was between 1 and -1 in June, August and October and between -1 nad -2 in July, September and November through January (negative indicates service for CLEC is "better" than for SWBT).

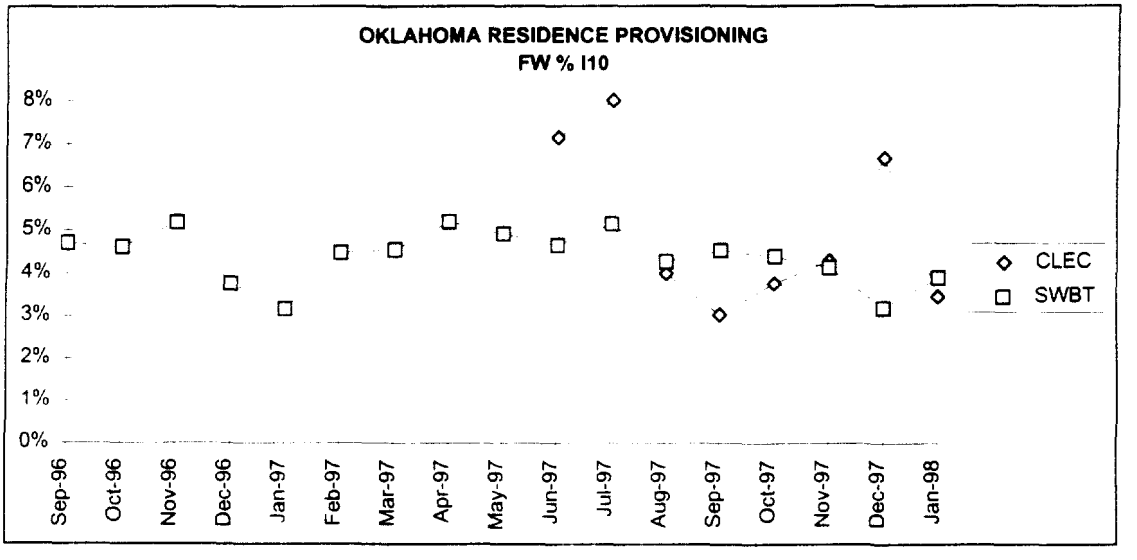
55. **Design Services Percent SWBT Caused Missed Due Dates** measures the percentage of N, T and C orders identified as company misses during the life of the service order. This measure is determined in respect to the original due date unless a new due date is requested by the customer. This measurement will be reported for individual CLECs, for all CLECs in the aggregate and for SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

56. **UNE Percent SWBT Caused Missed Due Dates** measures the Percent of UNE N, T and C orders where installations are not completed by the negotiated due date, excluding installation delays caused by the customer. This measurement is reported for individual CLECs and for all CLECs in the aggregate by loop type [2-Wire Analog 8dB Loop, BRI (2-Wire Digital Loop), and PRI (DS1 Loop)], switch port (Analog, Analog DID, BRI and PRI) and unbundled dedicated transport.

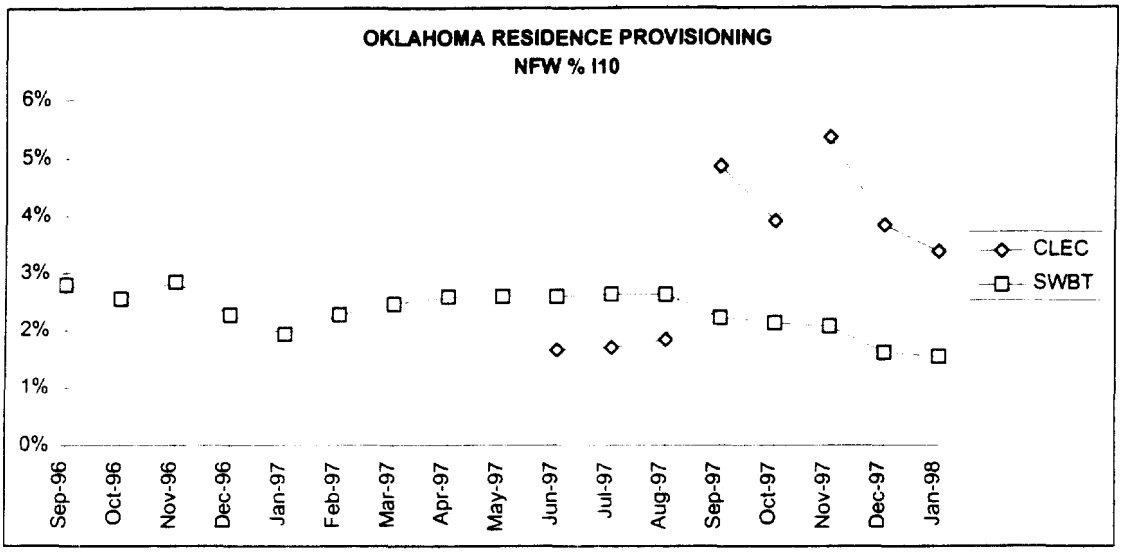
57. **POTS Percent Installation Reports Within 10 Days (I-10)** measures the percent of N,T and C orders that receive a network customer trouble report other than those caused by CPE or inside wiring within 10 calendar days of service order completion excluding subsequent reports and all disposition code "13"

reports (excludable reports). Code 13 reports are generally informational and are not related to a service problem, i.e., requests for directories or requests for information. This measurement will be reported for individual CLECs, for all CLECs and for SWBT by Business and Residence.

58. The charts below show a comparison between the aggregate CLEC data and SWBT data for the residence POTS installation reports (I10) within 10 days broken down by FW and NFW.

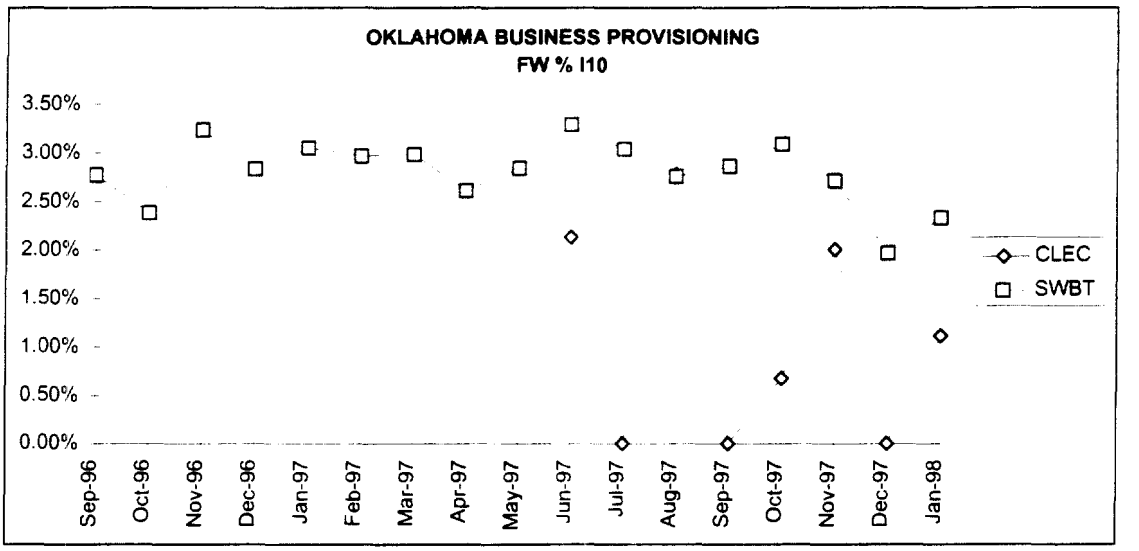


This chart indicates that the CLECs experience equivalent residence FW percent installation reports within 10 days to that of SWBT. The sample was large enough to produce valid results for September through January. The standard deviation was between 1 and -1 in October, November and January, between -1 and -2 in September and exceeded 3 in December (negative indicates service for CLEC is "better" than for SWBT).

