

**BELLSOUTH**

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**EX PARTE OR LATE FILED**

March 10, 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, D.C. 20554

Re: CC Docket No. 97-208, CC Docket No. 97-231,  
CC Docket No. 97-121, CC Docket No. 97-137,  
CC Docket No. 96-98, and RM-9101

Dear Ms. Salas:

This is to inform you that Randy New, Allan Price, Jim Llewellyn, Robert Blau, and the undersigned, all of BellSouth Corporation, and Erwin Krasnow of Verner, Lipfert, Bernhard, McPherson & Hand, met with Commission staff on March 3, 1998. The following Common Carrier Bureau staff members attended some or all of this meeting: Carol Matthey; Michael Pryor; Jonathan Askin; Bill Bailey; Michelle Carey; Greg Cooke; Jke Jennings; David Kirschner; Daniel Shiman; Jeannie Su; and Joe Welch.

During the meeting the participants discussed issues related to the showings required to demonstrate that an applicant has complied with the checklist requirements set forth in Sections 271 (iv), (v), (vi), and (xi) of the Communications Act, as amended. Documents related to these subjects that were filed with you on February 25, 1998, formed the basis for this discussion.

Attachment 1 is a copy of a document prepared in response to an earlier Commission staff request. Representatives of BellSouth explained and gave copies of this document to Commission staff at the meeting.

Because the Commission is considering one or more of the issues discussed at the meeting in each of the proceedings identified above, we are filing notice of this ex parte meeting in each of those proceedings.

As required by Section 1.1206(a)(2) of the Commission's rules, we are filing with the Commission two copies of this notice in each of the proceedings identified above. Please associate this notification with each of those proceedings.

Sincerely,



Kathleen B. Levitz  
Vice President - Federal Regulatory

Attachment

cc:	Jonathan Askin	Bill Bailey	Michelle Carey
	Greg Cooke	Jake Jennings	David Kirschner
	Carol Matthey	Michael Pryor	Daniel Shiman
	Jeannie Su	Joe Welch	

**BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 2:  
NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS**

- BellSouth provides CLECs access to a number of network elements and sub-elements on an unbundled basis, and on standardized terms. Standard offerings include access to local loops, network interface devices, switching capability, interoffice transmission facilities, signaling networks and call-related databases, operations support systems functions, operator services, and directory assistance. Additional details concerning these offerings are given in BellSouth's discussion of other Checklist items.
- Where technically feasible, access to additional UNEs may be obtained through BellSouth's Bona Fide Request Process.
  - BellSouth developed the Bona Fide Request process jointly with AT&T.
  - The process requires BellSouth to acknowledge in writing, within two business days, its receipt of a CLEC request, and further requires BellSouth to identify a single point of contact for that request.
  - BellSouth will provide a preliminary analysis of the request within 30 days of its receipt except in extraordinary circumstances (in which case BellSouth and the CLEC will agree upon a mutually acceptable date).
  - As soon as feasible, but not more than 90 days after it is authorized by the CLEC to proceed with development of a complete proposal, BellSouth will provide its proposal to the requesting CLEC. The proposal will address the following, at a minimum: a description of the network element, availability, applicable rates, and installation intervals.
  - The requesting CLEC has 30 days from receipt of the proposal to notify BellSouth of its acceptance or rejection of the proposal.
- BellSouth does not impose any limitations, restrictions, or requirements on requests for or use of a UNE that would impair a CLEC's ability to provide a telecommunications service in the manner it intends.
- CLECs obtain exclusive use of an unbundled network facility and may use features, functions, or capabilities for a set period of time.
- BellSouth retains the obligation to maintain, repair, or replace UNEs.
- BellSouth permits any CLEC to recombine UNEs on an end-to-end (or any other) basis.

- In satisfaction of 47 U.S.C. §§ 251(c)(3) and (c)(6), BellSouth provides CLECs that so desire with physical or, at the CLEC's option, virtual collocation for the purpose of combining UNEs. Collocation arrangements are discussed in greater detail in BellSouth's discussion of Checklist Item 1.
- BellSouth has established comprehensive performance measurements to facilitate verification that BellSouth is providing nondiscriminatory access to UNEs.
  - BellSouth is legally bound, through its interconnection agreements, statements of generally available terms and conditions, and state commission orders, to provide performance measurements.
  - As described in Attachment 1 hereto, BellSouth has developed a comprehensive set of measurements covering pre-ordering, ordering and provisioning, maintenance and repair, and billing of interconnection, UNEs, and resold services, among other functions.
  - In addition to creating performance measurement reports based on the extensive data it collects, BellSouth provides CLECs direct access to the data used to generate these reports, thereby enabling CLECs to obtain specific results without intervention by BellSouth. BellSouth will maintain performance data for a two-year period from the time when reports are initially produced.
- BellSouth provides nondiscriminatory access to OSS functions for pre-ordering, ordering and provisioning, maintenance and repair, and billing of interconnection, resold retail services, and UNEs. BellSouth's OSS interfaces are operated and made available to CLECs on a region-wide basis.

