

J. PHILLIP CARVER  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

October 31, 2002

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 000121A-TP (OSS)**

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Comments In Response To KPMG Adequacy Study, which we ask that you file in the referenced docket.

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

Sincerely,

  
J. Phillip Carver (KA)

Enclosures

cc: All parties of record  
Marshall M. Criser, III  
Nancy B. White  
R. Douglas Lackey

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE**  
**Docket No. 000121A-TP**

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

U. S. Mail this 31<sup>st</sup> day of October, 2002 to the following:

Jason K. Fudge  
Tim Vaccaro  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6181  
Fax. No. (850) 413-6250  
[jfudge@psc.state.fl.us](mailto:jfudge@psc.state.fl.us)

AT&T  
Virginia C. Tate  
Senior Attorney  
1200 Peachtree Street  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-4922  
[vtate@att.com](mailto:vtate@att.com)

Verizon, Inc.  
Kimberly Caswell  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Tel. No. (813) 483-2617  
Fax. No. (813) 223-4888  
[kimberly.caswell@verizon.com](mailto:kimberly.caswell@verizon.com)

Nanette Edwards (+)  
Regulatory Attorney  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Scott A. Sapperstein  
Intermedia Communications, Inc.  
One Intermedia Way  
M.C. FLT-HQ3  
Tampa, Florida 33647-1752  
Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923  
[sasapperstein@intermedia.com](mailto:sasapperstein@intermedia.com)

Charles J. Pellegrini  
Katz, Kutter, Haigler, Alderman, Bryant  
& Yon, P.A.  
106 East College Avenue  
Suite 1200  
Tallahassee, FL 32301  
Counsel for Intermedia  
Tel. No. (850) 577-6755  
Fax No. (850) 222-0103  
[jpellegrini@katzlaw.com](mailto:jpellegrini@katzlaw.com)  
Counsel for Intermedia  
[charlesp@katzlaw.com](mailto:charlesp@katzlaw.com)

Peter M. Dunbar, Esquire  
Karen M. Camechis, Esquire  
Pennington, Moore, Wilkinson,  
Bell & Dunbar, P.A.  
Post Office Box 10095 (32302)  
215 South Monroe Street, 2nd Floor  
Tallahassee, FL 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
[pete@penningtonlawfirm.com](mailto:pete@penningtonlawfirm.com)

Brian Chaiken  
Supra Telecommunications and  
Information Systems, Inc.  
2620 S. W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4248  
Fax. No. (305) 443-1078  
[bchaiken@stis.com](mailto:bchaiken@stis.com)

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Susan Masterton  
Charles J. Rehwinkel  
Sprint  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, Florida 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Donna Canzano McNulty (+)  
MCI WorldCom, Inc.  
325 John Knox Road  
The Atrium, Suite 105  
Tallahassee, FL 32303  
Tel. No. (850) 422-1254  
Fax. No. (850) 422-2586  
[donna.mcnulty@wcom.com](mailto:donna.mcnulty@wcom.com)

Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5493  
Fax. No. (770) 284-5488  
[brian.sulmonetti@wcom.com](mailto:brian.sulmonetti@wcom.com)

William Weber, Senior Counsel  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor, Promenade II  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (508) 300-7749  
[wweber@covad.com](mailto:wweber@covad.com)

John Rubino  
George S. Ford  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, Florida 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
[gford@z-tel.com](mailto:gford@z-tel.com)

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, et. al  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Represents KMC Telecom  
Represents Covad  
Represents Mpower

Jonathan E. Canis  
Michael B. Hazzard  
Kelley Drye & Warren, LLP  
1200 19th Street, N.W., Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792  
[jacanis@kelleydrye.com](mailto:jacanis@kelleydrye.com)  
[mhazzard@kelleydrye.com](mailto:mhazzard@kelleydrye.com)

**Tad J. (T.J.) Sauder**  
Manager, ILEC Performance Data  
Birch Telecom of the South, Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108  
Tel. No. (816) 300-3202  
Fax. No. (816) 300-3350

**John D. McLaughlin, Jr.**  
KMC Telecom  
1755 North Brown Road  
Lawrence, Georgia 30043  
Tel. No. (678) 985-6262  
Fax. No. (678) 985-6213  
[jmclau@kmctelecom.com](mailto:jmclau@kmctelecom.com)

**Andrew O. Isar**  
Miller Isar, Inc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335-8349  
Tel. No. (253) 851-6700  
Fax. No. (253) 851-6474  
[aisar@millerisar.com](mailto:aisar@millerisar.com)

**Richard D. Melson**  
Hopping Green Sams & Smith  
Post Office Box 6526  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
[rickm@hgss.com](mailto:rickm@hgss.com)

**Norman H. Horton, Jr. (+)**  
Messer, Caparello & Self  
215 South Monroe Street  
Suite 701  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Represents e.spire  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
[nhorton@law.fl.a.com](mailto:nhorton@law.fl.a.com)

**Renee Terry, Esq.**  
e.spire Communications, Inc.  
7125 Columbia Gateway Drive  
Suite 200  
Columbia, MD 21046  
Tel. No. (301) 361-4298  
Fax. No. (301) 361-4277

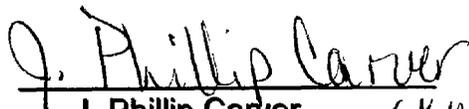
**John Kerkorian**  
Mpower Communications, Corp.  
5607 Glenridge Drive  
Suite 300  
Atlanta, GA 30342  
Tel. No. (404) 554-1217  
Fax. No. (404) 554-0010  
[jkerkorian@mpowercom.com](mailto:jkerkorian@mpowercom.com)

**Suzanne F. Summerlin, Esq.**  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301  
Tel. No. (850) 656-2288  
Fax. No. (850) 656-5589  
[summerlin@nettally.com](mailto:summerlin@nettally.com)

**Dulaney O'Roark III (+)**  
WorldCom, Inc.  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
[De.OROark@mci.com](mailto:De.OROark@mci.com)

Claudia E. Davant  
AT&T  
State President Legislative and  
Regulatory Affairs  
101 N. Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
Fax. No. (850) 425-6361  
[cdavant@att.com](mailto:cdavant@att.com)

Wayne Stavanja/Mark Buechele  
Ann Shelfer  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 200  
Tallahassee, FL 32301  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522

  
\_\_\_\_\_  
J. Phillip Carver (KA)

**(+) Signed Protective  
Agreement**

#237366

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re: )  
 )  
Performance Measurements for ) Docket No. 000121A-TP  
Telecommunications Interconnection, )  
Unbundling and Resale )  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S COMMENTS  
IN RESPONSE TO KPMG ADEQUACY STUDY**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Comments In Response To KPMG Adequacy Study and states the following:

1. On September 22, 2002, the Staff of the Florida Public Service Commission ("Commission") provided to BellSouth a copy of the "BellSouth Permanent Metrics Adequacy Study"<sup>1</sup> prepared by KPMG Consulting Inc. ("KPMG") and issued in September of 2002<sup>2</sup>. On a subsequent telephone conference, the Staff informed BellSouth that written responsive Comments must be provided by October 31, 2002. BellSouth hereby provides its Comments.

For each measurement that is addressed, the KPMG Report contains an SQM Definition and a list of findings. The findings are grouped into three categories, 1) Documentation Improvements (red-line changes), 2) SQM Issues and 3) Recommended SQM Changes. In its response, BellSouth has followed this structure. BellSouth's Comments focus primarily on the areas in which BellSouth disagrees with KPMG's

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<sup>1</sup> Hereinafter, "Adequacy Study" or "Report."

<sup>2</sup> BellSouth has been informed that KPMG has subsequently changed its name to Bearing Point. However, since the document to which BellSouth is responding bears the name "KPMG Consulting," BellSouth will, for clarity's sake, refer to the firm by this name.

findings, but BellSouth also notes herein a number of proposed changes with which it agrees.

