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COMMISSION
CLERK

September 25, 2001

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

Re: Docket No. 000121-TP (OSS)

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s Motion for Reconsideration and Clarification, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver
J. Phillip Carver (KA)

Enclosures

cc: All parties of record
Marshall M. Criser, III
Nancy B. White
R. Douglas Lackey

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**CERTIFICATE OF SERVICE
Docket No. 000121-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
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**(+) Signed Protective
Agreement**

#237366

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the) Docket No. 000121-TP
Establishment of Operations Support)
Systems Permanent Performance)
Measures for Incumbent Local Exchange)
Telecommunications Companies) Filed: September 25, 2001
_____)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR RECONSIDERATION AND CLARIFICATION**

BellSouth Telecommunications, Inc. (“BellSouth”), hereby files, pursuant to Rule 22.060(1), Florida Administrative Code its Motion for Reconsideration and Clarification by the Florida Public Service Commission (“Commission”) of Order No. PSC-01-1819-FOF-TP (“Order”) issued September 10, 2001. In support thereof, BellSouth states the following:

1. In some cases, the Order is in need of clarification for the reasons described below. Other portions of the Commission’s Order should be reconsidered because the Order is premised upon fundamental error relating to matters that the Commission appears to have overlooked or failed to consider.¹

2. The controlling cases for the resolution of motions for reconsideration, which are frequently cited by this Commission, are Diamond Cab Co. of Miami v. King, 146 So 2d 889 (Fla. 1962), Stewart Bonded Warehouse, Inc. v. Beavis, 294 So 2d 315 (Fla. 1974) and Pingree v. Quaintance, 394 So 2d 161 (Fla. First DCA 1981)² “In

¹ BellSouth has restricted this motion to matters appropriately addressed as issues for clarification or reconsideration. The SQM and SEEM plan are evolving documents, however, to which changes and enhancements should be made on an ongoing basis. Consistent with this, there are certain necessary changes that are not discussed in this motion, but which should be made. BellSouth will identify these proposed changes through appropriate future filings.

² See, for example, the standard of review described in a number of recent Commission decisions (Order Nos. PSC-99-0047-FOF-TP, PSC-99-0081-FOF-TP, and PSC-99-0582-FOF-TP).

Diamond Cab, the Florida Supreme Court declared that the purpose of the petition for reconsideration is to bring to an agency's attention a point of law or fact which it overlooked or failed to consider when it rendered its order." (Order No. PSC-99-0081-FOF-TP, Page 2).

The Commission Should Reconsider its Rulings Relating to the Benchmarks to be Applied to Measurements.

3. The Order recites the contention of the ALEC Coalition that BellSouth has proposed benchmarks below the 95% or higher thresholds that have been set in other states, such as New York and Texas. (p. 35). The Order also recites the position of BellSouth that "while BellSouth agrees with the principle that simply having another state approve something does not necessarily make it appropriate for Florida to approve, the fact that Georgia has approved these analogs and benchmarks should bear some weight." (p. 37). The Order, however, does not state which approach the Commission adopted, or the evidence upon which it based its conclusions as to the particular benchmark level that is appropriate for each measurement. Instead, the Order states only that the approved standards are displayed in Attachment 5 (p. 41). This Attachment, however, provides no rationale for the standards adopted. Attachment 3 does provide a cursory explanation in matrix form of the benchmark ordered for some measurements, but it provides no clue as to the specific evidence relied upon or the rationale used by the Commission in reaching the specific decisions set forth in that Attachment as to benchmark levels.

4. Further, a measure by measure review of the decisions explained in Attachment 3 only prompts further confusion. To give a few examples, for measurement 0-10 (Service Inquiry with LSR Firm Order Confirmation, Response Time Manual), the

ALECs proposed a benchmark of 95% in three days. The Commission approved a standard of 95% in five business days and, in rejecting the ALEC proposal, stated that “we have no evidence to support a change at this time.” (p. 40). The reference to a “change” is obviously meant to mean a change from the benchmark proposed by BellSouth. Likewise, for the measurement P-7 (Cooperative Acceptance Testing—Percentage of xDSL Loops Tested), the ALECs proposed a benchmark of 99.5%. The Commission rejected this benchmark, again stating that it had “no evidence to support an increase to the benchmark at this time” (p. 56). On the other hand, the Commission ruled on CM-2 (Average Delay Days for Change Management Notices) by noting that the ALECs had proposed a benchmark of 95% in five days, and then stating that “we agree that the proposed benchmark of 95% in five days is appropriate.” (p. 61). This cursory statement, however, does not cite to any evidence that was relied upon to reach this decision, and it gives no insight into why the Commission determined the interval proposed by the ALECs to be appropriate. Also, for the measurement C-3 (Collocation Percent Due Dates Missed), the ALECs proposed what amounts to a benchmark of 100%. The Commission, instead, approved a benchmark of 95%, and stated that “Texas uses this same standard.” (p. 60). Why the Texas standard was deemed appropriate, as opposed to that Ordered in Georgia, Louisiana, New York or any other state, is not disclosed.

