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October 1, 2001

Mrs. Blanca S. Bay6  
Director, Division of Records and Reporting  
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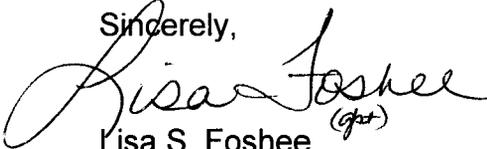
Re: **960786-A-TL (Section 271)**

Dear Ms. Bayó:

Enclosed please find **BellSouth Telecommunications, Inc.'s** Response to AT&T Communications of the Southern States, Inc.'s Request for Investigation into **BellSouth Telecommunications, Inc.'s** Conduct in Processing ALEC Orders and Retiring Key OSS Systems which we ask that you file in the above-referenced docket.

A copy 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 by E-Mail and Federal Express as shown on the attached Certificate of Service.

Sincerely,

  
Lisa S. Foshee

Enclosures

cc: All Parties of Record  
Marshall M. Criser III  
Fred J. McCallum  
Nancy B. White

**CERTIFICATE OF SERVICE  
DOCKET NO. 960786-A-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by E-Mail (#) and Federal Express this 1<sup>st</sup> day of October, 2001 to the following:

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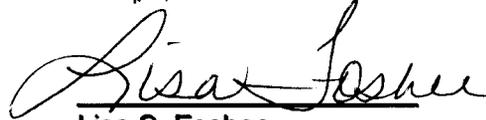
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**(+) Signed Protective Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Consideration of BellSouth	)	
Telecommunications, Inc.'s entry into	)	Docket No. 960786-A-TL
InterLATA service pursuant to Section 271	)	
Of the Federal Telecommunications Act	)	Filed: October 1, 2001
Of Act	)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO  
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S REQUEST FOR  
INVESTIGATION INTO BELLSOUTH TELECOMMUNICATIONS, INC.'S CONDUCT  
IN PROCESSING ALEC ORDERS AND RETIRING KEY OSS SYSTEMS**

**I. INTRODUCTION**

On September 18, 2001, AT&T Communications of the Southern States, Inc. and its affiliated companies (collectively "AT&T") filed a request requesting that the Commission investigate BellSouth's conduct in processing certain LSRs [Local Service Requests] and retiring key OSS systems. AT&T alleges that, in connection with discovery in other states, AT&T has uncovered documents which, according to AT&T, establish that certain of BellSouth's Local Carrier Service Centers ("LCSC") "engaged in the discriminatory practice of giving LSRs from certain states priority over LSRs from certain other BellSouth states throughout November 2000, and at least one LCSC maintained this practice for several months in 2001 until April of this year." Petition at 5. Furthermore, AT&T alleges that "BellSouth plans to replace many of its key OSS with new systems over the next eighteen months" but "has no intention of alerting ALECs to this OSS transition plan through the change control process or otherwise." Request, at 6.

The motivation for AT&T's petition and request for an investigation is clear -- to delay BellSouth's ability to obtain in-region, interLATA relief in Florida, thereby postponing the

benefits to Florida consumers of additional competition in the local and long distance markets. No such delay is necessary or warranted. AT&T's allegations of discriminatory preference being given to certain states' LSRs during the third-party test and "secret" OSS documents are seriously overstated. Furthermore, even if true, such allegations do not serve as a basis for an investigation or deferring the Commission's consideration of BellSouth's compliance with the requirements of Section 27 1. Accordingly, AT&T's request that the Commission conduct an investigation should be denied.

## **II. DISCUSSION**

### **A. Background**

In assessing AT&T's allegations that BellSouth had an "improper practice" of providing discriminatory preferential treatment to LSRs for certain states, it is imperative to put these allegations into proper context. BellSouth's LCSCs are work centers that are involved in handling LSRs that are submitted to BellSouth manually or electronically submitted LSRs that fall out for manual handling. By mid-2000, both this Commission and the Georgia Public Service Commission had adopted performance standards to be used in connection with the third-party tests in those states. The standards adopted by the Georgia and Florida Commissions included stringent targets for the timeliness by which the LCSC returned Firm Order Confirmations ("FOCs") and Reject Notices.

In order to meet the standards established by the Georgia and Florida Commissions, BellSouth took steps to increase the workforce in the LCSC. Throughout the late summer and into the fall of 2000 BellSouth was training and deploying new service representatives in the LCSCs. In addition, in order to meet the benchmarks in Georgia and Florida, for a short period of time, priority was given to all LSRs submitted manually from these two states in at least one

of BellSouth's LCSCs. This treatment for manual LSRs from Florida and Georgia was started in the August-September, 2000 timeframe and was to have ended in the December 2000 timeframe.

From April through July of 2001, Price Waterhouse Coopers ("PWC") was engaged by BellSouth to conduct an investigation and prepare a report as to whether BellSouth's operational support systems used to provide pre-ordering and ordering functions to ALECs are regional in nature. This process was designed based on the same type of audit conducted by Ernst and Young on behalf of Southwestern Bell Telephone Company and favorably cited by the FCC in its order approving Southwestern Bell's application for long distance relief in Kansas and Oklahoma. The PWC report would be used to support future applications for Section 271 relief in other BellSouth states.

During its examination, PWC conducted numerous interviews with personnel in the LCSCs in Atlanta, Birmingham and Jacksonville. As a result of these interviews, PWC prepared notes of the substance of the interviews as a part of its backup material. These notes were produced to AT&T and others pursuant to discovery requests in connection with BellSouth 271 proceeding in North Carolina. Also in connection with discovery requests in North Carolina, BellSouth produced a proprietary planning document relating to its operational support systems. **This document, the substance of which is proprietary, is a planning tool used to judge which systems will need to be replaced and includes a rough estimate of the year in which the replacement is planned to occur.** Both the PWC notes and the BellSouth planning document serve as the basis for AT&T's petition.

