



Public Service Commission
-M-E-M-O-R-A-N-D-U-M-

DATE: October 22, 2002
TO: All Parties of Record
FROM: Linda H. Dodson, Attorney, Office of the General Counsel *LHD*
RE: Docket No. 000121A Six Month Review of BellSouth Performance Assessment Plan

The attached list of proposed changes to the SQM Plan in Docket 000121A contains items to which agreement has not yet been reached at the workshops held on September 25 and 26, 2002, and October 17 and 18, 2002. Additional comments are requested for the items on the list. Comments should include any compromises you are willing to accept or areas that are negotiable. Please indicate any additional items that can be deferred to the next six-month review. Provide quantitative data to support your position for a change in the SEEM plan or a change to a benchmark or analog. Additionally, if any other state regulatory jurisdiction has previously resolved this issue, indicate if the resolution should or should not be applicable in Florida.

If you have further questions about this memorandum or the attached list, please contact Linda H. Dodson at (850) 413-6216 or Carl Vinson at (850) 413-6812.

LHD

cc: Division of Competitive Markets and Enforcement

TABLE OF DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
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Original No.	Proposer	Reference	Metric	Proposal	Parties Agree
3	BST	Pg 4, 8/30 Filing	OSS-2	MODIFY: <u>Definition</u> - Meaning of Function Availability and Schedule Availability	No
11	BST	Pg 6, 8/30 Filing	O-2	Modify: <u>Benchmark</u> - From 100% to 99.5% for EDI	No
15	BST	Pg 7, 8/30 Filing	O-7	ADD: <u>Exclusion</u> - LSRs identified as projects	No
16	BST	Pg 8, 8/30 Filing	O-9	MODIFY: <u>Benchmark</u> - BST in the midst of analysis and wants opportunity to file during the course of the six-mth review	No
17	BST	Pg 7, 8/30 Filing	O-11	ADD: <u>Exclusion</u> - LSRs identified as projects	No
19	BST	Pg 9, 8/30 Filing	P-2	ADD. <u>Exclusion to P-2A</u> - Orders for which a jeopardy is identified on the due date.	No
21	BST	Pg 10, 8/30 Filing	P-3A	DELETE: Eliminate measurement P-3A (% Missed Installation Appts including Subsequent Appts) & replace with P-3 (% Missed Installation Appts). BST wants to exclude subsequent appointments.	No
22	BST	Pg 11, 8/30 Filing	P-3A	<u>Benchmark</u> - BST in the midst of analysis and wants opportunity to file during the course of the six-mth review	No
23	BST	Pg 10, 8/30 Filing	P-4A	DELETE: Eliminate measurement P-4A (Avg Order Completion & Completion Notice Intvl Dist) and replace with original measure P-4 (Avg Completion Intvl & Order Completion Intvl)	No
24	BST	Pg 11, 8/30 Filing	P-4A	<u>Benchmark</u> - BST in the midst of analysis and wants opportunity to file during the course of the six-month review	No

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29	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	<u>ADD:</u> <u>Exclusion</u> - 2)trunk groups blocked due to ALEC delayed or refused orders	No
30	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	<u>ADD:</u> <u>Exclusion</u> - 3)trunk groups blocked due to unanticipated significant increases in ALEC traffic	No
32	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	<u>MODIFY BENCHMARK:</u> Currently refers to trunk blockage for "any two hour period in 24 hours". BST wants to change to "any two consecutive hour period in 24 hours"	No
SQM Changes- EXHIBIT 3					
10	BST	Exhibit 3	OSS-3	Definition change: This measures the % of time the OSS interface is functionally available compared to scheduled availability % for the CLEC and BST interface systems and for the legacy systems access by them are captured. % of time applications are functionally available as compared to scheduled availability. Calculations are based upon availability of applications and interfacing applications utilized by CLECs for maintenance & repair. "Functional Availability" is defined as the combined total # of hours per application/interface in the reporting period that application/interface components are available to users. "Scheduled Availability" is defined as the combined total # of hrs in the reporting period that application/interface components are scheduled to be available.	No
15	BST	Exhibit 3	PO-2	Business Rules-Delete references to "LENS"	No
18	BST	Exhibit 3	O-12	Report Structure changes: Delete Note: Combination of Residence Service Center and Business Service Center data under development Under BST: Delete Business Service Center Delete: Residence Service Center. Replace with Retail Service Center (Business Retail Service Center + Residence Retail Service Center)	No

