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May 10, 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 an original and fifteen copies of BellSouth's Proposed Action Plan in Response to Final Report of the Performance Assessment – Florida and BellSouth's Response to Liberty Consulting Group's Final Audit Report, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. A copy of the same is being provided to all parties of record.

Sincerely,


Robert A. Culpepper

Enclosures

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

DOCUMENT NUMBER-DATE

04552 MAY 10 05

FPSC-COMMISSION CLERK

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 10th day of May, 2005 to the following:

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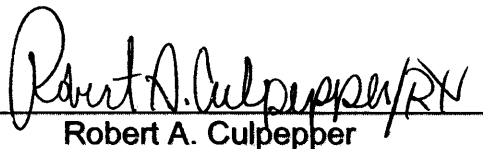
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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166



BellSouth Telecommunications, Inc.

**Response to The Liberty Consulting Group Final Report of the Audit of BellSouth's
Performance Assessment Plan for Florida- April 19, 2005**

May 10, 2005

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Appendix A- Finding Cross Reference

I. Audit Overview

A. BellSouth's Response Format

As has been discussed with the Florida PSC staff, throughout the current Audit, BellSouth has provided detailed responses to each Preliminary Finding as they were issued. Therefore, the purpose of this response is to address only those Findings for which consensus has not been met between BellSouth and Liberty Consulting. For each unresolved Finding, BellSouth will provide a concise three point synopsis: 1) the "Issue" as noted by Liberty, 2) "Liberty's Recommendation" and 3) "BellSouth's Response". BellSouth will also note which findings we believe consensus with Liberty has been met, however, these will contain no synopsis. For those final report findings where we believe consensus has not been reached, we anticipate BellSouth and the Florida PSC will have further discussions to reach agreement regarding the appropriate course of action to close the finding. BellSouth will then amend our response to the finding and reflect this course of action in the response to the Final Audit report.

B. BellSouth's Response Methods

During the course of the audit, BellSouth has utilized a formal project management methodology which has allowed us to be responsive to Liberty's needs. The majority of requests have fallen into three major categories: 1) Data Requests, 2) Interview Requests and 3) Response to Preliminary Findings. To date, BellSouth has responded to 396 data requests, coordinated 27 interview requests and responded to 62 of 63 preliminary findings. The response to the last finding will be submitted prior to the final report and will be addressed if necessary in our final response. To our knowledge all requests have been coordinated within Liberty's expected timeframe. As agreed upon, both Liberty and the Florida PSC staff have been copied on all correspondence. As requested, the Florida PSC staff has been notified of interviews, both in-person and via telephone, and has participated in all interviews.

C. Overall Conclusions

It is BellSouth's opinion the audit has progressed according to the established audit timeline. Working within the established guidelines, all parties were cooperative and flexible, and we are still within the expected timeframe established for the audit. All major milestones have been met within acceptable limits as agreed upon by all parties. We anticipate the audit will conclude close to, if not on the projected due date. BellSouth appreciates both Liberty's and the Florida PSC staff's flexibility and professionalism throughout the course of the audit.

II. Response to Findings and Recommendations- General Review

A) Regulatory Compliance

i) Final Report Finding #1

- a) Issue: BellSouth was not reporting B-10 (Percent Billing Errors Corrected in "X" Business Days) according to the SQM Plan Reporting Requirements. BellSouth indicated that it would like to solicit the advice of the Florida Commission on how to proceed with a correction.¹
- b) Liberty's Recommendation: Correcting the reporting discrepancy to add a line for the total would be a minor programming change to implement. Bellsouth should proceed with an official change request to conform to the SQM Plan reporting requirements.
- c) BellSouth Response: As stated in the original response to the Liberty Preliminary Finding 26, BellSouth agrees that the report disaggregates the measure to a lower level than the current SQM requires. BellSouth continues to maintain that the CLECs are accustomed and prefer the current report structure. Again, BellSouth would like to reiterate the request for

¹ BellSouth Response-Liberty Preliminary Finding 26.

guidance from the Florida Public Service Commission before any changes are made to the report structure.²

ii) Final Report Finding #2

- a) Issue: BellSouth was not reporting C-1 (Collocation Average Response Time) results according to the SQM Plan reporting requirements.
- b) Liberty's Recommendation: BellSouth should modify C-1 to conform to the SQM Plan reporting requirements or seek a red-line change to the SQM Plan to correctly state the format of the C-1 report.
- c) BellSouth Response: As BellSouth stated in its' response to the Liberty Preliminary Finding 28, the volumes for the C-1 metric are extremely low and for reporting purpose, the products are rolled up into the three main categories of Caged, Cageless and Virtual. Since the SQM is in the process of being changed, BellSouth does not propose to change the current reports at this time. Also, since we have not received any requests for the more disaggregated data, it has not significantly impacted users ability to monitor BellSouth's performance.³

iii) Final Report Finding #3- BellSouth and Liberty have reached consensus.

iv) Final Report Finding #4- - BellSouth and Liberty have reached consensus.

B) CLEC Supporting Documentation

i) Final Report Finding #5

- a) Issue: The Florida SQM Plan and SEEM Administrative Plan contain several discrepancies regarding provisions found in Florida Order PSC-02-1736-PAA-TP.

² BellSouth Response-Liberty Preliminary Finding 26.

³ BellSouth Response-Liberty Preliminary Finding 28.

- b) Liberty's Recommendation: BellSouth stated that they will modify the SQM Plan and SEEM Administrative Plan at the direction of the FPSC at the conclusion of the Liberty audit.⁴
- c) BellSouth Response: BellSouth concurs with this Liberty recommendation. BellSouth will modify the Florida SQM at the direction of the Florida Public Service Commission at the conclusion of the audit.

ii) **Final Report Finding #6-** BellSouth and Liberty have reached consensus.

iii) **Final Report Finding #7-** BellSouth and Liberty have reached consensus.

iv) Final Report Finding #8

- a) Issue: BellSouth has provided no evidence that it complied with the Florida Reposting Policy in determining whether errors or changes required reposting.
- b) Liberty's Recommendation: Unless BellSouth conducts the complete analysis necessary to determine whether reposting is necessary, these parties cannot rely on the measure reports nor be assured that they are receiving the correct remedy payments. As of the date of this report, BellSouth had not responded to the issue.
- c) BellSouth Response: BellSouth disagrees with this finding and submitted its response to the Liberty Preliminary Finding 56 on March 31, 2005.

v) Final Report Finding #9

- a) Issue: The SDUM instructions for replicating the SQM/SRS reports were not easy to understand and use.
- b) Liberty's Recommendation: Specifically, Liberty suggests that BellSouth add more description of i) the different tools and platforms available to perform data manipulation and replication, ii) the advantages and drawbacks of the different platforms, and most importantly iii) how to apply the SDUM

⁴ BellSouth Response-Liberty Preliminary Finding 44.

instructions to each platform. Specific examples for the most commonly used tools would be most helpful (e.g., show how to interpret the SQL script to perform manipulations and replications as an Excel user for a specific measure). Additionally, the list of assumptions for the user community provided by BellSouth should be added to the SDUM. If BellSouth added this information to the SDUM, the users would be able to make a much more informed decision when deciding which tool to use to meet their specific needs, and would have a higher probability of success.

- c) **BellSouth Response:** BellSouth believes the current SDUM Replication Manual is sufficient and is functional for the purpose for which it was created. As with any system, improvements are possible. BellSouth has to balance the realistic aspects of functionality, development cost and support in any decisions involving these systems. It is BellSouth's position that it has sufficiently met the requirements set forth by the Commission with the current SDUM Replication Manual. No other party has indicated that the SDUM Replication Manual was insufficient.

vi) Final Report Finding #10- BellSouth and Liberty have reached consensus

vii) Final Report Finding #11

- a) **Issue:** BellSouth did not provide adequate documentation for replication of the results reported in PARIS.
- b) **Liberty's Recommendation:** Liberty does not agree that PARIS replication instructions are intended for auditors. In BellSouth's own response to the finding, it quotes the PARIS Replication Policy. The first sentence begins "CLECs interested in replication..." Furthermore, Liberty would not have been tasked by the Commission to "[v]erify that supporting documentation for replication of PMAP 4.0 and PARIS 2.0 job flows are sufficient, clear, and complete" if the intended audience for the documentation was auditors. More CLECs would consider performing PARIS results replication and analysis if the documentation were available to do so.

- c) BellSouth Response: The PARIS Replication Document was originally created to assist Third-Party Testing Auditors in their replication efforts. However, as various CLECs and Public Service Commissions began requesting the document for their use, the scope of the document was expanded. BellSouth also maintains that PARIS and PMAP systems are very complex and that CLECs and Auditors would need the necessary information technology (IT) skills to replicate the measures. Entities that possess this “IT” knowledge would be able to accurately replicate their metrics. The current documentation provides instructions in the most specific manner possible and is patterned after the instructions provided by other companies. Further, experience contradicts Liberty’s recommendation. Previously, BellSouth had less detailed instructions and the level of interest in replicating SEEM was about the same as it is currently.

viii) Final Report Finding #12

- a) Issue: The Impact Statements provided by BellSouth as part of the Notification Process were unclear and did not accurately state the effect of a proposed change on its associated performance measure.
- b) Liberty’s Recommendation: BellSouth should be required to establish a standard impact assessment policy and practice to guide the analysis associated with any change in performance measures. Key elements of this policy should be 1) Impact assessments performed on a state specific basis 2) The development of a rating scale that clearly articulates the severity of any proposed change. For example, a **Level 1 Impact** could include a change or correction that would alter previously published performance results from a met to miss or vice versa. A **Level 2 Impact** could be where there is no change in the met or miss criteria, but the absolute measures have changed by ± 5 percent. A **Level 3 Impact** could indicate an error or required change that does not influence performance results. Level 1 and Level 2 impacts would generally require Notification. 3) The use of a minimum of three months of the most recent data associated with the

- measure undergoing change. 4) Expand the list of Reasons for Change to include at least Regulatory Orders, Metric Formula Corrections, Process Improvements, Maintenance Changes, and the addition of New Products/Services. BellSouth should also include the Reason for Change in both internal tracking and any Notification submitted to a regulatory body. 5) An affirmative statement in the Notification with regard to whether a Proposed Data Notification has been updated since filed as a Preliminary Data Notification. 6) Notifications should include information regarding whether a reposting was required because of the change.
- c) BellSouth Response: BellSouth has a Change Notification Policy that is currently in effect. The Florida Public Service Commission has adopted the plan and BellSouth believes the plan is sufficient. No changes should be required.

