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REPORTING

November 22, 2000

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 000121-TP

Dear Mrs. Bayo:

Enclosed are AT&T's Comments in response to the "Straw Proposal" issued by the staff of the Florida Public Service Commission in the above-reference docket.

Thank you for your assistance with this matter.

Sincerely,

Marsha Rule

MER:kfj  
Enclosures

APP	_____
CAF	_____
CMP	3 _____
COM	6 _____
CTR	_____
ECR	1 _____
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**AT&T's Comments on Staff's  
Straw Proposal for Performance Measurements Plan**

Introduction

AT&T hereby files its comments in response to the "Straw Proposal" issued by the Staff of the Florida Public Service Commission. These comments are meant to provide recommendations for key changes to the Staff proposal. AT&T plans to file testimony in this docket that will discuss the Staff proposal at greater length and in more detail. The section numbering below corresponds with the numbering in the Staff Proposal.

**1. Scope**

The Staff Recommendation states that the SQM measures, enforcement measures, and the benchmarks and analogs will be "re-addressed" at the conclusion of the OSS test to incorporate any changes or modifications recommended by KPMG after its adequacy review. The KPMG adequacy review is scheduled for completion after the hearing in this docket, and KPMG's conclusions will occur outside the record in this proceeding. In order to provide the Commission with the best possible record for its decision in this docket, AT&T recommends that the hearing be scheduled to allow the KPMG assessment to be entered into the record as evidence. Under the current schedule, it is possible for the KPMG assessment to supercede the evidence presented at the hearing, which AT&T believes would be inappropriate.

**2. Measurement Reporting**

2.1 The Staff's proposal calls for BellSouth to "report its performance to individual ALECs and to the Florida Public Service Commission in accordance with the list of SQM which are contained in Exhibit A<sup>1</sup>." AT&T requests that the Commission instead utilize the measures it included in its Exhibit A as a starting point for the measures to be

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considered for inclusion in the permanent SQM. Although AT&T understands that KPMG could potentially recommend additional measures at the conclusion of its adequacy review referred to in Section 1.2 of the Staff Proposal, the list of seventeen additional measures proposed by ALECs approximately one year ago could be insufficient to adequately augment the current SQM measures<sup>2</sup>. AT&T requests that all parties be permitted to propose additional SQMs. Additionally some examples of new measures that could be considered by the Commission are included in those proposed recently by the CLEC Coalition in the Georgia performance measures proceeding in docket 7892-U<sup>3</sup>. (See Attachment A).

2.3 BellSouth should be required to report separately on its performance for each reporting dimension as provided to: (1) its own retail customers, (2) any of its affiliates that provide local service, (3) competing carriers (ALECs) in the aggregate, and (4) the individual ALEC receiving the performance report. "Affiliate" includes any BellSouth affiliate that purchases local service for resale or purchases unbundled network elements and interconnection from BellSouth as well as affiliates which provide advanced services by BellSouth. Performance results for BellSouth and BellSouth affiliates should be provided to ALECs as proprietary information.

This Commission should require BellSouth to report the outcome of the statistical procedures applied for each sub-measure for which a parity determination will be made.

In addition, the benchmark results should be reported.

The Commission should require BellSouth to report performance measurement results on a summarized spreadsheet and include at a minimum those fields of information specified on the attached spreadsheet (see **Attachment B** for an illustrative example of this

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<sup>1</sup> AT&T will provide comments on the details of these measures in its direct testimony.

<sup>2</sup> Indeed, the Commission Staff appropriately recognized the dynamic nature of this issue in its proposal. (See Section 3 for Staff Recommendation of six month review cycles which will include the opportunity for additions to measures.)

<sup>3</sup> Some of the measures proposed in Georgia are already included for review by KPMG in the third party test.

formatting requirement). The results should be reported by BellSouth on a rolling 12-month basis on the summarized spreadsheet for all measures. For example, the January 2000 report would contain data for the 12 month period of February 1999 through January 2000. The February 2000 report would contain data for the twelve month period of March 1999 through February 2000, and so on.

2.5 In order to ensure that BellSouth complies with the deadline for posting monthly reports and data on its web-site, it is recommended that that BellSouth incur a \$5000.00 penalty payable to the State General Revenue Fund for every day past the due date for late delivery of the reports and data. BellSouth's liability should be determined based on the latest report delivered to any ALEC.

2.6 It is recommended that BellSouth incur a \$1,000.00 penalty for every day past the due date for incomplete performance data and reports.

#### **4. Enforcement Mechanisms**

4.1 AT&T recommends the AT&T Performance Incentive Plan, Version 2.0<sup>4</sup> as an enforcement mechanism used to verify and maintain parity performance between BellSouth and an individual ALEC's operations as well as to maintain access to Operational Support System functions.

#### **4.3 Definitions**

4.3.1. Any system of self-enforcing consequences should be based upon an underlying set of performance measurements that covers the full panoply of activities that ALECs must rely upon BellSouth to provide to deliver their own retail service offerings. The enforcement mechanism measurements proposed were selected from an already inadequate set of measures within BellSouth's SQM. The subset of measurements

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<sup>4</sup> AT&T's Post-Workshop Comments, Florida Public Service Commission, CC Docket 000121-TP, filed 8/25/2000.

selected for inclusion in the remedy plan will not allow for sufficient monitoring of BellSouth's performance in critical, customer-impacting areas (e.g. hot cuts, change management, etc.). As an example, BellSouth can make software changes and provide the associated documentation to the ALEC in an inadequate timeframe without any consequences. Therefore, an ALEC has insufficient time and information to make necessary changes to eliminate customer ordering abnormalities. A comprehensive set of comparative measurements that monitor all areas of support (i.e., pre-ordering, ordering, provisioning, maintenance, operator services, directory assistance, collocation, trunking, change management and billing) should be in an enforcement plan. All measures ordered by the Commission for inclusion in the BellSouth SQM should also be specified as Enforcement Measures. In addition, measures specified in Attachment A that are absent from the BellSouth SQM should also be Enforcement Measures.

#### 4.3.2. % Flow-Through

AT&T recommends that flow-through for all services be established at 95%. Given that BellSouth excludes ALEC errors, and any orders that it has designed not to flow-through, this is a reasonable target. AT&T also requests that the Commission require BellSouth to improve its process to provide for non-discriminatory flow-through of ALEC service orders. KPMG's analysis of retail flow-through should be incorporated into any final recommendation.

#### FOC and Rejection Timeliness

AT&T recommends that the thresholds for the benchmarks for these measures be changed to 95%. AT&T is unaware of any other RBOC being allowed to establish benchmarks for its measures below 90%.

AT&T recommends the following analogs/benchmarks for the other enforcement measures recommended by the Staff, but for which no benchmarks were provided:

#### Loop Make-Up Timeliness

Mechanized

95% within 1 minute

Non-Mechanized	95% within 3 business days
Coordinated Customer Conversions Interval 100% within 15 minutes	95% in less than <5 minutes,
Coordinated Customer Conversions Hot Cut Timeliness (Start is frame due time/end time is call to ALEC/ 1-10 lines 1 one hour window)	95% on time
LNP Missed Appointments	Retail analog /Retail POTS
LNP Disconnect Timeliness	95% within 15 minutes

4.3.3 BellSouth's explanation<sup>5</sup> of the services represented in the Retail Residence, Retail Business and Retail Design designation highlight the fact that the proposed retail analogs are not appropriate retail analogs for UNE Loops, UNE xDSL or even UNE Loop & Port Combos given the vast set of services that constitute Retail Residence, Retail Business and Retail Design. In fact, the different methods used to provision this diverse set of services supports the appropriateness for product specific retail analogs. As an example, for provisioning and maintenance measurement result comparisons of product specific retail analogs, UNE 2 wire analog loop would be compared to Retail POTS or UNE 4 Wire DS1 would be compared to Retail DS1.

AT&T recommends that the Staff also revise its retail analogs to disaggregate and compare dispatched orders for both ALEC and BellSouth retail services and non-dispatched orders for both ALEC and BellSouth retail services. Dispatch and non-dispatched orders are not like processes and should not be combined and/or compared to each other. Further, BellSouth has confirmed that UNE cut-overs are non-dispatch orders.<sup>6</sup>

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<sup>5</sup> Georgia Public Service Commission, Re: Performance Measurement For Telecommunications Interconnection Unbundling and Resale; BellSouth Telecommunications, Inc. Docket 7892-U, August 21, 2000(See Attachment )

<sup>6</sup> From the 10/25/00 Florida Third Party Test meeting notes recorded and distributed by KPMG.

It is requested that the Staff revise its level of disaggregation so that like products and services can be compared. For example, UNE design services and retail design services are currently comprised of very different products and product mixes, as BellSouth's own performance reporting illustrates. For example, BellSouth's September regional performance for Order Completion Interval for UNE Design-dispatch was 14.54 days and for retail design-dispatch was 26.30 days. This level of disparity exists month after month. Clearly these are not analogous services. AT&T recommends that the Commission adopt the disaggregation and retail analogs outlined in Attachment C.

BellSouth is required to provide ALECs non-discriminatory treatment. As such, they should receive treatment at least equal in quality to that provided by BellSouth to itself or to any subsidiary or affiliate. Therefore, BellSouth's performance to its affiliates should become the standard where BellSouth's performance for its affiliates is superior to its performance to its own retail customers.

4.3.5 Based on Exhibit C of the Staff proposal, comparisons within a cell may not be like-to-like. The disaggregation, namely wire center, time of month, dispatched, residential and new orders, specified in Exhibit C of Florida Public Service Commission PAP does not appear to have product disaggregation at the cell level. Excluding product level disaggregation at the cell level would nullify the validity of the comparison result. Sufficient disaggregation is absolutely essential for accurate comparison of results within a cell.

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**Q1 AT&T asked "The first question relates to the number of orders in the non-dispatch and dispatch categories. Previously BellSouth has stated that most of the UNE orders were dispatch. That is clearly not the case for this set of orders (308 dispatch-4154 non-dispatch). Will BellSouth please provide information describing the order activity involved for those orders in the non-dispatch category. (Your SQM indicates that you exclude record, test and disconnect orders)"- BellSouth responded "that orders in the non-dispatched category include cutover orders involving the central office only; orders involving central office work only where the customer changes from one BST to CLEC; CLEC to CLEC; CLEC to BST; any other central office or translation type order including UNE loops with NP (emphasis added)**

Performance determinations are not required to be made at the aggregated level.

Truncated z does provide a means for aggregating individual z scores resulting from the application of modified z. However, the performance determination can be made at the sub-measure level based solely on the individual z score resulting from modified z.

4.3.6 The Parity Gap calculation uses the output, namely test statistic, generated from truncated z methodology. The Parity Gap calculation is not included in the truncated Z methodology. Therefore, a more appropriate remedy calculation can be developed which could also take advantage of the truncated z methodology for aggregating multiple z scores, resulting from modified z, into one test statistic.

4.3.7 All transactions in violation are not included in the Affected Volume and therefore do not incur a remedy. This is troubling given that the proposed plan is transaction based. The appropriateness of determining the Volume Proportion at the aggregate level and the remedy amount (affected volume \* fee schedule) at the disaggregated level has not been justified. This calculation methodology, which is specified in BellSouth's VSEEM III, is biased toward the ILEC. This method gives the ILEC smaller payments than if the Volume Proportion, which is calculated from the state aggregate-z, is applied to the total ALEC count. This remedy calculation methodology improperly excludes cells with positive z scores from the calculation even though these cells have already contributed to the aggregate z (test statistic). In other words, the Affected Volume is derived from transactions in cells with negative z scores and excludes the transactions in violation that are in cells with positive z scores.

4.3.8 The value of delta is of crucial importance because this value directly controls the performance point at which penalties will start to be assessed. The parameter delta measures the size of the violation. The parameter delta value should be set at no more than 0.25. Otherwise, the number of ALEC customers that can get bad service is too large before a remedy is incurred. Ideally, the decision relating to the value of parameter delta should be based on business judgment, namely by consideration of how large a violation of parity must be before it is "important". The table specified below illustrates



what various values of delta mean, for measures such as Missed Appointment. For selected ILEC percentages, in the range of 1 to 20, the table shows ALEC percentages for delta of values 0.1, .25, .35, .50, and 1.00.

