

Robert A. Culpepper
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September 29, 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:

Enclosed is BellSouth Telecommunications, Inc.'s Responses to Staff's First and Second Set of Action Items. 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

651567

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 29th day of September, 2006 to the following:

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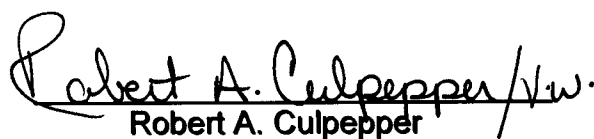
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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for OSS-1 if the proposed exclusion regarding timeouts was adopted. The exclusion should be applied to at least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: The impact to the SQM data of the proposed exclusion of timeouts from the OSS-1 measure for the LENS interface is provided in Attachment A. Due to the small impact of the change, and the difficulty with calculating the results for the other interfaces, BellSouth would not propose to calculate the results for EDI and TAG. Please advise if the results for the other interfaces are still needed. Further, in order to calculate the precise SEEM impact for this change, a rerun of the data is required, which is resource intensive. Based on a review of the extremely small change to measurement results reflected in Attachment A, the SEEM impact for LENS would be negligible.

Yr-Mth	Source	Contract Name	Total Duration	Total Duration W/O Timeouts	Total Count	Total W/O Timeouts	Average Duration	Average Duration W/O Timeouts	Difference
200607	LENS	BY ADDR	563532.515	563488.445	439052	439032	1.283521121	1.283479211	0.000041909
200607	LENS	BY TN	293486.389	290881.679	233952	233779	1.254472665	1.244259232	0.010213433
200607	LENS	CRSECSRL	853099.239	853082.349	577830	577821	1.476384471	1.476378237	0.000006235
Yr-Mth	Source	Contract Name	Total Duration	Total Duration W/O Timeouts	Total Count	Total W/O Timeouts	Average Duration	Average Duration W/O Timeouts	Difference
200606	LENS	BY ADDR	496639.829	496632.117	483744	483725	1.026658375	1.026682758	-0.000024383
200606	LENS	BY TN	166743.02	166661.7	258006	257836	0.646275746	0.646386463	-0.000110717
200606	LENS	CRSECSRL	539118.089	539107.427	632767	632752	0.852000956	0.852004303	-0.000003347
Yr-Mth	Source	Contract Name	Total Duration	Total Duration W/O Timeouts	Total Count	Total W/O Timeouts	Average Duration	Average Duration W/O Timeouts	Difference
200605	LENS	BY ADDR	478829.555	478560.085	497650	497584	0.962181362	0.96176743	0.000413932
200605	LENS	BY TN	186344.462	184981.646	280428	279974	0.6645002	0.660710087	0.003790112
200605	LENS	CRSECSRL	587570.759	587545.99	669267	669249	0.877931766	0.877918368	0.000013397
Yr-Mth	Source	Contract Name	Total Duration	Total Duration W/O Timeouts	Total Count	Total W/O Timeouts	Average Duration	Average Duration W/O Timeouts	Difference
200604	LENS	BY ADDR	479683.198	478777.164	441573	441418	1.086305544	1.084634437	0.001671107
200604	LENS	BY TN	224662.783	219026.433	253630	252199	0.885789469	0.868466699	0.017322770
200604	LENS	CRSECSRL	500005.446	499984.152	593203	593181	0.84289096	0.842886323	0.000004637
Yr-Mth	Source	Contract Name	Total Duration	Total Duration W/O Timeouts	Total Count	Total W/O Timeouts	Average Duration	Average Duration W/O Timeouts	Difference
200603	LENS	BY ADDR	589781.818	588987.837	534956	534791	1.102486593	1.101342089	0.001144505
200603	LENS	BY TN	277798.222	271699.487	320488	319112	0.866797577	0.851423597	0.015373980
200603	LENS	CRSECSRL	721997.883	721968.946	699824	699795	1.031684942	1.031686345	-0.000001403
Yr-Mth	Source	Contract Name	Total Duration	Total Duration W/O Timeouts	Total Count	Total W/O Timeouts	Average Duration	Average Duration W/O Timeouts	Difference
200602	LENS	BY ADDR	484242.131	483625.705	512372	512074	0.945098739	0.944444953	0.000653786
200602	LENS	BY TN	251215.093	245028.954	286828	284128	0.875838806	0.862389325	0.013449481
200602	LENS	CRSECSRL	825969.94	825843.984	586283	586155	1.408824646	1.408917409	-0.000092763

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for OSS-1 if the proposed change in calculations for M&R Response Interval were adopted. The proposed calculation should be applied to a least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: The SQM impact of the proposed change to the M&R Response interval standard is provided in Attachment B. For the period March – August 2006, the SEEM liability for the measure OSS-1 (M&R) is provided below (this measure is Tier 2 only):

▪ March	\$19,890
▪ April	\$16,800
▪ May	\$15,630
▪ June	\$15,750
▪ July	\$15,750
▪ August	\$14,910

The estimated impact of the proposed change is that no SEEM liability would have been incurred for this measure during this period.

Month	System	Total Transactions	Total Duration	BST Avg	BST Avg +2 seconds	CLEC Avg	Parity	Parity + 2
Mar-06	CRIS	1213544.00	1205588.44	1.01	3.01	0.97	Yes	Yes
Mar-06	DLETH	44335.00	22862.36	1.94	3.94	0.60	Yes	Yes
Mar-06	DLR	14372.00	1413.51	10.17	12.17	11.08	No	Yes
Mar-06	LMOS	1213487.00	6236980.46	0.19	2.19	0.19	Yes	Yes
Mar-06	LMOSUPD	696348.00	2186818.63	0.32	2.32	0.35	No	Yes
Mar-06	LNP/GATEWAY	65298.00	303703.27	0.22	2.22	0.23	No	Yes
Mar-06	MARCH	4309.00	45.55	94.61	96.61	78.65	Yes	Yes
Mar-06	NIW	0.00	0.00	0.00	0.00	0.00	No	No
Mar-06	OSPCM	5910.00	1309.08	4.51	6.51	4.98	No	Yes
Mar-06	PREDICTOR	28116.00	400.02	70.29	72.29	66.01	Yes	Yes
Mar-06	SOCS	210350.00	562081.21	0.37	2.37	0.39	No	Yes
Month	System	Total Transactions	Total Duration	BST Avg	BST Avg +2 seconds	CLEC Avg	Parity	Parity + 2
Apr-06	CRIS	1214584.00	1210574.62	1.00	3.00	0.95	Yes	Yes
Apr-06	DLETH	41986.00	65619.19	0.64	2.64	0.54	Yes	Yes
Apr-06	DLR	13076.00	1297.30	10.08	12.08	11.21	No	Yes
Apr-06	LMOS	1214523.00	6364835.62	0.19	2.19	0.19	Yes	Yes
Apr-06	LMOSUPD	703184.00	2241643.15	0.31	2.31	0.33	No	Yes
Apr-06	LNP/GATEWAY	65233.00	301841.20	0.22	2.22	0.24	No	Yes
Apr-06	MARCH	4093.00	38.40	106.58	108.58	113.20	No	No
Apr-06	NIW	0.00	0.00	0.00	0.00	0.00	No	No
Apr-06	OSPCM	5689.00	1251.55	4.55	6.55	5.56	No	Yes
Apr-06	PREDICTOR	25111.00	346.87	72.39	74.39	65.63	Yes	Yes
Apr-06	SOCS	186481.00	499614.32	0.37	2.37	0.37	Yes	Yes
Month	System	Total Transactions	Total Duration	BST Avg	BST Avg +2 seconds	CLEC Avg	Parity	Parity + 2
May-06	CRIS	1331769.00	1368957.47	0.97	2.97	0.92	Yes	Yes
May-06	DLETH	46947.00	76148.99	0.62	2.62	0.58	Yes	Yes
May-06	DLR	13988.00	1409.37	9.92	11.92	10.37	No	Yes
May-06	LMOS	1331693.00	7165766.58	0.19	2.19	0.18	Yes	Yes
May-06	LMOSUPD	773214.00	2473166.01	0.31	2.31	0.33	No	Yes
May-06	LNP/GATEWAY	72682.00	260907.50	0.28	2.28	0.28	No	Yes
May-06	MARCH	4587.00	41.55	110.38	112.38	75.77	Yes	Yes
May-06	NIW	31507.00	26348.95	1.20	3.20	0.37	Yes	Yes
May-06	OSPCM	6027.00	1384.38	4.35	6.35	4.98	No	Yes
May-06	PREDICTOR	27662.00	379.51	72.89	74.89	65.81	Yes	Yes
May-06	SOCS	207054.00	563277.61	0.37	2.37	0.35	Yes	Yes