#### Pre-ordering

- There currently is no industry-standard pre-ordering interface. However, BellSouth is committed to implementing whatever pre-ordering standards the industry develops.
- BellSouth provides CLECs with real-time access to the same pre-ordering databases used by BellSouth's retail representatives through either the Local Exchange Navigation System ("LENS"), the Common Gateway Interface ("CGI"), or EC-Lite. Each of these interfaces provides CLECs with access to pre-ordering information in substantially the same time and manner as BellSouth's own retail representatives.

- LENS and EC-Lite are superior to BellSouth's retail systems in that they provide a single interface for both residential and business customers throughout all BellSouth states.
- EC-Lite, which was developed at AT&T's request, has been fully tested and has been available to CLECs since December 30, 1997. EC-Lite allows CLECs to perform pre-ordering and ordering functions using their own OSSs.
- CLECs may integrate LENS data into their own internal systems using CGI, which allows CLECs to obtain and manipulate the LENS data electronically. BellSouth's CGI interface was updated on December 15, 1997 and the updated interface has been provided to all requesting CLECs.

#### Ordering and Provisioning

- EDI, the primary ordering interface offered to CLECs, has been available since December 1996.
  - The EDI interface conforms to the national standards for local exchange ordering established by the Ordering and Billing Forum subcommittee of the Telecommunications Industry Association. BellSouth is implementing Version 7.0 of the EDI standard in March 1998.
  - EDI currently supports electronic ordering for services that represent 80 % of BellSouth's total retail operating revenue, including 34 resale services and some unbundled network elements, including unbundled loops, ports and interim number portability.
  - Several complex services may be ordered using EDI. The specialized nature and low volume of these complex services necessitates substantial manual handling, however. Orders for such services are processed in substantially the same manner for CLECs as for BellSouth's own retail customers.
  - BellSouth also has developed PC-based EDI software, allowing even the smallest CLEC to use EDI. Four CLECs are using this interface, which is known as EDI-PC.
  - Seven CLECs currently are using EDI.

- CLECs also may order infrastructure-type elements such as interconnection trunking using Exchange Access Control and Tracking System ("EXACT").
- LENS and CGI also may be used to order a subset of resold services. Forty-four CLECs currently use LENS for ordering.
- Orders for UNEs that constitute an existing retail service are treated as resale orders.
- All CLECs utilizing BellSouth's OSS interfaces have been provided with a complete set of the business rules used by BellSouth in processing their orders. These rules include (1) rules governing the Local Exchange Ordering Implementation Guide, (2) rules governing the Local Exchange Ordering database ("LEO"), which checks orders for completeness, and (3) rules governing the Local Exchange Service Order Generator ("LESOG") and the Service Order Edit Routine ("SOER") of BellSouth's Service Order Control System ("SOCS"), which check for data validity (including checks against pre-ordering databases for valid addresses, proper reservation of telephone numbers, availability of the ordered feature in a specific central office, and valid combinations of services and features).
- CLECs may integrate ordering and pre-ordering functions using their own interface (such as EC-Lite, which was developed initially by AT&T); by integrating pre-ordering information from LENS with the ordering functions of EDI; or by using LENS for both pre-ordering and ordering.
- Fully mechanized order generation is currently available for 34 resale services. These services represent approximately 90% of BellSouth's consumer and small business revenues. All aspects of order generation — including firm order confirmations and completion notices — are fully mechanized for these services.
  - In January 1998, approximately 63.7 % of CLEC orders for these services and selected UNEs flowed-through EDI AND LENS without human intervention. After correcting for CLEC-caused errors, approximately 90.5 % of CLEC orders flowed-through.
  - BellSouth has developed a mechanism to provide CLECs electronic notification of order errors. BellSouth has created a standard set of electronic error messages which will be returned to the CLECs via EDI, LENS, or CGI. These errors will allow the CLECs to recognize and correct any errors in their orders and resubmit them.