C) Metric Change Control

i) Final Report Finding #13

- a) Issue: The overall interval to process BellSouth's Change Requests was excessive.
- b) Liberty Recommendation: As of the date of this report, BellSouth had not responded to the issue.
- c) BellSouth Response: BellSouth submitted its' response to Preliminary Finding #60 to Liberty Consulting on March 22, 2005. In its' response, BellSouth disagreed with Liberty's assessment that the interval for processing Change Requests is excessive. BellSouth stated that the priority order for working RQ's is as follows: 1) Mandated orders (PSC, FCC, Regulatory), 2) RQs associated with Audit findings and 3) Discretionary RQs (i.e. system performance, etc.). For RQs that impact the CLEC's reports and are not ordered changes, BellSouth has a 90-day notification period that must be met before the changes can be implemented. In some instances, this may lengthen the timeline for any given RQ. As information, the date the

RQ is created is irrelevant. RQ's may be created well in advance of any developmental work that may be required to implement any change to the PMAP system. If Liberty utilized any such RQs, this would have artificially inflated the actual length of time required to implement the associated RQ. Although Liberty used TestDirector data in developing this finding, it's important to note the time length in Test Director for an RQ has no impact on our timeliness of delivery. Mandated orders and RQs associated with audit findings are implemented within given state ordered dates and/or compliance with the CLEC Change Notification process.⁵

ii) Final Report Finding #14

- a) Issue: BellSouth's tracking and monitoring of the metric change control process did not accurately track progress or permit BellSouth management to accurately monitor workflows to determine which process areas are in need of improvement.
- b) Liberty's Recommendation: As of the date of this report, BellSouth had not responded to the issue.
- c) BellSouth Response: BellSouth previously responded to this issue when BellSouth submitted its response to Preliminary Finding 61 on March 16, 2005 to the Liberty Consulting Group. In the response, BellSouth disagrees with Liberty's assessment that there is a "lack of accurate tracking data" in the Planning, Analysis and Change Control processes. Available resources are forecasted using input from the Development Manager. While maintained by the Release Manager, these documents are used by Project Management and/or the Development Manager to determine whether or not additional work can be added to a release. As indicated to Liberty previously, the statuses in Test Director have no impact on the delivery or quality of current or future releases, nor does it impact resource availability. BellSouth also disagrees with Liberty's assertion that scheduling changes are not tracked once an RQ is approved. Changes to previously scheduled

⁵ BellSouth Response-Preliminary Finding 60.

releases are documented in the monthly FCCB agenda and on the corresponding OCCB approval form. Also, status transitions after “scheduled” status are not used in our process to determine ongoing resource availability.⁶

iii) Final Report Finding #15

- a) Issue: BellSouth has not documented well its Performance Measurements Quality Assurance Plan (PMQAP).
- b) Liberty’s Recommendation: Liberty recommends that BellSouth consider making the following updates to the PMQAP documentation: (1) improve the organization and the flow of the document making it easier to follow. This includes making file names uniform throughout the “PMQAP-Contents” and the PMQAP document itself and arranging the files in logical order of the content. (2) improve the process details within the PMQAP package.
- c) BellSouth Response: BellSouth disagrees with this Liberty Finding. As previously stated in BellSouth’s response to the Liberty Preliminary Finding⁷, BellSouth worked with representatives from the applicable work group in creating the PMQAP documentation. The organization of the document is based on the life cycle of service quality (Change Control, Production and Validation). BellSouth believes the PMQAP document is more than sufficient to aid in the assessment of compliance.

⁶ BellSouth Response-Liberty Preliminary Finding 61.

⁷ BellSouth Response-Liberty Preliminary Finding 64.

III. Response to Findings and Recommendations- Data Validation and SQM/SRS Reports

A. Ordering Measures

i) Final Report Finding #16

- a) Issue: BellSouth excluded transactions from the calculation for a measure because it lacked required information about these transactions that were necessary only for another measure.
- b) Liberty's Recommendation: The fact remains that data that could be reported is not. Furthermore, given BellSouth's elaborate system for assigning error codes to transactions, it seems to be quite feasible to use such coding or a modification of it to selectively identify transactions for use in different measure calculations. BellSouth should consider introducing such modifications into its PMAP system.
- c) BellSouth Response: BellSouth strongly feels that the process for excluding records due to missing or invalid fields contained on a record is valid. The same process to exclude any record is consistently applied to both BellSouth and CLEC records ensuring equal treatment in this regard. While it may be technically feasible to make certain coding revisions Liberty suggests in its recommendation, they would be very complex and more importantly, there is no indication that these changes would materially change the measurement results. The number of records excluded is very small compared to the over 100 million records that are processed each month.

ii) Final Report Finding #17

- a) Issue: The retail performance analog for the Local Interconnection Trunk product as documented in BellSouth's SQM Plan for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval), P-4 (Average Completion Interval), (P-9 (Percent Provisioning Troubles

within 30 Days of Service Order Completion), M&R-1 (Missed Repair Appointments), M&R-2 (Customer Trouble Report Rate), M&R-3 (Maintenance Average Duration), M&R-4 (Percent Repeat Trouble Reports within 30 Days) and M&R-5 (out of Service >24 hours) measures is unclear and misleading.

- b) Liberty's Recommendation: Based on these Data Request responses it is still not clear to Liberty what products are being included as the retail analog for Local Interconnection Trunks. Additionally, as opposed to BellSouth's assertion that "Product ID 1's are all Trunks as defined in the Product derivation rules provided to Liberty in a previous response," the only definition given in the Product Derivation Rules for Product ID 1 is "Local Interconnection Trunks" which obviously does not help clarify this issue.⁸ As of the date of this report, BellSouth had not responded to the issue.
- c) BellSouth Response: BellSouth submitted its response to Preliminary Finding 62 on March 24, 2005 to the Liberty Consulting Group.

iii) Final Report Finding #18- BellSouth and Liberty have reached consensus

iv) Final Report Finding #19

- a) Issue: BellSouth has adopted a convention for treating RPONs in O-9 that is not contained in the SQM Plan.
- b) Liberty's Recommendation: Liberty agrees that this provides notification to the CLECs and Commission of the new RPON treatment. However, it would also be helpful to incorporate language in the SQM Plan to specify this business rule.
- c) BellSouth Response: RPONs were not addressed in the SQM for this measure because they could not be submitted electronically for this measure when the SQM was introduced. Like any other new development that must be addressed in the interim before an SQM can be revised under the

⁸ BellSouth Response-Liberty Preliminary Finding 35.

processes specified by this commission, this matter was addressed in the next periodic SQM review.

v) Final Report Finding #20

- a) Issue: BellSouth omits coin orders from O-3 and O-4 reported results.
- b) Liberty's Recommendation: BellSouth does not, however, exclude coin orders from measures that it calculates using the Data Warehouse tables, such as O-9.⁹ This exclusion is not listed in the SQM Plan for O-3 and O-4. As of the date of this report, BellSouth had not responded to the issue.
- c) BellSouth Response: BellSouth has made provisions to begin to report coin LSR's when Flow-Through is migrated in the PMAP Warehouse. The change is being worked under RQ1944. On March 31, 2005, BellSouth submitted and amended response to Liberty Consulting with RQ1944 attached in order to facilitate the closing of this particular finding.¹⁰

B. Provisioning Measures

i) Final Report Finding #21- BellSouth and Liberty have reached consensus

ii) Final Report Finding #22- BellSouth and Liberty have reached consensus

iii) Final Report Finding #23- BellSouth and Liberty have reached consensus

iv) Final Report Finding #24

- a) Issue: BellSouth reported the results for P-3 (Percent Missed Initial Installation Appointments) incorrectly because it included end-user-caused misses in the denominator.
- b) Liberty's Recommendation: BellSouth should clarify the language in the SQM Plan to clearly state that BellSouth does not exclude end-user misses

⁹ Interview #25 (part 2), February 16-17, 2005.

¹⁰ BellSouth Response-Liberty Preliminary Finding 58.

from the calculation of the reported results and that it does, in fact, count end-user misses as completed on time. Alternatively, if the intent of the Commission was to have these end-user miss orders excluded from BellSouth's result and reported separately as stated in the current SQM Plan, then BellSouth should do so.

