLEC level.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
CM-6 [SEC]: Percentage of Software Exclusions ~~Software corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs~~ SEEM Measure SEEM Tier I Tier II Yes .... X ....X Comment: **Discuss the EDR report and AT&T's claim that they have 5 days to evaluate whether the patch placed in production is actually working.**	AT&T disagrees with the proposed deletion under Exclusions. This exclusion is meant to capture any possible exception that requires an extended interval regarding a software implementation where the CLECs have agreed to that extended interval. Had the CLECs not agreed to an interval longer than defined by the metric, then it would have counted if missed. AT&T opposes the addition of Tier-1 remedies. This metric is based on a regional process and performance is calculated using regional data. There is no current equitable means for reporting results regarding the correction of software errors at an individual CLEC level and not all software errors impact all CLECs. The EDR is the Enhanced Defect Report. It is available via CLEC online. The report is updated daily, with all CLEC impacting defects, current status, date opened, requisition type, description and, when applicable, work-arounds. The status of "production validation" is used when a defect fix has been applied in production. The defect can remain in this status for up to 5 days while it is validated in the production environment.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
CM-7 [CRA]: Percentage of Change Requests Accepted or Rejected within 10 Business Days **SQM Level of Disaggregation - Analog/Benchmark** Requests Accepted/Rejected...9598% within Interval	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to low volume and the consistent high level of performance. With that stated, AT&T is opposed to the proposed change of the benchmark from 95% to 98%. The benchmark was established as an acceptable level of performance to allow an efficient CLEC with a meaningful opportunity to compete. AT&T has met that performance level and nothing has changed that should require a higher performance standard to be established.

SEEM Measure
    SEEM   Tier I   Tier II
    Yes .... X X
	AT&T opposes the addition of Tier-1 remedies. This metric is based on a regional process and performance is calculated using regional data.

Added Comment: AT&T is not using full capacity.	With respect to CompSouth's allegation regarding capacity, release capacity is irrelevant to this measurement. Release capacity is not a criteria used for the acceptance or rejection of a change request.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
CM-8 [CRR]: Percent Change Requests Rejected **CompSouth proposes:** **SEEM Measure** SEEM Tier I Tier II NoYES X	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to low volume and the consistent high level of performance. With that stated, AT&T is opposed to the proposed addition of Tier-1 remedies to this regional measure. This measure is in the SQM Plan for diagnostic purposes only. The change management process has established criteria as noted in the business rules for which a CLEC's change request can be rejected. This metric simply provides results based on the application by AT&T of that criterion.
Added Comment: Suggest report include number of defects introduced by minor release as a separate disaggregation.	AT&T opposes the creation of a separate disaggregation for this diagnostic measure. The number of defects resulting from a release has no relevance to the change requests rejected that is measured by this metric.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
CM-11 [SCRI]: Percentage of Software Change Requests Implemented within 60 Weeks of Prioritization **Exclusions** —Software change requests implemented later than 60 weeks with the consent of the CLECs	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to low volume and the consistent high level of performance. With that stated, AT&T is opposed to the proposed deletion under Exclusions. This exclusion is meant to capture any possible exception that requires an implementation later than 60 weeks where the CLECs have agreed to that extended interval. Had CLECs not agreed to an interval longer than defined by the metric, then it would have counted if missed.

