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November 19, 1999

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Via Facsimile: 413-7118
(Original to follow via US Mail)

Re: Docket No. 960786-TL
Comments regarding BellSouth Service Quality Measures

Dear Ms. Bayo:

Pursuant to the Notice issued November 12, 1999, in Docket No. 960786, Time Warner Telecom of Florida, L.P., submits the enclosed written comments regarding the South Service Quality Measures dated September 15, 1999.

If you have any questions with regard to the enclosed information, please do not hesitate to contact me.

Respectfully,

PENNINGTON, MOORE, WILKINSON,
BELL & DUNBAR, P.A.

[Handwritten signature: Karen M. Camechis]

Karen M. Camechis

- AFA
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KMC/kmc (enclosure)
cc: Carolyn Marek, Time Warner Telecom
All Parties of Record (w/ enclosure)

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Time Warner Telecom of Florida, L.P. Comments to BST baseline performance metrics
Docket No. 960786-TL

PM Name	Issue	Rationale
1) Average OSS Response Time & Response Interval	4) Need clarification that the business rule captures end to end round trip time for delivery of information. 7) Not clear if level of disaggregation addresses xDSL loop pre-qualification information.	4) Round trip delivery of data provides true representation of BST actual OSS response time. 7) Loop length and capability should be included with OSS response time.
1) OSS Interface Availability	6) Not clear on report structure. 7) Level of disaggregation should be same as Average OSS Response Time.	6) Does "Not CLEC specific" mean aggregate? 7) Same systems are being measured in both measurements.
1) Percent Flow Through Service Requests (Summary)	4) Not clear if business rule for this measure captures or addresses LNP related orders. 6) Report Structure should include CLEC specific and BST (and its affiliates) specific. 7) LNP should be included in levels of disaggregation.	4) LNP related orders are processed via LSR's. 6) CLEC's need point of reference to determine if disparate treatment of its orders is occurring. 7) LNP orders are a major order category for facilities based CLEC's like TWTC.
1) Percent Flow Through Service Requests (Detail)	7) LNP should be included in levels of disaggregation.	7) LNP orders are a major order category for facilities based CLEC's like TWTC.
1) Flow Through Error Analysis	7) Disaggregation by service class and by service type to include specials and LNP are also necessary. 10) Benchmark is diagnostic rather than "Not Applicable".	7) Disaggregation by service type and by service class with allow CLEC's to accurately diagnose where bulk of order errors are occurring. 10) Measure is intended to be a diagnostic tool for CLECs.
1) Percent Rejected Service Requests	6) Add BST (and affiliates) to report structure. 7) Add LNP, UNE design and non-design, and UNE Loop w/out NP to level of disaggregation. Clarify if "Trunks" intended to include Interconnection Trunks.	6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) Current levels of disaggregation do not capture primary CLEC order categories.
1) Reject Interval	6) Add BST (and affiliates) to report structure. 7) Add LNP to level of disaggregation. Clarify whether "Resale - Design" intended to mean Specials.	6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) LNP as a stand-alone category is not addressed with this measure.
1) Firm Order Confirmation Timeliness	6) Add BST (and affiliates) to report structure. 7) Add LNP to level of disaggregation. Clarify	6) CLEC's must have point of reference to determine instances of disparate treatment of

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PM Name	Issue	Rationale
	if scope of Interconnection trunks includes 911, SS7, OS/DA.	its orders. 7) LNP as a stand-alone category is not addressed with this measure.
1) Speed of Answer in Ordering Center	4) Clarify that BST has only 1 LCSC. 7) Add by region or State to level of disaggregation.	7) Performance differences may exist if BST has more than 1 LCSC in a region or State.
1) Mean Held Order Interval & Distribution Intervals	3) Need clarification from BST regarding meaning of "Order activities of BST associated with internal or administrative use of local services". 6) Add BST (and affiliates) to report structure. 7) Add xDSL to levels of disaggregation.	3) BST should not be allowed to excuse itself from reporting on this measure if they are the cause of the Held order. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) xDSL as a stand-alone category is not addressed with this measure.
1) Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice.	2) Add "24 hours" advance notice to definition. 3) Delete from exclusions "Orders submitted to BST through non-mechanized methods." 4) Adjust business rule to correspond to "24 hours" advance notice in definition. 6) Add BST (and affiliates) to report structure.	2) CLEC must have 24 hr. advance notice to advise its customer of service delay. 3) Manual orders should be included with jeopardy notice, as many CLEC's do not process their orders electronically. 4) Business rule does not follow definition after modification. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders.
1) Percent Missed Installation Appointments	4) Do business rules address "specific time" appointments? If not, why? 6) Add BST (and affiliates) to report structure. 7) Add xDSL to level of disaggregation.	4) TWTC would like clarification about where and how "specific time" appointments are addressed. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) xDSL as a stand-alone category is not addressed with this measure.
1) Average Completion Interval (OCI) & Order Completion Interval Distribution.	3) Under exclusions, need BST to define "etc." 6) Add BST (and affiliates) to report structure. 7) Add xDSL to level of disaggregation.	3) Need clarification. 6) CLEC's must have point of reference to determine instances of disparate treatment of

