BELLSOUTH

EX PARTE OR LATE FILED

Kathleen B. Levitz
Vice President-Federal Regulatory

Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351
202 463-4113
Fax: 202 463-4198
Internet: levitz.kathleen@bsc.bls.com

April 30, 1998

RECEIVED
APR 30 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

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

Re: Written Ex Parte in:
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 CC Docket No. 98-56

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has sent a written ex parte communication to Ms. Carol Mattey, Chief of the Common Carrier Bureau's Policy and Program Planning Division. That communication presents revised proffers of evidence of compliance with the requirements of Sections 271 (c)(2)(B)(ii) and (xiv) of the Communications Act of 1934, as amended. It is filed as part of the ongoing Section 271 collaborative process undertaken by the Bureau staff and BellSouth.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the above-referenced proceedings.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz
Vice President-Federal Regulatory

Attachment

cc: Carol Mattey
Joe Welch

No. of Copies rec'd 0+3
List ABCDE

BELLSOUTH

Kathleen B. Levitz
Vice President-Federal Regulatory

Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351
202 463-4113
Fax: 202 463-4198
Internet: levitz.kathleen@bsc.bls.com

April 30, 1998

Ms. Carol Mattey, Chief
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Written Ex Parte in CC Docket No. 97-208, CC Docket No. 97-231, CC Docket No. 97-124, CC Docket No. 97-137, CC Docket No. 96-98, and CC Docket No. 98-56

Dear Ms. Mattey:

Over the past several weeks representatives of BellSouth have met regularly with your staff to discuss the showings that must be made to receive Commission approval of a Section 271 application. To facilitate those discussions, BellSouth had filed proffers describing the evidence it would offer to show compliance with each of the fourteen checklist items appearing in Section 271 (c)(2)(B) of the Communications Act of 1934, as amended. As the discussions progressed, BellSouth amended its initial proffers for specific checklist items to reflect the insights we had received from our meetings with the staff. BellSouth has shared each of those revised proffers with the staff and filed them with the Commission's Secretary in order to make them part of the record in the relevant proceedings listed above. Today we file revised proffers of evidence to show BellSouth's compliance with Checklist items ## 2 and 14.

If after reviewing the revised proffers, your staff concludes that it needs additional or different information related to these topics, please call me at (202) 463-4113.

In compliance with Section 1.1206(a)(1) of the Commission's rules, we have today filed with the Secretary of the Commission two copies of this

written ex parte presentation in each of the proceedings listed above and requested that it be associated with each of those proceedings.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz
Vice President - Federal Regulatory

Attachment

Attachment 1

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 ("NIDs") (which state commissions have ruled are part of the unbundled loop), switching capability, interoffice transmission facilities, signaling networks and call-related databases, operations support systems functions, operator services, and directory assistance. Details concerning these offerings are given in BellSouth's discussion of other Checklist items.

  - *CLECs have requested and BellSouth has furnished each of these standard offerings (including NIDs as part of loop/NID combinations).*

- *The state commissions of Georgia, Kentucky, and Louisiana have completed pricing proceedings for all UNEs specifically required by the FCC. The Florida commission has established "final" rates for most of the mandatory elements and completed hearings on the remainder. The UNE rates set by the Alabama, Mississippi, North Carolina, South Carolina, and Tennessee commissions are subject to further proceedings. Hearings have been concluded in each of these states. In each of these states, BellSouth has filed forward-looking cost studies.*

- 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.