Month	System	Total Transactions	Total Duration	BST Avg	BST Avg +2 seconds	CLEC Avg	Parity	Parity + 2
Jun-06	CRIS	1409886.00	1410971.71	1.00	3.00	0.93	Yes	Yes
Jun-06	DLETH	53579.00	84979.91	0.63	2.63	0.53	Yes	Yes
Jun-06	DLR	13786.00	1407.72	9.79	11.79	10.25	No	Yes
Jun-06	LMOS	1409821.00	6956594.33	0.20	2.20	0.20	Yes	Yes
Jun-06	LMOSUPD	801011.00	2360188.71	0.34	2.34	0.34	Yes	Yes
Jun-06	LNP/GATEWAY	76457.00	183229.33	0.42	2.42	0.52	No	Yes
Jun-06	MARCH	4488.00	38.50	116.58	118.58	71.35	Yes	Yes
Jun-06	NIW	41214.00	28834.30	1.43	3.43	0.43	Yes	Yes
Jun-06	OSPCM	5438.00	1280.09	4.25	6.25	5.04	No	Yes
Jun-06	PREDICTOR	25389.00	346.69	73.23	75.23	64.07	Yes	Yes
Jun-06	SOCS	236590.00	647576.57	0.37	2.37	0.35	Yes	Yes
Month	System	Total Transactions	Total Duration	BST Avg	BST Avg +2 seconds	CLEC Avg	Parity	Parity + 2
Jul-06	CRIS	1415987.00	1411994.20	1.00	3.00	0.93	Yes	Yes
Jul-06	DLETH	57213.00	96700.79	0.59	2.59	0.53	Yes	Yes
Jul-06	DLR	13430.00	1364.32	9.84	11.84	10.24	No	Yes
Jul-06	LMOS	1415921.00	7033528.57	0.20	2.20	0.20	Yes	Yes
Jul-06	LMOSUPD	817722.00	2470841.05	0.33	2.33	0.33	No	Yes
Jul-06	LNP/GATEWAY	77471.00	185707.18	0.42	2.42	0.38	Yes	Yes
Jul-06	MARCH	3884.00	22.89	169.70	171.70	73.05	Yes	Yes
Jul-06	NIW	40821.00	22562.79	1.81	3.81	0.53	Yes	Yes
Jul-06	OSPCM	5563.00	1357.53	4.10	6.10	5.04	No	Yes
Jul-06	PREDICTOR	23850.00	409.21	58.28	60.28	49.50	Yes	Yes
Jul-06	SOCS	239191.00	647436.48	0.37	2.37	0.35	Yes	Yes
Month	System	Total Transactions	Total Duration	BST Avg	BST Avg +2 seconds	CLEC Avg	Parity	Parity + 2
Aug-06	CRIS	1591695.00	1576726.50	1.01	3.01	0.92	Yes	Yes
Aug-06	DLETH	66811.00	110717.81	0.60	2.60	0.52	Yes	Yes
Aug-06	DLR	14852.00	1517.22	9.79	11.79	10.15	No	Yes
Aug-06	LMOS	1591622.00	7623722.70	0.21	2.21	0.20	Yes	Yes
Aug-06	LMOSUPD	945628.00	2712293.90	0.35	2.35	0.35	Yes	Yes
Aug-06	LNP/GATEWAY	84541.00	227614.80	0.37	2.37	0.40	No	Yes
Aug-06	MARCH	5278.00	54.27	97.26	99.26	82.97	Yes	Yes
Aug-06	NIW	43221.00	29478.54	1.47	3.47	0.50	Yes	Yes
Aug-06	OSPCM	5785.00	1410.72	4.10	6.10	4.84	No	Yes
Aug-06	PREDICTOR	25635.00	355.76	72.06	74.06	65.31	Yes	Yes
Aug-06	SOCS	274263.00	737833.51	0.37	2.37	0.35	Yes	Yes

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for O-8 if the change in the standards were adopted. The proposed standards should be applied to a least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: The SQM results for the Reject Interval measure if the CLECs' proposed changes in standards had been in effect for Partially Mechanized (PM) and Non-Mechanized (NM) LSRs, as well as the results based on the current standards, are provided below. In other words, the results in the chart are based on the implicit assumption that the same staffing level was in place if the CLECs' proposed intervals had been in effect. BellSouth is not representing that it would not change staffing levels to provide the level of service mandated by this Commission.

