

Robert A. Culpepper
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January 28, 2005

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 Call on January 21, 2005, and Responses to Action Items raised during the Flow-Through Workshop on January 24, 2005, 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,

Handwritten signature of Robert A. Culpepper in black ink, followed by a slash and the initials 'DS'.

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and U.S. Mail this 28th day of January, 2005 to the following:

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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

REQUEST: BellSouth to provide product roll-up information for UNE Other Design, UNE Other Non-Design as well as the products in the Retail Analog for these categories.

RESPONSE: BellSouth has attached product roll-up information for UNE Other Design, UNE Other Non-Design as well as the products in the Retail Analog for these categories in the document "FL UNE Other Design and Non-Design.doc".

FLORIDA UNE OTHER DESIGN and NON-DESIGN PRODUCTS and RETAIL ANALOGS

UNE OTHER DESIGN

UNE 4W Analog Loop (Ground or Loop Start) w/o NP
UNE DS1 Non-Channelized Local Channel
UNE DS3 Non-Channelized Local Channel
UNE STS-1 Non-Channelized Local Channel
UNE DS1 Channelized Local Channel
UNE DS3 Channelized Local Channel
UNE STS-1 Channelized Local Channel
UNE DS1 Channelization (1/0 Mux)
UNE DS3 Channelization (3/1 Mux)
UNE STS-1 Channelization (3/1 Mux)
UNE Dedicated Transport - Dark Fiber Local Loop
UNE Dedicated Transport - Dark Fiber Local Channel
UNE Dedicated Transport - Dark Fiber Interoffice Channel
UNE Sub-Loop Feeder - 2W Voice Loop (Ground Start)
UNE Sub-Loop Feeder - 2W Voice Loop (Loop Start)
UNE Sub-Loop Feeder - 2W Voice Loop (Reverse Battery)
UNE Sub-Loop Feeder - 4W Voice Loop (Ground Start)
UNE Sub-Loop Feeder - 4W Voice Loop (Loop Start)
UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 2.4kbps
UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 4.8kbps
UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 9.6kbps
UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 19.2kbps
UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 56kbps
UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 64kbps
UNE Sub-Loop Feeder - 2W ISDN Loop (Basic Rate)
UNE Sub-Loop Feeder - DS1 Local Loop
UNE Sub-Loop Feeder - 2W Unbundled Copper Loop w/o Loop Modification
UNE Sub-Loop Feeder - 2W Unbundled Copper Loop (UCL) w Load Coil Removal - Loop Modification
UNE Sub-Loop Feeder - 2W Unbundled Copper Loop (UCL) w Bridge Tap Removal - Loop Modification
UNE Sub-Loop Feeder - 2W Unbundled Copper Loop (UCL) w Load Coil & Bridge Tap Removal - Loop Modification
UNE Sub-Loop Feeder - 4W Unbundled Copper Loop w/o Loop Modification
UNE Sub-Loop Feeder - 4W Unbundled Copper Loop (UCL) w Load Coil Removal - Loop Modification
UNE Sub-Loop Feeder - 4W Unbundled Copper Loop (UCL) w Bridge Tap Removal - Loop Modification
UNE Sub-Loop Feeder - 4W Unbundled Copper Loop (UCL) w Load Coil & Bridge Tap Removal - Loop Modification
UNE Loop Concentration - TR008 System A
UNE Loop Concentration - TR008 System B
UNE Loop Concentration - TR303 System A
UNE Loop Concentration - TR303 System B

UNE 2W Voice Loop (Ground or Loop Start) Riding ULC System
UNE 2W Voice Loop (Reverse Battery) Riding ULC System
UNE 4W Voice Loop (Ground or Loop Start) Riding ULC System
UNE 4W Unbundled Digital Loop - 2.4kbps Riding ULC System
UNE 4W Unbundled Digital Loop - 4.8kbps Riding ULC System
UNE 4W Unbundled Digital Loop - 9.6kbps Riding ULC System
UNE 4W Unbundled Digital Loop - 19.2kbps Riding ULC System
UNE 4W Unbundled Digital Loop - 56kbps Riding ULC System
UNE 4W Unbundled Digital Loop - 64kbps Riding ULC System
UNE 2W ISDN (Basic Rate) Loop Riding ULC System
UNE 2W UDC (Universal Digital Channel) Capable Loop Riding ULC System
UNE Remote Site Unbundled DSL (RSUDSL) ATM DS1 Interface - 1.536 Mbps
UNE Remote Site Unbundled DSL (RSUDSL) ATM DS3 Interface - 44.210 Mbps
UNE Sub-Loop Feeder - DS3 Loop
UNE Sub-Loop Feeder - STS-1 Loop
UNE Sub-Loop Feeder - OC-3 2 Fiber Loop
UNE Sub-Loop Feeder - OC-3 4 Fiber Loop
UNE Sub-Loop Feeder - OC-12 2 Fiber Loop
UNE Sub-Loop Feeder - OC-12 4 Fiber Loop
UNE Sub-Loop Feeder - OC-48 2 Fiber Loop
UNE Sub-Loop Feeder - OC-48 4 Fiber Loop
UNE 4W Analog Loop (Ground or Loop Start) w INP
UNE 4W Analog Loop (Ground or Loop Start) w LNP
Unbundled Ports (Switching) - 4W Digital ISDN PRI Port

