

LAW OFFICES
Messer, Capareello & Self
A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

Reply to: P.O. Box 1876
Tallahassee, FL 32302-1876

February 7, 2003

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. 000121A-TP

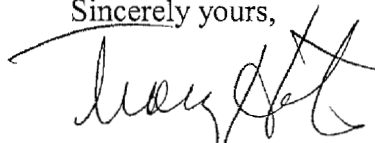
Dear Ms. Bayó:

Enclosed for filing on behalf of the ALEC Coalition are an original and fifteen copies of the Comments of ALEC Coalition Concerning BellSouth's Response to Staff Questions from January 22, 2003 Conference call Regarding Service Quality Measurements 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
Enclosures
cc: Virginia Tate, Esq.
Parties of Record

DOCUMENT NUMBER DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)	
of Operations Support System Permanent)	Docket No. 000121A-TP
Performance Measures for Incumbent)	
Local Exchange Telecommunications)	Filed: February 7, 2003
Companies (BellSouth Track))	
_____)	

**COMMENTS OF ALEC COALITION
CONCERNING BELL SOUTH'S RESPONSE TO STAFF QUESTIONS FROM
JANUARY 22, 2003 CONFERENCE CALL REGARDING SERVICE QUALITY
MEASUREMENTS**

The members of the ALEC Coalition¹ hereby submit their comments to BellSouth's January 30, 2003 filing.

Item 4- Original Issue 16

In Florida, BellSouth is required to do a facilities check prior to returning a FOC. BellSouth was directed by the Commission to raise the issue of any proposed changes to the FOC Timeliness measurement resulting from this requirement in the six-month review of performance measures. In its November 19, 2002 filing in this docket BellSouth said

the results of the analysis thus far *shows that the facilities check for about 2% of the LSRS adds one minute or more* to the FOC time. As a result, the requirement for a facilities check could cause the measurement to be missed *for these LSRS* under the existing benchmark of 95% within 3 hours for Fully Mechanized Firm Order Confirmation Timeliness. Consequently this data would indicate that the benchmark should be reduced to 93% within 3 hours. As an alternative to recommending an across the board change in the benchmark for FOC Timeliness, BellSouth requests that it be allowed to conduct further analysis of this data over a longer period to determine if certain product groups or ordering types are

¹ For purposes of these comments, the ALEC Coalition consists of AT&T Communications of the Southern States, Inc., ("AT&T"), WorldCom, Inc. ("WorldCom"), DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), and ITC^DeltaCom, Inc. ("DeltaCom").

consistently affected by the requirement for an electronic facility check. Under this alternative approach, BellSouth would submit the data and recommendations prior to the conclusion of these proceedings. (Emphasis added)

However, in its January 30, 2003 filing, BellSouth provides a very different analysis with a different proposed benchmark, and does not mention any results of the product group or ordering type analysis it had requested it be allowed to conduct in its November filing. BellSouth now states that the rationale for changing the benchmark for Fully Mechanized FOCs from 95% within 3 hours to 94% within 3 hours is that

for approximately 1% of the LSRS, the incremental time to perform the electronic facilities check consumes half (or more) of the allotted 3-hour interval to perform all the functions required prior to the return of a Fully Mechanized FOC. Consequently, to account for the additional time required to perform the electronic facility check, BellSouth proposes to reduce the benchmark for Fully Mechanized FOC Timeliness by 1%.

BellSouth's proposal should be rejected for the following reasons:

1. BellSouth is requesting an across the board reduction when a review of BellSouth's performance data indicates problems meeting the benchmark in only a very few sub-measures. As noted above, BellSouth produced no results in its filings of the requested analysis of product groups or order types.

A review of the BellSouth performance reports for UNE² Fully Mechanized FOCs indicated misses as follows:

² The ALEC Coalition assumes BellSouth is not conducting facilities checks for resale, and does not understand why they would for UNE-P, however due to the volume reported by BellSouth in its January 30 filing (e.g. 56,339 for November), it appears UNE-P is included. Further, Covad has been advised by BellSouth that it is not conducting facilities checks for line-sharing and line-splitting, which have similar facilities issues to other loops and should have a facilities check. BellSouth missed no resale or UNE-P sub-metrics for fully mechanized FOCS during the 5 month period reviewed.

