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December 4, 2002

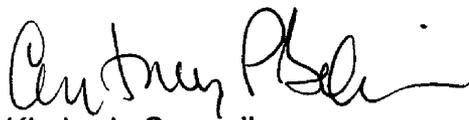
Ms. Blanca S. Bayo, Director
Division of Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121C-TP
Investigation into the establishment of operations support systems permanent
performance measures for incumbent local exchange telecommunications
companies (Verizon Florida track)

Dear Ms. Bayo:

Please find enclosed an original and 15 copies of Verizon Florida Inc.'s Comments on
Staff's Proposal for Verizon Performance Measurement Plan for filing in the above
matter. Service has been made as indicated on the Certificate of Service. If there are
any questions regarding this matter, please contact me at (813) 483-2617.

Sincerely,


Kimberly Caswell

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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 (Verizon Florida track))
Docket No. 000121C-TP
Filed: December 4, 2002

**VERIZON FLORIDA INC.'S COMMENTS ON STAFF'S PROPOSAL FOR
VERIZON PERFORMANCE MEASUREMENT PLAN**

Verizon Florida Inc. (Verizon) files its Comments on the Commission Staff's Proposal for Verizon Performance Measurement Plan (Staff Proposal), dated November 15, 2002. These Comments focus on three aspects of the Staff Proposal: (1) Staff's addition of seven service quality measures to Verizon's proposed plan; (2) Staff's recommendation for Verizon to report results on the fifteenth day of each month; and (3) Staff's recommendation that the Performance Measurement Plan take effect 30 days after Commission approval. Verizon will discuss, in addition, the general matter of ongoing revisions to the Plan.

SERVICE QUALITY MEASURES. The Florida Carrier-to-Carrier Guidelines and Performance Standards Verizon proposed in this Docket contained seventeen service quality measures. Staff's proposal, however, would add seven new measures to Verizon's seventeen. (See Staff Proposal, Att. A.) Considering the sub-measures included in Staff's proposed measures, Staff's proposal would increase the items measured from 157 to 209, an increase in detail of more than 30%. This significant additional level of detail is unnecessary.

Verizon disagrees with Staff's stated belief that the "breadth and depth" of Verizon's proposed measures "would not adequately provide coverage sufficient to

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comprehensively assess OSS performance.” (Staff Proposal at 2.) Verizon’s proposed measures are the same ones the FCC requires Verizon to report as a condition of the GTE/Bell Atlantic merger. They address all unbundled network elements (UNEs), resale and local interconnection services that alternative local exchange carriers (ALECs) purchase from Verizon. Measurements are reported for all key transaction areas, including pre-ordering, ordering, provisioning, maintenance, network performance and billing.

Staff has not explained why it believes Verizon’s proposed measures are insufficient to gauge OSS performance. Based on the past comments of the Commission, an important objective of any performance plan is simplicity. An unduly complex OSS plan is difficult for Verizon to administer and difficult for the Commission and the industry to monitor and understand. The plan’s goal should be to directly address all the key OSS performance areas without unnecessary levels of detail. Verizon’s proposed measures satisfy this objective. Staff has offered no rationale to support its proposed new measures, so there is no reason to add them to the Plan.

Indeed, the suggested additional measures “Average Completed Interval” and “Percentage of Orders Jeopardized” are just extensions of the “Completed Within 5 Days” and “Missed Due Dates” measures already in the Plan. It is not necessary to measure the time to complete orders and missed due dates with four metrics when two are adequate to demonstrate non-discriminatory access to OSS systems.

The “NXX Updates,” “Center Responsiveness” and “E911/911 MS Database Updates” measures Staff proposes are, likewise, not useful for evaluating non-discriminatory OSS access. These activities are performed, for the most part, within

processes that do not differentiate the ALEC from Verizon, so the suggested measures would yield no additional, unique data about Verizon's treatment of ALECs.

Staff's proposed addition of the "Usage Timeliness" measure will not provide significant, additional data to the "Timeliness of Carrier Bill" measure already included in Verizon's plan.

Finally, the "Invoice Accuracy" measure proposed by Staff is flawed, as well as unnecessary. This metric reflects the total amount of dollars adjusted to ALECs as a result of billing errors in the reporting month, regardless of when the ALEC submitted the claim for the error or in what month the error occurred. The denominator includes the current charges billed to the ALECs in the reporting month. This means the credits reported in the month do not relate to the charges billed in that month and could, in fact, relate to multiple months being compared to a single month's charges, or to an error from several months ago that has already been corrected. Based on industry consensus, similar, flawed metrics have been eliminated in other states.

