well within the benchmarks set by the Georgia and Louisiana commissions, and those benchmarks are comparable to those set by state commissions in states that have received 271 approval.

13. Third, an examination of the accuracy of manually processed orders allows assessment of whether the orders that do require manual processing are provisioned so as to provide CLECs a meaningful opportunity to compete. When properly analyzed, the evidence shows that BellSouth processes orders with good accuracy and at parity with the accuracy it provides for its retail customers.

14. Fourth, the scalability of BellSouth's OSS is also important. Given the continued increase in the overall demands on BellSouth's OSS, as well as the continued high level of service that has been maintained in the face of significant increases in UNE-P volumes over the last several months, BellSouth has demonstrated that its systems are scalable and quite capable of handling the increasing level of demand placed on them.

15. Fifth, the availability of the mechanical systems is also a factor. However, BellSouth's mechanical systems are rarely out of service. BellSouth measures system availability in the same way as the 271 approved states, and BellSouth's performance is as good as performance in those states.

16. Finally, manual handling does not only impact CLECs. Any understanding of the likely commercial effects of manual handling requires some comparison to BellSouth's own retail operations. BellSouth engages in significant manual handling for its own retail operations. Many BellSouth and CLEC orders involve relatively complex

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changes on the UNE-P.

product offerings. These are processed manually for all parties. For example, orders for multi-line hunting capabilities differ significantly by the provisioning switch and thus require expert intervention to ensure the proper configuration of the order. This is true no matter whether the order comes from a CLEC or from retail. The decision to substitute mechanical systems for manual handling depends on a number of circumstances including both the complexity of the service request and the forecast volume of the request. There are certain activities translating a service request into BellSouth's internal service order format that will require the intervention of a skilled service representative or service designer for the foreseeable future. These types of activities on both the retail and wholesale side have too many variables to allow any practical level of mechanization. On the other dimension, even if a particular service request could be mechanized, if the forecast volumes are low, a business decision has to be made weighing the costs of mechanization versus the costs of continued manual handling. BellSouth is continually working with CLECs, often within state commission proceedings, to evaluate substituting mechanical for manual handling.

IV. BELLSOUTH'S OSS PROCESS A HIGH PERCENTAGE OF ORDERS MECHANICALLY

17. BellSouth's OSS process a high percentage of CLEC orders mechanically. In September, over 90% of all LSRs submitted by CLECs were submitted mechanically using the electronic interfaces provided by BellSouth. As the DOJ notes, mechanical processing results in efficiencies for CLECs. DOJ Evaluation at 14. Because BellSouth processes a significant percentage of CLEC orders mechanically, CLECs

enjoy a relatively high level of ordering efficiency in Georgia and Louisiana, and a correspondingly low level of manual handling.[2]

18. Less than 10 percent of CLEC orders in September 2001 came from CLECs that opted to use manual processes for their own business reasons or that were submitted for complex, or very low volume products that cannot be ordered electronically.[3]

19. Some of that 10%, moreover, includes CLECs that have, for their own business reasons, elected not to make use of the electronic ordering capabilities that BellSouth has made available. A good example is Covad, cited by DOJ to illustrate "[t]he magnitude of manually processed orders for some CLECs...." DOJ Evaluation at 16. Contrary to the DOJ's conclusions, BellSouth's electronic ordering interfaces do in fact accept the vast majority of the types of orders Covad has submitted, as explained in the Reply Affidavit of Mr. Jerry Latham. For whatever reason, Covad has decided not to make use of such electronic order capabilities, even though it participated in the beta testing of BellSouth's electronic xDSL ordering functionality. This may be due to Covad's business strategy, as a result of which Covad laid off 70 percent of its work force in Atlanta and abandoned plans to build a new headquarters in Georgia.[4] BellSouth cannot be held accountable for Covad's business decision to fax LSRs to BellSouth rather than sending them electronically, had Covad devoted the resources to making use of BellSouth's electronic ordering capabilities.

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[2] Approximately 10 percent of the CLEC orders that are submitted electronically fall out for planned manual handling. Again, these orders involve more complex services or unusual situations. BellSouth generally employs manual handling for its own retail operations in similar circumstances.

[3] Examples of complex or low volume products that cannot be ordered electronically include: (1) trunk or data port service terminating on a switch (PBX trunks [including DID], Primary Rate ISDN lines, Synchronet lines, etc.); (2) LSRs involving multiple lines; (3) complex listings; and (4) multi-point data services. BellSouth retail generally uses a manual process for ordering these same services.