- A subset of this service has been tested with MCI and has been available to all CLECs since November 1997. The full-blown expanded service providing electronic notification of order errors will be available to all CLECs as of March 16, 1998.
- BellSouth's electronic interfaces for ordering and provisioning produce firm order confirmations ("FOCs") for CLECs in substantially the same time and manner as they are produced for BellSouth.
  - A FOC is produced and returned electronically for correct orders submitted electronically.
  - Of CLEC EDI orders submitted correctly in January 1998 in BellSouth's region, 84% resulted in FOCs in less than 4 hours, and 92% resulted in FOCs in less than 24 hours. For all the January EDI orders which required manual handling, 83% resulted in FOCs in less than 24 hours.
- Order status notifications for CLECs (including jeopardy notifications) are delivered to CLECs in substantially the same time and manner as they are produced for BellSouth.
  - Service jeopardy notifications are delivered via a printed (faxed) document, in substantially the same time and manner as they are delivered to BellSouth's own retail operations.
- At AT&T's request, BellSouth also has developed a system that notifies local exchange carriers when they have lost a customer.
- The current combined capacity for LENS and EDI is more than 10,000 orders per day, about 400% greater than the peak daily ordering volume experienced by BellSouth to date.

#### Maintenance and Repair

- BellSouth offers CLECs access to the Trouble Analysis and Facilitation Interface ("TAFI"), the same maintenance and trouble repair system used by BellSouth's own retail representatives.
  - Repair attendants may use TAFI to clear troubles remotely while the customer is still on the line.
  - 25 CLECs have used TAFI to enter trouble reports.

- The TAFI interface can support 130 simultaneous users and 2600 trouble reports per hour for the BellSouth region. This far exceeds actual CLEC usage; 21 CLECs generated a total of 5252 trouble reports between June and December 1997.
- BellSouth's machine-to-machine local exchange trouble reporting interface — the Electronic Communication Trouble Administration Gateway — conforms to the T1/M1 standard for local exchange trouble reporting and notification. This interface provides access to the BellSouth maintenance OSS supporting both telephone-numbered and circuit-identified services, and supports both resold services and UNEs. BellSouth completed testing of this application-to-application gateway in November 1997 and is ready to deploy it with any interested CLEC.
- BellSouth also offers CLECs access to the same T1/M1 industry standard trouble reporting interface used by interexchange carriers to report troubles with access services.

### Billing

- BellSouth provides CLECs with access to billable usage information in substantially the same time and manner as BellSouth's retail customers.
  - Generally, services ordered from BellSouth's General Subscriber Lines Tariff and Private Line Services Tariff are billed using CRIS while services order from the Access Services Tariff are billed using CABS.
  - Pursuant to the negotiation and arbitration process, BellSouth has agreed to provide some CLECs with CABS-formatted bills for services that would normally be billed using CRIS. BellSouth has provided CRIS bills and CABS-formatted CRIS bills since August 1997.
  - BellSouth provides CLECs with an optional interface — the Billing Daily Usage File — detailing daily use of all usage-based services. The bill records are provided in the industry-defined Exchange Message Record format.
    - The Daily Usage Files may be transferred to the CLEC electronically or via magnetic tape.
    - Nineteen CLECs currently receive daily usage files ad more than 41 million CLEC billable usage records have been processed.

**Notice of System Updates**

- BellSouth provides CLECs with advance notification and documentation of all proposed system changes.
- BellSouth also provides CLECs with training on all OSS interfaces and extensive documentation of these interfaces.

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**PRE-ORDERING (PO)**

<b>Function:</b>	<b>Average Response Interval for Pre-Ordering Information &amp; OSS Interface Availability</b>
<b>Measurement Overview:</b>	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.
<b>Measurement Methodology:</b>	<p><b>1. Average Response Interval = <math>\sum [ (\text{Query Response Date \&amp; Time}) - (\text{Query Submission Date \&amp; Time}) ] / (\text{Number of Queries Submitted in Reporting Period})</math></b></p> <p>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.</p> <p><b>Objective:</b></p> <p>Average response time per transaction for a query for appointment scheduling, service &amp; 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.</p> <p><b>2. OSS Interface Availability = <math>(\text{Actual Availability}) / (\text{Scheduled Availability}) \times 100</math></b></p> <p><b>Objective:</b></p> <p>Percent of times OSS interface is <u>actually</u> available compared to <u>scheduled</u> availability.</p>

