Ruth Nettles

From:	nicki.garcia@akerman.com
Sent:	Wednesday, August 05, 2009 10:58 AM
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Subject:	Electronic Filing - Docket No. 000121A

Attachments: 20090805101934419.pdf

Attached is an electronic filing for the docket referenced above. If you have any questions, please contact either Matt Feil or Nicki Garcia at the numbers below. Thank you.

Person Responsible for Filing:

Matthew J. Feil
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Docket No. and Name:

Docket 000121A -- Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (AT&T FLORIDA TRACK)

Filed on Behalf of: ~~DeltaCom, Inc. and NuVox~~ CompSouth (phone *verified by*) NHmcJean

Total Number of Pages: 11

Description of Documents: Corrected pages which replace the erroneous pages in the July 10, 2009 filing.

Nicki Garcia
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8/5/2009

DOCUMENT NUMBER-DATE

08041 AUG-5 8

FPSC-COMMISSION CLERK

AkermanSenterfitt

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8/5/2009

August 5, 2009

VIA ELECTRONICALLY

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: **Docket 000121A — Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (AT&T FLORIDA TRACK)**

Dear Ms. Cole:

As I noted during the conference call with parties and staff on July 29, CompSouth identified a few errors in the redlined plan it filed with the Commission on July 10. Please find attached corrected pages which replace the erroneous pages in the July 10 filing.

The corrections affect the following parts of the SQM plan: P-9, MR-1, MR-2, MR-3, MR-4, CM-5 and Appendix G. For the P-9, MR-1, MR-2, MR-3, and MR-4 metrics, the error consisted of an inadvertent strike-through of the UNE Digital Loop > DS-1 disaggregation category. For CM-5, the error consisted of a strike-through of LENS, TAG and ETCA in the disaggregation list. For Appendix G, the error consisted of the elimination of formulae in Sections A and B. We believe the error was caused when a formatting tag on the Word 2007 version of the document improperly translated when the document was converted to Word 2002. We apologize for the inconvenience and believe all of these errors are cured with this filing.

DOCUMENT NUMBER-DATE

08041 AUG -5 ∞

FPSC-COMMISSION CLERK

If you have any questions, please contact me at 850-425-1614.

Sincerely,

Matthew Feil

Enclosures

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail or electronically to the following parties of record this 5th day of August, 2009:

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P-9 [PPT]: Percent Provisioning Troubles within "X" Days of Service Order Completion

Definition

This report measures the quality and accuracy of the provisioning process by calculating the percentage of troubles received within "X" days of service order completion.

Exclusions

- Canceled Service Orders
- Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or T)
- Disconnect Orders
- Trouble reports caused and closed out to Customer Provided Equipment (CPE) or CLEC Equipment
- Listing Orders
- Troubles outside of BellSouth's control
     A cut or damaged cable, caused by other than BellSouth employees or contractors
     Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth

Business Rules

The first trouble report received after the completion of a service order is counted in this measure. When the completed service order is matched to a trouble report, it is uniquely counted one time in the numerator. Candidates are identified by searching the prior report period for all completed service orders and then searching for all trouble reports received within 5 days (POTS Non-Designed services) or 14 days (Designed services) of the service order completion date.

Calculation

Percent Provisioning Troubles within "X" Days of Service Order Completion = (a / b) X 100

- a = Total completed orders receiving a trouble report within "X" days of the service order(s) completion
- b = All service orders completed in the previous reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Dispatch /Non-Dispatch (except trunks)
- Geographic Scope
     - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
Resale Residence (Non-Design)	Retail Residence (Non-Design)
Resale Business (Non-Design)	Retail Business (Non-Design)
Resale Design	Retail Design
LNP (Standalone)	Retail Residence and Business (POTS)
UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Orders)
UNE Analog Loop with LNP Design	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)
UNE Analog Loop with LNP Non-Design	Retail Residence and Business - POTS (Excluding Switch Based Orders)
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1

<div style="text-align: right">P-9 [PPT]: Percent Provisioning Troubles within "X" Days of Service Order</div>

Section 4: Maintenance & Repair

M&R-1 [MRA]: Percent Missed Repair Appointments

Definition

This report measures the percentage of customer trouble reports closed in the current reporting period and not cleared by the committed date and time.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC Equipment Troubles
- Informational Tickets
- Troubles outside of BellSouth's control
    A cut or damaged cable, caused by other than BellSouth employees or contractors
    Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth

Business Rules

The negotiated commitment date and time is established when the repair report is received. The cleared time is the date and time BellSouth personnel clear the trouble and close the customer trouble report in their workstation. If this is after the commitment time, the report is flagged as a 'missed commitment' or a 'missed repair appointment'. If no access occurs after the commitment time, the report is flagged a missed appointment.