5. Taken together, the examples set forth above show that the benchmark levels selected varied widely. In some instances, BellSouth’s proposals were accepted, in other instances the ALEC’s proposals were accepted, and in some instances, the decision is to select a benchmark level somewhere in between. BellSouth believes it would be more appropriate to use the interim benchmarks, and consider changes at the six month

review. On the face of the Order, however, there is no indication of any evidentiary basis for rejecting any of the benchmarks proposed by BellSouth. Further, a review of the evidence demonstrates that there is no basis for such a decision.

6. The specific benchmark values that MCI's Ms. Kinard advocated on behalf of the ALECs were not substantively supported in her testimony. At the hearing, Ms. Kinard admitted that the ALEC's have no study or analysis to support the claim that a 95% benchmark (or for the matter any other minimum benchmark) is necessary to allow the ALECs "a meaningful opportunity to compete." (Tr. 181). Thus, to the extent that the Commission has relied on the ALECs unsupported opinions to set benchmarks at the levels advocated by the ALECs, there is no evidence to support this decision. Moreover, Ms. Kinard could justify the benchmarks proposed by the ALECs only by claiming that they were based on decisions in other states, such as Texas or New York (Tr. 181). She also claimed during cross examination that the fact that higher benchmarks than those proposed by BellSouth have been ordered in other states demonstrates "that other ILECs can meet these standards." (Tr. 182). As BellSouth noted in its Brief, Ms. Kinard apparently took the view that benchmarks should be set at the outer edge of an ILEC's (apparently any ILECs) abilities. This is, of course, not the legal standard that applies. This Commission specifically determined (consistent with past FCC decisions) that "for those functions that have no retail analog, BellSouth shall provide access that would offer an efficient carrier a meaningful opportunity to compete." (p.148). The fact that an extremely high benchmark could possibly be met does not mean that the benchmark is necessary to provide a meaningful opportunity to compete.

7. Moreover, even if there were merit to Ms. Kinard's view that the highest possible benchmark should be ordered, there is no evidence in the record to demonstrate that the ALEC-proposed benchmarks can be met. First, all parties agree that BellSouth's OSS systems are different than those used in Texas, New York, or other states that are served by ILECs other than BellSouth. Thus, even if we accept Ms. Kinard's testimony that the orders in those states outside of BellSouth's region can somehow show "what is possible," it is clear that they can only demonstrate "what is possible" using the systems of those other carriers. The ALECs did not advocate benchmarks approved by any Commission in BellSouth's region, i.e., a Commission that based its decisions upon a consideration of the specific OSS that BellSouth utilizes. Even if a benchmark were deemed achievable using the OSS of Verizon or SBC, those systems are not necessarily comparable to BellSouth's systems. For this reason, it makes little sense to rely on benchmarks adopted outside BellSouth's region as if the OSS systems were comparable. Moreover, it is error to do so when there is no evidence to support this result.

8. Further, just because a Commission in some state has ordered a benchmark does not necessarily mean that it is achievable. No doubt, some benchmarks have been (and will be) ordered that, at some future point, will be deemed to be unreasonably high. It is noteworthy that, although the respective New York and Texas plans have been in effect for quite some time, there was no evidence submitted by the ALECs that the high benchmarks they advocate have actually been achieved by any ILEC in any state.

9. Finally, despite Ms. Kinard's general statements that the ALEC-proposed benchmarks are based on other states, the reality is that the ALEC-proposed benchmarks

were considerably higher than what has been proposed anywhere. For example, the ALEC plan has thirteen benchmarks that were set at a 100%, i.e., perfection. In a recent proceeding in South Carolina, Ms. Kinard admitted on cross examination that this is the case, that these constitute approximately 30% of the ALEC benchmarks, and that no state anywhere has ordered benchmarks this high. (A copy of the transcript of this portion of the South Carolina proceeding is attached as Exhibit A)³ Of course, the Florida Commission rejected many of the ALEC's extremely high benchmarks in the subject Order, which certainly indicates that this Commission did not rely totally on the opinions of ALEC witnesses or their claimed reliance on the decisions of states outside BellSouth's region. What is not clear on the record is the rationale behind accepting the ALEC's high proposed benchmarks in those instances in which the Commission decided to do so. Again, BellSouth submits that there is no evidence to support this result.

