

State of Florida



Public Service Commission
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DATE: MARCH 21, 2002

TO: DIRECTOR, DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES (BAYÓ)

FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (BROUSSARD, *EBB*)
Rut WALLACE, VINSON, HARVEY *W*
OFFICE OF THE GENERAL COUNSEL (KEATING) *TK*

RE: DOCKET NO. 960786B-TL - CONSIDERATION OF BELLSOUTH
TELECOMMUNICATIONS, INC.'S ENTRY INTO INTERLATA SERVICES
PURSUANT TO SECTION 271 OF THE FEDERAL TELECOMMUNICATIONS
ACT OF 1996. (THIRD PARTY OSS TESTING)

DOCKET NO. 981834-TP - PETITION OF COMPETITIVE CARRIERS
FOR COMMISSION ACTION TO SUPPORT LOCAL COMPETITION IN
BELLSOUTH TELECOMMUNICATIONS, INC.'S SERVICE TERRITORY.

AGENDA: 04/02/02 - REGULAR AGENDA - INTERESTED PERSONS MAY
PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: THESE DOCKETS ARE CONSOLIDATED FOR PURPOSES
OF OSS TESTING. ALTHOUGH A PANEL IS
ASSIGNED TO DOCKET NO. 981834-TP, THE FULL
COMMISSION SHOULD VOTE ON THE ISSUES HEREIN
BECAUSE THE DOCKETS HAVE BEEN CONSOLIDATED
FOR THIS PURPOSE.

FILE NAME AND LOCATION: S:\PSC\CMP\WP\960786F.RCM

CASE BACKGROUND

On December 10, 1998, the Florida Competitive Carriers
Association (FCCA), the Telecommunications Resellers, Inc. (TRA),
AT&T Communications of the Southern States, Inc. (AT&T), MCI metro
Access Transmission Services, LLC (MCI metro), Worldcom
Technologies, Inc. (Worldcom), the Competitive Telecommunications

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Association (Comptel), MGC Communications, Inc. (MGC), and Intermedia Communications Inc. (Intermedia) (collectively, "Competitive Carriers") filed their Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory.

On December 30, 1998, BellSouth Telecommunications, Inc. (BellSouth) filed a Motion to Dismiss the Petition of the Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. BellSouth requested that the Commission dismiss the Competitive Carriers' Petition with prejudice. On January 11, 1999, the Competitive Carriers filed their Response in Opposition to BellSouth's Motion to Dismiss. By Order No. PSC-99-0769-FOF-TP, issued April 21, 1999, the Commission denied BellSouth's Motion to Dismiss. In addition, the Commission denied the Competitive Carriers' request to initiate a rulemaking proceeding to establish expedited dispute resolution procedures for resolving interconnection agreement disputes. The Commission also directed staff to provide more specific information and rationale for its recommendation on the remainder of the Competitive Carriers' Petition.

On May 26, 1999, the Commission issued Order No. PSC-99-1078-PCO-TP, which granted, in part, and denied, in part, the petition of the Florida Competitive Carriers' Association to support local competition in BellSouth's service territory. Specifically, the Commission established a formal administrative hearing process to address unbundled network elements (UNE) pricing, including UNE combinations and deaveraged pricing of unbundled loops. The Commission also ordered that Commissioner and staff workshops on Operations Support Systems (OSS) be conducted concomitantly in an effort to resolve OSS operational issues. The Commission stated that the request for third-party testing (TPT) of OSS was to be addressed in these workshops. These workshops were held on May 5-6, 1999. The Commission also ordered a formal administrative hearing to address collocation and access to loop issues, as well as costing and pricing issues.

On May 28, 1999, FCCA and AT&T filed a Motion for Independent Third-Party Testing of BellSouth's OSS. BellSouth filed its Response to this Motion by the FCCA and AT&T on June 16, 1999. That same day, FCCA and AT&T filed a Supplement to the Motion for Third-Party Testing. On June 17, 1999, ACI Corp. (ACI) filed a Motion to Expand the Scope of Independent Third-Party Testing. On

June 28, 1999, BellSouth responded to the Supplement filed by FCCA and AT&T. On June 29, 1999, BellSouth responded to ACI's Motion to Expand the Scope of Independent Third-Party Testing. By Order No. PSC-99-1568-PAA-TP, issued August 9, 1999, the Commission denied the motion. Upon its own motion, the Commission approved staff's recommendation to proceed with Phase I of third-party testing of BellSouth's OSS. Phase I of third-party testing required a third party, in this case KPMG Consulting LLC, to develop a Master Test Plan (MTP) that would identify the specific testing activities necessary to demonstrate nondiscriminatory access and parity of BellSouth's systems and processes.

By Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, the Commission approved the KPMG MTP and initiated Phase II of third-party testing of BellSouth's OSS. On February 8, 2000, by Order No. PSC-00-0260-PAA-TP, the Commission approved interim performance metrics to be used during the course of testing to assess the level of service BellSouth is providing to ALECs. By Order No. PSC-00-0563-PAA-TP, issued March 20, 2000, the Commission approved the retail analogs/benchmarks and the statistical methodology that should be used during the OSS third-party testing.

By Order No. PSC-00-2451-PAA-TP, issued December 20, 2000, the Commission approved revised interim performance metrics, benchmarks and retail analogs to be used during the third-party OSS testing. The revised interim metrics were ordered to address several changes made to BellSouth's initial set of interim metrics approved by Order No. PSC-00-0260-PAA-TP. The revised interim metrics included corrections to the business rules used to calculate the metrics and additional levels of detail allowing the metrics to capture BellSouth's performance on newer services such as Local Number Portability (LNP). Since Order No. PSC-00-2451-PAA-TP, BellSouth has issued additional changes to its revised interim metrics in other jurisdictions. By Order No. PSC-01-1428-PAA-TL, issued July 3, 2001, the Commission approved additional changes to update metrics and retail analogs and provide additional levels of disaggregation.

On March 7, 2002, BellSouth sent a letter notifying the Commission and KPMG Consulting that BellSouth was retiring its RoboTAG interface and requesting it be removed from the scope of operational support system testing. BellSouth's letter also stated it was working with the five CLECs who use the RoboTAG interface and provided them with transition options.

JURISDICTION

Section 271(a) of the Telecommunication Act of 1996 (Act) provides that a Regional Bell Operating Company (RBOC) may not provide interLATA services except as provided in Section 271. Section 271(d) of the Act provides, in part, that prior to making a determination under Section 271, the Federal Communications Commission (FCC) shall consult with the State commission of any State that is the subject of a Section 271 application in order to verify the compliance of the RBOC with requirements of Section 271(c). In addition, Section 120.80(13)(d), Florida Statutes, provides that the Commission can employ processes and procedures as necessary in implementing the Act. Therefore, this Commission has jurisdiction in evaluating BellSouth's OSS through third-party testing, which will enable it to consult with the FCC when BellSouth requests 271 approval from the FCC.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission-approved OSS Master Test Plan be revised to omit the planned testing of BellSouth's RoboTAG ordering interface?

RECOMMENDATION: Yes, the Master Test Plan (MTP) should be revised to omit planned testing of the RoboTAG ordering interface. In keeping with the Commission's expressed intention of testing all BellSouth Operating Support Systems offered for use by CLECs, it is no longer relevant to conduct the RoboTAG-related testing elements of the MTP.

STAFF ANALYSIS: On March 19, 2002, BellSouth Interconnection Services issued Carrier Notification Letter SN91082941 providing formal notice to CLECs that it would no longer enter into new contracts for the use of RoboTAG. The Carrier Notification Letter also stated that BellSouth has developed migration options for CLECs currently using RoboTAG. BellSouth also states in the letter that it will transition toward retirement of the RoboTAG graphical

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user interface (GUI) software in accordance with existing interconnection agreements of those CLECs using it.

Staff notes that BellSouth continues to offer the core TAG functionality that RoboTAG utilized, as well as both the EDI and LENS interfaces for CLEC ordering. Presently, the vast majority of electronic CLEC orders are placed through these systems. These three ordering interfaces are being thoroughly tested, as required by the Master Test Plan.

Prior to BellSouth's decision, RoboTAG had provided CLECs with a low-cost, off-the-shelf option for interfacing with the TAG ordering system. While the Telcom Act does not specifically address the cost issue, Staff notes that BellSouth's internet-based LENS system still provides a low-cost option for CLEC ordering.

According to BellSouth, five CLECs presently use RoboTAG, generating approximately 7,000 local service orders (LSRs) per month. In comparison, BellSouth processes a combined monthly total of approximately 450,000 mechanized LSRs from all interface types. According to BellSouth's March 19, 2002 announcement, RoboTAG will continue to be offered to CLECs by an arrangement with outside service providers. Therefore, the change proposed by BellSouth should not cause undue disruption to the five affected CLECs.

Therefore the Master Test Plan should be revised to omit planned testing of the RoboTAG ordering interface. In keeping with the Commission's expressed intention of testing all BellSouth Operating Support Systems offered for use by CLECs, it is no longer relevant to conduct the RoboTAG-related testing elements of the MTP.

ISSUE 2: Should this docket be closed?

RECOMMENDATION: No. This docket should remain open to complete OSS testing in accordance with the revised MTP.

STAFF ANALYSIS: This docket should remain open to complete OSS testing in accordance with the revised MTP.