

**Ruth Nettles**

000121A-TP

**From:** WOODS, VICKIE (Legal) [vf1979@att.com]  
**Sent:** Friday, January 15, 2010 2:53 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** 000121A-TP AT&T Florida's additional Responses to the action items from the December 16-17, 2009 Workshop  
**Importance:** High  
**Attachments:** Document.pdf

A. Vickie Woods  
Legal Secretary to E. Earl Edenfield, Jr., Tracy W. Hatch,  
and Manuel A. Gurdian

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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 Tracy W. Hatch

D. 12 pages total in PDF format (Letter, Certificate and Responses)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Additional Responses to the action items from the December 16-17, 2009 workshop

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1/15/2010



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January 15, 2010

Ann Cole, Commission Clerk  
Office of the Commission Clerk  
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 performance measures for incumbent local exchange Telecommunications companies (BellSouth Track)**

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's additional Responses to the action items from the December 16-17, 2009 workshop with the parties.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,  
  
Tracy W. Hatch

Enclosures

cc: All parties of record  
Jerry D. Hendrix  
Gregory R. Follensbee  
E. Earl Edenfield, Jr.

**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 15<sup>th</sup> day of January 2010 to the following:

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Tracy W. Hatch

(+) Signed Protective Agreement

REQUEST: Number of orders rejected for no facilities [P-1]

RESPONSE: Refer to table below for service orders put into jeopardy status "Customer Facility" due to lack of facilities.

Jeopardy Designation	Product type	5/1/2009	6/1/2009	7/1/2009	8/1/2009	9/1/2009	10/1/2009	Grand Total
CF	Resale Business (Non-Design)							0
CF	Resale Residence (Non-Design)	2	4	4	2	6	5	23
CF	UNE Digital Loop >= DS1	12	18	21	12	21	9	93
CF	UNE ISDN/UDC/IDSL			2				2
CF	UNE Other Non-Design							0
CF	UNE xDSL (HDSL, ADSL, and UCL)						1	1
CF	UNE EELs	4	7	3	20	6	6	46
CF	UNE Analog Loop Non-Design		7	2	1	1	1	12
CF	UNE Analog Loop Design	1	1		1	5		8
<b>TOTAL CF</b>		<b>19</b>	<b>37</b>	<b>32</b>	<b>36</b>	<b>39</b>	<b>22</b>	<b>185</b>
<b>% of Orders Jeop'd due to CF</b>		<b>3.05%</b>	<b>5.58%</b>	<b>4.58%</b>	<b>5.15%</b>	<b>5.79%</b>	<b>3.43%</b>	<b>4.63%</b>
<b>Grand Total All Orders with Jeopardy Codes</b>		<b>623</b>	<b>663</b>	<b>698</b>	<b>699</b>	<b>674</b>	<b>642</b>	<b>3999</b>

DOCUMENT NUMBER-DATE

00417 JAN 15 09

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**REQUEST:** Provide analysis of remedies impact for change to epsilon and other changes to SEEM Plan.

**RESPONSE:** Refer to tables below for Tier 1 change comparison

1. Liability Change if Epsilon Changes from 2.5 to 4.0

<b>Florida</b>			
<b>Month</b>	<b>Original Liabilities</b>	<b>New Epsilon Liabilities</b>	<b>Difference (-)</b>
200811	\$126,475	\$115,926	\$10,551
200812	\$108,686	\$96,187	\$12,498
200901	\$96,582	\$78,565	\$18,017
200902	\$84,440	\$70,833	\$13,607
200903	\$76,216	\$64,112	\$12,104
200904	\$93,019	\$74,546	\$18,473
Grand Total	\$585,419	\$500,167	\$85,252

2. Liability Change for Small Sample Change

<b>Florida</b>			
<b>Month</b>	<b>Original Liabilities</b>	<b>New Liabilities</b>	<b>Difference (-)</b>
200811	\$126,475	\$122,005	\$4,470
200812	\$108,686	\$104,531	\$4,155
200901	\$96,582	\$93,210	\$3,373
200902	\$84,440	\$82,933	\$1,508
200903	\$76,216	\$74,566	\$1,650
200904	\$93,019	\$92,239	\$780
Grand Total	\$585,419	\$569,484	\$15,935

3. Liability w/o Multiplier

<b>Florida</b>			
<b>Month</b>	<b>Original Liabilities</b>	<b>No Multipliers</b>	<b>Difference (-)</b>
200811	\$126,475	\$90,616	\$35,859
200812	\$108,686	\$81,949	\$26,737
200901	\$96,582	\$83,617	\$12,965
200902	\$84,440	\$67,992	\$16,448
200903	\$76,216	\$63,352	\$12,864
200904	\$93,019	\$87,125	\$5,894
Grand Total	\$585,419	\$474,650	\$110,769

