

IX. DUF PRICING

- Assuming the new demand analysis is included in the costs for Louisiana, the new DUF rates would be as set forth at Tab 27.

FL 3PT Open Exceptions - Metrics

10	<p>KPMG has found that BellSouth's implemented metrics calculations for the <i>Reject Interval - LNP SQM</i> report (5/00) are inconsistent with the documented metrics calculations.</p> <p>Specifically, KPMG alleges that the BellSouth code applied to assign rejected LNP transactions to the appropriate "interval bucket" does not properly reflect the intervals defined in the SQM. This issue has no impact on the reliability of the overall results reported against the established performance benchmark (X% within Y hours) in the Monthly State Summary (MSS).</p>
22	<p>KPMG cannot replicate the values in the <i>LNP Disconnect Timeliness Interval SQM</i> report for the CLEC Aggregate (5/01).</p> <p>BellSouth began producing raw data for this metric with May 2001 results. The initial (manual) data extract process required to post the raw data in PMAP NODS V did not post all of the raw data necessary for KPMG to perform its replication test. However, the measurement result was not impacted. This manual extract process was rerun and KPMG is currently retesting the May 2001 results. BellSouth automated the data extract process in support of this metric beginning with June 2001 results and believes that the results for this metric are correct (as long as the complete raw data set is utilized). Furthermore, BellSouth has asked the Commission not to rely on this measure in evaluating its section 271 application since the metric definition yields a meaningless result.</p>
27	<p>KPMG cannot replicate the values in the <i>Provisioning Troubles Within 30 Days (Non-Trunks) SQM</i> report for the CLEC Aggregate (5/00).</p> <p>BellSouth is implementing a coding change to address a script correction and updating the Raw Data User Manual that will be effective for October data. For several months now, the discrepancies in BellSouth's calculations for this measure have been limited to the BellSouth Retail Design analog and the difference across all impacted submetrics using this analog was no more than 0.0098% for GA September results (18 records mismatched in GA) and significantly less in October (1 record mismatched in both GA and FL). BellSouth has fixed this measure with the publication of October results.</p>

FL 3PT Open Exceptions - Metrics

36	<p>BellSouth does not properly construct the processed data used to validate the <i>FOC Timeliness</i> and <i>Reject Interval SQM</i> reports.</p> <p>There are three issues... (1) KPMG not excluding holiday hours appropriately, (2) FOC and reject responses with negative intervals being included, and (3) clarify the SQM regarding the handling of multiple responses. BellSouth is updating the business rules in the SQM to clarify that (in those cases where multiple FOCs or rejects are returned) the first FOC or reject is used to calculate the duration. BellSouth believes that it is properly calculating intervals for LSRs processed on weekends and holidays. The impact of negative intervals on August and September data was 0.012 - 0.014% of the total volume and BellSouth has agreed to exclude these transactions (caused by service rep input errors) beginning with October results. KPMG will be retesting using 10/01 data and the revised version of the FL SQM.</p>
101	<p>KPMG cannot replicate the values in the <i>Total Service Order Cycle Time SQM</i> report for the CLEC Aggregate (1/01).</p> <p>This exception is a result of the inclusion of pending orders (status "PD") in the calculation. These transaction types occur very infrequently in the SQM results. KPMG identified results discrepancies in only one product category (CLEC UNE Other - Design) and the difference between KPMG- and BellSouth-calculated results is 0.35%. BellSouth implemented a fix effective with August data to exclude pending service orders from the measure and KPMG is currently retesting the metric.</p>
109	<p>KPMG cannot replicate the values in the <i>Acknowledgement Message Timeliness SQM</i> report for the CLEC Aggregate (5/01).</p> <p>The issue that KPMG has identified is specific to the reporting of results in the correct "interval buckets". As KPMG states in the Exception Report, the bucket designations have been correctly defined in the Florida SQM; however, the code has defined the buckets slightly differently. As a result of rounding and incorrect bucket definitions, BellSouth is mapping transactions with intervals at the "edges" of the various bucket designations into the wrong "interval buckets". This issue has absolutely no impact on the CLEC aggregate results reported against the established benchmark (X% w/in Y mins)... the monthly results published by BellSouth via the MSS are accurate. BellSouth's PMAP code will be corrected to assign transactions to the proper "Interval buckets" for November 2001 results.</p>

FL 3PT Open Exceptions - Metrics

113	<p>KPMG has found that BellSouth does not capture xDSL transactions, which are processed through Corporate Order Gateway (COG), for the <i>Percent Flow Through Service Requests (Summary & Detail)</i> SQMs.</p> <p>This issue has a negligible impact on Flow Through results, and BellSouth has fixed the problem effective with September 2001 data by manually including xDSL transactions in the UNE and Aggregate results. The inclusion of xDSL transactions in the Flow Through results will be mechanized by 1Q02. BellSouth calculated xDSL-specific Flow Through results for August (87.96%) and September (85.32%). The inclusion of xDSL data in September had less than a 0.5% impact (toward the upside) on the UNE Percent Flow Through results and even less of an impact on the Aggregate results.</p>
114	<p>BellSouth incorrectly excludes data between the BARNEY Snapshot and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the <i>FOC Timeliness</i> SQM (6/01).</p> <p>BellSouth has excluded DL LSRs, LSRs with specific OCNs, LSRs with negative FOC intervals, and LSRs with certain NC, NCI, or TOS (Coin or Government) codes. BellSouth has eliminated 98% of excluded transactions with the inclusion of DL LSRs in the UNE Other (Non-Design) category beginning with September 2001 results. BellSouth's investigation on the remaining 2% of the excluded records is ongoing with the following status... (1) unmapped products (TOS, NC, NCI codes) are generally new, low volume products that may be properly excluded (if a fix is required, should be available for November results), (2) a BellSouth analysis of negative FOC durations indicates this anomaly occurred in less than 0.03% of total transaction records studied in July and October (will be excluded beginning with October results), and (3) most, if not all, of the unmapped OCNs are related to unbillable or test accounts and those LSRs are correctly excluded from the results.</p>
119	<p>KPMG has discovered that BellSouth is not adhering to the documented metrics change control process for tracking changes in TeamConnection.</p> <p>This exception simply identifies that BellSouth occasionally falls behind in updating its internal metrics Change Control Process tool. BellSouth will improve its adherence to the published Metrics Change Control procedures by adding personnel to manage the issue and development tracking processes.</p>