REJECTS

20. DOJ notes CLEC comments that claim that BellSouth "rejects a significant amount of CLEC orders that it should accept for processing." DOJ Evaluation at 19. BellSouth reports the number of rejects by product category as a part of its Monthly State Summary reports. In order to get an idea as to the reasonableness of BellSouth's reject rates, below is a chart that compares BellSouth's reject rates with the reject rates for Verizon and SBC.

Percent of LSRs Rejected for CLEC Errors

	% Rejected LSRs	Range of CLEC Reject Rates
SBC Texas (Texas 271 Order at ¶176, n. 475)	30% LEX and EDI Orders [based on ATT allegation]	Range 10.8% to 60%
SBC Missouri	LEX 44% 12-month avg. EDI 24.8% 12-month avg.	
Verizon Massachusetts (Massachusetts 271 Order at ¶75)	43 to 49% - Resale 21 to 25% - UNE	Range 5% to 83%
Verizon New York (New York 271 Order at ¶175)	27 to 34% UNE	Range 3% to >70%
BellSouth-Georgia Mechanized and Partial Mechanized (September)		Range (Mechanized & Part. Mechanized)
	Residential – 14.1%	1.1 to 90.4%
	Business - 22.1%	9.3 to 29.4%
	UNE - 20.0%	2.7 to 87.4%

[4] "Covad Will Lay Off 200 in Atlanta Telecom cuts costs: 70% of Metro Area Force Affected," *Atlanta Journal and Constitution*, F.1 (November 28, 2000).

21. Because BellSouth rejects a lower percentage of CLEC orders, CLEC orders generally have a higher chance of being processed by BellSouth's mechanized system.

22. The reject rate for CLEC UNE orders is very similar to the reject rate for CLEC resale orders. In Georgia, for example, the August reject rate for mechanized resale residence orders was 13.90 percent on a volume of 31,133 orders. The August reject rate for mechanized UNE-P orders was 15.96 percent on a volume of 50,457. Given DOJ's conclusion that the Louisiana and Georgia markets are "fully and irreversibly open to competition for resale" providers, DOJ Evaluation at 38, the fact that the reject rates for resale and UNE-P orders are comparable provides further evidence corroborating that the reject rate for UNE-P orders is not an impediment to CLEC competition.

23. In addition, there is a wide variation in the reject rates for individual CLECs. In the chart below, the top 10 CLECs by volume in both Georgia and Louisiana for August show reject rates ranging from 5.76% to 57.73%.

Aggregate % Rejects Results by CLEC
(All Products)
Georgia August 2001

CLEC	Total Rejects	Total LSRs	% Rejects
A	15314	79325	19.31%
B	4434	17602	25.19%
C	476	7368	6.46%
D	1987	6949	28.59%
E	1317	6908	19.06%
F	1680	6093	27.57%
G	976	4939	19.76%
H	1726	4804	35.93%
I	2219	3844	57.73%
J	459	3733	12.30%

Aggregate % Rejects Results by CLEC
(All Products)
Louisiana August 2001

CLEC	Total Rejects	Total LSRs	% Rejects
K	1092	9301	11.74%
L	298	4906	6.07%
M	609	2824	21.57%
N	367	2727	13.46%
O	864	2436	35.47%
P	620	1909	32.48%
Q	109	1894	5.76%
R	202	1868	10.81%
S	551	1398	39.41%
T	106	1285	8.25%

24. As shown above, CLEC claims based on allegations that BellSouth rejects a "significant amount" of orders are incorrect. Similarly, claims that flow from that incorrect allegation, such as DOJ's observation that incorrectly rejected orders impose delays and costs on CLECs, are not applicable because BellSouth does not reject an inappropriate percentage of CLEC orders.

FLOW THROUGH

25. Once CLEC orders enter BellSouth's mechanical systems, they flow through at a high rate, further minimizing the amount of actual manual handling in Georgia and Louisiana. Both the Georgia and Louisiana Commissions assess penalties for failure to meet the Percent Flow Through benchmarks. The "Percent Flow Through" category under the BellSouth plan measures those orders that are designed to flow through and that do. It excludes CLEC errors. For these measures, BellSouth's performance has been improving. For resale residence orders, BellSouth performance improved from 87.52% in June to 90.39% in September. For resale business orders, flow through

improved from 57.11% in June to 68.47% in September. For UNEs, flow through increased from 70.70% in June to 79.33% in September.

