

passing through BellSouth equipment space. (Redmond Surrebuttal at 8-9.) The collocating CLEC would subsequently submit a Bona Fide Firm Order along with a fee, and pay half of the quoted charges prior to occupying the physical collocation space. The remaining half of the charges would be due within 30 days thereafter.

BellSouth also argued that the cost-based pricing rules apply to UNEs and interconnection service, but that there is no mandate that collocation rates be cost-based. (BellSouth Brief at 9, 42.) BellSouth also criticized AT&T and MCI's collocation model for using assumptions that the model developers did not verify as being valid in Georgia. (BellSouth Brief at 14.)

AT&T/MCI witness Crockett criticized BellSouth's collocation methods and procedures, particularly with respect to the construction of physical collocation space. For example, using wire mesh rather than gypsum as BellSouth proposed would yield substantial cost savings. Mr. Crockett pointed out that a number of ILECs throughout the rest of the country, such as Bell Atlantic, are allowing and already have built collocation enclosures using wire mesh, without any apparent safety or transmission problems. (Crockett Rebuttal at 9.) MGC witness English also testified that physical collocation is accomplished in California (with both GTE and Pac Bell) via a wire cage. (English Direct at 3.)

AT&T and MCI also sponsored a Collocation Model to determine the investment and operating costs that would be incurred by an efficient ILEC to provide collocated space in a central office, using forward-looking technology that is currently available. (MCI Brief at 45-47.) This Collocation Model recognized that it would be most efficient for ILECs to locate space for multiple collocators together, but that large blocks of space are unlikely to be available within a central office or may be located several floors away from the existing ILEC cross-connect systems. AT&T/MCI witness Klick testified that the Collocation Model assumes designing and equipping of a 550-square foot area that would provide four 100-square foot collocation areas. (Klick Direct at 9.)

AT&T/MCI's Collocation Model does not include the costs of retrofitting the central office to meet asbestos removal or ADA (Americans with Disabilities Act) requirements, nor other costs associated with repairing or remodeling existing building space, on the basis that such costs would not be consistent with the forward-looking, least-cost approach. Its "Central Office Model Layout" assumes the central office is equipped with an automated security card reading system. The investment required to construct the collocation space was separated into three categories: (1) assets shared by the four potential CLEC collocators and the ILEC; (2) assets shared by the four potential collocators but not the ILEC; and (3) assets used exclusively by one CLEC. The total cost for collocation space depends upon the requirements for elements such as connectivity, usage of power, and number of cages required by a CLEC at a particular location. For example, a CLEC may request a combination of copper connectivity such as voice grade and DS-1 (DSX), or only voice grade service. Mr. Klick testified that it would be inaccurate to sum all of the recurring costs to arrive at a grand total, because several alternative costs are presented for elements such as Power Delivery and Circuitry. He presented the results of the Collocation Model for Georgia as a printout in his Exhibit

JCK-2, and the electronic version of the model itself on diskette as his Exhibit JCK-3. (Klick Direct at 9-11.)

MCI criticized BellSouth's proposed collocation rates as overstated and inflated, creating a barrier to new entrants attempting to enter the local market. MCI cited the example of MGC, whose witness Michael English submitted prefiled testimony that was stipulated into evidence. MGC was quoted \$317,221 in NRCs by BellSouth for collocation in three central offices, half of which must be paid up front before the collocation build-out begins. (MCI Brief at 47, citing English Testimony at 3.) MCI also specifically criticized proposal to construct collocation space using middle stud and drywall construction with space at the top and base of each wall for ventilation. MCI asserted that the use of metal cage materials would provide a considerably less costly, flexible, and more consistent ambient environment for physical collocation, and provide other benefits such as appropriate grounding requirements, and increased security due to increased visibility. MCI added that physical collocation areas established in other territories incorporate the use of wire mesh cages with lighting, AC/DC power, required heating, ventilation and air conditioning ("HVAC"), and grounding. (MCI Brief at 48, citing Crockett Direct at 11-12.) MCI further argued that the use of drywall requires additional unnecessary processes and costs, and that BellSouth's proposed materials costs were excessive. MCI charged that it seeks a spartan but practical collocation space, but that BellSouth would insist on charging for a "luxury collocation condo." (MCI Brief at 48-50.)

BellSouth argued that the Collocation Model sponsored by AT&T and MCI is inconsistent with BellSouth's obligations under the FCC's collocation rules, contains unreasonable assumptions designed to "wish away" the legitimate costs incurred to fulfill a collocation request by a CLEC, and is unreliable given that even AT&T and MCI are unsure what BellSouth should build out even if it were to follow the model. (BellSouth Brief at 45.)

BellSouth witness Redmond disagreed with several aspects of the Collocation Model sponsored by AT&T and MCI. She described it as assuming a new urban central office designed for up to 150,000 lines, with 36,000 square feet in the form of three 12,000-square foot equipment floors plus a below-ground cable vault. In addition there would be 3,000 square feet on each floor, and an entire basement, for building support and administrative offices. This would equate to 15,000 square feet for four floors totaling 60,000 gross square feet. She noted that the model proponents maintain that such an office is consistent with facilities that have been constructed within the past five years. (Redmond Surrebuttal at 3-4.)

Ms. Redmond argued that such a model central office is not a realistic representation of BellSouth urban central offices, stating that no new urban central offices have been built in Georgia in over five years. She stated that BellSouth urban central offices are typically very large facilities that were built when telecommunications switches required greater footprints of floor space. Installation of today's more space-efficient switches does free up large amounts of space, but as large pockets of space have come available that space has been renovated for use as administrative offices. Ms. Redmond explained that BellSouth's method of planning physical collocation space differs from

the Collocation Model sponsored by AT&T and MCI. (Redmond Surrebuttal at 5-6; BellSouth Brief at 43-44.)

In particular, Ms. Redmond argued that the Collocation Model is not practical for real collocation arrangements for various reasons. She testified that only a very few CLECs, to date, have placed Bona Fide Firm Orders for physical collocation arrangements of 100 square feet (18.4 percent). She recognized that the model could easily be converted to two 10-foot by 20-foot cages with a center aisle, allowing for another 44.9 of the CLECs, but asserted that the model would not work for the remaining 36.7 percent of the collocators at all. Ms. Redmond also asserted that the model's placement of the POT bay and BDFB's in the center aisle is not practical. BellSouth believes that one large, commonly shared collocation space is more practical and economical for such reasons as the sharing of HVAC, lighting, alarms, controls, electrical distribution, etc. Therefore BellSouth concludes that the facilities and the spaces within them are so unique that individual planners should carefully evaluate each facility upon inquiry, for the best overall plan. (Redmond Surrebuttal at 6-7.)