10. BellSouth, of course, proposed that this Commission adopt the same benchmarks as those approved by the Georgia Commission. As Mr. Coon testified, these were based on a great deal of study, ALEC input, and other analysis done over the past several years in both Louisiana and Georgia. Although BellSouth believes, as it stated in Mr. Coon's testimony, that the Florida Commission should not unquestioningly adopt the results in any state, it certainly makes more sense (if the Commission is inclined to consider the decisions of other states) to look to the states that have reviewed BellSouth's OSS systems, and adopted standards that have been found to be appropriate for

³ Since Ms. Kinard's admission occurred in South Carolina, it can obviously not be considered as evidence in this proceeding. However, a review of the evidence that the ALECs did submit demonstrates that the ALEC plan presented in Florida, which is the same as the plan presented in South Carolina, has this same, extremely large number of benchmarks set at 100%.

BellSouth's systems. There is no basis to rely on State Commissions whose decisions reflect what they deem to be appropriate for other OSS, other regions, and other ILECs.

11. Finally, BellSouth would note that the Georgia Commission-approved measurements, the BellSouth proposed measurements, and the measurements utilized by this Commission on an interim basis for third party testing are generally consistent. Although, admittedly, the interim measurements do not reflect a permanent decision as to the appropriate standards, the interim adoption of these standards do reflect a judgment that they are sufficient for the third party testing that will be utilized as a crucial part of determining whether BellSouth is providing nondiscriminatory service. The benchmarks set forth in the instant Order are considerably higher than the interim standards. The instant Order provides no indication, however, of why these earlier standards have been rejected, or why the Commission deems it appropriate to raise them, in some cases, substantially.

12. For all of the reasons set forth above, the Commission should reconsider the benchmarks set in this proceeding, and lower the applicable benchmarks to the levels advocated by BellSouth, adopted by this Commission on an interim basis, and previously ordered by the Georgia Commission.

The Commission should Clarify its Ruling Regarding the Number of Measures in the Enforcement Plan.

13. The Order states that Attachment 7 to the Order contains the approved levels of disaggregation, and estimates this disaggregation amounts to “over 825 levels of disaggregation for compliance reporting and penalties for Tier 1 and over 875 total levels of disaggregation for compliance reporting and penalties for Tier 2.” (p. 102). BellSouth has gone through Attachment 7 and counted the number of disaggregated measures that

appear, and has only been able to identify approximately 250 sub-metrics. Subsequent to this initial effort, BellSouth has tried to apply other possible disaggregation suggested by the language of the Order to these 250 categories, but it has been unable to find any combination of assumptions that yields approximately 850 sub-metrics for each Tier.

14. Obviously, BellSouth cannot revise and submit an enforcement plan as directed by the Commission (and as will be discussed further below) without additional information that will allow it to specifically identify the disaggregation submeasures to which the Commission intends for penalties to apply. Therefore, BellSouth requests that the Commission clarify its Order by identifying with specificity the sub-metrics it has ordered, so that BellSouth can implement an enforcement plan in keeping with the parameters specified in the Order.

The Commission Should Clarify the Procedure for Plan Approval

15. BellSouth requests clarification or reconsideration of the procedure to be followed as this case continues. The Order states that BellSouth shall “file a revised performance plan within 45 days of the Final Order,” and that the Staff shall have administrative authority to approve the performance assessment plan and enforcement mechanism if it complies with the Final Order in this docket. (p. 141). Consistent with this, an Ordering Clause (p. 202) provides that BellSouth shall develop a plan that will include, among other things, an average penalty of approximately \$2500 per measure, but vary from measure to measure as appropriate.

16. Although BellSouth understands the reasons behind the Commission’s decision to take this approach, the language quoted above leaves a considerable range of possibilities as to the substance of the enforcement plan to be implemented at the end of

this process. For example, the uncertainty noted above as to whether there are really 250 disaggregated sub-metrics for each Tier, approximately 850, or somewhere in between must be resolved since the average penalty of \$2500 will be applied to each sub-metric, whatever the final number of sub-metrics ultimately turns out to be. In other words, there is a great deal still to be resolved in this proceeding, and while BellSouth does not object to the review of BellSouth's future proposed plan being delegated to Staff, this does raise concerns.

