

Level of Disaggregation by Metric									
No.	Measure	Interface	Product	Volume	Time Interval	Dispatch Status	Geography State Region		Mechanization
P-4	Order Completion Interval		X	X	X	X	X	X	
P-5	Average Completion Notice Interval (Electronic)		X		X	X	X	X	X
P-6C	Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order		X			X	X	X	
P-6	Coordinated Customer Conversions Interval		X		X		X	X	
P-6A	Coordinated Customer Conversions Hot Cut Timeliness % within Interval & Average Interval		X		X		X	X	
P-6B	Coordinated Customer Conversions - Average Recovery Time		X				X	X	
P-7	Cooperative Acceptance Testing(% xDSL Loops Successfully Tested)		X				X	X	
P-8	% Provisioning Troubles within 30 days		X	X		X	X	X	
P-9	Total Service Order Cycle Time		X	X	X	X	X	X	X
P-10	LNP - Percent Missed Installation Appointments		X	X		X	X	X	



Level of Disaggregation by Metric									
No.	Measure	Interface	Product	Volume	Time Interval	Dispatch Status	Geography		Mechanization
							State	Region	
B-6	Mean Time to Deliver Usage							X	
B-7	Recurring Charge Completeness		X					X	
B-8	Non-Recurring Charge Completeness		X					X	
	% Billing Errors Corrected in X Days								
<b>OS/DA</b>									
OS-1	Average Speed to Answer (OS)						X		
OS-2	% Answered in "X" Seconds (OS)						X		
DA-1	Average Speed to Answer (DA)						X		
DA-2	% Answered in "X" Seconds (DA)						X		
<b>Database Update Information</b>									
D-1	Average Update Interval for DA Database for Facility Based CLECs						X		
D-2	Percentage DA Database Accuracy For Manual Updates						X		
D-3	Percent NXKs loaded and Tested by/or prior to the LERG effective date							X	
<b>911</b>									
E-1	Timeliness						X	X	
E-2	Accuracy						X	X	
E-3	Mean Interval				X		X	X	
<b>Trunk Group Performance</b>									
TGP-1	Trunk Group Performance - Aggregate				X		X		

Level of Disaggregation by Metric									
No.	Measure	Interface	Product	Volume	Time Interval	Dispatch Status	Geography State	Region	Mechanization
TGP-2	Trunk Group Performance - Specific				X		X		
Collocation									
C-1	Average Response Time		X				X		
C-2	Average Arrangement Time		X				X		
C-3	% of Due Dates Missed		X				X		
Change Management/Interface Outages									
CM-1	Timeliness of Change Management Notices							X	
CM-2	Average Delay Days for Change Management Notices							X	
CM-3	Timeliness of Documents Associated with Change							X	
CM-4	Average Delay Days for Documentation							X	
CM-5	Average Notice of Interface Outage	X						X	

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
<b>Preordering</b>					
OSS-1	Average Response Time and Response Interval (Pre-Ordering)	Region	Parity + 4 Seconds	Region	Parity + 2 Seconds
OSS-2	Interface Availability (Pre-Ordering)	Region	≥ 99.5%	Region	≥ 99.5%
OSS-3	Interface Availability (Maintenance & Repair)	Region	≥ 99.5%	Region	≥ 99.5%
OSS-4	Response Interval (Maintenance & Repair)	Region	Parity	Region	Parity
PO-1	Loop Make Up - Average Response Time - Manual	Loops	95% in 3 Business Days	Loops	95% in 3 Business Days
PO-2	Loop Make Up - Average Response Time - Electronic	Loops	90% in 5 Minutes (Reassess after 6 mos - new system)	Loops	95% in 1 Minute
<b>Ordering</b>					
O-1	Acknowledgment Message Timeliness	EDI	90% w/i 30 Mins (6mos - 95% w/i 30 Mins)	EDI	95% < 30 Minutes
		TAG	95% within 30 Minutes	TAG	95% < 30 Minutes
O-2	Acknowledgment Message Completeness	EDI	100%	EDI	100%
		TAG		TAG	
O-3	Percent Flow-through Service Requests (Summary)	Residence	95%	Residence	95%
		Business	90%	Business	90%
		UNE	85%	UNE	85%
		LNP	85%	LNP	85%
O-4	Percent Flow-through Service Requests (Detail)	Residence	95%	Residence	95%
		Business	90%	Business	90%
		UNE	85%	UNE	85%
		LNP	85%	LNP	85%
O-5	Flow-through Error Analysis	N/A	N/A	N/A	N/A
O-6	CLRC LSR Information LSR Flow-Through Matrix	N/A	N/A	N/A	N/A
O-7	Percent Rejected Service Requests	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port	Diagnostic	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port	Diagnostic