**B. Preferential Treatment Of Georgia and Florida LSRs**

No Commission investigation is necessary to confirm that at least one of BellSouth's LCSCs gave priority to manual LSRs in order to comply with the standards established by the

Georgia and Florida commissions, until such time as additional service representatives could be hired and trained to handle the increased work while meeting these expedited regulatory standards. If BellSouth received two LSRs, one from a state like Georgia where there is a Commission benchmark to return a FOC on a manually submitted LSR within 36 hours, and the other from a state with no similar mandate, there was nothing nefarious about BellSouth giving priority to the LSR from Georgia. In any event, once the additional service representatives were hired and trained, these measures in the LCSCs became unnecessary and were discontinued.’

However, whatever preference was given to LSRs from Florida during the third-party test, any such preferential treatment does not “cast significant doubt regarding whether BellSouth is meeting its obligations to provide ALECs with non-discriminatory access to its OSS . . .,” as alleged by AT&T. The issue before this Commission in this docket is whether BellSouth has complied with its statutory obligations in Florida. That BellSouth may have treated LSRs from Florida differently than LSRs from other states has no bearing on this issue.

Furthermore, even if this Commission were concerned about BellSouth’s performance results in states other than Florida, BellSouth’s performance in all nine states has consistently and significantly improved at relatively the same levels. If AT&T’s allegations of sustained preferential treatment by BellSouth were true, one would expect that performance results in Georgia and Florida would be consistently and significantly better for Reject Timeliness and FOC Timeliness, which are the two measurements that would be primarily impacted by priority treatment for manual LSRs. In fact, the performance data shows otherwise.

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<sup>1</sup> Although the practice of giving preference to LSRs from Georgia and Florida was supposed to be discontinued in December 2000, PWC observed that one of BellSouth’s LCSCs inadvertently continued the practice until April of 2001, when it was discontinued. See Exhibit C to AT&T’s Petition.

Attached as Exhibit 1 are performance data for the period July 2000 through July 2001, with respect to the following disaggregated categories with significant volumes: resale residence and business non-mechanized orders; UNE analog loops non-mechanized orders; and UNE-P combinations non-mechanized orders. The data for these products shows that, beginning in the January through March 2001 time period, BellSouth's performance has been consistent across all nine states, with all states exceeding the relevant benchmark on both the FOC and Reject timeliness measures for nearly every month. In short, the actual performance in all of BellSouth's states through July 2001 clearly demonstrates that any priority given to Georgia and Florida manual LSRs was very short-lived and caused very little disparity in the actual performance between or among states.

AT&T's claim that any preferential treatment of Florida LSRs during the KPMG third-party test has "tainted" the performance data that BellSouth reports each month also is absurd. Even if the so-called preferential treatment did cause disparity in performance data (which it did not), the disparity would have stopped at the latest in April 2001. This is before any of the performance data upon which BellSouth's proposes to rely to demonstrate its compliance with Section 271. Furthermore, AT&T conveniently ignores that KPMG will review BellSouth's performance reports under the Commission's direction.<sup>2</sup>

In short, the treatment that BellSouth gave to LSRs from Georgia and Florida has no bearing on the validity of the Florida third-party test or BellSouth's performance data or on this Commission's ability to determine whether BellSouth's has complied fully with its obligations

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<sup>2</sup> Although not specifically alleged in its Petition, AT&T appears to suggest that BellSouth gave preference to KPMG orders during the third-party test. See Petition at 2. Although BellSouth is looking into such allegations, any such preferential treatment would not detract from the underlying value of the test itself nor would it have any affect on BellSouth's performance data by which the Commission can evaluate the operational readiness of BellSouth's OSS and the extent to which BellSouth is providing nondiscriminatory access to its OSS.

under Section 271, including the obligation to provide nondiscriminatory access to its OSS. No additional hearing or investigation is warranted at this time.

C. **“Secret” OSS Planning Document**

AT&T also alleges that this Commission should, for some reason, investigate BellSouth’s planned systems retirements and replacements. There is hardly anything unusual or startling about the fact that BellSouth as a routine part of its business operations periodically assesses the need for upgrading and replacement of its systems. Every company does this and should do so. If ongoing business planning were a valid reason to delay consideration of BellSouth’s 271 application, then this Commission could never vote.

Although AT&T suggests that BellSouth has a “secret” plan to replace key OSS in the near future, AT&T fails to mention that BellSouth first disclosed this “secret” plan in public testimony filed by BellSouth in Alabama. In June 2001, BellSouth submitted the pre-filed testimony of Mr. Ken Ainsworth, who mentioned the fact that the DOE and SONGS applications were on a sunset list and would be retired sometime in the future. Thus, while AT&T does not mention this, AT&T has known of the existence of this sunset list for several months. It has hardly been kept a “secret.”

BellSouth periodically evaluates its support systems in order to determine which systems need to be enhanced and which systems need to be phased out and replaced over time as the needs of BellSouth's business change. AT&T surely goes through the same type of process and is familiar with the concepts employed. In this case, BellSouth produced to AT&T the guidelines that are used by BellSouth to make this evaluation, as well as the planning matrix that lists the impacted systems and the planning dates for retirement. As was repeatedly made clear at the South Carolina hearing, the transcript from which is attached to AT&T’s petition, this

sunset list is a planning tool and not a “concrete” schedule as to when the systems are going to be replaced. In fact, of the systems discussed by counsel for AT&T at the South Carolina hearing that were “planned” to be retired in 2001, none of them has actually been retired because the replacement systems are still being evaluated at this time. Thus, none of the changes about which AT&T is so concerned have actually occurred.

With regard to notification to ALECs, the Change Control Process (“CCP”) clearly provides that BellSouth is required to notify ALECs of “ALEC Affecting Changes” related to the following interfaces – LENS, EDI, TAG, TAFI, ECTA, and CSOTS. An “ALEC Affecting Change” is defined as any change that requires the ALEC to modify the way they operate or to rewrite system code. AT&T makes much of the fact that BellSouth would not, in the normal course of events, provide notice to ALECs of changes to the systems discussed at the South Carolina hearing under the CCP; however, the simple explanation is that *none* of the systems discussed at the hearing is included in the interfaces that are subject to change control. Moreover, if they were a part of the CCP, if the changes are seamless to the ALECs, there would be no need to notify them of changes since these would not affect them.

### **III. CONCLUSION**

**For** the foregoing reasons, **AT&T’s** request that the Commission investigate these allegations in the context of the Section 271 process, and thereby delay the process, should be denied.