26. BellSouth measures and reports a multitude of data in connection with its flow through report. This includes sufficient data on flow through to allow comparisons of BellSouth flow through to flow through in both Verizon and SBC states. Verizon's percent flow though measure divides the number of valid local service requests ("LSRs") by the number of service orders issued, and excludes CLEC errors or a pending order status. Verizon's measure is broader and results in a lower percentage flow through than SBC's, because SBC excludes planned order fallout for manual handling from its measure.

27. The following table compares BellSouth's Achieved Flow Through to Verizon's Flow Through using the methodology used by Verizon in its 271 applications:

	Verizon (PA)	Verizon (MA)	BellSouth
Resale	56%	46% to 49%	74% to 81%
UNE	54%	51% to 55%	58% to 69%
UNE-P	70%	66% to 71%	64% to 80%[5]

28. BellSouth's flow through rate is comparable to or higher than the flow through rate in states using the Verizon flow through measure. This means that relatively fewer orders drop out of BellSouth's systems for manual handling. It also means that relatively

[5] *** ***

more CLEC orders are processed mechanically, extending the benefit of the most efficient processing to more CLEC orders.

29. The following table compares BellSouth's Percent Flow Through to SBC's flow-through rates using the methodology used by SBT in its 271 applications:

	SBC (TX)	SBC (KS)	SBC (OK)	BellSouth
LEX/LENS	97% to 98%	89% to 91%	80% to 89%	81% to 90%
Cited in FCC Order			70% to 80%	
EDI/EDI	98% to 99%	54% to 92%	89% to 95%	71% to 82%
Cited in FCC Order		61% to 97%		
EASE	97% to 98%	92% to 96%	93% to 96%	
TAG				69% to 85%

30. BellSouth's flow through rate is comparable to the rate of 271 approved states using the SBC flow through measure. Note that the SBC measure excludes orders that can be accepted mechanically but that are manually handled, which generally results in higher flow through levels, but may not give the same degree of insight into the amount of actual manual handling. As noted above, BellSouth's flow-through rates based on the Verizon flow-through measure is relatively high, which underscores the relatively low level of orders requiring manual handling by BellSouth.

31. DOJ notes Birch's claim that manual handling by BellSouth renders Birch's mechanized ordering systems "almost useless." DOJ Evaluation at 20-21 citing Birch Comments at 22. However, even when orders that are submitted mechanically do

fallout for manual handling, BellSouth still returns reject and firm order confirmation ("FOC") notices mechanically to the CLEC. In other words, the manual handling on BellSouth's end of the ordering systems does not necessarily have any effect on a CLEC's ability to use its own mechanized systems.

32. Additionally, BellSouth's systems are capable of flowing through orders at even higher rates than are currently achievable. Looking at the August Percent Flow Through Service Detail Report, using the Percent Achieved Flow Through calculation, individual CLEC flow through rates range from 20% to 97.92%. There are over 20 individual CLECs with achieved flow-through rates in excess of 90%.

33. Overall, the level of manual handling of CLEC orders in Georgia and Louisiana is low. This is underscored by comparing manual handling in Georgia to the recent SBC application for interLATA authority in Arkansas, as the following chart illustrates:

COMPARISON OF FOCs REQUIRING MANUAL HANDLING BY BELLSOUTH (GA) AND SBC (AR) [6]						
	BellSouth (Georgia)			SBC (Arkansas)		
	Total FOCs	Partial Mech/ Non-Mech FOCs		Total FOCs	Partial Mech/ Non-Mech FOCs	
March 2001	58,721	12,264	(21%)	5,896	3,058	(52%)
April 2001	48,477	10,687	(22%)	5,881	3,103	(53%)
May 2001	66,181	16,470	(25%)	8,472	5,092	(60%)
June 2001	70,099	18,990	(27%)	8,910	4,292	(48%)
July 2001	74,685	21,137	(28%)	8,861	3,924	(44%)
August 2001	94,423	23,051	(24%)	9,231	4,173	(45%)
Totals	412,586	102,599	(25%)	47,251	23,642	(50%)

34. Again, despite the suggestion in DOJ's summary of CLEC complaints that BellSouth "is processing a large number of [CLEC] orders manually," DOJ Evaluation at 14, this evidence demonstrates that BellSouth's level of manual processing is lower than or comparable to the level of manual processing by other BOCs.[7]

[6] Source: BellSouth Monthly State Summary Report (March – August 2001) FOC Timeliness Measure (Resale/UNE – excluding duplicative UNE Other/Non-Design category). Source: SBC – Arkansas Performance Measurement Tracking Report (September 2001) Average Time to Return FOC (LEX/EOI/FAX).