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks		Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks UNE Combo Other UNE ISDN Line Splitting UNE Other Non- Design UNE Other Design EELS	
0-8	Reject Interval	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks	Fully Mechanized: 97% within 1 Hour  Partially Mechanized: 85% within 18 Hours in 3 Months 85% within 10 Hours in 6 Months  Non-Mechanized: 85% within 24 Hours	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks UNE Combo Other UNE ISDN Line Splitting UNE Other Non- Design UNE Other Design EELS	Fully Mechanized: 97% ≤ 1 Hour  Partially Mechanized: 95% ≤ 10 Hours  Non-Mechanized: 95% ≤ 24 Hours  95% ≤ 36 Hours
0-9	Firm Order Confirmation Timeliness	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design	Fully Mechanized: 95% within 3 Hours  Partially Mechanized: 85% within 18 Hours in 3 Months 85% within 10 Hours in 6 Months	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design	Fully Mechanized: 95% ≤ 3 Hours  Partial Mechanized: 95% ≤ 10 Hours  Non-Mechanized: 95% ≤ 24 Hours

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks	Non-Mechanized: 85% within 36 Hours  85% within 4 Days	2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks UNE Combo Other UNE ISDN Line Splitting UNE Other Non-Design UNE Other Design EELS	95% ≤ 48 Hours
0-10	Service Inquiry with LSR Firm Order Confirmation (FOC) - Response Time Manual	xDSL (includes UNE unbundled ADSL, HDSL and UNE Unbundled Copper Loops) Unbundled Interoffice Transport	95% Returned within 5 Business Days	xDSL (includes UNE unbundled ADSL, HDSL and UNE Unbundled Copper Loops) Unbundled Interoffice Transport	95% Returned ≤ 5 Business Days
0-11	FOC and Reject Response Completeness	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks	95% Returned	Resale Residence Resale Business Resale Design (Special) Resale PBX Resale Centrex Resale ISDN LNP Standalone 2w Analog Loop Design 2w Analog Loop Non-Design 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations Switch Ports UNE xDSL (ADSL, HDSL, UCL) Line Sharing Local Interoffice Transport Local Interconnection Trunks UNE Combo Other UNE ISDN	95% Returned

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
				Line Splitting UNE Other Non-Design UNE Other Design RELS	
0-12	Speed of Answer in Ordering Center	CLEC - Local-Carrier Service Center BellSouth - Business Service Center - Residence Service Center	Diagnostic	CLEC - Local Carrier Service Center BellSouth - Business Service Center - Residence Service Center	Parity with Retail
0-13	LNP-Percent Rejected Service Request	LNP UNE Loop with LNP	Diagnostic	LNP UNE Loop with LNP	Diagnostic
0-14	LNP-Reject Interval Distribution & Average Reject Interval	LNP UNE Loop with LNP	Fully Mechanized: 97% within 1 Hour Partially Mechanized: 85% < 18 Hours Non-Mechanized: 85% < 24 Hours	LNP UNE Loop with LNP	Fully Mechanized: 97% < 1 Hour Partially Mechanized: 95% < 10 Hours Non-Mechanized: 95% < 24 Hours
0-15	LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval	LNP UNE Loop with LNP	Fully Mechanized: 95% within 3 Hours Partially Mechanized: 85% < 18 Hours (10 hours after 6 months) Non-Mechanized: 85% < 36 Hours	LNP UNE Loop with LNP	Fully Mechanized: 95% within 3 Hours Partially Mechanized: 95% < 10 Hours Non-Mechanized: 95% < 24 Hours
Provisioning					
P-1	Mean Held Order Interval & Distribution Intervals	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone)  2w Analog Loop Design  2w Analog Loop Non-Design   UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations  UNE Switch Ports	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop < DS1 Retail Digital Loop > DS1 Retail Res and Bus	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone)  2w Analog Loop Design  2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop < DS1 Retail Digital Loop > DS1 Retail Res and Bus

