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December 4, 2002

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 000121C-TP

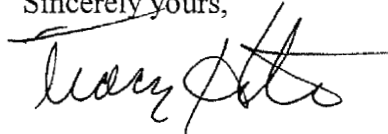
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc., MCI WorldCom Communications, Inc. MCI WorldCom Network Service, Inc. and MCI metro Access Transmission Service, LLC and DIECA Communications, Inc. d/b/a Covad Communications Company ("Joint ALECS") are an original and fifteen copies of the Comments of Joint ALECS on Staff's Proposal in the above referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,



Tracy W. Hatch

TWH/amb
Enclosure
cc: Parties of Record

DOCUMENT NUMBER-DATE

13257 DEC-4 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment) Docket No. 000121C-TP
of operations support systems permanent)
performance measures (Verizon Track)) Filed: December 4, 2002
_____)

COMMENTS OF JOINT ALECS ON STAFF'S PROPOSAL

COMES NOW AT&T Communications of the Southern States, LLC and TCG South Florida, Inc. ("AT&T"), MCI WorldCom Communications, Inc., MCI WorldCom Network Services, Inc. and MCImetro Access Transmission Services, LLC ("WorldCom"), and DIECA Communications, Inc. d/b/a Covad Communications Company (hereinafter "Joint ALECs") and pursuant to the procedural schedule in this proceeding file their comments on the Staff's Proposal.

The Joint ALECs support the preponderance of the Staff's Proposal and appreciate the work done by Staff in preparing it. The Joint ALECs note that the Staff stated that its proposed measures will provide "coverage that is comprehensive enough for this Commission *initially to* measure and assess the adequacy of Verizon's performance." (Emphasis added.) Further, while the Staff proposal does not include provisions for enforcement mechanisms at this time, the proposal does indicate that the issue of enforcement measures, incentives, and penalty plans can be addressed in the six-month review. Finally, the Joint ALEC's support is predicated on the Staff's proposal in Issue 7 for the implementation of six-month reviews, which will provide timely opportunities to seek improvements to the plan.

The Joint ALECS propose certain modifications to the Staff Proposal in Issue 1, and Issues 11 and 12.

Issue 1 – Service Quality Measures

The Staff proposed that Verizon be required to implement the twenty-four measures described in Attachment A of the Staff proposal.¹ The Joint ALECs recommend that Verizon be required to implement the same measures for which it currently reports performance in California and North Carolina.² Reporting at this level will bring Verizon's reporting requirements close to those proposed by Sprint for reporting its performance, will include more BellSouth-equivalent measures, and will therefore provide greater consistency for ALECs monitoring ILEC performance in Florida.³

Alternatively, the Joint ALECs recommend that at a minimum Verizon be required to include, in addition to those measures included in the Staff proposal, those listed below and further described in WorldCom's June 28, 2002 filing in this docket.⁴

These measures monitor key areas of ILEC service to ALECs and are reported by Verizon in other states, including California and North Carolina. Additionally, equivalent measures are reported by BellSouth in Florida and are included in the Staff proposal for Sprint's performance measurement plan in Florida as well.

Average Jeopardy Notice Interval

Held Order Interval

Out of Service < 24 Hours

Usage Completeness

¹ Verizon proposed seventeen measures, to which the Staff added seven.

² See Attachment 1 – May 29, 2001 Letter from Verizon to North Carolina Public Utilities Commission regarding implementation of California measurement changes in North Carolina.

³ As indicated in its November 15, 2002 filing in Track B of this docket, the Joint ALECs have concerns with both the existing BellSouth and proposed Sprint performance measures.

⁴ The Joint ALECS note that while changes to Verizon's performance reports, including additional measures, are being sought in the current California metrics review, they are willing to defer such requests in Florida until the first six month review.

Recurring Charge Completeness

Non-recurring Charge Completeness

Issues 11 and 12 – Audits

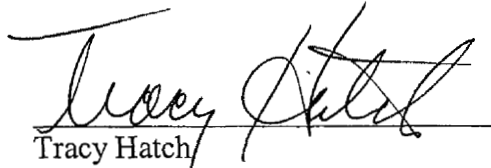
The Joint ALECs agree with the Staff's proposal that calls for annual audits, and the Joint ALECs note that the audit process currently in place for other states and recommended by Staff does allow for flexibility regarding the implementation of the audits.⁵ While the Joint ALECs do not object to this process being adopted in Florida as well, they do request modifications to the Staff proposal regarding ALEC responsibility for paying for audits of Verizon's performance reporting systems and processes.

In its proposal, the Staff recommended that the cost of the annual audits of Verizon's performance data and reports be divided 50% to the ILEC, and 50% to the ALECs. The Joint ALECs strongly believe that Verizon has an obligation to provide accurate reports, and as such also has an obligation to demonstrate that its performance reports are accurate. As the incumbent LEC and dominant market provider with the ability and the incentive to discriminate, Verizon should be required by this Commission to provide independent validation that it is providing non-discriminatory access to its OSS through accurate reporting of its performance results. The Joint ALECs urge the Staff to recommend, consistent with its position for the other ILECs operating in Florida, that Verizon be responsible for the costs associated with audits of its performance data and its reports.⁶

⁵ See Attachment 2 - November 14, 2002 letter from Verizon to North Carolina Public Utilities Commission which describes 1) the adoption of a common set of performance measures for the states of California, Hawaii, Illinois, Indiana, North Carolina, and Ohio, and 2) the adopted processes which provides for a Joint Steering Committee to determine whether an annual audit is necessary.