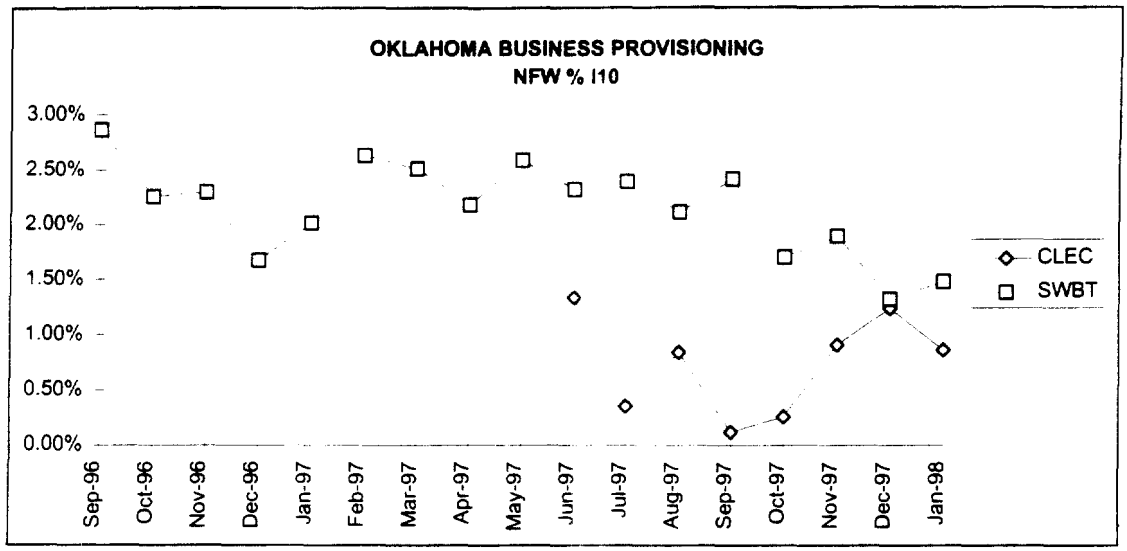


Although the aggregate data for residence POTS NFW percent installation reports within 10 days shows the CLEC data to be different than that of SWBT by greater than 3 standard deviations for September through January, this does not in itself necessarily indicate discriminatory service is being provide by SWBT to the CLEC. The business POTS NFW percent installation reports within 10 days contains data for N, T and C orders. If the distribution of N, T and C orders is not the same for the CLECs as it is for SWBT, then the two means appear different but the service provided to the CLEC by order type is not. SWBT is in the process of further breaking this measurement down to identify if in fact the difference in the data is a result of a difference in the service being provided to the CLECs or a difference in the distribution of the types of orders being issued by the CLEC from those being issued by SWBT.

59. The charts below show a comparison between the aggregate CLEC data and SWBT data for the business POTS installation reports (I10) within 10 days broken down by FW and NFW.



This chart indicates that the CLEC's experience a lower percentage of business FW POTS installation reports within 10 days. The standard deviation was between 0 and -1 in June, August, November and January and between -1 and -2 in July, September, October and December (negative indicates service for CLEC is "better" than for SWBT).



This chart indicates that the CLEC's experience a lower percentage of business NFW POTS installation reports within 10 days than SWBT. The standard deviation was between 0 and -1 in June and December, between -1 and -3 in July, August, November and January and exceeded -3 in September and October (negative indicates service for CLEC is "better" than for SWBT).

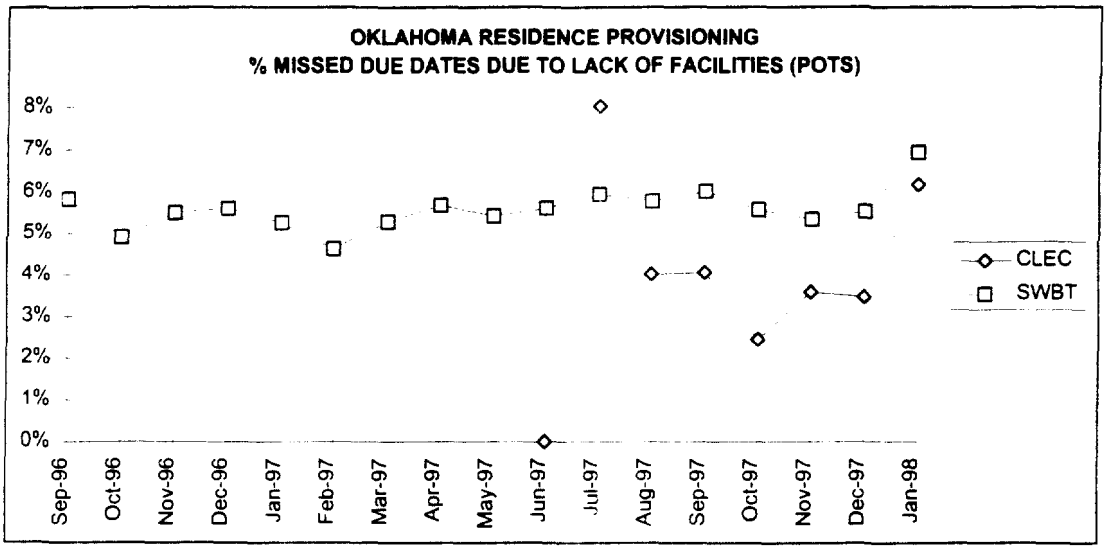
60. **Design Services Percent Installation Reports Within 30 Days (I-30)** measures the percent of N,T and C orders by item that receive a network customer trouble report within 30 calendar days of service order completion. This measure is reported for individual CLECs, for all CLECs in the aggregate and for SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

61. **UNE Percent Installation Reports Within 30 Days (I-30)** measures the percent UNE N,T and C orders by item that receive a network customer trouble report within 30 calendar days of service order completion. This measurement is

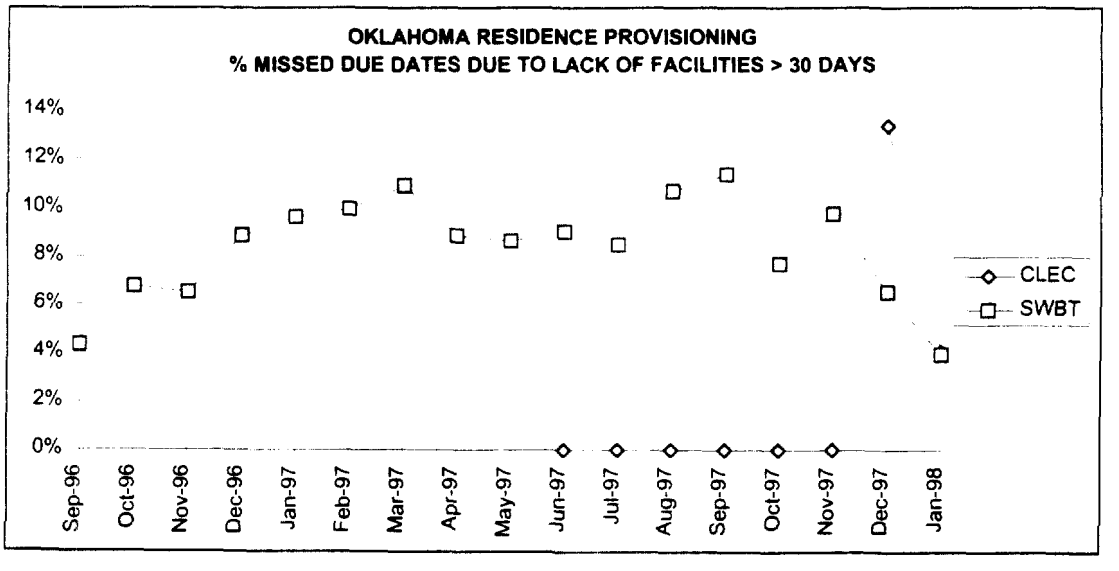
reported for individual CLECs and for all CLECs in the aggregate by loop type [2-Wire Analog 8dB Loop, BRI (2-Wire Digital Loop), and PRI (DS1 Loop)], switch port (Analog, Analog DID, BRI and PRI) and unbundled dedicated transport.

62. **Percent Company Missed Due Dates Due To Lack Of Facilities** measures the percent of N,T and C orders with missed committed due dates due to lack of facilities. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT with respect to Retail POTS, special circuits and UNEs. The measurement will be reported for orders with due dates missed by > 30 calendar days and > 90 calendar days. (Calculated monthly based on posted orders.)