Month	Type	CLEC Proposal			Current	
		Benchmark	Numerator	Volume	Metric Result	
Jan-06	PM	95% <= 8 Hours	8454	10148	83.31%	93.48%
Feb-06	PM	95% <= 8 Hours	7858	8515	92.28%	95.34%
Mar-06	PM	95% <= 8 Hours	11293	14794	76.34%	88.52%
Apr-06	PM	95% <= 8 Hours	8402	10503	80.00%	87.38%
May-06	PM	95% <= 8 Hours	8556	11100	77.08%	89.72%
Jun-06	PM	95% <= 8 Hours	7944	9011	88.16%	95.16%
Jul-06	PM	95% <= 8 Hours	8798	10114	86.99%	96.85%
Jan-06	NM	95% <= 12 Hours	1024	1537	66.62%	77.81%
Feb-06	NM	95% <= 12 Hours	1660	1722	96.40%	98.66%
Mar-06	NM	95% <= 12 Hours	1685	2609	64.58%	98.16%
Apr-06	NM	95% <= 12 Hours	1319	1417	93.08%	97.95%
May-06	NM	95% <= 12 Hours	1504	1626	92.50%	98.59%
Jun-06	NM	95% <= 12 Hours	1282	1340	95.67%	99.10%
Jul-06	NM	95% <= 12 Hours	1176	1468	80.11%	95.91%

Using the SQM impacts from above, the SEEM impacts for those six months would range from \$899,150 to \$2,023,087. In order to provide actual SEEM Tier 1 and Tier 2 remedies for the Reject Interval measure under the CLEC proposal, BellSouth would have to rerun the PARIS data to determine the fail-month counts, which would vary from the current results. This would be resource intensive. To calculate this range, BellSouth first calculated the Total Affected Volumes (TAVs) for all of the CLECs who were due payments, if the proposed standard were adopted. For the low-end range, the TAVs were multiplied by the First Month Failure remedy amount and for the high end of the range the TAVs were multiplied by the Month 6 Failure remedy amount. BellSouth did take into account the appropriate multiplier based on whether the measure would have failed or would not have failed at the CLEC aggregate level. The results below reflect the incremental SEEM remedies based on this approach by month for the low end of the range.

<u>Month</u>	<u>Partially Mechanized</u>		<u>Non-Mechanized</u>	
	<u>Tier 1</u>	<u>Tier 2</u>	<u>Tier 1</u>	<u>Tier 2</u>
January	\$53,180	\$ -	\$7,600	\$ -
February	\$12,860	\$ -	\$250	\$ -
March	\$96,160	\$165,660	\$37,850	\$ -
April	\$76,550	\$94,500	\$1,600	\$ -
May	\$97,880	\$119,340	\$2,050	\$2,460
June	\$28,120	\$3,960	\$500	\$500
July	\$40,080	\$48,600	\$9,450	\$ -
Total	\$404,830	\$432,060	\$59,300	\$2,960

As previously stated BellSouth is not representing that it will not attempt to meet the standards set by this Commission. In order meet the more stringent intervals proposed by the CLECs for the Reject Interval measure, identified for this action item, and for the FOC Timeliness measure, identified in action item 5, BellSouth would incur significant additional costs. BellSouth's preliminary estimate of additional economic staffing costs required to meet the proposed decreased intervals to be about \$1.8 million dollars per year. The \$1.8 million represents the combined impact resulting from the proposed changes to the Reject Interval and the FOC Timeliness measures.

Consequently, if these standards are changed, Bellsouth will incur significant additional cost either through increased SEEM payments, increased staffing cost or, more likely, some combination of the two. In any event, there has been no evidence produced that the current standards do not allow an efficient CLEC a meaningful opportunity to compete; so there is no justification to impose any of these additional costs.

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for O-9 if the change in the standard was adopted. The proposed standard should be applied to a least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: The impact of the CLECs' proposed change to the SQM results for FOC Timeliness is provided in Attachment C. The results in the chart are based on the assumption that the same staffing level that currently exists would remain in place if the interval is changed.

BellSouth indicated, in its response to action item 4, that the combined impact of staffing to meet the CLEC-proposed intervals for the Reject Interval and FOC Timeliness measures is estimated to be about \$1.8 million.

The same approach to estimating SEEM impacts that was used in the response to Item 4 was used in this response. If the assumption is that BellSouth did not change its staffing level, using the same approach described in BellSouth's response to Action Item 4 (*i.e.*, not taking into account the Fail Month Count), the incremental SEEM impact ranges from \$284,260 if a Fail Month Count of 1 is used on all TAVs, to \$639,585 if a Fail Month Count of 6 is used. The monthly impact for the low end of the range is provided below:

Month	Non-Mechanized	
	Tier 1	Tier 2
January	\$18,950	\$ -
February	\$16,800	\$ -
March	\$100,760	\$124, 020
April	\$9,150	\$11,460
May	\$13,360	\$17,400
June	\$9,950	\$22,260
July	\$53,100	\$137,940
Total	\$109,120	\$175,140

State	Month	Mechanization	Product Group Description	CLEC Proposal			Current Metric
				Benchmark	Numerator	Volume	
FL	Jan-06	Non Mechanized	LNP (Standalone)	95% <= 12 Hours	93	148	62.84%
FL	Feb-06	Non Mechanized	LNP (Standalone)	95% <= 12 Hours	147	154	95.45%
FL	Mar-06	Non Mechanized	LNP (Standalone)	95% <= 12 Hours	95	159	59.75%
FL	Apr-06	Non Mechanized	LNP (Standalone)	95% <= 12 Hours	141	153	92.16%
FL	May-06	Non Mechanized	LNP (Standalone)	95% <= 12 Hours	143	154	92.86%
FL	Jun-06	Non Mechanized	LNP (Standalone)	95% <= 12 Hours	125	128	97.66%
FL	Jul-06	Non Mechanized	LNP (Standalone)	95% <= 12 Hours	83	95	87.37%
FL	Jan-06	Non Mechanized	Resale Business (Non-Design)	95% <= 12 Hours	66	92	71.74%
FL	Feb-06	Non Mechanized	Resale Business (Non-Design)	95% <= 12 Hours	85	99	85.86%
FL	Mar-06	Non Mechanized	Resale Business (Non-Design)	95% <= 12 Hours	63	110	57.27%
FL	Apr-06	Non Mechanized	Resale Business (Non-Design)	95% <= 12 Hours	79	88	89.77%
FL	May-06	Non Mechanized	Resale Business (Non-Design)	95% <= 12 Hours	85	100	85.00%
FL	Jun-06	Non Mechanized	Resale Business (Non-Design)	95% <= 12 Hours	48	56	85.71%
FL	Jul-06	Non Mechanized	Resale Business (Non-Design)	95% <= 12 Hours	25	106	23.58%
FL	Jan-06	Non Mechanized	Resale Design	95% <= 12 Hours	0	1	0.00%
FL	Feb-06	Non Mechanized	Resale Design	95% <= 12 Hours	2	5	40.00%
FL	May-06	Non Mechanized	Resale Design	95% <= 12 Hours	1	2	50.00%
FL	Jun-06	Non Mechanized	Resale Design	95% <= 12 Hours	4	4	100.00%
FL	Jul-06	Non Mechanized	Resale Design	95% <= 12 Hours	1	1	100.00%
FL	Jan-06	Non Mechanized	Resale Residence (Non-Design)	95% <= 12 Hours	909	1351	67.28%
FL	Feb-06	Non Mechanized	Resale Residence (Non-Design)	95% <= 12 Hours	763	954	79.98%
FL	Mar-06	Non Mechanized	Resale Residence (Non-Design)	95% <= 12 Hours	1420	2881	49.29%
FL	Apr-06	Non Mechanized	Resale Residence (Non-Design)	95% <= 12 Hours	1685	1784	94.45%
FL	May-06	Non Mechanized	Resale Residence (Non-Design)	95% <= 12 Hours	1809	1873	96.58%
FL	Jun-06	Non Mechanized	Resale Residence (Non-Design)	95% <= 12 Hours	789	843	93.59%
FL	Jul-06	Non Mechanized	Resale Residence (Non-Design)	95% <= 12 Hours	712	2401	29.65%
FL	Jan-06	Non Mechanized	UNE Analog Loop	95% <= 12 Hours	396	748	52.94%