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25	BST	Exhibit 3	P-3	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark UNE ISDN (incl UDC) Retail ISDN-BRI	No
25	BST	Exhibit 3	P-3	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark <u>UNE UDC/ISDL</u> <u>Retail ISDN-BRI and</u> <u>PRI</u>	No
25	BST	Exhibit 3	P-3	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark UNE Line Splitting ADSL <u>Provided to</u> Retail	No
28	BST	Exhibit 3	P-3A	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark UNE ISDN (incl UDC) Retail ISDN-BRI	No
28	BST	Exhibit 3	P-3A	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark <u>UNE UDC/ISDL</u> <u>Retail ISDN-BRI and</u> <u>PRI</u>	No
28	BST	Exhibit 3	P-3A	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark UNE Line Splitting ADSL <u>Provided to</u> Retail	No

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2	ALEC	Pg 7, 8/30 Filing	P-1	ADD to SEEM: • Mean Held Order Interval	No
3	ALEC	Pg 7, 8/30 Filing	P-2	ADD to SEEM: • Jeopardy Notice Intvl & % Orders Given Jeopardy Notice	No
4	ALEC	Pg 7, 8/30 Filing	P-4	ADD to SEEM: • Avg Completion Notice Intvl	No
5	ALEC	Pg 8, 8/30 Filing	B-9	ADD to SEEM: • % Daily Usage Feed Errors Corrected in X Bus Days	No
6	ALEC	Pg 8, 8/30 Filing	B-5	ADD to SEEM: • Usage Data Delivery Timeliness	No
7	ALEC	Pg 8, 8/30 Filing	B-9	ADD to SEEM: • % Billing Errors Correct in X Days	No
8	ALEC	Pg 8, 8/30 Filing	CM-2	ADD to SEEM: • Change Mgmt Notice Avg Delay Days	No
9	ALEC	Pg 8, 8/30 Filing	CM-4	ADD to SEEM: • Change Mgmt Documentation-Avg Delay Days	No
10	ALEC	Pg 8, 8/30 Filing	CM-4	ADD to SEEM: Number of Defects in Production Releases (Type 6 CR)	No
13	ALEC	Pg 8, 8/30 Filing	P-11	ADD to Tier 1, once BST has mechanized this measure	No
15	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Tier I Metric	No

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16	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Truncated Z-Score	No
17	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Balancing Critical Value	No
18	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Pass/Fail Indication	No
19	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Benchmark %	No
20	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • BST Metric Result	No
21	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • ALEC Metric Result	No
22	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Total ALEC Volume	No
23	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Fee Schedule Amount	No
24	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Remedy Paid	No
29	ALEC	Pg 10, 8/30 Filing	CM-6	MODIFY: More significant remedy payment (\$35,000)	No
30	ALEC	Pg 10, 8/30 Filing	CM-7	MODIFY: More significant remedy payment	No
31	ALEC	Pg 10, 8/30 Filing	CM-11	MODIFY: More significant remedy payment (\$100,000)	No