**A. OPERATIONS SUPPORT SYSTEMS (OSS)**

**1. OSS-1: Average Response Time and Percent Within Interval  
(Pre-Ordering/Ordering)**

SQM Issues: KPMG notes that the BellSouth SQM does not present a direct retail analog for each contract, which results in uncertainty as to how the parity + 2 seconds standard can be applied without a documented retail analog. Specifically, the Report states that “values are only reported for certain Alternative Local Exchange Carrier (ALEC) interfaces for certain contracts, e.g. ‘TAGCSR.’ While this may be appropriate, without a documented retail analog, KPMG Consulting is uncertain how the parity + 2 seconds standard can be applied.” (Report, p. 5). There would appear to be several issues leading to KPMG’s concern. BellSouth will respond to each below:

The first issue noted by KPMG is that the Performance Standard section in the SQM Disaggregation – Analog / Benchmark table should be clarified. Specifically, the BellSouth SQM dated January 2002 that was reviewed by KPMG has an analog / benchmark table listing several systems used in ALEC preordering. On the right hand side of the table, the retail analog is noted as Parity + 2 seconds without a further definition of the systems to which the 2-second interval should apply. BellSouth agrees with KPMG’s recommendation regarding clarification and will incorporate a clearer comparison of the OSS response intervals for ALEC queries to the response intervals for BellSouth retail queries. The following illustrates these comparisons:

Response interval for LENS	Retail analog
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RSAG, by TN (seconds)	RNS RSAG, by TN + 2 sec ROS RSAG, by TN + 2 sec
RSAG, by ADDR (seconds)	RNS RSAG, by ADDR + 2 sec ROS RSAG, by ADDR + 2 sec
ATLAS (seconds)	RNS ATLAS + 2 sec ROS ATLAS + 2 sec
DSAP (seconds)	RNS DSAP + 2 sec ROS DSAP + 2 sec
CRSECSRL (seconds)	RNS CRSACCTS + 2 sec ROS CRSOCSR + 2 sec
COFFI (seconds)	RNS OASISBIG + 2 sec ROS OASISBIG + 2 sec
PSIMS/ORB (seconds)	RNS OASISBIG + 2 sec ROS OASISBIG + 2 sec

<b>TAG response interval</b>	<b>Retail analog</b>
RSAG, by TN (seconds)	RNS – RSAG, by TN + 2 sec ROS – RSAG, by TN + 2 sec
RSAG, by ADDR (seconds)	RNS – RSAG, by ADDR + 2 sec ROS – RSAG, by ADDR + 2 sec
ATLAS – MLH (seconds)	Diagnostic Diagnostic
ATLAS – DID (seconds)	Diagnostic Diagnostic
ATLAS – TN (seconds)	RNS – ATLAS – TN + 2 sec ROS – ATLAS – TN + 2 sec
DSAP (seconds)	RNS – DSAP + 2 sec ROS – DSAP + 2 sec
TAG – CSR (seconds)	RNS – CRSACCTS + 2 sec ROS – CRSOCSR + 2 sec

The second performance standard issue raised by KPMG is an uncertainty in how to apply a parity + 2 standard when the retail analog is RNS for residence transactions and ROS for business transactions, while the ALEC interfaces, LENS and TAG, submit both residence and business transactions. BellSouth believes that parity can be demonstrated when the ALECs are being provided pre-ordering information in substantially the same time as pre-ordering information is being provided for BellSouth retail queries. The Commission can quickly determine if the intervals are substantially

the same by comparing ALEC queries from LENS and TAG to the analogous queries from RNS and ROS.

Finally, and importantly, BellSouth would note that while the system architecture for ALEC preordering queries differs slightly from the system architecture for retail preordering queries, the reported OSS response intervals are very similar. In August 2002, the reported OSS response intervals for all queries, ALEC and BellSouth retail interfaces to all legacy systems, was less than 4.6 seconds and the weighted average was 2 seconds for all ALEC queries and 3 seconds for all BellSouth retail queries. So, while there are differences in the system architecture, the actual OSS response intervals are, in fact, substantially the same.

**B. Ordering (O)**

**1. O-3: Percent Flow-Through Service Requests (Summary)**

Recommended SQM Changes – Levels of Disaggregation: KPMG makes two recommendations: 1) revise the existing UNE disaggregation to separate it into UNE-P and UNE Loops; 2) establish a standard of 95% for the newly disaggregated UNE-P category. For the reasons stated below, KPMG’s rationale for making this proposal is flawed and the proposed standard of 95% is unreasonable.

To address first KPMG’s recommendation to further disaggregate this measurement, BellSouth believes there is no need to do so. The Commission currently has four categories on which to evaluate BellSouth’s OSS capability to automatically process electronically submitted LSRs. These categories are Residence, Business, UNE and LNP. UNE-P is already included in the UNE

category. Thus, the addition of another disaggregation category would provide no additional information on OSS flow through. To the contrary, if KPMG's recommendations were implemented, there would actually be less information captured in the revised measurement than is measured by the existing metric. To clarify, KPMG is recommending that the UNE disaggregation be separated into two groups: UNE-P and UNE Loops. However there are also a number of other UNE LSRs that would not be measured for flow-through if the categorization were limited to UNE-P and UNE Loops. As examples, UNE Combinations – other than UNE-P, UNE Directory Listings, and UNE Switch Ports would not be captured in the disaggregation as proposed by KPMG. These are being measured in the current metric.

Thus, while BellSouth is not strongly opposed to providing the disaggregation recommended by KPMG, BellSouth does not believe there is any need for this additional disaggregation. The more problematic aspect of this proposal is that KPMG, after advocating disaggregation, then advocates that the newly disaggregated UNE-P measure have a 95% benchmark.

BellSouth is strongly opposed to KPMG's recommendation that the benchmark for UNE-P be established at 95%. KPMG's recommendation that UNE-P should have a 95% benchmark appears to be based on the conclusions that 1) Residential Resale currently has a 95% benchmark, and 2) UNE-P is like residential resale because the same group in BellSouth's LCSC manually handles resale orders and UNE-P orders when they fall out. This, however, is simply flawed logic.

The main reason that the resale group handles UNE-P fallout is that UNE-P involves features, whereas UNE loop orders, by definition, do not. The resale group is familiar with features and training this group to handle UNE-P orders is more efficient than training the UNE group to handle features. However, the way that orders are handled once they fall out has nothing to do with the OSS's ability to translate an LSR into a service order, which is what flow-through measures. Put differently, the purpose of the measure is to address flow-through, not the manner in which orders are handled when they do not flow through.

In this regard, it is important to note that measurement O-3 is defined as "The percentage of Local Service Requests (LSR) and LNP Local Service Requests (LNP LSRs) submitted electronically via the ALEC mechanized ordering process that flow through and reach a status for a FOC to be issued, without manual intervention." This definition clearly states that manual processes are not relevant to this measurement. The flow through measurement simply measures BellSouth's OSS ability to process an electronically submitted LSR. It does not measure what happens to the LSR if BellSouth's systems do not process the LSR without manual intervention. Nevertheless, KPMG has focused on manual processes and procedures in a misguided attempt to define a standard for a completely electronic process, which, again, has nothing to do with a manual process.

Also, KPMG appears to conclude that the physical work required to provide UNE-P has little in common with the physical work required to provide UNE Loop service. It is not clear if KPMG is referring to order processing or provisioning.

Assuming that KPMG is referring to the provisioning of UNE-P, KPMG's conclusion is incorrect. UNE-P involves a UNE Loop and a switching port on BellSouth's switch. A UNE Loop involves a UNE Loop (obviously) and a switching port on the ALEC's switch. The physical connections are very similar, and the only difference is that the connection point to BellSouth's port is located at a different point on the main distributing frame in the central office than the connection to the ALEC's port. Once again, however, this has nothing to do with the measurements, processes and benchmarks for OSS flow through.

Given the fact that measurement 0-3 is ultimately a flow-through measurement, it is appropriate to consider KPMG's recommendation in light of the FCC's current handling of this type of measurement. Viewed in this context, KPMG's proposal cannot be squared with the approach taken by the FCC.

The FCC has found that BellSouth's OSS systems are currently capable of flowing through UNE orders in a manner that allows competitive carriers a meaningful opportunity to compete, at the current benchmarks for flow through. The FCC also found, in the recent Order granting BellSouth's entry into long distance in North Carolina, South Carolina, Alabama, Mississippi and Kentucky, that the ability of orders to flow through BellSouth's OSS is dependent, in part, on the ALECs<sup>3</sup>. For example, in this Order, the FCC stated the following:

We have previously stated that a BOC's ability to flow-through orders at high rates is dependent, in part, on the performance of competing carriers to place orders electronically. We find it particularly informative that several competing carriers are achieving much higher flow-through rates

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<sup>3</sup> *In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina*, WC Docket No. 02-150, *Memorandum Opinion and Order*, FCC 02-260 (rel. Sept. 18, 2002) ("Memorandum Opinion").

than other carriers. Specifically, data regarding UNE orders shows that the flow-through rates of the top five competitive LECs range from 77.06 percent to 94.64 percent for the first quarter of 2002. In addition, flow-through rates for three of these competitive LECs range from 90.19 percent to 94.64 percent during the first quarter. During the second quarter of 2002, data regarding UNE orders shows that the flow-through rates of the top five competitive LECs range from 75.50 percent to 95.10 percent. The flow-through rates for three of these competitive LECs range from 85.80 percent to 95.10 percent during the second quarter. This evidence indicates that BellSouth's systems are capable of flowing through UNE orders in a manner that allows competitive carriers a meaningful opportunity to compete. Because the record demonstrates that a number of competitive LECs experience high flow-through rates, we conclude that it is inappropriate to attribute the wide range of flow-through results entirely to BellSouth. As the Commission previously stated, a BOC is not accountable for orders that fail to flow-through due to competing carrier-caused errors. Our conclusion that BellSouth's OSS are capable of achieving high flow-through level is further bolstered by KPMG's Georgia testing.