⁶ "Sprint's August 2002 'Cookbook' calls for Sprint to share the cost of an audit with ALECs. However, Staff believes all costs for a comprehensive annual audit should be borne by Sprint for the first five years after implementation of the Plan. This difference is consistent with past Commission decisions in similar

Respectfully filed this 4th day of December, 2002.



Tracy Hatch
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215 South Monroe Street, Suite 701
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Filing on behalf of:
AT&T Communications of the Southern
States, LLC and TCG South Florida, Inc.

MCI WorldCom Communications, Inc,
MCI WorldCom Network Services, Inc., and
MCI metro Access Transmission Services, LLC,

DIECA Communications, Inc. d/b/a Covad
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May 29, 2001

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N.C. Utilities Commission

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Exec. Dir
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Comm 3*

Ms. Geneva Thigpen, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

RE: DOCKET NO. P-100, SUB 133k - IN THE MATTER OF GENERIC DOCKET
TO ADDRESS PERFORMANCE MEASURES AND ENFORCEMENT
MECHANISMS

Dear Ms. Thigpen:

In accordance with the North Carolina Utilities Commission ("Commission" or "NCUC") Order, dated April 13, 2000, in the above-referenced matter ("Order"), Verizon South Inc. (formerly known as GTE South Incorporated) (referred to hereinafter as "Verizon South"), hereby submits notification that the California Public Utilities Commission adopted revisions to the operation support systems performance measures and standards on Thursday, May 24, 2001. In addition, this notification is provided pursuant to the Stipulation On Interim Performance Measurement Plans for GTE and Sprint which was originally submitted to the NCUC in this proceeding as a Joint Motion by various parties on April 4, 2000 (see Joint Motion at 5 and 6), and subsequently approved by the Commission in the referenced Order.

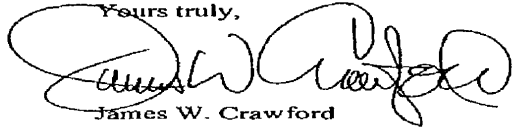
The revisions adopted by the California Public Utilities Commission came after Pacific Bell, Verizon, and a group of competitive local exchange carriers proposed the changes after completing a comprehensive review of the existing performance measures and standards. On May 24, 2001, the California Public Utilities Commission adopted the proposed revisions to the operation support systems (OSSs) performance measures and standards it had adopted in August 1999. The Order further required the implementation of these changes.

In compliance with the Joint Motion and the NCUC's Order, Verizon South will automatically implement the California changes in North Carolina coincident with their implementation in California should no party to this docket object. In order for Verizon South to complete the conversions necessary to implement the California changes any objections to these changes must be provided by June 30, 2001. Copies of the California Order will be provided upon written request to the undersigned or can be obtained by accessing the California Public Utilities Commission web site at <http://www.cpuc.ca.gov/>.

Ms Geneva Thigpen
May 29, 2001
Page 2

Please bring this filing to the attention of the Utilities Commission and if there are any questions, please contact me at your convenience.

Yours truly,



James W. Crawford

JWC:nl

c: Parties of Record

Joe W. Foster
Vice President
Public Policy And External
Affairs - North Carolina



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3 PS Comm

November 14, 2002

Ms. Geneva Thigpen, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Re: Docket No. P-100, Sub 133k - Notice of Settlement Conference Regarding An
Annual Audit of Verizon's OSS Performance Measures

Dear Ms. Thigpen:

This notice is being provided to the North Carolina Utilities Commission and the parties
of record in this matter for information.

**NOTICE TO ALL PARTICIPANTS, PARTIES AND INTERESTED PERSONS IN
STATE OSS COLLABORATIVE MEETINGS AND PROCEEDINGS FOR THE
STATES OF CALIFORNIA, HAWAII, ILLINOIS, INDIANA, NORTH CAROLINA,
AND OHIO OF A SETTLEMENT CONFERENCE REGARDING AN ANNUAL
AUDIT OF VERIZON'S OSS PERFORMANCE MEASURES**

TIME OF MEETING: 11 AM PST ON FRIDAY, NOVEMBER 22, 2002

**PLACE OF MEETING: VIA CONFERENCE CALL BY DIALING 972-650-
6443, PASSCODE 7974#**

Over the past few years, Verizon has been conducting state collaborative meetings in
California, Hawaii, Illinois, Indiana, North Carolina, and Ohio regarding its Operational
Support System (OSS) Performance Measures. These meetings have resulted in the
adoption of a common set of OSS Performance Measures for use in each of these states.
The Performance Measures and related processes are contained in a Joint Partial
Settlement Agreement (JPSA) that is applicable in each such state. The JPSA for each
state provides that a Joint Steering Committee (JSC) shall convene and determine
whether an annual audit of Verizon's OSS is necessary, and if so the scope of the audit.

The purpose of this notice is to apprise all participants, parties, and interested persons in
these collaborative processes and proceedings of a settlement conference at the time and
place indicated above to discuss whether an annual audit of Verizon's OSS Performance
Measures should occur, and if so the scope of the audit. In informal meetings held thus
far, most if not all participants have indicated that an annual audit of Verizon's OSS is

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via Hand Delivery (*) and/or U.S. Mail this 4th day of December, 2002.

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