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June 23, 2005

**BY ELECTRONIC FILING**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Attached please find the CLEC Coalition's Comments Regarding Liberty Consulting Group's Audit of BellSouth's Performance Assessment Plan to be filed in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

*s/ Tracy W. Hatch*

Tracy W. Hatch

TWH/scd  
Attachment  
cc: Parties of Record

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the CLEC's Reply was served by electronic and U.S. Mail this 23rd day of June 2005 to the following:

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*s/ Tracy W. Hatch*  

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*Tracy W. Hatch*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: )  
 )  
Performance Measurements ) Docket No.: 000121A-TP  
For Telecommunications )  
Interconnection, Unbundling ) Filed: June 23, 2005  
And Resale )

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**CLEC COALITION COMMENTS  
REGARDING LIBERTY CONSULTING GROUP'S AUDIT OF BELL SOUTH'S  
PERFORMANCE ASSESSMENT PLAN FOR FLORIDA**

Pursuant to Florida Public Service Commission ("FPSC") Staff memo dated May 26, 2005, the CLEC Coalition consisting of ACCESS Integrated Networks Inc. ("AIN"), AT&T Communications of the Southern States, LLC ("AT&T"), MCI metro Access Transmission Services, LLC ("MCI"), DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom/BTI"), NewSouth Communications, Corp., and Nuvox Communications Inc. hereby files its comments regarding Liberty Consulting's findings and recommendations resulting from its audit of BellSouth's Florida Performance Assessment Plan. These comments are based on information received from Liberty Consulting's Final Audit Report dated April 19, 2005, BellSouth's response to the Final Report dated May 10, 2005, the workshop conducted by the Florida Public Service Commission Staff on June 8, 2005, and a conference call conducted by Staff on June 15, 2005.

CLEC Coalition comments are provided, by finding number, in a table included as Attachment 1. The findings are organized into the following categories:

1. Findings for which issued/implemented RQs have the potential to resolve the issue. (24)
2. PMAP Changes, Notification, and Reposting Issues (6)
3. SEEM Issues (6)
4. SQM Report/Documentation Issues (12)
5. Other SQM Issues (10)
6. Other Audit Issues (1)

In addition to comments included in the attached table, the CLEC Coalition offers, by category, the following information for several of the categories of its comments.

Category 1: Findings with RQs that Potentially Resolve the Issue

This category contains findings for which RQs (change requests) have been issued or implemented which have the potential to resolve the issues noted in the finding. Often, but not always, Liberty opines that, if properly implemented, the RQ(s) should resolve the issue. However, many RQs had not been implemented at the time of Liberty's report, and even for those that had, it was not in Liberty's scope of work to determine whether the issues had been resolved. Consequently, there is a need to verify that these RQs have been implemented in ways that resolve the issues detected in the audit findings.

For eight of the twenty-four findings (Findings 52, 20, 32, 43, 45, 4, 7, and 10) included in this category, CLECs believe an affidavit and the accompanying analysis

described in the attached table may be sufficient (although Finding 43 raises additional issues that we address in our comments on findings 8 and 38). However, for fourteen of the findings (Findings 21, 25, 53, 57, 23, 27, 28, 30, 33, 35, 37, 40, 42, and 3), the CLEC Coalition is sufficiently concerned about the impact of the problem, so much so, that it also recommends BellSouth be required to report its reposting and SEEM recalculation actions related to the issues in the finding.<sup>1</sup> For example, in Finding 21, Liberty stated, “However, given the large percentage of hot cut service orders not included in the reported results, Liberty believes the effect was likely to be significant.” (See lines 21 and 22 of page 149 of Final Audit Report.) Liberty drew similar conclusions in finding 25. (See lines 17 and 18 of page 153 of Final Audit Report.)

Further, due to the complexity and significance of the issues in two findings (Findings 54 and 55), CLECs believe that affidavits are insufficient and thus a re-audit is necessary. These findings differ because Liberty was not in a position to isolate the causes of the problems that it encountered. Across findings 52, 54, and 55, Liberty uncovered at least four errors in BellSouth’s parity test calculation procedures, resulting in seven distinct RQs. Because of the interdependence among the steps of these calculations, it was impossible for Liberty to verify that it had even identified the complete list of problems causing findings 54 and 55, much less that BellSouth’s RQs would resolve the issues. In particular, even though Liberty concludes Finding 54 with the statement, “Liberty believes that if these changes are properly implemented, the issues will be resolved,” that cannot be the case because there were still 71 Z-score differences remaining after Liberty’s best attempts to reconcile its calculations with BellSouth’s erroneous ones.

