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December 1, 2006

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

Re: Docket No. 000121A-TP
In Re: Investigation into the establishment of operations support systems permanent incumbent local exchange Telecommunications companies

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Responses to Workshop Action Items Nos. 9 and 13. A copy of the same is being provided to all parties of record.

Sincerely,

Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix
James Meza, III

659842

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 1st day of December, 2006 to the following:

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(+) Signed Protective Agreement

#502166

REQUEST: BellSouth may provide data supporting the variability around the reported results for the retail analog measures that do not use the truncated z methodology to determine nondiscrimination.

RESPONSE: Two important facts need to be established before a solution for how to incorporate variability for dispensation can be addressed.

First, just as there is variability in retail processes for measures that use the truncated z test, there is also variability in retail processes for measures that cannot use the truncated z statistical test. Second, the reason that the truncated z statistical test is not used on the measures listed in section C.2 of the SEEM plan is because a method of assigning transactions to cells (which is essential to a truncated z test) has never been developed and not because either party desires to refrain from using the truncated z test on these measures. Also, the fact that the truncated z test is not used does not mean that variability does not exist in the processes. Rather, it is because a definitive testing methodology has not been developed, nor is it clear that one could be developed.

Where the truncated z test is used there is some attempt (e.g. through use of delta) to prevent the normal variability that occurs in any process from resulting in SEEM payments. Inexplicably, such recognition does not exist for retail analog measures that cannot use the truncated z test (or for benchmarks, but that is not the subject of this exercise) even though such recognition is just as necessary. This fact is obvious in the charts that follow. BellSouth will use OSS-1 M&R data for the LMOSUPD system to demonstrate that the problem exists, but all of the measures in section C.2 exhibit the same need.

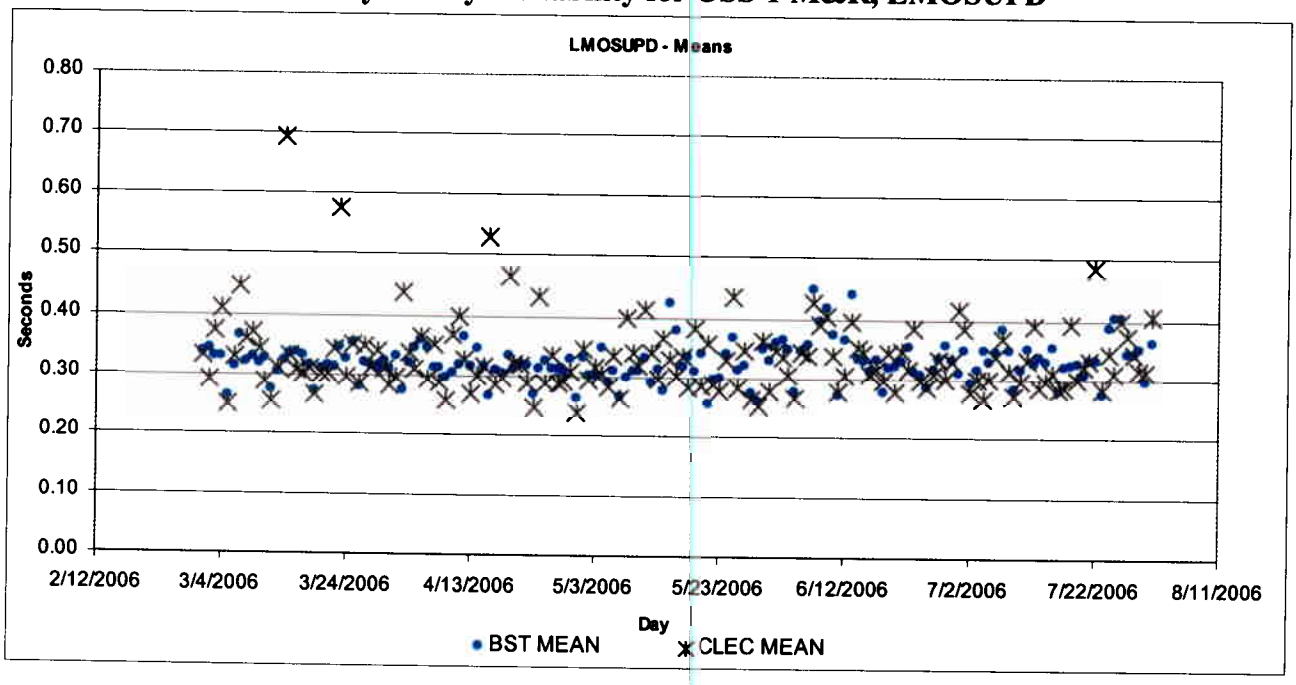
1. There is a basic process variability **among individual observations**. BellSouth obtained 5 months of raw data for OSS-1 M&R. The volumes of individual observations were so overwhelming that a meaningful graph, using all the data, could not be constructed. However, BellSouth developed daily summaries that listed each day's average time, minimum observation, maximum observation and standard deviation and displayed those values on chart 9.1.
2. Chart 9.1 also shows that there is **variability** in how the process performs **from day to day**. It is also intuitive that there is a random variation within and between BellSouth and the CLECs' performance from day to day. Chart 9.2 shows the day to day variability better.

Chart 9.1 Data Values: Day-to-Day Variability for OSS-1 M&R, LMOSUPD

TRANS_DATE	BST MIN_DUR	BST MAX_DUR	BST DEVIATION	BST MEAN	BST COUNT	CLEC MIN_DUR	CLEC MAX_DUR	CLEC DEVIATION	CLEC MEAN	CLEC COUNT
070906	0.14	5.35	0.21	0.28	7,924.00	0.15	3.84	0.26	0.27	384.00
071006	0.13	133.61	0.94	0.32	34,180.00	0.14	12.22	0.35	0.30	3,342.00
071106	0.13	499.05	3.11	0.35	31,440.00	0.14	58.42	1.36	0.33	2,959.00
071206	0.12	252.63	1.81	0.33	30,185.00	0.14	198.66	3.91	0.39	2,788.00
071306	0.11	304.56	2.66	0.34	29,701.00	0.14	3.57	0.23	0.29	2,743.00
071406	0.12	312.33	2.18	0.33	29,164.00	0.14	14.70	0.43	0.30	2,627.00
071506	0.14	110.66	1.23	0.36	18,609.00	0.16	11.08	0.36	0.31	976.00
071606	0.14	49.61	0.62	0.28	10,670.00	0.14	3.79	0.27	0.28	448.00
071706	0.10	166.14	1.45	0.32	36,739.00	0.14	18.50	0.42	0.29	3,538.00
071806	0.09	94.24	1.12	0.32	32,183.00	0.14	211.19	3.89	0.39	3,165.00
071906	0.13	90.98	1.21	0.33	31,559.00	0.14	9.16	0.31	0.30	2,922.00
072006	0.13	141.78	0.97	0.31	31,947.00	0.14	58.19	1.38	0.32	2,826.00
072106	0.11	421.28	2.67	0.33	30,104.00	0.08	66.34	1.57	0.33	2,641.00
072206	0.11	179.33	1.46	0.33	21,738.00	0.14	101.91	4.13	0.48	1,062.00
072306	0.14	26.94	0.35	0.27	14,070.00	0.14	3.41	0.22	0.28	556.00
072406	0.08	1,340.68	6.77	0.39	41,914.00	0.12	46.70	1.05	0.34	3,825.00
072506	0.12	2,468.31	13.06	0.40	35,837.00	0.14	56.76	1.07	0.31	3,168.00
072606	0.13	1,942.05	10.76	0.41	32,955.00	0.14	94.06	2.48	0.40	2,989.00
072706	0.09	182.08	1.52	0.34	31,104.00	0.12	173.67	3.27	0.37	2,902.00
072806	0.11	65.98	0.87	0.34	30,086.00	0.14	77.19	1.57	0.34	2,639.00
072906	0.13	101.55	1.00	0.35	18,292.00	0.15	3.68	0.22	0.32	1,076.00
073006	0.14	250.34	2.40	0.30	10,927.00	0.18	22.66	1.01	0.31	503.00
073106	0.13	148.19	1.44	0.36	38,755.00	0.14	178.22	3.36	0.41	3,248.00