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PM Name	Issue	Rationale
		its orders. 7) xDSL as a stand-alone category is not addressed with this measure.
1) Average Completion Notice Interval	3) Delete from exclusions "Non-mechanized Orders". Clarify administrative use of local services. 4) Adjust business rule to capture CLEC acknowledgment of order completion. 5) Adjust calculation to follow modified business rule. 6) Add BST (and affiliates) to report structure. 7) Add xDSL to level of disaggregation.	3) Manual orders should not be excluded, as many CLEC's do not process their orders electronically. 4) CLEC's must have positive acknowledgment of order completion. 5) Calculation will not match business rule without modification. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) xDSL as a stand-alone category is not addressed with this measure.
1) Coordinated Customer Conversions	4) Clarify that business rule addresses coordinated conversions that fail during provisioning process. If not, where are such occurrences captured? 7) Add LNP and xDSL to level of disaggregation.	4) Sometimes coordinated conversions fail during provisioning and loops must be put back on ILEC service so that customer is not without service. It does not appear the business rule for this measure addresses this problem. 7) LNP and xDSL are not addressed as stand alone categories.
1) % Provisioning Troubles within 30 days of Service Order Activity.	3) Define "etc" under exclusions. 4) Clarify that business rule addresses provisioning troubles before the order is completed. 6) Add BST (and affiliates) to report structure. 7) Add xDSL to level of disaggregation.	3) Need clarification. 4) If business rule does not address provisioning troubles that occur before order completes, where is this captured? 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) xDSL as a stand-alone category is not addressed with this measure.
1) Total Service Order Cycle Time (TSOCT) (under development 3Q99)	3) Define "etc" under exclusions. 4) Modify business rule to capture positive CLEC acknowledgment in total order cycle	3) Need clarification. 4) CLEC must have positive acknowledgment of order completion.

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PM Name	Issue	Rationale
	time. 6) Add BST (and affiliates) to report structure. 7) Add xDSL to level of disaggregation.	6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) xDSL as a stand-alone category is not addressed with this measure.
1) Missed Repair Appointments	4) Modify business rule to incorporate CLEC acknowledgment that trouble is fixed. 6) Add BST (and affiliates) to report structure.	4) CLEC must have positive confirmation from its customer that trouble is fixed before BST is allowed to sign off the ticket. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders.
1) Customer Trouble Report Rate	6) Add BST (and affiliates) to report structure.	6) CLEC's must have point of reference to determine instances of disparate treatment of its orders.
1) Maintenance Average Duration.	3) Under exclusions, please clarify "administrative service". Clarify why reports greater than 10 days are excluded. 4) Modify the business rule to incorporate CLEC acknowledgment that trouble is fixed. 6) Add BST (and affiliates) to report structure.	3) Need clarification on both questions. 4) CLEC must have positive confirmation from its customer that trouble is fixed before BST is allowed to sign off the ticket. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders.
1) Percent Repeat Troubles within 30 days.	3) Under exclusions, please clarify "administrative service." 4) Clarify that business rule captures trouble tickets opened during service order completion as an original customer trouble report. 6) Add BST (and affiliates) to report structure.	3) Need clarification. 4) Need clarification. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders.
1) Out of Service (OOS) > 24 Hours.	2) Under definition, need clarification about how trunk troubles are captured. Is it by partial or entire trunk group? 6) Add BST (and affiliates) to report structure.	2) Need clarification. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders.
1) OSS Interface Availability.	6) Add BST (and affiliates) to report structure.	6) CLEC's must have point of reference to determine instances of disparate treatment of its orders.
1) OSS Response Interval and Percentages.	6) Add CLEC specific, CLEC aggregate, and	6) CLEC's must have point of reference to