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<sup>1</sup> For finding 43, the issue of reposting and recalculation was addressed in the Final Report.

Given the critical importance of the calculations addressed in findings 54 and 55, the accuracy and completeness of BellSouth's changes must be validated. However, without a definitive list of the problems, the only way to verify that they have been resolved is to replicate BellSouth's new calculations. Therefore, the CLEC Coalition recommends that Liberty be commissioned to conduct a limited re-audit to replicate and validate the Z-score and balancing critical value calculations previously found in error (on new data months if necessary).

#### Category 2: PMAP Changes, Notification, and Reposting Issues

This category includes findings related to PMAP change management, CLEC and FPSC notification of changes, and reposting issues. The Coalition believes that the problems identified by Liberty in these areas are of critical importance—especially as we move towards major revisions of the SQM and SEEM plans. While the CLEC Coalition was able to provide comments and recommendations for most of the findings, lack of sufficient information about BellSouth's internal processes sometimes hindered providing a more thorough and comprehensive response. Therefore, the CLEC Coalition recommends creation of an industry/FPSC task force to examine and enhance current BellSouth practices and procedures for PMAP changes and notification. The goals of the task force would be to insure that CLECs and the FPSC are fully informed of changes and that the reposting policy is implemented accurately and consistently. The CLEC Coalition believes that such a task force may well yield additional solutions for these important issues.

### Category 3: SEEM Issues

Category 3 addresses SEEM issues not included in other categories of these Comments. The CLEC Coalition is very concerned with the inadequacy of detailed SEEM documentation, as addressed by findings 11 and 56. As noted in Finding 56, the lack of a SEEM Replication Manual for Florida may have been a contributing factor towards the large number of errors in the SEEM implementation. Note that this documentation failure also makes it nearly impossible for CLECs and Staff to monitor the implementation of SEEM, a factor that may have contributed to so many errors surviving until this audit. Finally, a complete and accurate SEEM Replication Manual would be a very valuable tool to anyone auditing SEEM implementation in the future. Consequently, the CLEC Coalition recommends that BellSouth be required to develop and publish within three months of the implementation of a revised SQM and SEEM plan, a SEEM Replication Manual to be used by both CLECs and the Florida Commission.

The CLEC Coalition is also extremely concerned with finding 36, which appears to indicate that BellSouth unilaterally decided to exclude UNE-P dispatch from three SEEM measures and requests that the FPSC require that BellSouth provide to CLECs and the FPSC any unpaid remedies caused by this inappropriate omission from the SEEM plan.

### Category 5: Other SQM Issues

Two of the ten findings in this category are of special concern to the CLEC Coalition. First, finding 31 indicates that BellSouth is including hundreds of thousands



of disconnect (denial of service) orders in three provisioning measures, even though the business rules for these measures call for disconnect orders to be excluded. The CLEC Coalition shares Liberty Consulting's concern that the impact of this defect is likely significant. (Lines 5-7, page 166 of the Final Report). We recommend that the FPSC direct BellSouth to immediately begin excluding denial service orders from measures P-3, P-4, and P-9.

Second, Finding 16 describes the exclusion—due to missing data values—of hundreds of thousands of service orders beyond those permitted by the SQM. Although Liberty addresses the exclusion of service orders for measures for which the missing values are unnecessary, we are equally concerned about the impact of missing data for those measures that do require valid data values. This situation can only result in inaccurate reports. The CLEC Coalition recommends that the FPSC require BellSouth to conduct the analysis necessary to determine the reasons for inappropriately excluding service orders and take corrective action.