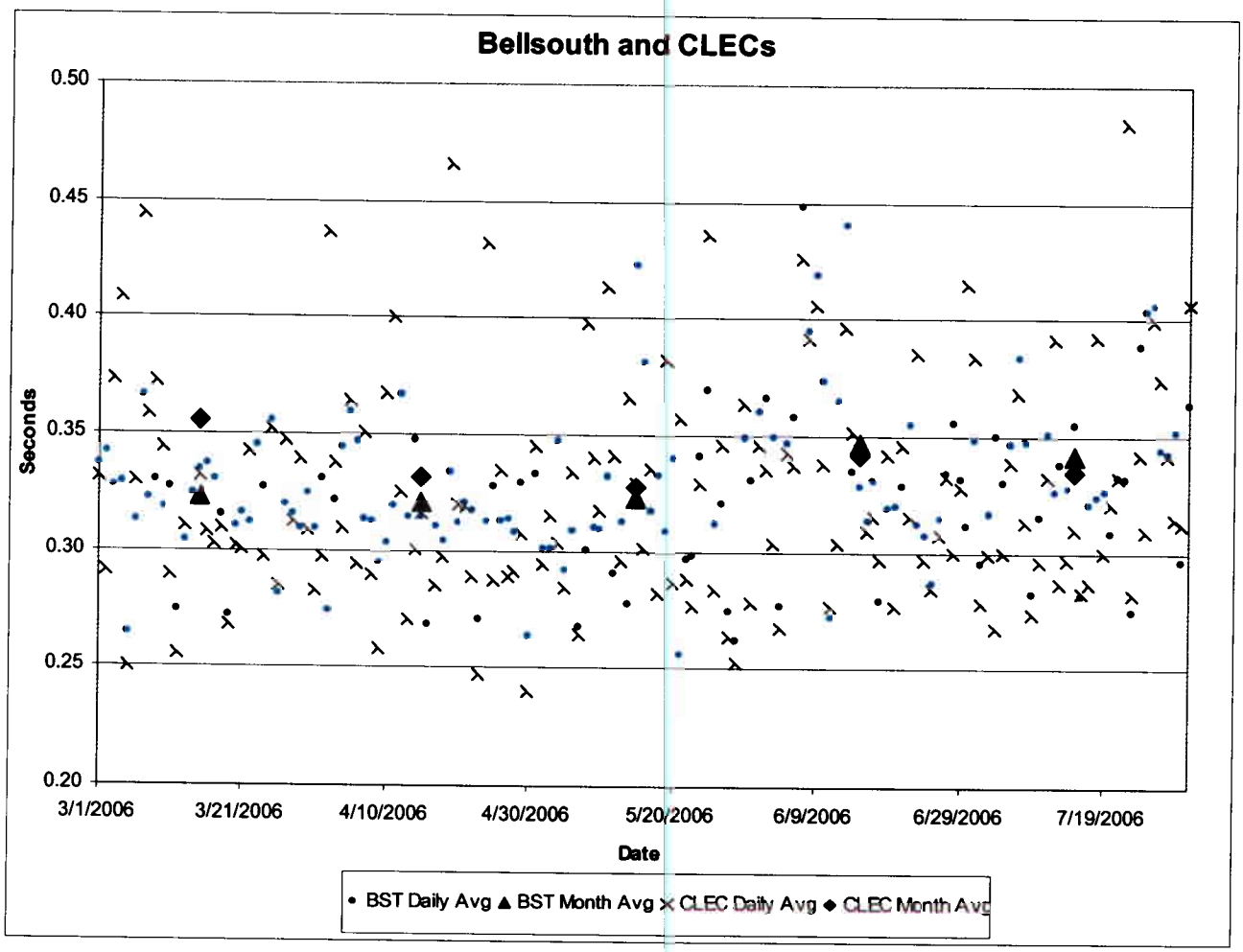
The above results are some of the data plotted on a graph in Chart 9.2 below. This graph clearly shows the day to day variability and shows that the results cluster around one value. In any process it is reasonable to expect some minor variability from the norm just as this graph shows. There is no reason to attribute this normal variability to differences in the processes as is currently done in the SEEM plan.

Chart 9.2 Scatter Plot: Day-to-Day Variability for OSS-1 M&R, LMOSUPD



There is also variability **from month-to-month** as well as the variability within each month's average performance. Chart 9.3 superimposes these monthly values over the daily averages data shown in Chart 9.2.

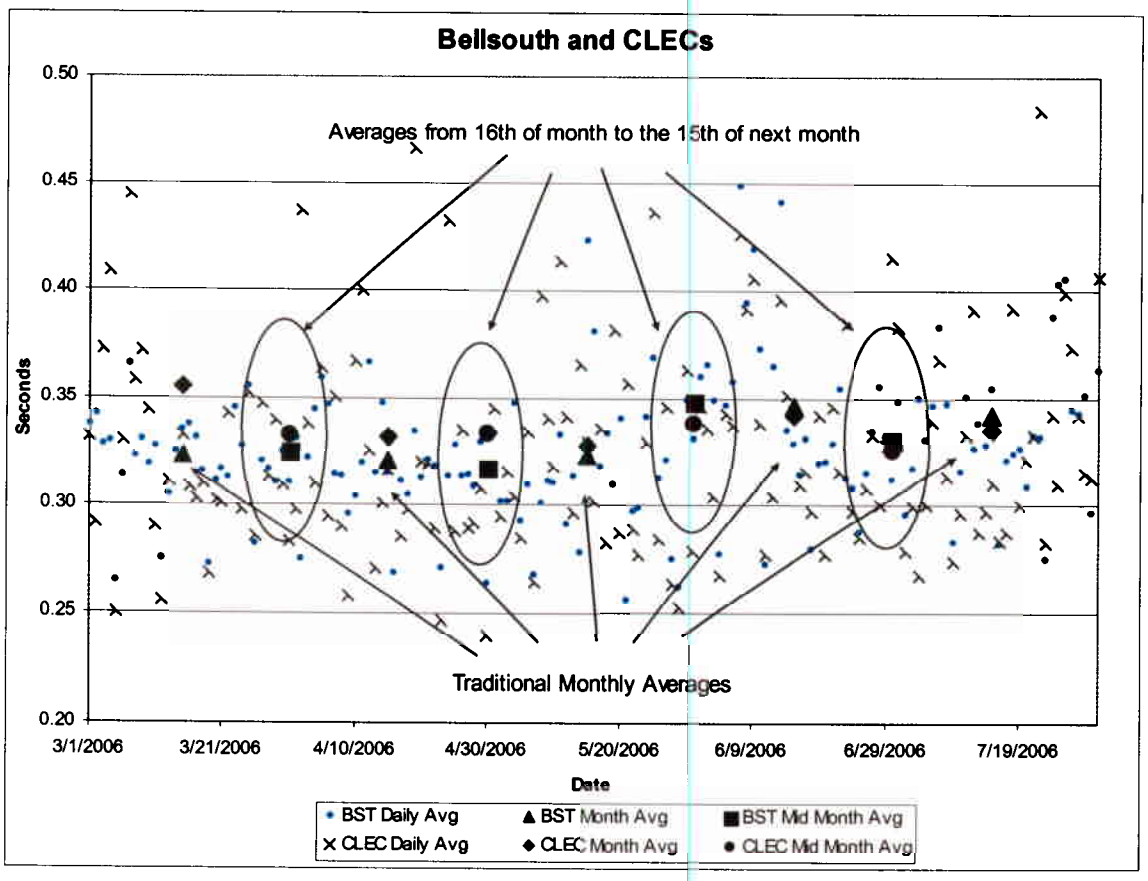
Chart 9.3 Scatter Plot: Month-to-Month Variability for OSS-1 M&R, LMOSUPD



It is easy to see, from the previous charts, that there is variability in the process.

Another way to solidify this idea is to look at the exact same data in different time segments and see if the results would be the same. The data is displayed in a manner to facilitate this analysis in Chart 9.4 below.

Chart 9.4



If the processes did not have variability then the results should be exactly the same no matter how the time units were divided. Thus, in addition to looking at the monthly averages, Chart 9.4 also looks at the averages of the data from the 16th of the month until the 15th of the next month. Note that the values are not the same as the standard monthly values, and yet each set of averages uses all of the data collected. The reason the averages do not match up is because the underlying process has variability in it.

Problem: Clearly, there can be no further doubt that substantial variability exists. Consequently, the problem has been narrowed down to the single issue of how to best account for this normal variability in the processes such that it is much less likely to result in SEEM payments.

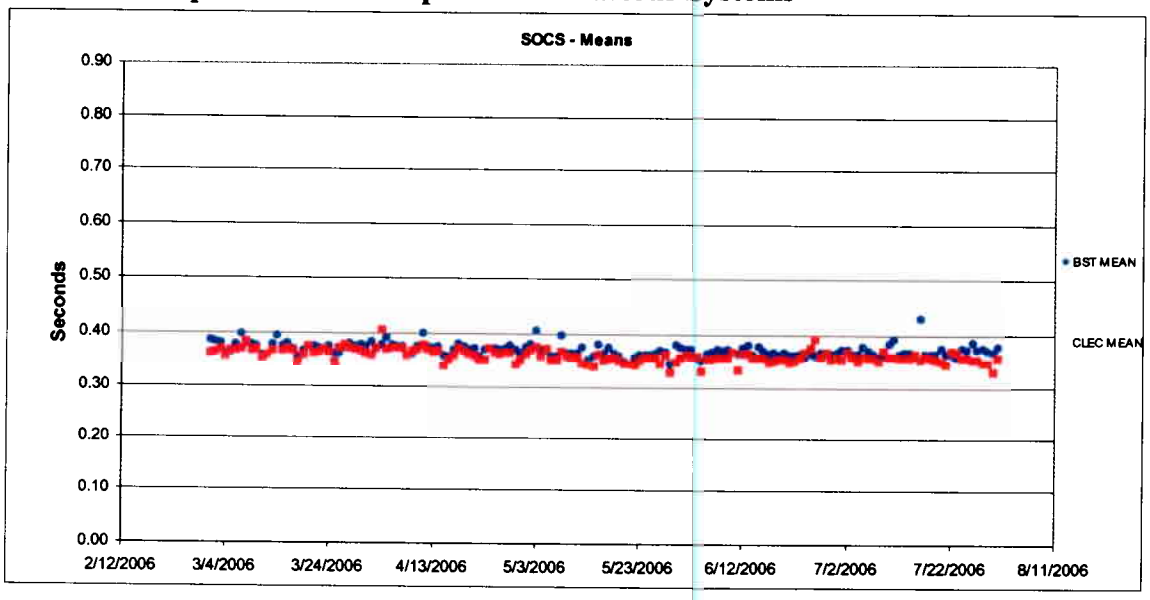
There are many different ways to address the issue of variability in these processes. However, the method BellSouth chose was to establish a variability factor based on business judgment, which is the same basis used to define materiality parameters where the truncated z test is used. The degree of permissible variability was defined to allow an