Calculation

Percentage of Missed Repair Appointments $= (a / b) \times 100$

- a = Count of customer troubles not cleared by the quoted commitment date and time
- b = Total customer trouble reports closed in the reporting period

Report Structure

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
    - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
Resale Residence (Non-Design)	Retail Residence (Non-Design)
Resale Business (Non-Design)	Retail Business (Non-Design)
Resale Design	Retail Design
UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN/UDC/IDSL	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic

M&R-2 [CTRR]: Customer Trouble Report Rate

Definition

This report measures the percentage of customer troubles closed within a calendar month.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports/lines associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC Equipment Troubles
- Informational Tickets
- Troubles outside of BellSouth's control
    - A cut or damaged cable, caused by other than BellSouth employees or contractors
    - Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth

Business Rules

Customer Trouble Report Rate contains all closed customer and/or CLEC direct reports, including repeat reports, divided by the total "number of service" lines.

Calculation

Customer Trouble Report Rate = (a / b) X 100

- a = Count of initial and repeated customer trouble reports closed in the current reporting period
- b = Number of lines in service at end of the reporting period

Report Structure

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
    - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
Resale Residence (Non-Design)	Retail Residence (Non-Design)
Resale Business (Non-Design)	Retail Business (Non-Design)
Resale Design	Retail Design
UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN/UDC/IDSL	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non-Design	Diagnostic
Local Interconnection Trunks	Parity with Retail Trunks

M&R-3 [MAD]: Maintenance Average Duration

Definition

This report measures the average duration of customer troubles closed during the reporting period.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC Equipment Troubles
- Informational Tickets
- Troubles outside of BellSouth's control
  A cut or damaged cable, caused by other than BellSouth employees or contractors
  Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth

Business Rules

The duration starts on the date and time of receipt of a repair request and stops on the date and time the service is restored (when the technician completes the trouble ticket on his/her CAT or work systems).

For tickets administered through WFA, (CLECs and BellSouth), durations do not include No Access, Delayed Maintenance and Referred Time.

Calculation

Maintenance Duration = (a - b)

- a = Date and time of service restoration
- b = Date and time customer trouble ticket was opened

Average Maintenance Duration = (c / d)

- c = Total of all maintenance durations in the reporting period
- d = Total closed customer troubles in the reporting period

Report Structure

Report should reflect those tickets received electronically and those received via call to center to access impact of ebonding.

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
Resale Residence (Non-Design)	Retail Residence (Non-Design)
Resale Business (Non-Design)	Retail Business (Non-Design)
Resale Design	Retail Design
UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail

M&R-4 [PRT]: Percent Repeat Customer Troubles within 30 Calendar Days

Definition

This report measures the percentage of customer trouble reports received within 30 calendar days of a previous trouble report.

Exclusions

- Trouble tickets canceled at the CLEC request
- BellSouth trouble reports associated with internal or administrative service
- Customer Provided Equipment (CPE) or CLEC Equipment Troubles
- Informational Tickets
- Troubles outside of BellSouth's control
  A cut or damaged cable, caused by other than BellSouth employees or contractors
  Troubles caused by vandalism/theft, motor accidents or petroleum/chemical accidents caused by parties other than BellSouth

Business Rules

Customer trouble reports considered for this measure are those on the same line/circuit, received within 30 calendar days of an original customer trouble report. Candidates for this measure are determined by using either the 'cleared date' from LMOS or the 'closed date' from WFA of the first trouble, and the 'received date' of the next trouble. Should the measure be from ACTS, EBTA, CPSS, is WFA correct place in measure and if yes why?

Calculation

Percent Repeat Customer Troubles within 30 Calendar Days = (a / b) X 100

- a = Count of repeat customer trouble reports, within a continuous 30 calendar day period
- b = Total customer trouble reports cleared or closed in the reporting period

Report Structure

- Dispatch/Non-Dispatch
- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Geographic Scope
  State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM/SEEM Analog/Benchmark
Resale Residence (Non-Design)	Retail Residence (Non-Design)
Resale Business (Non-Design)	Retail Business (Non-Design)
Resale Design	Retail Design
UNE Analog Loop (Design)	Retail Residence, Business and Design (Dispatch) (Excluding Digital Loops)
UNE Analog Loop (Non-Design)	Retail Residence and Business - POTS (Excluding Switch Based Feature Troubles)
UNE Digital Loop >= DS1	Retail Digital Loop >= DS1
UNE EELs	Retail DS1/DS3
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN/UDC/IDSL	Retail ISDN – BRI
UNE Line Splitting	ADSL Provided to Retail
UNE Other Design	Diagnostic
UNE Other Non-Design	Diagnostic
Local Interconnection Trunks	Parity with Retail Trunks

CM-5 [ION]: Notification of CLEC Interface Outages

Definition

This report measures the time it takes BellSouth to notify the CLECs of an interface outage as defined by the Change Control Process (CCP) documentation.