SEEM Measure
 	
  SEEM   Tier I   Tier II
   Yes   X   X
	AT&T opposes the addition of Tier-1 remedies. This metric is based on a regional process and performance is calculated using regional data. There is no current equitable means for reporting results regarding software implementation at an individual CLEC level and not all software implementations impact all CLECs.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
CM-11A [PCRI]: Average Time to Implement Process Change Requests Definitions This report measures the average time BellSouth takes to implement prioritized Process Change Requests, and the time Change Requests are in the Accepted Held status. Exclusions ‑‑‑Process Change Requests implemented later than 60 days with the consent of the CLECs	AT&T's position is the SQM Plan should be simplified by the elimination of this metric due to no volume. With that stated, AT&T is opposed to the addition of Change Requests in Held status to the definition of this metric. The purpose of this metric is to determine the average time to implement a change after it has been prioritized. Held Change Requests are not included in prioritization process. AT&T is opposed to the proposed deletion under Exclusions. This exclusion is meant to capture any possible exception that requires a Process Change Requests implementation later than 60 days where the CLECs have agreed to that extended interval. Had CLECs not agreed to an interval longer than defined by the metric, then it would have impacted the average implementation time computation.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix A: Glossary of Acronyms and Terms	
- **ACT Automated Completion Transmittal Systems** - **BOG Bulk Order Generator**	While AT&T does not necessarily agree that the CompSouth proposed changes should be made to the Glossary of Acronyms and Terms, AT&T agrees to make any necessary modification to the glossary as a result of all agreed upon and/or ordered changes to the SQM Plan.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix C: OSS Interface Tables	
OSS-1 [ARI]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair) Comment: under Table:4: If LENS works on the TAG/XML code why are the table 3 and 4 different? AT&T's post July release needs to be described for Table 4. Added under OSS-2, Table 1: ACTS.......CLEC.....X NVAT......CLEC....X BOG.........CLEC.... X	With respect to CompSouth's question concerning differences between table 3 and 4, the backbone architectural design for pre-order functionality slightly differs between TAG/XML and LENS. Both applications access and retrieve the same data, but from different data sources. For example, TAG/XML retrieves the information from a local copy of PSIMS data whereas LENS accesses COFFI for the same data. For the LENS implementation, COFFI was used in the design due to the GUI user actions and the way that LENS groups and displays the Feature/Service data. Because TAG/XML is just returning strings of data instead of organizing it into a display format, the PSIMS data source was the preferred design approach. LENS does not support the TN Reservations that are supported in TAG/XML with the ATLAS-MLH (Multi-Line Hunting) and ATLAS-DID (Direct Inward Dialing) contracts. If needed, users must perform these in some way other than via LENS. LENS only supports TN Reservation for standard POTS TNs (ATLAS-TN contract). With respect to CompSouth's comments that AT&T's post-July release needs to be described for Table 4, the intent of the plan is to describe existing system architecture that is being measured and not future architecture. AT&T proposes that a process be developed to provide the flexibility to update this table and any other applicable tables for impacted system changes resulting from a release. That is the intent of the

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	Administrative Changes section proposed by AT&T in the front of the SQM document to allow administrative changes that do not substantively change the SQM Plan. The Definition, Exclusions, Business Rules, and Calculation for a metric do not change when there is a change in an interface, support application, or database system resulting from an OSS release. Any changes from an OSS release (i.e. - post-July release) should be made to the SQM Plan by AT&T providing notice to the Commission and the industry to update the tables. This will ensure compliant plan documentation that is in concert with existing system architecture. For the additional interfaces that have been proposed as an addition to the OSS-2, OSS Table 1, AT&T does not agree. The intent of the OSS-2 metric is to captures the functional availability of CLEC interfaces and legacy systems that are accessed as a percentage of schedule availability for all CLECs. Noted below are the various reasons each system should not be included: ACTS – Automated Completion Transmittal System process notifies CLECs of order completion or jeopardy status. The WFA and LMOS completion date identifies the actual completion of the service request which is consistent with the intent of Maintenance and Repair metrics. This is not an interface to the CLECs. NVAT: This acronym does not exist in any documentation available for the AT&T 9-state or 13-state architecture definitions. AT&T requires additional clarification in order for

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
	a response to be provided. BOG: Bulk Order Generator (BOG) is tentatively scheduled to be retired in July 2010. ERepair was intended to be turned up in November 2007 to replace Electronic Communication Trouble Administration (ECTA) and Circuit Provisioning Status System – Trouble Administration (CPSS-TA); however, that did not take place. Current plans are to transition ECTA to Electronic Bonding Trouble Administration (EBTA). That project is not yet scheduled.
OSS Table 2, OSS Interface WHLS eRepair..............x Comment I believe eRepair was withdrawn, how does EBTA, CPSS, fit into this chart?	