**Service Quality Measurements  
Measurement Detail**

01/27/98

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<b>Reporting Dimensions:</b>	<b>Excluded Situations:</b>
<ul style="list-style-type: none"> <li>• Not carrier specific.</li> <li>• Not product/service specific.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Data Retained Relating to CLEC Experience:</b>	<b>Data Retained Relating to BST Performance:</b>
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Query Type (per reporting dimension)</li> <li>• Response interval</li> <li>• Regional Scope</li> </ul>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Query Type (per reporting dimension)</li> <li>• Response interval</li> <li>• Regional Scope</li> </ul>

**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

Service Quality Measurements  
Measurement Detail

01/27/98

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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**

<b>Function:</b>	<b>Ordering</b>
<b>Measurement Overview:</b>	<p>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.</p>
<b>Measurement Methodology:</b>	<p><b>1. Firm Order Confirmation Timeliness = <math>\sum [ (\text{Date and Time of Firm Order Confirmation}) - (\text{Date and Time of Service Request Acknowledgment}) ] / (\text{Number of Service Requests Confirmed in Reporting Period})</math></b></p> <p><b>Objective:</b> <u>Interval for Return of a Firm Order Confirmation (FOC Interval)</u> is the average response time from receipt of valid service order request to distribution of order confirmation.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Non-Mechanized Results are based on a 100% sample</li> <li>• Mechanized Results are based on actual data for all orders from the OSS</li> </ul> <p><b>2. Reject Interval = <math>\sum [ (\text{Date and Time of Service Request Rejection}) - (\text{Date and Time of Service Request Acknowledgment}) ] / (\text{Number of Service Requests Rejected in Reporting Period})</math></b></p> <p><b>Objective:</b> <u>Reject Interval</u> is the average reject time from receipt of service order request to distribution of rejection.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Non-Mechanized Results are based on a 100% sample</li> <li>• Mechanized Results are based on actual data for all orders from the OSS</li> </ul> <p><b>3. Percent Rejected Service Requests = <math>\sum (\text{Total Number of Rejected Service Requests}) / (\text{Total Number of Service Requests Received}) \times 100</math>.</b></p> <p><b>Objective:</b> <u>Percent Rejected Service Requests</u> is the percent of total orders received rejected due to error or omissions.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Manual tracking for non flow-through service requests</li> <li>• Mechanized tracking for flow-through service requests</li> </ul>

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**4. Percent Flow-through Service Requests =  $\sum$  (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 =  $(\sum \text{Date \& Time CLEC Service Requests placed in queue for completion}) - (\sum \text{Date \& Time CLEC Service Requests first reaches BST Interface}) / \text{Total Number of Service Requests}$**

**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 =  $\sum$  (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 =  $\sum$  (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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<b>Reporting Dimensions:</b>	<b>Excluded Situations:</b>
<ul style="list-style-type: none"> <li>• See Appendix A, item 1</li> <li>• See Appendix A, item 4</li> </ul>	<ul style="list-style-type: none"> <li>• Firm Order Confirmation Interval - Invalid Service Requests</li> <li>• Rejection Interval</li> <li>• Percent Rejected Service Requests - None</li> <li>• Percent Flow-through Service Requests - Rejected Service Requests</li> <li>• Service Requests canceled by the CLEC</li> <li>• Service Request Activities of BST associated with internal or administrative use of local services.</li> </ul>
<b>Data Retained Relating to CLEC Experience:</b>	<b>Data Retained Relating to BST Performance:</b>
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Interval for FOC</li> <li>• Reject Interval</li> <li>• Total number of LSRs</li> <li>• Total number of Errors</li> <li>• Adjusted Error Volume</li> <li>• Total number of flow through service requests</li> <li>• Adjusted number of flow through service requests</li> <li>• Geographic Scope</li> </ul>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Interval for FOC</li> <li>• Reject Interval</li> <li>• Total number of LSRs</li> <li>• Total number of Errors</li> <li>• Adjusted Error Volume</li> <li>• Total number of flow through service requests</li> <li>• Adjusted number of flow through service requests</li> <li>• Geographic Scope</li> </ul>

**Firm Order Confirmation Timeliness**

	% < 10 days	Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
		< 5 cmts	>= 5 cmts	< 5 cmts	>= 5 cmts	< 10 cmts	>= 10 cmts	< 10 cmts	>= 10 cmts
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**

	% < 10 days	Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
		< 5 cmts	>= 5 cmts	< 5 cmts	>= 5 cmts	< 10 cmts	>= 10 cmts	< 10 cmts	>= 10 cmts
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**

	%<10 days	Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
		<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**

	%<10 days	Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
		<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**

