

State of Florida



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

DATE: January 10, 2003
TO: All Parties of Record
FROM: Linda H. Dodson, Office of General Counsel
RE: Docket No. 000121A Six Month Review of BellSouth Performance Assessment Plan

Staff has analyzed the parties' comments concerning the attached list of disputed proposed changes to the BellSouth Performance Assessment Plan. As indicated on Attachment 1, staff has taken a position on each proposed change. Staff has either agreed with, disagreed with, or modified the proposals. In addition, some items are indicated to be either: no longer applicable due to action taken on a related proposal, deferred, or withdrawn by the proposing party.

In developing its position on each proposed change, staff began with the general presumption that the original Performance Evaluation Plan adopted by the Commission was correct and appropriate. In each instance, staff considered whether the proposing party had substantiated the need for each proposed change. Staff focused upon any probative new information or data that was presented in making its determination. Where applicable, staff examined the recent commercial data results for the affected measure and weighed the observable trend or results.

If you have questions or comments, please call Lisa Harvey at (850) 413-6806, Carl Vinson at (850) 413-6812, or Linda Dodson at (850) 413-6216.

LHD

cc: Division of Competitive Markets and Enforcement
f:\000121amemo5.wpd

DOCUMENT NUMBER - DATE

00347 JAN 10 8

FPSC-COMMISSION CLERK

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
1	3	BST	Pg 4, 8/30 Filing	OSS-2	MODIFY: <u>Definition</u> - Meaning of Function Availability and Schedule Availability	Withdrawn
2	11	BST	Pg 6, 8/30 Filing	O-2	Modify: <u>Benchmark</u> - From 100% to 99.5% for EDI	Disagree
3	15	BST	Pg 7, 8/30 Filing	O-7	ADD: <u>Exclusion</u> - LSRs identified as projects	Agree
4	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	Agree
5	17	BST	Pg 7, 8/30 Filing	O-11	ADD: <u>Exclusion</u> - LSRs identified as projects	Agree
6	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.	Agree w/modifications ¹
7	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.	Agree w/modifications ²
8	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	N/A
9	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)	Agree w/modifications ³
10	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	N/A

¹Staff accepts BellSouth's position with agreement to add the following "Exclusion" language: "This exclusion only applies when the technician on premises has attempted to provide service but must refer to Engineer or Cable Repair for facility jeopardy."

²Staff agrees to drop measurement P-3A; however measurement P-3 should be added to SEEM Tiers 1 and 2.

³Staff agrees to drop measurement P-4A; however, the start time for measurement P-4 should be from the "receipt of a valid LSR". Additionally, measurement P-4 should be added to SEEM Tiers 1 and 2.

STAFF'S POSITION ON DISPUTED ISSUES
 Florida BellSouth Performance Assessment Plan
 Six Month Review
 as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
11	29	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	ADD: Exclusion - 2)trunk groups blocked due to ALEC delayed or refused orders	Agree
12	30	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	ADD: Exclusion - 3)trunk groups blocked due to unanticipated significant increases in ALEC traffic	Agree
13	32	BST	Pg 15, 8/30 Filing	TGP-1, TGP-2	MODIFY BENCHMARK: 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"	Agree
14	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.	Withdrawn

SQM Changes - EXHIBIT 3

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
15	15	BST	Exhibit 3	PO-2	Business Rules-Delete references to "LENS"	Agree w/modifications ⁴
16	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)	Disagree w/modifications ⁵
17	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	Agree
18	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 PRI</u>	Agree
19	25	BST	Exhibit 3	P-3	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark UNE Line Splitting <u>ADSL Provided to Retail</u>	Agree
20	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	N/A
21	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 PRI</u>	N/A
22	28	BST	Exhibit 3	P-3A	Changes to SQM Disagg-Analog/Benchmark: LEVEL of Disagg SQM Analog/Benchmark UNE Line Splitting <u>ADSL Provided to Retail</u>	N/A

⁴Staff agrees with BellSouth's position with the understanding that BellSouth will add clarifying language to SQM stating that "LSRs submitted via LENS will be reflected in the results for the TAG interface.

⁵Staff contends that CLEC answer time should be compared to BellSouth "business".

