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# Public Service Commission

January 18, 2002

**VIA AIRBORNE EXPRESS**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW - TW-A325  
Washington, DC 20554

**Re:** CC Docket No. 01-318, Performance Measurements and Standards for Unbundled Network Elements and Interconnection  
CC Docket No. 98-56, Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance  
CC Docket No. 98-147, Deployment of Wireline Services Offering Advanced Telecommunications Capability  
CC Docket Nos. 98-147, 96-98, 98-141, Petition of Association for Local Telecommunications Services for Declaratory Ruling

Dear Ms. Salas:

Enclosed are an original and 15 copies of the comments of the Florida Public Service Commission in response to the Notice of Proposed Rulemaking (NPRM) regarding national performance measurements and standards for unbundled network elements and interconnection in the above dockets.

Please date stamp and return one copy in the enclosed envelope.

Sincerely,

Cynthia B. Miller, Esquire  
Office of Federal and Legislative Liaison

CBM:tf  
Enclosures

cc: Janice Myles, Common Carrier Bureau, with diskette  
Qualex International, with diskette  
Service List, without attachments  
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Florida Public Service Commission  
CC Docket No. 01-318 et al  
January 18, 2002

## **SUMMARY OF FLORIDA PUBLIC SERVICE COMMISSION COMMENTS**

In summary, while we do not recommend a highly prescriptive national approach for wholesale measurements and standards, we acknowledge that some degree of harmonization might be useful in order to have some basic level of consistency across the states. A set of broad minimum federal requirements, which states may augment and fine-tune to meet their particular needs, would be workable in our view. Such an approach would ensure that any national standards do not supplant the exacting efforts of the FPSC and other state commissions. In addition, any national standards should merely serve as one factor in determining compliance with the Telecommunications Act of 1996, and enforcement of any national standards should be performed by the FCC.

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Performance Measurements and Standards for Unbundled Network Elements and Interconnection	)	CC Docket No. 01-318
	)	
Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance	)	CC Docket No. 98-56
	)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147
	)	
Petition of Association for Local Telecommunications Services for Declaratory Ruling	)	CC Docket Nos. 98-147, 96-98, 98-141
	)	

**COMMENTS OF THE FLORIDA PUBLIC SERVICE COMMISSION**

The Florida Public Service Commission (FPSC) would like to address specific aspects of the Notice of Proposed Rulemaking (NPRM) in the above referenced dockets, which was released on November 19, 2001. In particular, we will offer our recommendations with respect to the issue of harmonizing state and national measurements and standards. Also, the FPSC has conducted an extensive proceeding on wholesale service quality measurements and standards, which addressed the majority of the issues raised in the NPRM. We are enclosing a copy of our order from this proceeding and attaching copies of information sheets (which are similar in format to the template provided in the Appendix to the NPRM) on specific measurements and standards that have been ordered by the FPSC.<sup>1</sup>

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<sup>1</sup> Docket No. 000121-TP, Order No. PSC-01-1819-FOF-TP, Issued September 10, 2001  
(<http://www.psc.state.fl.us/psc/dockets/index.cfm?event=TransferFile&thisFileSize=890534&thisFileName=01%2D1819%2Dord%2Ewpd&thisFile=01%5C11248%2D01%5C01%2D1819%2Eord>)

While we agree with the FCC's statement of authority (¶ 14), we respectfully request the FCC to consider the work the FPSC and other states have done, before exercising that authority. We believe that any national standards designed to encompass all incumbent local exchange companies (ILECs) might only represent the lowest common denominator of available standards. Consequently, as will be explained below, any national standards should not supplant the exacting efforts of the FPSC and the other state commissions.

On the desirability of harmonizing state and national measurements and standards (¶ 15-20), we do not recommend a highly prescriptive approach, although we acknowledge that some degree of harmonization might be useful in order to have a basic consistency across the various states. From a practical perspective, we question the feasibility of having one national system. Even within the state of Florida, we are not attempting to establish one system for all ILECs. There is variability in the operations support systems and processes used by the various ILECs, which means that, at a minimum, the business rules may need to vary between ILECs. While we believe that the wholesale service quality measurements and standards for the Florida ILECs should be similar, we do not envision that they should be identical across ILECs since there are differences between companies in how functionally similar systems measure processes.

