

**Eric Fryson**

---

**From:** Cooper, Roberta G <Roberta.G.Cooper@centurylink.com>  
**Sent:** Thursday, April 04, 2013 12:16 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Masterton, Susan S; Khazraee, Sandy A  
**Subject:** 000121B-TL-CenturyLink's Reply Comments  
**Attachments:** 000121B-TL CTL Reply Comments.pdf

Filed on Behalf of: Susan S. Masterton  
Senior Corporate Counsel  
CenturyLink  
315 S. Calhoun Street, Suite 500  
Tallahassee, FL 32301  
Telephone: 850/599-1560  
Email: [susan.masterton@centurylink.com](mailto:susan.masterton@centurylink.com)

Docket No. \_\_\_\_\_000121B-TL\_\_\_\_\_

Title of filing: CenturyLink's Reply Comments

Filed on behalf of: CenturyLink

No of pages: \_\_\_\_\_17\_\_\_\_\_

Description: CenturyLink's Reply Comments

**Roberta Cooper**  
Legal Assistant III- Susan Masterton and Kevin Zarling  
Voice: 850-599-1563 | Fax: 850-224-0794  
Email: [Roberta.G.Cooper@centurylink.com](mailto:Roberta.G.Cooper@centurylink.com)  
315 S. Calhoun Street, Suite 500 | Tallahassee, FL 32301  
Mailstop: FLTLHZ0501-5001

DOCUMENT NUMBER - DATE

01664 APR -4 20

FPSC - COMMISSION CLERK

April 4, 2013



**FILED ELECTRONICALLY**

Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Docket No.: 000121B-TP  
CenturyLink's Reply Comments

Dear Ms. Cole:

Attached please find CenturyLink's Reply Comments for filing in the above referenced docket. Thank you for your attention to this matter. If you have any questions, please call me or Sandy Khazaree at 850-847-0173.

Sincerely,

/s/ Susan S. Masterton  
Susan S. Masterton

Enclosures

cc: Sandy Khazaree

**SUSAN S. MASTERTON**  
**Senior Corporate Counsel**  
315 S. Calhoun St., Suite 500  
Tallahassee, Florida 32301  
Tel: (850) 599-1560  
Fax: (850) 224-0794  
Susan.Masterton@centurylink.com

DOCUMENT NUMBER-DATE

01664 APR-4 2013

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 000121B-TP**

I hereby certify that a true and correct copy of the foregoing has been served upon the following by Electronic Mail on this 4<sup>th</sup> day of April, 2013.

Florida Public Service Commission Adam Teitzman Mark Long Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 <a href="mailto:ateitzma@psc.state.fl.us">ateitzma@psc.state.fl.us</a> <a href="mailto:mlong@psc.state.fl.us">mlong@psc.state.fl.us</a>	*AT&T Sonia Daniels 1200 Peachtree Street, #400 Atlanta, GA 30309 <a href="mailto:soniadaniels@att.com">soniadaniels@att.com</a>
AT&T Florida/TCG South Florida, Inc. E. Edenfield/T. Hatch c/o Mr. Gregory Follensbee 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1561 <a href="mailto:greg.follensbee@att.com">greg.follensbee@att.com</a>	Florida Cable Telecommunications Association, Inc. David A. Konuch 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 <a href="mailto:dkonuch@fcta.com">dkonuch@fcta.com</a>
MegaPath Corporation Mr. Gregory T. Diamond 7901 Lowry Blvd. Denver, CO 80230-6906 <a href="mailto:gdiamond@covad.com">gdiamond@covad.com</a>	Pennington Law Firm Peter Dunbar P.O. Box 10095 Tallahassee, FL 32301 <a href="mailto:pete@penningtonlawfirm.com">pete@penningtonlawfirm.com</a>
tw telecom of florida l.p. Ms. Carolyn Rieley 2078 Quail Run Drive Bowling Green, KY 42104 <a href="mailto:Carolyn.Ridley@twtelecom.com">Carolyn.Ridley@twtelecom.com</a>	TCG Ms. Lisa A. Sapper 1200 Peachtree Street, N.E., Ste. 8100 Atlanta, GA 30309-3579 <a href="mailto:lisariley@att.com">lisariley@att.com</a>
CompSouth Gunster Law Firm Kellie Scott 215 South Monroe St., Suite 601 Tallahassee, FL 32301 <a href="mailto:kscott@gunster.com">kscott@gunster.com</a>	

\*Requested to be Removed from Service List.

