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October 25, 2004

BY ELECTRONIC FILING

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:

Attached please find the CLEC Coalition's Reply to Action Items from the October 7, 2004, Informal Call regarding BellSouth's SQM Six-Month Review in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/las
Attachment
cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the CLEC's Reply was served by

U.S. Mail this 25th day of October 2004 to the following:

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s/ Tracy W. Hatch

Tracy W. Hatch

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment of Operations Support System Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth Track))
Docket No. 000121A-TP
Filed: October 25 2004

CLEC COALITION REPLY TO ACTION ITEMS

Competitive Local Exchange Carriers (“CLECs”), AT&T Communications of the Southern States, LLC; Birch Telecom; DIECA Communications Company d/b/a Covad Communications Company (“Covad”); ITC^DeltaCom Communications, Inc. (“ITC^DeltaCom/BTI”); MCI metro Access Transmission Services, LLC, MCI WorldCom Communications, Inc.; and Network Telephone Corp., hereinafter collectively referred to as the “CLEC Coalition,” hereby file the following responses to the Florida Public Service Commission Staff’s (“Staff’s”) request that answers be supplied for the following Action Items from the October 7, 2004 SQM Six-Month Review conference call:

Action Item – For MR-1 (Missed Repair Appointment), provide language in the Business Rules to displace the "No Access" verbiage.

Response: The following language addresses how "No Access" trouble reports are handled for this measurement:

If "No Access" occurs after the commitment time, the report is flagged as a "missed commitment." If "No Access" occurs before the commitment time, the report is considered a "made commitment."

Action Item - Provide comments on why the Reposting Policy is not acceptable.

Response: See Attachment “1”.

Action Item – Provide specific language for a plan to improve wholesale performance when wholesale performance is at parity with retail, but the retail level of performance inhibits the CLECs’ ability to compete for local service.

Response: See Attachment “2”.

Action Item – Provide comments on CLECs’ Objections to BellSouth’s Proposed Description of Raw Data and Other Supporting Data Files in Appendix E.

Response: See Attachment “3”.

Respectfully submitted this 25th day of October, 2004.

CLEC COALITION

s/ Tracy Hatch

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ATTACHMENT "1"

BellSouth's Data Reposting Policy is inappropriate because it does not adequately trigger reposting of SEEM reports and recalculating of remedies.

BellSouth's reposting policy severely and inappropriately limits conditions under which identification of data errors will lead to recalculation and reposting of SEEM results.

Item 2 of BellSouth's policy states that "Performance sub-metric calculations that result in a shift in performance in the aggregate from an "in parity" condition to an "out of parity" condition will be available for reposting." Further in Item 7 it states "when updated performance data has been made available for reposting or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments." Thus it appears that for sub-metrics that were found to be in parity on the original SQM report, BellSouth recalculates SEEM only when the SQM report for that submetric is changed to an out of parity condition.

However, a change from in parity to out of parity on the SQM report is a very poor proxy for whether the SEEM calculations would have changed to a meaningful extent. The SQM reports and SEEM evaluate compliance differently and use very different statistical methodologies.

1. The SQM reports aggregate data across CLECs. For both benchmarks and parity metrics, a lack of change in the status for an aggregate SQM comparison may conceal a very large change for an individual CLEC. For example, consider a 95% benchmark metric for which CLEC A has 100 transactions and the other CLECs combined have 900 transactions. Assume that in the original posting, the reported success rate was 100%

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for CLEC A and 96% for the other CLECs combined—for an overall rate of 96.4%. Furthermore, assume that after the original posting, BellSouth discovers that the correct success rate for CLEC A was 90%. Because the corrected overall rate of 95.4% would still be above the benchmark, BellSouth would not repost SEEM results for CLEC A, even though its results would then fall well below the benchmark..

2. Even for Tier II calculations, the methodology used for parity comparisons in SEEM differs substantially from that used in the SQM reports. Unlike for the SQM reports, in SEEM, data are disaggregated into cells to create like-to-like comparisons, and then reaggregated using the truncated Z statistic. Within the SQM reporting, transactions are disaggregated directly at the submeasure level and a modified Z score is determined at the submeasure level. Consequently, z scores may differ greatly between the SQM report and the corresponding SEEM comparison.
3. The MSS reports use a fixed critical value of -1.645 while SEEM uses a balancing critical value, which varies with sample size and may be greater or less than -1.645.

Consequently, it would be very easy for the SEEM comparison to change from in parity to out of parity (or from a little to a lot out of parity) while the SQM comparison remained in parity. For example, assume that the z-score for parity metric in the original SQM report is -0.5, and that subsequent changes lead to a corrected value of -1.5. It is likely that SEEM's truncated z-score would also change by about -1.0 (although the change could be much more or less). If that change was also from -0.5 to -1.5, and the

ATTACHMENT "1"

balancing critical value fell in the interval -0.5 to -1.5, then the SEEM determination would change from in parity to out of parity. Even if SEEM's balancing critical values was -2.5, the SEEM determination would change if, for example, the truncated z-score changed from -2.0 to -3.0. However, because both the original and corrected SQM z-scores exceed the fixed critical value or -1.645 used in the SQM reports, BellSouth would not repost any SEEM results for that metric.

ATTACHMENT “2”

BellSouth’s Wholesale Quality Improvement Plan

BellSouth will work with CLECs to improve performance where parity or benchmark performance does not meet the retail performance levels desired by customers or required by the state end user service quality rules. The fact that BellSouth is not paying remedies for its wholesale performance under the SEEM plan does not absolve it from working with CLECs to meet customer or state performance needs. A CLEC may request a root cause analysis and improvement plan if:

- o BellSouth misses a parity or benchmark standard for three consecutive months.
- o If parity exists but performance is below a 95% standard or more than 5% worse than published standard interval performance for relevant product or system for two consecutive months.

