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March 15, 2002

Mr. William Caton
Secretary
Federal Communications Commission
The Portals
445 12th Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 02-35

Dear Mr. Caton:

We provided the attached written materials concerning service order accuracy to the Department of Justice today.

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachments and request that you place them in the record of the proceeding identified above. Thank you.

Sincerely,



Jonathan B. Banks

Attachments

cc: Renee Crittendon
Ian Dillner
Daniel Shiman
Susan Pié
James Davis-Smith



Service Order Accuracy Measurement

February 5, 2002

Pre-November Data SOA Methodology

- State-specific SOA results were only developed for Georgia, Florida, and Kentucky
- The SOA results for Louisiana and the five other BellSouth states were calculated from the aggregate results from the three states listed above.
- All service orders (SOs) generated by the LSRs associated with the originally sampled SOs, were evaluated for accuracy
 - ✓ BellSouth selected an initial sample of SOs
 - ✓ Each “original SO” was tracked back to its original associated LSR
 - ✓ All SOs (not just the original SO) associated with the LSR were extracted
 - ✓ An error on any SO associated with the LSR was counted as an error for that LSR
 - ✓ To determine performance, the total LSR count in the sample was compared to the total count of LSRs in the sample without SO errors
 - ✓ The volumes reflected on the MSS represent the volume of LSRs, not SOs

Pre-November Data SOA Methodology (cont'd)

- Statistically valid samples of SOs were selected based on the following criteria:
 - ✓ Product groups
 - ✓ <10 circuits vs. ≥ 10 circuits
 - ✓ Mechanized vs. Non-Mechanized

- The Dispatch vs. Non-Dispatch levels of disaggregation were not statistically valid because this criterion was not a factor in sampling
 - ✓ An LSR was classified as Dispatch if any associated SO required dispatch.
 - ✓ Data samples did not include all the current products, most notably UNE-P

- These issues resulted from the fact that the SOA measure was established in July 1998 and BellSouth's product offerings and electronic LSR processing capabilities had evolved, which resulted in a need for changes in the selection universe and sampling methodology.

November Data-Forward SOA Methodology

- The measurement was changed to...
 - ✓ Improve the statistical validity of the sample
 - ✓ Remain consistent with the purpose of the measure to assess accuracy of the SOs
 - ✓ Accurately include all the 24 sub-metrics (six product sets, greater or less than ten circuits and dispatched versus non-dispatched)
 - ✓ Address the existing product gaps (UNE-P)
 - ✓ Reflect the regionality of BellSouth's OSS and Work-Centers
- As a result, the following modifications were implemented:
 - ✓ Calculated the metric based on a nine state aggregate sample
 - ✓ Refocused the SOA measurement to include only sampled SOs
 - ✓ Expanded the sampling methodology to sample from all 24 sub-metric categories
 - ✓ Included all current product offerings in the data universe

Impact of the SOA Methodology Changes

- Once BellSouth understood the full extent of the issues surrounding the SO samples, we quickly worked to resolve and improve the accuracy of the sample data
- As a result of the changes implemented for the November-forward data, BellSouth has a more accurate measure
 - ✓ The increased volume from the nine-state aggregate enhances the ability of each sample category to have a statistically significant volume
 - ✓ The new sample methodology adheres to the true intent of the SOA SQM
 - ✓ Valid for all 24 sub-metrics
 - ✓ The new sample methodology reflects all product offerings
- The new SOA methodology will be audited by KPMG
- Overall results before November tended to understate performance

Service Order Accuracy Measurement



BellSouth included all current products in the data sample.

- The SOA product sampling methodology had not been updated to reflect the new product offerings. As a result, some products added were...
 - ✓ UNE Other Design,
 - ✓ UNE Other Non-Design,
 - ✓ 2 Wire Analog Loops,
 - ✓ UNE Loop and Port combinations (UNE-P),
 - ✓ UNE ISDN with LNP,
 - ✓ UNE Capable Loop with INP and without NP,
 - ✓ UNE xDSL (with its variations),
 - ✓ UNE Line Sharing,
 - ✓ LNP (Standalone),
 - ✓ DS1/DS3,
 - ✓ ISDN, and
 - ✓ Digital Loops.

* Attachment 1

Pre-November versus November forward sub-metrics comparison

Old Sub-Metric	New Sub-Metric	Old Sub-Metric	New Sub-Metric
1	Mechanized Resale Business < 10 Circuits	1	Resale Business < 10 Circuits- Dispatched
		2	Resale Business < 10 Circuits- Non Dispatched
2	Mechanized Resale Residence < 10 Circuits	3	Resale Residence < 10 Circuits- Dispatched
		4	Resale Residence < 10 Circuits- Non Dispatched
3	Mechanized Resale Business > 10 Circuits	5	Resale Business > 10 Circuits- Dispatched
		6	Resale Business > 10 Circuits- Non Dispatched
4	Mechanized Resale Residence > 10 Circuits	7	Resale Residence > 10 Circuits- Dispatched
		8	Resale Residence > 10 Circuits- Non Dispatched
5	Non-Mech Resale Business < 10 Circuits	Repeat of 1 or 2	Mechanized versus Non-Mechanized is not a sub-metric category
6	Non-Mech Resale Residence < 10 Circuits	Repeat of 3 or 4	Mechanized versus Non-Mechanized is not a sub-metric category
7	Mechanized Resale Business > 10 Circuits	Repeat of 1 or 2	Mechanized versus Non-Mechanized is not a sub-metric category
8	Mechanized Resale Residence > 10 Circuits	Repeat of 3 or 4	Mechanized versus Non-Mechanized is not a sub-metric category
9	Non-Mechanized Local Interconnection Trunks < 10 Circuits	9	Local Interconnection Trunks < 10 Circuits- Dispatched
		10	Local Interconnection Trunks < 10 Circuits- Non Dispatched
10	Non-Mechanized Local Interconnection Trunks > 10 Circuits	11	Local Interconnection Trunks > 10 Circuits- Dispatched
		12	Local Interconnection Trunks > 10 Circuits- Non Dispatched
11	Resale Design (Specials) < 10 Circuits	13	Resale Design (Specials) < 10 Circuits- Dispatched
		14	Resale Design (Specials) < 10 Circuits- Non Dispatched
12	Resale Design (Specials) > 10 Circuits	15	Resale Design (Specials) > 10 Circuits- Dispatched
		16	Resale Design (Specials) > 10 Circuits- Non Dispatched
13	UNE Specials (Design) Non-Mech < 10 Circuits	17	UNE Specials (Design) < 10 Circuits- Dispatched
		18	UNE Specials (Design) < 10 Circuits- Non Dispatched
14	UNE Specials (Design) Non-Mech > 10 Circuits	19	UNE Specials (Design) > 10 Circuits- Dispatched
		20	UNE Specials (Design) > 10 Circuits- Non Dispatched
15	UNE (Non-Design) Non-Mech < 10 Circuits	21	UNE (Non-Design) < 10 Circuits- Dispatched
		22	UNE (Non-Design) < 10 Circuits- Non Dispatched
16	UNE (Non-Design) Non-Mech > 10 Circuits	23	UNE (Non-Design) > 10 Circuits- Dispatched
		24	UNE (Non-Design) > 10 Circuits- Non Dispatched
17	UNE Design Mech GA < 10 Circuits	Repeat of 17 or 18	Mechanized versus Non-Mechanized is not a sub-metric category

