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January 23, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: CC Docket No. 97-208, CC Docket No. 97-231, CC Docket No. 97-124, CC Docket No. 97-137, and CC Docket No. 96-98

Dear Ms. Salas:

Today Sid Boren, Randy New, Allan Price, William Stacy, Jim Llewellyn, Bob Blau and the undersigned met with Carol Mattey,Jonathan Askin, Bill Bailey, Susan Launer, Gregory Cooke, Kent Nilsson, Michael Riordan, David Kirschner, Audrey Wright, Wendy Lader, Radhika Karmarkar, Jordan Goldstein, Michelle Carey, Michael Pryor, Brent Olson, and Jake E. Jennings.

During the meeting the participants discussed issues related to implementation of the provisions of Sections 251 and 271 of the Communications Act relating to:Poles, conduits and rights-of-way; White pages; Interconnection; Collocation; and Loops. In particular they discussed the questions and answers appearing in earlier written ex parte presentations made by BellSouth on January 13, 1998 and January 21, 1998, copies of which have also been filed with your office. I am also enclosing as an attachment a copy of the document setting forth BellSouth's Proposed Implementation of Georgia Docket No. 7892_U because the staff had requested a copy of this document.

To comply with Section 1.1206(a)(2) of the Commission's rules, I am filing with the FCC for each proceeding identified above two copies of this notice. Please associate this notification with each of those proceedings.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz
Vice President - Federal Regulatory Affairs

cc: Carol Mattey
Jonathan Askin
Bill Bailey
Susan Launer
Gregory Cooke
Kent Nilsson
Mike Riordan
David Kirschner
Audrey Wright
Wendy Lader
Radhika Karmarkar
Jordan Goldstein
Michelle Carey
Michael Pryor
Brent Olson
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BellSouth's Proposed Implementation of Georgia Docket No. 7892_U

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PRE-ORDERING (PO)

Function:	**Average Response Interval for Pre-Ordering Information & OSS Interface Availability**
Measurement Overview:	As an initial step of establishing service, the customer service agent must establish such basic facts as availability of desired features, likely service delivery intervals, the telephone number to be assigned, the current products and features the customer has, and the validity of the street address. Typically, this type of information is gathered from supporting OSSs while the customer (or potential customer) is on the telephone with the customer service agent. Pre-ordering activities are the first contact that a customer may have with a CLEC. This measure is designed to monitor the time required for CLECs to obtain the pre-ordering information necessary to establish and modify service. Comparison to BST results allow conclusions as to whether an equal opportunity exists for the CLEC to deliver a comparable customer experience (compared to BST) when a retail customer calls the CLEC with a service inquiry.
Measurement Methodology:	**1. Average Response Interval = $\sum$ [(Query Response Date & Time) - (Query Submission Date & Time)] / (Number of Queries Submitted in Reporting Period)** The response interval for each pre-ordering query is determined by computing the elapsed time from BST receipt of a query from the CLEC, whether or not syntactically correct, to the time BST returns the requested data to the CLEC. Elapsed time is accumulated for each major query type, consistent with the specified reporting dimension, and then divided by the associated total number of queries received by BST during the reporting period. **Objective:** Average response time per transaction for a query for appointment scheduling, service & feature availability, address verification, request for Telephone Numbers (TNs), and Customer Service Records (CSRs). The query interval starts with the request message leaving the CLEC and ends with the response message arriving at the CLEC. **2. OSS Interface Availability = (Actual Availability) / (Scheduled Availability) X 100** **Objective:** Percent of times OSS interface is <u>actually</u> available compared to <u>scheduled</u> availability.

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Reporting Dimensions:	**Excluded Situations:**
• Not carrier specific. • Not product/service specific.	• None
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • Query Type (per reporting dimension) • Response interval • Regional Scope	• Report Month • Query Type (per reporting dimension) • Response interval • Regional Scope

RNS Response Times

System	< 2.3 Sec.	> 6 Sec.	Avg. Sec.	# of Calls
RSAG				
- by TN	x	x	x	x
- by ADDR	x	x	x	x
ATLAS	x	x	x	x
DSAP	x	x	x	x
CSR	x	x	x	x
PSIMS/COFFI	x	x	x	x

LENS Response Times

System	< 2.3 Sec.	> 6 Sec.	Avg. Sec.	# of Calls
RSAG				
- by TN	x	x	x	x
- by ADDR	x	x	x	x
ATLAS	x	x	x	x
DSAP	x	x	x	x
CSR	x	x	x	x
PSIMS/COFFI	x	x	x	x

