

ORIGINAL

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Sent: Wednesday, October 20, 2004 1:11 PM
To: Filings@psc.state.fl.us
Cc: Culpepper, Robert; Fatool, Vicki; Nancy Sims; Holland, Robyn P; Slaughter, Brenda ; Linda Hobbs; Bixler, Micheale
Subject: Florida Docket No. 000121A-TP
Importance: High

A. Debbie Smith
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CMP _____
 COM 3
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 MMS _____
 RCA _____
 SCR _____
 SEC 1
 OTH _____

B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth Track).

C. BellSouth Telecommunications, Inc.
 on behalf of Robert A. Culpepper

D. 17 pages total in PDF format

E. BellSouth Telecommunications, Inc.'s Responses to Action Items raised during the SQM Workshop held on October 7.

Debbie Smith (sent on behalf of Robert A. Culpepper)
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<<Bayo Letter and Certificate of Service>> <<Appendix B - Attachment>> <<Responses to 10-7-04 Workshop Action Items>>
 <<Appendix D - Attachment>> <<FL Prop. SQM Disaggregation Rollups>>

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Legal Department

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October 20, 2004


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

Re: Docket No. 000121A-TP
**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

Enclosed are BellSouth Telecommunications, Inc.'s Responses to Action Items raised during the SQM Workshop held on October 7, which we ask that you file in the captioned docket. A copy of the same is being provided to all parties as reflected in the attached certificate of service.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record
Marshall M. Criser, III
Nancy B. White
R. Douglas Lackey

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 20th day of October, 2004 to the following:

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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

Appendix CB: BellSouth Audit Policy

~~C-1: BellSouth's Internal Audit Policy~~

~~BellSouth's internal efforts to make certain that the reports produced by the PMAP platform are of the highest accuracy has been formalized into a Performance Measurements Quality Assurance Plan (PMQAP) that documents and augments existing quality assurance processes integral to the production and validation of Performance Measurements data.~~

~~The plan consists of three sections:~~

- ~~1. Change Control addresses the quality assurance steps involved in the introduction of new measurements and changes to existing measurements.~~
- ~~2. Production addresses the quality assurance steps used to create monthly SQM reports.~~
- ~~3. Monthly Validation addresses the quality assurance steps used to ensure accurate posting of monthly results.~~

~~The BellSouth PMQAP will ensure that BellSouth effectively and consistently provides accurate performance measurements data for the activities included in the SQM. The BellSouth Internal Audit department will audit this plan and its quality assurance steps annually, beginning in 4Q04.~~

~~C-2: BellSouth's External Audit Policy~~

~~BellSouth currently provides many CLECs with certain audit rights as a part of their individual interconnection agreements. However, it is not reasonable for BellSouth to undergo a process audit of the SQM for every CLEC with which it has a contract. BellSouth has developed a proposed Audit Plan for use by the parties to an audit. If requested by a Public Service Commission or by a CLEC exercising contractual audit rights, BellSouth will agree to undergo an comprehensive audit of its Performance Metrics Quality Assurance Plan (PMQAP) including any necessary data the current year aggregate level reports for both BellSouth and the CLECs every other year for each of the next five (5) years (2004-2005 2005-2010) to be conducted by an independent third party auditor jointly selected by BellSouth and the CLEC. The results of audits will be made available to all the parties subject to proper safeguards to protect proprietary information. Requested This aggregate level audits includes the following specifications:~~

- ~~1. The cost shall be borne 50% by BellSouth and 50% by the CLEC or CLECs expressing their contractual rights. If no party is sharing the costs of this audit, BellSouth may utilize its internal auditing organization to conduct the audit.~~
- ~~2. Should an The independent third party auditor shall be selected required, with input from it shall be selected by BellSouth, with input from the PSC, if applicable, and the CLEC(s) other parties bearing the cost of the audit.~~
- ~~3. BellSouth, the PSC and the CLECs shall jointly determine the scope of the audit. Due to the regional nature of the process compilation, generation, and reporting of performance metric data, BellSouth shall be required to perform no more than one audit of those regional processes and measures within its region per year.~~

~~These comprehensive audits are intended to provide the basis for the PSCs and CLECs to determine that the SQM and PMAP and SBEM produce accurate data that reflects each State's Order for performance measurements. Once this has been verified by an initial audit, the BellSouth PMQAP will provide the basis for future audits.~~

REQUEST: BellSouth to provide examples of "Informational Tickets".

