

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into the establishment  
of operations support systems permanent  
performance measures for incumbent  
local telecommunications companies.

Docket No. 000121-TP

Filed: November 22, 2000

**Comments of KMC Telecom on Staff's Proposal**

KMC Telecom, Inc., KMC Telecom II, Inc. and KMC Telecom III, Inc. (collectively, KMC), pursuant to the Case Assignment and Scheduling Record (CASR) hereby file their comments on Staff's proposed Performance Assessment Plan.

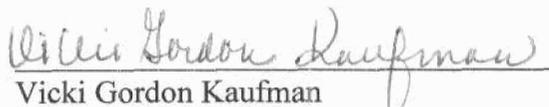
1. KMC commends Staff on its ambitious effort in drafting the Performance Assessment Plan which is the subject of these comments.

2. However, KMC suggests the inclusion of two additional measures which are related to coordinated conversions--Percentage of Premature Disconnects (Coordinate Cutovers) and Loop Disconnect/Cross Connect Interval. Both of these measures have been accepted by and applied to the performance of Southwestern Bell Telephone (SWBT). These suggested measures are attached to these comments.

3. The measurement of Percentage of Premature Disconnects (Coordinated Cutovers) measures the percentage of instances where the incumbent prematurely disconnects the customer prior to the conversion. Measurement of this benchmark is critical because premature disconnects leave the customer without service and more often than not angry at the competitor to whom they are attempting to switch. This measurement is critical to help ensure timely cutovers and thus increased consumer satisfaction with the competitive process.

4. The measurement of Loop Disconnect/ Cross Connect Interval measures the percent of time the technician completes the cross connect to the ALEC within 120 minutes from the start of the conversion. This measurement helps guarantee that the cutover will be completed in a timely manner. Further, the start time is measured from the time the ALEC calls the ILEC to start the conversion. In the case of BellSouth, if a carrier desires a specific start time, it must pay an "order coordination time specific" charge which ranges from \$30.00 to \$50.00. Even though BellSouth will accept the order and issue a Firm Order Confirmation (FOC), it will often later change the conversion start time later, inconveniencing KMC, who has paid for a specific conversion start time, and more importantly inconveniencing the customer. It is important in assessing performance that this measure be included.

**WHEREFORE**, KMC requests that the two measures described above and attached hereto be incorporated in the Performance Assessment Plan.

  
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## COORDINATED CONVERSIONS

<b>114. Measurement</b>	
Percentage of Premature Disconnects (Coordinated Cutovers)	
<b>Definition:</b>	
Percentage of coordinated cutovers where SWBT prematurely disconnects the customer prior to the scheduled conversion.	
<b>Exclusions:</b>	
None	
<b>Business Rules:</b>	
A premature disconnect occurs any time SWBT disconnects the CLEC customer prior to the CLEC authorization.	
<b>Levels of Disaggregation:</b>	
None	
<b>Calculation:</b>	<b>Report Structure:</b>
(Count of prematurely disconnected customers ÷ total coordinated conversion customers) * 100	Reported by CLEC and all CLECs disaggregated by INP and INP with loop, LNP and LNP with loop.
<b>Measurement Type:</b>	
Tier 1 - High Tier 2 - High	
<b>Benchmark:</b>	
2% or less premature disconnects starting 10 minutes before scheduled time.	

<b>114.1 Measurement</b>	
Loop Disconnect/Cross Connect Interval	
<b>Definition:</b>	
The % of time the SWBT technician completes the cross connect to the CLEC facilities within 120 minutes.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• Coordinated Hot Cuts with greater than 24 loops.</li> </ul>	
<b>Business Rules:</b>	
<p>The time from the start of the conversion to the cross connect completion time. The start time is at the direction of the CLEC and based on a negotiated and scheduled time. The clock starts when the CLEC calls the SWBT LOC to start the conversion and ends when the SWBT technician completes the cross connect to the CLEC facilities. This measurement only includes Coordinated Hot Cuts with 1-24 loops. Conversions with 25 or more lines is considered a project and is negotiated with the CLEC at the time of conversion.</p>	
<b>Levels of Disaggregation:</b>	
None	
<b>Calculation:</b>	<b>Report Structure:</b>
Total Coordinated Hot Cuts Within "X" minutes ÷ total Coordinated Hot Cuts.	Reported by CLEC and all CLECs.
<b>Measurement Type:</b>	
<p>Tier 1 - High (\$150 and no escalation)  Tier 2 - Not applicable ( To be addressed at the 6 month review)</p>	
<b>Benchmark:</b>	
Interim -100% within 120 minutes: Final - to be determined at the 6-month review	

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the Comments of KMC Telecom on Staff's Proposal has been furnished by hand delivery(\*) or U.S. mail on this 22nd day of November, to:

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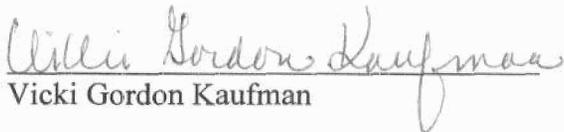
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