

**ORIGINAL**

July 9, 2001

**BY HAND DELIVERY**

Blanca Bayó  
Florida Public Service Commission  
Division of Regulatory Oversight  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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JUL -9 PM 1:29  
COMMISSION  
CLERK

Re: Docket No. 981834 and 960786 – Comments to Revisions to Metrics

Dear Ms. Bayó,

Enclosed for filing in the above-referenced docket are the original and one copy of WorldCom's comments to the revised interim metrics.

Thank you for your assistance with this matter.

Sincerely,

Donna Canzano McNulty

cc: Lisa Harvey  
KPMG

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FPSC-RECORDS/REPORTING

WorldCom believes the performance metrics part of any OSS Third-Party Test should validate the metrics that ALECs are going to have to use for protection. It is important that the metrics be tested in their final form, including business rules, benchmarks and disaggregation. In addition, WorldCom has concerns about some of the business rules for new metrics and changed metrics that were not recommended by KPMG or the Georgia PSC as BellSouth may represent. At a minimum, the business rules should only be modified to reflect changes endorsed by ALECs or resulting from a regulatory directive made after reviewing ALECs' concerns.

Some of WorldCom's concerns regarding the revised metrics are set forth as follows:

- OSS-2** The proposed exclusions are not well defined. Factors outside BellSouth's control may have a broad definition and include problems caused by a third-party vendor acting as BellSouth's agent. Further degraded service should not be excluded, because the failure of OSS-1 to include time-outs would not capture this problem for pre-order queries. Even with time-outs, it would not capture slow downs of ordering systems. WorldCom is particularly concerned that BellSouth will define non-critical functionality more liberally than the ALECs would. BellSouth must more precisely define the first exclusion and eliminate the second.
- OSS-3** Same as above.
- PO-2** As for scheduled maintenance exclusions, prime business hours for ALECs should not be excluded from the metric. Maintenance should be conducted very late in the evening, after midnight, so as not to disrupt the ALECs prime business hours from 5 p.m. to 9 p.m. Further, BellSouth needs to develop a way to identify when and whether acknowledgements were received on an-ALEC specific basis.
- O-1 & 2** See above.
- O-3** Again, scheduled maintenance exclusions should never occur during ALEC prime hours of 5 p.m. to 9 p.m. Also, z status orders should not be excluded. BellSouth should be reducing rather than adding to manual fallout list. BellSouth should flow through orders in pending-order status as Verizon does now.
- O-4** Same concern about maintenance and z status orders.
- O-7** Again, maintenance should not be scheduled during ALEC prime hours of operation.
- O-8** Projects should be included, but perhaps disaggregated.

- O-9** Same as above. Non-business hours should not be excluded, especially for mechanized orders.
- O-10** See scheduled maintenance issue.
- O-11** See scheduled maintenance issue. Non-mechanized orders should not be excluded.
- O-13** See scheduled maintenance issue.
- O-14** Projects should be included but listed separately. See scheduled maintenance issue.
- O-15** See projects and scheduled maintenance issues.
- P-1** Orders for rural areas should not be excluded. Appropriate disaggregation will pick up geographic differences.
- P-2** Jeopardies should be provided on non-dispatch orders as well. Eliminate exclusion.
- P-5** Business rule is not clear on how retail analog for completion notice is measured and should be clarified.
- P-7** This metric should be measured starting at the receipt of number ported message.
- P-7A** End-time for cutover must be met for this to be a meaningful metric.
- P-8** BellSouth should define “successful.” It appears not to mean the loop is working, but only that BellSouth showed up to perform the test.
- P-11** KPMG should define the process and pick the sample size for each product to test order accuracy. The sample size should include only Florida orders for the P-11 metric. Long-term plan should be developed for electronic comparison of LSRC to fielded completion notice when available to check all orders.
- P-12** Subsequent missed appointments that are BellSouth's fault should be included as well.
- O S-1** KPMG should review parity by design claim and at a minimum, apply the end-user standard.
- D-2** KPMG must define “statistically valid” and describe the appropriate non-biased process for selecting a sample.

- D-3** BellSouth must not tie meeting on time delivery to delayed interconnection trunks, where it may be responsible for the delay. Only NXXs and LRNs delivered by LERG effective date should be considered delivered on time. Otherwise, BellSouth could delay delivering interconnection trunks thereby giving itself more time to load NXXs and LRNs. Both the trunking and the NXX delay could impact an ALEC's ability to launch on time and begin receiving revenues in new markets. This metric should measure on-time performance for emergency requests separately rather than excluding such requests from this metric.
- TPG- 1** Exclusions for ALEC-caused issues should have electronic confirmation from the ALEC accepting claims of fault. Exclusion for unanticipated increases in traffic should be excluded. Trunks should be engineered to deal with some unexpected spikes in retail or ALEC traffic. Last exclusion is unnecessary because overflowing trunks do not meet definition of final trunk group.
- TPG-2** See above.
- CM-1** Exclusions should be eliminated. Any change notice with an interval should be included, even if the interval is an emergency one that only requires release before the change.
- CM-2** See above.
- CM-3** See above. Even slips due to responding to an ALEC's request for changes requires advance notice so that the ALEC knows changes were accepted and it can build to them.