#### Category 6: Other Issues

Finding 15 addresses deficiencies in BellSouth's Performance Measurements Quality Assurance Plan (PMQAP). The PMQAP documents the procedures BellSouth uses to ensure that it produces accurate and reliable service quality measurement reports. Despite the critical nature of this document, Liberty found that "the poor organization and high level nature of most of the PMQAP documentation can hamper effective implementation of the processes. In addition, Liberty notes that assessment of compliance with PMQAP was one of the requirements of this audit, and the shortcomings

noted in this finding *limit the ability* to assess such compliance.” (emphasis added)  
(Lines 26-32 on page 56 of the Final Report)

The CLEC Coalition is very concerned with this finding and recommends that BellSouth be required to correct the deficiencies noted in this finding and provide a copy of the updated PMQAP to the FPSC Staff for review. Additionally, given the inadequate state of the PMQAP and the numerous significant issues uncovered by this audit, we also recommend that the FPSC require that another third party audit be conducted as soon as practical after implementation of the next updated version of the SQM and SEEM plans.

### Conclusion

The CLEC Coalition appreciates the opportunity to provide comments regarding the audit findings and recommendations. We look forward to continuing to work with the FPSC to resolve these important issues.

Respectfully submitted this 23rd day of June, 2005.

### CLEC COALITION

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**Category 1 Findings for which RQs have been issued/implemented which have potential to resolve issue**

Liberty Classification /Finding #	Audit Finding	CLEC Comments
1/21	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	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 21 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted in Florida and SEEM recalculated, and the results of those actions.
1/25	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.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 25 have been corrected. The affidavit should include a description of the analysis conducted and the findings of the analysis. BellSouth should provide a report which describes whether this data was reposted in Florida and SEEM recalculated, and the results of those actions.
1/52	BellSouth was not calculating the parity measures involving Tier I averages according to the SEEM Administrative Plan.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 52 have been corrected. The affidavit should include a description of the analysis conducted and the findings of the analysis.

1/53	BellSouth did not make remedy payments for failures associated with the O-3 and O-4 (Percent Flow-Through Service Requests Summary and Detail) measures in accordance with the SEEM Administrative Plan.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 53 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted in Florida and SEEM recalculated, and the results of those actions.
1/54	BellSouth did not calculate the remedy payments for percentage parity measures (i.e., M&R-1, M&R-4, M&R-5, P-3, and P-9) according to the SEEM Administrative Plan.	Due to the complexity and significance of the issues raised in this finding, CLECs recommend that Liberty re-audit these issues and file a report with the Commission.
1/55	BellSouth did not calculate remedy payments for M&R-2 (Customer Trouble Report Rate) according to the SEEM Administrative Plan.	Due to the complexity and significance of the issues raised in this finding, CLECs recommend that Liberty re-audit these issues and file a report with the Commission.
1/57	BellSouth improperly excluded some data items and improperly included others in the calculation of SEEM remedy payments for the O-9 (Firm Order Confirmation Timeliness) measure.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 57 have been corrected. The affidavit should include a description of the analysis conducted and the results of the analysis. BellSouth to report whether it made adjustments to SEEM payments as a result of these errors.
2/20	BellSouth omits coin orders from O-3 and O-4 (Percent Flow-Through Service Requests, Summary and Detail) reported results.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 20 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis.

<p>2/23</p>	<p>BellSouth was misclassifying certain orders with a "PR-17" (cancelled order) error code thereby incorrectly excluding these orders from the calculation of the P-3 (Percent Missed Initial Installation Appointments) results.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 23 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted in Florida and SEEM recalculated, and the results of those actions.</p>
<p>2/27</p>	<p>BellSouth incorrectly included certain record change orders in the calculation of P-3, P-4, and P-9 measurement results.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 27 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions.</p>
<p>2/28</p>	<p>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.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 28 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions.</p>

<p>2/30</p>	<p>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.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 30 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions. Further, the CLECs recommend that Liberty's recommendation that BellSouth exclude orders cancelled after the due data with a null value in the missed appointments code field be implemented. (In its comments, BellSouth indicated that it and Liberty had reached consensus on this finding)</p>
<p>2/32</p>	<p>BellSouth overstated the CLEC circuit counts for P-7C (Hot Cut Conversions - Percent Provisioning Troubles Received within 7 Days of a Completed Service Order) by doubling the SL1 (Non-Design) Loop volume.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 32 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis.</p>
<p>2/33</p>	<p>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, P-4, and P-9 measures</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 33 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions.</p>
<p>2/35</p>	<p>BellSouth did not include certain wholesale products in its calculation of the SEEM remedy payments for the P-9 (Percent Provisioning Troubles within 30</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 35 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the</p>

	Days of Service Order Completion) measure.	analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions.
2/37	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.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 37 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions.
2/40	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.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 40 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions.
2/42	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.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 42 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted and SEEM recalculated, and the results of those actions.