RESPONSE: Information report types will be used to track maintenance activities necessary for administrative, historical, analytical or billing purposes. Examples of situations where this report type will be used include the following:

- When conditions on a line are being investigated not associated with an open trouble report.
- Administrative tasks specified in local procedures.
- When a CLEC requests stress testing.
- When a CLEC asks for BellSouth to schedule a technician to visit the end-user's premise to meet with a vendor.
- When a CLEC requests information.

RESPONSE PROVIDED BY: Al Varner

REQUEST: BellSouth is to clearly define the exclusion "troubles outside of BellSouth's control" which is listed in M&R-1 through M&R-4.

RESPONSE: BellSouth references the following codes when excluding "Troubles outside of BellSouth's Control":

Design services refer to the WFA Disposition and Analysis Code FAC/CC. Non-Design services refer to the LMOS Disposition and Cause Codes 412 & 413.

Design:

Code FAC/CC is defined as Customer / Contractor Caused Cut Cable. A Cut or Damaged Cable, caused by other than Bell Employees

Non Design:

Trouble Codes 0412 and 0413 (Outside Plant) are defined as Cable Damage - Non Telco Employee.

Troubles in BellSouth facilities caused by customer (codes C1-C7)

Troubles caused by vandalism (codes V1-V5)

RESPONSE PROVIDED BY: Al Varner

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to October 7, 2004
Workshop Action Items
October 19, 2004
Item No. 3
Page 1 of 1

REQUEST: BellSouth to show the proposed rollups of all disaggregations for all measures.

RESPONSE: The attached document, "Modified Disaggregation Rollups.doc" shows BellSouth's proposed rollups of disaggregations for all measures. This document only lists the disaggregations that would change.

RESPONSE PROVIDED BY: Al Varner

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to October 7, 2004
Workshop Action Items
October 19, 2004
Item No. 4
Page 1 of 1

REQUEST: BellSouth to define "referred time" in the Business Rules of M&R-3 (Maintenance Average Duration).

RESPONSE: Referral time is used when BellSouth isolates a trouble into independent company territory. For example, a CLEC reports a trouble to BellSouth where the circuit terminates in an independent company's territory. BellSouth clears the trouble from the CLEC point of interface through the BST network to where it is handed off to the independent company. BellSouth then opens a maintenance trouble ticket with the independent company and puts the original ticket into REF (referral), status. This time, while the independent company is clearing the trouble, is currently excluded from BellSouth's responsible duration, (the same way No Access and Delayed Maintenance are). The independent company continues to work the CLEC trouble until it is restored and then BellSouth closes the ticket with the code appropriate to whatever the cause of the trouble is.

RESPONSE PROVIDED BY: Al Varner

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to October 7, 2004
Workshop Action Items
October 19, 2004
Item No. 5
Page 1 of 1

REQUEST: BellSouth to revise language in Appendix B – BellSouth Audit Policy that is referring to PMQAP. Propose language that will state the audit is for both processes and the underlying data.

RESPONSE: Attached is the revised BellSouth Audit Policy as “FL Audit Policy.doc” which refers to the inclusion of PMQAP and the underlying data during the audit. This clarification is in the first paragraph of the Audit Policy.

RESPONSE PROVIDED BY: Al Varner

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to October 7, 2004
Workshop Action Items
October 19, 2004
Item No. 6
Page 1 of 1

REQUEST: BellSouth is to clarify the regional audit language. This is Item No. 3 in the Audit Policy (Appendix B of the SQM).

RESPONSE: BellSouth has clarified the regional audit language in the BellSouth Audit Policy which is described in Item No. 3. The revised Audit Policy is attached as "FL Audit Policy.doc".

RESPONSE PROVIDED BY: Al Varner

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to October 7, 2004
Workshop Action Items
October 19, 2004
Item No. 7
Page 1 of 1

REQUEST: BellSouth is to clarify language in the Reposting Policy (Appendix D of the SQM) that refers to BellSouth's policy on recalculating SEEM payments for a maximum of 3 months in arrears.