- c) BellSouth Response: This issue was addressed in the pending review of the SQM as initiated by the Florida Public Service Commission.

v) Final Report Finding #25

- a) Issue: BellSouth incorrectly excluded the majority of the hot cut orders from the calculation of the P-7C (Percent Hot Cut Troubles Received Within 7 Days) measures and excluded a smaller sub-set of orders from the P-7 (Coordinated Customer Conversion Interval) measure.
- b) Liberty's Recommendation: BellSouth issued RQ4989 to correct this problem in March 2004.¹¹ BellSouth did not provide a copy of this RQ to Liberty, and so Liberty could not assess whether the changes would correct the problem identified by this finding.
- c) BellSouth Response: BellSouth submitted an amended response to the Liberty Preliminary Finding #17 on March 31, 2005 which included copies of the specified RQ's.

vi) Final Report Finding #26- BellSouth and Liberty have reached consensus

vii) Final Report Finding #27- BellSouth and Liberty have reached consensus

viii) Final Report Finding #28

- a) Issue: BellSouth incorrectly excluded orders from the calculation of the P-7 (Coordinated Customer Conversion Interval) and the P-7C (Hot Cut Conversions – Percent Provisioning Troubles Received within 7 Days of a

¹¹ BellSouth Response-Liberty Preliminary Finding 17.

Completed Service Order) measures that were properly included in the other in-scope provisioning measures.

- b) Liberty's Recommendation: BellSouth concurred with this finding and issued RQ6059 to correct the problem.¹² BellSouth did not provide a copy of this RQ to Liberty, and so Liberty could not assess whether the changes would correct the problem identified by this finding.
- c) BellSouth Response: BellSouth submitted an amended response to the Liberty Preliminary Finding #20 on March 31, 2005 which included copies of the specified RQ's.

ix) Final Report Finding #29

- a) Issue: BellSouth included orders with invalid conversion durations in the calculation of the P-7 (Coordinated Customer Conversions Interval) measure.
- b) Liberty's Recommendation: BellSouth should seek concurrence within the industry to determine whether its current process of including cutovers with a duration of zero minutes in the calculation of the P-7 results is an acceptable practice. Absent this concurrence BellSouth should move forward with its original plan by implementing RQ6081 to default cutovers with the same start and stop times to a cutover duration of one minute. Alternatively, BellSouth should be required to exclude orders with a zero minute cutover duration from the calculation of its P-7 results.
- c) BellSouth Response: As BellSouth stated in its' amended response to the Liberty Preliminary Finding 21 on March 2, 2005, BellSouth is against defaulting the records to one minute.¹³ The P-7 (Coordinated Customer Conversion Interval) measure is a benchmark type measure. The benchmark for the measure is $95\% \leq 15\text{minutes}$. The interval breakout for the report structure for the P-7 measure is $0 - \leq 5\text{min}$, $\geq 5\text{min} - < 15\text{min}$ and then $\geq 15\text{ mins}$. and then an Overall Average Interval. In the final report, Liberty has

¹² BellSouth Response-Liberty Preliminary Finding 20.

¹³ BellSouth Response-Liberty Preliminary Finding 21.

recommended defaulting the records to one-minute. In reality, the duration on the records are not one-minute, but something less than a minute. Whether BellSouth defaults the duration to 0.333 or 1 minute, the record will still fall into the same interval group as a zero duration record. The only impact of a zero duration order would be on the Overall Average Interval. With the difference between zero and some randomly selected defaulted value being a number of one or less, the impact on the overall average will be relatively null when considering the small number of impacted records. BellSouth feels this change, if made would not impact the parity of the measure.

BellSouth would also like to address the recommendation that Liberty presented about excluding the record all together. The possibility of a conversion having a duration time of less than one minute is highly probable and occurs frequently. There is no evidence to support Liberty's recommendation to exclude these records.

x) **Final Report Finding #30-** BellSouth and Liberty have reached consensus

xi) **Final Report Finding #31**

- a) Issue: BellSouth incorrectly included deny and restore record change orders in the calculation of P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval), and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measure results.
- b) Liberty's Recommendation: Liberty maintains that a deny order is no different than a disconnect order from a customer expectation standpoint (*i.e.*, it turns off the customer's service) and therefore should be excluded from the calculation of the in-scope provisioning measures. BellSouth's practice of excluding disconnect orders but not deny orders from the calculation of the P-3, P-4, and P-9 measures is inconsistent and unsupported by the SQM Plan. This is particularly evident with the P-9 measure as it is impossible to receive

a trouble ticket on a service that has been denied. As such, BellSouth's current practice results in artificially improved reported results for this measure. With respect to restore orders, however, Liberty can understand BellSouth's rationale for including these orders in the measure calculation. BellSouth should clarify in its SQM Plan documentation that its exclusion for "order activities of BellSouth or the CLEC associated with internal or administrative use of local services (record orders, listing orders, test orders, etc.)" does not include record change orders issued to restore a customer's service.

- c) **BellSouth Response:** BellSouth still contends that no change is necessary for this finding. First, Liberty's explanation is inconsistent. At one point they call these record orders and at others, call them disconnect orders. In any event, neither characterization is correct so there is no basis for excluding them from the calculation of the P-3, P-4 and P-9 Measures.¹⁴ Furthermore, BellSouth does not agree with Liberty's perception of BellSouth not adhering to the SQM. BellSouth continues to maintain the position that the CLEC maintains control over the status of the line and submits valid service requests to modify changes to that status as such, these records should continue to be included based on the nature of the work. If any change is warranted, it should be addressed in the next periodic review of the SQM.

xii) Final Report Finding #32- BellSouth and Liberty have reached consensus

xiii) Final Report Finding #33

- a) **Issue:** During its calculation of the monthly SEEM results in PARIS, BellSouth incorrectly excluded transactions from the retail analog of the resale ISDN product for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.

¹⁴ BellSouth Response-Liberty Preliminary Finding 29.

- b) Liberty's Recommendation: BellSouth concurred with this finding and issued RQ6111 to correct the problem identified by Liberty.¹⁵ BellSouth did not provide a copy of this RQ to Liberty, and so Liberty could not assess whether the changes would correct the problem identified by this finding.
- c) BellSouth Response: BellSouth submitted an amended response to the Liberty Preliminary Finding #33 on March 31, 2005 which included copies of the specified RQ's.

xiv) Final Report Finding #34

- a) Issue: The logic used by BellSouth to determine dispatch type misclassified some UNE loop orders when calculating the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.
- b) Liberty's Recommendation : Liberty agrees that the Dispatch-In and Switch Based (which was not addressed in BellSouth's response) classifications are additional disaggregations of the Non-Dispatch category for UNE-Loops, as well as for other products. Liberty also agrees that UNE-Loops are properly reported as Non-Dispatch. However, because Switch-Based is not a valid Non-Dispatch disaggregation for a Non-Dispatched UNE-Loop order, BellSouth should be required to fix the coding problem that is classifying some of its Non-Dispatch UNE-Loop orders into the Switch Based reporting category.
- c) BellSouth Response: As BellSouth stated in its' response to the Liberty Preliminary Finding 34, "all UNE loop orders are reported as Non-Dispatch. Although some orders may be reflected in the data as Dispatch-In, those orders are rolled-up and properly reported as Non-dispatch, as per the current Florida SQM". As noted by Liberty in its preliminary finding, "given the low volume of orders affected by this problem, Liberty did not investigate this any

¹⁵ BellSouth Response-Liberty Preliminary Finding 33.

further”.¹⁶As such, BellSouth agrees with Liberty in that the issue lacks the severity to warrant any coding changes.

xv) Final Report Finding #35

- a) Issue: BellSouth did not include certain wholesale products in its calculation of the SEEM remedy payments for the P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.
- b) Liberty’s Recommendation: In its response BellSouth indicated that RQ6132 has been cancelled. In lieu of this RQ, BellSouth stated that it will correct the problem identified in this finding with RQ6111.¹⁷ BellSouth did not provide a copy of this RQ to Liberty, and so Liberty could not assess whether the changes would correct the problem identified by this finding.
- c) BellSouth Response: BellSouth submitted an amended response to the Liberty Preliminary Finding #40 on March 31, 2005 which included copies of the specified RQ’s.

xvi) Final Report Finding #36

- a) Issue: The SQM and SEEM levels of disaggregation as documented in BellSouth’s SQM Plan were inaccurate and misleading for the UNE-P for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.
- b) Liberty’s Recommendation: Liberty maintains that BellSouth’s SQM documentation of the level of disaggregation required for the SQM and SEEM results for the UNE-P product is inaccurate and misleading. BellSouth should be required to correct this documentation to reflect that for SQM results UNE-P has three levels of disaggregation (Dispatch, Non-Dispatch, Dispatch-in and Non-Dispatch-Switch Based) whereas for SEEM reporting BellSouth only

¹⁶ BellSouth Response-Liberty Preliminary Finding 34

¹⁷ BellSouth Response-Liberty Preliminary Finding 40.

reports two levels of disaggregation, with UNE-P Dispatch orders not included in the SEEM Administrative Plan.

- c) BellSouth Response: BellSouth has been paying the SEEM penalties in accordance with the Florida SEEM Administrative Plan.

xvii) Final Report Finding #37

- a) Issue: BellSouth incorrectly classified UNE Line Splitting orders as UNE-P orders when calculating its results for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval), and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.
- b) Liberty's Recommendation: BellSouth concurred with this finding and issued RQ4871 in April 2004 to correct this problem.¹⁸ BellSouth did not provide a copy of this RQ to Liberty, and so Liberty could not assess whether the changes would correct the problem identified by this finding.
- c) BellSouth Response: BellSouth submitted an amended response to the Liberty Preliminary Finding #46 on March 31, 2005 which included copies of the specified RQ's.

xviii) Final Report Finding #38

- a) Issue: BellSouth neglected to calculate the total impact of multiple errors in determining whether it needed to repost the results for the P-7C (Hot Cut Conversions – Percent Provisioning Troubles Received within 7 Days of a Completed Service Order) measure.
- b) Liberty's Recommendation: BellSouth should recalculate its results for the P-7C measures accounting for all of the problems that this measure experienced when the original results were calculated to determine the impact of these problems on the reported results and penalty payments and to determine if a reposting is necessary.

