ORIGINAL

Matilda Sanders

From: Smith, Debbie N. [Debbie.N.Smith@BellSouth.COM]
Sent: Friday, September 15, 2006 12:01 PM
To: Filings@psc.state.fl.us
Cc: Fatool, Vicki; Slaughter, Brenda ; Barclay, Lynn; Nancy Sims; Holland, Robyn P; Randa, Johna A; Bixler, Micheale; Culpepper, Robert
Subject: Florida Docket No. 000121A-TP
Importance: High
Attachments: actionitems.pdf

CMP ____
COM ____
CTR ____
ECR ____
GCL ____
OPC ____
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SEC 1
OTH ____

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B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Incumbent Local Exchange Telecommunications Companies.

C. BellSouth Telecommunications, Inc.
on behalf of Robert A. Culpepper

D. 26 pages total in PDF format

E. BellSouth Telecommunications, Inc.'s Responses to Staff's First Set of Action Items.

Debbie Smith (sent on behalf of Robert A. Culpepper)
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ORIGINAL

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September 15, 2006

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 is BellSouth Telecommunications, Inc.'s Responses to Staff's First Set of Action Items. A copy of the same is being provided to all parties of record.

Sincerely,

Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix
James Meza, III

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 15th day of September, 2006 to the following:

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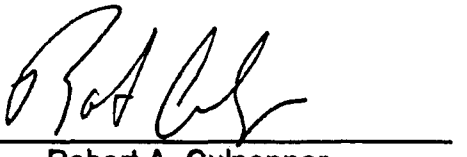


Robert A. Culpepper

(+) Signed Protective Agreement

#502166

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to August 22, 2006
Workshop Action Items
September 15, 2006
Item No. 1

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for OSS-1 if the proposed exclusion regarding timeouts was adopted. The exclusion should be applied to at least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: A response to this action item will be provided by September 29, 2006, the due date for the second set of action items. BellSouth will provide the response earlier if possible.

REQUEST: What system or systems are the CLECs directed to use for reporting Design Troubles? What is the system flow for design troubles. (OSS-1)

RESPONSE: CLECs use the Electronic Communications Trouble Administration (ECTA) and Circuit Provisioning Status System-Trouble Administration (CPSS-TA) interfaces to electronically submit troubles on design circuits into the Work Force Administration (WFA) system. CLECs may also manually submit designed circuit trouble reports by calling BellSouth's Customer Wholesale Interconnection Network Service Center (CWINS).

As a point of distinction, CLECs may use TAFI for non-design troubles. TAFI functionality provides problem determination and resolution by querying backend BellSouth legacy systems such as CRIS, DLR, MARCH, SOCS, etc., depending on the information needed to diagnose the problem. If TAFI is unable to resolve the trouble, TAFI submits a trouble report to the Loop Maintenance Operations System (LMOS). LMOS is the system used by field technicians, WMCs, etc. to complete the maintenance effort for non-design circuits. The response times for these queries to the backend legacy systems via TAFI are compared to retail response times to determine the measurement results for OSS-1. See Appendix C, page 84 of the current SQM.

Unlike TAFI, however, when CLECs submit design troubles through either ECTA or CPSS-TA, these systems do not provide functionality for problem determination and isolation. Instead, these systems are merely front-end applications to submit the designed circuit trouble to the WFA system. WFA is the equivalent system for designed circuits as LMOS is for non-design. Thus, WFA is used by field technicians, WMC, etc. to complete the maintenance effort for designed circuits. Also, it is critical to note that the BellSouth retail units do not use ECTA or CPSS-TA. So, there is no retail analog to ECTA and CPSS-TA. On the retail side, design troubles are entered directly into WFA. Thus, for purposes of OSS-1 there are no response intervals to compare.

Attachment 1 provides the system flow for design troubles

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for OSS-1 if the proposed change in calculations for M&R Response Interval were adopted. The proposed calculation should be applied to a least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: A response to this action item will be provided by September 29, 2006, the due date for the second set of action items. BellSouth will provide the response earlier if possible.

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for O-8 if the change in the standards were adopted. The proposed standards should be applied to a least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: A response to this action item will be provided by September 29, 2006, the due date for the second set of action items. BellSouth will provide the response earlier if possible.