**Values Of p(ALEC) For Various Values Of p(BellSouth) and Delta**

delta	0.1	0.25	0.35	0.50	1.00
p(BST)					
1	2.2	5.0	7.4	11.8	31.9
2	3.6	7.0	9.7	14.6	35.8
3	4.9	8.7	11.7	16.9	39.0
5	7.4	11.8	15.2	21.0	44.0
10	13.2	18.7	22.7	29.3	53.6
15	18.7	24.9	29.4	36.4	61.1
20	24.1	30.8	35.5	42.8	67.4

The Florida Public Service Commission staff recommends a delta of .50 for aggregated ALEC calculations and a value of .35 for individual ALEC calculations. As the table illustrates, for a parameter value of .50 if BellSouth is missing 5% of its own customers' appointments, then the ALECs should not be allowed to claim anything less than 21% misses as a "material violation." This table also illustrates that if BellSouth provides a 1% miss-rate for their own customers, then Delta=.50 implies the ALECs should have no basis for complaint until their miss-rate reaches 11.8%.

#### **4.4 APPLICATION**

4.4.4 Root cause analysis is a useful procedure for building action plans for unacceptable performance and should be incorporated within a performance measurement system, but it cannot serve as a vehicle for delaying or otherwise avoiding payment of identified performance failures.

#### **4.5 METHODOLOGY**

##### **Tier 1 Methodology**

4.5.1 The method, specified in Exhibit D of Staff's proposal, of calculating Tier I remedies reduces the potential liability for non-compliant performance by an ILEC. This

is due to an inappropriate calculation methodology being used. The calculation methodology, which determines violations at the aggregate level and applies remedies at the disaggregated level, is biased toward the ILEC. The result is that BellSouth will make smaller payments than if the volume proportion, which is calculated from the state aggregate-z, is applied to the total ALEC count. Therefore, the ILEC can avoid paying remedies on all transactions that represent a violation. The calculation methodology improperly excludes from the calculation cells with positive z scores, even though these cells have already contributed to the aggregate z. The remedy calculation also uses a factor, which is a slope of  $\frac{1}{4}$  for even gross violations that result in BellSouth paying only a fraction of the maximum penalty amount. In other words, the volume of transactions to which remedies would be applied is reduced.

4.5.2 Remedies should accrue on a per sub-measure basis. Payments on a per occurrence basis will be too small to incent BellSouth to behave in a nondiscriminatory manner. As a result, nascent services or embryonic ALECs would be most negatively affected. Paying remedies on a per transaction basis facilitates gaming the system given the embryonic level of business conducted by many ALECs. Many ALECs are not able to achieve commercial level of business given the dismal support currently provided to the ALEC industry. Therefore, transaction volumes are insignificant and are unable to generate sufficient remedies to motivate compliant behavior.

As represented above, remedies should accrue on a per sub-measure basis. However, if the Commission wishes to use a per transaction method as opposed to a per sub-measure method, then any and all statistical tests are precluded because each failed transaction therefore requires a remedy. This remedy should accrue regardless of whether the

transaction comes from a submeasure that would have passed a statistical test or not.

What this means is that all transactions in violation should incur a remedy.

The basic tenet of the proposed remedy payment plan is that payments should depend on the number of affected cases. If this philosophy is accepted, AT&T suggests the following simplified version of VSEEM:

The basic principle is that for each measure, the payment should depend on the extent to which ALEC customers have been adversely affected, beyond what parity treatment would give. This can be determined directly from the data. For a counted variable, for example Missed Installation Appointments, one would count the number of ALEC cases that are in excess of what would be expected if the ALEC proportion was equal to the BellSouth proportion. Call this number the "Excess". For example, if in one cell BellSouth missed 8% of its own appointments, and 23 out of 100 ALEC appointments, the Excess would be  $23 - (8\% \text{ of } 100) = 15$ . This calculation is done separately for each cell. If in some cell the ALEC received better-than-parity service, the Excess would be negative, and would be ignored as usual so that masking is avoided. The total Excess for this measure is obtained by adding (over cells) the positive Excess values.

The same approach can be applied to benchmarked measures. For example, for the measure "Percent response received within X seconds", suppose the benchmark is 90%. That is, one would allow 10% of the cases to be failures. If the data shows that 3 out of 12 ALEC cases are failures, we count the excess number of missed cases as  $3 - (10\% \text{ of } 12) - 3 - 1.2 = 1.8$ . We do not round off to an integer value (except possibly at the end, after aggregating). Once the total "Excess" for a measure is determined, it is translated into a dollar figure, according to a table similar to that provided by staff, to get the payment amount. For counts and benchmarks, this approach conforms to the VSEEM idea that one should "count cases", but does it in a much more direct way. There is no need for any Z-scores, or modified or truncated Z's. There is no testing involved, so the

whole discussion regarding balancing critical values and the value of delta becomes irrelevant. Also, it avoids the necessity of dealing with aggregation once agreement has been reached concerning the lowest level of disaggregation for a cell. To aggregate one would simply add up the "Excesses".

In order to get a dollar figure from the total Excess number, one could have a simple linear rule, i.e., \$X per case. This is may not be satisfactory given that the payment should escalate faster than a linear function (larger violations are more serious. When violations become very numerous, the whole ALEC operation is in peril.) There is room for argument and negotiation as to just what function of the total Excess should be used. To start with, a quadratic function is suggested. Guidance as to what makes sense can be obtained by running some simulations, in which one would have various scenarios (patterns and degrees of violations) and see what the expected payment would be for each scenario. Since the rule is so simple, this should not be difficult. To get useful results, one would need to have good estimates as to what the ALEC sample sizes and BellSouth percentages might be, for each measure.

For a measured variable such as Order Completion Interval (OCI), there are two ways to proceed. First, one could transform the measure to a counted variable by recording only whether the OCI was greater or less than some threshold value. This approach should be rejected, because once an order has been delayed past the threshold, BellSouth would have no incentive to complete the order. BellSouth's lack of incentive results from the lack of any additional penalty for further delay. A better approach is for each ALEC case with a measurement that is above the BellSouth average, to determine the excess measurement, and to add the positive excesses over all ALEC cases. For OCI, this would give the total "Days Delayed". As before, this has to be translated into a dollar amount.

4.5.6. The remedy calculation methodology does not result in all violating transactions generating remedies. In essence, remedies may not apply to any transactions in a "negative" cell given that non-compliance is determined at the aggregated level as opposed to the cell level.

Remedies should accrue on a per submeasure basis. Payments under a per transaction basis will be too small to incent BellSouth to behave in a nondiscriminatory manner. If the Commission wishes to use a per transaction method as opposed to a per submeasure method, then the Commission should consider the alternative in 4.5.2.

### **Tier 3 Methodology**

4.5.8. The Tier III violation and penalty are too serious to be invoked automatically. The underlying reason for serious or repeated violations needs to be aired, and therefore the Commission should review performance periodically to decide on whether to apply the penalty.

Only the FCC has the authority to grant interLATA long distance authority to ILECs and the other Regional Bell Operating Companies. As a result, only the FCC may suspend or withdraw that authority.

The Florida Public Service Commission could accept a voluntary agreement from BellSouth to cease marketing interLATA long distance services in Florida if it exceeds a pre-determined level of performance failures. Alternatively, the Florida Public Service Commission could include in a Tier III category of its remedy plan that it will recommend to the FCC suspension or withdrawal of BellSouth's interLATA long distance authority if it exceeds a predetermined level of performance failure.

## **4.6 Payment of Tier 1 and Tier 2 Amounts**

4.6.1 BellSouth should remit a consequence payment by the 15<sup>th</sup> business day following the due date of the data and the reports upon which the consequences are based.

#### **4.7 Limitations of Liability**

4.7.1 BellSouth and the affected ALEC should jointly decide on what constitutes ALEC acts or omissions that nullify BellSouth's responsibility.

#### **4.8 Enforcement Mechanism Caps**

4.8.2 The Commission should decide whether and to what extent the amount in excess of the procedural cap should be paid out. BellSouth should pay out any amount in excess of the cap, including accrued interest, according to Commission order.

#### **5.0 Market Penetration Adjustment**

5.1 The market penetration adjustment, namely factor "n", should be based on the current level of local competition, as specified in FCC-reported data. In effect, "n" is a multiplier for the Tier II consequence amount that takes into account the extent of competitive penetration within the state.

<b>Lines provided to ALECs/Total ILEC and ALEC Lines</b>	<b>Value of "n"</b>
more than 50%	0
more than 40% to less than or equal 50%	1
more than 30% to less than or equal 40%	2
more than 20% to less than or equal 30%	4
more than 10% to less than or equal 20%	6
more than 5% to less than or equal 10%	8
0% to less than or equal 5%	10

Application of this market penetration methodology decreases the consequences for industry-level violations as the ALEC market penetration increases. Thus, as competition becomes established, the size of the applicable Tier II consequence is reduced to zero if BellSouth no longer provides a majority of the local lines to the ALECs in its serving area. Therefore, there is an incentive to open markets.

If the Staff retains their recommended methodology, the Commission should adopt the Louisiana Staff Initial Recommendation. The Louisiana Public Service Commission staff proposed a range of 5 to 100 observations as opposed to 10 to 100 as the criteria for applying the market penetration adjustment in its Staff Initial Recommendation.

5.2 A market penetration methodology should be applicable to all enforcement measures that serve to monitor all areas of support that should be in an effective enforcement plan.

5.4 Staff has recommended a market penetration methodology. However, this methodology may not generate remedies significant enough to address the Staff's intended purpose. The remedy calculation already minimizes the remedy amount. Therefore, trebling an already inadequate amount is not going to result in the motivation that is required to influence an ILEC to provide nondiscriminatory behavior. Given the inadequacies of the remedy calculation, it would seem inappropriate for the market penetration adjustment to be dependent on the Tier II calculation. If Staff is insistent on its recommendation, then the concerns relating to the remedy calculation should be addressed such that the remedies are meaningful. Additionally, Staff could establish a threshold amount such as \$25,000.00 to be the minimum market penetration adjustment amount for a given submeasure. Therefore, if trebling the Tier 2 amount is less than \$25,000.00, then the market penetration adjustment becomes \$25,000.00 for the submeasure determined to be out of compliance.

## **6. Auditing Measurement Data**

6.1 In addition to the annual audit, an audit should also be required when new measures are added. Further, audits of a few measures should be allowed when performance results indicate discrepancies between performance delivered to ALECs and BellSouth's performance for its retail operation. Finally, when an ALEC has reason to believe the data collected for a measure is flawed or the reporting criteria for the measure is not being adhered to, it should have the right to have a Mini-Audit performed on the specific measure and or submeasure upon written request, which should include the designation of an ALEC representative to engage in discussions with BellSouth about the requested Mini-Audit. If, within thirty days of the ALEC's written request, the ALEC believes that the issue has not been resolved to its satisfaction, the ALEC should be able to commence the Mini-Audit upon providing BellSouth with five business days advance written notice.

A Mini-Audit may encompass one entire measure or specific sub-measure. Mini-Audits should include all systems, processes and procedures associated with the production and reporting of performance measurement results for the audited measure. Mini-Audits should include two months of data. A third party auditor selected by mutual agreement of the audited and auditing parties should conduct Mini-Audits.

The results of each Mini-Audit should be submitted to the ALEC involved, and the Commission. Information in the Mini-Audit reports will be treated as trade secrets for the purposes of Florida law. BellSouth should be required to provide notification to all ALECs certificated to provide service and operational in BellSouth's service area of any Mini-Audit requested when the request for the audit is made.

The competitive market place must have the protection of independent auditing to ensure that BellSouth's reported measurement results are based upon properly designed data collection processes, results that are computed based on precisely defined and agreed upon methodologies, data that is retained according to specific guidelines, and data is



structured to allow an interested and authorized party to verify independently that an ALEC is receiving nondiscriminatory access and support from the ILEC.

6.2 The ILEC should be required to have an annual independent audit conducted of its performance measurement systems, paid for by the ILEC to ensure it is accurately reporting its performance to ALECs and to the Commission.