UNE OTHER DESIGN - RETAIL ANALOG = Retail Design

PBX Design
CENTREX/ESSX Design
Design
ISDN Basic Rate Residence Design
ISDN Basic Rate Business Design
ISDN Primary Rate Residence Design
ISDN Primary Rate Business Design
ISDN Primary Rate Megalink (1.544 MBPS) Residence Design
ISDN Primary Rate Megalink (1.544 MBPS) Business Design
Digital Loop < DS1 Services
Digital Loop >= DS1 Services

UNE OTHER NON-DESIGN

UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w/o Loop Modification w/o NP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil Removal - Loop Modification w/o NP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Bridge Tap Removal - Loop Modification w/o NP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil & Bridge Tap Removal - Loop Modification w/o NP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w/o Loop Modification w/o NP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil Removal - Loop Modification w/o NP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Bridge Tap Removal - Loop Modification w/o NP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil & Bridge Tap Removal - Loop Modification w/o NP
UNE Network Terminating Wire (NTW)
UNE Network Interface Devices (NID) - 1 to 2 Lines - NID 1 Residence
UNE Network Interface Devices (NID) - 1 to 2 Lines - NID 1 Business
UNE Network Interface Devices (NID) - 1 to 2 Lines, NID to NID Cross Connect 2W - NID 2 Residence
UNE Network Interface Devices (NID) - 1 to 2 Lines, NID to NID Cross Connect 2W - NID 2 Business
UNE Network Interface Devices (NID) - 1 to 2 Lines, NID to NID Cross Connect 4W - NID 3 Residence
UNE Network Interface Devices (NID) - 1 to 2 Lines, NID to NID Cross Connect 4W - NID 3 Business
UNE Network Interface Devices (NID) - 1 to 6 Lines - NID 4 Residence
UNE Network Interface Devices (NID) - 1 to 6 Lines - NID 4 Business
UNE Network Interface Devices (NID) - 1 to 6 Lines, NID to NID Cross Connect 2W - NID 5 Residence
UNE Network Interface Devices (NID) - 1 to 6 Lines, NID to NID Cross Connect 2W - NID 5 Business
UNE Network Interface Devices (NID) - 1 to 6 Lines, NID to NID Cross Connect 4W - NID 6 Residence
UNE Network Interface Devices (NID) - 1 to 6 Lines, NID to NID Cross Connect 4W - NID 6 Business
UNE Sub-Loop Distribution - 2W Voice Grade Sub-Loop w NID w/o NP
UNE Sub-Loop Distribution - 4W Voice Grade Sub-Loop w NID w/o NP
UNE Sub-Loop Intra-building Network Cable - 2W Voice Grade Sub-Loop w NID w/o NP
UNE Sub-Loop Intra-building Network Cable - 4W Voice Grade Sub-Loop w NID w/o NP
UNE Copper Sub-Loop - 2W w/o Loop Modification w/o NP
UNE Copper Sub-Loop - 2W w Load Coil Removal - Loop Modification w/o NP
UNE Copper Sub-Loop - 2W w Bridge Tap Removal - Loop Modification w/o NP
UNE Copper Sub-Loop - 2W w Load Coil & Bridge Tap Removal - Loop Modification w/o NP
UNE Copper Sub-Loop - 4W w/o Loop Modification w/o NP