- *One method by which a CLEC may recombine UNEs is through the use of collocation arrangements. Both physical collocation arrangements and virtual collocation arrangements may be used by CLECs to accomplish such recombination.*

- *BellSouth will wire each UNE to the cable and pair designated by the CLEC on the UNE order. For example, both the loop and the switch port are terminated on the Main Distribution Frame (MDF) within the BellSouth central office. Upon request of the CLEC, BellSouth will wire the loop to the cable and pair facility designated on the unbundled loop order. Likewise, BellSouth will also wire the unbundled switch port to the cable and pair designated on the unbundled switch port order.*

- *In the case of physical collocation, BellSouth's wiring of the UNEs to the cable and pair interconnection facilities designated by the CLEC correlates to the pre-designated positions on the Point Of Termination (POT) bay serving the collocation arrangement. The CLEC may complete the combination via connections within its collocation arrangement either manually or electronically, at the election of the CLEC.*

- *To facilitate UNE combinations using virtual collocation, the CLEC may employ any of several options. These options may include, but are not limited to: pre-wired terminations on the CLEC's transmission equipment, use of the CLEC's electronic digital cross-connection facilities or other means of performing cross-connections remotely, or connections on a per request basis. An example of using pre-wired terminations might include the CLEC's arranging the pre-wiring of "position 100" to "position 200," "position 101" to "position 201" and so forth. Should the CLEC wish to combine the*

two elements, such as the combining of an unbundled loop with an unbundled switch port, the CLEC would specify the BellSouth cable and pair assignment correlating to "position 100" on the unbundled loop order and would specify the BellSouth cable and pair assignment correlating to "position 200" on the unbundled switch port order. With "position 100" and "position 200" having been pre-connected, the UNEs would thus be combined once BellSouth completes its connection of each of the UNEs ordered to the designated interconnection facility cable and pair assignments.

- 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.

  <u>Pre-ordering</u>

  - 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 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 specifications were updated on December 15, 1997 and again on April 8, 1998. 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 implemented Version 7.0 of the EDI standard in March 1998.

  - EDI currently supports electronic ordering for services that represent 80 percent of BellSouth's total retail operating revenue, including 34 resale services, four of which are complex services, and some unbundled network elements, including unbundled loops, ports and interim number portability.

  - Four 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 rules governing: (1) the Local Exchange Ordering Implementation Guide; (2) the Local Exchange Ordering database ("LEO"), which checks orders for completeness; and (3) 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 for 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 30 resale services and 4 UNEs (unbundled loops, unbundled ports, interim number portability, and unbundled loops plus interim number portability).* These services represent approximately 90 percent 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 percent 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 percent 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 are 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 was tested with MCI and has been available to all CLECs since November 1997. The full, expanded service providing electronic notification of order errors *became* available to all CLECs on March 16, 1998.

- BellSouth's electronic interfaces for ordering and provisioning produce firm order confirmations ("FOCs") for CLECs. *BellSouth does not have a corresponding process for its retail operations.*

  - 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 percent resulted in FOCs in less than 4 hours, and 92 percent resulted in FOCs in less than 24 hours. For all the January EDI orders that required manual handling, 83 percent 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 percent 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 and more than 41 million CLEC billable usage records have been processed.

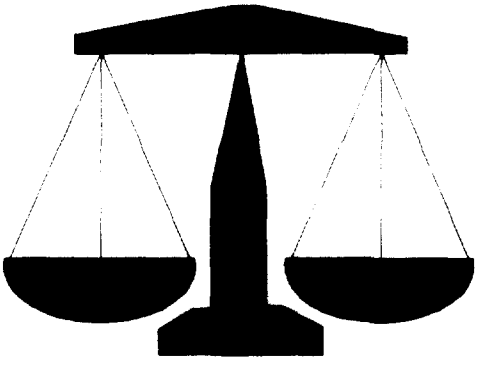
Notice of System Updates

- 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.

BELLSOUTH®

Service Quality Measurements



BST/CLEC Regional Performance Reports

BELLSOUTH®

Service Quality Measurements

INDEX

- Service Quality Measurements-Reference Documentation.
- Pre-Ordering and Ordering OSS
- Ordering
- Provisioning
- Maintenance and Repair
- Billing
- Operator Services (Toll) and Directory Assistance
- E911
- Local Interconnection Trunk Group Blockage