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing  Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Bus (POTS) Retail Res and Bus and Design Disp.  ADSL provided to Retail  Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail	UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing  Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design SELs	Retail Res and Bus (POTS) Retail Res and Bus and Design Disp.  ADSL provided to Retail  Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail  TBD Retail Res and Bus Retail Design TBD
P-2	Average Jeopardy Notice	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone)  2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations  UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport	95% ≥ 48 Hours	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone)  2w Analog Loop Design  2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport	95% ≥ 48 Hours

Service Quality Measures					
Disaggregation and Standards					
No.	Measure	BellSouth Proposed:		Commission Approved:	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
P-2	Percentage of Orders Given Jeopardy Notices	(Unbundled Interoffice Transport) Local Interconnection Trunks Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus (POTS) Retail Res & Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res & Bus (POTS) and Design Disp. ADSL provided to Retail Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail	(Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design EELs Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design EELs	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus (POTS) Retail Res & Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus Retail Res & Bus (POTS) Retail Res & Bus and Design Disp. ADSL provided to Retail Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice Parity with Retail TBD

<b>Service Quality Measures Disaggregation and Standards</b>					
No.	Measure	<b>Bellsouth Proposed</b>		<b>Commission Approved</b>	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
					Retail Res and Bus Retail Design TBD
P-3	Percent Missed Installation Appointments	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone)  2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations  UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res & Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res & Bus and Design Disp. ADSL provided to Retail Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone)  2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design BELs	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus (POTS) Retail Res & Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders) Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 Retail Digital Loop > DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res & Bus and Design Disp. ADSL provided to Retail Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail  TBD Retail Res and Bus Retail Design TBD
P-4	Average Completion Interval (OCI) & Order Completion Interval Distribution	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations  UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Res & Bus (POTS) Retail Res& Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp.  7 Days w/o conditioning  14 Days w/ conditioning  Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design ERLs	Retail Res & Bus (POTS) Retail Res& Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res & Bus and Design Disp.  5 Days w/o conditioning  12 Days w/conditioning  Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail  TBD Retail Res and Bus Retail Design TBD
P-5	Average Completion Notice Interval	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus (POTS) Retail Res& Bus Dispatch Retail Res and Bus (POTS excluding switch	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus (POTS) Retail Res& Bus Dispatch Retail Res and Bus (POTS excluding switch

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark based orders)	Disaggregation	Analog/Benchmark based orders)
		UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations  UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp.  ADSL provided to Retail  Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design ERLs	Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp.  ADSL provided to Retail  Retail ISDN - BRI  ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail  TBD Retail Res and Bus Retail Design TBD
P-6	Coordinated Customer Conversions Interval	Unbundled Loops w INP Unbundled Loops w LNP	95% ≤ 15 Minutes 95% ≤ 15 Minutes	Unbundled Loops w INP Unbundled Loops w LNP	95% ≤ 15 Minutes 95% ≤ 15 Minutes
P-6A	Coordinated Customer Conversions Hot Cut Timeliness & within Interval and Average Interval	SL1 Time Specific SL1 Non Time Specific SL2 Time Specific SL2 Non Time Specific SL1 IDLC SL2 IDLC	95% + or - 15 minutes of Scheduled Start Time  95% w/in 4 Hour window 95% w/in 4 Hour window	SL1 Time Specific SL1 Non Time Specific SL2 Time Specific SL2 Non Time Specific SL1 IDLC SL2 IDLC	95% + or - 15 minutes of Scheduled Start Time  95% w/in 4 Hour window 95% w/in 4 Hour window
P-6B	Coordinated Customer Conversions - Average Recovery Time	Unbundled Loops w/ INP Unbundled Loops w/LNP	Diagnostic Diagnostic	Unbundled Loops w/ INP Unbundled Loops w/LNP	Diagnostic Diagnostic
P-6C	Coordinated Customer Conversions - % Provisioning Troubles Received W/i 7 days of a	UNE Loop Design UNE Loop Non-Design Dispatch/Non-Dispatch	≤ 5%	UNE Loop Design UNE Loop Non-Design Dispatch/Non-Dispatch	≤ 5%