Respectfully submitted, this 1st day of October, 2001.

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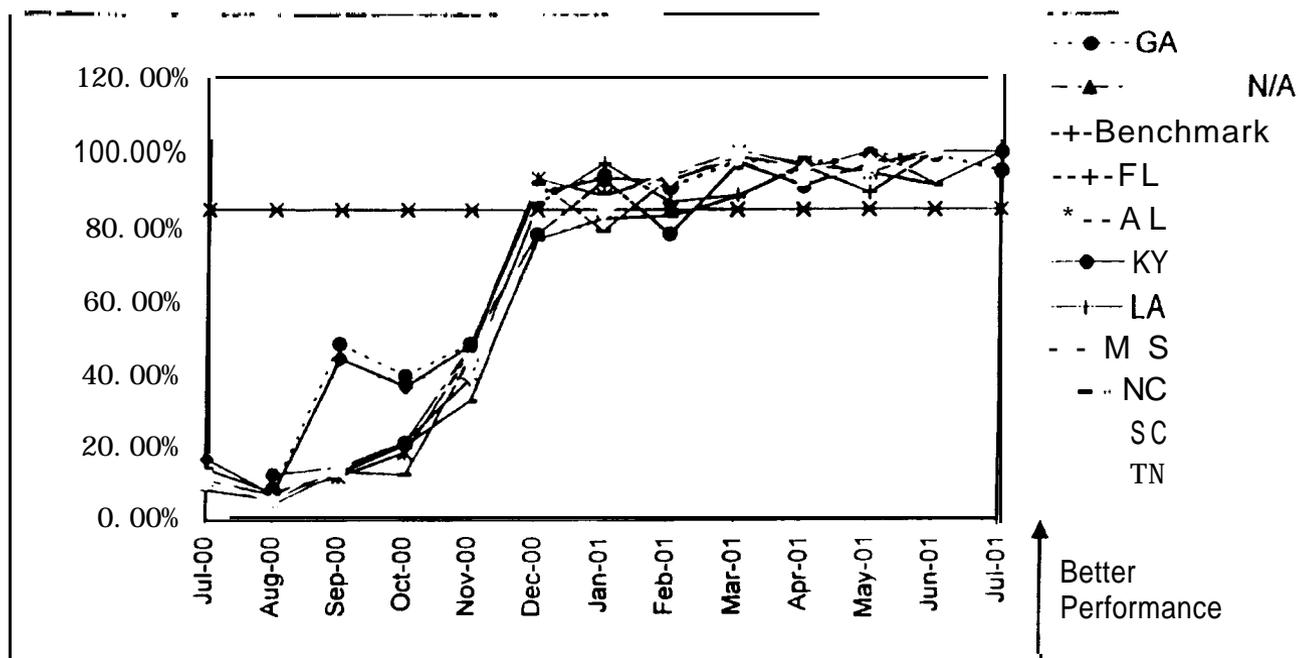
413598

# **EXHIBIT 1**

## Resale -Ordering Reject Interval - Non-Mechanized Residence (%)

(% of CLEC Reject Notification Intervals within 24 Hours)

Numerator indicates total number of CLEC reject notification intervals within 24 hours for this disaggregation in the reporting period  
Volume indicates total number of service requests for this disaggregation rejected in the reporting period



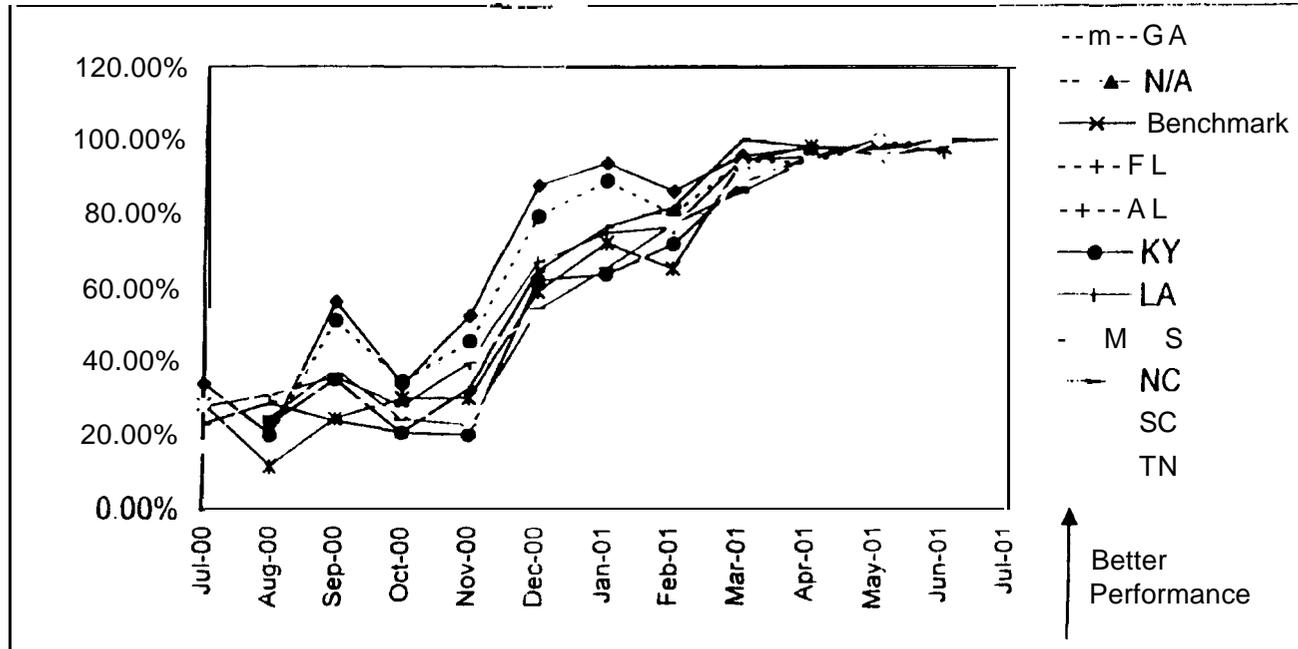
	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01
GA		871%	49 14%	40.51%	49 16%	89 66%	93.88%	90.61%	97 83%	9694%	99 23%	99 07%	94 94%
AL	11.41%	7.14%	12 27%	19 05%	47 06%	93 16%	88 64%	94 55%	100 00%	97 06%	94 59%	10000%	
FL	17.30%	7.43%	45.17%	37 63%	48 61%	69 51%	93.22%	92 70%	98 71%	96 40%	97 20%	99.02%	
KY		12.94%	14 93%	22 03%	48 40%	78 55%	92 86%	70 57%	97 22%	91 18%	96 77%	10000%	100 00%
LA	84 1%	58 6%	13 54%	22 14%	39 66%	86 67%	97.10%	87 01%	88 69%	96 15%	89 47%	100 00%	
MS	14 47%	7 73%	13 12%	21 19%	33 49%	77 19%	62 76%	83 33%	88 46%	96 88%	94 44%	91 30%	
NC		4 41%	13 54%	12 79%	45 49%	92 21%	79 41%	93 75%	10000%	95 65%	10000%	91 67%	100 00%
SC	10 46%	5 71%	16 90%	30 49%	40 85%	62 65%	84.09%	93 02%	10000%	95 65%	97 56%	93.94%	
TN	12.39%	4.96%	13 97%	28.89%	40 85%	89 26%	86 84%	95 00%	97 83%	92 86%	95.00%	10000%	
Benchmark	85 00%	85.00%	85.00%	85 00%	85 00%	85 00%	85.00%	85 00%	85 00%	85 00%	85.00%	85 00%	85 00%

