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July 28, 2004

BY HAND DELIVERY
Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP – BellSouth Performance Measurements

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen (15) copies of the CLEC's Comments on BellSouth Service Quality Measurement Plan Version 3.00 issued July 1, 2003 in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely yours,

Tracy W. Hatch

TWH/las
Enclosure
cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail on this 28th day of July 2004 to:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment of Operations Support System Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth Track)	)))))	Docket No. 000121A-TP Filed: July 28, 2004

CLEC COALITION'S COMMENTS ON BELLSOUTH'S SERVICE QUALITY MEASUREMENT PLAN VERSION 3.00 ISSUED JULY 1, 2003

The CLEC Coalition, consisting of AT&T Communications of the Southern States, Inc. ("AT&T"); MCImetro Access Transmission Services, LLC ("MCI"); ACCESS Integrated Networks, Inc. ("AIN"); DIECA Communications Company d/b/a Covad Communications Company ("Covad"); and Network Telephone, Inc. ("Network Telephone) hereby submits comments concerning the changes it proposes to BellSouth's current Performance Assessment Plan. Pursuant to the Staff's Notice, these comments "specifically address the BellSouth Service Quality Measurement Plan Version 3.00 issued July 1, 2003."[1] Because the Commission bifurcated the comments for the SQM and Self-Effectuating Enforcement Mechanism ("SEEM")[2], these comments will focus specifically on SQM changes and only address those SEEM changes that have specific impacts on the SQM.

I. INTRODUCTION

This Commission has expended much time and effort in evolving the Performance Assessment Plan into its current state. The CLEC Coalition believes both the current SQM and SEEM generally achieve some of the objectives for which the Performance Assessment Plan was

1 Notice Of Six-Month Review Workshop, Florida Public Service Commission, Docket 000121A, June 30, 2004.
2 Comments On Six-Month Review of BellSouth's Performance Assessment Plan, Florida Public Service Commission, Docket 000121A, July 16, 2004.

established. However, some refinements are necessary. Two years of experience with the current plan provide the foundation for recommendations, which will enhance the current Performance Assessment Plan.

II. THE CURRENT PLAN IS A GOOD STARTING POINT

The CLEC Coalition continues to agree with the general structure of the SQM and SEEM[3], as described below:

- The current metrics measure processes that are critical to the CLECs' ability to provide quality service to their customers. However, BellSouth's implementation of new processes, as well as other changes, necessitate additional metrics.
- The SEEM plan is structured to evaluate: (1) the quality of support delivered to each individual CLEC as compared to BellSouth's own retail operations, and (2) the quality of service BellSouth delivers to the CLEC industry as a whole when compared to BellSouth's own retail operations. Monetary consequences in the former situation are payable to the affected CLEC; in the latter, they are payable as regulatory fines to this Commission, to protect the public interest
- Remedies accrue on a per submetric basis as opposed to a per transaction basis.
- For the most part, the current disaggregation allows for like-to-like comparisons. The current set of submetrics facilitates accurate comparisons of results to expected performance.

3 A complete set of SEEM change recommendations will be reflected in the August 18, 2004 filing.

- Statistical procedures are used for parity determinations. That is, statistical procedures determine whether BellSouth's wholesale performance is in compliance with the retail analog established for a particular sub-measure.

The Commission's Six-Month Review of BellSouth's Performance Assessment Plan provides an important opportunity to share recommendations for improving the effectiveness of BellSouth's existing measures, introduce other measures that should be included in the SQM, and determine whether the current remedy structure is effective in driving BellSouth's performance to the required standards. The CLEC Coalition will address these broad areas, focusing these comments on the vital issue of the SQM plan.

III. RECOMMENDED CHANGES TO SQM

A. Certain Metrics Should Be Added To The SQM[4]

1. Billing Completion Notice

Currently, CLECs are unable to service their customers that have been migrated from BellSouth if BellSouth has not completed the order in the Billing systems. The Carrier Access Billing System ("CABS") and Customer Recorded Information System ("CRIS") must be updated by BellSouth in order for the CLEC to be able to submit customer service requests electronically. During the previous Six-Month Review, BellSouth had not implemented billing completion notification functionality. This capability is now available. CLECs are currently not receiving billing completion notification in a timely manner.

2. Percent of Customer Trouble Tickets Closed Electronically

CLEC files, which are updated upon receipt of an electronic closure notification, are handicapped because BellSouth is not providing electronic notification. In its absence, manual

4 SQM pages for each additional metric are contained in Appendix A.

updates are required, thereby consuming additional CLEC staff time. Given that a CLEC electronically submits its trouble tickets, the notification of the closure of the trouble ticket should be sent electronically by BellSouth, instead of its current practice of manual notification.

3. CCC/NCC[5]– Percent Completed Without Service Disruption

The Commission has already established a measure which captures the average interval customers are out of service when problems arise in conjunction with a hot cut (Measure P7B). However, the frequency with which these outages occur is a vital area of performance that is not currently monitored. Both the frequency as well as the duration of service outages resulting from hot cuts must be monitored to ensure cut-over quality.

4. Percent Batches Started On Time

In order to be successful, an effective batch migration process must rely on well-formulated methods of execution, as well as timely, electronic two-way communication. As a result, BellSouth and the CLEC must know when the batch hot cut is to begin so that both parties can be prepared to perform their respective responsibilities efficiently and with minimum customer disruption or inconvenience. Therefore it is important for batches to have scheduled start times, which must be monitored for adherence. BellSouth should start within 15 minutes of the scheduled start time 98% of the time. This level of performance is essential such that CLEC as well as ILEC resources are not wasted due to delayed starts.

B. Several Changes Should Be Made To Existing Metrics

The recommended changes to the following existing metrics are contained in Appendix B:

FOC Timeliness

OSS Interface Availability

5 Coordinated Customer Conversion/Non-Coordinated Customer Conversion

Percent Flow-Through

Percent Rejected Service Requests

Reject Interval

FOC/Reject Completeness

Coordinated Customer Conversion Interval

Average Completion Interval

Coordinated Customer Conversion Interval – Average Recovery Time

Percent Change Requests Implemented within 60 Weeks of Prioritization

Hot Cut Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order

Trunk Blockage – Specific

Usage Data Delivery Timeliness

Mean Time to Deliver Usage

IV. OTHER ISSUES

A. Additional Migration Types should be added to BellSouth's reported Hot Cut Metrics.

In a mass market environment, large quantities of loops will be transferred between and among many different carriers in every conceivable direction using the hot cut process. No metric currently measures BellSouth's performance in conducting such activity. Migration types that should be added to BellSouth's reported hot cut metrics include the following:

- Retail to UNE-L and EELs;
- UNE-P to UNE-L and EELs;

- Resale to UNE-L and EELS;
- UNE-L and EELs to UNE-P;
- UNE-L and EELs to Resale; and
- UNE-L and EELs to UNE-L.

B. Performance Improvement Plan and Resolution Process.

The CLEC Coalition recommends a process where performance that may be in parity but of poor quality can be brought to BellSouth's attention with a request that such performance be improved. Such a process could also be used when the remedies do not seem to be curing problems where the metrics are failing parity or benchmarks as well.

As an example, MCI's Mass Markets business unit is concerned about UNE-P customers being out-of-service greater than 24 hours more than 95% of the time. MCI does not receive remedies for this performance because it generally is in parity. Over the last eight reported months (see below), BellSouth has only been below double digits once on MCI UNE-P troubles OOS > 24 Hours.

Month	OSS> 24 Hours
10/1/2003	21.29%
11/1/2003	23.88%
12/1/2003	14.61%
1/1/2004	14.07%
2/1/2004	17.97%
3/1/2004	14.67%
4/1/2004	9.00%
5/1/2004	13.87%

A process must be developed to improve wholesale and (in this case) retail performance. This could be done by creating action plans and commitments on a business-to-business basis,

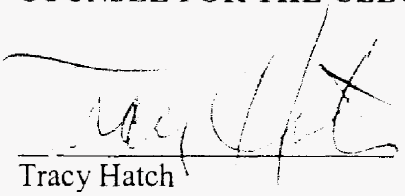
with the Commission's oversight and intervention if such action plan and commitments prove inadequate.

V. CONCLUSION

The work of the FPSC in adopting the Performance Assessment Plan represents a significant step toward ensuring nondiscriminatory treatment of competitive carriers in Florida. By building on the important achievements in this docket, this Commission will make even greater strides in evolving the Performance Assessment Plan that will ensure BellSouth's compliance with its contractual and legal obligations. The CLEC Coalition respectfully submits that its proposals herein aid those objectives.

Respectfully filed this the 28th day of July 2004.

COUNSEL FOR THE CLEC COALITION



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APPENDIX A

B-11: BILLING COMPLETION NOTICE TIMELINESS

Definition
This report measures the percent of completed orders for which BellSouth sent a timely billing completion notice to the CLEC.

