

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Application by BellSouth Corporation,) CC Docket No. 98-121
BellSouth Telecommunications, Inc.,)
and BellSouth Long Distance, Inc., for)
Provision of In-Region, InterLATA)
Services in Louisiana)

Reply Affidavit of William N. Stacy
on Behalf of BellSouth

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REPLY AFFIDAVIT OF WILLIAM N. STACY
ON BEHALF OF BELL SOUTH

STATE OF Georgia
COUNTY OF Fulton

William N. Stacy, being first duly sworn upon oath, hereby deposes and states as follows:

1. My name is William N. Stacy. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth Telecommunications as Operating Vice President, Interconnection Operations, for the nine state BellSouth region. Having provided an affidavit regarding performance measurements supporting BellSouth's initial Section 271 application before the FCC, I herein respond to comments received on that application.

I. PURPOSE OF AFFIDAVIT

2. The purpose of this affidavit is to address issues raised by parties in this proceeding regarding BellSouth's performance measurements as provided in BellSouth's Service Quality Measurements (SQM) document and the associated reports on those measurements attached as exhibits WNSPM-1 and WNSPM-3 respectively to my original affidavit.

II. SERVICE QUALITY MEASUREMENT ISSUES

3. **DISAGGREGATION** - The following parties raised issues associated with disaggregation of performance measurements: WorldCom at 3, 12-14; CompTel at 7, 11-12; e*spire at 35; Hyperion at 7-8; Pfau/Dailey Affidavit (AT&T) ¶¶ 95-97, Attachment 3; MCI at 38-40; SPRINT at 39; ALTS at 12-13; Closz Affidavit (SPRINT) ¶¶ 36-39.
4. These intervenors recommend a level of product and geographic disaggregation that far exceeds what BellSouth is reporting today using the current capabilities of its systems. BellSouth has opposed any level of disaggregation beyond that included in the Service Quality Measurements ("SQM"). These SQMs reflect the current capabilities of BellSouth's systems. BellSouth's systems for generating performance reports are already stretched to capacity and BellSouth is adding a half million dollar upgrade just to produce the current reports to the CLECs that are active today. BellSouth currently has contracts with over 470 CLECs and had posted 12,167 separate performance measurement files on its Web site as of July 15, 1998. To implement the intervenors' proposed reporting at multiple product

and MSA levels would require months of additional work and millions more dollars of investment to reprogram computer software and add hardware.

BellSouth believes that those CLECs that want additional disaggregation should negotiate and pay for that kind of reporting. To require this level of voluminous reporting across the board for all CLECs would be unwarranted, wasteful and unnecessary. More specifically, disaggregation by both MSA and the number of products proposed pose a number of problems that have not been addressed by those who propose this level of reporting. First, the hardware and software to produce this information is very expensive and would have to be purchased and installed, which would take 9 to 12 months for total completion. Second, this requirement would inundate the CLECs with larger reports giving more, but likely less useful, data. A count of the pages of data produced in June for one representative CLEC in Louisiana, using the current SQM, showed that this CLEC received 111 pages of reports: 36 pages of "Raw Data" and 75 pages of reports, on which only 7% of the total lines contained actual data for the CLEC. If BellSouth is required to disaggregate by MSA (of which there are 64 in the BellSouth territory, including 8 in Louisiana) and by product, the number of pages and lines with no data grows geometrically. Third, it is not technically feasible to disaggregate some reports geographically and/or by product. This is true, for example, of measurements relative to regionalized OSSs. In addition, in some cases where disaggregation is technically feasible, it makes no sense because it will produce no additional meaningful data (see attached Exhibit WNSPM REPLY-1). Fourth, the current SQM provides the information required by the Act to allow the FCC, state regulatory authorities, and CLECs to determine whether discrimination is taking place (see attached Exhibit WNSPM REPLY-2).

