

incurs in holding employees (or calling out employees) beyond normal business hours in order to provide dedicated project management to a competitive LEC during the term of the cut.¹⁰²² BellSouth points out that, contrary to US LEC's claims, these charges are in fact covered by the interconnection agreement.¹⁰²³ Attachment 6, Section 1.2 of a US LEC interconnection agreement states that "[a]ll other US LEC requests for provisioning and installation services are considered outside of the normal hours of operation and may be performed subject to the application of extra-ordinary billing charges."¹⁰²⁴ US LEC does not refute BellSouth's response. Thus, to the extent US LEC deems such charges unlawful, it may seek relief from the state commissions, which are charged with interpreting interconnection agreements in the first instance.

265. BellSouth also states that, because of the "confusing nature" of the Carrier Notification concerning recovery of after hours LNP charges,¹⁰²⁵ it is currently waiving the project management charges.¹⁰²⁶ BellSouth states that it "has not charged any carrier, and will not charge for any after hours coordination performed this far."¹⁰²⁷ Until BellSouth completes its re-evaluation of these charges, BellSouth states that it will continue to waive its right to recover these charges but will continue to perform after hours coordinated LNP conversions.¹⁰²⁸ If and when BellSouth lifts the waiver and begins imposing the disputed charges, US LEC and any other affected carriers may bring any challenges before the relevant state commissions.

266. For the foregoing reasons, we reject US LEC's claims that BellSouth does not comply with the Commission's number portability requirements. We therefore conclude that BellSouth satisfies checklist item 11.

G. Checklist Item 12 – Local Dialing Parity

267. Section 271(c)(2)(B)(xii) requires "[n]ondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3)."¹⁰²⁹ Based on the evidence in the record,

¹⁰²² *Id.*

¹⁰²³ *Id.*

¹⁰²⁴ *Id.*

¹⁰²⁵ *Id.* (stating that, by Carrier Notification dated January 16, 2002, BellSouth described its intent to begin recovery of these costs on a trial basis).

¹⁰²⁶ *Id.* at para. 43.

¹⁰²⁷ *Id.*

¹⁰²⁸ *Id.*

¹⁰²⁹ 47 U.S.C. § 271(c)(2)(B)(xii).

we find, as did the state commissions,¹⁰³⁰ that BellSouth satisfies the requirements of checklist item 12.

268. We reject WorldCom's claim that BellSouth's misrouting of intraLATA calls as local calls in Florida and Georgia rise to a level of checklist noncompliance in the instant application. WorldCom claims that BellSouth's explanation that the misrouting of calls in Georgia was due to a calling scope issue unique to Georgia (an explanation accepted by the Commission in the Georgia/Louisiana proceeding)¹⁰³¹ is inconsistent with its explanation that the identical problem in Florida is caused by switch translation errors.¹⁰³² BellSouth, however, denies that it violates this checklist item, and reiterates the explanation it gave to this Commission in the Georgia/Louisiana proceeding.¹⁰³³

269. We find WorldCom's assertions unpersuasive. BellSouth's alleged misrouting of intraLATA calls in Florida is not relevant to a determination of whether BellSouth meets checklist item 12 in Alabama, Mississippi, Kentucky, North Carolina, and South Carolina.¹⁰³⁴ For purposes of the instant application, we consider only whether BellSouth meets the requirements of section 271 in the five states.¹⁰³⁵ Moreover, no other commenter has challenged BellSouth's provision of local dialing parity in the five states, and the state commissions concluded that BellSouth meets this checklist item. We also believe that any concerns regarding the Georgia UNE-P calling scope issue are best resolved through the section 252 negotiation and arbitration process or through the section 208 complaint process. Accordingly, we do not find that WorldCom's claim warrants a finding of checklist noncompliance. Although not decisional

¹⁰³⁰ Alabama Commission Comments at 239; Kentucky Commission Comments at 39; Mississippi Commission Comments at 3; North Carolina Comments at 243; South Carolina Comments at 1.

¹⁰³¹ See *BellSouth Georgia/Louisiana Order*, 17 FCC Rcd at 9170-72, para. 269. In the Georgia/Louisiana proceeding, BellSouth demonstrated that this problem was not a systemic switch problem. *Id.* at 9171 & n.1057. BellSouth explained that WorldCom's complaint arose because, in Georgia, there is a slight geographic difference between flat-rate local calling areas and measured-rate local calling areas. *Id.* at 9171, para. 269. Additionally, BellSouth stated that because UNE-P is a measured-rate service, BellSouth measures UNE-P switching based on the slightly larger measured-rate local calling area. *Id.* We accepted BellSouth's calling scope explanation because we found that the dispute had a limited commercial impact and no other competitive LEC raised this issue. *Id.* at 9172, para. 269.

¹⁰³² WorldCom Comments at 5-6; WorldCom Reply at 7.

¹⁰³³ BellSouth Ruscilli/Cox Reply at para. 82.

¹⁰³⁴ See *SWBT Texas Order*, 15 FCC Rcd at 18528, para. 351; *Bell Atlantic New York Order* 15 FCC Rcd at 4151, paras. 398-99 (noting that rule violations in other states are not relevant to a determination of whether Bell Atlantic meets its section 271 obligations in New York).

¹⁰³⁵ WorldCom also contends that BellSouth's OSS is inadequate because, even though BellSouth plans to fix the Georgia calling scope issue with its 10.6 Release on August 24, 2002, BellSouth is requiring WorldCom for the first time to amend its interconnection agreement to take advantage of the change. WorldCom Reply at 1-2; WorldCom September 12 *Ex Parte* Letter. We believe that this issue should be appropriately decided by the state commissions in the first instance.

to our analysis, we note that BellSouth addressed this calling scope issue in its Release 10.6 on August 24-25, 2002.¹⁰³⁶

H. Remaining Checklist Items (3, 6, 7, 9, 13, and 14)

270. In addition to showing that it is in compliance with the requirements discussed above, an applicant under section 271 must demonstrate that it complies with checklist item 3 (access to poles, ducts, and conduits),¹⁰³⁷ item 6 (unbundled local switching),¹⁰³⁸ item 7 (911/E911 access and directory assistance/operator services),¹⁰³⁹ item 9 (numbering administration),¹⁰⁴⁰ item 13 (reciprocal compensation),¹⁰⁴¹ and item 14 (resale).¹⁰⁴² Based on the evidence in the record, we conclude that BellSouth demonstrates that it is in compliance with checklist items 3, 6, 7, 9, 13, and 14 in the five states.¹⁰⁴³ No parties objected to BellSouth's

¹⁰³⁶ Parties contend, and BellSouth acknowledges, that Georgia UNE-P orders were rejected soon after the implementation of Release 10.6. BellSouth September 10 *Ex Parte* Letter at 1-2; see also AT&T September 9 *Ex Parte* Letter at 1; WorldCom September 12 *Ex Parte* Letter at 1-3. BellSouth explains, however, that the rejections were caused by the competitive LECs and any problems associated with the processing of these orders would be corrected. BellSouth also states that AT&T's UNE-P orders for Georgia were rejected because AT&T failed to update its interconnection agreement to include the new UNE-P calling scope USOCs, AT&T did not populate the "LSR line class of service field," and incorrectly added primary interLATA carrier changes in this field which was prohibited by Release 10.6. BellSouth September 10 *Ex Parte* Letter at 1-2.

¹⁰³⁷ 47 U.S.C. § 271(c)(2)(B)(iii).

¹⁰³⁸ 47 U.S.C. § 271(c)(2)(B)(vi).

¹⁰³⁹ 47 U.S.C. § 271(c)(2)(B)(vii).

¹⁰⁴⁰ 47 U.S.C. § 271(c)(2)(B)(ix).

¹⁰⁴¹ 47 U.S.C. § 271(c)(2)(B)(xiii).

¹⁰⁴² 47 U.S.C. § 271(c)(2)(B)(xiv). In each of the five states, BellSouth generally met the parity standards for installation timeliness and missed installation appointments. See Alabama/Kentucky/Mississippi/North Carolina/South Carolina A.2.1.1.1.1-A.2.1.6.2.2 (Order Completion Interval, Resale); Alabama/Kentucky/Mississippi/North Carolina/South Carolina A.2.11.1.1.1-A.2.11.6.2.2 (% Missed Installation Appointments, Resale). Additionally, as compared to BellSouth retail in the five states, competitors generally experienced a lower average of % trouble reports within 30 days after installation of a resale line. See Alabama/Kentucky/Mississippi/North Carolina/South Carolina A.2.12.1.1.1-A.2.12.6.2.2 (% Provisioning Trouble within 30 Days, Resale). Moreover, BellSouth generally missed fewer repair appointments for competitors. See Alabama/Kentucky/Mississippi/North Carolina/South Carolina A.3.1.1.1-A.3.1.6.2 (Missed Repair Appointments, Resale). Finally, BellSouth's repeat trouble rates are generally in parity for most months in the five states. Alabama/Kentucky/Mississippi/North Carolina/South Carolina A.3.4.1.1-A.3.4.6.2 (% Repeat Troubles within 30 Days, Resale). For a discussion of BellSouth's resale performance, see section IV.B.2, *supra*.

¹⁰⁴³ See BellSouth Application at 100-01 (checklist item 3), 118-20 (checklist item 6), 120-22 (checklist item 7), 123-24 (checklist item 9), 132-33 (checklist item 13), 134-36 (checklist item 14).

compliance with these checklist items. We also note that the state commissions concluded that BellSouth complies with the requirements of each of these checklist items.¹⁰⁴⁴

VI. SECTION 272 COMPLIANCE

271. Section 271(d)(3)(B) provides that the Commission shall not approve a BOC's application to provide interLATA services unless the BOC demonstrates that the "requested authorization will be carried out in accordance with the requirements of section 272."¹⁰⁴⁵ Based on the record, we conclude that BellSouth has demonstrated that it will comply with the requirements of section 272.¹⁰⁴⁶ BellSouth provides evidence that it maintains the same structural separation and nondiscrimination safeguards in Alabama, Kentucky, North Carolina, South Carolina, and Mississippi as it does in Georgia and Louisiana, states in which BellSouth has already received section 271 authority.¹⁰⁴⁷

272. We reject AT&T's argument that BellSouth has violated section 272 through its interstate and intrastate switched access (SWA) tariffs.¹⁰⁴⁸ Section 272 prohibits a BOC from discriminating in favor of its section 272 long distance affiliate and requires that a BOC charge itself or its affiliate no less than the amount charged to any unaffiliated IXC for access to its telephone exchange service.¹⁰⁴⁹ A BOC "must make volume and term discounts available on a non-discriminatory basis to all unaffiliated interexchange carriers."¹⁰⁵⁰ Growth discounts violate this mandate because they offer reduced prices based on growth in interexchange traffic, and they therefore create "an artificial advantage for BOC long distance affiliates with no subscribers, relative to existing IXCs and other new entrants."¹⁰⁵¹

¹⁰⁴⁴ Alabama Commission Comments at 174 (checklist item 3), 216 (checklist item 6), 227 (checklist item 7), 229 (checklist item 9), 243 (checklist item 13), 247 (checklist item 14); Kentucky Commission Comments at 31 (checklist item 3), 34 (checklist item 6), 35 (checklist item 7), 36 (checklist item 9), 40 (checklist item 13), 41 (checklist item 14); Mississippi Commission Comments at 3; North Carolina Commission Comments at 167 (checklist item 3), 218 (checklist item 6), 224 (checklist item 7), 229 (checklist item 9), 245 (checklist item 13), 251 (checklist item 14); South Carolina Commission Comments at 1.

¹⁰⁴⁵ 47 U.S.C. § 271(d)(3)(B).

¹⁰⁴⁶ See BellSouth Application App. A, Tab B, Affidavit of Pavan Bhalla (BellSouth Bhalla Aff.) at paras. 6-16; BellSouth Ruscilli/Cox Aff. at paras. 225-322.

¹⁰⁴⁷ *BellSouth Georgia/Louisiana Order*, 17 FCC Rcd at 9177, para. 279; BellSouth Ruscilli/Cox Aff. at paras. 225-322.

¹⁰⁴⁸ AT&T Comments at 45-51.

¹⁰⁴⁹ 47 U.S.C. § 272(c)(1), (e)(3).

¹⁰⁵⁰ *Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended*, CC Docket No. 96-149, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 21905, 22028-92, para. 257 (1996).

¹⁰⁵¹ *Access Charge Reform*, CC Docket No. 96-262, Fifth Report and Order and Further Notice of Proposed Rulemaking, 14 FCC Rcd 14221, 14294, para. 134 (1999).

273. AT&T contends that BellSouth's FCC Tariff No. 1 (FCC SWA Tariff)¹⁰⁵² and intrastate SWA tariffs in Alabama, Kentucky, North Carolina, South Carolina, and Mississippi¹⁰⁵³ contain discriminatory discounts that favor BellSouth's long-distance affiliate, BellSouth Long Distance, by offering reduced prices based on growth in volume.¹⁰⁵⁴

274. BellSouth contends that there is no section 272 violation because BellSouth Long Distance is not eligible to take service under the tariffs at issue.¹⁰⁵⁵ We agree.¹⁰⁵⁶ The FCC SWA Tariff contains language expressly limiting the availability of the tariff only to customers that meet certain minimum usage requirements associated with SWA service.¹⁰⁵⁷ The FCC SWA Tariff also mandates that customers must subscribe within 30 days of the tariff's effective date.¹⁰⁵⁸ The intrastate SWA tariffs at issue contain similar limiting language.¹⁰⁵⁹ BellSouth

¹⁰⁵² BellSouth Telecommunications, Inc. (BSTI), Transmittal No. 637, F.C.C. Tariff No. 1, Section 26, SWA Contract Tariff No. 2002-01 (effective May 18, 2002).

¹⁰⁵³ See Letter from Patrick H. Merrick, Director – Regulatory Affairs, AT&T, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 02-35 [sic] (filed July 22, 2002) (attaching respective SWA tariffs for (1) Kentucky - BSTI Kentucky Access Service Tariff (AST), E26.1 BellSouth SWA Contract Tariff KY2002-01 (effective June 28, 2002); (2) Mississippi - BSTI Mississippi AST, E26.1 BellSouth SWA Contract Tariff MS2002-01 (effective June 14, 2002); (3) South Carolina - BSTI South Carolina AST, E26.1 BellSouth SWA Contract Tariff SC2002-01 (effective June 26, 2002); and (4) Alabama - BSTI Alabama AST, E26.1 BellSouth SWA Contract Tariff AL2002-01 (effective June 17, 2002)). In an August 13, 2002, order, the North Carolina Commission disapproved BellSouth's SWA tariff "as not being in the public interest at this time" and encouraged BellSouth to consider instead "volume-based discounts for access services that are not biased against high-volume IXCs." See Letter from Glenn T. Reynolds, Vice President – Federal Regulatory, BellSouth, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 02-150 (filed Aug. 20, 2002) (BellSouth August 20 *Ex Parte* Letter) (attaching *In the Matter of Tariff Filing by BellSouth Telecommunications, Inc. to Establish Contract Rates for Switched Access Rate Elements*, Order Disapproving Proposed Tariff at 4-5, North Carolina Public Utilities Commission Docket Nos. P-55, Sub 1365, and P-55, Sub 1366 (Aug. 13, 2002)).

¹⁰⁵⁴ AT&T Comments at 45-51.

¹⁰⁵⁵ BellSouth Reply at 56; BellSouth Ruscilli/Cox Reply Aff. at paras. 75-76.

¹⁰⁵⁶ Because we find that BellSouth Long Distance is not eligible for service under those tariffs, we need not reach the question whether those tariffs do in fact offer illegal growth discounts.

¹⁰⁵⁷ FCC SWA Tariff at 26.1.5(B) (reflecting a minimum usage requirement of 3,385,697,632 minutes in year one and increasing in subsequent years). AT&T contends that BellSouth Long Distance somehow can take advantage of the tariff because the tariff is "based on the individual customer's usage during the 18 months prior, and that usage becomes the baseline against which future growth (and size of the discounts) is measured." AT&T August 23 Pricing and Growth Tariff *Ex Parte* Letter at 2. This challenge is contradicted by the plain language of the SWA tariffs, which provides that volume discounts are not applicable to any usage levels outside of the usage ranges, including the minimum usage amounts.

¹⁰⁵⁸ FCC SWA Tariff at Introduction ("In order to take advantage of the volume and term discount plan in BellSouth SWA Contract Tariff No. 2002-01, customers must subscribe to the tariff within 30 days of the tariff's effective date.").

¹⁰⁵⁹ See, e.g., BellSouth Kentucky SWA Contract Tariff at E.26.1.5.B. (reflecting a minimum usage requirement of 103,254,229 minutes in year one and increasing in subsequent years). See also *id.* at E26.1.1.D ("A customer (continued....)

Long Distance did not meet these minimum usage requirements and did not subscribe within 30 days of the tariffs' effective dates.¹⁰⁶⁰ BellSouth Long Distance is therefore ineligible for any of these tariffs. Accordingly, we find that these BellSouth tariff offerings do not result in a section 272 violation.¹⁰⁶¹ We add, however, that if BellSouth Long Distance were eligible to obtain service under these or similar tariffs, we could then address allegations that such tariffs offer illegal growth discounts in violation of section 272.

VII. PUBLIC INTEREST

275. Apart from determining whether a BOC satisfies the competitive checklist and will comply with section 272, Congress directed the Commission to assess whether the requested authorization would be consistent with the public interest, convenience, and necessity.¹⁰⁶² At the same time, section 271(d)(4) of the Act states in full that “[t]he Commission may not, by rule or otherwise, limit or extend the terms used in the competitive checklist set forth in subsection (c)(2)(B).”¹⁰⁶³ Accordingly, although the Commission must make a separate determination that approval of a section 271 application is “consistent with the public interest, convenience, and necessity,” it may neither limit nor extend the terms of the competitive checklist of section 271(c)(2)(B). The Commission views the public interest requirement as an opportunity to review the circumstances presented by the application to ensure that no other relevant factors exist that would frustrate the congressional intent that markets be open, as required by the competitive checklist, and that entry will serve the public interest as Congress expected.

(Continued from previous page)

that is similarly situated may subscribe within a period of thirty (30) days following the effective date of the BellSouth SWA Contract Tariff No. KY2002-01.”)

¹⁰⁶⁰ See Letters from Sean Lev, Counsel to BellSouth, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 02-150 (filed Aug. 12 and 13, 2002) (BellSouth August 12/13 Lev *Ex Parte* Letter). We note that BellSouth originally emphasized that it was ineligible for the tariffs based on language limiting eligibility to customers that have been a BellSouth SWA customer for the previous 18 months. BellSouth Reply at 56; BellSouth Ruscilli/Cox Reply Aff. at para. 76. See also FCC SWA Tariff at 26.1.2(B) (“To subscribe to BellSouth SWA Contract Tariff No. 2002-01, the customer must have been a BellSouth SWA customer for the previous 18-months.”). The intrastate SWA tariffs at issue contain similar limiting language. See, e.g., BellSouth Kentucky SWA Contract Tariff at E.26.1.2.B. (“To subscribe to BellSouth SWA Contract Tariff No. KY2002-01, the customer must have been a BellSouth SWA customer for the previous 18-months.”). BellSouth now states, however, that BellSouth Long Distance has in fact been a BellSouth SWA for the previous 18 months. See BellSouth August 12/13 Lev *Ex Parte* Letter.

¹⁰⁶¹ Although our review in this instance is limited solely to section 271 compliance, AT&T’s allegations, if true, may be addressed through other avenues. For example, AT&T may pursue an action pursuant to sections 201, 202, or 208 of the Act, see 47 U.S.C. §§ 201, 202, 208, or through appropriate state proceedings. AT&T also argues that “there is no impediment” to BellSouth “entering into the same arrangement” with BellSouth Long Distance sometime in the future. AT&T August 23 Pricing and Growth Tariff *Ex Parte* Letter at 3. We reject AT&T’s contention that we should find a violation based on a hypothetical future contract with BellSouth Long Distance.

¹⁰⁶² 47 U.S.C. § 271(d)(3)(C); Appendix D at paras. 70-71.

