State of Florida

Public Service Commission

CAPITAL CIRCLE OFFICE CENTER ● 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M

DATE: May 31, 2000

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM: DIVISION OF COMPETITIVE SERVICES (SIMMONS)
DIVISION OF LEGAL SERVICES (KEATING)
DIVISION OF REGULATORY OVERSIGHT (HARVEY, VINSON, HALLENSTEIN)

RE: DOCKET NO. 981834-TP - PETITION OF COMPETITIVE CARRIERS FOR COMMISSION ACTION TO SUPPORT LOCAL COMPETITION IN BELLSOUTH TELECOMMUNICATIONS, INC.'S SERVICE TERRITORY.

DOCKET NO. 960786-TL - CONSIDERATION OF BELLSOUTH TELECOMMUNICATIONS, INC'S ENTRY INTO INTERLATA SERVICES PURSUANT TO SECTION 271 OF THE FEDERAL TELECOMMUNICATIONS ACT OF 1996.

AGENDA: 6/12/01 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: THESE DOCKETS ARE CONSOLIDATED FOR PURPOSES OF OSS TESTING. ALTHOUGH A PANEL IS ASSIGNED TO DOCKET NO. 981834-TP, THE FULL COMMISSION SHOULD VOTE ON THE ISSUES HEREIN BECAUSE THE DOCKETS HAVE BEEN CONSOLIDATED FOR THIS PURPOSE.

FILE NAME AND LOCATION: S:\PSC\RGO\WP\981834e.rcm

ATTACHMENT NAME AND LOCATION: S:\PSC\RGO\WP\attach1-2.doc
S:\PSC\RGO\WP\attach3.pdf (late filed)

CASE BACKGROUND

On December 10, 1998, the Florida Competitive Carriers Association (FCCA), the Telecommunications Resellers, Inc. (TRA), AT&T Communications of the Southern States, Inc. (AT&T), MCImetro Access Transmission Services, LLC (MCImetro), Worldcom Technologies, Inc. (Worldcom), the Competitive Telecommunications Association (Comptel), MGC Communications, Inc. (MGC), and Intermedia Communications Inc. (Intermedia) (collectively, "Competitive Carriers") filed their Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory.

On December 30, 1998, BellSouth Telecommunications, Inc. (BellSouth) filed a Motion to Dismiss the Petition of the Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. BellSouth requested that the Commission dismiss the Competitive Carriers' Petition with prejudice. On January 11, 1999, the Competitive Carriers filed their Response in Opposition to BellSouth's Motion to Dismiss.

By Order No. PSC-99-0769-FOF-TP, issued April 21, 1999, the Commission denied BellSouth's Motion to Dismiss. In addition, the Commission denied the Competitive Carriers' request to initiate a rulemaking proceeding to establish expedited dispute resolution procedures for resolving interconnection agreement disputes. The Commission also directed staff to provide more specific information and rationale for its recommendation on the remainder of the Competitive Carriers' Petition.

On May 26, 1999, the Commission issued Order No. PSC-99-1078-PCO-TP, which granted, in part, and denied, in part, the petition of the Florida Competitive Carriers Association to support local competition in BellSouth's service territory. Specifically, the Commission established a formal administrative hearing process to address unbundled network elements (UNE) pricing, including UNE combinations and deaveraged pricing of unbundled loops. The Commission also ordered that Commissioner and staff workshops on Operations Support Systems (OSS) be conducted concomitantly in an effort to resolve OSS operational issues. The Commission stated that the request for third-party testing of OSS was to be addressed in these workshops. These workshops were held on May 5-6, 1999. The Commission also ordered a formal administrative hearing to

address collocation and access to loop issues, as well as costing and pricing issues.

On May 28, 1999, FCCA and AT&T filed a Motion for Independent Third-Party Testing of BellSouth's OSS. BellSouth filed its Response to this Motion by the FCCA and AT&T on June 16, 1999. That same day, FCCA and AT&T filed a Supplement to the Motion for Third-Party Testing. On June 17, 1999, ACI Corp. (ACI) filed a Motion to Expand the Scope of Independent Third-Party Testing. On June 28, 1999, BellSouth responded to the Supplement filed by FCCA and AT&T. On June 29, 1999, BellSouth responded to ACI's Motion to Expand the Scope of Independent Third-Party Testing. By Order No. PSC-99-1568-PAA-TP, issued August 9, 1999, the Commission denied the motion. Upon its own motion, the Commission approved staff's recommendation to proceed with Phase I of third-party testing of BellSouth's OSS. Phase I of third-party testing required a third party, in this case KPMG Consulting LLC, to develop a Master Test Plan (MTP) that would identify the specific testing activities necessary to demonstrate nondiscriminatory access and parity of BellSouth's systems and processes.

By Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, the Commission approved the KPMG MTP and initiated Phase II of third-party testing of BellSouth's OSS. On February 8, 2000, by Order No. PSC-00-0260-PAA-TP, the Commission approved interim performance metrics to be used during the course of testing to assess the level of service BellSouth is providing to ALECs. By Order No. PSC-00-0563-PAA-TP, issued March 20, 2000, the Commission approved the retail analogs/benchmarks and the statistical methodology that should be used during the OSS third-party testing.

By Order No. PSC-00-2451-PAA-TP, issued December 20, 2000, the Commission approved revised interim performance metrics, benchmarks and retail analogs to be used during the third-party OSS testing. The revised interim metrics were ordered to address several changes made to BellSouth's initial set of interim metrics approved by Order No. PSC-00-0260-PAA-TP. The revised interim metrics included corrections to the business rules used to calculate the metrics and additional levels of detail allowing the metrics to capture BellSouth's performance on newer services such as Local Number Portability (LNP). Since Order No. PSC-00-2451-PAA-TP, BellSouth has issued additional changes to its revised interim metrics in other jurisdictions. This recommendation addresses updates and/or

modifications to the revised performance measures and benchmarks/analogs approved in Order No. PSC-002451-PAA-TP.

JURISDICTION

Section 271(a) of the Telecommunication Act of 1996 (Act) provides that a Regional Bell Operating Company (RBOC) may not provide interLATA services except as provided in Section 271. Section 271(d) of the Act provides, in part, that prior to making a determination under Section 271, the Federal Communications Commission (FCC) shall consult with the State commission of any State that is the subject of a Section 271 application in order to verify the compliance of the RBOC with requirements of Section 271(c). That section requires, in part, that RBOCs enter into binding agreements approved under Section 252 of the Act, specifying terms and conditions under which the RBOC is providing access and interconnection to its network facilities for the network facilities of one or more competing providers of telephone service to residential and business subscribers. In addition, Section 120.80(13)(d), Florida Statutes, provides that the Commission can employ processes and procedures as necessary in implementing the Act. Furthermore, Section 364.01, Florida Statutes, provides that the Commission should encourage competition and ensure fair treatment of providers in the market. Therefore, this Commission has jurisdiction in monitoring BellSouth's OSS through third-party testing, which will enable it to consult with the FCC when BellSouth requests 271 approval from the FCC.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission approve additional metrics to be included in the OSS Third-Party Test of BellSouth?

RECOMMENDATION: Yes. Staff recommends that the additional metrics be approved by the Commission for purposes of OSS testing. (HARVEY, VINSON, HALLENSTEIN)

STAFF ANALYSIS: In Order PSC-00-2451-PAA-TP, issued December 20, 2000, the Commission approved a revised set of interim performance metrics to be used during OSS third-party testing. Since this order was issued, BellSouth has implemented additional metrics in other jurisdictions. BellSouth and staff believe these additional metrics should be added to the performance metrics and included in Florida's third-party test to enhance KPMG's ability to evaluate BellSouth's OSS systems.

The proposed new metrics to be added are as follows:

Operations Support Systems
(1)   Loop Make Up - Average Response Time - Manual
(2)   Loop Make Up - Average Response Time - Electronic

Ordering
(3)   Acknowledgment Message Timeliness
(4)   Acknowledge Message Completeness
(5)   Service Inquiry with Local Service Request (LSR) Firm Order Confirmation (FOC) - Response Time Manual
(6)   Firm Order Confirmation and Reject Response Completeness

Provisioning
(7)   Percent Completions/Attempts without Notice or < 24 hours Notice
(8)   Coordinated Customer Conversions - Average Recovery Time
(9)   Hot Cut Conversions - Percent Provisioning Troubles Received Within 7 Days of a Completed Service Order
(10) Service Order Accuracy
(11) Cooperative Acceptance Testing - Percent of xDSL Loops Tested

Maintenance and Repair
(12) Mean Time to Notify CLEC of Network Outages

Billing
(13) Recurring Charge Completeness
(14) Non-recurring Charge Completeness

Database Update Information
(15) Average Database Update Interval
(16) Percent Database Update Accuracy
(17) Percent NXXs and Location Routing Numbers Loaded by the Local Exchange Routing Guide (LERG) Effective Date

Change Management
(18) Notification of Interface Outages

Bona Fide/New Business Request Process (BFR/NBR)
(19) Percentage of BFR/NBR Requests Processed Within 30 Business Days
(20) Percentage of Quotes Provided for Authorized BFR/NBR Requests Processed Within X (10/30/60 Business Days)

KPMG will evaluate the definition, the data integrity and the calculation for each of the 20 metrics listed above as a part of the OSS test. The addition of these metrics will allow KPMG and the Commission to have a more comprehensive set of metrics for purposes of the OSS evaluation. BellSouth has made the necessary programming changes in other states, and staff understands that these additions can be made in Florida in an expeditious manner. Assuming that KPMG can validate and replicate the BellSouth data for these new metrics without the need for retesting, there will be no impact on the OSS test completion date. Based on the foregoing, staff recommends that the Commission approve the additional performance metrics as listed above.