Month	Missed Fully Mechanized FOC Sub-measures
August	ISDN Loop 2 wire analog loop design 2 wire analog loop w/LNP Design Digital loop < DS1
September	2 wire analog loop w/LNP Design
October	ISDN Loop 2 wire analog loop w/LNP Design 2 wire analog loop w/LNP Non-Design Digital loop < DS1
November	2 wire analog loop w/LNP Design 2 wire analog loop w/LNP Non-Design, Digital loop < DS1
December	2 wire analog loop w/LNP Design

2. Further, based on the December CLEC Aggregate SQM report obtained from BellSouth's PMAP web-site attached as Exhibit 1, except for the one missed sub-measure, BellSouth returned the vast majority of the FOCS in 30 minutes, leaving an extra hour in addition to the one and one half hours cited by BellSouth as the rationale supporting its need for a reduced benchmark.

In summary, BellSouth has produced no data in support of its request that the FOC performance standard should be lessened for all sub-measures. In fact, BellSouth's reported data indicates that it is performing far better than the current 95% within 3 hour standard for many sub-measures. Thus, the ALEC Coalition recommends rejection of BellSouth's request. Alternatively, BellSouth should be required to file its SQM reports (such as Exhibit 1) for this measure for the period of time it has implemented the facilities check, and additionally provide supporting data indicating the number of facilities checks by sub-measure, and the range and average time of the facilities checks

to assist the Staff in assessing the impact of facilities checks on the various FOC sub-measures and the assignment of any change in benchmark.³

Item 81 – Original Issue No. 55

Item 81 addressed the exclusion of listing orders from the Service Order Accuracy measure. ALECs had asked that this exclusion be removed, but the Staff proposal disagreed with the ALEC position. In its January 30 response, BellSouth indicated that in Georgia, (and presumably in Florida), it will measure the accuracy of LIDB, Directory Listings, and Directory Assistance databases for all directory listings included on error free service orders, regardless of whether that order for directory listings was submitted alone or in conjunction with other service requests. However, for the service order accuracy measure, which measures the accuracy of other databases such as SOCS and associated downstream systems such as Customer Records Information System (CRIS), BellSouth will measure the accuracy of listing information only if it is included as part of an LSR for other service, but not if the order is for directory listings services alone. This approach is illogical on its face. It is important that all directory listings information be accurate in all BellSouth's databases. The method of ordering directory listings, whether individually or in combination with other services, is completely irrelevant to the issue of accuracy. The ALECs therefore request that BellSouth be required to measure the accuracy of directory listings in the service order accuracy measure, regardless of whether the listings were ordered as a stand-alone item or in conjunction with other services.

³ The ALEC Coalition requests that the Staff take note that BellSouth is fully aware that it must report its results at the sub-measure level and it recommended a reduction of one percent. Thus, any requests for a greater reduction in any future analysis should be subject to significant scrutiny.

Items 9 and 10-Original Issues No 23 and 24

In their August 30 and November 19, 2002 comments, the ALECs recommended that the start time for P4-A Average Completion Interval be changed from “when a valid order number is assigned in SOCs” to “when BellSouth first receives a valid LSR or ASR.” The ALECs explained that this change was required to reflect the customer experience and to make an accurate parity determination. The ALECs also pointed out that Sprint (including Florida as recently ordered by this Commission), Verizon, Qwest, and SBC’s similar performance measures begin this interval with the date that a valid LSR is received, not when the order is entered in the legacy system as does BellSouth. Further, Verizon, Qwest, SBC, and Sprint (in some jurisdictions) include both metrics covering whether ALEC’s receive the standard interval when they request it and the FOC Interval measures in their penalty plans.

In its January 10, 2003 proposal, Staff agreed with ALEC position to modify the business rules to use the receipt of a valid LSR as the starting point for the OCI measure.⁴ In response to Staff’s proposal, BellSouth filed a revised SQM for P-4, ostensibly to account for the new start time for this measure. However, BellSouth also made other unnecessary and onerous changes to both the O-9 FOC Timeliness and (P4) Order Completion Interval measures which render both measures fatally flawed.

BellSouth’s revised SQM (Exhibit 1 of its January 30 filing) excludes the FOC measure from the penalty plan. In recommending this change, BellSouth contends that it would be subject to dual penalties for the same failure. However, these two processes,

⁴ The Staff noted that the change should be made to measure P-4 since Staff has agreed to remove measurement P4-A.

the provision of a FOC and provision of a non-discriminatory interval for order completion, are separate and discrete processes, and impact the customer experience discretely. For example, according to BellSouth processes, an ALEC cannot even initiate the multi-stage process of porting of a number until it receives a FOC and must use the due date on the FOC. Thus, untimely FOCs can have an adverse impact on an ALEC's ability to port a number. Additionally, ALECs need FOCs in a timely manner to advise or answer customer questions about the due date and as the first indicator that the customer's order is progressing toward a specific delivery date and is not snagged in BellSouth's processes. Even if the order is ultimately delivered within the standard interval, delays in receiving the FOC can harm the ALEC-customer relationship.