A. PRODUCT DISAGGREGATION.

5. Some CLECs continue to recommend reporting numerous additional product categories, without acknowledging the cost or delay associated with the capabilities they propose. For example, BellSouth has begun the effort of mechanically capturing the information to report UNE Loops with LNP, and just this one addition to the Service Order Completion System (SOCS) will cost approximately \$700,000 and require 8 months to finalize. In addition, the “products” proposed are not clearly defined and do not relate to BellSouth’s systems.
6. Despite BellSouth’s concerns, however, on August 19, 1998, the Louisiana Public Service Commission, in Docket U-22252, Subdocket C (Exhibit WNSPM REPLY-3), voted to order BellSouth to disaggregate its SQMs using the following product disaggregation for provisioning and maintenance & repair performance measurement categories:
 - resale residential POTS (dispatch & non-dispatch)
 - resale business POTS (dispatch & non-dispatch)
 - resale Centrex (dispatch & non-dispatch)
 - resale PBX (dispatch & non-dispatch)
 - other resale (dispatch & non-dispatch)
 - unbundled loops 2-wire
 - w/interim number portability
 - w/o interim number portability

- unbundled loops all other
 - w/interim number portability
 - w/o interim number portability
- unbundled ports
- interconnection trunks

In addition, the Louisiana PSC adopted its staff's recommendation that the PSC review and assess the performance data reported by BellSouth over the next six months, and through additional workshops determine if more or less disaggregation is necessary. Although BellSouth is still opposed to the level of product disaggregation ordered by the Louisiana PSC (regardless of the specific performance categories), and although the FCC, the Louisiana PSC and CLECs already have the data necessary to demonstrate nondiscriminatory service, BellSouth is beginning the process of purchasing the necessary additional hardware and reprogramming of the appropriate systems to capture the data required by the PSC.

B. GEOGRAPHIC DISAGGREGATION.

7. BellSouth does business at the regional and state-wide levels and should not be forced to incur unnecessary expense to report at the MSA or any lower level just because some CLECs, who have no obligation to serve any and all customers, have chosen to "cherry-pick" lucrative customers in certain urban areas. Nothing in the Telecommunications Act of 1996 ("1996 Act") imposes such a reporting requirement on BellSouth. BellSouth is not categorically opposed to generating

this information; it is simply that this additional expense should be borne by CLECs who desire and negotiate for such additional, technically feasible disaggregation.

8. The only categories for which "sub-state" reporting can be accommodated and would be useful are Provisioning, Maintenance and Repair, and Trunk Group Performance. Indeed, these are the only areas where CLECs suggest any utility to such reporting. For example, AT&T states: "Statewide or region-wide data will yield less meaningful comparisons than data that is provided according to the area in which the work is done. For example, in rural areas, travel times for dispatch activities may be longer or technology may be less modern than that found in urban areas." *See AT&T Original Comments, Louisiana Docket U-22252, Subdocket C, at pp. 9-10.* For other functions, statewide comparisons are amply detailed. The Pre-Ordering and Ordering process, for instance, takes place in two (2) centralized regional ordering centers that may not even be in the state where the order will eventually be worked.
9. The Louisiana PSC also determined in its vote on August 19, 1998, to order BellSouth to produce MSA-level reporting in addition to region-level and state-level reporting for provisioning, maintenance & repair and trunk group performance measurement categories. As stated previously, BellSouth has already initiated the process to purchase the necessary hardware, reprogram the appropriate systems, and acquire the necessary additional resources to produce this data. Although BellSouth believes that the PCS-ordered time frame of four

(4) months to produce this level of disaggregation is unrealistic, BellSouth has agreed to provide the Louisiana PSC with regular updates on its progress.

10. **PERFORMANCE STANDARDS** - Various commenters urge the development of performance standards or benchmarks whenever a reasonable retail analogue does not exist. (MCI at 33-34; e*spire at 34; SPRINT at 39-40; Henry Affidavit (MCI) ¶¶ 39-47, MCI at 30-35; Closz Affidavit (SPRINT) ¶¶ 42-44)

11. Establishing rigid standards for performance is premature. Instead, the Louisiana PSC and the CLECs operating in Louisiana should first monitor and analyze concrete data furnished under BellSouth's SQM, and then permit the parties to negotiate individualized performance standards tailored to the needs of individual parties and BellSouth's actual operations. As explained by this Commission in tentatively rejecting the establishment of performance standards (See *Notice of Proposed Rulemaking, In Re: Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56 ("NPRM")*, ¶ 125):

“There is little in the current record to explain how such standards would be used as a method of evaluating compliance with statutory requirements. Moreover, any model performance standards should be grounded in historical experience to ensure that such standards are fair and reasonable. Because our present record lacks the necessary historical data, we believe that it would be premature for us to develop standards at this point. We tentatively conclude, therefore, that we should postpone consideration of performance standards until parties have had the opportunity to consider how they would be used and have been able to review actual performance data over a period of time.”