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Ref	Metric	Proposal	Staff's Position
23	2	ALEC	Pg 7, 8/30 Filing	P-1	ADD to SEEM: • Mean Held Order Interval	Disagree
24	3	ALEC	Pg 7, 8/30 Filing	P-2	ADD to SEEM: • Jeopardy Notice Intvl & % Orders Given Jeopardy Notice	Disagree
25	4	ALEC	Pg 7, 8/30 Filing	P-5	ADD to SEEM: • Avg Completion Notice Intvl	Agree ⁶
26	5	ALEC	Pg 8, 8/30 Filing	B-9	ADD to SEEM: • % Daily Usage Feed Errors Corrected in X Bus Days	Withdrawn
27	6	ALEC	Pg 8, 8/30 Filing	B-5	ADD to SEEM: • Usage Data Delivery Timeliness	Disagree
28	7	ALEC	Pg 8, 8/30 Filing	B-10	ADD to SEEM: • % Billing Errors Correct in X Days	Defer ⁷
29	8	ALEC	Pg 8, 8/30 Filing	CM-2	ADD to SEEM: • Change Mgmt Notice Avg Delay Days	Disagree
30	9	ALEC	Pg 8, 8/30 Filing	CM-4	ADD to SEEM: • Change Mgmt Documentation-Avg Delay Days	Disagree
31	10	ALEC	Pg 8, 8/30 Filing	CM-9	ADD to SEEM: • Number of Defects in Production Releases (Type 6 CR)	Disagree
32	13	ALEC	Pg 8, 8/30 Filing	P-11	ADD to Tier 1, once BST has mechanized this measure	Disagree

⁶P-5 should be added to SEEM Tiers 1 and 2 with the understanding that measurement P-4A will be removed

⁷Staff is currently conducting an audit of billing dispute process. Staff will consider changes to this metric at next six-month review or sooner upon completion of audit.

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Ref	Metric	Proposal	Staff's Position
33	15-24	ALEC	Pg 9, 8/30 Filing	PARIS	ADD: Info in PARIS reports for each submeasure • Tier I Metric ADD: Info in PARIS reports for each submeasure • Truncated Z-Score ADD: Info in PARIS reports for each submeasure • Balancing Critical Value ADD: Info in PARIS reports for each submeasure • Pass/Fail Indication ADD: Info in PARIS reports for each submeasure • Benchmark % ADD: Info in PARIS reports for each submeasure • BST Metric Result ADD: Info in PARIS reports for each submeasure • ALEC Metric Result ADD: Info in PARIS reports for each submeasure • Total ALEC Volume ADD: Info in PARIS reports for each submeasure • Fee Schedule Amount ADD: Info in PARIS reports for each submeasure • Remedy Paid	Disagree
34	29	ALEC	Pg 10, 8/30 Filing	CM-6	MODIFY: More significant remedy payment (\$35,000)	Disagree
35	30	ALEC	Pg 10, 8/30 Filing	CM-7	MODIFY: More significant remedy payment	Disagree
36	31	ALEC	Pg 10, 8/30 Filing	CM-11	MODIFY: More significant remedy payment (\$100,000)	Disagree
37	32	ALEC	Pg 11, 8/30 Filing	NEW SQM	ADD: <u>SQM</u> - Special Access Metrics	Defer ⁸
38	33	ALEC	Pg 15, 8/30 Filing	NEW SQM	ADD: <u>SQM</u> - Ordering Trouble Ticket Responses in 48 Hours	Disagree

⁸Staff will address this issue in a separate recommendation within this proceeding.

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Ref	Metric	Proposal	Staff's Position
39	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	Disagree
40	36	ALEC	Pg 17, 8/30 Filing	ADM	Raw data necessary to verify accuracy of BST's reports should be made available	Agree ⁹
41	37	ALEC	Pg 18, 8/30 Filing	ADM	BST should be required to respond to requests for data reconciliation in a timely manner	Agree ¹⁰
42	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	Defer ¹¹

⁹BellSouth's proposal of providing OSDF information should satisfy the ALECs request of including "excluded" raw data.

¹⁰Staff agrees that BellSouth should implement two of three proposals to satisfy the ALECs request: 1) make an initial acknowledgement of receipt of the request. 2) provide a committed due date for a response within five business days of the request. Additionally, staff requests that BellSouth's reconciliation policy be posted to BellSouth's PMAP website.

¹¹Staff is currently evaluating BellSouth's reposting policy. Staff requests that BellSouth's reposting policy be added to the SEEM Administrative Plan.