Auto Number	SOA Product Classification	Original Versus Current					
		September			October		
		Old GA	Old LA	New MSS	Old GA	Old LA	New MSS
		%	%	%	%	%	%
1	Resale Residence < 10 Circuits Non-Dispatched	94.30%	95.49%	97.50%	100.00%	99.27%	98.62%
2	Resale Residence > = 10 Circuits Non-Dispatched	NV	NV	NV	100.00%	100.00%	100.00%
3	Resale Residence < 10 Circuits Dispatched	100.00%	100.00%	95.63%	NV	60.00%	96.36%
4	Resale Residence > = 10 Circuits Dispatched	NV	NV	100.00%	NV	NV	100.00%
5	Resale Business < 10 Circuits Non-Dispatched	98.04%	94.79%	95.83%	96.49%	90.84%	92.67%
6	Resale Business > = 10 Circuits Non-Dispatched	100.00%	85.71%	95.56%	100.00%	100.00%	95.08%
7	Resale Business < 10 Circuits Dispatched	100.00%	100.00%	95.83%	100.00%	72.22%	97.14%
8	Resale Business > = 10 Circuits Dispatched	NV	100.00%	82.35%	100.00%	100.00%	68.75%
9	Resale Design < 10 Circuits Non-Dispatched	NV	NV	94.40%	NV	50.00%	97.94%
10	Resale Design > = 10 Circuits Non-Dispatched	NV	NV	75.00%	NV	NV	100.00%
11	Resale Design < 10 Circuits Dispatched	83.33%	93.75%	NV	100.00%	83.33%	NV
12	Resale Design > = 10 Circuits Dispatched	NV	NV	0.00%	NV	NV	100.00%
13	UNE Design < 10 Circuits Non-Dispatched	94.74%	96.50%	100.00%	100.00%	95.56%	100.00%
14	UNE Design > = 10 Circuits Non-Dispatched	33.33%	50.00%	NV	NV	50.00%	NV
15	UNE Design < 10 Circuits Dispatched	93.10%	95.04%	98.57%	98.11%	96.04%	100.00%
16	UNE Design > = 10 Circuits Dispatched	NV	100.00%	100.00%	NV	NV	100.00%
17	UNE Non-Design < 10 Circuits Non-Dispatched	79.33%	71.18%	98.80%	90.48%	76.47%	100.00%
18	UNE Non-Design > = 10 Circuits Non-Dispatched	NV	50.00%	100.00%	50.00%	80.00%	96.67%
19	UNE Non-Design < 10 Circuits Dispatched	84.62%	81.03%	94.29%	96.36%	86.02%	89.60%
20	UNE Non-Design > = 10 Circuits Dispatched	NV	NV	96.00%	40.00%	57.14%	96.00%
	Notes:						
	NV = No Volume						
	Total of the Highlighted Categories Exceed 98% of Orders						

Auto Number	SOA Product Classification	Current Method				
		Sept	Oct	Nov	Dec	Jan
		%	%	%	%	%
1	Resale Residence < 10 Circuits Non-Dispatched	97.50%	98.62%	96.43%	100.00%	97.33%
2	Resale Residence > = 10 Circuits Non-Dispatched	NV	100.00%	NV	NV	NV
3	Resale Residence < 10 Circuits Dispatched	95.63%	96.36%	96.92%	100.00%	90.54%
4	Resale Residence > = 10 Circuits Dispatched	100.00%	100.00%	100.00%	100.00%	90.91%
5	Resale Business < 10 Circuits Non-Dispatched	95.83%	92.67%	96.26%	100.00%	93.24%
6	Resale Business > = 10 Circuits Non-Dispatched	95.56%	95.08%	93.55%	78.57%	85.00%
7	Resale Business < 10 Circuits Dispatched	95.83%	97.14%	98.57%	95.00%	87.20%
8	Resale Business > = 10 Circuits Dispatched	82.35%	68.75%	91.30%	82.35%	91.67%
9	Resale Design < 10 Circuits Non-Dispatched	94.40%	97.94%	94.55%	100.00%	96.05%
10	Resale Design > = 10 Circuits Non-Dispatched	75.00%	100.00%	96.00%	100.00%	70.00%
11	Resale Design < 10 Circuits Dispatched	NV	NV	90.00%	88.89%	97.96%
12	Resale Design > = 10 Circuits Dispatched	0.00%	100.00%	100.00%	100.00%	NV
13	UNE Design < 10 Circuits Non-Dispatched	100.00%	100.00%	100.00%	100.00%	100.00%
14	UNE Design > = 10 Circuits Non-Dispatched	NV	NV	NV	NV	NV
15	UNE Design < 10 Circuits Dispatched	98.57%	100.00%	98.50%	97.78%	100.00%
16	UNE Design > = 10 Circuits Dispatched	100.00%	100.00%	100.00%	100.00%	100.00%
17	UNE Non-Design < 10 Circuits Non-Dispatched	98.80%	100.00%	94.67%	97.00%	98.67%
18	UNE Non-Design > = 10 Circuits Non-Dispatched	100.00%	96.67%	84.48%	100.00%	99.12%
19	UNE Non-Design < 10 Circuits Dispatched	94.29%	89.60%	97.14%	98.67%	97.33%
20	UNE Non-Design > = 10 Circuits Dispatched	96.00%	96.00%	100.00%	95.71%	98.26%
	Notes:					
	NV = No Volume					
	Total of the Highlighted Categories Exceed 98% of Orders					

Non-Mech Accuracy Rate

		Sept		Oct		Nov		Dec		Jan	
Auto Number	SOA Product Classification	Population	Rate								
1	Resale Residence < 10 Circuits Non-Dispatched	148060	92.59%	128750	98.62%	154806	96.43%	132724	100.00%	130630	100.00%
2	Resale Residence > = 10 Circuits Non-Dispatched	NV	NV	1	100.00%	NV	NV	NV	NV	NV	NV
3	Resale Residence < 10 Circuits Dispatched	8204	89.66%	7106	96.36%	9288	96.97%	7806	100.00%	6998	78.26%
4	Resale Residence > = 10 Circuits Dispatched	7	100.00%	11	100.00%	16	100.00%	5	100.00%	11	50.00%
5	Resale Business < 10 Circuits Non-Dispatched	6586	92.06%	4726	92.67%	6634	98.53%	5406	100.00%	4600	85.47%
6	Resale Business > = 10 Circuits Non-Dispatched	199	95.56%	74	95.08%	31	93.10%	29	81.48%	20	85.00%
7	Resale Business < 10 Circuits Dispatched	1579	91.53%	1197	97.14%	1406	100.00%	1195	87.50%	1001	80.77%
8	Resale Business > = 10 Circuits Dispatched	23	76.92%	16	68.75%	23	93.33%	18	75.00%	14	90.91%
9	Resale Design < 10 Circuits Non-Dispatched	378	94.40%	110	97.94%	100	94.55%	85	100.00%	104	95.95%
10	Resale Design > = 10 Circuits Non-Dispatched	16	75.00%	12	100.00%	25	96.00%	7	100.00%	14	70.00%
11	Resale Design < 10 Circuits Dispatched	366	NV	609	NV	74	90.00%	92	88.89%	50	97.83%
12	Resale Design > = 10 Circuits Dispatched	1	0.00%	1	100.00%	3	100.00%	2	100.00%	NV	NV
13	UNE Design < 10 Circuits Non-Dispatched	316	100.00%	203	100.00%	57	100.00%	48	100.00%	353	100.00%
14	UNE Design > = 10 Circuits Non-Dispatched	NV	NV								
15	UNE Design < 10 Circuits Dispatched	7400	98.40%	6367	100.00%	6727	98.39%	5671	97.50%	6261	100.00%
16	UNE Design > = 10 Circuits Dispatched	25	100.00%	16	100.00%	35	100.00%	20	100.00%	29	100.00%
17	UNE Non-Design < 10 Circuits Non-Dispatched	82841	95.95%	66420	100.00%	72475	95.50%	74545	94.44%	88022	95.45%
18	UNE Non-Design > = 10 Circuits Non-Dispatched	54	100.00%	146	96.67%	58	84.48%	120	100.00%	116	100.00%
19	UNE Non-Design < 10 Circuits Dispatched	5925	97.21%	5609	89.60%	5442	96.30%	4963	98.11%	5423	96.43%
20	UNE Non-Design > = 10 Circuits Dispatched	141	95.83%	153	96.00%	101	100.00%	91	93.88%	115	98.06%
Weight Average			94.77%		95.05%		96.77%		97.26%		96.70%
Notes:											
NV = No Volume											
Total of the Highlighted Categories Exceed 98% of Orders											

**INCLUSION OF MECHANIZED ORDERS IN
SERVICE ORDER ACCURACY MEASURE**

The current Service Order Accuracy measurement (P-11) "measures the accuracy and completeness of a sample of BellSouth service orders by comparing what was ordered and what was completed." The business rules require use of "[a] statistically valid sample of service orders, completed during a monthly reporting period" By its plain terms, the measure requires BellSouth to evaluate a sample of all service orders, including mechanized orders; nothing in the measure contemplates that BellSouth would sample only partially mechanized or manual orders.

In its comments, Birch Telecom of the South, Inc. ("Birch") accuses BellSouth of "broadening the base of sampled orders to include fully mechanized orders" Birch Comments at 10. According to Birch, "The addition of fully mechanized order to the measurement completely skews the sample, as fully mechanized orders should rarely contain service order errors" Birch Comments at 10-11.

Birch's accusations are without merit, as the current Service Order Accuracy measure has always included fully mechanized orders. However, as BellSouth discovered in late 2001, BellSouth was reporting service order accuracy results based on a sample that omitted the largest category of fully mechanized orders, namely UNE-P. BellSouth corrected this omission by including mechanized UNE-P orders in the sample used to calculate service order accuracy results beginning with November 2001 data.

