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P.O. BOX 10095
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December 22, 1999

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 09 DEC 22 PM 3:04
 RECORDS AND REPORTING

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

Re: Docket No. 960786-TL
Time Warner Telecom of Florida, L.P.
Final Comments regarding BellSouth Performance Metrics

Dear Ms. Bayo:

Time Warner Telecom of Florida, L.P., ("TWTC") respectfully submits the following written comments regarding the BellSouth Performance Metrics:

PM 1 DSL Loop Qualification

What type of response do the CLECs receive with DSL Loop Qualification?
KPMG has indicated that this will be determined during the test; however, it is important that TWTC receive detail loop makeup information so that TWTC can make independent qualification judgements.

PM 3 Percent Flow Through on LNP Orders

TWTC believes the 98% benchmark is sufficient and should stand since it was determined that BellSouth is currently running at 96.11%, which includes BellSouth errors in the calculation (the benchmark does not include CLEC errors). If the BellSouth errors were accounted for and not included in the reporting, BellSouth would most likely be at or near the 98% level.

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- RRR _____
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PM 5 Order Rejections

The standard of notification is too low, i.e. 48 hours is excessive. Also, the standard of notification should be split between automated and manual orders. For example, in California, the standards are:

- 20 minutes for an electronic order;
- 5 hours for an electronically transmitted/Manually held order; and
- 10 hours for a totally manual order.

PM 6 FOC's Returned

Same comments as PM 5.

PM 8 Held Order Interval

BellSouth indicated that the interval is based on the original FOC and not on subsequent supplication to orders. The test will prove this out. The test should include dispersion as well as the standard. How are orders that are 'held' prior to an FOC accounted for? TWTC is concerned that an inordinate amount of orders will be missed in the calculation because of the orders that fall into a 'PF' status prior to an FOC being sent.

PM 9 Jeopardy Notifications

TWTC needs a minimum of 48 hours notice of a problem with an order. This is because the customer and sometimes, multiple vendors, must be contacted and rescheduled in the event of a jeopardy.

Maintenance and Repair

Item 8 Average Answer Time-Repair Centers

Currently, the business centers and residential centers statistics are combined and then averaged. TWTC thinks the business and residential centers should be separate in the calculation because they think the residential call center numbers will skew the results.

Statistical Methodology

BellSouth indicated a desire to use deterministic rather than a statistical approach. TWTC prefers the deterministic approach, i.e., you either make the benchmark or you do not.

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

Respectfully,

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



Karen M. Camechis

KC/kmc

cc: Carolyn Marek, TWTC
Tim Kagele, TWTC
All parties of record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been sent by U. S. Mail to the following parties this 22nd day of December, 1999.

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