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32	ALEC	Pg 11, 8/30 Filing	NEW SQM	ADD: <u>SQM</u> - Special Access Metrics	No
33	ALEC	Pg 15, 8/30 Filing	NEW SQM	ADD: <u>SQM</u> - Ordering Trouble Ticket Responses in 48 Hours	No
34	ALEC	Pg 16, 8/30 Filing	NEW SQM	ADD: <u>SQM</u> - Percent Line Loss Notifications Returned within 24 Hours of Disconnect Order Completion and Average Delay for Line Loss Notifications	No
36	ALEC	Pg 17, 8/30 Filing	ADM	Raw data necessary to verify accuracy of BST's reports should be made available	No
37	ALEC	Pg 18, 8/30 Filing	ADM	BST should be required to respond to requests for data reconciliation in a timely manner	No
38	ALEC	Pg 20, 8/30 Filing	ADM	BST should be required to report any report that changes because of a revision in the underlying data. BST will only repost benchmark metrics that are in out-of-parity condition if there is a greater than 2% deviation in performance	No

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ALEC SQM Redline					
1	ALEC	PG 4, ALEC Modified Redline	CM-9	MODIFY: Add as Tier I & II Penalty	No
2	ALEC	PG 4, ALEC Modified Redline	OSS-2	MODIFY: Business Rules regarding downtime.	No
4	ALEC	PG 7, ALEC Modified Redline	OSS-3	MODIFY: Business Rules regarding downtime.	No
8	ALEC	PG 21, ALEC Modified Redline	O-3	MODIFY: Benchmark to include UNE-P at 95% and UNE and LNP at 90%.	No
9	ALEC	PG 24, ALEC Modified Redline	O-4	MODIFY: Benchmark to include UNE-P at 95% and UNE and LNP at 90%.	No
10	ALEC	PG 31, ALEC Modified Redline	O-8	DELETE: Exclusion for "LSRs identified as projects".	No
11	ALEC	PG 31, ALEC Modified Redline	O-8	MODIFY: Change exclusion "LCSC" to "center(s)".	No
12	ALEC	PG 33, ALEC Modified Redline	O-8	MODIFY: Disagg to include projects (diagnostic).	No
13	ALEC	PG 33, ALEC Modified Redline	O-8	MODIFY: Benchmark for partially mech to ≤ 5 hrs and non-mech to ≤ 10 hrs.	No

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14	ALEC	PG 35, ALEC Modified Redline	O-9	DELETE: Exclusion for "LSRs identified as projects".	No
16	ALEC	PG 38, ALEC Modified Redline	O-9	MODIFY: Disagg to include projects (diagnostic).	No
17	ALEC	PG 38, ALEC Modified Redline	O-9	MODIFY: Benchmark for partially mech to ≤ 5 hrs and non-mech to ≤ 10 hrs.	No
19	ALEC	PG 42, ALEC Modified Redline	O-11	MODIFY: Benchmark from 95% to 97%.	No
20	ALEC	PG 43, ALEC Modified Redline	O-12	DELETE: Business Rules - eliminate "service" & "LCSC".	No
21	ALEC	PG 43, ALEC Modified Redline	O-12	ADD: Report Structure-CRSG and EC Support Desk.	No
22	ALEC	PG 43, ALEC Modified Redline	O-12	DELETE: Data retained - Delete "LCSC".	No
23	ALEC	PG 43, ALEC Modified Redline	O-12	ADD: Disagg-CRSG - Parity with Retail	No
24	ALEC	PG 43, ALEC Modified Redline	O-12	ADD: Disagg: EC Support Desk-Parity with Retail	No