Birch is fully aware that the current Service Order Accuracy measure has always included fully mechanized orders, which is clear from comments filed by Birch in connection with the Georgia performance measurements workshops in Docket 7892-U. As part of these workshops, Birch proposed in September 2001 that several changes be made to the existing measures, including the current Service Order Accuracy measure. In particular, Birch proposed that the current Service Order Accuracy measure be changed to limit the sample to only "partially mechanized and manual service orders." See Birch Telecom of the South Proposed Changes to the Georgia SQM, at 11 (Sept. 10, 2001) (Exhibit 1). As Birch explained, the purpose of this change was to remove fully mechanized orders from the sampling process, because "[t]he inclusion of mechanically handled service orders greatly reduces the value of the measurement." Obviously, there would have been no need to remove fully mechanized orders from the measure if fully mechanized orders were not included in the measure in the first place, as Birch now contends.

That the current Service Order Accuracy measure has always included fully mechanized orders was underscored by BellSouth's response to Birch's proposed change. In its response, BellSouth stated as follows:

Birch proposes a modification to Measure P-11 to require a statistically valid sample of "partially mechanized and manual service orders." However, the purpose of this measure is to reflect the accuracy of BellSouth's service orders, regardless of the means by which the CLEC chooses to submit the LSR. *Thus, the measure should capture service order accuracy for all LSRs, including those that are mechanized, partially mechanized, as well as non-mechanized.*

However, because *BellSouth is sensitive to Birch's concern that the value of the current measure is "greatly reduced" by including mechanized LSRs*, BellSouth will begin reporting in the fourth quarter 2001 service order accuracy data that is disaggregated according to mechanized versus non-mechanized. This additional level of disaggregation should adequately address Birch's concerns and *should obviate any need to change the business rules for Measure P-11.*

See BellSouth Telecommunications, Inc.'s Response to Proposed Revisions to the Service Quality Measurements, Benchmarks and Analogues, and Enforcement Mechanisms, Docket 7892-U, at 19 (Sept. 24, 2001).¹

Even AT&T appears to agree that the current Service Order Accuracy measure has always included fully mechanized orders. In its comments filed in CC Docket No. 02-35, AT&T criticizes changes made by BellSouth in calculating service order accuracy results. Although such criticisms are without merit, notably absent from AT&T's filing is any claim that BellSouth "changed" the current Service Order Accuracy measure by including fully mechanized orders in the sample process. *Joint Supplemental Declaration of Cheryl Bursh and Sharon Norris*, CC Docket No. 02-35, ¶¶ 104-117.

¹ While initially objecting to Birch's proposed change (suggesting additional levels of disaggregation instead), BellSouth subsequently abandoned this approach and agreed to modify the current Service Order Accuracy measure during the Georgia workshops to remove mechanized orders in generating service order accuracy results. In particular, at the request of several CLECs, BellSouth agreed to implement a service order accuracy measure that is based on a mechanized review of certain fields on only partially mechanized orders rather than based on a statistically valid sample of all service orders. See Letter from Bennett L. Ross to Reece McAlister, Docket 7892-U, Action Item Response No. 5 (Jan. 11, 2002) (Exhibit 2). The parties have not yet reached agreement on which fields should be reviewed or whether BellSouth should continue using a sample approach for manually submitted orders. See Letter from Bennett L. Ross to Reece McAlister, Docket 7892-U (Feb. 1, 2002) (Exhibit 3).

BellSouth Telecommunications, Inc.
Legal Department
125 Perimeter Center West
Suite 376
Atlanta, GA 30346

Bennett L. Ross
General Counsel - Georgia

770 391 2416
Fax 770 391 2812

January 11, 2001

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**EXECUTIVE SECRETARY
G.P.S.C.**

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

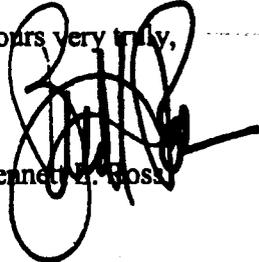
Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

Enclosed herein for filing please find an original and eighteen (18) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s responses to the action items from the Georgia Public Service Commission's workshops in the above-referenced proceeding.

I would appreciate your filing these responses and returning the three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Yours very truly,


Bennett L. Ross

BLR:nvd
Enclosures

cc: Leon Bowles
Dennis Sewell
Parties of Record

427956/427922

**GPSC Docket No. 7892-U
BellSouth Action Items – SQM Workshop – Dec. 10 – 12**

1.	OSS-2	Explain whether LFACS should not be included in new OSS-2 measure.	LFACS has been added to the OSS-2 SQM metric disaggregation. LFACS should be included because it is a key source system for Loop Make-up information.
2.	P-11	Provide a list of products that are included in the categories listed in the existing P-11 measure.	See Attachment Item 2 – Existing Service Order Accuracy Products.
3.		Explain whether orders submitted on a fully mechanized basis and flow through for ordering purposes, but fall out in the provisioning process, could be captured in this measure.	This type of order could be captured in the measure. When selecting service orders for the service order accuracy measure, service orders are selected at random from those completed in the reporting period.
4.		Provide a list of products that would be included in the disaggregated categories of Resale, UNE and UNE-P under the new P-11 measure	The categories for the new P-11 measure would include the following product classes: Resale – Business, Centrex, ESSEX, ISDN, PBX, and Residence; UNE – UNE loops, UNE ISDN, and line sharing; and UNE-P – UNE loop and port combinations and Combos – Other.
5.		State when BellSouth would be able to implement a service order accuracy measure that is based on a mechanized review of certain customer impacting service order errors on partially mechanized LSRs rather than on a statistically valid sample.	BellSouth could implement this measure containing the fields similar to those audited by Verizon within ninety (90) days of an order.
6.		Provide proposal on how SEEMs payments would be calculated under the new P-11 measure	See Attachment Item 6.
7.	P-13B	Verify whether the calculation as reflected in this measure is accurate.	The calculation for P-13B is correct, although the business rules should be modified to reflect more precisely the manner in which performance data is being reported and penalty payments are being calculated. See Attachment Item 7 – Measure P-13B.
8.	P-13D	Determine whether exclusion should be modified to include: (1) orders for which 10 digit triggers could apply but were not applied; and (2) orders that were not candidates for 10 digit triggers.	BellSouth agrees that the exclusion language for this measure should be modified to clarify that orders for which 10 digit triggers were not applied will be excluded (as opposed to excluding only those orders which were not candidates for 10 digit triggers).

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JAN 11 2002

**EXECUTIVE SECRETARY
G.P.S.C.**

GPSC Docket No. 7892-U
BellSouth Action Items – SQM Workshop – Dec. 10 – 12

9.		Provide written explanation of agreement concerning interplay between P-13 measures and remedy payments	See Attachment Item 9 – January 11, 2001 Letter from Bennett Ross
10.		Provide electronic version of existing P-13D measure (current) and proposed supplemental P-13D measure (four hour benchmark and additional exclusion)	See Attachment Item 10 for a copy of P-13D(1) (current measure with change in exclusion language) and P-13D(2) (proposed 4 hour benchmark with additional exclusion). An electronic copy of these two measures is included in the Attachment Item 34.
11.	TGP-1	Explain how SEEM payments are calculated for trunking measures.	See Attachment Item 11 – SEEM Payment Calculations for Trunking Measures.
12.		Provide the number of category 1, 9, 10 and 16 trunk groups in BellSouth network.	Category 1- 5717 Category 9- 5235 Category 10- 960 Category 16- 309
13.	0-16 New Measure	Provide proposed language for Ordering Trouble Ticket Responses in X days measure and arrange conference call to discuss with CLECs.	See Attachment Item 13 – Proposed Measure O-16
14.		Explain BellSouth's internal policy concerning timeframes for responding to CLEC inquiries by the following groups: Account Teams, EC Support, LCSC, and CRSG.	<p>The timeframes for responding to CLEC inquiries by the Account Team (as well as other Interconnection Services Sales groups such as the CRSG) are outlined in Carrier Notification Letter SN91082802, dated January 4, 2002. See Attachment Item 14.</p> <p>The internal response policies for the EC Support Group require an acknowledgment to the CLEC within one (1) hour. Because the magnitude of the CLEC problems reported to EC Support can vary significantly, there are no set timeframes for resolving such problems. However, the EC Support Group's internal policies contemplate that the CLEC will be contacted at least daily and as many as four (4) times a day and provided a status report on the EC Support Group's progress.</p> <p>The LCSC has no internal policy concerning timeframes for responding to CLEC inquiries. In most cases the service representatives in LCSC respond to CLEC questions while the CLEC is on the line. If the LCSC service representative cannot answer the question immediately and believes it will take longer than 15 minutes to resolve, the service representative gives the CLEC the option of remaining on the line or negotiating a call back time.</p>

