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October 21, 2003

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC, DIECA Communications, Inc. d/b/a Covad Communications Company, ITC^DeltaCom Communications, Inc., and MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. are an original and fifteen copies of CLEC Coalition Response to BellSouth Proposal for SQM Reports in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,


Floyd R. Self

FRS/amb
Enclosures
cc: Parties of Record

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FPSC-COMMUNICATIONS CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)
of Operations Support System Permanent)
Performance Measures for Incumbent)
Local Exchange Telecommunications)
Companies (BellSouth Track)
_____)

Docket No. 000121A-TP
Filed: October 21, 2003

CLEC COALITION RESPONSE TO BELLSOUTH’S PROPOSAL FOR SQM REPORTS

The Competitive Local Exchange Carrier (“CLEC”) Coalition¹ hereby files its Response to the BellSouth Telecommunications, Inc. (“BellSouth”) proposal attached to Staff’s Memorandum dated October 9, 2003.² This Response addresses BellSouth’s proposed replacement reporting and CLEC concerns about those changes.

I. INTRODUCTION

While the CLEC Coalition supports BellSouth’s general direction of changing the format of reports, there are concerns in two areas: (1) change determinations that are not in compliance with previous reporting should not be made; and (2) the industry must validate any change determinations. The information contained in the BellSouth proposal is insufficient to validate that all the information represented in the current SQM reporting will be contained in the modified reporting proposed by BellSouth.

¹ For purposes of these comments, the CLEC Coalition consists of AT&T Communications of the Southern States, LLC, (“AT&T”), DIECA Communications, Inc. d/b/a Covad Communications Company (“Covad”), ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom (“ITC^DeltaCom”), and MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively “MCI”).

² Staff Memorandum, Florida Public Service Commission, Docket 000121A, October 9, 2003. The Response of the CLEC Coalition is directed to the “BellSouth Performance Measurements – Replacement of current Reporting with Single Report Structure” proposal, hereinafter referred to as “BellSouth proposal”, attached to the Staff Memorandum.

II. CLECS ARE UNABLE TO VALIDATE THAT THE CONTENT OF THE PROPOSED REPORTS WILL MATCH THAT OF THE CURRENT SQM REPORTS.

The position of the CLEC Coalition is that the currently reported information must also be in the newly formatted reports proposed by BellSouth. It is doubtful, however, that all current SQM reports, such as Percent Flow Through Service Requests (Aggregate Detail), can be migrated to the new format unless essential information is omitted. This is because the information objectives and content of some reports are too detailed to be migrated to a Monthly State Summary ("MSS") format. In order to validate that the proposed change is appropriate, BellSouth must provide copies of the newly formatted reports and current reports for the same performance period for a period of time, e.g., three months. Without this, neither the Commission nor the CLECs have sufficient documentation to review and concur with BellSouth's proposal. CLECs want to ensure that the currently reported information is captured completely and represented in some form on the newly formatted reports proposed by BellSouth. During the Georgia PMAP Notification Conference Call on October 7, 2003 ("October 7 Notification Call"), BellSouth expressed its opposition to dual reporting in each of the different formats for a reporting period.

III. PARITY CALCULATIONS SHOULD BE BASED ON THE STATE ORDERED SELF-EFFECTUATING ENFORCEMENT MECHANISM ("SEEM") METHODOLOGY FOR DETERMINING COMPLIANCE.

BellSouth states that an advantage of its proposal is "[p]arity calculations will be based on the state ordered SQM rather than the April 6, 2001 Georgia SQM." BellSouth proposal at p. 4. Given that this presentation was given in the context of a Georgia proceeding, the CLEC Coalition assumes this statement is not applicable in Florida. CLECs are not aware of any current parity calculations specified in the "state ordered SQM". The CLEC Coalition, however, suggests that the parity calculation methodology in the Florida Performance Assurance Plan

("PAP") should be used. There has not been any parity methodology ordered after the methodology ordered in the SEEM portion of the PAP. The only other parity calculation ordered on an interim basis³ was for the purposes of the Florida Third Party Test because the Performance Measurement workshops, established to determine a parity methodology, were in progress at that time.

IV. PARITY DETERMINATIONS AND Z SCORES SHOULD NOT BE OMITTED FROM THE REPORTS.

The existing MSS reports currently specify a Pass/Fail or compliance indication and a Z-score. This information is missing from the BellSouth proposed reports, with no explanation given for the omission. As stated previously, the Pass/Fail indication should be based on the parity calculation specified in the SEEM portion of the PAP. Likewise, if included, the Z-score column should reflect the value of the Truncated Z. If BellSouth retains both the Pass/Fail indication and the Z value and includes the Balancing Critical Value, the CLECs would have the level of information necessary to assess the degree of non-compliance. It is essential that this Commission direct BellSouth to retain this information in the proposed reformatted reports.

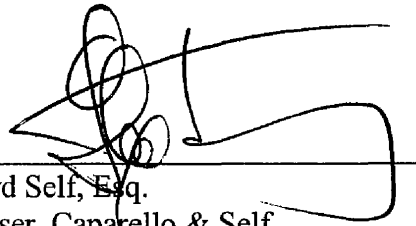
V. CONCLUSION

BellSouth must submit a complete proposal for any proposed changes, providing sufficient information and documentation so that this Commission and interested parties can evaluate the proposal and determine whether it is acceptable. Because BellSouth gave merely an abbreviated description in the October Notification Report and a brief presentation and handout during the October 7 Notification call, CLECs remain unclear concerning the potential impacts of the proposed changes on each of the SQM reports. BellSouth has not revealed what

³ "Notice of Proposed Agency Action Order To Approve Retail Analogs, Benchmarks and Statistical Methodology", Florida Public Service Commission, Dockets 981834-TP and 980786-TL, March 20, 2000. An interim statistical methodology was ordered specifically for the Florida Third Party Test.

reports or report content, if any, will be missing in the new format. CLECs believe there must be visible evidence that all existing reports and report content will be transitioned to, and represented in, the proposed new format. Ideally, having both the current reports and the newly formatted reports would facilitate an expeditious and productive workshop, whether at the October 24 workshop or any other meeting convened by this Commission.

Respectfully submitted this 21st day of October, 2003.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following parties by Hand Delivery (*) and/or U.S. Mail this 21st day of October, 2003.

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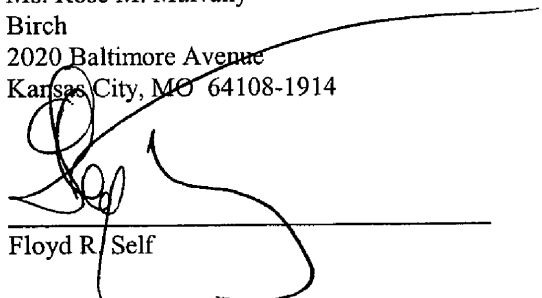
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