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26	ALEC	PG 48, ALEC Modified Redline	P-1	ADD: Disagg-word "industrial" after ADSL.	No
27	ALEC	PG 50, ALEC Modified Redline	P-2	ADD: Disagg-word "industrial" after ADSL.	No
28	ALEC	PG 51, ALEC Modified Redline	P-2	MODIFY: SEEM Disagg-Remove "Not Applicable" and replace w/"Same as SQM disagg and benchmark/analog above"	No
30	ALEC	PG 55, ALEC Modified Redline	P-3A	MODIFY: Exclusion "Canceled Service Order" and replace w/"Orders canceled prior to the due date"	No
31	ALEC	PG 55, ALEC Modified Redline	P-3A	DELETE: Exclusion for "Disconnect (D) & From (F) orders"	No
32	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-UNE UDC/IDSL - Benchmark of Retail ISDN-BRI.	No
33	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-ALEC disconnect requests-dispatch - Benchmark of 95% on time.	No
34	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-ALEC disconnect requests-central office - Benchmark of 95% on time.	No
35	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-BST disconnects due to migrations-dispatch - Benchmark of 95% on time.	No

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36	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-BST disconnect due to migrations-central office - Benchmark of 95% on time.	No
38	ALEC	PG 61, ALEC Modified Redline	P-4A	MODIFY: Business Rules-replace "issues a FOC or SOCs date time stamp receipt of an order" with "receives a valid LSR or ASR.	No
39	ALEC	PG 62, ALEC Modified Redline	P-4A	ADD: SQM Disagg - UNE UCL (Non-Design) - Benchmark of 5 Days.	No
40	ALEC	PG 62, ALEC Modified Redline	P-4A	ADD: UNE UDC/ISDL - Benchmark of Retail ISDN-BRI.	No
41	ALEC	PG 62, ALEC Modified Redline	P-4A	ADD: SQM Disagg - Word "industrial" after ADSL.	No
44	ALEC	PG 66, ALEC Modified Redline	P-5 (P-4 in ALEC Comments)	ADD: SEEM: Add to Tier I and Tier II.	No
45	ALEC	PG 66, ALEC Modified Redline	P-5 (P-4 in ALEC Comments)	MODIFY: SEEM Disagg-Remove "Not Applicable" and replace w/"Same as SQM disagg and benchmark/analog above".	No
47	ALEC	PG 74, ALEC Modified Redline	P-7B	MODIFY: Benchmark-Unbundled Loops w/INP-Replace "Diagnostic (to be established at the 6 month review period)" with "98% in one hour, 100% in 2 hours"	No
48	ALEC	PG 74, ALEC Modified Redline	P-7B	MODIFY: Benchmark-Unbundled Loops w/LNP-Replace "Diagnostic (to be established at the 6 month review period)" with "98% in one hour, 100% in 2 hours"	No

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50	ALEC	PG 76, ALEC Modified Redline	P-7C	MODIFY: SQM Disagg - replace "5%" with "3%".	No
52	ALEC	PG 80, ALEC Modified Redline	P-9	ADD: SQM Disagg - Word "industrial" after ADSL.	No
53	ALEC	PG 82, ALEC Modified Redline	P-10	DELETE: Delete SQM and modify average completion interval as noted.	No
54	ALEC	PG 86, ALEC Modified Redline	P-11	ADD: Definition-"orders that require manual handling" and also "For manually submitted orders where CLECs have no alternative, BST will use a sampling process of non-mechanized/manually submitted LSRs.	No
55	ALEC	PG 86, ALEC Modified Redline	P-11	DELETE: Exclusion for "Listing Orders".	No
56	ALEC	PG 86, ALEC Modified Redline	P-11	ADD: Exclusion for "Fully mechanized LSRs that do not fall to manual handling before order is completed."	No
57	ALEC	PG 86, ALEC Modified Redline	P-11	ADD: Business Rules-"For mechanized orders, BST will compare the LSR as sent by the CLEC to the final CSR after order completion to determine accuracy. For manual orders, BST will select a"	No
58	ALEC	PG 86, ALEC Modified Redline	P-11	ADD: Business Rules - add "non-mechanized" before service orders.	No
59	ALEC	PG 86, ALEC Modified Redline	P-11	MODIFY: Business Rules-Replace "not be counted. For small sample sizes an effort will be made to replace the service request" with "be counted as a miss".	No