Ms. Redmond also testified that out of 191 central offices in Georgia, only 45 have electronic security card systems as the Collocation Model assumes, because they cost \$10,000 per door. This is why placing collocation areas in space where ingress / egress renovations are minimal is very important to BellSouth's planning process. (Redmond Surrebuttal at 9.)

In addition, whereas the Collocation Model refers to competitive bidding for reducing construction costs, BellSouth does not bid collocation projects because that would unduly lengthen the time frame for meeting a Bona Fide Firm Order for physical collocation. Contracts with several CLECs and at least one state commission provide that this time frame will be as short as 90 days maximum; therefore, Ms. Redmond stated, projects to construct physical collocation arrangements must be negotiated with general contractors under a BellSouth master agreement. She explained that samples of projects below \$100,000 were submitted to multiple contractors in Florida, Louisiana, North Carolina and South Carolina for bids. The result was the guarantee of cost plus a percentage lower than standard for jobs of this size on negotiated projects below \$100,000. This figure was then used to negotiate the same deal with contractors in the other five BellSouth states, including Georgia. Projects of over \$100,000 are always bid unless time is a factor, in which case the project will be negotiated under the cost-plus agreement just mentioned. When time is a factor in very large projects (for example, one million dollars), the master agreement includes negotiating the cost-plus fee down as low as 4 percent. BellSouth believes that this process is cost-efficient and provides assurance, through repetition with a small number of contractors, a technical proficiency for working in BellSouth facilities. (Redmond Surrebuttal at 9-11.)

Ms. Redmond also took issue with AT&T and MCI's use of the R.S. Means data book for building construction costs. She agreed that it is perhaps the best estimating tool of its type on the market, but cautioned that it must be used in the proper context. Using a "mean" number when estimating can be misleading and can be skewed from reality, she testified; although BellSouth uses the R.S. Means occasionally, it does so only when data from previous jobs or from contractor

invoices and estimates are not available. (Redmond Surrebuttal at 12.) Ms. Redmond also criticized the AT&T/MCI approach to barriers and enclosure walls, and testified that BellSouth must use precautionary measures during construction and ensure safety through the placement of a gypsum board wall with rigid security fencing at the top to separate BellSouth equipment spaces from collocators' equipment spaces. BellSouth will use the same wall, minus the security fencing, to separate the collocators from each other when an enclosure is requested. Ms. Redmond specifically criticized the use of wire mesh fencing on the basis that it would be too easy for a maintenance worker to contact the wire fence. Further, she argued that CLECs should bear such costs as those associated with the Americans with Disabilities Act, demolition and asbestos removal when necessary, code-required upgrades, etc. Ms. Redmond concluded that the construction and the costs represented by BellSouth's estimates are fair and reasonable, and will compensate BellSouth for the legitimate expenses incurred when preparing space for physical collocation. (Redmond Surrebuttal at 14-16, 17-20.)

The Staff noted that BellSouth's cost proposal for the construction of space enclosures is \$45 per square foot. However, for space preparation BellSouth proposed an Individual Case Basis ("ICB"), which the Staff submitted is an obstacle to competition because it introduces unnecessary uncertainty into the process of obtaining physical collocation. This represents a significant economic barrier to physical collocation, and ultimately facilities-based competition. Both the Georgia Act and the 1996 Act indicate strong legislative goals of fostering greater competition, especially facilities-based competition. On the other hand, the AT&T/MCI Collocation Model assumes that the CLEC will not bear any space preparation charge, which does not appear to be reasonable. Therefore the Staff recommended that a specific, albeit reasonable charge be adopted for space preparation in order to encourage physical collocation.

In order to develop a reasonable space preparation charge on a per-foot basis, the Staff reviewed the actual experience of a CLEC, specifically MGC. MGC witness English, President of MGC's eastern region, presented testimony showing that the combined cost for space preparation for three Atlanta metropolitan locations (Buckhead, Dunwoody, and Sandy Springs) total \$317,221. Thus the average space preparation fee per location is \$105,740. (English Direct at 3.) BellSouth's collocation agreements on file with the Commission reflect that MGC has purchased 100 square feet per central office. This yields an average cost of \$1057.40 per square foot for space preparation. The Staff concluded that a reasonable specific charge of \$100 per square foot should be adopted for space preparation, and that this would be in line with BellSouth's \$45 per square foot charge for space enclosure construction. The Staff's proposed \$100 per square foot space preparation charge would be correlated to the actual enclosed collocation space. When a CLEC submits an application for physical collocation, the initial minimum amount of space would be 100 square feet, and extra space would be calculated in 50-square foot increments.

The Staff also recommended that a CLEC be able to construct a wire cage, at the CLEC's option. Therefore a CLEC should not be limited to the gypsum (plywood) as proposed by BellSouth. The Staff stated that the same rates should apply to either the wire cage or gypsum (plywood).

Discussion

The Commission agrees that approving a specific price of \$45 per square foot for the construction of space enclosures, but allowing an Individual Case Basis ("ICB") for space preparation would be an obstacle to competition because it introduces unnecessary uncertainty into the process of obtaining physical collocation. This represents a significant economic barrier to physical collocation, and ultimately facilities-based competition. Both the Georgia Act and the 1996 Act indicate strong legislative goals of fostering greater competition, especially facilities-based competition. The Commission agrees that a specific, albeit reasonable charge should be adopted for space preparation to encourage physical collocation.

The Commission notes BellSouth's argument that the cost-based pricing rules of Section 252(d) do not apply to collocation. However, Section 251(c)(6) provides that collocation be provided at rates, terms, and conditions that are just, reasonable, and nondiscriminatory. Allowing collocation rates that are reasonably based upon cost will be consistent with this statutory mandate.

The Commission has reviewed the Staff's approach to developing a reasonable, per-square foot space preparation charge, and finds it just, reasonable, and nondiscriminatory. The Commission concludes that \$100 per square foot is a reasonable specific charge for space preparation, which also comports with BellSouth's \$45 per square foot charge for space enclosure construction. The \$100 per square foot space preparation charge must be correlated to the actual enclosed collocation space. When a CLEC submits an application for physical collocation, the initial minimum amount of space should be 100 square feet, and extra space should be calculated in 50-square foot increments.

A collocating CLEC shall be permitted to have a wire cage, at the CLEC's option. Therefore a CLEC should not be limited to the gypsum (plywood) alternative, although the same rates should apply to either the wire cage or gypsum (plywood).