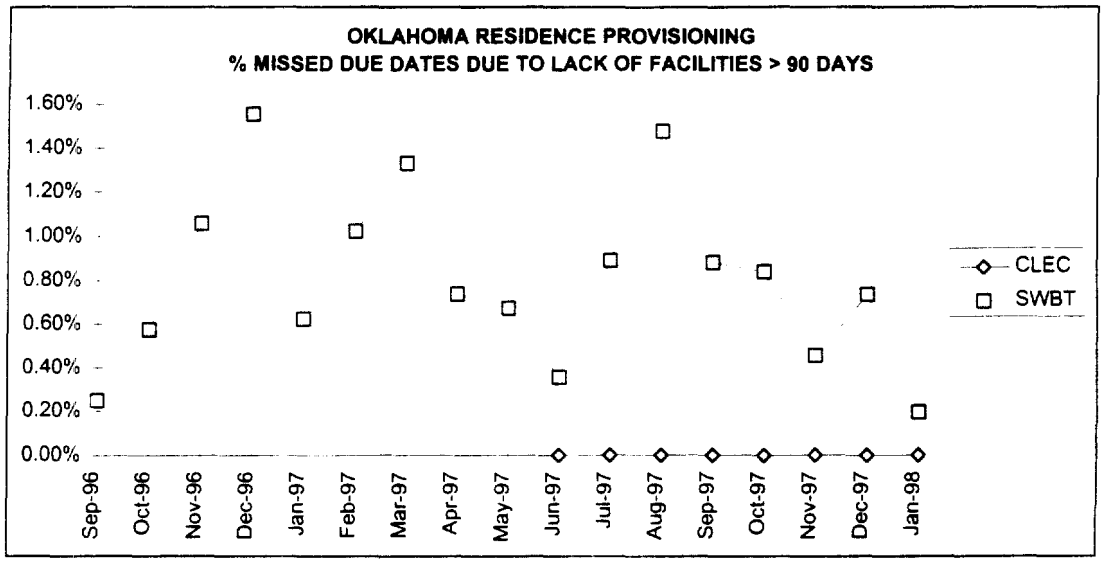
63. The charts below show a comparison between the aggregate CLEC data and SWBT data for residence POTS percent missed due dates due to lack of facilities, broken down by missed due dates, missed due greater than 30 days and missed due dates greater than 90 days.



This chart indicates that the CLEC's experience a lower percentage of residence POTS missed due dates due to lack of facilities than SWBT. The sample is sufficient to produce a reliable test for September through January. The standard deviation exceeds -3 in October, between -1 and -3 in September, November and December and between 0 and -1 in January (negative indicates service for CLEC is "better" than for SWBT).

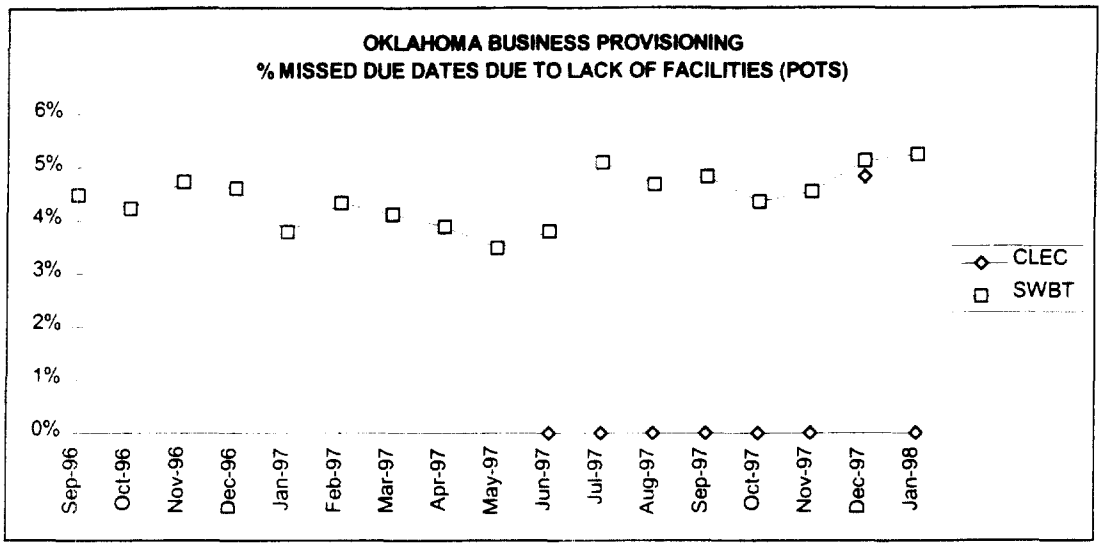


This chart indicates that CLECs experience fewer missed due dates due to lack of facilities that are greater than 30 days than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.

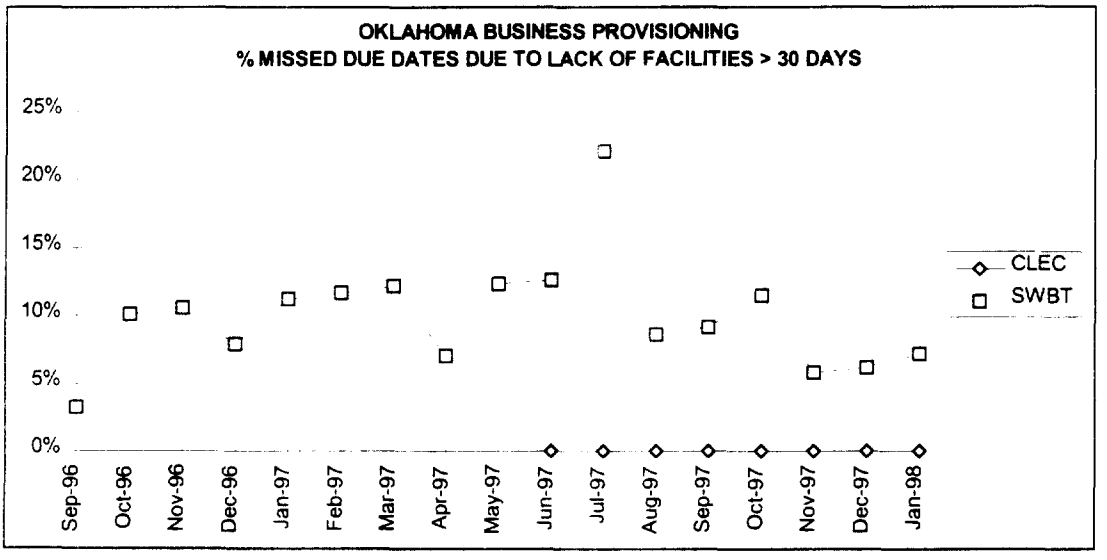


This chart indicates that CLECs experience fewer missed due dates due to lack of facilities that are greater than 90 days than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.

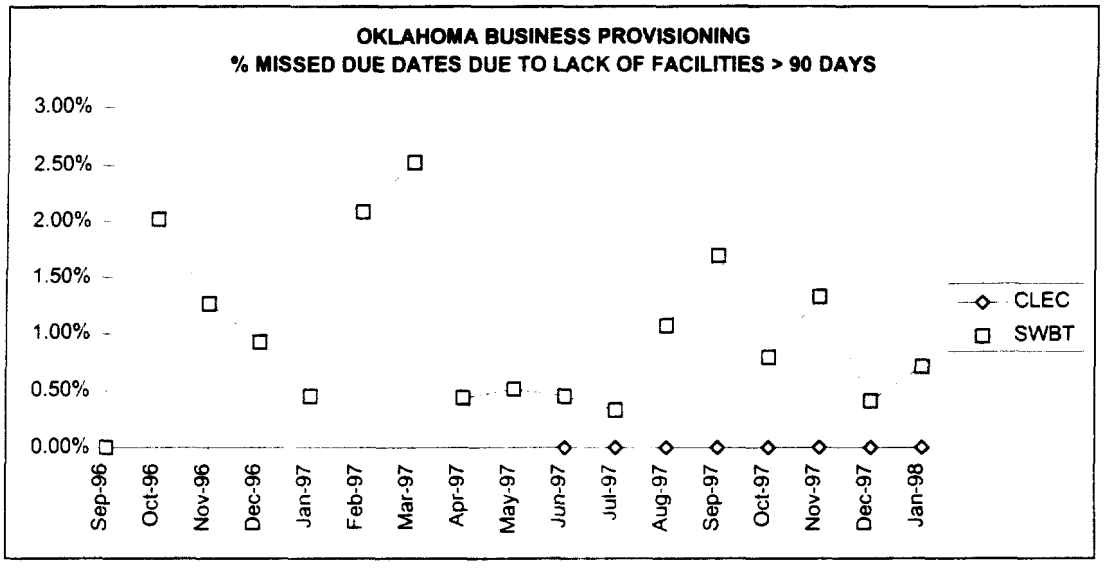
64. The charts below show a comparison between the aggregate CLEC data and SWBT data for business POTS percent missed due dates due to lack of facilities, broken down by missed due dates, missed due greater than 30 days and missed due dates greater than 90 days.



This chart indicates that CLECs experience fewer missed due dates due to lack of facilities than SWBT. The standard deviation was between -1 and -3 in June through November and January and between 0 and -1 in December (negative indicates service for CLEC is "better" than for SWBT).