¹⁰⁶³ *Id.* § 271(d)(4).

276. We conclude that approval of this application is consistent with the public interest. From our extensive review of the competitive checklist, which embodies the critical elements of market entry under the Act, we find that barriers to competitive entry in the local exchange markets have been removed and the local exchange markets in each state today are open to competition. We further find that the record confirms our view, as noted in prior section 271 orders, that BOC entry into the long distance market will benefit consumers and competition if the relevant local exchange market is open to competition consistent with the competitive checklist.¹⁰⁶⁴

277. We disagree with commenters that low levels of facilities-based residential competition in these five states indicate that it would be inconsistent with the public interest to grant this application.¹⁰⁶⁵ The Commission consistently has declined to adopt a market share or other, similar test for BOC entry into long distance.¹⁰⁶⁶ Given an affirmative showing that the competitive checklist has been satisfied, low customer volumes in any one particular mode of entry or in general do not necessarily undermine that showing. Indeed, the Department of Justice concluded that opportunities for facilities-based carriers to serve business customers are available in these states and that, despite lower levels of residential competition, as the systems and processes serving these five states are largely the same as those approved in the *BellSouth Georgia/Louisiana Order*, BellSouth supports opportunities for competitive LECs to serve residential customers via facilities and to serve both business and residential customers via other modes of entry.¹⁰⁶⁷ As the Commission has said in previous section 271 orders, factors beyond the control of the BOC, such as individual competitive LEC entry strategies, might explain a low residential customer base.¹⁰⁶⁸

A. Dangers of Premature Entry

278. We reject US LEC's claim that BellSouth's entry into the long distance market is premature and will cause the competitive LEC industry to shrink because BellSouth will be able to offer bundled long distance and local service.¹⁰⁶⁹ As discussed above, the record confirms that BOC entry into the long distance market will benefit consumers and competition if the relevant local exchange market is open to competition consistent with the competitive checklist.¹⁰⁷⁰ We believe that the bundling of both local and long distance services is one of the goals of section

¹⁰⁶⁴ See *SWBT Texas Order*, 15 FCC Rcd at 18558-89, para. 419.

¹⁰⁶⁵ See, e.g., AT&T Comments at 54-56; US LEC Comments at 29-30; SouthEast Telephone Comments at 1-3.

¹⁰⁶⁶ See, e.g., *Ameritech Michigan Order*, 12 FCC Rcd at 20748, para. 391; see also *Sprint v. FCC*, 274 F.3d at 553-54 ("The statute imposes no volume requirements for satisfaction of [section 271(c)(1)(A)].").

¹⁰⁶⁷ Department of Justice Evaluation at 7; see also BellSouth Reply at 68.

¹⁰⁶⁸ See, e.g., *Verizon Pennsylvania Order*, 16 FCC Rcd at 17487, para. 126.

¹⁰⁶⁹ US LEC Comments at 30-31.

¹⁰⁷⁰ See, e.g., *SWBT Texas Order* 15 FCC Rcd at 18558-59, para. 419.

271, and if the checklist is otherwise met, it would be very difficult for us to deny an otherwise unobjectionable application on the basis that the BOCs will market these services. For the same reason, we disagree with AT&T's assertion that the public interest test cannot be satisfied simply by presuming that the benefits of long-distance entry will outweigh competitive harms from premature authorization, and that if competitive LECs cannot profitably offer residential service to customers, they cannot and will not effectively compete in local markets, regardless of whether the incumbent LEC has long-distance authorization.¹⁰⁷¹ Entry into the long distance market is not premature as long as local markets have been opened to competition pursuant to section 271.

B. Price Squeeze Analysis

279. *Background.* WorldCom contends that BellSouth's excessive UNE rates contribute to a price squeeze that severely limits residential competition in all five states.¹⁰⁷² AT&T contends that BellSouth's UNE rates preclude UNE platform-based entry in North Carolina.¹⁰⁷³ Before analyzing these contentions, we begin with a discussion of a pending remand on the issue of how allegations of a price squeeze should be considered under the public interest standard of section 271(d)(3)(C). In the Commission's *SWBT Kansas/Oklahoma Order*, the subject of *Sprint v. FCC*,¹⁰⁷⁴ the Commission declined to consider allegations that approving a section 271 application would not be in the public interest because competitors are unable to make a profit in the residential market using the UNE-platform.¹⁰⁷⁵ The Commission concluded that the Act requires us to consider whether rates are cost-based, not whether market entry is profitable.¹⁰⁷⁶ The Commission also stated that, if it were to focus on profitability, it would have to consider a state's retail rates,¹⁰⁷⁷ which are generally outside its jurisdictional authority. Appellants asserted that their inability to make a profit in the residential market showed that granting the BOC's section 271 application was not in the public interest.¹⁰⁷⁸ The court concluded that the Commission's rejection of the appellants' profitability argument was not responsive to the appellants' public interest argument.¹⁰⁷⁹ The court did not, however, vacate the

¹⁰⁷¹ AT&T Comments at 52. We also address AT&T's claims concerning the purported difficulty of market entry in the "price squeeze" section below.

¹⁰⁷² WorldCom Comments at 19.

¹⁰⁷³ AT&T Comments at 59.

¹⁰⁷⁴ *Sprint v. FCC*, 274 F.3d 549

¹⁰⁷⁵ *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6269, para. 65, 6280-81, para. 92.

¹⁰⁷⁶ *Id.* at 6280-81, para. 92.

¹⁰⁷⁷ *Id.*

¹⁰⁷⁸ *Sprint v. FCC*, 274 F.3d at 553.

¹⁰⁷⁹ *Id.* at 554.

order. Instead, it remanded the Commission's rejection of the price squeeze issue for reconsideration.¹⁰⁸⁰

280. The Commission intends to issue an order addressing the questions posed in *Sprint v. FCC* about how we should consider allegations of a price squeeze that are raised in section 271 proceedings. Because we have not yet addressed the issues remanded by the court, however, we consider the specific allegations presented by the parties in this case. WorldCom asserts that a price squeeze analysis is relevant in each of the five states¹⁰⁸¹ and that “[i]t is contrary to the public interest . . . to permit BellSouth into the long distance market as long as a price squeeze exists for a majority of consumers.”¹⁰⁸² AT&T argues that the analysis is relevant, at least for the state of North Carolina. It argues that, even if BellSouth's rates are TELRIC-compliant, if the rates fall at the high end of the TELRIC range and “foreclose UNE purchasers from economically providing residential competition,” then they violate section 271's public interest requirement as well as checklist item 2.¹⁰⁸³ We conclude that neither WorldCom nor AT&T has established the existence of a price squeeze because they have not shown that “the UNE pricing [at issue] doom[s] competitors to failure.”¹⁰⁸⁴

281. We note at the outset that the factual information necessary to conduct a price squeeze analysis is highly complex. Courts have recognized the particular difficulty of conducting a price squeeze inquiry in a regulated industry.¹⁰⁸⁵ Such difficulty is exemplified by the competing analyses proffered by AT&T, WorldCom, and BellSouth in this case. The key elements -- input costs, revenues, and internal costs -- depend on numerous variables, only some of which are reflected in the analyses. BellSouth, AT&T, and WorldCom assume different input costs and different revenues in each pricing zone within each state. We note that WorldCom's analysis reflects only one mode of entry, UNE-platform, while AT&T indicates that its calculation optimizes other possible entry strategies such as resale.¹⁰⁸⁶

282. A comparison of BellSouth's, AT&T's, and WorldCom's assumptions demonstrates a wide range of estimates as to the potential costs incurred by and revenue opportunities available to a new entrant. BellSouth's gross margin estimates are significantly higher than those of WorldCom and AT&T. For example, BellSouth's statewide gross margin estimates range from approximately \$9-\$13 higher than WorldCom's estimates in the five states,

¹⁰⁸⁰ *Id.* at 556.

¹⁰⁸¹ WorldCom Comments at 19-20.

¹⁰⁸² WorldCom Reply at 11.

¹⁰⁸³ AT&T Comments at 42. In addition to violating the public interest requirement, AT&T contends that BellSouth's UNE rates in North Carolina are discriminatory in violation of checklist item 2. See discussion below.

¹⁰⁸⁴ *Sprint v. FCC*, 274 F.3d at 554 (emphasis in original).

¹⁰⁸⁵ *Concord Massachusetts v. Boston Edison Co.*, 915 F.2d 17 (1st Cir. 1990).

¹⁰⁸⁶ See AT&T Comments at 41.

and BellSouth's statewide gross margin estimate for North Carolina is higher than AT&T's estimate.¹⁰⁸⁷ Most of the differences in these analyses stem from the fact that BellSouth projects revenues based on a premium features package used by the high-end customers that competitive carriers now typically serve, whereas WorldCom and AT&T project the revenues of a competing carrier based on features used by BellSouth's average customer.¹⁰⁸⁸ Parties also make different assumptions about minutes of use, the amortization of non-recurring charges, access charges, DUF rates, resale revenues, interLATA and intraLATA tolls, and subscriber line charges.¹⁰⁸⁹ None of the carriers considers revenue from services other than traditional voice services, even though the UNE-platform provides competitive carriers the ability to offer additional services not offered by the incumbent. The parties also do not consider the revenues from federal universal service funds¹⁰⁹⁰ or revenues from business lines.¹⁰⁹¹

¹⁰⁸⁷ Compare BellSouth Ruscilli/Cox Aff. at para. 115, Table 1; para. 144, Table 2; para. 167, Table 3; para. 187, Table 4; and para. 213, Table 5 with WorldCom Comments at Exh. 1 and AT&T Reply Comments App. Tab B, Reply Declaration of Michael Lieberman (AT&T Lieberman Reply Decl.) at Proprietary Exh. A.

¹⁰⁸⁸ Compare BellSouth Ruscilli/Cox Aff. at para. 115, Table 1; para. 144, Table 2; para. 167, Table 3; para. 187, Table 4; and para. 213, Table 5 with WorldCom Comments at Exh. 1 and AT&T Lieberman Reply Decl. at Proprietary Exh. A. See also BellSouth Ruscilli/Cox Aff. at para. 91; AT&T Lieberman Decl. at para. 23 and AT&T Lieberman Reply Decl. at para. 6; and WorldCom Reply at 11.

¹⁰⁸⁹ Compare BellSouth Ruscilli/Cox Aff. at para. 115, Table 1; para. 144, Table 2; para. 167, Table 3; para. 187, Table 4; and para. 213, Table 5 with WorldCom Comments at Exh. 1 and AT&T Lieberman Reply Decl. at Proprietary Exh. A.

¹⁰⁹⁰ In the third quarter of 2002, federal universal service funds will be available for all of the states at issue except North Carolina. See Universal Service Administrative Company, "Federal Universal Service Support Mechanisms Fund Size Projections for the Third Quarter 2002" (May 2, 2002), filed pursuant to 47 Section 54.709(a)(3). In the fourth quarter of 2002, federal universal funds will be available in all five states. See Universal Service Administrative Company, "Federal Universal Service Support Mechanisms Fund Size Projections for the Fourth Quarter 2002" (Aug. 2, 2002), filed pursuant to 47 Section 54.709(a)(3). In Alabama, interstate access (CALLS) support of \$0.68 per month will be available for each residential and single line business line in zone two; \$4.91 will be available for each residential and single line business in zone three; and \$3.84 will be available for multi-line business lines in zone three. *Id.* at Appendix HC10. In addition, approximately \$2,217,000 will be available from the Incremental Forward-Looking High Cost mechanism (High Cost Fund), ranging from no support in some wire centers to \$34 per line per month in other wire centers and as high as \$168.87 per line per month in one wire center. The average will be approximately \$1.10 per line per month for every line in the study area. *Id.* at Appendix HC11. In Kentucky, CALLS support of \$2.05 per month will be available for each residential and single line business line in zone three and \$1.11 will be available for multi-line business lines in zone three. *Id.* at Appendix HC10. In addition, approximately \$178,000 per month will be available from the High Cost Fund, ranging from no support in some wire centers to as high as \$2.08 in others. The average will be \$0.14 per line per month for every line in the study area. *Id.* at Appendix HC11. In Mississippi, CALLS support of \$0.52 per month will be available for each residential and single business line in zone three; \$4.78 will be available for each residential and single line business in zone four; and \$4.13 is available for each multi-line business line in zone four. *Id.* at Appendix HC10. In addition, approximately \$8,442,000 per month will be available from the High Cost Fund, ranging from no support in some wire centers to as high as \$77 in others. The average will be \$6.22 per line for every line in the study area. *Id.* at Appendix HC11. In North Carolina, CALLS support of \$0.58 per month will be available for each residential and single line business in zone two; \$2.85 will be available for each residential and single line business in zone three; and \$1.82 will be available for multi-line business lines in zone three. *Id.* at (continued....)

283. *Alabama, Kentucky, Mississippi, South Carolina.* WorldCom asserts that the statewide gross margin is not sufficient in Alabama, Kentucky, Mississippi, and South Carolina for a competitive carrier to cover the cost of leasing the elements and its internal costs.¹⁰⁹² WorldCom asserts that the statewide gross margins -- \$4.03 in Alabama, \$3.28 in Kentucky, negative \$0.79 in Mississippi, and \$0.02 in South Carolina¹⁰⁹³ -- are not enough to cover its internal costs, which exceed \$10 per month.¹⁰⁹⁴ Even using WorldCom's analysis, WorldCom is unable to demonstrate the existence of a price squeeze that would justify a denial of a section 271 application.

284. We note, as we did in the *Verizon Vermont Order* and the *BellSouth Georgia/Louisiana Order*, that it is appropriate to look beyond the low statewide gross margins and consider the margins that are available in individual zones.¹⁰⁹⁵ In the *BellSouth Georgia/Louisiana Order*, for example, we found that, although the statewide margin for Louisiana was only \$2.63, the margin available in 67 percent of the state was \$8.12.¹⁰⁹⁶ Similarly, using WorldCom's analysis, we find that the margins in zone one (and, where appropriate, zone two) in Alabama, Kentucky, Mississippi, and South Carolina are significantly higher than the statewide gross margins in these states. According to WorldCom's analysis, in Alabama, the gross margin in zone one (60 percent of the state) is \$9.09; in Kentucky, the gross margin in zone one (43 percent of the state) is \$11.57 and the gross margin in zone two (22 percent of the state) is \$6.84; in Mississippi, the gross margin in zone one (26 percent of the state) is \$10.60 and the gross margin in zone two (also 26 percent of the state) is \$5.97;¹⁰⁹⁷ and in South Carolina, the gross margin in zone one (69 percent of the state) is \$2.76. We find the gross margins in Alabama, Kentucky, and Mississippi are comparable to the gross margins in

(Continued from previous page) _____
Appendix HC10. In North Carolina, no high costs funds will be available. *Id.* at Appendix HC11. In South Carolina, CALLS support of \$0.82 per month will be available for each residential and single line business line in zone two; \$1.89 will be available for each residential and single line business line in zone three; and \$0.63 will be available for multi-line business lines in zone three. *Id.* at Appendix HC10. In South Carolina, no high cost funds will be available. *Id.* at Appendix HC11.

¹⁰⁹¹ See *SWBT Missouri/Arkansas Order*, 16 FCC Rcd at 20651, para. 66.

¹⁰⁹² WorldCom Comments at 19. WorldCom makes the same arguments with respect to North Carolina, which we discuss below.

¹⁰⁹³ WorldCom Comments at 19 & Exh. 1.

¹⁰⁹⁴ *Id.* at 19-20. WorldCom states that its internal costs include "customer service costs, costs associated with customers who don't pay their bills, billing and collections, overhead, marketing costs, and other operational costs." *Id.*

¹⁰⁹⁵ As we discuss further below, we find it significant that the statewide gross margins "reflect inclusion of negative margins from rural areas" and are low as a result of an "intentional state policy to keep retail rates affordable." *BellSouth Georgia/Louisiana Order*, 17 FCC Rcd at 9179-80, para. 286.

¹⁰⁹⁶ *Id.*

¹⁰⁹⁷ We also note that, as discussed above, the inclusion of federal universal service support revenues in Mississippi might result in a gross margin in zone three and zone four high enough to induce competitors to enter.

Louisiana, where we did not find a price squeeze. While we do not find that South Carolina's gross margins are comparable to Louisiana's, we do find it significant that WorldCom is currently competing in each of these states, including South Carolina.¹⁰⁹⁸ Furthermore, we note that the residential competition rates in each of these four states – ranging from 4.0 to 5.5 percent¹⁰⁹⁹ -- are higher than those of seven states at the time their section 271 applications were filed.¹¹⁰⁰

285. In light of these comparisons and WorldCom's competitive entry in each of these states, we find it significant that WorldCom did not address any of the factors that we identified in past orders as relevant to a price squeeze analysis. WorldCom did not analyze how using a mix of UNEs and resale to provide service would affect a price squeeze analysis. Nor did it provide an analysis to demonstrate the internal costs of an efficient competitor. It did not analyze other revenues that may be available to competitors, such as toll revenues and revenues available from federal universal service funds¹¹⁰¹ and business lines.¹¹⁰² Accordingly, as we found in previous orders,¹¹⁰³ the evidence submitted here is an inadequate basis to determine that a price squeeze exists in the residential markets in Alabama, Kentucky, Mississippi, and South Carolina.

286. *North Carolina.* AT&T asserts that it has conducted a margin analysis that shows that competitive entry in the residential market is not feasible in North Carolina because the statewide gross margin is insufficient, even when considering revenues from intraLATA and interLATA toll calls and the effect of a resale entry strategy.¹¹⁰⁴ WorldCom, which does not consider these factors, asserts the statewide gross margin in North Carolina is \$1.83.¹¹⁰⁵ For all the reasons that we found that WorldCom did not prove a price squeeze in Alabama, Kentucky, Mississippi, and South Carolina, we find WorldCom does not prove a price squeeze in North

¹⁰⁹⁸ WorldCom Comments at 19.

¹⁰⁹⁹ According to the Department of Justice's evaluation, residential competition in Alabama is 4.0%; in Kentucky, 4.0%; in Mississippi, 5.5%; and in South Carolina, 4.6%. Department of Justice Evaluation at 6.

¹¹⁰⁰ See Letter from Glenn T. Reynolds, Vice President – Federal Regulatory, BellSouth, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 02-150 (filed July 31, 2002) (BellSouth July 31 *Ex Parte* Letter) (providing citations showing residential competition in states at the time section 271 applications were filed: Connecticut was 0.1%; Vermont, 0.28%; Maine, 0.55%; New Jersey, 1.32%; New York, 2.99%; Missouri, 3.56%; and Louisiana, 3.92%). We granted each of these section 271 applications.

¹¹⁰¹ *SWBT Missouri/Arkansas Order*, 16 FCC Rcd at 20751, para. 66.

¹¹⁰² *Id.*

¹¹⁰³ *Verizon New Jersey Order*, 17 FCC Rcd at 12362, para. 175; *BellSouth Georgia/Louisiana Order*, 17 FCC Rcd at 9181, para. 290; *Verizon Vermont Order*, 17 FCC Rcd at 7665, para. 73; *SWBT Missouri/Arkansas Order*, 16 FCC Rcd at 20751, para. 66.

¹¹⁰⁴ AT&T Lieberman Reply Decl. at Proprietary Exh. A.

¹¹⁰⁵ WorldCom Comments at 19 & Exh. 1

Carolina, and we will not consider its analysis further. Even using AT&T's analysis, moreover, AT&T is unable to demonstrate the existence of a price squeeze that would justify a denial of a section 271 application.

