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RECORDS AND REPORTING

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April 28, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 000121-TP (OSS)

Dear Ms. Bayo:

Enclosed is an original and fifteen (15) copies of Sprint's Comments on Staff's Procedural Proposal which we ask that you file in the captioned matter.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

Susan S. Masterton
Attorney

None Enclosures

AFA	_____
APP	_____
CAF	_____
CMU	<u>2</u> _____
CTR	_____
EAG	_____
LEG	<u>1</u> _____
MAS	_____
OPC	_____
PRR	_____
SEC	<u>1</u> _____
WAW	_____
OTH	_____

cc: Parties of Record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Investigation into the establishment of)	
operations support systems permanent)	
performance measures for incumbent)	Docket No. 000121 - TP
local exchange telecommunications)	
companies.)	

COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P.
 AND SPRINT FLORIDA, INCORPORATED
ON STAFF'S PROCEDURAL PROPOSAL

The Florida Public Service Commission (Commission) opened this docket to explore the development of performance metrics, performance measurements and monitoring programs of wholesale services provided by ILEC to ALECs. Sprint Communications Company L.P. and Sprint Florida, Incorporated (collectively, Sprint) wholeheartedly agree with the Commission's desire to ensure that ILECs provide high quality service to wholesale customers.

Sprint supports the balanced approach offered by the Commission Staff's Initial Proposal. The Proposal appears to work toward company specific plans that would demonstrate that incumbent ILECs are providing access and interconnection to ALECs in a nondiscriminatory manner. The Proposal also recognizes the need for carriers to utilize information and systems already developed for other jurisdictions. Finally, Sprint would like to make recommendations/changes to the list of interim Florida metrics listed in Staff's Initial Proposal.

Advocating flexibility among companies in the development of performance plans should not be misinterpreted as an abandonment of the fundamental belief that performance measures for ILECs and holding ILECs

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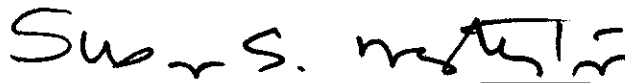
accountable for high quality, non-discriminatory service to ALECs is vitally important to the development of effective competition. Sprint's position simply recognizes that companies are different and a single, "one-size fits all" approach is not the best way to achieve the desired end. This has been recognized in Staff's Initial Proposal which allows each ILEC to develop and file a detailed performance plan that is comprehensive, consistent with LCUG standards, and fashioned to fit the ILEC's circumstances. Sprint agrees that the Commission should direct its attention first to BellSouth and then other carriers. In addition to some of the stated reasons above, the Commission will need to evaluate Bell South's plan with a greater magnitude based on the implications of an eventual 271 filing. Sprint agrees that a carrier can develop a performance plan in the interim, and nothing should preclude any ILEC from implementing a voluntary, self-effectuating program.

As both an ILEC and competitive service provider, Sprint internally must determine what level of measurements it chooses to support. There needs to be a balance between the benefit of an ILEC proving that they are providing parity service and the cost associated with such a plan. Sprint would like to caution the Commission Staff against mandating the use of several repetitive measurements that provide little additional benefit but substantially increase cost. Sprint is attaching a redline version of the metrics included in Staff's Initial Proposal. The stricken metrics are believed to be duplicative in that the information has already been captured in another metric.

Sprint believes that fair plans that balance the needs of the information required, and the costs of developing such plans, can be developed within the general framework of Staff's Initial Proposal. These plans should provide an environment that allows ALECs a meaningful opportunity to compete and allows ILECs to implement these plans as effectively as possible. Sprint appreciates the opportunity to present its views and looks forward to participating in upcoming workshops and/or hearings in this docket.

Respectfully submitted this 28th day of April, 2000.

Sprint Florida, Incorporated

A handwritten signature in black ink that reads "Susan S. Masterton". The signature is written in a cursive style and is positioned above a horizontal line.