UNE Copper Sub-Loop - 4W w Load Coil Removal - Loop Modification w/o NP
UNE Copper Sub-Loop - 4W w Bridge Tap Removal - Loop Modification w/o NP
UNE Copper Sub-Loop - 4W w Load Coil & Bridge Tap Removal - Loop Modification w/o NP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w/o Loop Modification w INP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil Removal - Loop Modification w INP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Bridge Tap Removal - Loop Modification w INP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil & Bridge Tap Removal - Loop Modification w INP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w/o Loop Modification w INP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil Removal - Loop Modification w INP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Bridge Tap Removal - Loop Modification w INP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil & Bridge Tap Removal - Loop Modification w INP
UNE Sub-Loop Distribution - 2W Voice Grade Sub-Loop w NID w INP
UNE Sub-Loop Distribution - 4W Voice Grade Sub-Loop w NID w INP
UNE Sub-Loop Intrabuilding Network Cable - 2W Voice Grade Sub-Loop w NID w INP
UNE Sub-Loop Intrabuilding Network Cable - 4W Voice Grade Sub-Loop w NID w INP
UNE Copper Sub-Loop - 2W w/o Loop Modification w INP
UNE Copper Sub-Loop - 2W w Load Coil Removal - Loop Modification w INP
UNE Copper Sub-Loop - 2W w Bridge Tap Removal - Loop Modification w INP
UNE Copper Sub-Loop - 2W w Load Coil & Bridge Tap Removal - Loop Modification w INP
UNE Copper Sub-Loop - 4W w/o Loop Modification w INP
UNE Copper Sub-Loop - 4W w Load Coil Removal - Loop Modification w INP
UNE Copper Sub-Loop - 4W w Bridge Tap Removal - Loop Modification w INP
UNE Copper Sub-Loop - 4W w Load Coil & Bridge Tap Removal - Loop Modification w INP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w/o Loop Modification w LNP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil Removal - Loop Modification w LNP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Bridge Tap Removal - Loop Modification w LNP
UNE 2W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil & Bridge Tap Removal - Loop Modification w LNP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w/o Loop Modification w LNP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil Removal - Loop Modification w LNP

UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Bridge Tap Removal - Loop Modification w LNP
UNE 4W Unbundled Copper Loop (UCL-ND) Non-Design w Load Coil & Bridge Tap Removal - Loop Modification w LNP
UNE Sub-Loop Distribution - 2W Voice Grade Sub-Loop w NID w LNP
UNE Sub-Loop Distribution - 4W Voice Grade Sub-Loop w NID w LNP
UNE Sub-Loop Intrauilding Network Cable - 2W Voice Grade Sub-Loop w NID w LNP
UNE Sub-Loop Intrauilding Network Cable - 4W Voice Grade Sub-Loop w NID w LNP
UNE Copper Sub-Loop - 2W w/o Loop Modification w LNP
UNE Copper Sub-Loop - 2W w Load Coil Removal - Loop Modification w LNP
UNE Copper Sub-Loop - 2W w Bridge Tap Removal - Loop Modification w LNP
UNE Copper Sub-Loop - 2W w Load Coil & Bridge Tap Removal - Loop Modification w LNP
UNE Copper Sub-Loop - 4W w/o Loop Modification w LNP
UNE Copper Sub-Loop - 4W w Load Coil Removal - Loop Modification w LNP
UNE Copper Sub-Loop - 4W w Bridge Tap Removal - Loop Modification w LNP
UNE Copper Sub-Loop - 4W w Load Coil & Bridge Tap Removal - Loop Modification w LNP

UNE OTHER NON-DESIGN - RETAIL ANALOG = Retail Residence and Business

Residence
Business
PBX Non-Design
CENTREX/ESSX Non-Design
ISDN Basic Rate Residence Non-Design
ISDN Basic Rate Business Non-Design
ISDN Primary Rate Residence Non-Design
ISDN Primary Rate Business Non-Design
ISDN Primary Rate Megalink (1.544 MBPS) Residence Non-Design
ISDN Primary Rate Megalink (1.544 MBPS) Business Non-Design

REQUEST: BellSouth to provide a proposed benchmark for UNE Loop Design.

RESPONSE: BellSouth continues to believe that a retail analog should apply, in order of preference, with the associated OCI.

In December, those analogs are:

	<u>Volume</u>	<u>OCI</u>
Retail Residence, Business, and Design (Dispatch)	28,556	4.84
Retail Design Dispatch	299	20.59
UNE Analog Loop Design Dispatch	227	21.12

By comparison, the current analog for December 2004 was 4.84 days. If Staff elects to use a benchmark it should be based on the most analogous product which is 21 days.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to 1/21/05 Workshop
Action Items
January 28, 2005
Item 3
Page 1 of 1

REQUEST: BellSouth to provide a revised Appendix B: BellSouth Audit Policy with changes per Staff feedback.

