

Ruth Nettles

000121A-TP

From: nicki.garcia@akerman.com
Sent: Monday, December 14, 2009 3:29 PM
To: Filings@psc.state.fl.us
Cc: Adam Teitzman; kip.edenfield@att.com; douglas.c.nelson@sprint.com; gene@penningtonlawfirm.com; vkaufman@kagmlaw.com; dkonuch@fcta.com; de.oroark@verizon.com; tony.mastando@deltacom.com; jerry.watts@deltacom.com; mconquest@nuvox.com; kmudge@covad.com; ebalvin@covad.com; greg.darnell@cbeyond.net; jayna.bell@cbeyond.net; sberlin@nuvox.com; gene.watkins@cbeyond.net; carolyn.ridley@twtelecom.com; kristie.ince@twtelecom.com; nora.torrez@twtelecom.com; shelly.pedersen@twtelecom.com; julie.mendenhall@twtelecom.com; Jerry Hallenstein; Lisa Harvey; matthew.feil@akerman.com; robert.culpepper.1@att.com; ebalvin@covad.com; Richard.Brown@accesspointinc.com; Bob.Buerrosse@xo.com; John.Ivanuska@xo.com; Kris.Shulman@xo.com; Mhring@cavtel.com; Sharyl.Fowler@birch.com; Bill.Atkinson@sprint.com; Tracy Hatch; tim_kagele@cable.comcast.com; michael_clancy@cable.comcast.com; randee_ryan@cable.comcast.com; richard_wolfe@cable.comcast.com; rcurry@ststelecom.com
Subject: Electronic Filing - Docket No. 000121A
Attachments: 20091214162326532.pdf

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

Person Responsible for Filing:

Matthew Feil
AKERMAN SENTERFITT
 106 East College Avenue, Suite 1200
 Tallahassee, FL 32301
 (850) 425-1614 (direct)
 (850) 222-0103 (main)
 matt.feil@akerman.com

Docket No. and Name: Docket No. 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: CompSouth

Total Number of Pages: 11

Description of Documents: CLEC responses to the Action Item List generated from the December 3rd staff conference call.

Nicki Garcia

Office of:
 Lila A. Jaber
 Matthew Feil

Akerman Senterfitt
 106 East College Avenue, Suite 1200
 Tallahassee, FL 32301
 (850) 425-1677
 Nicki.Garcia@Akerman.com

DOCUMENT NUMBER-DATE

11931 DEC 14 8

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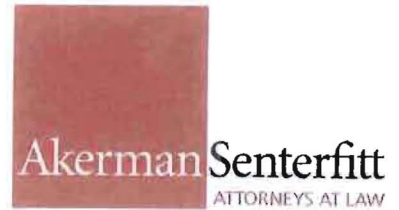
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Suite 1200
106 East College Avenue
Tallahassee, FL 32301
www.akerman.com
850 224 9634 tel 850 222 0103 fax

December 14, 2009

VIA ELECTRONIC FILING

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:

Please find attached for filing the Competitive Local Exchange Carrier ("CLEC") responses to the Action Item List generated from the December 3rd staff conference call for the above docket. Please note that this filing represents the consensus of CLECs who participated in the conference call; including Comcast, STS and the members of CompSouth.

Your assistance in this matter is greatly appreciated. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Matthew Feil

Attachments

DOCUMENT NUMBER-DATE

11931 DEC 14 8

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ITEM No. 36

REQUEST: Review AT&T's proposal to leave P-11 as is in the current SQM Plan, with the exception of rolling-up disaggregation (resale and UNEs).

RESPONSE: CLECs agree to the AT&T proposal.

DOCUMENT NUMBER-DATE

11931 DEC 14 8

FPSC-COMMISSION CLERK

ITEM No. 37

REQUEST: Review AT&T's proposed changes to this measure (see AT&T's 11/24 response to Action Item 16).

RESPONSE: CLECs are awaiting data comparison from AT&T.

ITEM No. 38

REQUEST: Review AT&T's proposed changes to this measure (M&R-2). (See AT&T's 11/24 response to Action Item 16.)

RESPONSE: CLECs are awaiting data comparison from AT&T.

ITEM No. 43

REQUEST: Timeline for joint Change Management Task Force.