Exclusions
None

Business Rules
A service order is considered completed for Billing when the service order is posted in the Billing systems The start time is when the order is completed in SOCS. The end time is when the billing completion notification is sent to the CLEC. This measurement will determine the percentage of billing completion notifications sent within 2 days.

Calculation

Billing Completion Notice Timeliness = (a ÷ b) x 100

- a = Number of Billing Notices Sent to CLEC Within 2 Calendar Days of Service Order Completion
- b = Total Number of Service Orders Completed during the reporting period

Report Structure
- CLEC Specific
- CLEC Aggregate

Data Retained
- Report Period
- Service Order Completion Date
- Date Of Billing Notice

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• State	• 95% within 2 Days

SEEM Measure

SEEM Measure		
	Tier I	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• State	• 95% within 2 calendar days

P-14: PERCENT OF CUSTOMER TROUBLE TICKETS CLOSED ELECTRONICALLY

Definition
Percent Trouble Tickets Closed Electronically

This measures the percent of Customer trouble tickets during the reporting period that are closed electronically by a BellSouth repair technician.

Exclusions
None

Business Rules
The BellSouth technician electronically closes out the trouble. This metric measures the percent of the customer trouble tickets that are closed electronically by a BellSouth repair technician.

Calculation

Percent of Customer Trouble Tickets Closed Electronically = (a ÷ b) x 100

- a = Number of Customer Trouble Tickets closed electronically
- b = Total number of Customer Trouble Tickets closed during the reporting period

Report Structure
- CLEC Specific
- CLEC Aggregate

Data Retained
- Report Period
- Number of Trouble Tickets Closed
- Number of Trouble Tickets Closed Electronically

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
State	

SEEM Measure

SEEM Measure		
	Tier I	
	Tier II	
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark

P-7D: Coordinated/Non-Coordinated Customer Conversions – Percent Without Service Disruption

Definition
Measures the percentage of hot cuts that are completed without a loss of service due to BellSouth caused service interruptions outside of the initial customer cutover.

Exclusions
- Cutovers where service outages are due to CLEC-caused reasons when the CLEC agrees
- Cutovers where service outages are due to end-user caused reasons when the CLEC agrees
- (Test Orders)

Business Rules
This report measures service outages associated with Coordinated Customer Conversions and Non-Coordinated Customer Conversions. It measures the quality of BellSouth's conversion process by capturing the number of service disruptions that occur during the cutover process and that are ultimately attributable to BellSouth.

Calculation

Percent Without Service Disruption = (a ÷ b) x 100
- a = Total Number of Coordinated/Non-Coordinated hot cuts that experience service disruption
- b = Total Number of Coordinated/Non-Coordinated hot cuts during the reporting period

Report Structure
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State
  - Region

Data Retained

Relating to CLEC Experience
- Report Month
- CLEC Company Name

Relating to BellSouth Performance
- None

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Unbundled Loops with INP	>= 98% w/o disruption
Unbundled Loops with LNP	>= 98% w/o disruption

SEEM Measure

SEEM Measure		
	Tier I	
	Tier II	
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark

P-14: Percent Batch Hot Cuts Started on Time

Definition
Measures the percentage of time that BellSouth begins performing batch hot cuts within 15 minutes of the committed start time.

Exclusions
- Batches starting early or late due to CLEC-caused reasons when the CLEC agrees
- Batches starting early or late due to end-user caused reasons when the CLEC agrees
- (Test Orders)

Business Rules
The CLEC Bulk Migration process includes the submission of a Bulk Migration Notification Form to BellSouth via e-mail. The project manager negotiates a Due Date, assigns a Bulk Order Package Identification (BOPI) number, and validates related PONs in the bulk package. BellSouth then returns the Bulk Notification Form to the CLEC, which includes the negotiated Due Date and the committed Start Time Beginning in October, 2004 this process will be available electronically via the Batch Scheduler.

Calculation

Percent Batch Hot Cuts Started On Time = (a ÷ b) x 100
- a = Total Number of batch hot cuts that began within 15 minutes of the committed start time
- b = Total Number of batch hot cuts performed during the reporting period

Report Structure
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
    - State
    - Region

Data Retained

Relating to CLEC Experience
- Report Month
- LEC Company Name

Relating to BellSouth Performance
- None

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Batches	>= 98% started on time

SEEM Measure

SEEM Measure		
	Tier I	X
	Tier II	X
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Batches	>= 98% started on time

APPENDIX B

SQM CHANGES

METRIC	PROBLEM	RECOMMENDATION
FOC Timeliness	Currently, CLECs cannot inform customers of their service date. Additionally, CLECs cannot even provide a forecast as to when a due date will be determined. Project sized orders do not have fixed intervals for receipt of a FOC.	Analog Benchmark: CLECs recommend that project managed LNP Only orders be assigned a fixed interval for receipt of a FOC. Additionally, AT&T also requests that project managed LNP Only orders no longer be excluded from this metric. AT&T is requesting the following interval: Standard FOC Intervals For Number Porting: - 1 to 10 in 24 hours - 10 to 999 in 48 hours Exclusion: LSR identified as "Projects" with the exception of LNP(Standalone) and batch hot cuts. Analog Benchmark/ Disaggregation: LNP Standalone(Projects) 95% within 24 hours(1-10 numbers) 95% within 48 hours(11-999 numbers) SEEM Disaggregation/Analog Benchmark:

		LNP Standalone(Projects) 95% within 24 hours(1-10 numbers) 95% within 48 hours(11-999 numbers)
Appendix D OSS Interface Availability	The Batch Scheduler provides a tentative due date for a batch hot cut. (To be implemented in October 04)	Add Batch Scheduler as an OSS under OSS Interface
	EXACT is the OSS system used to request Interconnection Trunks & to receive appropriate order status.	Add EXACT as an OSS under OSS Interface
	SGG replaced SOG and DOM.	Add SGG as an OSS under OSS Interface
	The DSL systems required to provision, order & maintain customers are currently not being measured. These systems, which includes SOEG, LMU and LQS, should be added to the OSS Availability metric.	Add SOEG, LMU & LQS as OSS's under OSS Interface .
Flow-through	Given the vacatur of the TRO, UNE-L may take on a more vital role in providing telephone service to mass market customers. As such, it is critical that UNE-L orders be processed as efficiently in the future as UNE-P orders are currently.	Analog Benchmark Disaggregation: UNE –L 95% LNP 95% UNE-L with LNP 95% SEEM Disaggregation/Analog Benchmark: UNE-L with LNP to be reported separately

		SEEM Disaggregation UNE –L 95% LNP 95% UNE-L with LNP 95%
Percent Rejected Service Requests	The batch hot cut should be measured because it is likely to become the primary customer acquisition vehicle for UNE-L with LNP in the near future.	Exclusion: LSR identified as "Projects" with the exception of batch hot cuts.
Reject Interval	The batch hot cut should be measured because it is likely to become the primary customer acquisition vehicle for UNE-L with LNP in the near future.	Exclusion: LSR identified as "Projects" with the exception of batch hot cuts.
FOC & Reject Response Completeness	The batch hot cut should be measured because it is likely to become the primary customer acquisition vehicle for UNE-L with LNP in the near future.	Exclusion: LSR identified as "Projects" with the exception of batch hot cuts.
Coordinated Customer Conversion Interval	Make notification of completion of cut to the CLEC as the end-point as the CLEC is unable to port the number until the notification is received. BellSouth's current performance is 2.39 minutes for the loop cutover and 5 minutes to contact CLECs for a total of 7.39 minutes. As minimal service outage is equally important for customers of non-coordinated service as	Business Rules: The endpoint is the notification to the CLEC that the cut is complete. Definition: Replace Coordinated with "Coordinated or Non-coordinated" Replace "and cross connect it to CLEC equipment "with Notification of completed Cut" Analog/Benchmark: Change benchmark to 95%

	those of coordinated service, this metric should include non-coordinated hot cuts. All references to Coordinated Customer Conversion should be changed to Coordinated Non-Coordinated Customer Conversion.	in 10 minutes. Metric Name: Coordinated/Non-Coordinated Customer Conversion Interval Calculation: See Appendix B SEEMAnalog/Benchmarks: Change Benchmmark to 95% in 10 minutes
Average Completion Interval(OCI)	The batch hot cut should be measured because it is likely to become the primary customer acquisition vehicle for UNE-L with LNP in the near future. Add a new level of disaggregation and designated benchmark.	SQM Disaggregation: Batch Hot Cuts SQM Benchmark: Batch Hot Cuts – 98% in 5 Days SEEM Disaggrgation-Analog/Benchmark: Batch Hot Cuts – 98% in 5 Days
Coordinated Customer Conversion – Average Recovery Time	As minimal service outage is equally important for customers of non-coordinated service as those of coordinated service, this metric should include non-coordinated hot cuts. All references to Coordinated Customer Conversion should be changed to Coordinated Non-	Metric Name: Coordinated/Non-Coordinated Customer Conversion – Average Recovery Interval Business Rules: Change Coordinated to Coordinated/Non-Coordinated Benchmark:

	Coordinated Customer Conversion. Given the dependence of this service for mass market customers, the benchmark should be modified.	Unbundled Loop with LNP <= 2 hours Unbundled Loop with INP <= 2 hours SEEM Measure Yes Tier 1 Tier 2 SEEM Disaggregation - Analog/Benchmark Unbundled Loop with LNP <= 2 hours Unbundled Loop with INP <= 2 hours
Hot Cut Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order	As minimal service outage s equally important for customers of non-coordinated service as those of coordinated service, this metric should include non-coordinated hot cuts. All references to Coordinated Customer Conversion should be changed to Coordinated/Non-Coordinated Customer Conversion.	Definition: Replace Coordinated Customer conversion with Coordinated Customer Coversion (CCC) Business Rule: Replace Coordinated with Non-coordinated Calculation: Replace CCC with CCC and NCCC
Trunk Blockage	CLECs have proposed a change in BST's current notification process when it plans to take a trunk blockage exclusion. Currently, BellSouth sends the notice to Carrier Relations via a fax. This causes delays in responding to claims that the excluded data is from	Business Rules: Add phrase in brackets: the CLEC ['s traffic planning group or reprentative via email] when such blocking

	one of the CLEC caused situations. An email to the traffic engineer would provide a more direct and timely route to question the assumption that this is the CLEC's fault.	
Usage Data Delivery Timeliness Average Time to Deliver Usage	CLEC propose modifying this metric to make clear that non-completed call usage is not to be counted in the metric. CLECs have experienced that where states allow a usage transmission charge that it is receiving high quantities of uncompleted call records that would not only raise those charges based on the number of records transmitted but inflate metrics and hide problems in receiving billable usage. The business rule change makes clear the type of billable usage, particularly third party, that should be covered in this metric.	Exclusions: Non-completed calls. Business Rules: The usage data to be covered by this metric not only involves CLEC customer usage, but also the following ADUF (access daily usage file) for EMI transmissions, or 11-01-xx) record types needed to bill third parties. - The 11 designates Carrier Access Usage - The 01 designates Originating and Terminating - The last two digits specifically identify the traffic type: 01 – Message Telephone Service (this is typically orig and term LD traffic) 02 – Outwats 05 – Originating 800 16 – Information Service Provider (e.g. 976) 20 – FGD Terminating Access

		25 – 800 data base service 26 – Originating 500 access 31 – local telephone service (this is terminating recio comp records) 32 – DA
Percent of Change Requests Implemented Within Weeks Of Prioritization	The Change Control Process currently governs both the changes to the OSS interfaces, and the manual process which support them (See CCP V.4.0 Introduction) However, the SQM currently only measures the implementation interval of CRs implemented through software releases. Process change requests are not currently included. A more timely interval is needed for process change.	Analog Benchmark Add performance standard 95% within 60 days for implementation of "process" change requests Title: Change title to Percent Change Requests Implemented Within the Specified Interval Business Rules: See Appendix B

O-9: Firm Order Confirmation Timeliness

Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of valid LSR or ASR to distribution of a Firm Order Confirmation. The interval will include an electronic facilities check.

Exclusions

Service Requests canceled by CLEC prior to being confirmed.
Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs ASRs only
LSRs which are identified and classified as "Projects" with the exception of LNP(Standalone) and patch hot cuts

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

For ASRs processed in the Local Interconnection Service Center (LISC) - From 4:30 PM ALL hours outside of Monday – Friday 8:00 AM – 4:30 PM CST, should be excluded

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

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

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

Business Rules

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI translator or TAG.

Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, or TAG) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via EDI translator, or TAG.

Non-Mechanized: The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation

Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Local Interconnection Service Center (LISC). The elapsed time is measured from receipt of a valid ASR (date and time stamp of a FAX or paper ASR received in the LISC) until the appropriate orders are issued by a BellSouth representative and a FOC issued in EXACT. Trunk data is reported as a separate category.

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

Calculation

Firm Order Confirmation Interval = (a - b)

a = Date and Time of Firm Order Confirmation
b = Date and Time of Service Request Receipt

Average FOC Interval = (c / d)

c = Sum of all Firm Order Confirmation Times
d = Number of Service Requests Confirmed in Reporting Period

FOC Interval Distribution = (e / f) X 100

e = Service Requests Confirmed in Designated Interval
f = Total Service Requests Confirmed in the Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Non-Mechanized
- CLEC Specific
- CLEC Aggregate

Geographic Scope
- State
- Region

Fully Mechanized:
0 - <= 15 minutes
> 15 - <= 30 minutes
> 30 - <= 45 minutes
> 45 - <= 60 minutes
> 60 - <= 90 minutes
> 90 - <= 120 minutes
> 120 - <= 180 minutes
0 - <= 3 hours
> 3 - <= 6 hours
> 6 - <= 12 hours
> 12 - <= 24 hours
> 24 - <= 48 hours
> 48 hours

Partially Mechanized:
0 - <= 4 hours
> 4 - <= 8 hours
> 8 - <= 10 hours
0 - <= 10 hours
> 10 - <= 18 hours
0 - <= 18 hours
> 18 - <= 24 hours
> 24 - <= 48 hours
> 48 hours

Non-mechanized:
0 - <= 4 hours
> 4 - <= 8 hours
> 8 - <= 12 hours
> 12 - <= 16 hours
0 - <= 24 hours
> 16 - <= 20 hours

> 20 - <= 24 hours
> 24 - <= 36 hours
0 - <= 36 hours
> 36 - <= 48 hours
> 48 hours

Trunks:
0 - <= 48 hours
> 48 hours

Average Interval is reported in business hours

Data Retained

Relating to CLEC Experience

Report Month
Interval for FOC
Total Number of LSRs
State and Region
Total Number of ASRs (Trunks)

Relating to BellSouth Performance

Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- Resale – Residence	Fully Mechanized: 95% <= 3 Hours
- Resale – Business	Partially Mechanized: 95% <= 10 Hours
- Resale – Design (Special)	Non-Mechanized: 95% <= 24 Hours
- Resale PBX	
Resale Centrex	
Resale ISDN	
LNP (Standalone)	
INP (Standalone)	
2W Analog Loop Design	
2W Analog Loop Non-Design	
2W Analog Loop with INP Design	
2W Analog Loop with INP Non-Design	
2W Analog Loop with LNP Design	
2W Analog Loop with LNP Non-Design	
- UNE Digital Loop < DS1	
- UNE Digital Loop >= DS1	
- UNE Loop – Port Combinations	
- UNE Combination Other	
- UNE ISDN Loop	
UNE Other Design	
UNE Other Non-Design	
UNE Line Splitting	

- EELs
- Switch Ports
- UNE xDSL (ADSL, HDSL, UCL)
- Line Sharing
- Local Interoffice Transport
- Local Interconnection Trunks.....Trunks: 95% <= 48 Hours
- LNP(Standalone Projects) 95% within 24 hours(1 – 10 numbers)
  95% within 48 hours(11 – 999 numbers)

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- Fully Mechanized 95% <= 3 Hours	
- Partially Mechanized 95% <= 10 Hours	
- Non-Mechanized 95% <= 24 Hours	
- Local Interconnection Trunks	95% <= 48 Hours
- LNP(Standalone Projects)	95% within 24 hours(1 - 10 numbers)
-	95% within 48 hours(11 - 999 numbers)

OSS-2: OSS
Availability (Pre-Ordering/Ordering)

OSS Availability

OSS Interface	Applicable to	% Availability
EDI	CLEC	x
LENS	CLEC	x
LEO	CLEC	x
LESOG	CLEC	x
PSIMS	CLEC	x
TAG	CLEC	x
LNP Gateway	CLEC	x
COG	CLEC	x
SOG	CLEC	x
DOM	CLEC	x
Batch Scheduler	CLEC	x
EXACT	CLEC	x
SGG	CLEC	x
SOEG	CLEC	x
LMU	CLEC	x
LQS	CLEC	x
DOE	CLEC/BellSouth	x
CRIS	CLEC/BellSouth	x
ATLAS/COFFI	CLEC/BellSouth	x
BOCRIS	CLEC/BellSouth	x
DSAP	CLEC/BellSouth	x
RSAG	CLEC/BellSouth	x
SOCS	CLEC/BellSouth	x
SONGS	CLEC/BellSouth	x
RNS	BellSouth	x

ROS ..... BellSouth x

OSS-2: OSS Availability (Pre-Ordering/Ordering)

SEEM OSS Availability

OSS Interface	Applicable to	% Availability
EDI	CLEC	x
LENS	CLEC	x
LEO	CLEC	x
LESOG	CLEC	x
PSIMS	CLEC	x
TAG	CLEC	x
LNP Gateway	CLEC	x
COG	CLEC	x
SOG	CLEC	x
DOM	CLEC	x
Batch Scheduler		**CLEC**
EXACT	CLEC	x
SGG	CLEC	x
SOEG	CLEC	x
LMU	CLEC	x
LQS	CLEC	x

O-4: Percent Flow-Through Service Requests (Detail)

Definition

A detailed list, by CLEC, of the percentage of Local Service Requests (LSR) and LNP Local Service Requests (LNP LSRs) submitted electronically via the CLEC mechanized ordering process that flow through and reach a status for a FOC to be issued, without manual or human intervention.