ISSUE 2: Should the Commission approve the revisions to the retail analogs and benchmarks for the purpose of OSS testing?

RECOMMENDATION: Yes. If Issue 1 is approved, staff recommends that the retail analogs and benchmarks shown in Attachment 1 be approved by the Commission for purposes of OSS testing. (HARVEY, VINSON, HALLENSTEIN)

STAFF ANALYSIS: In Order PSC-00-2451-PAA-TP, issued December 20, 2000, the Commission approved a set of retail analogs and benchmarks to specify the level of service BellSouth must provide to ALECs for each of the interim performance metrics to demonstrate nondiscriminatory access to its OSS systems. Since this order was issued, BellSouth has implemented additional retail analogs and benchmarks in other jurisdictions.

As discussed in Issue 1, staff is proposing additional metrics to be added to the interim performance metrics. These additional metrics require corresponding retail analogs and benchmarks. Staff believes these retail analogs and benchmarks should be added to allow for the Commission and KPMG to evaluate BellSouth's performance for the additional metrics.

In addition to these new retail analogs and benchmarks, staff is proposing changes to some existing retail analogs and benchmarks currently included in the interim performance metrics. These changes, for the most part, reflect stricter performance standards required to demonstrate nondiscriminatory access to its OSS systems. These stricter standards have been approved in other states in the BellSouth region, and staff believes BellSouth should be responsible for meeting these same standards in Florida.

The complete set of proposed analogs and benchmarks are included in Attachment 1. The attachment identifies the current and proposed metrics as well as the proposed additions or changes to the benchmarks and analogs. Those items that differ from the analogs and benchmarks previously approved by the Commission are highlighted.

The benchmarks and analogs specify the level of service BellSouth must provide to ALECs for each of the interim metrics in order to demonstrate nondiscriminatory access to it OSS systems. If additional metrics are approved in Issue 1, corresponding analogs and benchmarks will be necessary. Assuming that BellSouth can achieve these standards without the need for retesting, there will be no impact on the OSS test completion date. Based on the foregoing, staff recommends that the Commission approve the additional retail analogs and benchmarks set forth in Attachment 1.

ISSUE 3: Should the Commission approve additional levels of disaggregation for the purposes of OSS testing?

RECOMMENDATION: Yes. Staff recommends that the proposed levels of disaggregation, as shown in Attachment 2, be approved by the Commission. (HARVEY, VINSON, HALLENSTEIN)

STAFF ANALYSIS: In Order PSC-00-2451-PAA-TP, issued December 20, 2000, the Commission approved a revised set of interim performance metrics to be used during the OSS Third-Party Test. For those metrics where a retail analog is used for parity determination, the metrics are further disaggregated by product type to allow for a more detail evaluation and analysis of whether BellSouth provides nondiscriminatory access to BellSouth's OSS systems at a product level. The current and proposed number of levels of disaggregation by domain is as follows:

	Current Number of Levels of Product Disaggregation	Proposed Number of Levels of Product Disaggregation
Ordering	12	22
Provisioning	20	40
Maintenance and Repair	16	20

Attachment 2 shows the specific proposed levels of disaggregation compared to the current levels of disaggregation. Since the Florida Interim Performance Measure order was issued, BellSouth has implemented these additional levels of disaggregation in other jurisdictions. Staff believes these additional levels of disaggregation should also be added to the Florida interim performance metrics to allow the Commission and KPMG to evaluate performance at a more detailed level for purposes of the OSS test.

BellSouth has made the necessary programming changes in other states, and staff understands that these additions can be made in Florida in an expeditious manner. Assuming that KPMG can validate and replicate the BellSouth data for these new levels of disaggregation without the need for retesting, there will be no

impact on the OSS test completion date. Based on the foregoing, staff recommends that the Commission approve the proposed levels of disaggregation set forth in Attachment 2.

ISSUE 4: Should the Commission approve corrections made to the revised interim performance metrics that have resulted from third-party testing in the BellSouth region?