17. First, BellSouth assumes that the Staff's delegated authority will be only to approve the proposal BellSouth makes as consistent with the Order, or to reject it as inconsistent. BellSouth hereby requests a clarification that the Staff will not be able to, in effect, "order" specific changes to the proposed plan in the same way that the Commission would at the conclusion of a hearing.

18. Beyond this, BellSouth has an additional concern. The Order recites that the Commission has deferred for now resolving the question of whether it has the legal authority to impose an enforcement mechanism (i.e., liquidated damages) upon BellSouth without its consent (p. 121). The stated basis is that, given the fact that BellSouth may consent to the enforcement plan ultimately ordered by the Commission (in this case, by virtue of an administrative function of Staff), there may be no need to address the issue. (Id.). The difficulty is that BellSouth cannot know whether it ultimately consents to what the Commission decides via Staff until after this decision has been made. However, at the future point at which this occurs and BellSouth has adequate information to know whether it can consent to the plan, the time for appealing the Final Order will have long since passed. Further, the procedure contemplated by the Commission does not appear to

involve the entry of a Commission Order approving the Staff's decision that could be appealed. In addition, depending on the complexity of the design, BellSouth may not be able to implement the plan in the ninety days ordered because of the required hardware and programming.

19. Clearly, BellSouth could make a decision now to appeal the Final Order, but there is really no point in BellSouth's having to take this action merely to preserve its rights, when, after a subsequent review of the final decision of the Commission, BellSouth may be able to consent. However, given the current procedure contemplated by the Order, this would appear to be BellSouth's only alternative to giving up any ability it might have to challenging a final enforcement plan that it might later determine it cannot accept. Therefore, BellSouth respectfully requests the Commission to clarify its Final Order to state that at the time the final Staff decision is made as to whether the BellSouth proposed plan is acceptable, a Supplement Final Order will be entered that will reflect this decision and that can be appealed by any affected party.

Other Issues

20. In addition to the general basis for reconsideration set forth above, BellSouth requests reconsideration or clarification on certain particular measures:

21. P-3: Percent Missed Installation Appointments. The Order notes the ALEC's position that BellSouth includes only misses of an original appointment, and if a subsequent appointment is rescheduled and also missed, BellSouth does not report this (p. 51). The Commission accepted this argument by the ALECs and stated that "subsequent missed appointments shall be included in the calculation of this metric." (Id.). BellSouth

requests that the Commission reconsider this decision, and find that these subsequent appointments (whether missed or made) should not be included.

22. Subsequent missed appointments are captured by BellSouth's proposed measurements, albeit not in a direct way. The Order Completion Interval measurement and the Total Service Order Cycle Time necessarily become longer if any order is missed. Thus, even if subsequent missed appointments are excluded from P-3, they will still be reflected in the resulting longer provisioning interval captured by the above-noted measurements.

23. The business rule ordered by the Commission creates several administrative questions. It is unclear whether subsequent appointments that are made should count in the calculation as well as subsequent misses. It is also unclear whether a subsequent appointment that is missed due to reasons outside of BellSouth's control (such as the customer not providing access) should be counted as BellSouth misses.

24. BellSouth believes that because the calculation in question is the same for BellSouth and for service to ALECs, because failures to meet subsequent appointments are reflected in the interval measurements, and because of the administrative issues noted above, the Commission should reconsider its judgment as to this business rule and approve the exception originally requested by BellSouth.

25. 0-9: Firm Order Confirmation Timeliness. BellSouth requests reconsideration of the change in the business rule that would require BellSouth to check the availability of facilities prior to providing the Firm Order Confirmation ("FOC"). This measurement utilizes a benchmark rather than a retail analog because there is nothing in BellSouth's processing of orders comparable to the return of an FOC.

However, certain aspects of BellSouth's ordering process and the ALEC ordering process are comparable. When performing the ordering process in its retail operations, BellSouth does not do a facilities check. If facilities are, in fact, unavailable, this is subsequently determined, but not necessarily within the timeframe in which, in the comparable process for ALECs, an FOC would be returned. Thus, this change in the business rule would require BellSouth to provide service to the ALEC that is superior to what it provides to itself. Given the fact that the goal is to provide parity service, BellSouth asserts that it is not appropriate to add this additional requirement.

26. Also, even if it were appropriate to take this action, the interval should be adjusted (i.e., lengthened) in light of the addition of this time consuming task. BellSouth has already discussed the reasons that it believes the Commission's decision to raise benchmarks is unjustified. In this case, the Commission has not only added a time consuming task to be performed within the designated interval for all orders, it has also shortened the proposed interval and raised the benchmark for partially mechanized and non-mechanized orders. This combination of changes makes the Commission-imposed standard for this measurement, at best, extremely difficult to achieve.