As we continue to transition towards a more competitive environment, we believe it would be a mistake to establish a set of measurements and standards which have the effect of requiring system uniformity across ILECs for purposes of performing the pre-ordering, ordering, provisioning, maintenance and repair, and billing functions. This view is consistent with the FCC's goals "to rationalize the multiple regulatory requirements, and thereby not increase incumbent carriers' regulatory burdens." ¶ 16

Notwithstanding these caveats, we believe that a set of minimum federal requirements, which states may augment and fine-tune to address ILEC specific issues, would be workable and would assist in setting a floor for wholesale service quality in the local market. This concept of a wholesale service quality floor may well assist competitive local exchange companies (CLECs) in their business planning, by reducing one element of uncertainty. In addition, a set of minimum federal requirements may be helpful to states that are early in the process and could provide a point of departure for such state level proceedings. Also, some states could even elect to use the federal minimums as a default, thereby avoiding the time and expense of a proceeding.

On the issue of “whether national measurements and standards should establish compliance with the Act’s requirements standing alone or should be merely one factor in our review” (¶ 19), we believe that wholesale measurements and standards should be just one factor in determining compliance. In concept, we believe that measurements and standards can only address how well functions are being performed. Measurements and standards cannot address whether the required wholesale offerings are being made available, or whether the applicable prices and conditions of service are compliant with governing law.

The possibility of a joint federal-state task force is discussed in ¶ 19 of the NPRM. Assuming the FCC proposes to move forward with national standards, we believe that a joint federal-state task force could be useful, if conducted at a broad, conceptual level. States which have implemented performance plans can provide guidance on underlying issues associated with the process.

In ¶ 21 of the NPRM, the FCC seeks comment as to whether the Commission should use its available enforcement mechanisms to enforce any national measurements and standards it might adopt. To the extent that the FCC adopts national measurements and standards, then national

enforcement of those measurements and standards is vitally important. The FPSC believes that the FCC should use all available enforcement mechanisms to enforce any national measurements and standards.

The FPSC has ordered metrics that are conceptually similar to ten of the twelve metrics proposed by the FCC, as shown below.

<b>FCC Proposed Metrics</b>	<b>FPSC Ordered Comparable Metrics</b>
OSS Pre-Order Interface Response Timeliness	Average Response Time & Response Interval
Order Notifier Timeliness	Firm Order Confirmation Timeliness, Reject Interval
Order Completion Notifier Timeliness	Average Completion Notice Interval
Percent of Jeopardies	Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices
Percent On Time Performance	None
Average Delay Days on Missed Installation Appointments	None
Installation Quality	Percent Provisioning Troubles within 30 days
Percent Missed Appointments	Percent Missed Installation Appointments
Open Orders in Hold Status	Mean Held Order Interval & Distribution Intervals
Trouble Report Rate	Customer Trouble Report Rate
Repeat Trouble Rate	Percent Repeat Troubles within 30 Days
Time to Restore	Maintenance Average Duration

The attached information sheets (which are similar in format to the template provided in the Appendix to the NPRM) detail the above-noted metrics, exclusions, business rules, levels of disaggregation, and standards ordered by the FPSC.

In addition, the FPSC has approved approximately 60 other metrics. The complete list of approved Florida metrics is provided in the enclosed FPSC order on Attachment 2, page 25, and is offered to the FCC for consideration. The FPSC's efforts have included development of metrics in such areas as Operator Services and Directory Assistance, Database Update, E911, Trunk Group Performance, Collocation, and Change Management. While the FPSC understands the need for the FCC to limit the number of metrics it seeks to establish, the FPSC believes the consideration of these additional 60 metrics has merit.

In summary, while we do not recommend a highly prescriptive national approach for wholesale measurements and standards, we acknowledge that some degree of harmonization might be useful in order to have some basic level of consistency across the states. A set of broad minimum federal requirements, which states may augment and fine-tune to meet their particular needs, would be workable in our view. Such an approach would ensure that any national standards do not supplant the exacting efforts of the FPSC and other state commissions. In addition, any national standards should merely serve as one factor in determining compliance with the Telecommunications Act of 1996, and enforcement of any national standards should be performed by the FCC.

Respectfully submitted,

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DATED: January 18, 2002

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