4. Liability with no BCV to 0

<b>Florida</b>			
<b>Month</b>	<b>Original Liabilities</b>	<b>No BCV to 0</b>	<b>Difference (-)</b>
200811	\$126,475	\$114,739	\$11,736
200812	\$108,686	\$95,281	\$13,405
200901	\$96,582	\$79,876	\$16,706
200902	\$84,440	\$71,440	\$13,000
200903	\$76,216	\$66,485	\$9,731
200904	\$93,019	\$76,499	\$16,520
Grand Total	\$585,419	\$504,319	\$81,100

REQUEST: Analyze and propose a provision in SEEM Plan for limitation on SEEM adjustments (e.g. current data minus three months)

RESPONSE: AT&T proposes the below language to section 4.4.6 of the SEEM Plan to apply a three month limitation on any SEEM remedy payments from the data month of detection of an error.

4.4.6 Any adjustments or miscalculations resulting in an ~~for~~ underpayment or overpayment of ~~calculated~~ Tier 1 remedies will be made for a maximum of three months in arrears consistent with the terms in Paragraph 6 of AT&T's Policy On Reposting of Performance Data and Recalculation of SEEM Payments as set forth in Appendix F of this document. ~~If any circumstance necessitating remedy adjustments should occur that is not specifically addressed in the Reposting Policy, such adjustments will be made consistent with the terms defined in Paragraph 6 of the Reposting Policy ("SEEM payments will be subject to recalculations for a maximum of three months in arrears...") unless the Florida Commission orders otherwise.~~

For further clarification, below is the black-line language to which the parties agreed for Paragraph 6 of Appendix F (AT&T's Policy on Reposting of Performance Data and Recalculation of SEEM Payments) per the AT&T and CLECs Joint Matrix filed on 10-30-2009. The below language as well as that proposed above did exclude Tier-II remedies which is still subject to resolution.

6. SQM Performance data will be reposted for a maximum of three months in arrears from implementation of the change of programming request requirement (RQ) which corrects a detected error. RQs shall not be unreasonably delayed after the date the error is detected. As an example, an error is discovered during the analysis of the May data month performance that triggers a reposting, but the RQ correcting the error is implemented in the calendar month of July with the June data month performance reports, AT&T will correct the data beginning with the month of the RQ implementation (July), which would be for the June data month performance reports, and will repost the data month performance reports for the three months preceding data month performance reports – May, April, and March.



REQUEST: Apply AT&T proposed cap in Table 2 to 2008 and 2009 remedies, and submit results.[SEEM]

RESPONSE: Tier I Liabilities

Florida			
Month	Original Liabilities	Liabilities with Cap	Difference (-)
Jan-08	\$10,230	\$10,230	\$0
Feb-08	\$8,168	\$8,168	\$0
Mar-08	\$102,950	\$78,900	\$24,050
Apr-08	\$456,213	\$212,025	\$244,188
May-08	\$1,088,575	\$494,050	\$594,525
Jun-08	\$71,698	\$71,698	\$0
Jul-08	\$462,168	\$318,068	\$144,100
Aug-08	\$692,843	\$390,730	\$302,113
Sep-08	\$124,605	\$124,605	\$0
Oct-08	\$36,053	\$36,053	\$0
Nov-08	\$33,963	\$33,963	\$0
Dec-08	\$24,190	\$24,190	\$0
Jan-09	\$17,668	\$17,668	\$0
Feb-09	\$12,803	\$12,803	\$0
Mar-09	\$11,483	\$11,483	\$0
Apr-09	\$13,905	\$13,905	\$0
May-09	\$16,620	\$16,620	\$0
Jun-09	\$18,960	\$18,960	\$0
Jul-09	\$8,430	\$8,430	\$0
Aug-09	\$4,928	\$4,928	\$0
Sep-09	\$5,460	\$5,460	\$0
Oct-09	\$3,285	\$3,285	\$0
Total	\$3,225,193	\$1,916,218	\$1,308,975

**REQUEST:** BCV to 0, provide results at the metric level for November 2008 to April 2009.[SEEM]

**RESPONSE:** AT&T's BCV to 0 proposal only impacts metrics based on retail analogs employing the Truncated Z statistical methodology, specifically, the provisioning and maintenance & repair metrics. Only those applicable metrics are noted in the table below.