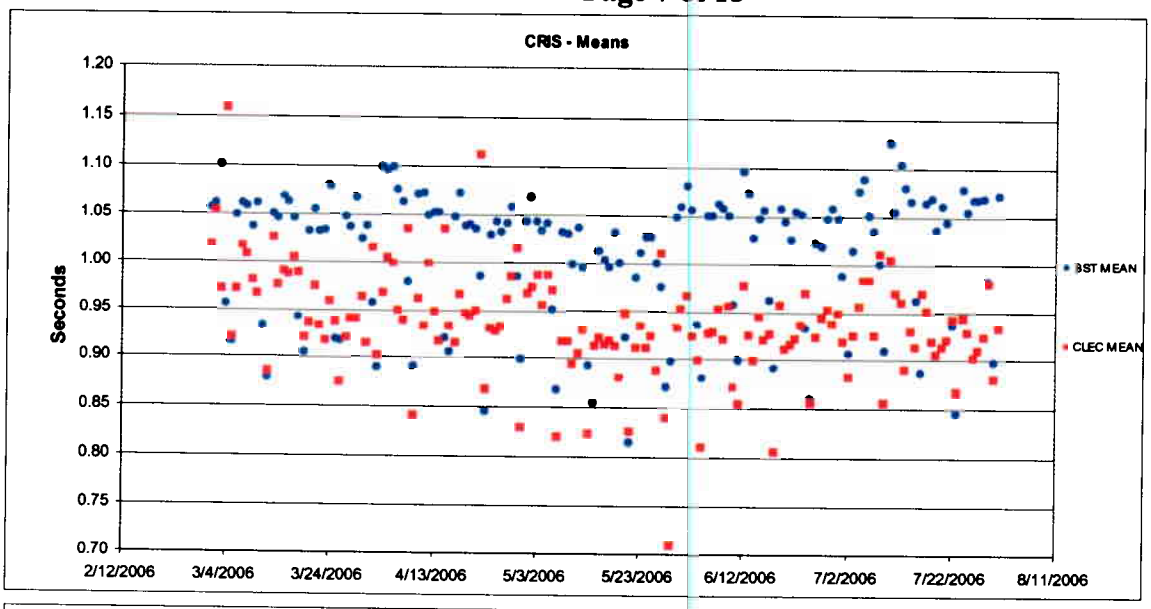
efficient CLEC to have a meaningful opportunity to compete and supported by historical data.

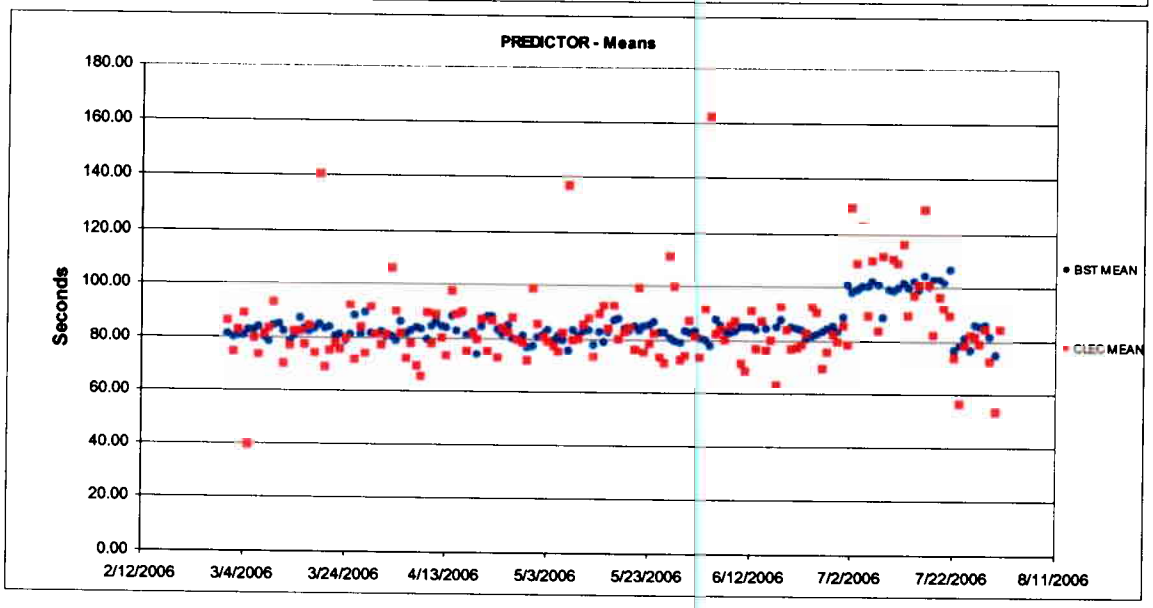
Another method that was considered was to recalculate a variability factor over time. However, an exact application of that method would cause problems with data retention as well as using an excess of computing time and resources. Thus, a constant factor was determined. Further, a more simplistic proposal based on that approach was rejected by Staff and the CLECs in the last SQM/SEEM review.

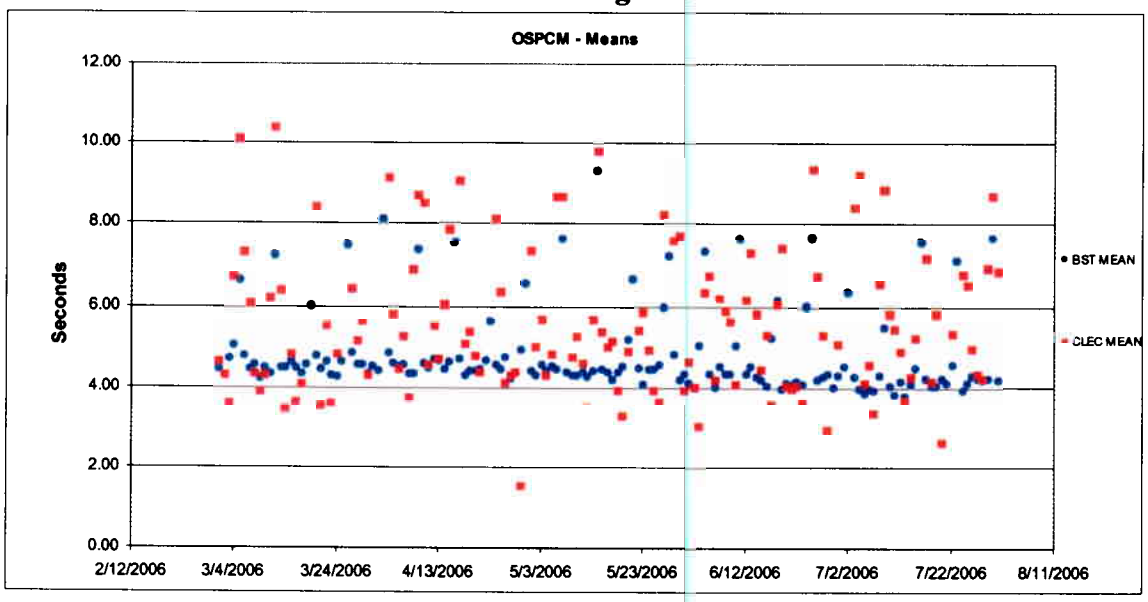
Note that in OSS-1 for Preordering measures, a 'plus' factor of 2 seconds is already factored into the SQM. If M&R is made into a mean measure then at a minimum the same 'plus' factor of 2 seconds would naturally extend to the new calculations. While some systems have very short response times like LMOSUPD, SOCS and CRIS others like PREDICTOR, OSPCM, MARCH, and DLR have longer response times on the order of several seconds to a couple of minutes(Charts 9.5).

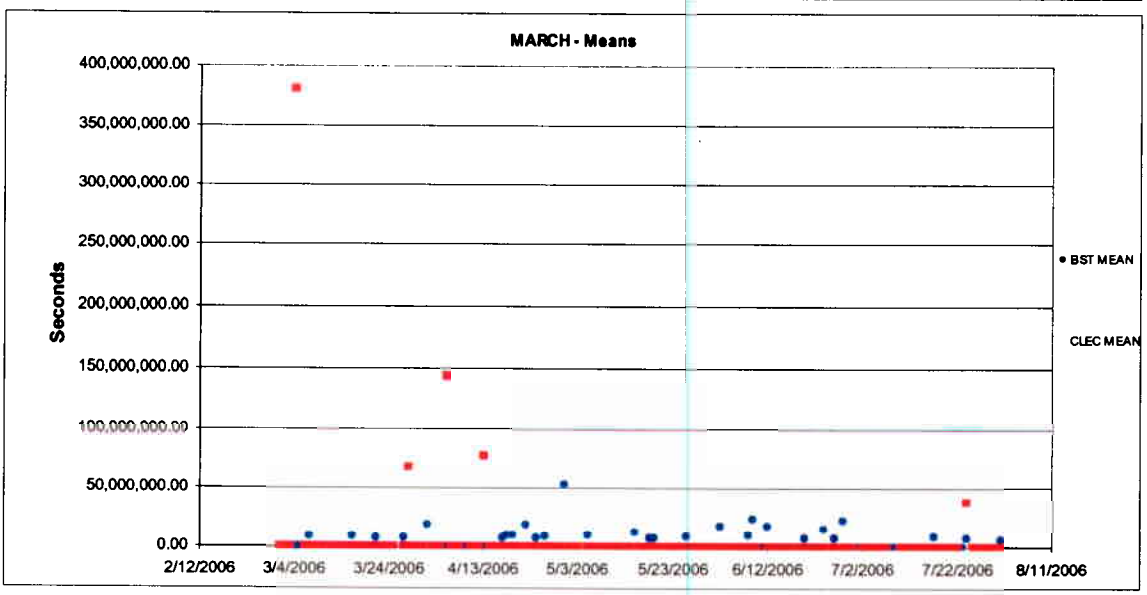
Chart 9.5 Response Time Comparisons – Various Systems