## Resale - Ordering Reject Interval - Non-Mechanized Business (%)

(% of CLEC Reject Notification intervals within 24 Hours)

Numerator indicates total number of CLEC reject notification intervals within 24 hours for this disaggregation in the reporting period

Volume indicates total number of service requests for this disaggregation rejected in the reporting period



	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01
GA		20.83%	51.56%	35.18%	45.91%	79.43%	88.89%	79.76%	94.31%	93.71%	99.03%	99.25%	100.00%
AL	29.07%	12.50%	25.21%	30.77%	30.85%	59.52%	72.31%	65.57%	94.12%	98.25%	95.83%	97.67%	
FL	34.60%	20.93%	56.76%	34.37%	52.94%	87.80%	93.66%	86.09%	95.66%	97.66%	97.26%	99.64%	
KY		23.88%	35.78%	21.36%	20.83%	62.50%	63.89%	72.00%	88.46%	95.24%	100.00%	100.00%	100.00%
LA	28.48%	31.61%	36.44%	28.66%	40.22%	67.30%	75.00%	76.47%	94.68%	95.28%	98.55%	96.49%	
MS	23.81%	29.47%	24.56%	21.52%	33.33%	65.08%	76.56%	81.82%	100.00%	98.04%	97.67%	100.00%	
NC		25.54%	38.62%	25.15%	23.53%	54.46%	65.45%	77.33%	85.90%	94.74%	98.70%	98.92%	100.00%
SC	29.03%	33.33%	31.96%	27.00%	24.35%	45.16%	42.42%	59.09%	93.18%	91.67%	100.00%	100.00%	
TN	17.58%	35.90%	39.51%	42.99%	42.19%	52.69%	57.66%	77.38%	89.33%	93.75%	95.16%	100.00%	
Benchmark	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%

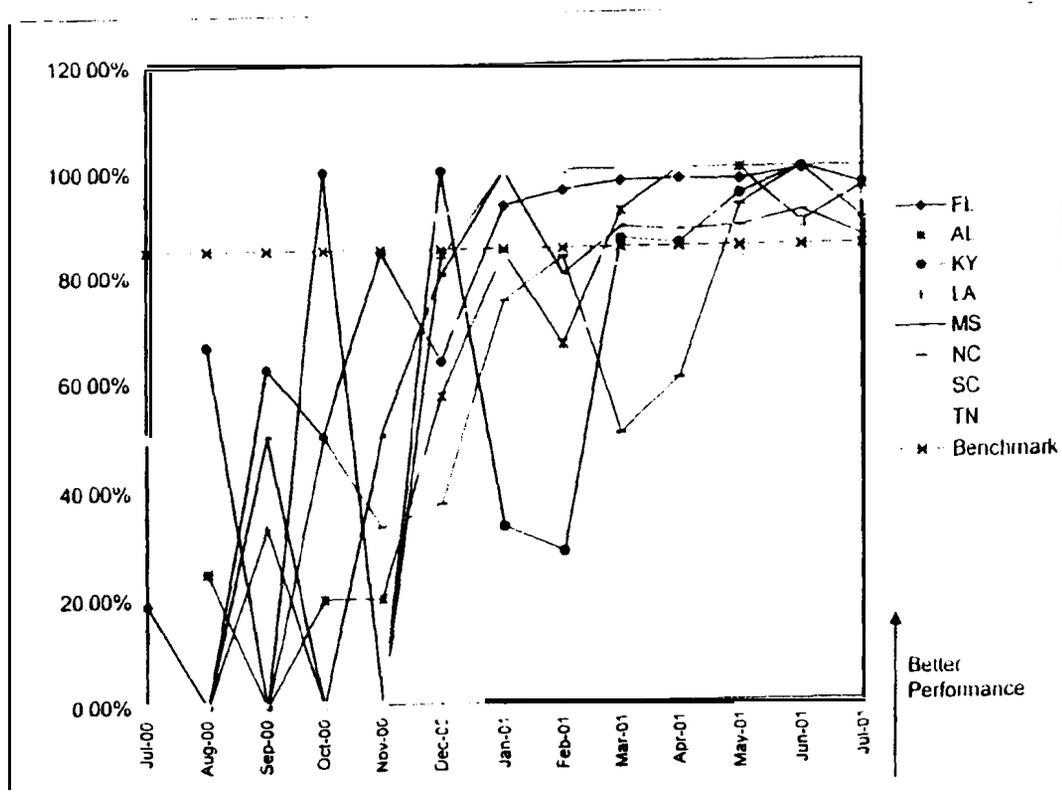
### Unbundled Network Elements - Ordering

### Reject Interval - Non-Mechanized

### Loop + Port Combinations (%)

(% of CI EC Reject Notification Intervals within 24 Hours)

Numerator indicates total number of CI EC reject notification intervals within 24 hours for this disaggregation in the reporting period.  
 Volume indicates total number of service requests for this disaggregation rejected in the reporting period.