D. Rates for Access to Poles, Ducts, Conduits, and Rights-of-Way

Most of the parties focused more attention on other aspects of this proceeding than on the rates for access to poles, ducts, conduits, and rights-of-way. However, they generally recognized that the FCC has established formulas for computing such rates in an appropriate manner. The FCC rate for pole rental is currently \$4.20 per year. BellSouth submitted information on its computations supporting a higher rate (up to approximately \$20), but indicated that it would not seek approval for such a higher rate at this time. The Staff recommended that the Commission adopt the current rate according to the FCC formula, which produces a pole rental rate of \$4.20.

The Cable Television Association of Georgia ("CTAG") criticized BellSouth's proposed rates on the basis that they advance two inherently contradictory positions regarding pole attachments and other rights-of-way. On the one hand, stated CTAG, BellSouth proposed that rates currently in effect in numerous license agreements and interconnection agreements be used as permanent rates. (CTAG

Brief at 1, citing BST witness Scheye Direct at 18, Tr. 95.) However, BellSouth also proposed that, pending completion of the FCC rulemaking on pole attachments,²¹ the Commission may designate new rates and that this potential change in rates could be defined in the Commission's order. (Scheye Direct at 19, Tr. 96.) BellSouth's cost study calculated a recurring annual cost of \$20.46 per foot for access to poles, \$0.56 per foot for access to conduit, and \$0.44 per foot for access to inner duct. The CTAG pointed out that BellSouth's proposed cost calculations suggest an increase of 387 percent over BellSouth's current tariffed rates for access to poles at \$4.20 per foot per year, according to the FCC's formula. (CTAG Brief at 2.) The CTAG cited the testimony of Ms. Kravtin who calculated two different sets of cost results to compare with the BellSouth analysis, both of which resulted in dramatically lower cost calculations. (CTAG Brief at 7-9, citing Kravtin Testimony at 22-29, Tr. 2247-2254.)

According to the CTAG, BellSouth's cost study contained several errors in input assumptions underlying the calculation of usable and non-usable space on the pole. The CTAG contended that there is no basis in support of these key input assumptions. Moreover, the CTAG argued that BellSouth's attribution of unusable space directly conflicts with Section 224(e)(2)(3) of the 1996 Act, which provides that "a utility shall apportion the cost of providing space on a pole, duct, conduit, or right-of-way other than the usable space among entities so that such apportionment equals two-thirds of the costs of providing space other than the usable space that would be allocated to such entity under an equal apportionment of such costs among all attaching entities." The CTAG stated that BellSouth's cost study improperly apportioned 100 percent of the costs of unusable space among attaching entities, and furthermore would revise the costs prior to the FCC's planned schedule. The BellSouth formula also differs from the FCC's proposed pole attachment formula with respect to the 40 inches of safety space required under the National Electric Safety code ("NESC Clearance") as unusable space. (CTAG Brief at 4-7.)

The CTAG urged the Commission to continue to rely on the rates and terms established according to the FCC formula, rather than adopt the rates suggested by the BellSouth cost study. This formula has stood the test of time, the CTAG argued, conforms with the mandates of the 1996 Act, and promotes competition, as will any successor FCC formula that becomes applicable. (CTAG Brief at 10-11.) The FCC's current formula in setting the maximum rate for pole attachments multiplies the net (investment) cost of a bare pole by the percentage of usable space that an attachment occupies on an average pole (*i.e.*, the ratio of space occupied by the attachment to total usable space on the pole). Total usable space on the pole is defined as the space on the utility pole above the minimum grade level that is usable for the attachment of lines, cables, and related equipment. The FCC has developed over the years a number of presumptions used in the formula's calculation, including the ratio of space occupied by the attachment to total usable space, which is

²¹ Mr. Scheye's direct testimony (at 19) referenced the FCC's Notice of Proposed Rulemaking (NPRM) issued March 14, 1997 (CS Docket 97-98); Tr. 96. The FCC subsequently issued a NPRM on August 12, 1997 in CS Docket 97-151 regarding pole attachment matters incorporated by reference the comments filed in response to the NPRM cited by Mr. Scheye.

the key determining factor of the maximum rate. (CTAG Brief at 2-3, citing Kravtin Rebuttal at 8, Tr. 2233, and FCC NPRM, CS Docket 97-98, March 14, 1997, at ¶ 8 citing 47 C.F.R. § 1.14004, and FCC NPRM, CS Docket 97-151, August 12, 1997, at ¶ 16 citing Second Report and Order, 72 FCC at 69, 47 C.F.R. § 1.1402(c).) The CTAG concluded that the matter of pole attachment costs is most efficiently and fairly dealt with by the FCC, but if the Commission takes jurisdiction over pole attachment costs, that it should reject BellSouth's faulty analysis and instead adopt a formula and underlying input values that are fully consistent with those adopted by the FCC.

Discussion

The Commission concludes that it is most appropriate to adopt the current pole rental rate according to the FCC formula, which produces a rate of \$4.20 per foot per year. The Commission is cognizant that the FCC is reviewing potential revisions to the current pole attachment formula applicable to telecommunications carriers, pursuant to the 1996 Act, and released a NPRM on August 12, 1997 in CS Docket 97-151 proposing revisions that would permit the incumbent LEC to apportion costs among attaching entities so that each entity is allocated two-thirds of the amount it would be allocated under an equal apportionment of the costs of usable space among all entities attaching. The revisions are not to become effective until February 8, 2001, and any subsequent increases in rates for pole attachments would be phased in with equal annual increments over a period of five years. In the meantime, the current FCC formula has proven to be a reasonable, cost-based approach to setting pole rates.

The Commission accepts the remaining rates proposed in this docket by BellSouth with respect to access to poles, ducts, conduits, and rights-of-way. However, the Commission notes that the rate for dark fiber as an unbundled network element must be charged on a per-foot basis, and not limited to charging on a per-mile basis, consistent with the Commission's previous rulings (*e.g.* Dockets No. 6801-U and 6865-U) regarding rate design for this element.

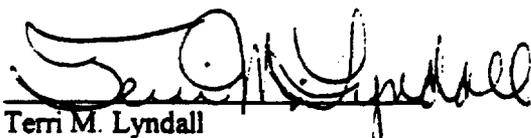
IV. CONCLUSION AND ORDERING PARAGRAPHS

The Commission finds and concludes that the rates, terms and conditions as discussed in the preceding sections of this Order should be adopted for the interconnection with and unbundling of BellSouth's telecommunications services in Georgia, pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 and Georgia's Telecommunications and Competition Development Act of 1995. These will result in a balanced set of rates and charges for BellSouth's interconnection including collocation, unbundled network elements, and access to poles, ducts, conduits, and rights-of-way.