Exclusions

Fatal Rejects
Auto Clarification
Manual Fallout for Percent Flow-Through only
CLEC System Fallout
Scheduled OSS Maintenance

Business Rules

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued, without manual intervention. These LSRs can be divided into two classes of service: Business and Residence, and two types of service: Resale, and Unbundled Network Elements (UNE). 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, Manual Fallout.)

Definitions:

Fatal Rejects: Errors that prevent an LSR, submitted electronically by the CLEC, from being processed further. When an LSR is submitted by a CLEC, LEO/LNP Gateway will perform edit checks to ensure the data received is correctly formatted and complete. For example, if the PON field contains an invalid character, LEO/LNP Gateway will reject the LSR and the CLEC will receive a Fatal Reject.

Auto-Clarification: Clarifications that occur due to invalid data within the LSR. LESOG LAUTO will perform data validity checks to ensure the data within the LSR is correct and valid. For example, if the address on the LSR is not valid according to RSAG, or if the LNP is not available for the NPA NXX requested, the CLEC will receive an Auto-Clarification.

Manual Fallout: Planned Fallout that occur by design. Certain LSRs are designed to fallout of the Mechanized Order Process due to their complexity. These LSRs are manually processed by the LCSC. When a CLEC submits an LSR, LESOG/LAUTO will determine if the LSR should be forwarded to LCSC for manual handling. Following are the categories for Manual Fallout:

1. Complex*
2 Special pricing plans
3. Some Partial migrations (All LNP Partial Migrations)
4. New telephone number not yet posted to BOCRIS
5. Pending order review required
6. CSR inaccuracies such as invalid or missing CSR data in CRIS
7. Expedites (requested by the CLEC)

8. Denials-restore and conversion, or disconnect and conversion orders
9. Class of service invalid in certain states with some types of service
10. Low volume such as activity type "T" (move)
11. More than 25 business lines, or more than 15 loops
12. Transfer of calls option for the CLEC end users
13. Directory Listings (Identions and Captions)
14. LNP Only – Supplement LSRs except supps of O-2 (Due Date Changes) on Req Type CB

*See LSR Flow-Through Matrix in Appendix E for a list of services, including complex services, and whether LSRs issued for the services are eligible to flow through. The matrix is updated automatically when new services are added or the systems are improved to allow a service to flow through. The current version of the Flow-Through Matrix is on the PMAP website (http://pmap.bellsouth.com) in the Documentation Exhibits folder. Any change in the flow-through order category from flow-through to non-flow-through shall require prior Commission approval.

Total System Fallout: Errors that require manual review by the LCSC to determine if the error is caused by the CLEC, or is due to BellSouth system functionality. If it is determined the error is caused by the CLEC, the LSR will be sent back to the CLEC for clarification. If it is determined the error is BellSouth caused, the LCSC representative will correct the error, and the LSR will continue to be processed.

Z Status: LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR.

Calculation

Percent Flow Through = a / [b - (c + d + e + f)] X 100

a = the total number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued
b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
c = the number of LSRs that fallout for manual processing
d = the number of LSRs that are returned to the CLEC for auto clarification
e = the number of LSRs that are returned to the CLEC from the LCSC due to CLEC clarification
f = the number of LSRs that receive a Z status.

Percent Achieved Flow Through = a / [b - (c + d + e)] X 100

a = the number of LSRs that flow through LESOG/LAUTO and reach a status for a FOC to be issued
b = the number of LSRs passed from LEO/LNP Gateway to LESOG/LAUTO
c = the number of LSRs that are returned to the CLEC for auto clarification
d = the number of LSRs that are returned to the CLEC from the LCSC due to CLEC clarification
e = the number of LSRs that receive Z status

Report Structure

Provides the flow through percentage for each CLEC (by alias designation) submitting LSRs through the CLEC mechanized ordering process. The report provides the following:

CLEC (by alias designation)

Number of fatal rejects
Mechanized interface used
Total mechanized LSRs
Total manual fallout
Number of auto clarifications returned to CLEC
Number of validated LSRs
Number of BellSouth caused fallout
Number of CLEC caused fallout
Number of Service Orders Issued
Base calculation
CLEC error excluded calculation
Region

Data Retained

Relating to CLEC Experience

Report Month
Total Number of LSRs Received, by Interface, by CLEC
- TAG
- EDI
- LENS

Total Number of Errors by Type, by CLEC
- Fatal Rejects
- Auto Clarification
- CLEC Errors

Total Number of Errors by Error Code
Total Fallout for Manual Processing

Relating to BellSouth Performance

Report Month
Total Number of Errors by Type
- BellSouth System Error

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	**SQM Analog/Benchmark[a]**
- Residence	Benchmark: 95%
- Business	Benchmark: 90%
- UNE - Loops	Benchmark: ~~85%~~95%
- UNE-P	Benchmark: 90%
- LNP	Benchmark: ~~85%~~95%
- UNE-Loops with LNP	Benchmark: 95%

SEEM Measure

SEEM	**Tier I**	**Tier II**
Yes	X	

[a] *Benchmarks do not apply to the "Percent Achieved Flow-Through."*

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	**SEEM Analog/Benchmark**
- Residence	Benchmark: 95%
- Business	Benchmark: 90%
- UNE- Loops	Benchmark: ~~85%~~95%
- UNE-P	Benchmark: 90%
- LNP	Benchmark: ~~85%~~95%
- UNE-Loops with LNP	Benchmark: 95%

O-7: Percent Rejected Service Requests

Definition

Percent Rejected Service Request is the percent of total Service Requests [(Local Service Requests (LSRs) or Access Service Requests (ASRs)] received which are rejected due to error or omission. Service Requests are considered valid when they are submitted by the CLEC and pass edit checks to insure the data received is correctly formatted and complete.

Exclusions

Service Requests canceled by the CLEC prior to being rejected clarified.
Fatal Rejects
Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc.) where identifiable
LSRs identified as "Projects" with the exception of batch hotcuts.

Business Rules

Fully Mechanized: An LSR/Service Request is considered "rejected" when it is submitted electronically but does not pass edit checks in the ordering systems (EDI, LENS, TAG, LESOG, LNP Gateway, LAUTO) and is returned to the CLEC without manual intervention. There are two types of "Rejects" in the Mechanized category:

A **Fatal Reject** occurs when a CLEC attempts to electronically submit an LSR but required fields are either not populated or incorrectly populated and the request is returned to the CLEC before it is considered a valid LSR.

Fatal rejects are reported in a separate column, and for informational purposes ONLY. They are not considered in the calculation of the percent of total LSRs rejected or the total number of rejected LSRs.

An **Auto Clarification** occurs when a valid LSR is electronically submitted but rejected from LESOG or LAUTO because it does not pass further edit checks for order accuracy.

Partially Mechanized: A valid LSR, which is electronically submitted (via EDI, LENS, TAG) but cannot be processed electronically and "falls out" for manual handling. It is then put into "clarification" and sent back (rejected) to the CLEC.

Non-Mechanized: LSRs which are faxed or mailed to the LCSC for processing and "clarified" (rejected) back to the CLEC by the BellSouth service representative.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Local Interconnection Service Center (LISC). Trunk data is reported as a separate category.

Calculation

Percent Rejected Service Requests = (a / b) X 100

a = Total Number of Service Requests Rejected in the reporting period
b = Total Number of Service Requests Received in the reporting period

Report Structure

Fully Mechanized, Partially Mechanized, Non-Mechanized
Trunks
CLEC Specific
CLEC Aggregate
Geographic Scope
- State
- Region

Product Specific percent Rejected
Total percent Rejected

Data Retained

Relating to CLEC Experience

Report Month
Total Number of LSRs
Total Number of Rejects
State and Region
Total Number of ASRs (Trunks)

Relating to BellSouth Performance

Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	**SQM Analog/Benchmark**
Mechanized, Partially Mechanized and Non-Mechanized	
- Resale – Residence	Diagnostic
- Resale - Business	
- Resale – Design (Special)	
- Resale PBX	
- Resale Centrex	
- Resale ISDN	
- LNP (Standalone)	
- INP (Standalone)	
- 2W Analog Loop Design	
- 2W Analog Loop Non-Design	
- 2W Analog Loop with INP Design	
- 2W Analog Loop with INP Non-Design	
- 2W Analog Loop with LNP Design	
- 2W Analog Loop with LNP Non-Design	
- UNE Digital Loop < DS1	
- UNE Digital Loop >= DS1	
- UNE Loop + Port Combinations	
- UNE Combination Other	

- UNE ISDN Loop
- UNE Other Design
- UNE Other Non-Design
  UNE Line Splitting
- EELs
  Switch Ports
- UNE xDSL (ADSL, HDSL, UCL)
  Line Sharing
  Local Interoffice Transport
  Local Interconnection Trunks

SEEM Measure

SEEM	Tier I	Tier II
No	.....	.....