¹⁸ BellSouth Response-Liberty Preliminary Finding 46

c) BellSouth Response: BellSouth firmly believes that it has consistently followed the Change Notification Policy correctly. In order to be in compliance with the existing policy, BellSouth must develop an impact statement for each change to be proposed. It should be noted that each of these changes are merely “proposed” at this point. They are subject to review by both the CLECs and PSC before they are approved for implementation. Any attempt to group changes as Liberty has proposed would be arbitrary. Would we group them for two months, six months, or one year? What would we do if a change was planned for one month but did not get implemented in that month, does that change how it is handled for reposting? Short of arbitrary rules, there is no logical way to answer questions such as these. This would only create confusion for all parties and would necessitate yet another impact analysis to be created. This could further delay necessary changes from being implemented in a timely manner. As Liberty stated in the Preliminary Finding 47, BellSouth developed the required impacted statements and performed analysis of all of the issues presented in the finding.¹⁹ Therefore, BellSouth contends that no change is required.

xix) Final Report Finding #39- BellSouth and Liberty have reached consensus

xx) Final Report Finding #40

- a) Issue: BellSouth was not including all orders for Local Interconnection Trunks in its calculation of the SEEM remedy payments for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.
- b) Liberty’s Recommendation: BellSouth concurred with this finding indicating that RQ6146 will be implemented on March 18, 2005, to correct it. BellSouth did not provide a copy of this RQ to Liberty, and so Liberty could not assess whether the changes would correct the problem identified by this finding.

¹⁹ Liberty Preliminary Finding 47.

- c) BellSouth Response: BellSouth submitted an amended response to the Liberty Preliminary Finding #49 on March 31, 2005 which included copies of the specified RQ's.

xxi) Final Report Finding #41

- a) Issue: BellSouth was not in conformance with the SQM Plan when calculating service order durations for the P-4 (Average Completion Interval & Order Completion Interval Distribution) measure.
- b) Liberty's Recommendation : BellSouth should be required to update its SQM documentation to clearly state how weekends are treated in the calculation of the in-scope provisioning measure results.
- c) BellSouth Response: BellSouth believes that the current SQM is clear and will initiate Florida SQM changes as directed by the Florida Public Service Commission in the future.

C. Maintenance and Repair Measures

i) Final Report Finding #42

- a) Issue: BellSouth did not properly align the product IDs for troubles and the lines on which they occurred for M&R-2 (Customer Trouble Report Rate), causing mismatches and resulting in assignment of either the troubles or the lines to the wrong sub-measure in SQM reports and SEEM remedy payment calculations.
- b) Liberty's Recommendation: BellSouth replied²⁰ to this finding by indicating that it “agrees with Liberty's assessment with respect to the trouble tickets being assigned the incorrect product ID” and that “it corrected this problem with RQ5673, implemented in the November 2004 data month.” BellSouth has also “opened RQ6147 to address the issue with the trouble reports.”

²⁰ BellSouth Response-Liberty Preliminary Finding 36.

Liberty has not reviewed these RQs and therefore cannot assess whether they should address the issue.

- c) BellSouth Response: BellSouth submitted an amended response to the Liberty Preliminary Finding #36 on March 31, 2005 which included copies of the specified RQ's.

ii) Final Report Finding #43

- a) Issue: BellSouth included special access services in some of its retail analog calculations during the audit period and, after correcting the calculations, failed to perform a complete analysis to determine whether reposting was necessary.
- b) Liberty's Recommendation: BellSouth states that special access circuits were removed from numerous metrics and at such a high level that Z-score analysis was not required due to the technical feasibility standard in the Florida Reposting Policy.²¹ However, BellSouth provided no evidence that reposting was technically infeasible in this case. BellSouth further states that it conducted an impact study, but that the study did not include the required z-score analysis and BellSouth did not retain the study results.
- c) BellSouth Response: The removal of the special access records was an extremely rare and unique situation. BellSouth maintains that it has properly followed the specific guidelines set forth in the Reposting Policy as well as the Change Notification Policy. When the discrepancy was determined: 1) BellSouth notified the CLECs and the Florida Public Service Commission per the Change Notification Policy, 2) BellSouth did conduct an impact analysis on the change of record counts. In this case, Liberty is asking BellSouth to prove a negative proposition, which no one can do.

²¹ BellSouth Response-Liberty Preliminary Finding 38.

iii) Final Report Finding #44

- a) Issue: BellSouth included orders with invalid maintenance durations in the calculation of the M&R-3 (Maintenance Average Duration) measure.
- b) Liberty's Recommendation: As of the date of this report, BellSouth had not responded to the issue.
- c) BellSouth Response: BellSouth disagrees with this finding and submitted its' response to Liberty Consulting Group on March 24, 2005. In the response, BellSouth stated our mechanized systems can, and do verify or analyze data, and perform updates to databases in milliseconds and seconds.²² Prior to mechanization, this process would have taken several minutes and sometimes even hours to perform. BellSouth believes that it is perfectly legitimate to have durations of zero when the open and close times of a ticket are the same, or virtually the same. As information, the LMOS and WFA systems provide the durations to PMAP in hours and minutes. Liberty's comparison to the P-4 measure as a reason for BellSouth to set the duration to something other than zero is flawed. Please note that the P-4 measure specifies in the SQM that the interval is set at .33 when the duration is for a zero-day interval.²³ The SQM has no such language for MR-3. In both these measures, the data for CLECs and BellSouth Retail is treated equally. BellSouth's analysis of the actual data for MR-3 shows there is **no** "bias" to the duration for either the CLEC or BellSouth retail durations for the MR-3 measure as Liberty asserts in its Impact statement.²⁴

iv) Final Report Finding #45

- a) Issue: During its calculation of the monthly SEEM results in PARIS, BellSouth incorrectly excluded ISDN-Basic Rate Interface (ISDN-BRI) Business Design troubles for the M&R-1 (Missed Repair Appointments), M&R-2 (Customer Trouble Report Rate), M&R-3 (Maintenance Average

²² BellSouth Response-Liberty Preliminary Finding 59.

²³ BellSouth Response-Liberty Preliminary Finding 59.

²⁴ BellSouth Response-Liberty Preliminary Finding 59.

Duration), M&R-4 (Percent Repeat Troubles within 30 Days), and M&R-5 (Out of Service > 24 Hours) measures.

- b) Liberty's Recommendation: Liberty did not specifically set forth any specific recommendations or analysis as to the impact of the problem.
- c) BellSouth Response: BellSouth concurred with this Liberty Finding²⁵ and has implemented the changes required to correct the problem.

D. Billing Measures

i) **Final Report Finding #46-** BellSouth and Liberty have reached consensus

ii) **Final Report Finding #47**

- a) Issue: BellSouth's manual process for preparing billing data for the B-1 measure did not contain adequate quality control procedures.
- b) Liberty's Recommendation: BellSouth should expand its process for preparing the billing data that it sends to RADS to include quality control for its manual processing steps. BellSouth informed Liberty that it recently revised the work flow for the manual review process to include additional review and controls procedures, and that it updated the job aids used by the Billing Group analyst to reflect these changes. BellSouth noted that its recently revised work flow should minimize inaccuracies and improve quality control, and that it continues to review the process with an objective of reducing as many manual steps as possible.²⁶
- c) BellSouth Response: As stated in BellSouth's response to the Liberty Preliminary Finding 14, BellSouth has recently revised the process flow and included additional quality control steps to ensure complete accuracy. The process remains manual, but BellSouth is continually looking for ways to improve in the areas of efficiency and accuracy.

²⁵ BellSouth Response-Liberty Preliminary Finding 63.

²⁶ BellSouth Response-Liberty Preliminary Finding 14.

iii) Final Report Finding #48

- a) Issue: BellSouth's process for determining the final adjustment values and the count of adjustments in the calculation of the B-1 measure for both CLECs and BellSouth retail is incomplete and thus does not assure accurate reporting of this measure.
- b) Liberty Recommendation: By implementing more precise methods for coding adjustments and mechanizing more of the adjustment review, BellSouth could further improve result accuracy. BellSouth noted that it implemented mechanical enhancements after the audit period, in the second quarter of 2004, to reduce a significant portion of the manual handling of adjustments.²⁷ BellSouth reiterated that it continues to review its methods to reduce as many manual steps as possible.
- c) BellSouth Response: BellSouth continues to mechanize manual processes. Although this is not a quick change, BellSouth is committed to continually searching for improvements in the area of accuracy. Although currently a manual process, BellSouth strongly believes this process to be accurate as well as sufficient.

iv) Final Report Finding #49

- a) Issue: BellSouth's methods for defining revenues and determine which bills are included in the B-1 measure are not addressed by the SQM Plan.
- b) Liberty's Recommendation: The lack of documentation for BellSouth's conventions for defining revenues and bills could lead to confusion by the Commission and CLECs about what is and is not included in the measure. Additional language for the SQM Plan that makes these conventions explicit could reduce the potential for such confusion. BellSouth stated that it continues to have discussions with CLECs and Commissions regarding the methods of defining this measure. BellSouth also added some additional

²⁷ BellSouth Response-Liberty Preliminary Finding 15.

descriptions language to its job aids regarding the types of charges included and excluded from the measure.²⁸

- c) BellSouth Response: It is not clear why Liberty believes that this is a finding that should apply to BellSouth. While the descriptions of the inclusions and the exclusions are not specifically documented in the Florida SQM, BellSouth believes its internal documentation accurately reflects this information. BellSouth will continually update this documentation as necessary. If clarity in the SQM is needed, this can only be addressed during a periodic review of the SQM as initiated by the Commission.

