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BEFORE THE PUBLIC SERVICE COMMISSION OF FLORIDA

In re: Petition of Competitive)
Carriers for Commission action)
to support local competition in)
BellSouth Telecommunications,)
Inc.'s service territory.)
_____)

Docket No. 981834-TP

In re: Consideration of BellSouth)
Telecommunications, Inc.'s entry)
into interLATA services pursuant)
to Section 271 of the Federal)
Telecommunications Act of 1996.)
_____)

Docket No. 960786-TL

Filed: October 29, 1999

Comments of MGC Communications, Inc.
Regarding Proposed OSS Testing Metrics

MGC Communications, Inc. ("MGC") hereby submits its comments regarding the proposed OSS testing performance measures or metrics.

Introduction

MGC provides local service to small business and residential customers in Florida, Georgia, California, Nevada, and Illinois. In Florida, MGC has mostly small business customers. MGC installs its own switch, collocates in the central offices of the incumbent local exchange carrier ("ILEC"), and leases loops and transport from BellSouth or other carriers.

Recommendations

The proposed measurements are very detailed and are relatively inclusive. MGC has no comments or requested modifications to the form and content of the measurements proposed.

MGC would, however, propose two (2) additional categories in the Provisioning Measurements area. Because these categories have been of continuing concern to MGC, it is hoped that they can be added to the testing.

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2 _____
- MAS 3 _____
- OPC _____
- PAI _____
- SEC 1 _____
- WAW _____
- OTH _____

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

PROPOSED MEASUREMENTS FOR OSS MASTER TEST PLAN

The first area of concern relates to customers that experience service-affecting problems prior to service order completion. An example of this is when a customer order is MA'd (a Missed Appointment) or PF'd (Pending Facilities) and the Disconnect order is worked prematurely. MGC customers have experienced a loss of dialtone, and MGC has had to contact BellSouth Provisioning to get the customer's service restored. MGC does not know whether BellSouth has a process in place to track problems on orders that have not been completed or whether a trouble ticket can currently be placed on a pending order, however, MGC would suggest the following measurement:

Measurement - Provisioning Trouble Reports (prior to Service Order Completion)

Definition - Measures the percent of troubles that are reported (via customer or indirectly by CLEC) that occur during the Provisioning process.

Business Rules - Trouble must be reported to Provisioning and tracked with a trouble report.

Exclusions - Any CLEC caused problems.
Any CPE caused trouble.

Calculation - (Number of trouble reports that occur from the time of service order creation, up to and including the date of the service order completion) / (Total numbers of service orders in reporting period)

Report Structure - CLEC specific, CLEC aggregate, and BST aggregate.

Benchmark - No retail analog for this measurement because it measures cutting loops to the CLEC.

The second concern is in the area of Coordinated Hot Cuts (CHC). MGC has requested cuts after 5 p.m. and has had customers cut over in the middle of the day or not at all. This is an extremely significant issue for MGC because it affects approximately 25-30% of orders on a weekly basis. MGC would propose the following measurement for Coordinated Cuts:

Measurement - Coordinated Customer Conversion as a Percentage On-Time

Definition - Measures the percentage of coordinated orders (CHC) completed on time* for all orders where CLEC has requested coordination (including PNP).

**Note: "On time" means within 1 hour of committed order due time*

Business Rules - Applies to CLEC requested coordinated orders only (including Number Portability orders where coordination is requested by CLEC).
CLEC must input "Y" in the CHC field and designate a requested time.

Exclusions - Any CLEC or End User caused misses.

Calculation - (Number of coordinated orders completed by due date and time) / (count if coordinated orders completed in reporting period) x 100.

Report Structure - CLEC specific, CLEC aggregate, and BST aggregate.

Benchmark - No retail analog for this measurement because it measures cutting loops to the CLEC.

Conclusion

MGC recommends that the BellSouth OSS testing performance measures include the two additional measures outlined in these comments:

1. Provisioning Trouble Reports (prior to Service Order Completion); and
2. Coordinated Customer Conversion as a Percentage On-Time.

Respectfully submitted this 18th day of November, 1998.

MGC COMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that I have this day served true and correct copies of the Comments of MGC Communications, Inc. Regarding Proposed OSS Testing Metrics, in Docket Nos. 981834-TP and 960786-TL, upon the following persons by sending copies thereof, first class mail, postage prepaid, to the last known addresses of:

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Dated this 18 day of November, 1999.

A handwritten signature in cursive script that reads "Dee Prince". The signature is written in black ink and is positioned above a horizontal line.

Dee Prince, an employee of MGC Communications, Inc.