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60	ALEC	PG 86, ALEC Modified Redline	P-11	ADD: Calculation-Add "Manually Handled" before "orders completed".	No
61	ALEC	PG 86, ALEC Modified Redline	P-11	MODIFY: Report Structure-Delete "Reported in categories of < 10 line/circuits;>= 10 line/circuits" and "Dispatch/Non-Dispatch" and replace these with "State".	No
64	ALEC	PG 91, ALEC Modified Redline	M&R-1	ADD: Exclusion-Add verbage "The number of trouble tickets excluded will be reported for this measure"	No
65	ALEC	PG 94, ALEC Modified Redline	M&R-2	ADD: Exclusion-Add verbage "The number of trouble tickets excluded will be reported for this measure"	No
66	ALEC	PG 96, ALEC Modified Redline	M&R-3	ADD: Exclusion-Add verbage "The number of trouble tickets excluded will be reported for this measure"	No
67	ALEC	PG 99, ALEC Modified Redline	M&R-4	ADD: Exclusion-Add verbage "The number of trouble tickets excluded will be reported for this measure"	No
68	ALEC	PG 99, ALEC Modified Redline	M&R-4	ADD: Business Rules-Include "Troubles closed to a non-excluded code will be counted as repeats even if the prior trouble closure was an excluded code."	No
69	ALEC	PG 102, ALEC Modified Redline	M&R-5	ADD: Exclusion-Add verbage "The number of trouble tickets excluded will be reported for this measure"	No
74	ALEC	PG 118, ALEC Modified Redline	B-5	ADD: SEEM - Add to Tier I and Tier II.	No

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75	ALEC	PG 118, ALEC Modified Redline	B-5	MODIFY: SEEM Disagg-Replace "Not applicable" with "Parity with Retail".	No
83	ALEC	PG 127, ALEC Modified Redline	B-10	MODIFY: SQM Disagg - Replace "Diagnostic" with "95% within interval"	No
84	ALEC	PG 127, ALEC Modified Redline	B-10	MODIFY: SEEM Disagg - Replace "Not Applicable" with "State".	No
90	ALEC	PG 142, ALEC Modified Redline	TGP-1	ADD: Business Rules-Add "Any trunk group blocking for more than an hour four times during the month is counted even if those times vary from the time-of-day analysis."	No
91	ALEC	PG 143, ALEC Modified Redline	TGP-1	ADD: Benchmark-Add "hours do not have to be consecutive"	No
92	ALEC	PG 143, ALEC Modified Redline	TGP-1	DELETE: Benchmark-Delete "by more than .5%"	No
93	ALEC	PG 145, ALEC Modified Redline	TGP-2	ADD: Business Rules-Add "Any trunk group blocking for more than an hour four times during the month is counted even if those times vary from the time-of-day analysis."	No
94	ALEC	PG 146, ALEC Modified Redline	TGP-2	ADD: Benchmark-Add "does not have to be consecutive"	No
95	ALEC	PG 146, ALEC Modified Redline	TGP-2	DELETE: Benchmark-Delete "by more than .5%"	No

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98	ALEC	PG 154, ALEC Modified Redline	CM-2	MODIFY: SEEM Disagg-Replace "Not Applicable" with "Region"	No
99	ALEC	PG 154, ALEC Modified Redline	CM-2	MODIFY: SEEM Disagg-Replace "Not Applicable" with "<+ 5 Days".	No
100	ALEC	PG 155, ALEC Modified Redline	CM-3	ADD: SEEM - Add to Tier I.	No
101	ALEC	PG 156, ALEC Modified Redline	CM-4	MODIFY: SEEM Disagg-Replace "Not Applicable" with "Region"	No
102	ALEC	PG 156, ALEC Modified Redline	CM-4	MODIFY: SEEM Disagg-Replace "Not Applicable" with "<+ 5 Days".	No
104	ALEC	Pg 170, BST Redline	CM-10	Need weighting table for software validation metric.	No