12. It is BellSouth's position that it likewise would be premature to consider performance standards in this proceeding. However, BellSouth would support a

process that involves state-specific industry workshops and review and comparison of data over the next 6 to 12 months. This would include comparing BellSouth's Louisiana performance to performance in other states. In its vote on August 19, 1998, the Louisiana Public Service Commission decided to include in its Order its support of this process by stating that special studies to establish benchmark performance levels and their associated methodology be further refined over the next six months through the continuation of workshops on performance measurements.

13. **ENFORCEMENT AND DISPUTE RESOLUTION** - Several parties raised the issue of enforcement mechanisms and dispute resolution. See Hyperion at 9; Intermedia at 14; WorldCom at 30-31; Pfau/Dailey Affidavit (AT&T) ¶ 64; MCI at 35-38; ALTS at 13; and DOJ at 38-39.
14. BellSouth is in general agreement with the initial conclusion of the FCC that "it is premature to propose model enforcement mechanisms for violations of OSS requirements." (*NPRM* ¶130) BellSouth believes that this Commission lacks legal authority to require "self-executing" penalties or "credits" relating to local facilities and services, outside of the state-supervised negotiation and arbitration process. Even assuming the FCC had this power, however, it would be premature to impose such requirements until the industry has developed much greater experience in this arena. BellSouth therefore supports the position adopted by the Louisiana Public Service Commission in its vote on August 19, 1998, in Docket U-22252, Subdocket C, that "the entire process of developing performance measurements, developing performance benchmarks, developing new systems for use by CLECs, and CLECs developing their own systems for resale and providing

UNEs, are simply too new and evolving to establish financial enforcement mechanisms at this time.”

15. **STATISTICAL ANALYSIS** - Parties also have offered recommendations on the issue of statistical analysis and the appropriate statistical analysis vehicle necessary to demonstrate parity. See AT&T at 49-50; Pfau/Dailey Affidavit (AT&T) ¶¶ 58-64; SPRINT at 37-40; Cloz Affidavit (SPRINT) ¶¶ 40-41.
16. BellSouth believes that the process of measuring incumbent LECs' performance is too new to set in stone a particular statistical methodology. BellSouth recommends further study and workshops, before state Commissions, in which the parties can work in a collaborative fashion to reach agreement on an appropriate statistical methodology. Practical considerations also must be taken into account. For example, BellSouth's systems are simply not capable of running the "z"- test at this time, and would require major software and hardware additions in order to permit them to do so. BellSouth has already developed the coding requirements for its SQM reports. However, the raw data (numbers) required to compute standard deviations on those dimensions where an average is computed are not now tracked or maintained. This means that before BellSouth could even start practical evaluation of any statistical analysis tool, it will have to reprogram many of the report codes to capture the appropriate numbers to use for this effort. Additionally, BellSouth has become aware that the 4GL programs used in BellSouth's performance measurements system and data warehouse do not have the necessary mathematical analysis capability and the data will have to be moved into another system entirely to perform any such analysis.
17. On August 19, 1998, the Louisiana Public Service Commission voted to order BellSouth to perform the statistical testing that BellSouth has proposed, the

modified z-test endorsed by the Local Competition Users Group (LCUG), and the pooled variance test mentioned by the FCC in its NPRM, Appendix B. The PSC staff stated in its final recommendation that "these statistical tests [should] be performed so that they can be evaluated at subsequent workshops to determine which method is best suited for measuring parity in Louisiana" and finally, that "the development of performance measurements, the determination of retail analogues, the development of performance standards or benchmarks, and the complexities of statistical testing require that no one test be endorsed at this time." This Commission should allow the Louisiana PSC's deliberate approach to establishing a statistical test to move forward, without disrupting the evaluation contemplated by the PSC.

18. **AUDITS** - AT&T, WorldCom, e*spire and Hyperion, criticize BellSouth's measurements because they do not expressly confer upon CLECs a mandatory right to audit the information. (WorldCom at 17; Pfau/Dailey Affidavit (AT&T) ¶ 98; e*spire at 26; Hyperion at 9) BellSouth already provides many CLECs with audit rights as a part of their interconnection agreements. BellSouth also has offered to conduct a comprehensive audit of the aggregate level reports for both BellSouth and the CLECs for each of the next five years, to be conducted by an independent third-party. The results of that audit would be made available to all the parties subject to proper safeguards to protect proprietary information. Because it is not reasonable to expect BellSouth to undergo an audit for every CLEC with which it has a contract (470 audits or more a year), some reasonable controls must be in place. The Louisiana Public Service Commission, in its vote on August 19, 1998, endorsed BellSouth's offer with the following conditions:

- the cost be borne 50% by BellSouth and 50% by the CLECs

- the independent third party auditor shall be selected with input from both BellSouth and the CLECs
- the scope of the audit shall be jointly determined by BellSouth and the CLECs
- the LPSC endorses a single company-wide audit because small start-up CLECs may not have the resources to conduct audits, monitor performance, and detect discrimination.