RESPONSE: BellSouth has attached a redline SQM page for Appendix B: BellSouth Audit Policy, in the document "App B BellSouth Audit Policy.doc" with the requested changes.

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 4Q01.~~

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

~~BellSouth currently provides many CLECs with certain audit rights as a part of their individual interconnection agreements. 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 SQM comprehensive audit. ~~of the current year aggregate level reports for both BellSouth and the CLECs for each of the next five (5) years (2001-2005) to be~~ The audit should 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 Audits will be conducted under~~ include the following specifications:~~

- ~~1. The cost shall be borne by BellSouth.~~
- ~~2. The independent third party auditor shall be selected with input from jointly by BellSouth, and the PSC, if applicable, and the CLEC(s)~~
- ~~3. BellSouth, and the PSC ~~and the CLECs~~ shall jointly determine the scope of the audit.~~

~~These comprehensive audits are intended to provide the basis for the PSCs and CLECs to determine that the SQM and PMAP ~~and SEEM~~ 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.~~~~

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to 1/21/05 Workshop
Action Items
January 28, 2005
Item 4
Page 1 of 1

REQUEST: BellSouth to provide a revised Appendix D: BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments with changes per Staff feedback.

RESPONSE: BellSouth has attached revised SQM pages for Appendix D: BellSouth's Policy on Reposting of Performance Data and Recalculation of SEEM Payments, in the document "App D Reposting Policy.doc".

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 SQM 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. SQM 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. SQM 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. SQM Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a degradation 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. SQM Performance data will be reposted for a maximum of three months in arrears from the date of detection. As an example, should an error be discovered during the analysis of the May data month, and this error triggers a reposting, BellSouth will correct the data beginning with the month of detection (May) and the three months preceding – April, March and February.
7. When updated SQM 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 from the date of detection. Recalculated SEEM payments due to reposted SQM 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 for the data month of May, BellSouth will correct data for May and the three preceding months – April, March and February.
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.

When a CLEC believes that an error in its specific data requires reposting where the above statewide thresholds have not been met, the CLEC is responsible for identifying such issues and requesting BellSouth to repost the data.

Determination of when Reposting Policy Applies

As part of the Change Notification Process, BellSouth performs an analysis of impacts that are proposed to be made to Performance Measurement Application Platform (PMAP) code. These impacts are used to identify changes to its reported SQM results.

To determine this impact, BellSouth performs a query of the data warehouse to identify those records that would be impacted by the proposed change. Once the number of records are identified, the measurement is recalculated to determine the impact. This is the general framework for analysis - the specific steps used to evaluate the impact will vary with the issue being analyzed. However the following example may assist in understanding.



Florida Proposed Performance Metrics

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

Assume that service orders with an activity code of T were erroneously being included in a UNE-P disaggregation for Percent Missed Installation Appointments. They should have been in another product disaggregation. Further assume that the number of records erroneously included as UNEP is 110 records out of a total of 86,000. In this example, the numerator and denominator would both be reduced by 110 records and the zscore would be recalculated. If the amount of the change was sufficient to meet criteria 2, 4 or 5 above, the Reposting policy will be invoked.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to 1/21/05 Workshop
Action Items
January 28, 2005
Item 5
Page 1 of 1

REQUEST: BellSouth to provide a revised Appendix E: Description of Raw Data and other Supporting Data Files to reflect measures which the Commission Staff is recommending for retention.

RESPONSE: BellSouth has attached revised SQM pages for Appendix E: Description of Raw Data and other Supporting Data Files, BellSouth Service Quality Measurement Plan (SQMP) Raw (Supporting Data Files (SDF) Other Supporting Data Files (OSDF) in the document "App E SDF.doc".

Appendix E: Description of Raw Data and Other Supporting Data Files

BellSouth Service Quality Measurement Plan (SQMP) Raw (Supporting) Data Files (SDF) Other Supporting Data Files (OSDF)

I. Definitions and Overview

A. What is Raw Data?

Raw (Supporting) Data is supporting data or records captured in BellSouth Legacy Systems about activity initiated by CLECs or CLEC customers. Raw (Supporting) Data has been transformed from legacy system data to information (data with meaning). In some cases this supporting data is a combination of requests and response records, orders and troubles or other combination that provide logical transaction information. This supporting data has been normalized (converted from arcane system code to a more readable format) for easier use or, in some cases, the presentation is standardized so that the same data from different systems will be the same. In some cases, intervals have been previously calculated and, in other cases, the interval start and stop times are available. State, company, product, and other codes have been converted into English names. In short, the presentation of the information has been made more “user friendly” to facilitate use by SMEs, auditors and CLECs.

