

BellSouth's Electronic Interfaces Often Fail to Operate as Designed

Percent of submitted orders directed to the LCSC by failure in January 2001

	LENS	TAG	EDI
LNP	-	52%	51% (60%)
UNE	19%	17%	12% (11%*)
BUS	33%	38%	27%
RES	9%	6%	8%

BellSouth Processing Failures

* OCN 7125 = 92%, OCN 7680 = 10%

**By Design BellSouth Accepts Orders Electronically and Then
Directs Them to the LCSC for Manual Handling**

**Percent of submitted orders directed to the LCSC by design in
January 2001**

	LENS	TAG	EDI
LNP	-	30%	35% (40%)
UNE	14%	17%	50% (26%*)
BUS	24%	38%	58%
RES	6%	5%	3%

Designed Fallout and "Z" Status

* OCN 7125 = 94%, OCN 7680 = 8%

BellSouth's Electronic CLEC Ordering Interfaces Rely Excessively on Manual Processing

Volume of submitted orders directed to the LCSC by failure and design in January 2001 – 64,017 (22% of all electronically submitted orders)

	LENS	TAG	EDI
LNP	-	3,060	11,485
UNE	7,786	5,926	2,629
BUS	5,812	432	563
RES	21,503	3,666	1,155

Orders that fallout are delayed as they wait to be rejected or processed by Service Representatives at the LCSC.

Reject (Auto and Manual Clarification Request) Intervals

	Resale Residence	Resale Business	Resale Special	UNE	Other	Combinations	UNE Loop with LNP	Stand alone LNP
Interval in Minutes Fully Mechanized Orders	8.4	13.2	NA	14.4	31.2	37.2	3.0	15
Interval in Hours Partially Mechanized Orders	12.3	14.8	45.1	30.7	21.6	14.1	36.4	14.6

Firm Order Confirmation (FOC) Intervals

	Resale Residence	Resale Business	Resale Special	UNE	Other	Combinations	UNE Loop with LNP	Stand alone LNP
Interval in Minutes Fully Mechanized Orders	96% < 15	97% < 15	NA	14.4	14.4	28.8	3.6	5.4
Interval in Hours Partially Mechanized Orders	18.2	18.5	51.6	26.4	17.8	19.7	35.7	11.8

Standards: FM Reject = 97% < 1 hour, FM FOC = 95% < 3 hours.

PM Reject or FOC 85% < 18 hours (4/16/01) --- 85% < 10 hours (7/16/01)

Reliance on Manual Processing of Electronically Submitted Orders Has Grown Over Time and BellSouth Has No Meaningful Plans to Reduce Manual Processing

- 16% of electronically submitted orders were routed to manual processing in 1999 – the current rate is 22%
- BellSouth's published initiatives will address only 2,637 (4%) of the 64,017 orders impacted in January 2001.
- Lack of a test environment and the instability of the interfaces and processes continues to limit CLEC ability to compete.

**Other January Operational Performance Results
BellSouth Reported Data**

Measure	Georgia Standard	BST January Performance Report for AT&T	BST Parity if applicable	Key Information to Consider--
OSS				
OSS Response Interval	Parity + 2 seconds	LENS data not available until April		
OSS Availability	99.5%	99.96%		This report has not matched LENS outage report that indicates frequent outages-current exception with KPMG.
Ordering				
Speed of Answer	Parity	CLEC Ctr. 397.74 seconds (or 6.63 minutes)	Retail Bus. 83.92 seconds Retail Res. 15.43 seconds	
Provisioning				
Jeopardy Interval	95% > 48 hours	294.75 hours 12.82 days		Data suspect OCI only 7 days (AT&T investigating))
Avg. Comp Notice	Parity with res & bus	"ADL" no data reported "TCG" 1 order reported UNE-P 3.42 hours	1.63 hours res. 3.01 hours bus.	Measures only fully mechanized—also has severe data discrepancies.
% Troubles in 30 days	Parity- Res & Bus	"TCG" UNE Design 9.94%	Res. 10.18 Bus. 2.98	TCG business loops are compared to residence performance.
Hot Cut Timeliness	95% + or - 15 min of scheduled start time	100% on time		AT&T continues to find data discrepancies—have escalated issue to BST.
LNP Disconnect Timeliness	95% within 15 minutes	"ADL": - 119.20 minutes "TCG" no data reported		ADL Only reported for 4 orders

Other reporting issues:

BellSouth is not yet reporting on new measures, nor new disaggregation and standards ordered by the Georgia PSC.

BellSouth is not providing raw data for LNP measures.

BellSouth is not providing the PON information for its hot cut report, so that AT&T cannot attempt verification.

Customized Routing of OS/DA Calls

- No arrangement routing to a third party OS/DA platform exists in any BellSouth state.
- Ordering procedures for implementing central office translations, trunking and database updates for such arrangements using LCC or AIN have never been published.
- BellSouth's OLNS does not provide routing to third party platforms.
- BellSouth does not have an electronic ordering process for assigning individual customers to CLEC customized OS/DA routing arrangements.

Provisioning Problems

Hot Cut Timeliness and Quality

Hot Cut Procedures

Number Porting

Pre-mature Service Disconnection

Access to multi-dwelling units (MDU)

Post Provisioning Problems

Reassignment of CLEC numbers

Caller ID

Directory Listings

Order Completion Problems

Hot Cut Analysis for January 1 – 12

Georgia Analysis

Total # Time Specific LSRs:	56	
Total Outages During Provisioning:	12	21%
Total Troubles After Completion:	2	4%
	BST/AT&T ICA	
Total On Time¹:	47	84%
Total > 15 Min. Late:	0	0%
Total > 30 Min. Late:	7	13%
Total > 15 Min. Early:	0	0%
Total > 30 Min. Early:	2	4%

Florida Analysis

Total # Time Specific LSRs:	202	
Total Outages During Provisioning:	27	13%
Total Troubles After Completion:	2	1%
	BST/AT&T ICA	
²Total On Time:	167	83%
Total > 15 Min. Late:	3	1%
Total > 30 Min. Late:	14	7%
Total > 15 Min. Early:	3	1%
Total > 30 Min. Early:	15	7%

Notes and Assumptions

- Percent Hot Cuts Started On Time (the BellSouth measure) cannot be calculated using AT&T collected data.
- The following results were calculated using the starting point to be the “TIME STATED ON THE FOC” and the ending point to be “DATE/TIME CLEC NOTIFIED CUT COMPLETE AND ACCEPTANCE TESTING OFFERED”. The Percent Hot Cuts Completed on Time were calculated using the following methodology:
1 to 10 loops should take 1 hour to complete and 11 to 30 loops should take 2 hours to complete.
- The volumes represent orders, not loops. There may be multiple loops per order.
- The data is for Time Specific Hot Cuts only.

¹ The January BellSouth PMAP report shows in Georgia that 100% of the Hot Cuts were started on time.

² The January BellSouth PMAP report shows in Florida that 94.12% of the Hot Cuts were started on time