State	Month	Mechanization	Product Group Description	CLEC Proposal			Current Metric
				Benchmark	Numerator	Volume	
FL	Feb-06	Non Mechanized	UNE Analog Loop	95% <= 12 Hours	482	704	68.47%
FL	Mar-06	Non Mechanized	UNE Analog Loop	95% <= 12 Hours	533	890	59.89%
FL	Apr-06	Non Mechanized	UNE Analog Loop	95% <= 12 Hours	590	758	77.84%
FL	May-06	Non Mechanized	UNE Analog Loop	95% <= 12 Hours	812	1063	76.39%
FL	Jun-06	Non Mechanized	UNE Analog Loop	95% <= 12 Hours	287	448	64.06%
FL	Jul-06	Non Mechanized	UNE Analog Loop	95% <= 12 Hours	830	1299	63.90%
FL	Jan-06	Non Mechanized	UNE Analog Loop w/LNP	95% <= 12 Hours	14	20	70.00%
FL	Feb-06	Non Mechanized	UNE Analog Loop w/LNP	95% <= 12 Hours	20	22	90.91%
FL	Mar-06	Non Mechanized	UNE Analog Loop w/LNP	95% <= 12 Hours	21	24	87.50%
FL	Apr-06	Non Mechanized	UNE Analog Loop w/LNP	95% <= 12 Hours	9	13	69.23%
FL	May-06	Non Mechanized	UNE Analog Loop w/LNP	95% <= 12 Hours	21	44	47.73%
FL	Jun-06	Non Mechanized	UNE Analog Loop w/LNP	95% <= 12 Hours	59	86	68.60%
FL	Jul-06	Non Mechanized	UNE Analog Loop w/LNP	95% <= 12 Hours	9	9	100.00%
FL	Jan-06	Non Mechanized	UNE Digital Loop >= DS1	95% <= 12 Hours	137	220	62.27%
FL	Feb-06	Non Mechanized	UNE Digital Loop >= DS1	95% <= 12 Hours	208	254	81.89%
FL	Mar-06	Non Mechanized	UNE Digital Loop >= DS1	95% <= 12 Hours	208	335	62.09%
FL	Apr-06	Non Mechanized	UNE Digital Loop >= DS1	95% <= 12 Hours	246	276	89.13%
FL	May-06	Non Mechanized	UNE Digital Loop >= DS1	95% <= 12 Hours	292	346	84.39%
FL	Jun-06	Non Mechanized	UNE Digital Loop >= DS1	95% <= 12 Hours	122	189	64.55%
FL	Jul-06	Non Mechanized	UNE Digital Loop >= DS1	95% <= 12 Hours	202	311	64.95%
FL	Jan-06	Non Mechanized	UNE EELs	95% <= 12 Hours	277	399	69.42%
FL	Feb-06	Non Mechanized	UNE EELs	95% <= 12 Hours	318	402	79.10%
FL	Mar-06	Non Mechanized	UNE EELs	95% <= 12 Hours	314	461	68.11%
FL	Apr-06	Non Mechanized	UNE EELs	95% <= 12 Hours	304	338	89.94%
FL	May-06	Non Mechanized	UNE EELs	95% <= 12 Hours	294	345	85.22%
FL	Jun-06	Non Mechanized	UNE EELs	95% <= 12 Hours	144	286	50.35%
FL	Jul-06	Non Mechanized	UNE EELs	95% <= 12 Hours	326	476	68.49%

State	Month	Mechanization	Product Group Description	CLEC Proposal			Current Metric
				Benchmark	Numerator	Volume	
FL	Jan-06	Non Mechanized	UNE ISDN/UDC/IDSL	95% <= 12 Hours	9	19	63.16 %
FL	Feb-06	Non Mechanized	UNE ISDN/UDC/IDSL	95% <= 12 Hours	16	18	100.00 %
FL	Mar-06	Non Mechanized	UNE ISDN/UDC/IDSL	95% <= 12 Hours	21	33	90.91 %
FL	Apr-06	Non Mechanized	UNE ISDN/UDC/IDSL	95% <= 12 Hours	17	23	86.96 %
FL	May-06	Non Mechanized	UNE ISDN/UDC/IDSL	95% <= 12 Hours	21	24	100.00 %
FL	Jun-06	Non Mechanized	UNE ISDN/UDC/IDSL	95% <= 12 Hours	11	20	60.00 %
FL	Jul-06	Non Mechanized	UNE ISDN/UDC/IDSL	95% <= 12 Hours	21	32	84.38 %
FL	Jan-06	Non Mechanized	UNE Line Splitting/Sharing	95% <= 12 Hours	6	8	75.00 %
FL	Feb-06	Non Mechanized	UNE Line Splitting/Sharing	95% <= 12 Hours	3	4	75.00 %
FL	Mar-06	Non Mechanized	UNE Line Splitting/Sharing	95% <= 12 Hours	2	5	100.00 %
FL	Apr-06	Non Mechanized	UNE Line Splitting/Sharing	95% <= 12 Hours	1	1	100.00 %
FL	May-06	Non Mechanized	UNE Line Splitting/Sharing	95% <= 12 Hours	4	4	100.00 %
FL	Jun-06	Non Mechanized	UNE Line Splitting/Sharing	95% <= 12 Hours	0	1	100.00 %
FL	Jul-06	Non Mechanized	UNE Line Splitting/Sharing	95% <= 12 Hours	1	2	50.00 %
FL	Jan-06	Non Mechanized	UNE Loop + Port Combinations	95% <= 12 Hours	56	89	76.40 %
FL	Feb-06	Non Mechanized	UNE Loop + Port Combinations	95% <= 12 Hours	106	129	96.90 %
FL	Mar-06	Non Mechanized	UNE Loop + Port Combinations	95% <= 12 Hours	77	99	98.99 %
FL	Apr-06	Non Mechanized	UNE Loop + Port Combinations	95% <= 12 Hours	25	29	96.55 %
FL	May-06	Non Mechanized	UNE Loop + Port Combinations	95% <= 12 Hours	33	38	94.74 %
FL	Jun-06	Non Mechanized	UNE Loop + Port Combinations	95% <= 12 Hours	10	11	100.00 %
FL	Jul-06	Non Mechanized	UNE Loop + Port Combinations	95% <= 12 Hours	6	12	66.67 %
FL	Jan-06	Non Mechanized	UNE Other	95% <= 12 Hours	192	254	86.61 %
FL	Feb-06	Non Mechanized	UNE Other	95% <= 12 Hours	290	304	97.04 %
FL	Mar-06	Non Mechanized	UNE Other	95% <= 12 Hours	301	384	98.44 %
FL	Apr-06	Non Mechanized	UNE Other	95% <= 12 Hours	318	334	99.40 %
FL	May-06	Non Mechanized	UNE Other	95% <= 12 Hours	538	578	98.27 %
FL	Jun-06	Non Mechanized	UNE Other	95% <= 12 Hours	238	252	98.02 %
FL	Jul-06	Non Mechanized	UNE Other	95% <= 12 Hours	257	276	96.38 %