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- Not Applicable	Not Applicable

O-8: Reject Interval

Definition

Reject Interval is the average reject time from receipt of Service Requests [(Local Service Requests (LSRs) or Access Service Requests (ASRs)] to the distribution of a Reject. Service Requests are considered valid when they are submitted by the CLEC and pass edit checks to insure the data received is correctly formatted and complete. When there are multiple rejects on a single version of an LSR, the first reject issued is used for the calculation of the interval duration.

Exclusions

Service Requests canceled by CLEC prior to being rejected/clarified.
Fatal Rejects
Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only.
LSRs which are identified and classified as "Projects" with the exception of batch hotcuts.

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

Local Interconnection Service Center (LISC) - Monday through Friday 4:30 PM until 8:00 AM
From 4:30 PM Friday until 8:00 AM Monday

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

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

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

Business Rules

The Reject interval is determined for each rejected LSR processed during the reporting period. The Reject interval is the elapsed time from when BellSouth receives LSR (date and time stamps in EDI or TAG) until that LSR is rejected back to the CLEC. Elapsed time for each LSR (date and time stamps in EDI or TAG) is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of rejected LSRs to produce the reject interval distribution.

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI translator or TAG) until the LSR is rejected (date and time stamp or reject in EDI translator, or TAG). Auto Clarifications are considered in the Fully Mechanized category.

Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI translator or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via EDI translator, or TAG.

Non-Mechanized: The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via LON.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Local Interconnection Service Center (LISC). Trunk data is reported as a separate category.

Calculation

Reject Interval = (a - b)

a = Date and Time of Service Request Rejection
b = Date and Time of Service Request Receipt

Average Reject Interval = (c / d)

c = Sum of all Reject Intervals
d = Number of Service Requests Rejected in Reporting Period

Reject Interval Distribution = (e / f) X 100

e = Service Requests Rejected in reported interval
f = Total Number of Service Requests Rejected in Reporting Period

Report Structure

Fully Mechanized, Partially Mechanized, Non-Mechanized
CLEC Specific
CLEC Aggregate
Geographic Scope
- State
- Region

Fully Mechanized:
0 - <= 4 minutes
> 4 - <= 8 minutes
>8 - <= 12 minutes
> 12 - <= 60 minutes
0 - <= 1 hour
> 1 - <= 4 hours
> 4 - <= 8 hours
> 8 - <= 12 hours
> 12 - <= 16 hours
> 16 - <= 20 hours
> 20 - <= 24 hours
> 24 hours

Partially Mechanized:
0 - <= 1 hour
> 1 - <= 4 hours
> 4 - <= 8 hours
> 8 - <= 10 hours
0 - <= 10 hours
> 10 - <= 18 hours
0 - <= 18 hours
> 18 - <= 24 hours
> 24 hours

Non-mechanized:
0 - <= 1 hour
> 1 - <= 4 hours
> 4 - <= 8 hours
> 8 - <= 12 hours
> 12 - <= 16 hours
> 16 - <= 20 hours

> 20 - <= 24 hours
0 - <= 24 hours
> 24 hours

Trunks:
0 - <= 36 hours
> 36 hours

Average Interval is reported in business hours.

Data Retained

Relating to CLEC Experience

Report Month
Reject Interval
Total Number of LSRs
Total Number of Rejects
State and Region
Total Number of ASRs (Trunks)

Relating to BellSouth Performance

Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- Resale – Residence	Fully Mechanized: 97% <= 1 Hour
- Resale – Business	Partially Mechanized: 95% <= 10 Hours
- Resale – Design (Special)	Non Mechanized: 95% <= 24 Hours
- Resale PBX	
- Resale Centrex	
- Resale ISDN	
- LNP (Standalone)	
- INP (Standalone)	
- 2W Analog Loop Design	
- 2W Analog Loop Non-Design	
- 2W Analog Loop with INP Design	
- 2W Analog Loop with INP Non-Design	
- 2W Analog Loop with LNP Design	
- 2W Analog Loop with LNP Non-Design	
- UNE Digital Loop < DS1	
- UNE Digital Loop >= DS1	
- UNE Loop + Port Combinations	
- UNE Combination Other	
- UNE ISDN Loop	
- UNE Other Design	
- UNE Other Non-Design	
- UNE Line Splitting	
- EELs	

Switch Ports
UNE xDSL (ADSL, HDSL, UCL)
Line Sharing
Local Interoffice Transport
Local Interconnection Trunks.....Trunks: 95% <= 36 Hours

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- Fully Mechanized	97% <= 1 hour
- Partially Mechanized	95% <= 10 hours
- Non-Mechanized	95% <= 24 hours
Local Interconnection Trunks	95% <= 36 hours

O-11: Firm Order Confirmation and Reject Response Completeness

Definition

A response is expected from BellSouth for every Local Service Request transaction (version). Firm Order Confirmation and Reject Response Completeness is the corresponding number of Local Service Requests received to the combination of Firm Order Confirmation and Reject Responses.

Exclusions

Service Requests canceled by the CLEC prior to FOC or Rejected Clarified
Fatal Rejects
LSRs identified as "Projects" with the exception of Batch Hot Cuts

Business Rules

Mechanized – The number of FOCs or Auto Clarifications sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs.

Partially Mechanized – The number of FOCs or Rejects sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs which fall out for manual handling by the LCSC personnel.

Non-Mechanized: The number of FOCs or Rejects sent to the CLECs by FAX server.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Local Interconnection Service Center (LISC). Trunk data is reported as a separate category.

For CLEC Results:

Percent responses is determined by computing the number of Firm Order Confirmations and Rejects transmitted by BellSouth and dividing by the number of Local Service Requests (all versions) received in the reporting period.

Calculation

Firm Order Confirmation / Reject Response Completeness = (a b) X 100

a = Total Number of Service Requests for which a Firm Order Confirmation or Reject is Sent
b = Total Number of Service Requests Received in the Report Period

Report Structure

Fully Mechanized, Partially Mechanized, Non-Mechanized and Interconnection Trunks

State and Region
CLEC Specific
CLEC Aggregate

Data Retained

Relating to CLEC Experience

Report Month
Total Number of LSRs
Total Number of rejects
Total Number of ASRs (Trunks)
Total Number of FOCs

Relating to BellSouth Performance

Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- Resale Residence	95% Returned
- Resale Business	
- Resale Design (Special)	
- Resale PBX	
- Resale Centrex	
- Resale ISDN	
- LNP (Standalone)	
- INP (Standalone)	
- 2W Analog Loop Design	
- 2W Analog Loop Non-Design	
- 2W Analog Loop with INP Design	
- 2W Analog Loop with INP Non-Design	
- 2W Analog Loop with LNP Design	
- 2W Analog Loop with LNP Non-Design	
- UNE Digital Loop < DS1	
- UNE Digital Loop >= DS1	
- UNE Loop + Port Combinations	
- UNE Combination Other	
- UNE ISDN Loop	
- UNE Other Design	
- UNE Other Non-Design	
- UNE Line Splitting	
- EELs	
- Switch Ports	
- UNE xDSL (ADSL, HDSL, UCL)	
- Line Sharing	
- Local Interoffice Transport	
- Local Interconnection Trunks	

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation

- Fully Mechanized 95% Returned
- Partially Mechanized
- Non-Mechanized
- Local Interconnection Trunks

SEEM Analog/Benchmark

O-11: Firm Order Confirmation and Reject Response Completeness

Definition

A response is expected from BellSouth for every Local Service Request transaction (version). Firm Order Confirmation and Reject Response Completeness is the corresponding number of Local Service Requests received to the combination of Firm Order Confirmation and Reject Responses.

Exclusions

Service Requests canceled by the CLEC prior to FOC or Rejected/Clarified
Fatal Rejects
LSRs identified as "Projects" with the exception of batch hot cuts.

Business Rules

Mechanized – The number of FOCs or Auto Clarifications sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs.

Partially Mechanized – The number of FOCs or Rejects sent to the CLEC from EDI, or TAG in response to electronically submitted LSRs which fall out for manual handling by the LCSC personnel.

