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July 29, 2010

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Docket No. 2001-209-C – Application of BellSouth Telecommunications, Inc. to Provide In-Region InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996

Dear Ms. Boyd:

AT&T has recently implemented certain system changes in the Southeast region. Specifically, AT&T retired the Local Exchange Navigation System ("LENS") interface for pre-order transaction and Local Service Request ("LSR") supplements as of July 3, 2010. As a result of the retirement of LENS, this completes the migration to the Local Service Request Exchange ("LEX") System interface. Interested parties, including Competitive Local Exchange Carriers ("CLECs"), have been advised of this change through standard CLEC communications, including monthly Change Control Process ("CCP") meetings and the following Accessible Letter ("AL"): CLECSES10-038 (dated April 21, 2010). The AL is available for review at the following web site: https://clec.att.com/clec/accletters/home.cfm?curMonth=yes

Although this OSS change does not substantively change the Service Quality Measurement Plan and SEEM Administrative Plan (collectively, "SQM/SEEM Plan"), the SQM/SEEM Plan documentation must be updated to accurately reflect the retirement of the LENS interface. Accordingly, AT&T has made minor, administrative updates to the SQM/SEEM Plan documentation. For the Commission's convenience, a red-lined version of the pages of the SQM/SEEM Plan which have been updated are included in this filing. The updated SQM/SEEM Plan will be available for review at the following website: http://pmap.wholesale.att.com/content/documentation.aspx . It is important to note that from a performance measurement perspective, the migration to the LEX interface will have ***no impact*** on the calculation of the OSS measures currently contained in the SQM/SEEM Plan. That is, AT&T will continue to report system response times provided to CLECs via the SQM measure known as OSS-1 [ARI]: OSS Response Interval, and will continue to report the availability of access to the systems as part of the SQM measure known as OSS-2 [IA]: OSS Interface

Availability. The method of calculation for the OSS-1 and OSS-2 metrics will not change and the results will continue to be reported on a monthly basis.

Sincerely,

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record

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BELLSOUTH®

BellSouth Service Quality Measurement Plan (SQM)

South Carolina Performance Metrics

Measurement Descriptions
Version 2.~~06~~07

Effective Date: ~~May 29~~July 3, 2010

Note: This version (2.~~06~~07) of the South Carolina SQM complies with the order issued by the South Carolina Public Service Commission (SCPSC) in Docket No. No. 2004-316-C on March 10, 2006. The reason for this version is to reflect the OSS architecture changes implemented on ~~May 29~~July 3, 2010.

Introduction

BellSouth Service Quality Measurement Plan (SQM) describes in detail the measurements produced to evaluate the quality of service delivered to BellSouth's wholesale customers. The SQM was developed to respond to the requirements of the Communications Act of 1996 Section 251 (96 Act) which required BellSouth to provide non-discriminatory access to Competitive Local Exchange Carriers (CLEC)[1]. The reports produced by the SQM provide regulators, CLECs and BellSouth the information necessary to monitor the delivery of non-discriminatory access.

This plan results from the many divergent forces evolving from the 96 Act. This specific SQM is based on Order No. 2006-136 in SCPSC Docket No. 2004-316-C dated March 10, 2006 and modifications resulting from the implementation of OSS architecture changes on April 19, 2008, July 18, 2009, November 14, 2009, April 15, 2010, ~~and~~ May 29, 2010, and July 3, 2010.

The SQM and the reports flowing from it must change to reflect the dynamic requirements of the industry. New measurements are added as new products, systems, and processes are developed and fielded. New products and services are added as the markets develop and the processes stabilize. The measurements will be changed to reflect the dynamic changes described above and to correct errors, respond to 3rd Party audits, Orders of the SCPSC, FCC and the appropriate Courts of Law.

This document is intended for use by someone with knowledge of the telecommunications industry, information technologies and a functional knowledge of the subject areas covered by BellSouth Performance Measurements and the reports that flow from them.

Report Publication Dates

Each month, preliminary SQM reports will be posted to BellSouth's PMAP website (http://pmap.bellsouth.com) by 8:00 AM EST on the 21st day of each month or the first business day after the 21st. The validated SQM reports will be posted by 8:00 AM on the last day of the month or the first business day after the last day of the month.

For details on SEEM, please refer to the SEEM Administrative Plan.

BellSouth shall retain the performance measurement Supporting Data Files (SDF) for a period of 18 months and further retain the monthly reports produced in PMAP for a period of three years. Instructions for replicating the reports in the SQM are contained in the Supporting Data User Manual (SDUM). The SDUM is available on the PMAP website and is automatically provided with each SDF download.