19. **CLEC vs. IXC MEASUREMENTS** - MCI (at 71-72) and WorldCom (at 14-15)

suggest that BellSouth is deficient in its performance measurements because BellSouth does not offer performance measurements on “access,” that is, exchange access, in this preceeding.

20. The purpose of BellSouth’s SQM is to define and deliver a set of performance measurements that demonstrate that BellSouth provides “substantially the same” service and/or “a meaningful opportunity to compete” to CLECs in the delivery of local service, as compared to how BellSouth provides local service to its own local retail customers. Contrary to the suggestion of WorldCom and MCI, the services provided to interexchange carriers are not relevant to BellSouth’s satisfaction of the competitive checklist. This is, moreover, an area that the FCC has regulated for many years, and the commenters have not provided any basis to doubt the sufficiency of the Commission’s rules and regulatory requirements.

21. **FLOW-THROUGH** – A number of parties address the flow-through measurements provided with my initial affidavit. (DOJ at 30-31; CompTel at 6-9; AT&T at 4, 42-43; Pfau/Dailey Affidavit (AT&T) ¶¶ 73-76, attachment 2; Green Affidavit (MCI) ¶¶ 30, 157; e*spire at 30; ALTS at 14-16; Closz Affidavit (SPRINT) ¶ 46; Bradbury Affidavit (AT&T) ¶¶ 13, 20-21, 196, 251, 257-267;

MCI at 48-50) As I discuss in my OSS Reply Affidavit, in evaluating these concerns BellSouth discovered an error in the flow-through report calculation provided with its EDI application which negatively impacted flow-through rates for EDI users and also the total flow-through rate for CLECs. The error occurred when "LESOG ineligible" complex services were included in the "LESOG eligible" base of orders in the flow-through reports. (See Stacy OSS Affidavit, ¶¶ 88, 136, 137) BellSouth has corrected this error and the corrected data is shown in the attached revised Flow-Through Reports for March-July, 1998, as exhibits WNSPM REPLY-4a - 4e. The corrected flow-through rates for March, April, May, June and July, 1998 are as follows:

1998	Old Flow-Through	New Flow-Through
March	78.6%	85.60%
April	76.4%	84.60%
May	81.53%	86.38%
June	82.70%	87.08%
July	86.52%	90.88%

Also, attached as exhibits WNSPM REPLY-5a & 5b and provided for the information of the commission, are detailed analysis of the flow-through results using June 5, 1998, and July 2, 1998. test data, which includes test results, error breakdown by error type, and number of errors by individual CLECs.

As is obvious from these new reports, BellSouth's flow-through rates are significantly better than originally reported and, like the earlier data, substantially similar to BellSouth's own retail flow-through rates.

22. **PARITY** - Several of the intervenors (e*spire at 4, 21-22, 33-35; WorldCom at 27-28; Pfau/Dailey Affidavit (AT&T) ¶¶ 21, 59, 65-87; Closz Affidavit (SPRINT)

¶ 45, 46; Bradbury Affidavit (AT&T) ¶¶ 255-256; CompTel at 6-7; and DOJ at 29-35) have cited a few selected measurements from BellSouth's performance reports, attached to my original affidavit as exhibit WNSPM-3, and present these examples as supposed proof of BellSouth's alleged failure to provide "parity" treatment.

23. These intervenors would lead this Commission to believe that "parity" is being achieved only if BellSouth is providing equal or better treatment to the CLECs than it provides to its own retail customers in every measurement category at a given time. This was not and never has been a requirement of the Act. Attached is exhibit WNSPM REPLY-6 which provides a subset of the data provided in the reports which were included with my original Affidavit. The data selected as examples by the above mentioned CLECs is highlighted. This will demonstrate the selective nature of the choices made. Service levels will vary from month to month for numerous reasons. It is not reasonable for any CLEC to expect only "equal or better" service in each and every category for each and every month unless that CLEC is willing to pay a premium to receive that higher level of service. This reinforces the wisdom of the FCC's NPRM and the Louisiana Public Service Commission's decision to evaluate methods to analyze performance data over time through industry workshops.