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
P-7	Cooperative Acceptance Testing - % of xDSL Loops Tested	UNE xDSL - ADSL - HDSL - UCL - OTHER	95% of Lines Tested	UNE xDSL - ADSL - HDSL - UCL - OTHER	95% of Lines Successfully Tested
P-8	% Provisioning Troubles within 30 days of Service Order Completion	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations  UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp.  ADSL provided to Retail  Retail ISDN - BRI  ADSL provided to Retail Retail DSL and DS3 Interoffice  Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design  2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non- Design UNE Other Design EELs	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res & Bus (POTS) Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based orders)  Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp.  ADSL provided to Retail  Retail ISDN - BRI  ADSL provided to Retail Retail DSL and DS3 Interoffice  Parity with Retail  TBD Retail Res and Bus Retail Design TBD
P-9	Total Service Order Cycle Time (TSOCT)	Resale Residence Resale Business Resale Design	Diagnostic	Resale Residence Resale Business Resale Design	Diagnostic

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DSL UNE Digital Loop ≥ DSL UNE Loop + Port Combinations  UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks		Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DSL UNE Digital Loop ≥ DSL UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks UNE Line Splitting UNE Other Non-Design UNE Other Design EELs	
P-10	LNP -Percent Missed Installation Appointments	LNP	95% Due Dates Met	LNP	95% Due Dates Met
P-11	LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	LNP	95% < 15 Minutes	LNP	95% < 15 Minutes
P-12	LNP-Total Service Order Cycle Time	LNP	Diagnostic	LNP	TBD
M&R-1	Missed Repair Appointments	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Res & Bus Dispatch Retail Res & Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	2w Analog Loop Design 2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Res & Bus Dispatch Retail Res & Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail
M&R-2	Customer Trouble Report Rate	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop > DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop >DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail
M&R-3	Maintenance Average Duration	Resale Residence Resale Business Resale Design	Retail Residence Retail Business Retail Design	Resale Residence Resale Business Resale Design	Retail Residence Retail Business Retail Design

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
		Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail
M&R-4	Percent Repeated Troubles w/i 30 days	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
M&R-5	Out of Service > 24 Hours	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2w Analog Loop Design  2w Analog Loop Non-Design  UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations UNE Switch Ports UNE Combo Other  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN UNE Line Sharing Local Transport (Unbundled Interoffice Transport) Local Interconnection Trunks	Retail Residence Retail Business Retail Design Retail PBX Retail Centrex Retail ISDN Retail Res and Bus Dispatch Retail Res and Bus (POTS excluding switch based features) Retail Digital Loop <DS1 Retail Digital Loop ≥DS1 Retail Res and Bus  Retail Res & Bus (POTS) Retail Res and Bus and Design Disp. ADSL provided to Retail  Retail ISDN - BRI ADSL provided to Retail Retail DS1 and DS3 Interoffice  Parity with Retail
M&R-6	Average Answer Time - Repair Centers	Region	Parity with Retail	Region	Parity with Retail
M&R-7	Meantime to Notify CLEC of Network Outages	BellSouth Aggregate CLEC Aggregate CLEC Specific	Parity by Design	BellSouth Aggregate CLEC Aggregate CLEC Specific	Parity by Design
Billing					
B-1	Invoice Accuracy	Resale UNE Interconnection	Parity with BST Retail Aggregate	Resale UNE Interconnection	Parity with BST Retail Aggregate
B-2	Mean Time to Deliver Invoices	Resale UNE Interconnection	CRIS-based invoices will be released for delivery w/i six (6) business days CABS-based invoices will be released for delivery w/i eight (8) calendar days CLEC Average Delivery Intervals for both CRIS and CABS invoices are comparable to BellSouth Average delivery for both systems.	Resale UNE Interconnection	CRIS-based invoices will be released for delivery w/i six (6) business days CABS-based invoices will be released for delivery w/i eight (8) calendar days CLEC Average Delivery Intervals for both CRIS and CABS invoices are comparable to BellSouth Average delivery for both systems.
B-3	Usage Data Delivery Accuracy	Region	Parity with Retail	State, Region	Parity with Retail

