

ORIGINAL

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 Sent: Friday, June 25, 2004 2:36 PM  
 To: Filings@psc.state.fl.us  
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 Subject: 0001212A-TP

Pursuant to the Commission's procedures for e-filing, Covad Communications provides the following information:

a. The attorney responsible for the filing is:

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b. The document is to be filed in Docket No. 000121A-TP, Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth Track)

c. The document is filed on behalf of Covad Communications

d. The document is 2 pages long.

d. The document is a transmittal letter and an outline of Covad's presentation to be made at the July 1, 2004 workshop.

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Outline of Covad presentation

Title: **Why the audit should** look at BellSouth's incremental changes of performance measures since 2002.

- I. Overview
  - a. **BellSouth** has modified measures over 1,000 times since April 2002
  - b. **Almost** every measure has been modified
  - c. **Changes** have the affect of improving performance (and reducing penallies) without actually improving performance
  - d. SEEM payments have been decreasing without any noticeable improvement in performance
- II. Procedures do not allow examination of methodology
  - a. Notice of minor changes
  - b. **CLEC objections specific to** minor change
  - c. **BellSouth unilateral answer**
  - d. **Possible appeal to PSC limited to** minor change
  - e. **Allows for "Death by 1000 cuts"**
- III. There is no transparency
  - a. How are changes developed? We don't know.
  - b. How are changes prioritized? We don't know.
  - c. How are changed implemented? We don't know.
  - d. Are projected impacts to measures accurate? We don't know.
  - e. Are backward-applied reimburses of penalty payments by BellSouth to itself applied accurately and fairly? We don't know.
  - f. **Has BellSouth identified upward adjustments but not made them?** We don't know.
- IV. What the audit should examine
  - a. **The process BellSouth uses** to identify, prioritize and implement changes to measures
  - b. Whether those processes are properly documented
  - c. Whether changes were implemented accurately
  - d. The accuracy of BellSouth's projections about the impact to measures
  - e. Whether BellSouth has fairly and accurately applied backward reimbursements to itself
  - f. Whether BellSouth has identified any appropriate changes but not made them

Presentation time: 30 minutes

Presenter: **Charles E.** (Gene) Watkins, Senior Counsel, Covad Communications