RECOMMENDATION: Yes. Staff recommends that the corrections to the revised interim metrics be approved by the Commission. (HARVEY, VINSON, HALLENSTEIN)

STAFF ANALYSIS: In Order PSC-00-2451-PAA-TP, issued December 20, 2000, the Commission approved a revised set of interim performance metrics to be used during the OSS Third-Party Test. Since this order was issued, KPMG has identified, through the observation and exception process, changes that need to be made to clarify or correct problems with the interim metrics. The changes resulted in corrections to definitions, exclusions, or business rules used to calculate 15 metrics. Additionally, some of these corrections have been included in BellSouth's performance metrics for other states as a result of other audits or third-party testing. Staff believes these corrections should be made to the interim performance metrics in Florida.

The corrections to the interim performance metrics are listed below:

Pre-Ordering/Ordering
In OSS-2, *Interface Availability (Pre-Ordering/Ordering)*, the Definition was clarified; the Exclusions were updated to reflect CLEC impacting troubles and degraded service. The Business Rules clarified "Full Outages" *** (GA Exception 133 / FL Exception 59)**

In OSS-3, *Interface Availability (Maintenance & Repair)*, the Definition was clarified; the Exclusions were updated to reflect CLEC impacting troubles and degraded service. The Business Rules clarified "Full Outages" *** (GA Exception 133 / FL Exception 59)**

Ordering

In O-7, *Percent Rejected Service Requests*, the Business Rules clarified that "Fatal Rejects" are reported for informational purposes only.

In O-8, *Reject Interval*, the Exclusions were updated to include Projects and to reflect excluded hours for Partially Mechanized LSRs. * **(FL Exception 15)**

In O-9, *Firm Order Confirmation Timeliness,* the Exclusions were updated to include Projects and to reflect excluded hours for Partially Mechanized LSRs. * **(FL Exception 15, 36)**

In O-13, *LNP-Percent Rejected Service Requests*, the Exclusions for Fatal Rejects, Order Activities (Record Orders, Test orders, etc) and Non Mechanized LSRs were removed from exclusions. In the Business Rules – Non Mechanized was defined.

In O-14, *LNP-Reject Interval Distribution and Average Reject Interval,* the Exclusions for Fatal Rejects, Certain Order Activities (Record Orders, Test Orders, etc), and Non Mechanized LSRs were removed from exclusions. The Exclusions were updated to include Projects and to reflect excluded hours for Partially Mechanized LSRs. In the Business Rules "Fatal Rejects" are clarified to be reported for informational purposes only.
* **(FL Exception 10, 56)**

In O-15, *LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval,* the Exclusions were updated to include Projects and to reflect excluded hours for Partially Mechanized LSRs and order Activities of BellSouth or CLEC were removed from exclusions (Record Orders, Test Orders). The Business Rules updated to define Fully, Partially, Total and Non Mechanized LSRs. * **(FL Exception 11)**

Provisioning

In P-2, *Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices,* an exclusion was added for Non-Dispatch orders.

In P-3, *Percent Missed Installation Appointments*, the Business Rules were expanded to define the first commitment date.

In P-4, *Average Completion Interval (OCI) & Order Completion Interval Distribution*, the D&F order exclusion was clarified to included Disconnect orders associated with LNP.

In P-5, *Average Completion Notice Interval*, the D&F order exclusion was clarified to included Disconnect orders associated with LNP. The exclusions for Non-mechanized and Partially Mechanized orders were deleted.

In P-7, *Coordinated Customer Conversions Interval*, the Business rules were expanded to explain LNP orders. *** (FL Observation 22)**

In P-12, *LNP Percent Missed Installation Appointments*, the Business Rules were expanded to define the first commitment date. The exclusion for non-mechanized orders was deleted.

In P-14, *LNP Total Service Order Cycle Time*, the Business Rules were expanded to define the interval start time. The exclusion for non-mechanized orders was deleted.

* (The same language has been adopted in other states and the Florida Exception or Observation is referenced where appropriate).

A redline version of the proposed revised interim performance metrics, including the corrections to the business rules, additional metrics, additional analogs and benchmarks, and additional levels of disaggregation, are included in Attachment 3. Attachment 3 also includes minor changes to existing metrics for purposes of clarification and consistency.

BellSouth has made the necessary programming revisions in order to address these changes based on the KPMG observation and exception process. Staff understands that these additions can be made in Florida in an expeditious manner. Assuming that KPMG can validate the specified changes without the need for retesting, there will be no impact on the OSS test completion date. Based on the foregoing, staff recommends that the Commission approve the corrections to the interim performance metrics.

ISSUE 5:   Should these dockets be closed?

