

BELLSOUTH 2nd AMENDED RESPONSE TO GA EXCEPTION 186



GA Exception 186

November 15, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Remedy Replication Review. (PMR7.5)

Exception:

BellSouth may use incorrect benchmarks by using its current process for calculating remedy results for P-11 (“Service Order Accuracy”).

Background:

Self-Effectuating Enforcement Mechanism (SEEM) reports are created to illustrate BellSouth’s Operational Support System enforcement mechanism. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes SEEM reports of remedy values for Competitive Local Exchange Carriers (CLEC) engaged in business activity with BellSouth in the State of Georgia and for the Georgia Public Service Commission.

Issue:

In order to determine the number of orders (“Total Affected Volume ”), which did not meet the 95% benchmark for measure P-11, BellSouth multiplies the difference between the monthly service order accuracy rate and the benchmark by the number of completed orders. BellSouth determines the number of completed orders by obtaining the denominator of the appropriate product for the P-3 or P-12 (“Percent Missed Installation”) measures.

For example, BellSouth may determine that based on statistical sampling the service order accuracy for “UNE Loops Non-Design, <10 circuits, Dispatch” was 92% for the June 2002 data month. BellSouth obtains the number of completed GA “UNE Loops Non-Design, <10 circuits, Dispatch” CLEC orders from the BellSouth Monthly State Summary (MSS) Report for the June 2002 data month.

In the case of “UNE Loops Non-Design, <10 circuits, Dispatch” there are multiple products from the MSS Report which BellSouth uses for comparison (e.g, “2W Analog Loop Non-Design, <10 circuits, Dispatch”, “2W Analog Loop w/INP Non-Design, <10 circuits, Dispatch”, etc...). For each of these products from the MSS Report BellSouth would multiply the number of completed orders by 3% (95%-92%).

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However, for benchmark measures, a small number of orders may decrease the benchmark. Therefore if the number of orders for each disaggregation in the MSS report used to compare to “UNE Loops Non-Design, <10 circuits, Dispatch” to, is less than 30, the benchmark will decrease. For example, if there are only 10 completed orders, the required benchmark will decrease from 95% to 80% for the particular disaggregation.

BearingPoint discovered that BellSouth may use incorrect benchmarks by using its current process for calculating remedy results for P-11 (“Service Order Accuracy). BellSouth should aggregate the total number of order across different MSS products when determining the proper benchmark instead of creating separate benchmarks for each MSS product. Since the service order accuracy result could be representative of many MSS products, the benchmark should be based on the aggregation of all orders across these many MSS products.

Table 1 shows an example using BellSouth’s current process while Table 2 shows the same example using the alternative process:

Table 1: BellSouth’s Current Process

SOA Product	SOA Result	MSS Product	Total Orders	Benchmark Adjusted for Small Sample Size	Rounded Total Affected Volume
UNE Loops Non-Design, <10 circuits, Dispatch	92%	2W Analog Loop Non-Design, <10 circuits, Dispatch	5	80%	0
	92%	2W Analog Loop w/INP Non-Design, <10 circuits, Dispatch	7	85.71%	0
	92%	2W Analog Loop w/LNP Non-Design, <10 circuits, Dispatch	9	77.78%	0
	92%	INP (Standalone), <10 circuits, Dispatch	11	81.82%	0
	92%	Line Sharing, <10 circuits, Dispatch	13	84.62%	0
	92%	LNP (Standalone), <10 circuits, Dispatch	15	86.67%	0
	92%	Loop + Port Combinations, <10 circuits, Dispatch	17	82.35%	0
	92%	Other Non-Design, <10 circuits, Dispatch	19	84.21%	0
	92%	Switch Ports, <10 circuits, Dispatch	21	85.71%	0
	92%	2W Analog Loop Non-Design, <10 circuits, Dispatch	23	86.96%	0

Table 2: Alternative Process

SOA Product	SOA Result	MSS Product	Total Orders	Benchmark Adjusted for Small Sample Size	Rounded Total Affected Volume
UNE Loops Non-Design, <10 circuits, Dispatch	92%	2W Analog Loop Non-Design, <10 circuits, Dispatch	140	95%	5
		2W Analog Loop w/INP Non-Design, <10 circuits, Dispatch			
		2W Analog Loop w/LNP Non-Design, <10 circuits, Dispatch			
		INP (Standalone), <10 circuits, Dispatch			
		Line Sharing, <10 circuits, Dispatch			