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
ALEC SQM Redline						
43	1	ALEC	PG 4, ALEC Modified Redline	CM-9	MODIFY: Add as Tier I & II Penalty	Disagree
44	2	ALEC	PG 4, ALEC Modified Redline	OSS-2	MODIFY: Business Rules regarding downtime.	Disagree
45	4	ALEC	PG 7, ALEC Modified Redline	OSS-3	MODIFY: Business Rules regarding downtime.	Disagree
46	8, 9	ALEC	PG 21, ALEC Modified Redline	O-3 O-4	MODIFY: Benchmark to include UNE-P at 95% and UNE and LNP at 90%.	Agree ¹²
47	10	ALEC	PG 31, ALEC Modified Redline	O-8	DELETE: Exclusion for "LSRs identified as projects".	Disagree
48	11	ALEC	PG 31, ALEC Modified Redline	O-8	MODIFY: Change exclusion "LCSC" to "center(s)".	Disagree
49	12	ALEC	PG 33, ALEC Modified Redline	O-8	MODIFY: Disagg to include projects (diagnostic).	Disagree
50	13	ALEC	PG 33, ALEC Modified Redline	O-8	MODIFY: Benchmark for partially mech to ≤ 5 hrs and non-mech to ≤ 10 hrs.	Defer ¹³
51	14	ALEC	PG 35, ALEC Modified Redline	O-9	DELETE: Exclusion for "LSRs identified as projects".	Disagree

¹²Staff proposes the following modifications to the benchmarks based on historical performance with UNE-P separated from UNE: UNE at 85%, UNE-P at 90%, and LNP at 95%.

¹³Deferred until next six-month review. Staff's examination of commerial data proved to be inconclusive. Only have three months of data were these benchmarks were changed.

STAFF'S POSITION ON DISPUTED ISSUES

Florida BellSouth Performance Assessment Plan

Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
52	16	ALEC	PG 38, ALEC Modified Redline	O-9	MODIFY: Disagg to include projects (diagnostic).	Disagree
53	17	ALEC	PG 38, ALEC Modified Redline	O-9	MODIFY: Benchmark for partially mech to ≤ 5 hrs and non-mech to ≤ 10 hrs.	Disagree
54	19	ALEC	PG 42, ALEC Modified Redline	O-11	MODIFY: Benchmark from 95% to 97%.	Disagree
55	20	ALEC	PG 43, ALEC Modified Redline	O-12	DELETE: Business Rules - eliminate "service" & "LCSC".	Disagree
56	21	ALEC	PG 43, ALEC Modified Redline	O-12	ADD: Report Structure-CRSG and EC Support Desk.	Disagree
57	22	ALEC	PG 43, ALEC Modified Redline	O-12	DELETE: Data retained - Delete "LCSC".	Disagree
58	23, 24	ALEC	PG 43, ALEC Modified Redline	O-12	ADD: Disagg-CRSG - Parity with Retail ADD: Disagg: EC Support Desk-Parity with Retail	Disagree
59	26	ALEC	PG 48, ALEC Modified Redline	P-1	ADD: Disagg-word "industrial" after ADSL.	Withdrawn
60	27	ALEC	PG 50, ALEC Modified Redline	P-2	ADD: Disagg-word "industrial" after ADSL.	Withdrawn
61	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".	Disagree
62	30	ALEC	PG 55, ALEC Modified Redline	P-3A	MODIFY: Exclusion "Canceled Service Order" and replace w/"Orders canceled prior to the due date"	N/A

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
63	31	ALEC	PG 55, ALEC Modified Redline	P-3A	DELETE: Exclusion for "Disconnect (D) & From (F) orders"	N/A
64	32	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-UNE UDC/IDSL - Benchmark of Retail ISDN-BRI.	N/A
65	33	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-ALEC disconnect requests-dispatch - Benchmark of 95% on time.	N/A
66	34	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-ALEC disconnect requests-central office - Benchmark of 95% on time.	N/A
67	35	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-BST disconnects due to migrations-dispatch - Benchmark of 95% on time.	N/A
68	36	ALEC	PG 56, ALEC Modified Redline	P-3A	ADD: SQM Disagg-BST disconnect due to migrations-central office - Benchmark of 95% on time.	N/A
69	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.	N/A ¹⁴
70	39	ALEC	PG 62, ALEC Modified Redline	P-4A	ADD: SQM Disagg - UNE UCL (Non-Design) - Benchmark of 5 Days.	N/A
71	40	ALEC	PG 62, ALEC Modified Redline	P-4A	ADD: UNE UDC/ISDL - Benchmark of Retail ISDN-BRI.	N/A ¹⁵
72	41	ALEC	PG 62, ALEC Modified Redline	P-4A	ADD: SQM Disagg - Word "industrial" after ADSL.	Withdrawn

¹⁴Staff agrees with ALECs position to modify business rules; however, the change should be made to measurement P-4 since staff has agreed to remove measurement P-4A.

¹⁵UNE UDC/IDSL should be compared to the retail analog ISDN-BRI and PRI for measurement P-4 since staff has agreed to remove measurement P-4A.