E. Compliance with PMQAP Data Validation Process

i) Final Report Finding #50

- a) Issue: The BellSouth PMAP production validation process did not update the historical data used in trending analysis to reflect the effect of PMAP system changes.
- b) Liberty's Recommendation: Liberty understands BellSouth's concerns; however, BellSouth should consider enhancements to its process to take into account baseline changes.
- c) BellSouth Response: BellSouth believes it has a comprehensive validation and testing process, with multiple control points which is sufficient for measurement accuracy. As BellSouth pointed out in its response to Liberty Preliminary Finding 41, the updating of baseline information by restating historical results would be extremely burdensome on a small data processing system for the following reasons²⁹: 1) setup and execution of system changes on multiple months of historical data cannot be accomplished in a timely manner relative to validation activities, 2) the approach that Liberty suggested requires maintaining multiple system environments at a production level quality relative to the current month's environment, while simultaneously

²⁸ BellSouth Response-Liberty Preliminary Finding 24.

²⁹ BellSouth Response-Liberty Preliminary Finding 41.

varying from its historic counterpart production environment and 3) there would be an increased risk to managing the validation tools successfully since data would have to be retrieved from a combination of production and restated non-production environments. BellSouth continues to maintain that the existing process provides the necessary information to make informed decisions as to the results of data processing.

ii) Final Report Finding #51

- a) Issue: BellSouth performed no validation to detect invalid zero dollar remedy payments during the audit period.
- b) Liberty's Recommendation: As of the date of this report, BellSouth had not replied to this finding.
- c) BellSouth Response: BellSouth submitted its response on March 24, 2005 to the Liberty Preliminary Finding 54. BellSouth responded that during the audit period, BellSouth used two different methodologies to validate SEEM payments for retail analog, and they ran parallel. One was Darkology, and the other one was non-Darkology (old methodology). With the non-Darkology, zero payments were not validated. However, with Darkology, zero payments were validated. BellSouth runs high level checks, meaning only the statistical rules are checked (Z-score, BCV etc), but not the impacted volume – regardless of whether or not it matched with the PMAP count.³⁰ In other words, first we checked whether or not a company failed, (pass_fail_num = 0), and if so, we determine whether or not the aggregate statistical test (Aggr Z score) was less than zero. If it didn't fail (pass_fail_num =0) and the aggregate statistical test was negative, then we determine if the Aggregate Z score was less that the balancing critical value. All of the requirements were placed in a query that was run monthly by each Analyst, and any records returned were considered anomalies. As such, further investigation was required to determine the cause of the anomalies.³¹

³⁰ BellSouth Response-Liberty Preliminary Finding 54.

³¹ BellSouth Response-Liberty Preliminary Finding 54.

IV. Response to Findings and Recommendations- Remedy Payments

A. Remedy Payment Replication

i) **Final Report Finding #52-** BellSouth and Liberty have reached consensus

ii) **Final Report Finding #53**

- a) Issue: BellSouth did not make remedy payments for failures associated with the O-3 and O-4 (Percent Flow-Through Service Requests) measures in accordance with the SEEM Administrative Plan.
- b) Liberty's Recommendation: As of the date of this report, BellSouth had not responded to the issue.
- c) BellSouth Response: BellSouth submitted its' original response to Liberty Consulting Group on February 25, 2005 concerning Preliminary Finding 32. Subsequent to sending the response, BellSouth and Liberty conducted informal interviews to clarify the BellSouth response and continued to discuss discrepancies with records. As a result, BellSouth submitted an amended response on March 18, 2005 to formally include a spreadsheet that Liberty had submitted to BellSouth for review and BellSouth had investigated the discrepancies still outstanding and included explanations for each record.³²

iii) **Final Report Finding #54-** BellSouth and Liberty have reached consensus

iv) **Final Report Finding #56**

- a) Issue: BellSouth did not calculate remedy payments for M&R-2 (Customer Trouble Report Rate) according to the SEEM Administrative Plan.

³² BellSouth Response-Liberty Preliminary Finding 32.

- b) Liberty's Recommendations: As of the date of this report, BellSouth had not yet fully responded to the issue.
- c) BellSouth Response: BellSouth submitted its' original response on February 18, 2005 and subsequently initiated the following RQ's: RQ6148, RQ6149, RQ6150, RQ6151, RQ6152, RQ6003 and RQ6040. On March 31, 2005, BellSouth Amended the response to this finding to included copies of all of the RQ's associated with this response. BellSouth has since confirmed with Liberty Consulting that they have received a full response to the finding.

v) Final Report Finding #56

- a) Issue: BellSouth did not have adequate and consistent documentation for its SEEM remedy payment calculation process, which may have contributed to erroneous calculations.
- b) Liberty's Recommendations: BellSouth responded that it would clarify the language of the plan. However, BellSouth did not state that it agreed with the finding.³³
- c) BellSouth Response: As previously stated in BellSouth's response to Preliminary Finding 42, BellSouth can provide a template that shows, per measure, the exact characteristics necessary to construct a cell. In addition, definitions can also be included to explain both the cell itself as well as the characteristics.³⁴ These job aids could be inserted in the SEEM Replication Manual, which was created as a supplement to the SEEM Administrative Plan in an attempt to provide interested third parties with the documentation necessary to successfully replicate SEEM results. BellSouth will provide this information at the direction of the Florida Public Service Commission.

vi) Final Report Finding #57- BellSouth and Liberty have reached consensus

³³ BellSouth Response-Liberty Preliminary Finding 42.

³⁴ BellSouth Response-Liberty Preliminary Finding 42.

B. Remedy Payment and Adjustments Process

i) Final Report Finding #58

- a) Issue: The BellSouth CLEC Administration table update process caused delayed penalty payments to CLECs.
- b) Liberty's Recommendation: BellSouth responded to this finding with a detailed explanation of the process for establishing CLEC account information in PARIS.³⁵ However, BellSouth did not explicitly provide the reason for the large number of payment delays that Liberty observed. BellSouth should reexamine its process to determine whether there are ways to assure timely rendering of remedy payments.
- c) BellSouth Response: In BellSouth's response to the Liberty Preliminary Finding 7, BellSouth went through great detail in explaining the reason for the late payments. BellSouth explained the process of how billing accounts are established and how a company is established in PARIS.³⁶ There is necessary paperwork required from the CLEC in order to process payments electronically through the STAR system. Companies that fail to correctly complete the information or keep the information up-to-date can cause their payments to be late. If the Company is due payments from BellSouth and their information is not accurate, the payment goes into a "HELDPROP" (held proposed) status. BellSouth then has to research each payment and make sure the corrections are in place before the transaction can be processed.³⁷

ii) Final Report Finding #59

- a) Issue: BellSouth does not have a process in place to ensure that all remedies for a given reporting month are eventually paid.
- b) Liberty's Recommendation: BellSouth should develop a payment status tracking and reporting process which allows updates from STAR back to PARIS at the item level. Additionally, reports within PARIS should identify

³⁵ BellSouth Response-Liberty Preliminary Finding 7.

³⁶ BellSouth Response-Liberty Preliminary Finding 7.

³⁷ BellSouth Response-Liberty Preliminary Finding 7.

those items for a given reporting month that have not been paid. As of the date of this report, BellSouth had not responded to the issue.

- c) **BellSouth Response:** BellSouth submitted its' response to the Liberty Preliminary Finding 57 on March 23, 2005. In its response, BellSouth disagreed with Liberty's assessment that "BellSouth lacked a process to ensure that it made all remedy payments for a specific reporting month."³⁸ When BellSouth calculates the monthly remedies during the SEEM Monthly cycle, BellSouth is calculating all the remedies that are due and payable for the given reporting month. Monthly payments to CLECs may contain adjustments and prior month's remedies; *only* when an adjustment or payment for a previous month's remedy is required due to a finding in the original calculation that requires correction. Corrections are indeed necessary to ensure that the proper remedy is paid to the CLEC in order to comply with the administration of the SEEM plan. As documentation, BellSouth attached two flow charts (SEEM Monthly Cycle *see Finding 57 Attachment_1.ppt* and PARIS AP Work Flow Diagram *see Finding 57 Attachment_2.ppt*) to the response. The SEEM Monthly Cycle flow identifies the actual process flow for the overall SEEM cycle, with each major task responsibility assigned to the group responsible for the completion of the particular task. The PARIS AP Work Flow identifies the transition of *each* PARIS transaction through each status code from the moment the transaction is "PROPOSED" to "TRANSMITTED" (paid). Task responsibility is also assigned per the flow chart to show group responsibility for the movement of each transaction throughout the life cycle of the PARIS transaction. BellSouth went on to state that process improvements have been implemented since the timeframe of this audit to facilitate the actual balance procedures between the PARIS and STAR systems.³⁹ However, prior even to these process improvements, the actual monthly payments were balanced which is evidenced by the Liberty statement: "BellSouth was able to account for the differences." Monthly

³⁸ BellSouth Response-Liberty Preliminary Finding 57.

³⁹ BellSouth Response-Liberty Preliminary Finding 58.

payment amounts are reported to the CLECs and Commissions through access to the PARIS reporting system via the PMAP website.⁴⁰

⁴⁰ BellSouth Response-Liberty Preliminary Finding 58.