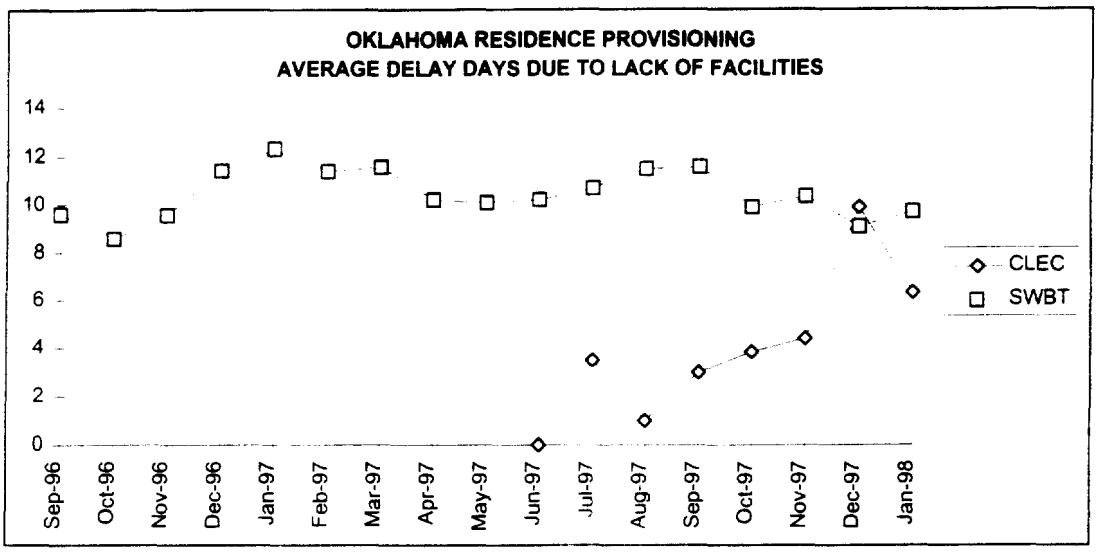
This chart indicates that CLECs experience fewer missed due dates due to lack of facilities that are greater than 30 days than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.



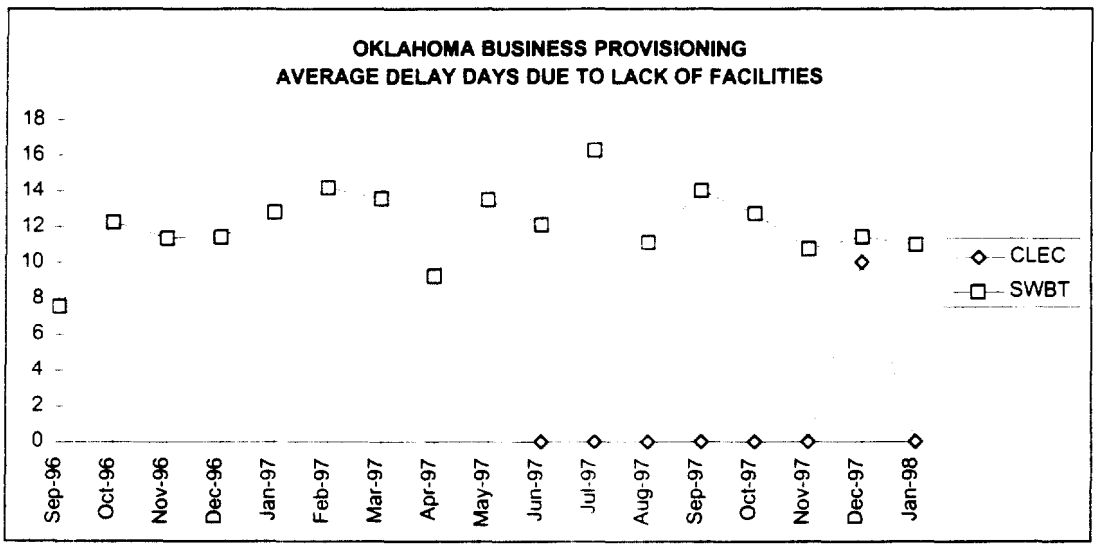
This chart indicates that CLECs experience fewer missed due dates due to lack of facilities that are greater than 90 days than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.

65. **Delay Days for Missed Due Dates Due to Lack of Facilities** measures the average calendar days from due date to completion date on company missed orders due to lack of facilities. This measurement will be reported for individual CLECs, for all CLECs in the aggregate and for SWBT Retail with respect to POTS, Specials and UNE.

66. The charts below show a comparison between the aggregate CLEC data and SWBT data for residence POTS average delay days due to lack of facilities, broken down residence and business.



This chart indicates that CLECs experience a lower average delay days for residence than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.



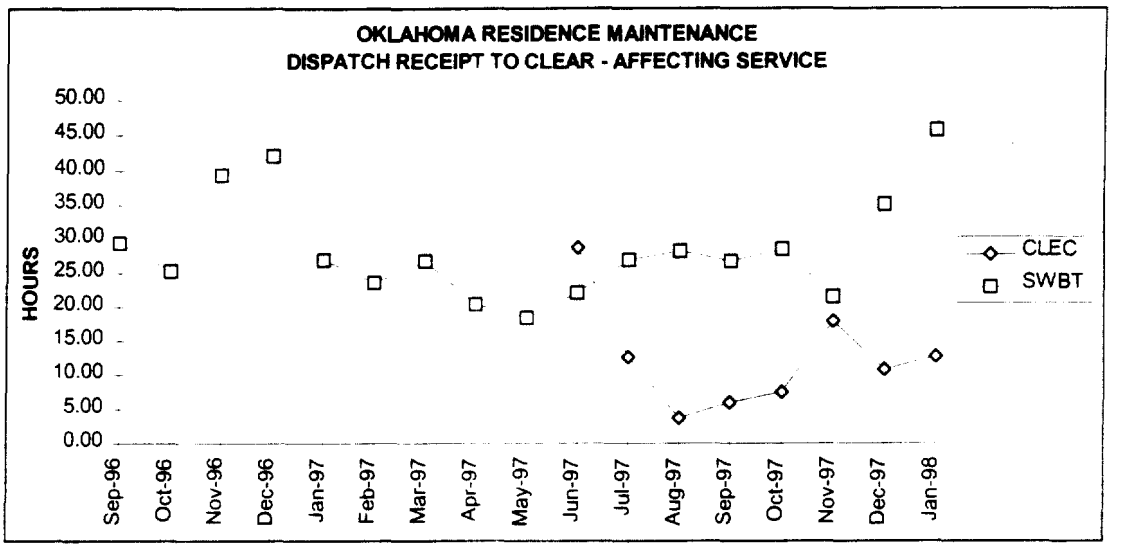
This chart indicates that CLECs experience a lower average delay days for business than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.

MAINTENANCE MEASUREMENTS

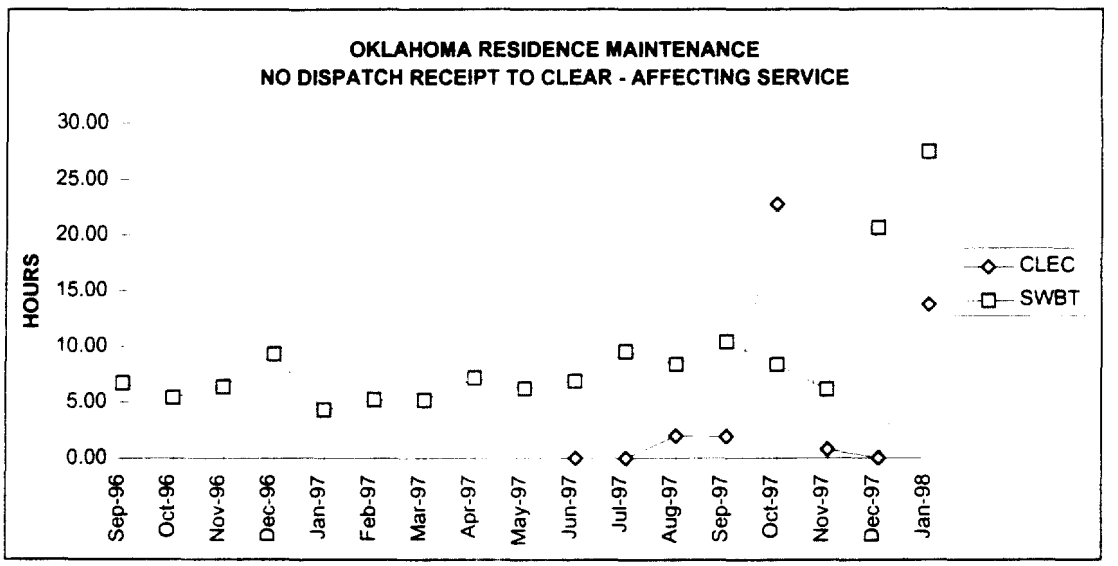
67. In the following paragraphs I describe the thirteen maintenance performance measurements SWBT has agreed to provide CLECs based on negotiations with CLECs, FCC rulings and discussions with the Department of Justice. SWBT is willing to negotiate additional measurements on a case by case basis with the CLECs.

