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October 14, 2004

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 000121A-TP**  
**In Re: Investigation into the establishment of operations support  
systems permanent incumbent local exchange Telecommunications  
companies**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Action Item Responses to the Workshop, which we ask that you file in the captioned docket. A copy of the same is being provided to all parties as reflected in the attached certificate of service.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record  
Marshall M. Criser, III  
Nancy B. White  
R. Douglas Lackey

**CERTIFICATE OF SERVICE**  
**Docket No. 000121A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 14th day of October, 2004 to the following:

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Robert A. Culpepper

**(+) Signed Protective  
Agreement**

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BellSouth Telecommunications, Inc.  
FPSC Dkt No. 000121A-TP  
Responses to 9/23/2004 Workshop  
Action Items  
October 14, 2004  
Item No 1  
Page 1 of 1

**REQUEST:** BellSouth to provide the website address for BellSouth Billing information available to the CLECs.

**RESPONSE:** The website link available to the CLECs is:

<http://interconnection.bellsouth.com/guides/html/billing.html>

This site provides current BellSouth billing information including such publications as Understanding Your Bill, the BellSouth CLEC Billing Guide, and the Billing Dispute Resolution Guide.

**RESPONSE PROVIDED BY:** AI Varner

**REQUEST:** BellSouth is to provide a list of the parity measures where BellSouth does not use truncated Z in SEEMs.

**RESPONSE:** BellSouth does not use truncated Z in SEEMs for the following parity measures. For these measures parity is determined by simply comparing the performance level for CLECs to the retail analog.

OSS Average Response Time & Response Interval  
Billing Invoice Accuracy  
Billing Invoice Timeliness  
Usage Data Delivery Accuracy  
Mean Time To Notify CLEC of Network Outages  
Speed of Answer

**RESPONSE PROVIDED BY:** AI Varner

BellSouth Telecommunications, Inc.  
FPSC Dkt No. 000121A-TP  
Responses to 9/23/2004 Workshop  
Action Items  
October 14, 2004  
Item No 3  
Page 1 of 1

REQUEST: How is back-billing accounted for in the Billing measurements?  
Is it counted as an adjustment in B-1, BIA: Invoice Accuracy?

RESPONSE: Back-billing associated with billing errors is included as an  
adjustment in B-1: Invoice Accuracy.

RESPONSE PROVIDED BY: Al Varner

**REQUEST:** For the measurement B-2, BIT: Mean Time to Deliver Invoices, BellSouth is to provide revised SQM Disaggregation – Analog/Benchmark reflecting both CRIS and CABS for UNEs.

**RESPONSE:** BellSouth proposes to clarify the disaggregation proposed in this measure, B-2: Mean Time to Deliver Invoices, to show that UNEs billed from CRIS are compared to Retail CRIS, Resale billed from CRIS is compared to Retail CRIS, and Interconnection / UNES billed from CABS are compared to Retail CABS. BellSouth cannot distinguish between Interconnection and UNES in CABS. BellSouth also proposes, for clarity, to make the same wording changes to the SQM level of disaggregation to B-1, Invoice Accuracy.

The SQM will be modified as follows:

SQM Level of Disaggregation	SQM Analog / Benchmark
Resale CRIS.....	<u>Retail CRIS</u>
UNE CRIS .....	<u>Retail CRIS</u>
Interconnection / <u>UNE CABS</u> .....	<u>Retail CABS</u>

**RESPONSE PROVIDED BY:** Al Varner



**REQUEST:** For the measurement B-10, Percent Billing Errors Corrected in "X" Business Days, does the Automated Claims Adjustments Tracking System (ACATS) and Billing Disputes Activity System (BDATS) capture the date a dispute is received? Is the date on the dispute the date received or the date entered into ACATS or BDATS?

**RESPONSE:** ACATS and BDATS do capture the date the dispute was received for this measure. The date the Billing Adjustment Request (BAR) form is received is input into the system as the date the dispute is received.

**RESPONSE PROVIDED BY:** Al Varner

BellSouth Telecommunications, Inc.  
FPSC Dkt No. 000121A-TP  
Responses to 9/23/2004 Workshop  
Action Items  
October 14, 2004  
Item No 6  
Page 1 of 1

**REQUEST:** During the 9/23/2004 FL SQM workshop review of CM-3:  
Timeliness of Documentation Associated with Change, Staff  
requested reasons for the proposed change to the exclusion  
“reasons outside of BellSouth’s control”, other than changes due to  
Regulatory mandate.

