STATE OF FLORIDA

COMMISSIONERS: LILA A. JABER., CHAIRMAN J. TERRY DEASON BRAULIO L. BAEZ MICHAEL A. PALECKI RUDOLPH "RUDY" BRADLEY



DIVISION OF COMPETITIVE MARKETS AND ENFORCEMENT WALTER D' HAESELEER, DIRECTOR (850) 413-6480

PRIGINAL

Hublic Serbice Commission

January 10, 2002

000121-TP

Ms. Nancy Sims BellSouth Telecommunications, Inc. 150 S. Monroe Street, Suite 400 Tallahassee, Florida 32301

Dear Ms. Sims:

BellSouth submitted a draft Performance Assessment Plan on October 25, 2001. This Plan was submitted in order to allow staff to evaluate BellSouth's compliance with Order No. PSC-01-1819-FOF-TP prior to the final filing. Attached is a summary list of the changes that staff believes need to be made to the draft Plan to assure compliance. All of these changes were discussed at the workshops held on October 25 and November 9, 2001. In addition, staff understands that the parties have reached an agreement on how to implement the Delta Function at the sub-measure level, which will be reflected in the final Plan.

A final Plan should be filed with this Commission by January 23, 2002. Upon such filing, staff will either administratively approve the Plan or, if necessary, submit a staff recommendation to the Commission advising denial or approval of the Plan.

If you have any questions regarding the attached list of changes that staff believes are necessary to bring the Plan into compliance with the Order, please contact me at (850) 413-6806.

Lisa S. Harvey

Bureau Chief

Bureau of Regulatory Review

LSH/bjm

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MP

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OTH

Walter D'Haeseleer

Beth Salak Beth Keating Sally Simmons Jason Fudge

Bureau of Records and Hearing Services (Docket No. 000121)

Florida Self-Effectuating Enforcement Mechanism Administrative Plan

BellSouth Telecommunications Staff's Recommended Modifications Needed for Order Compliance

1.0	Scope
None	
2.0	Reporting
None	
3.0	Modifications to Measures
None	
4.0	Enforcement Mechanisms
4.1.2	"Compliance" should be inserted after the word "Benchmark"
4.1.3	Insert "Retail Analog" after "Enforcement Measurement"
4.1.6	Remove "ALECs" and replace with "submetrics"
4.4.1	Replace "detected" with "incurred"
Appendix A Fee Schedule	
None	
Appendix B SEEM Submetrics	
None	
Appendix C Statistical Properties and Definitions	
None	

Florida Service Quality Measurement Plan BellSouth Telecommunications Staff's Recommended Modifications Needed for Order Compliance

Introduction

None

Report Publication Dates

Add the following language as directed in the order: "BellSouth shall retain the performance measurement raw data files for a period of 18 months and further retain the monthly reports produced in PMAP for a period of three years."

Section 1: Operations Support Systems (OSS)

OSS-1 Average Response Time & Response Interval

Business Rules - Replace 1st sentence of second paragraph with "The date/time stamp shall begin when BST receives a query at the BellSouth Gateway and shall end when the query is transmitted from the BST Gateway."

Business Rules - Need to move the time stamp for LENS. Add implementation language to address when this will take place.

Report Structure - Add "Interface Type."

Table 4 - Needs verification/reference for asterisk at the end of the table header.

OSS-2 Interface Availability

Report Structure - Add "Interface Type."

OSS-3 Interface Availability (Maintenance & Repair)

Report Structure - Add "Interface Type."

PO-1 Loop Makeup - Response Time - Manual

Business Rules - Add definition of "valid."

P-5 Average Completion Notice Interval

Exclusions - Add the word "Test" before Order types.

Business Rules - Need to reflect the order page 53 by removing reference to C-SCOTs.

SQM Analog Benchmark - UNE Line Splitting - ADSL to Retail EELs - Retail DS1/DS3

P-6 % Completions/Attempts without Notice or < 24 hours Notice.

Definition - Delete 1st sentence.

SQM Analog/Benchmark - Should be $\leq 5 \%$

P-8 Cooperative Acceptance Testing - % of xDSL Loops Successfully Tested

Definition - Delete 1st sentence.

P-9 % Provisioning Troubles within 30 days of Service Order Completion

Exclusions - Add the word "Test" before Order types.

SQM Analog Benchmark - UNE Line Splitting - ADSL to Retail EELs - Retail DS1/DS3

P-10 Total Service Order Cycle Time (TSOCT)

Exclusions - Add the word "Test" before Order types.

P-11 Service Order Accuracy

Definition - Remove the word "sample."

Business Rules - Explain sampling process.

Section 4: Maintenance and Repair

M&R-1 Missed Repair Appointments

Exclusions - Do not add proposed red line language.

M&R3 - Maintenance Average Duration

Exclusions - Do not add proposed red line language.

M&R4 - Percent Repeat Trouble within 30 Days

Exclusions - Do not add proposed red line language.

M&R5 - Out of Service (OOS) > 24 Hours

Exclusions - Do not add proposed red line language.

Section 5: Billing

B-1 Invoice Accuracy

Calculation - Number of bills needs to be added to the calculation as well as raw data.

B-2 Mean Time to Deliver Invoices

SEEM Disaggregation - Change "BellSouth region" to "BST - State."

B-3 Usage Data Delivery Accuracy

Add Footnote to "Packs" calculation stating "This calculation was not ordered by FPSC."

B-9 Percent Daily Usage Feed Pack Level Failure Errors Corrected in X Days

Add metric as agreed to with ALECs.

Section 6: Operator Service and Directory Assistance

OS-2 Speed to Answer Performance/Percent Answered with "X" Seconds - Toll

Definition - Do not add proposed red line change. Definition needs to specify 10 seconds.

DA-2 Speed to Answer Performance/Percent Answered with "X" Seconds - Directory Assistance

Definition - Do not add proposed red line change. Definition needs to specify 12 seconds.

Section 7: Database Update Information

None

Section 8: E911

None

Section 9: Trunk Group Performance

TGP-1 Trunk Group Performance - Aggregate

Exclusions - Remove the following:

- Trunk Group blocked due to CLEC network/equipment failure.
- Trunk groups blocked due to CLEC delayed or refused orders.
- Trunk groups blocked due to unanticipated significant increases in CLEC traffic.
- Final groups actually overflowing, not blocked.

TGP-2 Trunk Group Performance - CLEC Specific

Exclusions - Remove the following:

- Trunk Group blocked due to CLEC network/equipment failure.
- Trunk groups blocked due to CLEC delayed or refused orders.
- Trunk groups blocked due to unanticipated significant increases in CLEC traffic.
- Final groups actually overflowing, not blocked.

Section 10: Collocation

None

Section 11: Change Management

CM-1 Timeliness of Change Management Notices

SQM Disaggregation - Analog/Benchmark eliminate parenthesis (≥ 30 days of Release).

SEEM Disaggregation - Analog/Benchmark eliminate parenthesis (≥ 30 days of Release).

Appendix A: Reporting Scope

None

Appendix B: Glossary of Acronyms and Terms

None

Appendix C: BellSouth Audit Policy

None