Once again, Verizon's proposed plan addresses the key areas of Verizon's performance in providing non-discriminatory access to OSS. Adding measures that have no proven value, and that aren't supported by any rationale, simply makes the Plan more complex and difficult to use.

TIMEFRAME FOR PERFORMANCE REPORTS. Staff has recommended that the Commission approve adoption of performance data and report parameters "consistent with Verizon's present practices as state-ordered in California practices and FCC-ordered for other former GTE states." (Staff Proposal at 3.) Staff notes that "[p]erformance reports will be provided to the ALECs and the Commission by the

fifteenth calendar day of the month succeeding the reporting period.” (Staff Proposal at 3.)

Verizon believes there may be a misunderstanding with regard to reporting timeframes elsewhere. Staff has recommended approval of the FCC’s reporting mechanism and statistical analysis. But the FCC requires Verizon, except where noted otherwise, to report performance metrics and analysis on the *twenty-fifth day* of the calendar month succeeding the reporting period—not the fifteenth day, as Staff recommends. This period is necessary to provide the statistical analysis required in the FCC reports. Because Staff’s intention was apparently to maintain consistency with FCC-ordered practices, Verizon asks Staff to revise its recommendation to allow Verizon to file performance data and statistical analysis on the twenty-fifth day of the calendar month succeeding the reporting period.. Verizon cannot provide all the data the FCC requires by the fifteenth of the month. The production of reports is a complex process requiring data from source systems, sometimes from manual sources, and processing through Verizon’s data warehouse. Verizon must also perform quality assurance to ensure that the correct data files are provided and that data is complete and accurate. Reporting on the twenty-fifth day of the month is consistent with Verizon’s reporting to a multitude of states—with some states even later than the twenty-fifth to allow for load balancing.

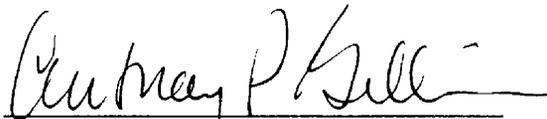
PLAN EFFECTIVE DATE. Staff recommends that the Performance Measurement plan should take effect within thirty days of the Commission’s Order approving the plan. (Staff Proposal at 5.) This recommendation does not take into consideration that the performance plan is keyed to complete data months. If, for

instance, the Commission issues its Order approving the plan on January 13, then the Plan would need to take effect February 13, requiring Verizon to launch the Plan in the middle of a data month. This would be incompatible with the very nature of the plan. The statistical analysis and reporting system Staff has recommended assumes a full month of data. To accommodate the requirement of a full month of data and to assure adequate time for implementation (which will require programming and testing to ensure accurate and compliant web-based reporting specific to Verizon's Florida operations) Verizon requests a Plan effective date of the first full month 90 days after the Commission's final order. Thus, if the Commission approved the Plan on January 13, the Plan would be in effect with reporting of the May data month.

IMPLEMENTATION OF PLAN CHANGES. As the Staff knows, the Plan that is the basis of the Staff's recommendation is the result of an ongoing process of collaboration among carriers and Commissions across the country. As telecommunications services and processes continue to evolve, the plan will need to change accordingly. Indeed, such changes are made on a regular basis today as a part of the continuing industry collaboration on OSS performance standards. Verizon thus proposes that Staff clarify that industry-agreed changes to the Plan may be flowed through automatically, upon 30 days advance notice to the Commission and all affected carriers. This is the most efficient process for both ILECs and ALECs and will ensure the industry in Florida quickly receives the benefits of the most recent updates to the Plan.

Verizon urges the Commission to approve Staff's recommended Performance Measurement Plan, with the changes Verizon suggests in these Comments.

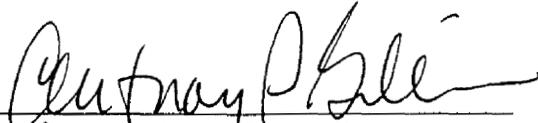
Respectfully submitted on December 4, 2002.

By: 
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Attorney for Verizon Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Comments on Staff's Proposal for Verizon Performance Measurement Plan in Docket No. 000121C-TP were sent via U.S. mail on December 4, 2002 to the parties on the attached list.


for Kimberly Caswell

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