FL 3PT Open Exceptions - Metrics

120	<p>BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the <i>Percent Rejected Service Requests</i> SQM (6/01).</p> <p>KPMG has agreed that the original transactions provided to BellSouth as "missing" are not appropriate. Once KPMG provides the appropriate data set, BellSouth will investigate the issues.</p>
122	<p>BellSouth did not provide flow through classification information for Digital Subscriber Line (DSL) orders submitted by KPMG.</p> <p>BellSouth is currently investigating technical solutions to provide CLECs with xDSL flow through transaction classification detail in response to this exception. This issue is specific to the provision of raw data associated with the <i>Percent Flow Through Report</i> and has no impact on the reporting of CLEC-aggregate flow through results.</p>

**SUPPORTING MATERIALS
FOR BELL SOUTH
NOVEMBER 29 EX PARTE**

CC DOCKET No. 01-277

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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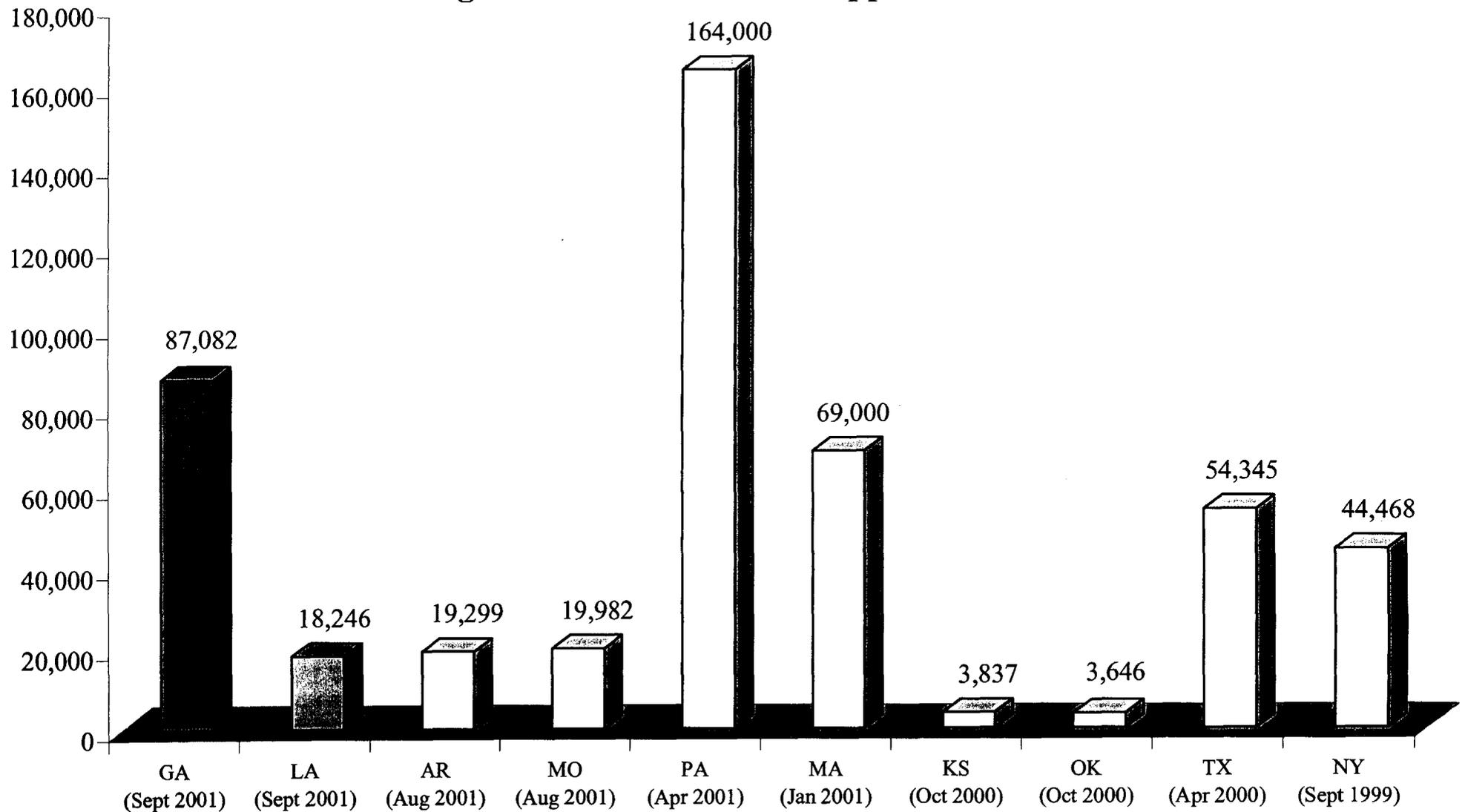
**BELLSOUTH NOVEMBER 29 EX PARTE
CC DOCKET NO. 01-277**

