

ORIGINAL



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November 15, 2002

Ms. Blanco S. Bayó, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
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RE: Docket 000121B – Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (SPRINT – FLORIDA TRACK)

Dear Ms. Bayo:

As requested by Staff, enclosed are Sprint's comments to Staff's Proposal to the Sprint Wholesale Performance Measurement Plan. Service has been made this same day via U.S. Mail to the parties listed on the attached service list.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Sincerely,

Susan S. Masterton

Enclosures

cc: Lisa Harvey

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**CERTIFICATE OF SERVICE
DOCKET NO. 000121B-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery* or U.S. Mail this 15th day of November, 2002 to the following:

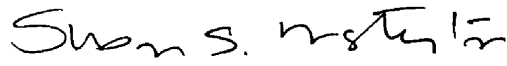
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Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In RE: Investigation into the Establishment
Of Operations Support Systems Permanent
Performance Measures for the Incumbent Local
Exchange Telecommunications Companies

Docket NO: 000121B-TP

Filed: November 15, 2002

COMMENTS OF SPRINT CORPORATION

Section 1

Sprint appreciates the opportunity to comment on the Florida Public Service Commission Staff recommendation dated 11/1/02 in Docket No. 000121B-TP (OSS).

Staff's recommendation to implement in Florida the existing scope and content of the Sprint Performance Measurement Plan ("Cookbook") and associated parity methodology is cost-efficient and will benefit CLECs. It also acknowledges previous collaborative plan development efforts between state Commissions, CLECs and Sprint. Staff recognizes the advantages of implementing a universally consistent performance measurement plan¹, rather than encouraging a myriad of state-specific plans. Sprint advocates a single plan that is universally applicable at a national level. This accomplishes the dual goal of maximizing value to CLECs and the Commission and minimizing administrative costs to Sprint, CLECs and the Commission. Primary advantages of a universal plan include:

¹ Currently one universal Sprint "Cookbook" is utilized in all Sprint operating states. The current Sprint "Cookbook" and associated parity methodology evolved from the original 2000 version developed in conjunction with Nevada CLECs, Nevada Public Utilities Commission (PUC) Staff and the Bureau of Consumer Protection, and approved by the Nevada PUC. The Sprint "Cookbook" was subsequently reviewed and ordered by the North Carolina Utilities Commission and Indiana Utility Regulatory Commission. Annual reviews and modifications to the Sprint "Cookbook" occurred in Nevada in 2001 and 2002. A subset of Sprint's performance measurements are published to CLECs upon request in all states that have not formally addressed performance measurements for Sprint.

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1. It saves time and cost to CLECs who operate in multiple states and utilize Sprint's performance reporting. With a single Sprint plan, CLECs do not have to adapt to multiple plans, and can efficiently analyze their results at the national level.
2. It saves time and cost to state Commissions. Stipulating to other state recommendations would allow the Sprint plan to evolve with inputs from multiple sources, and necessitate less frequent reviews by each state.
3. It enables Sprint to utilize consistent provisioning and maintenance processes across all states. Inconsistent state standards would necessitate different processes and different improvement efforts. Universal standards increase the speed of Sprint improvement efforts and this is beneficial to our CLEC customers.

Staff's recommendation to review the need for enforcement measures six months after the "Cookbook" effective date will ensure an appropriate consideration period. Sprint's service to CLECs has never been better and further service improvement efforts are continuing. This year, Sprint documented over 100 major improvement initiatives that required system enhancements. Significant system enhancements are planned for early 2003 and planning for future improvements is underway. Sprint is committed to continual improvement and has implemented extensive mechanisms for ensuring that problems are quickly identified and addressed. Based on previous and future initiatives, we believe enforcement measures are not necessary or appropriate for Sprint.

Section 2

Sprint generally supports the following:

- Review Process (Staff Issue 7)

- Publishing of Root Cause Analysis (Staff Issue 8)
- Audit (Staff Issue 11-13)

While Sprint generally agrees with these elements, Sprint has concerns with some execution details recommended by Staff and will address these concerns in the remainder of this document.

Review Process (Staff Issue 7)

Staff's recommendation for collaborative workgroups would enable CLECs and Staff participation in the reviews. However, Sprint does not believe that recurring six-month reviews during the first two years are necessary. While numerous changes to the performance measurement plan occurred in past years to improve the accuracy of the measurements, changes to each iteration are less substantial. Few substantive changes are anticipated in future iterations. Rather than establishing ongoing six-month review periods, Sprint believes that the review schedule should be established during the first review. The Nevada PUC ordered annual reviews for the first three years and is moving to three-year review cycles starting in 2003. However, Sprint and Nevada CLECs may propose changes at any time if the Nevada PUC agrees that the requests are significant and warrant a procedural schedule.