<b>Service Quality Measures Disaggregation and Standards</b>					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
B-4	Usage Data Delivery Completeness	Region	Parity with Retail	Region	Parity with Retail
B-5	Usage Data Delivery Timeliness	Region	Parity with Retail	Region	Parity with Retail
B-6	Mean Time to Deliver Usage	Region	Parity with Retail	Region	Parity with Retail
B-7	Recurring Charge Completeness	Resale UNE Interconnection	Parity 90% 90%	Resale UNE Interconnection	Parity 90% 90%
B-8	Non-Recurring Charge Completeness	Resale UNE Interconnection	Parity 90% 90%	Resale UNE Interconnection	Parity 90% 90%
<b>OSDA</b>					
OS-1	Speed to Answer Performance/Average Speed to Answer (Toll)	None	Parity by Design	None	Parity by Design
OS-2	Speed to Answer Performance/Percent Answered within "X" Seconds (Toll)	None	Parity by Design	None	Parity by Design
DA-1	Speed to Answer Performance/Average Speed to Answer (DA)	None	Parity by Design	None	Parity by Design
DA-2	DA-2. Speed to Answer Performance/Percent Answered within "X" Seconds (DA)	None	Parity by Design	None	Parity by Design
<b>Database Update</b>					
D-1	Database Update - Interval and Average Interval	LIDB Directory Listing Directory Assistance	Parity by Design	LIDB Directory Listing Directory Assistance	Parity by Design
D-2	Database Update - % Accuracy	LIDB Directory Listing	95% Accurate 95% Accurate	LIDB Directory Listing	95% Accurate 95% Accurate
D-3	NIX and LRNs Loaded by LERG Effective Date	Region	100% by LERG effective date	Region	100% by LERG effective date
<b>E911</b>					
E-1	Timeliness	None	Parity by Design	None	Parity by Design
E-2	Accuracy	None	Parity by Design	None	Parity by Design
E-3	Mean Interval	None	Parity by Design	None	Parity by Design
<b>Trunk Group Performance</b>					
TGP-1	Trunk Group Performance-Aggregate	CLEC Aggregate BellSouth Aggregate	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth	CLEC Aggregate BellSouth Aggregate	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth
TGP-2	Trunk Group Performance-CLEC Specific	CLEC Trunk Group BellSouth Trunk Group	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth	CLEC Trunk Group BellSouth Trunk Group	Any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1,3,4,5,10, 16 for CLECs and 9 for BellSouth

<b>Service Quality Measures Disaggregation and Standards</b>					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
<b>Collocation</b>					
C-1	Average Response Time	Virtual - Initial Virtual - Augment Physical Caged - Initial Physical Caged - Augment Physical Cageless - Initial Physical Cageless - Augment	Virtual-15 Calendar Days Physical Caged - 15 Calendar Days Physical Cageless - 15 Calendar Days	Virtual - Initial Virtual - Augment Physical Caged - Initial Physical Caged - Augment Physical Cageless - Initial Physical Cageless - Augment	Virtual-15 Calendar Days Physical Caged - 15 Calendar Days Physical Cageless - 15 Calendar Days
C-2	Average Arrangement Time	Virtual - Initial Virtual - Augment Physical Caged - Initial Physical Caged - Augment Physical Cageless - Initial Physical Cageless - Augment	Virtual-60 Calendar Days Virtual - Augment - 45 Calendar Days (w/o Space Increase) Virtual - Augment- 60 Calendar Days (with Space Increase) Physical Caged - 90 Calendar Days (Ordinary) Physical Caged - Augment - 45 Calendar Days (w/o Space Increase) Physical Caged - Augment - 90 Calendar Days (with Space Increase) Physical Cageless - 90 Calendar Days Physical Cageless - Augment - 45 Calendar Days (w/o Space Increase) Physical Cageless - Augment - 90 Calendar Days (with Space Increase)	Virtual - Initial Virtual - Augment Physical Caged - Initial Physical Caged - Augment Physical Cageless - Initial Physical Cageless - Augment	Virtual-60 Calendar Days Virtual - Augment - 45 Calendar Days (w/o Space Increase) Virtual - Augment- 60 Calendar Days (with Space Increase) Physical Caged - 90 Calendar Days (Ordinary) Physical Caged - Augment - 45 Calendar Days (w/o Space Increase) Physical Caged - Augment - 90 Calendar Days (with Space Increase) Physical Cageless - 90 Calendar Days Physical Cageless - Augment - 45 Calendar Days (w/o Space Increase) Physical Cageless - Augment - 90 Calendar Days (with Space Increase)
C-3	Percent of Due Dates Missed	Virtual - Initial Virtual - Augment Virtual - Combined Physical Caged - Initial Physical Caged - Augment Physical Cageless - Initial Physical Cageless - Augment	≥ 90% on Time	Virtual - Initial Virtual - Augment Virtual - Combined Physical Caged - Initial Physical Caged - Augment Physical Cageless - Initial Physical Cageless - Augment	≥ 95% on Time
<b>Change Management</b>					
CM-1	Timeliness of Change Management Notices	Region	95% ≥ 30 days of Release	Region	98% on Time
CM-2	Average Delay Days for Change	Region	90% ≤ 8 Days	Region	≤ 5 Days