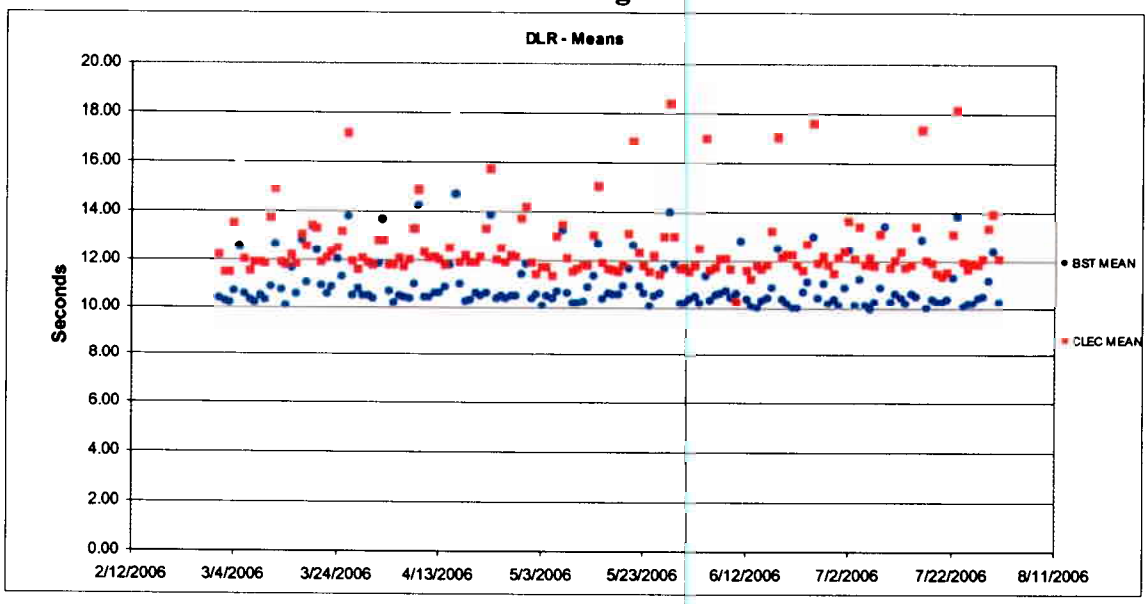



CRIS - Means
Seconds
1.20
1.15
1.10
1.05
1.00
0.95
0.90
0.85
0.80
0.75
0.70
2/12/2006
3/4/2006
3/24/2006
4/13/2006
5/3/2006
5/23/2006
6/12/2006
7/2/2006
7/22/2006
8/11/2006
BST MEAN
CLEC MEAN


PREDICTOR - Means
Seconds
180.00
160.00
140.00
120.00
100.00
80.00
60.00
40.00
20.00
0.00
2/12/2006
3/4/2006
3/24/2006
4/13/2006
5/3/2006
5/23/2006
6/12/2006
7/2/2006
7/22/2006
8/11/2006
BST MEAN
CLEC MEAN


OSPCM - Means
Seconds
12.00
10.00
8.00
6.00
4.00
2.00
0.00
2/12/2006
3/4/2006
3/24/2006
4/13/2006
5/3/2006
5/23/2006
6/12/2006
7/2/2006
7/22/2006
8/11/2006
BST MEAN
CLEC MEAN


MARCH - Means
Seconds
400,000,000.00
350,000,000.00
300,000,000.00
250,000,000.00
200,000,000.00
150,000,000.00
100,000,000.00
50,000,000.00
0.00
2/12/2006
3/4/2006
3/24/2006
4/13/2006
5/3/2006
5/23/2006
6/12/2006
7/2/2006
7/22/2006
8/11/2006
BST MEAN
CLEC MEAN



Regardless of the manner in which the data is observed, BellSouth's variability, CLEC variability or the variability in the differences, once all different systems' performances are taken into account, a variability factor of 2 seconds seems reasonable.

BellSouth would be willing to discuss the possibility of using a different factor for each system's results, but believes that updating that factor outside of an annual review would be cumbersome.

Speed of Answer

In the chart below (Chart 9.6a) the variability in the process from month to month is obvious. However, since the data trended downward over time the best method to get an estimate of the process measure's variability over time is to observe the difference in BellSouth and CLEC performance over time. Chart 9.6b shows these differences. Both of these charts' data are exhibited in seconds.

Chart 9.6a

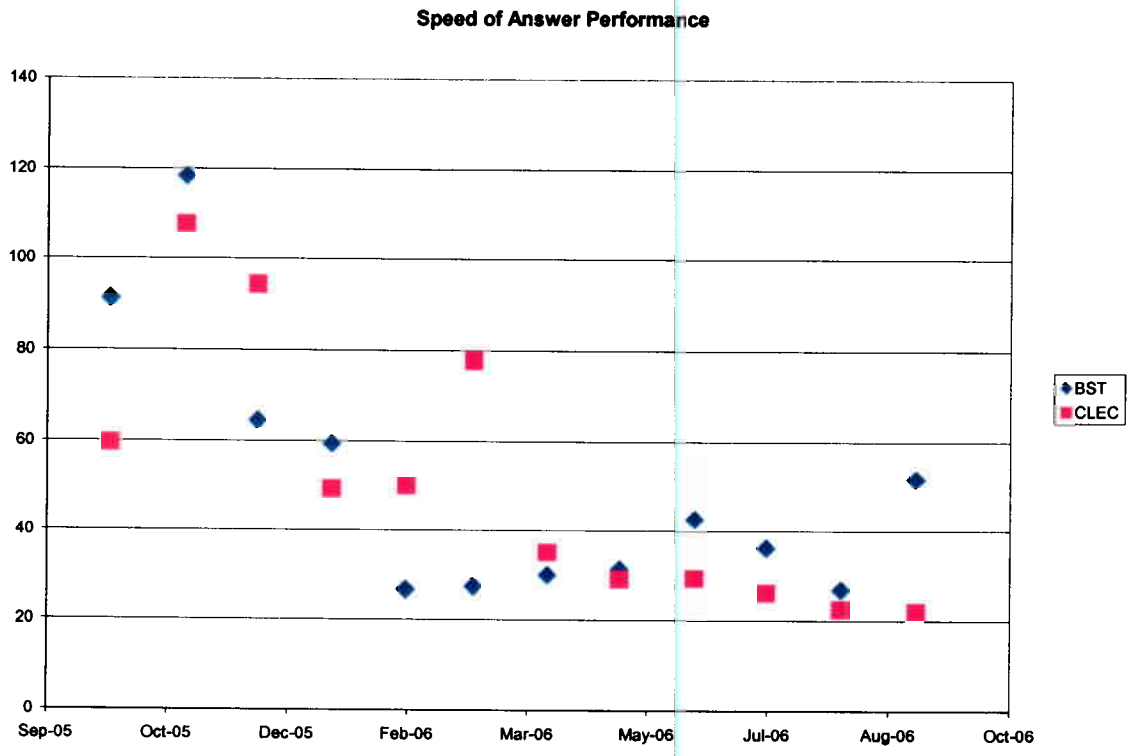
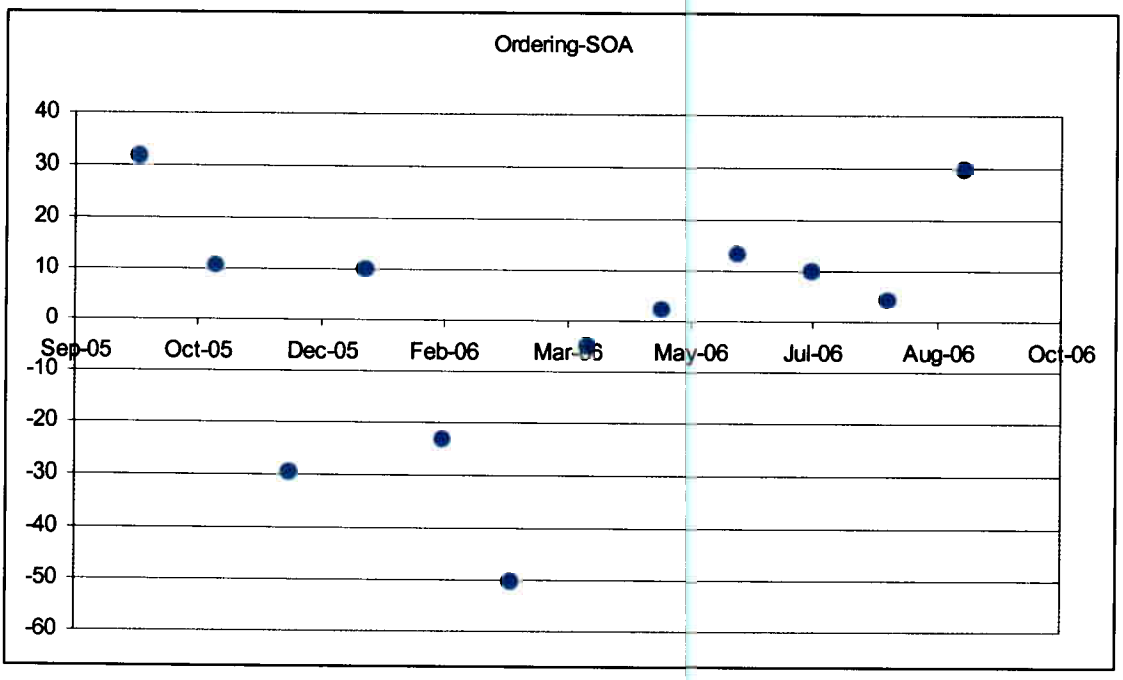


Chart 9.6b



This process does not appear to be favoring BellSouth or the CLECs and yet, BellSouth is paying remedies for what is simply normal variability in the process. BellSouth has proposed a variability factor of 5 seconds (waiting for about two additional rings before the phone is answered) to help prevent such unwarranted payments.