2/43	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 reposting was necessary.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 43 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. CLECs are extremely concerned regarding Liberty's findings regarding re-posting and will address further in response to findings 8, 12, and 13.
2/45	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, M&R-2, M&R-3, M&R-4, and M&R-5 measures.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 45 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis.
3/3	For measure CM-8 (Percent Change Requests Rejected), BellSouth was not reporting according to the SQM Plan reporting requirements.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 3 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis. BellSouth should provide a report which describes whether this data was reposted for Florida and SEEM recalculated, and the results of those actions.
4/4	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.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 4 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis.
4/7	BellSouth posts only the most recent month of PARIS reports for viewing by the CLECs on the PMAP website.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 7 have been corrected. The affidavit should include a description of the analysis

	<p>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.</p>	<p>conducted to ensure the problem was corrected and the results of the analysis.                  CLECS recommend that 12 months of PARIS reports be provided as is the current practice with SQM reports.                  (CLECs note that BellSouth's "Course of Action" indicated that the RQs associated with this finding have been implemented; however, CLECs could not find reports on PMAP website.)</p>
<p>4/10</p>	<p>The SQL scripts contained in the SDUM document for M&amp;R-2 (Customer Trouble Report Rate) did not replicate CLEC results properly.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 10 have been corrected. The affidavit should include a description of the analysis conducted to ensure the problem was corrected and the results of the analysis.</p>

**Category 2 PMAP Changes, Notification and Reposting Issues**

Liberty Class /Finding #	Audit Finding	CLEC Comments
2/38	BellSouth neglected to calculate the total impact of multiple errors in determining whether it needed to repost the results for the P-7C measure.	<p>CLECs do not believe that the current reposting policy indicates that BellSouth should consider only individual errors in determining whether to repost results. As Liberty states, "Unless BellSouth calculated the combined effect of the three problems, identified in its change control, it cannot accurately state that a reposting is not necessary under the reposting guidelines." Although CLECs agree with BellSouth that coordinating multiple changes could be arbitrary and complicated, combining all errors that are detected in the same month appears to be relatively straight-forward and should be easy to implement. Additionally, CLECs believe that the problems with multiple errors noted by this finding can be mitigated through implementation of recommendations associated with other findings. For example, improving the notifications and impact statements as addressed in finding 12 and prompt issuance (after detection) and prompt implementation of RQs (finding 13)</p> <p>CLECs also note that a task force to examine current BellSouth practices and procedures for PMAP changes and notification may well yield other solutions for this important issue.</p>
3/8	BellSouth has provided no evidence that it complied with the Florida Reposting Policy in determining whether errors or changes required reposting.	<p>CLECs recommend that BellSouth be required to provide evidence to the FPSC Staff that it retains (in an auditable format) documentation of the analysis it performs to determine whether reposting was required, and that this documentation be retained for 18 months. The CLECs support Liberty's recommendations on lines 29-35 on page 47 of the Final Report to review BellSouth's implementation of the reposting policy.</p> <p>CLECs recommend that BellSouth provide the FPSC Staff the revised</p>