287. Under AT&T's analysis the gross margin in zone one (72 percent of the state) is not substantially higher than the statewide gross margin.¹¹⁰⁶ We find it significant that WorldCom is currently competing in North Carolina.¹¹⁰⁷ Furthermore, we note that the residential competition rate in North Carolina is 3.6 percent, higher than that of six states at the time that their 271 applications were filed.¹¹⁰⁸

288. Although AT&T, unlike WorldCom, purports to consider some of the factors that we identified in our *Verizon Vermont Order* and other orders as relevant to a price squeeze analysis (such as the effect of including a resale entry strategy; the internal costs of an efficient competitor; and other revenues that may be available to competitors, such as toll revenues and federal universal service funds revenues), we still find AT&T's analysis lacking. First, we find that AT&T provides us with insufficient information to make a judgment about its internal costs or the relationship between its internal costs and those of an "efficient competitor." AT&T purports to provide a breakdown of the internal costs that an efficient new entrant would have to recover when entering local markets in North Carolina.¹¹⁰⁹ AT&T provides confidential line items for local customer care, uncollectible expenses, billing and collections, marketing and sales costs, and other general and administrative costs.¹¹¹⁰ AT&T does not provide "cost or other data," as set forth in our *Verizon Vermont Order*, to verify these figures. Nor does it adequately explain why these figures represent those of an "efficient competitor." We also note that, while AT&T claims to analyze the universal service funds available to a competitor in North Carolina, it did not include these funds in its analysis.¹¹¹¹ Nor did it consider potential revenues from business lines.

289. In addition, AT&T does not convincingly analyze the modes of entry that are available to competitors in North Carolina. AT&T does provide estimates of the revenue that a competitor could gain from resale in North Carolina,¹¹¹² but it did not provide an analysis of

¹¹⁰⁶ AT&T Lieberman Reply Decl. at Proprietary Exh. A.

¹¹⁰⁷ WorldCom Comments at 19.

¹¹⁰⁸ See BellSouth July 24 *Ex Parte* Letter at Attach. 1 (providing citations showing that residential competition is higher in North Carolina than it was in Connecticut, Vermont, Maine, New Jersey, Missouri, and New York when section 271 applications were filed for those states). We granted each of these section 271 applications.

¹¹⁰⁹ AT&T Comments App., Exh. B, Declaration of Stephen Bickley (AT&T Bickley Decl.) at paras. 4-11.

¹¹¹⁰ *Id.*

¹¹¹¹ An ETC can receive CALLS support of \$0.58 per month for each residential and single line business line in zone two and \$2.85 in zone three and \$1.82 for multi-line business lines in zone three.

¹¹¹² AT&T Lieberman Reply Decl. at para. 9, Table III. Revenues are \$3.93 statewide; \$3.98 in zone one; \$3.82 in zone two; and \$3.74 in zone three.

different entry strategies. AT&T claims, for example, that UNE platform-based local entry is “never the more optimal competitive entry solution” in North Carolina.¹¹¹³ But, as BellSouth points out, WorldCom states in its comments that it is already offering UNE platform-based service in North Carolina.¹¹¹⁴ The Department of Justice finds in its analysis that 0.5 percent of residential lines (8431 lines) are served by UNE-platform in North Carolina.¹¹¹⁵ With respect to facilities-based entry, AT&T claims that a UNE-loop strategy, in which a competitive carrier leases BellSouth’s loops but provides its own switching, is “wholly uneconomic”¹¹¹⁶ because BellSouth’s manual “hot cut” process is “plagued by ordering problems” and has “unacceptable levels of service outages.”¹¹¹⁷ We find elsewhere in this order that BellSouth provides hot cuts in North Carolina “within reasonable time intervals, at an acceptable level of quality, with minimal service disruption, and with a minimum number of troubles following installation.”¹¹¹⁸ The Department of Justice finds in its analysis that 1.1 percent of residential lines (18,548 lines) are provided through facilities-based competition.¹¹¹⁹

290. Finally, AT&T is incorrect when it states that “[i]t is . . . not relevant that ‘intentional state policy’ may have caused wholesale rates to exceed retail rates.”¹¹²⁰ In weighing any price squeeze allegation, we must consider whether the price squeeze is the result of a state commission policy to keep rates affordable in high-cost areas. As we stated in the *Verizon Vermont Order*, it is possible that a lack of profitability in entering the residential market may be the result of subsidized local residential rates in one or more zones, and not the fact that UNE rates are at an inappropriate point in the TELRIC range.¹¹²¹ We note that state commissions have jurisdiction over retail as well as wholesale prices.¹¹²² It may be that, until states rebalance residential and business rates, or make high cost subsidies explicit and portable, the UNE-platform may not provide a viable means of entry for certain areas in some states. That fact, however, needs to be weighed against competing public policy interests, such as ensuring

¹¹¹³ AT&T Lieberman Decl. at para. 29.

¹¹¹⁴ BellSouth Reply at 58 (citing WorldCom Comments at 19).

¹¹¹⁵ Department of Justice Evaluation at 6.

¹¹¹⁶ AT&T Comments at 65.

¹¹¹⁷ AT&T Reply at 32 (quoting KMC Telecom/Nuvox Comments at 13-14 and 15-16).

¹¹¹⁸ See section V.B, *supra*.

¹¹¹⁹ Department of Justice Evaluation at 6.

¹¹²⁰ AT&T Comments at 62.

¹¹²¹ *Verizon Vermont Order*, 17 FCC Rcd at 7663-64, paras. 68-69. The Court of Appeals for the District of Columbia Circuit noted this argument as a potential basis for declining to find a price squeeze. The Court did not address this argument because the Commission did not rely on it in the underlying *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd 6237 (2001). *Sprint v. FCC*, 274 F.3d at 555.

¹¹²² For this reason, we think these issues are best presented to the state commission in the first instance.

availability and affordability of local telephone services in rural areas and the benefit to consumers from the BOC's entry into the interLATA market. Given the complex and competing public policy interests at stake, we do not think that we can conclude that the existence of subsidies in rural areas in itself is a circumstance that requires a finding that the public interest requirement has not been satisfied.

291. *Checklist Item Two.* AT&T separately contends that the evidence that it provides of a price squeeze also establishes that BellSouth's North Carolina UNE rates are discriminatory in violation of checklist item two.¹¹²³ As discussed above, we conclude that AT&T has not established the existence of a price squeeze in the residential market. AT&T submits no separate price squeeze analysis in support of this claim. Accordingly, consistent with prior section 271 orders, we need not decide whether the existence of a price squeeze in the residential market would constitute a separate violation of checklist item two.¹¹²⁴

292. For the reasons stated above, we reject AT&T's and WorldCom's allegations of a price squeeze and conclude that there is no evidence in the record that warrants disapproval of this application based on such contentions, whether couched as discrimination in violation of checklist item two, or under the public interest standard.

C. Assurance of Future Compliance

293. We find that the existing SEEM Plans currently in place for these states provide assurance that these local markets will remain open after BellSouth receives section 271 authorization.¹¹²⁵ According to BellSouth, these plans use the same statistical methodology, use the same transaction-based remedy-calculation method, provide for remedy payments both to individual competitive LECs and to the relevant state regulatory bodies, set a meaningful and substantial cap on BellSouth's financial liability, and provide for annual audits, performance reviews, and a dispute resolution procedure.¹¹²⁶ The Alabama and Kentucky SEEM plans are precisely the same as the Georgia SEEM plan already reviewed and approved by this Commission.¹¹²⁷ The SEEM plans in each of the other states are substantially identical, although each includes certain minor state-specific modifications.¹¹²⁸ We therefore approve of these plans and accord them the same probative value as we did the Georgia plan. Because these plans are modeled after the Georgia SEEM plan that we approved in the *BellSouth Georgia/Louisiana*

¹¹²³ AT&T Comments at 41-43.

¹¹²⁴ *Verizon New Jersey Order*, 17 FCC Rcd at 12361-62, para.174; *BellSouth Georgia/Louisiana* 17 FCC Rcd at 9181, para. 289; *Verizon Vermont Order*, 17 FCC Rcd at 7665, para. 72.

¹¹²⁵ *Ameritech Michigan Order*, 12 FCC Rcd at 20748-50, paras. 393-98.

¹¹²⁶ BellSouth Reply at 65. *See also* BellSouth Varner Aff. at paras. 212-13.

¹¹²⁷ *See* BellSouth Application at 141; *see also* BellSouth Varner Aff. at paras. 214-15.

¹¹²⁸ BellSouth Varner Aff. at paras.2 16-19.

Order,¹¹²⁹ we need not discuss them in detail here but refer to our finding in that *Order*.¹¹³⁰ We find that each of the five plans provides sufficient incentives to foster post-entry compliance.

294. AT&T argues that, as performance remedy plans rely on performance data to trigger performance-remedies payments, the unreliability of BellSouth's performance data fatally compromises the efficacy of all of the performance remedy plans that are the subject of this application.¹¹³¹ AT&T further asserts that the performance plans that BellSouth refers to in its applications are either interim plans (Alabama) or have not been finalized (North Carolina) and thus the Commission cannot assess whether these plans meet its criteria for an effective plan.¹¹³² We reject AT&T's arguments. With respect to its first argument, we note that we have found BellSouth's performance data to be reliable.¹¹³³ In addition, as we stated above, the performance plans that BellSouth has already implemented or plans to implement in these states are essentially the same as the plan implemented in the Georgia, which we have already analyzed and approved. With respect to AT&T's second argument, we find that the fact that the plans in Alabama and North Carolina are interim plans has no bearing whatsoever on their validity. They are subject in any case to final approval by the appropriate state commissions and, as we stated in the *BellSouth Georgia/Louisiana Order*, the performance plans adopted by each state commission do not represent the only means of ensuring that BellSouth continues to provide nondiscriminatory service to competing carriers.¹¹³⁴ In addition to the financial penalties imposed by these plans, BellSouth faces other consequences if it fails to sustain a high level of service to competing carriers, including federal enforcement action pursuant to section 271(d)(6),¹¹³⁵ liquidated damages under dozens of interconnection agreements, and remedies associated with antitrust and other legal actions.¹¹³⁶

295. In addition, *WorldCom* argues that, because the South Carolina Commission has designated BellSouth's performance plan as voluntary, liquidated damages under the plan may be unenforceable by the South Carolina Commission under state law and are only recoverable through civil litigation.¹¹³⁷ The South Carolina Commission states that *WorldCom*'s contention that it lacks jurisdiction is incorrect and nothing reduces the South Carolina Commission's

¹¹²⁹ *BellSouth Georgia/Louisiana Order*, 17 FCC Rcd at 9181-83, paras. 291-93.

¹¹³⁰ *Id.*

¹¹³¹ AT&T Comments at 66.

¹¹³² *Id.* at 66-69.

¹¹³³ We discuss the reliability of BellSouth's performance data in section III, above.

¹¹³⁴ *BellSouth Georgia/Louisiana Order*, 17 FCC Rcd at 9186, para. 300.

¹¹³⁵ 47 U.S.C. § 271(d)(6).

¹¹³⁶ See *SWBT Texas Order*, 15 FCC Rcd at 18561-62, para. 424.

¹¹³⁷ *WorldCom* Comments at 20-21.

jurisdiction to enforce the plan.¹¹³⁸ We note that, even if WorldCom's contention was valid, a point we do not address here, the South Carolina Commission has ordered BellSouth to incorporate the performance plan in its SGAT, and allowed each competitive LEC to amend its interconnection plan with BellSouth to incorporate the performance plan.¹¹³⁹ Therefore, in the event that the South Carolina Commission failed to enforce these agreements, a competitive LEC may be able to seek relief pursuant to section 252(e).¹¹⁴⁰ This is in addition to other remedies that are available to the competitive LECs, as stated above.

D. Marketing Tactics

296. We also reject commenters' allegations that BellSouth's application is not in the public interest because of marketing tactics employed by BellSouth.¹¹⁴¹ Some commenters allege that BellSouth has engaged in inappropriate winback¹¹⁴² or retention marketing.¹¹⁴³ In the *CPNI Order*,¹¹⁴⁴ we concluded that winback campaigns are consistent with section 222(c)(1) of the Telecommunications Act and are thus not anticompetitive, and that retention marketing campaigns may be permissible assuming they do not violate the provisions of section 222(b) of the Act, which prohibits a carrier from using carrier proprietary information (CPI) to retain soon-to-be former customers when the carrier gains notice of a customer's imminent cancellation of service through the provision of carrier-to-carrier service.¹¹⁴⁵ We find, as we did in the *BellSouth Georgia/Louisiana Order*, that in the absence of a formal complaint to the Commission that BellSouth has failed to comply with the provisions of section 222(b), these allegations should be

¹¹³⁸ South Carolina Commission Reply at 2.

¹¹³⁹ *Id.*

¹¹⁴⁰ 47 U.S.C. § 252(e).

¹¹⁴¹ See Birch Comments at 4, 10, 13 and 25-26 (discussing "winbacks" and "Customer Rewards").

¹¹⁴² See, e.g., US LEC Comments at 36-37; Birch Comments at 10. Winback marketing refers to situations where a customer has switched to and is receiving service from another provider, whereas retention marketing refers to a carrier's attempts to keep an existing customer before that customer has switched to another carrier.

¹¹⁴³ *Id.*

¹¹⁴⁴ *Implementation of the Telecommunications Act of 1996, Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*; CC Docket No. 96-115; *Implementation Of The Non-Accounting Safeguards Of Sections 271 And 272 Of The Communications Act Of 1934, As Amended*, CC Docket No. 96-149, Order On Reconsideration and Petitions for Forbearance, 14 FCC Rcd 14409, 14445, para. 67 (1999) (*CPNI Order*). See also *Implementation of the Telecommunications Act of 1996; Telecommunications Carriers' Use of Customer Proprietary Network Information; Implementation of the Non-Accounting Safeguards of Section 271 and 272 of the Communications Act of 1934, As Amended, 2000 Biennial Review – Review of Policies and Rules Concerning Unauthorized Changes of Consumer's Long Distance Carriers*, CC Docket Nos. 96-115, 96-149, 00-257, Third Report and Order and Third Further Notice of Proposed Rulemaking, FCC 02-214 (rel. July 25, 2002) (*CPNI Third Report and Order*).

¹¹⁴⁵ *CPNI Order*, 14 FCC Rcd at 14449, para. 77; see also *CPNI Third Report and Order* at para. 131.

referred to the appropriate state commission for disposition.¹¹⁴⁶ The North Carolina Commission ordered BellSouth to abstain from any marketing activities directed to a customer for seven days after the customer switches to another local telephone company.¹¹⁴⁷ The South Carolina Commission issued a Winback Order prohibiting BellSouth from engaging in any winback activities for ten calendar days from the date that service has been provided to a customer by a competitive LEC.¹¹⁴⁸ For consistency throughout its region, BellSouth has adopted as its standard policy that it will not engage in any winback activities for ten calendar days from the date that service has been provided to a customer by a competitive LEC.¹¹⁴⁹

E. Other Issues

297. US LEC states that in the *BellSouth Georgia/Louisiana Order*, the Commission changed its policy and virtually tied approval to checklist compliance.¹¹⁵⁰ Specifically, the order states that “although the Commission must make a separate determination that approval of a section 271 application is ‘consistent with the public interest, convenience, and necessity,’ it may neither limit nor extend the terms of the competitive checklist of section 271(c)(2)(B).”¹¹⁵¹ This standard, however, is part of the statute and, moreover, has been followed by the Commission in all of its section 271 orders. Thus, there is no basis for US LEC’s argument that the public interest standard has been weakened.¹¹⁵²

298. WorldCom claims that on June 14, 2002, BellSouth announced a policy that it will only provide long distance service for BellSouth local customers and not competitive LEC local customers,¹¹⁵³ and that it is contrary to the public interest to allow BellSouth to obtain long

¹¹⁴⁶ See *BellSouth Georgia/Louisiana Order*, 17 FCC Rcd at 9187-88, para. 303.

¹¹⁴⁷ North Carolina Utilities Commission, Docket No. P-55, Sub 1022 (May 23, 2002) at 1, para. 1.

¹¹⁴⁸ South Carolina Public Service Commission, Docket No. 2000-378-C-Order No. 2001-1036 (Oct. 29, 2001) at 13, para. 9. See also South Carolina Public Service Commission, Docket No. 2000-378-C-Order No. 2002-2 (Jan. 9, 2002) at unnumbered 2, para. 2, (clarifying the earlier order by stating that: “the prohibition on the sharing of information among BellSouth divisions found in Order No. 2001-1036 should begin at the time that BellSouth comes into possession of information from the CLEC which would suggest that a specific customer is considering a proposal from the CLEC.”)

¹¹⁴⁹ BellSouth August 15 Non-pricing *Ex Parte* Letter.

¹¹⁵⁰ US LEC Comments at 25.

¹¹⁵¹ *Id.*

¹¹⁵² Although we find that US LEC’s allegations are vague and unsupported, we disagree that BellSouth’s ability to raise prices for special access is *prima facie* evidence of a lack of local competition. *Id.* at 29-30. We do not consider a BOC’s simple pricing of special access, by itself, to be dispositive of the presence or absence of local competition. In any event, the analysis in a section 271 application focuses on checklist compliance, and we conclude herein that BellSouth’s application satisfies all checklist requirements. We therefore reject US LEC’s contentions.

¹¹⁵³ WorldCom Comments at 6.

distance authorization while this policy exists.¹¹⁵⁴ BellSouth states that, while competitive LEC's end users may request long distance from BSLD, the competitive LEC must have an operational agreement with BSLD in order for the request to be fulfilled, and that most competitive LECs cannot or do not make available to long distance carriers the broad range of services needed by BSLD that would enable BSLD to provide service.¹¹⁵⁵ BellSouth indicates that while it is working to provide service to competitive LECs, it must continue to restrict service until the appropriate integrative services are made available.¹¹⁵⁶ While we recognize the inconvenience this may have caused competitive LECs, absent further evidence on the record, we do not find that BellSouth's current policy violates the public interest standard of section 271.¹¹⁵⁷

299. Finally, we note that BellSouth disclosed an incident of premature mail solicitations offering long distance service in the five states plus Florida and Tennessee.¹¹⁵⁸ According to BellSouth, approximately 130,000 of its customers in these states inadvertently received such a solicitation from BellSouth that was meant to be sent only to customers in Georgia and Louisiana.¹¹⁵⁹ BellSouth noted that the mailings contained a notice in fine print, that the advertised service was available only in Georgia and Louisiana.¹¹⁶⁰ In response to BellSouth's disclosure, AT&T filed a motion requesting the Commission to deny this application on the grounds that BellSouth has not met the public interest standard of section 271(d)(3)(c) and issue a "standstill order" directing BellSouth to immediately cease and desist from advertising long distance service in states where it does not have long distance authority.¹¹⁶¹ AT&T further

¹¹⁵⁴ *Id.* at 7.

¹¹⁵⁵ BellSouth Application Reply App., Vol. 2, Tab D, Reply Affidavit of Mary M. Dennis (BellSouth Dennis Reply Aff.) at 1-3.

¹¹⁵⁶ *Id.* at 4.

¹¹⁵⁷ If evidence becomes available to the Commission in the future sufficient to show BellSouth's actions are in violation of the Act or a Commission Rule, we will pursue appropriate enforcement action.

¹¹⁵⁸ See Letter from Kathleen B. Levitz, Vice President – Federal Regulatory, BellSouth, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 02-150 (filed Aug. 8, 2002) (BellSouth August 8 *Ex Parte* Letter). See also BellSouth Corporation's Response to Motion of AT&T Corp. for Emergency Relief, WC Docket No. 02-150, at 1-2 (filed Aug. 23, 2002).

¹¹⁵⁹ *Id.* According to BellSouth, 113,000 packages were sent to Florida, 3,300 were sent to customers in Tennessee, 3,500 packages were sent to Alabama, 800 to Kentucky, 600 to Mississippi, 6,200 were sent to North Carolina, and 1,700 were sent to South Carolina. See Letter from Jonathan B. Banks, General Attorney, BellSouth, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 02-150 at 3 (filed Aug. 14, 2002) (BellSouth August 14 Banks *Ex Parte* Letter).

¹¹⁶⁰ BellSouth August 8 *Ex Parte* Letter at 1. See also Letter from Jonathan B. Banks, General Attorney, BellSouth, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 02-150 at 1 (filed Aug. 23, 2002) (BellSouth August 23 Banks *Ex Parte* Letter).

