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May 3, 2006

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:

In April 2005, the Liberty Consulting Group completed a third-party audit of the prior SQM/SEEM plan. In connection with Liberty's audit, please find enclosed the third supplemental affidavit of Alphonse Varner along with an attachment to Mr. Varner's affidavit. A copy of the same is being provided to all parties of record.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record  
Jerry D. Hendrix  
James Meza, III

DOCUMENT NUMBER-DATE  
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**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 3rd day of May, 2006 to the following:

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Robert A. Culpepper

**(+) Signed Protective  
Agreement**

#502166

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment )  
Of Operations Support Systems Permanent )  
Performance Measures for Incumbent )  
Local Exchange Telecommunications. )  
Companies (BellSouth Track). )

Docket No.: 000121A-TP

Filed: May 1, 2006

**THIRD SUPPLEMENTAL AFFIDAVIT OF ALPHONSO J. VARNER**

1. My name is Alphonso J. Varner. The following statements are made under oath and are based on personal knowledge.

2. I am currently employed by BellSouth Telecommunications, Inc. ("BellSouth") as Senior Director in Regulatory. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My responsibilities include oversight and supervision of BellSouth's personnel that are responsible for maintaining BellSouth's performance measurement plans (collectively, "SQM/SEEM plan"), including any revisions to the SQM/SEEM plan that may be required. Such plans include the SQM/SEEM plan established by the Florida Public Service Commission ("Commission") in this docket.

3. On September 30, 2005 the Commission Staff ("Staff") requested certain additional information concerning BellSouth's original and supplemental affidavits regarding the Liberty Consulting Group SEEM audit. The second supplemental affidavit responded to that request by the Staff and indicated BellSouth was in the process of verifying that certain action undertaken by BellSouth would adequately address the remaining Findings. This third supplemental affidavit addresses the remaining issues from that request. The details for each of the remaining issues are contained in the attachment filed with this document.

4. With this filing all Findings included in the original Liberty Audit have been resolved.


5. This concludes my third supplemental affidavit.

DOCUMENT NUMBER-DATE

03927 MAY-3 06

FPSC-COMMISSION CLERK

This 1<sup>st</sup> day of May, 2006.


  
ALPHONSO J. VARNER

Sworn to and subscribed

Before me this 1<sup>st</sup>

Day of ~~March~~, 2006

may  
Notary Public



Brenda S. Slaughter  
Notary Public, Rockdale County, Georgia  
My Commission Expires July 29, 2006

# **ATTACHMENT**

## Final Status Report on Implementation of Remaining Changes due to Staff's Recommendations Regarding Liberty's Final Report of the Audit of BellSouth's Performance Assessment Plan for Florida

The following items were scheduled for implementation but not completed as of the last update, dated October 13, 2005.

**Finding 4:** BellSouth did not report the Z-scores according to the SQM Plan reporting requirements in the 12-month PMAP reports for measures B-7 (Recurring Charge Completeness) and B-8 (Non-Recurring Charge Completeness). Classification: 4

- B-7 (Recurring Charge Completeness) and B-8 (Non-Recurring Charge Completeness) – Z-scores are missing for the resale disaggregation only. BellSouth stated that RQ6110 has been initiated to correct this issue.

**Response 4:** RQ6110 was implemented with September 2005 data in PMAP Release 4.5.09. The following is an excerpt from the PMAP data (October 2004 – September 2005) showing the results for these measures and includes current Z-scores for the resale disaggregation in the Florida SQM Plan, which shows that this issue has been resolved. Also these measures were eliminated upon implementation of the current SQM with the October 2005 data month.

Florida, October 2004 - September 2005

Billing

Recurring Charge Completeness

% fractional recurring charges appearing on the correct bill

Numerator indicates total number of recurring charges billed on the correct bill(next available bill)

Volume indicates total recurring charges.

State	Measure Month	Product Group Description	Benchmark / Analog	BST Numerator	BST Volume	BST Metric	GLEC Numerator	GLEC Volume	GLEC Metric	Std Dev	Std Error	Zscore	Effort
FL	Oct-04	Resale	RETAIL	82,324,942	8,172,166	99.16%	82,324,942	8,172,166	99.16%			10.21	YES
FL	Nov-04	Resale	RETAIL	82,316,708	8,102,467	99.10%	82,316,708	8,102,467	99.10%			5.92	YES
FL	Dec-04	Resale	RETAIL	82,249,956	8,085,660	99.07%	82,249,956	8,085,660	99.07%			22.52	YES
FL	Jan-05	Resale	RETAIL	82,592,311	8,242,174	99.07%	82,592,311	8,242,174	99.07%			26.30	YES
FL	Feb-05	Resale	RETAIL	83,528,907	8,437,666	99.07%	83,528,907	8,437,666	99.07%			31.27	YES
FL	Mar-05	Resale	RETAIL	84,448,933	8,524,827	99.07%	84,448,933	8,524,827	99.07%			27.18	YES
FL	Apr-05	Resale	RETAIL	85,769,716	8,636,467	99.07%	85,769,716	8,636,467	99.07%			48.59	YES
FL	May-05	Resale	RETAIL	86,158,205	8,716,260	99.07%	86,158,205	8,716,260	99.07%			26.97	YES
FL	Jun-05	Resale	RETAIL	88,157,358	8,774,331	99.10%	88,157,358	8,774,331	99.10%			38.50	YES