TABLE OF CONTENTS

CATEGORY	FUNCTION	PAGE #
Pre-Ordering and Ordering OSS	1. Average OSS Response Interval	2
	2. OSS Interface Availability	2
Ordering	1. Firm Order Confirmation Timeliness	5
	2. Reject Interval	5
	3. Percent Rejected Service Requests	5
	4. Percent Flow-through Service Requests	6
	5. Total Service Request Cycle Time	6
	6. Service Request Submissions per Request	6
	7. Speed of Answer in Ordering Center	6
Provisioning	1. Average Completion Interval	10
	2. Order Completion Interval Distribution	10
	3. Held Order Interval Distribution and Mean Interval	13
	4. Percent Missed Installation Appointments	15
	5. Percent Provisioning Troubles w/i 30 days	15
	6. Percent Order Accuracy	15
Maintenance & Repair	1. Customer Trouble Report Rate	17
	2. Missed Repair Appointments	18
	3. Out of Service > 24 Hours	19
	4. Percent Repeat Troubles w/i 30 days	19
	5. Maintenance Average Duration	19
	6. Average Answer Time - Repair Center	22
	7. Average OSS Response Interval	22
	8. OSS Interface Availability	22
Billing	1. Invoice Accuracy	24
	2. Invoice Timeliness	24
	3. Usage Data Delivery Timeliness and Completeness	25
	4. Usage Data Delivery Accuracy	25
Operator Services (Toll) and Directory Assistance	1. Average Time to Answer	27
	2. Percent Answered within "X" Seconds	27
E911	1. Timeliness	29
	2. Accuracy	29
Trunk Group Performance	1. Comparative Trunk Group Service Summary	31
	2. Trunk Group Service Report	31
	3. Trunk Group Service Detail	31
Appendix A	Reporting Scope	36
Appendix B	Glossary of Acronyms and Terms	38

PRE-ORDERING AND ORDERING OSS

Function:	Average Response Interval for Pre-Ordering and Ordering Legacy 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, product and feature availability, and the validity of the street address. Typically, this type of information is gathered from the supporting OSS's while the customer (or potential customer) is on the telephone with the customer service agent. This information may be gathered via stand-alone pre-order inquiries or as part of the ordering function. Pre-ordering ordering activities are the first contact that a customer may have with a CLEC. This measure is designed to monitor the time required for the CLEC interface systems to obtain from legacy systems the pre-ordering ordering information necessary to establish and modify service. This measurement also captures the availability percentages for the BST systems that the CLEC uses during pre-ordering and ordering. Comparison to BST results allow conclusions as to whether an equal opportunity exists for the CLEC to deliver a comparable customer experience.
Measurement Methodology:	1. Average Response Interval = Sum [(Date & Time of Legacy Response) - (Date & Time of Request to Legacy)] (Number of Legacy Requests During the Reporting Period) The response interval for retrieving pre-order order information from a given legacy is determined by summing the response times for all requests (contracts) submitted to the legacy during the reporting period and then dividing by the total number of legacy requests for that day. The response interval starts when the client application (LENS for CLECs; RNS for BST) submits a request to the legacy system and ends when the appropriate response is returned to the client application. The number of legacy accesses during the reporting period that take less than 2.3 seconds and the number that take more than 6 seconds are also captured. Definition: Average response time for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for Telephone Numbers (TNs), and Customer Service Records (CSRs). 2. OSS Interface Availability = (Actual Availability) (Scheduled Availability) X 100 Definition: Percent of time OSS interface is actually available compared to scheduled availability. Availability percentages for CLEC interface systems and for all legacy systems accessed by them are captured.