RECOMMENDATION: No.   Whether or not the Commission approves staff's recommendations in Issues 1, 2, 3, and 4, these dockets should remain open to address the issues raised in FCCA's Petition for Commission Action to Support Local Competition in BellSouth's Service Territory and BellSouth's compliance with Section 271 of the Act. If the Commission approves staff's recommendations, the Commission's decision on these issues will become final upon issuance of a consummating order if no person whose substantial interests are affected files a timely protest. (Keating)

STAFF ANALYSIS: Whether or not the Commission approves staff's recommendations in Issues 1, 2, 3, and 4, these dockets should remain open to address the issues raised in FCCA's Petition for Commission Action to Support Local Competition in BellSouth's Service Territory and BellSouth's compliance with Section 271.

Proposed
Florida Interim Benchmarks and Analogs

Proposed Florida Interim SQM	Proposed Florida Interim SQM Analog or Benchmarks (Proposed changes to current SQM are shaded Additions to current SQM are shaded)	
OSS Operations Support Systems and (PO) Pre-Ordering		
OSS-1. Average Response Time and Response Interval (Pre-Ordering/Ordering)	Parity + 2 seconds	
OSS-2. Interface Availability (Pre-Ordering/Ordering)	≥ 99.5%	
OSS-3. Interface Availability (Maintenance & Repair)	All Systems except ECTA Parity with Retail ECTA is ≥99.5%	
OSS-4. Response Interval (Maintenance & Repair)	Parity with Retail	
PO-1. Loop Make Up – Average Response Time – Manual	95% in 3 Business Days	
PO-2. Loop Make Up – Average Response Time – Electronic	90% in 5 minutes (95% in 1 min by 08/01/01)	
(O) Ordering		
O-1. Acknowledgement Message Timeliness	EDI: 90% in 30 min (95% in 30 min. by 08/01/01) TAG: 95% in 30 min	
O-2. Acknowledgement Message Completeness	EDI: 100% TAG: 100%	
O-3. Percent Flow-Through Service Requests (Summary)	Resale Residence	95%
	Resale Business	90%
	UNE	85%
	LNP	85%
O-4. Percent Flow-Through Service Requests (Detail)	Resale Residence	95%
	Resale Business	90%
	UNE	85%
	LNP	85%
O-5. Flow-Through Error Analysis	Diagnostic	
O-6. CLEC LSR Information - LSR Flow-Through Matrix	Diagnostic	
O-7. Percent Rejected Service Requests	Diagnostic	
O-8. Reject Interval	Mechanized	97% ≤ 1 hour
	Partially Mechanized	85% ≤ 18 hrs (05/01/01) 85% ≤ 10 hrs (08/01/01)
	Non-Mechanized	85% ≤ 24 hours
	Trunks	85% ≤ 4 days
O-9. Firm Order Confirmation Timeliness	Mechanized	95% ≤ 3 hours
	Partially Mechanized	85% ≤ 18 hrs (05/01/01) 85% ≤10 hrs (08/01/01)
	Non-Mechanized	85% ≤ 36 hours
	Trunks	95% ≤ 10 days
O-10. Service Inquiry Firm Order – Average Response Time	95% Returned in 5 Business days	
O-11. FOC and Reject Response Completeness	95 % Returned	
O-12. Speed /Answer/Ordering Ctr	Parity with Retail	
O-13. LNP-Percent Rejected Service	LNP	Diagnostic