The ALEC should pay for the costs of the third party auditor conducting the Mini-Audit unless BellSouth is found to have materially misreported or misrepresented data or to have non-compliant procedures, in which case, BellSouth should pay for the costs of the third party auditor. Each party to the Mini-Audit should bear its own internal costs, regardless of which party ultimately bears the costs of the third party auditor. If, during a Mini-Audit, it is found that BellSouth has materially misreported or misrepresented data or has non-compliant procedures for more than 50% of the audited measures in a major service category, the entire service category should be re-audited at the expense of BellSouth. The major service categories for this purpose should be:

- Pre-Ordering
- Ordering
- Provisioning
- Maintenance and Repair
- Billing
- OS/DA
- E911
- Trunk Group Performance
- Collocation
- Change Management

The Commission should consider adopting an expedited process for use in connection with disputes between ALECs and BellSouth regarding performance tracking and reporting, as well as actual performance. An expedited process would provide a timely avenue of relief for ALECs in this critical area.

**Attachment A**  
**Additional Measures Proposed by CLECs**  
**Additional Pre-Order Measure (1)**

<b>Report/Measurement:</b>
Average Response Time for Loop Make-Up Information – Manual Access
<b>Definition:</b>
The average time required to provide any of the following loop makeup information:
<ol style="list-style-type: none"> <li>1. Loop Length</li> <li>2. Loop Length by Segment</li> <li>3. Length by Gauge</li> <li>4. 26 gauge equivalent loop length</li> <li>5. Quantity of load coils</li> <li>6. Location of load coils</li> <li>7. Quantity of bridge taps</li> <li>8. Location of bridged tap by occurrence</li> <li>9. Length of bridge taps by occurrence</li> <li>10. Quantity of pair gain/DLCs</li> <li>11. Location of pair gain/DLC</li> <li>12. Type of DLC</li> <li>13. Qualification status of loop based on specific PSD</li> <li>14. Source of data - actual or designed</li> <li>15. Presence of DAML</li> <li>16. Presence of disturbers in the same or adjacent binder groups</li> <li>17. Loop medium (copper or fiber)</li> <li>18. Length that is copper or fiber</li> <li>19. Whether a loop originates at a remote switching unit (RSU)</li> <li>20. Location of RSU (Remote Switching Unit)</li> <li>21. Type of RSU (Remote Switching Unit)</li> <li>22. Type of Plant (aerial or buried)</li> <li>23. Location of repeaters (designate mid-span)</li> <li>24. Type of repeaters</li> <li>25. Quantity of repeaters</li> <li>26. Availability of spare facilities</li> <li>27. Quantity of Low pass filters</li> <li>28. Location of Low pass filters</li> <li>29. Quantity of Range extenders</li> <li>30. Location of Range extenders</li> <li>31. Number of gauge changes</li> <li>32. Resistance Zone</li> </ol>
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>• The time starts when a request is received by the ILEC and ends when the information on the loop make-up has been made available to the CLEC.</li> </ul>
<b>Calculation:</b>
$\frac{\sum(\text{Date and Time the Loop make-up is made available to CLEC} - \text{Date and Time the CLEC request is received})}{\text{Total number of loop makeup queries}}$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC specific</li> <li>• CLEC aggregate</li> <li>• BST affiliate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• ADSL</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

- |   |
|---|
| <ul style="list-style-type: none"><li>• HDSL</li><li>• Other DSL</li><li>• Line Sharing / High Frequency Spectrum Network Element</li></ul> |
|---|

<b>Retail Analog/Benchmark:</b>
---------------------------------

- |   |
|---|
| <ul style="list-style-type: none"><li>• 95% within 72 hours</li></ul> |
|---|

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Average Response Time for Loop Make-Up Information – Mechanized (measured individually for each interface – EDI, RoboTag, Tag, and LENS)
<b>Definition:</b>
The average time required to provide any of the following loop makeup information:
<ol style="list-style-type: none"> <li>1. Loop Length</li> <li>2. Loop Length by Segment</li> <li>3. Length by Gauge</li> <li>4. 26 gauge equivalent loop length</li> <li>5. Quantity of load coils</li> <li>6. Location of load coils</li> <li>7. Quantity of bridge taps</li> <li>8. Location of bridged tap by occurrence</li> <li>9. Length of bridge taps by occurrence</li> <li>10. Quantity of pair gain/DLCs</li> <li>11. Location of pair gain/DLC</li> <li>12. Type of DLC</li> <li>13. Qualification status of loop based on specific PSD</li> <li>14. Source of data - actual or designed</li> <li>15. Presence of DAML</li> <li>16. Presence of disturbers in the same or adjacent binder groups</li> <li>17. Loop medium (copper or fiber)</li> <li>18. Length that is copper or fiber</li> <li>19. Whether a loop originates at a remote switching unit (RSU)</li> <li>20. Location of RSU (Remote Switching Unit)</li> <li>21. Type of RSU (Remote Switching Unit)</li> <li>22. Type of Plant (aerial or buried)</li> <li>23. Location of repeaters (designate mid-span)</li> <li>24. Type of repeaters</li> <li>25. Quantity of repeaters</li> <li>26. Availability of spare facilities</li> <li>27. Quantity of Low pass filters</li> <li>28. Location of Low pass filters</li> <li>29. Quantity of Range extenders</li> <li>30. Location of Range extenders</li> <li>31. Number of gauge changes</li> <li>32. Resistance Zone</li> </ol>
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>• The time starts when a request is received by the ILEC and ends when the information on the loop makeup has been made available to the CLEC.</li> </ul>
<b>Calculation:</b>
$\frac{\sum(\text{Date and Time the Loop Makeup is made available to CLEC} - \text{Date and Time the CLEC request is received})}{\text{Total number of loop makeup queries}}$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC specific</li> <li>• CLEC aggregate</li> <li>• BST affiliate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• ADSL</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

- |   |
|---|
| <ul style="list-style-type: none"><li>• HDSL</li><li>• Other DSL</li><li>• Line Sharing / High Frequency Spectrum Network Element</li></ul> |
|---|

<b>Retail Analog/Benchmark:</b>
---------------------------------

- |   |
|---|
| <ul style="list-style-type: none"><li>• 98% within __ seconds</li></ul> |
|---|

**Attachment A**  
**Additional Measures Proposed by CLECs**

**Additional Ordering Measures (4)**

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Acknowledgement Timeliness
<b>Definition:</b>
This measure is designed to monitor the rate at which the CLECs receive a timely acknowledgement from the ILEC after the submission of a Local Service Request.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  An acknowledgement is the first indicator that the Local Service Request has been received by the ILEC and is under analysis. Acknowledgement Timeliness is determined by computing the elapsed time (in minutes and seconds) from the ILEC receipt of a Local Service Request from the CLEC, to the time the ILEC returns the acknowledgement that a syntactically correct order has been received. Elapsed time is calculated for each acknowledgement. The acknowledgments that are returned within 15 Minutes are categorized in a manner consistent with the specified level of disaggregation, then divided by the associated total number of acknowledgements transmitted by the ILEC during the reporting period.</p> <p><b>Other Clarifications and Qualification:</b></p> <ul style="list-style-type: none"> <li>• When the ILEC processes orders for a CLEC via different interfaces (e.g., LENS, EDI or TAG) then the preceding measurement must be computed for each interface arrangement.</li> <li>• All intervals are measured in minutes and seconds rounded to the nearest second.</li> <li>• Because this should be a highly automated process, the accumulation of elapsed time continues through off-schedule, weekends and holidays.</li> <li>• "Syntactically correct" means all fields required to process an order are populated and reflect the correct format as agreed and documented in the current interface specifications.</li> </ul>
<b>Calculation:</b>
$\text{Acknowledgement Timeliness} = \frac{[(\text{Date and Time Local Service Request is Received by the ILEC}) - (\text{Date and Time Acknowledgement of Syntactically Correct Local Service Request is Transmitted From the ILEC Gateway})]}{[(\text{Count of All Acknowledgements Transmitted Within 15 Minutes}) / (\text{Count of All Acknowledgements Transmitted in the Reporting Period})]} \times 100$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• Fully Mechanized, Partially Mechanized, Total Mechanized</li> <li>• State and Region</li> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> </ul>
<b>Level of Disaggregation (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Interface Type</li> <li>• Product Type</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• Mechanized And Partially Mechanized Acknowledgements Are Returned Within 15 Minutes Of Receiving Local Service Requests, 98.0 Percent Of The Time.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Acknowledgement Completeness
<b>Definition:</b>
This measure is designed to monitor the percent of acknowledgements received by the CLEC from the ILEC after the submission of a Local Service Request.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  An acknowledgement is the first indicator that the Local Service Request has been received by the ILEC and is under analysis. Acknowledgement Completeness is determined by computing the number of acknowledgements transmitted by the ILEC and divided by the number of Local Service Requests received by the ILEC during the reporting period.</p> <p><b>Other Clarifications and Qualification:</b></p> <ul style="list-style-type: none"> <li>• When the ILEC processes orders for a CLEC via different interfaces (e.g., LENS, EDI or TAG) then the preceding measurement must be computed for each interface arrangement.</li> <li>• All intervals are measured in minutes and seconds rounded to the nearest second.</li> <li>• Because this should be a highly automated process, the accumulation of elapsed time continues through off-schedule, weekends and holidays.</li> <li>• "Syntactically correct" means all fields required to process an order are populated and reflect the correct format as agreed and documented in the current interface specifications.</li> </ul>
<b>Calculation:</b>
Acknowledgements Completeness = [(Total Number of Acknowledgements)/(Total Number of Service Requests Received in the Reporting Period)] X 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• Fully Mechanized, Partially Mechanized, Total Mechanized</li> <li>• State and Region</li> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Interface Type</li> <li>• Product Type</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• Mechanized And Partially Mechanized Acknowledgements Are Returned On 100 Percent Of The Mechanized And Partially Mechanized Local Service Requests.</li> </ul>



**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Firm Order Confirmation and Reject Response Completeness
<b>Definition:</b>
A response is expected from the ILEC for every Local Service Request transaction (version). More than one response or differing responses per transaction is not expected. 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.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• Service Requests canceled by the CLEC prior to being confirmed or rejected.</li> </ul>
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>• <b>Mechanized</b> - The number of FOCs or Rejects sent to the CLEC from LENS, EDI, TAG in response to electronically submitted LSRs (date and time stamp in LENS, EDI, TAG).</li> <li>• <b>Partially Mechanized</b> – The number of FOCs or Rejects sent to the CLEC from LENS, EDI, TAG in response to electronically submitted LSRs (date and time stamp in LENS, EDI, TAG), which fall out for manual handling by the LCSC personnel.</li> <li>• <b>Total Mechanized</b> - The number of the combination of Fully Mechanized and Partially Mechanized LSRs</li> <li>• <b>Non-Mechanized</b> - The number of FOCs or Rejects sent to the CLEC via FAX Server in response to manually submitted LSRs (date and time stamp in FAX Server).</li> </ul> <p><b>For CLEC Results:</b>  Firm Order Confirmation and Reject Response Completeness is determined in two dimensions:</p> <ul style="list-style-type: none"> <li>• Percent responses is determined by computing the number of Firm Order Confirmations and Rejects transmitted by the ILEC and dividing by the number of Local Service Requests (all versions) received in the reporting period.</li> <li>• Percent of multiple responses is determined by computing the number of Local Service Request unique versions receiving more than one Firm Order Confirmation, Reject or the combination of the two and dividing by the number of Local Service Requests (all versions) received in the reporting period.</li> </ul> <p><b>For ILEC Results:</b>  Same computation as for the CLEC.</p> <p><b>Other Clarifications and Qualification:</b></p> <ul style="list-style-type: none"> <li>• When the ILEC processes orders for a CLEC via different interfaces (e.g., LENS, EDI or TAG) then the preceding measurement must be computed for each interface arrangement.</li> <li>• The ILEC service agent's attempt to submit an order for processing by the ILEC OSS is considered equivalent to the ILEC acknowledgment of the CLEC's order.</li> <li>• The ILEC OSS return of any indication to the service agent that an order cannot be processed as submitted is considered equivalent to the ILEC return of a rejection notice to the CLEC.</li> <li>• Return of any information (e.g., order recapitulation) to the ILEC customer service agent that indicates no errors are evident or that an order can be processed, is the equivalent of the ILEC return of a FOC to the CLEC.</li> </ul>
<b>Calculation – Single FOC/Reject Response Expected</b>
Firm Order confirmation / Reject Response Completeness = [(Total Number of Service Requests for Which a Firm Order Confirmation or Reject is Sent/Total Number of Service Requests Received in the Report Period)] X 100
<b>Calculation – Multiple or Differing FOC/Reject Responses Not Expected</b>
Firm Order Confirmation and Reject Response Completeness = [(Total Number of Firm Order Confirmations Per LSR Version)+(Total Number of Reject Responses Per LSR Version)+(Combination of Firm Order Confirmation and Reject Per LSR Version)/(Total Number of Service Requests (All Versions) Received in the Reporting Period) X 100]
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• Fully Mechanized, Partially Mechanized, Total Mechanized, Non-Mechanized</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<ul style="list-style-type: none"><li>• State and Region</li><li>• CLEC Specific</li><li>• CLEC Aggregate</li><li>• BellSouth Specific</li></ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"><li>• Interface Type</li><li>• Product Type</li><li>• Volume</li></ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete.</p> <ul style="list-style-type: none"><li>• Firm Order Confirmations Or Reject Responses Are Returned On 100 Percent Of The Local Service Requests.</li><li>• Multiple Or Differing Firm Order Confirmations Or Reject Responses Are Returned On Zero Percent Of The Local Service Requests.</li></ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Timeliness of Response to Requests for BellSouth-to-CLEC Trunks Mean Time to Provide Response % Within 7 Days % Negative Responses
<b>Definition:</b>
Measures the time it takes for BST to provide the CLEC with a firm due date for inbound trunks.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• CLEC cancelled orders</li> </ul>
<b>Business Rules:</b>
Time begins with date the CLEC sends a complete ASR or Trunk Group Sizing Request via email or fax. The interval ends with the date the ILEC sends a FOC in response to a complete ASR or sends an ASR in response to a TGSR. Any queries regarding CLEC transmission should occur within five days. A query or a negative response to request. Neither queries or negative responses should stop the clock for this metric if (1) the query is invalid and CLEC request included all clearly required information and (2) the existing inbound trunks are operating at least at a 50% utilization level. BST will count the percent of requests receiving negative responses by reason (lack of facilities, need questioned, etc.).
<b>Calculation:</b>
Mean: $(\text{Date FOC/ASR returned} - \text{Date ASR/TGSR}) / \text{Number of Requests in Reporting Period}$ % On Time: $(\text{Number of FOCs/ASRs sent in 7 or less business days} / \text{all requests for inbound trunks in reporting period}) \times 100$ . % Negative: $(\text{Number of requests denied} / \text{Total Requests Submitted in Reporting Period}) \times 100$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Affiliate(s)</li> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• Interface Type (fax, email, ASR)</li> <li>• Negative Response Reason Type</li> </ul>
<b>Retail Analog/Benchmark:</b>
If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete: <ul style="list-style-type: none"> <li>• 95% in 7 days</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**  
**Additional Provisioning Measures (10)**