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix D: BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments	
Deletion under item #6 & 7: 6. SQM Performance data will be reposted for a maximum of three months in arrears, ~~from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, BellSouth will correct the data beginning with the month of detection (May) and the three months preceding — April, March and February.~~ 7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears ~~from date of detection.~~	No rationale was provided by CompSouth to support the proposed deletion. The intent of this section is to provide an example of how the three-months-in-arrears is determined for purposes of reposting SQM performance data. AT&T requests CompSouth define when the start time would begin for a reposting if not from the date of detection as illustrated in the example. AT&T does not oppose working with CompSouth to re-word these sections for better clarification.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix H: Special Access Measurements	
Measurement: SA-1 FOC Receipt **Removal under Exclusions:** - ~~Unsolicited FOCs~~	AT&T's position is the SQM Plan should be simplified by the elimination of this metric. Special Access is measured as part of the commitments made to the Federal Communications Commission in the AT&T and BellSouth merger agreement. With that stated, AT&T disagrees with the proposal to delete the unsolicited FOC exclusion. Unsolicited FOCs are duplicate FOCs that are sent at the request of the CLEC/IXC. AT&T has an obligation to respond to a request only one time. As an example, timestamps indicate that an initial FOC was sent. However, and for whatever reason, if the CLEC/IXC requests another FOC, this second request should be excluded since this may inflate unnecessarily the actual metric results.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Measurement: SA-2 FOC Receipt Past Due Removal under Exclusions: — Unsolicited FOCs	AT&T's position is the SQM Plan should be simplified by the elimination of this metric. Special Access is measured as part of the commitments made to the Federal Communications Commission in the AT&T and BellSouth merger agreement. With that stated, AT&T disagrees with the proposal to delete the unsolicited FOC exclusion. Unsolicited FOCs are duplicate FOCs that are sent at the request of the CLEC/IXC. AT&T has an obligation to respond to a request only one time. As an example, timestamps indicate that an initial FOC was sent. However, and for whatever reason, if the CLEC/IXC requests another FOC, this second request should be excluded since this may inflate unnecessarily the actual metric results.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Measurement: SA-3 Offered Versus Requested Due Date **Removal under Exclusions:** ~~Unsolicited FOCs~~	AT&T's position is the SQM Plan should be simplified by the elimination of this metric. Special Access is measured as part of the commitments made to the Federal Communications Commission in the AT&T and BellSouth merger agreement. With that stated, AT&T disagrees with the proposal to delete the unsolicited FOC exclusion. Unsolicited FOCs are duplicate FOCs that are sent at the request of the CLEC/IXC. AT&T has an obligation to respond to a request only one time. As an example, timestamps indicate that an initial FOC was sent. However, and for whatever reason, if the CLEC/IXC requests another FOC, this second request should be excluded since this may inflate unnecessarily the actual metric results.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Measurement: SA-4 On Time Performance To FOC Due Date Removal under Exclusions: —Unsolicited FOCs	AT&T's position is the SQM Plan should be simplified by the elimination of this metric. Special Access is measured as part of the commitments made to the Federal Communications Commission in the AT&T and BellSouth merger agreement. With that stated, AT&T disagrees with the proposal to delete the unsolicited FOC exclusion. Unsolicited FOCs are duplicate FOCs that are sent at the request of the CLEC/IXC. AT&T has an obligation to respond to a request only one time. As an example, timestamps indicate that an initial FOC was sent. However, and for whatever reason, if the CLEC/IXC requests another FOC, this second request should be excluded since this may inflate unnecessarily the actual metric results.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
PROVISIONING **Measurement: SA-5 Days Late** **Removal under Exclusions:** — Unsolicited FOCs	AT&T's position is the SQM Plan should be simplified by the elimination of this metric. Special Access is measured as part of the commitments made to the Federal Communications Commission in the AT&T and BellSouth merger agreement. With that stated, AT&T disagrees with the proposal to delete the unsolicited FOC exclusion. Unsolicited FOCs are duplicate FOCs that are sent at the request of the CLEC/IXC. AT&T has an obligation to respond to a request only one time. As an example, timestamps indicate that an initial FOC was sent. However, and for whatever reason, if the CLEC/IXC requests another FOC, this second request should be excluded since this may inflate unnecessarily the actual metric results.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Measurement: SA-6 Average Intervals - Requested/Offered/Installation **Removal under Exclusions:** — Unsolicited FOCs	AT&T's position is the SQM Plan should be simplified by the elimination of this metric. Special Access is measured as part of the commitments made to the Federal Communications Commission in the AT&T and BellSouth merger agreement. With that stated, AT&T disagrees with the proposal to delete the unsolicited FOC exclusion. Unsolicited FOCs are duplicate FOCs that are sent at the request of the CLEC/IXC. AT&T has an obligation to respond to a request only one time. As an example, timestamps indicate that an initial FOC was sent. However, and for whatever reason, if the CLEC/IXC requests another FOC, this second request should be excluded since this may inflate unnecessarily the actual metric results.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Measurement: SA-7 Past Due Circuits **Removal under Exclusions:** ~~Unsolicited FOCs~~	AT&T's position is the SQM Plan should be simplified by the elimination of this metric. Special Access is measured as part of the commitments made to the Federal Communications Commission in the AT&T and BellSouth merger agreement. With that stated, AT&T disagrees with the proposal to delete the unsolicited FOC exclusion. Unsolicited FOCs are duplicate FOCs that are sent at the request of the CLEC/IXC. AT&T has an obligation to respond to a request only one time. As an example, timestamps indicate that an initial FOC was sent. However, and for whatever reason, if the CLEC/IXC requests another FOC, this second request should be excluded since this may inflate unnecessarily the actual metric results.

