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VIA EXPRESS MAIL

Blanca S. Bayo'
Director, Records and Reporting
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 000121-TP - Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies.

Dear Ms. Bayo':

Enclosed please find for filing an original and fifteen copies of Birch Telecom of the South, Inc.'s list of issues that it would like included for resolution in the above-captioned proceeding.

Thank you for your assistance with this filing. Should you have any questions regarding this matter, please do not hesitate to contact me at 919-676-5262.

Sincerely yours,

Monica M. Barone
Director, State Regulation
Birch Telecommunications of the South,
Inc.

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Enclosures
cc: Timothy Vaccaro
Parties of Record

DOCUMENT NUMBER-DATE

00580 JAN 16 2001

FPSC-RECORDS/REPORTING

Docket Number 000121-TP
Investigation into the Establishment of Operations Support Systems
Permanent Performance Measures for
Incumbent Local Exchange Companies

ISSUES LIST OF
BIRCH TELECOM

5.0 Market Penetration Adjustment

- 5.1 Will 100 observations of CLECs in the aggregate adequately measure market penetration for advanced and new services? If not, what level should be established?

6.0 Competitive Entry Volume

6.2 & 6.3

Will the volumes of total transactions proposed ensure that nascent CLECs have an adequate opportunity to establish a market presence? If not, what levels should be established?

Exhibit B

Ordering

0-1& 0-2

1. What is the appropriate benchmark for ordering UNEs that flow-through by design?
2. Should BellSouth be required to measure Order types that flow-through BellSouth's retail OSS, but that are not designed to flow-through BellSouth's wholesale OSS?

0-6

1. What is the appropriate benchmark for partially mechanized reject intervals?

0-7

1. What is the appropriate benchmark for partially mechanized Firm Order Confirmation timeliness?
2. What is the appropriate level of disaggregation for measuring Firm Order Confirmation timeliness?

Additional Measures Birch Supports that are Enumerated on page Fourteen (14) of the Performance Assessment Plan ¹

1. Should the SQM be modified to include Percent Order Accuracy? If so,
 - a. What is the appropriate benchmark?
 - b. What are the appropriate business rules?
 - c. What are the appropriate exclusions?
 - d. What is the appropriate calculation formula?
 - e. What is the appropriate level of disaggregation?

2. Should the SQM be modified to include Percent Billing Errors Correct in X Days? If so,
 - a. What is the appropriate benchmark?
 - b. What are the appropriate business rules?
 - c. What are the appropriate exclusions?
 - d. What is the appropriate calculation formula?
 - e. What is the appropriate level of disaggregation?

¹ This is not to say that Birch would object to including other issues. Birch, by filing this issues list, is merely indicating those issues that it would be prepared to address in testimony at this time.