Report Delivery Methods

CLEC SQM and SEEM reports will be considered delivered when posted to the website. The State/Federal Commissions have been given access to the website.

[1] *Alternative Local Exchange Companies (ALEC) and Competing Local Providers (CLP) are referred to as Competitive Local Exchange Carriers (CLEC) in this document.*

CM-5 [ION]: Notification of CLEC Interface Outages

Definition

This report measures the time it takes BellSouth to notify the CLECs of an interface outage as defined by the Change Control Process (CCP) documentation.

Exclusions

None

Business Rules

BellSouth has 15 minutes to notify the CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur:

1. BellSouth can duplicate a CLEC reported system error.
2. BellSouth finds an error message within the error log that identically matches a CLEC reported system outage.
3. When three or more CLECs report the identical type of outage.
4. BellSouth detects a problem due to the loss of functionality for users of a system.

The 15-minute interval begins once a CLEC reported outage or a BellSouth detected outage has lasted for 20 minutes and has been verified. If the outage is not verified within 20 minutes, the interval begins at the point of verification.

Calculation

Notification of CLEC Interface Outages = (a / b) X 100

- a = Number of interface outages where CLECs are notified within 15 minutes
- b = Total number of interface outages

Report Structure

- CLEC Aggregate
- Geographic Scope
  Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• By interface type for all interfaces accessed by CLECs	97% <= 15 Minutes

Interface	Applicable to
CSOTS	CLEC
~~LENS~~	~~CLEC~~
LEX	CLEC
Verigate	CLEC
XML Gateway	CLEC
EBTA	CLEC
TAFI	CLEC/BellSouth

SEEM Measure

SEEM	Tier I	Tier II
No		

G H

HDSL
High Bit Digital Subscriber Line – A dedicated digital transmission facility from BellSouth's Main Distribution Frame (MDF) to an end user's premises.

I J K

ILEC
Incumbent Local Exchange Carrier – Regional Bell Operating Company (RBOC)

INP
Interim Number Portability – When the customer is originally provided service by an ILEC and decides to change service to a CLEC, the customer may retain their ILEC telephone number. Calls to the ILEC number are rerouted to the CLEC using either the Remote Call Forwarding feature or over a dedicated trunk group from the ILEC switch to the CLEC

ISDN
Integrated Services Digital Network – An integrated digital network in which the same time-division switches and digital transmission paths are used to establish connections for different services. ISDN services include telephone, data, electronic mail, and facsmile.

L

LAN
Local Area Network – A data communications system that lies within a limited spatial area, has a specific user group, has a specific topology, and is not a public switched telecommunications network, but may be connected to one.

LASR
Local Access Service Request-Negotiation system for entry and processing of Local Service Requests.Stores all LSRs received mechanically from the CLECs. Tracks status of request and associated service orders.

LAUTO
The automatic processor in LNP Gateway that validates LSRs and issues service orders.

LCSC
Local Carrier Service Center - The BellSouth center which is dedicated to handling CLEC LSRs and preordering transactions, along with associated expedite requests and escalations.

Legacy System
Term used to refer to BellSouth Operations Support Systems.

~~**LENS**~~
~~Local Exchange Navigation System - The BellSouth application developed to provide both preordering and ordering electronic interface functions for CLECs.~~

LERG
Local Exchange Routing Guide – The official document which lists all North American Class 5 office (COs or end offices) and which describes their relationship to Class 4 office (tandem offices). Carriers use the LERG in the network design process.

LESOG
Local Exchange Service Order Generator - A BellSouth system which accepts the service order output of LASR and enters the service order into the Service Order Control System using terminal emulation technology.

LEX
Local Service Request Exchange (LEX) System – An AT&T browser based application for online creation, submittal, and maintenance of Local Service Requests (LSRs).