<b>Report/Measurement:</b>
Percent Completions/Attempts without Notice or with Less Than 24 Hours Notice.
<b>Definition:</b>
CLECs need adequate notice of order completion activities. They can be made to look disorganized by ILECs providing service without such advance notice: Customers and CLECs may even be unable to schedule necessary vendors on the scene to complete the installation, resulting in ILEC technicians being turned away and customer frustration with the CLEC. An ILEC could cause a great deal of harm to the CLEC competitively, yet look like it is providing parity or above parity service by the results other provisioning measures. A measurement capturing any non-parity in the occurrence of surprise or short-notice service deliveries also is critical to affording CLECs a reasonable opportunity to compete.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• Completions or Attempts Without Notice or With less than 24-hours' notice delivery that the CLEC specifically requested.</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  Calculation would exclude any successful or unsuccessful service delivery that CLEC was informed of at least 24 hours in advance. ILEC may also exclude from calculation deliveries on less than 24 hours' notice that CLEC requested.</p> <p><b>For ILEC Results:</b>  The ILEC reports completions for which ILEC technicians delivered service to customers without giving sufficient advance notice to customers, sales or to internal account team to arrange for appropriate vendors to be on hand. Calculation of insufficient notice is similar to CLEC calculation (none or less than 24 hours). Similar surprise service deliveries are calculated for ILEC affiliate's account representatives.</p>
<b>Calculation:</b>
Percent Completions or Attempts without Notice or with Less Than 24 Hours Notice = $[(\text{Completion Dispatches (Successful and Unsuccessful) With No FOC or FOC Received Within 24 Hours of Due Date}) / (\text{All Completions})] \times 100$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Product Type</li> <li>• MSA</li> <li>• Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• 99.9 Percent Of Completion And Completion Attempts Should Receive More Than 24 Hours Notice.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent Service Loss from Early Cuts
<b>Definition:</b>
Customers must not be subjected to unscheduled service disruptions because of lengthy or uncoordinated cutovers of loops with interim or permanent number portability or the provision of any other UNEs that require disconnection and reconnection of a customer.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  For coordinated loop cuts, the same loop is moved from an existing port to what is effectively a different port (The CLEC collocation point). Translation disconnects also are reported if they occur too early in a conversion involving local number portability. For each conversion, the ILEC will track whether the cutover time (for facilities and translations) was earlier than the committed due date and time that appeared on the FOC. The total number of early cutovers will be divided by the total number of customer conversions that were completed during the reporting period. The resulting ratio will be expressed as a percentage.</p> <p><b>For ILEC Results:</b>  ILECs would use retail residential or business POTS outside move activity as an analog. An outside move occurs when a customer, with existing service, moves from one premises to another within the same central office area without disconnecting and reconnecting service. With inside moves the customer keeps their own phone number. Although an outside move involves disconnecting an existing loop from an operating port and reconnecting a different loop (within the same office) to that same port, the work involved is very similar (i.e. coordinated re-termination).</p>
<b>Calculation:</b>
Percent Service Loss from Early Cuts = [(Customer Conversion Where Cutover Time is Earlier Than Due Date and Time)/(All Customer Conversions Completed During Reporting Period)] x 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Type of Loop or UNE Combination Cutover and Type of NP involved (i.e. ILNP, PNP or ILNP-to-PNP conversion).</li> <li>• MSA</li> <li>• Volume Category Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• 100% of coordinated cutovers begin no earlier than 15 minutes prior to the committed due date and time on FOC.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent Service Loss from Late Cuts
<b>Definition:</b>
Customers must not be subjected to unscheduled service disruptions because of lengthy or uncoordinated cutovers of loops with interim or permanent number portability or the provision of any other UNEs that require disconnection and reconnection of a customer.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  For coordinated loop cuts, the same loop is moved from an existing port to what is effectively a different port (The CLEC collocation point). Translation disconnects also are reported if they occur too late in a conversion involving local number portability. For each conversion, the ILEC will track whether the cutover time (for facilities and translations) was later than the committed due date and time that appeared on the FOC. The total number of cutovers that were completed more than 1 hour past the committed due date and time for 1-10 lines and more than 2 hours for more than 10 lines will be divided by the total number of customer conversions that were completed during the reporting period. The resulting ratio will be expressed as a percentage.</p> <p><b>For ILEC Results:</b>  ILECs would use retail residential or business POTS outside move activity as an analog. An outside move occurs when a customer, with existing service, moves from one premises to another within the same central office area without disconnecting and reconnecting service. With inside moves the customer keeps their own phone number. Although an outside move involves disconnecting an existing loop from an operating port and reconnecting a different loop (within the same office) to that same port, the work involved is very similar (i.e. coordinated re-termination).</p>
<b>Calculation:</b>
Percent Service Loss from Late Cuts = $\frac{[(\text{Customer Conversions Where Cutover Time is More than 1 hour Minutes Past Due Date and Time}) / (\text{All Customer Conversions Completed During Reporting Period})] \times 100}{1}$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Type of Loop or UNE Combination Cutover and Type of NP involved (i.e. ILNP, PNP or ILNP-to-PNP conversion.)</li> <li>• MSA</li> <li>• Volume Category</li> <li>• Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• 100% of Coordinated Cutovers complete no later than 1 hour past the committed due date and time on FOC for 1-10 lines and no later than 2 hours for greater than 10 lines.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent of Orders Cancelled or Supplemented at the Request of the ILEC
<b>Definition:</b>
Prior to or during the cutover, the ILEC may encounter internal problems with its network which make it impossible to perform the cutover at the agreed upon time. This results in significant inconvenience to the customer. As a result, the percent of orders that are cancelled or supped by the CLEC at the request ILEC must be measured. This measurement must be expressed as a fraction to understand both the number and the percent of times that the order must be supped at the ILEC Request.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  The percent of orders that are supplemented or cancelled due to a jeopardy and network problems attributable to the ILEC. The ILEC will track the number of orders that they request to be supplemented or changed. The total number of supplements and cancels from the CLEC will also be tracked. The ratio will be calculated by dividing the number of orders supplemented or cancelled at the request of the ILEC divided by the total supplements or cancels by the CLEC. For this formula, the resulting ratio will be expressed as a percentage.</p> <p><b>For ILEC Results:</b>  ILECs would use retail residential or business POTS outside move activity as an analog. An outside move occurs when a customer, with existing service, moves from one premises to another within the same central office area without disconnecting and reconnecting service. With inside moves the customer keeps their own phone number. Although an outside move involves disconnecting an existing loop from an operating port and reconnecting a different loop (within the same office) to that same port, the work involved is very similar (i.e. coordinated re-termination).</p>
<b>Calculation:</b>
Percent of Orders Cancelled or Supplemented at the Request of the ILEC = [(Number of Orders Cancelled or Supplemented at the Request of the ILEC During Reporting Period)/(Number of Cancels and Supplements During the Reporting Period)] x 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Product Type</li> <li>• MSA</li> <li>• Volume Category</li> <li>• Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• &lt;1.0 Percent Of Orders Supped Or Cancelled At The Request Of The ILEC.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent of Coordinated Cuts Not Working as Initially Provisioned
<b>Definition:</b>
Customers may experience either a full or partial loss of service due to defective ILEC facilities where the CLEC is reusing the customer's existing loop, or due to the switching platform not being properly set up with the 10 Digit / 6 Digit trigger being applied. To ensure that the CLEC's customers are not disproportionately losing dial tone, the percent of ILEC caused service interruptions outside of the initial customer cutover must be measured.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  The ILEC will track the number of Coordinated Cuts that are not working as initially provisioned by the number of provisioning troubles by the CLEC during the cutover process that are ultimately attributable to the ILEC. The measurement will be calculated by dividing the number of troubles by the total number of Coordinated Cuts provisioned for the CLEC during the reporting period.</p> <p><b>For ILEC Results:</b>  ILECs would use retail residential or business POTS outside move activity as an analog. An outside move occurs when a customer, with existing service, moves from one premises to another within the same central office area without disconnecting and reconnecting service. With inside moves the customer keeps their own phone number. Although an outside move involves disconnecting an existing loop from an operating port and reconnecting a different loop (within the same office) to that same port, the work involved is very similar (i.e. coordinated re-termination).</p>
<b>Calculation:</b>
Percent of Coordinated Cuts Not Working as Initially Provisioned = [(Number of Troubles Attributable to the ILEC on Initial Customer Cutover)/(Number of Coordinated Cuts Provisioned During The Reporting Period)] X 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Type of Loop or UNE Combination Cutover and Type of NP involved (i.e. ILNP, PNP or ILNP-to-PNP conversion).</li> <li>• MSA</li> <li>• Volume Category</li> <li>• Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• &lt;1 Percent Of All Coordinated Cuts Not Working As Initially Provisioned.</li> </ul>