(Memorandum Opinion, Par. 152) (emphasis added).

In the conference call of October 10, 2002, KPMG admitted that these key findings of the FCC were not considered in arriving at the recommended benchmark of 95%.

Aside from the fact that KPMG did not consider the FCC's findings on flow through and that KPMG's rationale for equating UNE-P with residence resale is fundamentally flawed, the recommendation for a 95% benchmark for UNE is simply unrealistic for a number of reasons.

One, UNE-P can be ordered with various combinations of USOCs and under a variety of activity types. BellSouth has not attempted to precisely define every combination of USOC and activity type that is capable of flow through without manual intervention. This would be a complex undertaking and is not practical. However, the

existing benchmark of 85% for UNE flow through is designed to recognize that not every combination of UNE will flow through.

Two, KPMG's suggestion that the UNE-P standard should be based on a standard derived from residential service ignores the typical uses of UNE-P. UNE-P can be used for both business and residence customers. The mix of residence and business UNE-P ordering can vary significantly from month to month in the aggregate. Also, there are unquestionably some ALECs who serve business customers either exclusively or primarily.

Three, UNE-P ordering parameters and USOCs are relatively new. UNE-P ordering only came into being after the UNE remand order. Since then, there has been explosive growth in UNE volumes. Primarily driven by UNE-P, electronic LSR submissions for UNEs for the three months, June through August 2002, reflect a 180% volume increase over submissions for that same time period in 2001. A relatively few ALECs account for most UNE P submissions. Based on August 2002 data, the top five ALECs (by volume) ordering UNEs represented 66% of the total electronic LSR submissions for UNEs. The top ALEC alone represented 36%, and the top two ALECs represented over 50%. Thus, overall flow-through results hinge on the type of LSRs these ALECs submit in accordance with their marketing and business plans. It is also important to note, from the data provided that the top 2 volume producers had flow-through results of 89.68% and 86.32% respectively. The next three ranged from 92% to 99%.

Four, some UNE-P USOC errors are cropping up that BellSouth has not seen before. In contrast, Resale and Retail USOCs have been in existence since 1996.

Again, the contemplated sub-measure for UNE-P is a flow through measurement, and a 95% benchmark for this type of measurement is not reasonable. Moreover, given the newness of UNE-P orders and the dramatic growth in UNE-P orders, KPMG's recommendation of a 95% benchmark is especially unrealistic. For all these reasons, BellSouth does not believe it appropriate to accept KPMG's proposed changes to the flow-through measurement.

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

Recommended SQM Changes: KPMG recommended the same changes as for O-3 above. BellSouth's response is also the same as for O-3 above.

**3. O-6 : ALEC LSR Information**

Documentation Improvements: KPMG proposes that the name of the measurement be modified to remove "O-6" from the SQM header. KPMG's rationale is that "this measurement has no calculation; it presents data that is used to assist in the calculation of O-3 and O-4. The removal of "O-6" from the SQM header would make it clear that this measurement has no calculation component." (Report, p. 16).

Even though this particular measurement contains no calculation component, it does contain several other very important components: Definition, Exclusions, Report Structure and Data Retained and the Flow-through Matrix. Accordingly, BellSouth believes that it is necessary to continue to identify this measurement in the SQM with the appropriate numbering scheme. BellSouth does agree with KPMG that the Flow-Through Matrix should be removed from the SQM and the SQM should make reference to the Matrix that is maintained separately.

**4. O-10: Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual.**

SQM Issues - Levels of Disaggregation: KPMG proposes that the “Levels of Disaggregation” section should be updated to include all transactions sent to the CRSG that require a service inquiry. These would include Centrex, Foreign Central Office / Foreign Exchange, and WATS. BellSouth respectfully disagrees. Disaggregation for this measurement is based on products that are expected to have significant measurable volumes, such as xDSL and Unbundled Interoffice Transport. From January through September 2002 (9 months), there were over 3000 inquiries for xDSL and nearly 400 for Unbundled Interoffice Transport. In contrast, the CRSG received only 57 inquiries for Centrex, 15 inquiries for FX, one inquiry for FCO and no inquiries for WATS during this same time frame. BellSouth does not believe that it is necessary or appropriate to disaggregate products such that some of the resulting product categories will have few or no inquiries. In this type of instance, developing and implementing the additional disaggregation will cause substantial costs to BellSouth, but serves no real purpose.

**5. O-11: Firm Order Confirmation and Reject Response Completeness.**

Recommended SQM Changes - Performance Standard: KPMG believes that the current benchmark of 95% is too low, “due to the potential impact to ALECs of not receiving FOCs or Rejects.” (Report, p. 26). The key issue raised by KPMG is that the ALECs may not be receiving an FOC or a Reject. BellSouth does not believe this situation exists. However, there are several situations that could cause the measurement of FOC and Reject Completeness to be less than 100%, even though the ALEC did receive an FOC or a Reject notification. One example of this occurs at the end of the

reporting period when the FOC or Reject notification is returned in one month for LSRs submitted in the prior month. In this instance, the measurement for the prior month would not indicate that the FOC or Reject was issued, even though it actually was issued.

Another example involves versions of the same LSR, sent at nearly the same time. In some instances, an FOC is returned on the later version, particularly when the order involves manual processing, such as might occur when BellSouth's representative is in contact with the ALEC representative to resolve ordering issues.

A third example of why the measurement may understate the percentage of FOCs or Rejects actually issued involves FOCs issued to acknowledge to the ALECs that a request to cancel an LSR has been processed. These FOCs were actually returned to the ALEC, however the coding necessary to capture these FOCs in the FOC and Reject Response Completeness measurement has not been implemented (implementation is scheduled for November). While corrective action has been taken to resolve this specific issue, there may be other yet-undiscovered unique situations that would prevent performance at near-perfection.

The above notwithstanding, BellSouth disagrees with KPMG's recommendation to increase the benchmark for this measurement above 95%. Without actually recommending the higher benchmark, KPMG notes that the test ALEC for the Third Party OSS Test in Florida applied a 99% benchmark. This is irrelevant since the KPMG test could not have replicated all of the real life situations encountered. Even in New York, where this measurement originated after the loss of a large volume of ALEC orders by the ILEC, the benchmark is 95%. Moreover, raising the benchmark to 99% would have the effect of allowing only 1 order out of 100 to not be reported in the current

period, as compared to 5 orders out of 100 under the current benchmark. This means that there would have to be a reduction of 80% (from 5 in 100 to 1 in 100) in the number of LSRs that do not have a measurable FOC or reject notice.

At the same time, the ALECs have proposed in the Commission's 6-month review of performance measurements a benchmark of 97% (a level that BellSouth also opposes). This benchmark would require a 40% reduction, and the ALECs have supplied no justification and demonstrated no need for an improvement of this magnitude. Still, even the unsupported raising of the benchmark advocated by the ALECs is less extreme than the 99% benchmark that KPMG implies is appropriate.

One essential problem with a 99% benchmark under any circumstances is that meeting this standard requires virtually perfect performance. In the case of this particular measurement, the potential is especially great for BellSouth to fail to achieve near perfection because of the possible actions of the ALECs, i.e., the patterns of order submission near the end of the reporting period. For example, an ALEC could send in LSRs in large volumes, either late in the month or even on the last day of the month, that would skew the results for this measurement and make it virtually impossible for BellSouth to achieve a 97% benchmark, much less a 99% benchmark. Also, this measurement includes both partially mechanized and non-mechanized LSRs, which, by definition, require more than a day for the return of an FOC or Reject. Consequently, if an ALEC were to submit a large volume of these types of LSRs at the end of the month, then either an FOC or Reject response would be returned the following month. This, too, would make it virtually impossible to meet a 99% benchmark for this measurement, even though the time to provide the FOC or Reject had not elapsed.

