OBSERVATION REPORT #22

KPMG Consulting received late Local Service Request Local Responses (LSRLRs) on Non-Flow-Through POTS orders with less than six lines.

Issue

According to the order confirmation timeliness metric (OR-1-04), for all POTS orders with less than six lines, CLECs should receive 95% of LSRLRs within 24 hours of order submission.

As of June 19, 2001, KPMG Consulting received 115 LSRLRs on Non-Flow-Through POTS with 87.8% arriving within 24 hours. Exhibit 1 depicts the distribution of LSRLRs by receipt time and Exhibit 2 provides specific examples of late LSRLRs.

Local Service Request Local Response Timeliness 100 110 95 100 90 90 85 Number of LSRLR(s 80 80 70 60 75 50 70 40 65 30 60 20 55 10 0 On Time Less than 5 hrs 5-15 hrs Late 15-50 hrs Late 50-100 hrs Late Late Response Received (in hours) LSRLR Received Cumulative % ----- Standard (95%)

Exhibit 1: Distribution of Local Service Request Local Responses

This observation report is for discussion purposes only and is subject to change without notice

¹ Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports, dated August 11, 2000.

Exhibit 2: Examples of Purchase Order Numbers (PON) that exceed the OR-1-03 Standard

| Item | PON & VER | LSR Sent | LSRLR Received | LSRLR Response Time (hours) ² | Exceeded C2C Guidelines by (hours) |
|------|---------------------|-------------------|-------------------|--|--|
| 1 | 006041TE0X000001*BA | 05/08/01 18:04:30 | 05/10/01 14:12:04 | 44.126 | 20.126 |
| 2 | 019021TE0X000001*AC | 05/09/01 15:12:51 | 05/11/01 17:58:28 | 50.760 | 26.760 |
| 3 | 019021TE0X000002*AA | 05/10/01 14:50:18 | 05/14/01 15:42:41 | 34.873 | 10.873 |
| 4 | 006041TE0X000002*BA | 05/10/01 17:12:46 | 05/14/01 14:11:55 | 30.986 | 6.986 |
| 5 | 006041TE0X000003*BB | 05/11/01 13:13:04 | 05/15/01 11:05:55 | 31.881 | 7.881 |
| 6 | 006041TE0X000004*BA | 05/14/01 11:38:33 | 05/15/01 13:36:52 | 25.972 | 1.972 |
| 7 | 013999TE0X010001*AB | 05/15/01 12:02:03 | 05/16/01 16:31:33 | 28.492 | 4.492 |
| 8 | 016121TE0X000002*AA | 05/16/01 17:17:11 | 05/22/01 06:18:17 | 71.018 | 47.018 |
| 9 | 013041TE0X000004*BA | 05/23/01 11:31:59 | 05/24/01 14:28:08 | 26.936 | 2.936 |
| 10 | 080011TE0X000004*AE | 05/31/01 13:20:33 | 06/01/01 13:23:03 | 24.042 | 0.042 |
| 11 | 056011TE0X000001*AE | 06/04/01 11:01:25 | 06/05/01 12:32:51 | 25.524 | 1.524 |
| 12 | 080011TE0X000003*AD | 06/04/01 16:57:17 | 06/11/01 16:05:01 | 105.129 | 81.129 |
| 13 | 079021TE0X000003*AC | 06/04/01 18:07:58 | 06/12/01 18:30:49 | 130.381 | 106.381 |
| 14 | 079021TE0X000002*AD | 06/12/01 15:45:41 | 06/13/01 15:55:55 | 24.171 | 0.171 |

Assessment

Without timely order confirmations, CLECs cannot provide accurate due dates to their customers.

² Service Order Processor (SOP) downtime was considered when calculating response timeliness.