BellSouth must respond with the root cause analysis within 30 days of the CLEC request and provide an improvement plan within 45 days of the CLEC’s request. The agreed improvement plan would be implemented in 60 days of the CLECs request and improved performance would be expected over the next two full months following implementation.

If the CLEC responds that the analysis and/or improvement plan are inadequate or the results from plan’s implementation are inadequate, the CLEC may escalate concerns to account representative’s management. If management does not respond in 5 business days or CLEC deems response to be inadequate, the CLEC may ask the Public Service Commission to resolve the issue, including actions in retail or wholesale performance dockets to improve performance. These may include adopting a wholesale metric benchmark change, a move to parity with a floor regime for wholesale metrics, a move from parity to a straight benchmark for the wholesale product, or incentives to improve retail performance to raise the parity bar.

ATTACHMENT “3”

Action Item – Provide comments on CLECs’ Objections to BellSouth’s Proposed Description of Raw Data and Other Supporting Data Files in Appendix E.

The CLECs’ objections stem not from the addition of Appendix E to the SQM plan, but from the exclusion of certain data files that BellSouth currently provides to CLECs. At first blush Appendix E appears to be a helpful addition, however in reality it serves to limit BellSouth’s obligations to provide the raw (supporting) data (SDF) files and other supporting data files (OSDF) that CLECs have been accustomed to getting under the existing SQM.

For example, Paragraph I (A) of Appendix E states that “This supporting data represents all records that are used to calculate CLEC performance under the SQM sub-metrics.” However if you look further down in Paragraph II (A-D), the list of SDF files BellSouth intends to provide does not agree with the previous statement.

BellSouth currently provides CLECs with fifty-five (55) SDF and five (5) OSDF files, which are listed below by domain. CLECs are able to request and download these SDF and OSDF files online via BellSouth’s PMAP website.

SUPPORTING DATA FILES:

Pre-Ordering:

- Loop Make Up Response Time – Electronic
- Loop Make Up Response Time – Manual
- OSS Interface Availability

Ordering:

- % Rejected Service Requests
- Acknowledgment Message Completeness
- Acknowledgment Message Timeliness
- FOC Timeliness
- FOC and Reject Response Completion
- LNP - % Rejected Service Requests
- LNP – FOC Timeliness
- LNP – Reject Interval
- Reject Interval
- Service Inquiry with LSR Firm Order Completion

Provisioning:

- % Completions w/o Notice or < 24 Hours Notice
- % Cooperative Testing Attempts for xDSL
- % Jeopardy
- % Missed Installation Appointments
- % Troubles within 30 Days of Provisioning
- Average Completion Notice Interval
- CCC – Average Recovery Time
- CCC – Hot Cuts Timeliness

ATTACHMENT “3”

- Customer Coordinated Conversions
- Firm Order Completion Interval
- Held Order Interval
- Hot Cuts - % Troubles within 7 Days of Service Order Completion
- Jeopardy Interval
- LNP – Percent Out of Service < 60 Min (SMS)
- LNP – Non Trigger
- LNP – Total Service Order Cycle Time
- LNP – Trigger
- Order Completion Interval
- Service Order Accuracy
- Total Service Order Cycle Time

Maintenance & Repair:

- % Repeat Troubles within 30 Days
- Customer Trouble Report Rate
- Lines in Service
- M&R Interface Availability
- Maintenance Average Duration
- Missed Repair Appointments
- Out of Service > 24 Hours

Billing:

- % Billing Errors Corrected in “X” Business Days
- % Daily Usage Feed Errors Corrected in “X” Business Days
- Invoice Accuracy
- Mean Time to Deliver Usage
- Mean Time to Deliver Invoices
- Non-Recurring Charge Completeness
- Recurring Charge Completeness
- Usage Data Completeness
- Usage Data Delivery Accuracy
- Usage Data Timeliness

Database Update Information:

- % NXX LRNs Loaded by LERG Effective Date
- Average Database Update Interval

Collocation:

- Average Arrangement Time
- Average Response Time
- Percent Missed Due Dates

ATTACHMENT “3”

OTHER SUPPORTING DATA FILES:

- Loop Make Up Response Time – Electronic
- Loop Make Up Response Time – Manual
- Maintenance & Repair
- Ordering
- Provisioning

In contrast to the data files that are currently provided under the existing SQM, Appendix E of BellSouth’s proposed SQM suggests that they will publish only eighteen (18) SDF files on the PMAP website each month. Further, BellSouth states that they will continue to provide OSDF files to each CLEC but only if that CLEC requests them each month. Since they are currently published and available to request along with the SDF files, the CLECs will be required to request the OSDF files separate and apart from the SDF files each month. Finally, BellSouth does not indicate what OSDF files will be provided.

Granted, some of the SDF files were omitted because BellSouth proposes to delete them from the SQM plan entirely. However, this is not true for all of the omitted SDF files. As an example, BellSouth currently provides three (3) SDF files for the Collocation domain. BellSouth did not propose to delete any of the Collocation metrics, however Appendix E of the proposed SQM indicates that BellSouth will not provide any SDF files related to the Collocation metrics. Yet, in accordance with the statement in Paragraph I (A) of the Appendix, these files would contain CLEC-initiated records that were used to replicate the SQM report(s) and should be provided to CLECs.

The CLECs request that at a minimum, BellSouth continue to provide the SDF and OSDF files which are currently available on the PMAP website and shown above.