Billing Invoice Accuracy

BIA is another example of a process having variability but not being able to use the truncated z methodology.

BIA must have a variability factor in these calculations. The exact same BellSouth performance data is compared with 3 different subsets of CLEC performance data (Charts 9.7, 9.8, 9.9). They cannot all be identical processes to BellSouth's overall process. Yet BellSouth does not have an exact duplicative process for each of the CLEC's processes. This alone will introduce variation into the calculations.

The chart below (Chart 9.7a) shows the BIA resale comparisons. Chart 9.7b has the same data displayed with lines added to show the 2 standard deviation control limits on the process. The average moving range was used to estimate BellSouth's process variance. The control limits are then calculated from BellSouth's overall process mean.

The idea is to use BellSouth's standard deviation and test whether the CLEC's performance measure (average or proportion) is within a certain number of standard deviations from BellSouth's performance. This has support considering that the standard deviation in the SQM and SEEM plans are based on the "modified Z" statistic (Appendix E of SQM and section D.1 of SEEM plans), which uses BellSouth's process variability as the basis for calculating the variation in the differences of the BellSouth and CLEC performance measures.

Note that none of the CLEC's average performance is outside of 2 sigma limits of BellSouth's process for itself. Yet BellSouth has paid for two failed months based on the stare-and-compare approach used in the current SEEM plan.

Chart 9.7a

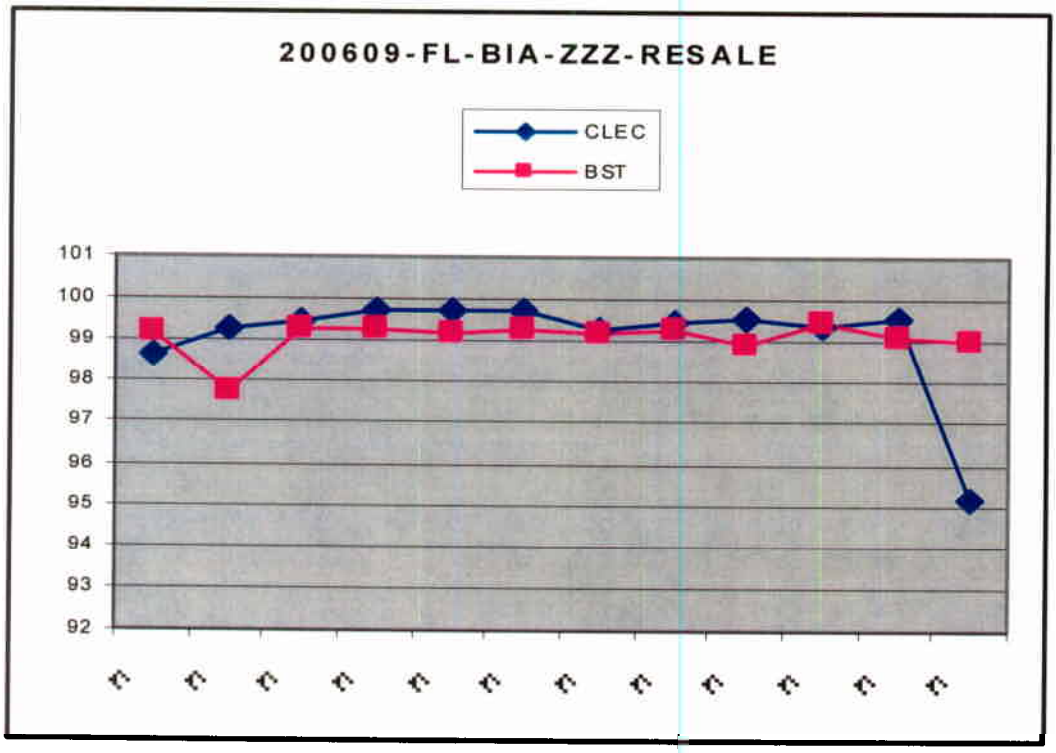
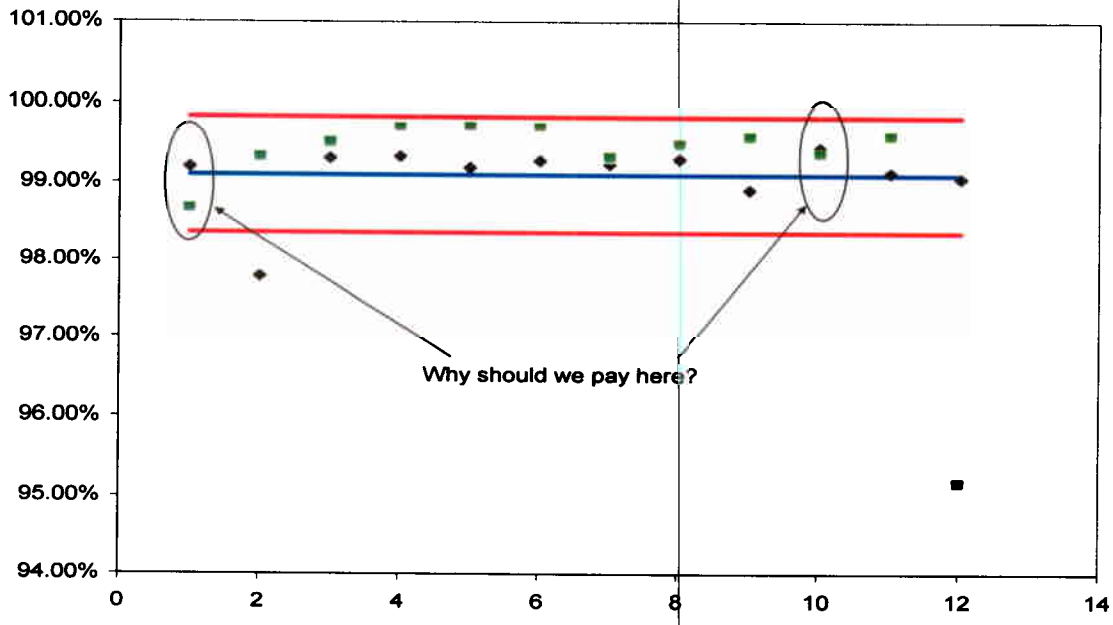


Chart 9.7b



Another viable approach is to find the variation in the differences of the BellSouth and CLEC performance measures. Chart 9.7c depicts the standard deviation of the differences and measured two (2) standard deviations in either direction from the expected difference of zero. Note that once again, using the stare-and-compare methodology in place under the current plan, BellSouth pays for two instances that should not be considered unusual in the process.

