

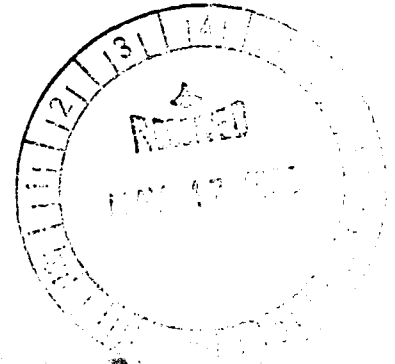


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Florida Cable Telecommunications Association

Steve Wilkerson, President

May 16, 1996



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Mr. Walter D'Haeseleer, Director
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: LEC SERVICE QUALITY; APRIL 9, 1996 DATA REQUEST

Dear Mr. D'Haeseleer:

On behalf of the Florida Cable Telecommunications Association, Inc., this responds to the above-referenced data request. Even though FCTA was not able to attend the workshop and was not formally copied on the data request, we are appreciative of the opportunity to offer the following recommendations to you.

Our initial reaction is to urge caution before easing service quality standards for incumbent LECs. The enclosed data from other states suggests that service quality may degenerate after price regulation is elected. At the very least, it is too early to know for certain that Florida's current standards will be maintained in a price regulated environment. Moreover, quality of service standards imposed on incumbent LECs will become the yardstick by which competitors are judged. So, it is important to recognize the impact that maintaining today's standards will have on consumer expectations no matter which carrier is chosen.

Performance standards for LEC interconnection services are another extremely important part of ensuring service quality in a competitive environment. Competitive product differentiation will occur based on such things as dial tone delays, signal clarity and repair time in addition to price. Without standards among carriers, the incumbent LEC can be expected to use its dominant position to make competitors' services look as unattractive as possible. Competitive LECs in other states have experienced numerous problems in this regard as the enclosed white paper discusses at page 3. BOCs have failed to turn up circuits ordered by competitive LECs; have failed to meet Service Availability standards or Mean Time to Repair standards; have failed to provide access to poles; and have failed to timely assign NXXs. Here in Florida, you are also aware of the numerous problems experienced by competitive payphone providers relating to installations, service order processing, repair procedures, unscheduled movement

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of the pedestals, and degradation of service quality that ALECs should not have to encounter when interconnecting with the incumbent LEC. As co-carriers, ALECs must be treated as equal to the incumbent LEC so that customers of all local exchange providers can be assured of a common level of minimum performance standards. For these reasons we would urge consideration of interconnection performance service quality standards as well. Given the late date that we became aware of the data request, we were unable to draft performance standards by the response deadline. We may be in a position to propose them at a future date if this information would be of assistance to you.

Thank you for your consideration of this information. As always, feel free to contact me with any questions or comments you may have.

Yours very truly,



Laura L. Wilson
Vice President, Regulatory Affairs &
Regulatory Counsel

LLW:baw
Enclosures

cc: Steven E. Wilkerson