WHEREFORE THE COMMISSION ORDERS that:

- A. The cost-based rates determined by the Commission in the preceding sections of this Order, and set forth in the Price Schedule in Appendix A hereto, are established as the rates for BellSouth's interconnection, collocation, access to poles, ducts, conduits, and rights-of-way, and unbundled network elements. BellSouth shall submit such compliance filings as are necessary to reflect and implement the rates established by this Order.
- B. Following its implementation of long-term electronic interfaces for OSS functions that were scheduled for the end of December 1997, BellSouth shall submit a detailed report of its electronic interface costs for the Commission's review.
- C. All statements of fact, law, and regulatory policy contained within the preceding sections of this Order are hereby adopted as findings of fact, conclusions of law, and conclusions of regulatory policy of this Commission.
- D. A motion for reconsideration, rehearing or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.
- E. Jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 21st day of October, 1997.


Terri M. Lyndall
Executive Secretary


Stan Wise
Chairman

December 16, 1997
Date

12-16-97
Date

GEORGIA PUBLIC SERVICE COMMISSION		DOCKET NO. 7061-J - APPENDIX A TO ORDER ESTABLISHING COST-BASED RATES (ISSUED DECEMBER 16, 1997)									
Code Element		Recurring	Non Recurring	First	Non-Additional	Initial	Subsequent				
A.0	Unbundled Local Loop										
A.1	2-Wire Analog Voice Grade Loop										
A.1.1	2-Wire Analog Voice Grade Loop - Service Level 1	\$16.51		\$42.54	\$31.33						
A.1.2	2-Wire Analog Voice Grade Loop - Service Level 2	\$19.57		\$104.17	\$76.10						
A.1.3	2-Wire Analog Voice Grade Loop - Service Level 1 - Manual Order Coordination			\$38.48	\$36.48						
A.1.4	2-Wire Analog Voice Grade Loop - Service Level 1 - Order Coordination for Specified Conversion Time			\$34.22							
A.1.5	2-Wire Analog Voice Grade Loop - Service Level 2 - Order Coordination for Specified Conversion Time			\$34.22							
A.2	Sub-Loop 2-Wire Analog										
A.2.1	Loop Feeder Per 2-Wire Analog Voice Grade Loop	\$6.58		\$208.44	\$170.05						
A.2.2	Loop Distribution Per 2-Wire Analog Voice Grade Loop	\$9.12		\$207.01	\$171.32						
A.2.3	Loop Concentration - Channelization System - (Outside C.O.)	\$313.11		\$651.23	\$284.99						
A.2.4	Loop Concentration - Remote Terminal Cabinet (Outside C.O.)	ICB									
A.2.5	Loop Concentration - Remote Channel Interface - 2-Wire Voice Grade (Outside C.O.)	\$0.8636		\$9.41	\$9.36						
A.2.6	ND Per 2-Wire Analog Voice Grade Loop	\$1.10		\$2.10	\$2.10						
A.2.7	Loop Concentration - Channelization System - Incremental Cost - Manual Svc Order vs. Electronic			\$18.94	\$6.42						
A.2.8	Sub-Loop Feeder - Order Coordination for Specified Conversion Time			\$34.22							
A.2.9	Sub Loop Distribution - Order Coordination for Specified Conversion Time			\$34.22							
A.3	Loop Channelization and Co-Interface (Inside CO)										
A.3.1	Loop Channelization System - Digital Loop Carrier	\$281.76		\$306.13	\$79.33						
A.3.2	CO Channel Interface - 2-Wire Voice Grade	\$0.8016		\$20.87	\$20.74						
A.3.3	Loop Concentration - Channelization System - Incremental Cost - Manual Svc Order vs. Electronic			\$18.94	\$6.42						
A.4	4-Wire Analog Voice Grade Loop										
A.4.1	4-Wire Analog Voice Grade Loop	\$25.86		\$208.85	\$170.57						
A.4.2	ND Per 4-Wire Analog Voice Grade Loop	\$1.21		\$2.10	\$2.10						
A.4.3	4-Wire Analog Voice Grade Loop - Order Coordination for Specified Conversion Time			\$34.22							
A.5	2-Wire ISDN Digital Grade Loop										
A.5.1	2-Wire ISDN Digital Grade Loop	\$25.43		\$233.36	\$180.35						
A.5.2	ND Per 2-Wire ISDN Digital Grade Loop	\$1.10		\$2.10	\$2.10						
A.5.3	2-Wire ISDN Digital Grade Loop - Order Coordination for Specified Conversion Time			\$34.22							
A.6	2-Wire Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop										
A.6.1	2-Wire Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop	\$13.06		\$359.73	\$325.15						
A.6.2	ND Per 2-Wire Asymmetrical Digital Subscriber Line (ADSL) Loop	\$1.10		\$2.10	\$2.10						

Cost Element					Recurring	Non Recurring	Final	Non-Recurring Additional	Incl	Subsequent
B.1.14	Exchange Ports - 4-Wire SDN DS1 Port - Incremental Cost - Manual Svc Order vs. Electronic						\$37.88	\$37.88		
B.1.15	Exchange Ports - 2-Wire Analog Line Port (RBY) - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$8.42		
B.1.16	Exchange Ports - Cdn Port - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$8.42		
C.9	Unbundled Switching and Local Interconnection									
C.1	Local Switching									
C.1.1	End Office Switching Function, Per MOU				\$0.0018333					
C.1.2	End Office Interoffice Trunk Port - Shared, Per MOU				\$0.0001584					
C.2	Tandem Switching									
C.2.1	Tandem Switching Function Per MOU				\$0.0008757					
C.2.2	Tandem Interoffice Trunk Port - Shared, Per MOU				\$0.0002128					
D.9	Unbundled Transport and Local Interconnection									
D.1	Common Transport									
D.1.1	Common Transport - Per Mile, Per MOU				\$0.0000090					
D.1.2	Common Transport - Facilities Termination Per MOU				\$0.0004152					
D.2	Interoffice Transport - Dedicated - Voice Grade									
D.2.1	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Per Mile				\$0.0222					
D.2.2	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Facility Termination				\$17.07		\$79.61	\$38.08		
D.2.3	Interoffice Transport - Voice Grade - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$18.94		
D.3	Interoffice Transport - Dedicated - DS0 - 9944/998									
D.3.1	Interoffice Transport - Dedicated - DS0 - Per Mile				\$0.0222					
D.3.2	Interoffice Transport - Dedicated - DS0 - Facility Termination				\$18.45		\$79.81	\$38.08		
D.3.3	Interoffice Transport - DS0 - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$18.94		
D.4	Interoffice Transport - Dedicated - DS1									
D.4.1	Interoffice Transport - Dedicated - DS1 - Per Mile				\$0.4523					
D.4.2	Interoffice Transport - Dedicated DS1 - Facility Termination				\$79.47		\$147.07	\$111.75		
D.4.3	Interoffice Transport - DS1 - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$18.94		
D.6	Local Channel - Dedicated									
D.5.1	Local Channel - Dedicated - 2-Wire Voice Grade				\$13.91		\$382.95	\$82.40		
D.5.2	Local Channel - Dedicated - 4-Wire Voice Grade				\$14.98		\$398.44	\$84.05		
D.5.3	Local Channel - Dedicated - DS1				\$38.35		\$358.15	\$312.89		
D.5.4	Local Channel - Dedicated 2-Wire Voice Grade - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$8.42		
D.5.5	Local Channel - Dedicated 4-Wire Voice Grade - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$8.42		
D.5.6	Local Channel - Dedicated - DS1 - Incremental Cost - Manual Svc Order vs. Electronic						\$44.22			
E.9	Signaling Network, Data Bases & Service Management Sys.									