27. C-2: Collocation Average Arrangement Time. BellSouth requests reconsideration of the change to the business rule by which the Commission ordered a collocation should not be considered complete for the purposes of this measurement until the ALEC accepts the collocation. (p. 60). BellSouth believes, as a general proposition, that it is inappropriate to hold it responsible for meeting any measurement in which a portion of the process being measured is outside of its control. This is an example of such a situation, and one in which the possibilities of abuse are particularly egregious.

With this change in the business rule, an ALEC could elect to simply delay acceptance of the collocation arrangement until after the required interval. This would provide a virtual invitation to ALECs to “game” the system.

28. Also, any penalties that are produced by improper ALEC action would be in addition to penalties arising from delays in ALEC acceptance of collocation arrangements that are the result of legitimate operational issues, but which are in no way the fault of BellSouth. To give an example, BellSouth has attached hereto as Exhibit “B” a multi-page document (that has been redacted so as not to disclose the identity of collocators) that shows numerous instances in which collocation space has been ready for ALEC acceptance long before it was actually accepted. A review of this document shows that of these particular illustrative instances, the shortest number of days between space readiness and acceptance is eight, and the longest is 733, i.e., slightly longer than two years.

29. Again, these are examples of instances in which acceptance has been delayed for extremely long periods of time in the current environment, that is, when there are no payments being made to ALECs who delay collocation acceptance. If the Commission creates a situation in which delaying acceptance (a decision totally within the discretion of the ALEC) will be rewarded with the improper payment of an automatic penalty, then these numbers will almost certainly increase substantially, and BellSouth will pay penalties, even though there is absolutely no failure on its part to render appropriate performance.

CONCLUSION

For the reasons set forth above, BellSouth respectfully requests reconsideration and/or clarification as described above.

Respectfully submitted this 25th day of September, 2001.

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COUNSEL FOR BELLSOUTH
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412057

1 BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION
2 DOCKET NO. 2001-209-C

3 BELLSOUTH TELECOMMUNICATIONS, INC.,

4 Applicant,
5 and

6 VOLUME XI

7 AT&T OF THE SOUTHERN STATES, INC.,
8 UNITED TELEPHONE COMPANY OF THE CAROLINAS
9 and SPRINT COMMUNICATIONS COMPANY,
10 SOUTH CAROLINA CABLE TELEVISION ASSOCIATION,
11 NEWSOUTH COMMUNICATIONS CORP., US LEC OF SOUTH
12 CAROLINA, INC., RESORT HOSPITALITY SERVICES, INC.,
13 MCI WORLDCOM COMMUNICATIONS, INC., MCI WORLDCOM
NETWORK SERVICES, INC., and MCImetro ACCESS
TRANSMISSION SERVICES, LLC (collectively "WorldCom"),
ACCESS INTEGRATED NETWORKS, INC., SOUTHEASTERN
COMPETITIVE CARRIERS ASSOCIATION, NUVOX
COMMUNICATIONS, INC., ITC^DELTACOM COMMUNICATIONS,
INC., KMC TELECOM III, and CONSUMER ADVOCATE OF THE
STATE OF SOUTH CAROLINA,

14 INTERVENORS,

15 DATE: August 30, 2001

16 TIME: 10:00 AM

17 LOCATION: Before the South Carolina Public
18 Service Commission, Columbia, SC

19 REPORTED BY: J. LeVeque and Jane G. LaPorte
20 Court Reporters

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25 jglaporte@aol.com	jleveque@logicsouth.com

1 let me ask you, first of all, do you know if you have
2 proposed any benchmarks below 95 percent?

3 A. We may have a two-part one for call --
4 answering the call center that has an outside limit
5 at 100 percent rate. It starts at 80 percentage and
6 80 percent, but generally we have not.

7 Q. So maybe one, maybe none. You've
8 suggested some benchmarks be set at 99 percent,
9 right?

10 A. Yes. They are very important metrics
11 where we need a high degree of reliability.

12 Q. You have proposed that some benchmarks be
13 set at 100 percent, right?

14 A. Yes, they were ones for very long
15 intervals for a very important product, like
16 collocation.

17 Q. In fact, there are 13 benchmarks in your
18 proposed plans where the benchmarks are set at 100
19 percent, correct?