68. **POTS Receipt To Clear Duration** measures the average duration of customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared with the customer, excluding subsequent and all disposition code "13" excludable reports. This measurement is reported for individual CLECs, for all CLECs in the aggregate and SWBT retail for out of service trouble reports and troubles affecting service in the dispatched and no-dispatched categories.

69. The charts below show a comparison between the aggregate CLEC data and SWBT data for residence maintenance POTS receipt to clear, broken down by affecting service and out of service for dispatch and no dispatch.

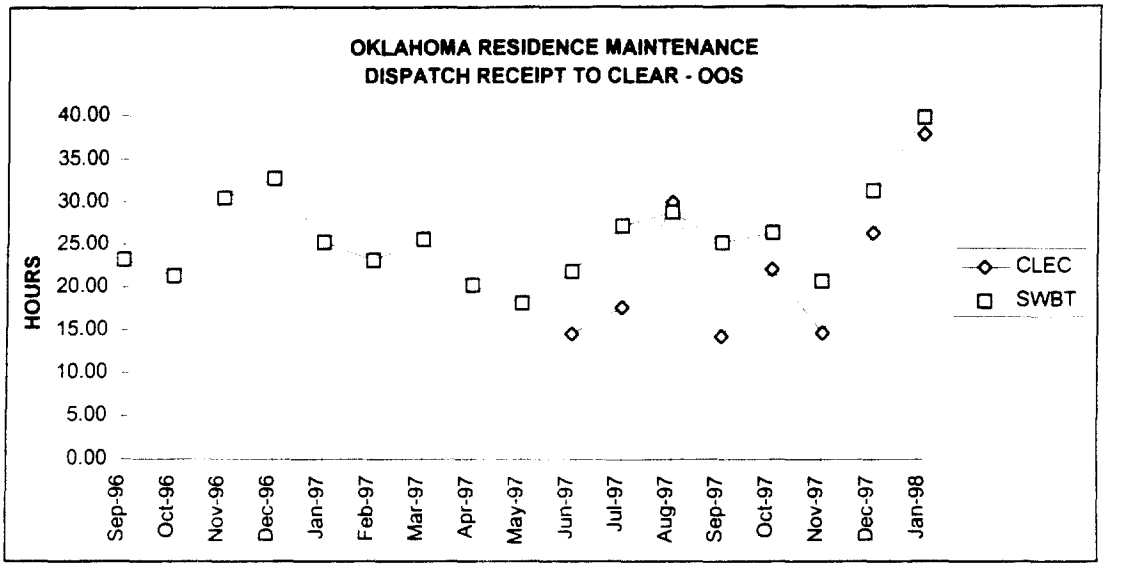


This chart indicates that CLECs experience faster repair times for affecting service reports that are dispatched than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.

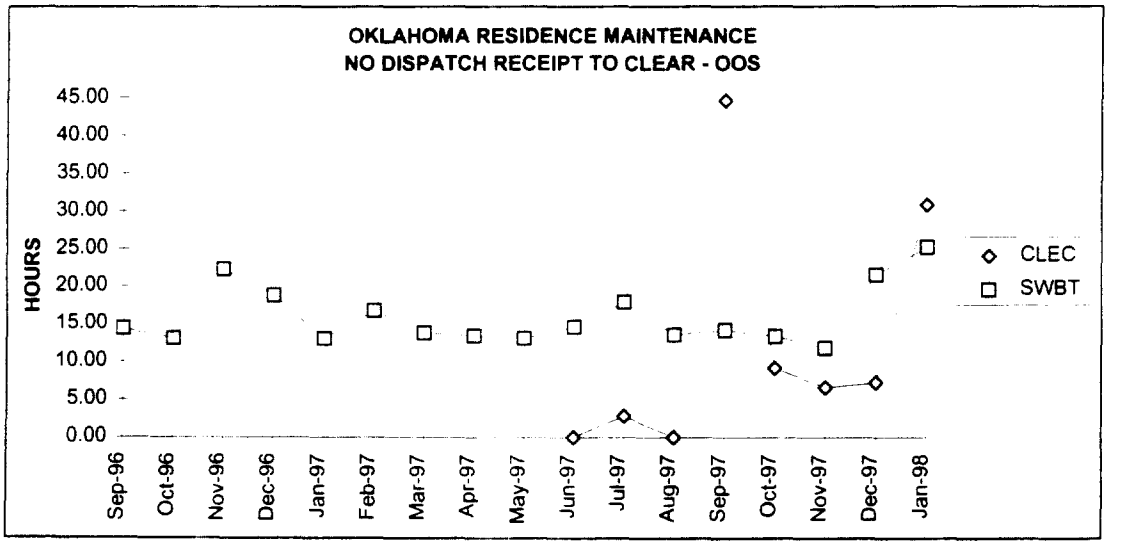


This chart indicates that CLECs experience faster repair times for affecting service reports that are not dispatched with the exception of October. However,

[redacted]



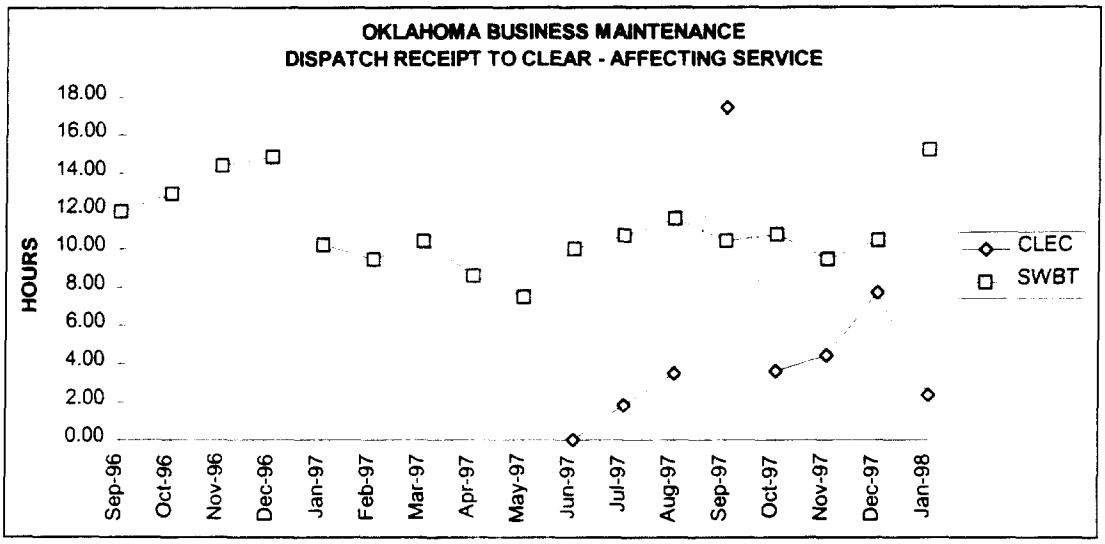
This chart indicates that CLECs experience faster repair times for out of service reports that are dispatched. The sample is sufficient to provide reliable results for September through January. The standard deviation exceeded -3 in September and November, was between -2 and -3 in October and December and between 0 and -1 in January (negative indicates service for CLEC is "better" than for SWBT).



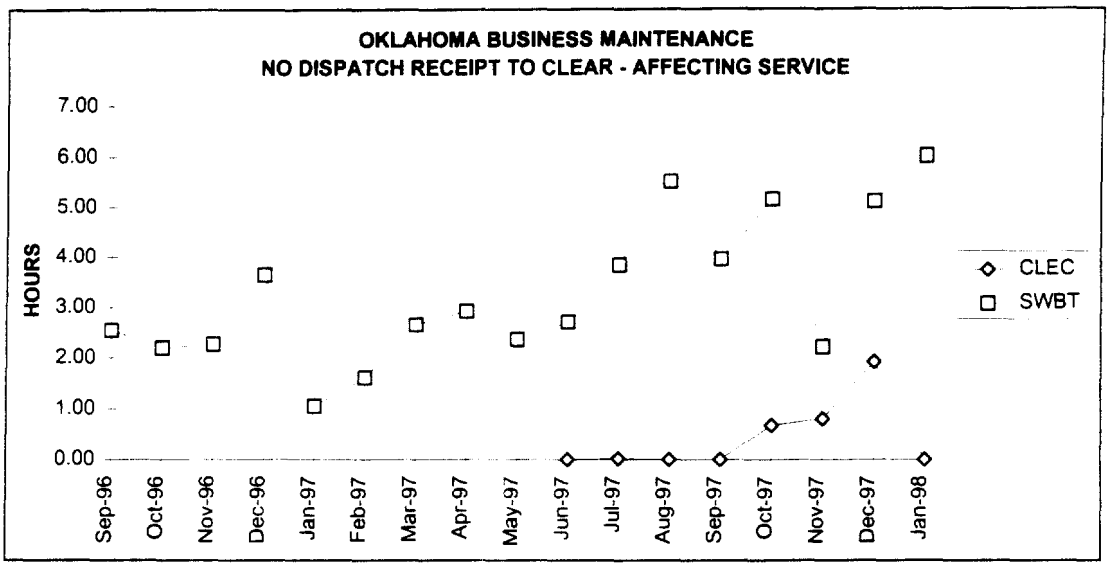
This chart indicates that CLECs experience faster repair times for out of service reports that are not dispatched with the exceptions of September and January.