PRE-ORDERING AND ORDERING OSS

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

LEGACY SYSTEM ACCESS TIMES FOR RNS

System	Contract	Data	< 2.3 sec	> 6 sec	Avg. Sec	# of Calls
RSAG	RSAGTEN	Address	x	x	x	x
RSAG	RSAGADDR	Address	x	x	x	x
ATLAS	ATLASTN	TN	x	x	x	x
DSAP	DSAPDDI	Schedule	x	x	x	x
CRIS	CRSACCTS	CSR	x	x	x	x
OASIS	OASISNET	Feature/Svc	x	x	x	x
OASIS	OASISBSN	Feature/Svc	x	x	x	x
OASIS	OASISCAR	Feature/Svc	x	x	x	x
OASIS	OASISLPC	Feature/Svc	x	x	x	x
OASIS	OASISMTN	Feature/Svc	x	x	x	x
OASIS	OASISOCP	Feature/Svc	x	x	x	x

LEGACY SYSTEM ACCESS TIMES FOR LENS

System	Contract	Data	< 2.3 sec	> 6 sec	Avg. Sec	# of Calls
RSAG	RSAGTEN	Address	x	x	x	x
RSAG	RSAGADDR	Address	x	x	x	x
ATLAS	ATLASTN	TN	x	x	x	x
DSAP	DSAPDDI	Schedule	x	x	x	x
HAL	HALCRIS	CSR	x	x	x	x
COFFI	COFIUSOC	Feature Svc	x	x	x	x
P SIMS	PSIMSORB	Feature/Svc	x	x	x	x

PRE-ORDERING AND ORDERING OSS

OSS Interface Availability

OSS Interface	% Availability
LENS	x
LEO Mainframe	x
LEO UNIX	x
LESOG	x
EDI	x
HAL	x
BOCRIS	x
ATLAS COFFI	x
RSAG DSAP	x
SOCS	x

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 applicable BST results, 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.
Measurement Methodology:	1. Firm Order Confirmation Timeliness = $\sum$ [(Date and Time of Firm Order Confirmation) - (Date and Time of Service Request Acknowledgment)] (Number of Service Requests Confirmed in Reporting Period) Definition: 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. Results are provided based on four (4) hour increments within a 24 hour period, along with the percent greater than 24 hours. Methodology: • Non-Mechanized Results are based on actual data from all orders. • Mechanized Results are based on actual data for all orders from the OSS. • BST retail report not applicable. 2. Reject Interval = $\sum$ [(Date and Time of Service Request Rejection) - (Date and Time of Service Request Acknowledgment)] (Number of Service Requests Rejected in Reporting Period). Requests are provided based on four (4) hour increments within a 24 hour period, along with the percent greater than 24 hours. Definition: Reject Interval is the average reject time from receipt of service order request to distribution of rejection. Methodology: • Non-Mechanized Results are based on actual data from all orders. • Mechanized Results are based on actual data for all orders from the OSS. • BST retail report not applicable. 3. Percent Rejected Service Requests = $\sum$ (Total Number of Rejected Service Requests) (Total Number of Service Requests Received) X 100. Definition: 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 • BST mechanized order tracking.

ORDERING

Measurement Methodology:	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. Definition: Percent Flow-through Service Requests measures the percentage of orders submitted electronically that utilize BSTs' OSS without manual (human) intervention Methodology: • Mechanized tracking for flow-through service requests and manual SOER error audit reports (3 31 98). Mechanized tracking for SOER errors and flow-through (4 30 98). • BST mechanized order tracking. 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 Definition: 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. Service Request Cycle Time captures both reject and commitment intervals. Results are also provided in four (4) increments within a 24 hour period, along with the percent greater than 24 hours. 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) Definition: 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. • BST retail report not applicable. 7. Speed of Answer in Ordering Center = ∑ (Total time in seconds to reach LCSC) (Total # of Calls) in Reporting Period. Definition: 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. • Mechanized tracking through BST retail center support systems.