For all the reasons noted above, BellSouth strongly recommends that the benchmark for this measurement remain at 95%.

**6. 0-12: Speed of Answer in Ordering Center**

Documentation Improvement – Exclusions: KPMG proposes to list abandoned calls as an exclusion. BellSouth disagrees in part. BellSouth already excludes the number of abandoned calls from the calculation. However, this measurement includes the time in queue for both abandoned calls and calls that are answered. In other words, the Speed of Answer time is currently calculated by dividing the hold time for all calls, both those answered and those abandoned, by the number of calls answered. The result is that the answer time is overstated, both for BellSouth’s retail operations and for the ALEC. Thus, the fact that this time is overstated has no adverse effect on the integrity of the measurement.

At the same time, it is not technologically possible of present at exclude from the total hold time the time attributable to abandoned calls. During the conference call of October 10, 2002, KPMG confirmed that at the time the Report was completed, KPMG was unaware of this fact. Thus, given both the limitation on current technological capability, and the fact that this “overstatement” is essentially neutral (i.e., it affects BellSouth and the ALECs equally), BellSouth submits that exclusion is not appropriate.

Recommended SQM Changes: KPMG recommends that the Commission consider “adding a diagnostic measurement to monitor ordering center abandoned call duration and volume.” (Report, p. 27). However, as stated above, it is not technologically possible to separate this time in a way that would allow for this diagnostic measure. Moreover, BellSouth would have absolutely no way of knowing

why a call was abandoned. It could be a wrong number, a customer hanging up to take another call, or simply a customer deciding to wait till later. There is no basis to assume that all abandoned calls are ALECs who have given up in frustration, which would be the only reason for this to be a separate measurement, even a diagnostic measurement.

**C. Provisioning (P)**

**1. P-1: Mean Held Order Interval & Distribution Interval**

SQM Issues: KPMG suggests that smaller time intervals be added to the current time intervals of >15 days and > 90 days “to provide a clearer distribution of past due orders.” (Report, p. 28). BellSouth believes that this addition is not necessary for several reasons. As a threshold matter, the number of Held Orders is very small. In August 2002, there were 24 Orders in Florida held at the end of the month. For comparison purposes, there were 115,028 orders completed during the month. Thus Held Orders represents only 0.02% of the total orders completed.

To address KPMG’s concerns that the time intervals for held orders need to be more granular than 15 and 90 days, BellSouth would note that held orders, in addition to being very small in volume, have no real impact on the end user unless they are held beyond the service due date. If orders are held beyond the service due date, this would result in missed appointments and longer order completion intervals. The Commission can monitor both of these conditions with the correlated measurements, Percent Missed Installation Appointments and Order Completion Interval, both of which have enforcement provisions. Since the impact on the end user is already addressed in these two correlated measures, expanding the granularity of the Held Order measurement serves no real purpose.

Performance Standard: KPMG concludes that the current retail analog for EELS, Retail DS1/DS3, is not appropriate. KPMG states that an EEL can consist of various combinations of voice-grade loops, DS0s, DS1s and DS3s, which KPMG does not consider to be equivalent to DS1s or DS3s (Report, p. 28). Therefore, KPMG recommends that the standard be changed to diagnostic until the Commission can collect and analyze data to assist in determining a proper performance measurement standard for the individual EEL types. BellSouth disagrees with KPMG's rationale for two reasons. One, EELS were initially assigned an analog of Retail DS1/DS3 because most EELS activity involves DS1/DS3. For example, the last four months (May-Aug) revealed that of the 2,715 EELS requests received, 2,704 (or an average of 99.59% of all EELS activity) were for DS1 or DS3. Two, like DS1/DS3, EELS' are designed services, whereas DS0s are less complex, non-design services. For both these reasons, BellSouth believes that the current retail analog is appropriate.

However, BellSouth does not object to making this measurement diagnostic for some period of time, as KPMG recommends, in order to gather additional data. BellSouth, in fact, anticipates that this data will eventually confirm the correctness of the current retail analog.

Finally, BellSouth notes that if KPMG's suggestion that EEL's be changed is adopted, consistency requires that other UNE combinations should be diagnostic as well. An EEL is one part of the broad product grouping referred to as UNE – Combinations. Some of these combinations are potentially considerably more complex than EELS. Thus, if the standard for EELS is changed to “diagnostic,” BellSouth would advocate that

other UNE Combinations also be changed to “diagnostic” since they also vary in complexity and in the mix of UNE elements.

**2. P-2: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices**

SQM Issues: Measurement P-2 actually has two distinct components: 1) a measurement of the jeopardy notice interval and, 2) a measurement of the percentage of orders given a jeopardy notice. In the last paragraph of the Performance Standard section on Page 29, KPMG appears to have confused the interval component of measurement P-2 with what KPMG terms as a ‘standard interval’ that typically refers to the time required to complete an order. In actuality, there is no ‘standard interval’ for providing a jeopardy notification. The Florida Commission has established a minimum interval of 48 hours in advance of the due date as the benchmark for the jeopardy notification interval. BellSouth concurs with this performance standard.

As an aside, the KPMG report is based on an earlier SQM that incorporated the two components of measurement P-2 discussed above. BellSouth’s recent proposal in the 6-month review of performance measurement clarifies these two measurements by separating them into measurement P-2A, Jeopardy Notice Interval and P-2B, Percentage of Orders given Jeopardy Notices. For measurement, P-2A, BellSouth has recommended a benchmark of  $95\% \geq 48$  hours for all products, including EELs. For P2-B, the Percentage of Orders Given Jeopardy Notices, BellSouth recommends adopting the retail analog of Retail DS1/DS3 for EELs, based on the discussion above in P-1.

**3. P-3: Percent Missed Installation Appointments**

KPMG recommends the complete removal of measurement P-3 because it was not ordered by the Commission. BellSouth disagrees. Due to the confusion regarding the interpretation of missed appointments, which includes subsequent missed appointments, BellSouth has proposed the elimination of measurement P-3A and the retention of measurement P-3. This has been discussed in the 6-month review workshops and additional detail will be provided in BellSouth's Comments that will be filed as part of the review process.

**4. P-3A: Percent Missed Installation Appointments Including Subsequent Appointments**

As mentioned above, BellSouth is proposing to eliminate this measurement and reinstate measurement P-3. However, BellSouth will respond to KPMG's recommended changes to measurement P-3A. These comments would also apply to measurement P-3.

Recommended SQM Changes: KPMG recommends changing the standard for EELs from a retail analog of Retail DS1/DS3 to a benchmark of  $\leq 5\%$ . BellSouth disagrees, and notes that this approach is inconsistent with the way in which KPMG addresses this issue in the context of other measures (e.g. P-1). KPMG advocates this change to a benchmark because it concludes that DS1/DS3 is not an appropriate retail analog for an EEL. As stated above, BellSouth disagrees with this conclusion. However, even if one accepts KPMG's conclusion, the remedy KPMG proposes, for example, in reference to P-1 is to treat the measure as diagnostic. KPMG offers no reason that the precise same perceived problem should lead to the conclusion that a benchmark of 5% or less is an appropriate standard for EELs in measurement P-3A. To the contrary, even if

KPMG is correct that the current retail analog is inappropriate, the only consistent solution is to make this measurement diagnostic as well.

Even if a benchmark were appropriate, BellSouth disagrees with KPMG's proposal for a benchmark for EELs of 5% for Missed Appointments. There is no reason for a benchmark. The FCC has consistently held that a retail analog should be used whenever one exists. Here, the dispute is over what analog to use, not whether one exists. EELS were initially assigned an analog of Retail DS1/DS3 because the majority of EELs activity involves DS1/DS3, and because DS1/DS3 is the electronic equivalent of an EEL. Again, data for the period of May-August, 2002 reveals that on average, 99.59% of all EELs activity is for DS1s or DS3s. The ALECs simply do not order EELs to deliver DSO levels of service. Given this, it is obvious that the appropriate standard is Retail DS1/DS3.

Moreover, in the conference call held on October 10, 2002, KPMG stated that they did not determine that missed appointments on EELs presented a specific performance problem that would necessitate a change in standards. In essence, the only reason that KPMG recommends a benchmark for missed appointments is the conclusion that EELs do not have a retail analog. Again, BellSouth believes that there is a retail analog for EELs. That issue aside, KPMG has not established any reason that the benchmark should be 5%, or any other number.