/s/ Susan S. Masterton  
Susan S. Masterton

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (CenturyLink Florida Track)	Docket No. 000121B-TL  Filed: April 4, 2013
---	---

**CENTURYLINK'S REPLY COMMENTS**

Embarq Florida, Inc. d/b/a CenturyLink ("CenturyLink") hereby files its comments in reply to the Comments of the Competitive Carriers of the South ("CompSouth") filed on March 20, 2013.

**Overall Context**

CenturyLink filed its revised Performance Measurement Plan (PMP) in Florida pursuant to Order No. PSC-03-0067-PAA-TP ("CenturyLink OSS Order").<sup>1</sup> This Florida filing was triggered by the Nevada Public Utilities Commission approving changes to CenturyLink's PMP. The filing is designed to keep PMP provisions consistent among states, as contemplated by the Commission in the CenturyLink OSS Order. In the Nevada process, approval of the changes to the PMP is the result of interactions among all the parties, i.e., CenturyLink, CLECs and the Nevada commission staff, and is typically in the spirit of negotiated settlement. Such was the case in the current instance.

The CenturyLink OSS Order allows CLECs and Commission staff the opportunity to review any PMP changes approved in Nevada before staff brings a recommendation to the Commission to implement them in Florida. In this regard, in making the present filing,

---

<sup>1</sup>*In re: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange companies. (Sprint-Florida Track, Order No. PSC-03-0067\_PAA-TP in Docket No. 000121B-TP, issued January 9, 2003. (Sprint-Florida subsequently changed its name to Embarq Florida, Inc. d/b/a CenturyLink.)*

CenturyLink expected and is prepared to answer any questions that arise about the changes approved in Nevada and to provide necessary explanations. However, there is no basis to suggest that such detailed explanations and support should have accompanied the initial filing, as implied in CompSouth's comments.<sup>2</sup>

Some of the changes reflected in the revised PMP were proposed in order to update measurements and standards to reflect CenturyLink's introduction and implementation of a new ordering system, called "EASE,"<sup>3</sup> that took place in late 2009 and replaced the "IRES"<sup>4</sup> system. At the least, this involved nomenclature changes within the measurements' business rules. But it also involved some metric revisions and changes to standards. Accordingly, in late 2009, the Nevada Commission approved a waiver for some measurements due to the change in data flows from old to new systems<sup>5</sup>. Some of the current revisions proposed in the PMP will implement the end of that waiver, including revising some benchmarks to reflect the enhanced capabilities of the EASE system. Further, some of these enhancements involved improvements in the accuracy and stability of system responses. This, in turn, sometimes required longer query/response times, in the ranges of several seconds, to accommodate the additional processing involved in achieving the added quality of query responses.

As noted above, a primary purpose for the requirement in the CenturyLink OSS Order to file and seek approval of the approved Nevada PMP in Florida is to preserve Plan consistency for CenturyLink and the affected CLECs. Such consistency is important, because both CenturyLink and CLECs operate across multiple states, and because administrative consistencies translate into

---

<sup>2</sup> For example, on page 2 of its comments, under II.A., CompSouth states, "CenturyLink does not, however, explain why these measures should be changed, nor identify any harm that arises from maintaining the status quo."

<sup>3</sup> "Embarq Administration & Service ordering Exchange" system.

<sup>4</sup> "Integrated Request Entry System."

<sup>5</sup> CenturyLink did not request a waiver of the reporting requirements in Florida and continued reporting under the existing Plan.

operational efficiencies.<sup>6</sup> These efficiencies, in turn, help avoid unnecessary and potentially costly differences and complexities in operational processes, procedures, and systems that support the data flows and performance levels of the measurements set forth in the PMP.