**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Average Recovery Time
<b>Definition:</b>
Customers do not expect lengthy service outages due to problems experienced during the coordinated cut process. If problems do occur, the ILEC should work to minimize the customer outage. If a problem is found and can be isolated to the ILEC side of the network, the time between notification and resolution by the ILEC must be measured to ensure that CLEC customers do not experience unjustifiably lengthy service outages.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  When there is a problem during the porting process, the ILEC will track the average duration of each service outage or trouble. The duration time is defined as the time from the initial trouble notification until the trouble has been restored and an index number issued by the CLEC. For each trouble, the ILEC will track the duration of the trouble. The sum of all time associated with the troubles will be divided by the number of troubles. Average recovery time does not include time restoring a customer to the ILEC.</p> <p><b>For ILEC Results:</b>  ILECs would use retail residential or business POTS outside move activity as an analog. An outside move occurs when a customer, with existing service, moves from one premises to another within the same central office area without disconnecting and reconnecting service. With inside moves the customer keeps their own phone number. Although an outside move involves disconnecting an existing loop from an operating port and reconnecting a different loop (within the same office) to that same port, the work involved is very similar (i.e. coordinated re-termination).</p>
<b>Calculation:</b>
$\text{Average Recovery Time} = \frac{\sum \{[(\text{Date \& Time That Trouble is Closed By CLEC}) - (\text{Date \& Time Initial Trouble is Opened With ILEC})] / (\text{Number of Troubles Referred to the ILEC})\}}{}$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Type of Loop or UNE Combination Cutover and Type of NP involved (i.e. ILNP, PNP or ILNP-to-PNP conversion).</li> <li>• MSA</li> <li>• Volume Category</li> <li>• Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• 98.0 Percent Of Customer Recoveries (Troubles During The Porting Process) Resolved Within 1 Hour And 100 Percent Within 2 Hours.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Mean Time to Restore a Customer to the ILEC
<b>Definition:</b>
If there are extenuating circumstances during a port such that the customer is out of service for an extended amount of time, the CLEC may determine that the problem cannot be resolved quickly, and the service must be restored to the ILEC. The CLEC will communicate to the ILEC Coordinator that the customer needs to be restored to the ILEC until the situation can be resolved. To ensure that the customer is not out of service for an extended period of time during the restoration to the ILEC, the time it takes to re-establish the end user's service must be also be measured.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  If the customer has been out of service, and there are issues that cannot be fixed or resolved in an expeditious manner, the CLEC may request to reestablish the customer on the existing ILEC facilities. This will allow both the ILEC and the CLEC to resolve the issues and the port to proceed at a later date without further outage of the customer's service. For each customer restored to ILEC service, the ILEC will track the cumulative amount of time between the initial notification from the CLEC until the time when the end user or CLEC has confirmed that their service has been restored. The cumulative time will be divided by the number of customers restored to the ILEC during the reporting period.</p> <p><b>For ILEC Results:</b>  ILECs would use retail residential or business POTS outside move activity as an analog. An outside move occurs when a customer, with existing service, moves from one premises to another within the same central office area without disconnecting and reconnecting service. With inside moves the customer keeps their own phone number. Although an outside move involves disconnecting an existing loop from an operating port and reconnecting a different loop (within the same office) to that same port, the work involved is very similar (i.e. coordinated re-termination).</p>
<b>Calculation:</b>
Mean Time to Restore A Customer to the ILEC = $\frac{\sum\{[(Date \& Time Service is Restored to Customer) - (Date \& Time of Initial Notification to Restore)]\}}{(Number of Circuits Restored to ILEC)}$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Type of Loop or UNE Combination Cutover and Type of NP involved (i.e. ILNP, PNP or ILNP-to-PNP conversion).</li> <li>• MSA</li> <li>• Volume Category</li> <li>• Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• 98.0 Percent Of Customer Restorals To The ILEC Completed Within 1 Hour And 100 Percent Within 2 Hours.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent of Customers Restored to the ILEC
<b>Definition:</b>
In addition to monitoring the time it takes for the ILEC to re-establish the end-user's service, the frequency that a CLEC customer must be restored to the ILEC must be measured.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  The ILEC will track the number of circuits that need to be reestablished with the ILEC and divide them by the cumulative number of coordinated cuts during the established period. This measurement will be expressed as a percentage.</p> <p><b>For ILEC Results:</b>  ILECs would use retail residential or business POTS outside move activity as an analog. An outside move occurs when a customer, with existing service, moves from one premises to another within the same central office area without disconnecting and reconnecting service. With inside moves the customer keeps their own phone number. Although an outside move involves disconnecting an existing loop from an operating port and reconnecting a different loop (within the same office) to that same port, the work involved is very similar (i.e. coordinated re-termination).</p>
<b>Calculation:</b>
Percent Of Customers Restored to the ILEC = [(Number of Circuits Restored to ILEC/Number of Total Circuits Attempted to Port During Interval)] X 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation: (See Appendix A)</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Type of Loop or UNE Combination Cutover and Type of NP involved (i.e. ILNP, PNP or ILNP-to-PNP conversion).</li> <li>• Volume Category</li> <li>• MSA</li> <li>• Dispatch in/Dispatch out/Non-dispatch</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• &lt;0.1 Percent Of All Coordinated Cuts Restored To The ILEC.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Cooperative Acceptance Testing (What percentage of xDSL loops installed are tested)
<b>Definition:</b>
The loop would not be considered "tested" unless the BellSouth tech actually called the testing center, spoke with the CLEC representative, and jointly performed the tests
<b>Exclusions:</b>
None
<b>Business Rules:</b>
When a BellSouth technician finishes delivering an xDSL loop at the customer premise, he is to call a toll free number to the CLEC's testing center. The tech and the CLEC representative at the center then test the line. As an example of the type of testing performed, the testing center may ask the tech to put a short on the line, so that the center can run a test to see if it can identify the short.
<b>Calculations:</b>
$(\text{Total number of xDSL loops tested cooperatively by BellSouth}) / (\text{Total Number of xDSL loops installed in the reporting period.})$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• Specific as to the type of loop tested</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• MSA</li> <li>• Type of loop tested. (See Appendix A)</li> </ul>
<b>Retail Analog/Benchmark:</b>
BellSouth should test 100% of the lines.

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent Completion of Timely Loop Modification/De-Conditioning on xDSL loops:
<b>Definition:</b>
Some xDSL Loops Require Loop Modification/De-Conditioning to support xDSL services, including the removal of load coils, removal of excessive bridged tap, and removal of repeaters.
<b>Exclusions:</b>
None
<b>Business Rules:</b>
<b>Calculations:</b>
[(Number of xDSL Loops on Which Loop Modification/De-Conditioning was Completed within established interval)/(Number of xDSL Loops On Which Loop Modification/De-Conditioning Is Requested)]
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• Specific as to the type of loop tested</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• MSA</li> <li>• Type of loop (See Appendix A)</li> </ul>
<b>Retail Analog/Benchmark:</b>
95% within 5 business days

**Attachment A**  
**Additional Measures Proposed by CLECs**  
**Additional Billing Measures (5)**

<b>Report/Measurement:</b>
Percent Billing Errors Corrected in X Days
<b>Definition:</b>
Measures the timely correction of DUF errors and timely carrier bill adjustments.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>• This measurement applies to the daily usage feed and carrier wholesale bill adjustments.</li> <li>• Performance for the DUF measurement is measured at two levels: <ul style="list-style-type: none"> <li>▪ Severity 1 Bill Affecting where X = 24 hours with a maximum of 5 business days to correct error</li> <li>▪ Severity 2 Non-Bill Affecting where X = 3 business days with a maximum of 10 business days to correct error</li> </ul> </li> <li>• Elapsed time is measured in business days/hours. Clock starts when ILEC receives the CLEC's query or request for an adjustment (whether in electronic, written or voice form) and the clock stops when the CLEC receives the correct usage record from the ILEC.</li> <li>• The ILEC shall send correct usage record within X days/hours of receipt of a query.</li> <li>• The ILEC will adjust bill within X days (generally next CLEC bill unless adjustment request received after middle of the month)..</li> <li>• Only usage records fully corrected to the CLEC's specifications will be considered timely.</li> <li>• Excluded situations: <ul style="list-style-type: none"> <li>▪ CLEC may agree to exclude adjustments disputed by ILEC from metric. If ILEC does not wish to pursue mutual agreement on such exclusion, ILEC must report separately the number of queries in dispute at end of the month as separate sub-metric</li> </ul> </li> </ul>
<b>Calculation:</b>
Percent Billing Errors Corrected in X Days = $\Sigma$ [(Number of ILEC Responses in X Days/Hours) / (Total Number of Queries in Reporting Period)] x 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> <li>• BST Affiliates</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Bill Type (DUF, Carrier Wholesale Bill)</li> <li>• Severity Type</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <p>DUF:</p> <ul style="list-style-type: none"> <li>• Severity 1 = 90% corrected in 24 hours and 100% in 5 business days</li> <li>• Severity 2 = 90% corrected in 3 business days and 100% in 10 business days</li> </ul> <p>Carrier Wholesale Bill</p> <ul style="list-style-type: none"> <li>• 100% corrected within 45 Days.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Usage Timeliness
<b>Definition:</b>
This measure captures the elapsed time between the recording of usage data generated either by CLEC retail customers or access usage associated with CLEC customers and the time when the data set, in a compliant format, is successfully transmitted to the CLEC.
<b>Exclusions:</b>
None
<b>Business Rules:</b>
This measurement assumes a daily transmission of usage to the CLECs. If the CLECs do not request daily transmissions, the measurement still applies based upon transmission availability date, however, the actual timeliness of the usage received by the CLEC will vary depending upon their requirements for frequency of transmissions (e.g., weekly).
<b>Calculations:</b>
Sum ((Message Transmission Availability Date) - (Date of Message Recording)) / (Count of All Messages available for Transmission in Reporting Period)
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Product / Invoice Type <ul style="list-style-type: none"> <li>➢ Resale</li> <li>➢ UNE</li> <li>➢ Interconnection</li> </ul> </li> <li>• Geographic Scope <ul style="list-style-type: none"> <li>➢ Region</li> </ul> </li> <li>• Company</li> </ul>
<b>Retail Analog/Benchmark:</b>
Parity for Resale and UNE Benchmark for Jointly provided switched access Standard 95% within 5 days

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Recurring Charge Completeness
<b>Definition:</b>
This measure captures percentage of fractional recurring charges appearing on the correct bill.
<b>Exclusions:</b>
None
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>▪ The effective date of the recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.</li> </ul>
<b>Calculations:</b>
(Count of fractional recurring charges that are on the correct bill* / total count of fractional recurring charges that are on the bill) x 100
*Correct bill = next available bill
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Product / Invoice Type <ul style="list-style-type: none"> <li>➢ Resale</li> <li>➢ UNE</li> <li>➢ Interconnection</li> </ul> </li> <li>• Geographic Scope <ul style="list-style-type: none"> <li>➢ Region</li> </ul> </li> <li>• Company</li> </ul>
<b>Retail Analog/Benchmark:</b>
Parity for Resale Benchmark for Facilities/Interconnection and UNE Specials Standard – 90% Complete



**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Non-Recurring Charge Completeness
<b>Definition:</b>
This measure captures percentage of non-recurring charges appearing on the correct bill.
<b>Exclusions:</b>
None
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>▪ The effective date of the recurring charge must be within 30 days of the bill date for the charge to appear on the correct bill.</li> </ul>
<b>Calculations:</b>
(Count of non-recurring charges that are on the correct bill / total count of non-recurring charges that are on the bill) x 100
*Correct bill = next available bill
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Product / Invoice Type <ul style="list-style-type: none"> <li>➢ Resale</li> <li>➢ UNE</li> <li>➢ Interconnection</li> </ul> </li> <li>• Geographic Scope <ul style="list-style-type: none"> <li>➢ Region</li> </ul> </li> <li>• Company</li> </ul>
<b>Retail Analog/Benchmark:</b>
Parity for Resale Benchmark for Facilities/Interconnection and UNE Specials Standard – 90% Complete

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent On-Time Mechanized Local Service Invoice Delivery
<b>Definition:</b>
The purpose of this measurement is to monitor the percent of invoices successfully transmitted to the CLEC within 10 calendar days of the close of a bill cycle.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• Any invoices rejected due to formatting or content errors</li> </ul>
<b>Business Rules:</b>
This measure captures the elapsed number of days between the scheduled close of a Bill Cycle and the ILEC's successful transmission of the associated invoice to the CLEC. For each invoice, the calendar date of the scheduled close of Bill Cycle is compared to the calendar date that successful invoice transmission to the CLEC completes to determine the number transmitted within 10 calendar days. The number transmitted within 10 calendar days is divided by the number of complete invoices sent in the reporting period.
<b>Calculation:</b>
Percent On-Time Mechanized Local Services Invoice Delivery = $[(\text{Total Number of Mechanized Local Bills Received On Time}) / (\text{Total Number of Mechanized Local Bills Processed})] \times 100$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• Invoice (resale, UNE or interconnection services)</li> <li>• Region</li> </ul>
<b>Retail Analog/Benchmark:</b>
If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete: <ul style="list-style-type: none"> <li>• Mechanized Local Bills Received Within 10 Calendar Days, 98 Percent Of The Time.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