Sprint is concerned that CLEC participation in six-month review workgroups would not yield the desired outcome. Six-month reviews could dilute CLEC participation due to the required high level of commitment. Less frequent reviews would encourage more consistent CLEC participation because it would require less CLEC time and expense.

CLEC participation in Sprint's docket may also be influenced by their participation in review proceedings for BellSouth's performance measurements.

Sprint currently sponsors a forum to address CLEC concerns regarding service performance. Sprint sponsors Local CLEC Task Force (LCTF) quarterly meetings with CLECs in Sprint's eastern region including Florida, and also in Nevada. The goal is for Sprint to share information (i.e., new products, operational and technical issues, support systems), gather CLEC feedback and concerns and discuss solutions, and assign actionable items that will address CLEC concerns. LCTF has proved to be very successful. CLEC participation is ever-increasing and overall feedback is positive. Attendance at the November LCTF East included 29 total CLECs, of which 13 operate in Florida. Sprint plans to continue LCTF on an ongoing basis.

Sprint believes that a universal plan is the best enabler of Sprint service improvement efforts. Sprint anticipates future plan reviews in Florida and Nevada, and is taking action to request that each state adopt each other's changes. Automatic Commission acceptance of changes ordered by other states would be the ideal model. Alternatively, Sprint urges this Commission to stipulate to all measurement changes ordered by other states after a review and approval process.

Sprint wishes to provide a point of clarification. Sprint filed the "2002 Sprint Performance Measurement Plan Compliance Methodology" with this Commission on October 29, 2002. Staff objected to the verbiage in Section 6.1.1:

“When the Nevada PUC issues an order approving changes to the Nevada PMP, Sprint will submit a request within 15 days to the Florida PSC for approval of those changes. The Florida PSC is requested to review and approve the changes within 15 days, and approve a simultaneous implementation date.”

Sprint’s intention was to ensure that approval from Nevada and Florida would be obtained in the same timeframe to enable simultaneous implementation of changes, and the suggested timeframe for review and approval is at the discretion of this Commission. Typically the Nevada order is issued at least thirty days after the PUC approves the settlement stipulation. Sprint will immediately file those changes with this Commission when the settlement stipulation is approved by the PUC, which would allow a total of forty-five or more days for review by this Commission. Sprint suggests a fifteen or thirty-day timeframe for review and approval of other state changes by this Commission, but will agree to any reasonable recommended timeframe because the goal is to preserve a universal plan.

Publishing of Root Cause Analysis (Staff Issue 8)

Sprint is committed to service improvement on an ongoing basis. The Sprint CLEC reporting group analyzes results each month to identify new areas of concern, monitors the status of existing service improvement efforts, and initiates an ad-hoc task force when a cross-functional team is required. Operational groups conduct monthly in-depth root cause analysis when a new area of concern is identified by their group or by the Sprint CLEC reporting group. Operational groups are held accountable for service improvement planning and execution.

Sprint is willing to report root cause analysis to this Commission as recommended by Staff, although Sprint wishes to ensure this task maximizes value to the Commission while minimizing the administrative burden on Sprint. High-concern issues (usually involving system enhancements) are the only issues monitored by the Sprint CLEC reporting group. Root cause analysis that supports smaller efforts and region-specific efforts are internally managed by a dozen different operational groups, and not consolidated in a single document. In addition, the documentation is written for an audience with knowledge of Sprint-specific acronyms and processes.

Due to the high level of administrative effort to prepare monthly root cause analysis documentation for Commission review, Sprint recommends the following modifications to Staff's recommendation: (1) Sprint prepares quarterly documentation for the Commission based on the three most recent months of analysis; and (2) Sprint provides root cause analysis documentation for any disaggregation with three months of consecutive performance failures if compliance for the overall disaggregation² was less than 90%.

Audit (Staff Issue 11-13)

Sprint agrees that auditing is an essential element of any performance measurement plan. However, Sprint believes that reliance upon third-party auditors is not a long-term solution for ensuring reporting accuracy because they only examine a snapshot of data

² Sprint utilizes overall disaggregation compliance as a reliable issue identifier. If one CLEC exhibits consecutive months of noncompliance when other CLECs are compliant for the disaggregation, the root cause is usually random variation or the CLEC is discontinuing service. This situation rarely persists over time and is usually self-resolving. In contrast, systematic noncompliance would create an overall reduction in disaggregation compliance and result in consecutive months of noncompliance for at least one CLEC.

(i.e., one or two months). Sprint does not believe the cost of an external audit is justified if internal audit procedures are equally effective or more effective, especially since monthly internal audit procedures are more likely to find new issues in a timely manner. Sprint adheres to monthly internal audit procedures and is actively engaged in expanding those procedures. Automated validation of monthly data is conducted each month. In addition, reporting teams from all relevant operational groups conduct manual validation reviews each month. Review of programming code is conducted on a periodic basis.