However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.

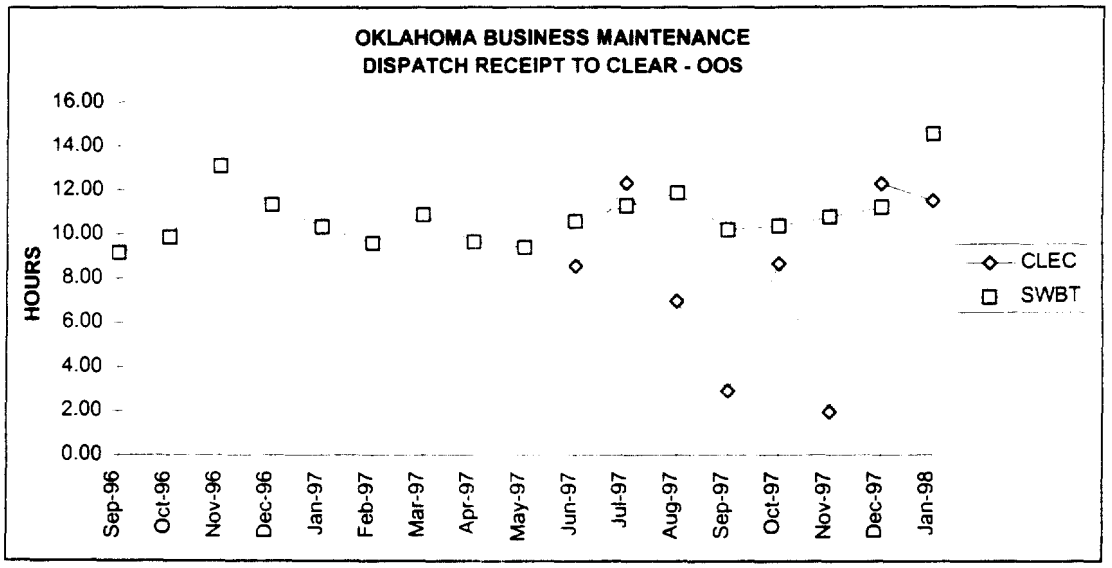
70. The charts below show a comparison between the aggregate CLEC data and SWBT data for business maintenance POTS receipt to clear, broken down by affecting service and out of service for dispatch and no dispatch.



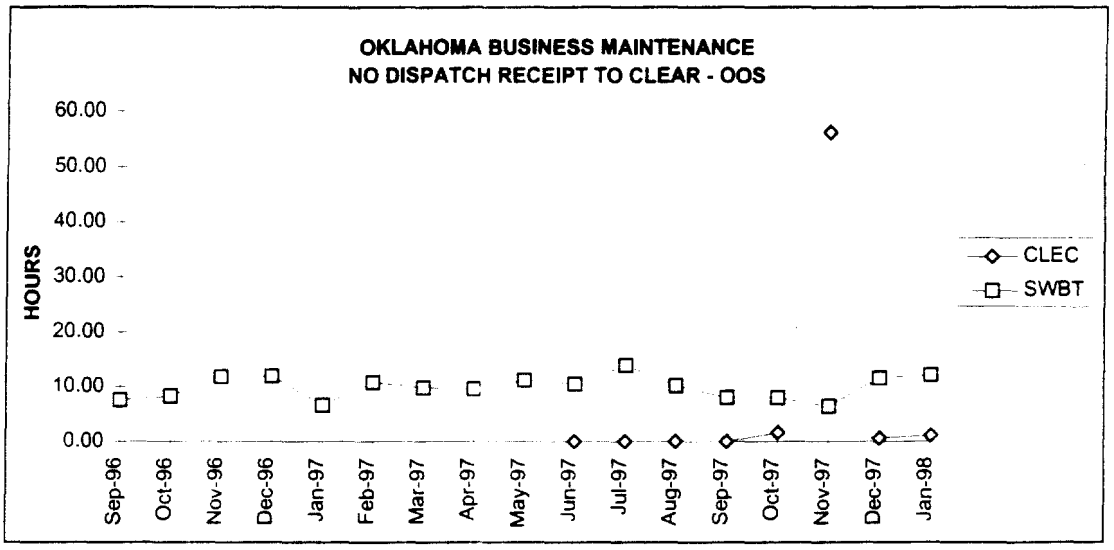
This chart indicates that the CLECs experience faster repair times for business maintenance affecting service that are dispatched with the exception of September than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.



This chart indicates that the CLECs experience faster repair times for business maintenance affecting service that are not dispatched than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.



This chart indicates that the CLECs experience faster repair times for business maintenance out of service that are dispatched with the exceptions of July and December than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.



This chart indicates that the CLECs experience faster repair times for business maintenance out of service that are not dispatched with the exception of November than SWBT. However, the sample is insufficient to provide statistically valid results as defined in ¶ 10.

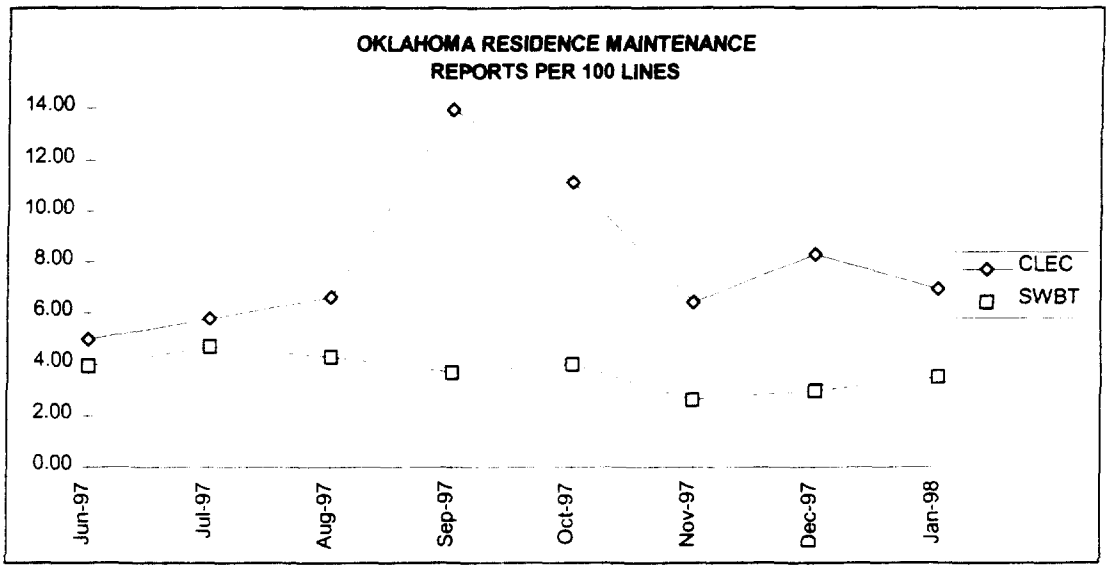
71. **Design Services Mean Time To Restore** measures the average duration of network customer trouble reports from the receipt of the customer trouble report to the time the trouble report is cleared, excluding any time that the service technician was denied access to the customers premise (no access) and the time that the repair was delayed at the customers request (delayed maintenance). This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

72. **UNE Mean Time To Restore** measures the average duration of network customer trouble reports from the receipt of the customer trouble report to the