[7] Because BellSouth's mechanical processing levels are relatively high, and manual handling relatively low, the underlying predicate for DOJ and CLEC assertions regarding the BellSouth manual handling is absent. *See* DOJ Evaluation at 14 (collecting cites to CLEC comments on problems created by excessive manual handling).

V. BELLSOUTH EFFICIENTLY PROCESSES MANUALLY HANDLED ORDERS

35. The next step in assessing BellSouth's OSS and manual handling is to examine the timeliness of BellSouth ordering activity. DOJ appears to concede that BellSouth processes orders in a timely fashion, but cites CLEC comments that contend otherwise. DOJ Evaluation at 17. BellSouth meets or exceeds the benchmarks established by the Georgia and Louisiana Commissions for timely processing month after month.

36. Mechanically submitted orders may either be rejected or receive a FOC. The reject notice or FOC may be returned through a purely mechanical process. However, some CLEC orders will drop out for manual handling in order to receive a reject or a FOC. This may occur because of BellSouth system errors or for planned manual fallout. Orders that are placed mechanically, but that fall out and require manual handling are treated under the partially mechanized heading. BellSouth returns reject notices and FOCs quickly, regardless of their status as mechanized or partially mechanized.

37. The benchmark in both states for returning partially mechanized rejects became 85 percent within 10 business hours in August. Prior to that, the benchmark was 85 percent within 18 business hours. BellSouth's Local Carrier Service Center ("LCSC") group that handles UNE orders is open 10 hours a day, from 8 am to 6 pm Monday through Friday. BellSouth consistently meets that standard in both states. In fact, in both Georgia and Louisiana, for May through September, BellSouth substantially exceeded every sub-metric for every month for the residence and business resale and UNE-P product categories, which represent the vast majority of the volume of orders.

The charts below demonstrate BellSouth's performance with regard to the partially mechanized rejects benchmarks in Georgia and Louisiana.

Georgia Reject Interval Partially Mechanized

	May	June	July	August
Residence Resale	97.51%	94.50%	95.50%	96.90%
Business Resale	98.14%	96.11%	95.26%	94.90%
Loop + Port Combo	97.69%	99.05%	98.34%	97.49%

Benchmark for May through July is >=85% within 18 hours and 10 hours for August

Louisiana Reject Interval Partially Mechanized

	May	June	July	August
Residence Resale	98.67%	96.59%	97.57%	95.37%
Business Resale	98.34%	96.74%	95.71%	97.67%
Loop + Port Combo	99.16%	98.01%	97.97%	99.00%

Benchmark for May through July is >=85% within 18 hours and 10 hours for August

38. The benchmark in both states for returning non-mechanized rejects is 85% in 24 hours. BellSouth consistently meets this standard. In both states, from May through September, BellSouth met every sub-metric for the residence and business resale, and UNE-P categories in every month, except for September in Louisiana, when the result was 84.13%.

39. The current benchmarks set by Georgia and Louisiana set standards for timeliness that are comparable to those set in 271 approved states. For example, the standard for

reject timeliness in Pennsylvania and Massachusetts is 95 percent in less than 2 hours for mechanized orders and 95 percent in less than 24 hours for the equivalent of BellSouth's partially mechanized orders. The standard in Texas is 5 hours for both mechanized and partially mechanized orders. The standard for mechanized rejects in Georgia and Louisiana is 97% in less than 1 hour.

40. BellSouth's performance returning partially mechanized and non-mechanized FOCs is equally good. The benchmark for returning partially mechanized FOCs in both Louisiana and Georgia is 85 percent within 10 hours. The benchmark for returning non-mechanized FOCs is 85 percent within 24 business hours.

41. For partially mechanized FOCs, BellSouth met the performance benchmark for all of the sub-metrics for every month from May to September for residence and business resale, and UNE-P orders. The following charts depict BellSouth's FOC performance in both Georgia and Louisiana for May through August for these services.