Proposed Florida Interim SQM	Proposed Florida Interim SQM Analog or Benchmarks (Proposed changes to current SQM are shaded Additions to current SQM are shaded)	
Request	UNE loop w/ LNP	
O-14. LNP-Reject Interval Distribution & Average Reject Internal	Mechanized	97% ≤ 1 hour
	Partially Mechanized	85% ≤ 18 hours (05/01/01) 85% ≤ 10 hours (08/01/01)
	Non-Mechanized	85% ≤ 24 hours
O-15. LNP-Firm Order Confirmation Timeliness Interval Distribution & Firm Order Confirmation Average Interval	Mechanized	95% ≤ 3 hours
	Partially Mechanized	85% ≤ 18 hours (05/01/01) 85% ≤ 10 hours (08/01/01)
	Non-Mechanized	85% ≤ 36 hours
(P) Provisioning		
P-1. Mean Held Order Interval & Distribution Intervals	See Attachment 2 for Provisioning Disaggregation and Analog / Benchmark	
P-2. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	Average Jeopardy Notice Interval is 95% ≥ 48 hrs. (Electronic only) See Attachment 2 for Provisioning Disaggregation and Analog / Benchmark	
P-3. Percent Missed Installation Appointments	See Attachment 2 for Provisioning Disaggregation and Analog / Benchmark	
P-4. Average Completion Interval (OCI) & Order Completion Interval Distribution	See Attachment 2 for Provisioning Disaggregation and Analog / Benchmark (Except for UNE xDSL: 7 days w/o conditioning 14 days with conditioning)	
P-5. Average Completion Notice Interval	See Attachment 2 for Provisioning Disaggregation and Analog / Benchmark	
P-6. % Completion Attempts Without Notice or < 24 hours Notice		Diagnostic
P-7. Coordinated Customer Conversions Interval	Unbundled Loops with INP Unbundled Loops with LNP	95% ≤ 15 minutes
P-7A. Coordinated Customer Conversions Hot Cut Timeliness % within Interval and Average Interval	SL1 Time Specific SL1 Non-Time Specific SL2 Time Specific SL2 Non-Time Specific	95% w/in + or – 15 minutes of Scheduled Start
P-7B. Coordinated Customer Conversions – Average Recovery Time	Unbundled Loops with INP Unbundled Loops with LNP	Diagnostic
P-7C. Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 days of a completed Service Order	UNE Loop Design UNE Loop Non-Design Dispatch / Non Dispatch	≤ 5%
P-8. Cooperative Acceptance Testing - % of xDSL Loops Tested	UNE xDSL • ADSL • HDSL • UCL • OTHER	95% of Lines Tested
P-9. % Provisioning Troubles w/in 30 days of Service Order Completion	See Attachment 2 for Provisioning Disaggregation and Analog / Benchmark	
P-10. Total Service Order Cycle Time (TSOCT)	Diagnostic	
P-11. Service Order Accuracy		95% Accurate
P-12. LNP –Percent Missed Installation Appointments	LNP	Retail Residence & Business (POTS)
P-13. LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution	LNP UNE Loop Associated w/ LNP Geographic Scope State, Region	95% ≤ 15 minutes

Proposed Florida Interim SQM	Proposed Florida Interim SQM Analog or Benchmarks (Proposed changes to current SQM are shaded Additions to current SQM are shaded)		
P-14. LNP-Total Service Order Cycle Time	LNP UNE Loop Associated w/ LNP	Diagnostic	
(MR) Maintenance & Repair			
MR-1. Missed Repair Appointments	See Attachmemt 2 for Maintenance Disaggregation and Analog / Benchmark		
MR-2. Customer Trouble Report Rate	See Attachment 2 for Maintenance Disaggregation and Analog / Benchmark		
MR-3. Maintenance Average Duration	See Attachment 2 for Maintenance Disaggregation and Analog / Benchmark		
MR-4. Percent Repeat Troubles within 30 days	See Attachment 2 for Maintenance Disaggregation and Analog / Benchmark		
MR-5. Out of Service > 24 Hours	See Attachment 2 for Maintenance Disaggregation and Analog / Benchmark		
MR-6. Average Answer Time – Repair Centers	Parity with Retail		
MR-7. Meantime to Notify CLEC of Network Outages	Parity by Design		
(B) Billing			
B-1. Invoice Accuracy	Parity with Retail		
B-2. Mean Time to Deliver Invoices	Parity with Retail		
B-3. Usage Data Delivery Accuracy	Parity with Retail		
B-4. Usage Data Delivery Completeness	Parity with Retail		
B-5. Usage Data Delivery Timeliness	Parity with Retail		
B-6. Mean Time to Deliver Usage	Parity with Retail		
B-7. Recurring Charge Completeness	Resale UNE Interconnection	Parity 90% 90%	
B-8. Non-recurring Charge Completeness	Resale UNE Interconnection	Parity 90% 90%	
(OS) (DA) Operator Services			
OS-1. Speed to Answer Performance/Average Speed to Answer (Toll)	Parity by Design		
OS-2. Speed to Answer Performance/Percent Answered within "X" Seconds (Toll)	Parity by Design		
DA-1. Speed to Answer Performance/Average Speed to Answer (DA)	Parity by Design		
DA-2. Speed to Answer Performance/Percent Answered within "X" Seconds (DA)	Parity by Design		
(D) Database Update Information			
D-1. Database Update - Interval and Average Interval	Database Type • LIDB • Directory Listings • Directory	Parity by Design	
D-2. Database Update - % Accuracy	Database Type • LIDB • Directory Listings • Directory	Parity by Design	
D-3. NXX and LRNs Loaded by LERG Effective Date	100% by LERG Effective Date		
(E) E911			
E-1. Timeliness	Parity by Design		