Sprint does not support Staff's recommendation for annual audits for the first five years after implementation of the performance measurement plan although Sprint recognizes that annual audits may be appropriate for the scope of RBOC measurements and systems. Sprint believes it is more appropriate for the audit schedule to be established after the initial audit findings are submitted to this Commission. As a mid-sized ILEC, Sprint does not have the same financial resources or scope of measurements compared to RBOCs. Sprint expects few substantive changes to the "Cookbook" from year to year, so the benefits of an annual audit would be limited. The major parts of a measurement such as the scope, definition, calculation and most business rules are not expected to change significantly in future years. The changes are also not expected to require significant coding or process changes that need to be externally audited on an annual basis.

Sprint believes that appropriate internal audit mechanisms are in place now or will be implemented soon, and therefore the financial burden of annual audits is not justified for Sprint. Sprint was required by Nevada to conduct one external audit at Sprint's expense with subsequent audits to be requested by CLECs and cost shared 50% with CLECs.

Sprint was also required to conduct one external audit for North Carolina. These audits are in progress. Sprint found that an increase in internal audit procedures produced a decrease in external findings. In fact, most recent external audit findings were already identified by Sprint via internal audit procedures, and Sprint had already fixed or initiated fixes for the problems.

Sprint can agree to an initial audit (see scope of initial audit below) and additional audits if requested by the Commission or CLECs if there is a valid business reason. For example, Sprint could perform a more comprehensive audit involving several measures if a CLEC requested mini-audit is unable to resolve CLEC issues or concerns.

Regarding scope of the audit, Sprint believes the audit scope should be jointly determined between Sprint and the CLEC community. Sprint's current external auditors recommended the selection of a statistically valid sample of measurements (50% of measurements) for the current Sprint comprehensive audit. An audit of a valid sample of measures would provide nearly the same benefits as auditing all measures. Therefore, Sprint recommends that the parties jointly select the 50% of measurements to be audited. Sprint also recommends that measures within each major operating category should be audited, such as ordering, provisioning, maintenance, etc. Several measures are very similar in scope, calculation methodology, and business rules, so only one measure in each major category would need to be included in the audit. An example of similar measures can be found in Measure 11- Percent of Due Dates Missed and Measure 12- Percent of Due Dates Missed (Due to Lack of Facilities).

Regarding selection of the independent auditing firm, Sprint believes it is reasonable for the firm to be jointly selected by Sprint and the CLEC community. However, if Sprint is entirely responsible for the audit cost, Sprint will not support a CLEC-recommended audit firm if the estimated cost exceeds the cost of an equally qualified firm.

Section 3

Sprint wishes to supplement Staff's recommendation on three elements:

- Collocation measurements (referenced in Staff Issue 2)
- Initial effective date (Staff Issue 6)

Collocation measurements (referenced in Staff Issue 2)

Accompanying these comments is the 2002 "Cookbook" recommended by Staff with Sprint redlines to collocation measures 40 and 41. These redlines should ensure consistency with Florida standards of compliance in the provision of collocation services as specified in Order No. Commission-00-0941-FOF-TP, as recommended by Staff.

Initial effective date (Staff Issue 6)

Staff's proposed effective date is feasible. Sprint requests that the effective be established as the first day of the month following thirty days after the Final Order is signed by the Commission. This will ensure a full reporting month.