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

KPMG recommends adding measurement P-4 to the SQM, even though it was not ordered by the Commission. BellSouth is in agreement with KPMG's recommendation.

In fact, BellSouth has previously proposed the elimination of measurement P-4A (which includes measurement P-5, Completion Notice Interval) and the addition of measurement P-4. The Report states (p. 32) that “KPMG Consulting believes that both interval components provide useful information and should be reported.” This conclusion is consistent with BellSouth’s view that Order Completion Interval and the Completion Notice Interval are processes that are distinct and should not be combined under one measurement.

**6. P-4A: Average Order Completion and Completion Notice Interval (AOCCNI) Distribution**

Documentation Improvements – Business Rules: KPMG recommends two changes to the business rules: 1) that the language of the rules be updated to include completion notice interval; 2) that language regarding the interval calculation for zero due dates be eliminated to avoid confusion. Again, BellSouth advocates the elimination of measurement P-4A for the reasons discussed above. However, if this measurement is retained, then BellSouth would propose to modify the business rules so that the language clearly includes both completion notice interval and order completion interval.

KPMG also recommends changing the standard for EELs from a retail analog to diagnostic. BellSouth opposes this change for the reasons set forth above regarding Measurement P-1.

**7. P-5: Average Completion Notice Interval**

SQM Issues: KPMG recommends changing the standard for EELs from a retail analog to diagnostic. BellSouth's opposes the recommendation for the reasons stated above regarding measurement P-1.

**8. P-7: Coordinated Customer Conversion Interval**

Documentation Improvements – Report Structure: KPMG recommends changing the standard for this measurement from Parity by Design to Parity with Retail. KPMG states that “As part of FL Exception 154, BellSouth issued a red-line SQM regarding the documentation change of the performance standard from Parity by Design to Parity with Retail. The change is not present in the Permanent Metrics.” (Report, p. 37). BellSouth has reviewed Exception 154, the related Observation 142 and the associated red-line SQM and believes KPMG's statement is incorrect. None of these documents (which are attached as Composite Exhibit 1) contain the change from Parity by Design to Retail cited by KPMG. The only change noted in the red-line SQM is a clarification in the interval breakouts – or ‘time buckets.’ There is no change in the performance standard.

BellSouth seeks clarification on this recommendation by KPMG. Coordinated Customer Conversions (i.e., hot cuts) are performed solely for the ALECs. Since this is a service without a retail equivalent, BellSouth uses a benchmark of  $95\% \leq 15$  minutes. BellSouth believes this to be an inadvertent cutting and pasting error on the part of KPMG and not a recommendation to change the standard.

**9. P-9: % Provisioning Troubles within 30 days of Service Order Completion**

Recommended SQM Changes – Performance Standard: KPMG concludes that the retail analog for EELS, Retail DS1/DS3, is not appropriate because an EEL can consist of

various combinations of voice-grade loops, DS0s, DS1s and DS3s, and that these are not equivalent to DS1/DS3. Therefore, KPMG recommends that the standard be changed to  $\leq 5\%$ . As with measurement P-3A, BellSouth believes KPMG's recommendation for a 5% benchmark is inconsistent with KPMG's recommendation in other measurements that EELs be reported as a diagnostic, rather than compared to a retail analog or a benchmark. As noted in the discussion of measurement P-3A above, there are substantive reasons to conclude that the majority of EELs consists of DS1s and DS3s; therefore, using DS1/Ds3 as the retail analog is appropriate. The FCC has consistently held that a parity standard (i.e., analog) should be used when possible. In this case, there is an appropriate retail analog and it should be used.

During October 10, 2002 conference call, KPMG stated that the sole basis for recommending a benchmark of less than or equal to 5% was their experience with the Third Party Test. This experience is not relevant. Specifically, the test was limited in that it replicated the experience of only one ALEC. Moreover, the troubles inserted during the course of the Third Party Test were not of commercial volume. Again, the KPMG test was not designed to assess the ongoing level of performance that should be required.

Moreover, KPMG's conclusion that "EELs can consist of voice grade loops, DS0s, DS1s, or DS3s" (Report, p. 42) is inconsistent with the benchmark it proposes. The Provisioning Trouble Report Rate (P-9) results for these individual products are greater than the  $<5\%$  benchmark recommended by KPMG for an EEL. The following represents the Provisioning Trouble Report Rate results in Florida for August 2002:

2W Analog Loop Design <10 circuits / Dispatch	10.34%
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Digital Loop < DS1 < 10 ckts / Dispatch	8.28%
Digital Loop >= DS1 < 10 ckts / Dispatch	9.93%

Thus, if EELs were composed of these products to any significant degree (as KPMG appears to conclude), a 5% benchmark for a combination of these services is far too high.

Moreover, a benchmark of 5% or less brings into question the issue of exclusions for this measurement. Since BellSouth includes Code 7s (Test OK) in this measurement, KPMG's proposal to use a benchmark would create the opportunity for an ALEC to call in several troubles that are Code 7s to ensure a miss. Furthermore, since this measurement is a Tier 1 enforcement metric, this type of possible ALEC "gaming" would also result in payment to the ALEC for a trouble that does not exist.

**10. P-11: Service Order Accuracy**

KPMG recommends only that this measurement be updated to reflect geographic scope, i.e., the fact that the measurement is regional. BellSouth agrees with KPMG's recommendation.

**11. P-12: LNP Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution**

Recommended SQM Changes: KPMG has suggested two changes to this measurement: 1) the exclusion of trigger orders and, 2) the assignment of a 15-minute benchmark to the remaining non-trigger orders. BellSouth agrees with the intent of KPMG's first recommendation, but disagrees with the proposed 15-minute benchmark for non-trigger orders.

As an initial matter, BellSouth notes that it has proposed the elimination of this measurement in the Commission's current 6-month review of Performance Measurements. In its' place, BellSouth has proposed three new measurements:

1. Measurement P-12A, LNP- Percent Out of Service < 60 Minutes
2. Measurement P-12B, LNP- Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due
3. Measurement P-12C, LNP- Average Disconnect Timeliness Interval and Disconnect Timeliness Interval Distribution (Non-Trigger)

BellSouth is proposing these new measurements because the current measure does not accurately capture the customer's experience when the customer's telephone number is ported, and because the current measurement includes activities in the porting process over which BellSouth has no control. Based on similar proposals in other states, BellSouth believes the ALECs will concur in replacing measurement P-12 with the three new ones.

Regarding KPMG's recommendation to modify the existing measurement P-12 to eliminate trigger orders, this recommendation essentially results in the new measurement BellSouth has proposed as Measurement P-12C, LNP- Average Disconnect Timeliness Interval and Disconnect Timeliness Interval Distribution (Non-Trigger.) Thus, BellSouth concurs in the intent of KPMG's first recommendation.

BellSouth does not agree with the proposed use of a 15-minute benchmark for non-trigger orders. The process involved in porting circuits that do not have trigger orders is not an automated, electronic process where a short interval might apply. These conversions typically involve complex services such as DID trunks and the conversions

are normally project managed. During these conversions, the project manager waits for a positive confirmation from the ALEC that the ALEC has completed the number porting before BellSouth sends instructions to the switch translations group to process the disconnect order and remove the translations in BellSouth's switch. While BellSouth is waiting for this confirmation, the disconnect timeliness interval is being affected. Thus the timeliness of the disconnect is not under BellSouth's control. Additionally, the ALEC may begin the porting process for a customer without notifying BellSouth or conduct the porting process after hours (which ALECs are doing with greater frequency today). In either case, the porting process may begin and end without BellSouth becoming aware of the need to complete the disconnect order in the home switch, making it impossible for BellSouth to meet the  $95\% \leq 15$  minutes benchmark proposed by KPMG.

Also, although it is not a recommended change, on page 46 of the Adequacy Review KPMG states that "For orders where a 10-digit trigger has been provisioned, the  $95\% \leq 15$  Minutes benchmark is not appropriate; the time at which the switch translations are removed will not matter, since it will have no adverse effect on customers." BellSouth believes this statement oversimplifies the function of the 10-digit trigger order.