**Other Additional Measures (8)**

<b>Report/Measurement:</b>
Percent Response Commitments Met (On-Time)
<b>Definition:</b>
This measures whether the ILEC has kept commitment in contracts, business rules or provided on the initial phone for a substantive answer to a CLEC question or final resolution of the CLEC's problem. Different intervals may be appropriate based on the severity of the issue with problems stopping the CLECs ability to access pre-order and ordering systems or address a severe customer problem (i.e thousands of missing orders, confirmations or completions...
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p>ILEC must report on whether or not time committed to CLEC in contracts, separate agreements or at time of call are being kept by ILEC's support centers. For instance, if contract requires a response to a billing inquiry in 24 hours, then on-time responses would be those received within 24 hours after the CLEC places a query to the appropriate point of contact and compared to all the responses to billing queries due that reporting period. If an ILEC account representative promises a response in X amount of time, the metric would address whether that commitment was met compared with all the other committed answers due that month. The measurement would be equivalent to an Estimated Time to Repair or Repair Appointment Met metric applied to non-maintenance types of problems. Missed commitments are those days/hours between the time the response was due and the time the response was actually received. For ILEC retail measurement, time to respond to end user bill questions and other business office queries would be measured.</p> <ul style="list-style-type: none"> <li>• All queries answered while the CLEC or ILEC retail customer is on the phone will be considered on time for this metric.</li> <li>• Responses do not necessarily have to resolve issue but must provide additional information on the status of resolving the query. Any new response commitment provided during the partial response must be measured for on-time performance as well and will be counted as a new commitment.</li> <li>• If CLEC poses more than one question on same call, ILEC may provide different response commitments for each query and measure each query separately.</li> <li>• CLEC and ILEC may devise a priority rating system for measurement by which the CLEC will identify the type of query upon reaching a representative at the CLEC center and the type of response interval required for such a query. (i.e., questions regarding problems with an OSS gateway blocking order placement or pre-order queries may receive a higher priority than a question to explain a business rule that is not impeding order activity.)</li> <li>• If ILEC is uncertain about whether response qualified as meeting the commitment interval, ILEC may seek CLEC agreement that response commitment has been met. Responses that no action has been taken yet on a query do not count as timely.</li> </ul> <p>If a question is posed to the wrong center, the center receiving the query will direct the CLEC immediately to the appropriate center to respond to the question. Otherwise start time begins with initial call..</p>
<b>Calculation:</b>
Percent Response Commitments Met = $\Sigma$ [(Number of Response Commitments Met) / (Number of Responses Due in Reporting Period)] x 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<ul style="list-style-type: none"><li>• BST Affiliate</li></ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"><li>• Company (If dedicated representatives assigned to specific CLECs)</li><li>• Each CLEC Help Desk/Support Center (PreOrder, Ordering, Billing, etc.)</li><li>• Severity Type</li></ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"><li>• Billing = 100% in 24 hours of request for information</li><li>• Pre-Ordering/Ordering Help Desk = 98% within response commitment provided by ILEC</li><li>• Other = 95% within response commitment provided by ILEC</li><li>• 100% within 3 business days.</li></ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Mean time To Notify CLEC of Network Outages
<b>Definition:</b>
Both CLECs and ILECs must be made aware of major network events in order to notify customers and regulatory agencies (e.g. E-911 agencies, FAA, and other key customer accounts).  To that end, the ILECs must provide the CLECs with timely and detailed information (pertaining to a network incident) to afford CLECs the opportunity to make prudent business decisions regarding management of their own customer base and networks. For example, the ILEC would inform the CLEC that the network incident was caused by a cable cut at a specified location.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  The results will be based on the time it takes for the ILEC's Centralized Control Center to notify the CLEC and ILEC of a customer impacting network incident in equipment utilized by the CLEC. When the ILEC's Centralized Control Center becomes aware of the network incident, they must electronically notify both the ILEC and the CLEC.  The notification time for each outage will be measured in minutes and divided by the number of outages for the reporting period.</p> <p><b>For ILEC Results:</b>  Same computation as for the CLEC.</p>
<b>Calculation:</b>
$\text{Meantime To Notify CLEC} = \frac{\sum\{[(\text{Date and Time ILEC Notified CLEC}) - (\text{Date and Time ILEC detected network incident})]\}}{(\text{Count of Network Incidents})}$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Company</li> <li>• By Switch and Tandem</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"> <li>• Electronic Notification Procedures Are Required For Real-Time Network Incident Reporting From ILEC To CLEC.</li> <li>• Manual Reporting Processes May Be Required Until OSS Interfaces Become Operational.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Average Database Update Interval
<b>Definition:</b>
<p>CLECs must rely on ILEC databases in order to provide accurate E911/911 services, directory listings, directory assistance, and operator services. ILECs currently control the updating of many essential databases, such as the Line Information Database (LIDB); directory listings, E911 Automatic Location Identifier (ALI), Master Street Address Guide (MSAG) and selective routing databases.</p> <p>In addition, accurate and timely loading of NXXs before the LERG (Local Exchange Routing Guide) effectiveness date is vital to CLEC customer's receiving calls from ILEC customers, and it is essential to ensure that customers are charged correctly for local and toll calls. Routing of CLEC's NXXs at the tandem and central office to the proper Public Safety Answering Point (PSAP) for emergency calls also is critical to E911/911 service.</p> <p>Disparity in timely and accurate updates of the above databases can lead to annoying, costly and possibly "life and death" situations for CLEC customers.</p>
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• Updates Canceled by the CLEC</li> <li>• Initial update when supplemented by CLEC</li> <li>• ILEC updates associated with internal or administrative use of local services</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b></p> <p>The actual update interval is determined for each update processed during the reporting period. It is the elapsed time from the ILEC receipt of a syntactically correct transaction from the CLEC to the ILEC's accurate completion of updating all databases affected by the CLEC activity. Elapsed time for each update is accumulated for each affected database (e.g., E911/911, LIDB, Directory and Directory Listings). The time required to update each database is accumulated and then divided by the associated total number of updates completed within the reporting period.</p> <p><b>For ILEC Results:</b></p> <p>The ILEC computation is identical to that for the CLEC with the clarifications noted below.</p> <p><b>Other Clarifications and Qualification:</b></p> <ul style="list-style-type: none"> <li>• For LIDB, the elapsed time for an ILEC update is measured from the point in time when the ILEC's file maintenance process makes the LIDB update information available until the date and time reported by the ILEC that database updates are completed.</li> <li>• Results for the CLECs are captured and reported at the update level by Reporting Dimension (see below).</li> <li>• The Completion Date is the date upon which the ILEC issues the Update Completion Notice to the CLEC.</li> <li>• If the CLEC initiates a supplement to the originally submitted update and the supplement reflects changes in customer requirements (rather than responding to ILEC initiated changes), then the update submission date and time will be the date and time of ILEC receipt of a syntactically correct update supplement. Update activities responding to ILEC initiated changes will not result in changes to the update submission date and time used for the purposes of computing the update completion interval.</li> <li>• Elapsed time is measured in hours and hundredths of hours rounded to the nearest tenth of an hour.</li> <li>• Because this should be a highly automated process, the accumulation of elapsed time continues through off-schedule, weekends and holidays; however, scheduled maintenance windows are excluded.</li> </ul>
<b>Calculation:</b>
$\text{Average Update Interval} = \frac{\sum \{[(\text{Completion Date \& Time of Database Update}) - (\text{Submission Date and Time of Database Change})]\}}{(\text{Total Number of Updates Completed During Reporting Period})}$

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report Structure:</b>
<ul style="list-style-type: none"><li>• CLEC Specific</li><li>• CLEC Aggregate</li><li>• BST Aggregate</li></ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"><li>• Company</li><li>• Database Type</li></ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"><li>• 99.99 Percent Completed In 24 Hours Or 100 Percent Completed By LERG Effective Date.</li></ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent Database Update Accuracy
<b>Definition:</b>
<p>CLECs must rely on ILEC databases in order to provide accurate E911/911 services, directory listings, directory assistance, and operator services. ILECs currently control the updating of many essential databases, such as the Line Information Database (LIDB); directory listings, E911 Automatic Location Identifier (ALI), Master Street Address Guide (MSAG) and selective routing databases.</p> <p>In addition, accurate and timely loading of NXXs before the LERG (Local Exchange Routing Guide) effectiveness date is vital to CLEC customer's receiving calls from ILEC customers, and it is essential to ensure that customers are charged correctly for local and toll calls. Routing of CLEC's NXXs at the tandem and central office to the proper Public Safety Answering Point (PSAP) for emergency calls also is critical to E911/911 service.</p> <p>Disparity in timely and accurate updates of the above databases can lead to annoying, costly and possibly "life and death" situations for CLEC customers.</p>
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• Updates Canceled by the CLEC</li> <li>• Initial update when supplemented by CLEC</li> <li>• ILEC updates associated with internal or administrative use of local services</li> </ul>
<b>Business Rules:</b>
<p><b>For CLEC Results:</b>  For each update completed during the reporting period, the original update that the CLEC sent to the ILEC is compared to the Database following completion of the update by the ILEC. An update is "completed without error" if the database completely and accurately reflects the activity specified on the original and supplemental update (e.g., orders) submitted by the CLEC. Each Database (e.g., E911/911, LIDB, Directory and Directory Listings) should be separately tracked and reported.</p> <p><b>For ILEC Results:</b>  The ILEC computation is identical to that for the CLEC with the clarifications noted below.</p> <p><b>Other Clarifications and Qualification:</b></p> <ul style="list-style-type: none"> <li>• For LIDB, the elapsed time for an ILEC update is measured from the point in time when the ILEC's file maintenance process makes the LIDB update information available until the date and time reported by the ILEC that database updates are completed.</li> <li>• Results for the CLECs are captured and reported at the update level by Reporting Dimension (see below).</li> <li>• The Completion Date is the date upon which the ILEC issues the Update Completion Notice to the CLEC.</li> <li>• If the CLEC initiates a supplement to the originally submitted update and the supplement reflects changes in customer requirements (rather than responding to ILEC initiated changes), then the update submission date and time will be the date and time of ILEC receipt of a syntactically correct update supplement. Update activities responding to ILEC initiated changes will not result in changes to the update submission date and time used for the purposes of computing the update completion interval.</li> <li>• Elapsed time is measured in hours and hundredths of hours rounded to the nearest tenth of an hour.</li> <li>• Because this should be a highly automated process, the accumulation of elapsed time continues through off-schedule, weekends and holidays; however, scheduled maintenance windows are excluded.</li> </ul>
<b>Calculation:</b>
Percent Update Accuracy = [(Number of Updates Completed Without Error)/(Number Updates Completed)] X 100
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> </ul>



**Attachment A**  
**Additional Measures Proposed by CLECs**

<ul style="list-style-type: none"><li>• BST Aggregate</li></ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"><li>• Company</li><li>• Database Type</li></ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"><li>• 99.99 Percent Accurate</li></ul>

**Attachment A  
Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
NXX(s) & LRN(s) Loaded by LERG Effective Date
<b>Definition:</b>
Measures the number of NXXs & LRNs loaded and tested in end office and/or tandem switches by the LERG effective date.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>• This measurement applies to the daily usage feed and carrier wholesale bill adjustments.</li> <li>• Performance for the DUF measurement is measured at two levels: <ul style="list-style-type: none"> <li>▪ Severity 1 Bill Affecting where X = 24 hours with a maximum of 5 business days to correct error</li> <li>▪ Severity 2 Non-Bill Affecting where X = 3 business days with a maximum of 10 business days to correct error</li> </ul> </li> <li>• Elapsed time is measured in business days/hours. Clock starts when ILEC receives the CLEC's query or request for an adjustment (whether in electronic, written or voice form) and the clock stops when the CLEC receives the correct usage record from the ILEC.</li> <li>• The ILEC shall send correct usage record within X days/hours of receipt of a query.</li> <li>• The ILEC will adjust bill within X days (generally next CLEC bill unless adjustment request received after middle of the month )..</li> <li>• Only usage records fully corrected to the CLEC's specifications will be considered timely.</li> <li>• Excluded situations: <ul style="list-style-type: none"> <li>• CLEC may agree to exclude adjustments disputed by ILEC from metric. If ILEC does not wish to pursue mutual agreement on such exclusion, ILEC must report separately the number of queries in dispute at end of the month as separate sub-metric</li> </ul> </li> </ul>
<b>Calculation:</b>
$\left( \frac{\text{Number of NXXs or LRNs loaded and tested by LERG effective date}}{\text{Number of NXXs or LRNs scheduled to be loaded and tested by LERG effective date}} \right) \times 100$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> <li>• BST Affiliates</li> </ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"> <li>• Reported for all NXX or LRN codes scheduled to be loaded in reporting period.</li> <li>• NXX or LRN tables at end office</li> <li>• NXX or LRN tables at tandem</li> </ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <p>100% by LERG effective date.</p>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Notification of Interface Outages
<b>Definition:</b>
Measures the time it takes the ILEC to notify the CLEC of an outage of an interface.
<b>Exclusions:</b>
None
<b>Business Rules:</b>
<b>Calculations:</b>
$((\text{Number of Interface Outages where CLECs are notified within 15 minutes}) / (\text{Total Number of Interface Outages})) * 100$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>• CLEC Specific</li> <li>• CLEC Aggregate</li> <li>• BST Aggregate</li> </ul>
<b>Level of Disaggregation:</b>
By interface type for all interfaces accessed by CLECs
<b>Retail Analog/Benchmark:</b>
Benchmark
Standard – 97% in 15 minutes