APPENDIX A- Findings Cross Reference

Final Report Finding No.	Draft Report Finding No.	Preliminary Finding No.
1	1	26
2	2	28
3	3	27
4	4	39
5	5	44
6	6	9
7	7	3
8	8	56
9	9	25
10	10	16
11	11	1
12	12	31
13	13	60
14	14	61
15	N/A	64
16	15	43
17	16	62
18	17	52
19	18	53
20	19	58
21	20	4
22	21	5
23	22	12
24	23	13
25	24	17
26	25	18
27	26	19

Final Report Finding No	DRAP Report Finding No	Preliminary Finding No
28	27	20
29	28	21
30	29	22
31	30	29
32	31	30
33	32	33
34	33	34
35	34	40
36	35	45
37	36	46
38	37	47
39	38	48
40	39	49
41	40	50
42	41	36
43	42	38
44	43	59
45	N/A	63
46	44	23
47	45	14
48	46	15
49	47	24
50	48	41
51	49	54
52	50	8
53	51	32
54	52	35
55	53	37
56	54	42

Final Finding No.	Draft Report Finding No.	Preliminary Finding
57	55	51
58	57	7
59	58	57

**BellSouth's Proposed Action Plan
In Response to Final Report of the Performance Assessment - Florida**

Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
1	BellSouth was not reporting B-10 according to the SQM Plan Reporting Requirements.	BellSouth should consult with the Commission to determine further steps. Options - (1) proceeding with an official CR to conform to the SQM Plan reporting requirements, or (2) seeking a red-line change to the SQM Plan to match the current format of the B-10 report.	Disagree	The current format of the B-10 PMAP report is the original configuration created for this measure. As these reports were converted to the new SRS format, the reports were left unchanged and forwarded to the Commission and CLECs for review. To date, no issues have been raised regarding the format of the report and the necessity of having to sum the rows in order to determine pass/fail.	BellSouth will implement the new adopted Florida SQM Plan.
2	BellSouth was not reporting C-1 results according to the SQM Plan reporting requirements.	BellSouth should consult with the Commission to determine further steps. Options - (1) modifying C-1 to conform to the SQM Plan reporting requirements, or (2) seeking a red-line change to the SQM Plan to match the current format of the C-1 report.	Disagree	The volumes for the C-1 metric are extremely low and for reporting purpose, the products are rolled up into three main categories of Caged, Cageless and Virtual. Since the SQM is in the process of being changed, BellSouth does not propose to change the current reports at this time. Also, since we have not received any requests for the more disaggregated data, it has not significantly impacted users ability to monitor BellSouth's performance.	BellSouth will implement the new adopted Florida SQM Plan.
3	For measure CM-8, BellSouth was not reporting according to the SQM Plan reporting requirements.	RQ issued by BellSouth should correct this issue.	Agree		RQ6071 - Scheduled for release 4.5.04 (May '05)
4	BellSouth did not report the Z-scores according to the SQM Plan reporting requirements in the 12-month PMAP reports for measures P-2B, M&R-3, B-7, and B-8	RQs issued by BellSouth should correct these issues.	Agree		RQ6115 Scheduled for release 4.5.07 (August '05) RQ6112 Scheduled for release 4.5.05 (June '05) RQ6110 Scheduled for release 4.5.08 (September '05)
5	The FLA SQM Plan and SEEM Administrative Plan contain several discrepancies regarding provisions found in Florida Order PSC-02-1736-PAA-TP.	Though Liberty acknowledges that the discrepancies are minor, they also advise that correcting them will minimize confusion.	Disagree	BellSouth will modify the SQM Plan and the SEEM Administrative Plan at the direction of the FPSC at the conclusion of the Liberty audit.	BellSouth will implement the new adopted Florida SQM and SEEM Administrative Plan

**BellSouth's Proposed Action Plan
In Response to Final Report of the Performance Assessment - Florida**

Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
6	For measure OSS-2, the availability report at BellSouth's Interconnection website is missing entries for many of the OSS listed in Appendix D of the SQM Plan.	Liberty finds that BellSouth is attempting to resolve the issue. When completed, the proposed changes to the SQM Plan should correct the issue.	Agree	The website reports reflect the requirements of the current SQM	BellSouth will implement the new adopted SQM and the website will reflect Appendix "C" of the new SQM plan.
7	BellSouth posts only the most recent month of PARIS reports for viewing by the CLECs on the PMAP website. Historical PARIS reports are not available. This is in contrast to BellSouth's practice of having previous months' reports available for a full year for the majority of SQM Plan reports.	BellSouth issued RQs 5649 and RQ6008, and these changes should correct the issue.	Agree		RQ5949 - Implemented in the 4.4.09 Release RQ6008 - Implemented in the 4.5.02 Release
8	BellSouth has provided no evidence that it complied with the Florida Reposting Policy in determining whether errors or changes required reposting.	Liberty recommends that BellSouth reexamine, update, and completely document its reposting procedure to assure that its analysts fully comply with the requirements of the Reposting Policy. This procedure should include the requirement that the analysts perform all the calculations required by the Policy for the measures and jurisdictions affected by any defect potentially requiring reposting, that they document those calculations in sufficient detail as to be auditable, and that the documentation be maintained for a reasonable period of time.	Disagree	BellSouth disagrees that we did not provide any evidence that we complied with the Reposting Policy. However, we agree that there needs to be updates to the reposting procedures.	BellSouth revised its Reposting procedures on March 16, 2005. We revised our procedures and we have now implemented documentation to assess reposting criteria. This was implemented with the January 2005 data.

**BellSouth's Proposed Action Plan
In Response to Final Report of the Performance Assessment - Florida**

Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
9	The SDUM instructions for replicating the SQM/SRS reports were not easy to understand and use.	BellSouth should consult with the Commission and the CLECs to determine further steps, to include an assessment of the extent of the CLECs requirements for and use of the SDUM and the cost effectiveness of implementing and maintaining an improved SDUM Replication Manual.	Disagree	BellSouth believes the current SDUM Replication Manual is sufficient and functional for the purpose for which it was created. BellSouth believes it has sufficiently met the requirements set forth by the Commission with the current SDUM Replication Manual. No other party has indicated that the SDUM Replication Manual was insufficient.	No further action required
10	The SQL scripts contained in the SDUM document for M&R-2 did not replicate CLEC results properly.	RQ issued by BellSouth should correct this issue.	Agree		RQ6044 - Implemented in the 4.5.02 Release
11	BellSouth did not provide adequate documentation for replication of the results reported in PARIS.	BellSouth should consult with the Commission and the CLECs to determine further steps, to include an assessment of the extent of the CLECs requirements for and use of remedy payment replication and the cost effectiveness of implementing and maintaining an improved remedy payment replication process.	Disagree	BellSouth maintains that PARIS and PMAP systems are very complex, and that CLECs and Auditors would need the necessary information technology skills to replicate the measures. Entities that possess these skills can accurately replicate their metrics. The current documentation provides instructions in the most specific manner possible and is patterned after the instructions provided by other companies. Further, BellSouth' experience contradicts Liberty's recommendation.	No further action required

**BellSouth's Proposed Action Plan
In Response to Final Report of the Performance Assessment - Florida**

Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
12	The Impact Statements provided by BellSouth as part of the Notification process were unclear and did not accurately state the effect of a proposed change on its associated performance measures.	Though the Impact Statements Liberty review technically complied with the GA PSC's Order, Liberty does not believe the process provided timely and sufficient information for the Commission and CLECs to assess the true effect of many of the changes. Liberty identified 8 issues. Liberty also recommends that these workshops address the possibility of establishing a standard impact assessment policy and practice to guide the analysis associated with any change in performance measure. Key elements of this policy were provided.	Disagree	BellSouth' current Change Notification Policy has been adopted by the FPSC. BellSouth believes this Plan is sufficient and no changes should be required.	No further action required
13	The overall interval to process BellSouth's Change Requests was excessive.	Liberty recommends that BellSouth consider ways to improve its change management process in order to expedite the implementation of its Change Requests.	Disagree	BellSouth's order of priority for working RQ's is: (1) Mandated orders (2) RQs associated with Audit findings, and, (3) Discretionary RQ's. For RQs that impact the CLEC reports and are not ordered changes, BellSouth has a 90-day notification period that must be met before the changes can be implemented. Mandated orders and RQs associated with audit findings are implemented within state ordered dates and/or compliance with the CLEC Change Notification process.	No further action required
14	BellSouth's tracking and monitoring of the metric change control process did not accurately track progress or permit BellSouth management to accurately monitor workflows to determine which process areas are in need of improvement.	Liberty recommends that BellSouth consider ways to improve its change management process in order to improve the monitoring, accountability, and controls in the process.	Disagree	BellSouth maintains that the current process; a combination of TestDirector, FCCB Agenda and the OCCB approval form, associated with the Management oversight of those processes provides adequate monitoring, accountability and control.	No further action required

**BellSouth's Proposed Action Plan
In Response to Final Report of the Performance Assessment - Florida**

Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
15	BellSouth has not documented well its Performance Measurements Quality Assurance Plan.	Liberty recommends that BellSouth consider updating its PMQAP documentation to address the areas noted for the Measurement Analyst Data Validation Process, the PMAP Production Validation Process and the PMAP Production Life Cycle and Change Control Process: Status Definitions and Flow.	Disagree	BellSouth disagree with the extent of level of detail Liberty feels this document should be updated. BellSouth acknowledges that there are areas for improvement, and can be updated. We recognize that there are some areas that need to be revised, and we will do so.	BellSouth commits to update the PMQAP every six (6) months, as needed.
16	BellSouth excluded transactions from the calculation for a measure because it lacked required information about these transactions that were necessary only for another measure.	BellSouth should consider modifying its PMAP system to include CLEC or BellSouth retail records with an error code in the measurements. And, Liberty recommends that BellSouth conduct a study using the data from one or two months to determine the number of the transactions that it excluded from the SQM and SEEM calculations but for which there was insufficient information to be included in the calculation for some of the measures.	Disagree	BellSouth strongly feels that the process for excluding records due to missing or invalid fields contained on a record is valid. In fact, the same process is applied to both BellSouth and CLEC records, thereby ensuring equal treatment...	No further action required
17	The retail performance analog for the Local Interconnection Trunk product as documented in BellSouth's SQM Plan for the P-3, P-4, P-9, M&R-1, M&R-2, M&R-3, M&R-4 and M&R-5 measures is unclear and misleading.	BellSouth should consult with the Commission to determine what further steps are necessary.	Disagree	BellSouth has advised that the language in the SQM Plan will be modified at the direction of the FPSC.	Implement revised wording per new SQM
18	BellSouth incorrectly reported certain LNP orders as INP Standalone orders in the O-9, and P-9 results.	The proposed SQL Plan revisions, to eliminate all product disaggregations involving INP, should correct this problem.	Agree	BellSouth has proposed changes in the Florida Proposed SQM concerning product disaggregations to address this issue..	Implement revised wording per new SQM