Proposed Florida Interim SQM	Proposed Florida Interim SQM Analog or Benchmarks (Proposed changes to current SQM are shaded Additions to current SQM are shaded)		
E-2. Accuracy	Parity by Design		
E-3. Mean Interval	Parity by Design		
(TGP) Trunk Group Performance			
TGP-1. Trunk Group Performance-Aggregate	CLEC Aggregate BST Aggregate	Parity with Retail	Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs and 9 for BST.
TGP-2. Trunk Group Performance-CLEC Specific	CLEC Trunk Group BST Trunk Group	Parity with Retail	Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% using trunk groups 1,3,4,5,10,16 for CLECs and 9 for BST.
Deleted TGP 3-4			
(C) Collocation			
C-1. Average Response Time	Virtual – 15 Calendar Days Physical – 15 Calendar Days		
C-2. Average Arrangement Time	Virtual – 60 Calendar Days (Ordinary) Virtual Augment (with space increase) – 90 Calendar Days Virtual Augment (without space increase) – 45 Calendar Days Physical – 90 Calendar Days Physical Augment (with space increase) – 90 Calendar Days Physical Augment (without space increase) – 45 Calendar Days		
C-3. % of Due Dates Missed	95% ≤ Commit Date (Virtual & Physical)		
(CM) Change Management			
CM-1. Timeliness of Change Management Notices	98% on Time		
CM-2. Change Management Notices Average Delay Days	90% ≤ 5 days		
CM-3. Timeliness of Documents Associated with Change	98% on Time		
CM-4. Change Management Documentation Average Delay Days	90% ≤ 5 days		
CM-5. Notification of Interface Outage	97% ≤ 15 minutes		
(BFR) Bona Fide/New Business Request Process			
BFR-1. % Of BFR/NBR Requests Processed within 30 Business Days	90% ≤ 30 Business days		
BFR-2. % Of Quotes Provided for Authorized BFR/NBR Requests Processed within X (10, 30, 60) Business Days	90% ≤ 10/30/60 Business days - Network Elements that are operational at the time of request – 10 days - Network elements that are Ordered by the FCC – 30 days - New Network Elements – 90 days		

Attachment 2
Current and Proposed
Florida Interim Level of Disaggregation and Retail Analogs

Proposed Disaggregation	Proposed Benchmark / Analogs	Current Disaggregation	Current Benchmark / Analogs (Attachment II)
Ordering	Ordering	Ordering	Ordering
Mechanized, Partially Mechanized and Non-Mechanized	Appropriate Benchmark (See Atttachment 1)	Mechanized, Partially Mechanized and Non-Mechanized	Appropriate Benchmark (See Attachment 1)

Resale – Residence
Resale – Business
Resale – Design (Special)
Resale PBX
Resale Centrex
Resale ISDN
2W Analog Loop Design
2W Analog Loop Non-Design
2W Analog Loop w/INP Design
2W Analog Loop w/INP Non-Design
2W Analog Loop w/LNP Design
2W Analog Loop w/LNP Non-Design
UNE xDSL (ADSL, HDSL, UCL)
Line Sharing
INP Standalone
LNP Standalone
 	
Switch Ports
Loop + Port Combinations
Local Transport
UNE Other Non-Design
UNE Other Design
Local Interconnection Trunks
		Resale – Residence
		Resale – Business
		Resale – Design (Special)
		Other
		UNE
		UNE Design
		UNE Non-Design
		UNE Loop with NP
		UNE Loop without NP
		Interconnection Trunks
		   • < 10 Circuits / Lines
		   • > 10 Circuits / Lines	