Georgia FOC Timeliness Partially Mechanized

	May	**June**	**July**	**August**
Residence Resale	97.26%	93.50%	95.82%	94.52%
Business Resale	96.26%	96.10%	95.28%	92.39%
Loop + Port Combo	97.54%	98.56%	98.66%	97.99%

Benchmark for May through July is >=85% within 18 hours and 10 hours for August

Louisiana FOC Timeliness Partially Mechanized

	May	June	July	August
Residence Resale	96.60%	95.04%	93.84%	96.05%
Business Resale	97.23%	95.30%	97.49%	95.00%
Loop + Port Combo	86.91%	96.76%	93.08%	93.93%

Benchmark for May through July is >=85% within 18 hours and 10 hours for August

42. The current benchmarks set by Georgia and Louisiana set standards for FOC timeliness that are comparable to those set in 271 approved states. For example, the standard for FOC timeliness in Pennsylvania and Massachusetts is 95 percent in less than 2 hours for mechanized orders and 95 percent in less than 24 hours for the equivalent of BellSouth's partially mechanized orders. The standard in Texas includes a mix of both mechanized and partially mechanized orders and requires that 95 percent of FOCs be returned in less than 5 hours. In Georgia and Louisiana, the standard for returning mechanized FOCs is 95% in 3 hours.

43. Of CLEC UNE orders submitted mechanically to BellSouth in September, approximately 70 percent flowed through mechanically. As discussed above, a larger percentage of CLEC UNE orders flow through in Georgia and Louisiana than in states using the Verizon measure. As shown above, for the 30 percent of orders that are handled manually, they are processed quickly.

VI. BELLSOUTH MANUAL HANDLING ACCURACY PROVIDES CLECS WITH A MEANINGFUL OPPORTUNITY TO COMPETE

44. The DOJ notes the potential competitive effects of manual order processing, citing to BellSouth's performance under its Service Order Accuracy measurement. DOJ Evaluation at 18-21. For this, the DOJ relies on the disaggregated data provided by BellSouth. It is important to understand how BellSouth's Service Order Accuracy measurement is derived in order to understand the conclusions that can be drawn from the results associated with this measure. While the overall measure is statistically valid, the disaggregated data relied on by the DOJ does not provide a statistically valid means of assessing service order accuracy.

45. The Service Order Accuracy measure reflects the result of a comparison of a statistically valid sample of service orders, completed during a monthly reporting period, to the original account profile and the order sent to BellSouth by the CLEC. A sampled service order is considered to be error free if all service attributes and account detail changes completely and accurately reflect the activity specified on the original order and any supplemental CLEC order.

46. Pursuant to the Service Quality Measurement ("SQM") Plan, results for the Service Order Accuracy measure are reported in a disaggregated fashion. Specifically, results are reported for a series of products, further disaggregated by whether the service order contains fewer than 10, or 10 or more, circuits and whether the order required a dispatch or not. Product disaggregation for the Service Order Accuracy measure is as follows: Resale Residence, Resale Business, Resale Design (Specials), UNE Design (Specials), UNE Non-design and Local Interconnection Trunks.

47. For purposes of reporting performance for Georgia, results based solely on the Georgia sample are used. For purposes of reporting performance for Louisiana, regional results are reported.

48. Although BellSouth reports Service Order Accuracy results by product to fulfill the requirements of the SQM, it is important to note that the sampling process used for this measure is a "stratified systematic random sample for proportions" designed to have a +/- 5% sampling precision (margin of error) at the 95% level of confidence. One quality of the sampling process used for the Service Order Accuracy measure is that only the total, non-disaggregated weighted average results will have the desired sampling precision. Reports for individual strata (reported as disaggregated products) are instructive but cannot be used as statistically significant indications of the quality of the service orders within that disaggregation.

49. Consequently, while BellSouth's reported disaggregated Service Order Accuracy results from May through September range from 0% orders provided accurately for certain low volume disaggregations to 100% orders provided accurately for other disaggregations, a more accurate, statistically valid, read on BellSouth's success in provisioning service orders accurately should be drawn from an examination of <u>overall</u> results for both the regional measure, used for Louisiana, and the Georgia measure. Those results are as follows:

Statistically Valid Service Order Accuracy Rates[8]

	Georgia	Regional
March, 2001	88.4%	Not Produced
April, 2001	85.9%	Not Produced
May, 2001	92.4%	95.0%
June, 2001	89.7%	90.6%
July, 2001	78.3%	79.8%
August, 2001	76.4%	83.8%
September, 2001	90.7%	91.6%
Average	86.2%	87.7%

50. BellSouth's process to measure Service Order Accuracy involves detailed checking and comparison of numerous service and account impacting fields on each sampled service order. For example, BellSouth checked 84,943 individual service order fields as it conducted its audit of July 2001 sampled orders for reporting in August. It is significant to note that of those 84,943 fields checked, only 372 or .44% were found to be incorrect in such a manner as to impact service attributes or account detail. Results for August-sampled orders, reported in September were even better as a check of 61,007 fields yielded only 195 service or account impacting errors for an error rate of .32%. These excellent results are masked by the operation of the Service Order Accuracy measure, which throws a sampled order into the error category if even a single service or account impacting field error is discovered.