24. **ALLEGEDLY MISSING MEASUREMENTS** - e*spire, at 33-35, identified several measurements which they incorrectly allege are missing from BellSouth's SQM. Below, I list these measurements along with the page number where they

are addressed in BellSouth's SQM (Exhibit WNSPM-1 of my original Affidavit on performance measurements):

- a) Average Time to Respond to Collocation Request, SQM page 39
- b) Average Time to Provide Collocation, SQM page 39
- c) Percentage of Collocation Due Dates Missed, SQM page 39
- d) Average Customer Conversion Interval, SQM page 18
- e) Average Jeopardy Interval, SQM page 14
- f) Percentage of Orders given Jeopardy Notices, SQM page 14
- g) Average Time to Provide Usage Records, SQM page 28. Average Completion Notice Interval, SQM page 19, also identified as missing in Closz Affidavit (SPRINT) ¶ 35. e*spire and SPRINT are correct that there is currently no data for this measurement. This measurement is under development by BellSouth.
- h) Percentage of Troubles within X days of New Orders, SQM page 15.

The Pfau/Dailey Affidavit (AT&T) ¶¶ 28, 48-49, 51, ¶¶ 80, 84-85; and DOJ at 32-33, mischaracterize several additional measurements.

- a) Unbundled Network Elements, UNEs - BellSouth's SQM does disaggregate Ordering and Provisioning measurements by UNE. There have also been contentions from CLECs that the UNE categories were not clearly defined. Attached Exhibit WNSPM REPLY-7 shows, in detail, how BellSouth has categorized UNEs for each report. However, the Act does not require the recombination of UNEs or measurements associated

with that recombination.

- b) AT&T attempts to convince the Commission that BellSouth's Average Completion Interval, SQM page 9, does not include the additional time it takes to notify a CLEC that an order has been completed. This is not accurate. The CLEC is contacted by telephone or electronically immediately when each order is completed. BellSouth plans to report Average Completion Notice Interval as a separate measurement, SQM page 19. While data for this measurement is currently lacking, BellSouth plans to have the data available in October, 1998.
- c) Percent Provisioning Order Accuracy - In ¶ 68 of its NPRM, this Commission recommends replacement of this measure with Percent Provisioning Troubles within 30 Days of Installation, on the basis that Order Accuracy can be measured only by a manual sampling process. BellSouth supports this recommendation.
- d) Jeopardy measurements - Are included in the SQM as Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices, page 14.
- e) Number of Service Requests per Submission - This measurement is the converse of Percent Rejected Service Requests and would measure only the CLEC's performance in correctly issuing an order, not any performance by BellSouth.

25. **RETAIL ANALOGUES** - Several parties (e*spire at 4, 21-22, 33-35; Intermedia at 13, 27-28; CompTel at 11; Pfau/Dailey Affidavit (AT&T) ¶¶ 21-27, 30-38, 40, 42, 44-47; WorldCom at 15) have faulted BellSouth for failing to compare certain

CLEC-specific measurements with a BellSouth retail equivalent. The measurements cited by these parties as not showing a direct comparison between CLECs and BellSouth retail are: Collocation, % Rejected Service Requests, Reject Interval, FOC Interval, Average Jeopardy Notice Interval, % Orders given Jeopardy Notice, Coordinated Customer Conversions, Order Completion Notice, and Number of Service Requests per Request. These measurements represent only 15% of BellSouth's SQMs. There are no retail equivalents for these measurements. This Commission has consistently noted that not every service an ILEC provides to a CLEC has a direct ILEC analogue, and therefore has crafted a standard to evaluate ILEC delivery of these services. *NPRM* ¶ 29 ("For those OSS functions that have no direct retail analogue, such as the ordering and provisioning of unbundled network elements, an incumbent LEC must provide access sufficient to allow an efficient competitor a meaningful opportunity to compete"); *Local Competition Order First Report and Order*, 11 FCC Rcd at 15766, ¶ 523. Nevertheless, the commenters suggest that this Commission create analogues where none exist, and then require parity for the phony "analogue." This Commission should continue its course and reject this misplaced exercise in creativity. The LPSC also rejected this course and chose to develop benchmarks only after historical data has been evaluated.

