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COMMISSION
CLERK

November 16, 2001

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
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 information that BellSouth has prepared in response to a request made by the Commission's staff in a workshop held in this docket on November 9, 2001.

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,

R. Douglas Lackey
(28)

- APP _____
- CAF _____
- CMP _____
- COM 5 cc: All parties of record
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH _____

Marshall M. Criser, III
Nancy B. White

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 000121-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail and (*) Hand Delivery this 16th day of November, 2001 to the following:

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R. Douglas Lackey (2)

**(+) Signed Protective
Agreement**

#237366

ATTACHMENT A:

Billing Accuracy Adjustment:

In its order of September 10, 2001, the Commission directed BellSouth to add a metric proposed by the ALECs, dealing with billing accuracy. The specific measurement that the Commission ordered was labeled "Percent Billing Errors Corrected in X Days." This measurement was proposed by Witness Kinard and is found in her Exhibit KK-4.

As BellSouth attempted to implement this metric, it became clear that there were several problems. Specifically, the metric actually implicates two separate and distinct issues, as can be seen from Ms. Kinard's exhibit. The ALECs want to measure the time in which BellSouth corrects errors in the Daily Usage Feed sent to the ALECs. Presumably the ALECs use this in some fashion to prepare the bills submitted to their customers. However, the ALECs also want to measure the timeliness of BellSouth's corrections to the bills that BellSouth sends to ALECs each billing period. Obviously these are two different things that BellSouth sends to the ALECs and they are not related. To resolve this issue, BellSouth proposed that the metric that the Commission ordered be separated into two separate metrics, one that deals with the Daily Usage Feed and the second that deals with the wholesale bill tendered by BellSouth to the individual ALECs each billing period.

In addition to the problem of combining two very different issues, the metric also presented some problems as the ALECs evidently wanted the metric applied. Once the Daily Usage Feed is generated, there are only two types of errors that can ever be corrected. First, the feed may have been in the wrong format, and if that occurs, the feed can be properly formatted and retransmitted. Second, there could be an error in the header/trailer that accompanies the feed. This is comparable to the information that might be found on the outside of an envelope that is used to communicate data. If the information in the header or trailer is in error, that can be fixed. What cannot be fixed is a problem with the data, since once the data is recorded, it is recorded and there is no way to go back and re-record the data. Therefore any metric that reflects corrections to the Daily Usage Feed has to be limited to these types of errors.

There were similar issues regarding the other metric, which should reflect the timeliness of corrections of errors that BellSouth has made in the wholesale bill tendered to the individual ALECs. Clearly there is the possibility that an error could be made, and when an error occurs, it should be corrected. BellSouth understands that it has reached agreement with Ms. Kinard as to the provisions of the metric dealing with the wholesale bills rendered to ALECs and that agreement is reflected in Exhibit 2 included with this Attachment.

BellSouth has continued to talk with Ms. Kinard regarding the Daily Usage Feed, but has been unable to reach complete agreement with the metric labeled B-9. As a result, since the parties were to file their comments on this issue by Friday, November 16,

2001, BellSouth has included as Exhibit 1 to this Attachment, its version of metric B-9, complete with exclusions, business rules, mode of calculation and all of the other items necessary to complete a metric.

EXHIBIT 1 To ATTACHMENT A:

B-9: Percent Daily Usage Feed Errors Corrected in X Business Days

Definition

Measures the timely correction of Daily Usage Feed (DUF) errors in record information and pack formats measured separately. Errors include (1) Pack Failure errors and (2) EMI content errors in records.

Exclusions

Usage that cannot be corrected and resent or usage that the ALEC doesn't want retransmitted.

ALEC Problem/Issue/File Retransmission forms disputed by BellSouth SMEs that do not result in an EMI error.

Messages and Packs transmitted from BellSouth >10 days of transmission date.

Business Rules

This measure will provide the % of errors corrected in X Business days.

Pack Failure errors are defined as a DUF header/trailer errors containing one or more of the following conditions: Grand total of records not equal to records in pack or sequence/invoice numbers for a from RAO is not sequential.

EMI content errors are defined as those records with errors contained in the EMI detail records that cause a message to be unbillable by the ALEC.

Only notification received via the CLEC Problem/Issue/File Retransmission form (http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter1/ch1sec4.) will be included in this measure.

For each type error condition, a new ALEC Problem/Issue/File Retransmission form should be submitted.

EMI content errors should be attached in a separate file from the CLEC Problem/Issue/File Retransmission form.

Elapsed time is measured in business days.

The clock starts when BellSouth receives ALEC's Problem/Issue/File Retransmission form. Including completion of all relevant fields per BellSouth's web instructions.

The clock stops when BellSouth transmits or makes available the corrected usage to the ALEC.

This measure applies only to ALECs that are ODUF and ADUF participants.

Calculation

Timeliness of Daily Usage EMI Content Errors Corrected = $(a - b) \times 100$

- a = Total number of Daily Usage Records with EMI Content Errors Corrected in the reporting month within 15 Business Days.
- b = Total number of Daily Usage Records with EMI Content Errors corrected in reporting month.

Timeliness of Daily Usage Pack Format Errors Corrected = $(a - b) \times 100$

- a = Total number of Daily Usage Paks with Format Errors Corrected in the reporting month within 5 Business Days.
- b = Total number of Daily Usage Paks with Format Errors corrected in reporting month.