This supporting data represents all records that are used to calculate CLEC performance under the SQM sub-metrics.

II. Raw (Supporting) Data – General

Raw (Supporting) Data Files (SDF)

Raw (Supporting) Data Files for CLEC data will be published on the PMAP website each month. For the measures calculated in PMAP, these files will contain the CLEC initiated records required to replicate the report or reports as applicable. These files will be present for those reports generated from data processed by PMAP. Some reports are calculated outside of PMAP and the results are simply uploaded for posting. These reports will have less detailed Supporting Data Files.

Other Supporting Data Files (OSDF)

Other Supporting Data Files will also be provided upon CLEC request each month. These files contain CLECs initiated data/records extracted from the legacy systems, but “excluded” from the measures in each segment of the SQMP reports (Ordering, Flow Through Detail, Provisioning and Maintenance). The OSDF will contain only records not included in one of the SDFs. The CLEC will be able to access the request form by clicking on the OSDF folder in their section of the PMAP Web Site. The requested data will be loaded into the file within 10 business hours. The OSDF will also include partial and/or incomplete records if the CLEC owner can be identified. The OSDF will be regional in scope (not state-specific) and will include records for all related Measurements. The OSDF will not include records that are in any SDF. These four files may be large and the CLEC will be responsible for having an appropriate computer and the software necessary to accept and make manipulation of the files possible.

A. Raw Data (SDF) Records – OSS

For OSS Metrics:

Supporting data is provided for the following metrics

- [OSSRI] OSS Response Interval (Pre-Ordering/Ordering/Maintenance & Repair)
- [IA] Interface Availability (Pre-Ordering/Ordering/Maintenance & Repair)
- [ERT] Loop Makeup – Response Time – Electronic

Florida Proposed Performance Metrics

B. Raw Data (SDF) Records - Ordering**For Ordering Metrics:**

Supporting data is provided for the following metrics:

- [AKC] Acknowledgement Message Completeness
- [RI] Reject Interval
- [FOCT] Firm Order Confirmation Timeliness
- [FOCRC] Firm Order Confirmation and Reject Response Completeness

As a general rule, all versions of transactions are provided in the Supporting Data Files. Records for Service Requests that are related to a project, cancelled prior to being FOC or Clarified/Rejected, and versions of records not used in the reports will be placed into the Other Supporting Data File – Ordering.

C. Raw Data (SDF) Records – Provisioning**For Provisioning Metrics:**

Supporting data is provided for the following metrics:

- [HOI] Held Order Interval
- [JNI] Percentage of Orders Given Jeopardy Notices \geq 48 Hours
- [JEP] Percentage of Orders Given Jeopardy Notices
- [PMIA] Percent Missed Installation Appointments
- [OCI] Order Completion Interval
- [CNI] Average Completion Notice Interval
- [CCCI] Coordinated Customers Conversions Interval – Hot Cut Duration
- [HCT] Coordinated Customers Conversions – Hot Cut Timeliness Percent within Interval
- [RT] Coordinated Customer Conversions – Average Recovery Time
- [PT] Hot Cut Conversions - Percent Provisioning Troubles Received within 5 Days of a Completed Service Order
- [CNDD] Non-Coordinated Customer Conversions – Percent Completed and Notified on Due Date
- [PPT] Percent Provisioning Troubles within “X” Days of Service Order Completion
- [SOAC] Service Order Accuracy
- [LOOS] LNP-Percent Out of Service < 60 Minutes
- [LAT] LNP-Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date
- [DTNT] LNP-Disconnect Timeliness (Non-Trigger)

All service order activity that results from Service Requests generated by the CLEC and used in the calculation of a report will be furnished as a part of the Supporting Data Files. Records for D, R, F, and M order types, as well as cancelled orders will be placed in the Other Supporting Data File – Provisioning.