GPSC Docket No. 7892-U
BellSouth Action Items – SQM Workshop – Dec. 10 – 12

15.	CM-6 New Measure	Provide proposed language for Software Correction measure and arrange conference call to discuss with CLECs.	See Attachment Item 15 – Proposed Measure CM-6
16.		Provide data associated with interval to fix a high impact defect, which has no electronic workaround.	BellSouth does not have this information readily available, but continues to investigate whether it can be compiled. If the information is available, BellSouth will supplement this response at a later date.
17.	CM-7 & CM-8 New Measures	Provide proposed for Average Time to Reject/Accept Requests measure and arrange conference call to discuss with CLECs.	See Attachment Item 17 - Proposed Measure CM-7 (Percent Change Requests Accepted or Rejected Within 10 Days); and CM-8 (Percent Change Requests Rejected).
18.	Audit	State BellSouth's willingness to pay 100% of audit of new measures, while costs of audits of existing measures would continue to be split 50/50.	BellSouth is agreeable to this proposal.
19.		Determine when Louisiana audit on "parity by design" measurements (e.g., OS/DA, 911) will be completed.	KPMG does not have a current schedule for the Louisiana Performance Metric Audit. They have projected a zero defect schedule of 76 days to complete the entire audit. If they begin the audit in mid-January and keep it on schedule, KPMG should complete the audit by the end of March 2002.
20.	"Data Integrity"	State whether "Projects" are included in Missed Installation Appointment data.	Projects are included in Percent Missed Installation Appointments measure.
21.		Identify in which measures Directory Listing orders are included and in which sub-metrics.	The following ordering measures include Directory Listings: O-7 (Percent Rejected); O-8 (Reject Interval); O-9 (FOC Timeliness); and O-11 (FOC & Reject Response Completeness). Directory Listing orders appear in the UNE Other Non-Design sub-metric.
22.		Provide revised business rules for each affected measure (e.g., FOCs and Reject intervals) to capture activity even when the beginning and ending timing of such activity overlaps from month to month.	When an LSR is received in one month and rejected or FOC'd in another month, the LSR will be counted and the FOC or reject interval will be calculated in the month in which the response was sent. (Measures O-8 and O-9). For metrics Percent Reject (O-7) and FOC and Reject Response Completeness (O-11), the numerator for each measure consists of the total count of LSRs received and responded to in the reporting month. The denominator consists of the count of only the LSRs received in the reporting month.

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BellSouth Action Items – SQM Workshop – Dec. 10 – 12

23.		State when LNP Completion Notification and Jeopardy Notice Interval measures were corrected or will be corrected.	<p>The correct intervals were provided from PMAP for Average Completion Notice Interval (“ACNI”) in November 2001. ACNI completion notice issues will be corrected with the December data to be run in January for LNP and all other products.</p> <p>The Jeopardy Notice Interval data as corrected in November 2001 for October data.</p>
24.		State when BellSouth will provide LSR detail for LNP Flow-Through Report.	<p>BellSouth is currently unable to determine a means to provide the same level of detail for LNP LSRs that is currently provided for LEO-processed (or the non-LNP) LSRs. There is no single table in the LNP Gateway environment that logs each event for LNP LSRs. In the LEO environment, the Audit Notes table performs this function.</p> <p>However, in an effort to be responsive to the requests of the CLEC, BellSouth can provide a report that lists each unique CC/PON/VER, the Source System, and the classification of each, such as “BST Caused Error”, “CLEC Caused Error”, “AutoClarified”, “Flowed Through”, etc. This report can be made available to any CLEC upon request.</p>
25.		Provide updated Flow-Through calculation instructions.	See Attachment Item 25 - Updated flow-through calculation instructions.
26.		Correct problem that causes UNE-P to appear in UNE Other Non-Designed category on CLEC PMAP reports.	A change request has been entered to remove product identifications associated with UNE -P from the UNE Other Non-Design product and to leave them in UNE-P category.
27.		Work with AT&T to reconcile the lack of completion notices for orders submitted directly in SOCs, AT&T’s orders missing completion notice data., and non-matching raw data files.	BellSouth is reviewing the information provided by AT&T and will respond to AT&T in writing no later than January 18, 2002.
28.	SEEMS	Provide a list of products that are included in the SEEMs categories for each Tier I and Tier II measure.	See Attachment Item 28 – Products Included in SEEMs Categories for Each Tier I and Tier II Measure.

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BellSouth Action Items – SQM Workshop – Dec. 10 – 12

29.		Provide details on SEEMs adjustments, including application of interest charges.	See Attachment Item 29 – SEEMs Adjustments.
30.		Reconcile affected volumes reported in August data for Reject Interval measure (mechanized)	In the August 2001 data, the volume for all products for the Reject Interval measure was originally posted erroneously as 4,449. The corrected volume, and the volume reported in the Monthly State Summary (MSS) report, was 12,942.
31.		Provide for each SEEM measure the units upon which remedy payments are based (e.g., hours, days, orders, etc.).	OSS/Pre-Ordering Minutes Ordering LSRs Provisioning Service Orders Maintenance & Repair Trouble Tickets Billing Dollars (Except for B2, Mean time to Deliver Invoices, which is based on number of invoices.) Trunks Calls Collocation Collocation Arrangements Change Management Documents/Notices
32.		Provide Confidentiality Agreement for parties interested in reviewing SEEMs calculations.	See Attachment Item 32 – Confidentiality Agreement for viewing of SEEMs Calculations.
33.	Special Access	Explain whether intrastate special access tariffs include remedies similar to those contained in BellSouth's interstate tariffs?	The "Service Installation Guarantee" and the "Credit Allowance for Service Interruption" remedies in the intrastate access "E" tariff in Georgia are similar to those found in the interstate FCC #1 tariff.
34.	Other	Provide electronic copies of the following measures to the Commission Staff: B-9 B-10 P-13B P-13C P-13D(1) P-13D(2) P-15 OSS-2 OSS-3	See electronic file accompanying this filing called "Item 34-ElectronicFiles.zip".

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BellSouth Action Items – SQM Workshop – Dec. 10 – 12

Due Dates:

January 11, 2002

January 25, 2002

January 30, 2002

February 15, 2002

BellSouth and CLECs file responses to Action Items

BellSouth and CLECs file agreed upon language for new measures

CLECs file proposed changes to Change Control Process

BellSouth filed response to CLECs' proposed changes to Change Control Process

BellSouth Telecommunications, Inc.
Legal Department
125 Perimeter Center West
Suite 376
Atlanta, GA 30346

Bennett L. Ross
General Counsel - Georgia
770 391 2416
Fax 770 391 2812

February 1, 2002

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

RECEIVED

FEB 01 2002

**EXECUTIVE SECRETARY
G.P.S.C.**

Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

One of the outstanding action items from the industry workshops in the above-referenced proceeding concerned revisions to Measure P-11 (Service Order Accuracy). The parties have agreed that, in comparing what was ordered versus what was completed for determining service order accuracy on a going-forward basis, only significant customer impacting fields should be considered. The parties have reached agreement on many of the specific fields that should be reviewed as part of this measure, and these fields are set forth in Attachment 1. Although not mentioned on our prior industry calls, the CLEC Coalition recently proposed several additional fields, which BellSouth is in the process of reviewing.

During our last industry call, a question was raised about the increased volumes for the sub-metrics under the existing service order accuracy measure between October 2001 and November 2001 results. BellSouth explained at the time that, in order to ensure a statistically valid sample as required by the Commission's Service Quality Measurement ("SQM") plan, BellSouth had begun using regional data and had expanded the selected samples to cover all the disaggregation levels under the current measure. In addition, BellSouth was reporting results based on Local Service Requests ("LSRs") rather than service orders and had failed to include certain product categories, most notably mechanized loop-port combinations, from the universe from which the sample was being drawn. Effective with November 2001 results, BellSouth began reporting results for the measure based on service orders as opposed to LSRs, changed the process to use a statistically valid sample of service orders as opposed to counting all service orders associated with a particular LSR, and added all the product categories to the universe,

Mr. Reece McAlister
February 1, 2002
Page 2

including mechanized loop-port combinations, that had previously been omitted. The changes brought BellSouth's reporting more closely in conformity with the requirements of the SQM.

