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Nancy H. Sims
Director - Regulatory Relations

RECORDS AND
REPORTING

February 4, 2000

Blanco Bayo
Director of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32302

RE: Docket 981834-TP – Petition of competitive carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory

Dear Ms. Bayo,

On January 28, 2000, BellSouth, KPMG, members of the Florida PSC Staff and several ALECs met in Tallahassee to discuss the Retail/Analog and benchmarks. Attached are BellSouth's comments as requested by the FPSC staff.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

If you have any further questions, please do not hesitate to call me.

Yours truly,

Director – Regulatory Relations

- AFA _____
- APP _____
- CAF _____
- CMU Summons
- CTR _____
- EAG _____
- LEG 2
- MAS 3
- OPC _____
- RRR _____
- SEC 1
- WAW _____
- OTH _____

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FPSC-RECORDS/REPORTING

Analogs and Benchmarks

Attached is an update of the analogs and benchmarks discussed at the Florida OSS Evaluation Test Interim Performance Metrics workshop of January 28, 2000. This update includes the following revisions:

1. Adds product disaggregation consistent with the Service Quality Measurements ordered by the Florida Public Service Commission, January 18, 2000.
2. Assigns retail analogs for Unbundled Network Elements in two groups. Splits retail analogs for Unbundled Network Elements three categories.
 - a. All UNE Non-Design products will be compared to Retail Residence and Retail Business.
 - b. UNE 2w Loop Design will be compared to Retail Residence and Retail Business.
 - c. The remaining UNE Design products will be compared to Retail Design.

Pre-Ordering OSS Response Interval

The response intervals for the Pre-ordering functions of Due Date Availability, Address Validation, and Telephone Number Availability and Reservation are comparable between BellSouth Retail and ALEC transactions.

The response intervals for BellSouth Retail and ALEC transactions involving Customer Service Record that are reported in BellSouth's Service Quality Measurements will differ for several reasons:

1. BellSouth is required by law to provide security screening processes before an ALEC or a BellSouth Retail representative can view CSR information of another provider's customer. The security processes for the ALEC and BellSouth retail are similar.
2. After the customer is acquired by the ALEC, the ALEC creates its own customer record information in the ALEC's OSS systems and customer inquiries to the ALEC would result in the ALEC accessing its OSS system to view the ALEC customer's record. BellSouth's OSS systems are not queried. The net result is that BellSouth's OSS Response Interval for ALEC CSR transactions is only for those transactions prior to the customer being acquired by the ALEC. These are the transactions that must pass through a security screen.

Reject Interval vs. FOC Interval

There will be a difference in the Reject Interval and FOC Interval Times. The primary reason for this difference is that an LSR rejection involves fewer process steps than the creation of a Service Order and the subsequent issuance of a Firm Order Confirmation.

As an example, LSR Fatal Rejects and Auto Clarifications occur in LEO/LESOG. The notification is then returned to the ALEC without additional system processing.

A complete and accurate LSR passes the edits in LEO/LESOG, a service order is generated, additional edits are applied in SOCS and the FOC is issued from SOCS to LEO.

Statistical Methodology for OSS Testing

As all parties know, BellSouth has worked diligently with the joint CLECs and specifically Collin Mallows of AT&T on statistical methodology. This effort was to develop a reasonable and fair statistical method for the evaluation of performance parity between BellSouth and the CLECs, individually and in aggregate. While our position is consistent regarding these co-developed statistical methods being used for any remedy plan and as the correct tool for evaluating parity, BellSouth does support the methods KPMG has described solely for the purpose of this OSS audit. It is our opinion that KPMG and the commission staff will conduct an OSS audit that is fair to the CLECs and BellSouth.

In addition, BellSouth believes that KPMG will conduct an appropriate test bed and will design the controlled experiment appropriately to address BellSouth and Commission Staff concerns related to properly selecting & comparing the BellSouth transactions to the appropriate CLEC transaction in a like-to-like manner. BellSouth also believes that KPMG will conduct the audit with adequate sample sizes for statistical tests and for load & stress analysis.

Commission Staff expressed concerns relating to alternate methods for balancing the probabilities of type I and type II error. KPMG has full capability to control the designed experiment and can make the decision in the design stage to balance these probabilities. The balancing is solely controlled by the sample size chosen for the test and the alternative hypothesis.

BellSouth is also confident that KPMG will provide a detailed testing plan with documentation that identifies the experimental design, any anomalies that occurred during the testing and the results, once the OSS tests are complete.

BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analogs and Benchmarks

BST SQM Category	MEASURES AND SUB-METRICS	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
Pre-Ordering	Percent Response Received within "X" seconds	Parity w/ retail where applicable.		
	OSS Interface Availability			99.5%
Ordering	Percent Flow-Through Service Request			90%
	• Residence			80%
	• Business			80%
	• UNE			80%
	Percent Rejected Service Request	Diagnostic		Diagnostic.
	Reject Interval (Mechanized)	UD	UD	95% within 1 hrs
	• Reject Interval (Non-Mechanized and Partially Mechanized)	UD	UD	85% < 24 hrs
	Firm Order Confirmation Timeliness (Mechanized)	UD	UD	95% within 4 hrs
	(Non-Mechanized and Partially Mechanized)			85% <48 Hrs
	Speed of Answer in Ordering Center	X	X	
Provisioning	Mean Held Order Interval			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design		Retail Residence and Business	
	• UNE Loop Other with NP Non-Design		Retail Residence and Business	
	• UNE Loop Other without NP Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop with NP – Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Design		Retail Residence and Business	
	• UNE Loop Other with NP – Design		Retail Design	
	• UNE Loop Other without NP - Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Average Jeopardy Notice Interval (Mechanized)			
	• Resale Residence			95% >=24 Hrs.

*Applicable only until an Analog is developed.

BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analogs and Benchmarks

BST SQM Category	MEASURES AND SUB-METRICS	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
	• Resale Business			95% >=24 Hrs.
	• Resale Design			95% >=24 Hrs.
	• Resale PBX			95% >=24 Hrs.
	• Resale Centrex			95% >=24 Hrs.
	• Resale IDSN			95% >=24 Hrs.
	• UNE Loop and Port Combos			95% >=24 Hrs.
	• UNE 2w Loop with NP – Non-Design			95% >=24 Hrs.
	• UNE 2w Loop without NP – Non-Design			95% >=24 Hrs.
	• UNE Loop Other with NP Non-Design			95% >=24 Hrs.
	• UNE Loop Other without NP Non-Design			95% >=24 Hrs.
	• UNE Other Non Design			95% >=24 Hrs.
	• UNE 2w Loop with NP – Design			95% >=24 Hrs.
	• UNE 2w Loop without NP – Design			95% >=24 Hrs.
	• UNE Loop Other with NP – Design			95% >=24 Hrs.
	• UNE Loop Other without NP - Design			95% >=24 Hrs.
	• UNE Other Design			95% >=24 Hrs.
	• Local Interconnection Trunks			95% >=24 Hrs.
	% of Orders given jeopardy notice (Mechanized)			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design		Retail Residence and Business	
	• UNE Loop Other with NP Non-Design		Retail Residence and Business	
	• UNE Loop Other without NP Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop with NP – Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Design		Retail Residence and Business	
	• UNE Loop Other with NP – Design		Retail Design	
	• UNE Loop Other without NP - Design		Retail Design	

*Applicable only until an Analog is developed.

**BellSouth Telecommunications Inc. Florida OSS Evaluation Project
 Analogs and Benchmarks**

BST SQM Category	MEASURES AND SUB-METRICS	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Percent Missed Installation Appointments			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design		Retail Residence and Business	
	• UNE Loop Other with NP Non-Design		Retail Residence and Business	
	• UNE Loop Other without NP Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop with NP – Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Design		Retail Residence and Business	
	• UNE Loop Other with NP – Design		Retail Design	
	• UNE Loop Other without NP – Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Order Completion Interval			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design		Retail Residence and Business	
	• UNE Loop Other with NP Non-Design		Retail Residence and Business	
	• UNE Loop Other without NP Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	

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BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analogs and Benchmarks

BST SQM Category	MEASURES AND SUB-METRICS	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
	• UNE 2w Loop with NP – Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Design		Retail Residence and Business	
	• UNE Loop Other with NP – Design		Retail Design	
	• UNE Loop Other without NP - Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Average Completion Notice Interval – Resale POTS (Mech)			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design		Retail Residence and Business	
	• UNE Loop Other with NP Non-Design		Retail Residence and Business	
	• UNE Loop Other without NP Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop with NP – Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Design		Retail Residence and Business	
	• UNE Loop Other with NP – Design		Retail Design	
	• UNE Loop Other without NP - Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Percent Provisioning Troubles within 30 Days			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design		Retail Residence and Business	

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BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analogs and Benchmarks