Appendix C: OSS InterfaceTables

OSS-1 [ARI]: OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)

Table 1: Legacy System Access Times For RNS

System	Contract	Data	Avg. Sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSACCTS	CSR	x	x
OASIS	OASISBIG	Feature/Service	x	x

Table 2: Legacy System Access Times For R0S

System	Contract	Data	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSOCSR	CSR	x	x
OASIS	OASISBIG	Feature/Service	x	x

Table 3: Legacy System Access Times For ~~LENS~~/LEX/Enhanced Verigate (Pre-Order only)

System	Contract	Data	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSECSRL	CSR	x	x
COFFI	COFFI/USOC	Feature/Service	x	x
P/SIMS	PSIMS/ORB	Feature/Service	x	x

Table 4: Legacy System Access Times For XML Gateway

System	Contract	Data	Avg. sec.	# of Calls
RSAG	RSAG-TN	Address	x	x
RSAG	RSAG-ADDR	Address	x	x
ATLAS	ATLAS-TN	TN	x	x
ATLAS	ATLAS-MLH	TN	x	x
ATLAS	ATLAS-DID	TN	x	x
DSAP	DSAP-DDI	Schedule	x	x
CRIS	CRSECSRL	CSR	x	x
P/SIMS	PSIM/ORB	Feature/Service	x	x

Table 5: Legacy System Access Times for M&R (TAFI)

System	BellSouth & CLEC	Count <= 10
CRIS	x	x
DLETH	x	x
DLR	x	x
LMOS	x	x
LMOSupd	x	x
LNP Gateway	x	x
MARCH	x	x
OSPCM	x	x
Predictor	x	x
SOCS	x	x
NIW	x	x

OSS-2 [IA]: OSS Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)

OSS Table 1: SQM Interface Availability for Pre-Ordering/Ordering

OSS Interface Availability Application	Applicable to	% Availability
~~LENS~~	~~CLEC~~	~~x~~
LEX	CLEC	x
LASR	CLEC	x
WFM	CLEC	x
OBF	CLEC	x
Enhanced Verigate	CLEC	x
LESOG	CLEC	x
XML Gateway	CLEC	x
LNP Gateway	CLEC	x
COG	CLEC	x
SGG	CLEC	x
DOE	CLEC/BellSouth	x
SONGS	CLEC/BellSouth	x
ATLAS/COFFI	CLEC/BellSouth	x
BOCRIS/CRIS	CLEC/BellSouth	x
DSAP	CLEC/BellSouth	x
RSAG	CLEC/BellSouth	x
SOCS	CLEC/BellSouth	x
LFACS	CLEC/BellSouth	x
RNS	BellSouth	x
ROS	BellSouth	x

SOUTH CAROLINA SEEM ADMINISTRATIVE PLAN

South Carolina Plan
Version 2.~~06~~07

Effective Date: ~~May 29~~July 3, 2010

Note: This SEEM Administrative Plan version is issued to reflect the OSS architecture changes implemented on ~~May 29~~July 3, 2010.

B.2 Tier 2 Submetrics

Item No.	SQM Ref	Tier 2 Submetric
1	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) ~~– LENS/~~Enhanced Verigate
2	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) – LEX
3	ARI	OSS-1 OSS Response Interval (Pre-Ordering/Ordering) –XML Gateway
4	ARI	OSS-1 OSS Response Interval (Maintenance & Repair)
5	IA	OSS-2 OSS Interface Availability – (Pre-Ordering/Ordering) – Regional per OSS Interface
6	IA	OSS-2 OSS Interface Availability – (Maintenance & Repair) – Regional per OSS Interface
7	LMT	PO-2 Loop Makeup – Response Time – Electronic – Loop
8	AKC	O-2 Acknowledgement Message Completeness – Acknowledgments
9	FT	O-3 Percent Flow-Through Service Requests – Business
10	FT	O-3 Percent Flow-Through Service Requests – LNP
11	FT	O-3 Percent Flow-Through Service Requests – Residence
12	FT	O-3 Percent Flow-Through Service Requests – UNE-L (includes UNE-L with LNP)
13	RI	O-8 Reject Interval – Fully Mechanized
14	RI	O-8 Reject Interval – Partially Mechanized
15	RI	O-8 Reject Interval – Non Mechanized
16	FOCT	O-9 Firm Order Confirmation Timeliness – Fully Mechanized
17	FOCT	O-9 Firm Order Confirmation Timeliness – Partially Mechanized
18	FOCT	O-9 Firm Order Confirmation Timeliness – Non Mechanized
19	FOCT	O-9 Firm Order Confirmation Timeliness – Local Interconnection Trunks
20	FOCC	O-11 FOC & Reject Response Completeness – Fully Mechanized
21	FOCC	O-11 FOC & Reject Response Completeness – Partially Mechanized
22	FOCC	O-11 FOC & Reject Response Completeness – Non Mechanized
23	OAAT	O-12 Average Answer Time – Ordering Centers – CLEC Local Carrier Service Center

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T") and that she has caused AT&T South Carolina's Updated SQM/SEEM Plans in Docket No. 2001-209-C to be served upon the following on July 29, 2010:

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