Non-Mechanized: The number of FOCs or Rejects sent to the CLECs by FAX server.

Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Local Interconnection Service Center (LISC). Trunk data is reported as a separate category.

For CLEC Results:

Percent responses is determined by computing the number of Firm Order Confirmations and Rejects transmitted by BellSouth and dividing by the number of Local Service Requests (all versions) received in the reporting period.

Calculation

Firm Order Confirmation / Reject Response Completeness = (a / b) X 100

a = Total Number of Service Requests for which a Firm Order Confirmation or Reject is Sent
b = Total Number of Service Requests Received in the Report Period

Report Structure

Fully Mechanized, Partially Mechanized, Non-Mechanized and Interconnection Trunks

State and Region
CLEC Specific
CLEC Aggregate

Data Retained

Relating to CLEC Experience

Report Month
Total Number of LSRs
Total Number of rejects
Total Number of ASRs (Trunks)
Total Number of FOCs

Relating to BellSouth Performance

Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
Resale Residence	95% Returned
Resale Business	
Resale Design (Special)	
Resale PBX	
Resale Centrex	
- Resale ISDN	
LNP (Standalone)	
INP (Standalone)	
2W Analog Loop Design	
- 2W Analog Loop Non-Design	
2W Analog Loop with INP Design	
2W Analog Loop with INP Non-Design	
2W Analog Loop with LNP Design	
- 2W Analog Loop with LNP Non-Design	
UNE Digital Loop < DS1	
UNE Digital Loop >= DS1	
UNE Loop + Port Combinations	
UNE Combination Other	
- UNE ISDN Loop	
UNE Other Design	
UNE Other Non-Design	
- UNE Line Splitting	
EELs	
Switch Ports	
UNE xDSL (ADSL, HDSL, UCL)	
- Line Sharing	
Local Interoffice Transport	
Local Interconnection Trunks	

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- Fully Mechanized 95% Returned	
- Partially Mechanized	
- Non-Mechanized	
- Local Interconnection Trunks	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- Fully Mechanized	95% <= 3 Hours
- Partially Mechanized	95% <= 10 Hours
- Non-Mechanized	95% <= 24 Hours
- Local Interconnection Trunks	95% <= 48 Hours

P-7: Coordinated/Non-Coordinated Customer Conversions Interval

Definition

This report measures the average time it takes BellSouth to disconnect an unbundled loop from the BellSouth switch and cross connect it to CLEC equipment. This measurement applies to service orders with INP and LNP, and where the CLEC has requested BellSouth to provide a coordinated or non-coordinated cutover.

Exclusions

Any order canceled by the CLEC will be excluded from this measurement.
Delays due to CLEC following disconnection of the unbundled loop
Unbundled Loops where there is no existing subscriber loop ~~and loops where coordination is not requested~~.

Business Rules

Where the service order includes LNP, the interval includes the total time for the cutover including the translation time to place the line back in service on the ported line and notify the CLEC of completion of the cut. When the service order includes INP, the interval includes the total time for the cutover including the translation time to place the link back in service on the ported line. The interval is calculated for the entire cutover time for the service order and then divided by items worked in that time to give the average per-item interval for each service order.

Calculation

Coordinated/Non-Coordinated Customer Conversions Interval = (a - b)

a = Completion Date and Time for Cross Connection of a Coordinated Non-coordinated Unbundled Loop and Notification of Completion of Cut to the CLEC
b = Disconnection Date and Time of an Coordinated Non-coordinated Unbundled Loop

Percent Coordinated/Non-Coordinated Customer Conversions (for each interval) = (c ÷ d) X 100

c = Total number of Coordinated/Non-Coordinated Customer Conversions for each interval
d = Total Number of Unbundled Loop with Coordinated/Non-Coordinated Conversions (items) for the reporting period

Report Structure

CLEC Specific
CLEC Aggregate
The interval breakout is 0-5 = 0-<=5, 5-15 = >5-<=15, >=15 = 15 and greater, plus Overall Average Interval

Geographic Scope
- State
- Region

Data Retained

Relating to CLEC Experience

Report Month
CLEC Order Number
Committed Due Date (DD)
Service Type (CLASS_SVC_DESC)
Cutover Start Time
Cutover Completion time
Portability Start and Completion Times (INP orders)
Total Conversions (Items)

Note: Code in parentheses is the corresponding header found in the raw data file.

Relating to BellSouth Performance

No BellSouth Analog Exists

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- Unbundled Loops with INP	95% <= ~~15~~ 10 minutes
- Unbundled Loops with LNP	95% <= 10 ~~15~~ minutes

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- Unbundled Loops With INP	95% <= 15 minutes
- Unbundled Loops With LNP	95% <= ~~15~~ 10 minutes

P-4: Average Completion Interval (OCI) & Order Completion Interval Distribution

Definition

The "average completion interval" measure monitors the interval of time it takes BellSouth to provide service for the CLEC or its own customers. The "Order Completion Interval Distribution" provides the percentages of orders completed within certain time periods. This report measures how well BellSouth meets the interval offered to customers on service orders.

Exclusions

Canceled Service Orders
Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.)
Disconnect (D & F) orders (Except "D" orders associated with LNP Standalone)
"L" Appointment coded orders (where the customer has requested a later than offered interval)
End user-caused misses

Business Rules

The actual completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from when BellSouth issues a FOC or SOCS date time stamp receipt of an order from the CLEC to BellSouth's actual order completion date. The clock starts when a valid order number is assigned by SOCS and stops when the technician or system completes the order in SOCS. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

The interval breakout for UNE and Design is: 0-5 = 0-□ 5, 5-10 = 5-□10, 10-15 = 10-□ 15, 15-20 = 15- □ 20, 20-25 = 20-□ 25, 25-30 = 25-□ 30, >= 30 = 30 and greater.

Calculation

Completion Interval = (a - b)

a = Completion Date
b = FOC/SOCS date time-stamp (application date)

Average Completion Interval = (c / d)

c = Sum of all Completion Intervals
d = Count of Orders Completed in Reporting Period

Order Completion Interval Distribution (for each interval) = (e f) X 100

e = Service Orders Completed in "X" days
f = Total Service Orders Completed in Reporting Period

Report Structure

CLEC Specific
CLEC Aggregate
BellSouth Aggregate
Dispatch/Non-Dispatch categories applicable to all levels except trunks
Residence and Business reported in day intervals = 0,1,2,3,4,5,5+
UNE and Design reported in day intervals =0-5,5-10,10-15,15-20,20-25,25-30, >= 30
All Levels are reported <10 line circuits; >= 10 line/circuits (except trunks)
Geographic Scope
- State
- Region

Data Retained

Relating to CLEC Experience

Report Month
CLEC Company Name
Order Number (PON)
Application Date and Time
Completion Date (CMPLTN_DT)
Service Type (CLASS_SVC_DESC)
Geographic Scope

Note: Code in parentheses is the corresponding header found in the raw data file.

Relating to BellSouth Performance

Report Month
BellSouth Order Number
Order Submission Date and Time
Order Completion Date and Time
Service Type
Geographic Scope

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- Resale Residence	Retail Residence
- Resale Business	Retail Business
- Resale Design	Retail Design
- Resale PBX	Retail PBX
- Resale Centrex	Retail Centrex
- Resale ISDN	Retail ISDN

- LNP (Standalone) Retail Residence and Business (POTS)
- INP (Standalone) Retail Residence and Business (POTS)
- 2W Analog Loop Design .....Retail Residence and Business Dispatch
- 2W Analog Loop Non-Design .....Retail Residence and Business - POTS Excluding Switch-Based Orders

2W Analog Loop with LNP - Design .....Retail Residence and Business Dispatch

2W Analog Loop with LNP- Non-Design .....Retail Residence and Business - POTS Excluding Switch-Based Orders

2W Analog Loop with INP-Design .....Retail Residence and Business Dispatch

2W Analog Loop with INP-Non-Design .....Retail Residence and Business - POTS Excluding Switch-Based Orders

UNE Digital Loop < DS1 .....Retail Digital Loop < **DS1**

UNE Digital Loop >= DS1 .....Retail Digital Loop >= DS1

UNE Loop + Port Combinations .....Retail Residence and Business

i. Dispatch In - Dispatch In
ii. Switch Based - Switch Based

UNE Switch Ports Retail Residence and Business (POTS)

UNE Combo Other Retail Residence, Business and Design Dispatch

UNE xDSL (HDSL, ADSL and UCL)

iii. Without Conditioning .....- <= 5 Days
iv. With Conditioning .....- <= 12 Days

UNE ISDN Retail ISDN - BRI

UNE Line Sharing Without Conditioning .....ADSL Provided to Retail

With Conditioning .....<= 12 Days

Local Transport (Unbundled Interoffice Transport) Retail DS1/DS3 Interoffice

- Local Interconnection Trunks .....Parity with Retail
- UNE Line Splitting Without Conditioning .....ADSL Provided to Retail