Chart 9.7c

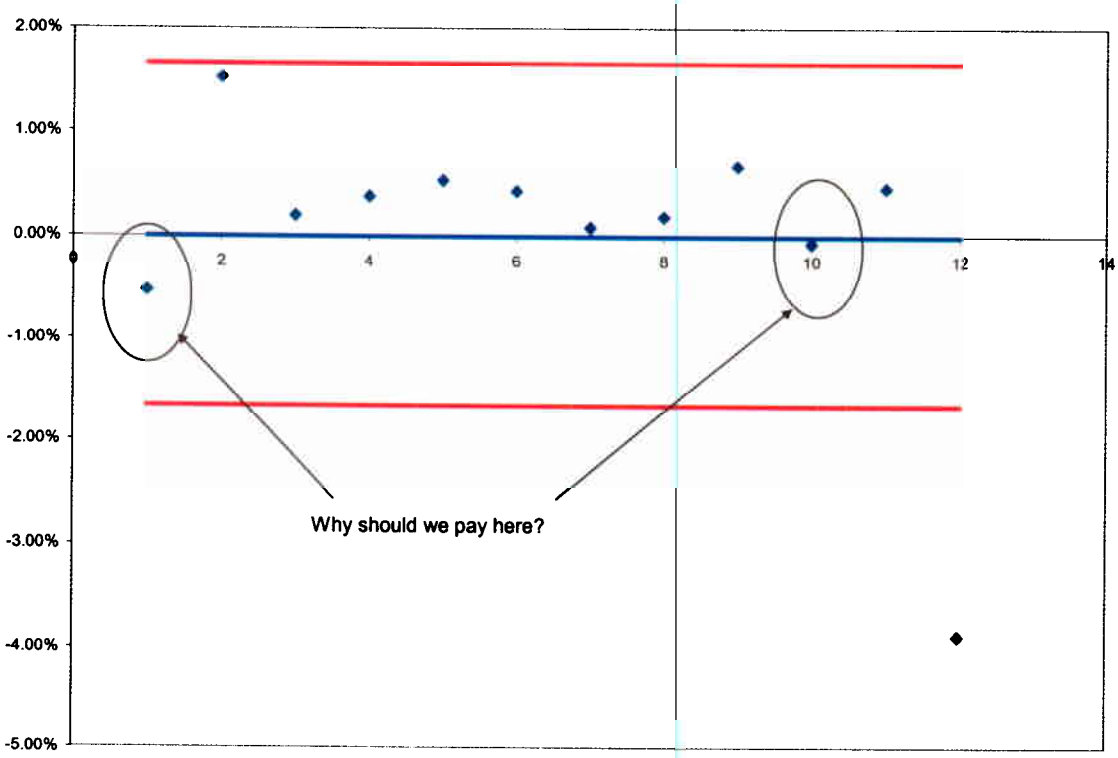


Chart 9.8

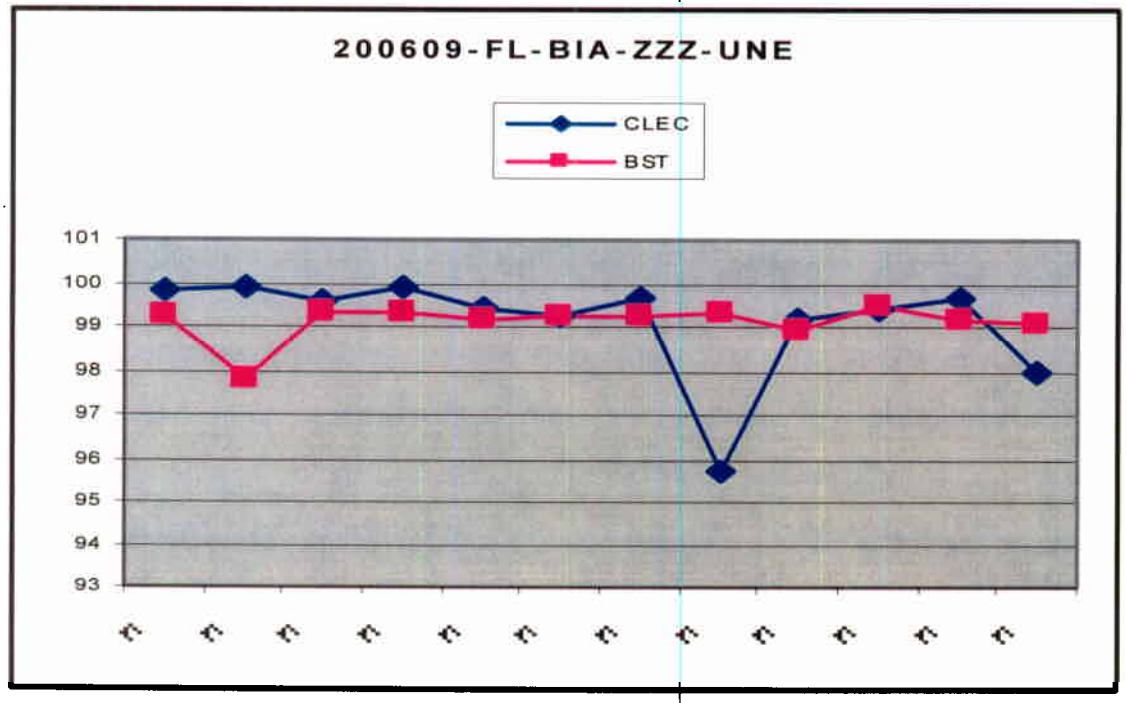
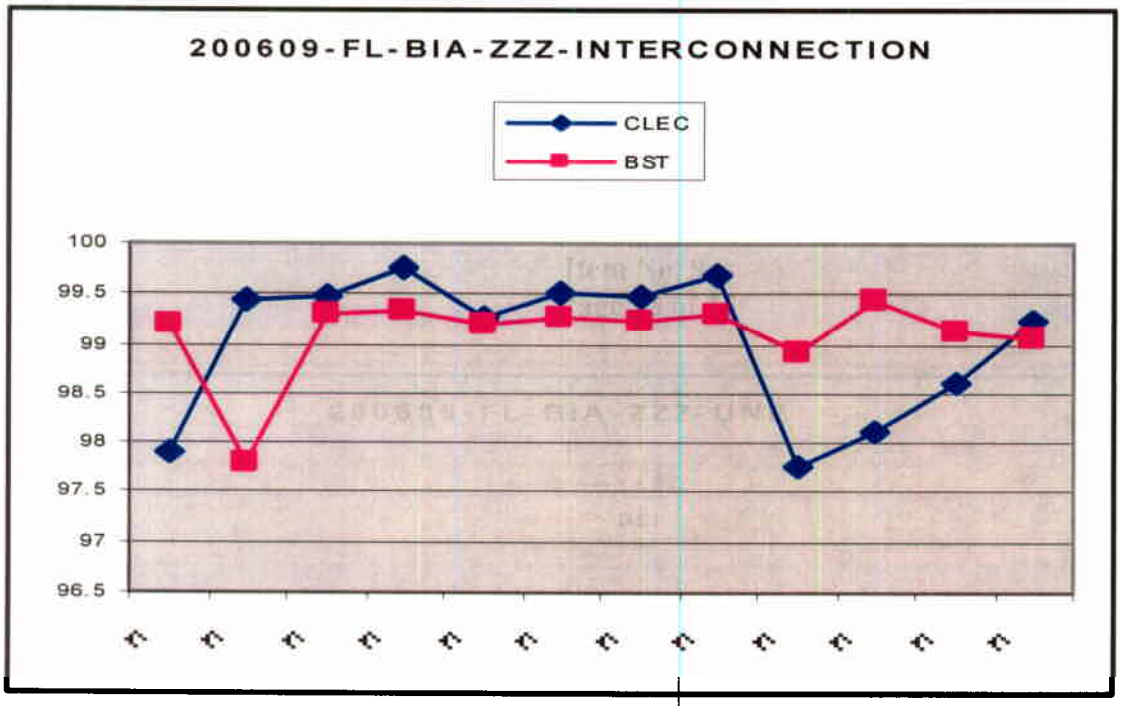


Chart 9.9



REQUEST: Determine what issues about the SEEM plan's statistical tests, in relation to its appropriateness in assessing remedies in Force Majeure events, BellSouth and the CLECs can agree on and what issues have disagreement.

RESPONSE: BellSouth has provided below the areas of agreement and disagreement between BellSouth and the CLECs, with respect to the impact of force majeure events on the operation the SEEM plan.

Agreement:

1. The parties agree that the 2 sample statistical test used in SEEM attempts to separate assignable cause variations from random process variability in the populations by using the difference between the samples.
2. The parties agree that in a Force Majeure event the normal random variation in a process probably increases.
3. During a force majeure event the truncated z-score process difference variation will very likely be larger than the truncated z-score process difference variation under normal operating conditions.
4. The parties agree that, outside of Force Majeure, there are events that occasionally occur which falsely indicate a systemic event and BellSouth will be assessed remedies (Type I error). Furthermore, there are events that occasionally occur which falsely indicate random variation (Type II error). BellSouth will not be assessed remedies. The BCV methodology in SEEM is constructed to equate the probabilities of these two classes of errors.
5. The parties agree that when the statistical test in the SEEM plan indicates failure under normal operating conditions, that the plan will automatically assign remedies as if the assignable variation is an indication of a systemic problem in the process. Furthermore, the parties agree that when the statistical test in the SEEM plan indicates anything other than failure under normal operating conditions, that the test will automatically assign no remedies as if the assignable variation is an indication of random variation in the process.
6. The statistical test used in SEEM assumes that there is no difference between wholesale and retail performance distribution parameters (null hypothesis) and tests this assumption based on collected data. The statistical test is designed to declare failure only if the difference between wholesale and retail performance distribution parameters is significant, as defined by a measure of materiality which is based on business judgment (e.g., delta) (alternative hypothesis).

Disagreement (BellSouth):

1. **That factors in a Force Majeure event can affect BellSouth and CLEC customers differently.**

   Under normal operating conditions BellSouth is in control of the process and, as a result, the underlying distributions of the process can be compared to see whether discrimination exists.

   Force Majeure removes that control and as a result the comparison of the underlying distributions through the truncated z statistical test is no longer a valid indicator of whether discrimination exists.

   If two boats are in the same water at the same time then as the tide rises and falls the two boats should still ride comfortably and comparably calm. However, if a storm comes and the waves become excessive, a larger boat is not going to experience as much turbulence as a smaller speed boat. The same factor can affect two different entities in very different ways and it is not the fault of either boat owner. BellSouth can typically control its process (the water) under normal operating conditions but under Force Majeure events (the stormy waves) BellSouth has no control over how the outside influence will affect its processes.

   In this workshop, Mr. Varner has detailed several instances that will cause harm to either a CLEC and/or BellSouth during a Force Majeure event without BellSouth being able to control the event or the outcome.

   Recall that the truncated z test statistic is based on a modified z score, which uses BellSouth's variability to estimate the variability of the differences in BellSouth and CLEC process measures (mean, proportion, rate). As in the boat example above, due to size of company, business plans, how the storm hit, emergency response issues, etc., BellSouth's variability may or may not be indicative of the CLEC variability. BellSouth is not willing to make that generalization.

2. **The fluctuating random variabilities in the process will appear (and most likely are) systemic due to the Force Majeure event and not due to a process problem attributable to BellSouth.**

   BellSouth agrees with the often stated point that if the variability remained random and simply increased in magnitude that this will actually be accounted for in the truncated z statistical test. Since the statistical test estimates the standard deviation of the process with sample data from the process, any increase in variance in the data

will be reflected with an increased estimate of the process's standard deviation. BellSouth tested this by running production data for the mean measure MAD through PARIS with 10 times the normal process standard deviation. That's the same data with each value multiplied by a factor of 10. Not surprisingly, the results were identical with the exception of a few tests where the permutation calculation came out with slightly different results. This shows that any consistent increase in variability in the data will be reflected in the standard deviation calculations used for SEEM.

However, this is not the situation that occurs in a Force Majeure event. In that case, the increases in variability are not constant over time. In normal operating circumstances, any change in variation over time is considered to be part of the typical BellSouth process. However, variation changes in the process due to Force Majeure events are beyond BellSouth control. The null test hypothesis (found in D.2.5 of SEEM plan) has its basis in the assumption that the variances of BellSouth and the CLECs are identical for the entire time period, $\sigma_{1j}^2 = \sigma_{2j}^2$. Force Majeure will cause this assumption to be false in many cases, as Mr. Varner has alluded to in the workshop.