**BellSouth's Proposed Action Plan
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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
19	BellSouth has adopted a convention for treating related PONs in O-9 that is not contained in the SQM Plan	BellSouth should discuss the issue (i.e., to specify the related PON business rule) with the Commission in the context of the periodic SQM reviews to determine the necessity of this change.	Disagree	BellSouth submitted a Notification on 10/1/03 which outlined the treatment of related PONs for the O-9 measure.	No further action required
20	BellSouth omits coin orders from O-3 and O-4 reported results.	There is insufficient information in the documentation of RQ1944 for Liberty to determine whether it will address the issue.	Agree		RQ1944 - Schedule for release 4.5.07 (August '05)
21	For the time period of this audit BellSouth was inappropriately excluding non-coordinated hot cuts from the calculation of the measure results for P-7C.	Liberty believes that RQ4128 should correct the problem.	Agree		RQ4128 - Implemented in the 4.4.03 Release
22	BellSouth did not include the translation time necessary to place the line back in full service when calculating the measure results for P-7.	BellSouth should include the translation time in the calculation of the P-7 measure.	Agree		The language concerning the inclusion of the CLEC translation time in the calculation of the P-7 measure has been removed from the proposed new Florida SQM.
23	BellSouth was misclassifying certain orders with a PR-17 error code thereby incorrectly excluding these orders from the calculation of the P-3 results.	Liberty believes that RQ6033 should correct the problem.	Agree		RQ6033 - Scheduled for the 4.5.05 Release (June '05)
24	BellSouth reported the results for P-3 incorrectly because it included end-user caused misses in the denominator.	BellSouth should exclude end-user miss orders from BellSouth's results and report them separately as stated in the current SQM Plan. Alternatively, BellSouth should clarify the language in the SQM Plan to state clearly that BellSouth does not exclude end-user misses from the calculation of the reported results and that it does, in fact, count end-user misses as completed on time.	Agree		This issue was addressed in the recently completed review of the SQM as initiated by the Florida PSC.

**BellSouth's Proposed Action Plan
In Response to Final Report of the Performance Assessment - Florida**

Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
25	BellSouth incorrectly excluded the majority of the hot cut orders from the calculation of the P-7C measures and excluded a smaller subset of orders from the P-7 measure.	RQ4989 should resolve the issue.	Agree		RQ4989 - Implemented in the 4.4.03 Release
26	BellSouth did not include disconnect service orders associated with Standalone LNP activity in the measure calculation for P-4.	Since BellSouth is reporting disconnect service orders associated with LNP in the P-13D measure, BellSouth should update the SQM Plan to remove the requirement to count these orders in the calculation of the P-4 measure and has agreed to do so.	Agree		This issue was corrected to read 'disconnect orders' in P4 OCI, in the recently completed Florida SQM review.
27	BellSouth incorrectly included certain record change orders in the calculation of the P-3, P-4, and P-9 measurement results.	RQ6039 should correct the problem	Agree		RQ6039 - Scheduled for the 4.5.05 Release (June '05)
28	BellSouth incorrectly excluded orders from the calculation of the P-7 and the P-7C measures that were properly included in the other in-scope provisioning measures.	There was insufficient info on the RQ6059 documentation to assess whether this RQ will resolve the issue.	Agree		RQ6059 - Scheduled for the 4.5.05 Release (June '05)
29	BellSouth included orders with invalid conversion durations in the calculation of the P-7 measure.	BellSouth should seek concurrence with the Commission as to whether its current process of including cutovers with a zero-minute duration in the calculation of the P-7 results is an acceptable practice, given that it only affects the reporting of the average interval results.	Agree		Any necessary changes in this measure will be addressed with the implementation of the new Florida SQM Plan.

**BellSouth's Proposed Action Plan
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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
30	For P-3, BellSouth included certain cancelled orders in both the numerator and denominator of the SQM results calculation, but included the same orders only in the denominator of the SEEM results.	BellSouth issued RQ5037 which should rectify the specific problem in the Finding. However, the RQ poses another problem. Specifically, it treats orders cancelled after the due date which have a null value in the missed appointment field as met appointments, even though the orders may have been cancelled as a result of the appointments that BellSouth actually missed.	Agree		RQ5037 - Implemented in the 4.4.06 Release
31	BellSouth incorrectly included deny and restore record change orders in the calculation of P-3, P-4, and P-9 measure results.	BellSouth should seek input from the Commission and the other stakeholders of the SQM and SEEM Administrative Plans as to whether it should include deny and restore orders in the calculation of the P-3, P-4 and P-9 measure results. Based on such input, BellSouth should either change its current practice or modify the SQM Plan to reflect that practice.	Disagree	Denial or restoral orders are not record orders and require provisioning activity; therefore they should be included in the specified measures. Denial and restoral services orders are not internal or administrative work activity.	No further action required
32	BellSouth overstated the CLEC circuit counts for P-7C by doubling the SL1 Loop volume.	Though RQ6111 was issued to correct the problem, there was insufficient information in the documentation to assess whether it will fix the problem.	Agree		RQ6111 - Implemented in the 4.5.02 Release
33	During its calculation of the monthly SEEM results in PARIS, BellSouth incorrectly excluded transactions from the retail analog of the resale ISDN product for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.	Though RQ6111 was issued to correct the problem, there was insufficient information in the documentation to assess whether it will fix the problem.	Agree		RQ6111 - Implemented in the 4.5.02 Release

**BellSouth's Proposed Action Plan
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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
34	The logic used by BellSouth to determine dispatch type misclassified some UNE loop orders when calculating the P-3, P-4 and P-9 measures.	BellSouth should consider fixing the coding problem which results in the classification of some of its Non-Dispatch UNE-Loop orders in the Switch Based reporting category. However, given the low volume of orders affected by this problem, Liberty agrees with BellSouth that the issue lacks the severity to warrant coding changes if these changes are complex to implement.	Disagree	Although some orders may be reflected in the data as Switch-Based, those orders are rolled up and properly reported as Non-Dispatch, as per the current FLA SQM.	BellSouth will implement the new adopted Florida SQM Plan
35	BellSouth did not include certain wholesale products in its calculation of the SEEM remedy products for the P-9 measure.	Though RQ6111 was issued to correct the problem, there was insufficient information in the documentation to assess whether it will fix the problem.	Agree		RQ6111 - Implemented in the 4.5.02 Release
36	The SQM and SEEM levels of disaggregation as documented in BellSouth's SQM Plan were inaccurate and misleading for the UNE-P product for the P-3, P-4 and P-9 measures.	Liberty believes that BellSouth should clarify this documentation to reflect that that for SQM results UNE-P has three levels of disaggregation whereas for SEEM reporting BellSouth only reports two levels of disaggregation, with UNE-P Dispatch orders not included in the SEEM Admin Plan. Liberty recommends that BellSouth consult with the Commission to determine further steps, if necessary.	Disagree	BellSouth is in compliance with the current SEEM, which does not include dispatch UNE-P. Such orders will be included in the recently approved new SEEM.	No further action required
37	BellSouth incorrectly classified UNE Line Splitting orders as UNE-P orders when calculating its results for the P-3, P-4, and P-9 measures.	Though RQ4871 was issued to correct the problem, there was insufficient information in the documentation to assess whether it will fix the problem.	Agree		RQ4871 - Implemented in the 4.4.04 Release

**BellSouth's Proposed Action Plan
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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
38	BellSouth neglected to calculate the total impact of multiple errors in determining whether it needed to repost the results for the P-7C measure.	Liberty recommends that BellSouth, the Commission, and the other stakeholders review the current reposting policy to determine whether it appropriately identifies situations that require reposting.	Disagree	BellSouth firmly believes that it has consistently followed the Change Notification Policy.	No further action required
39	BellSouth's documentation in the SQM Plan for the P-7C is contradictory and misleading.	The documentation for the P7-C measure in BellSouth's SQM Plan is unclear about whether this measure includes all hot cut order activity or only hot cut order activity that involved a coordinated hot cut.	Agree		The new FLA SQM Plan, approved by this Commission, addresses this issue by reflecting the inclusion of all hot cut circuits, both non-coordinated and coordinated.
40	BellSouth was not including all orders for Local Interconnection Trunks in its calculation of the SEEM remedy payments for the P-3, P-4, and P-9 measures.	BellSouth issued RQ6146 to correct this problem. There was insufficient information in the RQ documentation to assess whether it will resolve the issue.	Agree		RQ6146 - Implemented in the 4.5.02 Release
41	BellSouth was not in conformance with the SQM Plan when calculating service order durations for the P-4.	BellSouth should update its SQM documentation to clearly state how weekends are treated in the calculation of the in-scope provisioning measure results. BellSouth should consult with the Commission to determine what further steps are necessary.	Disagree	BellSouth believes that the current SQM is clear and will initiate Florida SQM changes as directed by the Florida Public Service Commission.	The new FLA SQM Plan, approved by this Commission, addresses this issue.
42	BellSouth did not properly align the product IDs for troubles and the lines on which they occurred for M&R-2, causing mismatches and resulting in assignment of either the troubles or the lines to the wrong sub-measure in SQM reports and SEEM remedy payment calculations.	BellSouth issued RQ5673 and 6147 to address these issues. Neither RQs contain enough detail about BellSouth's process changes to enable Liberty to assess whether they will fix the problem identified.	Agree		RQ5673 - Implemented in the 4.4.11 Release RQ6147 - Pending, high priority