EC-LITE Response Times

System	< 2.3 Sec.	> 6 Sec.	Avg. Sec.	# of Calls
RSAG				
- by TN	x	x	x	x
- by ADDR	x	x	x	x
ATLAS	x	x	x	x
DSAP	x	x	x	x
CSR	x	x	x	x
PSIMS/COFFI	x	x	x	x

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OSS Interface Availability

Application	% Availability CLEC	% Availability BST
LENS	X	X
LEO	X	X
LESOG	X	X
EDI	X	X
CLEC TAFI	X	X
PSIMS	X	X
HAL	X	X
BOCRIS	X	X
ATLAS/COFFI	X	X
RSAG/DSAP	X	X
LMOS HOST	X	X
SOCS (update)	X	X

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ORDERING

Function:	**Ordering**
Measurement Overview:	When a customer calls their service provider, they expect to get information promptly regarding the progress on their order(s). Likewise, when changes must be made, such as to the expected delivery date, customers expect that they will be immediately notified so that they may modify their own plans. The order status measurements monitor, when compared to BST result, that the CLEC has timely access to order progress information so that the customer may be updated or notified when changes and rescheduling are necessary. Furthermore, the "% jeopardies returned" measure for the CLEC, when reported in comparison to BST result, will gauge whether initial commitments to the CLEC for order processing are as reliable as the commitments BST makes for its own operations.
Measurement Methodology:	**1. Firm Order Confirmation Timeliness = ∑ [(Date and Time of Firm Order Confirmation) - (Date and Time of Service Request Acknowledgment)] / (Number of Service Requests Confirmed in Reporting Period)** **Objective:** Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of **valid** service order request to distribution of order confirmation. **Methodology:** • Non-Mechanized Results are based on a 100% sample • Mechanized Results are based on actual data for all orders from the OSS **2. Reject Interval = ∑ [(Date and Time of Service Request Rejection) - (Date and Time of Service Request Acknowledgment)] / (Number of Service Requests Rejected in Reporting Period)** **Objective:** Reject Interval is the average reject time from receipt of service order request to distribution of rejection. **Methodology:** • Non-Mechanized Results are based on a 100% sample • Mechanized Results are based on actual data for all orders from the OSS **3. Percent Rejected Service Requests = ∑ (Total Number of Rejected Service Requests) / (Total Number of Service Requests Received) X 100.** **Objective:** Percent Rejected Service Requests is the percent of total orders received rejected due to error or omissions. **Methodology:** • Manual tracking for non flow-through service requests • Mechanized tracking for flow-through service requests

	4. Percent Flow-through Service Requests = ∑ (Total of Service Requests that flow-through to the BST OSS) / (Total Number of Service Requests delivered to BST OSS) X 100. **Objective:** Percent Flow-through Service Requests measures the percentage of orders that utilize BSTs' OSS without manual (human) intervention. **Methodology:** • Mechanized tracking for flow-through service requests **5. Total Service Request Cycle Time = (∑ Date & Time CLEC Service Requests placed in queue for completion) - (∑ Date & Time CLEC Service Requests first reaches BST Interface) / Total Number of Service Requests** **Objective:** The average time it takes to process a CLEC service request, measured from the first time the request reaches the BST interface to the order being placed in queue for completion. Comparisons can be made to equivalent BST cycle times to assure the CLEC of processing parity. Service Request Cycle Time captures both reject and commitment intervals. **Methodology:** Mechanized tracking for flow-through orders **6. Service Requests submissions per request = ∑ (Total Service Requests that flow-through to the BST OSS) + (Total Rejects) / (Total Service Requests Received)** **Objective:** Measures the average number of times the same service request is resubmitted due to changes and/or updates. **Methodology:** Mechanized tracking for flow-through service requests **7. Speed of Answer in Ordering Center = ∑ (Total time in seconds to reach LCSC) / (Total # of Calls) in Reporting Period.** **Objective:** Measures the average time to reach a BST representative. This can be an important measure of adequacy in a manual environment or even in a mechanized environment where CLEC service representatives have a need to speak with their BST peers. **Methodology:** Mechanized tracking through LCSC Automatic Call Distributor.

