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Ms. Blanca S. Bayó
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Re: BellSouth OSS Performance Metrics Docket Nos.
960786-TL and 981834-TP

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RECORDS AND REPORTING

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom, Inc. and ITC^DeltaCom Communications, Inc. are the original and fifteen copies of their Reply Comments on Interim Performance Metrics.

By copy of this letter, this document has been provided to the parties on the attached service list.

Very truly yours,

Richard D. Melson

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

Docket No. 981834-TP

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.

Docket No. 960786-TL

Filed: December 22, 1999

REPLY COMMENTS OF MCI WORLDCOM AND ITC DELTACOM ON INTERIM PERFORMANCE METRICS

MCI WorldCom, Inc. ("MCI WorldCom") and ITC DeltaCom Communications, Inc. ("ITC DeltaCom") hereby file their reply comments on the interim performance metrics to be used during third party testing of BellSouth's operations support systems ("OSS").

I. INTRODUCTION

In their initial comments, MCI WorldCom and ITC DeltaCom identified key changes they recommended to improve BellSouth's Service Quality Measurements ("SQM"). They proposed certain additional metrics as well as improvements to the existing metrics, and they proposed performance standards and a statistical methodology (to be used in the event the parties were unable to agree to such a methodology). MCI WorldCom and ITC DeltaCom noted that the changes they were proposing were limited because of the need to incorporate them quickly for purposes of third party testing.

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FPSC-RECORDS/REPORTING

KPMG and Commission Staff accepted some of these and other proposed changes, but generally recommended only limited alterations to the SQM. In their Proposal for Interim Metrics for the Florida Third Party Test ("KPMG/Staff Proposal"), KPMG and Staff focused on ensuring that standards were in place for all the metrics. They made few changes concerning measurement definition and disaggregation and did not include any of the additional metrics proposed by ALECs. KPMG and Staff expressed concern that making a large number of changes would delay the start of the test. They stated, however, that most of the concerns raised by ALECs that were not recommended for inclusion in BellSouth's SQM would be addressed during the testing process.

MCI WorldCom and ITC^DeltaCom still maintain that their proposed revisions should be accepted and quickly incorporated within BellSouth's SQM. Nevertheless, MCI WorldCom and ITC^DeltaCom recognize that KPMG and Staff must rely to a large degree on BellSouth's representations concerning how long it would take to incorporate changes into its SQM. Because it appears that changes in the performance metrics will be quite limited for third party testing purposes, it will be critical that steps be taken to make up for the gaps remaining in the SQM. Also, it will be essential that appropriate standards be chosen to evaluate BellSouth's performance and that a valid statistical methodology be chosen. These issues are discussed below.

II. PERFORMANCE MEASURES

The KPMG/Staff Proposal recommends few changes in the definitions and business rules in BellSouth's metrics. During the December 17, 1999 workshop, KPMG

noted a number of areas where concerns expressed by ALECs would not be incorporated within the SQM, but nonetheless would be addressed during the test itself. In such cases, KPMG as the Phase II Test Manager would reach a qualitative assessment of BellSouth's performance. For example, with respect to the OSS Interface Availability metric, MCI WorldCom raised the concern that BellSouth could avoid poor performance results by giving late notice of schedule changes and thus appear to have a higher percentage of system availability (as measured against scheduled availability) than warranted. KPMG stated that the metric would not be changed to reflect this concern, but that during Phase II KPMG would determine whether such late notices were skewing reported performance. Based on the December 17 workshop, MCI WorldCom and ITC^DeltaCom understand that other examples of this approach include the following:

- For Percent Rejected Service Requests, KPMG will evaluate whether BellSouth rejects orders erroneously.
- For Firm Order Confirmation Timeliness, KPMG will evaluate FOC completeness and accuracy.
- For Mean Held Order Interval and Order Completion Interval, KPMG will check whether the original FOC date is used for calculation when orders are supplemented.
- For Usage Data Delivery Accuracy, KPMG will evaluate whether packet contents are accurate.
- For Maintenance Average Duration and Average Completion Interval, KPMG will evaluate the difference in the time between work completion and notification of the ALEC.

MCI WorldCom and ITC^DeltaCom have concerns about this approach because it will require KPMG to make qualitative judgments rather than draw conclusions based on pre-established standards. MCI WorldCom and ITC^DeltaCom encourage KPMG, to the extent it uses this approach, to apply sufficiently rigorous standards to ensure that ALECs

are being given a meaningful opportunity to compete. Further, they encourage KPMG to evaluate the proposed modifications to the SQM for use in the permanent metrics.