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
73	44	ALEC	PG 66, ALEC Modified Redline	P-5	ADD: SEEM: Add to Tier I and Tier II.	Disagree
74	45	ALEC	PG 66, ALEC Modified Redline	P-5	MODIFY: SEEM Disagg-Remove "Not Applicable" and replace w/"Same as SQM disagg and benchmark/analog above".	Disagree
75	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"	Agree w/modifications ¹⁶
76	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"	Agree w/modifications ¹⁷
77	50	ALEC	PG 76, ALEC Modified Redline	P-7C	MODIFY: SQM Disagg - replace "5%" with "3%".	Agree
78	52	ALEC	PG 80, ALEC Modified Redline	P-9	ADD: SQM Disagg - Word "industrial" after ADSL.	Withdrawn
79	53	ALEC	PG 82, ALEC Modified Redline	P-10	DELETE: Delete SQM and modify average completion interval as noted.	Agree ¹⁸
80	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.	Disagree ¹⁹

¹⁶Staff proposes the INP benchmark to be at 100% within 4 hours.

¹⁷Staff proposes the LNP benchmark to be at 100% within 4 hours.

¹⁸Staff agrees with the ALECs position to delete SQM; however, the modified interval would be changed to measurement P-4 since staff has agreed to remove measurement P-4A.

¹⁹Staff proposes that BellSouth sample partially mechanized orders. Fully-mechanized and non-mechanized orders would not be sampled.

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
81	55	ALEC	PG 86, ALEC Modified Redline	P-11	DELETE: Exclusion for "Listing Orders".	Disagree
82	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."	-N/A
83	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"	N/A
84	58	ALEC	PG 86, ALEC Modified Redline	P-11	ADD: Business Rules - add "non-mechanized" before service orders.	N/A
85	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".	N/A
86	60	ALEC	PG 86, ALEC Modified Redline	P-11	ADD: Calculation-Add "Manually Handled" before "orders completed".	N/A
87	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".	Disagree
88	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"	Disagree
89	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"	Disagree
90	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"	Disagree

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
91	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"	Disagree
92	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."	Disagree
93	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"	Disagree
94	74	ALEC	PG 118, ALEC Modified Redline	B-5	ADD: SEEM - Add to Tier I and Tier II.	Disagree
95	75	ALEC	PG 118, ALEC Modified Redline	B-5	MODIFY: SEEM Disagg-Replace "Not applicable" with "Parity with Retail".	Disagree
96	83	ALEC	PG 127, ALEC Modified Redline	B-10	MODIFY: SQM Disagg - Replace "Diagnostic" with "95% within interval"	Defer ²⁰
97	84	ALEC	PG 127, ALEC Modified Redline	B-10	MODIFY: SEEM Disagg - Replace "Not Applicable" with "State".	Defer ²¹
98	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."	Disagree
99	91	ALEC	PG 143, ALEC Modified Redline	TGP-1	ADD: Benchmark-Add "hours do not have to be consecutive"	Disagree

²⁰Staff is currently conducting an audit of billing dispute process. Staff will consider changes to this metric at next six-month review or sooner upon completion of audit.

²¹Ibid.

STAFF'S POSITION ON DISPUTED ISSUES
Florida BellSouth Performance Assessment Plan
Six Month Review
as of January 9, 2003

Item	Original No.	Proposer	Reference	Metric	Proposal	Staff's Position
100	92	ALEC	PG 143, ALEC Modified Redline	TGP-1	DELETE: Benchmark-Delete "by more than .5%"	Disagree
101	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."	Disagree
102	94	ALEC	PG 146, ALEC Modified Redline	TGP-2	ADD: Benchmark-Add "does not have to be consecutive"	Disagree
103	95	ALEC	PG 146, ALEC Modified Redline	TGP-2	DELETE: Benchmark-Delete "by more than .5%"	Disagree
104	98	ALEC	PG 154, ALEC Modified Redline	CM-2	MODIFY: SEEM Disagg-Replace "Not Applicable" with "Region"	Disagree
105	99	ALEC	PG 154, ALEC Modified Redline	CM-2	MODIFY: SEEM Disagg-Replace "Not Applicable" with "<+ 5 Days".	Disagree
106	100	ALEC	PG 155, ALEC Modified Redline	CM-3	ADD: SEEM - Add to Tier I.	Disagree
107	101	ALEC	PG 156, ALEC Modified Redline	CM-4	MODIFY: SEEM Disagg-Replace "Not Applicable" with "Region"	Disagree
108	102	ALEC	PG 156, ALEC Modified Redline	CM-4	MODIFY: SEEM Disagg-Replace "Not Applicable" with "<+ 5 Days".	Disagree
109	104	ALEC	Pg 170, BST Redline	CM-10	Need weighting table for software validation metric.	Agree