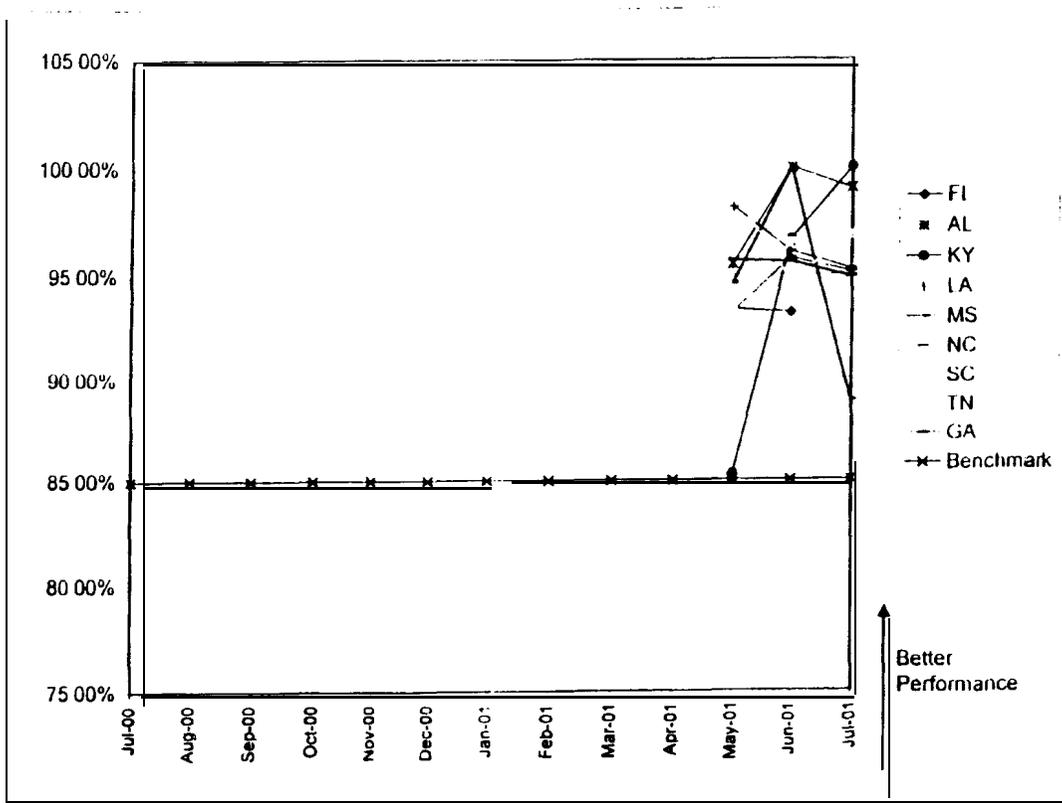


	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01
GA		27.78%	36.84%	50.00%	54.55%	66.36%	63.42%	67.00%	66.25%	100.00%	100.00%	99.02%	94.55%
AL		25.00%	0.00%	20.00%	20.00%	57.14%	84.21%	66.67%	92.00%	100.00%	100.00%	89.47%	96.30%
FL	19.05%	0.00%	62.50%	50.00%	84.62%	63.64%	93.33%	96.15%	97.73%	98.00%	97.76%	99.60%	96.67%
KY		66.67%		100.00%	0.00%	100.00%	33.33%	26.57%	66.67%	85.71%	95.00%	100.00%	96.67%
LA		0.00%	33.33%			83.33%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
MS			50.00%		50.00%	80.00%	100.00%	80.00%	88.89%	88.24%	88.89%	91.67%	86.67%
NC		25.00%	0.00%	50.00%	33.33%	37.50%	75.00%	83.33%	50.00%	60.00%	92.86%	100.00%	80.00%
SC		0.00%	0.00%	0.00%	0.00%	66.67%	83.33%	50.00%	100.00%	100.00%	87.50%	95.00%	94.12%
TN	50.00%	0.00%	0.00%		0.00%	90.91%	100.00%	100.00%	80.00%	100.00%	83.33%	88.89%	85.00%
Benchmark	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%

**Unbundled Net Elements - Ordering  
Reject Interconnection-Mechanized  
2W Analog Loop Non-Design %**

(% of CLEC Reject Notification Intervals within 24 Hours)

Numerator indicates total number of CLEC reject notification intervals within 24 hours for this disaggregation in the reporting period  
Volume indicates total number of service requests for this disaggregation rejected in the reporting period