Enclosed for filing please find an original and eighteen (18) copies, as well as an electronic version, of this letter and Attachment 1, and I would appreciate your returning the three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Yours very truly,



Bennett L. Ross

BLR:nvd
Enclosures

cc: Leon Bowles
Parties of Record

431972

The BellSouth Service Order will be reviewed to ensure that it accurately reflects what was ordered on the LSR. The BellSouth Local Service Request (LSR) fields identified below will be used, as applicable, for this Service Order Accuracy review process.

BellSouth LSR Fields

Company Code

PON

Billed Telephone Number

Telephone Number

Ported Telephone Number

Application Date

Due Date

Circuit ID

PIC

LPIC

Directory Listing

- Directory deliver address

- Listing activity

- Alphanumeric listing identifier code

- Record type

- Listing type

- Listed telephone number

- Listed name, last name

- Listed name, first name

- Address indicator

- Listed address house number

- Listed address house number suffix

- Listed address street directional

- Listed address street name

- Listed address thoroughfare

- Listed address street suffix

- Listed address locality

- Yellow pages heading

Features

- Feature activity

- Feature codes

- Feature detail

Hunting

- Hunt group activity

- Hunt group identifier

- Telephone number identifier

- Hunt type code

- Hunt line activity

- Hunting sequence

- Number type

- Hunting telephone number

E911 Listing

- Service address house number

- Service address house number suffix

- Service address street directional

- Service address street name

- Service address thoroughfare

- Service address street suffix

- Service address descriptive location

Remarks

SMITH, GALLOWAY, LYNDALL & FUCHS, LLP

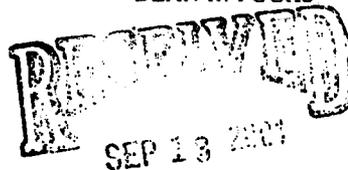
ATTORNEYS AT LAW

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PHILIP J. SMITH
NEWTON M. GALLOWAY
TERRI M. LYNDALL
DEAN R. FUCHS

BY HAND DELIVERY

September 10, 2001



Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, First Floor
Atlanta, Georgia 30334

GENERAL COUNSEL
GEORGIA

Re: Docket No.: 7892-U: Performance Measures for Telecommunications Interconnection, Unbundling and Resale

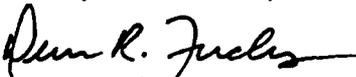
Dear Mr. McAlister:

You will please find included herewith an original and sixteen (16) copies of Birch Telecom of the South, Inc.'s Initial Comments pertinent to the above-referenced matter. Please stamp one duplicate of the filing, and return it to me in the enclosed self-addressed stamped envelope. I have also enclosed a 3.5" diskette containing the filing in Microsoft Word format.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

SMITH, GALLOWAY, LYNDALL & FUCHS, LLP


Dean R. Fuchs

DRF/alf
Enclosures

cc: Birch Telecom of the South, Inc.
All Parties of Record

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In Re Performance Measures for)
Telecommunications,)
Interconnection, Unbundling and) Docket No. 7892-U
Resale.)

COMMENTS OF BIRCH TELECOM OF THE SOUTH, INC.

COMES NOW Birch Telecom of the South, Inc. ("Birch") and in compliance with the August 23, 2001 Order issued in this docket, files the following comments and recommendations.

In anticipation of the Six Month Review to be held in conjunction with the SQM filed by BellSouth in Georgia, Birch has prepared and inserted its comments into the matrix attached hereto. Birch respectfully requests that the Georgia Commission adopt the "matrix-filing" format as a means to capture all BellSouth proposed changes to the SQM, comments supporting those changes, and also any CLEC-proposed changes and comments supporting such changes. Birch asserts that the matrix format will provide a useful document that enables all parties and the Commission to easily identify where BellSouth and the CLECs agree or disagree on specific proposed changes to the SQM.

As this Commission is aware, Birch has been actively involved in the progression of the Performance Measurements developed by SBC and the Texas Public Utility Commission in Texas and also in the subsequent Six Month Reviews held in conjunction with the same. Birch has found the Texas process to be relatively streamlined and finds that the majority of preliminary matters addressed prior to the actual workshop, maximize

the productivity of the actual time spent in the workshop, for all parties and the Commission. The matrix format proposed herein is currently utilized in Texas and is typically the format used by the Commission to issue its findings as a result of the Six Month Reviews held there. Birch would be happy to provide any documents issued in Texas for this Commission to review and analyze.

Further, Birch respectfully suggests that the most efficient use of time for the upcoming workshop would be realized by using the current language from the BellSouth SQM version 1.01, filed with the PSC on April 11, 2001, as a starting point. Working with the SQM document will allow all parties to reference the same starting point and avoid subsequent interpretation problems with any Commission order in this docket. In addition, Birch believes it would also be beneficial for all CLECs and BellSouth to meet offline from the Commission, prior to the workshop, to discuss any agreements or disagreements with respect to the proposals/comments filed herein, in order to maximize the effectiveness of the October workshop.

WHEREFORE, Birch respectfully requests that the Commission adopt the recommendations made by Birch herein and specifically requests that the Commission adopt the matrix format attached hereto, containing Birch's comments on the SQM. In the event that the Commission decides not to adopt the same, Birch respectfully requests that the Commission considers the comments made by Birch on the SQM, as contained in the matrix attached hereto.

Respectfully submitted,

Rose M. Mulvany (by DAF w/permission)

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**ATTORNEYS FOR BIRCH TELECOM
OF THE SOUTH, INC.**

**BIRCH TELECOM OF THE SOUTH
PROPOSED CHANGES TO THE GEORGIA SQM**

PM #	Section Changed	Current Language	Proposed Language	BST Rationale	CLEC Rationale
OSS-1	SQM Disaggregation	Table 1:	Add Column to Table 1 that identifies the number of seconds each query type will time out (return no result or error message) if the specific query type fails.		BIRCH: A system query time out occurs if no response is received from the queried database within a specified time. The number of seconds for which a specific query type will time out has a significant impact on an average response time measurement. If the time out is set at a short interval (or often changed), the results could be skewed in BellSouth's favor.
OSS-2	Definition	Scheduled Availability is defined as the number of hours in the reporting period that the applications/interfaces are scheduled to be available.			BIRCH: Birch requests that the Scheduled Availability times be reviewed. The Scheduled Availability should more closely align with the hours CLECs are more likely to use the specific application. For example, TAG is "available" from 3 AM to 11:30 PM Monday thru Friday or 19.5 hours per day. Currently under this measurement, TAG outages at 3 AM are given the same weight as TAG outages at 10 AM, while the effect to the CLEC is vastly different. A reasonable set of Scheduled Availability hours should be set. This logic is similar to BellSouth logic used for excluding non-business hours from the FOC and Reject Interval measures.
OSS-2	Exclusions	Degraded service, e.g. slow response time, loss of non-critical functionality	Degraded service, e.g. slow response time, loss of non-critical functionality		BIRCH: See OSS-2 Business Rule
OSS-2	Business Rules	This measure captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. Only full outages are included in the calculations for this measure. Full outages are defined as occurrences of either of the following: <ul style="list-style-type: none"> Application/interfacing application is down or totally inoperative. Application is totally inoperative for customers attempting to access or use the application. This includes transport outages when they may be directly associated with a specific application. 	This measure captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. Both partial and full outages will be captured for this measure. <p>Full Outages are defined as:</p> <ul style="list-style-type: none"> Application/interfacing application is down or totally inoperative. Application is totally inoperative for customers attempting to access or use the application. This includes transport outages when they may be directly associated with a specific application. <p>Partial Outages are defined as:</p>		BIRCH: Under the current SQM, OSS partial outages are not captured, but often occur. In a BellSouth presentation of the SQM, it was clear that this measurement would never be missed, as the chance for full outages would require multiple server outages for each interface. This is despite the fact that partial outages do occur and negatively effect CLEC ability to interact with BellSouth electronically. <p>Birch's attempt to capture partial outages in this measurement is not simply to create a measurement for which BellSouth has the possibility of missing, but rather to</p>