**Attachment A**  
**Additional Measures Proposed by CLECs**

<p><b>Report/Measurement:</b></p> <p>Timeliness of Change Management Notices          Timeliness of Final Versions of Documents Associated w/ Change          Average Delay Days for Notices          Average Delay Days for Documentation          % ILEC v. CLEC Changes Made (May be Eliminated if Change Control Process Gives CLECs a Significant Role in prioritization)</p>
<p><b>Definition:</b></p> <p>Measures whether CLECs receive required notices and documentation on time to prepare for ILEC interface/ system changes so CLEC interfaces are not impaired by change. Last metric examines whether the ILEC is discriminating in ignoring CLEC requested changes to interfaces—i.e adding new queries and status notices, etc.</p>
<p><b>Exclusions:</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
<p><b>Business Rules:</b></p> <ul style="list-style-type: none"> <li>• These metrics are designed to measure the percent of change management notices and associated final documentation sent to the CLEC according to notification/documentation standards and timeframes prescribed by the Parties' Change Management Agreement.</li> <li>• Each type of change management notice is to be reported separately (see Appendix C).</li> <li>• Timely documentation is to be measured separately to the extent that times for providing documentation after each type of notice differ.</li> <li>• Documentation that is not accurate and complete to the extent that CLECs can implement change to their interfaces is not considered timely sent.</li> <li>• All intervals are measured in hours and hundredths of hours rounded to the nearest hundredth.</li> <li>• The accumulation of elapsed time is based on business days/hours.</li> <li>• Change notification must comply with agreed upon business rules for notification procedures and definition of type of change.</li> </ul> <p>Any changes made without notification will be considered "sent late".</p>
<p><b>Calculation:</b></p> <p>Percent of Change Management Notices Sent On Time = <math>\Sigma [(Change\ Management\ Notifications\ Sent\ Within\ Required\ Time\ Frames) / (Total\ Number\ of\ Change\ Management\ Notices\ Sent)] \times 100</math></p> <p>Percent of Change Management Final Documentation Sent On Time = <math>\Sigma [(Change\ Management\ Documentation\ Sent\ Within\ Required\ Time\ Frames\ After\ Notices) / (Total\ Number\ of\ Change\ Management\ Documentation\ Sent)] \times 100</math></p> <p>Average Delay Dates for Change Notices = <math>\Sigma [(Date\ Notice\ Sent - Date\ Notice\ Due) / (Total\ Number\ of\ Notices\ Sent)]</math></p> <p>Average Delay Dates for Final Documentation = <math>\Sigma [(Date\ Final\ Documentation\ Provided - Final\ Documentation\ Due) / (Total\ Final\ Change\ Management\ Documents\ Sent)]</math></p> <p>Percent ILEC Changes vs. CLEC Changes Made = <math>\Sigma [(Number\ of\ Type\ 5\ CLEC-Initiated\ Changes\ Implemented\ in\ Period) / (Total\ Number\ of\ CLEC\ Changes\ Requested)] \times 100</math>; and <math>\Sigma [(Number\ of\ Type\ 4\ ILEC-Initiated\ Changes\ Implemented\ in\ Period) / (Total\ Number\ of\ ILEC\ Changes\ Requested)] \times 100</math></p> <ul style="list-style-type: none"> <li>• Ratios will be expressed in terms of percentage and compared.              Counts of rejected and pending requests also will be reported monthly for both Type 4 (ILEC initiated) and Type 5 (CLEC initiated) categories.</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report Structure:</b>
<ul style="list-style-type: none"><li>• CLEC Specific</li><li>• CLEC Aggregate</li><li>• BST Aggregate</li><li>• BST Affiliates</li></ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"><li>• Company</li><li>• Type of Change Notice (Needs to Be Modified for BST Change Control Designations)<ul style="list-style-type: none"><li>Emergency</li><li>Regulatory Requirement</li><li>Industry Standards</li><li>BST initiated</li><li>CLEC initiated</li></ul></li></ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <p>98% on-time notification 98% on-time final documentation Average Delay Days: No more than 5. CLEC v. ILEC changes made: parity:</p> <ul style="list-style-type: none"><li>•</li></ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

**Attachment A**  
**Additional Measures Proposed by CLECs**

<b>Report/Measurement:</b>
Percent Software Certification Failures Software Problem Resolution Timeliness and Average Delay Days.
<b>Definition:</b>
The first metric measures whether ILEC goes into production with software change that still leads to ILEC-software causing failures to CLEC test deck. The second measures the time it takes the ILEC to fix software problems its changes have caused. Third metric captures how long it takes to repair problems once the resolution standard is passed.
<b>Exclusions:</b>
<ul style="list-style-type: none"> <li>CLEC caused software failures (with notification and agreement from CLEC.)</li> </ul>
<b>Business Rules:</b>
<ul style="list-style-type: none"> <li>ILEC test deck may either represent regression testing of a new software release or progression testing of software being released for the first time. A regression test deck is a collection of test scenarios designed to verify that functionality in a software release that was available in a previous release continues to work as prescribed. A progression test deck is a collection of test scenarios designed to verify that functionality in a software release that is being introduced for the first time (or is being removed) works as prescribed.</li> <li>Test scenario is a description of a business event and the systems transactions performed to accomplish the business event. Test scenarios also include pre-conditions, input data and expected results.</li> <li>During a 30 day period following release to production, ILEC will track the number of changes required as a result of CLEC experiencing malfunctions during the execution of transactions directly related to the pre-defined conditions in the test desk.</li> <li>A transaction is defined as failed if the request cannot be submitted or processed or results in incorrect or improperly formatted data.</li> <li>Software validation procedures, test deck scenarios and error correction standards are to be agreed to by CLEC and the ILEC, with this metric monitoring adherence to that agreement.</li> <li>ILEC may exclude any CLEC malfunctions if both parties agree that malfunctions were CLEC's fault. If parties cannot agree on fault, then ILEC must report the number of malfunction incidents in dispute.</li> <li>Problem resolution timeliness will reflect the percentage of preorder and order transaction rejections resolved within the timeframe agreed to by CLEC and the ILEC for both errors with and without work-around.</li> <li>Problem resolution time will start being measured from time problem reported to help desk to time CLEC concurs that problem no longer exists as confirmed on resolution notice call from the ILEC's help desk.</li> </ul>
<b>Calculation:</b>
$\text{Software Certification Failures} = \Sigma [(\text{Number of Test Transactions in Test Deck} - \text{Count of Changes Required Due to CLECs Experiencing Malfunctions}) / (\text{Number of Test Transactions in Test Deck})] \times 100$
$\text{Software Problems Resolved On-Time} = \Sigma [\text{Number of Times Problem Resolved on Time} / \text{Number of Problems Resolved}] \times 100$
$\text{Average Delay Hours/Days for Software Problem} = \Sigma [(\text{Date and Time Problem Resolution Confirmed by CLEC} - \text{Date and Time Problem Resolution Due}) / (\text{Total Number of Problems Resolved})]$
<b>Report Structure:</b>
<ul style="list-style-type: none"> <li>CLEC Specific</li> <li>CLEC Aggregate</li> <li>BST Aggregate</li> </ul>

**Attachment A**  
**Additional Measures Proposed by CLECs**

<ul style="list-style-type: none"><li>• BST Affiliates</li></ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"><li>• Company</li><li>• Interface Type</li><li>• Severity Type (Work Around, No-Workaround)</li></ul>
<b>Retail Analog/Benchmark:</b>
<p>If the ILEC does not deliver direct comparative results or the ILEC has not produced benchmark levels based upon a verifiable study of its own operation as agreed to with the CLEC, then result(s) related to the CLEC operation should be provided according to the following levels of performance in order to provide the CLEC with a meaningful opportunity to compete:</p> <ul style="list-style-type: none"><li>• No more than 0.1% of test deck transactions should result in CLEC problems</li><li>• Software errors with no work-around should be corrected in 24 hours.</li><li>• Software errors with work-arounds should be corrected in 72 hours</li><li>• Parity with ILEC affiliate on Delay Days or Standard of 100% in 48 for problems with no workaround and 100% within five days for problems with work-arounds..</li></ul>



**Attachment A**  
**Additional Measures Proposed by CLECs**  
**Appendix A- Disaggregation**

**A. Multi-Functional Disaggregation**

1. Interface type—for preordering, ordering, billing and maintenance and repair OSS
2. Dispatch in, dispatch out, and non-dispatch—for provisioning and maintenance measures
3. Volume—for ordering, provisioning, and maintenance measures (a) 1-5 lines, (b) 6-14 lines, and (c) 15+ lines
4. Geographic --All measures should be disaggregated to a state level, if the data is available. Additionally, provisioning and maintenance measures should be disaggregated to the MSA level
5. By CLEC, BST, and all BST affiliates for all measures
6. Center—for ordering & maintenance service center measures

**B. Product Disaggregation for Ordering and Provisioning**

1. UNE Platform
2. Other UNE Combos
3. UNE Channelized DS1 (DS1 loop + multiplexing)
4. UNE Enhanced Extended Link (loop+multiplexing + interoffice transport)
5. Unbundled 8 dB Analog Loops
6. Unbundled 2-wire Digital Loops
7. Unbundled 4-wire Digital Loops
8. Unbundled ADSL Loops
9. Unbundled HDSL Loops
10. Unbundled xDSL Loops
11. Unbundled Copper Loops (UCL)
12. Other Unbundled Loops
13. Sub-loop unbundling
14. ILNP
15. PNP
16. Line Sharing / High Frequency Spectrum Network Element
17. UNE Analog Switch Port (line side)
18. UNE BRI Capable Switch Port (line side)
19. UNE DS1 Switch Port (line side)
20. UNE PRI Switch Port (trunk side)
21. UNE DID-capable Switch Port (trunk side)
22. UNE Message Trunk Port
23. UNE Dedicated DS0 Transport
24. UNE Dedicated DS1 Transport
25. UNE Dedicated DS3 Transport
26. Interconnect Trunks (DS0s, DS1s and DS3s,)
27. Two-Way Trunking, Inbound Augments, separately
28. Resold Residence POTS
29. Resold Business POTS
30. Resold BRI ISDN
31. Resold PRI ISDN
32. Resold Centrex/Centrex-like
33. Resold Analog PBX trunks
34. Resold DID Trunks
35. Resold Voice-Grade Private Line
36. Resold DS1 Services
37. Resold DS3 Services
38. Resold >DS3 Services
39. Other Resold Services)