With Conditioning .....<= 12 Days

- UNE Other Design Retail Design
- UNE Other Non-Design.....Retail Residence and Business
- EELs Retail DS1/DS3
- UNE UDC/IDSL Retail ISDN – BRI
- Batch Hot Cut 98% <= 5 Days

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark

- Resale Residence Retail Residence
- Resale Business Retail Business
- Resale Design Retail Design
- Resale PBX Retail PBX
- Resale Centrex Retail Centrex
- Resale ISDN Retail ISDN
- LNP (Standalone) Retail Residence and Business (POTS)
- INP (Standalone) Retail Residence and Business (POTS)
- 2W Analog Loop Design .....Retail Residence and Business Dispatch
- 2W Analog Loop Non-Design .....Retail Residence and Business – (POTS Excluding Switch-Based Orders)
- 2W Analog Loop with LNP - Design .....Retail Residence and Business Dispatch
- 2W Analog Loop with LNP- Non-Design .....Retail Residence and Business – (POTS Excluding Switch-Based Orders)
- 2W Analog Loop with INP-Design .....Retail Residence and Business Dispatch
- 2W Analog Loop with INP-Non-Design .....Retail Residence and Business – (POTS Excluding Switch-Based Orders)
- UNE Digital Loop < DS1 .....Retail Digital Loop < DS1
- UNE Digital Loop >= DS1 .....Retail Digital Loop >=DS1
- UNE Loop + Port Combinations .....Retail Residence and Business

v. Dispatch In - Dispatch In
vi. Switch Based - Switch Based

- UNE Switch Ports Retail Residence and Business (POTS)
- UNE Combo Other Retail Residence, Business and Design Dispatch
- UNE xDSL (HDSL, ADSL and UCL)

vii. Without Conditioning ..... - <= 5 Days
viii. With Conditioning ..... - <= 12 Days

- UNE ISDN Retail ISDN - BRI
- UNE Line Sharing Without Conditioning .....ADSL Provided to Retail
- With Conditioning .....<= 12 Days
- Local Transport (Unbundled Interoffice Transport) Retail DS1/DS3 Interoffice
- Local Interconnection Trunks .....Parity with Retail
- UNE Line Splitting Without Conditioning.....ADSL Provided to Retail
- With Conditioning .....<= 12 Days
- UNE Other Design Retail Design
- UNE Other Non-Design.....Retail Residence and Business
- EELs Retail DS1/DS3
- UNE UDC/IDSL Retail ISDN/BRI

Batch Hot Cuts.....98% <= 5 Days

P-7B: Coordinated/Non-Coordinated Customer Conversions – Average Recovery Time

Definition

Measures the time between notification and resolution by BellSouth of a service outage found that can be isolated to the BellSouth side of the network. The time between notification and resolution by BellSouth must be measured to ensure that CLEC customers do not experience unjustifiable lengthy service outages during a Coordinated/Non-Coordinated Customer Conversion. This report measures outages associated with Coordinated/Non-Coordinated Customer Conversions, prior to service order completion.

Exclusions

Cutovers where service outages are due to CLEC caused reasons when the CLEC agrees
Cutovers where service outages are due to end-user caused reasons when the CLEC agrees
Test Orders

Business Rules

Measures the outage duration time related to Coordinated/Non-Coordinated Customer Conversions from the initial trouble notification until the trouble has been restored and the CLEC has been notified. The duration time is defined as the time from the initial trouble notification until the trouble has been restored and the CLEC has been notified. The interval is calculated on the total outage time for the circuits divided by the total number of outages restored during the report period to give the average outage duration.

Calculation

Recovery Time = (a - b)

a = Date and Time That Trouble is Closed by CLEC
b = Date and Time Initial Trouble is Opened with BellSouth

Average Recovery Time = (c / d)

c = Sum of all the Recovery Times per circuit
d = Number of Troubles per circuit Referred to BellSouth

Report Structure

CLEC Specific
CLEC Aggregate
Geographic Scope
- State
- Region

Data Retained

Relating to CLEC Experience

Report Month
CLEC Company Name
CLEC Order Number (so_nbr)
Committed Due Date (DD)
Service Type (CLASS_SVC_DESC)
CLEC Acceptance Conflict (CLEC_CONFLICT)
CLEC Conflict Resolved (CLEC_CON_RES)
CLEC Conflict MFC (CLEC_CONFLICT_MFC)
Total Conversion Orders

Note: Code in parentheses is the corresponding header found in the raw data file.

Relating to BellSouth Performance

None

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- Unbundled Loops with INP	<= ~~5~~ 2 Hours
- Unbundled Loops with LNP	<= 52 Hours

SEEM Measure

SEEM	Tier I	Tier II
~~No~~Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- Unbundled Loops with INP	<= ~~5~~ 2 Hours
- Unbundled Loops with LNP	<= 52 Hours

P-7C: Hot Cut Conversions - % Provisioning Troubles Received within 7 Days of a Completed Service Order

Definition

The Percent Provisioning Troubles received within 7 days of a completed service order associated with a Hot Cut Conversion ~~(CCC)~~ measures the quality and accuracy of Coordinated- Customer ~~Conversion~~ Conversion(CCC) and Non-Coordinated Customer Conversion(NCCC) Activities.

Exclusions

Any order cancelled by the CLEC
Troubles caused by Customer Provided Equipment
Test Orders

Business Rules

Measures the quality and accuracy of completed service orders associated with Coordinated/Non-Coordinated Customer Conversions. The first trouble report received on a circuit ID within 7 days following a service order completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate. Reports are calculated searching in the prior report period for completed Coordinated/Non-Coordinated Customer Conversion service orders and following 7 days after the completion of the service order for a trouble report issue date.

Calculation

% Provisioning Troubles within 7 days of service order completion = (a / b) X 100

a = The sum of all CCC and NCCCCircuits Circuits with a trouble within 7 days following service order(s) completion
b = The total number of CCC and NCCC service order circuits completed in the previous report calendar month

Report Structure

CLEC Specific
CLEC Aggregate
Dispatch/Non-Dispatch
Geographic Scope
- State
- Region

Data Retained

Relating to CLEC Experience

Report Month

CLEC Order Number (so_nbr)
PON
Order Submission Date (TICKET_ID)
Order Submission Time (TICKET_ID)
Status Type
Status Notice Date
Standard Order Activity
Geographic Scope
Total Conversion Circuits

Note: Code in parentheses is the corresponding header found in the raw data file.

Relating to BellSouth Performance

No BellSouth Analog exists

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- UNE Loop Design	<= 3%
- UNE Loop Non-Design	<= 3%

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
- UNE Loop Design	<= 3%
- UNE Loop Non-Design	<= 3%

TGP-2: Trunk Group Performance – CLEC Specific

Definition

The Trunk Group Performance report displays, over a reporting cycle, CLEC specific, average trunk group blocking data for each hour of each day of the reporting cycle, for both CLEC affecting and BellSouth affecting trunk groups.

Exclusions

- Trunk Groups blocked due to unanticipated significant increase in CLEC traffic
- Orders that are delayed or refused by CLEC
- Trunk Groups for which there was no valid data available for an entire study period
- Duplicate trunk group information
- Trunk Groups blocked due to CLEC network equipment failure
- Final Groups actually overflowing not blocked

Business Rules

The purpose of the Trunk Group Performance Report is to provide trunk blocking measurements on CLEC and BellSouth trunk groups for comparison only. It is not the intent of the report that it be used for network management and/or engineering. BellSouth should notify the CLEC 's traffic planning group or representative via email when such blocking meets this exclusion criteria (orders that are delayed or refused by the CLEC) and report the results, both with and without the exclusions. An unanticipated significant increase in traffic is indicated by a 20% increase for small trunk groups or 1800 CCS for large groups over the previous months traffic when the increase was not forecasted by the CLEC.

Monthly Average Blocking:

- The reporting cycle includes both business and non-business days in a calendar month.
- Monthly average blocking values are calculated for each trunk group for each of the 24 time consistent hours across a reporting cycle.

Aggregate Monthly Blocking:

- Used to compare aggregate blocking across trunk groups which terminate traffic at CLEC points of presence versus BellSouth switches.
- Aggregate monthly blocking data is calculated for each hour of the day across all trunk groups assigned to a category.

Trunk Categorization:

- This report displays, over a reporting cycle, aggregate, average blocking data for each hour of a day. Therefore, for each reporting cycle, 24 blocking data points are generated for two aggregate groups of selected trunk groups. These groups are CLEC affecting and BellSouth affecting trunk groups. In order to assign trunk groups to each aggregate group, all trunk groups are first assigned to a category. A trunk group's end points and the type of traffic that is transmitted on it define a category. Selected categories of trunk groups are assigned to the aggregate groups so that trunk reports can be generated. The categories to which trunk groups have been assigned for this report are as follows.