RESPONSE: CLECs are continuing to work off a partial red line and will review pages 59-89 on December 11 and the next section on December 18. CLECs do not have full red line from AT&T and will follow-up for missing sections. A joint call has been established for January 8, 2010, with all parties. We are unable to determine a firm project end date, but the end of the first quarter appears likely.

ITEM No. 44

REQUEST: Provide SQM redline that incorporates CM-1 and CM-3.

RESPONSE: See attached Appendix.

Change Management

SQM#	Measure Category Code	Title of the Measure		
CM-1	N1	<u>Timeliness of Change Management Notices</u>		
Definition		<p><u>This report measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces.</u></p> <ul style="list-style-type: none"> • Timeliness metric to simplify plan. • AT&T commitment provides a high level of performance. This proposal measure was made for six (6) months from 2009 to May 2009. • Measure a process that does not have direct significant impact on CLEC and end users. 	<p>Definition This report measures whether CLECs received notice/documentation on time to prepare for hardware, and or software changes in the form of Major OSS Release, Minor OSS Releases, Business Rules, Testing Plans, Change Request, System Retirement, and data needs to accurately prioritize and package release content. 12-11-2009</p> <p>This report measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change. <u>The Accessible Link communication the CR being entered in setting a major or minor release. The CCP is used by BellSouth and the CLECs to manage requested changes to the BellSouth local interfaces</u></p>	<p>CLECs: PROPOSAL TO COMBINE CM-1 & CM-3</p> <p>NOTE: CLECs are expecting a CMP/CCP comparison document and wish to review before working these measures 8-27-2009</p> <p>CLECs 9-19-2009 – CLECs propose to keep metric as is in current plan and be subject to future review after completion of change management workshops on processes.</p> <p>AT&T 10/12/09 PROPOSAL/RESPONSE:</p>
Exclusions		<ul style="list-style-type: none"> • <u>Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes (for example a patch to fix a software problem)</u> • <u>Type 6 Change Requests (Defects/Expedites) as defined by the Change Control Process (CCP)</u> 	<p>Exclusions Defects, Type 6 CR and Outages Type 1 CR are covered in CM-5 & CM-6 and are excluded from this measure. 12-11-2009</p> <p><u>Changes to release dates for reasons outside BellSouth control, such as the system software vendor changes (for example a patch to fix a software problem)</u></p> <ul style="list-style-type: none"> • Type 6 Change Requests (Defects/Expedites), as defined by the Change Control Process (CCP) 	

Business Rules	<p>The <u>impact of lagging on the notification date and early on the software release date</u>. When project events occur (scope changes, analysis information, etc.) the software release date may change. A revised notification would be required and the <u>interval would restart</u>. Based on release constraints for defects expedites notification may be less than the agreed upon interval in the CCP for new features.</p>		
Calculation	<p><u>Timeliness of Change Management Notices</u> $\frac{C - N}{N} \times 100$</p> <p> $\leftarrow C$ — Total number of Change Management Notifications sent within required timeframe $\leftarrow N$ — Total number of Change Management Notifications sent </p>		
Report Structure	<p> \bullet — BellSouth - Aggregate \bullet — Synovate - Source Baseline </p>		
SQM Disaggregation Analog/Benchmark	<p><u>SQM Level of Disaggregation</u> <u>SQM Analog/Benchmark</u></p> <ul style="list-style-type: none"> \bullet — <u>Historical 98% on time</u> 	<p>Major Release Notification, Minor Release Notification, Business Rules, Final Release Requirements, Testing Plan Notices, Change Request Log for Prioritization, System Retirement Notice, Preliminary Sizing for Release Package, Appendix I-A</p>	<p>Major Release Notice 99% 60 weeks in advance of Implementation, Minor Release 99% Notification 30 days in advance of Implementation, Business Rules 99% 30 day prior to production, Coding Matrix/Final Release Requirements 99% 110 days in advance of implementation, Testing Plan notices 99% 5 week prior to production, Change Request Log for CR's to be prioritized</p>
SEEM Measure	<p><u>SEEM Tier I Tier II</u> <u>Yes X</u></p>	<p>SEEM Measure SEEM Tier I Tier II Yes Δ X</p>	

ITEM No. 45

REQUEST: Review and propose revisions to Item 4 under Audit Policy. (See AT&T's 11/24 response to Action Item 30.)