26. **BELLSOUTH WEB SITE** - Pfau/Dailey Affidavit (AT&T) ¶¶ 100-102, addresses several shortcomings they claim exist in BellSouth's Web site. The sheer quantity of information BellSouth provides via its Web site (as indicated previously in this affidavit, a single representative CLEC in Louisiana had 111

pages of reports in June on the Web site) necessitates the need for CLECs to take some degree of responsibility for retrieving the information in a way that is most meaningful to each individual CLEC. Furthermore, as of August 15, 1998, in addition to the standard reports, BellSouth has made available via the Internet Web site all raw data necessary for a CLEC to calculate any of the SQM reports (based on July data), including reject interval measurements for individual CLECs. (CLEC aggregate raw data is not available in order to secure and protect individual CLEC proprietary information) These raw data files provide the CLEC the most detailed and precise data about its activity available to BST. But because this raw data is so detailed and precise, it is also complex and requires CLECs to apply the appropriate skills to analyze the raw data correctly. To facilitate this analysis, BellSouth has made available to CLECs the documentation necessary to explain in detail the contents and meaning of the raw data files on an adjoining section of the Web site. This documentation describes the format and content of each field in the data files, and the relationship between these fields and the calculations in the report. In the "Regional Reports" section of the BellSouth Web site, BellSouth provides approximately 42 separate reports with BST retail measurements that are directly comparable to either aggregate reports for CLECs or CLEC-specific reports also included on the Web site. The CLEC-specific information is password protected.

I hereby swear that the foregoing is true and correct to the best of my information and belief.

William N. Stacy

William N. Stacy
Operations Vice President
Interconnection Services
BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this
the 25 day of August, 1998.

Jarvis E Padgett
Notary Public

Notary Public, Gwinnett County, GA
My Commission Expires Feb. 18, 2000

DISAGGREGATION OF BELL SOUTH PERFORMANCE MEASUREMENTS BELOW STATE AND BY PRODUCT LEVEL

CATEGORY	FUNCTION	PG #	GEOGRAPHIC PRODUCT	
			SENSIBLE/FEASIBLE	SENSIBLE/FEASIBLE
A. Pre-Ordering and Ordering OSS	1. Average OSS Response Interval	2	No/Yes	No/No
	2. OSS Interface Availability			
B. Ordering	1. Percent Flow-through Service Requests	5	No/Yes	No/Yes
	2. Percent Rejected Service Requests	5	No	No
	3. Reject Interval	5	No	No
	4. Firm Order Confirmation Timeliness	6	No/Yes	No/Yes
	5. Speed of Answer in Ordering Center	6	No	No
C. Provisioning	1. Average Completion Interval Order Completion Interval Distribution	9	Yes	Yes
	2. Held Order Interval Distribution and Mean Interval	12	Yes	Yes
	3. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	14	Yes	Yes
	4. Percent Missed Installation Appointments	15	Yes	Yes
	5. Percent Provisioning Troubles w/i 30 days	15	Yes	Yes
	6. Percent Order Accuracy (GA & LA only)	15		
	7. Coordinated Customer Conversions	18	Yes	Yes
	8. Average Completion Notice Interval	19	Yes	Yes
D. Maintenance & Repair	1. OSS Interface Availability	20	No	No
	2. Average OSS Response Interval	20	No	No
	3. Average Answer Time - Repair	21	No	No
	4. Missed Repair Appointments	22	Yes	Yes
	5. Customer Trouble Report Rate	23	Yes	Yes
	6. Maintenance Average Duration	24	Yes	Yes
	7. Percent Repeat Troubles w/i 30 days)	24	Yes	Yes
	8. Out of Service > 24 Hours	24	Yes	Yes
E. Billing	1. Invoice Accuracy	27	No	No
	2. Invoice Timeliness	27	No	No
	3. Usage Data Delivery Accuracy	28	No	No
	4. Usage Data Delivery Timeliness and Completeness	28	No	No
F. Operator Services (Toll) and Directory Assistance	1. Average Speed to Answer	30	No	No
	2. Percent Answered within "X" Seconds	30	No	No
G. E911	1. Timeliness	32	No	No
	2. Accuracy	32	No	No
H. Trunk Group Performance	1. Trunk Group Service Summary	34	No/Yes	No
	2. Trunk Group Service Detail	34	No/Yes	No
I. Collocation	1. Average Response Time	38	No	No
	2. Average Arrangement Time	38	No	No
	3. % of Due Dates Missed	38	No	No
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**DISAGGREGATION OF BELL SOUTH PERFORMANCE MEASUREMENTS BELOW STATE
AND BY PRODUCT LEVEL**

Pre-Ordering - Disaggregation By Service and Geographic Segment is not appropriate. The pre-ordering systems are regional systems and no meaningful data would be added by disaggregation.