Susan S. Masterton
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Pre-Ordering – OSS	<ol style="list-style-type: none"> 1. Average OSS Response Time and Response Interval 2. OSS Interface Availability
Ordering	<ol style="list-style-type: none"> 1. Percent Flow-through Service Requests (Summary) 2. Percent Flow-through Service Requests (Detail) (no need for two measures, Sprint combines into single) 3. Flow-through Error Analysis 4. Percent Rejected Service Requests 5. Reject Interval 6. Firm Order Confirmation Timeliness 7. Speed of Answer in Ordering Center
Provisioning	<ol style="list-style-type: none"> 1. Mean Held Order Interval & Distribution Intervals 2. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices 3. Percent Missed Installation Appointments 4. Average Completion Interval & Order Completion Interval Distribution 5. Average Completion Notice Interval 6. Coordinated Customer Conversions 7. Percent Provisioning Troubles w/i 30 X days (should be X days to accommodate specific operations) 8. Total Service Order Cycle Time
Maintenance & Repair	<ol style="list-style-type: none"> 1. Missed Repair Appointments 2. Customer Trouble Report Rate 3. Maintenance Average Duration 4. Percent Repeat Troubles w/i 30 days) 5. Out of Service > 24 Hours 6. OSS Interface Availability 7. OSS Response Interval and Percentages 8. Average Answer Time - Repair Centers
Billing	<ol style="list-style-type: none"> 1. Invoice Accuracy 2. Mean Time to Deliver Invoices 3. Usage Data Delivery Accuracy 4. Usage Data Delivery Completeness 5. Usage Data Delivery Timeliness 6. Mean Time to Deliver Usage
Operator Services (Toll) and Directory Assistance	<ol style="list-style-type: none"> 1. Average Speed to Answer (Toll) 2. Percent Answered within "x" Seconds (Toll) 3. Average Speed to Answer (DA) 4. Percent Answered within "x" Seconds (DA) <p>(The above measures are parity by design. If branding is required, terms should be negotiated via contract.)</p>
E911	<ol style="list-style-type: none"> 1. Timeliness 2. Accuracy 3. Mean Interval
Trunk Group Performance	<ol style="list-style-type: none"> 1. Trunk Group Service Report 2. Trunk Group Service Detail
Collocation	<ol style="list-style-type: none"> 1. Average Response Time 2. Average Arrangement Time 3. % of Due Dates Missed

In addition to the metrics listed above, Commission staff will consider the 17 additional metrics listed below. These metrics are also a part of the Interim Performance Metrics approved by the Commission for purposes of OSS testing: —

1. ~~Percent Service Loss from Early and Late Cuts~~
2. ~~Percent of Hot Cuts Not Working When Initially Provisioned~~
3. Percent Completions or Attempt without Notice or with Less than 24 Hours Notice
4. Percent Order Accuracy
5. ~~Percent of Orders Canceled or Supplemented at the Request of BellSouth ILECs do not request cancellations.~~
6. Percent and Timeliness of EDI and TAG LSR Acknowledgments
7. Provisioning Troubles Prior to Loop Acceptance
8. Percent Orders Canceled After Missed Due Date
9. Percent Found OK/Test OK/CPE (Only needed when service out of parity.)
10. ALEC Center Call Abandonment Rate
11. Average Notification of Interface/OSS Outage
12. Percent of Change Management Notices and Documentation Sent on Time
13. ~~Percent of Software Certification Failures and Software Problem Resolution~~
14. ~~Percent Billing Errors Corrected in X days~~
15. ~~Loop Make-up Information Timeliness~~
16. ~~Provisioning Trouble Reports Prior to Service Order Completion~~
17. Coordinated Customer Conversions as a Percentage On-Time.

CERTIFICATE OF SERVICE
DOCKET NO. 000121-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or hand-delivery this 28th day of April, 2000 to the following:

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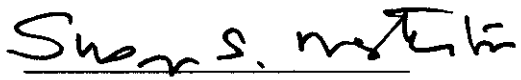
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