		Comparison to an internal benchmark provides a vehicle for determining whether or not CLECs and retail BST entities are given comparable opportunities for use of pre-ordering and ordering systems.	<ul style="list-style-type: none"> An application server is down or totally inoperative (resulting in degraded services for all other servers). <p>When partial outages occur, an availability factor is applied to the calculation of downtime. This factor is stated as a percentage and represents the impact to the CLEC. BellSouth will govern the availability factor and disputes related to the application of the factor may be presented to the Commission. BellSouth will report how many partial outages occurred for each given month.</p>		capture OSS performance... CLEC's experience. Allowing BellSouth to apply an availability factor without CLEC input is a good faith effort to account for partial outages and is similar to language used for OSS Availability for Texas
OSS-2	OSS Interface Availability table	The table list of all applications measured as part of the SQM. The table is too large to be included in this matrix.			BIRCH: Birch requests that BellSouth present in either its reply comments or at the October workshop, the details used to determine Percentage Availability for each application. Specifically, Birch is interested in how BellSouth applies the measurement for applications that utilize multiple servers. For example, if LENS utilizes three servers, how does BellSouth calculate the denominator for percentage availability (only scheduled availability or scheduled availability times three) and what would cause a full outage (one server going down or all three at the same time)?
OSS-3	Exclusion	Degraded service, e.g. slow response time, loss of non-critical functionality	Degraded service, e.g. slow response time, loss of non-critical functionality		BIRCH: See OSS-2 Business Rule
OSS-3	Business Rule	<p>This measure captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. Only full outages are included in the calculations for this measure. Full outages are defined as occurrences of either of the following:</p> <ul style="list-style-type: none"> Application/interfacing application is down or totally inoperative. Application is totally inoperative for customers attempting to access or use the application. This includes transport outages when they may be directly associated with a specific application. <p>Comparison to an internal benchmark provides a vehicle for determining whether or not CLECs and retail BST entities are given comparable opportunities for use of pre-ordering and ordering systems.</p>	<p>New Language:</p> <p>This measure captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. Both partial and full outages will be captured for this measure.</p> <p>Full Outages are defined as:</p> <ul style="list-style-type: none"> Application/interfacing application is down or totally inoperative. Application is totally inoperative for customers attempting to access or use the application. This includes transport outages when they may be directly associated with a specific application. <p>Partial Outages are defined as:</p> <ul style="list-style-type: none"> An application server is down or totally inoperative (resulting in degraded services for all other servers). <p>When partial outages occur, an availability factor is</p>		BIRCH: See OSS-2 Business Rule

			<p>applied to the calculation of downtime. This factor is stated as a percentage and represents the impact to the CLEC. BellSouth will govern the availability factor and disputes related to the application of the factor may be presented to the Commission. BellSouth will report how many partial outages occurred for each given month.</p>	
OSS-4	SQM Disaggregation	Legacy System Access Time for M&R (table)	Add Column to table that identifies the number of seconds each query type will time out (return no result or error message) if the specific query type fails.	<p>BIRCH: A system query time out occurs if no response is received from the queried database within a specified time. The number of seconds for which a specific query type will time out has a significant impact on an average response time measurement. If the time out is set at a short interval (or often changed), the results could be skewed in BellSouth's favor.</p>
O-3	SEEM Disaggregation - Analog/Benchmark	<p>Resale Residence - 95% Resale Business - 90% UNE - 85% LNP - 85%</p>	<p>Resale Residence - 95% Resale Business - 95% UNE - 95% LNP - 95%</p>	<p>BIRCH: Flow-through measures how many CLEC LSRs pass through BellSouth's OSS and FOC is returned without manual handling by BellSouth. The ability of BellSouth's OSS to operate in a mechanical fashion will have a meaningful effect on a CLEC's ability to add new customers and service existing customers. When orders do not pass through BellSouth's OSS mechanically (partially mechanized), the CLEC's LSRs are subjected to longer timeframes and the greater possibility of human error as BellSouth service representatives will re-type the CLEC LSRs so they can be accepted by BellSouth's legacy provisioning systems. Comparatively, BellSouth's Retail operation does not have another organization re-typing service orders (as the LCSC does for CLEC orders). The flow-through standards need to be set at levels that require BellSouth to increase flow-through in order to provide parity access to the ordering function. Additionally, the current Georgia flow-through measure is based on the eligibility of the LSR the CLEC submits to be processed mechanically. If the LSR is not designed by BellSouth to flow through, it is excluded from the measurement. The benchmarks are set at 95% for Resale Residence, 90% for Resale Business, and 85% for UNE and LNP orders that are</p>

				<p>eligible to flow-through. If LSRs are designed to be processed mechanically, the benchmark should be set at 95%.</p> <p>For the 271 applications that have passed the FCC scrutiny, all have flow-through standards set at high levels. Bell Atlantic / Verizon has a 95% standard for all eligible LSRs and Southwestern Bell has a more stringent goal of meeting a parity standard.</p>
O-4	SEEM Disaggregation - Analog/Benchmark	Resale Residence - 95% Resale Business - 90% UNE - 85% LNP - 85%	Resale Residence - 95% Resale Business - 95% UNE - 95% LNP - 95%	BIRCH: See O-3 Birch comments
O-4	Reporting Problem			BIRCH: Birch and BellSouth are currently researching possible reporting issues with the flow-through results from July. More detailed information should be provided in the reply comments.
O-8	Report Structure	<ul style="list-style-type: none"> • Mechanized: <ul style="list-style-type: none"> 0 - ≤ 4 minutes > 4 - ≤ 8 minutes > 8 - ≤ 12 minutes > 12 - ≤ 60 minutes 0 - ≤ 1 hour <ul style="list-style-type: none"> > 1 - ≤ 4 hours > 4 - ≤ 8 hours > 8 - ≤ 12 hours > 12 - ≤ 16 hours > 16 - ≤ 20 hours > 20 - ≤ 24 hours > 24 hours • Partially Mechanized: <ul style="list-style-type: none"> 0 - ≤ 1 hour > 1 - ≤ 4 hours > 4 - ≤ 8 hours > 8 - ≤ 10 hours 0 - ≤ 10 hours > 10 - ≤ 18 hours 0 - ≤ 18 hours > 18 - ≤ 24 hours > 24 hours • Non-mechanized: <ul style="list-style-type: none"> 0 - ≤ 1 hour > 1 - ≤ 4 hours > 4 - ≤ 8 hours 	<ul style="list-style-type: none"> • Mechanized: <ul style="list-style-type: none"> 0 - ≤ 30 minutes > 30 - ≤ 60 minutes > 1 - ≤ 3 hours > 3 - ≤ 8 hours > 8 hours • Partially Mechanized: <ul style="list-style-type: none"> 0 - ≤ 1 hour > 1 - ≤ 5 hours > 5 - ≤ 10 hours > 10 - ≤ 18 hours > 18 hours • Non-mechanized: <ul style="list-style-type: none"> 0 - ≤ 5 hours > 5 - ≤ 10 hours > 10 - ≤ 24 hours > 24 hours • Trunks: <ul style="list-style-type: none"> ≤ 4 days > 4 - ≤ 8 days > 8 - ≤ 12 days > 12 - ≤ 14 days > 14 - ≤ 20 days > 20 days 	BIRCH: The current report structure provides too many different intervals and is often difficult to decipher. Narrowing the reported intervals will assist in the usefulness of the PMAP report.

		<ul style="list-style-type: none"> > 8 - ≤ 12 hours > 12 - ≤ 16 hours > 16 - ≤ 20 hours > 20 - ≤ 24 hours 0 - ≤ 24 hours > 24 hours <ul style="list-style-type: none"> • Trunks: <ul style="list-style-type: none"> ≤ 4 days > 4 - ≤ 8 days > 8 - ≤ 12 days > 12 - ≤ 14 days > 14 - ≤ 20 days > 20 days 			
O-8	SEEM Disaggregation - Analog/Benchmark	<ul style="list-style-type: none"> • Mechanized - 97% within 1 Hour • Partially Mechanized - 85% within 10 Hours • Non-Mechanized: - 85% within 24 hours 	<ul style="list-style-type: none"> • Mechanized - 97% within 1 Hour • Partially Mechanized - 95% within 5 business hours • Non-Mechanized: - 95% within 24 clock hours 		<p>BIRCH: Birch asserts that both the "percentage within" and the "number of hours" should be reevaluated. First, in comparing the Georgia SQM for "percentage within" to the four approved 271 applications, the Georgia measurement does not hold BellSouth to standards that are required of both SWBT and Bell Atlantic / Verizon. Specifically, all four of the Performance Standards for reject interval were at the 95% level, regardless of the hourly standard.</p> <p>In comparing the "number of hours" for which the notifications should be returned, the FCC has approved two entirely different ordering processes for Bell Atlantic and SWBT. Bell Atlantic's process of handling CLEC LSRs involves Bell Atlantic's representatives in correcting CLEC errors, which undoubtedly would require more time. Noting this process (New York order at paragraph 160), the FCC approved a longer reject timeframe for New York (24 clock hours). By contrast, SWBT's order process involves immediately rejecting to the CLEC any order that contains an error, regardless if the error is easily correctable. This process requires substantially less time as the onus is placed on the CLEC to submit accurate LSRs and allows SWBT to focus on processing accurate LSRs.</p> <p>BellSouth's ordering process is more</p>

