

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of CLEC Coalition [AT&T Communications of the Southern States, LLC, DIECA Communications, Inc., d/b/a Covad Communications Company, ITC^DeltaCom Communications, Inc., MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc.] for Development of a process to evaluate BellSouth Telecommunications, Inc.'s Compliance with the 50/50 plan, a Portion of the Change Management Process.

Docket No. 031072-TL

Filed: October 22, 2004

CLEC COALITION'S POST-MEETING COMMENTS

The CLEC Coalition (AT&T Communications of the Southern States, LLC, DIECA Communications, Inc., d/b/a Covad Communications Company, ITC^DeltaCom Communications, Inc., and MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc.) files its Post-Meeting Comments.

1. On October 12, 2004, the Staff of the Commission facilitated a meeting among the parties to this docket to review the results of the Price Waterhouse Coopers' (PwC) attestation reports. The CLEC Coalition had numerous questions regarding the PwC materials submitted by BellSouth Telecommunications, Inc. (BellSouth) on July 15, 2004, particularly Attachments B and C. The meeting resulted in an open and informative exchange of ideas and information.

2. At the conclusion of the meeting, the CLECs agreed to reduce to writing their understanding of the agreements reached at the meeting as well as their remaining concerns. The CLECs request that the Florida Staff confirm its intent to pursue the items

listed below agreed to by BellSouth to ensure that BellSouth has remedied the failure points identified in PWC's report.

3. It is the CLECs' understanding that as a result of the October 12th meeting, BellSouth will provide the Florida Commission Staff with the following documentation for its review:

a. The BellSouth proprietary Subject Matter Expert (SME) training manual.

The Commission Staff will review the training manual to ensure that the following items are appropriately addressed:

1. Instructions on how change requests (CRs) are to be correctly categorized;
2. Instructions on the unit sizing process for maintenance items;
3. Instructions that future comparisons of vendor hours will be done prior to the release of Appendix I;
4. Instructions on how initial unit sizing estimates from various application teams are to be aggregated accurately and completely;
5. Review the new District level approval process on unit sizing.

b. The Harvest system application training document and the system administrative guide. The Commission Staff will review the training document to ensure that the following items are appropriately addressed:

1. Determination if the Harvest training document includes instructions requiring each SME to enter a full explanation of the CLEC impact and impact on category assignment;
2. Determination if the system administrative document addresses the security problems identified in the PwC report and have been included in the process document.

4. In addition, the CLECs have the following concerns that BellSouth has not yet adequately addressed:

- a. BellSouth should change the Harvest edits so that the "CLEC affecting" field in Harvest does not allow the SME to advance to the next screen unless the "CLEC affecting" field has been completed;

- b. BellSouth should provide to the Commission Staff documentation regarding the Project Management “replan” process. BellSouth should review the “Package Manager” template and provide it to the Commission Staff. The Staff should ensure that instructions in the “replan” process advise project managers to make sure that all defects are put on unit sizing estimate-sizing forms.
 - c. BellSouth should continue to assess unit size changes during the development life cycle of the release. BellSouth should be required to conduct an “end of release” comprehensive analysis to identify where variances have occurred. A post analysis will enable BellSouth to:
 - 1. Identify where most variances occur in the development cycle and then develop a plan to address how to improve the input/output in that phase in the cycle;
 - 2. Determine what types of CRs consistently fall out of unit sizing and then perform an analysis to determine where the sizing failures exist, i.e., is a BellSouth SME or the vendor failing to size correctly;
 - 3. Determine what areas of the vendor/BellSouth methodology on sizing can be refined or what benchmark data should be revisited.
 - d. BellSouth should be required to reduce the trigger point by which it reviews unit sizing variances during the development cycle. The current 20% increase/decrease in unit sizing is too high as a trigger point during the development cycle. It should be revised to between 10-15%. In the recommended post analysis process, the CLECs suggest the unit sizing variance should be no greater than 20%.
5. The CLECs look forward to continuing to work with Staff and BellSouth to resolve these remaining items.

S/ Vicki Gordon-Kaufman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing CLEC Coalition's Post-Meeting Comments has been provided by (*) electronic mail and U.S. Mail this 22nd day of October 2004, to the following:

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