State	Month	Mechanization	Product Group Description	CLEC Proposal			Current Metric
				Benchmark	Numerator	Volume	
FL	Jan-06	Non Mechanized	UNE xDSL (HDSL, ADSL, and UCL)	95% <= 12 Hours	35	51	88.24 %
FL	Feb-06	Non Mechanized	UNE xDSL (HDSL, ADSL, and UCL)	95% <= 12 Hours	53	58	96.55 %
FL	Mar-06	Non Mechanized	UNE xDSL (HDSL, ADSL, and UCL)	95% <= 12 Hours	45	58	100.00 %
FL	Apr-06	Non Mechanized	UNE xDSL (HDSL, ADSL, and UCL)	95% <= 12 Hours	41	42	100.00 %
FL	May-06	Non Mechanized	UNE xDSL (HDSL, ADSL, and UCL)	95% <= 12 Hours	61	65	98.46 %
FL	Jun-06	Non Mechanized	UNE xDSL (HDSL, ADSL, and UCL)	95% <= 12 Hours	56	59	96.61 %
FL	Jul-06	Non Mechanized	UNE xDSL (HDSL, ADSL, and UCL)	95% <= 12 Hours	49	54	98.15 %

REQUEST: Please provide an analysis of the impact to SQM and SEEM for each change proposed for Appendix C.2, Statistical Properties and Definitions. The impact should be applied to at least six months of historical SQM and SEEM data, and include the impact to Tier 1 and 2 payments.

RESPONSE: The changes proposed by BellSouth to Appendix C.2 created a zone of reasonableness for these measures to be consistent with the existence of a zone of reasonableness that applies to other retail analog measures and applies to SEEM only; therefore, the proposed changes would not affect the SQM. The following chart contains the SEEM remedy amounts under the current plan, under the proposed plan, and the difference for the period January – June 2006.

Measure	SEEM Total for January – June 2006		
	Current Remedy (\$)	Proposed Remedy (\$)	Difference (\$)
OSS Response Interval (Pre-ordering/Ordering)	0	0	0
OSS Response Interval (Maintenance & Repair)	130,170	0	(130,170)
Billing Invoice Accuracy	9,206	8,054	(1152)
Billing Mean Time to Deliver Invoices	53	21	(32)
Average Answer Time – Ordering Centers	15,132	0	(15,132)
Trunk Group Performance	1050	0	(1050)

The measures OSS Response Interval (Pre-ordering/Ordering), OSS Response Interval (Maintenance & Repair), and Average Answer Time – Ordering Centers are Tier 2 only measures, so the impacts are for four months. The measures Billing Invoice Accuracy, Mean Time to Deliver Invoices, and Trunk Group Performance are Tier 1 and Tier 2 measures.

REQUEST: Please provide a proposal for ramping-off a Force Majeure event and returning to SEEM remedies. At a minimum, the proposal should include the following factors: event severity, grace period (no payments), time-frame (modified payments), deadline for returning to full payment, and performance measures impacted.

RESPONSE: During a force majeure event, BellSouth proposes that the Emergency Preparedness and Restoration – Local Services (“Emergency Preparedness”) document that was provided to the CLECs in Carrier Notification SN91086145, on July 5, 2006, be used as the basis for declaring and ending the force majeure exclusion of SEEM Payments for retail analog measures in the Provisioning, Maintenance and Repair, and Trunk Group Performance domains (Affected Measures). The Emergency Preparedness document contains a color-coded methodology that is used to identify the status of wire centers from the stage at which the wire centers are most severely impacted (designated red or orange) to the stage at which conditions are improving, approaching normal conditions or back to normal conditions (designated yellow or green). The following describes the proposed application of the force majeure provision of SEEM for the Affected Measures.

Severity Category 1: This severity category would apply if any wire center in the state requires a color code of red or orange, as defined in the Emergency Preparedness document, at the onset of the Force Majeure event. At this severity level, the following provisions would apply:

- a) The Force Majeure exception for SEEM payments applies statewide for all Affected Measures for the lesser of ninety (90) days or the point at which no wire centers remains at severity code red or orange;
- b) Any extension of the statewide exception for SEEM payments beyond 90 days requires concurrence from the Commission Staff;
- c) If no extension beyond the initial 90-day period applies, the Force Majeure exception for SEEM payments will continue for the Affected Measures in any wire centers with a status of red or orange as long as that status continues. As the status of those wire centers changes to yellow or green, the force majeure exception will apply to those wire centers as defined under Severity 2.

Severity Category 2: This severity category would apply if the most severe damage of any wire center requires a severity code of yellow at the onset of the Force Majeure event, or where any wire center requires a severity code of yellow after the expiration of the statewide exception, applicable under the Severity 1 classification. At this severity level, the following provisions would apply:

- a) The Force Majeure exception for SEEM payments applies, to the Affected Measures in those wire centers where the severity code of yellow exists, for the lesser of forty-five (45) days, or the point at which the status of the impacted wire center becomes green;
- b) At the end of the 45-day period, the Force Majeure exception for SEEM payments expires for the measures Missed Installation Appointments (MIA) and Missed Repair Appointments (MRA), and continues for the other Affected Measures in those wire centers until the status of the impacted wire centers become green.

- REQUEST:
- a. Please provide the Bellsouth Telecommunication Florida projected net revenues over the next 5 years.
 - b. Please provide the BellSouth Telecommunications Florida specific dollar amount that is equivalent to the 36% cap over the next 5 years.
 - c. Please determine the BellSouth Telecommunications Florida specific SEEM payments over the most recent 12-month period assuming a 100 percent performance failure rate for received transactions. What percentage of BellSouth Telecommunications Florida net revenues does this represent?

- RESPONSE:
- a. BellSouth is unable to provide projected net revenues for the next five years. However, the method used by the FCC for calculating net revenues, or actually "Net Return," is based on Automatic Report Management Information System ("ARMIS") data. ARMIS data is not based on projected net return, but rather is based on the most recent year's actual data. *See Memorandum Opinion and Order, In the Matter of Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-region, InterLATA Service in the State of New York, CC Docket 99-295, para. 436 (Dec. 22, 1999) ("Bell Atlantic-New York Order").* Therefore, BellSouth has provided net return based on Florida ARMIS data for the most recent 5 years. See also Attachment 1.

(Dollars in Thousands)		
Year	Total Net Return	Cap at 36%
2001	985,516	354,786
2002	697,489	251,096
2003	833,565	300,083
2004	748,852	269,587
2005	746,281	268,661

- b. See response to part a. See also Attachment 1.

c. The estimate of Florida specific SEEM payments over the most recent 12-month period assuming a 100 percent performance failure rate for many measures is shown below.