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation	Analog/Benchmark
CM-3	Management Notices Timeliness of Documents Associated with Change	Region	95% ≥ 30 days if new features coding is req. 95% ≥ 5 days for documentation defects, corrections or clarifications	Region	98% on Time
CM-4	Average Delay Days for Documentation	Region	90% ≤ 8 Days	Region	95% ≤ 5 Days
CM-5	Notification of Interface Outages	By interface type for all interfaces accesses by CLECs	97% in 15 Minutes	By interface type for all interfaces accesses by CLECs	97% ≤ 15 Minutes
New Metrics Approved by this Commission					
	Percent Order Accuracy	Not Proposed	Not Proposed	Resale Residence Resale Business Resale Design (Specials) UNE Specials (design) UNE (non-design) Local Interconnection Trunks	95% Accurate
	Percent Completion Attempts w/o a Notice or < 24 hours Notice	Not Proposed	Not Proposed	Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2w Analog Loop Design 2w Analog Loop Non-Design -Dispatch -Non-Dispatch 2w Analog Loop w/LNP Design 2w Analog Loop w/LNP Non-Design -Dispatch -Non-Dispatch UNE Digital Loop < DS1 UNE Digital Loop ≥ DS1 UNE Loop + Port Combinations -Dispatch out -Non-Dispatch -Dispatch in -Switch-based UNE Switch Ports UNE Combo Other -Dispatch -Non-Dispatch  UNE xDSL (ADSL, HDSL, UCL) UNE ISDN (includes UDC) UNE Line Sharing Local Transport	≤ 5%

Service Quality Measures Disaggregation and Standards					
No.	Measure	BellSouth Proposed		Commission Approved	
		Disaggregation	Analog/Benchmark	Disaggregation (Unbundled Interoffice Transport) Local Interconnection Trunks	Analog/Benchmark
	Percent Completion of Timely Loop Modification	Not Proposed	Not Proposed	N/A	95% ≤ 5 Business Days
	Percent Billing Errors Correct in X Days	Not Proposed	Not Proposed	Carrier Bill DUP	Diagnostic

V. ENFORCEMENT MEASURES FOR TIER 1 AND TIER 2

Herein, we address which measures should be included in the enforcement portion of the Florida Performance Assessment Plan. The enforcement measures are those to which penalties are applied if BellSouth fails to meet the performance standards as set by this Commission. We find that an effective enforcement plan is one that contains clearly articulated, predetermined measures and standards that encompass a comprehensive range of carrier-to-carrier performance.

Arguments

Witness Coon states that BellSouth's proposed enforcement plan generally includes key measures in areas that affect customers. The measurement set was patterned after those used in New York and Texas. According to witness Coon, BellSouth took the approach, as ordered by those Commissions, of assigning penalties only to measurements that are most "customer impacting." Applying this standard, witness Coon states that BellSouth proposes to pay Tier 1 penalties for 57 specifically identified measures. The enforcement measures are detailed in DAC-1 and summarized in DAC-5, Exhibit 16.

BellSouth believes there are several specific factors that make the proposed smaller number of Tier 1 and Tier 2 measures appropriate. The factors correspond to six categories of measurements for which penalties are not proposed. Specifically, they include the following:

1. Aggregation of Measures. Although there may be some usefulness in disaggregating measurements to a fairly granular level for purposes of making comparisons, this level of disaggregation is not always appropriate when penalties are applied. An example is xDSL services. Various xDSL services are provided over copper wires. The different services are distinguishable based upon the electronics installed by the ALEC. Given the similarity of these products, BellSouth has aggregated them together for the purpose of determining whether remedy payments are warranted. This aggregation is also appropriate to avoid the

inherent unreliability of small samples (discussed earlier), in other words, to ensure meaningful comparisons.