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Reporting Dimensions:	Excluded Situations:
• See Appendix A, item 1 • See Appendix A, item 4	• Firm Order Confirmation Interval - Invalid Service Requests • Rejection Interval • Percent Rejected Service Requests - None • Percent Flow-through Service Requests - Rejected Service Requests • Service Requests canceled by the CLEC • Service Request Activities of BSTassociated with internal or administrative use of local services.
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • Interval for FOC • Reject Interval • Total number of LSRs • Total number of Errors • Adjusted Error Volume • Total number of flow through service requests • Adjusted number of flow through service requests • Geographic Scope	• Report Month • Interval for FOC • Reject Interval • Total number of LSRs • Total number of Errors • Adjusted Error Volume • Total number of flow through service requests • Adjusted number of flow through service requests • Geographic Scope

Firm Order Confirmation Timeliness

		Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

Reject Timeliness

		Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

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Percent Rejected Service Requests

		Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

Percent Flow-Through Service Requests

		Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

Service Request Cycle Time

		Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

Service Request Submissions per Request

		Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

Speed of Answer in Ordering Center

	Ave. Answer time (Sec.) / month	Ave. Answer time (Sec.) / year
LCSC	X	X

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PROVISIONING

Function:	**Order Completion Intervals**
Measurement Overview:	The "average completion interval" measure monitors the time required by BST to deliver integrated and operable service components requested by the CLEC, regardless of whether resale services or unbundled network elements are employed. When the service delivery interval of BST is measured for comparable services, then conclusions can be drawn regarding whether or not CLECs have a reasonable opportunity to compete for customers. The "order completion interval distribution" measure monitors the reliability of BST commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customer. In addition, when monitored over time, the "average completion interval" and "percent completed on time" may prove useful in detecting developing capacity issues.
Measurement Methodology:	**1. Average Completion Interval = $\sum$ [(Completion Date & Time) - (Order Submission Date & Time)] / (Count of Orders Completed in Reporting Period)** **2. Order Completion Interval Distribution = $\sum$ (Service Orders Completed in "X" days) / (Total Service Orders Completed in Reporting Period) X 100** The actual completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from BST receipt of a syntactically correct order from the CLEC to BST's return of a valid completion notification to the CLEC. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed within the reporting period. The distribution of completed orders is determined by first counting, for each specified reporting dimension, both the total numbers of orders completed within the reporting interval and the number of orders completed by the committed due date (as specified on the initial FOC returned to the CLEC). For each reporting dimension, the resulting count of orders completed for each specified time period following the committed due date is divided by the total number of orders completed with the resulting fraction expressed as a percentage. **Objective:** Average time from receipt of (confirmed) service request to actual order completion date. Excludes orders where customer requested dates are beyond offered interval. **Methodology:** • Mechanized metric from ordering system • If mechanical not available, a (BST & CLEC) statistically validated sample should be used.

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Reporting Dimensions:	Excluded Situations:
• See Appendix A, item 2 • See Appendix A, item 4	• Orders where customer requested dates are beyond offered interval
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • CLEC Order Number • Order Submission Date • Order Submission Time • Order Completion Date • Order Completion Time • Service Type • Activity Type • Geographic Scope	• Report Month • Average Order Completion Interval • Order Completion by Interval • Service Type • Activity Type • Geographic Scope

Order Completion Interval Distribution **Average Completion Interval**

UNE LOOPS	Same Day	1	2	3	4	5	>5	Total	Ave. Completion Interval
Dispatch									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
No Dispatch									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x

UNE LOOPS w/ ILNP	Same Day	1	2	3	4	5	>5	Total	Ave. Completion Interval
Dispatch									
< 5 circuits	x	x	x	x	x	x	x	x	x
>= 5 circuits	x	x	x	x	x	x	x	x	x
No Dispatch									
< 5 circuits	x	x	x	x	x	x	x	x	x
>= 5 circuits	x	x	x	x	x	x	x	x	x

TRUNKS	5 Days	10	15	20	25	30	>30	Total	Ave. Completion Interval
Dispatch % < 10 days	x	x	x	x	x	x	x	x	x
No Dispatch % < 10 days	x	x	x	x	x	x	x	x	x

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Order Completion Interval Distribution — **Average Completion Interval**

RESALE RESIDENCE	Same Day	1	2	3	4	5	>5	Total	Ave. Completion Interval
Dispatch									
LCSC orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
BST orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
No Dispatch									
LCSC orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
BST orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x