[8] Source: BellSouth Monthly State Summary Report (March – September 2001). Percentage was calculated from Service Order Accuracy Measure and reflects the total number of accurate orders as a percentage of the total Resale, UNE, and Interconnection orders in the sample.

51. The trend in the data since July reflects significant improvement. This trend is expected to continue as a result of the company's continuing efforts to improve service order accuracy are realized. Further, as is clear from an examination of the field-by-field verification results, BellSouth is quite successful in populating the vast majority of the service or account impacting information on the service order correctly. Finally, based on the record in this proceeding, there is no reason to believe that BellSouth's performance is impacting competition in any significant way. Downstream measures like "Invoice Accuracy" and "Percent Provisioning Troubles within 30 Days" show strong performance; if service order accuracy were a problem, these two measures would reflect its impact. They do not.

52. Notwithstanding the benchmarks chosen by the state commissions and BellSouth's performance related to them, it is instructive to consider the accuracy with which BellSouth completes CLEC orders with the accuracy with which BellSouth retail orders are completed. The table above shows CLEC average service order accuracy rate for the past seven months based on the total number of accurate CLEC orders as a percentage of total CLEC orders that comprised the monthly sample used to calculate results under the Service Order Accuracy measure in Georgia.

53. During the seven-month period from March 2001 through September 2001, the CLEC average service order accuracy rate in Georgia ranged from 76.4% to 92.4%. The average rate for the CLECs during this time period was 86.2%. Regional data ranged from 79.8% to 95.0%, with a regional average of 87.7%. An average service order

accuracy rate of between 86.2% and 87.7% is indicative of performance by BellSouth that is considerably better than that alluded to by commenters, including the DOJ.

54. Although a service order accuracy rate of 86.2% falls short of the Georgia Commission's 95% benchmark, the accuracy with which BellSouth completes CLEC orders is comparable to the service order accuracy rate achieved for BellSouth retail as illustrated below. The table below calculates the monthly service order accuracy rate as reported for BellSouth's Consumer and Mid-Market/Large Business customer operating units.

	Retail Service Order Accuracy[9]					
	Consumer		**Mid-Market/Large Business**		**Total**	
March 2001	***	***%	***	***%	***	***%
April 2001	***	***%	***	***%	***	***%
May 2001	***	***%	***	***%	***	***%
June 2001	***	***%	***	***%	***	***%
July 2001	***	***%	***	***%	***	***%
August 2001	***	***%	***	***%	***	***%
September 2001	***	***%	***	***%	***	***%
TOTALS	***	***%	***	***%	***	***%

55. The retail service order accuracy rates are not calculated using a sample (as is the case with CLEC performance), but were derived from monthly reports from BellSouth's Service Order Communications System and represent the total number of retail

[9] Consumer Service Order Accuracy measure is obtained from a monthly report from BellSouth Service Order Communications System, which provides the total number of transactions divided by the total number of transactions in error, which include the following errors: (1) errors that will not flow through any system until cleared; (2) errors that impact assignment of correct facilities for the customers; (3) errors that violate the format required by the Standard Service Order; (4) errors that impact a customer's directory listing; and (5) errors that affect billing.

transactions divided by the total number of transactions in error for each customer operating unit. The retail service order accuracy rate ranged from *** ***% to *** ***% from March 2001 through September 2001. The average rate for BellSouth retail during this seven-month period was *** ***.[10]

56. Notwithstanding differences in the way in which the retail and CLEC service order accuracy rates are calculated, the point is that BellSouth's performance in accurately completing its retail orders (as measured in the manner used by BellSouth's retail organizations) is also below the 95% level established for BellSouth's wholesale performance. Furthermore, at least as reflected by the manner by which BellSouth measures service order accuracy for its retail customers, BellSouth's accuracy in handling retail orders is comparable to its handling of CLEC orders.