Sprint Performance Measurements Report Requirements

Collocation

Measure 40

Title: Time to Respond to a Collocation Request

<i>Area</i>	<i>Requirement Description</i>																																		
Description	Measures the percentage of time the ILEC responds to a CLEC complete collocation request, within the allotted time.																																		
Method of Calculation	<p>Space Availability: $\frac{[(\text{Count of Complete Requests returned within 15 calendar days}) / (\text{Count of requests returned for Space Availability})] \times 100}{}$</p> <p>Price and Schedule Quote: $\frac{[(\text{Count of Complete Requests Returned within 15 calendar days}) / (\text{Count of requests returned for Price and Schedule Quote})] \times 100}{}$</p> <p>Right Of Way Required: $\frac{[(\text{Count of complete Space Availability requests requiring ROW permits returned within TBD calendar days}) / (\text{Count of Space Availability requests returned that required ROW permits})] \times 100}{}$</p> <p>ICB (Individual Case Basis) Quote: $\frac{[(\text{Count of complete ICB Price and Schedule Quote requests returned within 20 calendar days}) / (\text{Count of ICB Price and Schedule Quote requests})] \times 100}{}$</p>																																		
Report Period	Monthlv																																		
Report Structure	Individual CLECs, CLECs in the aggregate and by ILEC Affiliates																																		
Reported By	<ul style="list-style-type: none"> • All Collocation Types: Caged, Cageless, Virtual, and Other • Space Availability • Price and Schedule Quote • Space Availability Requests Requiring ROW Permits • Price and Schedule Quotes for non-Commission Approved Price List requests with Individual Case Basis (ICB) requirements 																																		
Geographic Level	Statewide																																		
Measurable Standards	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: left;">Benchmark</th> </tr> <tr> <th style="width: 30%;">Disaggregation Level</th> <th style="width: 30%;">CLEC</th> <th colspan="2" style="width: 40%;">Competitive Comparison</th> </tr> <tr> <td></td> <td></td> <th style="width: 15%;">Parity</th> <th style="width: 25%;">Benchmark</th> </tr> </thead> <tbody> <tr> <td colspan="4">Space Availability:</td> </tr> <tr> <td>Physical Caged</td> <td>Space Availability Requests</td> <td></td> <td>100% in 15 Calendar days</td> </tr> <tr> <td>Physical Cageless</td> <td>Space Availability Requests</td> <td></td> <td>100% in 15 Calendar days</td> </tr> <tr> <td>Virtual</td> <td>Space Availability Requests</td> <td></td> <td>100 % in 15 Calendar days</td> </tr> <tr> <td>Other</td> <td>Space Availability Requests</td> <td></td> <td>100% in 15 Calendar days</td> </tr> <tr> <td>ROW</td> <td>Space Availability Requests</td> <td></td> <td>100% in 15 Calendar days</td> </tr> </tbody> </table>	Benchmark		Disaggregation Level	CLEC	Competitive Comparison				Parity	Benchmark	Space Availability:				Physical Caged	Space Availability Requests		100% in 15 Calendar days	Physical Cageless	Space Availability Requests		100% in 15 Calendar days	Virtual	Space Availability Requests		100 % in 15 Calendar days	Other	Space Availability Requests		100% in 15 Calendar days	ROW	Space Availability Requests		100% in 15 Calendar days
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Sprint Performance Measurements Report Requirements

Price and Schedule Quote			
Physical Caged	Price and Schedule Quotes		100% in 15 Calendar days
Physical Cageless	Price and Schedule Quotes		100% in 15 Calendar days
Virtual	Price and Schedule Quotes		100% in 15 Calendar days
Other	Price and Schedule Quotes		100% in 15 Calendar days
ICB Requests	ICB Price and Schedule Quotes		100% within 15 Calendar days
Business Rules	<ul style="list-style-type: none"> Excludes orders canceled by CLEC Excludes requests/applications that are incomplete and must be returned to CLEC for completion. The new completed version counts as a new request. If a CLEC submits ten or more applications within ten calendar days the initial 15 day response period will increase by 10 days for every additional 10 applications. Sprint will provide a tracking log for ROW requests that provide the following component: Name of agency contacted, date ROW request submitted to the agency, and date ROW received from agency. 		
Notes	<ul style="list-style-type: none"> Sprint agrees to provide affiliate data to the PUC, Bureau of Consumer Protection and the CLECs under proprietary information provisions. 		

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<#>The benchmark is To Be Determined for requests where Right of Way (ROW) access must be obtained to determine space availability. ¶

Sprint Performance Measurements Report Requirements

Collocation

Measure 41

Title: Time to Provide a Collocation Arrangement

Area	Requirement Description		
Description	Measures the percentage of time the ILEC responds to the CLEC approved* collocation request, within the allotted time. *Approved means ILEC approves the application and has received, from CLEC, financial payment or bond.		
Method of Calculation	$\left[\frac{\text{Count of Collocation Arrangements completed within 90 calendar days}}{\text{Count of Collocation Arrangements Completed}} \right] \times 100$		
Report Period	Monthly		
Report Structure	Individual CLECs, CLECs in the aggregate and by ILEC Affiliates		
Reported By	<ul style="list-style-type: none"> • All Collocation Types: Caged, Cageless, Virtual, and Other • New • Augment 		
Geographic Level	Statewide		
Measurable Standard	Disaggregation Level	CLEC	Competitive Comparison
			Parity Benchmark
	New Arrangement		
	Physical Caged	Collocation Arrangements	100% within 90 days
	Physical Cageless	Collocation Arrangements	100% within 90 days
	Virtual	Collocation Arrangements	100% within 90 days
	Other	Collocation Arrangements	100% within 90 days
	Augment Arrangement		
	Physical Caged	Collocation Arrangements	100% within 45 days
	Physical Cageless	Collocation Arrangements	100% within 45 days
	Virtual	Collocation Arrangements	100% within 45 days
	Other	Collocation Arrangements	100% within 45 days
	Business Rules	<ul style="list-style-type: none"> • Excludes orders canceled by CLEC • Excludes requests/applications that are incomplete and must be returned to CLEC for completion 	
Notes	<ul style="list-style-type: none"> • Sprint agrees to provide affiliate data to the PUC, Bureau of Consumer Protection and the CLECs under proprietary information provisions. 		

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