RESALE BUSINESS	Same Day	1	2	3	4	5	>5	Total	Ave. Completion Interval
Dispatch									
LCSC orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
BST orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
No Dispatch									
LCSC orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
BST orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x

RESALE SPECIALS	Same Day	1	2	3	4	5	>5	Total	Ave. Completion Interval
Dispatch									
LCSC orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
BST orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
No Dispatch									
LCSC orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x
BST orders									
< 10 circuits	x	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x	x

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PROVISIONING

Function:	**Held Orders**
Measurement Overview:	When delays occur in completing CLEC orders, the average period that CLEC orders are held for BST reasons, pending a delayed completion, should be no worse for the CLEC when compared to BST orders.
Measurement Methodology:	**1. Mean Held Order Interval = ∑ (Reporting Period Close Date - Committed Order Due Date) / (Number of Orders Pending and Past The Committed Due Date) for all orders pending and past the committed due date.** This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as "completed" via a valid completion notice and have passed the currently "committed completion date" for the order. For each such order the number of calendar days between the committed completion date and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings in Appendix A, item 2, and the reason for the order being held, if identified. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval. **(# of Orders Held for ≥ 90 days) / (Total # of Orders Pending But Not Completed) X 100.** **(# of Orders Held for ≥ 15 days) / (Total # of Orders Pending But Not Completed) X 100.** This "percentage orders held" measure is complementary to the held order interval but is designed to detect orders continuing in a "non-completed" state for an extended period of time. Computation of this metric utilizes a subset of the data accumulated for the "held order interval" measure. All orders, for which the "held order interval" equals or exceeds 90 or 15 days, are counted for order type. The total number of pending and past due orders for order type are counted (as was done for the held order interval) and divided into the count of orders held past 90 or 15 days. **Objective:** Average time to detect orders continuing in a "non-complete" state for extended period of time.

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Reporting Dimensions:	**Excluded Situations:**
• See Appendix A, item 2 • See Appendix A, item 4	• Any order canceled by the CLEC will be excluded from this measurement. • Orders held for CLEC end user reasons • Orders held for BST end user reasons • Order Activities of BST associated with internal or administrative use of local services.
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • CLEC Order Number • Order Submission Date • Committed Due Date • Service Type • Hold Reason • Geographic Scope	• Report Month • Average Held Order Interval • Standard Error for the Average Held Order Interval • Service Type • Hold Reason • Geographic Scope

Mean Held Order Interval

		Dispatch		No-Dispatch		Dispatch		No-Dispatch	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks									
>= 90 days	X								
>= 15 days	X								
UNE									
>= 90 days						X	X	X	X
>= 15 days						X	X	X	X
Resale - Residence									
>= 90 days						X	X	X	X
>= 15 days						X	X	X	X
Resale - Business									
>= 90 days						X	X	X	X
>= 15 days						X	X	X	X
Resale - Specials									
>= 90 days						X	X	X	X
>= 15 days						X	X	X	X
UNE - Loops w/LNP									
>= 90 days		X	X	X	X				
>= 15 days		X	X	X	X				

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PROVISIONING

Function:	**Installation Timeliness, Quality & Accuracy**
Measurement Overview:	The "percent missed installation appointments" measure monitors the reliability of BST commitments with respect to committed due dates to assure that CLECs can reliably quote expected due dates to their retail customer. Percent Provisioning Troubles within 30 days of Installation measures the quality of installation activities and Percent Order Accuracy measures the accuracy with which services ordered by the CLECs were provided.
Measurement Methodology:	**1. Percent Missed Installation Appointments = ∑ (Number of Orders missed in Reporting Period) / (Number of Orders Completed in Reporting Period) X 100** Percent Missed Installation Appointments is the percentage of total orders processed for which BST notifies the CLEC that the work will not be completed as committed on the original FOC. The measurement result is derived by dividing the count on misses BST issues to the CLEC by the count of FOCs returned by BST during the identical period. **Objective:** Percent of orders where completion's are not done by due date on order confirmation. Misses due to competing carrier or end user causes should be aggregated out and indicated. **Methodology:** • Mechanized metric from ordering system **2. % Provisioning Troubles within 30 days of Installation = ∑ (All Troubles on Services installed ≤ 30 days in a calendar month) / (All Installations in same calendar month) X 100** **Objective:** Measures the quality of completed orders **Methodology:** Mechanized metric from ordering system **3. Percent Order Accuracy = (∑ Orders Completed w/o error) / (∑ Orders Completed) X 100.** **Objective:** Measures the accuracy and completeness of BST provisioning or disconnecting service by comparing what was ordered and what was completed. **Methodology:** • Non-Mechanized Results are based on an audit of a statistically valid sample • Mechanized Results are based on an audit of a statistically valid sample