The testing assumption is that the process does not change over time, especially within a month which is the "snapshot" of data used for the SEEM test. That is, the process means for BellSouth and the CLECs, as well as the variances for BellSouth and the CLECs, are constant for the entire month. If these assumptions are not true in normal operating conditions then both parties have agreed (by adoption of the SEEM plan) that BellSouth will pay remedies as if they had complete control of the process. However, in Force Majeure events, BellSouth knowingly is not in control of its processes and depends heavily on outside parties and events to schedule and perform work activities.

Obviously, within a month containing a Force Majeure event, the process variation will change from before the event to after the event. This was Agreement 2. Chart 1b below gives an example of how this would look for data from a typical process while Chart 1a shows expected variation in a typical process month.

Chart 1a – Process under normal conditions

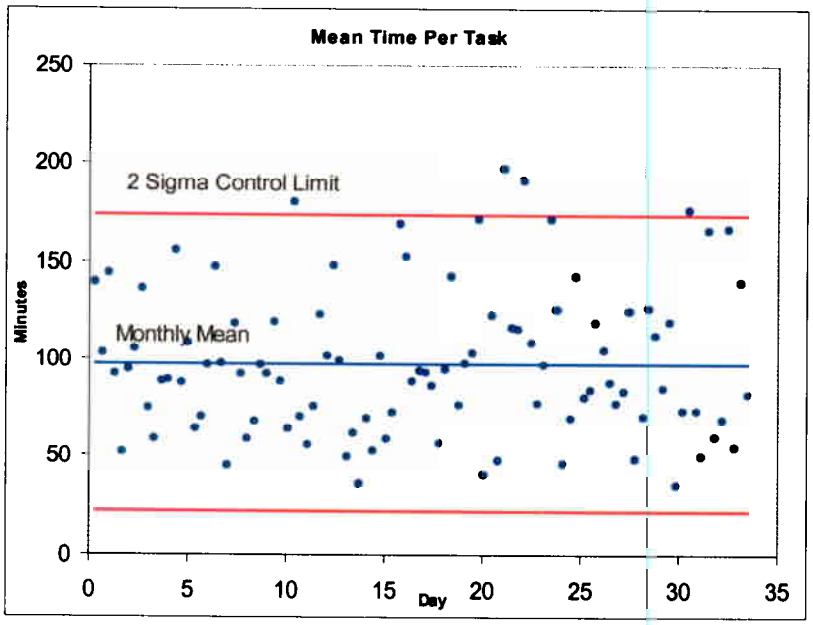
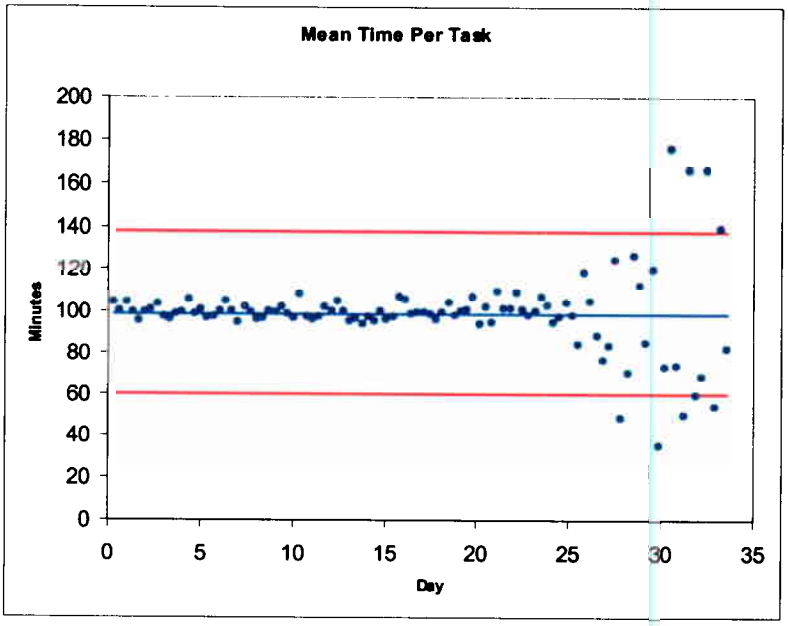


Chart 1b – Chart with an increase in variance due to Force Majeure event

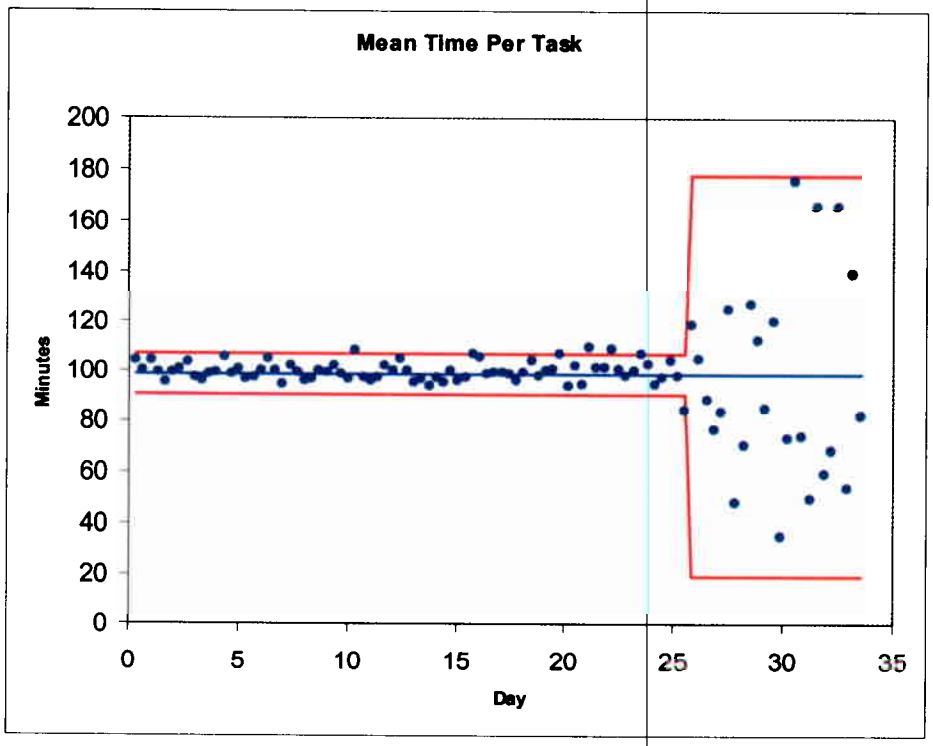


The point of this chart is to show the influence of unstable variability shifts, which indicates how a statistical test, such as the truncated z test, will potentially misjudge the data. Notice that none of the initial 25 days of data will even come close to being

out-of-control because the process variation has increased in the last few days of the time period.

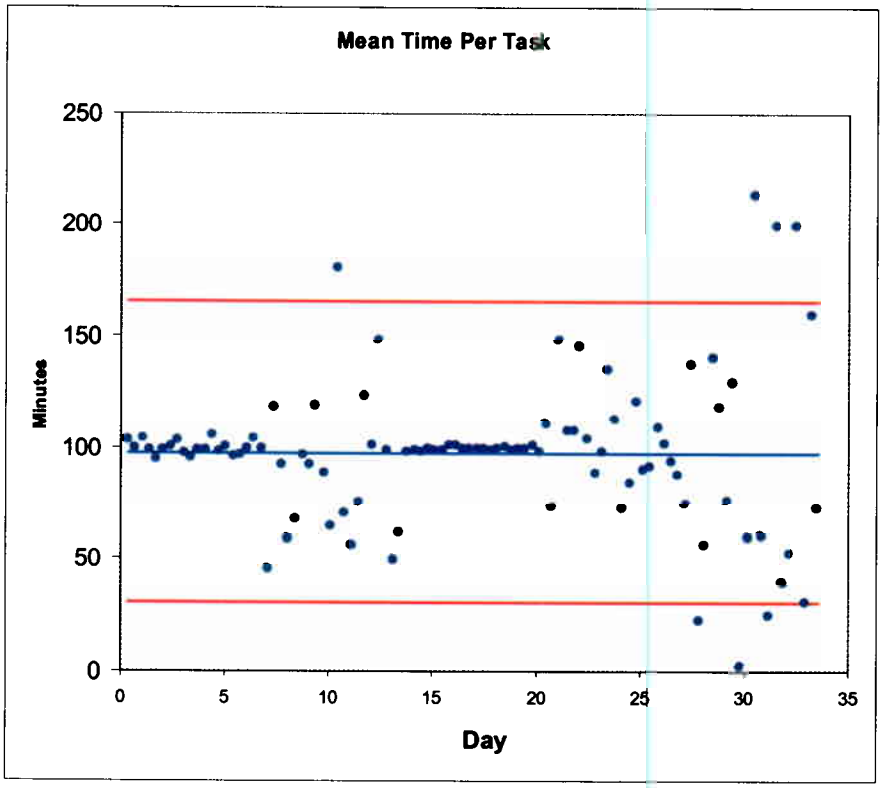
Also, notice that several of the last data points are determined to be out-of-control when compared to the tighter control limits that the earlier month's data impose. What should actually happen here is that each time period should be analyzed separately as in Chart 1c.

Chart 1c



If there was just one variation change in the entire process then the test might be able to account for this problem in the Force Majeure data. However, there is not just one variation shift in Force Majeure events. As daily activities are directed by emergency procedures the variances in the processes will continue to fluctuate over time and across cells (wire centers, etc.). Accounting for this variability difference is impossible to accomplish. In fact, the overall process could look like Chart 1d or worse in a Force Majeure event.

Chart 1d



Small volumes make it very likely that these variation fluctuations will cause major problems with the truncated z statistical test's ability to properly determine if discrimination is occurring.