Further, certain order types are excluded in the (P-4) OCI measure that are not excluded from the FOC measure. Thus, if not included in the penalty plan as part of the FOC measure, FOCs for these order types would be subject to no level of enforcement at all. For example, the following are currently excluded from the OCI measure, but are included in the FOC measure and are subject to penalties:

- Order activities associated with administrative use of local services such as record and listing orders;
- Disconnect orders;
- "L" appointment coded orders (where the customer has requested a later than offered interval); and
- End-user caused missed appointments.

The timely return of a FOC has long been a critical aspect of the process providing service to an ALEC's customer, and as such has been an essential part of the Florida Third Party Test, BellSouth's performance reporting, and the penalty plan, all ordered by this Commission. FOCs are measured and included in the penalty plans of all

ILECs, including those that begin the measurement of the Order Completion Interval with the receipt of a valid LSR. Accordingly, the Commission should reject BellSouth's revised SQM that excludes the FOC measure from the penalty plan. No changes to the FOC measure are required or are appropriate to implement the Staff's proposal.

BellSouth's revised SQM for the (P-4) OCI measure is equally flawed. In addition to its stated purpose of changing the business rules to comply with the Staff's proposal, BellSouth also modified the retail analog for this measure to add one-half day to the interval for fully mechanized orders, a full day for partially mechanized orders, and two and one half days for non-mechanized orders. BellSouth also added FOC exclusions for this measure, with the outcome of "double dipping" exclusions. For example, it included the business rule that excludes non-business hours for non-mechanized orders. Yet it also added two and one-half days to the retail analog interval for non-mechanized orders. Similarly, projects are currently excluded from the FOC measure but not the OCI. In BellSouth's revised SQMs, projects are excluded from both.

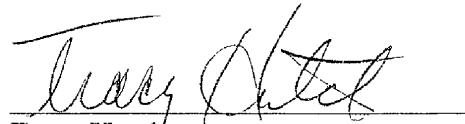
The result of BellSouth's proposed changes would be the complete obliteration of the stated intent of the ALEC request agreed to by Staff. BellSouth's SQM revisions also serve as an admission by BellSouth that an ALEC's customer does not receive a non-discriminatory interval for its orders for service, compared to BellSouth's retail customers.⁵

In summary, Staff should reaffirm its current proposal which requires BellSouth to maintain the critical FOC measurement in its penalty plan, and requires BellSouth to

⁵ BellSouth's proposal actually reduces its current requirements. For example, while required to return FOCS for fully mechanized orders in three hours, its proposal now gives it half a business day. If the Staff were to adopt seven hours for partially mechanized orders, this proposal immediately extends BellSouth's actual obligation to a full day.

measure its Order Completion Interval the same way as other ILECs, including other ILECs in Florida, measure their performance.

Respectfully filed this 7th day of February, 2003.



Tracy Hatch
Messer, Caparello and Self, PA
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
(850) 222-0720

For:

AT&T Communications of the
Southern States, LLC; TCG
South Florida, Inc.

MCI WorldCom, Inc.; MCImetro Access
Transmission Services, LLC

ITC^DeltaCom Communications, Inc.

DIECA Communications Company d/b/a
Covad Communications Company

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Report: FOC Timeliness Fully Mech SQM - FL

		December 2002															
Aggregate	State	Ordering Products	0 - <= 15 min	>15 - <= 30 min	>30 - <=45 min	>45 - <=60 min	>60 - <=90 min	>90 - <=120 min	>120 - <=180 min	0 - <=3 hrs	>3 - <=6 hrs	>6 - <=12 hrs	>12 - <=24 hrs	>24 - <=48 hrs	>48 hrs	Avg. Intvl (hours)	
CLEC	FL	Resale Business	85.45%	13.18%		0.17%			0.34%	99.14%	0.17%	0.17%	0.17%		0.34%	0.45	
		Resale Residence	87.05%	11.61%	0.21%	0.17%	0.11%	0.07%	0.05%	99.26%	0.09%	0.11%	0.32%	0.06%	0.16%	0.44	
		2W Analog Loop Design	76.09%	17.59%	1.05%	0.60%	0.60%	0.45%	0.45%	96.84%	0.90%	0.75%	0.45%	0.60%	0.45%	0.91	
		2W Analog Loop Non-Design	85.56%	11.58%	0.85%	0.77%	0.31%	0.08%	0.08%	99.23%	0.15%	0.23%	0.08%	0.15%	0.15%	0.65	
		2W Analog Loop w/LNP - Design	40.00%	10.00%					10.00%	60.00%	30.00%	10.00%					2.75
		UNE Loop + Port Combinations	79.17%	16.30%	0.94%	0.77%	0.45%	0.31%	0.43%	98.39%	0.34%	0.34%	0.67%	0.14%	0.12%	0.55	
		UNE Digital Loop < DS1	78.05%	19.51%						97.56%						2.44%	1.60
		UNE Digital Loop => DS1	67.93%	19.41%	3.38%	1.69%	2.53%	1.27%		96.20%	1.69%	1.27%	0.42%		0.42%	0.75	
		UNE ISDN	78.05%	19.51%						97.56%						2.44%	1.60
		UNE Line Sharing	97.20%	0.31%	1.40%	0.16%			0.47%	99.53%	0.31%		0.16%			0.17	
		LNP (Standalone)	98.37%	0.72%	0.27%					99.37%						0.63%	5.37
		UNE Other Non-Design	94.32%	0.65%	3.30%	1.24%	0.13%	0.04%	0.08%	99.77%	0.18%	0.01%	0.01%		0.03%	0.20	
		UNE xDSL (HDSL, ADSL, and UCL)	71.92%	20.60%	2.10%	0.13%	0.66%	0.52%	0.52%	96.46%	1.05%	0.79%	0.92%	0.39%	0.39%	0.74	
		EELs	100.00%							100.00%							0.00