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Reporting Dimensions:	Excluded Situations:
• See Appendix A, item 2 • See Appendix A, item 4	• None
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • CLEC Order Number • Order Submission Date • Order Submission Time • Status Type • Status Notice Date • Status Notice Time • Standard Order Activity • Geographic Scope	• Report Month • BST Order Number • Order Submission Date • Order Submission Time • Status Type • Status Notice Date • Status Notice Time • Standard Order Activity • Geographic Scope

Percent Missed Appointments

		Dispatch		No-Dispatch		Dispatch		No-Dispatch	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

Percent Provisioning Troubles within 30 days of Installation

		Dispatch		No-Dispatch		Dispatch		No-Dispatch	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

Percent Provisioning Order Accuracy

		Dispatch		No-Dispatch		Dispatch		No-Dispatch	
	%<10 days	<5 ckts	>=5 ckts	<5 ckts	>=5 ckts	<10 ckts	>=10 ckts	<10 ckts	>=10 ckts
Trunks	X								
UNE						X	X	X	X
UNE (Specials)						X	X	X	X
Resale - Residence						X	X	X	X
Resale - Business						X	X	X	X
Resale - Specials						X	X	X	X
UNE - Loops w/LNP		X	X	X	X				

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MAINTENANCE & REPAIR (MR)

Function:	**Customer Trouble Report Rate**
Measurement Overview:	This measure can be used to establish that CLECs are not competitively disadvantaged, compared to BST, as a result of experiencing more frequent incidents of trouble reports.
Measurement Methodology:	**1. Customer Trouble Report Rate = (Count of Initial & Repeated Trouble Reports in the Current Period) / (Number of Service Access Lines in Service at End of the Report Period) X 100.** ***Note: Local Interconnection Trunks are reported only as total troubles. No meaningful count of lines in service exists.*** The frequency of trouble metric is computed by accumulating the total number of maintenance tickets logged by a CLEC (with BST) during the reporting period. The resulting number of tickets is divided by the total number of "service access lines" existing for the CLEC at the end of the report period. **Objective:** Initial customer direct or referred troubles reported within a calendar month where cause is in the network (not customer premises equipment, inside wire, or carrier equipment) per 100 lines/circuits in service. **Methodology:** Mechanized metric trouble reports and lines in service captured in maintenance database(s).

Reporting Dimensions:	**Excluded Situations:**
• See Appendix A, item 3 • See Appendix A, item 4	• Trouble tickets canceled at the CLEC request • BST trouble reports associated with administrative service • Instances where the CLEC or BST customer requests a ticket be "held open" for monitoring
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • CLEC Ticket Number • Ticket Submission Date • Ticket Submission Time • Ticket Completion Time • Ticket Completion Date • Service Type • WTN or CKTID (a unique identifier for elements combined in a service configuration) • Disposition and Cause • Geographic Scope	• Report Month • BST Ticket Number • Ticket Submission Date • Ticket Submission Time • Ticket Completion Time • Ticket Completion Date • Service Type • WTN or CKTID (a unique identifier for elements combined in a service configuration) • Disposition and Cause • Geographic Scope

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Customer Trouble Report Rate

	ALL	Dispatch	No-Dispatch	Dispatch		No-Dispatch	
				Residence	Business	Residence	Business
Interconnection Trunks	X						
UNE		X	X				
Resale				X	X	X	X
Resale - Specials	X						

Note: Local Interconnection Trunks are reported only as total troubles. No meaningful count of lines in service exists.

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MAINTENANCE & REPAIR (MR)

Function:	**Missed Repair Appointments**
Measurement Overview:	When this measure is collected for BST and CLEC and then compared, it can be used to establish that CLECs are receiving equally reliable (as compared to BST operations) estimates of the time required to complete service repairs.
Measurement Methodology:	**2. Percentage of Missed Repair Appointments = (Count of Customer Troubles Not Resolved by the Quoted Resolution Time and Date) / (Count of Customer Trouble Tickets Closed) X 100.** Percent of trouble reports not cleared by date and time committed. Appointment intervals vary with force availability in the POTS environment. Specials and Trunk intervals are standard interval appointments of no greater than 24 hours. **Objective:** This measurement is designed to show parity between CLECs and BST in the handling of repair appointments. **Methodology:** Mechanized metric from maintenance database(s).