Finally, it is important to recall that CenturyLink is deregulated as to retail service quality standards and reporting in Florida. Thus, CenturyLink's OSS plan provides CLECs with visibility to performance data beyond what is required for retail customers and competitors. Nevertheless, the same competitive realities, or the equivalent, that supported the retail deregulation also exist in the wholesale marketplace, where numerous competitive alternatives exist for attracting customers away from CenturyLink's network. Thus, CenturyLink has more than sufficient incentives, independent of any performance measurement plan, to provide competitive service levels to CLECs, both to help keep more customers on CenturyLink's network and also to fulfill federal requirements to provide nondiscriminatory service levels to CLECs.

In this context, CenturyLink asserts this filing should not create a basis for any party to propose other changes to the PMP. Rather, the current process is simply to provide information to the Commission that will assist it in making a determination on implementing the Nevada-revised PMP in Florida, which will preserve consistency for all concerned. In considering whether to approve the continued mirroring of the Nevada performance measures in Florida, as it did when it originally approved the Nevada measurements in Florida, the Commission should weigh the value of this consistency against the value of the modifications suggested by the CLECs. If there is no demonstrable harm created by adopting the Nevada changes in the PMP and if the benefit of any deviations from the Nevada plan is not identifiable and material to the

---

<sup>6</sup> The Commission has recognized the value of this consistency when it initially approved CenturyLink's plan, as well as when it has approved subsequent changes to the Nevada Plan for implementation in Florida.

CLECs actual operations, then CenturyLink urges the Commission to approve the Nevada changes without modification.

To assist the Commission in that effort, in the following responses to CompSouth's objections and concerns, CenturyLink offers explanations, clarifications, and some procedural concessions that should satisfy those concerns and allow the proposed PMP changes to be implemented.

### Justification of Specific Revisions

#### A. Diagnostic Metrics

CenturyLink and CLECs in Nevada agreed, in the context of settlement negotiations and as approved by the Nevada Commission, to classify several measurements as "diagnostic." This classification means that the performance results will be reported for monitoring and trending purposes only. Hence, there remains no purpose for specifying benchmarks in these cases.

Overall, the reasons for these proposals include some combination of:

- (1) There is a lack of continuing need to monitor the measurement against a benchmark;
- (2) There is already sufficient redundancy with other measurements that continue to be measured against standards;
- (3) There is no direct impact to end-user customers;
- (4) Performance levels have been exceptionally good over an extended recent period;
- (5) A parity standard is inappropriate, given that even a rebuttable presumption of discrimination is not reasonable to act upon (e.g., in "parity by design" situations); and
- (6) There are insignificant levels of CLEC activity in dimensions addressed by the measurement.

Specifically, by measurement, the above reasons apply as follows:

- Measure 1 – Average Response Time to Pre-Order Queries: Reasons (1) and (4). Please see also CenturyLink’s further response under “Measure 1” below.
- Measure 6 – Average Jeopardy Notice Interval: Reasons (1) and (2). Measuring due dates missed (via Measure 11) is a better indication of installation timeliness than simply measuring how early notices are sent regarding jeopardies. While jeopardy notices represent a dimension of interest to both CLECs and CenturyLink, applying a standard to an after-the-fact (after-the-month) reporting of performance levels provides little or no value. (Please see also the seventh paragraph of CenturyLink’s “Overall Context” comments above.)
- Measure 12 – Percent Due Dates Missed Due to Lack of Facilities and Measure 13 – Delay Order Interval to Completion Date (Lack of Facilities): Reasons (1) and (2), specifically in favor of Measure 11 – Percent Due Dates Missed, which continues to be reported against a standard.
- Measure 15 – Provisioning Trouble Reports Prior to Service Order Completion: Reasons (1) and (4). Further, by definition, “provisioning” troubles are those reported by customers while their service order is still in the process of completion, but is reported, again, after the fact. Applying a standard in such instances provides little or no benefit.
- Measure 18 – Average Completion Notice Interval: Reasons (1) and (3). In this context, it is unnecessary to do more than maintaining visibility through continued reporting.
- Measure 19 – Customer Trouble Report Rate: Reasons (1), (4), and (5). Please see also CenturyLink’s further comments under “Measure 19” below.
- Measure 20 – Percentage of Customer Trouble Not Resolved Within Estimated Time: Reasons (1) and (2) (via Measure 21).
- Measure 22 – POTS Out of Service Less than 24 Hours: Reasons (1) and (2) (via Measure 21). Please see also CenturyLink’s further comments below under “Measure 22.”
- Measure 24 – Percent Blocking on Common Trunks and Measure 25 – Percent Blocking on Interconnection Trunks: Reasons (1) and (5). In addition, interconnection trunks have reciprocal obligations to both CLECs and CenturyLink. Therefore, a standard should not be applied unless it applies to both CLECs and CenturyLink, there is value in applying a benchmark, and a valid basis for identifying the benchmark levels exists.
- Measure 26 – NXX Loaded by LERG Effective Date: Reasons (1) and (6).
- Measure 34 – Bill Accuracy: Reason (1). This measurement was already diagnostic, and there remains no material value in attempting to apply a standard. Measuring and reporting the results is sufficient for all intents and purposes.
- Measure 38 – Percent Database Accuracy: Reasons (1) and (4).
- Measure 39 – E911 MS Database Update Interval: Reasons (1) and (4).
- Measure 40 – Time to Respond to a Collocation Request and Measure 41 – Time to Provide a Collocation Arrangement: Reasons (1), (4), and (6).



CenturyLink commits to continue to post monthly data on all Diagnostic measures on its website for CLEC review. However, by definition, performance levels for Diagnostic measures are not deemed to be Compliant or Non-Compliant, and therefore these measures should not be required to trigger root-cause analyses (RCAs) reports each month. Moreover, there is no harm whatsoever in reporting these measurements as diagnostic with no set standards, particularly since CLECs and the Commission will continue to have visibility to performance levels that CenturyLink will continue to report for these measurements. Further, only two CLECs have utilized their existing online access to view these performance results in the six months prior to CenturyLink's recent filing of the revised PMP. Thus, as a practical matter, whether or not these measurements continue to be reported appears to be of little if any practical consequence to CLECs.

CenturyLink notes that, except for the EASE LSR measures that have been reporting EASE performance results against IRES benchmarks since the system conversion was made, all but one of the other measures currently proposed to be Diagnostic did not generate an RCA for 2012 results, because they satisfied any established standards. Measure 19 was the only exception, because it did generate RCAs; however, none of those instances produced any evidence of discrimination or revealed anything inconsistent with CenturyLink's proposals in the current changes. Measure 19 is addressed separately, below, as one of the measures that CompSouth opposes for the change in classification to diagnostic.

In any event, diagnostic measures have been a feature of the PMP since its inception. Measure 4, for example, was approved by the Commission as a diagnostic measure as far back as the 2002 Cookbook. Data have been continuously produced for all the submeasures in Measure 4 on an individual CLEC, aggregate CLEC, and ILEC Affiliate basis from that time forward. Changing a

measure's status to "Diagnostic" in no way harms the ability of the Commission or the CLECs to "measure performance over time to detect and correct any degradation of service provided. . ."

[Order No. PSC-03-0067-PAA-TP at p. 1]

B. Maintenance Measures

The change in maintenance measures approved by the Nevada Commission and agreed to by CenturyLink and CLECs in Nevada, is intended to exclude LNP troubles "from duplicate reporting in another service group type." [February 1, 2013 filing, CenturyLink Performance Measurement Plan, Attachment 2, Measure 19, Business Rules, Page 35]

In its comments, CompSouth appears to misunderstand the proposal. CenturyLink's proposed change is not to remove LNP trouble tickets from reporting. It is instead a clarification that one trouble ticket will not be reported twice – once as LNP and again as the product with which the LNP functionality is used. If a trouble ticket addresses an LNP trouble, it will only be included in the LNP Service Group Type.