	%<10 days	Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
		<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**

	%<10 days	Mechanized		Non-Mechanized		Mechanized		Non-Mechanized	
		<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**

<b>Function:</b>	<b>Order Completion Intervals</b>
<b>Measurement Overview:</b>	<p>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.</p>
<b>Measurement Methodology:</b>	<p><b>1. Average Completion Interval = <math>\sum [ (\text{Completion Date \&amp; Time}) - (\text{Order Submission Date \&amp; Time}) ] / (\text{Count of Orders Completed in Reporting Period})</math></b></p> <p><b>2. Order Completion Interval Distribution = <math>\sum (\text{Service Orders Completed in "X" days}) / (\text{Total Service Orders Completed in Reporting Period}) \times 100</math></b></p> <p>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.</p> <p>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.</p> <p><b>Objective:</b> Average time from receipt of (confirmed) service request to actual order completion date. Excludes orders where customer requested dates are beyond offered interval.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Mechanized metric from ordering system</li> <li>• If mechanical not available, a (BST &amp; CLEC) statistically validated sample should be used.</li> </ul>

**Service Quality Measurements  
Measurement Detail**

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<b>Reporting Dimensions:</b>	<b>Excluded Situations:</b>
<ul style="list-style-type: none"> <li>• See Appendix A, item 2</li> <li>• See Appendix A, item 4</li> </ul>	<ul style="list-style-type: none"> <li>• Orders where customer requested dates are beyond offered interval</li> </ul>
<b>Data Retained Relating to CLEC Experience:</b>	<b>Data Retained Relating to BST Performance:</b>
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• CLEC Order Number</li> <li>• Order Submission Date</li> <li>• Order Submission Time</li> <li>• Order Completion Date</li> <li>• Order Completion Time</li> <li>• Service Type</li> <li>• Activity Type</li> <li>• Geographic Scope</li> </ul>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Average Order Completion Interval</li> <li>• Order Completion by Interval</li> <li>• Service Type</li> <li>• Activity Type</li> <li>• Geographic Scope</li> </ul>

**Order Completion Interval Distribution**

**Average Completion Interval**

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

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

<b>TRUNKS</b>	<b>5 Days</b>	<b>10</b>	<b>15</b>	<b>20</b>	<b>25</b>	<b>30</b>	<b>&gt;30</b>	<b>Total</b>	<b>Ave. Completion Interval</b>
<b>Dispatch % &lt; 10 days</b>	x	x	x	x	x	x	x	x	x
<b>No Dispatch % &lt; 10 days</b>	x	x	x	x	x	x	x	x	x

Service Quality Measurements  
Measurement Detail

01/27/98

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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**

<b>Function:</b>	<b>Held Orders</b>
<b>Measurement Overview:</b>	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.
<b>Measurement Methodology:</b>	<p>1. <b>Mean Held Order Interval</b> = <math>\sum (\text{Reporting Period Close Date} - \text{Committed Order Due Date}) / (\text{Number of Orders Pending and Past The Committed Due Date})</math> for all orders pending and past the committed due date.</p> <p>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.</p> <p><b>(# of Orders Held for <math>\geq 90</math> days) / (Total # of Orders Pending But Not Completed) X 100.</b></p> <p><b>(# of Orders Held for <math>\geq 15</math> days) / (Total # of Orders Pending But Not Completed) X 100.</b></p> <p>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.</p> <p><b>Objective:</b> Average time to detect orders continuing in a "non-complete" state for extended period of time.</p>

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<b>Reporting Dimensions:</b>	<b>Excluded Situations:</b>
<ul style="list-style-type: none"> <li>• See Appendix A, item 2</li> <li>• See Appendix A, item 4</li> </ul>	<ul style="list-style-type: none"> <li>• Any order canceled by the CLEC will be excluded from this measurement.</li> <li>• Orders held for CLEC end user reasons</li> <li>• Orders held for BST end user reasons</li> <li>• Order Activities of BST associated with internal or administrative use of local services.</li> </ul>
<b>Data Retained Relating to CLEC Experience:</b>	<b>Data Retained Relating to BST Performance:</b>
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• CLEC Order Number</li> <li>• Order Submission Date</li> <li>• Committed Due Date</li> <li>• Service Type</li> <li>• Hold Reason</li> <li>• Geographic Scope</li> </ul>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• Average Held Order Interval</li> <li>• Standard Error for the Average Held Order Interval</li> <li>• Service Type</li> <li>• Hold Reason</li> <li>• Geographic Scope</li> </ul>