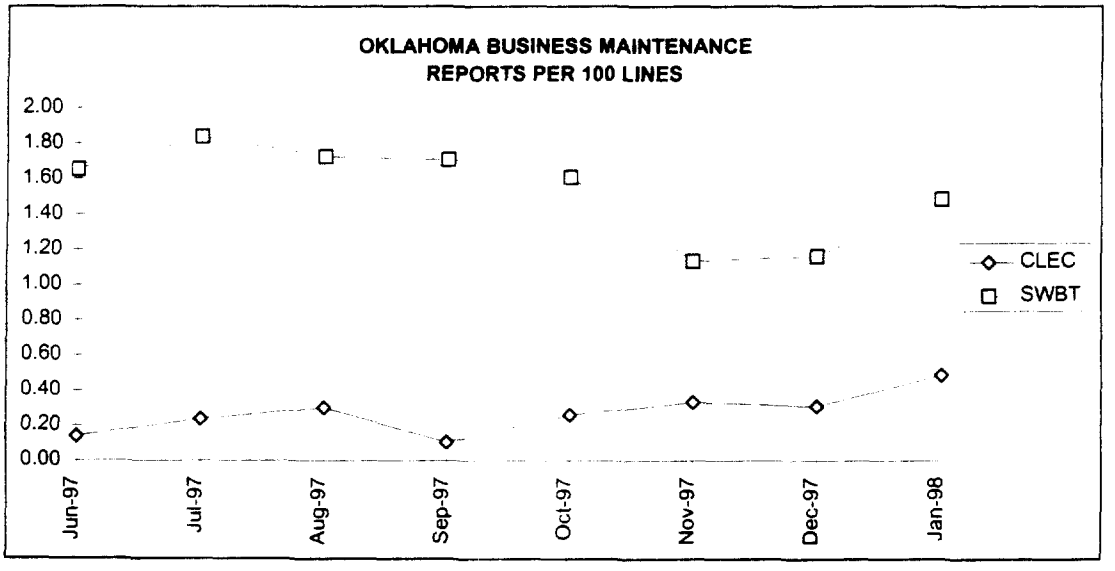
time the trouble report is cleared, excluding no access and delayed maintenance. This measurement is reported for individual CLECs , for all CLECs in the aggregate and for SWBT by loop type [2-Wire Analog 8dB Loop, BRI (2-Wire Digital Loop), and PRI (DS1 Loop)], switch port (Analog, Analog DID, BRI and PRI) and unbundled dedicated transport by dispatch and no dispatch.

73. **POTS Trouble Report Rate** measures the number of customer trouble reports not caused by CPE or inside wiring, CPE and disposition code "13" excludable reports within a calendar month per 100 lines. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT retail service and is only valid for CLECs with line counts of 300,000 or greater in the state.

74. The charts below show a comparison between the aggregate CLEC data and SWBT data for POTS maintenance reports per 100 lines, broken down by residence and business.



The chart indicates that the CLECs experience more reports per 100 lines than SWBT. However, the large disparity between the number of lines in the CLEC sample and those in the SWBT sample could account for the apparent difference.



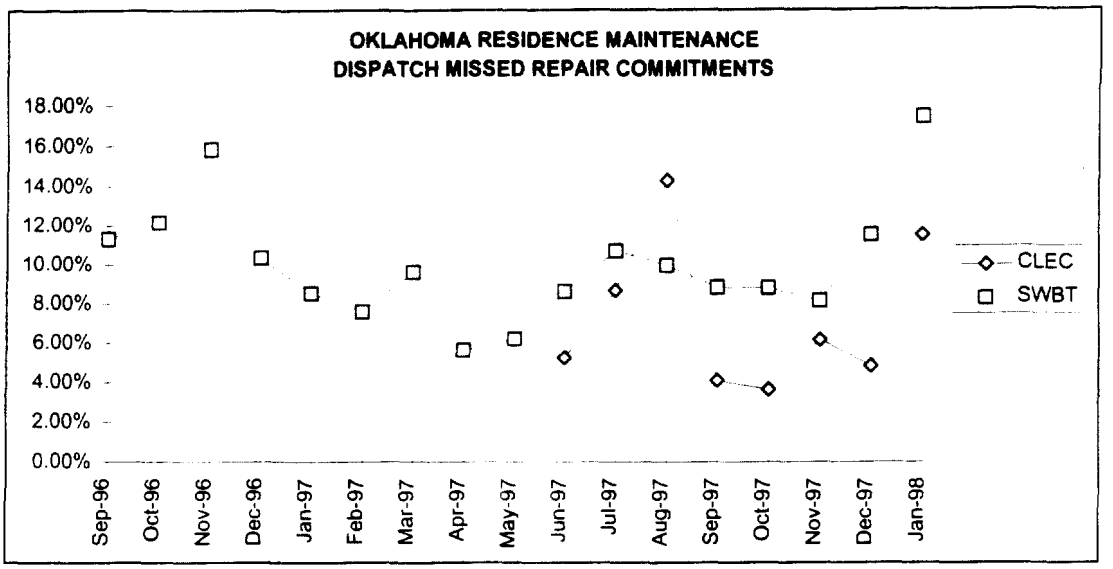
This chart indicates that the CLECs experience a lower report rate for business maintenance than SWBT. However, the disparity in line count between the aggregate of the CLECs and SWBT could account for the difference in report rate.

75. **Design Services Failure Frequency** measures the number of network customer trouble reports within a calendar month per 100 circuits. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT by DDS, DS1, DS3, Voice Grade Private Line (VGPL) and ISDN.

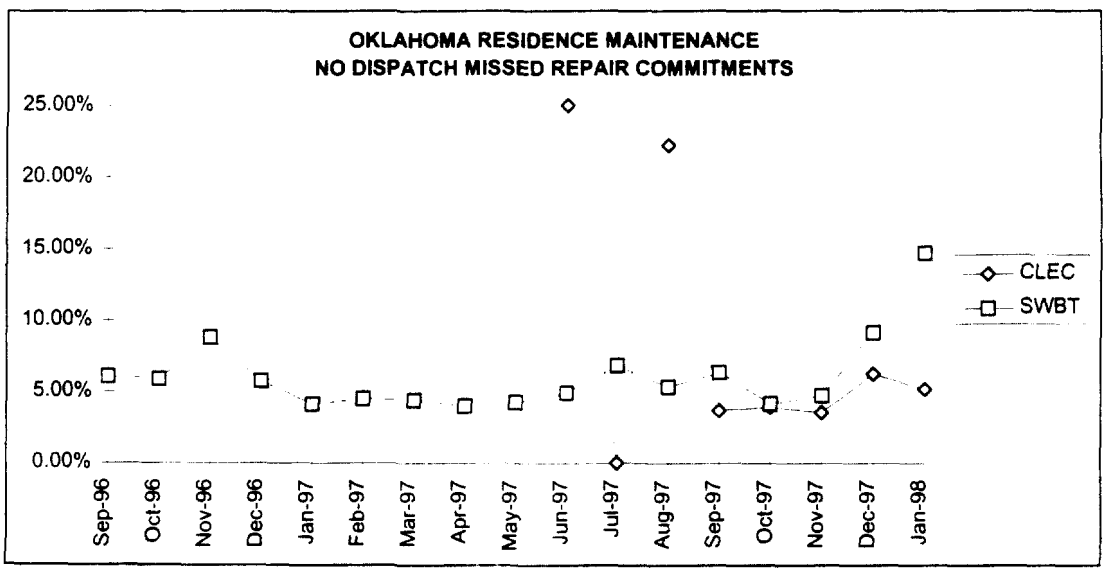
76. **UNE Trouble Report Rate** measures the number of network customer trouble reports within a calendar month per 100 UNEs. This measurement is reported for individual CLECs , for all CLECs in the aggregate and for SWBT by loop type [2-Wire Analog 8dB Loop, BRI (2-Wire Digital Loop), and PRI (DS1 Loop)], switch port (Analog, Analog DID, BRI and PRI) and unbundled dedicated transport.

77. **POTS Percent Missed Repair Commitments** measures the percent of trouble reports not cleared by the commitment time, excluding disposition code "13" excludable reports. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT retail service by dispatch and no dispatch.

78. The charts below show a comparison between the aggregate CLEC data and SWBT data for residence POTS percent missed repair commitments, broken down by dispatch and no dispatch.

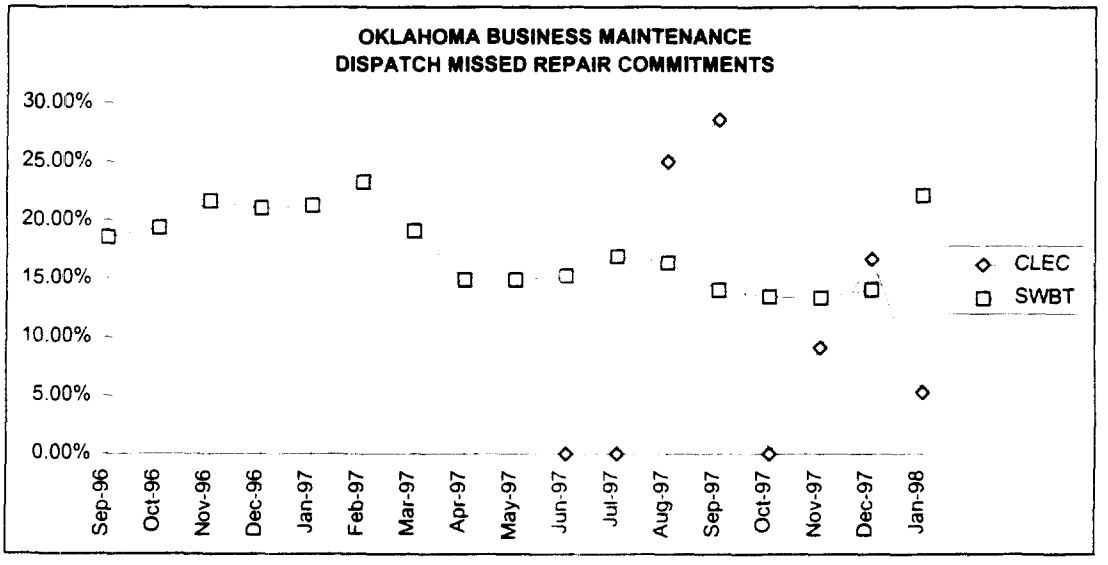


This chart indicates that the CLECs experience a lower residence percent missed repair commitments for dispatched reports than SWBT. The sample is sufficient to provide reliable results for September through December. The standard deviation was between -1 and -3 in September, October, November and January and exceeded -3 in December (negative indicates service for CLEC is "better" than for SWBT).