This report has footnotes associated with it. [Click here to see the footnotes for this Ordering report.](#)

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EXHIBIT 1

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following parties by Hand Delivery (*) and/or U.S. Mail this 7th day of February, 2003.

Beth Keating, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White, Esq.
c/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

David Tobin, Esq.
Florida Public Telecommunications Association
%Tobin & Reyes
7251 West Palmetto Park Road, #205
Boca Raton, FL 33433-3487

Charles J. Rehwinkel, Esq.
Susan Masterton, Esq.
Mr. F. Ben Poag
Sprint-Florida, Incorporated
MC FLTHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

Michael A. Gross, Esq.
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications Association, Inc.
246 East 6th Avenue
Tallahassee, FL 32303

Donna McNulty, Esq.
WorldCom, Inc.
1203 Governors Square Blvd, Suite 201
Tallahassee, FL 32301-2960

J. Jeffry Wahlen, Esq.
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Ms. Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Claudia E. Davant, Esq.
AT&T Communications of the Southern States, LLC
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

Virginia C. Tate, Esq.
AT&T Communications of the Southern States, LLC
1200 Peachtree Street, Suite 8100
Atlanta, GA 30309

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

Mr. Dulaney L. O'Roark, III
WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

Kimberly Caswell, Esq.
Verizon Select Services, Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

William H. Weber
Senior Counsel
Covad Communications Company
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309

Richard Melson, Esq.
Hopping Law Firm
P.O. Box 6526
Tallahassee, FL 32314

Nanette Edwards, Esq.
Brian Musselwhite, Esq.
ITC^Deltacom
4092 South Memorial Parkway
Huntsville, AL 35802

Patrick Wiggins, Esq.
Charles Pellegrini, Esq.
Katz Kutter Law Firm
106 East College Avenue, 12th Floor
Tallahassee, FL 32301

Jonathan Canis, Esq.
Michael Hazzard, Esq.
Kelley Drye Law Firm
1200 19th Street, NW Fifth Floor
Washington, DC 20036

Mr. John D. McLaughlin, Jr.
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, GA 30043

Joseph McGlothlin, Esq.
Vicki Kaufman, Esq.
McWhirter Law firm
117 S. Gadsden Street
Tallahassee, FL 32301

Laura L. Gallagher, P.A.
101 E. College Avenue, Suite 302
Tallahassee, FL 32301

Ms. Carol Paulsen
SBC Telecom, Inc.
130 E. Travis, 4-10-A
San Antonio, TX 78205

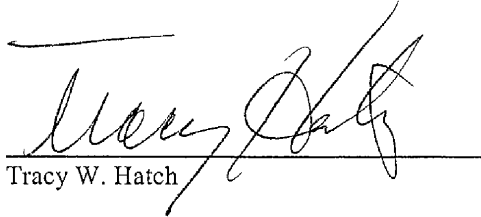
Wayne Stavanja, Esq.
Mark Buechele, Esq.
Supra Telecom
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32301

Mr. John Rubino
Mr. George S. Ford
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602-5706

Mr. Angel Leiro
Mr. Joe Millstone
IDS Telcom, LLC
1525 N. W. 167th Street, Second Floor
Miami, FL 33169-5131

Mr. David Woodsmall
Mpower Communications Corp.
175 Sully's Trail, Suite 300
Pittsford, NY 14534-4558

Suzanne F. Summerlin, Esq.
2536 Capital Medical Blvd.
Tallahassee, FL 32309



Tracy W. Hatch