Exclusions

None

Business Rules

BellSouth has 15 minutes to notify the CLECs via email, once the Help Desk has verified the existence of an outage. An outage is verified to exist when one or more of the following conditions occur:

1. BellSouth can duplicate a CLEC reported system error.
2. BellSouth finds an error message within the error log that identically matches a CLEC reported system outage.
3. When three or more CLECs report the identical type of outage.
4. BellSouth detects a problem due to the loss of functionality for users of a system.

The 15-minute interval begins once a CLEC reported outage or a BellSouth detected outage has lasted for 20 minutes and has been verified. If the outage is not verified within 20 minutes, the interval begins at the point of verification.

Calculation

Notification of CLEC Interface Outages = (a / b) X 100

- a = Number of interface outages where CLECs are notified within 15 minutes
- b = Total number of interface outages

Report Structure

- CLEC Aggregate
- Geographic Scope
  Region

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation   **SQM Analog/Benchmark**

- By interface type for all interfaces accessed by CLECs ....97% <= 15 Minutes

Interface	Applicable to
EDI	CLEC
CSOTS	CLEC
LENS	CLEC
TAG	CLEC
ECTA	CLEC
TAFI	CLEC/BellSouth
LASR	CLEC
XML	CLEC
ACTS	CLEC
EBTA/CPSS	CLEC
LEX	CLEC
Verigate	CLEC

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	

Appendix G: SQM Equity Determination

This document describes the approach utilized in the determination of Equity for mean, proportion, and rate measures within the BellSouth Single Report Structure (SRS). The statistical comparison of BST performance data to CLEC performance data is based upon the "Modified Z" methodology.

A. Standard Error (S)

The Standard Error must be calculated for use as the denominator in the formula for the Z-Score. The appropriate calculation of Standard Error is dependent on the measure type as shown below:

MEAN:

$$S = StDev_{BST} \sqrt{\frac{1}{n_{BST}} + \frac{1}{n_{CLEC}}}$$

PROPORTION:

$$S = \sqrt{\hat{p}_{BST}\left(1 - \hat{p}_{BST}\right)\left(\frac{1}{n_{BST}} + \frac{1}{n_{CLEC}}\right)}$$

RATE:

$$S = \sqrt{\hat{r}_{BST}\left(\frac{1}{n_{BST}} + \frac{1}{n_{CLEC}}\right)}$$

n_{BST} = number of observations for BellSouth in current time period
n_{CLEC} = number of observations for CLECs in current time period
$StDev_{BST}$ = estimated standard deviation of BellSouth performance calculated using current time period's data.

$\hat{p}_{BST}$ = estimated BellSouth performance proportion calculated using current time period's data.

$\hat{r}_{BST}$ = estimated BellSouth performance rate calculated using current time period's data.

B. Z-Score (Z)

Once the Standard Error has been calculated, the Z-Score is then calculated using the formula below:

$$Z = \frac{BST^* - CLEC^*}{S}$$

BST^* = estimated BellSouth mean ($\overline{X}_{BST}$), proportion ($\hat{p}_{BST}$), or rate ($\hat{r}_{BST}$) calculated using the current time period's data.

$CLEC^*$ = estimated CLEC mean ($\overline{X}_{CLEC}$), proportion ($\hat{p}_{CLEC}$), or rate ($\hat{r}_{CLEC}$) calculated using the current time period's data.

C. Equity Determination

After calculation of the Z-Score, Equity is determined using the criteria shown in the table below:

	Better Performance ↑	Better Performance ↓
YES	Z <= 1.645	Z >= -1.645
NO	Z > 1.645	Z < -1.645

Exception 1: A Z-Score value cannot be determined if a Standard Error value is 0. In that case, Equity is determined using the "Direct Comparison" criteria shown in the table below

Exception 2: Measures OSS-1 (ARI), O-12 [OAAT], B-1 [BJA], B-2 [BIT], and M & R-6 [MAAT] also use the "Direct Comparison" criteria.

	Better Performance ↑	Better Performance ↓
YES	CLEC Measure >= BST Measure	CLEC Measure <= BST Measure
NO	CLEC Measure < BST Measure	CLEC Measure > BST Measure