RESPONSE: BellSouth has added clarifying language in Appendix D – BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments which is attached as "FL Reposting Policy.doc".

RESPONSE PROVIDED BY: Al Varner

Appendix D: BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments

BellSouth will make available reposted performance data as reflected in the Service Quality Measurement (SQM) reports and recalculate Self-Effectuating Enforcement Mechanism (SEEM) payments using the Parity Analysis and Remedy Information System (PARIS), to the extent technically feasible, under the following circumstances:

1. Those measures included in a state's specific SQM plan with corresponding sub-metrics are subject to reposting. A notice will be placed on the PMAP website advising CLECs when reposted data is available.
2. Performance sub-metric calculations that result in a shift in the statewide aggregate performance from an "in parity" condition to an "out of parity" condition will be available for reposting.
3. Performance sub-metric calculations with benchmarks where statewide aggregate performance is in an "out of parity" condition will be available for reposting whenever there is a $\geq 2\%$ decline in BellSouth's performance at the sub-metric level.
4. Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a decline in performance as shown by an adverse change of $\leq .5$ in the z-score at the sub-metric level.
5. Any data recalculations that reflect an improvement in BellSouth's performance will be reposted at BellSouth's discretion. However, statewide performance must improve by at least 2% for benchmark measures and the z-score must improve by at least 0.5 for retail analogs at the sub-metric level to qualify for reposting.
6. Performance data will be reposted for a maximum of three months in arrears. As an example, should an error be discovered in July during the analysis of the May data month, and this error triggers a reposting, BellSouth will not correct any data prior to the February data month to reflect retroactive correction of this error.
7. When updated performance data has been reposted or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments where technically feasible, for a maximum of three months in arrears. Recalculated SEEM payments due to reposted data will be made for the same months that the applicable data was reposted. The three month period for recalculating SEEM payments due to an error in PARIS will be determined in the same manner previously described for the SQM. For example, should an error in PARIS be discovered in July, May will be the current data month. BellSouth will not correct any data prior to the February data month to reflect retroactive correction of this error.
8. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies resulting from the application of this policy will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 and Tier 2 remedies will be made at BellSouth's discretion.
9. Any adjustments for underpayments resulting from application of this policy will be made in the next month's payment cycle after the recalculation is made. The final current month PARIS reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.

Florida Proposed SQM Disaggregation Rollups

Functional Area	Measure	Current SQM Disaggregation(s)	Proposed SQM Rollup Disaggregation	Notes
Ordering	0-2 (AKC)	<ul style="list-style-type: none"> • EDI • TAG 	<ul style="list-style-type: none"> • Acknowledgements 	
	0-3 (PFT)	<ul style="list-style-type: none"> • Residence • Business • UNE – P • UNE Loops 	<ul style="list-style-type: none"> • Resale • UNE 	
	0-8 (RI) / 0-9 (FOCT) / 0-11 (FOCRC)	<ul style="list-style-type: none"> • Resale Residence • Resale Business • Resale Design (Special) • Resale PBX • Resale Centrex • Resale ISDN • LNP (Standalone) • INP (Standalone) • 2W Analog Loop Design • 2W Analog Loop Non – Design • 2W Analog Loop with INP – Design • 2W Analog Loop with INP – Non – Design • 2W Analog Loop with LNP – Design • 2W Analog Loop with LNP – Non – Design • UNE Digital Loop <DS1 • UNE Digital Loop >=DS1 • UNE Loop + Port Combinations • UNE Combination Other • UNE ISDN Loop • UNE Other Design • UNE Other Non – Design 	<ul style="list-style-type: none"> • All products will be classified as Fully Mechanized, Partial Mechanized, or Non – Mechanized based on the manner in which the order is processed 	