Ordering - Disaggregation By Service is appropriate but it must be noted that in order to track any services not presently tracked by BST systems will require additional time and money to fix. As noted, to develop the tracking capability for UNE Loop with LNP will cost \$700,000 and require 8 months. **Disaggregation By Geographic segment** is not appropriate. Ordering centers for both BST and CLECs are centralized. BST's ordering centers are regional. In many cases the ordering center is not even in the state, therefore, geographic segments have no relevance to the report and are not required.

Provisioning - Disaggregation By Service and Geographic Segment is appropriate.

Maintenance and Repair - Disaggregation By Service and Geographic Segment is appropriate with the exception of regional systems noted.

Billing- Disaggregation By Service and Geographic Segment is not appropriate. Billing is a regional system.

Operator Services and Directory Assistance - Disaggregation By Service and Geographic Segment is not appropriate. The state level is the appropriate level.

E911 - Disaggregation By Service and Geographic Segment is not appropriate. The regional level is the only appropriate level. The information for the reports is actually furnished by a third party vendor.

Trunk Group Performance - Disaggregation By Service and Geographic Segment is not appropriate. Every trunk group in the state that exceeds the threshold is furnished every month.

Collocation - Disaggregation By Service and Geographic Segment is not appropriate. Disaggregation below state level provides no meaningful data. The current reports contain all the data for the state on one report.

**1998 SUMMARY DATA FOR SELECTED
BELLSOUTH SERVICE QUALITY MEASUREMENTS**

	MARCH	APRIL	MAY	JUNE
1. FOC, Mechanized LSRs with no errors (days)				
CLEC resale residence (LA)	0.14	0.31	0.06	0.05
CLEC resale business (LA)	0.25	0.50	0.30	0.02
CLEC resale residence (Region)	0.10	0.23	0.05	0.06
CLEC resale business (Region)	0.16	0.41	0.10	0.06
FOC, Mechanized LSRs with errors (days)				
CLEC resale residence (LA)	1.56	1.72	2.08	1.04
CLEC resale business (LA)	2.02	2.77	2.95	1.96
CLEC resale residence (Region)	1.59	1.87	1.96	1.32
CLEC resale business (Region)	1.99	3.14	3.03	2.08
FOC, Non Mechanized LSRs (days)				
CLEC resale residence (LA)	0.99	1.12	1.32	1.26
CLEC resale business (LA)	1.46	1.75	2.73	2.13
CLEC resale residence (Region)	1.23	1.21	1.43	1.35
CLEC resale business (Region)	1.58	2.13	2.58	1.90
2. Reject Interval, non-mechanized LSRs (days)				
CLEC resale residence (LA)	2.49	1.43	1.44	1.21
CLEC resale business (LA)	1.98	2.19	1.63	2.12
UNE (LA)	2.90	1.00	2.23	2.87
UNE Loop with LNP (LA)	4.44	1.68	4.80	1.35
CLEC resale residence (Region)	3.44	1.98	1.61	1.26
CLEC resale business (Region)	2.37	2.45	2.01	1.89
UNE (Region)	2.91	2.83	1.60	1.67
UNE Loop with LNP (Region)	2.66	2.10	1.38	1.55
Reject Interval, mechanized LSRs (days)	Mechanized (days) *	Mechanized (days) *	Mechanized (minutes)	Mechanized (minutes)
CLEC resale residence (Region)	7.98	7.82	0	0
CLEC resale business (Region)	5.11	6.67	0	0
UNE (Region)	0	0	0	0
UNE Loop with LNP (Region)	0	0	0	0
Other	12.92	6.61	0.78	0.81
3. Order Completion Interval No Dispatch (< 10 circuits)				
CLEC resale residence (LA)	1.98	1.74	1.93	1.62
CLEC resale business (LA)	1.10	0.98	1.61	1.58
BST retail residence (LA)	1.02	0.78	0.88	0.93
BST retail business (LA)	0.99	0.90	1.29	1.50
CLEC resale design (LA)	11.40	3.94	2.51	2.80
BST retail design (LA)	25.11	45.64	17.17	13.84
CLEC UNE design (LA)	0	0	0	0
CLEC UNE non-design (LA)	15.00	2.00	11.00	0
Order Completion Interval Dispatch (< 10 circuits)				
CLEC resale residence (LA)	3.48	3.97	4.01	3.65
CLEC resale business (LA)	2.90	3.54	3.65	5.13
BST retail residence (LA)	4.29	4.50	5.27	5.13
BST retail business (LA)	6.61	6.61	7.11	6.86
CLEC resale design (LA)	12.95	25.24	15.38	24.49
BST retail design (LA)	25.19	21.90	22.50	22.88
CLEC UNE design (LA)	12.41	10.11	12.00	22.00
CLEC UNE non-design (LA)	12.19	14.57	7.50	13.49