57. As to specific complaints made in this proceeding, only Birch raised questions concerning the accuracy of BellSouth ordering process in Georgia. Birch's allegation is addressed below. Notably, the Georgia PSC dismissed those concerns, at least in part, because CLECs did not provide any specific information to back up their charges. Georgia PSC Comments at 101.

58. WorldCom asserts that UNE-P orders that fall out for manual handling are prone to lose dial tone because BellSouth service representatives may not enter the necessary

[10] To be sure there are differences in how the service order accuracy rate for the CLECs and BellSouth retail are calculated, which makes an "apples-to-apples" comparison impossible. For example, the retail measure does not compare the retail customer's order with what appears on the customer's bill, as is the case for the CLEC service order accuracy measure. As a result, there are "errors" captured in the retail calculation that would not appear as an "error" in the CLEC calculation. By the same token, if a BellSouth service representative taking an order from a retail customer puts down the wrong service but the order is placed correctly, this "error" likely would not be captured in BellSouth's retail service order accuracy rate, although such an "error" would be reflected in the CLEC measure.

codes to keep the disconnect and new connect orders associated. The DOJ appears to attribute this problem to BellSouth's two-order process for provisioning UNE-P orders. DOJ Evaluation at 21. It is interesting to note that the Texas process that the DOJ endorsed for provisioning UNE-P orders involved a three-step process. Texas 271 Order ¶¶ 198, 199.

59. The Georgia commission carefully considered WorldCom's argument on loss of dial tone and rejected it. The Georgia PSC concluded that disconnects occur on well under 1 percent of WorldCom's UNE-P orders. Georgia PSC Comments at 135.

60. BellSouth's analysis of WorldCom's UNE-P Loss of Dial Tone Data filed in this proceeding by Ms. Lichenberg indicates only .5% of those reports can potentially be related to UNE-P conversion activity. BellSouth's detailed analysis is presented in Mr. Ainsworth's reply affidavit in this proceeding. Mr. Ainsworth's initial and reply affidavits discusses the steps BellSouth has taken to prevent inadvertent disconnects.

61. Birch discusses a single example of an order that was provisioned inaccurately. That order is described in Birch's Sauder affidavit at pages 11-12. On that order, Birch alleges that a BellSouth service representative mistakenly provisioned four features and incorrectly set up the ordered hunt group. Birch's single example of provisioning errors on an order involving the creation of a hunt group is hardly proof of a systemic problem. In order to assess the overall impact of this problem on Birch, BellSouth calculated the number of calls Birch made to the LCSC to challenge features not correctly provisioned in September. Out of *** *** orders Birch submitted to

BellSouth, Birch made *** *** calls to the LCSC complaining of features being left off the order. Of these *** ***, BellSouth determined that *** *** were valid order issuance errors. This means that over 99% of the orders were issued correctly.

62. As before the Georgia commission, CLECs have failed to point to any evidence of systematic issues with the accuracy of BellSouth's provisioning activities.

VII. BELLSOUTH'S OSS ARE AVAILABLE

63. In their Comments, CLECs complain about the availability of BellSouth's interfaces. The DOJ, on pages 25-26 of its Evaluation, comments on BellSouth's method of reporting outages, as well as referrs to several of the CLEC complaints. BellSouth's SQM results, however, which take into account all outages (even those less than 20 minutes) show that BellSouth is performing very well.[11] In addition, BellSouth's SQM measures are substantially the same as the interface availability measures that this Commission has seen from Verizon and SBC. BellSouth's performance compares very well with the level of performance that these ILECs demonstrated in their successful 271 applications.[12]

64. BellSouth's recent performance on the monthly interface availability measurement has been excellent. The duration of the outages have been steadily decreasing, and, when outages do occur, BellSouth has procedures and processes in place to address outages

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[11] The SQM measures full outages only.

[12] In New York, the benchmark was 99.5% of the "prime-time hours" (6am to 12 am), and BA consistently met it. New York 271 Order ¶ 155. In Texas, the benchmark was 99.5% availability, and SWBT met it all but one of the last 6 months (when it was 98.5%). Texas 271 Order ¶ 164. In Kansas/Oklahoma, SWBT essentially met the 99.5% benchmark every month (one month was 99.4). Kansas/Oklahoma 271 Order ¶ 134, n. 371. In Massachusetts, Verizon's EDI interface was available 99.88% over a 4-month period. Massachusetts 271 Order ¶ 53, n. 154. In Pennsylvania, the numbers are listed at pages B-4 and B-5 of the Pennsylvania 271 Order.

in a timely and effective manner. In fact, from May through September, 2001, BellSouth met the 99.5% availability benchmark for every sub-metric every month in both Georgia and Louisiana.