<p>Reposting Procedures for review (See BellSouth Course of Action for this finding)</p> <p>CLECs also note that a task force to examine current BellSouth practices and procedures for PMAP changes and notification may well yield other solutions for this important issue.</p> <p>CLECs strongly support most of the enhancements to the impact statements and PMAP change notifications recommended in this finding. However, CLECs are concerned about “the use of a minimum of three months of most recent data” –the impact on the reposting policy would have to be evaluated.</p> <p>CLECs further recommend that impacts be calculated and reported relative to their impact on the affected measure. (See “Determination of when Reposting Policy Applies” in Appendix D of proposed SQM and also lines 16-18 on page 52 of final audit report)</p> <p>CLECs also note that a task force to examine current BellSouth practices and procedures for PMAP changes and notification may well yield other solutions for this important issue.</p>	
<p>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.</p> <p>CLECs also note that a task force to examine current BellSouth practices and procedures for PMAP changes and notification may well yield other solutions for this important issue.</p> <p>Those RQs (or combination of RQs) that require reposting and recalculation of SEEM payments should be given top priority for implementation. This is especially critical as BellSouth makes recalculated SEEM payments for three months in <b>arrears</b> from the date of detection, but not from detection date forward until problem correction.</p> <p>CLECs also note that a task force to examine current BellSouth practices and procedures for PMAP changes and notification may well yield other solutions for this important issue.</p>	<p>3/12</p> <p>The overall interval to process BellSouth's Change Requests was excessive.</p>
<p>CLECs are concerned with the implications of this finding, as the deficiencies noted here may well contribute to other trouble areas such as the excessive intervals described in finding 13. However, CLECs have</p>	<p>3/13</p> <p>3/14</p>

	<p>BellSouth management to accurately monitor workflows to determine which process areas are in need of improvement.</p>	<p>insufficient information about BellSouth's change control process to make specific recommendations.</p> <p>CLECs also note that a task force to examine current BellSouth practices and procedures for PMAP changes and notification may well yield other solutions for this important issue.</p>
<p>3/50</p>	<p>The BellSouth PMAP production validation process did not update the historical data used in trending analysis to reflect the effect of PMAP system changes.</p>	<p>CLECs note that the finding indicates that BellSouth relies heavily on trend analysis in its PMAP production validation process. It also states that BellSouth did not update the historical data used in the trending analysis to reflect the effect of PMAP system changes. This certainly appears to be cause for concern, but CLECs have insufficient information with which to validate or refute BellSouth's claim "that its overall validation process accommodates assessing the impact of changes to the PMAP system".</p>

**Category 3 SEEM Issues**

Liberty Class /Finding #	Audit Finding	CLEC Comments
2/56	BellSouth did not have adequate and consistent documentation for its SEEM remedy payment calculation process, which may have contributed to erroneous calculations.	<p>CLECs recommend that BellSouth be required to publish to CLECs and the Florida PSC a PARIS/SEEM replication manual within 3 months of implementation of a revised SQM and SEEM. This manual should be suitable for use by:</p> <ul style="list-style-type: none"> <li>--BellSouth</li> <li>--Florida PSC Staff</li> <li>--CLECs</li> <li>--Third party auditors</li> </ul> <p>A copy of the manual should be filed in this docket for Staff and CLEC review for completeness and adequacy.</p>
3/11	BellSouth did not provide adequate documentation for replication of the results reported in PARIS.	<p>CLECs recommend that BellSouth be required to publish to CLECs and the Florida PSC a PARIS/SEEM replication manual within 3 months of implementation of a revised SQM and SEEM. This manual should be suitable for use by:</p> <ul style="list-style-type: none"> <li>--BellSouth</li> <li>--Florida PSC Staff</li> <li>--CLECs</li> <li>--Third party auditors</li> </ul> <p>A copy of the manual should be filed in this docket for Staff and CLEC review for completeness and adequacy.</p>
3/58	The BellSouth CLEC Administration table update process caused delayed penalty payments to CLECs.	<p>CLECs recommend that BellSouth provide a quarterly report to the Commission Staff which details the number of unpaid remedies and the affected CLECs, and actions planned by BellSouth to deliver the payments.</p>