**Tier I Liabilities**

Florida				
Measure	Metric	Original Liabilities	Liabilities w/o BCV to 0	Difference
M&R-1	Percent Missed Repair Appointments	\$3,645	\$2,415	\$1,230
M&R-2	Customer Trouble Report Rate	\$228,166	\$189,173	\$38,994
M&R-3	Maintenance Average Duration	\$98,041	\$68,933	\$29,108
M&R-4	Percent Repeat Customer Troubles	\$3,310	\$2,955	\$355
M&R-5	Out of Service >24 hrs	\$9,212	\$8,123	\$1,090
P-3	Percent Missed Installation Appointments	\$12,192	\$11,138	\$1,055
P-4	Order Completion Interval	\$85,586	\$77,918	\$7,668
P-9	Percent Provisioning Troubles	\$19,112	\$17,513	\$1,600
<b>Grand Total</b>		<b>\$459,264</b>	<b>\$378,168</b>	<b>\$81,100</b>

**REQUEST:** Provide number of occurrences of sample size less than 30 transactions by month for six months by each benchmark measure.[SEEM]

**RESPONSE:** Unless otherwise noted as Regional Results, the results below are based on Florida state specific data.

**Tier 1 Sample Size  
 Benchmark Measures  
 May 2009 - October 2009  
 Florida**

<b>Measure: PO-2 LMU</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	7	7	8	5	6	5	38
% of Total	54%	54%	57%	50%	46%	45%	51%
Total	13	13	14	10	13	11	74

<b>Measure: O-2 AKC (Regional Results)</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	648	576	657	594	648	639	3762
% of Total	35%	30%	34%	34%	36%	35%	34 %
Total	1836	1863	1881	1737	1755	1800	10872

<b>Measure: O-3 PFT (Regional Results)</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	115	118	113	124	129	122	721
% of Total	39%	34%	33%	35%	42%	40%	37%
Total	290	343	341	348	301	300	1923

<b>Measure: O-8 RI</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	123	120	123	115	122	123	726
% of Total	69%	67%	68%	67%	70%	69%	68%
Total	179	178	182	171	175	177	1062

AT&T Florida  
 FL PSC Docket No. 000121A-TP  
 Responses to December 16-17, 2009  
 Workshop Action Items  
 January 15, 2010  
 Item No. 54  
 Page 2 of 3

<b>Measure: O-9 FOCT</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	131	127	144	130	138	148	818
% of Total	59%	58%	62%	60%	63%	64%	61%
Total	221	219	234	218	220	232	1344

<b>Measure: O-11 FOCC</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	119	114	130	110	127	132	732
% of Total	55%	54%	58%	53%	58%	58%	56%
Total	217	211	226	209	219	226	1308

<b>Measure: P-4 OCI</b>							
<b>(UNE xDSL only)</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	0	2	6	6	0	0	14
% of Total	0%	67%	100%	67%	0%	0%	70%
Total	2	3	6	9	0	0	20

<b>Measure: P-7, CCCI</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	1	1	2	2	0	0	6
% of Total	33%	33%	50%	67%	0%	0%	35%
Total	3	3	4	3	2	2	17

<b>Measure: P-7A, HCT</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	4	2	3	3	3	3	18
% of Total	100%	50%	75%	100%	75%	75%	78%
Total	4	4	4	3	4	4	23

<b>Measure: P-7D, NCDD</b>							
Sample Size	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
<30	2	3	2	1	2	3	13
% of Total	100%	100%	100%	100%	100%	100%	100%
Total	2	3	2	1	2	3	13

AT&T Florida  
 FL PSC Docket No. 000121A-TP  
 Responses to December 16-17, 2009  
 Workshop Action Items  
 January 15, 2010  
 Item No. 54  
 Page 3 of 3

Measure: P-11 SOAC	(Regional Results)						
	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
Sample Size							
<30	152	144	145	138	150	143	872
% of Total	73%	72%	73%	72%	73%	73%	73%
Total	208	200	196	190	204	194	1192

Measure: P-13B, C, D LNP							
	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
Sample Size							
<30	40	39	42	41	41	39	242
% of Total	53%	54%	57%	55%	56%	54%	55%
Total	75	72	74	74	73	72	440

Measure: B-5 BUDT							
	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
Sample Size							
<30	1	2	5	6	4	3	21
% of Total	1%	3%	7%	8%	6%	4%	5%
Total	71	71	74	72	72	72	432

Measure: B-10 PBEC							
	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
Sample Size							
<30	21	26	24	29	28	25	153
% of Total	39%	45%	43%	50%	51%	42%	45%
Total	54	58	56	58	55	60	341

Measure: C-3 MDD							
	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Total
Sample Size							
<30	3	4	6	3	3	4	23
% of Total	100%	80%	100%	100%	100%	100%	96%
Total	3	5	6	3	3	4	24