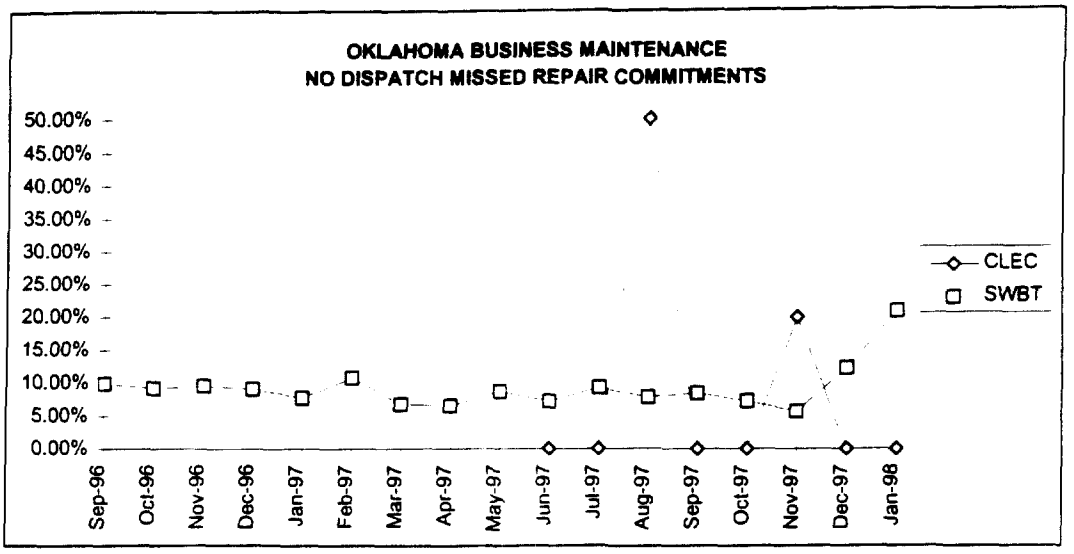


This chart indicates that the CLECs experience a lower residence percent missed repair commitments for reports not dispatched with the exception of June and August than SWBT. The sample is sufficient to provide reliable results for October through December. The standard deviation was between 0 and -1 for October and November and between -1 and -3 in December and January (negative indicates service for CLEC is "better" than for SWBT).

79. The charts below show a comparison between the aggregate CLEC data and SWBT data for business POTS percent missed repair commitments, broken down by dispatch and no dispatch.



There is an insufficient number of business dispatched repair commitments for the aggregate of all CLEC data to obtain a statistically valid comparison for the business percent dispatched missed repair commitments measurement.



There is an insufficient number of business no dispatch repair commitments for the aggregate of all CLEC data to obtain a statistically valid comparison for the business percent no dispatch missed repair commitments measurement.

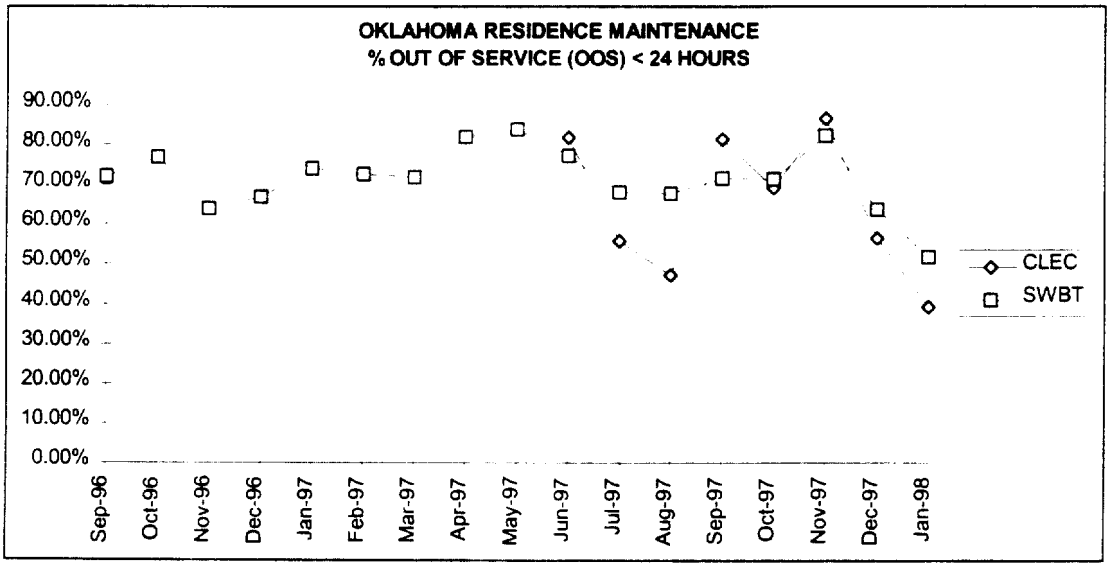
80. **UNE Percent Missed Repair Commitments** ("POTS Like" 2-Wire Analog 8dB Loop) measures the percent of trouble reports not cleared by the commitment time for company reasons. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT with respect to "POTS type" loops (2-Wire Analog 8dB Loop).

81. SWBT does not provide repair commitments for design circuits. Design circuits are given a higher priority than POTS and are prioritized by type of service. Due to the shorter clearing times, this measurement is not required. Therefore for design circuits and UNEs analogous to SWBT design services, percent missed

repair commitments will not be reported. The CLEC will be able to assess non-discriminatory treatment from the mean time to restore (MTTR) measurement.

82. **POTS Percent Out Of Service (OOS) < 24 Hours** measures the percent of OOS trouble reports cleared in less than 24 hours excluding subsequents, tickets received on Saturday or Sunday, no access and all disposition code "13" excludable reports. This measurement is reported for individual CLECs, for all CLECs in the aggregate and for SWBT retail.

83. The charts below show a comparison between the aggregate CLEC data and SWBT data for POTS percent out of service less than 24 hours, broken down by business and residence.



This chart indicates that the CLECs residence percent out of service reports in less than 24 hours fluctuates above and below that of SWBT. This is as a result of small sample sizes even though the sample is large enough in September through

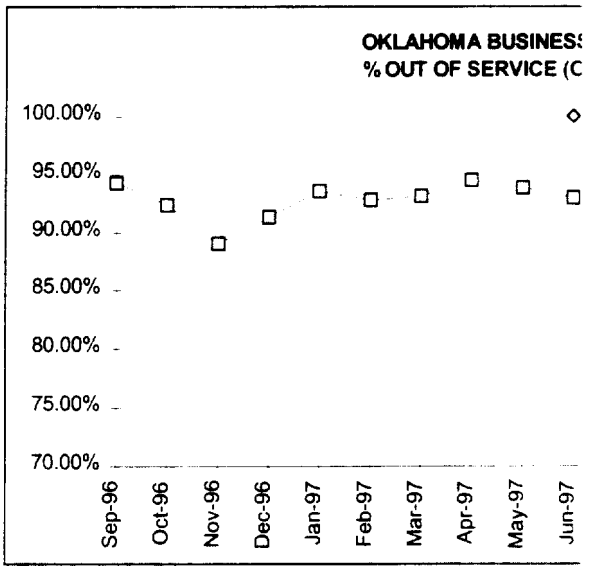
January to provide valid results. The standard

October, between 1 and 3 in September and N

December and exceeded -3 in (positive indicat

for SWBT). As the sample increases the varia

expected to decrease.



There is an insufficient number of business ou

aggregate of all CLEC data to obtain a statistic

service less than 24 hours measurement.

84. **UNE Percent Out Of Service (OOS) < 24 H**

8dB Loop) measures the percent of OOS troub

hours. This measurement is reported for indiv

aggregate and for SWBT by "POTS like" loop