<p>3/59</p>	<p>BellSouth does not have a process in place to ensure that all remedies for a given reporting month are eventually paid.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 59 have been corrected, and that BellSouth has a process in place which ensures that all remedies for a given reporting month are eventually paid. The affidavit should include a detailed description of the process.</p>
<p>4/51</p>	<p>BellSouth performed no validation to detect invalid zero dollar remedy payments during the audit period.</p>	<p>CLECs recommend that BellSouth file an affidavit in this docket affirming that the problems described in finding 51 have been corrected, and that BellSouth has implemented a process that consistently includes the examination of zero-dollar remedy payments across all of the SEEM measures.</p>
<p>4/36</p>	<p>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.</p>	<p>As an initial matter, CLECs question how this finding could be rated a severity 4 finding when a level of disaggregation was intentionally omitted from the SEEM plan.</p> <p>CLECs believe that BellSouth's "interpretation" that UNE-P dispatch should not be included in the SEEM plan is indefensible. It is ludicrous to suggest, via this interpretation, that the FPSC intended to omit UNE-P dispatch from its remedy plan. See Florida Order PSC-01-1819-FOF-TP, dated September 10, 2001, Appendix 7 which clearly lists the disaggregation for SEEM UNE-P as dispatch out, and non-dispatch, which is further divided into dispatch-in and switch-based.</p> <p>CLECs strongly recommend that BellSouth be required to calculate SEEM and pay remedies, including interest, for all data in its possession for UNE-P dispatch performance results.</p>

**Category 4 SQM Plan/Report Documentation Issues**

Liberty Class /Finding #	Audit Finding	CLEC Comments
2/22	BellSouth did not include the translation time necessary to place the line back in full service when calculating the measure results for P-7 (Coordinated Customer Conversions Interval).	CLECs note that this business rule has been removed from the proposed SQM and believe its removal resolves this issue.
2/24	BellSouth reported the results for P-3 (Percent Missed Initial Installation Appointments) incorrectly because it included end-user-caused misses in the denominator.	CLECs note that the proposed SQM resolves this issue.
2/26	BellSouth did not include disconnect service orders associated with Standalone LNP activity in the measure calculation for P-4 (Average Completion Interval & Order Completion Interval Distribution).	CLECs note that the proposed SQM removes the requirement that these orders be included and thus resolves this issue.
2/41	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.	CLECs note that implementation of the proposed SQM will resolve this issue.
2/46	For the B-1 (Invoice Accuracy) measure, BellSouth did not define the adjustments it includes in a report month consistently	CLECs accept BellSouth's offer to provide clarifying language in the SQM that CRIS/IBS adjustments are based on all adjustments posted to an account during the reporting month, and that CABS adjustments are



	for all bills.	based on adjustments issued on the customer's bill.
3/2	BellSouth was not reporting C- 1 (Collocation Average Response Time) results according to the SQM Plan reporting requirements.	BellSouth should modify its reports to include the six levels of disaggregation required by the current and proposed SQM.
3/9	The SDUM instructions for replicating the SQM/SRS reports were not easy to understand and use.	CLECs do not require that BellSouth make changes to the SDUM at this time, but do recommend that the FPSC direct BellSouth make necessary changes, should CLEC(s) raise issues in the future with the usability of the manual.
4/5	The Florida SQM Plan and SEEM Administrative Plan contain several discrepancies regarding provisions found in Florida Order PSC-02- 1736-PAA-TP.	CLECs note that implementation of the proposed SQM (and SEEM) will resolve this issue.
4/6	For measure OSS-2 (OSS Availability - Pre-Ordering/Ordering), the availability report at BellSouth's Interconnection website is missing entries for many of the OSS listed in Appendix D of the SQM Plan.	In its "Course of Action", BellSouth proposes to correct the web-site when it implements Appendix C of the proposed SQM. CLECs can support this recommendation.
4/19	BellSouth has adopted a convention for treating related PONS in O-9 (Firm Order Confirmation Timeliness) that is not contained in the SQM Plan.	CLECs believe no further action is required.
4/39	BellSouth's documentation in the SQM Plan for the P-7C (Hot Cut Conversions - Percent Provisioning Troubles Received within 7 Days of a Completed Service Order) is contradictory and misleading.	CLECs note that implementation of the proposed SQM will resolve this issue.
4/49	BellSouth's methods for deriving revenues and determine which bills are included in the B-1 (Invoice Accuracy) measure are not addressed by the SQM	CLECs recommend that 1) BellSouth file a report in this docket which clearly defines which revenues it currently excludes and why. 2) The FPSC convene a workshop to discuss BellSouth's report.