Cost Element					Recurring	Non-Recurring	First	Additional	Initial	Subsequent
E.1	800 Access Ten Digit Screening									
E.1.1	800 Access Ten Digit Screening, Per Call				\$0.0004068					
E.1.2	800 Access Ten Digit Screening, Reservation Charge Per 800 Number Reserved						\$6.57	\$1.76		
E.1.3	800 Access Ten Digit Screening, Per 800 # Established W/O POTS Translations						\$12.81	\$1.45		
E.1.4	800 Access Ten Digit Screening, Per 800 # Established With POTS Translations						\$12.81	\$1.45		
E.1.5	800 Access Ten Digit Screening, Customer Area of Service Per 800 Number						\$4.46	\$2.23		
E.1.6	800 Access Ten Digit Screening, Multiple Int'lATA CRR Routing Per CRR Requested Per 800 #						\$5.22	\$2.99		
E.1.7	800 Access Ten Digit Screening, Change Charge Per Request						\$7.33	\$0.76		
E.1.8	800 Access Ten Digit Screening, Call Handling and Distribution Features						\$4.72			
E.1.9	800 Access Ten Digit Screening, Reserve Chng Per 800 # Reserved-Intern Cost-Manual Svc Order vs. Electr						\$18.94			
E.1.10	800 Access Ten Digit Screening, Reserve Chng Per 800 # Reserved-Intern Cost-Manual Svc Order vs. Electr						\$18.94			
E.1.11	800 Access Ten Digit Screening, Per 800 # Estd With POTS Transl.-Intern Cost-Manual Svc Order vs. Electronic						\$18.94			
E.1.12	800 Access Ten Digit Screening, Chng Chg/Request-Intern Cost-Manual Svc Order vs. Electronic						\$18.94			
E.2	Line Information Data Base Access (LDB)									
E.2.1	LDB Common Transport Per Query				\$0.0000038					
E.2.2	LDB Validation Per Query				\$0.0105974					
E.2.3	LDB Originating Point Code Establishment or Change						\$50.30			
E.2.4	LDB Incremental Cost-Manual Svc Order vs. Electronic						\$18.94			
E.3	CCS7 Signaling Transport									
E.3.1	CCS7 Signaling Connection, Per Sdngrn Facility				\$17.05		\$131.99			
E.3.2	CCS7 Signaling Termination, Per STP Pool				\$133.99					
E.3.3	CCS7 Signaling Usage, Per Call Setup Message				\$0.0000054					
E.3.4	CCS7 Signaling Usage, Per TCAP Message				\$0.0000070					
E.3.5	CCS7 Signaling Usage Summary, Per Sdngrn Facility, Per LATA Per Month				\$340.97					
E.3.6	CCS7 - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94			
F.0	Operational Support Systems (Account Establishment Charge)						\$200.00			
F.1	Operational Support Systems									
F.1.1	OSS Electronic Interface, Per Final 1,000 Orders				\$500.00					
F.1.2	OSS Electronic Interface, Next 1,000 Orders				\$110.00					
G.0	Operator Services and Directory Assistance									
G.1	Operator Call Processing									
G.1.1	Oper. Call Processing - Oper. Provided Cost Per Min. - Using BST LDB				\$0.8690296					
G.1.2	Oper. Call Processing - Oper. Provided Cost Per Min. - Using Foreign LDB				\$1.02					
G.1.3	Oper. Call Processing - Fully Automated Cost Per Call - Using BST LDB				\$0.0776499					
G.1.4	Oper. Call Processing - Fully Automated Cost Per Call - Using Foreign LDB				\$0.0976994					
G.1.5	Loading Expense Per Announcement For Branded Announcement								\$253.87	\$253.87
G.1.6	Recording Expense Per Announcement For Branded Announcement								\$17.54	\$15.43