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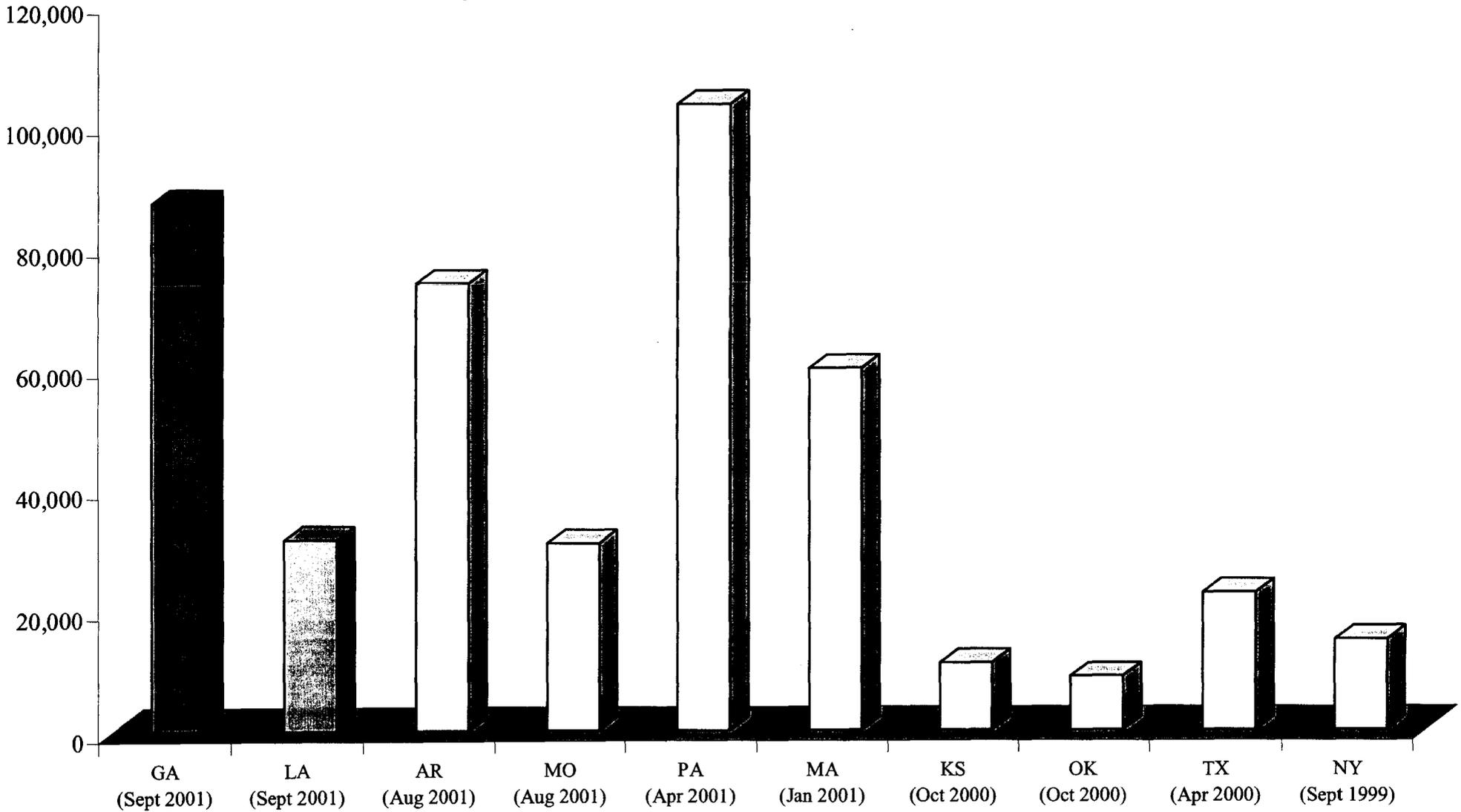
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17	Comparison of Manually Submitted Orders in BellSouth Region and SWBT States
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26	Analysis of Line Sharing Percent Repeat Troubles Within 30 Days
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Unadjusted Number of Standalone Loops Georgia & Louisiana vs. 271-Approved States



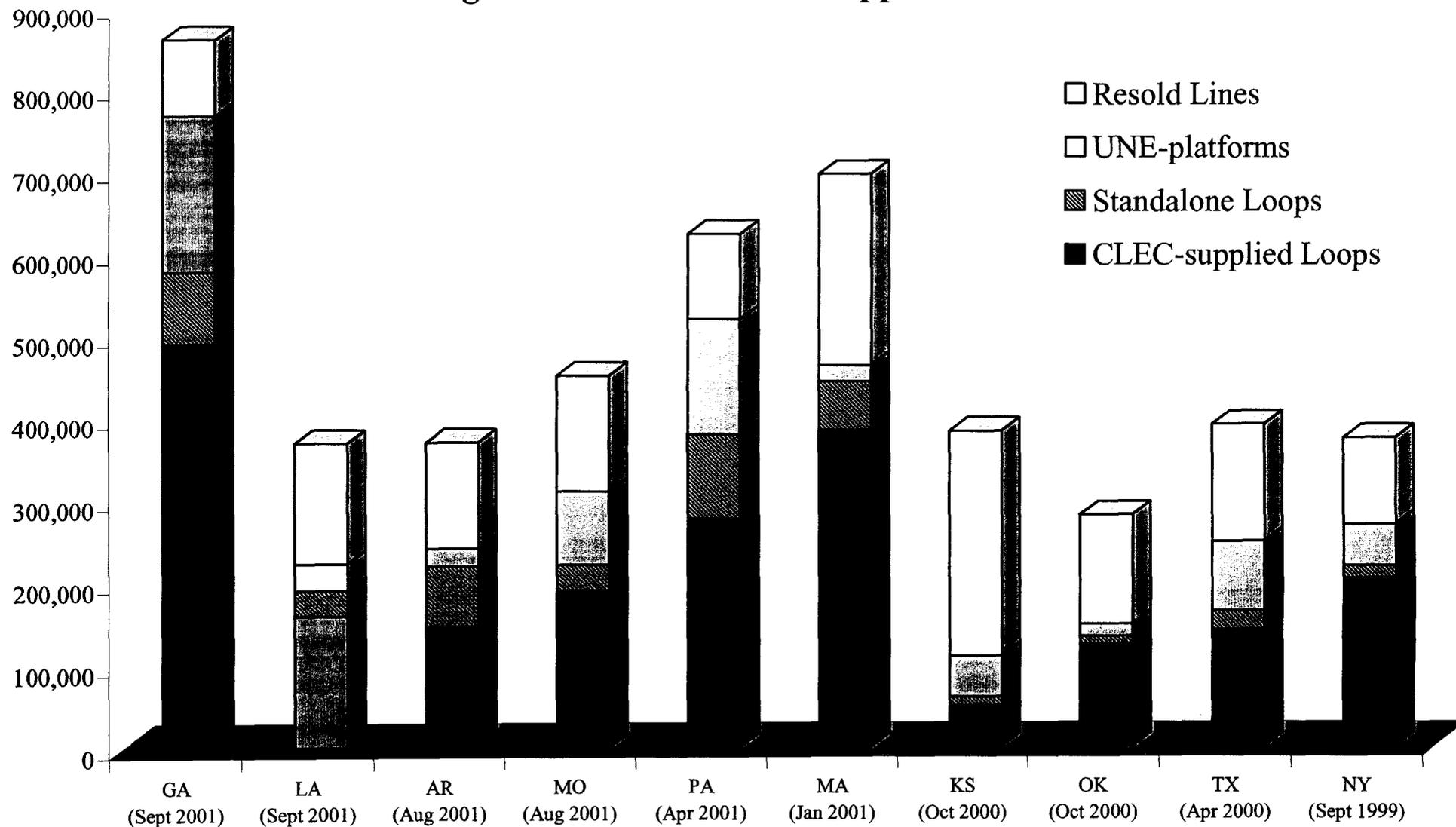
Sources: GA: Stockdale Reply Aff., Ex. 2; LA: Stockdale Reply Aff., Ex. 6; AR: J.G. Smith Aff., Att. A; MO: Tebeau Aff., Att. A; PA: Taylor Decl., Att. 1; MA: Supplemental Brief, Ex. 1; KS: Smith-Johnson Aff., Att. 1; OK: Smith-Johnson Aff., Att. 1; TX: Habeeb Supplemental Aff., Att. 1; NY: Taylor Decl., Att. A.