	Plan.	3) The FPSC Staff determine next steps at conclusion of workshop.
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**Category 5 Other SQM Issues**

Liberty Class /Finding #	Audit Finding	CLEC Comments
1/31	BellSouth incorrectly included deny and restore record change orders in the calculation of P-3, P-4, and P-9 measure results.	<p>CLECs believe that the orders resulting in disconnection of service should be excluded from these 3 measures, and that orders resulting in activation of service should be included in the measures. Therefore denials should be excluded and restorals should be included.</p> <p>CLECs take this position, because, regardless of the label or category, these orders have the same characteristics (Disconnection of or activation of service) as the other service orders currently excluded from or included in these 3 measures, i.e. a denial disconnects service, and a restoral activates service.</p> <p>CLECs note that the exclusions for these 3 measures in the proposed SQM have been modified (at the recommendation of BellSouth) from "D&amp;F Orders" to the more generic "Disconnect Orders".</p>
2/16	BellSouth excluded transactions from the calculation for a measure because it lacked required information about these transactions that were necessary only for another measure.	<p>The unnecessary exclusion of transactions raises two important concerns: (1) loss of information and, more important, (2) the potential for bias in parity comparisons.</p> <p>Regarding loss of information, Liberty reports that BellSouth excluded more than one million service orders from the performance results for provisioning measures each month, although it is unclear what proportion were excluded unnecessarily. While unnecessary exclusions may represent a small fraction of all records processed by BellSouth each month, they may still constitute a substantial fraction of records for certain sub measures.</p>

	<p>Regarding potential bias in parity comparisons, the fact that ILEC and CLEC transactions are treated the same does not guarantee that there is no "parity issue." The circumstances to produce missing data that exclude transactions may be much more (or less) prevalent for ILEC transactions than for CLEC transactions. If so, and if omitted transactions systematically differ in terms of the outcome, then bias in the parity comparison would result.</p> <p>Although The CLEC Coalition does not want to require BellSouth to undertake a great effort offering little benefit, we question whether including all available transactions would entail the massive effort that BellSouth suggests. As Liberty states, "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."</p> <p>Consequently, The CLEC Coalition supports Liberty's recommendation that BellSouth conduct a study to determine the number of transactions that were unnecessarily excluded from SQM and SEEM calculations for some measures. Because the prevalence of circumstances leading to exclusions may vary by sub measure, BellSouth should report findings separately by sub measure. Specifically, for each sub measure included in the study, BellSouth should report:</p> <ul style="list-style-type: none"> <li>o the number of CLEC transactions excluded unnecessarily,</li> <li>o the outcome (mean or proportion) for CLEC transactions excluded unnecessarily,</li> <li>o the number of CLEC transactions currently included,</li> <li>o the outcome (mean or proportion) for CLEC transactions currently included,</li> <li>o the number of ILEC transactions excluded unnecessarily,</li> </ul>
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	<p>o the outcome (mean or proportion) for ILEC transactions excluded unnecessarily,</p> <p>o the number of ILEC transactions currently included, and</p> <p>o the outcome (mean or proportion) for ILEC transactions currently included:</p> <p>Additionally, CLECs are gravely concerned with the potential impact of this finding on the accuracy of BellSouth's reported performance and strongly urge the Commission to require BellSouth to conduct the following additional study. As the report notes and was discussed in the FPSC workshop, BellSouth excludes over 1 million service orders (due to errors in the data) each month from the provisioning measures alone. The CLECs request the FPSC require BellSouth to conduct and analysis and create an action plan for reducing the number of orders which are eliminated from measurement due to errors. In the alternative, BellSouth should count such errors as a failure of the metric to create an incentive to correct the causes of the errors.</p>	
2/18	<p>According to BellSouth, CLECs cannot order INP service in Florida. BellSouth should therefore correct the data processing problem which classifies certain service orders as INP and then excludes them from the data.</p> <p>CLECs recommend that BellSouth file an affidavit in this docket affirming that this correction has occurred and the problems described in finding 18 have been corrected.</p> <p>CLECs note that the current SQM has disaggregation for INP, which should never have data. The proposed SQM, when implemented, has no INP level of disaggregation.</p>	<p>BellSouth incorrectly reported certain LNP orders as INP Standalone orders in the O-9 (Firm Order Confirmation Timeliness, and P-9 (Percent Provisioning Troubles within 30 Days) results.</p>
2/29	<p>CLECs believe that data errors resulting in a zero duration should be excluded from the calculation. (CLECs note that in lines 23-25 on page 156 of Final Report, "BellSouth was unable to provide a concrete explanation of this problem, although it did indicate that the problem was</p>	<p>BellSouth included orders with invalid conversion durations in the calculation of the P-7 (Coordinated Customer Conversions Interval) measure.</p>