D. Raw Data (SDF) Records – M&R**For Maintenance and Repair (M&R) Metrics:**

Supporting data is provided for the following metrics:

- [PMRA] Percent Missed Repair Appointments
- [CTRR] Customer Trouble Report Rate
- [MAD] Maintenance Average Duration
- [PRT] Percent Repeat Customer Troubles within 30 Days
- [OOS] Out of Service (OOS) > 24 Hours

All customer submitted reports used in the calculation of a metric will be furnished as a part of the Supporting Data Files. Reports that are excluded, canceled, or in error, will be placed in the Other Supporting Data File - M&R. Specifically not included are BellSouth generated tickets such as employee, auto-detect, and tickets associated with service order activity dispatches.

Florida Proposed Performance Metrics**E. Raw Data (SDF) Records – Other****For Other Metrics:****Billing:**

Supporting data is provided for the following metrics:

- [BIA] Invoice Accuracy
- [BIT] Mean Time to Deliver Invoices
- [UDDT] Usage Data Delivery Timeliness
- [PBEC] Percent Billing Adjustment Requests (BAR) Responded to Within 45 Business Days

The billing Supporting Data File used to create performance measurements for billing is provided for CLECs on the PMAP website. This SDF along with the reports resulting from billing supporting data can be used for replicating the measures. Any billing data used or not used in creating the billing measures is part of the CLEC's invoices sent to them on a monthly basis. Any charges or adjustments are part of their individual invoices, which identify the nature of the charges or adjustments, whether credits or debits.

Database Update Information - None**Trunk Group Performance – None****Collocation – None:**

Supporting data is provided for the following metrics:

- [ART] Collocation Average Response Time
- [AT] Collocation Average Arrangement Time
- [PMDD] Collocation Percent of Due Dates Missed

Change Management - None**III. Supporting Data User Manual (SDUM) and Schema for Other Supporting Data Files (OSDF)**

The SDUM and Schema can be found at URL (<http://pmap.bellsouth.com>) in the Documentation/Exhibits folder.

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to 1/21/05 Workshop
Action Items
January 28, 2005
Item 6
Page 1 of 1

REQUEST: BellSouth to provide a new Appendix F detailing the PMAP Notification process.

RESPONSE: BellSouth has attached a new SQM page for Appendix F: PMAP Notification Process, in the document "App F Data Notification Process.doc".

Appendix F: BellSouth PMAP Data Notification Process

1. On the first business day of the month preceding the data month for which BellSouth proposes to make any change to the method by which its performance data is calculated, BellSouth will provide written notice of any such proposed changes (hereinafter referred to as "Proposed Data Changes"). This notice will identify the affected measure(s), describe the proposed change, provide a reason for the proposed change, and outline its impact. At the same time BellSouth will provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following data month (hereinafter referred to as "Preliminary Data Changes").
2. No later than four business days after the written notice referenced above has been provided, BellSouth will conduct an industry conference call at which time the affected parties as well as the Commission can ask questions about either the Proposed Data Changes or the Preliminary Data Changes. The call will be conducted from 2:00 to 5:00 p.m. (Eastern Time).
3. No later than (10) business days after the industry conference call, affected parties must file written comments with the Commission to the extent they have objections or concerns about the Proposed Data Changes.
4. The Proposed Data Changes set forth in the written notice referenced above would be presumptively valid and deemed approved by the Commission effective thirty (30) calendar days after that notice.

REQUEST: BellSouth to provide top 10 Flow-Through Errors for UNE Loops.

RESPONSE: The table below lists the top 10 Flow-Through errors for UNE Loops.

ERROR NUM	ERROR	COUNT	Overall FT Improvement	UNE FT Improvement	UNE-L FT Improvement
8150	ORDER HAS BEEN REQUEUED FOR THE MAXIMUM NUMBER OF OCCURRENCES	288	0.06%	0.07%	2.40%
8820	ZTAX SAE 004	153	0.03%	0.04%	1.27%
9685	DUE DATE COULD NOT BE CALCULATED	90	0.02%	0.02%	0.75%
8825	LCON SAE 007	53	0.01%	0.01%	0.44%
8820	RZN SAE 001	26	0.01%	0.01%	0.22%
9686	RESID NOT VALID IN LFACS	19	0.00%	0.00%	0.16%
7725	WAITING PERIOD EQUALS 5 MINUTES	18	0.00%	0.00%	0.15%
7718	UNABLE TO RETRIEVE PSO TO PROCESS SUP	18	0.00%	0.00%	0.15%
8850	CFA NOT FOUND,PLEASE VERIFY CFA	17	0.00%	0.00%	0.14%
8825	ERROR COULD NOT BE DETERMINED	16	0.00%	0.00%	0.13%