Lack of disaggregation was another concern raised by MCI WorldCom, ITC^DeltaCom and other ALECs. The KPMG/Staff Proposal states that requests for additional disaggregation generally were not incorporated in the SQM, in part because KPMG and Staff believe that KPMG will be able to obtain the requested disaggregation by parsing the raw data. To the extent KPMG disaggregates the data in this manner, this approach appears acceptable for testing purposes. MCI WorldCom and ITC^DeltaCom respectfully submit that the disaggregation they recommend should be included in the permanent SQM.

ALECs also requested that several additional measurements be included in the SQM. The KPMG/Staff Proposal states that these additional measurements will not be included in the interim SQM, but that they will be used as diagnostics for its test results. At the December 17 workshop, KPMG explained that it would make a qualitative judgment of BellSouth's performance based on these additional metrics, and also would assess the appropriateness of incorporating the metrics into the permanent SQM. Again, MCI WorldCom and ITC^DeltaCom have concerns about basing conclusions on qualitative assessments of BellSouth's performance. They encourage KPMG to require BellSouth to meet rigorous standards that ensure ALECs a meaningful opportunity to compete.

III. RETAIL ANALOGS AND BENCHMARKS

One of the most critical and challenging tasks before testing begins is establishing appropriate performance standards. Standards must be based on objective criteria and

must ensure that ALECs are being provided a meaningful opportunity to compete. At the December 17 workshop, BellSouth repeatedly suggested that performance standards should be based on its current level of performance. Of course, this approach would fail to evaluate whether BellSouth's current level of performance provides ALECs a meaningful opportunity to compete, and indeed would all but ensure that BellSouth would pass the test regardless of whether its performance was good or bad. MCI WorldCom and ITC^DeltaCom encourage Staff and KPMG to choose objective standards that are sufficiently rigorous to ensure that BellSouth's systems will support local competition.

MCI WorldCom and ITC^DeltaCom also offer the following comments on more specific issues relating to performance standards:

- With respect to Percent Missed Installation Appointments, Average Completion Interval and Average Completion Notice Interval, the standards recommended by Staff and KPMG are keyed to BellSouth's interval guide. But the timeframes set forth in the interval guide were established unilaterally by BellSouth and can be changed unilaterally by BellSouth. Meeting such intervals does not necessarily justify a conclusion that BellSouth's performance is adequate. At a minimum, an independent determination should be made whether BellSouth's intervals are appropriate and provide ALECs a meaningful opportunity to compete.
- With respect to flow through, BellSouth stated at the December 17 workshop that it could not meet the 98 percent standard proposed by Staff and KPMG. This admission is surprising, considering that BellSouth has determined the order types for which it will provide flow through. Moreover, the fact that BellSouth does not meet a standard cannot, in itself, be reason for rejecting the standard; otherwise, standards would be pointless. KPMG and Staff should continue to hold BellSouth to a pro-competitive standard for flow through, given its importance to ALEC entry into the Florida local market.
- With respect to Average OSS Response Time and Response Interval, there should be a different "x" (transit time) for each function.

- With respect to Reject Interval and FOC Timeliness, the standards proposed by KPMG and Staff are too long. Other jurisdictions have standards requiring significantly shorter response times. The standards proposed in Exhibit A to the initial comments of MCI WorldCom and ITC^DeltaCom therefore are more appropriate.
- With respect to Mean Held Order Interval and Distribution Intervals, MCI WorldCom and ITC^DeltaCom recommend that the number of days used for the calculation and the standard be the same -- 30/60 days.
- With respect to Total Order Cycle Time, the standard should be categorized according to product type rather than mechanization.

IV. STATISTICAL METHODOLOGY

At the December 17 workshop, statisticians for BellSouth and AT&T provided an update on their discussions concerning statistical methodology. Although substantial progress has been made in these discussions, there are at least two issues that have not been resolved. If these issues can be resolved before testing begins to the satisfaction of the statistical experts for BellSouth, AT&T and MCI WorldCom, then the agreed upon statistical methodology should be used. If not, KPMG, Staff or the Commission will have to select a statistical methodology to be used during the test. As stated in their initial comments, MCI WorldCom and ITC^DeltaCom propose in that case that the "modified z" statistical method (described in Exhibit D to their initial filing) be used.

V. CONCLUSION

MCI WorldCom and ITC^DeltaCom continue to support the changes they proposed in their initial comments. To the extent these changes are not adopted for the interim SQM, MCI WorldCom and ITC^DeltaCom respectfully request that Staff and

KPMG take into account these reply comments when finalizing the interim SQM and executing Phase II of the test.

RESPECTFULLY SUBMITTED this 22nd day of December, 1999

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 22RD day of December, 1999.

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