¹¹⁶¹ Motion of AT&T Corp. for Emergency Relief, WC Docket No. 02-150, at 6-7 (filed Aug. 14, 2002) (AT&T Emergency Motion). AT&T alleged that BellSouth's marketing conduct violated sections 271(a) and 272(g)(2) of the Act, 47 U.S.C. §§ 271(a), 272(g)(2).

requested the Commission to direct BellSouth to submit a sworn statement by August 26, 2002 detailing the scope of the mailings, the number of customer inquiries received as a result, how these inquiries were handled by customer service representatives, what remedial steps have been taken to correct this incident, and what steps have been taken to prevent future violations, along with any related documentation.¹¹⁶²

300. Upon learning of the mailings, BellSouth notified the Commission and began taking corrective action, including mailing letters to affected customers to inform them that the direct mailings and bill inserts had been sent erroneously and that BellSouth was not yet authorized to provide long distance service.¹¹⁶³ BellSouth also began developing additional internal safeguards to prevent incidents of this nature from occurring in the future.¹¹⁶⁴ BellSouth contends that, even if a customer were to call to request long distance service in these five states, its customer service representatives have been trained to respond that BellSouth is not authorized to provide such service.¹¹⁶⁵ Additionally, BellSouth claims - and AT&T has not disputed - that, if a customer service representative were to submit an order to provide BellSouth long distance service in the five states prior to Commission approval of this application, any long distance calls placed by the customer would be blocked and would not go through because the long distance affiliate's switching equipment has not been modified to allow such calls to be completed.¹¹⁶⁶

301. We recognize that potential violations of federal telecommunications law could be relevant to the section 271 inquiry.¹¹⁶⁷ In view of the facts presented here, however, because the allegations do not relate to the openness of the local telecommunications markets to competition, we reject AT&T's argument that we should deny or delay this application under the public interest standard.¹¹⁶⁸ As a result, we take no position on the validity of AT&T's sections

¹¹⁶² *Id.* at 7.

¹¹⁶³ BellSouth August 14 Banks *Ex Parte* Letter at 4.

¹¹⁶⁴ *Id.* See also BellSouth August 23 Banks *Ex Parte* Letter at 1-2. BellSouth says that it has retrained personnel in its advertising group, instituted an additional check on all promotional mailings concerning BellSouth long distance services, designated a corporate officer to be specifically responsible for the proper execution of all promotional mailings for long distance, and will include a statement in all future mailings setting out the states where BellSouth has been approved (or not approved) by the Commission to provide long distance service. *Id.*

¹¹⁶⁵ *Id.* at 1.

¹¹⁶⁶ *Id.*

¹¹⁶⁷ See *Ameritech Michigan Order*, 12 FCC Rcd at 20749-50, para. 397 ("Because the success of the market opening provisions of the 1996 Act depend, to a large extent, on the cooperation of incumbent LECs, including the BOCs, with new entrants and good faith compliance by such LECs with their statutory obligations, evidence that a BOC has engaged in a pattern of discriminatory conduct or disobeying federal and state telecommunications regulations would tend to undermine our confidence that the BOC's local market is, or will remain, open to competition once the BOC has received interLATA authority.").

¹¹⁶⁸ See, e.g., *Bell Atlantic New York Order*, 15 FCC Rcd at 4126-27, para. 340; *Verizon Massachusetts Order*, 16 FCC Rcd at 9107, para. 211; *Verizon New Jersey Order* at para. 190.

271(a) and 272(g) claims here.¹¹⁶⁹ Regardless of what enforcement action we may take in the future, BOCs should not market long distance service in an in-region state prior to receiving section 271 approval from the Commission for that particular state, and should implement controls to prevent such marketing from taking place. We remind BellSouth and all BOCs to exercise caution in this regard.

VIII. SECTION 271(d)(6) ENFORCEMENT AUTHORITY

302. Section 271(d)(6) of the Act requires BellSouth to continue to satisfy the “conditions required for . . . approval” of its section 271 application after the Commission approves its application.¹¹⁷⁰ Thus, the Commission has a responsibility not only to ensure that BellSouth is in compliance with section 271 today, but also that it remains in compliance in the future. As the Commission has already described the post-approval enforcement framework and its section 271(d)(6) enforcement powers in detail in prior orders, it is unnecessary to do so again here.¹¹⁷¹

303. Working with each of the state commissions, we intend to closely monitor BellSouth’s post-approval compliance to ensure that BellSouth does not “cease[] to meet any of the conditions required for [section 271] approval.”¹¹⁷² We stand ready to exercise our various statutory enforcement powers quickly and decisively in appropriate circumstances to ensure that the local market remains open in each of the states.

304. Consistent with prior section 271 orders, we require BellSouth to report to the Commission all Alabama, Kentucky, Mississippi, North Carolina, and South Carolina Monthly State Summary (MSS) reports and the MSS Charts, beginning with the first full month after the effective date of this Order, and for each month thereafter for one year, unless extended by the Commission. These results and reports will allow us to review BellSouth’s performance on an ongoing basis to ensure continued compliance with the statutory requirements. We are confident that cooperative state and federal oversight and enforcement can address any backsliding that may arise with respect to BellSouth’s entry into Alabama, Kentucky, Mississippi, North Carolina, and South Carolina.

¹¹⁶⁹ See AT&T Emergency Motion at 1, 4-5.

¹¹⁷⁰ 47 U.S.C. § 271(d)(6).

¹¹⁷¹ See, e.g., *SWBT Kansas/Oklahoma Order*, 16 FCC Rcd at 6382-84, paras. 283-85; *SWBT Texas Order*, 15 FCC Rcd at 18567-68, paras. 434-36; *Bell Atlantic New York Order*, 15 FCC Rcd at 4174, paras. 446-53; see also Appendix H.

¹¹⁷² 47 U.S.C. § 271(d)(6)(A).

IX. CONCLUSION

305. For the reasons discussed above, we grant BellSouth's application for authorization under section 271 of the Act to provide in-region, interLATA services in the states of Alabama, Kentucky, Mississippi, North Carolina, and South Carolina.

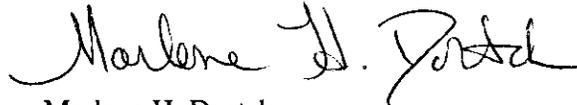
X. ORDERING CLAUSES

306. Accordingly, IT IS ORDERED that, pursuant to sections 4(i), 4(j), and 271 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j) and 271, BellSouth's application to provide in-region, interLATA service in the states of Alabama, Kentucky, Mississippi, North Carolina, and South Carolina, filed on June 20, 2002, IS GRANTED.

307. IT IS FURTHER ORDERED that AT&T's motion for emergency relief, filed on August 14, 2002, IS DENIED.

308. IT IS FURTHER ORDERED that this Order SHALL BECOME EFFECTIVE September 27, 2002.

FEDERAL COMMUNICATIONS COMMISSION



Marlene H. Dortch
Secretary

Appendix A
Commenters in WC Docket No. 02-150

Comments	Abbreviation
Alabama Public Service Commission	Alabama Commission
Alliance for Public Technology	APT
AT&T Corp.	AT&T
Birch Telecom of the South, Inc.	Birch
Communications Workers of America	CWA
Covad Communications Company	Covad
Ernest Communications, Inc.	Ernest
ITC^Deltacom	
Kentucky Public Service Commission	Kentucky Commission
KMC Telecom and NuVox, Inc.	KMC/NuVox
North Carolina Utilities Commission	North Carolina Commission
Mississippi Public Service Commission	Mississippi Commission
Public Service Commission of South Carolina	South Carolina Commission
Southeast Telephone	
Supra Technologies	Supra
US LEC Corp.	US LEC
WorldCom Inc.	WorldCom

Reply Commenters

Replies	Abbreviation
Alabama Public Service Commission	Alabama Commission
AT&T Corp.	AT&T
BellSouth Corp.	BellSouth
Birch Telecom of the South, Inc.	Birch
Mississippi Public Service Commission	Mississippi Commission
NewSouth Communications, Corp.	NewSouth
South Carolina Public Service Commission	South Carolina Commission
US LEC Corp.	US LEC
WorldCom, Inc.	WorldCom

Appendix B

Alabama Performance Metrics

Except where noted, the data included here is taken from the Alabama Monthly State Summary (MSS) Reports provided by BellSouth, calculated according to the Georgia Service Quality Measurement (SQM) business rules. This table is provided as a reference tool for the convenience of the reader. No conclusions are to be drawn from the raw data contained in this table. Our analysis is based on the totality of the circumstances, such that we may use non-metric evidence, and may rely more heavily on some metrics more than others, in making our determination. The inclusion of these particular metrics in this table does not necessarily mean that we relied on all of these metrics, or that other metrics may not also be important in our analysis. Some metrics that we have relied on in the past and may rely on for a future application were not included here because there was no data provided for them (usually either because there was no activity, or because the metrics are still under development).

Metrics with no retail analog provided are usually compared with a benchmark. Note that for some metrics during the period provided there may be changes in the metric definition, or changes in the retail analog applied, making it difficult to compare data

Note: All data was calculated using BellSouth's data platform PMAP 4.0. The March data in this appendix were not taken from the MSS reports, which for that month were calculated using PMAP 2.6, but instead were calculated using PMAP 4.0 by BellSouth. This data also conforms to the Georgia Service Quality Measurement business rules that govern the regular MSS reports.

PERFORMANCE METRIC CATEGORIES

Metric No.	SQM No.	Metric Name
RESALE		
<i>Ordering</i>		
A.1.1	O-7	% Rejected Service Requests – Mech.
A.1.2	O-7	% Rejected Service Requests - Partially Mech.
A.1.3	O-7	% Rejected Service Requests - Non-Mech.
A.1.4	O-8	Reject Interval – Mech.
A.1.7	O-8	Reject Interval - Partially Mech. – 10 hours
A.1.8	O-8	Reject Interval - Non-Mech.
A.1.9	O-9	FOC Timeliness – Mech.
A.1.12	O-9	FOC Timeliness - Partially Mech. - 10 hours
A.1.13	O-9	FOC Timeliness - Non-Mech.
A.1.14	O-11	FOC & Reject Response Completeness - Mech.
A.1.15	O-11	FOC & Reject Response Completeness - Partially Mech.
A.1.16	O-11	FOC & Reject Response Completeness - Non-Mech.
<i>Provisioning</i>		
A.2.1	P-4	Order Completion Interval
A.2.4	P-2	% Jeopardies - Mech.
A.2.5	P-2	% Jeopardies - Non-Mech.
A.2.7	P-2	Average Jeopardy Notice Interval - Mech.
A.2.8	P-2	Average Jeopardy Notice Interval - Non-Mech.
A.2.9	P-2	% Jeopardy Notice \geq 48 hours - Mech.
A.2.10	P-2	% Jeopardy Notice \geq 48 hours - Non-Mech.
A.2.11	P-3	% Missed Installation Appointments
A.2.12	P-9	% Provisioning Troubles within 30 Days
A.2.14	P-5	Average Completion Notice Interval - Mech.
A.2.15	P-5	Average Completion Notice Interval - Non-Mech.
A.2.25	P-11	Service Order Accuracy
<i>Maintenance and Repair</i>		
A.3.1	M&R-1	Missed Repair Appointments
A.3.2	M&R-2	Customer Trouble Report Rate
A.3.3	M&R-3	Maintenance Average Duration
A.3.4	M&R-4	% Repeat Troubles within 30 Days

Metric No.	SQM No.	Metric Name
A.3.5	M&R-5	Out of Service > 24 hours
<i>Billing</i>		
A.4.1	B-1	Invoice Accuracy
A.4.2	B-2	Mean Time to Deliver Invoices – CRIS
UNBUNDLED NETWORK ELEMENTS		
<i>Ordering</i>		
B.1.1	O-7/O-13	% Rejected Service Requests – Mech.
B.1.2	O-7/O-13	% Rejected Service Requests - Partially Mech.
B.1.3	O-7/O-13	% Rejected Service Requests - Non-Mech.
B.1.4	O-8/O-14	Reject Interval – Mech.
B.1.7	O-8/O-14	Reject Interval - Partially Mech. - 10 hours
B.1.8	O-8/O-14	Reject Interval - Non-Mech.
B.1.9	O-9/O-15	FOC Timeliness – Mech.
B.1.12	O-9/O-15	FOC Timeliness - Partially Mech. - 10 hours
B.1.13	O-9/O-15	FOC Timeliness - Non-Mech.
B.1.14	O-11	FOC & Reject Response Completeness – Mech.
B.1.15	O-11	FOC & Reject Response Completeness – Partially Mech.
B.1.16	O-11	FOC & Reject Response Completeness – Non-Mech.
<i>Provisioning</i>		
B.2.1	P-4	Order Completion Interval
B.2.2	P-4	Order Completion Interval within X days - xDSL
B.2.5	P-2	% Jeopardies – Mech.
B.2.6	P-2	% Jeopardies - Non-Mech.
B.2.8	P-2	Average Jeopardy Notice Interval - Mech.
B.2.9	P-2	Average Jeopardy Notice Interval - Non-Mech.
B.2.10	P-2	% Jeopardy Notice \geq 48 hours - Mech.
B.2.11	P-2	% Jeopardy Notice \geq 48 hours - Non-Mech.
B.2.12	P-7	Coordinated Customers Conversions
B.2.13	P-7A	% Hot Cuts > 15 minutes Early
B.2.14	P-7A	Hot Cut Timeliness
B.2.15	P-7A	% Hot Cuts > 15 minutes Late
B.2.16	P-7B	Average Recovery Time – CCC

Metric No.	SQM No.	Metric Name
B.2.17	P-7C	% Provisioning Troubles within 7 Days - Hot Cuts
B.2.18	P-3/P-12	% Missed Installation Appointments
B.2.19	P-9	% Provisioning Troubles within 30 Days
B.2.21	P-5	Average Completion Notice Interval - Mech.
B.2.22	P-5	Average Completion Notice Interval - Non-Mech.
B.2.34	P-11	Service Order Accuracy
Maintenance and Repair		
B.3.1	M&R-1	Missed Repair Appointments
B.3.2	M&R-2	Customer Trouble Report Rate
B.3.3	M&R-3	Maintenance Average Duration
B.3.4	M&R-4	% Repeat Troubles within 30 Days
B.3.5	M&R-5	Out of Service > 24 hours
Billing		
B.4.1	B-1	Invoice Accuracy
B.4.2	B-2	Mean Time to Deliver Invoices - CRIS
LOCAL INTERCONNECTION TRUNKS		
Ordering		
C.1.1	O-7	% Rejected Service Requests
C.1.2	O-8	Reject Interval
C.1.3	O-9	FOC Timeliness
C.1.4	O-11	FOC & Reject Response Completeness
Provisioning		
C.2.1	P-4	Order Completion Interval
C.2.2	P-1	Held Orders
C.2.3	P-2	% Jeopardies
C.2.5	P-3	% Missed Installation Appointments
C.2.6	P-9	% Provisioning Troubles within 30 Days
C.2.7	P-5	Average Completion Notice Interval
C.2.8	P-10	Total Service Order Cycle Time
C.2.10	P-6	% Completions w/o Notice or < 24 hours
C.2.11	P-11	Service Order Accuracy
Maintenance and Repair		
C.3.1	M&R-1	Missed Repair Appointments
C.3.2	M&R-2	Customer Trouble Report Rate

Metric No.	SQM No.	Metric Name
C.3.3	M&R-3	Maintenance Average Duration
C.3.4	M&R-4	% Repeat Troubles within 30 Days
C.3.5	M&R-5	Out of Service > 24 hours
Billing		
C.4.1	B-1	Invoice Accuracy
C.4.2	B-2	Mean Time to Deliver Invoices - CABS
Trunk Blocking		
C.5.1	TGP-1	Trunk Group Performance - Aggregate
OPERATIONS SUPPORT SYSTEMS		
Pre-Ordering		
D.1.1	OSS-2	% Interface Availability - CLEC
D.1.2	OSS-2	% Interface Availability - BST & CLEC
D.1.3	OSS-1	Average Response Interval - CLEC (LENS)
D.1.4	OSS-1	Average Response Interval - CLEC (TAG)
Maintenance and Repair		
D.2.1	OSS-3	% Interface Availability - BST
D.2.2	OSS-3	% Interface Availability - CLEC
D.2.3	OSS-3	% Interface Availability - BST & CLEC
D.2.4	OSS-4	Average Response Interval <= 4 Seconds
D.2.5	OSS-4	Average Response Interval <= 10 Seconds
D.2.6	OSS-4	Average Response Interval > 10 Seconds
COLLOCATION		
Collocation		
E.1.1	C-1	Average Response Time
E.1.2	C-2	Average Arrangement Time
E.1.3	C-3	% Due Dates Missed
GENERAL		
Flow Through		
F.1.1	O-3	% Flow Through Service Requests
F.1.2	O-3	% Flow Through Service Requests - Achieved
F.1.3	O-3	% Flow Through Service Requests - LNP
Pre-Ordering		
F.2.1	PO-1	Loop Makeup Inquiry (Manual)
F.2.2	PO-2	Loop Makeup Inquiry (Electronic)

Metric No.	SQM No.	Metric Name
Ordering		
F.4.1	O-12	Average Speed of Answer
Maintenance Center		
F.5.1	M&R-6	Average Answer Time
Operator Services (Toll)		
F.6.1	OS-1	Average Speed to Answer
F.6.2	OS-2	% Answered in 10 seconds
Directory Assistance		
F.7.1	DA-1	Average Speed to Answer
F.7.2	DA-2	% Answered in 10 seconds
Billing		
F.9.1	B-3	Usage Data Delivery Accuracy
F.9.2	B-5	Usage Data Delivery Timeliness
F.9.3	B-4	Usage Data Delivery Completeness
F.9.4	B-6	Mean Time to Deliver Usage
F.9.5	B-7	Recurring Charge Completeness
F.9.6	B-8	Non-Recurring Charge Completeness
Change Management		
F.10.1	CM-1	% Software Release Notices Sent On Time
F.10.2	CM-2	Average Software Release Notice Delay Days
F.10.3	CM-3A	% Change Management Documentation Sent On Time
F.10.4	CM-3B	% Change Management Documentation (Defects, Corrections, etc.) Sent On Time
F.10.5	CM-4	Average Documentation Release Delay Days
F.10.6	CM-5	% CLEC Interface Outages Sent within 15 Minutes
New Business Requests		
F.11.1	BFR-1	% New Business Requests Processed in 30 Bus. Days
F.11.2	BFR-2A	% Quotes Provided within X Business Days
Ordering		
F.12.1	O-1	Acknowledgement Message Timeliness
F.12.2	O-2	Acknowledgement Message Completeness

Metric No.	SQM No.	Metric Name
Database Updates		
F.13.1	D-1	Average Database Update Interval
F.13.2	D-2	% Update Accuracy
F.13.3	D-3	% NXXs / LRNs Loaded by LERG Effective Date
Network Outage Notification		
F.14.1	M&R-7	Mean Time to Notify CLEC of Major Network Outages