CLEC Affecting Categories:

	Point A	**Point B**
Category 1:	BellSouth End Office	BellSouth Access Tandem
Category 3:	BellSouth End Office	CLEC Switch
Category 4:	BellSouth Local Tandem	CLEC Switch
Category 5:	BellSouth Access Tandem	CLEC Switch
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

BellSouth Affecting Categories:

	Point A	**Point B**
Category 1:	BellSouth End Office	BellSouth Access Tandem
Category 9:	BellSouth End Office	BellSouth End Office
Category 10:	BellSouth End Office	BellSouth Local Tandem
Category 16:	BellSouth Tandem	BellSouth Tandem

Calculation

Monthly Average Blocking:

- For each hour of the day, each day's raw data are summed across all valid measurements days in a report cycle for blocked and attempted calls.
- The sum of the blocked calls is divided by the total number of calls attempted in a reporting period.

Aggregate Monthly Blocking:

- For each hour of the day, the monthly sums of the blocked and attempted calls from each trunk group are separately aggregated over all trunk groups within each assigned category.
- The total blocked calls is divided by the total call attempts within a group to calculate an aggregate monthly blocking for each assigned group.

- The result is an aggregate monthly average blocking value for each of the 24 hours by group.
- The difference between the CLEC and BellSouth affecting trunk groups are also calculated for each hour.

Report Structure

- CLEC Specific
  State
- With and Without Exclusion for Orders Delayed or Refused by CLEC

Data Retained

Relating to CLEC Experience

- Report Month
- Total Trunk Groups
- Number of Trunk Groups by CLEC
- Hourly Blocking Per Trunk Group
- Hourly Usage Per Trunk Group
- Hourly Call Attempts Per Trunk Group

Relating to BellSouth Performance

- Report Month
- Total Trunk Groups
- Aggregate Hourly Blocking Per Trunk Group
- Hourly Usage Per Trunk Group
- Hourly Call Attempts Per Trunk Group

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• CLEC Trunk Group	Any 2 consecutive hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• CLEC Trunk Group	Any 2 consecutive hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BellSouth
• BellSouth Trunk Group	

B-5: Usage Data Delivery Timeliness

Definition

This measurement provides a percentage of recorded usage data (usage recorded by BellSouth and usage recorded by other companies and sent to BellSouth for billing) that is delivered to the appropriate CLEC within six (6) calendar days from the receipt of the initial recording. A parity measure is also provided showing timeliness of BellSouth messages processed and transmitted via CMDS. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.

Exclusions

None

Uncompleted call data

Non-completed calls.

Business Rules

The purpose of this measurement is to demonstrate the level of timeliness for processing and transmission of usage data delivered to the appropriate CLEC. The usage data will be mechanically transmitted or mailed to the CLEC data processing center once daily. The Timeliness interval of usage recorded by other companies is measured from the date BellSouth receives the records to the date BellSouth distributes to the CLEC. Method of delivery is at the option of the CLEC.

The usage data to be covered by this metric not only involves CLEC customer usage, but also the following ADUF (access daily usage file) for EMI transmissions, or 11-01-xx) record types needed to bill third parties.

- The 11 designates Carrier Access Usage
- The 01 designates Originating and Terminating
- The last two digits specifically identify the traffic type:
  - 01 – Message Telephone Service (this is typically orig and term LD traffic)
  - 02 – Outwats
  - 05 – Originating 800
  - 16 – Information Service Provider (e.g. 976)
  - 20 – FGD Terminating Access
  - 25 – 800 data base service
  - 26 – Originating 500 access
  - 31 – local telephone service (this is terminating recio comp records)
  - 32 – DA

Calculation

Usage Data Delivery Timeliness Current month = (a b) X 100

- a = Total number of usage records sent within six (6) calendar days from initial recording/receipt
- b = Total number of usage records sent

Report Structure

- CLEC Aggregate
- CLEC Specific
- Region

Data Retained

Relating to CLEC Experience

- Report Month
- Record Type
  BellSouth Recorded
  Non-BellSouth Recorded

Relating to BellSouth Performance

- None

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	>= 95% Delivered within 6 Calendar Days

SEEM Measure

SEEM	Tier I	Tier II
No	.....	.....

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

B-6: Mean Time to Deliver Usage

Definition

This measurement provides the average time it takes to deliver Usage Records to a CLEC. A parity measure is also provided showing timeliness of BellSouth messages processed and transmitted via CMDS. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.

Exclusions

None

Non-completed calls.

Business Rules

The purpose of this measure is to calculate the average number of days it takes BellSouth to deliver usage data to the appropriate CLEC. The calculation reflects the differences between the date the data is transmitted or mailed to the CLEC and the date the data is generated by Customer divided by the total record volume delivery.

Each delivery record is calculated as the time, in days, between when the customer generates the call and when BellSouth delivers the usage data to the CLEC. Each delivery record is categorized by the resulting number of days.

An estimated interval is calculated for each category by taking the total number of usage data records delivered for that period and multiplying it by the total number of days in that period. The mean (average) time to deliver the usage data is calculated by summing all estimated intervals and dividing by the total number of records delivered.

Note: Any usage record falling in the 30+ day interval will be added using an average figure of 31.5 days.

Usage data is mechanically transmitted or mailed to the CLEC data processing center once daily. Method of delivery is at the option of the CLEC.

The usage data to be covered by this metric not only involves CLEC customer usage, but also the following ADUF (access daily usage file) for EMI transmissions, or 11-01-xx) record types needed to bill third parties.

- The 11 designates Carrier Access Usage
- The 01 designates Originating and Terminating
- The last two digits specifically identify the traffic type:

01 – Message Telephone Service (this is typically orig and term LD traffic)
02 – Outwats
05 – Originating 800
16 – Information Service Provider (e.g. 976)
20 – FGD Terminating Access
25 – 800 data base service
26 – Originating 500 access
31 – local telephone service (this is terminating recio comp records)
32 – DA

Calculation

Delivery Interval Record = (a - b)

- a = Date BellSouth delivers the usage data
- b = Date usage data is generated by the customer

Estimated Interval = (c X d)

- c = Number of records delivered in each category
- d = Number of days to deliver for the category

Mean Time to Deliver Usage = (e / f)

- e = Sum of all estimated intervals
- f = Total number of records delivered

Report Structure

- CLEC Aggregate
- CLEC Specific
- Region

Data Retained

Relating to CLEC Experience

- Report Month
- Record Type
  BellSouth Recorded
  Non-BellSouth Recorded

Relating to BellSouth Performance

- None

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	<= 6 Days

SEEM Measure

SEEM	Tier I	Tier II
No	.....	.....

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	Not Applicable

CM-11: Percent of Change Requests Implemented within ~~60~~ the Specified Interval ~~Weeks of Prioritization~~

Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

Exclusions

Change requests that are implemented later than ~~60 weeks~~ the specified interval with the consent of the CLECs
Change requests for which BellSouth has regulatory authority to exceed the interval

Business Rules

This metric is designed to measure BellSouth's monthly performance in implementing prioritized change requests. The clock starts when a change request has first been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will implement software related changes within 60 weeks and process related changes within 60 calendar days. ~~BellSouth will begin reporting this monthly measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.~~

Calculation

Percent of Type 5 CLEC initiated Change Requests implemented on time = (a / b) X 100

a = Total number of prioritized Type 5 Change Requests implemented each month that are less than or equal to 60 weeks of age from the date of their first prioritization plus all other prioritized change requests existing at the end of the month that are less than or equal to ~~60 weeks~~60weeks/days of age from prioritization.

b = All entries in "a" above plus all Type 5 Change Requests prioritized more than ~~60 weeks~~ 60 weeks/days before the end of the monthly reporting period.

Percent of Type 4 BellSouth initiated Change Requests implemented on time = (a / b) X 100

a = Total number of prioritized Type 4 Change Requests implemented each month that are less than or equal to 60 weeks/days of age from the date of the release prioritization list plus all other Type 4 prioritized change requests existing at the end of the month that are less than or equal to 60 weeks/days of age from prioritization.

b = All entries in "a" above plus all Type 4 Change Requests prioritized more than 60 weeks days before the end of the monthly reporting period.

Report Structure

BellSouth Aggregate
Type 4 requests implemented
Type 5 requests implemented
% implemented within 16, 32, 48, and 60 weeks

Data Retained

Region
Report Month
Total implemented by type
Total implemented within 60 weeks

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
- Region	95% within interval
- Type 4 requests implemented	95% within interval
- Type 5 requests implemented	95% within interval

SEEM Measure

SEEM	Tier I	Tier II	Tier III
Yes		X	

SEEM Disaggregation	SEEM Analog/Benchmark
- Region	95% within interval