BST SQM Category	<i>MEASURES AND SUB-METRICS</i>	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
	• UNE 2w Loop without NP – Non-Design		Retail Residence and Business	
	• UNE Loop Other with NP Non-Design		Retail Residence and Business	
	• UNE Loop Other without NP Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop with NP – Design		Retail Residence and Business	
	• UNE 2w Loop without NP – Design		Retail Residence and Business	
	• UNE Loop Other with NP – Design		Retail Design	
	• UNE Loop Other without NP - Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Total Service Order Cycle Time	Diag.	Diagnostic	Diagnostic
Maintenance	Customer Trouble Report Rate			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop – Non-Design		Retail Residence and Business	
	• UNE Loop Other - Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop – Design		Retail Residence and Business	
	• UNE Loop Other – Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Percent Missed Repair Appointments			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	

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**BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analog and Benchmarks**

BST SQM Category	MEASURES AND SUB-METRICS	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
	• UNE 2w Loop – Non-Design		Retail Residence and Business	
	• UNE Loop Other - Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop – Design		Retail Residence and Business	
	• UNE Loop Other – Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Maintenance Average Duration			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop – Non-Design		Retail Residence and Business	
	• UNE Loop Other - Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop – Design		Retail Residence and Business	
	• UNE Loop Other – Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Percent Repeat Troubles within 30 Days			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop – Non-Design		Retail Residence and Business	
	• UNE Loop Other - Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop – Design		Retail Residence and Business	

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BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analogs and Benchmarks

BST SQM Category	MEASURES AND SUB-METRICS	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
	• UNE Loop Other – Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	Out of Service > 24hrs			
	• Resale Residence	X		
	• Resale Business	X		
	• Resale Design	X		
	• Resale PBX	X		
	• Resale Centrex	X		
	• Resale IDSN	X		
	• UNE Loop and Port Combos		Retail Residence and Business	
	• UNE 2w Loop – Non-Design		Retail Residence and Business	
	• UNE Loop Other - Non-Design		Retail Residence and Business	
	• UNE Other Non Design		Retail Residence and Business	
	• UNE 2w Loop – Design		Retail Residence and Business	
	• UNE Loop Other – Design		Retail Design	
	• UNE Other Design		Retail Design	
	• Local Interconnection Trunks	X		
	OSS Interface Availability			
	• All systems except ECTA	X		
	• ECTA			99.5%
	OSS Response Interval and %			
	• TAFI (Front End)	X		
	• CRIS, DLETH, DLR, OSPCM, LMOS, LMOSUP, MARCH, Predictor, SOCS, LNP (Parity by Design)	PBD		
	Average Answer Time – Repair Center	X		
Billing	Invoice Accuracy	X		
	Mean Time To Deliver Invoices	X		
	Usage Data Delivery Accuracy	X		
	Usage Data Delivery Timeliness	X		
	Usage Data Delivery Completeness	X		
	Mean Time to Deliver Usage	X		
Operator	Average Speed to Answer	PBD		

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BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analogs and Benchmarks

BST SQM Category	MEASURES AND SUB-METRICS	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
Services (Toll)	% Answered in "X" Seconds	PBD		
Directory Assistance	Average Speed to Answer	PBD		
	% Answered in "X" Seconds	PBD		
E911	Timeliness	PBD		
	Accuracy	PBD		
	Mean Interval	PBD		
Trunk Group Performance (Blockage)	Trunk Group Service Report (Percent Trunk Blockage) Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% = a miss using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BST.	X		
	Trunk Group Service Report (Percent Trunk Blockage)	X		
LNP	Average Disconnect Timeliness Interval			UD
	Percent Missed Installation Appointments			UD
	FOC			UD
	% Reject Service Request			UD
	Average Reject Interval			
	TSOC			UD
	% Flow Through			UD
Customer Coordinated Conversions	Coordinated Customer Conversions – UNE Loop			95% ≤ 15min
	Coordinated Customer Conversions – LNP			95% ≤ 15 min
Collocation +	% of Due Dates Missed			90% ≤ Commit Date
	Average Response Time		FL PSC is addressing this in generic docket	
+A contract with each CLEC required.	Average Arrangement Time		FL PSC is addressing this in generic docket	

Note 1: UD = Under Development – Benchmarks will be replaced when Analogs are complete. PBD = Parity by Design

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BellSouth Telecommunications Inc. Florida OSS Evaluation Project
Analogs and Benchmarks

BST SQM Category	<i>MEASURES AND SUB-METRICS</i>	RESALE Retail Analogue	UNEs Retail Analogue	Benchmark*
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Note2: The retail analog for UNE Non-Design and UNE 2w Loops – Design is the average of Retail Residence Dispatch and Retail Business Dispatch transactions for the particular month. The retail analog for other UNE Design is Retail Design Dispatch.

Note3: Analogs and Benchmarks will be re-evaluated 6 months after implementation and periodically thereafter to validate applicability.

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