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January 5, 2005

**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 December 9, 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/scd  
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 electronic and U.S. Mail this 5th day of January 2005 to the following:

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*s/ Tracy W. Hatch*  

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*Tracy W. Hatch*

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: January 5, 2005  
Companies (BellSouth Track) )  
\_\_\_\_\_ )

**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”); MCImetro 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 Item from the December 9, 2004 SQM Six-Month Review conference call:

Action Item 1

Measure CM-11 currently measures the % of change requests that are implemented in 60 weeks. CLECs requested a change to this measure so that if a change request was "process or documentation" only and not associated with a software release, that the interval be 60 days. CLECs are to provide information regarding discussion, if any, of this request in the Change Control Process (CCP) meetings.

Response:

The CLECs did not raise this performance standards issue in the CCP forum, nor do they believe it is necessary to do so. The CLECs note that the 60 week interval currently in place for CM-11 was established by the Florida Commission, not by the CCP. The CLECs further note that BellSouth also does not attempt to modify performance standards through operational channels. For example, BellSouth did not raise the change of performance standard from 5 hours to diagnostic for measure P7B with a CLEC User Group. It instead proposed a change through this performance measures review just as the CLECs did for CM-11. Other examples of items not raised in User Groups but included in the BellSouth proposed changes are; the change from 4

hours to 12 hours for measure P-13D, and the interval for FOCs and rejections for interconnection trunks described in Action Item 2 below.

Action Item 2

In Florida, the performance standard for Interconnection Trunks is currently 36 hours for rejections, and 48 hours for FOCs. BellSouth is proposing 4 days and 10 days (respectively). CLECs are to provide input regarding changes to these standards.

Response:

For rejections, CLECs could support changing the standard from 36 hours to 48 hours. For FOCs, CLECs believe that trunks should be similar to special access. Therefore, CLECs propose 2 business days for DS1s and 5 business days for DS3s. (see performance measure SA-1)

Action Item 3

CLECs to propose a retail analog for Maintenance Metric disaggregations for UNE Other Design and Non-Design. CLECs oppose this measure being diagnostic.

Response:

The CLECs propose the following analogs for M&R measures:

UNE Other Design	NID, subloops and muxes for retail DS1 and higher
UNE Other Non-Design	NID, sub-loop for retail less than DS1

These appear to be the most similar products to those included in the UNE Other Design groupings for Design and Non-Design facilities.

Additionally, CLECs are also confused on why there is significantly more volume in the ordering (FOC/Reject) reports when compared to provisioning and M&R measures. For example, see the volumes below taken from the October 2004 FL MSS report.

Product	Measure	CLEC Volume (Denominator)
Other Design	FOC /Reject Completeness & % Rejected Svc. Requests	1
Other Non-Design	FOC /Reject Completeness & % Rejected Svc. Requests	22,393

Other Design	% Missed Appts.	0
Other Non-Design	% Missed Appts	0
Other Design	Customer Trouble Report Rate	22
Other Non-Design	Customer Trouble Report Rate	2200

Could BellSouth please explain this difference

Respectfully submitted this 5<sup>th</sup> day of January, 2005.

**CLEC COALITION**

s/ Tracy Hatch

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