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ORIGINAL

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 Sent: Monday, December 27, 2004 12:37 PM
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 Subject: RE: 000121A -- CLEC Comments: Corrective Filing



Corrected
Comments on

Docket No. 000121A-TP -- In re: Investigation into the
 Establishment of Operations Support system Permanent Performance
 Measures for Incumbent Local Exchange Telecommunications Companies
 (BellSouth track)

Attached for electronic filing are the CLEC Coalition's Comments on BellSouth's Proposed PMAP Changes to be filed in the above-referenced docket.. This filing is made to correct the December 21, 2004 filing and provide the omitted attachment. The cover letter, certificate of service and the CLEC Coalition's Comments are a total of 19 pages. The attached document should be considered the official version for purposes of the docket file.

As indicated in the cover letter, copies are being distributed to parties via electronic (in cases where e-mail addresses are available) and U.S. Mail. Thank you for your assistance in this matter.

<<Corrected CLEC Comments on Proposed PMAP Change.pdf>>

>
 >
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DOCUMENT NUMBER-DA
 13503 DEC 27
 FPSC-COMMISSION CLE

ORIGINAL



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December 27, 2004

BY ELECTRONIC FILING

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

On December 21, the CLEC Coalition filed Comments on BellSouth's Preliminary Notification for February 2005 PMAP Changes. An attachment referenced in the CLEC Comments was inadvertently omitted. We are re-submitting CLEC Comments which include the referenced attachment. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/scd
Attachment
cc: Parties of Record

DOCUMENT NUMBER-DATE

13503 DEC 27 04

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the CLEC's Reply was served by

U.S. Mail this 27th day of December 2004 to the following:

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s/ Tracy W. Hatch
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)
of Operations Support System Permanent) Docket No. 000121A-TP
Performance Measures for Incumbent)
Local Exchange Telecommunications) Filed: December 27, 2004
Companies (BellSouth Track))

**CLEC COALITION COMMENTS ON
BELLSOUTH'S PRELIMINARY NOTIFICATION
FOR FEBRUARY, 2005 PMAP CHANGES**

The Competitive Local Exchange Carriers ("CLECs"), AT&T Communications of the Southern States, LLC; Birch Telecom; DIECA Communications Company d/b/a Covad Communications Company ("Covad"); ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom/BTT"); MCImetro Access Transmission Services, LLC, and Network Telephone Corp., hereinafter collectively referred to as the "CLEC Coalition," hereby file the following comments in response to BellSouth's Proposed Notification Report for the January 2005 data month and Preliminary Notification Report for the data month of February 2005. Those reports are dated December 1, 2004 and are included as Attachment 1. The CLEC Coalition comments specifically on BellSouth's Preliminary February 2005 Data Notification, Item 4. This item, among others, was discussed during an industry conference call on December 7, 2004.¹

I. FEBRUARY PRELIMINARY CHANGES

Item 4 states "Where a CLEC enters into an agreement(s) with BellSouth for services not subject to the SQM plan, such services should not be reflected in the SQM data in accordance

¹ A member the Florida Public Service Commission attended this call.

with the parties' agreement (s). BellSouth will implement coding changes to effect this change." Further, during the December 7, 2004 conference call reviewing proposed changes to PMAP, BellSouth stated that unless services are required under 251, they are not subject to the SQM.

CLECs strongly disagree with BellSouth's position that it can unilaterally decide which processes and services are subject to the SQM plan, and therefore which performance results are to be reported. BellSouth's SQM and SEEM reporting requirements are clearly established by Order of this Commission, and can only be changed by subsequent Order of this Commission. If BellSouth wishes to make a change in its reporting requirements, it may either file comments in a Commission initiated SQM review, or petition the Commission to establish such a review. As this Commission (and BellSouth) is well aware, this issue is currently a disputed, open item in the current SQM and SEEM review, with comments by the parties filed in this docket on December 6, 2004. Therefore, BellSouth's inappropriate proposal to proceed with implementation in advance of a decision by this Commission should be rejected.

Respectfully submitted this 27th day of December, 2004.

CLEC COALITION

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December 1, 2004

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Proposed Notification Report for the January 2005 data month and a Preliminary Notification Report for the data month of February 2005. These proposed changes will be discussed at the December 7, 2004 industry conference call.

In its October 2004 Data Notification filed on September 1, 2004, BellSouth provided notice of mechanizing the LNP Measures (Item No. 4). Although BellSouth expected to make this change with October 2004 data, it will be implemented with November 2004 data instead.

Enclosed herein, please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

Yours very truly,

Lisa S. Foshee

LSF:nvd
Enclosures

Mr. Reece McAlister
December 1, 2004
Page Two

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)
Mr. Patrick Reinhardt (w/enclosure) (via electronic mail)
Parties of Record (w/enclösure) (via electronic mail)

561065/561061/561063

PROPOSED JANUARY 2005 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the January 2005 data month. Results for the January 2005 data month will be posted as follows:

Preliminary results February 21, 2005
Final results February 28, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. BellSouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Pre-Ordering Measurements

(1) *Affected Measures:* OSS-2 & OSS-3

Description of Change: Currently, there is a problem with the way the raw data is displayed for these measures. The records in the raw data are listed by instances of unique availability results instead of unique server. As an example, for OSS-2 for the July data month and the BOCRIS/CRIS application, the twelve servers that have this application loaded were included in the report. Eleven of these servers had 100% availability and one of them had 99.97% availability. The raw data showed two records, one with 100% and one with 99.97%. The reports were correct and complete. BellSouth proposes to correct this problem to display all the servers in the raw data. This proposed change was Item (1) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5804)

Impact of Change: None to reported results.