Report Structure

- ALEC Specific
- ALEC Aggregate
- Geographic Scope
 - Region

Data Retained

Relating to ALEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> Report month - BellSouth Recorded - Non-BellSouth Recorded 	<ul style="list-style-type: none"> None

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> Region 	<ul style="list-style-type: none"> Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> Not Applicable 	<ul style="list-style-type: none"> Not Applicable

EXHIBIT 2 To ATTACHMENT A:

B-10: Percent Billing Errors Corrected in X Days

Definition

Measures timely carrier bill adjustments.

Exclusions

Billing adjustments requests that are rejected by BellSouth or disputed by BellSouth.
Adjustments that are initiated by BellSouth.

Business Rules

This measure applies to ALEC wholesale bill adjustments. IXC Access billing adjustment requests are not reflected in this measure. Elapsed time is measured in business days. Clock starts when BellSouth receives the ALEC's Billing Adjustment Request (BAR) (BAR form and instructions can be found at www.inteconnection.bellsouth.com/forms/html/billing&collections.html) form and the clock stops when adjustments is made to bill through ACATS or BOCRIS (generally next ALEC bill unless adjustment request after middle of the month). BellSouth will report separately those adjustment requests that are disputed by BellSouth.

Calculation

Percent Billing Errors Corrected in 45 Days = $\left[\frac{\text{Number of BellSouth Adjustments in 45 Days}}{\text{Total Number of Adjustment Requests in Reporting Period}} \right] \times 100$

Report Structure

ALEC Specific
ALEC Aggregate
Geographic Scope:
State Specific

Data Retained

Related to CLEC Experience	Related to BST Experience
<ul style="list-style-type: none"> • Number of BellSouth Adjustments in 45 days • Total number of Billing Adjustment Requests in Reporting Period • Number of Adjustments disputed by BellSouth (reported separately) 	<ul style="list-style-type: none"> • None

SQM Disaggregation – Retail Analog/Benchmark

SQM Level of Disaggregation	SQM Retail Analog/Benchmark
<ul style="list-style-type: none"> • State 	<ul style="list-style-type: none"> • Diagnostic

SEEM Measure

No	Tier I	
	Tier II	

SEEM Disaggregation –Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

ATTACHMENT B:

Retail Analog For UNE Line Splitting and UNE EELs

The search for a retail analog always begins with an evaluation of the service being provided to the ALEC End User by the product being purchased from BST. The goal is to find an analogous service provided to the BellSouth Retail End User. This will provide an analog that will measure whether BellSouth is providing equality of service to the ALEC so that there will be an equal opportunity to compete. Applying this logic to “UNE Line Splitting” dictates that the retail analog should be “ADSL furnished to Retail.” Applying the logic to EELs dictates that the appropriate analog is “Residence, Business Design, Dispatch.” Both are discussed in more detail below.

A. UNE Line Splitting

1. UNE Line Splitting involves the situation where an ALEC is providing voice service to one of its customers using a loop provisioned as a UNE by BellSouth and the end user customer wants to purchase a data service from that ALEC or even a different ALEC utilizing that same voice line. In other words the customer wants the spectrum on the line split into a voice component and a data component, which requires the provisioning of a “splitter” on the UNE loop the ALEC has purchased from BellSouth.
2. The appropriate retail analog for “Line Splitting” is BellSouth’s “ADSL furnished to Retail.” Essentially this is the identical situation, except it is a BellSouth voice customer calling BellSouth and asking for ADSL, which involves splitting the spectrum on the customer’s existing line and placing a data service on the higher spectrum. Since this involves “splitting” the existing voice line, just as is the case with “Line Splitting,” this is the appropriate retail analog that should be used to measure the speed with which BellSouth provisions “Line Splitting.”

B. UNE EELs

1. Enhanced Extended Links (EELs) provide a means by which an ALEC can provide service to an end-user located in a BellSouth Serving Wire Center (SWC) where an ALEC does not have a collocation presence. The EEL begins at a customer’s premises and ends at the ALEC’s collocation cage in a BellSouth central office, generally after having passed through at least one BellSouth central office in which the ALEC is not collocated. In essence then the EEL consists of three main components:

Loop – the transmission facility between an

End User customer premise Network Interface Device (NID) and a distribution frame in a BST SWC.

Multiplexing – the equipment needed to combine the loop with other loops for transport on a dedicated transport facility.

Interoffice Transport – in the case of an EEL, a dedicated point-to-point transmission path, and its associated electronics between the BellSouth SWC that serves the end user and the BST Service Wire Center where the ALEC has a collocation presence. As noted, this interoffice channel may pass through multiple wire centers.

2. The FPSC Order requires BellSouth to separate EELs as a product and to define a retail analog. BellSouth proposes that the retail analog should be the analog labeled “Residence, Business and Design Dispatch,” which is the same analog used for “UNE combo-Other,” the category in which EELs were included prior to the Commission directing that they be separated. Using the “Residence, Business and Design Dispatch” as the proper analog continues to make sense because the EEL is basically a long loop that runs between the customer’s premises and the ALEC collocation space located in a distant BellSouth wire center. It can be the functional equivalent of a 1FR or a 1FB, or, in the case of some businesses, could be a much higher capacity facility. All of these are included in the analog proposed, although the analog is heavily weighted toward the 1FR and 1FB, because those are the bulk of the services included in that analog.