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for O-9 if the change in the standard was adopted. The proposed standard should be applied to a least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: A response to this action item will be provided by September 29, 2006, the due date for the second set of action items. BellSouth will provide the response earlier if possible.

REQUEST: Please provide an analysis of the impact to SQM and SEEM data for O-11 if the change in the standards were adopted. The proposed standards should be applied to a least six months of historical SQM and SEEM data, and include the impact to Tier1 and 2.

RESPONSE: As an initial matter, it is important to point out that while the CLECs propose a 3% increase in the current benchmark, this actually represents a 60% increase in required performance improvement. The SQM aggregate results (October 2005 – July 2006) for the measure Firm Order Confirmation and Reject Response Completeness (O-11) are provided below based on the CLECs' proposed change in the benchmark from 95% to 98% for Fully Mechanized responses.

FL	Oct-05	Fully Mechanized	98%	73178	73228	99.93 %	YES
FL	Nov-05	Fully Mechanized	98%	93307	94421	98.82 %	YES
FL	Dec-05	Fully Mechanized	98%	85396	85518	99.86 %	YES
FL	Jan-06	Fully Mechanized	98%	101346	101409	99.94 %	YES
FL	Feb-06	Fully Mechanized	98%	68970	69019	99.93 %	YES
FL	Mar-06	Fully Mechanized	98%	88577	89198	99.30 %	YES
FL	Apr-06	Fully Mechanized	98%	75235	75305	99.91 %	YES
FL	May-06	Fully Mechanized	98%	102603	102706	99.90 %	YES
FL	Jun-06	Fully Mechanized	98%	68543	68659	99.83 %	YES
FL	Jul-06	Fully Mechanized	98%	59055	59098	99.93 %	YES

It should be noted that while BellSouth would have met the 98% benchmark at the aggregate CLEC level during this period, BellSouth would have missed the benchmark in several instances at the individual CLEC level. This is reflected by the fact that Tier 1 remedies are triggered, as provided below. Further, the fact that BellSouth exceeds the current benchmark in the aggregate is not the correct basis for raising a benchmark. The benchmark standard should be based on the minimum standard that affords an efficient carrier a meaningful opportunity to compete. The CLECs have not demonstrated that the current standard fails to meet that obligation.

Additionally, with such a stringent benchmark, all it takes is one small problem to generate penalties even though the problem is not systemic.

If the CLECs' proposed benchmark is adopted, Tier 1 SEEM remedies for the period January – June 2006, would have been as follows:

- January $0
- February $30
- March $10,620
- April $90
- May $1,080
- June $2,310

No Tier 2 penalties would have resulted.

REQUEST: a. Please provide an explanation of the business rules for O-12 and verify which calls from the universal center are included in this metric.

b. Is or can the ACD in the universal center be used to capture which calls are ordering and which are maintenance and repair.

RESPONSE: a. Currently, BellSouth is taking the data from the Universal Call Center (UCC) and using the ACD information to determine if it is a maintenance call. If it can be determined that the call is related to maintenance, it is excluded from measure O-12, Average Answer Time – Ordering Centers, and included in measure M&R-6. All other calls into the UCC are included in the Ordering measure, O-12. The Business Rules in the SQM reference a percentage of UCC calls applied to this measure, which is set at 20%. However, under the method described above, BellSouth must use the average answer time for all calls to UCC in order to calculate this metric. Consequently, using the method described above, instead of a set 20%, would have no impact on the reported results. Therefore, BellSouth proposes to remove the statement from the Business Rules that reads, "Twenty percent of these calls stem from ordering related activities and are reported in this measurement."

b. See response to part a.

REQUEST: Please verify whether jeopardies are provided on dispatch-in orders. (P-2A and P-2B)

RESPONSE: Dispatch-in orders do not receive jeopardy notices as defined by these measures. Measure P-2A is defined based on the need for jeopardy notices indicating that a committed due date is in jeopardy due to a facility delay, which is a dispatch-out order. One of the main reasons presented by the CLECs for needing to receive jeopardy notices was that on dispatch orders the customer needed someone onsite to provide access to the customer's premises. If the due date was in jeopardy, the CLECs would need to inform the customer as soon as possible so the customer could make contingency plans. No such coordination on the end user's premises is required for dispatch-in orders.