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PM Name	Issue	Rationale
	BST affiliates.	determine instances of disparate treatment of its orders.
1) Average Answer Time – Repair Centers.	6) Delete “CLEC aggregate from report structure.	6) CLEC aggregate is duplicated in report structure.
1) Invoice Accuracy.	6) Add BST (and affiliates) to report structure.	6) CLEC’s must have point of reference to determine instances of disparate treatment of its orders.
1) Mean Time to Deliver Invoices	6) Add BST (and affiliates) to report structure.	6) CLEC’s must have point of reference to determine instances of disparate treatment of its orders.
1) Usage Data Delivery Accuracy.	6) Add BST (and affiliates) to report structure. 7) Add by usage type to level of disaggregation.	6) CLEC’s must have point of reference to determine instances of disparate treatment of its orders. 7) Local and Toll usage are not distinguished as stand alone categories.
1) Usage Data Delivery Completeness.	6) Add BST (and affiliates) to report structure. 7) Add by usage type to level of disaggregation.	6) CLEC’s must have point of reference to determine instances of disparate treatment of its orders. 7) Local and Toll usage are not distinguished as stand alone categories.
1) Usage Data Delivery Timeliness.	6) Add BST (and affiliates) to report structure. 7) Add by usage type to level of disaggregation.	6) CLEC’s must have point of reference to determine instances of disparate treatment of its orders. 7) Local and Toll usage are not distinguished as stand alone categories.
1) Mean Time to Deliver Usage.	6) Add BST (and affiliates) to report structure. 7) Add by usage type to level of disaggregation.	6) CLEC’s must have point of reference to determine instances of disparate treatment of its orders. 7) Local and Toll usage are not distinguished as stand alone categories.
1) Speed to Answer Performance/Average Speed to Answer – Toll	6) Add by region to report structure if more than one call center in State.	6) Must have additional distinction if more than 1 call center in State.
1) Speed to Answer Performance/Percent Answered within “X” Seconds – Toll	6) Add by region to report structure if more than one call center in State.	6) Must have additional distinction if more than 1 call center in State.
1) Speed to Answer Performance/Average	6) Add by region to report structure if more	6) Must have additional distinction if more

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PM Name	Issue	Rationale
Speed to Answer – Directory Assistance (DA)	than one call center in State.	than 1 call center in State.
1) Speed to Answer Performance/Percent Answered within “X” Seconds – Directory Assistance (DA).	6) Add by region to report structure if more than one call center in State.	6) Must have additional distinction if more than 1 call center in State.
1) E911/Timeliness	3) Why are facilities based CLEC’s excluded?	3) Need clarification.
1) E911/ Accuracy.	3) Why are facilities based CLEC’s excluded?	3) Need clarification.
1) E911/Mean Interval	3) Why are facilities based CLEC’s excluded? 10) Under Retail Analog/Benchmark, has this been determined via certified audit?	3) Need clarification. 10) Need clarification.
1) Trunk Group Service Report.	3) Under exclusions, when would valid data not be available? Why are high usage trunk groups excluded? 4) Clarify that business rules capture all occurrences of CLEC blocking. Why aren’t weekends included in blocking study? 7) Add by region or MSA to level of disaggregation.	3) Need clarification about when valid data not available. Most of CLEC trunk groups would be considered high usage trunk groups, so TWTC disagrees they should be excluded. 4) BST needs to clarify with CLEC’s how blocking occurrences are captured, as well as why weekends are excluded. Weekends are typically high use times for CLEC customers. TWTC concerned that BST blocking study does not capture occurrences of trunk blocking outside of the busy hour study. 7) State level of disaggregation only may not accurately represent CLEC trunk blocking occurrences in a given market.
1) Trunk Group Service Detail.	3) Why are high use trunk groups excluded? 7) Add by region or MSA to level of disaggregation.	3) Most of CLEC trunk groups would be considered high usage trunk groups, so TWTC disagrees they should be excluded. 7) State level of disaggregation only may not accurately represent CLEC trunk blocking occurrences in a given market.
1) Collocation/Average Response Time	3) Delete from exclusions “requests to augment previously completed arrangements. 6) Add BST (and affiliates) to report structure. 7) Add Cageless collocation arrangements to level of disaggregation.	3) TWTC would like clarification as to why collocation augments should be excluded from this measure. 6) CLEC’s must have point of reference to determine instances of disparate treatment of its orders.

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PM Name	Issue	Rationale
		7) Federal order allows cageless collocation, therefore why exclude it?
1) Collocation/Average Arrangement Time	3) Delete from exclusions "requests to augment previously completed arrangements. 6) Add BST (and affiliates) to report structure. 7) Add Cageless collocation arrangements to level of disaggregation.	3) TWTC would like clarification as to why collocation augments should be excluded from this measure. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) Federal order allows cageless collocation, therefore why exclude it?
1) Collocation/Percent of Due Dates Missed.	3) Delete from exclusions "requests to augment previously completed arrangements. 6) Add BST (and affiliates) to report structure. 7) Add Cageless collocation arrangements to level of disaggregation.	3) TWTC would like clarification as to why collocation augments should be excluded from this measure. 6) CLEC's must have point of reference to determine instances of disparate treatment of its orders. 7) Federal order allows cageless collocation, therefore why exclude it?