CompSouth's proposed new LNP measurement is beyond the scope of the current filing and is unnecessary. Specifically, CompSouth's proposed new metric has nothing to do with maintenance measurements, as addressed in CenturyLink's proposal addressing LNP, but instead is an Ordering and Provisioning metric. LNP is already included in the provisioning measurements of Completion Notification and New Service Quality measures, and establishing a specific new LNP measure is unwarranted.

C. General Exclusions – Service Group Types (TRRO)

In this category, the revised Nevada PMP contains a clarification that products subject to TRRO relief should not be included in measurements of performance levels in wire centers that have been approved or accepted as being "non-impaired" for the products involved. The

rationale is that, if CenturyLink is not obligated to offer such products, whether or not it actually offers them or CLECs choose to purchase them, there is no basis for them to be subject to PMP reporting.

The FCC's Triennial Review Remand Order (TRRO) limits local exchange carrier unbundling obligations to those situations where the FCC finds competitive local exchange carriers are "impaired without access to particular network elements...." [FCC Order on Remand ("TRRO"); paragraph 2] Accordingly, CenturyLink proposes to clarify that non-impaired network elements under the TRRO are excluded from eligibility for PMP measurements. In essence, CenturyLink's proposal would continue to capture data for all products except those "non-impaired" products specifically identified by the FCC in its TRRO order (DS1 and DS3) – and only when those "non-impaired" products are ordered in non-impaired wire centers.

In response to CompSouth's concern that, "... CLECs still have the right to purchase a limited number of products even in non-impaired wire centers ...," CenturyLink's proposal does nothing to change CLECs' rights.

D. Excludable Code – "Inclement Weather"

The revised Nevada PMP's change on this topic consists of updating ordering process codes to reflect the change from IRES to EASE and to clarify that orders with codes indicating that conditions outside CenturyLink's control have impacted performance should be excluded from reported performance results. Nevertheless, upon request, raw data associated with the application of such codes will be made available.

It appears that CompSouth is mistaking the PMP's revision that makes simple updates and a clarification, as if the clarification were a new change in the much broader topic of force majeure. While "inclement weather" might be a dimension in some force majeure situations,

CenturyLink's proposal does not change or even address how force majeure conditions are or should be handled. Rather, CenturyLink's proposal is simply to clarify how a provisioning "missed appointment reason code" is applied in two measurements (Measurements 7 and 11, Average Completed Interval and Percent of Due Dates Missed, respectively, since these are the only two provisioning metrics impacted), consistent with what is common in the industry generally.

Specifically, if "inclement weather" is the "reason" or "cause" for CenturyLink missing the installation appointment for an individual provisioning order, this code is applied. If it so happens that such a situation is associated with a force majeure condition, regardless of how anyone defines force majeure, this proposal does not affect how such force majeure conditions are defined or should be handled.

Nevertheless, it has been common industry practice for decades to give technicians a way to code individual service orders with information consistent with standard categories of missed appointment reason codes to identify whether factors outside the technician's control caused an installation delay, regardless of whether it was associated with a force majeure situation. On this basis, it has been CenturyLink's practice to exclude such delayed orders, in the rare instances that they occur, from the two provisioning metrics mentioned above. This clarification was accepted by CLECs, Staff, and the Commission in Nevada, and there is no basis for disallowing it in Florida. Moreover, if a CLEC or commission staff wants to know about impacts at some point in the future, Measure 11 provides that "CenturyLink will provide a disaggregation by Missed Appointment Reason codes as diagnostic data upon raw data request." [February 1, 2013 filing, CenturyLink Performance Measurement Plan, Attachment 2, Measure 11, Notes, Page 24]

CompSouth's request for certain force majeure notification processes to be required are outside the scope of CenturyLink's Nevada PMP filing and, in any case, are not appropriate for a PMP. In addition, the CLECs have not demonstrated that anything has occurred that creates justification for additional processes in Florida different from the processes approved in Nevada.

E. Measure 1 – Pre-Order Queries

CompSouth appears to object to the portion of the Nevada PMP revisions for this measurement which change it to diagnostic and correspondingly remove the benchmark standards. The PMP revision for this measurement recognizes that, in light of the fact that it measures system performance and that performance levels are in the ranges of a few to several seconds, there is no need to apply benchmarks. It is sufficient to provide visibility to performance levels via regular reporting.