RESPONSE: The parties have exchanged redlines but as of this writing have not reached agreement. The core disagreement is that CLECs believe that disputes under the SQM Plan and SEEM plan should be resolved pursuant to the dispute resolution language in the CLEC's interconnection agreement (ICA) with AT&T. AT&T believes the ICA should be by-passed and the Commission should resolve disputes. DR language for the SEEM plan would face a similar disagreement.

The following is AT&T's redline to the CLEC dispute resolution language submitted as CLEC follow up Item No. 31 from last workshop.

~~This SQM Plan and the related self-effectuating enforcement mechanisms (SEEM) plan are~~ is not intended to limit any provision or provisions in an Interconnection Agreement between AT&T and a CLEC. If a dispute arises regarding ~~the SQM or related SEEM payments~~ AT&T's performance or obligations pursuant to this Plan, the Parties ~~in dispute~~ shall negotiate in good faith for a period of thirty (30) days to resolve the dispute. If at the conclusion of the 30 day period the Parties are unable to ~~reach a resolution, then the dispute shall be resolved by the Commission~~ resolve the dispute, ~~either party may seek to have the dispute resolved in accordance with the dispute resolution provisions of the Parties' interconnection agreement.~~

Below is the CLEC counter-proposal to AT&T's redline:

~~This SQM Plan and the related self-effectuating enforcement mechanisms (SEEM) plan are~~ is not intended to limit any provision or provisions in an Interconnection Agreement between AT&T and a CLEC. If a dispute arises regarding ~~the SQM or related SEEM payments~~ AT&T's performance as measured by this Plan or obligations pursuant to this Plan, the Parties ~~in dispute~~ shall negotiate in good faith for a period of thirty (30) days to resolve the dispute. If at the conclusion of the 30 day period the Parties are unable to reach a resolution, ~~then the dispute shall be resolved by the Commission~~ resolve the dispute, either party may seek to have the dispute resolved in accordance with the dispute resolution provisions of the Parties' interconnection agreement.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-mail this 14th day of December, 2009:

Adam Teitzman Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 ateitzma@psc.state.fl.us	E. Earl Edenfield, Jr. Robert Culpepper c/o Gregory Follensbee AT&T/AT&T Florida 150 South Monroe Street, Ste 400 Tallahassee, FL 32301 kip.edenfield@att.com
Douglas Nelson Sprint Nextel 233 Peachtree Street, NE Suite 2200 Atlanta, GA 30303 douglas.c.nelson@sprint.com Bill.Atkinson@sprint.com	Howard E. (Gene) Adams Pennington, Moore, Wilkinson, Bell & Dunbar, P.A. PO Box 10095 Tallahassee, FL 32302 gene@penningtonlawfirm.com
Vicki Gordon Kaufman Keefe Anchors Gordon & Moyle P.A. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 vkaufman@kagmlaw.com	David Konuch Senior Counsel Regulatory Law & Technology Florida Cable Telecommunications Assoc. 246 East 6 th Avenue Tallahassee, FL 32303 dkonuch@fcta.com
Dulaney O'Roark III Vice President & General Counsel Southeast Region Verizon 5055 North Point Parkway Alpharetta, GA 30022 de.oroark@verizon.com	D. Anthony Mastando Vice President-Regulatory Affairs DeltaCom 7037 Old Madison Pike, Ste 400 Huntsville, AL 35806 tony.mastando@deltacom.com Jerry.Watts@deltacom.com
Susan J. Berlin NuVox Communications Two North Main Street Greenville, SC 29601 sberlin@nuvox.com MConquest@nuvox.com	Ms. Katherine K. Mudge Covad Communications Company 7000 N. MoPac Expressway, 2 nd Floor Austin, TX 78731 kmudge@covad.com ebalvin@covad.com

Charles E. (Gene) Watkins
Cbeyond Communications, LLC
320 Interstate North Parkway
Suite 30
Atlanta, GA 30339
gene.watkins@cbeyond.net
Greg.Darnell@cbeyond.net
Jayna.Bell@cbeyond.net

Carolyn Ridley
tw telecom
555 Church Street, Ste 2300
Nashville, TN 37219
carolyn.ridley@twtelecom.com
Kristie.Ince@twtelecom.com
Nora.Torrez@twtelecom.com
Shelly.Pedersen@twtelecom.com
Julie.Mendenhall@twtelecom.com



Matthew J. Feil
Akerman Senterfitt
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 224-9634
matt.feil@akerman.com