Standalone Loops Comparison Georgia & Louisiana vs. 271-Approved States



Note: Competitive numbers have been adjusted in relation to the number of BOC switched access lines in each state at the time of application as compared with Georgia.
Sources: GA: Stockdale Reply Aff., Ex. 2; LA: Stockdale Reply Aff., Ex. 6; AR: J.G. Smith Aff., Att. A; MO: Tebeau Aff., Att. A; PA: Taylor Decl., Att. 1; MA: Supplemental Brief, Ex. 1; KS: Smith-Johnson Aff., Att. 1; OK: Smith-Johnson Aff., Att. 1; TX: Habeeb Supplemental Aff., Att. 1; NY: Taylor Decl., Att. A.

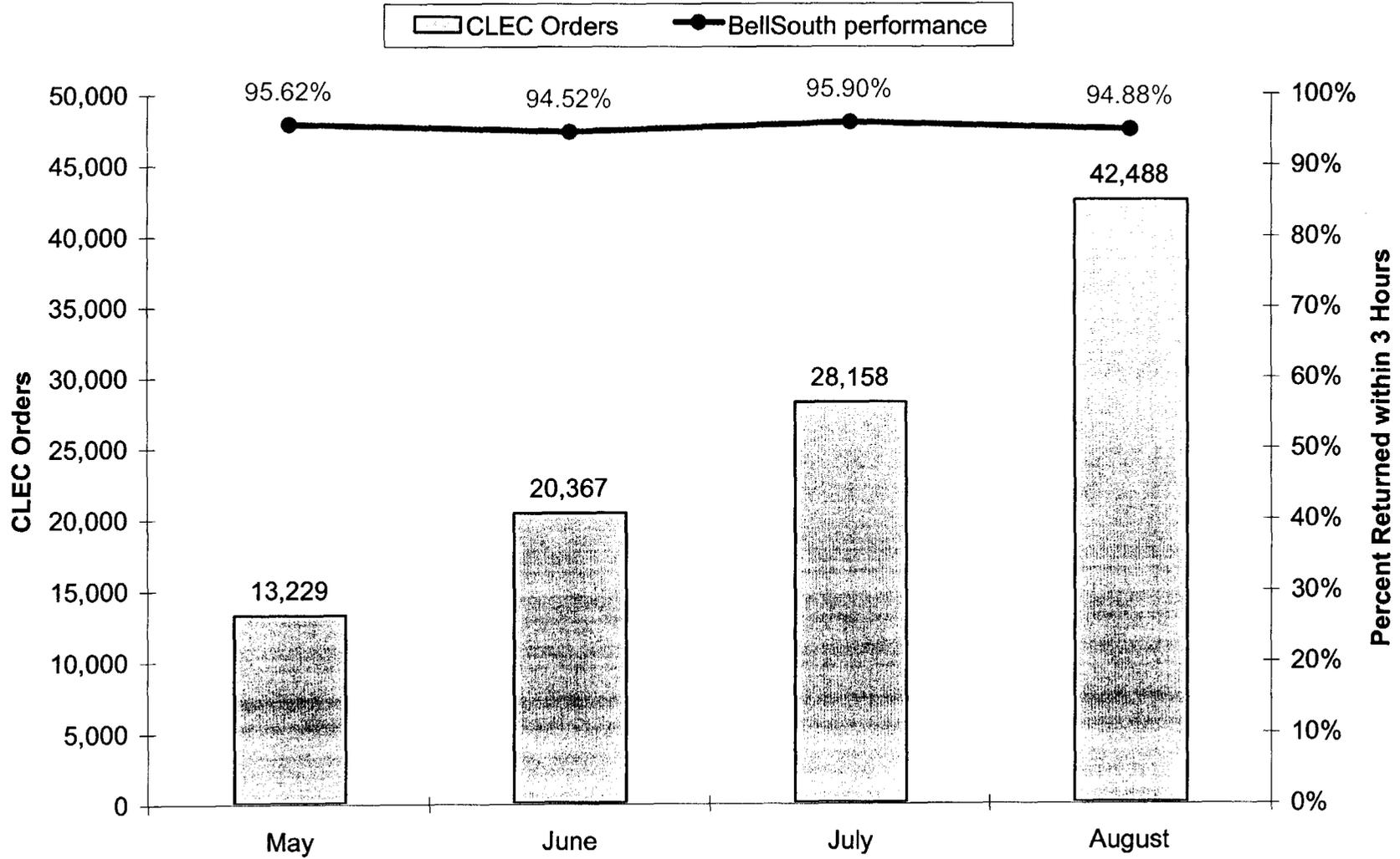
Total Lines Comparison Georgia & Louisiana vs. 271-Approved States



Note: Competitive numbers have been adjusted in relation to the number of BOC switched access lines in each state at the time of application as compared with Georgia.