When a service order is issued in SOCS, a determination is made as part of the provisioning process whether a facility is available. If it is determined that a facility is not available for assignment, a jeopardy notice is sent to the CLEC either electronically if the LSR was received electronically, or by Fax if the LSR was received manually. However, for dispatch-in orders (i.e., orders that only require work in the central office) if a problem occurs that could cause the due date to be missed, this would not occur until very late in the service order completion process, usually on the due date. If the service order requires coordination, BellSouth would try to resolve the situation and if it appears that the problem may not be resolved prior to due date, the CWINS center would notify the CLEC of the problem. If, there is no coordination associated with the order, BellSouth would still do everything possible to meet the due date, and if unable to resolve the problem, this would be noted as a missed appointment (P-3, MIA).

In any event, for dispatch-in orders, BellSouth would generally not know 48 hours in advance that the due date is in jeopardy of being missed. Further, dispatch-in orders (orders requiring work in the central office only) rarely have issues that would cause a missed due date and designed circuits would be more likely than non-designed circuits to have problems, if any did occur.

To give a better perspective, based on the months of May through July, 2006, on all designed and coordinated non-designed orders, for all CLECS. The results are shown below:

- May - 1 order missed out of 9,399 orders; due to a CO assignment problem.
- June - 2 orders missed out of 5,641 orders; due to unavailable CO equipment
- July - 0 orders missed out of 8094 orders; due to unavailable CO Equipment/CO assignments

REQUEST: Please provide any audit findings which were the subject of section 2.5 of the SEEM Administrative Plan which necessitates the need for the proposed BellSouth change.

RESPONSE: The issue that BellSouth is attempting to rectify, by its proposed language change to section 2.5 actually stems from an interpretation issue that arose during the PwC audit with respect to the language in section 4.4.3 of the SEEM plan, which reads: "For each day after the due date that BellSouth fails to pay the Tier-2 Enforcement Mechanisms, BellSouth will pay the Commission an additional $1,000 per day." Specifically, the issue was whether this language should be construed to mean a Tier 2 payment made by the due date, but which is later found to be an underpayment, is subject a $1,000 per day penalty. BellSouth filed a letter with the Florida Commission on September 6, 2006 addressing this issue. Section 2.5 of the SEEM plan was not specifically addressed by the PwC audit, but the interpretation problem is the same for section 2.5 as for section 4.4.3. This is why Bellsouth proposed language to clarify the section 2.5 of the SEEM plan.

REQUEST: If determined appropriate, please provide the BellSouth amended proposal for 4.1.6.

RESPONSE: During the August 22, 2006 workshop, the CLECs expressed a concern with BellSouth's proposal to base the delta value on volume rather than the Tier 1 and Tier 2 separation. BellSouth's reason for proposing the change was that in prior workshops the different Tier 1 and Tier 2 values were used because CLECs volume for Tier 2 (aggregate volumes) tend to be larger than Tier 1 volume (individual CLEC data). However, the CLECs stated that materiality, and not volume, should be the primary basis for choosing the delta value. Therefore, BellSouth would recommend, as an amended proposal, that instead of using two different delta values for Tier 1 and Tier 2, there should be a single delta value of 1.0 regardless of Tier.

REQUEST: Please provide an analysis of the impact to SEEM metrics if the changes proposed by BellSouth in Section 4.1.6 were adopted. The proposed change should be applied to at least 6 months of historical SEEM data and include the impact to Tier 1 and 2.

RESPONSE: BellSouth believes that current SEEM payments are much larger than necessary and as a result has proposed a number of changes to address this concern. Attachment 2 provides some general examples of the extent to which these payments are overly punitive Several of the action items associated with this filing involve requests that BellSouth provide the impact to SEEM of implementing certain individual changes proposed by BellSouth. Therefore, BellSouth has provided the impact of implementing the changes referenced in these action items separately. However, the individual proposed changes are interrelated. Consequently, adding up the separate impacts of the individual proposed changes will overstate the actual combined impact.

In order to calculate an actual impact of the proposed change to Section 4.1.6, the coding in PARIS would have to be changed. For purposes of responding to this action item BellSouth has developed an approximate impact of making this change. For the six-month period from January – June 2006, the average monthly decrease in SEEM remedies would be about $11,300 for Tier 1 and about $9,600 for Tier 2. This change represents a decrease of less than 6% in overall SEEM remedies for this six-month period.