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**

<b>Function:</b>	<b>Installation Timeliness, Quality &amp; Accuracy</b>
<b>Measurement Overview:</b>	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.
<b>Measurement Methodology:</b>	<p><b>1. Percent Missed Installation Appointments = <math>\sum (\text{Number of Orders missed in Reporting Period}) / (\text{Number of Orders Completed in Reporting Period}) \times 100</math></b></p> <p>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.</p> <p><b>Objective:</b> 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.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Mechanized metric from ordering system</li> </ul> <p><b>2. % Provisioning Troubles within 30 days of Installation = <math>\sum (\text{All Troubles on Services installed } \leq 30 \text{ days in a calendar month}) / (\text{All Installations in same calendar month}) \times 100</math></b></p> <p><b>Objective:</b> Measures the quality of completed orders</p> <p><b>Methodology:</b> Mechanized metric from ordering system</p> <p><b>3. Percent Order Accuracy = <math>(\sum \text{Orders Completed w/o error}) / (\sum \text{Orders Completed}) \times 100</math>.</b></p> <p><b>Objective:</b> Measures the accuracy and completeness of BST provisioning or disconnecting service by comparing what was ordered and what was completed.</p> <p><b>Methodology:</b></p> <ul style="list-style-type: none"> <li>• Non-Mechanized Results are based on an audit of a statistically valid sample</li> <li>• Mechanized Results are based on an audit of a statistically valid sample</li> </ul>

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<b>Reporting Dimensions:</b>	<b>Excluded Situations:</b>
<ul style="list-style-type: none"> <li>• See Appendix A, item 2</li> <li>• See Appendix A, item 4</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Data Retained Relating to CLEC Experience:</b>	<b>Data Retained Relating to BST Performance:</b>
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• CLEC Order Number</li> <li>• Order Submission Date</li> <li>• Order Submission Time</li> <li>• Status Type</li> <li>• Status Notice Date</li> <li>• Status Notice Time</li> <li>• Standard Order Activity</li> <li>• Geographic Scope</li> </ul>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• BST Order Number</li> <li>• Order Submission Date</li> <li>• Order Submission Time</li> <li>• Status Type</li> <li>• Status Notice Date</li> <li>• Status Notice Time</li> <li>• Standard Order Activity</li> <li>• Geographic Scope</li> </ul>

**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)**

<b>Function:</b>	<b>Customer Trouble Report Rate</b>
<b>Measurement Overview:</b>	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.
<b>Measurement Methodology:</b>	<p>1. <b>Customer Trouble Report Rate = (Count of Initial &amp; Repeated Trouble Reports in the Current Period) / (Number of Service Access Lines in Service at End of the Report Period) X 100.</b> <i>Note: Local Interconnection Trunks are reported only as total troubles. No meaningful count of lines in service exists.</i></p> <p>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.</p> <p><b>Objective:</b> 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.</p> <p><b>Methodology:</b> Mechanized metric trouble reports and lines in service captured in maintenance database(s).</p>

<b>Reporting Dimensions:</b>	<b>Excluded Situations:</b>
<ul style="list-style-type: none"> <li>• See Appendix A, item 3</li> <li>• See Appendix A, item 4</li> </ul>	<ul style="list-style-type: none"> <li>• Trouble tickets canceled at the CLEC request</li> <li>• BST trouble reports associated with administrative service</li> <li>• Instances where the CLEC or BST customer requests a ticket be "held open" for monitoring</li> </ul>
<b>Data Retained Relating to CLEC Experience:</b>	<b>Data Retained Relating to BST Performance:</b>
<ul style="list-style-type: none"> <li>• Report Month</li> <li>• CLEC Ticket Number</li> <li>• Ticket Submission Date</li> <li>• Ticket Submission Time</li> <li>• Ticket Completion Time</li> <li>• Ticket Completion Date</li> <li>• Service Type</li> <li>• WTN or CKTID (a unique identifier for elements combined in a service configuration)</li> <li>• Disposition and Cause</li> <li>• Geographic Scope</li> </ul>	<ul style="list-style-type: none"> <li>• Report Month</li> <li>• BST Ticket Number</li> <li>• Ticket Submission Date</li> <li>• Ticket Submission Time</li> <li>• Ticket Completion Time</li> <li>• Ticket Completion Date</li> <li>• Service Type</li> <li>• WTN or CKTID (a unique identifier for elements combined in a service configuration)</li> <li>• Disposition and Cause</li> <li>• Geographic Scope</li> </ul>