For this estimate, the calculated SEEM payments at a 100% failure rate does not include failures for all measurements in the SEEM plan. For example, the cost provided does not include the impact of 100% failure for:

- OSS Response Interval
- Average Answer Time – Ordering Center
- Acknowledgement Message Completeness
- Timeliness of Change Management Notices
- Timeliness of Documentation Associated with Change
- Percentage of Software Errors Corrected in “X” Business Days
- Percentage of Change Requests Accepted or Rejected within 10 Days
- Percentage of Software Change Requests Implemented within 60 Weeks of Prioritization

Also, the calculation for the Customer Trouble Report Rate measure assumes only a 3% difference between BellSouth retail and CLEC report rates. Further, no administrative costs associated with the SEEM plan are considered.

For the measures that were included, the change in SEEM was based on 6-months of calculated Tier 1 payments and 4 months of Tier 2 payments. These amounts are then annualized to yield an estimated cost for a 12-month period. The chart below summarized the calculated SEEM payments under this scenario.

Tier	Month	Analog Measures	Benchmark Measures	All Measures
1	January	12,365,391	49,960,726	62,326,118
1	February	30,717,607	53,018,441	83,736,048
1	March	43,812,863	91,023,898	134,836,761
1	April	53,247,067	91,800,558	145,047,625
1	May	71,819,077	116,683,852	188,502,928
1	June	70,166,932	95,669,177	165,836,109
6-Month Tier 1 Total		282,128,937	498,156,651	780,285,589
2	March	11,294,899	69,019,310	80,314,210
2	April	29,973,738	65,843,977	95,817,715
2	May	25,202,201	68,906,725	94,108,926
2	June	22,207,967	64,598,363	86,806,330
4-Month Tier 2 Total		88,678,805	268,368,375	357,047,180
Annualized Tier 1		564,257,875	996,313,303	1,560,571,178
Annualized Tier 2		266,036,414	805,105,126	1,071,141,541
Annualized Total		830,294,289	1,801,418,429	2,631,712,718

Based on the annualized data above, at 100% failure, SEEM liability would be about \$2.5 billion. This represents about 350% of BellSouth's net return based on year 2005 ARMIS data. Thus, under the current plan, the 100% failure rate on received transactions generates 9.7 times (350%/36%) the 36% cap limit. Consequently, an argument can be made that application of the New York fee schedule as discussed in the *Bell Atlantic – New York Order*, would require a substantial reduction in the current SEEM fee schedule to at most one-tenth of the current amount..

ARMIS Row	ARMIS Row Title	(Dollars in Thousands)														
		2005			2004			2003			2002			2001		
		State	Interstate	State	Interstate	State	Interstate	State	Interstate	State	Interstate	State	Interstate	State	Interstate	
1090	Total Operating Revenues	2,688,764	1,438,246	2,720,317	1,401,318	2,869,096	1,306,762	2,713,703	1,271,076	2,713,703	1,271,076	3,118,672	1,283,155			
1190	Total Operating Expenses	2,148,090	892,207	2,134,920	866,294	2,049,694	816,027	2,045,190	787,829	2,045,190	787,829	1,952,407	728,189			
1290	Other Operating Income/Losses	8501	3213	110	42	437	164	266	100	266	100	-3999	-1523			
1390	Total Non-operating Items (Exp)	-110,913	-50	-102,003	166	-74,792	61	-19,099	419	-19,099	419	18,927	-418			
1490	Total Other Taxes	88,092	48,185	90,951	51,620	107,827	48,968	113,015	52,817	113,015	52,817	188,850	70,100			
1590	Federal Income Taxes (Exp)	164,889	161,943	174,701	156,286	249,965	145,144	168,962	138,523	168,962	138,523	297,251	155,483			
Net Return		407,107	339,174	421,858	326,994	536,839	296,726	405,901	291,588	405,901	291,588	657,238	328,278			
Total Net Return (State + Interstate)			746,281		748,852		833,565		697,489		697,489		985,516			
Cap of 36%			268,661		269,587		300,083		251,096		251,096		354,786			

Notes:

- The data above was taken from FCC Report 43-01, The ARMIS Annual Summary Report, rows 1090, 1190, 1290, 1390, 1490, and 1590, columns (g) and (h), website, <http://svartifoss2.fcc.gov/eafs/paper/43-01/PaperReport01.cfm>
- Net Return = Row 1090 - Row 1190 + Row 1290 - Row 1390 - Row 1490 - Row 1590

REQUEST: Please provide a proposal for expanding the Reason Codes for SEEM adjustments.

RESPONSE: BellSouth believes that there is no need to expand the existing set of reason codes. As part of the discussions that took place during the last 6-month review, as well as subsequent input from CLECs through BellSouth's CLEC Interface Group, BellSouth expanded the list of available reason codes for SEEM adjustments to the PARIS Transmitted Payment Report in March 2006. BellSouth now has thirteen reason codes and proposes to continue to use this recently expanded list of adjustment codes provided below:

- IC – Inclement Weather
- CR – Changed PSC Requirement
- MC – Mitigating Circumstance (no longer utilized)
- SE – Software Error
- CE – Manual Calculation Error
- DE – Data Error
- TP – Triple Pay for Nascent Srvs.
- RR – PARIS Re-Run
- FM – Failure Month Count
- SP – Subsequent pass in a rerun
- AB – Alternate Benchmark
- RA – Adjustment to existing remedy
- NF – New failure in a re-run

These codes and descriptions are available on the PMAP website. Further, CLECs have the opportunity, if necessary, to request more detail via the PARIS report Feedback form.

REQUEST: Please discuss the feasibility of accumulating proposed PMAP notification changes to individual measures to understand the overall impact to performance measures.

RESPONSE: BellSouth believes that it is feasible to accumulate the impact of multiple changes to a single measure in a given month. It is, however, not feasible for BellSouth to aggregate multiple months worth of changes to a particular measure to determine the overall impact to that measure. Attempting to do so would be overly burdensome to BellSouth given that the individual changes to a particular measure may be associated with several different RQs, with different implementation dates. Moreover, the actual impacts of the changes are not ascertainable until the RQs are implemented. Even then, BellSouth would not be able to easily determine which changes resulted in specific changes to the reported results. Further, changes in the product mix ordered by CLECs, mergers and acquisitions in the CLEC community and PSC orders can cause shifts in the data that are not caused by BellSouth's code changes.

BellSouth has already invested significant resources participating in external audits to ensure that the PMAP code is correct and that changes to the code were handled appropriately. Through the course of these audits, no material issues were found and BellSouth continues to be subject to external audits. Consequently, the CLECs' proposal will serve only to add more complexity to the process, with little apparent benefit to the industry. Given that the point of BellSouth making changes to its code is to comply with the SQM, if any changes are made to the process the aim should be simplification and BellSouth would propose to streamline the process.