KPMG acknowledges the function of trigger orders in the Adequacy Review, but recommends, nevertheless, that trigger orders be excluded from the measurement. Thus, the measurement (with the changes proposed by KPMG) would calculate the end time of the LNP activity as the processing of the actual disconnect order in the host switch, even though, from a customer's perspective, this activity is totally meaningless. It is the activation of the LNP and the routing function accomplished by the LSMS that ultimately determines whether the end user is back in full service and is able to make and receive

calls when a trigger is used in porting a telephone number. KPMG's recommended removal of trigger orders from this measurement, coupled with the statement from page 46 referenced above, appears to imply that trigger orders are applied and processed automatically.

While BellSouth appreciates the faith that KPMG is placing in the number porting process, BellSouth continues to believe that it is important to retain measures to address trigger orders. Again, BellSouth has proposed two new measures for this purpose. Measurement P-12A captures the time when the end user is out of service. Measurement P-12B, LNP- Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due, assures that a trigger order is applied where it is appropriate.

**D. Maintenance & Repair (M&R)**

**1. M&R-2: Customer Trouble Report Rate.**

Recommended SQM Changes: KPMG is recommending that this measurement be redefined and renamed to exclude the word "reported." Under KPMG's proposal, the name would become "Customer Trouble Rate." At first glance, this documentation revision (which, according to KPMG, does not change the way the metric is calculated) seems minor. However, the phrase "Customer Trouble Report Rate" is a frequently used and commonly understood phrase throughout the telecommunications industry. Thus, it makes sense to use a phrase that will be readily understood by the users of the SQM Reports.

Also, deletion of the word "report" is inconsistent with the way the measurement functions. The only way a trouble can be included in the measurement is if the customer reports it. Also, this measure includes all trouble reports, including "Test OK" and

“Found OK.” Including these reports in the subject measure is inconsistent with deleting the word “report.” Consequently BellSouth does not believe there is any need to revise the definition and the meaning of this measurement.

**2. M&R-6: Average Answer Time – Repair Centers**

Documentation Improvements - Exclusions: KPMG recommends that the Exclusion documentation for this measurement be updated to list abandoned calls as an exclusion. BellSouth agrees with this KPMG recommendation, and will note that the number of abandoned calls is excluded from the calculation.

Recommended SQM Changes: KPMG recommends that the Commission consider “adding a diagnostic measurement to monitor repair center abandoned call duration and volume.” (Report, p. 52). BellSouth strongly disagrees. As discussed previously for measurement, O-12, with the technology in use today, BellSouth is unable to produce an average hold time for abandoned calls. A more thorough discussion of this point is included previously in reference to measurement 0-12.

**E. Billing (B)**

**1. B-3: Usage Data Delivery Accuracy**

Recommended SQM Changes: KPMG recommends that the performance standard for this measurement be changed from a retail analog to a benchmark of 100% because the Centralized Message Distribution System (“CMDS”), the current retail analog, is not similar to the Daily Usage File (“DUF”), which is used for the ALEC. BellSouth disagrees with the proposal to change to a benchmark. KPMG’s observation that CMDS is not equivalent to the ALEC DUF is accurate. However, the differences in CMDS and the DUF are not relevant to this measurement. This metric measures the

accuracy of delivering data packs containing usage data to the ALECs and to BellSouth's billing centers for retail usage. The method of transmitting the usage data is, in fact, the same for both ALEC and retail usage. In other words, the CMDS and DUF are analogous in the functions that are measured, and the differences between the two do not relate in any direct way to the measurement. Therefore, CMDS is an appropriate retail analog.

Even if a benchmark were appropriate (which it is not) a benchmark of 100% is not realistic, and is it not necessary. Perfection as a minimum standard is unreasonable. No system can be expected to perform perfectly. Also, when a data pack of usage is not received in an appropriate format, it is simply retransmitted. Thus, performance at less than 100% does not indicate that the data was not received, only that an additional transmission may have been required before receipt.

**2. B-4: Usage Data Delivery Completeness**

Recommended SQM Changes: KPMG recommends that the performance standard for this measurement be changed from a retail analog to a benchmark of 99%. In contrast to measurement B-3, the differences between DUF and CMDS are pertinent to this measurement (and to B-5 and B-6). Therefore, BellSouth agrees with KPMG that a benchmark is appropriate for this measure. However, BellSouth disagrees that the benchmark should be 99%. The Industry Standard for this measurement is 98% within 30 days (see CMDS User Guide BR190-402-215, July 2002). BellSouth proposes to change this measurement to the Industry Standard.

The only rationale provided by KPMG for the 99% benchmark was KPMG's experience during the Third Party Test, which (as BellSouth addressed previously) was not intended or designed to be the basis for setting performance standards. Also, during

the October 10, 2002 conference call, KPMG confirmed that the industry standard and commercial performance were not considered in arriving at the recommended benchmark of 99%.

**3. B-5: Usage Data Delivery Timeliness**

Recommended SQM Changes: As with measurement B-4, KPMG recommends that the performance standard for this measurement be changed from a retail analog to a benchmark. BellSouth agrees with KPMG that a benchmark is appropriate for this measure. However, BellSouth disagrees that the benchmark should be 95% within 5 business days, as recommended by KPMG. Telecordia has established an industry standard for usage data delivery timeliness of 95% within 6 calendar days. BellSouth proposes to change the standard for this measurement to the Industry Standard (see CMDS User Guide BR190-402-215, July 2002).

KPMG has offered no explanation as to how it arrived at a benchmark using 5 calendar days instead of 6. To meet a 5 business day benchmark, BellSouth would have to make significant changes in data collection and data delivery processes. As an example, in August BellSouth delivered over 619 million usage records to the ALECs in BellSouth's territory. In order to conform to a 5 business day standard, the records delivered in 6 days would have to be collected, processed and delivered within 5 days. Furthermore, this is a regional process. Thus, BellSouth would be forced to either process Florida usage records separately from the other eight states in BellSouth's region or change the objectives in all nine states to conform to the 5 business day standard in Florida.

Once again, KPMG offers no rationale to support the 5 day standard.

**4. B-6: Mean Time to Deliver Usage**

Recommended SQM Changes: Once again KPMG recommends that the performance standard for this measurement be changed from a retail analog to a benchmark and that the benchmark should be 95% within 5 business days. BellSouth agrees with KPMG that a benchmark is appropriate for this measure. However, BellSouth notes that this measurement is a mean – or average – measurement, which means that a benchmark of 95% is not appropriate. In other words, by definition, a mean measure is one in which the interval is met on average, not 95% of the time. On the October 10, 2002 conference call, KPMG agreed that this was a typographical error and would revise the recommendation. Also, BellSouth proposes that the standard should be an average interval of  $\leq 6$  days.

**5. B-7: Recurring Charge Completeness**

Documentation Improvements - Definition: KPMG recommends removing the word “fractional” from this measurement. BellSouth does not agree with this proposal and believes that the ALECs will disagree as well since the determination of fractional charges on the appropriate bill is the intent of this measurement. In fact, the ALECs proposed this measurement. KPMG states that the word “fractional” is inconsistent with “recurring.” KPMG’s stated rationale is that “fractional charge is a one time charge. [Therefore] the term, ‘fractional recurring charge’ is a misnomer.” (Report, p. 61). On the surface these words would appear to be contradictory. However, the word “recurring” simply refers to billing charges that occur each month. This distinguishes these charges from the one-time non-recurring charges such as installation fees. A fractional recurring charge is nothing more than a charge for part of a month. Thus the

phrase “fractional recurring” is not a misnomer as KPMG states, but is an accurate description of partial month billing.

Calculation: KPMG raises an issue concerning the calculation of “recurring charge completeness.” Currently, the calculation is  $(a \text{ divided by } b) \times 100$ , where a = count of fractional recurring charges that are on the correct bill and (b) = the total count of fractional recurring charges that are on the correct bill. The correct bill is defined as the next available bill. BellSouth agrees that this terminology is confusing and proposes the following modification to the SQM to remove the word “correct from Item (b) to clarify the calculation:

Item a = Count of fractional recurring charges that are on the correct bill  
(where correct bill is the next available bill)

Item b = Total count of fractional recurring charges that are on the bill.

This measurement captures the fractional charges that are on the bill, and of these, what percentage is on the ‘correct’ bill.

#### **6. B-8: Non-Recurring Charge Completeness**

KPMG raises the same issue regarding the calculation of “non-recurring charge completeness” that was discussed above in reference to B-7. BellSouth proposes the same charge as proposed above.

Specifically, BellSouth proposes the following language:

Item a = count of non-recurring charges that are on the correct bill (where correct bill is the next available bill)

Item b = Total count of non-recurring charges that are on the bill.