				<p>closely aligned with the process SWBT utilizes (rejecting LSRs when errors are identified as opposed to trying to correct CLEC mistakes). The current SQM standard of 10 business hours should be augmented to more closely resemble the standards that SWBT was held to for both the Texas and Kansas/Oklahoma 271 approval (5 business hours). For every BellSouth service, except residential resale, 10 business hours reflect 24 clock hours (as LCSC hours are 8 AM to 6 PM).</p> <p>Additionally, Birch's commercial experience over the last few months indicates that BellSouth's results also suggest that BellSouth is entirely capable of returning partially mechanized rejects in the shorter duration approved for SWBT. Region-wide SQM data indicates that for the month of April 2001, BellSouth returned partially mechanized rejects, on average, between 2 and 3 business hours for resale and UNE-P orders.</p>
O-9	Report Structure	<ul style="list-style-type: none"> • Mechanized: <ul style="list-style-type: none"> 0 - ≤ 4 minutes > 4 - ≤ 8 minutes > 8 - ≤ 12 minutes > 12 - ≤ 60 minutes 0 - ≤ 1 hour > 1 - ≤ 4 hours > 4 - ≤ 8 hours > 8 - ≤ 12 hours > 12 - ≤ 16 hours > 16 - ≤ 20 hours > 20 - ≤ 24 hours > 24 hours • Partially Mechanized: <ul style="list-style-type: none"> 0 - ≤ 1 hour > 1 - ≤ 4 hours > 4 - ≤ 8 hours > 8 - ≤ 10 hours 0 - ≤ 10 hours > 10 - ≤ 18 hours 0 - ≤ 18 hours > 18 - ≤ 24 hours 	<ul style="list-style-type: none"> • Mechanized: <ul style="list-style-type: none"> 0 - ≤ 1 hour > 1 - ≤ 3 hours > 3 - ≤ 8 hours > 8 hours • Partially Mechanized: <ul style="list-style-type: none"> 0 - ≤ 1 hour > 1 - ≤ 5 hours > 5 - ≤ 10 hours > 10 - ≤ 18 hours > 18 hours • Non-mechanized: <ul style="list-style-type: none"> 0 - ≤ 5 hours > 5 - ≤ 10 hours > 10 - ≤ 24 hours > 24 hours • Trunks: <ul style="list-style-type: none"> ≤ 4 days > 4 - ≤ 8 days > 8 - ≤ 12 days > 12 - ≤ 14 days > 14 - ≤ 20 days 	<p>BIRCH: The current report structure provides too many different intervals and is often difficult to decipher. Narrowing the reported intervals will assist in the usefulness of the PMAP report.</p>

		<ul style="list-style-type: none"> • 24 hours • Non-mechanized: <ul style="list-style-type: none"> 0 - ≤ 1 hour > 1 - ≤ 4 hours > 4 - ≤ 8 hours > 8 - ≤ 12 hours > 12 - ≤ 16 hours > 16 - ≤ 20 hours > 20 - ≤ 24 hours 0 - ≤ 24 hours > 24 hours • Trunks: <ul style="list-style-type: none"> ≤ 4 days > 4 - ≤ 8 days > 8 - ≤ 12 days > 12 - ≤ 14 days > 14 - ≤ 20 days > 20 days 	20 days		
O-9	SEEM Disaggregation - Analog/Benchmark	<ul style="list-style-type: none"> • Mechanized - 95% within 3 Hours • Partially Mechanized - 85% within 10 Hours • Non-Mechanized: - 85% within 36 hours 	<ul style="list-style-type: none"> • Mechanized - 95% within 3 Hours • Partially Mechanized - 95% within 5 business hours • Non-Mechanized: -95% within 24 clock hours 		<p>BIRCH: The Firm Order Confirmation (FOC) Date is the date an ILEC assigns to complete a CLEC order. This response from BellSouth is very important to the CLECs as it is the date that will be communicated to the end user for the service to be installed. The CLEC's ability to get a FOC response in a timely manner is paramount. Using an example of an end user wanting new telephony service, if the end user calls an ILEC's Retail operation, it is Birch's experience that an install or FOC Date will be communicated to the end user in a short time frame. If the same end user calls a Georgia CLEC, the CLEC is limited by the standards of the FOC Timeliness SQM to communicate an install date. The 95% returned within 5 hours benchmark for electronically submitted orders minimizes the disadvantage CLECs experience when Local Service Requests (LSRs) are handled manually by BellSouth.</p> <p>The 5-hour benchmark also provides a great incentive for BellSouth to increase flow-through. If BellSouth increases the percentage of CLEC LSRs that flow-through, the percentage of CLEC LSRs that must be manually handled (partially</p>

				<p>mechanized) is reduced. The result is a percentage of partially mechanized LSRs will be easier for BellSouth to return within 5 hours. This logic is very similar to the logic the Texas Commission used in developing the Texas 5 hour standard</p> <p>Birch would not be opposed to adding language to the benchmarks that allow for more time to return FOC for complex services.</p>
P-3	Reporting Problem			<p>BIRCH: SQM Report for % Missed Installation Appointments uses BellSouth's internal service orders to determine why a due date was missed. Specifically, every time a due date is changed, BellSouth must enter a Subsequent Due Date indicator that assigns reasons for the changed due date. Birch has found that in instances where No Field Work is required, BellSouth does not accurately enter Subsequent Due Date indicators. In most cases, BellSouth assigns codes that indicate that Birch requested a different due date, when in fact BellSouth was responsible for the missed due date. These mistakes in coding, whether intentional or not, misstate this measurement. Birch has experienced the same mistake with regards to Southwestern Bell orders in Texas</p> <p>Birch and BellSouth are currently reviewing specific examples that are an issue. If Birch and BellSouth disagree on the detail and outcome of the examples, Birch will provide the specific examples in the reply comments. Otherwise the issue may be resolved, for Birch, without Commission intervention.</p>
P-4	Business Rule	The actual completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from when BellSouth issues a FOC or SOCS date time stamp receipt of an order from the CLEC to BellSouth's actual order completion date. This includes all delays for BellSouth's CLEC/End Users. The dock starts when a valid order number is assigned by	The actual completion interval is determined for each order processed during the reporting period. The completion interval is the elapsed time from the timestamp of when BellSouth first receives a valid LSR to BellSouth's actual order completion date. This includes all delays for BellSouth's CLEC/End Users. The dock starts when a valid order number is assigned by SOCS and stops when the technician or system completes the order in SOCS. Elapsed time for each order is accumulated for each reporting	<p>BIRCH: The Average Completion Interval measurement should determine if Georgia end users can receive parity service from BellSouth and CLECs. Under the current Georgia SQM, this can not be determined from the measurement. An issue is the start timestamp for the measurement. Specifically, the current measurement</p>

SOCS and status when the technician or system completes the order in SOCS. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

The interval breakout for UNE and Design is:
0-5 = 0-4.99, 5-10 = 5-9.99, 10-15 = 10-14.99, 15-20 = 15-19.99, 20-25 = 20-24.99, 25-30
= 25-29.99, > 30 = 30 and greater.

dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed.

Orders that are worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

starts once BellSouth has entered the CLEC LSR into SOCS. The use of this start time omits any time taken to process the CLEC orders. The same can be said for BellSouth retail's results, except BellSouth retail experiences very high levels of flow-through (which reduces the time taken to process the request to almost zero).

The Birch proposed change, which is supported by the FCC, includes the time BellSouth takes to process CLEC orders. The Birch proposed change also captures the end user experience with an efficient CLEC ordering process.

In each of the 271 applications approved by the FCC, the average completion interval begins with the timestamp of when the RBOC receives the CLEC LSR - not when the RBOC enters the CLEC order in the legacy ordering systems. Also, the FCC has concluded in various orders denying BellSouth's 271 applications that the average completion interval should begin with the timestamp of when the CLEC order is first received (South Carolina and Louisiana 1 & 2). Specifically in the Louisiana 1 order at paragraph 41 the FCC states:

As we stated in the BellSouth South Carolina Order, the most meaningful average installation interval measure is the average time it take from when BellSouth first receives an order from a completing carrier to when BellSouth provisions the service for that order.