Another concern of BellSouth is that an increase in variability may not be consistent across a "wire center, time of month, dispatched residential, new orders" (SEEM plan section C.1.1 Like-to-Like Comparisons). Several areas within a wire center will potentially be affected differently by the same event. Some could cause an increase in a performance measure while others could decrease a performance measure. One day all of BellSouth's technicians could be focused on one area and perform many tasks in an unusually short length of time. The next day, due to emergency restoration procedures, the technicians may be asked to scatter across many locations and the length of time per task could greatly increase. This is just one example of the many that BellSouth sees during restoration efforts.

BellSouth is also concerned that performance among the cells might be compromised due to a Force Majeure event. While the truncated z test attempts to standardize all of the cell level data so that they can be combined into the overall truncated z test

statistic, during a Force Majeure event, different cells will have much greater variabilities than other cells. That will make their truncated z scores have greater variability than other z scores.

Some wire centers will be giving up personnel to travel to affected areas. This will introduce a new variability into these areas. As some wire centers work back into normal operations their scores will stabilize back to a solid variation while other cells will still be unduly influenced by the extra variabilities in the process.

Volumes will also fluctuate dramatically across cells, within cells, over time, and among CLECs. This alone would likely create an unstable statistical testing environment.

A major problem is that we do not have any idea how the Force Majeure event is affecting the underlying process variances across the aforementioned factors (over time, across wire centers, throughout the state, etc.)

BellSouth wanted to test a particular event to see how PARIS would handle an increase in variability that was intentionally introduced into the process. To accomplish this task BellSouth used August data, since it was readily available, for the measure MAD in Florida. The scenario used here, which is clearly reasonable to expect during a Force Majeure event, is one where there is a lot more volume and where some of the tasks would still be completed as they would during normal operations but where others would have an increase in variability. To design the simulation we took the typical month's data and added onto that data the exact same data multiplied by 10. The simulation is consistent with the scenario design in that the data reflects that much activity is performed the same as it would under normal operating conditions, but other activities result in data that have a much increased variance. Note that only the true, actual data and a multiple of the true, actual data were used in the simulation. No new random data was generated. The bottom line results are provided in Attachment 1. Notice there is little rhyme or reason as to which submeasures fail and how much is to be paid out. Also, note that BellSouth did not make the variance fluctuate over time, which is very like to occur during a Force Majeure event. These added variability changes would have provided an even bigger difference in normal operating results and results seen under Force Majeure conditions.

The cell z-scores, the skewness factor, the mean and variance of the hypotheses, and the roll-up of truncated z-scores are all affected by the increase in variability.

Recall what happened last year when BellSouth calculated what remedies would have been, had SEEM been enforced during Force Majeure. Penalties went up and down. In the few cases where the cause of the penalty was ascertained, the cause had nothing to do with discrimination. It all points to the fact that the SEEM plan is not dependable during a Force Majeure event.

The authors of the plan obviously agreed that the SEEM plan was not an appropriate mechanism to use during Force Majeure or they would not have put the provision in the plan. There is not enough evidence provided to prove that the plan has suddenly become an acceptable tool to evaluate and compare performances during a Force Majeure event. In fact reasonable analysis confirms that the Force Majeure exemption for SEEM payments should continue and there has been no evidence that BellSouth has improperly applied this exemption in the past.

(MAD FLORIDA 200608) PROD REMEDIES COMPARED TO DS REMEDIES WITH DURATIONS * 10

COMMON COLUMNS SHARED BY DS AND PROD						DECISION SUPPORT VALUES							PRODUCTION VALUES						
SUBM_CD	CMPNY_ID	SUBM_KEY	TIER	ST_CD	YR_MTH	CLEC_TRN_CNT	TAV_1	TAV_2	STATUS	REMEDY_AMT	FAIL_MTH	RU_KEY	REK	CLEC_TRN_CNT	TAV_1	TAV_2	STATUS	REMEDY_AMT	FAIL_MTH	RU_KEY	REK
MAD-LSPLT	51237	26741	1	FL	200608	15	3	1	PROPOSED	1401.67	3	422966	6046	15	3	1	TRANSMIT	1401.67	3	374033	457
MAD-POTS	46253	26742	1	FL	200608	88	1	8	PROPOSED	166.67	1	422962	6046	88	1	7	TRANSMIT	153.33	1	373904	457
MAD-POTS	47289	26742	1	FL	200608	7	1	0	PROPOSED	60	1	422970	6046								
MAD-POTS	50417	26742	1	FL	200608	8	1	1	PROPOSED	73.33	1	422973	6046	8	1	1	WAITING	73.33	1	374415	457
MAD-POTS	51233	26742	1	FL	200608	57	5	7	PROPOSED	393.33	1	422964	6046	57	5	8	TRANSMIT	406.67	1	373957	457
MAD-POTS	51399	26742	1	FL	200608	14	2	0	PROPOSED	120	1	422960	6046	14	2	0	TRANSMIT	120	1	373762	457
MAD-POTS	52425	26742	1	FL	200608	13	5	1	PROPOSED	313.33	1	422961	6046								
MAD-POTS	53629	26742	1	FL	200608	10	1	0	PROPOSED	60	1	422968	6046	10	1	0	TRANSMIT	60	1	374147	457
MAD-POTS	57001	26742	1	FL	200608	7	1	0	PROPOSED	60	1	422969	6046								
MAD-POTS	57631	26742	1	FL	200608	12	2	1	PROPOSED	133.33	1	422963	6046	12	2	1	HELDAUTH	133.33	1	373934	457
MAD-ULPD	47311	26744	1	FL	200608	11	1	1	PROPOSED	210.83	1	422971	6046	11	1	1	TRANSMIT	210.83	1	374323	457
MAD-ULPN	46407	26745	1	FL	200608	28	3	2	PROPOSED	594.17	1	422965	6046	28	3	2	TRANSMIT	594.17	1	373981	457
MAD-ULPN	57701	26745	1	FL	200608	14	2	1	PROPOSED	383.33	1	422972	6046	14	1	2	WAITING	249.17	1	374332	457
MAD-UXDSL	51237	26747	1	FL	200608	42	3	3	PROPOSED	632.5	1	422967	6046	42	3	3	TRANSMIT	632.5	1	374035	457
MAD-LSPLT	-1	26749	2	FL	200608	16	4	1	PROPOSED	1601	3	422974	6046	16	4	1	TRANSMIT	1601	3	374475	457

(MAD FLORIDA 200608) PROD REMEDIES COMPARED TO DS REMEDIES WITH DUPLICATE TRANSACTIONS (DOUBLE VOLUME)

COMMON COLUMNS SHARED BY DS AND PROD						DECISION SUPPORT VALUES							PRODUCTION VALUES						
SUBM_CD	CMPNY_ID	SUBM_KEY	TIER	ST_CD	YR_MTH	CLEC_TRN_CNT	TAV_1	TAV_2	STATUS	REMEDY_AMT	FAIL_MTH	RU_KEY	REK	CLEC_TRN_CNT	TAV_1	TAV_2	STATUS	REMEDY_AMT	FAIL_MTH	RU_KEY	REK
MAD-LSPLT	51237	26741	1	FL	200608	30	5	3	PROPOSED	2465	3	422986	6047	15	3	1	TRANSMIT	1401.67	3	374033	457
MAD-POTS	46253	26742	1	FL	200608	176	7	21	PROPOSED	700	1	422980	6047	88	1	7	TRANSMIT	153.33	1	373904	457
MAD-POTS	46507	26742	1	FL	200608	14	1	1	PROPOSED	73.33	1	422988	6047								
MAD-POTS	46513	26742	1	FL	200608	8	1	1	PROPOSED	73.33	1	422990	6047								
MAD-POTS	47209	26742	1	FL	200608	8	5	2	PROPOSED	326.67	1	422994	6047								
MAD-POTS	47289	26742	1	FL	200608	14	2	0	PROPOSED	120	1	422995	6047								
MAD-POTS	50417	26742	1	FL	200608	16	2	2	PROPOSED	146.67	1	422998	6047	8	1	1	WAITING	73.33	1	374415	457
MAD-POTS	51215	26742	1	FL	200608	6	1	1	PROPOSED	73.33	1	422975	6047								
MAD-POTS	51233	26742	1	FL	200608	114	14	18	PROPOSED	1080	1	422982	6047	57	5	8	TRANSMIT	406.67	1	373957	457
MAD-POTS	51399	26742	1	FL	200608	28	2	3	PROPOSED	160	1	422976	6047	14	2	0	TRANSMIT	120	1	373762	457
MAD-POTS	52425	26742	1	FL	200608	26	10	2	PROPOSED	626.67	1	422977	6047								
MAD-POTS	53581	26742	1	FL	200608	6	2	1	PROPOSED	133.33	1	422978	6047								
MAD-POTS	53629	26742	1	FL	200608	20	1	2	PROPOSED	86.67	1	422991	6047	10	1	0	TRANSMIT	60	1	374147	457
MAD-POTS	53685	26742	1	FL	200608	10	1	0	PROPOSED	60	1	422979	6047								
MAD-POTS	57001	26742	1	FL	200608	14	1	1	PROPOSED	73.33	1	422993	6047								
MAD-POTS	57327	26742	1	FL	200608	6	2	0	PROPOSED	120	1	422992	6047								
MAD-POTS	57631	26742	1	FL	200608	24	4	2	PROPOSED	266.67	1	422981	6047	12	2	1	HELDAUTH	133.33	1	373934	457
MAD-ULPD	46407	26744	1	FL	200608	52	1	4	PROPOSED	325.83	1	422983	6047								
MAD-ULPD	46507	26744	1	FL	200608	8	3	1	PROPOSED	555.83	1	422989	6047								
MAD-ULPD	47311	26744	1	FL	200608	22	5	2	PROPOSED	939.17	1	422996	6047	11	1	1	TRANSMIT	210.83	1	374323	457