REQUEST: Please provide an analysis of the impact to SEEM metrics if the changes proposed by BellSouth in Section 4.3.1.2 were adopted. The proposed change should be applied to at least 6 months of historical SEEM data and include the impact to Tier 1 and 2.

RESPONSE: If the changes to section 4.3.1.2 of the SEEM plan proposed by BellSouth are applied to data for the six-month period from January – June 2006, the average monthly decrease in SEEM remedies would be about $68,150 for Tier 1 and $38,100 for Tier 2. This represents about a 29% decrease in total SEEM remedies for this period. See also the comments concerning the interrelated nature of individual BellSouth proposed SEEM changes in action item 11.

This change involves limiting SEEM consideration for retail analogs to those submetrics that have 30 or more transactions and only for cells that contain at least 5 transactions. So, the 29% figure above indicates the percent of total SEEM remedies that are generated by instances where there is not enough data to make a parity determination with any reasonable degree of certainty.

REQUEST: Please provide comments regarding the feasibility of using parity test results at the CLEC aggregate level, by sub-measure and disaggregating or allocating the aggregate affected volume to individual CLECs in place of proposed language for 4.3.1.2 regarding small sample sizes.

RESPONSE: BellSouth believes that this approach is very feasible. In fact, it solves some of the problems around parity determinations associated with small volumes. One possible approach to using CLEC aggregate level data, by sub-measure, to determine affected volumes for individual CLECs for Tier 1 remedies would be to start with the statewide CLEC aggregate data for the specific month involved. If the submetric test results in a failure at the aggregate level, the Total Affected Volumes (TAVs) for the submetric would be multiplied by the appropriate fee amounts from the Tier 1 fee schedule to derive an aggregate payout. This aggregate payout amount would be allocated only to those CLECs that experienced a failure. The amount received by the CLEC would be based on that CLEC's volume.

REQUEST: Please provide an analysis of the impact to SEEM metrics if the changes proposed by BellSouth in Section 4.3.1.4 were adopted. The proposed change should be applied to at least 6 months of historical SEEM data and include the impact to both Tier 1 and 2.

RESPONSE: Based on the SEEM data for the period January – June 2006, if BellSouth's proposed changes to the Section 4.3.1.4 were adopted, the average monthly decrease in SEEM remedies would be about $31,160 for Tier 1 for this six-month period. Tier 2 remedies would not change. This represents about a 7% decrease in total SEEM remedies for this period. See also the comments concerning the interrelated nature of individual BellSouth proposed SEEM changes in action item 11.

BellSouth has provided, as Attachment 3, actual examples where SEEM remedies are much higher than necessary under the current plan, and how the proposed changes to this section aids in correcting the problem.

REQUEST: Please provide an analysis of the impact to SEEM metrics if the changes proposed by BellSouth in Section 4.3.1.5 were adopted. The proposed change should be applied to at least 6 months of historical SEEM data and include the impact to both Tier 1 and 2.

RESPONSE: Based on the SEEM data for the period January – June 2006, if BellSouth's proposed changes to the Section 4.3.1.5 were adopted, the average monthly decrease in SEEM remedies would be about $66,800 for Tier 1 and about $19,700 for Tier 2. This represents about a 19% decrease in total SEEM payments for this six-month period. See also the comments concerning the interrelated nature of individual BellSouth proposed SEEM changes in action item 11.

BellSouth has provided, as Attachment 4, actual examples where SEEM remedies are much higher than necessary under the current plan, and how the proposed changes to this section aids in correcting the problem.