In order to streamline the Data Notification process, and provide a better understanding of the overall impact of measurement changes, BellSouth proposes making the following modifications to the process (see also Attachment 2, Redline version of the Data Notification Policy):

1. BellSouth will aggregate changes to a single measure with multiple RQ's during a single release month to determine the overall impact to the metric.
2. BellSouth proposes to eliminate one of the Data Notifications and the associated industry call. Instead, there would be a single notice and industry call for Proposed Data Changes only, which would occur at the currently scheduled time that applies to the Preliminary Data Notification and industry call. This eliminates the need to discuss the same proposed changes twice. This streamlines the process and eliminates redundant work activities with respect to a specific identified change.
3. BellSouth proposes to no longer place changes on the Data Notification document that have no impact on reported results. For example, if the problem addressed by a proposed change is data displayed incorrectly on a report, and not incorrect data, this correction would not appear on the Notice.

This proposal by BellSouth is based on the assumption that agreement can be reached with the CLECs to implement the above changes on a regional basis.

Appendix F: BellSouth PMAP Data Notification Process

1. On the first business day of the month sixty (60) days preceding the data month for which BellSouth proposes to make any change to the method by which its performance data is calculated, BellSouth will provide written notice of any such proposed changes (hereinafter referred to as "Proposed Data Changes"). This notice will identify the affected measure(s), describe the proposed change, provide a reason for the proposed change, and outline its impact. ~~At the same time BellSouth will provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following data month (hereinafter referred to as "Preliminary Data Changes").~~
2. No later than four business days after the written notice referenced above has been provided, BellSouth will conduct an industry conference call at which time the affected parties as well as the Commission can ask questions about ~~either the Proposed Data Changes or the Preliminary Data Changes~~. The call will be conducted from 2:00 to 5:00 p.m. (Eastern Time).
3. No later than ten (10) business days after the industry conference call, affected parties must file written comments with the Commission to the extent they have objections or concerns about the Proposed Data Changes.
4. The ~~Proposed~~ Preliminary Data Changes set forth in the written notice referenced above would be presumptively valid and deemed approved by the Commission effective ~~thirty (30)~~ sixty (60) calendar days after that notice unless the Commission Staff directs BellSouth not to go forward with the changes.

REQUEST: a. Please provide an analysis of the impact to SQM and SEEM for P-4 if the change in the retail analog (interval guide) was adopted. The impact should be applied to at least six months of historical SQM and SEEM data, and include the impact to Tier 1 and 2 payments.

b. Please provide input regarding the possibility of locking-in the intervals as reported in the Intervals Guide in lieu of the BST proposal for retail analog/benchmarks for P-4 and only changing them upon annual reviews of the Performance Assessment Plan.

RESPONSE: a. There are three product categories in the SQM for which BellSouth proposed a change to the P-4 measurement standard based on the interval guide. These three product categories are: UNE xDSL (HDSL, ADSL and UCL) without conditioning, UNE xDSL (HDSL, ADSL and UCL) with conditioning and UNE Line Splitting/Sharing with Conditioning. For UNE Line Splitting/Sharing with Conditioning, there was no activity for the six-month period from March - August 2006. For the UNE xDSL product categories with activity for this six-month period, there was no change to the equity indicator, and no change to SEEM results. Attachment 3 contains data for the categories with activity for the period March – August 2006.

b. Of course, one approach to setting measurement intervals for the products identified is to lock-in intervals reported in the Interval Guide, which would then remain in effect until changed at an annual review. This, however, does not address BellSouth's concern that the intervals in the Interval Guide are subject to change and the SQM would not match the Interval Guide. Therefore, BellSouth still believes that pointing to the Interval Guide is preferable to locking-in the intervals until changed in annual review.

Florida, September 2005 - August 2006

Provisioning

OCI - Order Completion Interval

(Interval between Order Issuance and Order Completion)

Volume indicates total number of service orders completed for this disaggregation in the reporting period
 Numerator indicates total of completion intervals for this disaggregation in the reporting period

State	Month	Product Group Description	Current Benchmark	Dispatch Type	Circuit	CLEC Numerator	CLEC Volume	CLEC Metric	Equity w/ Current Benchmark	Equity w/ Interval Guide Benchmark
FL	Sep-05	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Oct-05	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Nov-05	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Dec-05	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Jan-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Feb-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Mar-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits	6	1	6	YES	YES
FL	Apr-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	May-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits	5	1	5	YES	YES
FL	Jun-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Jul-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Aug-06	UNE xDSL (HDSL, ADSL, and UCL) with Conditioning	<= 12 Days	Dispatch	<6 Circuits					<= 11 Days
FL	Sep-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	317	65	4.88	YES	YES
FL	Oct-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	797	78	10.22	NO	NO
FL	Nov-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	651	92	7.08	NO	NO
FL	Dec-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	654	124	5.27	NO	NO
FL	Jan-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	496	101	4.91	YES	YES
FL	Feb-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	519	107	4.85	YES	YES
FL	Mar-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	487	98	4.97	YES	YES
FL	Apr-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	589	113	5.21	NO	NO
FL	May-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	588	115	5.11	NO	NO
FL	Jun-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	582	107	5.44	NO	NO
FL	Jul-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits	617	123	5.02	NO	NO
FL	Aug-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Dispatch	<6 Circuits					<= 5 Days
FL	Sep-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	97	21	4.62	YES	YES
FL	Oct-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	60	7	8.57	NO	NO
FL	Nov-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	116	18	6.44	NO	NO
FL	Dec-05	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	32	7	4.57	YES	YES
FL	Jan-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	90	19	4.74	YES	YES
FL	Feb-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	146	29	5.03	NO	NO
FL	Mar-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	133	27	4.93	YES	YES
FL	Apr-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	194	38	5.11	NO	NO
FL	May-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	225	47	4.79	YES	YES
FL	Jun-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	127	25	5.08	NO	NO
FL	Jul-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits	181	39	4.54	YES	YES
FL	Aug-06	UNE xDSL (HDSL, ADSL, and UCL) without Conditioning	<= 5 Days	Non-Dispatch	<6 Circuits					<= 5 Days

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 May only be used for authorized BellSouth business purposes
 and only by authorized individuals.

REQUEST: Over the most recent three months of data, please provide the number of hot-cuts where the conversion reflected a zero cut interval for **P-7**.

RESPONSE: For the three-month period, May – July 2006, the number of hot-cuts reflecting a zero cut interval for measure P-7 are shown below:

Data Month	Cuts with Zero Duration	Total Service Orders
May	6	468
June	3	404
July	1	637
Total	10	1509

This really means that there were 10 orders with an actual cut time of less than 1 minute, and such times were rounded down to zero. This does not mean that the actual time was zero.

- REQUEST:
- a. Please provide an analysis on retaining the original due dates for LSRs that were rejected in error in lieu of the CLECs proposed measurement **P-12A**.
 - b. Please provide the Florida aggregate number of LSRs rejected in error over the past 6 months.
 - c. Please explain why CLEC orders are placed in “duration” and held for 48 hours after being screened for errors as described in CLECs proposed business rules for **P-12B**.

