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April 28, 2000

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BY HAND DELIVERY

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

ORIGINAL

Re: Docket No. 000121-TP

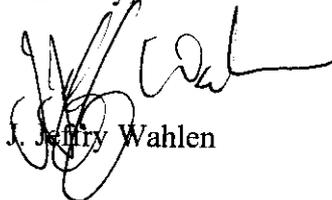
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Comments of ALLTEL Communications, Inc. on Staff's Initial Proposal of a Performance Assessment Plan.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

- AFA *Harvey*
- APP _____
- GAF _____
- CMU *2* cc: All parties of record
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- PRR _____
- SEC _____
- VAVW _____
- OTH _____

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Investigation into the Establishment)
of Operations Support Systems Permanent)
Performance Measures for Incumbent Local)
Exchange Telecommunications Companies)
_____)

DOCKET NO. 000121-TP

Filed: 4/28/00

**COMMENTS OF ALLTEL COMMUNICATIONS, INC.
On Staff's Initial Proposal of a Performance Assessment Plan**

ALLTEL Communications, Inc. ("ALLTEL") hereby files the following Comments in response to Staff's initial proposal of a performance assessment plan developed as a result of the workshop held March 30, 2000 and initial comments filed by parties on April 7, 2000.

In general, ALLTEL agrees with the Performance Assessment Plan proposed by Commission staff. Currently, many ALECs like ALLTEL are already seeking interconnection with the larger ILECs, and setting performance measures is imperative to continuing these competitive endeavors. ALLTEL agrees with staff that standards for smaller ILECs should not be a part of this proceeding. As ALLTEL indicated previously, they are more appropriately addressed through the negotiation process if and when applicable rural exemptions are waived or lifted and interconnection agreements are established.

ALLTEL believes a collaborative effort between Commission Staff, ALECs and ILECs is the best approach to establishing performance standards and associated penalties for non-compliance. Many other states have successfully established performance standards and associated penalties for non-compliance using the workshop or task force method. However,

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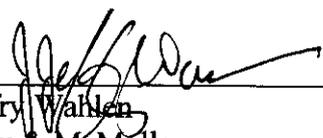
FPSC-RECORDS/REPORTING

further Commission action may be necessary if participants are unable to agree on standards within a reasonable amount of time.

Additionally, ALLTEL agrees with the proposed reporting requirement of the ILECs at the aggregate level and on an individual ALEC basis. It could be disadvantageous to ALECs if an ILEC provides substandard service to all ALECs except the ALEC with the largest volume of activity which then skews the results of the report. ALEC-specific would be a means for ALECs to substantiate complaints when individual results do not support aggregate results.

Overall, ALLTEL is pleased with Commission Staff's efforts to collaboratively develop performance standards which will serve to further open the local telecommunications market, while ensuring nondiscriminatory access to LEC services and facilities. This can only lead to improved telecommunications services in Florida.

Dated this 28th day of April, 2000.



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ATTORNEYS FOR ALLTEL
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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S.

Mail or hand delivery (*) this 28th day of April, 2000, to the following:

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