This measurement captures the non-recurring charges that are on the bill, and of these, what percentage is on the 'correct' bill.

**7. B-10: Percent Billing Errors Corrected in X Days**

Documentation Improvements - Calculation: KPMG appears to be concerned that the numerator and the denominator in the calculation for this measure do not use the same time range, and that there is a possibility that the measurement could produce results that exceed 100%. To address these issues, a review of the way the measurement functions is required.

The measurement title, "Percent Billing Errors Corrected in X Days" probably causes some confusion since "X" is actually 45 days, as defined in the calculation section of the SQM. In essence, the calculation of this measurement captures billing adjustments requested in a given month, and of these adjustment requests, how many were actually adjusted within 45 business days. Using an example, assume that the ALECs requested 100 billing adjustments during the month of August. That will be the denominator of the measurement. The numerator will include the portion of those 100 requested adjustments that were actually completed within 45 days of the request. The result will never be greater than 100% and normally is less than 100% since not all adjustments are completed within 45 days.

**F. Operator Services (OS) & Directory Assistance (DA)**

**1. OS-1: Speed to Answer Performance/Average Speed to Answer – Toll**

Documentation Improvements - Exclusions: KPMG recommends that abandoned calls should be added to Exclusions for this measurement. BellSouth disagrees. Mean

Abandon Rate is already factored into the Speed to Answer Conversion Tables that are used in the calculation of this measurement. These tables are based on Telcordia proprietary software, which is the national standard for this measurement (i.e., the software contains the industry-accepted method of performing these calculations). These Tables include a built in queuing algorithm that accounts for the abandon call time based on total calls answered, number of calls in queue and the number of available operators. More importantly, the Telcordia software used for this measurement has already been approved by both the FCC & the Florida Commission for determining the impact of having abandoned calls when these calls are not actually identified.

Moreover, as discussed previously, BellSouth's Operator Services platform does not have the capability to collect abandoned call duration separately from the calls that are answered by an operator. Since the standard for this measurement is Parity by Design, the impact will be the same for ALECs and for BellSouth retail.

Recommended SQM Changes: KPMG also recommends that the Commission consider adding a diagnostic measurement to monitor abandoned call duration and volume. BellSouth disagrees. As discussed above, the technical capability to collect abandon call duration currently does not exist in BellSouth. To provide this data for Toll and Directory Assistance, modifications would be required in all switches in the region at great expense to BellSouth.

2. **DA-1: Speed to Answer Performance/Average Speed to Answer –  
Directory Assistance (DA)**

Documentation Improvements - Exclusions: KPMG recommends that abandoned calls should be added to Exclusions for this measurement. BellSouth disagrees for the same reasons discussed under OS-1 above.

Recommended SQM Changes: KPMG also recommends that the Commission consider adding a diagnostic measurement to monitor abandoned call duration and volume. BellSouth disagrees for the reasons discussed under OS-1 above.

**G. E911**

**1. E-1: Timeliness**

Documentation Improvements: KPMG recommends that the name of this measurement be changed to “E911 – Database Update Timeliness.” BellSouth disagrees. Renaming a measurement in the SQM requires significant effort to implement the change, including revising reports on the performance measures portion of the BellSouth web site and revising existing reports in the BellSouth Monthly Performance Summary (MPS). The Monthly State Summary (MSS) filed with the Commission and with the FCC as part of BellSouth’s required 271 documentation would also have to be changed. In this case, the change has absolutely no impact on the data but is simply a name change for clarification purposes. Given this, any possible benefit does not justify the time, effort, or expense that would be required by BellSouth, or the possible confusion to ALECs that could result.

**2. E-2: Accuracy**

Documentation Improvements: KPMG recommends that the name of this measurement be changed to “E911 – Database Update Accuracy.” BellSouth disagrees for the same reasons discussed in E-1 above.

### **3. E-3: Mean Interval**

Documentation Improvements: KPMG recommends that the name of this measurement be changed to “E911 – Database Update Mean Interval.” BellSouth disagrees for on the same reasons addressed in E-1 above.

## **H. Trunk Group Performance (TGP)**

### **1. TGP-1: Trunk Group Performance - Aggregate**

SQM Issues - Exclusions: KPMG recommends that the exclusion, “blocked due to unanticipated significant increases in ALEC traffic” be quantified to avoid confusion. KPMG also proposes that the exclusion for “Final Groups actually overflowing, not blocked,” be clarified. BellSouth agrees with this recommendation and suggests the following respective clarifying language:

- 1) An “unanticipated significant increase” in traffic is indicated by a 20% increase for small trunk groups or 1800 CCS (CCS=100 Call Seconds) for large groups (72 trunks or more) over the previous months traffic when the increase was not forecast by the ALEC to allow for the provisioning of additional capacity.
- 2) When ALEC blocking is detected by the ALEC or BellSouth, the ALEC can request that BellSouth modify the translations for the affected final trunk groups to allow them to overflow to another ALEC group to allow calls to complete. For measurement purposes, the affected groups are still classified as “finals” and will indicate blocking even though the calls that exceed capacities are completing on another group and no blocking is actual occurring. This is done at no charge to the ALEC and can be initiated as easily as sending an e-mail. This procedure is often

used for temporary relief of ALEC blocking due to an unanticipated increase in ALEC traffic.

Performance Standard: KPMG recommends that the performance standard be changed from a “fail” to a “pass” benchmark to be more consistent with BellSouth’s other SQMs. BellSouth does not think this change is necessary for several reasons. The change from a fail to a pass would require additional programming and documentation changes that would yield nothing more than a simple inversion in the way the measurement result is stated. In the end, all of this unnecessary work would not provide any additional information to the Commission about BellSouth’s performance.

Secondly, the measurement of trunk blocking connotes a negative meaning because a call (or calls) did not complete. The purpose of measurement TGP-1 is to determine if the blocking for calls directed to ALEC customers exceeds the blocking level for calls directed to BellSouth’s retail customers. A failure indicator is consistent with the purpose of the measurement. Finally, KPMG’s premise that changing from fail to pass is consistent with BellSouth’s other SQMs is incorrect. BellSouth has several measurements such as Percent Missed Installation Appointments and Percent Missed Repair Appointments that could be considered as measurements of failure, and that are expressed in a way that is similar to measurement TGP-1.

KPMG also expressed concern that BellSouth’s use of consecutive 2-hour blocking periods ignores non-consecutive 2-hour blocking periods, in other words two single hours of blocking that might occur in a 24 hour period. BellSouth does not believe that KPMG’s concern is well-founded. Measurement TGP-1 includes a standard that results in a failure indication if, for any two consecutive hours, the blockage for the

ALECs exceeds the blockage for BellSouth retail by more than 0.5%, i.e., in practical terms, this means there is a difference in blocking of 1 call out of 200. The measurement's criteria of exceeding a 0.5% blocking threshold for two consecutive hours is so stringent that individual groups can, in fact, impact the overall results. The two-hour interval was chosen as a very challenging, strict measure that truly measures parity, but which is not so sensitive to normal traffic fluctuations that any measured differences would be meaningless. Traffic within a single hour is subject to significant normal variability and to short-interval, one-time network affecting events and calling patterns (mass calling events, for example), which are not related to parity, but which would nonetheless distort the TGP-1 measure.

**2. TGP-2: Trunk Group Performance – ALEC Specific**

SQM Issues - Exclusions: Performance Standard - BellSouth's comments for TGP-1 apply equally to TGP-2.

**I. Collocation**

**1. C-1: Collocation Average Response Time**

SQM Issues - Definition: KPMG proposes that the name be changed to "Collocation Average Application Response Time" to more accurately reflect the actual interval measured. Renaming a measurement in the SQM has significant implications. BellSouth would have to do coding changes in the Performance Measurement and Analysis Platform (PMAP), which is a major undertaking. Changes would also be required to the BellSouth web site, where performance measurement reports are posted, the BellSouth Monthly Performance Summary (MPS) and Monthly State Summary (MSS) reports filed with the Commission and with the FCC as part of BellSouth's 271-

required documentation. In this case, the change would provide little or no benefit, and any slight benefit is outweighed by the cost and labor required to make the change.

