

## Eric Fryson

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**From:** Maro, Corrine <CMaro@gunster.com>  
**Sent:** Tuesday, April 30, 2013 3:08 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'soniadaniels@att.com'; 'greg.follensbee@att.com'; 'susan.masterton@centurylink.com'; 'gdiamond@covad.com'; Kelley Corbari; 'dkonuch@fcta.com'; 'carolyn.ridley@twtelecom.com'  
**Subject:** Docket No. 000121B-TL  
**Attachments:** CompSouth Letter 4 30 13.pdf

Attached for electronic filing, please find today's correspondence in the above-referenced docket.

a. Person responsible for this electronic filing:

Kellie Scott  
Gunster, Yoakley & Stewart, P.A.  
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Tallahassee, FL 32301  
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b. Docket No. 000121B-TL - **Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (CENTURYLINK FLORIDA TRACK)**

c. On behalf of: Competitive Carriers of the South, Inc. ("CompSouth")

d. There are a total of pages: 1

e. Description: 4.30.13 Letter

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April 30, 2013

**ELECTRONIC FILING**

Ms. Ann Cole, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: Docket No. 000121B-TL – **Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (CENTURYLINK FLORIDA TRACK)**

Dear Ms. Cole:

Consistent with our discussions on the April 24, 2013, conference call between Public Service Commission (“PSC”) staff, Competitive Carriers of the South, Inc. (“CompSouth”), and CenturyLink, the parties have continued further exchange of information in an attempt to reach agreement on outstanding issues relating to CenturyLink’s proposed changes to its Performance Measures Plan (“PMP”). While CompSouth appreciates the chance to have this dialogue and believes the opportunity has allowed the parties to better understand each other’s positions, CompSouth now believes that the parties have reached an impasse such that further discussion would not be productive.

In light of the comments filed in this regard, as well as the discussion on the April 24<sup>th</sup> call, CompSouth believes that PSC staff has a firm grasp of the parties’ positions with regard to the proposed changes. Thus, CompSouth simply reiterates here that greater consistency with the AT&T PMP plan would provide a more balanced, competitive platform in Florida. Additionally, CompSouth would like to suggest that a staff management audit or other third party audit of CenturyLink’s performance measures, as originally contemplated by Orders Nos. PSC-03-0067-PAA-TP and PSC-03-1438-PAA-TP, may be warranted.

Thank you for your assistance with this filing.

Sincerely,

*s/ Kellie Scott*

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