2. Diagnostic Measurements. There are a number of measurements included because they provide information to ALECs, but a failure to meet these measurements really has no effect on the customer. An example of this type of measurement is Percent Rejected Service Requests. This measurement could help an ALEC determine whether its service representatives are completing and issuing local service requests properly, but it does not truly reflect BellSouth's performance.
3. Method of Submission. For some measurements (reject interval, for example), BellSouth's SQM disaggregates the measure by method of submission, in other words, fully mechanized, partially mechanized and non-mechanized. In BellSouth's remedy plan, however, only the measurement for fully mechanized submission has an attendant penalty, since this is the measurement category in which virtually all activity will occur.
4. Parity by Design Measures. Certain measures are categorized as parity by design. An example of this would be the E911 measures in Exhibit DAC-1. A parity by design measure occurs when BellSouth orders and ALEC orders are processed in a way that makes it impossible for BellSouth to distinguish between the two. In these instances, discrimination is just not possible.
5. Correlated Measures. In some instances, measurements are correlated, so that the failure of one measure will also result in the failure of a second measure. BellSouth does not believe that it is appropriate to pay multiple penalties for a single failure. Therefore, it proposed that only a single penalty be associated with any measures that are correlated

6. Regional Measures. Some of BellSouth's measurements are regional in nature. Since BellSouth's OSS systems are regional, measurements such as OSS Average Response time and Response Interval and OSS Interface Availability would apply regionally, i.e., to the ALEC industry as a whole. Since the point of Tier 1 penalties is to provide penalty payments to particular affected ALECs, it makes no sense to have a penalty for a measurement that, if failed, will affect the entire ALEC industry.

In its brief, BellSouth states that the ALEC plan "stands in dramatic contrast to that of BellSouth." BellSouth states, "[t]he ALEC plan appears in every detail to have been designed to generate incredible penalties. First, the ALEC plan has a penalty associated with every single submetric."

BellSouth alleges that:

The number of submetrics in the ALECs' plan is somewhere between 100,000 and several million, which means that the ALECs' plan could require 100,000 or more penalty payments every month. Further, the ALECs' penalty plan provides for BellSouth to pay penalties any time it misses a measurement in the given month, regardless of the number of transactions that are captured by that measurement. Finally, the penalty to be paid can, based on the severity of the failure, be as much as \$25,000. Taken together, these factors (i.e., 100,000 plus measurements and a penalty of up to \$25,000 for the failure of each and every one) could result in the potential for BellSouth to pay penalties every month in amounts that are truly staggering.

BellSouth further notes that:

The massive penalties that could attach to each of the ALECs' proposed measurements bear no relationship to the damage that would be suffered by the ALECs. There is not a shred of evidence in the record that the ALECs made any attempt at all to actually tie the amounts of the penalties proposed to the damages incurred. For

example, all parties agree that there are certain diagnostic measures in the plan. As stated previously, BellSouth does not believe there should be a penalty associated with these measures [some of which measure ALECs' performance as much as they do BellSouth's]. Nevertheless, the ALEC plan assesses penalties when measures of this sort are failed.

As the ALEC witnesses admitted:

The degree of disaggregation they propose will result in many measurement categories with no activity whatsoever in a given month and many more with only slight activity. Further, in the submeasurement categories with a very small volume of activity, any failure would appear to result in a penalty. In her deposition, witness Bursh states that if a particular submeasurement captures only one event in a month and BellSouth fails to provide service at parity in this one incident, a payment will be assessed. At the time of the hearing, however, Ms. Bursh claimed that this would not occur because of the way the model treats small sample sizes. Instead, she contends that the model operates so that a single failure can never prompt a penalty. When she was referred specifically to the document attached to her testimony that deals with small sample sizes; however it became apparent that this document did not support her testimony. The document to which she referred showed that, in the context of measurements that utilize the benchmark, the benchmarks are adjusted downward if there are small sample sizes. The document attached to her testimony, however, showed no adjustment for sample sizes of less than four, only a footnote that states that 'the table can be expanded to include all possible data sizes from 1 upward.' There is absolutely nothing in this document that says that BellSouth