		likely the result of input errors when the record was created.”)
		If BellSouth contends that very short intervals, but greater than zero, reflect actual performance, it should include documentation in an affidavit in this docket and continue to include these transactions in the reported results.
2/44	BellSouth included orders with invalid maintenance durations in the calculation of the M&R-3 (Maintenance Average Duration) measure	CLECs believe that data errors resulting in a zero duration should be excluded from the calculation. (In lines 32-38 of page 175 of the Final Report, Liberty concludes the invalid durations appear to be data errors.) Excluding durations of zero minutes was one of the three possible solutions recommended by Liberty.
3/47	BellSouth’s manual process for preparing billing data for the B-1 (Invoice Accuracy) measure did not contain adequate quality control procedures.	BellSouth should provide a copy of its revised work flows and job aids to FPSC Staff for review.
3/34	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.	CLECs recommend that BellSouth file an affidavit in this docket affirming that the UNE-Loops classified as switch-based in the data are rolled-up and reported as non-dispatch in SQM and SEEM reports.
3/48	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.	CLECs recommend that BellSouth file an affidavit in this docket that: <ol style="list-style-type: none"> <li>1) Describes the mechanical enhancements made in 2<sup>nd</sup> quarter 2004 to reduce the manual handling of adjustments.</li> <li>2) Quantifies what %, by CLEC and Retail, are currently mechanized vs. manual</li> <li>3) Describes in more detail and with better clarity (than lines 28-34 of page 179 of the Final Report) how it manually determines exclusions from adjustments from retail adjustment figures.</li> <li>4) After reviewing the information above, CLECs will provide further</li> </ol>

		comments.
4/1	BellSouth was not reporting B-10 (Percent Billing Errors Corrected in "X" Business Days) according to the SQM Plan Reporting Requirements.	CLECs recommend that BellSouth make a programming change to include total of all types of billed services as required by the current and proposed SQM. CLECs also support the recommendations of Liberty and BellSouth to maintain the current disaggregation levels of resale, interconnection and UNE.
4/17	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.	<p>CLECs are concerned that BellSouth appears to be using a retail analog that compares what it does for one group of competitors (long distance and wireless) to another (local service providers) to determine parity. It should be looking at the trunks it adds to prevent blocking or expand calling areas for its end user customers.</p> <p>While using these as a retail comparison for most of the maintenance measures except those covering repair intervals is tolerable, using these as retail analogs for provisioning and service restoral speeds only shows that it's not treating one group of competitors worse than the others.</p> <p>CLECs recommend that BellSouth establish another set of retail analogs that truly capture what it does for its end users' capacity needs versus CLEC customers.</p>

**Category 6 Other Audit Issues**

4/15	BellSouth has not documented well its Performance Measurements Quality Assurance Plan.	CLECs recommend that BellSouth be required to correct the deficiencies noted in this finding and provide a copy of the updated PMQAP to the Florida PSC Staff for review. CLECs also recommend that the FPSC direct another third party audit be conducted as soon as practical after implementation of the next updated version of SQM and SEEM plans.
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Finding/Category Cross Reference

Finding	Category	Finding	Category	Finding	Category	Finding	Category	Finding	Category
1	5	16	5	31	5	46	4		
2	4	17	5	32	1	47	5		
3	1	18	5	33	1	48	5		
4	1	19	4	34	5	49	4		
5	4	20	1	35	1	50	2		
6	4	21	1	36	3	51	3		
7	1	22	4	37	1	52	1		
8	2	23	1	38	2	53	1		
9	4	24	4	39	4	54	1		
10	1	25	1	40	1	55	1		
11	3	26	4	41	4	56	3		
12	2	27	1	42	1	57	1		
13	2	28	1	43	1	58	3		
14	2	29	5	44	5	59	3		
15	6	30	1	45	1				