Thus, CompSouth is not correct in asserting that, "CenturyLink has not ... offered any explanation as to why the benchmark should be removed...." Rather, CenturyLink noted in the change appendix that pre-order queries occur in a matter of seconds and tracking against a specific benchmark is unnecessary. Furthermore, retaining the existing benchmarks would be inaccurate, because those benchmarks were oriented toward the performance of the IRES system and not the current EASE system. No basis has been offered by anyone to demonstrate that EASE is not the appropriate system. And, as an automated system, its query/response times are stable and not subject to the kinds of human delays that might affect CenturyLink's performance in other metrics. Nevertheless, performance can be affected by the nature of information provided by the CLEC. For instance, the time to return an Address Verification request is dependent on how many responses are available, given the information provided by the CLEC. To attempt to create a new benchmark applicable to EASE in such a context would be arbitrary

and useless. Instead, CenturyLink proposes to continue to measure and report the response times for specified pre-order queries, which will supply all the visibility to performance levels and trends that might be necessary to identify if there are problems. A new benchmark is not needed to support that purpose.

F. Measure 2 – FOC Notice Interval

For this measurement, the revised PMP updates benchmarks according to the capabilities of the EASE system.

However, CompSouth's concern focuses on a dimension of this measure that is not changing and that has been in effect since the beginning – business hours versus clock hours. CenturyLink's proposed changes for the Measure are simply to provide new benchmarks and not a change in Business Rules affecting business versus clock hours. The use of business hours has long been the standard and the benchmarks were developed consistent with this existing rule. The benchmarks in question are Electronic/Manual only. In fact, using different business rules across the measure would be confusing in understanding results. The need for manual intervention has also decreased with the EASE system, and significantly more FOC's occur as "All Electronic," which are set as either 20 or 30 minutes and are therefore less impacted by business hours.

G. Measure 7 – UNE Loops xDSL

For this measurement and product, the revised PMP replaces the current erroneous parity standard with a benchmark. The reason the current standard is erroneous is that there is no appropriate retail parity comparative to apply in evaluating parity. In other words, there is no like-for-like or equivalent retail product that can properly represent a competitive alternative for UNE Loops xDSL, if only because CenturyLink does not offer any sort of unbundled network

element to retail customers. And, where CenturyLink does offer things like high-speed internet (e.g., DSL-based products), it does not offer them in the form of separate (i.e., “unbundled”) components that can be appropriately measured individually in order to compare against UNE Loops xDSL provided to CLECs. In such cases, a benchmark is appropriate and, in this case, the parties in Nevada focused on the accepted standard interval for UNE Loops xDSL of 3 business days. Accordingly, since installation intervals for each order are measured in integral days (not fractions of days) – and because it would be inappropriate to expect 100 percent perfection by setting the benchmark equal to the standard interval – CenturyLink alternatively proposed a 4-day benchmark and the parties settled on a benchmark of 3.5 business days.

CompSouth’s request to require that “parity” be the standard ignores the reality that CenturyLink does not provide UNE Loops or comparable network elements to retail customers, as just explained. Therefore, there is simply nothing comparable to use as a parity standard for provisioning intervals, and the negotiated 3.5 business day benchmark is appropriate, in light of the 3-day standard interval.

#### H. Measure 9 – Coordinated Customer Conversions

The revised PMP removes this measurement, because volumes of CLEC requests for coordinated conversions for Res POTS, Bus POTS, and LNP are very low and competitively meaningless.