20 A. Yes, correct. That's where the 13 came
21 from.

22 Q. Now, obviously, 100 percent is
23 perfection, correct?

24 A. Well, you can -- it's perfection, but the
25 perfection might be at a very low standard. You have

1 to look at the interval and the percentage, what
2 times you need it.

3 Q. But my question didn't go to the
4 interval. My question went to the benchmark. If
5 your benchmark is at 100 percent, and if BellSouth
6 performs at 99.999, it's failed, correct?

7 A. Yes. But you have to look at the
8 interval. They go hand and hand. If you have a very
9 long interval, it's pretty easy to reach a hundred
10 percent. If you -- as I've said in other states, if
11 BellSouth proposed benchmarks that were cutting edge
12 and shorter than other states, we might get them give
13 them a lower percentage. But in most cases, you're
14 longer than what other states have adopted.

15 Q. For these measures, if there are 50 in
16 applying benchmarks and you propose 13 of 50 be set
17 at perfection, what that means, basically, is for
18 almost 30 percent of your proposed benchmarks, you're
19 expecting BellSouth to perform at perfection,
20 correct?

21 A. Yes. Again, you have to look at the
22 interval. It might not be that challenging an
23 interval that it's hare to meet 100 percent.

24 Q. For these particular benchmarks, do you
25 have a study or analysis to suggest that the CLECs

1 A. Yes. Georgia did set benchmarks lower,
2 but they did raise them up from where you started, at
3 least.

4 Q. Since we're talking about other states,
5 let me ask you, do you know if there is any state,
6 anywhere, that set 30 percent of the benchmarks at
7 perfection, as you propose?

8 A. No, I don't know any.

9 Q. Thank you.

10 Moving to a slightly different area. In
11 a collocation situation, the standards you propose
12 for the measurement collocation average arrangement
13 time for the physical collocation is 90 days,
14 correct?

15 A. Yes.

16 Q. Under your proposal, BellSouth would have
17 the meet this standard 100 percent of the time,
18 correct?

19 A. Yes.

20 Q. For the measurement collocation
21 percentage of due dates missed for collocation, your
22 proposed standard is that BellSouth must meet 100
23 percent due dates, correct?