Cost Element				Recurring	Non Recurring	First	Non-Recurring Additional	Initial	Subsequent
H.1.2	Physical Collocation - Space Preparation (minimum 100 sq. ft./Additional space is calculated in 50sq.ft. increments)					\$100.00 per sq. ft.			
H.1.3	Physical Collocation - Space Construction Cost Per Sq. Ft.					\$45.00			
H.1.5	Physical Collocation - Cable Installation Cost Per Cable					\$2,750.00			
H.1.6	Physical Collocation - Floor Space, Per Sq. Ft. - Zone A			\$7.50					
H.1.7	Physical Collocation - Floor Space, Per Sq. Ft. - Zone B			\$6.75					
H.1.7	Physical Collocation - Cable Support Structure, Per Entrance Cable			\$19.35					
H.1.8	Physical Collocation - Power, Per Ampere			\$5.00					
H.1.9	Physical Collocation - 2-Wire Cross Connects			\$0.30		\$12.00/\$12.00			
H.1.10	Physical Collocation - 4-Wire Cross Connects			\$0.50		\$12.00/\$12.00			
H.1.11	Physical Collocation - D61 Cross Connects			\$8.00		\$155.00/\$27.00			
H.1.12	Physical Collocation - D63 Cross Connects			\$72.00		\$155.00/\$27.00			
H.1.13	Physical Collocation - 2-Wire POT Bay			\$0.40					
H.1.14	Physical Collocation - 4-Wire POT Bay			\$1.20					
H.1.15	Physical Collocation - D61 POT Bay			\$1.20					
H.1.16	Physical Collocation - D63 POT Bay			\$8.00					
H.1.17	Physical Collocation - Security Escort - Basic, Per Half-Hour and Additional					\$41.00/\$25.00			
H.1.18	Physical Collocation - Security Escort - Overlms, Per Half-Hour and Additional Half-Hour					\$48.00/\$30.00			
H.1.19	Physical Collocation - Security Escort - Premium, Per Half-Hour and Additional Half-Hour					\$55.00/\$35.00			
H.2	Virtual Collocation								
H.2.1	Virtual Collocation - Application Cost					\$2,848.30			
H.2.2	Virtual Collocation - Cable Installation Cost Per Cable					\$2,750.00			
H.2.3	Virtual Collocation - Floor Space Per Sq. Ft.			\$3.20					
H.2.4	Virtual Collocation - Floor Space Power, Per Ampere			\$3.48					
H.2.5	Virtual Collocation - Cable Support Structure, Per Entrance Cable			\$13.35					
H.2.6	Virtual Collocation - 2-Wire Cross Connects								
H.2.7	Virtual Collocation - 4-Wire Cross Connects			\$7.50		\$155.00/\$14.00			
H.2.8	Virtual Collocation - D61 Cross Connects			\$66.25		\$151.00/\$11.83			
H.2.9	Virtual Collocation - D63 Cross Connects			\$41.00/\$25.00					
H.2.10	Virtual Collocation - Security Escort - Basic, Per Half Hour					\$48.00/\$30.00			
H.2.11	Virtual Collocation - Security Escort - Overlms, Per Half Hour					\$55.00/\$35.00			
H.2.12	Virtual Collocation - Security Escort, Premium, Per Half Hour								
L6	Service Provider Number Portability								
L1	Service Provider Number Portability - RCF								
L1.1	Service Provider Number Portability - RCF, Per Number Ported			\$2.03		\$0.51			
L1.2	Service Provider Number Portability - RCF, Per Additional Path			\$0.2838					
L1.3	Service Provider Number Portability - RCF, Per Service Order, Per Location					\$2.10	\$2.10		
L2	Service Provider Number Portability - DID								
L2.1	Service Provider Number Portability - DID, Per Number Ported, Residence					\$0.93			
L2.2	Service Provider Number Portability - DID, Per Number Ported, Business					\$0.93			
						Non	Non-Recurring		

Cost Element					Recurring	Recurring	First	Additional	Initial	Subsequent
I.2.3	Service Provider Number Portability - DID, Per Service Order, Per Location						\$2.10	\$2.10		
I.2.4	Service Provider Number Portability - DID, Per Trunk Termination, Initial				\$10.73	\$135.47				
I.2.5	Service Provider Number Portability - DID, Per Trunk Termination, Subsequent				\$10.73	\$39.53				
I.3	Service Provider Number Portability - Manual Svc Order vs. Electronic									
I.3.1	Service Provider Number Portability - Incremental Cost - Manual Svc Order vs. Electronic						\$18.94	\$18.94		
J.0	Other									
J.1	Dark Fiber									
J.1.1	Dark Fiber, Per Four Fiber Strands, Per Route Mile or Fraction Thereof				\$44.22		\$1,353.29	\$273.69		
J.2	Access to Poles, Ducts, Conduits and Rights of Way									
J.2.1	Access to Poles Per Pole, Per Foot, Per Year				\$4.20					
J.2.2	Access to Conduits, Per Foot, Per Year				\$0.60195320					
J.2.3	Access to Innerduct, Per Foot, Per Year				\$0.4195351					
K.0	Advanced Intelligent Networks (AIN) Services									
K.1	BellSouth AIN SMS Access Services									
K.1.1	AIN SMS Access Service - Service Establishment, Per State, Initial Setup					\$80.25				
K.1.2	AIN SMS Access Service - Port Connection - Dedicated Access					\$29.66				
K.1.3	AIN SMS Access Service - Port Connection - BDN Access					\$29.66				
K.1.4	AIN SMS Access Service - User Identification Codes - Per User ID Code					\$84.43				
K.1.5	AIN SMS Access Service - Security Card, Per User ID Code, Initial or Replacement					\$35.44				
K.1.6	AIN SMS Access Service - Storage, Per Unit (100 Kilobytes)				\$0.0023					
K.1.7	AIN SMS Access Service - Session, Per Minute				\$0.0795904					
K.1.8	AIN SMS Access Service - Company Performed Session, Per Minute				\$2.06					
K.2	BellSouth AIN Teleshift Services									
K.2.1	AIN Teleshift Service - Service Establishment Charge, Per State, Initial Setup					\$86.74				
K.2.2	AIN Teleshift Service - Training Session, Per Customer					\$8,348.00				
K.2.3	AIN Teleshift Service - Trigger Access Charge, Per Trigger, Per DN, Term, Attempt					\$19.13				
K.2.4	AIN Teleshift Service - Trigger Access Charge, Per Trigger, Per DN, Off-Hook Delay					\$114.80				
K.2.5	AIN Teleshift Service - Trigger Access Charge, Per Trigger, Per DN, Off-Hook Immediate					\$19.13				
K.2.6	AIN Teleshift Service - Trigger Access Charge, Per Trigger, Per DN, 10-Digit POOP					\$70.06				
K.2.7	AIN Teleshift Service - Trigger Access Charge, Per Trigger, Per DN, COP					\$70.06				
K.2.8	AIN Teleshift Service - Trigger Access Charge, Per Trigger, Per DN, Feature Code					\$70.06				
K.2.9	AIN Teleshift Service - Query Charge, Per Query				\$0.0206223					
K.2.10	AIN Teleshift Service - Type 1 Needs Charge, Per AIN Teleshift Subscription, Per Needs, Per Query				\$0.0053137					
K.2.11	AIN Teleshift Service - SCP Storage Charge, Per SMS Access Account, Per 100 Kilobytes				\$1.48					
K.2.12	AIN Teleshift Service - Monthly Report - Per AIN Teleshift Service Subscription				\$15.96	\$22.64				
K.2.13	AIN Teleshift Service - Special Study - Per AIN Teleshift Service Subscription				\$0.0661109	\$22.64				
K.2.14	AIN Teleshift Service - Call Event Report - Per AIN Teleshift Service Subscription				\$15.87	\$22.64				Non-Recurring

Cost Element					Recurring	Recurring	First	Additional	Initial	Subsequent
K.2.15	ARN Testkit Service - Call Event Special Study - Per ARN Testkit Service Subscription				\$0.0028704	\$22.64				

APPENDIX C

APPENDIX C

**Docket No. 7892-U Performance Measures For
Telecommunications Interconnection,
Unbundling and Resale Order(s) (January 16,
2001 and May 7, 2001)**

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EXECUTIVE SECRETARY
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ORDER

In re: Performance Measurements For Telecommunications Interconnection, Unbundling
And Resale

BY THE COMMISSION:

This matter comes before the Georgia Public Service Commission ("Commission") to establish generic performance measurements for BellSouth Telecommunications, Inc., for interconnection, unbundling and resale and to establish appropriate enforcement mechanisms for those performance measurements.