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
RESALE - ORDERING										
<i>% Rejected Service Requests - Mechanized [O-7]</i>										
A.1.1.1	Residence/AL(%)		8.67%		6.92%		6.71%		7.50%	
A.1.1.2	Business/AL(%)		20.54%		28.42%		26.09%		28.24%	
A.1.1.4	PBX/AL(%)		0.00%		50.00%					1,2
A.1.1.6	ISDN/AL(%)		0.00%							1
<i>% Rejected Service Requests - Partially Mechanized [O-7]</i>										
A.1.2.1	Residence/AL(%)		17.58%		17.03%		21.84%		29.48%	
A.1.2.2	Business/AL(%)		43.92%		40.63%		58.33%		49.41%	
A.1.2.4	PBX/AL(%)		66.67%		0.00%		100.00%		0.00%	1,2,3,4
A.1.2.6	ISDN/AL(%)		0.00%				0.00%			1,3
<i>% Rejected Service Requests - Non-Mechanized [O-7]</i>										
A.1.3.1	Residence/AL(%)		41.28%		34.67%		31.47%		39.05%	
A.1.3.2	Business/AL(%)		54.07%		57.32%		59.90%		60.11%	
A.1.3.3	Design (Specials)/AL(%)		30.88%		34.92%		20.00%		29.41%	
A.1.3.4	PBX/AL(%)		54.55%		28.57%		33.33%		70.00%	2
A.1.3.5	Centrex/AL(%)		0.00%		75.00%		42.86%		56.25%	1,2
A.1.3.6	ISDN/AL(%)		50.00%		0.00%		50.00%		38.46%	1,2,3
<i>Reject Interval - Mechanized [O-8]</i>										
A.1.4.1	Residence/AL(%)		95.72%		95.61%		94.43%		98.13%	
A.1.4.2	Business/AL(%)		100.00%		88.46%		97.92%		95.83%	
A.1.4.4	PBX/AL(%)				0.00%					2
<i>Reject Interval - Partially Mechanized - 10 hours [O-8]</i>										
A.1.7.1	Residence/AL(%)		95.74%		94.98%		85.96%		94.22%	
A.1.7.2	Business/AL(%)		91.76%		98.46%		97.03%		98.85%	
A.1.7.4	PBX/AL(%)		50.00%		0.00%		100.00%			1,2,3
A.1.7.6	ISDN/AL(%)				0.00%					2
<i>Reject Interval - Non-Mechanized [O-8]</i>										
A.1.8.1	Residence/AL(%)		95.65%		100.00%		98.00%		100.00%	
A.1.8.2	Business/AL(%)		100.00%		100.00%		100.00%		97.27%	
A.1.8.3	Design (Specials)/AL(%)		95.45%		100.00%		100.00%		100.00%	3
A.1.8.4	PBX/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3
A.1.8.5	Centrex/AL(%)				100.00%		100.00%		100.00%	2,3,4

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.1.8.6	ISDN/AL(%)		100.00%				100.00%		100.00%	1,3,4
FOC Timeliness - Mechanized [O-9]										
A.1.9.1	Residence/AL(%)		99.85%		99.66%		99.22%		99.84%	
A.1.9.2	Business/AL(%)		99.29%		100.00%		99.12%		100.00%	
A.1.9.4	PBX/AL(%)		100.00%		100.00%					1,2
FOC Timeliness - Partially Mechanized - 10 hours [O-9]										
A.1.12.1	Residence/AL(%)		92.43%		94.12%		86.76%		90.11%	
A.1.12.2	Business/AL(%)		93.91%		91.75%		86.73%		94.50%	
A.1.12.3	Design (Specials)/AL(%)									
A.1.12.4	PBX/AL(%)		100.00%		50.00%				0.00%	1,2,4
A.1.12.6	ISDN/AL(%)		0.00%				0.00%			1,3
FOC Timeliness - Non-Mechanized [O-9]										
A.1.13.1	Residence/AL(%)		98.51%		100.00%		100.00%		100.00%	
A.1.13.2	Business/AL(%)		98.31%		98.28%		100.00%		98.48%	
A.1.13.3	Design (Specials)/AL(%)		100.00%		100.00%		100.00%		100.00%	
A.1.13.4	PBX/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
A.1.13.5	Centrex/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,4
A.1.13.6	ISDN/AL(%)		100.00%		87.50%		100.00%		100.00%	1,2,3,4
FOC & Reject Response Completeness - Mechanized [O-11]										
A.1.14.1.1	Residence/EDI/AL(%)		100.00%		99.67%		98.41%		100.00%	
A.1.14.1.2	Residence/TAG/AL(%)		99.36%		99.65%		99.32%		99.99%	
A.1.14.2.1	Business/EDI/AL(%)		100.00%		100.00%		88.37%		100.00%	
A.1.14.2.2	Business/TAG/AL(%)		95.14%		97.73%		86.52%		100.00%	
A.1.14.4.2	PBX/TAG/AL(%)		100.00%		100.00%					1,2
A.1.14.6.2	ISDN/TAG/AL(%)		0.00%							1
FOC & Reject Response Completeness - Partially Mechanized [O-11]										
A.1.15.1.1	Residence/EDI/AL(%)		100.00%		80.00%		100.00%		100.00%	4
A.1.15.1.2	Residence/TAG/AL(%)		99.04%		98.64%		99.87%		99.89%	
A.1.15.2.1	Business/EDI/AL(%)		100.00%		100.00%		94.92%		100.00%	
A.1.15.2.2	Business/TAG/AL(%)		100.00%		100.00%		100.00%		100.00%	
A.1.15.4.2	PBX/TAG/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
A.1.15.6.2	ISDN/TAG/AL(%)		100.00%				100.00%			1,3
FOC & Reject Response Completeness - Non-Mechanized [O-11]										

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.1.16.1	Residence/AL(%)		95.41%		98.00%		97.20%		98.10%	
A.1.16.2	Business/AL(%)		97.78%		97.45%		94.55%		96.63%	
A.1.16.3	Design (Specials)/AL(%)		94.12%		100.00%		95.00%		100.00%	
A.1.16.4	PBX/AL(%)		100.00%		85.71%		83.33%		100.00%	2
A.1.16.5	Centrex/AL(%)		100.00%		75.00%		90.48%		87.50%	1,2
A.1.16.6	ISDN/AL(%)		100.00%		100.00%		100.00%		92.31%	1,2,3
RESALE - PROVISIONING										
<i>Order Completion Interval [P-4]</i>										
A.2.1.1.1.1	Residence/<10 circuits/Dispatch/AL(days)	4.51	3.82	4.65	4.24	4.58	3.83	4.38	3.72	
A.2.1.1.1.2	Residence/<10 circuits/Non-Dispatch/AL(days)	0.75	0.63	0.77	0.57	0.77	0.53	0.79	0.54	
A.2.1.1.2.1	Residence/>=10 circuits/Dispatch/AL(days)	3.92	3.00	4.57	3.50	4.30	3.00	3.45	4.00	1,2,3,4
A.2.1.2.1.1	Business/<10 circuits/Dispatch/AL(days)	2.35	4.09	2.85	1.80	3.30	3.84	4.74	3.04	
A.2.1.2.1.2	Business/<10 circuits/Non-Dispatch/AL(days)	1.29	2.47	1.34	1.02	1.31	0.85	1.31	0.64	
A.2.1.2.2.1	Business/>=10 circuits/Dispatch/AL(days)	6.39		13.65		9.10	2.00	6.83	6.00	3,4
A.2.1.2.2.2	Business/>=10 circuits/Non-Dispatch/AL(days)	4.00	1.00	2.44	2.58	0.33	0.33	0.89		1,2,3
A.2.1.3.1.1	Design (Specials)<10 circuits/Dispatch/AL(days)	27.63	8.00	19.26	1.67	17.08	8.50	16.31	13.00	1,2,3,4
A.2.1.3.1.2	Design (Specials)<10 circuits/Non-Dispatch/AL(days)	4.23	3.00	8.70	5.23	7.68	4.00	12.43	4.57	3,4
A.2.1.4.1.1	PBX/<10 circuits/Dispatch/AL(days)	13.53		34.17		13.85		13.19		
A.2.1.4.1.2	PBX/<10 circuits/Non-Dispatch/AL(days)	2.44	1.78	3.25	5.04	1.47	0.56	3.15	4.05	1,2,3,4
A.2.1.4.2.2	PBX/>=10 circuits/Non-Dispatch/AL(days)	1.00	1.00	1.25		1.83		1.44	0.33	1,4
A.2.1.5.1.2	Centrex/<10 circuits/Non-Dispatch/AL(days)	1.38		1.18		1.63	3.08	1.54	7.00	4
A.2.1.5.2.1	Centrex/>=10 circuits/Dispatch/AL(days)	10.89		13.40		21.32		26.02		
A.2.1.6.1.1	ISDN/<10 circuits/Dispatch/AL(days)	25.33	12.00	16.21	8.50	27.81	13.00	22.88	13.00	1,2,3,4
A.2.1.6.1.2	ISDN/<10 circuits/Non-Dispatch/AL(days)	3.41		3.76		2.89		3.86	5.00	4
<i>% Jeopardies - Mechanized [P-2]</i>										
A.2.4.1	Residence/AL(%)	0.39%	0.63%	0.39%	0.40%	0.31%	0.32%	0.31%	0.31%	
A.2.4.2	Business/AL(%)	1.11%	0.41%	1.65%	2.12%	1.66%	1.08%	1.37%	0.50%	
A.2.4.3	Design (Specials)/AL(%)	10.76%		12.18%	0.00%	12.79%		13.40%		2
A.2.4.4	PBX/AL(%)	3.70%	0.00%	5.06%	0.00%	2.90%		7.25%	50.00%	1,2,4
A.2.4.5	Centrex/AL(%)	3.27%		2.13%		2.85%		1.64%	0.00%	4
A.2.4.6	ISDN/AL(%)	5.54%		4.91%		6.08%		10.06%		
<i>% Jeopardies - Non-Mechanized [P-2]</i>										

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.2.5.1	Residence/AL(%)		1.52%		2.66%		0.41%		0.46%	
A.2.5.2	Business/AL(%)		2.78%		0.00%		1.37%		0.00%	
A.2.5.3	Design (Specials)/AL(%)		27.27%		12.50%		18.18%		5.88%	
A.2.5.4	PBX/AL(%)		0.00%		0.00%		0.00%		0.00%	1,2,3
A.2.5.5	Centrex/AL(%)		0.00%				0.00%		0.00%	1,4
A.2.5.6	ISDN/AL(%)		16.67%		0.00%		0.00%		0.00%	1,2,3,4
<i>Average Jeopardy Notice Interval - Mechanized [P-2]</i>										
A.2.7.1	Residence/AL(hours)		108.54		111.52		115.06		113.42	
A.2.7.2	Business/AL(hours)		134.77		124.88		48.05		49.25	1,2,3,4
A.2.7.4	PBX/AL(hours)								173.20	4
<i>Average Jeopardy Notice Interval - Non-Mechanized [P-2]</i>										
A.2.8.1	Residence/AL(hours)		103.76		174.82		136.15		149.83	1,2,3,4
A.2.8.2	Business/AL(hours)		243.97				520.22			1,3
A.2.8.3	Design (Specials)/AL(hours)		463.34		156.96		269.60		304.42	1,2,3,4
A.2.8.4	PBX/AL(hours)									
A.2.8.6	ISDN/AL(hours)		184.37							1
<i>% Jeopardy Notice >= 48 hours - Mechanized [P-2]</i>										
A.2.9.1	Residence/AL(%)		100.00%		100.00%		100.00%		100.00%	
A.2.9.2	Business/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
A.2.9.4	PBX/AL(%)								100.00%	4
<i>% Jeopardy Notice >= 48 hours - Non-Mechanized [P-2]</i>										
A.2.10.1	Residence/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
A.2.10.2	Business/AL(%)		100.00%				100.00%			1,3
A.2.10.3	Design (Specials)/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
A.2.10.4	PBX/AL(%)									
A.2.10.6	ISDN/AL(%)		100.00%							1
<i>% Missed Installation Appointments [P-3]</i>										
A.2.11.1.1.1	Residence/<10 circuits/Dispatch/AL(%)	7.20%	3.21%	6.71%	4.88%	6.95%	3.65%	6.49%	3.85%	
A.2.11.1.1.2	Residence/<10 circuits/Non-Dispatch/AL(%)	0.09%	0.12%	0.01%	0.07%	0.02%	0.06%	0.01%	0.06%	
A.2.11.1.2.1	Residence/>=10 circuits/Dispatch/AL(%)	14.29%	0.00%	8.00%	50.00%	4.17%	0.00%	0.00%	0.00%	1,2,3,4
A.2.11.2.1.1	Business/<10 circuits/Dispatch/AL(%)	1.64%	14.10%	2.23%	2.08%	2.72%	1.85%	4.51%	0.00%	
A.2.11.2.1.2	Business/<10 circuits/Non-Dispatch/AL(%)	0.15%	0.00%	0.10%	0.00%	0.03%	0.49%	0.06%	0.94%	
A.2.11.2.2.1	Business/>=10 circuits/Dispatch/AL(%)	6.67%		2.78%		10.64%	0.00%	2.33%	0.00%	3,4

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.2.11.2.2.2	Business/>=10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	33.33%	0.00%	0.00%	0.00%	0.00%		1,2,3
A.2.11.3.1.1	Design (Specials)/<10 circuits/Dispatch/AL(%)	4.04%	22.22%	4.39%	0.00%	2.88%	0.00%	4.66%	14.29%	1,2,4
A.2.11.3.1.2	Design (Specials)/<10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	0.59%	0.00%	0.00%	0.00%	0.00%	0.00%	3
A.2.11.4.1.1	PBX/<10 circuits/Dispatch/AL(%)	0.00%		0.00%		0.00%		0.00%		
A.2.11.4.1.2	PBX/<10 circuits/Non-Dispatch/AL(%)	1.72%	0.00%	1.52%	0.00%	2.22%	0.00%	0.00%	0.00%	1,2,3,4
A.2.11.4.2.2	PBX/>=10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	0.00%		0.00%		0.00%	0.00%	1,4
A.2.11.5.1.1	Centrex/<10 circuits/Dispatch/AL(%)	6.51%		1.62%	0.00%	2.99%		2.10%		2
A.2.11.5.1.2	Centrex/<10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	0.00%		0.00%	0.00%	0.19%	0.00%	1
A.2.11.5.2.1	Centrex/>=10 circuits/Dispatch/AL(%)	0.00%		0.00%		4.76%	0.00%	13.33%		3
A.2.11.5.2.2	Centrex/>=10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	0.00%		0.00%	0.00%	1.75%		1,3
A.2.11.6.1.1	ISDN/<10 circuits/Dispatch/AL(%)	8.67%	16.67%	7.87%	0.00%	5.06%	100.00%	4.23%	100.00%	1,2,3,4
A.2.11.6.1.2	ISDN/<10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	1.35%	0.00%	2.37%		3.33%	0.00%	1,2,4
% Provisioning Troubles within 30 Days [P-9]										
A.2.12.1.1.1	Residence/<10 circuits/Dispatch/AL(%)	10.48%	8.87%	10.78%	8.73%	10.37%	10.77%	10.82%	11.36%	
A.2.12.1.1.2	Residence/<10 circuits/Non-Dispatch/AL(%)	2.81%	5.27%	2.98%	3.48%	2.65%	3.14%	2.51%	2.52%	
A.2.12.1.2.1	Residence/>=10 circuits/Dispatch/AL(%)	16.67%		23.81%	0.00%	8.00%	0.00%	4.17%	0.00%	2,3,4
A.2.12.2.1.1	Business/<10 circuits/Dispatch/AL(%)	10.63%	4.48%	10.49%	7.69%	11.26%	4.17%	10.78%	11.11%	
A.2.12.2.1.2	Business/<10 circuits/Non-Dispatch/AL(%)	5.48%	6.67%	4.87%	3.88%	5.25%	6.41%	6.68%	4.85%	
A.2.12.2.2.1	Business/>=10 circuits/Dispatch/AL(%)	15.79%		23.33%		25.00%		23.40%	0.00%	4
A.2.12.2.2.2	Business/>=10 circuits/Non-Dispatch/AL(%)	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	50.00%	2,3,4
A.2.12.3.1.1	Design (Specials)/<10 circuits/Dispatch/AL(%)	7.04%	24.00%	7.50%	33.33%	6.06%	0.00%	7.28%	7.69%	2,3
A.2.12.3.1.2	Design (Specials)/<10 circuits/Non-Dispatch/AL(%)	2.70%	0.00%	1.57%	8.33%	4.12%	0.00%	3.14%	0.00%	1,4
A.2.12.4.1.1	PBX/<10 circuits/Dispatch/AL(%)	25.00%	50.00%	6.67%		0.00%		0.00%		1
A.2.12.4.1.2	PBX/<10 circuits/Non-Dispatch/AL(%)	3.28%	0.00%	0.00%	0.00%	1.52%	0.00%	0.00%	0.00%	1,2,3,4
A.2.12.4.2.2	PBX/>=10 circuits/Non-Dispatch/AL(%)	10.00%	0.00%	0.00%	0.00%	0.00%		0.00%		1,2
A.2.12.5.1.1	Centrex/<10 circuits/Dispatch/AL(%)	5.42%		4.44%		4.86%	0.00%	5.43%		3
A.2.12.5.1.2	Centrex/<10 circuits/Non-Dispatch/AL(%)	4.65%	0.00%	4.95%	0.00%	8.02%		2.99%	0.00%	1,2
A.2.12.5.2.1	Centrex/>=10 circuits/Dispatch/AL(%)	35.71%	0.00%	11.11%		20.00%		19.05%	0.00%	1,4
A.2.12.5.2.2	Centrex/>=10 circuits/Non-Dispatch/AL(%)	16.67%		17.65%	0.00%	12.50%		12.90%	0.00%	2,4
A.2.12.6.1.1	ISDN/<10 circuits/Dispatch/AL(%)	4.14%		6.94%	0.00%	6.02%	0.00%	3.37%	100.00%	2,3,4
A.2.12.6.1.2	ISDN/<10 circuits/Non-Dispatch/AL(%)	0.58%	0.00%	1.52%	0.00%	0.45%	0.00%	0.00%		1,2,3
Average Completion Notice Interval - Mechanized [P-5]										
A.2.14.1.1.1	Residence/<10 circuits/Dispatch/AL(hours)	1.04	0.22	0.77	0.23	1.10	0.22	1.10	0.13	

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.2.14.1.1.2	Residence/<10 circuits/Non-Dispatch/AL(hours)	0.51	0.53	0.50	0.53	0.55	0.59	0.58	0.60	
A.2.14.1.2.1	Residence/>=10 circuits/Dispatch/AL(hours)	0.12	0.02	0.02	0.02	0.65	0.02	0.72	0.02	1,2,3,4
A.2.14.2.1.1	Business/<10 circuits/Dispatch/AL(hours)	1.40	1.77	2.05	0.22	1.76	2.06	2.44	0.22	
A.2.14.2.1.2	Business/<10 circuits/Non-Dispatch/AL(hours)	1.51	2.57	2.09	0.47	2.43	0.51	1.26	0.53	
A.2.14.2.2.1	Business/>=10 circuits/Dispatch/AL(hours)	2.17		1.90		1.81	0.02	3.93		3
A.2.14.2.2.2	Business/>=10 circuits/Non-Dispatch/AL(hours)	0.47	0.58	0.51	0.42	53.72		0.53		1,2
A.2.14.3.1.1	Design (Specials)/<10 circuits/Dispatch/AL(hours)	250.65		162.12	0.02	142.14		144.96		2
A.2.14.4.1.2	PBX/<10 circuits/Non-Dispatch/AL(hours)	9.67		15.06	0.41	9.79		15.32	0.34	2,4
A.2.14.4.2.2	PBX/>=10 circuits/Non-Dispatch/AL(hours)	0.45	0.47	0.58		0.41		0.46		1
A.2.14.5.1.2	Centrex/<10 circuits/Non-Dispatch/AL(hours)	3.81		0.75		4.52		3.62	0.43	4
Average Completion Notice Interval - Non-Mechanized [P-5]										
A.2.15.1.1.1	Residence/<10 circuits/Dispatch/AL(hours)		14.09		13.79		12.97		14.60	
A.2.15.1.1.2	Residence/<10 circuits/Non-Dispatch/AL(hours)		5.56		5.99		10.43		6.56	
A.2.15.1.2.1	Residence/>=10 circuits/Dispatch/AL(hours)				0.02					2
A.2.15.2.1.1	Business/<10 circuits/Dispatch/AL(hours)		46.61		17.56		31.27		26.66	
A.2.15.2.1.2	Business/<10 circuits/Non-Dispatch/AL(hours)		12.32		13.65		12.93		11.19	
A.2.15.2.2.1	Business/>=10 circuits/Dispatch/AL(hours)								14.90	4
A.2.15.2.2.2	Business/>=10 circuits/Non-Dispatch/AL(hours)				14.00		19.90			2,3
A.2.15.3.1.1	Design (Specials)/<10 circuits/Dispatch/AL(hours)		37.74		111.74		98.95		511.30	1,2,4
A.2.15.3.1.2	Design (Specials)/<10 circuits/Non-Dispatch/AL(hours)		29.82		62.85		85.27		23.61	3
A.2.15.4.1.1	PBX/<10 circuits/Dispatch/AL(hours)									
A.2.15.4.1.2	PBX/<10 circuits/Non-Dispatch/AL(hours)		12.38		18.69		21.73		24.29	1,2,3,4
A.2.15.4.2.2	PBX/>=10 circuits/Non-Dispatch/AL(hours)								14.00	4
A.2.15.5.1.1	Centrex/<10 circuits/Dispatch/AL(hours)				0.02					2
A.2.15.5.1.2	Centrex/<10 circuits/Non-Dispatch/AL(hours)		14.00				14.00		13.19	1,4
A.2.15.5.2.1	Centrex/>=10 circuits/Dispatch/AL(hours)						0.02			3
A.2.15.5.2.2	Centrex/>=10 circuits/Non-Dispatch/AL(hours)		14.00				0.30			1,3
A.2.15.6.1.1	ISDN/<10 circuits/Dispatch/AL(hours)		28.10		82.86		92.12		16.43	1,2,3,4
A.2.15.6.1.2	ISDN/<10 circuits/Non-Dispatch/AL(hours)		40.37		15.17				14.00	1,2,4
Service Order Accuracy [P-11]										
A.2.25.1.1.1	Residence/<10 circuits/Dispatch/AL(%)		92.14%		96.55%		90.77%		98.86%	
A.2.25.1.1.2	Residence/<10 circuits/Non-Dispatch/AL(%)		95.38%		94.29%		98.82%		98.56%	