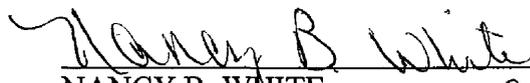
**Change Management (CM)**

1. **CM-1: Timeliness of Change Management Notices**
2. **CM-2: Change Management Notice Average Delay Days**
3. **CM-3: Timeliness of Documents Associated with Change**
4. **CM-4: Change Management Documentation Average Delay Days**
5. **CM-5: Notification of ALEC Interface Outages**

Documentation Improvements: KPMG recommends that the Report Structure be updated to reflect geographic scope (state or region). On the October 10, 2002 conference call, KPMG stated that it had no objection to regional reporting of these measurements. BellSouth will revise the SQM to indicate that these measurements are regional.

Respectfully submitted this 31st day of October 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE (KA)  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

  
\_\_\_\_\_  
R. DOUGLAS LACKEY (KA)  
J. PHILLIP CARVER  
675 W. Peachtree Street, Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0710

467872

# Composite Exhibit 1



Florida OSS Test  
Exception #154

Date: February 22, 2002

## EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

### Exception:

**KPMG Consulting cannot replicate the values in the "Provisioning: Coordinated Customer Conversions Interval" Service Quality Measurement (SQM) report for the Competitive Local Exchange Carrier (CLEC) Aggregate (August 2001). This exception was originally issued as Observation 142 (PMR5).**

### Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for CLECs engaged in business activity with BellSouth in the State of Florida.<sup>1</sup> BellSouth provides CLEC Aggregate processed data<sup>2</sup> (PMAP raw data<sup>3</sup>) as requested to KPMG Consulting.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Coordinated Customer Conversions Interval" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
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<sup>1</sup> These reports are posted on the PMAP Web site.

<sup>2</sup> The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

<sup>3</sup> The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the August 28, 2001 version 2.1.08 of the Manual.

1	Unbundled Loops with LNP	0-5 Min	4376	4859	90.06%	90.09%
2	Unbundled Loops with LNP	5-15 Min	463	4859	9.53%	9.49%
3	Unbundled Loops with LNP	Total CCC	N/A	N/A	4859	4845

KPMG Consulting reviewed BellSouth's Response to Observation 142<sup>4</sup> and re-tested using November 2001 data. However, KPMG Consulting could not replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Unbundled Loops with LNP	0-5 Min	6,727	7,769	86.59%	87.17%
2	Unbundled Loops with LNP	5-15 Min	1,032	7,769	13.28%	12.73%
3	Unbundled Loops with LNP	>15 Min	10	7,769	0.13%	0.10%

KPMG Consulting reviewed BellSouth's Response to Amended Observation 142<sup>5</sup> and re-tested using December 2001 data. Again, KPMG Consulting was unable to replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

<sup>4</sup> Florida OSS BellSouth's Response to Observation 142, 12/10/01.

<sup>5</sup> Florida OSS BellSouth's Response to Amended Observation 142, 1/29/02.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Unbundled Loops with LNP	0-5 Min	6844	7641	89.57%	89.52%
2	Unbundled Loops with LNP	5-15 Min	777	7641	10.17%	10.22%
3	Unbundled Loops with LNP	Total CCC	7,641	N/A	7,641	7,665

**Issue:**

KPMG Consulting reviewed BellSouth's Response to 2<sup>nd</sup> Amended Observation 142.<sup>6</sup> BellSouth stated that:

*Cust\_id 1686, ACNA ZXC was still being reported even though they are Test CLEC orders. Team Connection Defect 2792 was entered to exclude all Test CLEC orders from the December 2001 data; however, this particular cust\_id was inadvertently left out of the exclusions.*

Based on BellSouth's response, which states that a system fix must be implemented to resolve the discrepancies, KPMG Consulting escalates Observation 142 to Exception status.

**Impact:**

KPMG Consulting's inability to replicate the reported metrics values challenges the accuracy of BellSouth's calculations for the "Provisioning: Coordinated Customer Conversions Interval" SQM. Without accurate SQMs, CLECs may not be able to assess the quality of service received or plan for future business activities reliably.

**BellSouth's Response:**

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<sup>6</sup> Florida OSS BellSouth's Response to 2<sup>nd</sup> Amended Observation 142, 2/13/02.

BellSouth found that cust\_id 1686, ACNA ZXC was still being reported even though they are Test CLEC orders. Team Connection Defect 2792 was entered to exclude all Test CLEC orders from the "Provisioning: Coordinated Customer Conversions Interval" for December 2001 data; however, this particular cust\_id was inadvertently left out of the exclusions. Test Director Defect 600 was entered on February 12, 2002 to rectify this situation. This change is scheduled for the February 2002 production run for January 2002 data.



Florida OSS Test  
Amended Observation 142

January 29, 2002

### OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

#### Observation:

**KPMG Consulting cannot replicate the values in the "Provisioning: Coordinated Customer Conversions Interval" Service Quality Measurement (SQM) report for the Competitive Local Exchange Carrier (CLEC) Aggregate (August 2001). (PMR5)**

#### Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.<sup>1</sup> BellSouth provides CLEC Aggregate processed data<sup>2</sup> (PMAP raw data<sup>3</sup>) as requested to KPMG Consulting.

#### Issue:

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Coordinated Customer Conversions Interval" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Unbundled Loops with LNP	0-5 Min	4376	4859	90.06%	90.09%

<sup>1</sup> These reports are posted on the PMAP Web site.

<sup>2</sup> The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

<sup>3</sup> The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the August 28, 2001 version 2.1.08 of the Manual.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
2	Unbundled Loops with LNP	5-15 Min	463	4859	9.53%	9.49%
3	Unbundled Loops with LNP	Total CCC	N/A	N/A	4859	4845

**Amendment** – KPMG Consulting reviewed BellSouth’s Response to Observation 142<sup>4</sup> and re-tested using November 2001 data. However, KPMG Consulting continues to be unable to replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Unbundled Loops with LNP	0-5 Min	6,727	7,769	86.59%	87.17%
2	Unbundled Loops with LNP	5-15 Min	1,032	7,769	13.28%	12.73%
3	Unbundled Loops with LNP	>15 Min	10	7,769	0.13%	0.10%

**Impact:**

KPMG Consulting’s inability to replicate report values signifies that the accuracy of BellSouth’s calculations for the “Provisioning: Coordinated Customer Conversions Interval” SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

**BellSouth Response:**

BellSouth has entered an SQM Clearinghouse change to correct the buckets in the current FL Interim SQM. When it is complete, BellSouth will send this change to the FPSC and KPMG for review and approval.

The following reflects the changes that BellSouth will be proposing to the FPSC and KPMG.

<sup>4</sup> Florida OSS BellSouth’s Response to Observation 142, 12/10/01.

**Intervals:**

**0 to <=5**

**>5 to <=15**

**>15**

**Average Interval**

Utilizing these bucket designations, KPMG will be able to replicate the report and match BellSouth's reported values for November 2001.

## P-7: Coordinated Customer Conversions Interval

### Definition

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

### Exclusions

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

### Business Rules

When the service order includes INP, the interval includes the total time for the cut over including the translation time to place the line back in service on the ported line. When the service order includes LNP, the interval only includes the total time for the cut over (the port of the number is controlled by the CLEC). The interval is calculated for the entire cut over time for the service order and then divided by items worked in that time to give the average per-item interval for each service order.

### Calculation

**Coordinated Customer Conversions Interval** = (a - b)

- a = Completion Date and Time for Cross Connection of a Coordinated Unbundled Loop
- b = Disconnection Date and Time of an Coordinated Unbundled Loop

**Percent Coordinated Customer Conversions** (for each interval) = (c ÷ d) X 100

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

### Report Structure

- CLEC Specific
- CLEC Aggregate
- The interval breakout: is 0-5 = 0-4.99, 5-15 = 5-14.99, ≥15 = 15 and greater, plus Overall Average Interval:  
 0 to <= 5  
 >5 to <= 15  
 >15  
 Average Interval

### Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• CLEC Order Number</li> <li>• Committed Due Date (DD)</li> <li>• Service Type (CLASS_SVC_DESC)</li> <li>• Cut over Start Time</li> <li>• Cut over Completion Time</li> <li>• Portability Start and Completion Times (INP orders)</li> <li>• Total Conversions (Items)</li> </ul> <p><b>Note:</b> Code in parentheses is the corresponding header found in the raw data file.</p>	<ul style="list-style-type: none"> <li>• No BellSouth Analog Exists</li> </ul>



**SQM Disaggregation - Analog/Benchmark**

SQM LEVEL of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"><li>• Unbundled Loops with INP</li><li>• Unbundled Loops with LNP</li></ul>	<ul style="list-style-type: none"><li>• 95% ≤ 15 minutes</li></ul>

P-7: Coordinated Customer Conversions Interval