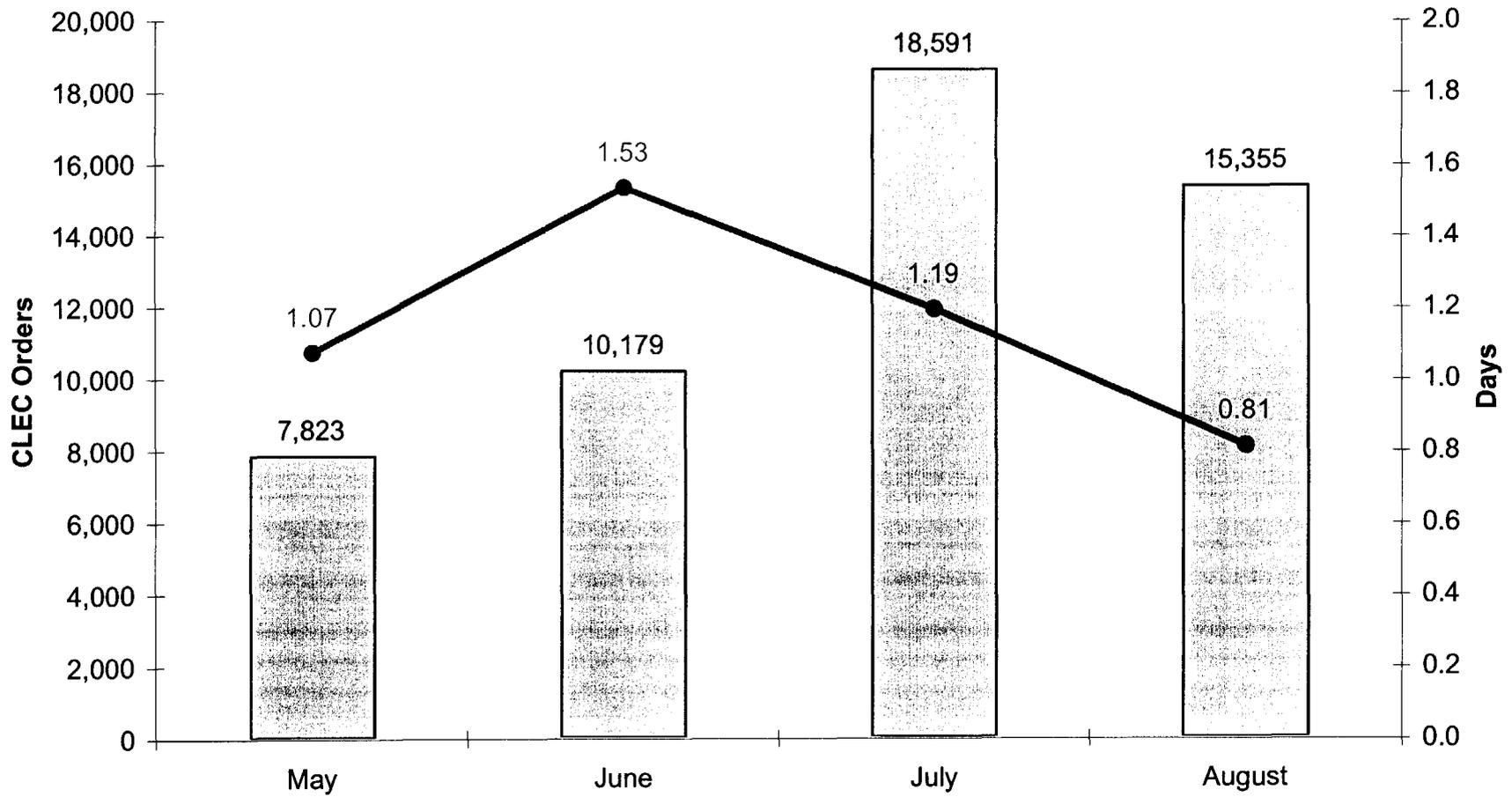
Sources: GA: Stockdale Reply Aff., Exhs. 2 & 3; LA: Stockdale Reply Aff., Exhs. 6 & 7; AR: J.G. Smith Aff., Att. A; MO: Tebeau Aff., Att. A; PA: Taylor Decl., Att. 1; MA: Supplemental Brief, Ex. 1; KS: Smith-Johnson Aff., Att. 1; OK: Smith-Johnson Aff., Att. 1; TX: Habeeb Supplemental Aff., Att. 1; NY: Taylor Decl., Att. A.

Firm Order Confirmation Timeliness – Mechanized – Loop + Port Combinations – Georgia