**ATTACHMENT B**  
**Sample ILEC PM Results Summary Report**

STANDARD REPORTING FIELDS FOR A PM RESULTS SUMMARY REPORT						THESE FIELDS WOULD BE REPORTED FOR EACH OF THE 12 MONTHS				
PM#	PM CATEGORY	PM NAME	STANDARD	BENCHMARK	GEO AREA	CLEC OBSV	CLEC VALUE	ILEC VALUE	Z-VALUE	RESULT
1-01	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Address Verification - DATAGATE	Benchmark	4.7	CO	x	3.2		(1.50)	Pass
1-02	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Req. for Telephone Number - DATAGATE	Benchmark	4.5	CO	x	3.2		(1.30)	Pass
1-03	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Req. for CSR - DATAGATE	Benchmark	6.6	CO	x	3.8		(2.80)	Pass
1-04	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Serv. Availability - DATAGATE	Benchmark	6.6	CO	x	0.8		(5.80)	Pass
1-05	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Serv. Appointment Scheduling - DATAGATE	Benchmark	1.0	CO	x	0.5		(0.50)	Pass
1-06	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Dispatch Required - DATAGATE	Benchmark	12.6	CO	x	9.4		(3.20)	Pass
1-07	Pre-Ordering	Avg. Resp. for OSS Pre-Order - PIC - DATAGATE	Benchmark	28.0	CO	x	21.2		(6.80)	Pass
1-08	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Address Verification - VERIGATE	Benchmark	4.7	CO	x	5.5		0.79	Pass
1-09	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Req. for Telephone Number - VERIGATE	Benchmark	4.5	CO	x	2.5		(2.01)	Pass
1-10	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Req. for CSR - VERIGATE	Benchmark	6.6	CO	x	2.6		(3.96)	Pass
1-11	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Serv. Availability - VERIGATE	Benchmark	6.6	CO	x	3.1		(3.46)	Pass
1-12	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Serv. Appointment Scheduling - VERIGATE	Benchmark	1.0	CO	x	0.5		(0.46)	Pass
1-13	Pre-Ordering	Avg. Resp. for OSS Pre-Order - Dispatch Required - VERIGATE	Benchmark	12.6	CO	x	8.6		(3.97)	Pass
1-14	Pre-Ordering	Avg. Resp. for OSS Pre-Order - PIC - VERIGATE	Benchmark		CO	x	19.2		n/a	-
2-01	Pre-Ordering	Avg. Resp. Rec. within 12 sec. - Address Verification - DATAGATE	Benchmark	95.0%	CO	x	98.6%		(3.60)	Pass
2-02	Pre-Ordering	Avg. Resp. Rec. within 9.5 sec. - Req. for Telephone Number - DATAGATE	Benchmark	95.0%	CO	x	98.6%		(3.60)	Pass
2-03	Pre-Ordering	Avg. Resp. Rec. within 13 sec. - Req. for CSR - DATAGATE	Benchmark	95.0%	CO	x	99.1%		(4.10)	Pass
2-04	Pre-Ordering	Avg. Resp. Rec. within 16 sec. - Service Availability - DATAGATE	Benchmark	95.0%	CO	x	99.9%		(4.90)	Pass
2-05	Pre-Ordering	Avg. Resp. Rec. within 2 sec. - Serv. Appointment Scheduling - DATAGATE	Benchmark	95.0%	CO	x	98.8%		(3.80)	Pass
2-06	Pre-Ordering	Avg. Resp. Rec. within 25 sec. - Dispatch Required - DATAGATE	Benchmark	95.0%	CO	x	99.8%		(4.80)	Pass
2-07	Pre-Ordering	Avg. Resp. Rec. within 60 sec. - PIC - DATAGATE	Benchmark	95.0%	CO	x	99.1%		(4.10)	Pass
2-08	Pre-Ordering	Avg. Resp. Rec. within 7 sec. - Address Verification - VERIGATE	Benchmark	90.0%	CO	x	85.8%		4.25	Fail
2-09	Pre-Ordering	Avg. Resp. Rec. within 6 sec. - Req. for Telephone Number - VERIGATE	Benchmark	80.0%	CO	x	80.0%		0.02	Pass
2-10	Pre-Ordering	Avg. Resp. Rec. within 10 sec. - Req. for CSR - VERIGATE	Benchmark	90.0%	CO	x	98.5%		(8.49)	Pass
2-11	Pre-Ordering	Avg. Resp. Rec. within 13 sec. - Service Availability - VERIGATE	Benchmark	90.0%	CO	x	97.9%		(7.85)	Pass
2-12	Pre-Ordering	Avg. Resp. Rec. within 3 sec. - Service Appointment Scheduling - VERIGATE	Benchmark	90.0%	CO	x	99.0%		(9.01)	Pass
2-13	Pre-Ordering	Avg. Resp. Rec. within 19 sec. - Dispatch Required - VERIGATE	Benchmark	90.0%	CO	x	97.2%		(7.20)	Pass
2-14	Pre-Ordering	Avg. Resp. Rec. within 'x' sec. - PIC - VERIGATE	Benchmark		CO	x	n/a		n/a	-
3-01	Pre-Ordering	EASE Average Response Time	Parity		TX	x	0.71	0.74	0.00	Pass
4-01.1	Pre-Ordering	OSS Interface Availability - DATAGATE	Benchmark	99.5%	CO	x	100.0%		(0.50)	Pass
4-01.2	Pre-Ordering	OSS Interface Availability - VERIGATE	Benchmark	99.5%	CO	x	100.0%		(0.50)	Pass
4-01.3	Pre-Ordering	OSS Interface Availability - LEX	Benchmark	99.5%	CO	x	100.0%		(0.50)	Pass
4-01.4	Pre-Ordering	OSS Interface Availability - EDI	Benchmark	99.5%	CO	x	100.0%		(0.50)	Pass
4-01.5	Pre-Ordering	OSS Interface Availability - TOOLBAR	Benchmark	99.5%	CO	x	100.0%		(0.50)	Pass
4-01.6	Pre-Ordering	OSS Interface Availability - LRAF	Benchmark	99.5%	CO	x	100.0%		(0.50)	Pass
4-02	Pre-Ordering	Consumer EASE Availability	Benchmark	99.5%	TX	x	100.0%		0.00	Pass
4-03	Pre-Ordering	Business EASE Availability	Benchmark	99.5%	TX	x	100.0%		0.00	Pass
5-01	Pre-Ordering	% FOCs Rec. Within 5 Hours - Residence and Simple Business - LEX	Benchmark	95.0%	TX	x	95.8%		(0.84)	Pass
5-02	Pre-Ordering	% FOCs Rec. Within 24 Hours - Complex Business (1 - 200 Lines) - LEX	Benchmark	94.0%	TX	x	93.4%		0.59	Pass

**CLEC Proposed Disaggregation  
(Process Level)**

<b>Disaggregation</b>
<p><b>A. Pre-Order OSS Responsiveness</b></p> <ol style="list-style-type: none"> <li>1. Feature Function Availability/Service Availability</li> <li>2. Facility Availability Qualification of Loops for Advanced Digital Services</li> <li>3. Street Address Validation</li> <li>4. Appointment Scheduling</li> <li>5. Customer Service Records</li> <li>6. Telephone Number</li> <li>7. Rejected or Failed Queries (regardless of type)</li> </ol>
<p><b>B. Maintenance &amp; Repair OSS Responsiveness</b></p> <ol style="list-style-type: none"> <li>1. Create (or confirm logging of) a Maintenance Request</li> <li>2. Obtain Status</li> <li>3. Obtain Test Results</li> <li>4. Cancel Request</li> <li>5. Rejected or Failed Queries (regardless of type)</li> <li>6. Clearance Notification</li> <li>7. Closure Notification</li> </ol>
<p><b>C. Collocation</b></p> <ol style="list-style-type: none"> <li>1. Physical Caged</li> <li>2. Shared Caged</li> <li>3. Cageless</li> <li>4. Adjacent On-Site</li> <li>5. Adjacent Off-Site</li> <li>6. Augment to Physical</li> <li>7. Virtual</li> <li>8. Augment to Virtual</li> </ol>
<p><b>D. Multi-Functional Disaggregation</b></p> <ol style="list-style-type: none"> <li>1. Interface type—for preordering, ordering, billing and maintenance and repair OSS</li> <li>2. Dispatch and non-dispatch—for provisioning and maintenance measures</li> <li>3. Volume—for ordering, provisioning, and maintenance measures (a) 1-5 lines, (b) 6-14 lines, and (c) 15+ lines</li> <li>4. Geographic --All measures should be disaggregated to a state level, if the data is available. Additionally, provisioning and maintenance measures should be disaggregated to the MSA level</li> <li>5. By CLEC, BST, and all BST affiliates for all measures</li> <li>6. Center—for OS/DA, ordering &amp; maintenance service center measures</li> </ol>
<p><b>E. Service Order Activities</b></p> <ol style="list-style-type: none"> <li>1. New Service Installations</li> <li>2. Service Migrations Without Changes</li> <li>3. Service Migrations With Changes</li> <li>4. Local Number Porting</li> <li>5. Inside Move</li> <li>6. Outside Move</li> <li>7. Records Change</li> <li>8. Feature Changes</li> <li>9. Service Disconnects</li> <li>10. Translation Disconnects</li> <li>11. Standalone Directory Listing (DL)</li> <li>12. Standalone Directory Assistance (DA) Listing</li> </ol>

<b>Disaggregation</b>
<b>13. Standalone DL &amp; DA Activity</b>
<b>F. Billing</b>
1. Record Type (resale, interconnection, UNE)

<b>Disaggregation, Analogs and Benchmarks</b>		
<b>G. Product Level Disaggregation for (Ordering, Provisioning, and Maintenance &amp; Repair)</b>	<b>Benchmark-- 95% within x Days unless otherwise noted (resale) for <u>Order Completion Interval</u></b>	<b>Retail analog for other provisioning and maintenance and repair measures</b>
1. Resold Residence POTS	1. Retail Analog	1. Retail Analog
2. Resold Business POTS	2. Retail Analog	2. Retail Analog
3. Resold BRI ISDN	3. Retail Analog	3. Retail Analog
4. Resold PRI ISDN	4. Retail Analog	4. Retail Analog
5. Resold Centrex/Centrex-like	5. Retail Analog	5. Retail Analog
6. Resold Analog PBX trunks	6. Retail Analog	6. Retail Analog
7. Resold DID Trunks	7. Retail Analog	7. Retail Analog
8. Resold Voice-Grade Private Line	8. Retail Analog	8. Retail Analog
9. Resold DS1 Services	9. Retail Analog	9. Retail Analog
10. Resold DS3 Services	10. Retail Analog	10. Retail Analog
11. Resold >DS3 Services	11. Retail Analog	11. Retail Analog
12. Other Resold Services	12. Retail Analog	12. Retail Analog
13. UNE Platform	13. Retail POTS	13. Retail POTS
14. UNE Channelized DS1 (DS1 loop + multiplexing)	14. 3, 7, and 10 days, for a ,b, and c, volumes respectively	14. DS1
15. Unbundled 8 dB Analog Loops	15. Same as above	15. Retail POTS
16. Unbundled 2-wire Digital Loops	16. Same as above	16. Retail POTS
17. Unbundled 4-wire Digital Loops	17. Same as above	17. Retail POTS
18. Unbundled ADSL Loops	18. Same as above	18. DS1
19. Unbundled HDSL Loops	19. Same as above	19. DS1
20. Unbundled xDSL Loops	20. Same as above	20. DS1
21. Other Unbundled Loops	21. Same as above	21. DS1
22. UNE Analog Switch Port (line side)	22. 2 days	22. POTS
23. UNE BRI Capable Switch Port (line side)	23. 3 days	23. ISDN
24. UNE DS1 Switch Port (line side)	24. 5 days	24. DS1
25. UNE PRI Switch Port (trunk side)	25. 5 days	25. ISDN
26. UNE DID-capable Switch Port (trunk side)	26. 5 days	26.
27. UNE Message Trunk Port	27. 5 days	27. DS1
28. UNE Dedicated DS0 Transport	28. 3, 7, and 10 days, for a ,b, and c, volumes respectively	28. DS1
29. UNE Dedicated DS1 Transport	29. Same as above	29. DS1
30. UNE Dedicated DS3 Transport	30. Same as above	30. DS3
31. Interconnect Trunks (DS0s, DS1s and DS3s,)	31. ILEC Trunks	31. ILEC Trunks
32. Two-Way Trunking, Inbound Augments, separately)	32. ILEC Trunks	32. ILEC Trunks

<b>Disaggregation, Analogs and Benchmarks</b>		
<b>G. Product Level Disaggregation for (Ordering, Provisioning, and Maintenance &amp; Repair)</b>	<b>Benchmark-- 95% within x Days unless otherwise noted (resale) for <u>Order Completion Interval</u></b>	<b>Retail analog for other provisioning and maintenance and repair measures</b>
33. ILNP	33. 3, 7, and 10 days, for a, b, and c, volumes respectively	33. Retail POTS
34. PNP or LNP	34. Same as above	34. Retail POTS
35. Line-sharing/High Frequency Spectrum UNE	35. 3, 5 and 7 days for a, b and c, volumes	35. Retail POTS
36. Sub-loop unbundling, e.g. network terminating wire	36. 5, 7, 10 days for a, b, and c, volumes	36. Retail POTS
37. Loop Modification/Loop Conditioning	37. 5, 7, 10 days for a, b, and c volumes.	37. Retail POTS