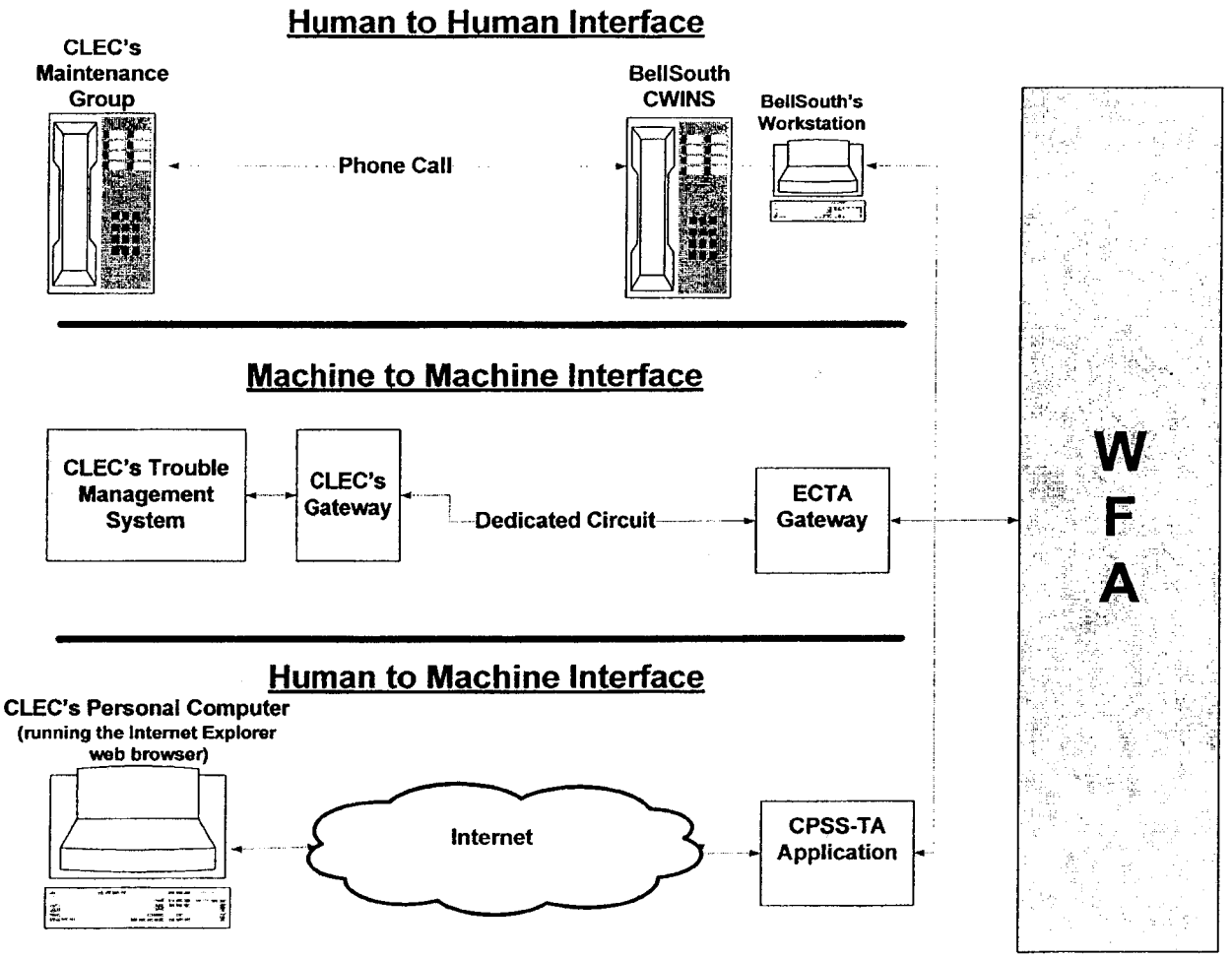
REQUEST: Please provide an analysis of the impact to SEEM metrics if the changes proposed by BellSouth in Section 4.4.10 were adopted. The proposed change should be applied to at least 6 months of historical SEEM data and include the impact to both Tier 1 and 2. The total amount of dollars which would not have been paid each month should also be reported.

RESPONSE: There were a total of 151 SEEM payments of less than $100 made for the data months January – June 2006. The totals by month and the six-month period are provided below:

Data Month	Payment
January	$967.34
February	$1,119.74
March	$1,097.18
April	$1,081.43
May	$1,022.34
June	$1,352.33
Total	**$6,640.36**