FL	Oct-04	Resale	RETAIL	25,743,763	33,684,769	76.43%	257,256	272,464	94.42%			-103.87	YES
FL	Nov-04	Resale	RETAIL	25,463,431	27,766,713	91.70%	248,541	253,162	98.17%			-33.52	YES

**Florida, October 2004 - September 2005**

**Billing**

**Non-Recurring Charge Completeness**

**% of non-recurring charges appearing on the correct bill**

**Numerator indicates total number of non-recurring charges billed on correct bill (next available bill).**

**Volume indicates total non-recurring charges.**

State	Measure Month	Product Group Description	Benchmark / Analog	BSR Numerator	BSR Volume	BSR Metric	QREC Numerator	QREC Volume	QREC Metric	Std Dev	Std Error	Z-Score	Equity
FL	Oct-04	Resale	RETAIL	\$25,743,763	\$33,684,769	76.43%	\$257,256	\$272,464	94.42%			-103.87	YES
FL	Nov-04	Resale	RETAIL	\$25,463,431	\$27,766,713	91.70%	\$248,541	\$253,162	98.17%			-33.52	YES
FL	Dec-04	Resale	RETAIL	\$23,076,850	\$24,560,534	93.96%	\$237,833	\$242,572	98.05%			-20.46	YES
FL	Jan-05	Resale	RETAIL	\$21,813,291	\$22,662,418	96.25%	\$234,451	\$236,597	99.09%			-13.94	YES
FL	Feb-05	Resale	RETAIL	\$23,313,982	\$24,695,991	94.40%	\$301,537	\$304,040	99.18%			-26.80	YES
FL	Mar-05	Resale	RETAIL	\$21,143,731	\$22,924,072	92.23%	\$285,521	\$287,421	99.34%			-39.27	YES
FL	Apr-05	Resale	RETAIL	\$23,775,012	\$25,569,333	92.98%	\$305,495	\$309,955	98.56%			-31.77	YES
FL	May-05	Resale	RETAIL	\$24,377,021	\$25,387,090	96.02%	\$473,862	\$541,867	87.45%			59.64	NO
FL	Jun-05	Resale	RETAIL	\$22,572,579	\$24,279,238	92.97%	\$486,383	\$489,571	99.35%			-45.64	YES
FL	Jul-05	Resale	RETAIL	\$24,162,039	\$25,105,268	96.24%	\$421,883	\$424,060	99.49%			-21.29	YES
FL	Aug-05	Resale	RETAIL	\$22,603,010	\$26,472,242	85.38%	\$399,234	\$402,790	99.12%			-93.09	YES
FL	Sep-05	Resale	RETAIL	\$21,701,777	\$23,011,766	94.31%	\$409,311	\$411,525	99.46%			-33.64	YES

**Finding 7: BellSouth posts only the most recent month of PARIS reports for viewing by the CLECs on the PMAP website. Historical PARIS reports are not available. This is in contrast to BellSouth’s practice of having previous months’ reports available for a full year for the majority of SQM Plan reports. Classification: 4**

Section 2.4 of the SEEM Administrative Plan states the requirements for posting SEEM data as follows: “Final Validated SEEM reports will be posted on the 15th day of the month, following the final validated SQM report or the first business day thereafter.” Section 2.8 states that “BellSouth shall retain the performance measurement raw data files for a period of 18 months and further retain the monthly reports produced in PMAP for a period of three years.”

On BellSouth's PMAP website, BellSouth currently makes available the PARIS (SEEM) and SQM Plan reports. A CLEC can log in and view the most recent 12 months of their CLEC-specific SQM Plan results. However, the CLEC can only view the most recent month of PARIS reports.

**Response 7:** BellSouth has agreed to provide 12 months of statewide aggregate SEEM data as well. RQ6008 was implemented with September 2005 data in PARIS Release 4.5.09 on November 15th, which completes the changes necessary to fulfill this commitment. This finding is now resolved.

**Finding 42:** BellSouth did not properly align the product IDs for troubles and the lines on which they occurred for M&R-2 (Customer Trouble Report Rate), causing mismatches and resulting in assignment of either the troubles or the lines to the wrong sub-measure in SQM reports and SEEM remedy payment calculations. **Classification: 2**

As part of its SQM report and remedy payment replication for M&R-2, Liberty noted a number of examples in which there were troubles in the numerator of this measure but no corresponding lines in the denominator. BellSouth informed Liberty that some M&R-2 results could have troubles in the numerator without any corresponding lines in the denominator. BellSouth explained that this could occur for several reasons, including situations in which a trouble was reported during the month but the line was disconnected before the line count was taken early in the following month, or the line changed ownership after the trouble was reported but before the line count was taken.

BellSouth replied to this finding by indicating that it "agrees with Liberty's assessment with respect to the trouble tickets being assigned the incorrect product ID" and that "it corrected this problem with RQ5673, implemented in the November 2004 data month." BellSouth has also "opened RQ6147 to address the issue with the trouble reports." Neither RQ5673 nor RQ6147 contain enough detail about BellSouth's process changes to enable Liberty to assess whether they will fix the problem identified in this finding.

**Response 42:** RQ6147 was implemented in PMAP Release 4.5.10 with October 2005 data. BellSouth has verified that beginning with October 2005 data, no mismatches exists between the troubles reported in the numerator and lines included in the denominator for this measure. This finding is now resolved.

**Finding 51:** BellSouth performed no validation to detect invalid zero dollar remedy payments during the audit period. **Classification: 4**

**Response 51:** BellSouth began the automated process to classify zero payments, which will begin with the pass/fail indication for each calculation being confirmed with the January 2006 SEEM data. This finding is now resolved.