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.2.25.1.2.1	Residence/>=10 circuits/Dispatch/AL(%)		100.00%		88.24%		100.00%		100.00%	4
A.2.25.2.1.1	Business/<10 circuits/Dispatch/AL(%)		91.33%		95.76%		88.82%		94.44%	
A.2.25.2.1.2	Business/<10 circuits/Non-Dispatch/AL(%)		93.85%		97.93%		96.11%		97.22%	
A.2.25.2.2.1	Business/>=10 circuits/Dispatch/AL(%)		100.00%		77.78%		77.78%		76.92%	2
A.2.25.2.2.2	Business/>=10 circuits/Non-Dispatch/AL(%)		84.62%		97.56%		92.59%		91.89%	
A.2.25.3.1.1	Design (Specials)/<10 circuits/Dispatch/AL(%)		81.08%		91.43%		80.49%		96.47%	
A.2.25.3.1.2	Design (Specials)/<10 circuits/Non-Dispatch/AL(%)		91.84%		94.78%		91.43%		91.36%	
A.2.25.3.2.1	Design (Specials)/>=10 circuits/Dispatch/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
A.2.25.3.2.2	Design (Specials)/>=10 circuits/Non-Dispatch/AL(%)		100.00%		90.00%		92.31%		88.89%	1,4
RESALE - MAINTENANCE AND REPAIR										
<i>Missed Repair Appointments [M&R-1]</i>										
A.3.1.1.1	Residence/Dispatch/AL(%)	5.49%	2.28%	5.25%	1.96%	5.94%	2.56%	6.13%	1.73%	
A.3.1.1.2	Residence/Non-Dispatch/AL(%)	1.02%	0.00%	1.12%	0.00%	1.14%	0.60%	1.44%	0.53%	
A.3.1.2.1	Business/Dispatch/AL(%)	8.60%	6.94%	8.06%	2.04%	10.91%	12.90%	11.09%	19.05%	
A.3.1.2.2	Business/Non-Dispatch/AL(%)	3.68%	0.00%	2.53%	3.23%	3.09%	18.18%	3.23%	0.00%	
A.3.1.3.1	Design (Specials)/Dispatch/AL(%)	1.91%	0.00%	1.41%	0.00%	1.34%	0.00%	0.86%	0.00%	
A.3.1.3.2	Design (Specials)/Non-Dispatch/AL(%)	0.55%	0.00%	0.24%	0.00%	0.26%	0.00%	0.51%	3.57%	1
A.3.1.4.1	PBX/Dispatch/AL(%)	8.33%	33.33%	9.84%	0.00%	6.45%	0.00%	13.64%	91.67%	1,2
A.3.1.4.2	PBX/Non-Dispatch/AL(%)	1.41%	0.00%	5.00%	0.00%	3.85%	0.00%	1.64%	0.00%	2,4
A.3.1.5.1	Centrex/Dispatch/AL(%)	14.73%	0.00%	21.51%	0.00%	17.87%	0.00%	15.96%	0.00%	
A.3.1.5.2	Centrex/Non-Dispatch/AL(%)	7.00%	0.00%	3.83%	0.00%	6.49%	0.00%	2.88%	0.00%	1,3
A.3.1.6.1	ISDN/Dispatch/AL(%)	6.12%	0.00%	5.17%	0.00%	12.99%	0.00%	3.51%	0.00%	1,3,4
A.3.1.6.2	ISDN/Non-Dispatch/AL(%)	1.47%	0.00%	0.90%	0.00%	0.00%	0.00%	0.00%	33.33%	1,2,3,4
<i>Customer Trouble Report Rate [M&R-2]</i>										
A.3.2.1.1	Residence/Dispatch/AL(%)	1.81%	1.93%	1.92%	1.86%	2.12%	2.03%	2.01%	2.03%	
A.3.2.1.2	Residence/Non-Dispatch/AL(%)	1.04%	0.48%	0.98%	0.42%	1.18%	0.48%	1.21%	0.55%	
A.3.2.2.1	Business/Dispatch/AL(%)	1.07%	1.08%	1.17%	0.74%	1.23%	0.98%	1.14%	1.34%	
A.3.2.2.2	Business/Non-Dispatch/AL(%)	0.61%	0.54%	0.57%	0.47%	0.68%	0.35%	0.70%	0.65%	
A.3.2.3.1	Design (Specials)/Dispatch/AL(%)	0.85%	0.91%	0.85%	1.48%	1.02%	1.59%	0.90%	0.93%	
A.3.2.3.2	Design (Specials)/Non-Dispatch/AL(%)	1.07%	0.33%	1.26%	0.52%	1.19%	0.82%	1.21%	1.37%	
A.3.2.4.1	PBX/Dispatch/AL(%)	0.12%	0.32%	0.10%	0.20%	0.11%	2.12%	0.12%	1.22%	
A.3.2.4.2	PBX/Non-Dispatch/AL(%)	0.12%	0.00%	0.10%	0.20%	0.09%	0.00%	0.11%	0.30%	

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.3.2.5.1	Centrex/Dispatch/AL(%)	0.29%	0.00%	0.35%	0.00%	0.32%	0.00%	0.32%	0.00%	
A.3.2.5.2	Centrex/Non-Dispatch/AL(%)	0.26%	0.30%	0.26%	0.00%	0.31%	0.37%	0.29%	0.00%	
A.3.2.6.1	ISDN/Dispatch/AL(%)	0.03%	0.27%	0.04%	0.00%	0.05%	0.58%	0.04%	0.34%	
A.3.2.6.2	ISDN/Non-Dispatch/AL(%)	0.09%	0.41%	0.08%	0.12%	0.10%	0.12%	0.08%	0.34%	
<i>Maintenance Average Duration [M&R-3]</i>										
A.3.3.1.1	Residence/Dispatch/AL(hours)	21.66	17.04	22.67	16.03	26.14	18.86	25.01	20.63	
A.3.3.1.2	Residence/Non-Dispatch/AL(hours)	8.82	4.67	8.77	4.27	11.07	5.75	10.65	6.12	
A.3.3.2.1	Business/Dispatch/AL(hours)	12.58	14.22	11.64	8.78	12.77	10.69	12.04	17.65	
A.3.3.2.2	Business/Non-Dispatch/AL(hours)	4.29	2.08	3.76	2.84	4.20	4.00	3.92	7.27	
A.3.3.3.1	Design (Specials)/Dispatch/AL(hours)	5.40	3.76	5.16	4.65	5.12	4.02	5.11	4.76	
A.3.3.3.2	Design (Specials)/Non-Dispatch/AL(hours)	2.29	0.91	2.03	2.28	2.22	2.67	2.33	2.56	1
A.3.3.4.1	PBX/Dispatch/AL(hours)	8.61	10.08	12.83	0.84	8.22	9.22	8.17	49.92	1,2
A.3.3.4.2	PBX/Non-Dispatch/AL(hours)	4.03	0.00	3.69	0.50	5.80	0.00	4.79	3.96	2,4
A.3.3.5.1	Centrex/Dispatch/AL(hours)	14.78	0.00	12.27	0.00	13.25	0.00	12.21	0.00	
A.3.3.5.2	Centrex/Non-Dispatch/AL(hours)	3.36	9.13	2.63	0.00	4.57	5.00	3.71	0.00	1,3
A.3.3.6.1	ISDN/Dispatch/AL(hours)	7.76	2.14	8.58	0.00	10.65	4.44	8.61	2.89	1,3,4
A.3.3.6.2	ISDN/Non-Dispatch/AL(hours)	3.41	1.68	3.16	0.40	2.91	9.13	2.46	11.48	1,2,3,4
<i>% Repeat Troubles within 30 Days [M&R-4]</i>										
A.3.4.1.1	Residence/Dispatch/AL(%)	16.35%	10.62%	18.02%	11.04%	17.84%	9.40%	18.04%	11.08%	
A.3.4.1.2	Residence/Non-Dispatch/AL(%)	14.41%	11.11%	15.47%	13.04%	15.85%	9.04%	16.49%	13.83%	
A.3.4.2.1	Business/Dispatch/AL(%)	14.40%	12.50%	12.49%	10.20%	14.16%	6.45%	12.18%	9.52%	
A.3.4.2.2	Business/Non-Dispatch/AL(%)	12.01%	11.11%	11.46%	19.35%	12.77%	0.00%	12.97%	12.20%	
A.3.4.3.1	Design (Specials)/Dispatch/AL(%)	22.53%	26.32%	21.34%	25.81%	20.54%	9.09%	22.72%	15.79%	
A.3.4.3.2	Design (Specials)/Non-Dispatch/AL(%)	18.98%	42.86%	15.09%	9.09%	13.92%	23.53%	15.54%	10.71%	1
A.3.4.4.1	PBX/Dispatch/AL(%)	11.11%	0.00%	11.48%	0.00%	4.84%	14.29%	3.03%	0.00%	1,2
A.3.4.4.2	PBX/Non-Dispatch/AL(%)	7.04%	0.00%	3.33%	0.00%	5.77%	0.00%	4.92%	0.00%	2,4
A.3.4.5.1	Centrex/Dispatch/AL(%)	16.10%	0.00%	15.41%	0.00%	13.17%	0.00%	13.03%	0.00%	
A.3.4.5.2	Centrex/Non-Dispatch/AL(%)	15.95%	0.00%	14.56%	0.00%	13.96%	0.00%	11.51%	0.00%	1,3
A.3.4.6.1	ISDN/Dispatch/AL(%)	6.12%	50.00%	25.86%	0.00%	23.38%	20.00%	5.26%	0.00%	1,3,4
A.3.4.6.2	ISDN/Non-Dispatch/AL(%)	11.76%	66.67%	12.61%	100.00%	5.11%	0.00%	10.43%	0.00%	1,2,3,4
<i>Out of Service > 24 hours [M&R-5]</i>										
A.3.5.1.1	Residence/Dispatch/AL(%)	26.38%	18.45%	29.00%	20.39%	34.86%	27.96%	35.12%	33.93%	
A.3.5.1.2	Residence/Non-Dispatch/AL(%)	15.91%	1.89%	18.15%	5.41%	21.82%	12.79%	19.89%	10.75%	

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
A.3.5.2.1	Business/Dispatch/AL(%)	10.10%	9.76%	9.91%	0.00%	9.53%	4.88%	12.80%	20.00%	
A.3.5.2.2	Business/Non-Dispatch/AL(%)	4.92%	0.00%	3.71%	0.00%	5.82%	0.00%	3.40%	0.00%	
A.3.5.3.1	Design (Specials)/Dispatch/AL(%)	1.91%	0.00%	1.41%	0.00%	1.34%	0.00%	0.86%	0.00%	
A.3.5.3.2	Design (Specials)/Non-Dispatch/AL(%)	0.55%	0.00%	0.24%	0.00%	0.26%	0.00%	0.51%	3.57%	1
A.3.5.4.1	PBX/Dispatch/AL(%)	8.06%	50.00%	10.20%	0.00%	3.77%	0.00%	6.67%	100.00%	1,2,4
A.3.5.4.2	PBX/Non-Dispatch/AL(%)	1.67%	0.00%	5.88%	0.00%	5.00%	0.00%	1.85%	0.00%	2,4
A.3.5.5.1	Centrex/Dispatch/AL(%)	13.58%	0.00%	10.29%	0.00%	8.84%	0.00%	17.68%	0.00%	
A.3.5.5.2	Centrex/Non-Dispatch/AL(%)	1.69%	0.00%	1.74%	0.00%	6.51%	0.00%	2.17%	0.00%	1,3
A.3.5.6.1	ISDN/Dispatch/AL(%)	6.25%	0.00%	5.17%	0.00%	12.99%	0.00%	3.51%	0.00%	1,3,4
A.3.5.6.2	ISDN/Non-Dispatch/AL(%)	1.48%	0.00%	0.90%	0.00%	0.00%	0.00%	0.00%	33.33%	1,2,3,4
RESALE - BILLING										
<i>Invoice Accuracy [B-1]</i>										
A.4.1	AL(%)	99.13%	99.80%	99.33%	99.23%	98.94%	98.70%	98.33%	97.31%	
<i>Mean Time to Deliver Invoices - CRIS [B-2]</i>										
A.4.2	Region(business days)	3.68	3.56	3.86	3.27	3.47	3.16	3.82	3.37	
UNBUNDLED NETWORK ELEMENTS - ORDERING										
<i>% Rejected Service Requests - Mechanized [O-7]</i>										
B.1.1.1	Switch Ports/AL(%)									
B.1.1.3	Loop + Port Combinations/AL(%)		17.22%		19.22%		28.28%		17.65%	
B.1.1.4	Combo Other/AL(%)		100.00%							1
B.1.1.5	xDSL (ADSL, HDSL and UCL)/AL(%)		17.65%		22.22%		28.28%		11.02%	
B.1.1.6	ISDN Loop (UDN, UDC)/AL(%)		0.00%		25.00%		33.33%		19.44%	1,2,3
B.1.1.7	Line Sharing/AL(%)		15.58%		24.00%		20.34%		22.73%	
B.1.1.8	2W Analog Loop Design/AL(%)		38.51%		35.48%		44.44%		43.24%	
B.1.1.12	2W Analog Loop w/LNP Design/AL(%)		87.50%		40.00%				75.00%	1,2,4
B.1.1.14	Other Design/AL(%)		19.30%		20.75%		11.11%		20.45%	
B.1.1.15	Other Non-Design/AL(%)		29.53%		27.19%		30.49%		28.36%	
B.1.1.17	LNP Standalone/AL(%)		7.14%		8.77%		5.52%		7.09%	
<i>% Rejected Service Requests - Partially Mechanized [O-7]</i>										
B.1.2.3	Loop + Port Combinations/AL(%)		31.19%		37.91%		37.28%		35.56%	
B.1.2.5	xDSL (ADSL, HDSL and UCL)/AL(%)		0.00%		7.69%		0.00%			1
B.1.2.6	ISDN Loop (UDN, UDC)/AL(%)		13.04%		10.17%		16.25%		20.00%	4
B.1.2.7	Line Sharing/AL(%)		41.18%		40.00%		60.00%		12.50%	4

Federal Communications Commission

FCC 02-260

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.1.2.8	2W Analog Loop Design/AL(%)		27.45%		12.50%		31.03%		42.86%	
B.1.2.12	2W Analog Loop w/LNP Design/AL(%)		32.69%		20.83%		80.00%		34.29%	
B.1.2.14	Other Design/AL(%)		45.10%		36.59%		15.87%		14.29%	
B.1.2.15	Other Non-Design/AL(%)		33.41%		23.94%		20.19%		25.71%	
B.1.2.17	LNP Standalone/AL(%)		16.95%		17.21%		15.16%		16.76%	
% Rejected Service Requests - Non-Mechanized [O-7]										
B.1.3.1	Switch Ports/AL(%)		100.00%							1
B.1.3.2	Local Interoffice Transport/AL(%)				50.00%				33.33%	2,4
B.1.3.3	Loop + Port Combinations/AL(%)		51.06%		41.97%		51.87%		51.30%	
B.1.3.4	Combo Other/AL(%)						0.00%			3
B.1.3.5	xDSL (ADSL, HDSL and UCL)/AL(%)		34.78%		28.00%		36.36%		20.00%	
B.1.3.6	ISDN Loop (UDN, UDC)/AL(%)		50.00%		50.00%		20.00%		50.00%	1,2,3,4
B.1.3.7	Line Sharing/AL(%)		28.57%		25.00%		0.00%		33.33%	1,2,3
B.1.3.8	2W Analog Loop Design/AL(%)		35.71%		21.05%		26.92%		32.81%	
B.1.3.9	2W Analog Loop Non-Design/AL(%)				45.83%		43.40%		41.46%	
B.1.3.12	2W Analog Loop w/LNP Design/AL(%)		44.44%		0.00%				66.67%	1,2,4
B.1.3.13	2W Analog Loop w/LNP Non-Design/AL(%)				100.00%					2
B.1.3.14	Other Design/AL(%)		41.03%		35.00%		56.10%		30.43%	
B.1.3.15	Other Non-Design/AL(%)		45.59%		38.24%		30.12%		31.51%	
B.1.3.16	INP Standalone/AL(%)		41.67%		50.00%		35.71%		58.82%	
B.1.3.17	LNP Standalone/AL(%)		23.81%		28.07%		23.88%		24.55%	
Reject Interval - Mechanized [O-8]										
B.1.4.3	Loop + Port Combinations/AL(%)		96.42%		94.82%		96.29%		94.31%	
B.1.4.4	Combo Other/AL(%)		50.00%							1
B.1.4.5	xDSL (ADSL, HDSL and UCL)/AL(%)		100.00%		100.00%		96.43%		100.00%	
B.1.4.6	ISDN Loop (UDN, UDC)/AL(%)				0.00%		0.00%		100.00%	2,3,4
B.1.4.7	Line Sharing/AL(%)		66.67%		85.00%		71.43%		54.55%	
B.1.4.8	2W Analog Loop Design/AL(%)		85.48%		90.91%		96.43%		93.75%	
B.1.4.12	2W Analog Loop w/LNP Design/AL(%)		100.00%		100.00%				100.00%	1,2,4
B.1.4.14	Other Design/AL(%)		63.64%		100.00%		60.00%		66.67%	4
B.1.4.15	Other Non-Design/AL(%)		76.69%		75.23%		73.67%		61.90%	
B.1.4.17	LNP Standalone/AL(%)		97.50%		97.78%		100.00%		88.64%	
Reject Interval - Partially Mechanized - 10 hours [O-8]										