I. INTRODUCTION

A. Background

This Commission first held hearings in this docket in November 1997, and has required BellSouth to submit performance reports since May 1998. The purpose of these reports was to assist the Commission and the parties in determining whether BellSouth provides nondiscriminatory service to CLECs. BellSouth's Service Quality Measurements ("SQM") originated in 1998 as the result of the Commission's decision in Docket No. 7892-U. Since the Commission issued its order in May 1998, the Federal Communications Commission ("FCC") has stated more definitively its requirements for an adequate performance measurement plan. In addition, the parties have had the time to observe the Georgia plan in action, test its effectiveness, and identify many of its strengths and weaknesses.

The Commission initiated this phase of this Docket with a Procedural and Scheduling Order issued on June 8, 2000. The Scheduling Order stated that the purpose of this proceeding was to establish performance measurements, and to establish appropriate enforcement mechanisms for those

performance measurements, for telecommunications interconnection, unbundling and resale. Given the more extensive experience available since the 1997 hearings, the Commission initiated this new phase to refine and upgrade the set of performance measures so that it will more clearly reveal whether BellSouth is adequately opening its market to competition on a nondiscriminatory basis and to adopt a complete remedies plan that will provide adequate consequences should BellSouth fail to meet the standards.

Hearings were held before the Commission on July 5-7, 2000. Briefs were filed by BellSouth and the CLEC Coalition (AT&T Communications of the Southern States, Inc., Broadslate Networks, Inc., DIECA Communications, Inc. d/b/a Covad Communications Company, ICG Telecom Group, Inc. and Intermedia Communications, Inc., ITC^DeltaCom Telecommunications, Inc., MediaOne Telecommunications of Georgia, LLC., NewSouth Communications Corp., Rhythms Links, Inc., The Southeastern Competitive Carriers Association, US LEC Corp., WorldCom, Inc., and Z-Tel Communications, Inc.).

B. Jurisdiction

The Commission has general authority and jurisdiction over the subject matter of this proceeding, conferred upon the Commission by Georgia's Telecommunications and Competition Development Act of 1995 (Georgia Act), O.C.G.A. §§46-5-160 *et seq.*, and generally O.C.G.A. §§ 46-1-1 *et seq.*, 46-2-20, 46-2-21, and 46-2-23. Under the Federal Telecommunications Act of 1996 (Federal Act), State Commission's are also authorized to set terms and conditions for interconnection and access to unbundled elements pursuant to Sections 251 and 252 of the Federal Act.

II. FINDINGS AND CONCLUSIONS

There are three basic parts to a comprehensive performance plan: An appropriate set of performance measurements; an appropriate set of benchmarks and retail analogs to apply to those measurements; and, a remedy plan to ensure compliance with the performance goals.

A. Performance Measures.

A well-defined, effective and meaningful set of performance measurements is essential in order to provide the Commission with the information necessary to assess BellSouth's service to CLECs. This includes comparative measurements that monitor all areas of support, *i.e.*, pre-ordering, ordering, provisioning, collocation, maintenance and repair, operator services, directory assistance, E911, trunk group performance, and billing. Measurements and appropriate methodologies must be documented in detail so that clarity exists regarding what will be measured, how it will be measured, and in what situations a particular event may be excluded from monitoring. Measurement results must be sufficiently disaggregated so that only the results for similar operational conditions are compared and so that the results will not mask discrimination.

1. BST Proposed SQM

BellSouth has proposed a set of SQM to the Commission. BellSouth's SQM covers 9 different functional categories including: Pre-ordering; ordering; provisioning; maintenance and repair; billing; operator services and directory assistance; E911; trunk group performance; and, collocation. Coon, Tr. at 99. BellSouth states that each of these categories corresponds to a function on which BellSouth's performance to CLECs should be measured. Within each of these functional categories BellSouth proposes a series of measurements. Each measurement is broken down into 10 categories including: The measurement itself; a definition of the measure; any exclusions to the measure; business rules; levels of disaggregation; a calculation of the measurement; report structure; data retained relating to CLEC experience; data retained relating to BST experience; and, retail analog/benchmark. Coon, Tr. at 100. BellSouth asserts that these 10 categories provide all of the information necessary to understand the measurement, analyze the result of the measurement, and assess performance against the retail analogue or benchmark. BellSouth states that the format of the SQM is comparable to that of both the Bell Atlantic plan and the Southwestern Bell plan. Coon, Tr. at 100-01.

BellSouth states that in addition to adopting BellSouth's current SQM, the Commission should adopt the five additional measurements that BellSouth is in the process of adding to the SQM. The five additional measures are:

- (1) Service Inquiry with Firm Order (Manual);
- (2) Loop Makeup Inquiry (Manual and Electronic);
- (3) Timeliness of Change Management Notice;
- (4) Percent Functional Acknowledgments Returned On Time; and,
- (5) Percent Troubles Within 7 Days of a Hot Cut.

In addition, BellSouth has added a measure for Hot Cut Timeliness Percentage Within Interval and Average Interval (P-6A, BST Ex. 1) to the SQM. BellSouth also states that it is in the process of adding additional levels of disaggregation to the current SQM to break out xDSL loops, ISDN unbundled loops, and line sharing. Coon, Tr. at 107. Finally, BellSouth states that it has revised its Trunk Blockage Report. BellSouth Exhibits 1 and 2; Coon, Tr. at 150.

After considering BellSouth's proposal and the testimony and arguments presented in this matter, the Commission hereby approves the use of BellSouth's proposed SQM as modified below in Table 1. Any of BellSouth's proposed SQMs not listed below and not otherwise addressed in this order are approved.