**BellSouth's Proposed Action Plan
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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
43	BellSouth included special access services in some of its retail analog calculations during the audit period and, after correcting the calculations, failed to perform a complete analysis to determine whether repositing was necessary.	BellSouth reported some changes at the sub-measure level that Liberty feels may be significant, but there's not enough information to determine whether repositing was required. BellSouth has provided no evidence that repositing was technically infeasible in the case related to special access circuits.	Disagree	Special access circuits were removed from numerous metrics, and at such a high level that z-score analysis was not required due to the technical feasibility standard in the Florida Reposting Policy. BellSouth has properly followed the guidelines in the Reposting Policy and the Change Notification Policy.	No further action required
44	BellSouth included orders with invalid maintenance durations in the calculation of the M&R-3 measure.	Liberty cannot verify BellSouth's assertions regarding its back-end maintenance systems and processes and any data generated by those systems since analysis of these systems are not within the scope of the Audit. Liberty believes the analogy with the P-4 measure regarding the treatment of zero durations is sound. Liberty recommends that BellSouth seek input from the Commission and other stakeholders of the SQM and SEEM Administrative Plans regarding treatment of zero trouble durations. These discussions should address the advisability and feasibility of either replacing the zero durations with non-zero default durations or excluding trouble tickets showing zero duration from the M&R-3 measure altogether. The discussions should also consider the feasibility and advisability of calculating trouble durations within PMAP, rather than using durations derived directly from the source systems.	Disagree	BellSouth's treatment of these records was correct. Liberty agrees that there is no basis for excluding these records. BellSouth agrees that a default duration may be appropriate in this case, but no such default exist in the SQM.	BellSouth will address this issue in the next scheduled SQM Review

**BellSouth's Proposed Action Plan
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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
45	During its calculation of the monthly SEEM results in PARIS, BellSouth incorrectly excluded ISDN-Basic Rate Interface Business Design troubles for the M&R-1, M&R-2, M&R-4, M&R-5 measures.	BellSouth is addressing the issue through RQ6111. However, Liberty does not have sufficient information to determine whether this change will fully correct the problem.	Agree		RQ6111 - Implemented in the 4.5.02 Release
46	For the B-1 measure, BellSouth did not define the adjustments it includes in a report month consistently for all bills.	BellSouth's proposed clarification to the SQM Plan should resolve the matter.	Disagree	BellSouth will add, subject to Commission approval, clarifying language to the SQM Plan.	The new SQM contains the revised language.
47	BellSouth's manual process for preparing billing data for the B-1 measure did not contain adequate quality control procedures.	BellSouth should expand its process for preparing the billing data that it sends to RADS to include quality control for its manual processing steps.	Agree		BellSouth has revised the work flow for the manual review process to include additional review and controls procedures, and updated the applicable job aids used by the Billing Group Analyst. This revised work flow should minimize inaccuracies and improve quality control. BellSouth will continue to review the process with an objective of reducing manual steps.
48	BellSouth's process for determining the final adjustment values and the count of adjustments in the calculation of the B-1 measure for both CLECs and BellSouth retail is incomplete and thus does not assure accurate reporting of this measure.	By implementing more precise methods for coding adjustments and mechanizing more of the adjustment review, BellSouth could further improve result accuracy.	Disagree	BellSouth disagrees with Liberty's assessment. While our performance might be better if we were to review every adjustment below \$1,000 to exclude those which are applicable, we don't believe it would have any appreciable effect on the results. In any event, such action would only improve BellSouth's performance.	No further action required.
49	BellSouth's methods for defining revenues and determine which bills are included in the B-1 measure are not addressed by the SQM Plan.	Since it would be helpful to incorporate language in the SQM Plan to define the revenues and bills included in the B-1 measure, Liberty recommends that BellSouth discuss the issue with the Commission in the context of the periodic review to determine the necessity of this change.	Disagree	BellSouth complies with the current SQM. If clarity in the SQM is needed, this can only be addressed during a periodic review of the SQM as initiated by the Commission.	Language was clarified in the new SQM.

**BellSouth's Proposed Action Plan
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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
50	The BellSouth PMAP production validation process did not update the historical data used in trending analysis to reflect the effect of PMAP system changes. BellSouth should consider enhancements to its process to take into account baseline changes.	Proactive restatement of historical results would improve statistical reliability and the efficiency of the ongoing PMAP production validation process.	Disagree	BellSouth believes that its overall validation process accommodates assessing the impact of changes to the PMAP system. We believe our existing process provides the necessary information to make informed decisions as to the results of data processing.	No further action required
51	BellSouth performed no validation to detect invalid zero dollar remedy payments during the audit period.	The lack of a comprehensive zero dollar payment validation process may result in underpayments to either CLECs or the FLA PSC. BellSouth's written response contradicts the interview. If BellSouth has implemented a process that consistently includes the examination of zero-dollar remedy payments across all SEEM measures, the issue in this Finding is resolved.	Disagree		No further action required as Liberty acknowledged that this issue has been resolved.
52	BellSouth was not calculating the parity measures involving Tier 1 averages according to the SEEM Administrative Plan.	BellSouth issued RQ6040, which should address the issues raised in this Finding.	Agree		RQ6040 - Scheduled release 4.5.05 (June '05)
53	BellSouth did not make remedy payments for failures associated with O-3 and O-4 measures in accordance with the SEEM Administrative Plan.	BellSouth issued RQs 5631, RQ4932 and RQ5087, and, if properly implemented, should correct the discrepancies noted in this Finding.	Agree		RQ5631 - Implemented in the 4.4.06 Release RQ4932 - Implemented in the 4.4.02 Release RQ5087 - Implemented in the 4.4.04 Release

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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
54	BellSouth did not calculate the remedy payments for percentage parity measures.	BellSouth issued the following RQs to correct the issue: RQ6148, RQ6149, RQ6150, RQ6151, RQ6152, RQ6003, and RQ6040. If properly implemented, the issues will be resolved.	Agree		<p>RQ6148 - Implemented in the 4.5.03 Release</p> <p>RQ6149- Scheduled to be in the 4.5.05 Release (June '05)</p> <p>RQ6150 - Implemented in the 4.5.03 Release</p> <p>RQ6151- Scheduled to be in the 4.5.04 Release (May '05)</p> <p>RQ6152 - Implemented in the 4.5.03 Release</p> <p>RQ6003 - Scheduled to be in the 4.5.05 Release (June '05)</p>
55	BellSouth did not calculate remedy payments for M&R-2 according to the SEEM Administrative Plan.	BellSouth issued the following RQs to correct the issue: RQ6148, RQ6149, RQ6150, RQ6151, RQ6152, RQ6003, and RQ6040. The information contained in the description of the RQs was insufficient for Liberty to determine whether they would resolve the issues noted in this Finding.	Agree		<p>RQ6148 - Implemented in the 4.5.03 Release</p> <p>RQ6149- Scheduled to be in the 4.5.05 Release (June '05)</p> <p>RQ6150 - Implemented in the 4.5.03 Release</p> <p>RQ6151- Scheduled to be in the 4.5.04 Release (May '05)</p> <p>RQ6152 - Implemented in the 4.5.03 Release</p> <p>RQ6003 - Scheduled to be in the 4.5.05 Release (June '05)</p> <p>RQ6040 - Scheduled to be in the 4.5.05 Release (June '05)</p>
56	BellSouth did not have adequate and consistent documentation for its SEEM remedy payment calculation process, which may have contributed to erroneous calculations.	Liberty recommend that BellSouth consider improving its documentation, including, but not restricted to, the creation of a Florida SEEM Replication Manual incorporating some of the improvements BellSouth has noted in its response to this Finding.	Disagree	BellSouth disagrees with the extent of documentation that Liberty believes should be developed. BellSouth agrees that some improvement is needed in the existing documentation.	BellSouth will develop a SEEM Replication Manual based on the new adopted Florida SEEM Administrative Plan.
57	BellSouth improperly excluded some data items and improperly included others in the calculation of SEEM remedy payments for the O-9 measure.	Liberty believes BellSouth's changes should correct the problems, but has not checked any actual code for the changes.	Agree		<p>RQ5631- Implemented in the 4.4.06 Release</p> <p>RQ4932 - Implemented in the 4.4.02 Release</p> <p>RQ5087- Implemented in the 4.4.04 Release</p>

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Finding	Description	Liberty's Recommendation	Agree/Disagree	BellSouth' Position	BellSouth' Course of Action
58	The BellSouth CLEC Administration table update process caused delayed penalty payments to CLECs.	BellSouth should reexamine its process to determine whether there are ways to assure timely rendering of remedy payments.	Disagree	BellSouth disagrees that our process caused delayed payments. However, we agree with Liberty's recommendation.	BellSouth will reexamine the process for additional improvements.
59	BellSouth does not have a process in place to ensure that all remedies for a given month are eventually paid.	Liberty acknowledges BellSouth's statement that they have introduced process improvements since the time of the Audit, and that these may address the issue in this Finding. However, Liberty has insufficient information to assess whether that is the case.	Agree	Process improvements have been implemented since the timeframe of the Audit to facilitate the actual balance procedures between PARIS and STAR systems.	Process improvements have been implemented since the time frame of the audit to facilitate the actual balance procedures between PARIS and STAR, therefore BellSouth maintains that no further action is required