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.1.7.3	Loop + Port Combinations/AL(%)		97.66%		97.30%		72.46%		96.96%	
B.1.7.5	xDSL (ADSL, HDSL and UCL)/AL(%)				100.00%					2
B.1.7.6	ISDN Loop (UDN, UDC)/AL(%)		88.89%		100.00%		84.62%		50.00%	1,2,4
B.1.7.7	Line Sharing/AL(%)		100.00%		100.00%		66.67%		100.00%	1,2,3,4
B.1.7.8	2W Analog Loop Design/AL(%)		78.57%		50.00%		66.67%		83.33%	2,3,4
B.1.7.12	2W Analog Loop w/LNP Design/AL(%)		94.12%		80.00%		81.82%		83.33%	2
B.1.7.14	Other Design/AL(%)		92.00%		100.00%		80.00%		60.00%	4
B.1.7.15	Other Non-Design/AL(%)		79.43%		92.08%		98.11%		93.53%	
B.1.7.17	LNP Standalone/AL(%)		94.37%		100.00%		87.50%		87.50%	
Reject Interval - Non-Mechanized [O-8]										
B.1.8.1	Switch Ports/AL(%)		100.00%							1
B.1.8.2	Local Interoffice Transport/AL(%)				100.00%				100.00%	2,4
B.1.8.3	Loop + Port Combinations/AL(%)		97.98%		100.00%		99.22%		99.29%	
B.1.8.5	xDSL (ADSL, HDSL and UCL)/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
B.1.8.6	ISDN Loop (UDN, UDC)/AL(%)		100.00%		100.00%		100.00%		0.00%	1,2,3,4
B.1.8.7	Line Sharing/AL(%)		100.00%		100.00%				100.00%	1,2,4
B.1.8.8	2W Analog Loop Design/AL(%)		100.00%		100.00%		100.00%		100.00%	
B.1.8.9	2W Analog Loop Non-Design/AL(%)				100.00%		100.00%		100.00%	
B.1.8.12	2W Analog Loop w/LNP Design/AL(%)		75.00%						100.00%	1,4
B.1.8.13	2W Analog Loop w/LNP Non-Design/AL(%)				100.00%					2
B.1.8.14	Other Design/AL(%)		100.00%		100.00%		100.00%		100.00%	4
B.1.8.15	Other Non-Design/AL(%)		100.00%		99.00%		98.78%		100.00%	
B.1.8.16	LNP Standalone/AL(%)		100.00%		100.00%		100.00%		100.00%	2,3
B.1.8.17	LNP Standalone/AL(%)		100.00%		99.17%		100.00%		100.00%	
FOC Timeliness - Mechanized [O-9]										
B.1.9.3	Loop + Port Combinations/AL(%)		99.22%		99.08%		98.91%		97.58%	
B.1.9.5	xDSL (ADSL, HDSL and UCL)/AL(%)		95.60%		98.84%		95.59%		99.04%	
B.1.9.6	ISDN Loop (UDN, UDC)/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3
B.1.9.7	Line Sharing/AL(%)		98.51%		100.00%		100.00%		100.00%	
B.1.9.8	2W Analog Loop Design/AL(%)		100.00%		95.24%		96.88%		95.24%	
B.1.9.12	2W Analog Loop w/LNP Design/AL(%)		100.00%		100.00%				100.00%	1,2,4
B.1.9.14	Other Design/AL(%)		95.74%		100.00%		95.31%		91.43%	
B.1.9.15	Other Non-Design/AL(%)		95.16%		95.07%		96.13%		92.53%	

Federal Communications Commission

FCC 02-260

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.1.9.17	LNP Standalone/AL(%)		99.81%		98.50%		90.60%		93.13%	
<i>FOC Timeliness - Partially Mechanized - 10 hours [O-9]</i>										
B.1.12.3	Loop + Port Combinations/AL(%)		91.37%		89.79%		79.92%		90.50%	
B.1.12.5	xDSL (ADSL, HDSL and UCL)/AL(%)		100.00%		90.91%		92.31%			1
B.1.12.6	ISDN Loop (UDN, UDC)/AL(%)		95.16%		98.04%		94.37%		100.00%	4
B.1.12.7	Line Sharing/AL(%)		100.00%		80.00%		83.33%		100.00%	3,4
B.1.12.8	2W Analog Loop Design/AL(%)		97.62%		92.31%		91.67%		88.89%	4
B.1.12.12	2W Analog Loop w/LNP Design/AL(%)		82.86%		82.35%		100.00%		100.00%	3
B.1.12.14	Other Design/AL(%)		96.30%		80.77%		93.88%		91.43%	
B.1.12.15	Other Non-Design/AL(%)		70.12%		91.25%		95.05%		91.88%	
B.1.12.17	LNP Standalone/AL(%)		95.65%		96.88%		87.93%		93.56%	
<i>FOC Timeliness - Non-Mechanized [O-9]</i>										
B.1.13.1	Switch Ports/AL(%)									
B.1.13.2	Local Interoffice Transport/AL(%)				100.00%				100.00%	2,4
B.1.13.3	Loop + Port Combinations/AL(%)		97.65%		98.89%		96.46%		99.20%	
B.1.13.4	Combo Other/AL(%)						100.00%			3
B.1.13.5	xDSL (ADSL, HDSL and UCL)/AL(%)		100.00%		100.00%		100.00%		100.00%	4
B.1.13.6	ISDN Loop (UDN, UDC)/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
B.1.13.7	Line Sharing/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3
B.1.13.8	2W Analog Loop Design/AL(%)		100.00%		100.00%		100.00%		100.00%	
B.1.13.9	2W Analog Loop Non-Design/AL(%)				100.00%		100.00%		100.00%	
B.1.13.12	2W Analog Loop w/LNP Design/AL(%)		100.00%						100.00%	1,4
B.1.13.14	Other Design/AL(%)		95.83%		100.00%		100.00%		83.33%	
B.1.13.15	Other Non-Design/AL(%)		100.00%		96.82%		100.00%		100.00%	
B.1.13.16	INP Standalone/AL(%)		100.00%		100.00%		100.00%		100.00%	2,3,4
B.1.13.17	LNP Standalone/AL(%)		100.00%		99.64%		100.00%		100.00%	
<i>FOC & Reject Response Completeness - Mechanized [O-11]</i>										
B.1.14.3.1	Loop + Port Combinations/EDI/AL(%)		99.68%		100.00%		96.12%		99.92%	
B.1.14.3.2	Loop + Port Combinations/TAG/AL(%)		99.24%		98.23%		97.97%		99.89%	
B.1.14.4.1	Combo Other/EDI/AL(%)		100.00%							1
B.1.14.5.1	xDSL (ADSL, HDSL and UCL)/EDI/AL(%)		95.96%		97.98%		97.80%		98.99%	
B.1.14.5.2	xDSL (ADSL, HDSL and UCL)/TAG/AL(%)		85.00%		77.78%		100.00%		100.00%	3
B.1.14.6.1	ISDN Loop (UDN, UDC)/EDI/AL(%)		100.00%				100.00%		100.00%	1,3

Alabama Performance Metric Data

Metric Number	Metric Name (SQM Number) and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.1.14.6.2	ISDN Loop (UDN, UDC)/TAG/AL(%)		66.67%		100.00%				100.00%	1,2,4
B.1.14.7.1	Line Sharing/EDI/AL(%)		100.00%		100.00%		100.00%		97.44%	
B.1.14.7.2	Line Sharing/TAG/AL(%)		94.74%		100.00%		100.00%		100.00%	3,4
B.1.14.8.1	2W Analog Loop Design/EDI/AL(%)		100.00%		100.00%		97.67%		100.00%	
B.1.14.8.2	2W Analog Loop Design/TAG/AL(%)		100.00%		100.00%		90.00%		100.00%	2
B.1.14.12.1	2W Analog Loop w/LNP Design/EDI/AL(%)		100.00%							1
B.1.14.12.2	2W Analog Loop w/LNP Design/TAG/AL(%)		100.00%		60.00%				87.50%	1,2,4
B.1.14.14.1	Other Design/EDI/AL(%)		100.00%		100.00%		83.33%		100.00%	
B.1.14.14.2	Other Design/TAG/AL(%)		100.00%		93.33%		100.00%		100.00%	
B.1.14.15.1	Other Non-Design/EDI/AL(%)		100.00%		100.00%		95.65%		100.00%	2
B.1.14.15.2	Other Non-Design/TAG/AL(%)		99.16%		97.85%		98.16%		99.53%	
B.1.14.17.1	LNP Standalone/EDI/AL(%)		100.00%		100.00%		98.31%		100.00%	1
B.1.14.17.2	LNP Standalone/TAG/AL(%)		99.64%		100.00%		97.77%		95.61%	
FOC & Reject Response Completeness - Partially Mechanized [O-11]										
B.1.15.3.1	Loop + Port Combinations/EDI/AL(%)		100.00%		99.71%		97.77%		99.46%	
B.1.15.3.2	Loop + Port Combinations/TAG/AL(%)		99.76%		99.46%		99.72%		99.61%	
B.1.15.5.1	xDSL (ADSL, HDSL and UCL)/EDI/AL(%)		0.00%		83.33%		100.00%			1
B.1.15.5.2	xDSL (ADSL, HDSL and UCL)/TAG/AL(%)		20.00%		100.00%		100.00%			1,2,3
B.1.15.6.1	ISDN Loop (UDN, UDC)/EDI/AL(%)		100.00%		100.00%		95.00%		100.00%	4
B.1.15.6.2	ISDN Loop (UDN, UDC)/TAG/AL(%)		100.00%		100.00%		100.00%		100.00%	4
B.1.15.7.1	Line Sharing/EDI/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
B.1.15.7.2	Line Sharing/TAG/AL(%)		100.00%		100.00%		100.00%			1,2,3
B.1.15.8.1	2W Analog Loop Design/EDI/AL(%)		100.00%		100.00%		100.00%		100.00%	2,3,4
B.1.15.8.2	2W Analog Loop Design/TAG/AL(%)		100.00%		92.31%		100.00%		100.00%	4
B.1.15.12.1	2W Analog Loop w/LNP Design/EDI/AL(%)		100.00%		100.00%				100.00%	2,4
B.1.15.12.2	2W Analog Loop w/LNP Design/TAG/AL(%)		100.00%		100.00%		100.00%		100.00%	
B.1.15.14.1	Other Design/EDI/AL(%)		100.00%		100.00%		92.45%		100.00%	
B.1.15.14.2	Other Design/TAG/AL(%)		100.00%		94.44%		100.00%		100.00%	4
B.1.15.15.1	Other Non-Design/EDI/AL(%)		88.33%		88.68%		100.00%		100.00%	
B.1.15.15.2	Other Non-Design/TAG/AL(%)		97.77%		98.28%		99.58%		99.79%	
B.1.15.17.1	LNP Standalone/EDI/AL(%)		100.00%		100.00%		100.00%		100.00%	
B.1.15.17.2	LNP Standalone/TAG/AL(%)		100.00%		99.76%		100.00%		99.57%	
FOC & Reject Response Completeness - Non-Mechanized [O-11]										

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.1.16.1	Switch Ports/AL(%)		100.00%							1
B.1.16.2	Local Interoffice Transport/AL(%)				100.00%				100.00%	2,4
B.1.16.3	Loop + Port Combinations/AL(%)		97.87%		96.89%		94.61%		95.17%	
B.1.16.4	Combo Other/AL(%)						100.00%			3
B.1.16.5	xDSL (ADSL, HDSL and UCL)/AL(%)		100.00%		96.00%		95.45%		100.00%	
B.1.16.6	ISDN Loop (UDN, UDC)/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
B.1.16.7	Line Sharing/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3
B.1.16.8	2W Analog Loop Design/AL(%)		100.00%		98.25%		98.72%		100.00%	
B.1.16.9	2W Analog Loop Non-Design/AL(%)				100.00%		96.23%		100.00%	
B.1.16.12	2W Analog Loop w/LNP Design/AL(%)		100.00%		100.00%				100.00%	1,2,4
B.1.16.13	2W Analog Loop w/LNP Non-Design/AL(%)				100.00%					2
B.1.16.14	Other Design/AL(%)		100.00%		100.00%		100.00%		100.00%	
B.1.16.15	Other Non-Design/AL(%)		98.77%		98.47%		95.75%		99.16%	
B.1.16.16	INP Standalone/AL(%)		95.83%		94.44%		64.29%		100.00%	
B.1.16.17	LNP Standalone/AL(%)		98.10%		98.82%		95.16%		98.92%	
UNBUNDLED NETWORK ELEMENTS - PROVISIONING										
<i>Order Completion Interval [P-4]</i>										
B.2.1.2.1.1	Local Interoffice Transport/<10 circuits/Dispatch/AL(days)	14.87		15.51		14.07		16.47	30.00	4
B.2.1.3.1.1	Loop + Port Combinations/<10 circuits/Dispatch/AL(days)	3.63	3.57	4.05	2.94	4.27	3.01	4.57	2.85	
B.2.1.3.1.2	Loop + Port Combinations/<10 circuits/Non-Dispatch/AL(days)	0.77	0.56	0.80	0.55	0.80	0.57	0.82	0.57	
B.2.1.3.1.3	Loop + Port Combinations/<10 circuits/Switch Based Orders/AL(days)	0.33	0.33	0.33	0.33	0.33	0.33	0.33	0.33	
B.2.1.3.1.4	Loop + Port Combinations/<10 circuits/Dispatch In/AL(days)	1.53	1.11	1.51	1.09	1.49	1.14	1.53	1.22	
B.2.1.3.2.1	Loop + Port Combinations/>=10 circuits/Dispatch/AL(days)	6.20	2.00	10.36	4.63	10.85	2.00	9.31	6.90	1,2,3,4
B.2.1.3.2.2	Loop + Port Combinations/>=10 circuits/Non-Dispatch/AL(days)	3.90		1.67		4.73		4.57	0.33	4
B.2.1.3.2.3	Loop + Port Combinations/>=10 circuits/Switch Based Orders/AL(days)	0.33		0.33		0.33		0.33	0.33	4

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.2.1.3.2.4	Loop + Port Combinations/>=10 circuits/Dispatch In/AL(days)	6.05		2.31		5.78		5.39		
B.2.1.4.1.1	Combo Other/<10 circuits/Dispatch/AL(days)	4.95	12.75	4.92	12.00	5.11	10.67	5.51		1,2,3
B.2.1.6.3.1	UNE ISDN/<6 circuits/Dispatch/AL(days)	16.95	9.89	12.80	10.60	12.85	9.73	12.65	11.21	
B.2.1.7.3.1	Line Sharing/<6 circuits/Dispatch/AL(days)	11.21	5.29	4.94	5.25	4.87	4.00	3.57	3.33	1,2,3,4
B.2.1.7.3.2	Line Sharing/<6 circuits/Non-Dispatch/AL(days)	3.68	3.72	3.82	3.72	3.74	3.82	2.43	4.00	
B.2.1.8.1.1	2W Analog Loop Design/<10 circuits/Dispatch/AL(days)	3.63	4.18	4.05	4.42	4.27	4.00	4.57	4.07	
B.2.1.8.2.1	2W Analog Loop Design/>=10 circuits/Dispatch/AL(days)	6.20	6.00	10.36		10.85		9.31		1
B.2.1.12.1.1	2W Analog Loop w/LNP Design/<10 circuits/Dispatch/AL(days)	3.63	4.86	4.05	5.10	4.27	5.00	4.57	6.00	1,3,4
B.2.1.14.1.1	Other Design/<10 circuits/Dispatch/AL(days)	27.80		19.64		19.83		18.12		
B.2.1.15.1.1	Other Non-Design/<10 circuits/Dispatch/AL(days)	3.63	6.00	4.05	6.00	4.27	6.25	4.57		1,2,3
B.2.1.15.1.2	Other Non-Design/<10 circuits/Non-Dispatch/AL(days)	0.77		0.80		0.80		0.82		
B.2.1.16.1.2	INP (Standalone)/<10 circuits/Non-Dispatch/AL(days)	0.77	0.33	0.79	0.33	0.79	0.33	0.82		1,2,3
B.2.1.17.1.2	LNP (Standalone)/<10 circuits/Non-Dispatch/AL(days)	0.77	0.53	0.79	0.55	0.79	0.54	0.82	0.63	
B.2.1.17.2.2	LNP (Standalone)/>=10 circuits/Non-Dispatch/AL(days)	4.00	0.67	2.44	0.33	0.33	6.00	0.89	0.33	1,2,3,4
B.2.1.18.1.1	Digital Loop < DS1/<10 circuits/Dispatch/AL(days)	11.95	6.84	7.39	6.97	7.45	6.58	5.76	7.29	
B.2.1.19.1.1	Digital Loop >= DS1/<10 circuits/Dispatch/AL(days)	28.98	5.88	18.52	7.48	37.05	6.33	25.92	6.03	
Order Completion Interval within X days [P-4]										
B.2.2.2	xDSL (ADSL, HDSL and UCL) Loop w/o Conditioning/<6 circuits/Dispatch/AL(days)		4.44		4.37		3.81		4.42	
% Jeopardies - Mechanized [P-2]										
B.2.5.3	Loop + Port Combinations/AL(%)	0.45%	0.60%	0.48%	0.29%	0.41%	0.28%	0.39%	0.16%	
B.2.5.4	Combo Other/AL(%)	5.86%		6.81%	0.00%	6.49%		7.27%		2

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.2.5.5	xDSL (ADSL, HDSL and UCL)/AL(%)	10.69%		15.48%		7.92%		7.27%	3.03%	
B.2.5.6	UNE ISDN/AL(%)	8.33%	18.52%	3.86%	10.34%	4.02%	22.22%	6.47%	17.65%	
B.2.5.7	Line Sharing/AL(%)	10.69%	0.00%	15.48%	0.00%	7.92%	0.00%	7.27%	0.00%	1,2,3,4
B.2.5.8	2W Analog Loop Design/AL(%)	0.45%	7.14%	0.48%	0.00%	0.41%	5.88%	0.39%	0.00%	4
B.2.5.12	2W Analog Loop w/LNP Design/AL(%)	0.45%	5.26%	0.48%	0.00%	0.41%	0.00%	0.39%	0.00%	3
B.2.5.14	Other Design/AL(%)	11.33%		12.07%		12.85%		14.34%		
B.2.5.15	Other Non-Design/AL(%)	0.45%		0.48%		0.41%		0.39%		
B.2.5.16	INP (Standalone)/AL(%)	0.44%	0.00%	0.48%		0.39%		0.38%		1
B.2.5.17	LNP (Standalone)/AL(%)	0.44%	0.00%	0.48%	0.00%	0.39%	0.00%	0.38%	0.00%	
B.2.5.18	Digital Loop < DS1/AL(%)	10.60%	18.52%	14.52%	10.34%	8.14%	22.22%	8.07%	10.45%	
B.2.5.19	Digital Loop >= DS1/AL(%)	7.76%	75.86%	9.09%	77.78%	11.58%	82.80%	16.40%	80.95%	
% Jeopardies - Non-Mechanized [P-2]										
B.2.6.2	Local Interoffice Transport/AL(%)								0.00%	4
B.2.6.3	Loop + Port Combinations/AL(%)		0.00%		2.48%		2.85%		1.40%	
B.2.6.4	Combo Other/AL(%)		42.86%		33.33%		50.00%		100.00%	1,2,3,4
B.2.6.5	xDSL (ADSL, HDSL and UCL)/AL(%)		0.00%		2.00%		6.12%		0.00%	
B.2.6.6	UNE ISDN/AL(%)		0.00%		100.00%		0.00%		0.00%	1,2,3,4
B.2.6.7	Line Sharing/AL(%)		0.00%		0.00%		0.00%		0.00%	
B.2.6.8	2W Analog Loop Design/AL(%)		5.88%		7.14%		15.38%		4.17%	
B.2.6.12	2W Analog Loop w/LNP Design/AL(%)		0.00%		0.00%				0.00%	1,2,4
B.2.6.15	Other Non-Design/AL(%)		0.00%		0.00%		0.00%			1,3
B.2.6.16	INP (Standalone)/AL(%)				0.00%		0.00%			2,3
B.2.6.17	LNP (Standalone)/AL(%)		0.00%		0.00%		0.00%		0.00%	
B.2.6.18	Digital Loop < DS1/AL(%)		0.00%		3.92%		5.88%		0.00%	
B.2.6.19	Digital Loop >= DS1/AL(%)		68.75%		71.43%		45.45%		71.43%	2,4
Average Jeopardy Notice Interval - Mechanized [P-2]										
B.2.8.3	Loop + Port Combinations/AL(hours)		115.43		153.61		165.18		189.51	4
B.2.8.5	xDSL (ADSL, HDSL and UCL)/AL(hours)								169.75	4
B.2.8.6	UNE ISDN/AL(hours)		258.78		244.26		275.48		287.84	1,2,3,4
B.2.8.8	2W Analog Loop Design/AL(hours)		114.65				104.43			1,3
B.2.8.12	2W Analog Loop w/LNP Design/AL(hours)		124.75							1
B.2.8.18	Digital Loop < DS1/AL(hours)		258.78		244.26		275.48		268.16	1,2,3,4
B.2.8.19	Digital Loop >= DS1/AL(hours)		225.76		206.99		176.29		182.79	