**RESPONSE:** In accordance with the current CCP, there are no other reasons  
outside of BellSouth’s control.

**RESPONSE PROVIDED BY:** Al Varner

**REQUEST:** In the 9/23/2004 FL SQM workshop BellSouth proposed changes to the calculation from "submitted" to "responded to within" for both the measurements CM-7: Percentage of Change Requests Accepted or Rejected within 10 days and CM-8: Percent Change Requests Rejected. BellSouth is to propose alternative language for the calculation.

**RESPONSE:** BellSouth proposes the following alternative language for the calculation for CM-7: Percentage of Change Requests Accepted or Rejected within 10 days.

Percentage of Change Requests Accepted or Rejected within 10 Business Days = (a / b) X 100

a = Total number of change request responses due in the reporting period that were accepted or rejected within 10 business days

b = Total number of change request due in submitted ~~responded to~~ within the reporting period

**BellSouth proposes the following alternative language for the calculation for CM-8: Percent Change Requests Rejected:**

Percent Change Requests Rejected = (a / b) X 100

a = Total number of change requests rejected in the reporting period

b = Total number of change requests submitted ~~responded to~~ within the reporting period

**RESPONSE PROVIDED BY:** Al Varner

REQUEST: In the 9/23/2004 FL SQM workshop BellSouth proposed to modify the calculation for CM-11: Percentage of Change Requests Implemented with 60 Weeks of Prioritization.

BellSouth is to provide:

- 1) Rationale for the proposed change to the calculation; and
- 2) BellSouth to propose language which defines when the clock starts after reprioritization.

RESPONSE: 1) Based on future projections, there will be only 3 to 4 production releases for 2005 due to process, capacity, and resource limitations. This production schedule provides adequate time for development and testing and avoids unnecessary and potentially problematic 'churn' in the software and OSS systems of BellSouth and the CLECs. The measure, as it is today, penalizes BellSouth for failures in months when there is no possibility of implementing a request until the next production release. Under the current calculation methodology, this means there would be 2 to 3 months when the measurement would result in a miss, simply due to the fact that a production release is not scheduled.

Measuring the requests as they are implemented would align the measurement with the process being measured. For those months when there is no production release, the measurement would be reported with 'no data.'

### **Proposed CM-11**

#### **Calculation**

**Percent of Type 5 CLEC initiated Change Requests implemented on time = (a / b) X 100**

a = Total number of prioritized Type 5 Change Requests implemented each month within the monthly reporting period that are less than or equal to 60 weeks of age from the date of their first prioritization plus all other prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization.

BellSouth Telecommunications, Inc.  
FPSC Dkt No. 000121A-TP  
Responses to 9/23/2004 Workshop  
Action Items  
October 14, 2004  
Item No 8  
Page 2 of 2

~~b = All entries in "a" above plus all prioritized Type 5 Change Requests prioritized more than 60 weeks before the end of~~ implemented within the monthly reporting period.

**Percent of Type 4 BellSouth initiated Change Requests implemented on time = (a / b) X 100**

~~a = Total number of prioritized Type 4 Change Requests implemented each month within the monthly reporting period that are less than or equal to 60 weeks of age from the date of their first prioritization plus all other prioritized change requests existing at the end of the month that are less than or equal to 60 weeks of age from prioritization.~~

~~b = All entries in "a" above plus all prioritized Type 4 Change Requests prioritized more than 60 weeks before the end of~~ implemented within the monthly reporting period.

2) BellSouth proposes to add a sentence to the proposed business rule to clarify when the clock starts after reprioritization.

In BellSouth's July 28, 2004 SQM filing, the following red-line business rule was proposed:

~~This metric is designed to measure BellSouth's monthly performance in implementing prioritized change requests. The clock starts interval when a for each change request begins when it has first been prioritized as described in the Change Control Process, and ends The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this monthly measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.~~

BellSouth proposes that the following sentence be added:  
For reprioritization requested by the CLECs, the 60 week interval starts from the date of reprioritization.

RESPONSE PROVIDED BY: Al Varner