However, CompSouth’s basis for rejecting elimination of this measurement is that, “... coordinated customer conversions can ... prove to be a critical component of the CLECs relationship with a new customer.” Based on this statement of CompSouth’s position, it appears that CompSouth is raising operational concerns that CompSouth asserts “can be” “critical” and customer impacting, rather than concerns that are material to competition and relevant to the

PMP. Without agreeing or disagreeing with CompSouth's statement, CenturyLink notes that this measurement is not a real-time indicator of success or failure in coordinated conversions and does not add visibility to or data about anything for which the CLEC would not already have visibility. Moreover, the measurement does not contribute anything to the operational processes that affect or assist coordinated cutovers. Instead, the measurement is an after-the-fact collection of information, involving relatively few transactions, which is reported days or weeks after the most recent conversion captured. If a CLEC were having trouble with coordinated conversions and were concerned about customer impacts, it would work in real time with CenturyLink account management to solve actual problems on the ground. In the process, all the information needed for solving problems is available, without resorting to a delayed, after-the-fact measurement in the PMP.

I. Measure 17a – Percentage Troubles in 5 days

The revised PMP adds simple, administrative clarifications to this measurement, to which CompSouth does not object.

CompSouth's response for this measure does not address anything that CenturyLink proposes to change. Instead, CompSouth proposes a clarification that the PMP has, since its beginning, operated successfully without. Accordingly, there is no basis for CompSouth's additional proposal. More importantly, such an addition would create an unnecessary inconsistency between the Nevada and Florida PMPs that could contribute to more confusion, rather than clarity.

J. Measure 19 – Customer Trouble Report Rate

The revised PMP changes this measurement to Diagnostic for reasons described above under "A. Diagnostic Metrics."



CompSouth's reason for opposing this measurement as Diagnostic is not affected or harmed by this PMP revision. In other words, whether or not the measure is Diagnostic does not affect CenturyLink's obligation to provide nondiscriminatory service, nor will it affect whether CenturyLink fulfills that obligation.

Contrary to CompSouth's assertion that CenturyLink has not provided support for its assertion that this metric is "parity by design," CenturyLink has indeed provided that support by asserting that it uses the same network, processes, systems and technicians to build and maintain a single network that supports services provided to both CLECs and Retail customers. Stated in another way, CenturyLink does not build and maintain one network for retail customers and a separate network for CLEC customers, and no one has made a claim to the contrary. CenturyLink uses the same network in providing services to retail customers and CLECs, and the rate at which that single network ceases to work properly (as is addressed in Measure 19) for similarly situated CLECs and retail customers must also be presumed to be the same.

This being the case, no rebuttable presumption of discrimination (necessary to support employing a parity standard) exists, because one can reasonably expect that any observed disparity can be explained by situational differences among CLECs and retail customers, rather than discrimination.

K. Measure 22 – POTS Out of Service Less than 24 Hours

The revised PMP better aligns this measurement with its intent, as described in its title, relative to the focus on "POTS" products. UNE-Loops Non-Designed are removed from the "Measurable Standard," because they are not POTS.

However, CompSouth appears to misunderstand this PMP improvement, because it believes a new metric is required in order to preserve reporting for UNE Loops Non-designed. Instead, as just explained, the PMP's change in Measure 22 is to make the reporting consistent with the title of the measure. CompSouth's proposal for a new Metric for UNE Loops Out of Service Less than 24 Hours simply is not necessary because, as noted in the Change Appendix, that data is already available for that product in Measure 21 in the Average Time to Restore. Furthermore, UNE Loops are included in the Trouble Rate Metric (Measure 19) and the Percentage of Customer Trouble Not Resolved Within Estimated Time (Measure 20). These metrics provide sufficient data to track UNE Loops out of service without the creation of an additional metric.

#### Conclusion

For the reasons explained under each of the topics above, and in light of (1) CenturyLink's commitment to continue to report diagnostic measurements on its website for CLECs and Staff to access, and (2) the fact that no harm has been shown to exist if the Nevada revisions to the PMP are implemented in Florida, CenturyLink believes that the Commission has ample justification to approve the revised PMP as recently approved in Nevada.

Respectfully submitted this 4<sup>th</sup> day of April 2013.

/s/ Susan S. Masterton  
Susan S. Masterton  
Senior Corporate Counsel  
CenturyLink  
315 S. Calhoun Street, Suite 500  
Tallahassee, FL 32301  
850-599-1560  
850-224-0794 (fax)  
Susan.Masterton@centurylink.com