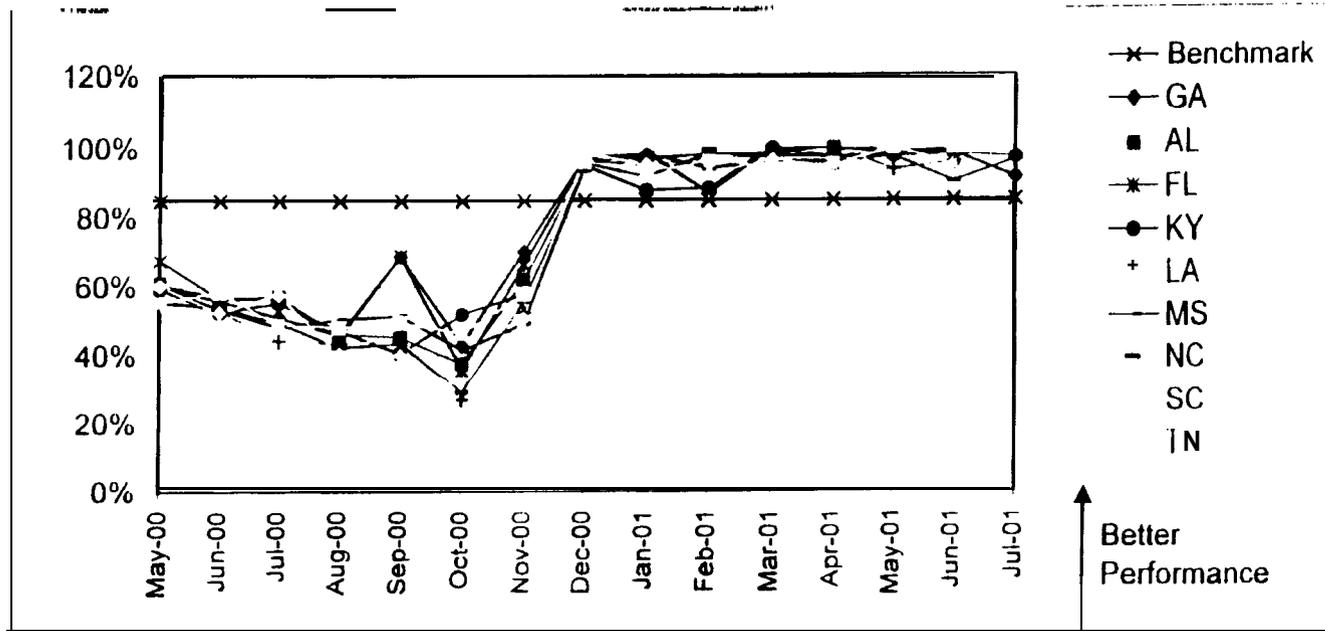


	Jul 00	Aug 00	Sep 00	Oct 00	Nov 00	Dec 00	Jan 01	Feb 01	Mar 01	Apr 01	May 01	Jun 01	Jul 01
GA											95.69%	95.60%	94.90%
AL											95.50%	100.00%	99.02%
FL											93.38%	93.21%	
KY											85.29%	96.67%	100.00%
LA											98.16%	98.10%	95.28%
MS											94.59%	100.00%	88.80%
NC											93.25%	95.70%	95.13%
SC											98.75%	94.74%	96.85%
TN											93.33%	96.47%	
Benchmark	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%

## Retail - Ordering [ OC Timeliness - Non-Mechanized Residence (%)

(% of CLEC Firm Order Confirmation Intervals within 36 Hours)

Numerator indicates the total number of CLEC firm order confirmation intervals within 36 hours for this disaggregation in the reporting period  
Volume indicates total number of service requests confirmed for this disaggregation in the reporting period



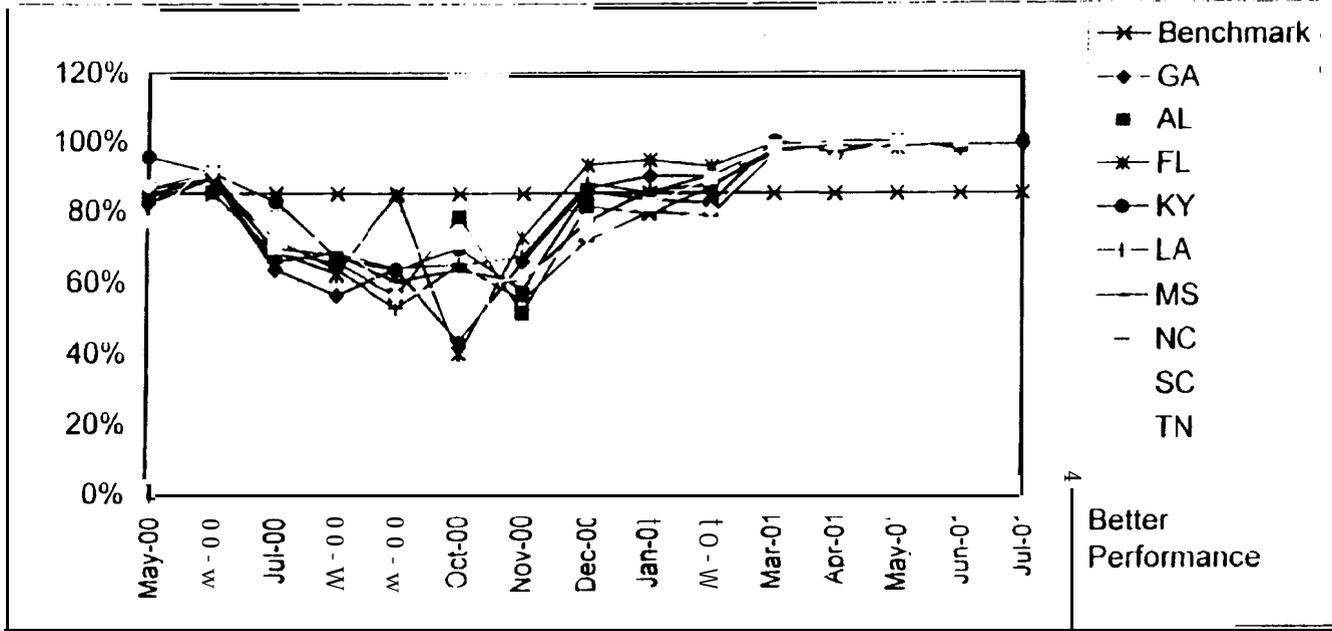
	May-00	Jun-00	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01
GA	59.88%	55.90%	51.11%	45.98%	68.96%	42.97%	70.36%	97.47%	98.39%	94.24%	96.03%	95.83%	97.45%	98.41%	91.30%
AL	60.80%	56.94%	57.20%	46.26%	45.44%	37.42%	61.76%	95.03%	96.59%	98.45%	98.91%	100.00%	99.13%	100.00%	
FL	67.64%	56.50%	56.38%	45.09%	69.09%	35.69%	66.46%	96.68%	97.29%	98.05%	98.73%	96.88%	98.41%	99.09%	
KY	59.35%	52.57%	55.31%	47.26%	40.48%	52.05%	57.80%	95.04%	87.88%	88.42%	100.00%	97.30%	97.47%	98.15%	97.18%
LA	56.72%	53.01%	44.28%	43.54%	44.67%	26.98%	52.53%	95.42%	95.05%	96.82%	97.26%	100.00%	93.65%	95.83%	
MS	59.79%	53.58%	48.24%	50.49%	51.61%	41.43%	49.16%	95.27%	98.72%	87.10%	100.00%	100.00%	98.11%	100.00%	
NC	55.35%	53.97%	49.57%	42.34%	43.46%	29.24%	55.68%	75.67%	91.76%	98.48%	99.77%	97.56%	97.30%	90.24%	96.43%
SC	60.18%	57.56%	57.68%	40.48%	40.17%	77.56%	50.68%	98.48%	95.24%	92.54%	96.51%	94.52%	100.00%	95.00%	
TN	35.29%	58.51%	48.99%	48.08%	49.57%	46.57%	57.79%	98.05%	93.16%	96.08%	94.59%	95.00%	100.00%	100.00%	
Benchmark	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%