Proposed Disaggregation	Proposed Benchmark / Analogs	Current Disaggregation	Current Benchmark / Analogs (Attachment II)
Provisioning	Provisioning	Provisioning	Provisioning
Resale Residence	Retail Residence	Resale Residence	Retail Residence
Resale Business	Retail Business	Resale Business	Retail Business
Resale Design	Retail Design	Resale Design	Retail Design
Resale PBX	Retail PBX	Resale PBX	Retail PBX
Resale Centrex	Retail Centrex	Resale Centrex	Retail Centrex
Resale ISDN	Retail ISDN	Resale ISDN	Resale ISDN
LNP (Standalone)	Retail Res & Bus POTS	UNE Loop and Port Combos	Retail Residence and Business
INP (Standalone)	Retail Res & Bus POTS	UNE 2W Loop with NP – Non-Design	Retail Residence and Business
2W Analog Loop Design	Retail Res & Bus (Dispatch)	UNE 2W Loop without NP – Non-Design	Retail Residence and Business
2W Analog Loop Non Design	Retail Res & Bus (POTS excluding Sw Based)	UNE 2W Loop Other with NP – Non-Design	Retail Residence and Business
• Dispatch	• Dispatch	UNE 2W Loop Other without NP – Non-Design	Retail Residence and Business
• Non-Dispatch (Dispatch In)	• Non-Dispatch (Dispatch In)	UNE Other Non – Design	Retail Residence and Business Retail
2W Analog Loop w/LNP Design	Retail Res & Bus Dispatch	UNE 2W Loop with NP – Design	Residence and Business
2W Analog Loop w/LNP Non-Design	Retail Res & Bus POTS excluding Sw Based	UNE 2W Loop without NP – Design	Retail Residence and Business
• Dispatch	• Dispatch	UNE 2W Loop Other with NP – Design	Retail Design
• Non-Dispatch (Dispatch In)	• Non-Dispatch (Dispatch In)	UNE 2W Loop Other without NP – Design	Retail Design
2W Analog Loop w/INP Design	Retail Res & Bus Dispatch	UNE Other Design	Retail Design
2W Analog Loop w/INP Non-Design	Retail Res & Bus POTS excluding Sw Based		
• Dispatch	• Dispatch	Local Interconnection Trunks	Parity with Retail
• Non-Dispatch (Dispatch In)	• Non-Dispatch (Dispatch In)	Switching	Retail POTS
UNE Digital Loop < DS1	Retail Digital Service < DS1	Local Transport	Retail DS1/DS3
UNE Digital Loop >= DS1	Retail Digital Service >= DS1		
UNE Loop+ Port Combinations	Retail Res & Bus		
• Dispatch Out	• Dispatch Out		
• Non-Dispatch	• Non-Dispatch		
• Dispatch In	• Dispatch In		
• Switch-Based	• Switch-Based		
UNE Switch ports	Retail Res & Bus (POTS)		
UNE Combo Other	Retail Res, Bus & Design Dispatch		
• Dispatch	• Dispatch		
• Non-Dispatch (Dispatch In)	• Non-Dispatch (Dispatch In)		

Proposed Disaggregation	Proposed Benchmark / Analogs	Current Disaggregation	Current Benchmark / Analogs (Attachment II)
Provisioning	Provisioning	Provisioning	Provisioning
UNE xDSL (HDSL, ADSL and UCL)	ADSL provided to Retail		
UNE xDSL (HDSL, ADSL and UCL) W/o conditioning (P-4 only)	7 Days		
UNE xDSL (HDSL, ADSL and UCL) W/o conditioning (P-4 only)	14 Days		
UNE ISDN	Retail ISDN BRI		
UNE Line Sharing	ADSL provided to Retail		
UNE Other Design	Retail Design		
UNE Other Non – Design	Retail Residence and Business		
Local Transport (Unbundled Interoffice Trans port)	Retail DS1/DS3 Interoffice		
Local Interconnection Trunks	Parity with Retail		

Proposed Disaggregation	Proposed Benchmark / Analogs	Current Disaggregation	Current Benchmark / Analogs (Attachment II)
Maintenance & Repair	**Maintenance & Repair**	**Maintenance & Repair**	**Maintenance & Repair**
Resale Residence	Retail Residence	Resale Residence	Retail Residence
Resale Business	Retail Business	Resale Business	Retail Business
Resale Design	Retail Design	Resale Design	Retail Design
Resale PBX	Retail PBX	Resale PBX	Retail PBX
Resale Centrex	Retail Centrex	Resale Centrex	Retail Centrex
Resale ISDN	Retail ISDN	Resale ISDN	Retail ISDN
LNP (Standalone) (Not Available in Maintenance)	Not Applicable	UNE Loop + Port Combos	Retail Residence & Business
		UNE 2W Loop – Non-Design	Retail Residence & Business
2W Analog Loop Design	Retail Residence & Business Dispatch	UNE Loop Other – Non-Design	Retail Residence & Business
2W Analog Loop Non – Design	Retail Residence & Business (POTS)	UNE Other – Non-Design	Retail Residence & Business
UNE Loop + Port Combinations	Retail Residence & Business	UNE 2W Loop – Design	Retail Residence & Business
UNE Switch ports	Retail Residence & Business (POTS)	UNE Loop Other – Design	Retail Design
UNE Combo Other	Retail Residence & Business and Design Dispatch	UNE Other Design	Retail Design
		Local Interconnection Trunks	Parity with Retail
UNE XDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail	Switching	Retail POTS
UNE ISDN	Retail ISDN - BRI	Local Transport	Retail DS1/DS3
UNE Line Sharing	ADSL Provided to Retail		
UNE Other Design	Retail Design		
UNE Other Non – Design	Retail Residence & Business		
Local Interconnection Trunks	Parity with Retail		
Local Transport (Unbundled Interoffice Transport)	Retail DS1/DS3		

Attachment 3 will be late filed on June 1, 2001 by 1:00 p.m.