**1998 SUMMARY DATA FOR SELECTED
BELLSOUTH SERVICE QUALITY MEASUREMENTS**

	MARCH	APRIL	MAY	JUNE
4. % Missed Provisioning Appts. Dispatch (< 10 Circuits)				
CLEC resale residence (LA)	10.2	7.60	10.20	7.00
CLEC resale business (LA)	3.20	3.90	3.10	8.40
BST retail residence (LA)	6.20	5.10	5.90	7.10
BST retail business (LA)	4.60	3.70	4.90	4.50
5. Maintenance Average Duration (Disp)				
CLEC Local Interconnection Trunks	19.53	0	0	0
CLEC resale residence (LA)	22.82	21.88	23.65	18.07
CLEC resale business (LA)	12.63	10.87	16.07	18.47
CLEC resale design (LA)	10.67	10.13	6.73	0
BST Local Interconnection Trunks	5.11	0	4.53	33.33
BST retail residence (LA)	25.61	22.83	25.90	18.70
BST retail business (LA)	10.69	12.86	11.57	16.00
BST retail design (LA)	10.50	8.60	7.48	22.62
CLEC UNE design (LA)	39.26	47.67	47.41	39.99
Maintenance Average Duration No Dispatch				
CLEC Local Interconnection Trunks	0.15	0	0.28	0
CLEC resale residence (LA)	6.68	6.87	5.90	7.87
CLEC resale business (LA)	8.09	4.97	3.76	6.57
CLEC resale design (LA)	1.74	1.58	6.25	0.97
BST Local Interconnection Trunks	0.36	0	0.28	0.34
BST retail residence (LA)	8.38	6.68	7.87	9.40
BST retail business (LA)	5.05	6.47	4.84	5.91
BST retail design (LA)	2.21	1.92	1.87	1.89
CLEC UNE design (LA)	0	0	86.07	25.59
6. % Repeat Trbls. w/i 30 days (Disp)				
CLEC Local Interconnection Trunks	0	0	0	0
CLEC resale residence (LA)	13.92	15.63	16.93	18.07
CLEC resale business (LA)	10.34	22.76	20.28	18.47
CLEC resale design (LA)	11.76	0	27.78	0
BST Local Interconnection Trunks	53.49	7.35	2.84	33.33
BST retail residence (LA)	17.25	13.65	13.11	18.70
BST retail business (LA)	15.47	11.85	12.03	16.00
BST retail design (LA)	13.77	21.86	18.44	22.62
CLEC UNE design (LA)	0	0	0	22.22
CLEC UNE non design (LA)	0	0	50.00	100
% Repeat Trbls. w/i 30 days No Dispatch				
CLEC Local Interconnection Trunks	0	0	0	0
CLEC resale residence (LA)	16.86	18.81	17.15	20.38
CLEC resale business (LA)	13.16	15.07	23.64	19.08
CLEC resale design (LA)	0	66.67	7.14	0
BST Local Interconnection Trunks	2.33	7.35	2.84	8.79
BST retail residence (LA)	13.28	13.65	13.11	13.73
BST retail business (LA)	12.29	11.85	12.03	13.25
BST retail design (LA)	22.64	21.86	18.44	21.92
CLEC UNE design (LA)	0	0	0	0
CLEC UNE non design (LA)	0	0	0	0

- NOTE: The data for this report was in error for the months of March and April. The error was detected and the reports beginning in May reflect accurate reject intervals which for Mechanized LSRs was < 1 minute.