- RESPONSE:
- a. As an initial matter, it is a misnomer to refer to “retaining an original due date” when a CLEC’s LSR is rejected in error. This is because until BellSouth provides a FOC to the CLEC, there is no original due date. In the event that an LSR is rejected in error, BellSouth uses its best efforts to provide the “requested due date” to the CLEC. See the response to part c, which explains the process used when an LSR is rejected in error.
 - b. There is no practical way to track the number of LSRs clarified in error by BellSouth’s Service Representatives. Moreover, for manually submitted LSRs, this would require a manual review of LSRs, which is not feasible in a production mode. Thus, for purposes of attempting to estimate this value, BellSouth assumed that any partially mechanized LSR that was clarified and an associated FOC is subsequently issued, with no change in the version of the LSR, was clarified in error.

Based on Florida data, the chart below shows, for the six-month period March – August 2006, the number of partially mechanized LSRs clarified, the estimated number LSRs clarified in error (based on the assumption stated above), and the corresponding estimated percentage clarified in error.

Month	Total LSRs Clarified	Estimated # of LSRs Clarified in Error by Service Reps.	Estimated% Clarified in Error
March	21379	355	1.66%
April	16960	226	1.33%
May	16156	295	1.83%
June	13762	289	2.10%
July	15715	349	2.22%
August	17962	346	1.93%
Total	101934	1860	1.82%

These results show that less than 2% of LSRs were clarified in error by the centers, based on BellSouth's approach of estimation, over this 6-month period. Further, based on the total LSRs submitted for Florida over this period, which was about 830,917, only about 0.22% were potentially clarified in error by the centers.

- c. As previously stated, BellSouth does not understand the CLEC's statement regarding service requests placed in duration for 48 hours. BellSouth continues to use best efforts to achieve the interval commitments set forth for FOCs. Meeting the FOC interval would in turn allow providing the standard due dates, as if the LSR had not been rejected in error. The interval commitments for FOCs are 3 hours for fully mechanized LSRs, 10 hours for Partially Mechanized LSRs and 24 hours for Manual LSRs. In light of these measurement interval requirements, it is not in the interest of BellSouth to hold an order for 48 hours if a FOC can be returned to the CLEC within the required interval. Furthermore, holding the LSR for 48 hours would result in BellSouth missing the FOC measurement interval.

The FOC interval for an LSR is calculated by adding the appropriate hours of the interval commitments, 3, 10, or 24, to the receipt time of the version of the LSR. BellSouth makes every effort possible to return an FOC on all LSRs clarified in error, when BellSouth is made aware of the “clarification-in-error” status before the FOC interval expires. BellSouth rarely misses an FOC in these situations and, importantly, thus the service delivery dates are not impacted by BellSouth center LSR processing.

When the FOC interval has expired, BellSouth still strives to return an FOC on the same day that BellSouth is made aware of the clarification error. In these situations for UNE and Complex products, FOCs are generated using the standard interval for the product ordered, reflecting the date that BellSouth removes the LSR from clarification as day zero. If this results in a due date beyond that originally requested, the CLEC can call and request an earlier due date. BellSouth will pursue an expedite due to the BellSouth error. If it is determined that BellSouth can meet the expedite request, a new FOC will be generated with the expedited Due Date. The CLEC is not billed an expedite charge when the request for an expedite is based on a BellSouth error.

Resale LSRs are handled in a similar fashion based upon provisioning being on a non-dispatch or a dispatch basis. For non-dispatch orders, the Resale FOC is generated using a standard due date interval. If a dispatch is required, the FOC is given the next available due date for field dispatch, as determined by BellSouth’s systems.

When BellSouth returns an FOC on an LSR rejected in error, where the FOC interval has not expired, the original requested service date is not impacted by BellSouth center LSR processing. When BellSouth returns an FOC on an LSR rejected in error, where the FOC interval has expired, and the CLEC requested service date is still within the standard interval, the FOC is returned without impact to the original requested service date.

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When BellSouth returns an FOC on an LSR rejected in error for which the FOC interval has expired and the FOC delay causes the requested service date to be beyond the product standard interval, the original requested service date is impacted. If the CLEC calls and requests an earlier due date than the date given on the FOC, an expedite due to a BellSouth error will be pursued. If it is determined that BellSouth can meet the expedite request, a new FOC will be generated with the expedited due date. The CLEC is not billed an expedite change when the request is due to a BellSouth error.

REQUEST: Please provide analysis of the impact to SQM and SEEM data for **M&R-2** if the proposed exclusion to remove troubles captured in P-9 and M&R-4 were adopted.

RESPONSE: The analysis required to provide the impact to SQM and SEEM data based on the removal of troubles in P-9 and M&R-4 from Customer Trouble Report Rate (CTRR) is extensive. This is because the measure P-9, Percent Provisioning Troubles within "X" Days of a Completed Service Order, is calculated one month in arrears, and CTTR is calculated based on the current data month. CTRR would have to be reported one month in arrears to properly exclude troubles captured by measure P-9. Also, because these are retail analog measures and troubles would have to be excluded from both the CLEC side and retail side, the impact is not expected to be significant. Given the extensive level of analysis required to provide the impact of this proposed change, BellSouth requests that it not be required to provide this analysis in this review.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to September 7, 2006
Workshop Action Items (2nd Set)
Filing Date: September 29, 2006
Item No. 10
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REQUEST: Please provide proposed language to be added to the Glossary of the SQM that defines “Valid business days” whereas parity will exist between wholesale and retail hours of operation.

RESPONSE: BellSouth proposes to use the same definition that can be found in the Change Control Process (CCP) document (Section 11.0, Terms and Definitions) for a “business day.”

This is being proposed since the CCP document has already been agreed to by the industry. The definition is as follows:

A business day is considered any Monday – Friday workday that does not fall on an official BellSouth holiday.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to September 12, 2006
Conference Call Action Items
Filing Date: September 29, 2006
Item No. 1
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REQUEST: For CM-11, Please explain the steps between prioritization and implementation for a change request. Please provide a number of days to complete each step based on change request magnitude.

RESPONSE: BellSouth will provide a response to this action item on October 6, 2006, as agreed to by Staff.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to September 12, 2006
Conference Call Action Items
Filing Date: September 29, 2006
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REQUEST: For CM-11 please provide a proposal for developing timeframes for software releases based on the change request magnitude or complexity.

RESPONSE: BellSouth will provide a response to this action item on October 6, 2006, as agreed to by Staff.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to September 12, 2006
Conference Call Action Items
Filing Date: September 29, 2006
Item No. 3
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REQUEST: For CM-11 please provide the current timeframes for a software modification to BellSouth's retail operations for ordering, provisioning, and maintenance and repair systems based on magnitude of the change. As an example, provide the detailed timeframes from management acceptance to implementation for at least 5 modifications made to retail systems in the past six months.

RESPONSE: BellSouth will provide a response to this action item on October 6, 2006, as agreed to by Staff.