Reporting Dimensions:	**Excluded Situations:**
• See Appendix A, item 3 • See Appendix A, item 4	• Trouble tickets canceled at the CLEC request • BST trouble reports associated with administrative service • Instances where the CLEC or BST customer requests a ticket be "held open" for monitoring
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • CLEC Ticket Number • Ticket Submission Date • Ticket Submission Time • Ticket Completion Time • Ticket Completion Date • Service Type • WTN or CKTID (a unique identifier for elements combined in a service configuration) • Disposition and Cause • Geographic Scope	• Report Month • BST Ticket Number • Ticket Submission Date • Ticket Submission Time • Ticket Completion Time • Ticket Completion Date • Service Type • WTN or CKTID (a unique identifier for elements combined in a service configuration) • Disposition and Cause • Geographic Scope

Missed Repair Appointments

	ALL	Dispatch	No-Dispatch	Dispatch		No-Dispatch	
				Residence	Business	Residence	Business
Interconnection Trunks							
UNE		X	X				
Resale				X	X	X	X
Resale - Specials							

Note: There is no measurement for Interconnection Trunks or Specials. These are handled on a 1st come, 1st serve basis. The appropriate measurement for these is average duration.

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MAINTENANCE & REPAIR (MR)

Function:	**Quality of Repair & Time to Restore**
Measurement Overview:	This measure, when collected for both the CLEC and BST and compared, monitors that CLEC maintenance requests are cleared comparably to BST maintenance requests.
Measurement Methodology:	**3. Out of Service > 24 Hours = (Total Repeat Troubles > 24 Hours) / (Total Troubles) X 100** **4. Percent Repeat Troubles within 30 Days = (Total Repeated Trouble Reports within 30 Days) / (Total Troubles) X 100** **5. Maintenance Average Duration = (Total Duration Time) / (Total Troubles)** For Out of Service Troubles (no dial tone, cannot be called or cannot call out): the percentage of troubles cleared in excess of 24 hours. For Percent Repeat Trouble Reports within 30 Days: Trouble reports on the same line/circuit as a previous trouble report within the last 30 calendar days as a percent of total troubles reported. For Average Duration: Average time from receipt of a trouble until trouble is status cleared **Objective:** These measurements are used to demonstrate quality of maintenance and repair. **Methodology:** Mechanized metric from maintenance database(s).

Reporting Dimensions:	**Excluded Situations:**
• See Appendix A, item 3. • See Appendix A, item 4.	• Trouble tickets canceled at the CLEC request • BST trouble reports associated with administrative service • Instances where the CLEC or BST customer requests a ticket be "held open" for monitoring
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • Total Tickets • CLEC Ticket Number • Ticket Submission Date • Ticket Submission Time • Ticket Completion Time • Ticket Completion Date • Total Duration Time • Service Type • WTN or CKTID (a unique identifier for elements combined in a service configuration) • Disposition and Cause • Geographic Scope	• Report Month • Total Troubles • Percentage of Customer Troubles Out of Service > 24 Hours • Total and Percent Repeat Trouble Reports with 30 Days • Total Duration Time • Service Type • Disposition and Cause • Geographic Scope

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Out of Service more than 24 Hours

	ALL	Dispatch	No-Dispatch	Dispatch		No-Dispatch	
				Residence	Business	Residence	Business
Interconnection Trunks							
UNE		X	X				
Resale				X	X	X	X
Resale - Specials							

Note: There is no measurement for Interconnection Trunks or Specials. These are handled on a 1st come, 1st serve basis. The appropriate measurement for these is average duration

Repeat Trouble Reports within 30 days of Installation (or New Service Failure Rate - see note below)

	ALL	Dispatch	No-Dispatch	Dispatch		No-Dispatch	
				Residence	Business	Residence	Business
Interconnection Trunks	X						
UNE		X	X				
Resale				X	X	X	X
Resale - Specials	X						

Note: The appropriate measurement for both interconnection trunking and Resale - Specials is the "New Service Failure Rate"