## Re - Ordering FOC Timeliness - Non-Mechanized Business (%)

(% of CLEC Firm Order Confirmation Intervals within 35 Hours)

Numerator indicates total number of CLEC firm order confirmation intervals within 36 hours for this disaggregation in the reporting period

Volume indicates total number of service requests confirmed for this disaggregation in the reporting period



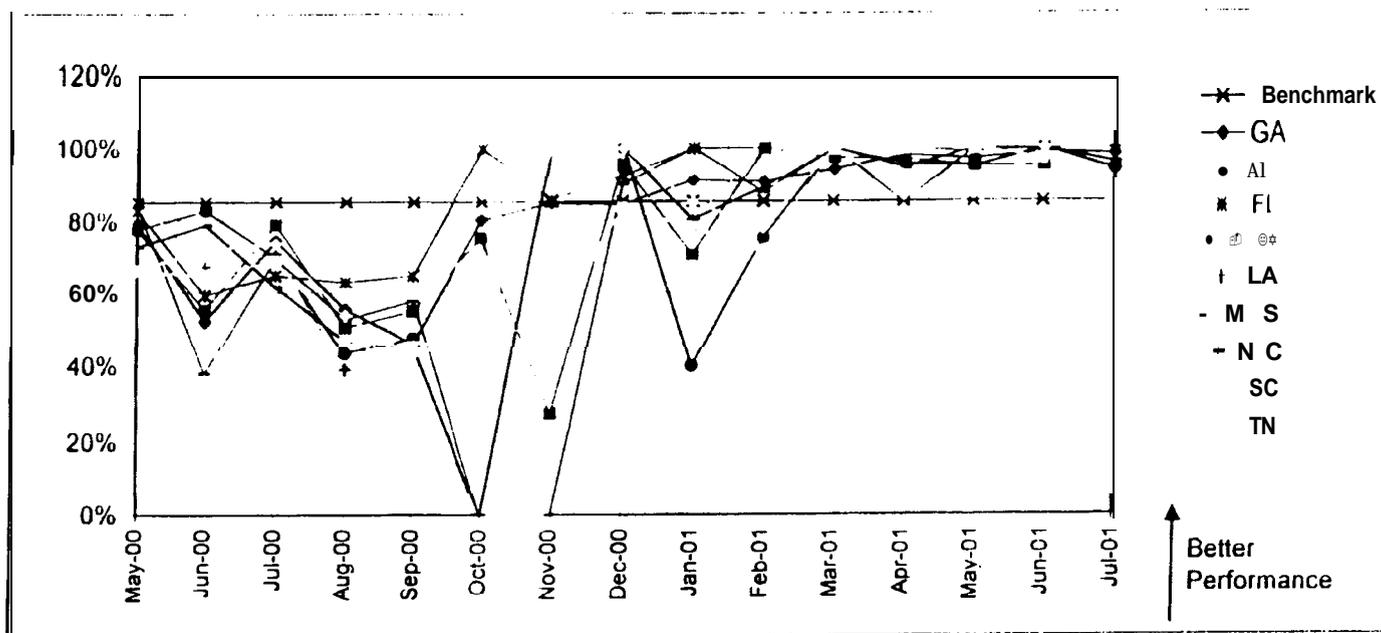
	May-00	Jun-00	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01
GA	82.33%	89.47%	63.41%	56.20%	63.54%	43.41%	65.66%	86.40%	89.86%	89.90%	96.99%	98.71%	98.78%	98.80%	98.89%
AL	84.56%	85.35%	67.80%	65.42%	56.14%	78.26%	51.11%	81.29%	78.95%	86.59%	98.41%	98.80%	100.00%	98.18%	
FL	86.43%	91.38%	68.25%	62.33%	84.53%	39.74%	72.37%	93.14%	94.52%	92.81%	99.43%	98.56%	97.94%	99.49%	
KY	95.60%	90.94%	82.63%	66.67%	63.24%	69.23%	57.50%	85.59%	83.10%	82.22%	100.00%	96.55%	100.00%	100.00%	100.00%
LA	86.25%	89.43%	71.61%	63.57%	52.63%	64.59%	67.05%	87.75%	85.25%	90.12%	97.74%	98.84%	100.00%	97.40%	
MS	84.84%	89.18%	69.23%	67.51%	60.14%	63.25%	59.83%	76.86%	85.71%	87.36%	96.55%	100.00%	100.00%	98.18%	
NC	84.32%	89.36%	65.55%	68.08%	63.86%	64.79%	54.79%	71.35%	79.52%	78.63%	96.49%	99.23%	99.07%	100.00%	100.00%
SC	87.31%	91.53%	72.71%	71.57%	56.22%	59.26%	61.02%	73.13%	76.00%	80.00%	96.67%	95.00%	100.00%	100.00%	
TN	76.80%	95.37%	69.91%	73.74%	67.43%	71.19%	34.39%	76.74%	81.76%	89.31%	98.00%	99.25%	99.09%	100.00%	
Benchmark	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%

## UNE - Ordering FOC Timeliness - Non-Mechanized Loop + Port Combinations (%)

(% of CLEC Firm Order Confirmation Intervals within 36 Hours)

Numerator indicates total number of CLEC firm order confirmation intervals within 36 hours for this disaggregation in the reporting period

Volume indicates total number of service requests confirmed for this disaggregation in the reporting period