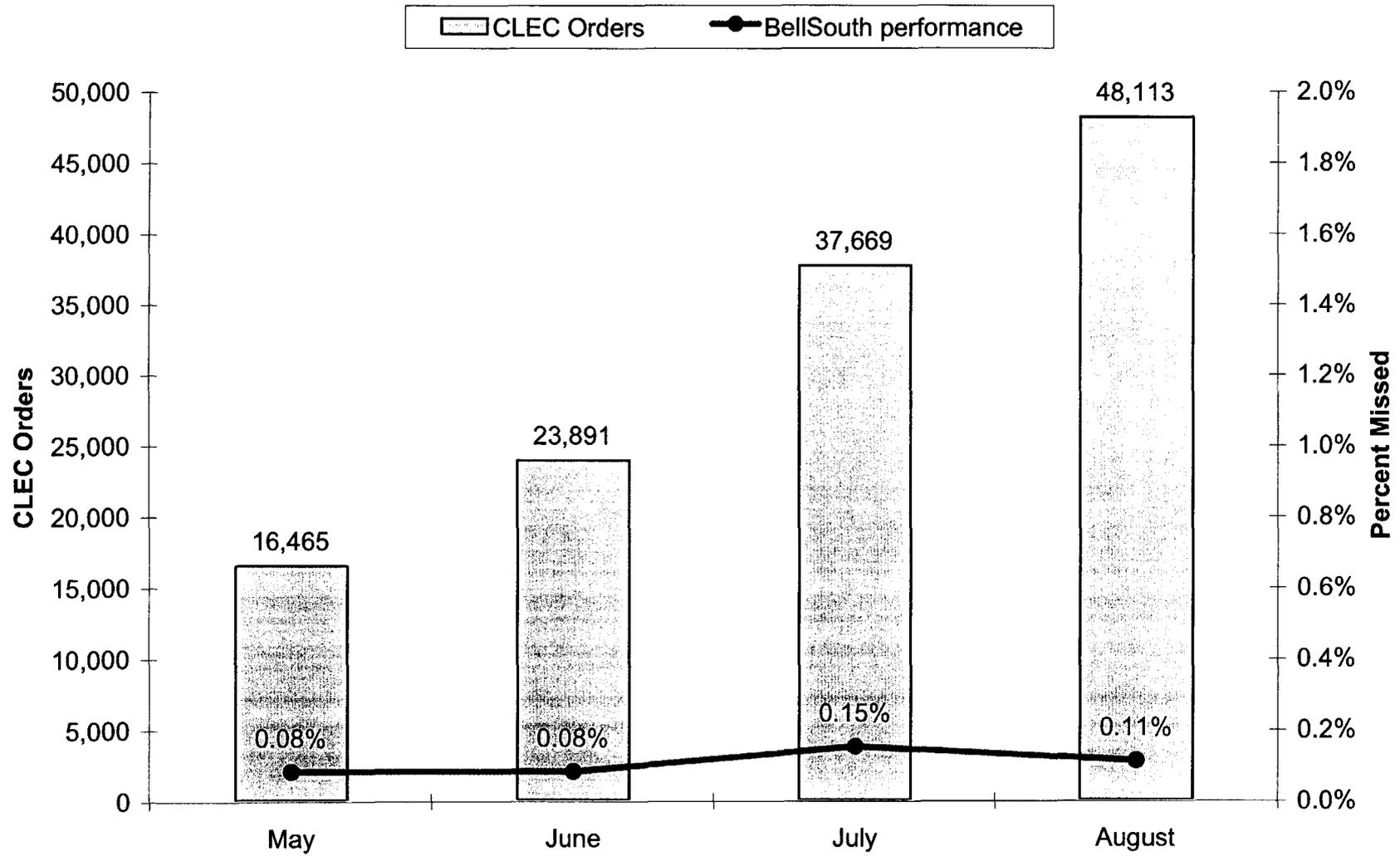


Order Completion Interval – Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia

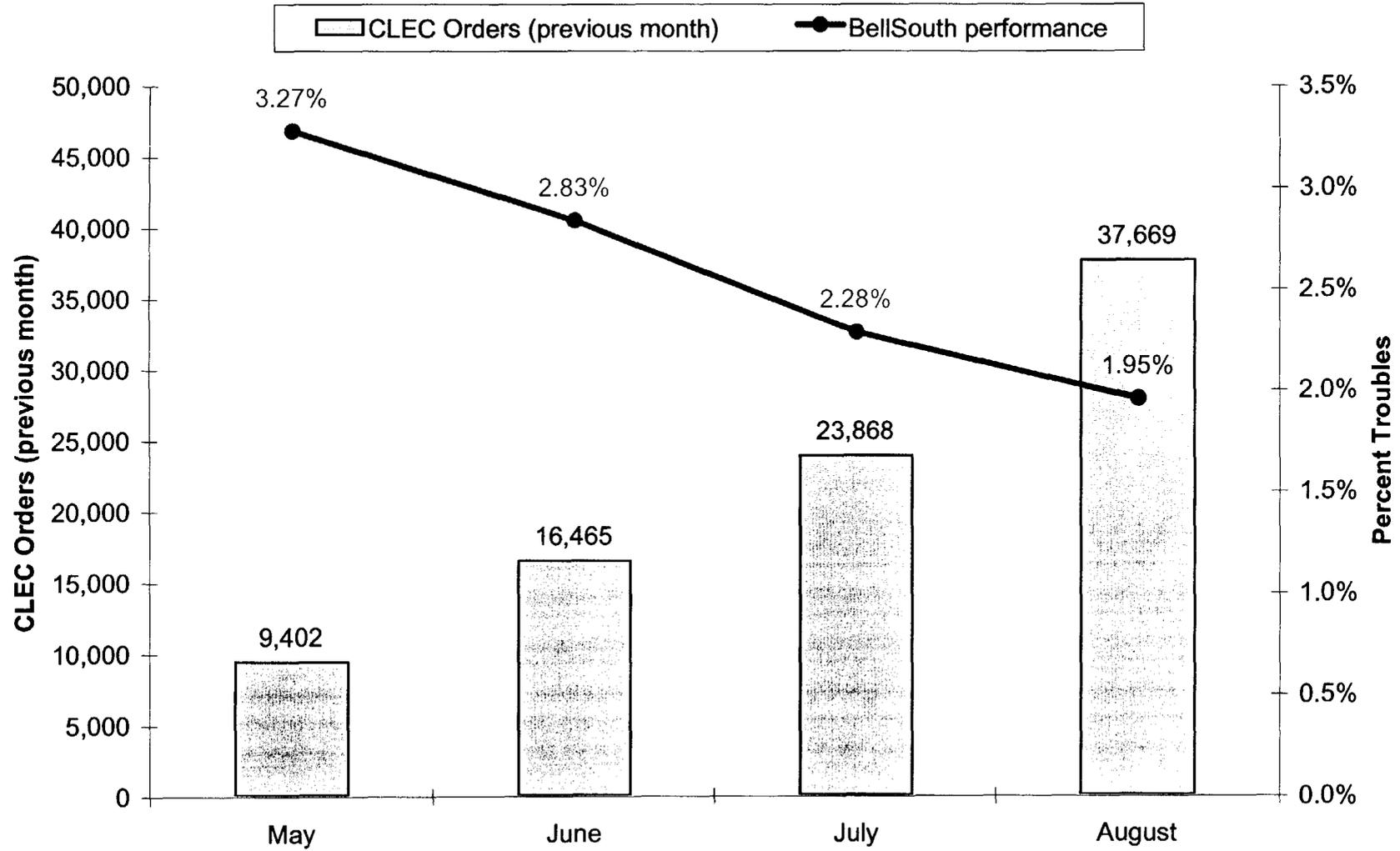
CLEC Orders BellSouth performance



% Missed Installation Appointments – Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia

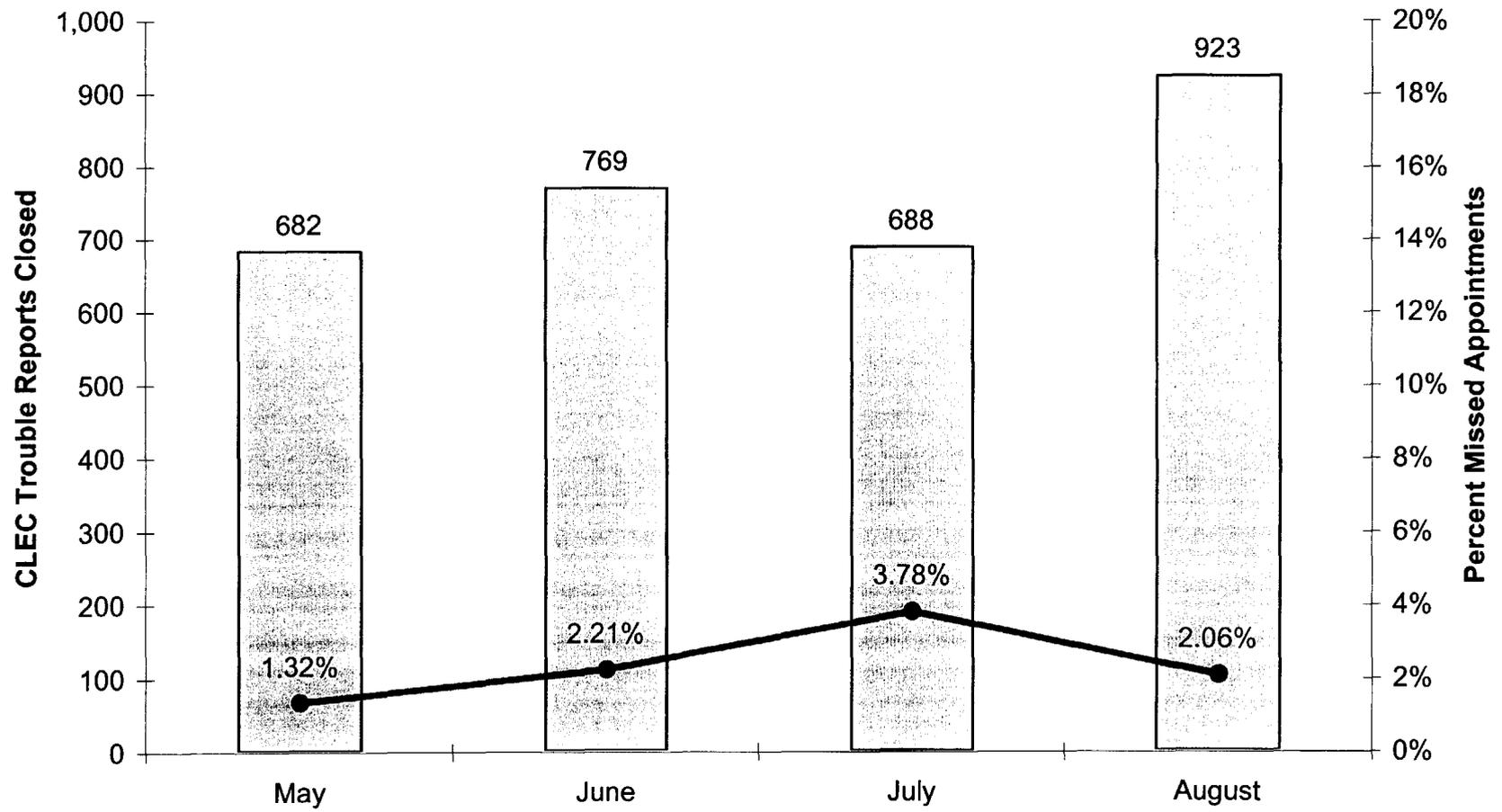


% Provisioning Troubles within 30 Days – Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia



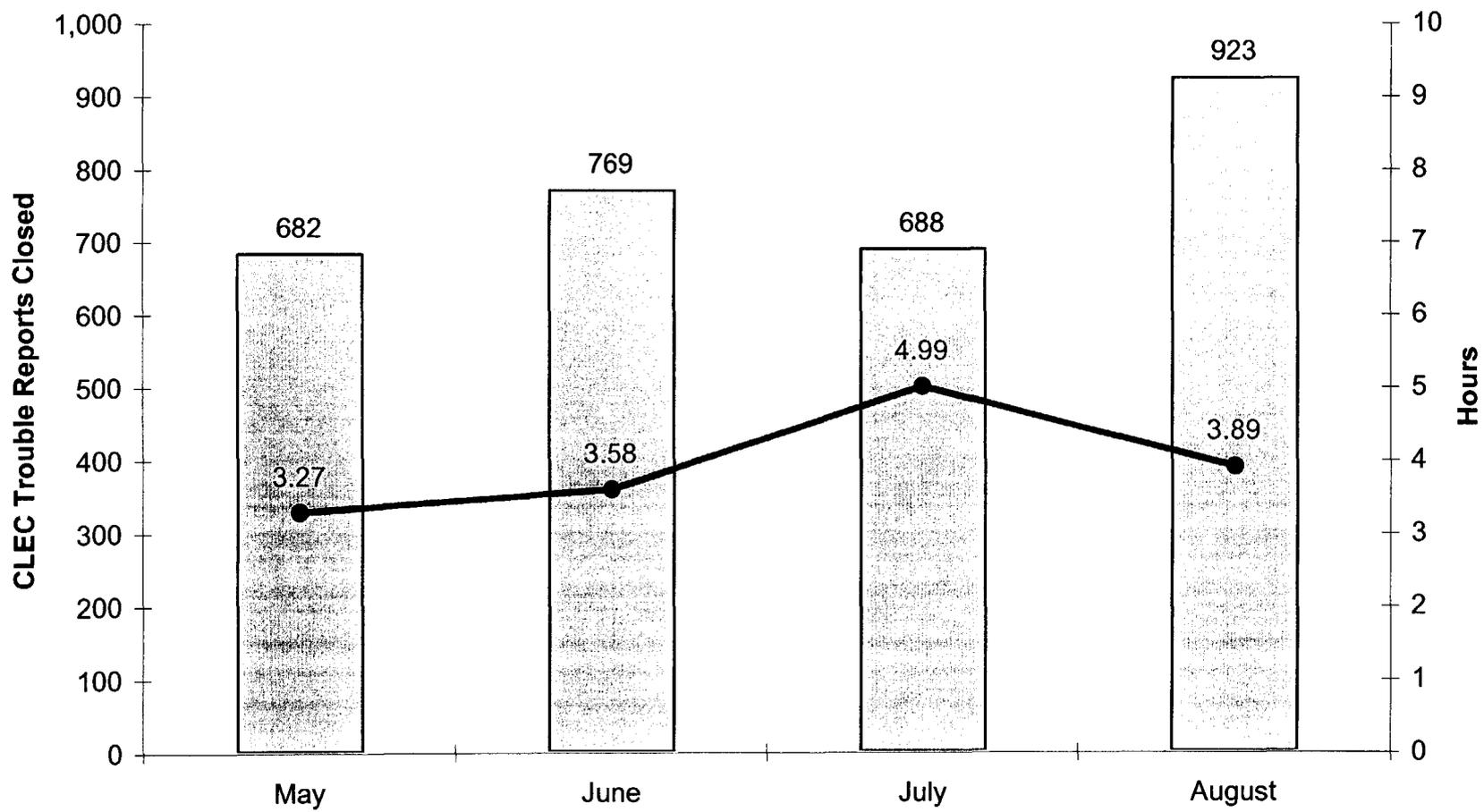
Missed Repair Appointments – Loop + Port Combinations/ Non-Dispatch – Georgia