24 A. Yes.

25 Q. Let's assume that a CLEC orders physical

Exhibit B

NORTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

	TYPE	REFERENCE NUMBER	STATUS	APP BF DATE	QUOTE ISSUED TO CUSTOMER	FIRM ORDER BF DATE	PERMIT APPLIED	PERMIT OBTAINED	SPACE READY	SPACE ACCEPT	NUMBER OF DAYS SINCE SPACE READY
1	PHY		SR	12-Apr-99	28-May-99	23-Jun-99	27-Dec-99	02-Jun-00	14-Jul-00		390
2	PHY		SR	08-Sep-00	21-Sep-00	25-Sep-00	17-Oct-00	30-Nov-00	14-Dec-00		237
3	PHY		SR	12-Jun-00	26-Jun-00	20-Jul-00	14-Sep-00	03-Jan-01	03-Jan-01		217
4	PHY		SR	31-Oct-00	12-Nov-00	06-Dec-00			19-Feb-01		170
5	PHY		SR	12-Jun-00	26-Jun-00	20-Jul-00	28-Aug-00	09-Oct-00	11-Oct-00		301
6	PHY		SR	23-Aug-00	01-Sep-00	01-Sep-00	22-Sep-00	22-Oct-00	08-Nov-00		273
7	PHY		SR	13-Aug-99	31-Aug-99	18-Oct-99			06-Aug-99		733
8	PHY		SR	14-Feb-00	07-Apr-00	24-Apr-00			14-Jul-00		390
9	PHY		SR	02-Feb-00	03-Apr-00	27-Jun-00			10-Sep-00		332
10	PHY		SR	21-Apr-00	03-May-00	12-May-00			30-Jul-00		374
11	PHY		SR	06-Jul-00	18-Jul-00	31-Jul-00	23-Aug-00	08-Sep-00	15-Oct-00		297
12	PHY		SR	13-Jun-01	15-Jun-01	18-Jun-01			23-Jul-01		15
13	PHY		SR	10-Apr-00	01-May-00	08-May-00	25-May-00	30-May-00	14-Jul-00		390
14	PHY		SR	15-Dec-99	06-Mar-00	30-Mar-00	26-Apr-00	09-May-00	21-Jul-00		383
15	PHY		SR	13-Dec-99	25-Jan-00	08-Feb-00			01-May-00		464
16	PHY		SR	30-Oct-00	10-Nov-00	16-Nov-00	16-Nov-00	30-Nov-00	27-Feb-01		162
17	PHY		SR	13-Dec-99	16-Feb-00	01-Mar-00			24-May-00		441
18	PHY		SR	28-Feb-01	12-Mar-01	15-Mar-01	19-Apr-01	23-Apr-01	21-May-01		79
19	PHY		SR	19-Jul-99	22-Sep-99	12-Oct-99	17-Apr-00	27-Apr-00	24-Jul-00		380
20	PHY		SR	12-Jun-00	26-Jun-00	20-Jul-00	18-Aug-00	12-Oct-00	29-Nov-00		252
21	PHY		SR	10-May-00	15-May-00	23-May-00			06-Aug-00		367
22	PHY		SR	24-Jan-00		02-Apr-00			14-Jul-00		390
23	PHY		SR	08-Sep-00	21-Sep-00	25-Sep-00			22-Dec-00		229
24	PHY		SR	12-Jun-00	26-Jun-00	20-Jul-00	16-Aug-00	08-Sep-00	15-Oct-00		297
25	PHY		SR	12-Jun-00	26-Jun-00	20-Jul-00	15-Aug-00	25-Aug-00	22-Sep-00		320
26	PHY		SR	19-Jun-00	30-Jun-00	24-Jul-00			11-Oct-00		301
27	PHY		SR	22-Jun-00	05-Jul-00	04-Aug-00			02-Oct-00		310
28	PHY		SR	08-Sep-00	21-Sep-00	25-Sep-00	26-Oct-00	11-Dec-00	11-Jan-01		209
29	PHY		SR	11-Apr-01	20-Apr-01	29-May-01			30-Jul-01		8
30	PHY		SR	16-Aug-00	28-Aug-00	30-Aug-00			15-Jan-01		205
31	PHY		SR	26-Mar-01	06-Apr-01	09-Apr-01			14-May-01		86
32	PHY		SR	11-May-99	02-Jun-99	23-Jun-99			10-Jan-00		576
33	PHY		SR	23-Aug-00	01-Sep-00	01-Sep-00	22-Sep-00	22-Oct-00	12-Nov-00		269
34	PHY		SR	13-Dec-99	22-Feb-00	08-Mar-00			01-Jun-00		433
35	PHY		SR	16-Jun-00	27-Jun-00	20-Jul-00	04-Aug-00	22-Sep-00	10-Nov-00		271
36	PHY		SR	12-Jun-00	26-Jun-00	20-Jul-00	18-Aug-00	11-Oct-00	29-Nov-00		252

NORTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

	TYPE	REFERENCE NUMBER	STATUS	APP BF DATE	QUOTE ISSUED TO CUSTOMER	FIRM ORDER BF DATE	PERMIT APPLIED	PERMIT OBTAINED	SPACE READY	SPACE ACCEPT	NUMBER OF DAYS SINCE SPACE READY
37	PHY	[REDACTED]	SR	13-Dec-99	25-Jan-00	08-Feb-00			01-May-00		464
38	PHY	[REDACTED]	SR	12-Jun-00	26-Jun-00	31-Jul-00	23-Aug-00	14-Sep-00	19-Oct-00		293
39	PHY	[REDACTED]	SR	13-Dec-99	25-Jan-00	17-Feb-00	24-Mar-00	01-May-00	09-May-00		456

SOUTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

	TYPE	REFERENCE NUMBER	STATUS	APP BF DATE	QUOTE ISSUED TO CUSTOMER	FIRM ORDER BF DATE	PERMIT APPLIED	PERMIT OBTAINED	SPACE READY	SPACE ACCEPT	NUMBER OF DAYS SINCE
1	PHY		SR	12/07/1999	01/19/2000	03/03/2000			06/06/2000		229
2	PHY		SR	08/07/2000	08/24/2000	09/18/2000			12/07/2000		24
3	PHY		SR	04/07/2000	05/05/2000	05/12/2000	06/07/2000	07/03/2000	07/25/2000		379
4	PHY		SR	03/03/2000	04/10/2000	04/19/2000	05/19/2000	06/02/2000	06/15/2000		419
5	PHY		SR	01/07/2000	03/21/2000	05/11/2000			07/24/2000		390
6	PHY		SR	11/23/1999	01/13/2000	12/18/2000	03/29/2000	06/06/2000	01/31/2001		389
7	PHY		SR	04/07/2000	05/05/2000	05/05/2000	05/19/2000	05/26/2000	07/17/2000		387
8	PHY		SR	01/07/2000	03/21/2000	05/11/2000	04/26/2000	05/09/2000	07/25/2000		378
9	PHY		SR	11/23/1999	01/13/2000	12/18/2000	03/22/2000	04/28/2000	02/07/2001		382
10	PHY		SR	11/29/1999	01/20/2000	02/25/2000	03/22/2000	04/28/2000	06/09/2000		425
11	PHY		SR	08/29/2000	09/12/2000	09/14/2000	10/11/2000	12/12/2000	12/15/2000		236
12	PHY		SR	01/19/2000	03/21/2000	05/11/2000			07/17/2000		387
13	PHY		SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001		151
14	PHY		SR	11/29/1999	01/24/2000	02/25/2000	03/27/2000	06/08/2000	08/10/2000		381
15	PHY		SR	03/10/1999	05/03/1999	05/18/1999	09/23/1999	09/22/1999	03/16/2000		351
16	PHY		SR	08/05/1999	09/29/1999	10/05/1999			01/06/2000		380
17	PHY		SR	11/29/1999	01/24/2000	02/25/2000	03/21/2000	04/10/2000	06/06/2000		428
18	PHY		SR	04/07/2000	05/03/2000	05/12/2000	05/17/2000	07/18/2000	08/22/2000		351
19	PHY		SR	01/27/2000	03/21/2000	05/12/2000			08/10/2000		363
20	PHY		SR	07/20/2000	08/03/2000	09/25/2000	10/10/2000	11/07/2000	12/08/2000		248
21	PHY		SR	04/07/2000	05/04/2000	05/12/2000	02/14/2000	06/14/2000	09/12/2000		330
22	PHY		SR	08/17/2000	08/29/2000	08/30/2000			11/28/2000		380
23	PHY		SR	04/07/2000	05/04/2000	05/12/2000			09/28/2000		314
24	PHY		SR	01/27/2000	03/21/2000	05/11/2000	06/01/2000	06/23/2000	08/10/2000		363
25	PHY		SR	03/01/2000	04/17/2000	07/26/2000			10/26/2000		286
26	PHY		SR	01/27/2000	03/21/2000	05/11/2000			08/08/2000		365
27	PHY		SR	11/08/1999	12/29/1999	02/04/2000	03/01/2000	04/21/2000	05/24/2000		311
28	PHY		SR	01/27/2000	03/21/2000	05/11/2000			08/08/2000		365
29	PHY		SR	08/09/2000	08/24/2000	08/30/2000			11/13/2000		268
30	PHY		SR	10/27/1999	11/19/1999	03/22/2000			06/02/2000		311
31	PHY		SR	04/07/2000	05/04/2000	05/12/2000	06/01/2000	07/05/2000	08/10/2000		363
32	PHY		SR	11/16/1999	02/16/2000	03/01/2000			05/22/2000		443
33	PHY		SR	11/08/1999	01/05/2000	02/04/2000	03/10/2000	04/13/2000	09/06/2000		336
34	PHY		SR	03/03/2000	04/19/2000	04/28/2000	05/18/2000	06/13/2000	07/11/2000		393

SOUTH FLORIDA ACCOUNTS WITH SPACE READY AND NOT ACCEPTED

Report Date: 08/08/01

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35	PHY-AUG	[REDACTED]	SR	04/24/2000	05/17/2000	06/02/2000			06/08/2000		26
36	PHY-AUG	[REDACTED]	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		51
37	PHY-AUG	[REDACTED]	SR	05/19/2000	06/08/2000	07/21/2000			07/24/2000		58
38	PHY-AUG	[REDACTED]	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		51
39	PHY-AUG	[REDACTED]	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		51
40	PHY-AUG	[REDACTED]	SR	04/04/2000	05/02/2000	05/23/2000			07/31/2000		75
41	PHY-AUG	[REDACTED]	SR	06/27/2000	07/06/2000	08/15/2000			09/28/2000		52
42	PHY-AUG	[REDACTED]	SR	09/28/1999	11/15/1999	01/10/2000			03/28/2000		98
43	PHY-AUG	[REDACTED]	SR	09/22/2000	10/06/2000	12/12/2000			01/25/2001		95
44	PHY-AUG	[REDACTED]	SR	01/18/2001	01/31/2001	03/19/2001			06/18/2001		51
45	PHY-AUG	[REDACTED]	SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001		51
46	PHY-AUG	[REDACTED]	SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001		51
47	PHY-AUG	[REDACTED]	SR	01/18/2001	02/01/2001	03/19/2001			06/18/2001		51
48	PHY-AUG	[REDACTED]	SR	01/18/2001	02/01/2001	03/19/2001			04/30/2001		100