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SOA Product	SOA Result	MSS Product	Total Orders	Benchmark Adjusted for Small Sample Size	Rounded Total Affected Volume
		LNP (Standalone), <10 circuits, Dispatch			
		Loop + Port Combinations, <10 circuits, Dispatch			
		Other Non-Design, <10 circuits, Dispatch			
		Switch Ports, <10 circuits, Dispatch			
		2W Analog Loop Non-Design, <10 circuits, Dispatch			

In Table 1 there would not be a remedy due since the small number of completed orders caused the required benchmarks to be below the SOA result for each disaggregation. In Table 2 there would be remedy due since the sum of the MSS total orders meant that the required benchmark remained at 95%.

Impact:

CLECs and the State Commission rely on BellSouth's SEEM reports to assess the remedies, if applicable, to be paid to them. BellSouth's current process for calculating remedy results for P-11 may create inaccurate results. Without accurate SEEM Reports, CLECs and the State Commission might not be paid correct remedy amounts by BellSouth.

BellSouth Response:

BellSouth is revising its calculation methodology for Service Order Accuracy, and will be recalculating SOA from the February data month forward using the methods BearingPoint has described above, with one exception. While we agree that the subtotals of the individual PMIA orders by product should be rolled up to the appropriate SOA disaggregation (UNE Loops Non-Design, <10 circuits, Dispatch, for example), we feel the small sample size table should be utilized in terms of the service order sampling universes – in other words, if the service orders in the sample universe totaled less than 30 for UNE Loops Non-Design, <10 circuits, Dispatch, the small sample size table would be applied. BellSouth feels this would more accurately reflect the purpose of the small sample table, since the table would be utilized when the sample universe – the universe used to determine the monthly accuracy percentages – totaled 30 or below based on level of disaggregation. This ensures that the same benchmark is utilized, by level of disaggregation, across the region, and the use of the Percent Missed Installation Appointment service order totals allow for a proper by-state calculation. Recalculations will begin with March data, and all adjustments and recalculations will be posted during the October production run. Any adjustments to remedies that may result in this change in procedure will be documented, and this process will be used going forward.

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BellSouth Amended Response:

BellSouth has revised its calculation methodology for Service Order Accuracy, and will be recalculating SOA from the September 2002 data month forward using the methods BearingPoint has described above, with one exception. While we agree that the subtotals of the individual PMIA orders by product should be rolled up to the appropriate SOA disaggregation (UNE Loops Non-Design, <10 circuits, Dispatch, for example), we feel the small sample size table should be utilized in terms of the service order universes – in other words, if the service orders in the universe totaled less than 30 for UNE Loops Non-Design, <10 circuits, Dispatch, the small sample size table would be applied. BellSouth feels this would more accurately reflect the purpose of the small sample table, since the table would be utilized when the service order universe – the universe used to determine the monthly accuracy percentages – totaled 30 or below based on level of disaggregation. This ensures that the same benchmark is utilized, by level of disaggregation, across the region, and the use of the Percent Missed Installation Appointment service order totals allow for a proper by-state calculation. This recalculation will start with the September 2002 data month. Any adjustments to remedies that result will be made, and the Interim Solutions calculation document will be updated to reflect any changes that are made.

BellSouth 2nd Amended Response:

Per BearingPoint's direction, BellSouth will change the way it is currently calculating Service Order Accuracy. BellSouth agrees with the methodology BearingPoint has described above, with one exception. While we agree that the subtotals of the individual PMIA orders by product should be rolled up to the appropriate SOA disaggregation (UNE Loops Non-Design, <10 circuits, Dispatch, for example), we feel the small sample size table should be utilized in terms of the service order universes. In other words, if the service orders in the universe totaled less than 30 for UNE Loops Non-Design, <10 circuits, Dispatch, the small sample size table would be applied. BellSouth feels this would more accurately reflect the purpose of the small sample table, since the table would be utilized when the service order universe (i.e., the universe used to determine the monthly accuracy percentages) totaled 30 or below based on level of disaggregation. This ensures that the same benchmark is utilized, by level of disaggregation, across the region, and the use of the Percent Missed Installation Appointment service order totals allow for a proper by-state calculation. Recalculations will begin with March data, and all adjustments and recalculations will be posted during the October production run. Any adjustments to remedies that may result in this change in procedure will be documented, and this process will be used going forward.