Maintenance Average Duration

	ALL	Dispatch	No-Dispatch	Dispatch		No-Dispatch	
				Residence	Business	Residence	Business
Interconnection Trunks	X						
UNE		X	X				
Resale				X	X	X	X
Resale - Specials	X						

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MAINTENANCE & REPAIR (MR)

Function:	**Average Answer Time - Repair Centers**
Measurement Overview:	• This measure demonstrates an average response time for the CLEC agent attempting to contact their BST representative
Measurement Methodology:	**6. Average Answer Time for UNE Center, RRC & BRC = (Total time in seconds for UNE Center, RRC & BRC response) / (Total number of calls) by reporting period** **Objective:** This measure supports monitoring that BSTs handling of support center calls from CLECs is at least in parity with support center calls by BST's retail customer. **Methodology:** Mechanized report from Repair Center Automatic Call Distributors.

Average Answer Time for Repair Center

	Ave. Answer time (Sec.) / month	Ave. Answer time (Sec.) / year
UNE Center	X	X
RRC	X	X
BRC	X	X

MAINTENANCE & REPAIR (MR)

Function:	**Legacy System Access Times**
Measurement Overview:	• This measure demonstrates an average response time from the BST Maintenance System (TAFI) to access BST's Legacy Repair OSS.
Measurement Methodology:	**1. Legacy System Access Times = Access Times in increments of ≤ 4 secs., > 4 & ≤ 6 secs., ≤ 10 secs., > 10 secs., and > 30 secs. for CLEC TAFI and BST TAFI** **Objective:** This measure demonstrates parity between the CLECs and BST for OSS response times for Maintenance and Repair. **Methodology:** Mechanized report from OSSs

Legacy System Access Times

	≤ 4 secs			> 4 & ≤ 6 secs			≤ 10 secs			> 10 secs			> 30 secs		
Transaction Name	CLEC	BST BUS	BST RES	CLEC	BST RES	BST BUS	CLEC	BST RES	BST BUS	CLEC	BST RES	BST BUS	CLEC	BST RES	BST BUS
CRIS	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
DLETH	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
DLR	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
JMOS	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
LMOS	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
LMOSupd	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MARCH	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Predictor	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
SOCS	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
LNP	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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BILLING

Function:	**Invoice Accuracy & Timeliness**
Measurement Overview:	The accuracy of billing records (both usage and invoices) delivered by BST to the CLEC must provide CLECs with the opportunity to deliver bills at least as accurate as those delivered by BST. Producing and comparing this measurement result for both the CLEC and BST allows a determination as to whether or not parity exists.
Measurement Methodology:	**1. Invoice Accuracy = [(Number of Invoices Delivered in the Reporting Period that Have Complete Information, Reflect Accurate Calculations and are Properly Formatted) / (Total Number of Invoices Issued in the Reporting Period)] X 100** **2. Mean Time to Deliver Invoices = ∑ [(Invoice Transmission Date) - (Date of Scheduled Bill Cycle Close)] / (Count of Invoices Transmitted in Reporting Period)** Invoice Accuracy: The completeness of content, accuracy of information and conformance of formatting will be determined based upon the terms of the individual CLEC interconnection agreements with BST. Mean Time to Deliver Invoices: This measure captures the elapsed number of days between the scheduled close of a Bill Cycle and BST's successful transmission of the associated invoice to the CLEC. For each invoice, the calendar date of the scheduled close of Bill Cycle is compared to the calendar date that successful invoice transmission to the CLEC completes. The number of calendar days elapsed between scheduled Bill Cycle close and completion of invoice transmission will constitute the elapsed delivery time. The elapsed delivery time is accumulated for each invoice with the resulting total number of days accumulated being divided by the number of complete invoices sent in the reporting period. **Objective:** Measures the percentage and mean time of billing records delivered to CLEC in agreed upon format and with the complete agreed upon content (includes time and material and other non-recurring charges). **Methodology: ?**

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Reporting Dimensions:	**Excluded Situations:**
• Wholesale Bill Invoices (TSR) • Unbundled Element Invoices (UNE)	• Any invoices rejected due to formatting or content errors
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • Invoice Type • Mean Delivery Interval • Standard Error of Delivery Interval • Accuracy	

Invoice Accuracy

	Total Invoices Delivered	Total Invoices Delivered per EMR	% Accuracy
CLEC	X	X	X

Mean Time to Deliver Invoices

To Be Determined