Attachment 1 Basic Flow Diagram for Design Troubles

Maintenance Interface for Designed Products



Examples of Relative Magnitude of SEEM Remedies

Measure Categories	Month Six	Aggregate Failure Multiplier Retail Analog	Aggregate Failure Multiplier Benchmark	Price per unit of affected volume	Average Monthly Revenue from a UNE-Loop	Equivalent Months of Revenue for BellSouth
OSS/Pre-Ordering	$ 35.00	3	3	$ 105.00	$ 17.62	6.0
Ordering	$ 45.00	3	2.5	$ 112.50	$ 17.62	6.4
Service Order Accuracy	$ 20.00	3	3	$ 60.00	$ 17.62	3.4
Flow Through	$ 65.00	3	2.5	$ 162.50	$ 17.62	9.2
Provisioning-Resale	$ 200.00	3	3	$ 600.00	$ 20.00	30.0
Provisioning-UNE	$ 230.00	3	3	$ 690.00	$ 17.62	39.2
Maintenance and Repair-Resale	$ 200.00	3	3	$ 600.00	$ 20.00	30.0
Maintenance and Repair-UNE	$ 230.00	3	3	$ 690.00	$ 17.62	39.2
LNP	$ 615.00	3	3	$ 1,845.00	$ 17.62	104.7
Billing		3	3		NA	NA
Trunk Group Performance	$ 125.00	3	3	$ 375.00	NA	NA
Collocation	$ 3,165.00	3	3	$ 9,495.00	NA	NA

Notes:

1. Most benchmark measures multiply the fee schedule by 1.5 with an aggregate pass and 3 with an aggregate failure. Flow-Through and ordering fees are multiplied by 2.5 in the event of an aggregate failure. In addition, the Tier I fee schedule escalates with each month of consecutive failure for the CLEC up to month 6.
2. Based on average FL UNE-Loop recurring rate: Zone 1 - $10.69 / Zone 2 - $15.20 / Zone 3 - $26.97, an average recurring charge for UNE = $17.62 is used for comparison purposes. This is compared to the price per unit of affected volume for the SEEM plan..
3. All retail analog measures multiply the fee schedule by 1.5 with an aggregate pass and 3 with an aggregate failure. In addition, the Tier I fee schedule escalates with each month of consecutive failure for the CLEC up to month 6.
4. $20.59 is an approximation for a Resale Business Line (1FB) in Florida. Florida General Services Subscriber Tariff had zone prices from $22 to $26. The $24 average zone price was discounted by 16.8% to derive $20 figure.

Retail Analog Measurements	FL SEEM Dollars Transmitted from January 2006 - June 2006	Total Affected Volume from January 2006-June 2006	Remedies divided by Total Affected Volume=Price Per Failure	Equivalent Months of Revenue for BellSouth
Order Completion Interval	$ 325,777.45	830	$ 392.50	22.28
Percent Missed Installation Appointments	$ 44,332.48	253	$ 175.23	9.94
Customer Trouble Report Rate	$ 191,250.77	1247	$ 153.37	8.70
With BellSouth's SEEM proposal:				
Order Completion Interval	$201,933	830	$ 243.29	13.81
Percent Missed Installation Appointments	$30,450	253	$ 120.36	6.83
Customer Trouble Report Rate	$132,548	1247	$ 106.29	6.03

Note:
Based on average FL UNE-Loop recurring rate: Zone 1 - $10.69 / Zone 2 - $15.20 / Zone 3 - $26.97, an average recurring charge for UNE = $17.62 is used for comparison purposes. This is compared to the price per failure in the table above. The "Equivalent Months of Revenue for BellSouth" is the "Price Per Failure" divided by $17.62.

Benchmark Remedy Analysis Based on Actual SEEM Payments				
Benchmark Measurements	**FL SEEM Dollars Transmitted from January 2006-June 2006**	**Total Affected Volume from January 2006-June 2006**	**Remedies divided by Total Affected Volume=Price Per Failure**	**Equivalent Months of Revenue for BellSouth**
FOCT-Firm Order Confirmation Timeliness	$ 358,162.50	4053	$ 88.37	5.02
NCDD-Non-Coordinated Customer Conversions-Percent Completed	$ 57,915.00	250	$ 231.66	13.15
PFT-Flow Through Service Requests	$ 157,912.50	1627	$ 97.06	5.51
With BellSouth's SEEM proposal				
FOCT-Firm Order Confirmation Timeliness	$194,622	4053	$ 48.02	2.73
NCDD-Non-Coordinated Customer Conversions-Percent Completed	$31,960	250	$ 127.84	7.26
PFT-Flow Through Service Requests	$52,187	1627	$ 32.08	1.82

Note:
Based on average FL UNE-Loop recurring rate: Zone 1 - $10.69 / Zone 2 - $15.20 / Zone 3 - $26.97, an average recurring charge for UNE = $17.62 is used for comparison purposes. This is compared to the price per failure in the table above. The "Equivalent Months of Revenue for BellSouth" is the "Price Per Failure" divided by $17.62.