Provisioning Measurements

- (2) *Affected Measures:* P-7, P-7A, P-7B & P-7C

Description of Change: Currently, BellSouth is omitting Unbundled Copper Loop Coordinated Orders from these measures. BellSouth proposes to include Unbundled Copper Loop Coordinated Orders in the Hot Cut measures. (RQ4104)

Impact of Change: There was no volume change to the data from January 2004 to September 2004

- (3) *Affected Measures:* P-7C

Description of Change: Currently, Bellsouth is omitting Unbundled Copper Loop Non-Coordinated Orders from this measure. BellSouth proposes to include Unbundled Copper Loop Non-Coordinated Orders in this measure. (RQ4105)

Impact of Change: From January 2004 to September 2004, in Georgia, the implementation of this change would have caused an overall increase of 0.02% in the results.

- (4) *Affected Measures:* P-9

Description of Change: Currently, the Access Carrier Name Abbreviation (ACNA) codes in the supporting data files are being directly populated from the Service Order Fact table. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to more accurately assign the Service Order ownership for Local Interoffice Trunks in the supporting data files. This proposed change was Item (2) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5545)

Impact of Change: None to reported results.

- (5) *Affected Measures:* P-4 & P-4A

Description of Change: Instead of using denial and restoral orders to manage customer non-payment situations, some CLECs issue an order for new service followed by a disconnect order for this purpose. Because service is already working at the location, the order for new service is a request for an additional line and is therefore identified as requiring dispatch of a technician to complete the order. BellSouth has been monitoring these orders, manually stopping the dispatch and assigning them an "L" appointment code because the now non-dispatch order has the longer dispatch installation interval due to the way the CLEC used this process. BellSouth proposes to mechanize this "L" code assignment to avoid errors resulting from the manual process using the same criteria

currently used to assign the code manually. This proposed change was Item (3) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5786)

Impact of Change: For May 2004, in Georgia, 328 orders would be excluded from the data. The interval for OCI would be reduced by .04 days.

- (6) *Affected Measures:* P-13D (Florida, Georgia, Kentucky, Louisiana, North Carolina, and Tennessee)

Description of Change: Currently, one of the Non-Wireless LNP filters is inappropriately applied causing some ELMS6 submitted records to be excluded from this measure. BellSouth proposes to update the code to appropriately apply this filter to these records. This proposed change was Item (4) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5918)

Impact of Change: For July 2004, in Florida, the results would have dropped from 92.20% to 84.12%. In the Region, the results would have increased from 72.24% to 76.37%.

M&R Measurements

- (7) *Affected Measures:* MR-1, MR-2, MR-3 & MR-4

Description of Change: Currently, the Operating Company Name (OCN) codes in the supporting data files are being directly populated from the Trouble Ticket tables. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to assign the ticket ownership in the supporting data files, as in the case of line splitting/line sharing (dual ownership). This proposed change was Item (5) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5523)

Impact of Change: None to the reported data.

- (8) *Affected Measures:* MR-2

Description of Change: Currently, PMAP uses the RESH code to identify the CLEC to which a line is assigned. The RESH code format for resold services should be an "R" followed by the CLECs Operating Company Name (OCN). In some cases, the character is not present on ISDN lines and the record is assigned to an error file because PMAP cannot identify the CLEC. BellSouth proposes to change PMAP to accept either an "R" or a blank as the first character in these situations so that the record will be assigned to the proper CLEC. This proposed change was Item (6) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5743)

Impact of Change: For August 2004, in the BellSouth Region, approximately 200 lines would be added to the resale ISDN line count which would account for a decrease in CTRR of .07%.

561060

PRELIMINARY FEBRUARY 2005 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the February 2005 data month. Results for the February 2005 data month will be posted as follows:

Preliminary results March 21, 2005
Final results March 31, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) *Affected Measures:* OSS-1

Description of Change: Currently, PMAP is counting test transaction for LENS and EDI in the CLEC volume for this measure. BellSouth proposes to exclude these test transactions. (RQ5877)

Impact of Change: For September 2004, .02% of the LENS transactions were test transactions. For EDI, .003% were test transactions.

(2) *Affected Measures:* O-9 (Georgia and Kentucky)

Description of Change: Currently, the minimum number of minutes for the >6 hour interval bucket for this measure is set to 369 minutes instead of 360 minutes. This is causing LSRs confirmed between 360 and 368 minutes not to be reported in this interval bucket. BellSouth proposes to correct this problem. (RQ5944)

Impact of Change: None to measurement results.

Provisioning Measurements

- (3) *Affected Measures:* P-7, P-7A, P-7B & P-7C

Description of Change: Currently, BellSouth is displaying an extra character to the beginning of the ACNA code in the raw data for these measures. BellSouth proposes to remove the extra character to the ACNA. (RQ5809)

Impact of Change: None to measurement results.

Other Measurements

- (4) *Affected Measures:* All

Description of Change: Where a CLEC enters into an agreement(s) with BellSouth for services not subject to the SQM plan, such services should not be reflected in the SQM data in accordance with the parties' agreement(s). BellSouth will implement coding changes to effect this change. (RQ5868)

Impact of Change: None.

561063

PARTIES OF RECORD

Docket No. 7892-U

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