□ CLEC Trouble Reports Closed ● BellSouth performance



Maintenance Average Duration – Loop + Port Combinations/ Non-Dispatch – Georgia

□ CLEC Trouble Reports Closed ● BellSouth performance



GEORGIA**Firm Order Confirmation Timeliness - Mechanized**

>=95% w/in 3 hrs

	May	June	July	August
BellSouth performance	95.62%	94.52%	95.90%	94.88%
CLEC Orders	13,229	20,367	28,158	42,488

Order Completion Interval

	May	June	July	August
BellSouth performance	1.07	1.53	1.19	0.81
CLEC Orders	7,823	10,179	18,591	15,355

% Missed Installation Appointments

	May	June	July	August
BellSouth performance	0.08%	0.08%	0.15%	0.11%
CLEC Orders	16,465	23,891	37,669	48,113

% Provisioning Troubles within 30 Days

	May	June	July	August
BellSouth performance	3.27%	2.83%	2.28%	1.95%
CLEC Orders (previous month)	9,402	16,465	23,868	37,669

Missed Repair Appointments

	May	June	July	August
BellSouth performance	1.32%	2.21%	3.78%	2.06%
CLEC Trouble Reports Closed	682	769	688	923

Maintenance Average Duration

	May	June	July	August
BellSouth performance	3.27	3.58	4.99	3.89
CLEC Trouble Reports Closed	682	769	688	923



Overview of the amount of change in moving to the GA Order

PMAP	Measures	Levels or Reports	Average Level of Disaggregation	Results to Produce	Change
4Q - 2000	56	350	4 per report	1,400	
With GA Order	79	500	9 per report	4,500	69%

PARIS	Measures	Levels or Reports	Average Level of Disaggregation	Results to Produce	
4Q - 2000	29	300	1	300	
For the GA Order	36	340	3	1,020	71%

271	Measures		Average Level of Disaggregation	Results to Produce	
4Q - 2000	56		21	1,200	
With GA Order	79		29	2,300	48%

Work Effort*				
Barney	PMAP	PARIS	271	Total
658	6025	5850	2605	15,138

* Manhours; Does not include the time required for BTSI to implement changes in source systems.

Levels of Reports:
noted in the SQM as Report Structure, such as; CLEC specific, BST Aggregate, etc.

Average Level of Disaggregation:
for example a report changes from 6 levels of product disaggregation to 22.

Results to Produce:
each product on each report represents a distinct work effort to produce - indicates complexity of the work to be done.

Louisiana / Georgia Repost-Refile Analysis			
	Submetrics Changes	Denominator = submetrics with Y/N or blank	Denominator = All submetrics
	7		
		0.5%	0.3%
Denominator		1310	2250
% chng blank to Y	2		
% chng blank to N	0		
% chng Y to N	0		
% chng N to Y	0		
No Change	5		
	14		
		1.1%	0.6%
Denominator		1321	2248
% chng blank to Y	0		
% chng blank to N	1		
% chng Y to N	0		
% chng N to Y	0		
No Change	13		
	9		
		0.7%	0.4%
Denominator		1316	2244
% chng blank to Y	0		
% chng blank to N	0		
% chng Y to N	0		
% chng N to Y	1		
No Change	8		
	0		
		0	0.0%
		1318	
	0		
		0	0.0%
		1322	2244
TOTAL CHANGES	30	0.5%	0.3%
Denominator		6587	8986
TOTAL "Parity Determination" Changes	4	0.06%	0.045%
Denominator		6587	8986
	102		
		7.8%	4.5%
Denominator		1314	2247
% chng blank to Y	6		
% chng blank to N	0		
% chng Y to N	2		
% chng N to Y	5		
No Change	89		
	56		

Louisiana / Georgia Repost-Refile Analysis			
	Submetrics Changes	Denominator = submetrics with Y/N or blank	Denominator = All submetrics
		4.3%	2.5%
Denominator		1316	2248
% chng blank to Y	12		
% chng blank to N	0		
% chng Y to N	0		
% chng N to Y	2		
% chng Y to blank	5		
% chng N to blank	5		
No Change	32		
	93		
		7.1%	4.1%
Denominator		1315	2243
% chng blank to Y	5		
% chng blank to N	2		
% chng Y to N	2		
% chng N to Y	9		
No Change	75		
	5		
		0.4%	0.2%
Denominator		1313	2241
% chng blank to Y	0		
% chng blank to N	0		
% chng Y to N	0		
% chng N to Y	0		
No Change	5		
	0		
		0%	0.0%
		1315	2248
TOTAL CHANGES	256	3.9%	2.3%
Demoninator		6573	11227
TOTAL "Parity Determination" Changes	55	0.8%	0.5%
Demoninator		6573	11227

For the Summary sheet the following logic was used for the numerator and denominator of calculations for %Change of Charts and %Change of Value (Y to N, N to Y etc).

%Change of Charts

Y/N Charts

Numerator = number of Parity Chart Changes (first number in Parity Diagnostic Charts column)

Denominator = total of charts for that month that had Y/N entries

Y/N & Blank

Numerator = number of Parity Chart Changes (first number in Parity Diagnostic Charts column)

Denominator = total of charts for that month that had Y/N entries and those that were blank but eligible for Y/N

Total

Numerator = total of chart changes (first and second number Parity Diagnostic Charts column added together)

Denominator = total of charts for that month including diagnostic and PBD

%Change of Value

Chng blank to Y

Chng blank to N

Chng Y to N

Chng N to Y

Chng Y to blank

Chng N to blank

Numerator = number of changes in that category

Denominator = total of charts for that month that had Y/N entries and those that were blank but eligible for Y/N