The time BellSouth first receives the CLEC order is the timestamp of the CLEC LSR - not the time in which BellSouth enters the CLEC order into its

P-3	Report Structure	UNE and Design reported in day intervals = 0-5.5-10-10-15-15-20-20-25-25-30 > 30	UNE reported in day intervals = 1,2,3,4,5+ Design reported in day intervals = 0-5.5-10-10-15-15-20-20-25-25-30. > 30		regulatory systems BIRCH: The reported intervals for UNEs should be revised to reflect the reported intervals for resale. For example, a high percentage UNE-P orders should be completed within 5 days. The current SQM will only show the results in the 0-5 day interval, which does not provide much value.
P-4	Reporting Problem				BIRCH: Birch and BellSouth are researching the exclusion of orders from this measurement that were placed within the offered interval. More detailed information should be provided in the reply comments.
P-3 & 4	SEEM Disaggregation	UNE Loop + Port Combinations <i>analog to</i> Retail Residence and Business	UNE Loop + Port Combinations <i>analog to</i> Retail Residence and Business (POTS)		BIRCH: The current retail analog for UNE Loop + Port Combinations includes more categories of services than just residential and business POTS services. CLEC UNE-P POTS orders should be compared to retail POTS orders only, with all other UNE combination services falling into the UNE Loop + Port Combination "Other" category.
P-9	Business Rules	Measures the quality and accuracy of completed orders. The first trouble report from a service order after completion is counted in this measure. Subsequent trouble reports are measured in Repeat Report Rate. Reports are calculated searching in the prior report period for completed service orders and following 30 days after completion of the service order for a trouble report issue date. D & F orders are excluded as there is no subsequent activity following a disconnect.	Specific language changes should be discussed at the workshop.		BIRCH: The Trouble within 30 Days of Order Completion should be expanded to include instances where end users experience No Dial Tone from the result of BellSouth's two order process of converting from BellSouth retail to CLECs UNE-P service and when BellSouth fails to properly provision services that CLEC order (including but not limited to loss of features and incorrect PIC changes) Both of the above instances are not currently captured under the SQM because the BellSouth repair center will direct the CLEC to the LCSC to fix the service order issues causing the No Dial Tone or to the LCSC to issue new service orders to properly provision the original CLEC request. The source of this measurement is trouble tickets taken by BellSouth. The root cause of these problems not being captured is that BellSouth does not open trouble tickets in these instances, as the LCSC does not have access to the trouble ticketing systems.

					Language should be added to this measurement to capture these instances. An example of how these end user troubles could be captured is taken from the Texas Performance Measurements Southwestern Bell, which also uses the LMOS system to capture POTS trouble reports, has created a specific informational trouble ticket code that is included for SQM purposes (generally, informational tickets are excluded). When similar troubles occurs in Texas, the repair center opens informational trouble tickets to account for these specific instances of trouble.
P-9	SEEM Disaggregation	UNE Loop + Port Combinations <i>analog to</i> Retail Residence and Business	UNE Loop + Port Combinations <i>analog to</i> Retail Residence and Business (POTS)		BIRCH: The current retail analog for UNE Loop + Port Combinations includes more categories of services than just residential and business POTS services. CLEC UNE-P POTS orders should be compared to retail POTS orders only, with all other UNE combination services falling into the UNE Loop + Port Combination "Other" category.
P-11	Business Rules	A statistically valid sample of service orders, completed during a monthly reporting period, is compared to the original account profile and the order that the CLEC sent to BellSouth. An order is "completed without error" if all service attributes and account detail changes (as determined by comparing the original order) completely and accurately reflect the activity specified on the original order and any supplemental CLEC order. For both small and large sample sizes, when a Service Request cannot be matched with a corresponding Service Order, it will not be counted. For small sample sizes an effort will be made to replace the service request.	A statistically valid sample of <u>partially mechanized and manual</u> service orders, completed during a monthly reporting period, is compared to the original account profile and the order that the CLEC sent to BellSouth. An order is "completed without error" if all service attributes and account detail changes (as determined by comparing the original order) completely and accurately reflect the activity specified on the original order and any supplemental CLEC order. For both small and large sample sizes, when a Service Request cannot be matched with a corresponding Service Order, it will not be counted. For small sample sizes an effort will be made to replace the service request.		BIRCH: The intent of this measure should be to capture the Service Order Accuracy of orders that are manually handled by BellSouth. The service orders that are mechanically handled should almost never have accuracy problems when compared with the original CLEC order. The inclusion of mechanically handled service orders greatly reduces the value of the measurement.
Appendix C:	BellSouth Audit Policy	BellSouth currently provides many CLECs with certain audit rights as a part of their individual interconnection agreements. However, it is not reasonable for BellSouth to undergo an audit of the SQM for every CLEC with which it has a contract. BellSouth has developed a proposed Audit Plan for use by the parties to an audit. If requested by a Public Service Commission or	BellSouth currently provides many CLECs with certain audit rights as a part of their individual interconnection agreements. However, it is not reasonable for BellSouth to undergo an audit of the SQM for every CLEC with which it has a contract. BellSouth has developed a proposed Audit Plan for use by the parties to an audit. If requested by a Public Service Commission or by a CLEC exercising contractual audit rights, BellSouth will agree to undergo a		BIRCH: The audit policy should be changed to have BellSouth pay for the annual audits. Requiring the CLECs to pay 50% will preclude smaller CLECs, such as Birch, from participating in the audit. Also, the SQM results are BellSouth's self reported results of BellSouth performance. BellSouth is

		<p>by a CLEC exercising contractual audit rights. BellSouth will agree to undergo a comprehensive audit of the aggregate level reports for both BellSouth and the CLEC(s) each of the next five (5) years (2001-2005) to be conducted by an independent third party. The results of that audit will be Made available to all the parties subject to proper safeguards to protect proprietary information. This aggregate level audit includes the following specifications:</p> <ol style="list-style-type: none"> 1. The cost shall be borne 50% by BellSouth and 50% by the CLEC or CLECs. 2. The independent third party auditor shall be selected with input from BellSouth, the PSC, if applicable, and the CLEC(s). 3. BellSouth, the PSC and the CLEC(s) shall jointly determine the scope of the audit. 	<p>comprehensive audit of the aggregate level reports for both BellSouth and the CLEC(s) each of the next five (5) years (2001-2005) to be conducted by an independent third party. The results of that audit will be made available to all the parties subject to proper safeguards to protect proprietary information. This aggregate level audit includes the following specifications:</p> <ol style="list-style-type: none"> 1. The cost shall be borne by BellSouth. 2. The independent third party auditor shall be selected with input from BellSouth, the PSC, if applicable, and the CLEC(s). 3. BellSouth, the PSC and the CLEC(s) shall jointly determine the scope of the audit. 	<p>responsible for the accuracy of the reports and BellSouth should also be responsible for the validation of those reports by an independent third party auditor.</p>
PMAP Website	Speed and Usefulness of PMAP Data	<p>Current database is unreasonable slow to download PMAP reports. The data provide is also only one month of data. Providing historical results would increase the value of the PMAP reports.</p>	<p>PMAP database should be changed to allow users to download many or all reports at one time. The PMAP data should also contain 12 months of historical results that allow end users to see trends in BellSouth performance / results.</p>	<p>BIRCH: The current PMAP layout requires users to download numerous documents that is both time consuming to download and requires hundreds of separate documents to be saved. Birch estimates it would take over 25 hours monthly to download every document off the PMAP website (21 sections with an average of 15 reports per subsection and approximately 5 minutes per report would result in over 25 hours).</p> <p>The website layout could be improved for easier downloading. Combining, for example, all the CLEC specific reports for Ordering into one spreadsheet would alleviate over 25 separate downloads currently required to download the CLEC specific Ordering reports. Repeating this concept for the other reporting areas (CLEC specific and SQM) would reduce the number of downloads required to around 20.</p> <p>As a final recommendation / request, adding historical data (past 6-12 months) to the reports would allow for easy determination of past performance. This allows for easier analysis by the end user and also enables the tracking of</p>

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing INITIAL COMMENTS OF BIRCH TELECOM OF THE SOUTH, INC. upon the following persons by causing copies of the same to be placed in an envelope with adequate postage affixed thereon and deposited in the United States Mail addresses as follows:

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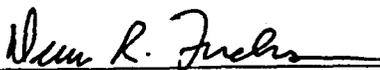
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This ^{10th} day of September, 2001.


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