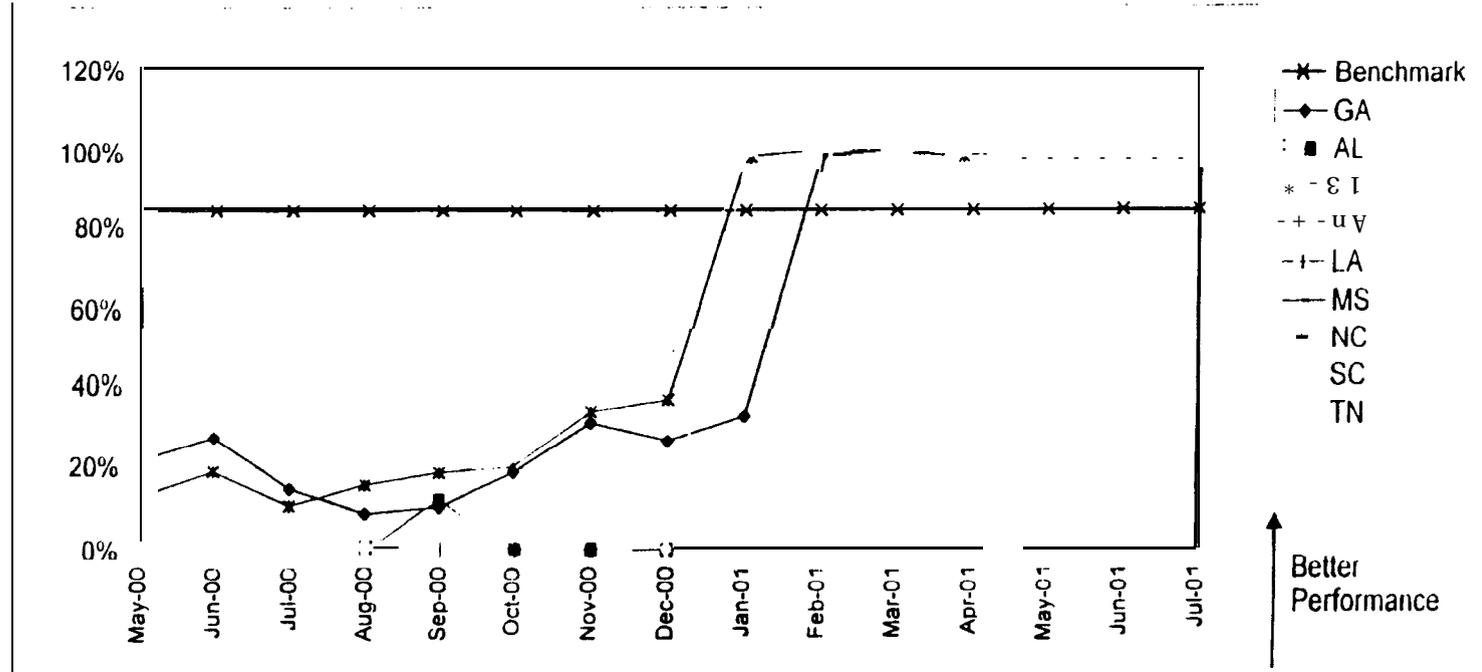


	May-00	Jun-00	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01
GA	78.80%	52.39%	74.15%	55.50%	46.42%	80.00%	84.62%	84.21%	90.91%	90.58%	93.94%	98.11%	97.00%	98.99%	98.36%
AL	77.38%	55.30%	78.71%	50.76%	55.18%	75.00%	27.78%	95.65%	70.37%	100.00%	97.18%	96.97%	95.00%	95.00%	99.21%
FL	82.48%	59.32%	64.75%	62.93%	64.70%	100.00%	85.71%	92.31%	100.00%	100.00%	100.00%	100.00%	98.92%	99.93%	
KY	77.42%	82.61%	69.59%	43.38%	47.83%			100.00%	40.00%	75.00%	100.00%	95.65%	94.87%	100.00%	94.12%
LA	85.71%	67.13%	70.72%	39.14%	56.43%				80.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
MS	72.50%	78.57%	61.52%	46.95%	45.41%	0.00%	100.00%	100.00%	80.00%	88.89%	100.00%	94.44%	100.00%	100.00%	96.00%
NC	83.49%	38.13%	69.27%	52.86%	57.72%	0.00%	0.00%	90.00%	100.00%	87.50%	100.00%	84.62%	100.00%	100.00%	100.00%
SC	66.36%	71.79%	73.60%	54.01%	42.97%	50.00%	100.00%	100.00%	84.62%	77.78%	100.00%	86.67%	86.96%	100.00%	94.44%
IN	65.98%	64.75%	68.80%	47.02%	45.68%	50.00%	50.00%	83.33%	77.78%	71.43%	100.00%	100.00%	100.00%	97.14%	
Benchmark	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%

## UNE - Ordering FOC Timeliness - Non-Mechanized 2W Analog Loop Non-Design (%)

(% of ULEC Firm Order Confirmation Intervals within 36 Hours)

Numerator indicates total number of ULEC firm order confirmation intervals within 36 hours for this disaggregation period  
Volume indicates total number of service requests confirmed for this disaggregation in the reporting period



End of Document

	May-00	Jun-00	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	Jan-01	Feb-01	Mar-01	Apr-01	May-01	Jun-01	Jul-01
GA	22 00%	27 57%	15 08%	9 15%	10 68%	19 12%	31 25%	26 76%	32 82%	99 06%	100 00%	100 00%	99 71%	99 87%	99 70%
AL				0 00%	12 50%	0 00%	0 00%	0 00%	100 00%	100 00%	100 00%	100 00%	100 00%	98 91%	100 00%
FL	13 16%	19 28%	10 96%	16 13%	19 05%	20 41%	34 04%	36 84%	98 68%	100 00%	100 00%	98 94%	99 26%	99 42%	
KY													100 00%	100 00%	100 00%
LA				0 00%	0 00%	0 00%	0 00%	0 00%	100 00%	100 00%	100 00%		100 00%	100 00%	100 00%
MS						0 00%							100 00%	100 00%	96 67%
NC		0 00%								100 00%	100 00%	100 00%	99 67%	99 18%	99 46%
SC	0 00%	0 00%	0 00%	0 00%				0 00%	100 00%				100 00%	99 25%	100 00%
TN								50 00%	100 00%	100 00%	100 00%	100 00%	100 00%	99 60%	
Benchmark	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%	85 00%