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Paragraph 4.3.1.3 (Additional Flat Fee) Tier-1 Enforcement Mechanisms apply on a per transaction basis and will escalate based upon the number of consecutive months that fail for each Enforcement Mechanism Element for which BellSouth has reported non-compliance. Failures beyond Month 6 will be subject to Month 6 fees and an additional flat fee for each month greater than 6. All transactions for an individual CLEC will be consolidated for purposes of calculating Tier-1 Enforcement Mechanisms.	AT&T disagrees with arbitrarily adding a $1,000 flat fee per missed measure, after the 6th month. The six-month escalator reflected in the Appendix A Fee Schedule for the SEEM Plan provides more than adequate remedies for any inconveniences that may have been caused by perceived differences in service levels. CompSouth's proposed additional flat fee is an unjustified and additional unwarranted penalty.
Paragraph 4.5.2 (Force Majeure "FM") BellSouth shall not be obligated to pay Tier-1 or Tier-2 Enforcement Mechanisms (SEEM payments) for non-compliance with a performance measurement if such non-compliance was the result of any Force Majeure Event that either directly or indirectly prevented, restricted, or interfered with performance as measured by the SQM/SEEM Plan. Such Force Majeure Events include non-compliance caused by reason of fire, flood, earthquake or like acts of God, wars, revolution, civil commotion, explosion, acts of public enemy, embargo, acts of the government in its sovereign capacity, labor difficulties, including without limitation, strikes, slowdowns, picketing, or boycotts, or any other circumstances beyond the reasonable control and without the fault or negligence of BellSouth. BellSouth, upon giving prompt notice to the Commission and CLECs as provided below, shall be excused from such performance on a day-to-day basis to the extent of such prevention, restriction, or interference; provided, however, that BellSouth shall use diligent efforts to avoid or remove such causes of non-performance. As forseeable events,	AT&T opposes the additional requirement for a disaster declaration by a state or federal government. Force Majeure, simply stated, is where an unexpected or uncontrollable event has been incurred that impacts AT&T's ability to meet performance obligations. Section 4.4.2 of the SEEM Plan provides a detailed and sufficient definition. To the extent that a CLEC has objections or concerns with respect to AT&T's declaration of a Force Majeure event, Section 4.5.2.2 of the SEEM Plan permits the filing of written comments with the Commission to show that the relief is not reasonable under the circumstances.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
rain and lightning shall not constitute the basis for a Force Majeure Event unless a disaster is contemporaneously declared by State or Federal goveernment in th earea where the Force Majeure Event also occurs.	
Paragraph 4.5.2.1 To invoke the application of Section 4.5.2 (Force Majeure Event),within Fifteen (15) calendar days of the Force Majeure Event's beginning BellSouth will provide written notice to the Commission and post notification of such filing on BellSouth's website wherein BellSouth will identify the Force Majeure Event, the affected measures, and the impacted wire centers, including affected NPAs and NXXs. Unless the nature of the Force Majeure Event precludes such notice, BellSouth shall report via a web site posting a list of the imapcted wire centers and a list of associaited trouble reports or held orders within 24 hours of the beginning of the Force Majeure event.	AT&T opposes the additional requirement that a written notice must be provided within fifteen (15) calendar days of the Force Majeure Event. AT&T affirms that a written notice must be provided within a reasonable timeframe, but the Force Majeure Event itself should dictate what is reasonable. To the extent that a CLEC has objections or concerns with respect to AT&T's declaration of a Force Majeure event, Section 4.5.2.2 of the SEEM Plan permits the filing of written comments with the Commission to show that the relief is not reasonable under the circumstances. AT&T opposes the additional requirement for a website posting within 24 hours of a list of impacted wire centers and associated trouble reports or held orders. AT&T affirms its obligation to post data to the website within a reasonable time and has met this obligation for all prior Force Majeure Events. AT&T proposes to remove the requirement for providing the total number of pending service orders and trouble reports broken down by CLECs and AT&T. AT&T currently provides and will continue to provide the Area Dispatch Status Report. This color coded report provides a status by Wire Center, CLLI and NPA/WC of the dispatch status. That information is meaningful and provides an efficient CLEC with sufficient information to status both internal operations and external customers regarding the recovery and restoration effort.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix A (Fee Schedule)	
Table 1: Fee Schedule for Tier 1 Per Transaction Fee Determination **Performance Measure** **Billing – BIA (see Note 1)** Month 1 through *6 62% **Billing – BIT** Months 1 through *6 $157 **Billing – BUDT (see Note 2)** Months 1 through *6 $0.15046 **Billing – BEC (see note 3)** Months 1 through *6 $50,000.07 *All consecutive month failures greater than 6 shall have an additional fee of $1,000.00 per metric in addition the the Fee schedule applied.	AT&T disagrees with changing the rates in the SEEM Plan's Fee Schedule, Appendix A. The SEEM Plan is designed to provide more than adequate remedies to CLECs for any inconveniences that may have been caused by perceived differences in service levels. Based on AT&T's assessment using 6 months of actual data, Tier-1 remedies paid to CLECs would increase for one billing measure alone by over $500K for Florida and over $2M for the SE region as a result of the proposed CompSouth fee schedule change. This is an unjustified and unwarranted fee increase that goes well beyond the intent and spirit of the SEEM Plan and any actual damage that may have been incurred as a result of AT&T's billing performance as measured by the SQM metrics. AT&T disagrees with arbitrarily adding a $1,000 flat fee per missed measure, after the 6th month. The six-month escalator reflected in the Appendix A Fee Schedule for the SEEM Plan provides more than adequate remedies for any inconveniences that may have been caused by perceived differences in service levels. CompSouth's proposed additional flat fee is an unjustified and additional unwarranted penalty.
Table 2: Tier 2 Per Transaction Fee Determination	