VIII. BELLSOUTH'S OSS ARE SCALABLE

65. This Commission has indicated that the BOC's ability to scale its systems is another important factor in analyzing its ability to handle manual orders. The significant increase in UNE-P demand in Georgia over the last several months, combined with the fact that BellSouth's OSS clearly are regional, provides clear evidence regarding the capability of BellSouth's OSS to handle increased demand. From May 2001 to August 2001 the volume of UNE-P and related orders tripled, from approximately 16,000 in May to over 48,000 in Georgia.

66. Throughout this time, as demonstrated above, BellSouth continued to handle partially mechanized and non-mechanized orders in a timely and accurate fashion, even in the face of tighter benchmarks implemented in August.

67. The attached charts graphically demonstrate BellSouth's ability to handle and process the increasing demand for UNE-P related orders throughout the ordering, provisioning and repair and maintenance functions. Joint Reply, Exhibit SVA-1.

IX. BELLSOUTH HAS MET LEGITIMATE CLEC NEEDS FOR FLOW THROUGH

68. This Commission appropriately recognized in its approvals for 271 relief in other states that flow-through on *all* types of service requests is neither practical or possible (thereby answering concerns raised in regard to complex orders). As stated in Mr.

Stacy's previous affidavit of October 2, 2001 (¶ 294), BellSouth is committed to meeting this obligation to provide flow-through for as many types of CLEC requests as is practical and/or possible. Despite complaints from certain CLECs (notably AT&T's Mr. Bradbury, Decl. ¶¶ 83-85), BellSouth has demonstrated above that flow-through rates for CLEC requests are at least comparable (and better in some categories) than those of Verizon and SBC at the time of their filings in states that ultimately received 271 relief, with this Commission correctly concluding that relief may be granted if the ILEC's OSS is capable of flowing through competing carriers' requests in substantially the same time and manner as the ILEC's own.

69. BellSouth accepts and agrees that (for any of the reasons stated above) manually processed requests have inherent cost, programming resource, and time consideration issues associated with them, and, in fact, BellSouth has previously acknowledged that in public testimonies. The same considerations are true for BellSouth's own ordering processes, and if practical and/or possible, all of BellSouth's processes would be totally automated – whether CLEC-related or internal to BellSouth. However, manual processing for some orders, is unavoidable.

70. There are three general criteria for considering whether to mechanize flow-through of certain types of requests: 1) A regulatory obligation to provide mechanized ordering of a particular product or service (which may or may not lead to such requests flowing through); 2) significant volume of requests for a particular service request type suggesting mechanization as a labor-saving productivity gain; and, 3) CLEC community prioritization of a CCP change request for mechanization.

71. Of course, BellSouth can self-initiate development of mechanization and of such an enhancement flow-through when the business need is clear. The cost and resource requirements – both human and programming – are significant factors under all criteria above. Despite Mr. Bradbury's attempts to portray BellSouth as uncommitted "to significant improvement of its flow-through capability" due to lack of "cost/benefit analyses to evaluate whether it makes good business sense to program its systems to provide flow-through capability for particular types of orders" (Decl. ¶ 100), this Commission can rest assured that BellSouth indeed does employ sound business principles when making such decisions.

72. The processes for making changes in mechanization and flow-through are available to the community (particularly as defined by Criteria 2 and 3 above, and elsewhere in this affidavit and in Mr. Stacy's previous affidavit of October 2, 2001 in the discussion of BellSouth's Change Control Process).

73. BellSouth and the CLECs are jointly attempting to identify and implement methods for improving flow through in the Flow-Through Task Force, as described in Mr. Stacy's affidavit of October 2, 2001 (see ¶¶ 293, 320-325). Notwithstanding Mr. Bradbury's negative comments (Decl. ¶¶ 98-101), it is BellSouth's opinion that the joint Task Force is an effective, though not sole, component vehicle to identify and improve areas of flow-through.

X. COMMENTS SUPPORTIVE OF BELLSOUTH'S OSS

74. Several CLECs who are actually competing in the local market provide evidence that BellSouth's systems are meeting their needs and allowing them a meaningful opportunity to compete in the local market.