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
<i>Average Jeopardy Notice Interval - Non-Mechanized [P-2]</i>										
B.2.9.3	Loop + Port Combinations/AL(hours)				391.68		170.65		241.12	2,3,4
B.2.9.4	Combo Other/AL(hours)		333.46		352.50		328.31		328.50	1,2,3,4
B.2.9.5	xDSL (ADSL, HDSL and UCL)/AL(hours)				160.47		142.32			2,3
B.2.9.6	UNE ISDN/AL(hours)				112.43					2
B.2.9.8	2W Analog Loop Design/AL(hours)				135.95		88.50		664.37	2,3,4
B.2.9.18	Digital Loop < DS1/AL(hours)				136.45		142.32			2,3
B.2.9.19	Digital Loop >= DS1/AL(hours)		196.20		221.98		227.65		166.46	2,3,4
<i>% Jeopardy Notice >= 48 hours - Mechanized [P-2]</i>										
B.2.10.3	Loop + Port Combinations/AL(%)		100.00%		100.00%		94.74%		100.00%	4
B.2.10.5	xDSL (ADSL, HDSL and UCL)/AL(%)								100.00%	4
B.2.10.6	UNE ISDN/AL(%)		80.00%		100.00%		100.00%		80.00%	1,2,3,4
B.2.10.8	2W Analog Loop Design/AL(%)		100.00%				100.00%			1,3
B.2.10.12	2W Analog Loop w/LNP Design/AL(%)		100.00%							1
B.2.10.18	Digital Loop < DS1/AL(%)		80.00%		100.00%		100.00%		83.33%	1,2,3,4
B.2.10.19	Digital Loop >= DS1/AL(%)		100.00%		100.00%		100.00%		100.00%	
<i>% Jeopardy Notice >= 48 hours - Non-Mechanized [P-2]</i>										
B.2.11.3	Loop + Port Combinations/AL(%)				100.00%		85.71%		100.00%	2,3,4
B.2.11.4	Combo Other/AL(%)		100.00%		100.00%		100.00%		100.00%	1,2,3,4
B.2.11.5	xDSL (ADSL, HDSL and UCL)/AL(%)				100.00%		100.00%			2,3
B.2.11.6	UNE ISDN/AL(%)				100.00%					2
B.2.11.8	2W Analog Loop Design/AL(%)				100.00%		100.00%		100.00%	2,3,4
B.2.11.18	Digital Loop < DS1/AL(%)				100.00%		100.00%			2,3
B.2.11.19	Digital Loop >= DS1/AL(%)		100.00%		100.00%		100.00%		100.00%	2,3,4
<i>Coordinated Customers Conversions [P-7]</i>										
B.2.12.2	Loops with LNP/AL(%)		100.00%		100.00%		100.00%		100.00%	3
<i>% Hot Cuts > 15 minutes Early [P-7A]</i>										
B.2.13.2	Time-Specific SL2/AL(%)		0.00%		0.00%					1
B.2.13.4	Non-Time Specific SL2/AL(%)		0.00%		0.00%				0.00%	2,4
<i>Hot Cut Timeliness [P-7A]</i>										
B.2.14.2	Time-Specific SL2/AL(%)		100.00%		100.00%					1
B.2.14.4	Non-Time Specific SL2/AL(%)		100.00%		100.00%				100.00%	2,4
<i>% Hot Cuts > 15 minutes Late [P-7A]</i>										

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Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes	
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC		
B.2.15.2	Time-Specific SL2/AL(%)		0.00%		0.00%					1	
B.2.15.4	Non-Time Specific SL2/AL(%)		0.00%		0.00%				0.00%	2,4	
% Provisioning Troubles within 7 Days - Hot Cuts [P-7C]											
B.2.17.1.1	UNE Loop Design/Dispatch/AL(%)				0.00%				0.00%	16.67%	4
% Missed Installation Appointments [P-3]											
B.2.18.2.1.1	Local Interoffice Transport/<10 circuits/Dispatch/AL(%)	0.25%		0.00%		0.77%			0.84%	0.00%	4
B.2.18.3.1.1	Loop + Port Combinations/<10 circuits/Dispatch/AL(%)	4.94%	4.84%	4.88%	3.08%	5.50%	3.13%		5.92%	5.82%	
B.2.18.3.1.2	Loop + Port Combinations/<10 circuits/Non-Dispatch/AL(%)	0.10%	0.19%	0.02%	0.11%	0.02%	0.06%		0.02%	0.22%	
B.2.18.3.1.3	Loop + Port Combinations/<10 circuits/Switch Based Orders/AL(%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	
B.2.18.3.1.4	Loop + Port Combinations/<10 circuits/Dispatch In/AL(%)	0.24%	0.39%	0.04%	0.25%	0.04%	0.09%		0.04%	0.39%	
B.2.18.3.2.1	Loop + Port Combinations/>=10 circuits/Dispatch/AL(%)	8.33%	0.00%	4.48%	11.11%	7.53%	0.00%		2.56%	14.29%	1,2,3,4
B.2.18.3.2.2	Loop + Port Combinations/>=10 circuits/Non-Dispatch/AL(%)	0.00%		2.17%		0.00%	0.00%		1.43%	0.00%	3,4
B.2.18.3.2.3	Loop + Port Combinations/>=10 circuits/Switch Based Orders/AL(%)	0.00%		0.00%		0.00%			0.00%	0.00%	4
B.2.18.3.2.4	Loop + Port Combinations/>=10 circuits/Dispatch In/AL(%)	0.00%		3.13%		0.00%	0.00%		1.72%		3
B.2.18.4.1.1	Combo Other/<10 circuits/Dispatch/AL(%)	4.94%	16.67%	4.91%	0.00%	5.39%	0.00%		5.84%		1,2,3
B.2.18.5.1.1	xDSL (ADSL, HDSL and UCL)/<10 circuits/Dispatch/AL(%)	21.81%	1.92%	9.87%	0.00%	10.49%	0.00%		12.54%	2.04%	
B.2.18.6.1.1	UNE ISDN/<10 circuits/Dispatch/AL(%)	15.85%	3.03%	14.66%	0.00%	9.68%	2.50%		10.96%	2.94%	
B.2.18.7.1.1	Line Sharing/<10 circuits/Dispatch/AL(%)	21.81%	14.29%	9.87%	25.00%	10.49%	0.00%		12.54%	0.00%	1,2,3,4
B.2.18.7.1.2	Line Sharing/<10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	0.07%	0.00%	0.00%	0.00%		0.06%	0.00%	
B.2.18.8.1.1	2W Analog Loop Design/<10 circuits/Dispatch/AL(%)	4.94%	0.00%	4.88%	2.38%	5.50%	0.00%		5.92%	0.00%	
B.2.18.8.2.1	2W Analog Loop Design/>=10 circuits/Dispatch/AL(%)	8.33%	0.00%	4.48%		7.53%			2.56%		1

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.2.18.12.1.1	2W Analog Loop w/LNP Design/<10 circuits/Dispatch/AL(%)	4.94%	0.00%	4.88%	0.00%	5.50%	0.00%	5.92%	0.00%	3
B.2.18.14.1.1	Other Design/<10 circuits/Dispatch/AL(%)	5.00%		5.43%		3.41%		4.61%		
B.2.18.15.1.1	Other Non-Design/<10 circuits/Dispatch/AL(%)	4.94%	0.00%	4.88%	0.00%	5.50%	16.67%	5.92%		1,3
B.2.18.15.1.2	Other Non-Design/<10 circuits/Non-Dispatch/AL(%)	0.10%		0.02%		0.02%		0.02%		
B.2.18.16.1.2	INP (Standalone)/<10 circuits/Non-Dispatch/AL(%)	0.10%	0.00%	0.02%	0.00%	0.02%	0.00%	0.01%		1,2,3
B.2.18.17.1.2	LNP (Standalone)/<10 circuits/Non-Dispatch/AL(%)	0.10%	0.12%	0.02%	0.13%	0.02%	1.72%	0.01%	0.00%	
B.2.18.17.2.2	LNP (Standalone)/>=10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	33.33%	0.00%	0.00%	0.00%	0.00%	0.00%	1,2,3,4
B.2.18.18.1.1	Digital Loop < DS1/<10 circuits/Dispatch/AL(%)	20.19%	2.41%	9.69%	0.00%	9.73%	1.15%	11.65%	2.41%	
B.2.18.19.1.1	Digital Loop >= DS1/<10 circuits/Dispatch/AL(%)	7.45%	10.53%	7.88%	16.07%	0.88%	6.25%	0.69%	7.79%	
% Provisioning Troubles within 30 Days [P-9]										
B.2.19.3.1.1	Loop + Port Combinations/<10 circuits/Dispatch/AL(%)	10.40%	11.66%	10.54%	9.68%	10.54%	11.08%	10.67%	9.40%	
B.2.19.3.1.2	Loop + Port Combinations/<10 circuits/Non-Dispatch/AL(%)	2.92%	4.99%	3.06%	4.34%	2.77%	4.23%	2.67%	3.22%	
B.2.19.3.1.3	Loop + Port Combinations/<10 circuits/Switch Based Orders/AL(%)	3.09%	5.28%	3.18%	3.32%	2.99%	3.54%	2.75%	2.93%	
B.2.19.3.1.4	Loop + Port Combinations/<10 circuits/Dispatch In/AL(%)	2.68%	4.70%	2.89%	5.47%	2.48%	5.09%	2.57%	3.38%	
B.2.19.3.2.1	Loop + Port Combinations/>=10 circuits/Dispatch/AL(%)	18.46%	0.00%	21.67%	25.00%	17.91%	22.22%	17.20%	0.00%	1,2,3,4
B.2.19.3.2.2	Loop + Port Combinations/>=10 circuits/Non-Dispatch/AL(%)	10.45%	100.00%	9.38%		8.70%		6.35%	0.00%	1,4
B.2.19.3.2.3	Loop + Port Combinations/>=10 circuits/Switch Based Orders/AL(%)	16.00%		8.70%		7.14%		8.33%		
B.2.19.3.2.4	Loop + Port Combinations/>=10 circuits/Dispatch In/AL(%)	7.14%	100.00%	9.76%		9.38%		5.88%	0.00%	1,4
B.2.19.4.1.1	Combo Other/<10 circuits/Dispatch/AL(%)	10.26%	25.00%	10.39%	16.67%	10.32%	0.00%	10.46%	25.00%	1,2,3,4
B.2.19.5.1.1	xDSL (ADSL, HDSL and UCL)/<10 circuits/Dispatch/AL(%)	2.64%	7.14%	3.86%	1.92%	3.95%	1.96%	4.88%	2.13%	

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.2.19.6.1.1	UNE ISDN/<10 circuits/Dispatch/AL(%)	9.43%	11.11%	4.88%	3.03%	8.62%	13.79%	6.45%	7.50%	
B.2.19.7.1.1	Line Sharing/<10 circuits/Dispatch/AL(%)	2.64%	28.57%	3.86%	28.57%	3.95%	0.00%	4.88%	0.00%	1,2,3,4
B.2.19.7.1.2	Line Sharing/<10 circuits/Non-Dispatch/AL(%)	2.23%	2.38%	1.37%	6.78%	2.09%	14.71%	2.11%	12.90%	
B.2.19.8.1.1	2W Analog Loop Design/<10 circuits/Dispatch/AL(%)	10.40%	12.24%	10.54%	4.17%	10.54%	4.76%	10.67%	0.00%	
B.2.19.8.2.1	2W Analog Loop Design/>=10 circuits/Dispatch/AL(%)	18.46%		21.67%	0.00%	17.91%		17.20%		2
B.2.19.12.1.1	2W Analog Loop w/LNP Design/<10 circuits/Dispatch/AL(%)	10.40%	0.00%	10.54%	0.00%	10.54%	4.76%	10.67%	33.33%	4
B.2.19.14.1.1	Other Design/<10 circuits/Dispatch/AL(%)	7.13%		7.64%		6.26%		6.45%		
B.2.19.15.1.1	Other Non-Design/<10 circuits/Dispatch/AL(%)	10.40%	40.00%	10.54%	20.00%	10.54%	20.00%	10.67%	0.00%	1,2,4
B.2.19.16.1.2	INP (Standalone)/<10 circuits/Non-Dispatch/AL(%)	2.92%	0.00%	3.06%	0.00%	2.76%	0.00%	2.67%	0.00%	1,2,3,4
B.2.19.17.1.2	LNP (Standalone)/<10 circuits/Non-Dispatch/AL(%)	2.92%	0.00%	3.06%	0.00%	2.76%	0.00%	2.67%	0.00%	
B.2.19.17.2.2	LNP (Standalone)/>=10 circuits/Non-Dispatch/AL(%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1,2,3,4
B.2.19.18.1.1	Digital Loop < DS1/<10 circuits/Dispatch/AL(%)	3.56%	7.41%	4.19%	2.41%	4.40%	6.25%	5.20%	4.60%	
B.2.19.19.1.1	Digital Loop >= DS1/<10 circuits/Dispatch/AL(%)	1.30%	13.41%	8.07%	11.84%	2.42%	10.71%	0.00%	12.50%	
<i>Average Completion Notice Interval - Mechanized [P-5]</i>										
B.2.21.3.1.1	Loop + Port Combinations/<10 circuits/Dispatch/AL(hours)	1.29	0.16	1.51	0.17	1.40	0.77	1.45	0.26	
B.2.21.3.1.2	Loop + Port Combinations/<10 circuits/Non-Dispatch/AL(hours)	0.56	0.58	0.57	0.59	0.63	0.69	0.63	0.67	
B.2.21.3.1.3	Loop + Port Combinations/<10 circuits/Switch Based Orders/AL(hours)	0.56	0.53	0.61	0.56	0.67	0.61	0.66	0.61	
B.2.21.3.1.4	Loop + Port Combinations/<10 circuits/Dispatch In/AL(hours)	0.56	0.64	0.52	0.62	0.57	0.73	0.59	0.71	
B.2.21.3.2.1	Loop + Port Combinations/>=10 circuits/Dispatch/AL(hours)	1.47	0.02	1.00	0.02	2.94	0.02	4.04	0.02	1,2,3,4
B.2.21.3.2.2	Loop + Port Combinations/>=10 circuits/Non-Dispatch/AL(hours)	0.46		0.49		3.98		0.47		
B.2.21.3.2.4	Loop + Port Combinations/>=10 circuits/Dispatch In/AL(hours)	0.47		0.48		0.53		0.45		

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.2.21.4.1.1	Combo Other/<10 circuits/Dispatch/AL(hours)	12.73		9.50	88.13	9.80		10.51		2
B.2.21.5.1.1	xDSL (ADSL, HDSL and UCL)/<10 circuits/Dispatch/AL(hours)	3.57		4.54		3.48		2.83	2.47	
B.2.21.6.1.1	UNE ISDN/<10 circuits/Dispatch/AL(hours)	56.01	21.50	58.64	5.85	40.17	9.60	41.67	20.82	
B.2.21.7.1.2	Line Sharing/<10 circuits/Non-Dispatch/AL(hours)	0.57	0.47	0.46	0.55	0.70	0.48	0.67	0.32	1,2,3,4
B.2.21.8.1.1	2W Analog Loop Design/<10 circuits/Dispatch/AL(hours)	1.29	3.63	1.51	18.03	1.40	7.48	1.45	15.63	4
B.2.21.8.2.1	2W Analog Loop Design/>=10 circuits/Dispatch/AL(hours)	1.47	0.08	1.00		2.94		4.04		1
B.2.21.12.1.1	2W Analog Loop w/LNP Design/<10 circuits/Dispatch/AL(hours)	1.29	25.74	1.51	42.31	1.40	1.75	1.45	1.55	3
B.2.21.16.1.2	INP (Standalone)/<10 circuits/Non-Dispatch/AL(hours)	0.55	0.28	0.57		0.62		0.62		1
B.2.21.17.1.2	LNP (Standalone)/<10 circuits/Non-Dispatch/AL(hours)	0.55	0.46	0.57	0.46	0.62	0.49	0.62	0.51	
B.2.21.17.2.2	LNP (Standalone)/>=10 circuits/Non-Dispatch/AL(hours)	0.47	0.02	0.51		43.08	0.50	0.53	0.57	1,3,4
B.2.21.18.1.1	Digital Loop < DS1/<10 circuits/Dispatch/AL(hours)	13.85	21.50	23.84	5.85	12.54	9.60	13.82	11.64	
B.2.21.19.1.1	Digital Loop >= DS1/<10 circuits/Dispatch/AL(hours)	231.29	29.88	143.05	37.69	425.46	31.46	207.00	40.29	
Average Completion Notice Interval - Non-Mechanized [P-5]										
B.2.22.2.1.1	Local Interoffice Transport/<10 circuits/Dispatch/AL(hours)								19.74	4
B.2.22.3.1.1	Loop + Port Combinations/<10 circuits/Dispatch/AL(hours)		17.59		9.60		13.13		13.52	
B.2.22.3.1.2	Loop + Port Combinations/<10 circuits/Non-Dispatch/AL(hours)		5.69		5.59		2.69		6.28	
B.2.22.3.1.3	Loop + Port Combinations/<10 circuits/Switch Based Orders/AL(hours)		4.26		4.72		2.04		6.03	
B.2.22.3.1.4	Loop + Port Combinations/<10 circuits/Dispatch In/AL(hours)		8.38		10.32		5.53		7.43	

Federal Communications Commission

FCC 02-260

Alabama Performance Metric Data

Metric Number	Metric Name [SQM Number] and Disaggregation	March		April		May		June		Notes
		BST	CLEC	BST	CLEC	BST	CLEC	BST	CLEC	
B.2.22.3.2.1	Loop + Port Combinations/>=10 circuits/Dispatch/AL(hours)		36.90		0.02		15.57			1,2,3
B.2.22.3.2.2	Loop + Port Combinations/>=10 circuits/Non-Dispatch/AL(hours)						24.45		14.00	3,4
B.2.22.3.2.3	Loop + Port Combinations/>=10 circuits/Switch Based Orders/AL(hours)								14.00	4
B.2.22.3.2.4	Loop + Port Combinations/>=10 circuits/Dispatch In/AL(hours)						24.45			3
B.2.22.4.1.1	Combo Other/<10 circuits/Dispatch/AL(hours)		100.33		82.69		44.31			1,2,3
B.2.22.5.1.1	xDSL (ADSL, HDSL and UCL)/<10 circuits/Dispatch/AL(hours)		10.11		13.99		10.10		20.29	
B.2.22.6.1.1	UNE ISDN/<10 circuits/Dispatch/AL(hours)		47.61		15.17		18.00		17.07	1,2,3,4
B.2.22.7.1.1	Line Sharing/<10 circuits/Dispatch/AL(hours)		0.65		0.02		0.02		0.02	1,2,3,4
B.2.22.7.1.2	Line Sharing/<10 circuits/Non-Dispatch/AL(hours)		0.50		0.53		0.48		0.49	
B.2.22.8.1.1	2W Analog Loop Design/<10 circuits/Dispatch/AL(hours)		49.67		48.34		39.20		29.86	
B.2.22.12.1.1	2W Analog Loop w/LNP Design/<10 circuits/Dispatch/AL(hours)		38.91		14.25				17.50	1,2,4
B.2.22.14.1.1	Other Design/<10 circuits/Dispatch/AL(hours)									
B.2.22.15.1.1	Other Non-Design/<10 circuits/Dispatch/AL(hours)		42.15		30.21		23.36			1,3
B.2.22.15.1.2	Other Non-Design/<10 circuits/Non-Dispatch/AL(hours)									
B.2.22.16.1.2	INP (Standalone)/<10 circuits/Non-Dispatch/AL(hours)				0.72		34.45			2,3
B.2.22.17.1.2	LNP (Standalone)/<10 circuits/Non-Dispatch/AL(hours)		2.75		1.71		0.94		0.94	
B.2.22.17.2.2	LNP (Standalone)/>=10 circuits/Non-Dispatch/AL(hours)		0.64		0.27		0.46		0.65	1,2,3,4
B.2.22.18.1.1	Digital Loop < DS1/<10 circuits/Dispatch/AL(hours)		11.65		14.02		10.58		20.10	
B.2.22.19.1.1	Digital Loop >= DS1/<10 circuits/Dispatch/AL(hours)		52.94		66.01		63.40		38.02	2,4