Florida Proposed SQM Disaggregation Rollups

Functional Area	Measure	Current SQM Disaggregation(s)	Proposed SQM Rollup	Notes
Provisioning	P-3 (PIAM) / P-9 (PPT)	<ul style="list-style-type: none"> • Resale ISDN • Resale PBX – Design • Resale Centrex – Design 	<ul style="list-style-type: none"> • Resale Design 	
		<ul style="list-style-type: none"> • Resale PBX – Non – Design • Resale Centrex – Non –Design 	<ul style="list-style-type: none"> • Resale Business 	
		<ul style="list-style-type: none"> • LNP (Standalone) • INP (Standalone) 	<ul style="list-style-type: none"> • INP/LNP (Standalone) 	
		<ul style="list-style-type: none"> • 2W Analog Loop with LNP – Design • 2W Analog Loop with INP – Design 	<ul style="list-style-type: none"> • UNE Analog Loop (Design) 	
		<ul style="list-style-type: none"> • 2W Analog Loop with LNP – Non – 	<ul style="list-style-type: none"> • UNE Analog Loop (Non – Design) 	
			<ul style="list-style-type: none"> • UNE Loop + Port Combinations 	
		<ul style="list-style-type: none"> ○ With Conditioning 		
		<ul style="list-style-type: none"> • UNE Line Splitting <ul style="list-style-type: none"> ○ Without Conditioning ○ With Conditioning 	<ul style="list-style-type: none"> • UNE Line Splitting 	
		<ul style="list-style-type: none"> • Local Transport (Unbundled Interoffice Transport) • UNE Switch Ports 	<ul style="list-style-type: none"> • UNE Other Design • UNE Other Non- Design 	These disaggregations roll into the proposed disaggregations based on the characteristics of the

Florida Proposed SQM Disaggregation Rollups

Functional Area	Measure	Current SQM Disaggregation(s)	Proposed SQM Rollup Disaggregation	Notes
				line ordered by the customer.
		<ul style="list-style-type: none"> • UNE Combo Other 	<ul style="list-style-type: none"> • UNE EELs • UNE Other Design • UNE Other Non-Design 	This disaggregation rolls into the proposed disaggregations based on the characteristics of the line ordered by the customer.
		<ul style="list-style-type: none"> • UNE UDC/IDSL 	<ul style="list-style-type: none"> • UNE ISDN 	
	P-7 (CCCI) / P-7B (RT)	<ul style="list-style-type: none"> • Unbundled Loops with INP • Unbundled Loops with LNP 	<ul style="list-style-type: none"> • Coordinated Customer Conversions (Loops) 	
	P-7A (HCT)	<ul style="list-style-type: none"> • SL1Time Specific • SL1 Non –Time Specific • SL2Time Specific • SL2 Non –Time Specific 	<ul style="list-style-type: none"> • Non – IDLC 	
		<ul style="list-style-type: none"> • SL1 IDLC • SL2 IDLC 	<ul style="list-style-type: none"> • IDLC 	
	P-7C (PT)	<ul style="list-style-type: none"> • UNE Loops Design • UNE Loops Non – Design 	<ul style="list-style-type: none"> • UNE Loops 	
	P-13D (DTNT)	<ul style="list-style-type: none"> • LNP (Normal Working Hours and Approved After Hours) • LNP (Unscheduled After Hours Ports) 	<ul style="list-style-type: none"> • LNP 	
M&R	M&R-1 (PRAM) / M&R-2 (CTRR) / M&R-3 (MAD)	<ul style="list-style-type: none"> • Resale ISDN • Resale PBX – Design • Resale Centrex – Design 	<ul style="list-style-type: none"> • Resale Design 	

Florida Proposed SQM Disaggregation Rollups

Functional Area	Measure	Current SQM Disaggregation(s)	Proposed SQM Rollup Disaggregation	Notes
		<ul style="list-style-type: none"> • Resale Centrex – Non -Design • UNE Combo Other 	<ul style="list-style-type: none"> • UNE EELs • UNE Other Design • UNE Other Non-Design 	<p>This disaggregation rolls into the proposed disaggregations based on the characteristics of the line ordered by the customer.</p>
		<ul style="list-style-type: none"> • Local Transport (Unbundled Interoffice Transport) • UNE Switch Ports 	<ul style="list-style-type: none"> • UNE Other Design • UNE Other Non- Design 	<p>These disaggregations roll into the proposed disaggregations based on the characteristics of the line ordered by the customer.</p>