TABLE 1

BST Proposed SQMs	Commission Determination
Service Inquiry with Firm Order (Manual)	Adopt BST SQM: Benchmark: 95% returned within 5 business days.
Loop Make Up Inquiry (Manual and Electronic)	See Table 2 for Average Response Time to LMU Information (Manual and Electronic).
Timeliness of Change Management Notices and Documentation	Adopt this BST SQM. 30 days after this order Change Management Team shall file with the Commission the interval to include in this measure.
Percent FAs Returned On Time	See Table 2 for Acknowledgment Timeliness.
Percent Troubles Within 7 days of a HOT CUT.	Adopt BST SQM.
OSS-1 Avg. Response Time and Response Interval	Adopt this SQM with the following Business Rule change: The response interval starts when the client application (LENS or TAG for CLECs and RNS for BST) submits a request to the legacy system and ends when the appropriate response is returned to the client application.
P-1 Percent Flow Through Service Request	Adopt this SQM with the following addition: Add the following measure to the flow-through report: <u>BellSouth Achieved Flow-Through</u> <u>Issued Service Orders</u> Total Mech. LSR's- [(Auto Clarify)+(CLEC fallout)] x 100 The Commission includes the current CLEC Error Excluded Calculation in the VSEEM III Plan. BST and the CLECs shall form an Improvement Task Force. This Task force shall jointly prepare an implementation report, that includes implementation target dates to eliminate the high BellSouth Caused Failures and the designed manual fallout for electronically submitted LSR's. This report shall be filed with the Commission 3 months after the date of this Commission Order. BST is ordered to resume reporting its retail business flow-through results and provide data back to May of 2000.
O-6 Reject Interval	Adopt this SQM with the following amendments: Fully Mechanized: The elapsed time form receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in EDI, TAG OR LENS). Auto Clarifications are considered in the Fully Mechanized Category.

	Partially Mechanized: The last sentence should read: "The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via (LENS, EDI or TAG)."
O-7 FOC Timeliness	The stop time is meant to represent the time that BST actually returns the FOC to the CLEC.
O-9 LNP- Percent Rejected Service Requests O-10 LNP- Reject Interval Distribution & Average Reject Interval O-11 LNP- FOC Timeliness Interval Distribution & FOC Average Interval P-10 LNP Missed Installation Appointments P-2 Average Jeopardy Notice Interval & % of Orders Given a Jeopardy Notice P-5 Average Completion Notice Interval P-11 LNP Disconnect Timeliness P-12 LNP Total Service Order Cycle Time	These measures should not exclude Non-Mechanized LSRs.
P-5 Average Completion Notice Interval	Adopt the SQM with the following change: Business Rules: The start time is the completion time stamp either by the field technician or the 5PM due date stamp; the end time is the time stamp the notice is transmitted to the CLEC Interface (LENS, EDI or TAG).
P-8 Total Service Order Cycle Time	Adopt the SQM with the following changes: Definition: This report measures the total service order cycle time from receipt of a valid service order request to the return of a completion notice to the CLEC Interface. Business Rules: This measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval. This interval starts with the receipt of a valid service order request and stops when a completion notice is sent to the CLEC Interface (LENS, TAG or EDI).
MR-3 Maintenance Average Duration	Adopt the SQM with the following Change: Exclusions: Delete Trouble Reports greater than 10 days.
P-9 Service Order Accuracy	Adopt the SQM with the following Change: Benchmark: 95% Accurate
C-1 Average Response Time	Adopt with the following changes: Definition: Measures the average time (counted in calendar days) from receipt of a complete and accurate collocation application (including receipt of application fees) to the date BellSouth responds in writing. Within 10 calendar days after

	<p>having received a bona fide application for physical collocation, BellSouth must respond as to whether space is available or not.</p> <p>Level of Disaggregation: Caged/Cageless shall be added.</p> <p>Benchmark:</p> <p><u>Now</u></p> <p>Virtual- 20 Calendar Days Physical- 30 Calendar Days Caged/Cageless- 30 Calendar Days</p> <p><u>6 Months</u></p> <p>Virtual- 10 Calendar Days Physical- 20 Calendar Days Caged/Cageless- 20 Calendar Days</p>
C-2 Average Arrangement Time	<p>Adopt with the following changes:</p> <p>Definition: Measures the average time from receipt of a complete and accurate Bona Fide firm order (including receipt of appropriate fee) to the date BST completes the collocation arrangement and notifies the CLEC (counted in calendar days).</p> <p>Level of Disaggregation: Caged/Cageless shall be added</p> <p>Benchmark:</p> <p style="padding-left: 40px;">Virtual: 50 Calendar Days (Ordinary) 75 Calendar Days (Extraordinary)</p> <p style="padding-left: 40px;">Physical/Caged: 90 Calendar Days</p> <p style="padding-left: 40px;">Cageless: 60 Calendar Days (Ordinary) 90 Calendar Days (Extraordinary)</p>
C-3 Percent Due Dates Missed	<p>Adopt with the following changes:</p> <p>Level of Disaggregation: Caged/Cageless shall be added</p> <p>Benchmark: 95% on time</p>

2. Additional CLEC Proposed SQM

The CLEC Coalition argues that BellSouth's SQM are inadequate and do not meet the needs of CLECs and the Commission to evaluate the local market. The CLEC Coalition states that the BellSouth plan lacks many key measures and has proposed that thirty-nine additional performance measurements be added to BellSouth's SQM. Emch Dir. Ex. 1; Emch Rebuttal Ex. 4.

The CLEC Coalition states that a comparison of the measures included in the Texas and New York plans approved by the FCC demonstrates the inadequacies of the measures currently provided by BellSouth. More than 70% of the New York measures are missing from the BellSouth SQM. Emch Dir. Ex. 2. Similarly, 48 of the measures in the Texas plan are not included in BellSouth's SQM. Emch Dir. Ex. 3. The deficiencies in BellSouth's proposal include: Loop hot cuts; software issues; xDSL pre-ordering; ordering and provisioning; change management; data base accuracy and timely updates; order status completeness; and, billing completeness. Emch Rebuttal 3. The CLEC Coalition argues these are significant shortcomings, not minor issues, as BellSouth has contended.

The Commission agrees that some, but not all, of the CLEC Coalition's proposed additional SQM should be adopted. After considering the CLEC Coalition's additional proposed SQM and the testimony and arguments presented in this matter, the Commission hereby approves the use of the following additional measures as set forth below in Table 2.

TABLE 2

CLEC SQM PROPOSALS	COMMISSION DETERMINATION
Average Response time for LMU information (MANUAL)	<p>A) Disaggregation: ADSL, HDSL, Other DSL and Line Sharing.</p> <p>B) LMU Information: BST shall deliver all the information it has on the makeup of the loop. This list may be updated pending the outcome of Docket 11900-U</p> <p>C) Benchmark 95% in 3 business days</p>
Average Response time for LMU information (ELECTRONIC)- EDI, TAG, LENS & RoboTAG.	<p>A) Disaggregation: ADSL, HDSL, Other DSL and Line Sharing.</p> <p>B) LMU Information: BST shall deliver all the information it has on the makeup of the loop. This list may be updated pending the outcome of Docket 11900-U.</p> <p>C) Benchmark</p>