ORDERING

Reporting Dimensions:	Excluded Situations:
• CLEC Specific • CLEC Aggregate • BST Aggregate (Where Applicable) • State and Regional Level • Dispatch, No Dispatch, ≤ 10 and ≥ 10 Circuit Categories not available in a pre completion order mode	• Firm Order Confirmation Interval: Invalid Service Requests, and orders received outside of normal business hours • Percent Flow-through Service Requests: Rejected Service Requests • % Rejected Service Requests: Service Requests canceled by the CLEC • Supplements on Manual Orders
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 • State and Region	• 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 • State and Region

Firm Order Confirmation Distribution Interval and Average Interval

	Mechanized LSRs	Non-Mechanized LSRs
Local Interconnection Trunks		
UNE	X	X
Resale - Residence	X	*
Resale - Business	X	*
Resale - Special	X	X
UNE - Loops w LNP	X	X
Other**	X	X

Reject Distribution Interval and Average Interval

	Mechanized LSRs	Non-Mechanized LSRs
Local Interconnection Trunks		
UNE	X	X
Resale - Residence	X	*
Resale - Business	X	*
Resale - Special	X	X
UNE - Loops w LNP	X	X
Other**	X	X

*** For Non-Mechanized Resale Residence and Business Orders, A Combined Residence and Business Total Is Provided.**

**** Service Requests Which Do Not Have Service Class Code Populated.**

ORDERING

Percent Rejected Service Requests

	Mechanized LSRs	Non-Mechanized LSRs		BST Percent Rejected Service Requests	
Local Interconnection Trunks				Residence	X
UNE	X	X		Business	X
Resale - Residence	X	*			
Resale - Business	X	*			
Resale - Special	X	X			
UNE - Loops w LNP	X	X			
Other**	X	X			

Percent Flow-Through Service Requests

	Mechanized LSRs		BST Percent Rejected Service Requests	
Local Interconnection Trunks			Residence	X
UNE	X		Business	X
Resale - Residence	*			
Resale - Business	*			
Resale - Special	X			
UNE - Loops w LNP	X			
Other**	X			

Total Service Request Cycle Time

	Mechanized LSRs	Non-Mechanized LSRs
Local Interconnection Trunks		
UNE	X	X
Resale - Residence	X	*
Resale - Business	X	*
Resale - Special	X	X
UNE - Loops w LNP	X	X
Other**	X	X

Service Request Submissions per Request

	Mechanized LSRs
Local Interconnection Trunks	
UNE	X
Resale - Residence	*
Resale - Business	*
Resale - Special	X
UNE - Loops w LNP	X
Other**	X

*** For Non-Mechanized Resale Residence And Business Orders, A Combined Residence and Business Total Is Provided.**

**** Service Requests Which Do Not Have Service Class Code Populated.**

ORDERING

Speed of Answer in Ordering Center

	Ave Answer time (Sec) month
LCSC	X
Residence Service Center	X
Business Service Center	X

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 = ∑ [(Completion Date & Time) - (Order Issue Date & Time)] / (Count of Orders Completed in Reporting Period) 2. Order Completion Interval Distribution = ∑ (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, the total numbers of orders completed within the reporting interval and the interval between the issue date of each order and the completion date. For each reporting dimension, the resulting count of orders completed for each specified time period following the issue date is divided by the total number of orders completed with the resulting fraction expressed as a percentage. Definition: Average time from receipt of (confirmed) service request to actual order completion date. Methodology: • Mechanized metric from ordering system

PROVISIONING

Reporting Dimensions:	Excluded Situations:
• CLEC Specific • CLEC Aggregate • BST Aggregate • State and Regional Level • ISDN Orders included in Non Design - GA Only • Includes Orders Where Customer Requested A Due Date Beyond "Offered" Date	• "D" and "F" Orders
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 • State and Region	• Report Month • Average Order Completion Interval • Order Completion by Interval • Service Type • Activity Type • State and Region

Order Completion Interval Distribution and Average Completion Interval

RESALE RESIDENCE	Same Day	1	2	3	4	5	>5	Average Completion Interval
Dispatch								
CLEC orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x
BST orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x
No Dispatch								
CLEC orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x
BST orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x

RESALE BUSINESS	Same Day	1	2	3	4	5	>5	Average Completion Interval
Dispatch								
CLEC orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x
BST orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits	x	x	x	x	x	x	x	x
No Dispatch								
CLEC orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits								
BST orders								
< 10 circuits	x	x	x	x	x	x	x	x
>= 10 circuits								