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response

Measure	Retail Analogs BCV not Applicable		
Billing – BIA (note 1)	~~1.3~~ 1.36%		
Billing – BIT (note 1)	~~$4~~ $15		
Billing – BUDT (note 1)	~~$.03~~ $..15		
Billing – BEC (note 1)	~~$0.04~~ $50.00		

Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix B: SEEM Submetrics	
B.1 Tier 1 Submetrics Added to Tier-1 Submetrics table entries for: OSS-1, O-12, P-5, CM-1, CM-3, CM-5, CM-6, CM-7, CM-8, CM-11, (5 new DA & 911 measures), OSS-2, P-2A, and C-2	Refer to AT&T's response provided for individual SQM Metrics with respect to the addition of Tier-1 remedies proposed by CompSouth.

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix C: Statistical Properties and Definitions	
C.2 Testing Methodology – The Truncated Z *Invoice Accuracy = [(a – b)/a] x 100* a = *Absolute Value of Total Billed Revenues during current month* b = *Absolute Value of Total Billing Related Adjustments during current month* A numerical example of the remedy calculation is given below: Example: CLEC DATA Bill Adjustments $14,660.00 Total Billed Revenue $336,529.00 BellSouth DATA Bill Adjustments $6,018,969.26 Total Billed Revenue$484,691,922.40 CLEC Invoice Accuracy Ratio = [(336,529.00-14,660.00)/ 336,529.00] x 100 = 95.64 BST Invoice Accuracy Ratio = [(484,691,922.40-6,018,969.26)/ 484,691,922.40] x 100 = 98.75	AT&T neither opposes nor agrees to the deletion of the formulae example. AT&T requests rationale be provided by CompSouth to support the proposed deletion.

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SQM Reference	AT&T Response
Thus, the calculated values are: CLEC Result = 96% BellSouth Result = 98.75% In Florida once it is determined that the BST percent is higher, BellSouth pays the CLEC according to the Florida Fee Schedule. The calculation would be the difference in the CLEC Invoice Accuracy Ratio and the BST Invoice Accuracy Ratio multiplied by the total CLEC Bill Adjustments. Then multiply the result by 2% (Appendix A: Fee Schedule) • 98.75%-95.64%=3.11% • 3.11% x $14,660= $455.92 • $455.92 x 2%= $9.12	

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Proposed Changes from CompSouth (CS)

SQM Reference	AT&T Response
Appendix F: BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments	
6. SQM Performance data will be reposted for a maximum of three months. ~~in arrears from date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting,~~ BellSouth will correct the data ~~beginning with the month of detection (May) and the three months preceding April, March and February.~~ 7. When updated SQM performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears. ~~from date of detection. Recalculated SEEM payments due to reposted SQM data will be made for the same months that the applicable data was reposted. The~~ three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered for the data month of May, BellSouth will correct data for May and the three preceding months – April, March and February.	No rationale was provided by CompSouth to support the proposed deletion for item 6 or 7 of Appendix F. The intent of item 6 is to provide an example of how the three-months-in-arrears is determined for purposes of reposting. Item 7 follows the process illustrated by item 6. AT&T requests CompSouth define when the start time would begin for a reposting if not from the date of detection as illustrated in the example. AT&T does not oppose working with CompSouth to re-word these sections for better clarification.

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