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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory)	Docket No. 981834-TP
In Re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996)	Docket No. 960786-TL
	Filed: 12/22/99

AT&T's Second Comments Concerning
Interim Performance Measures for Third Party Test

AT&T Communications of the Southern States, Inc. ("AT&T"), hereby files its second comments concerning the interim performance measures for the Third Party Test to be conducted by the Florida Public Service Commission ("Commission").

AT&T commends Staff and KPMG for the work both have done to generate the proposed Interim Metrics for the Florida Third-Party Test. AT&T has reviewed the proposed interim metrics and participated in the two workshops held on December 1 and 17, 1999 to discuss metrics and the statistical methodology. AT&T offers these additional comments concerning the proposed interim metrics and the statistical methodology:

I. The Proposed Interim Metrics

The proposed Interim Metrics incorporated some of the changes to BellSouth Telecommunications, Inc.'s ("BellSouth's") existing business rules (disaggregation, analogs and benchmarks, definitions, calculations) that were requested by AT&T and other CLECs, but none of the proposed new measures.[1] Staff and KPMG explained in the cover letter accompanying the proposed Interim Metrics that many of the CLECs' recommended additions and changes were not incorporated for the test in order to avoid delaying the start of the third party test.

[1] Although the KPMG's cover letter did indicate that CLEC proposed metrics would be used as diagnostics tools in the test, this limited approach does not allow for comparison of the results of the pseudo-CLEC to actual CLEC results. Additionally, it is unclear what relative importance these diagnostic results will be given should they provide differing indicators of performance from measures from BellSouth's SQM.

The decision to accept BellSouth's Service Quality Measurements ("SQM") document for the test with virtually no changes or additions means that Staff and KPMG have erred on the side of a quick start versus a meaningful review of BellSouth's actual performance in the marketplace. Rhythms Links Inc. ("Rhythms") argued convincingly for why its proposed "loop make-up information" measure should be added and for why the SQM's business rules for collocation and some of the SQM's disaggregation specifications should be changed. The proposed Interim Metrics report added xDSL loop qualification but it is unclear whether the third party test will measure BellSouth's compliance with the FCC's UNE Remand Order for the level of detail needed by CLECs.[2] Similarly, MGC requested two additional measures beyond those in BellSouth's current SQM.[3] MCI WorldCom Inc. and ITC^DeltaCom Communications, Inc. also recommended nine additional measures and other changes to the disaggregation and analogs and benchmarks from those reflected in BellSouth's SQM.[4] AT&T recommended seven (7) additional measurements, none of which were included as a part of the list of interim measures for the third party test.

The CLECs recommended additional measures and changes to business rules (disaggregation, analogs and benchmarks, definitions, and calculations) because experience in the marketplace has revealed that what BellSouth measures through its SQM is glaringly deficient in capturing some very real problems that customers experience as a result of BellSouth's performance. Indeed, Rhythms' concerns about BellSouth's performance in providing xDSL-capable loops is consistent with customer-affecting concerns the DOJ has expressed and is demanding be addressed by Bell Atlantic-New York in its recent 271 relief application.[5] MCI WorldCom's and ITC^DeltaCom's recommendation for a measure to capture BellSouth's change management procedures also has been emphasized by the DOJ in its comments recently filed in the Bell Atlantic-New York 271 application.[6]

The third party test will provide a truer picture of BellSouth's actual performance and how it affects customers if the recommended measures and other changes are added to the Master Test Plan. AT&T is encouraged, however, by Staff's and KPMG's indications in the cover letter and during the workshops that the Phase II Test Manager is

[2] In the matter of Implementation of Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Released November 5, 1999.
[3] Comments of MGC Communications, Inc. Regarding Proposed OSS Testing Metrics, Florida Public Service Commission, Docket Nos. 981834-TP and 960786-TL, pp. 2-3, November 19, 1999.
[4] Comments of MCI WorldCom and ITC^DeltaCom on Interim Performance Metrics, Florida Public Service Commission, Docket Nos. 981834-TP and 960786-TL, pp. 3-10, November 19, 1999.
[5] In the Matter of Application by New York Telephone Company (d/b/a Bell Atlantic-New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc., for Authorization to Provide In-Region, InterLATA Services in New York, CC Docket No. 99-295, Evaluation of the United States Department of Justice, pp. 37-47, November 1, 1999.
[6] Id.at pp. 57-59.

aware of the CLECs' concerns about the measures, disaggregation, analogs, benchmarks, and other business rules and will comment upon the need for changes and enhancements to those items in the third party test results.

See Attachment A for additional AT&T concerns with KPMG's recommended changes to BellSouth's SQM.

II. Statistical Methodology

Dr. Colin Mallows, AT&T Labs and Ed Mulrow of Ernst & Young for BellSouth participated in the workshop on December 17, 1999. Dr. Mallows and statisticians with Ernst & Young working on behalf of BellSouth have worked for many months to resolve issues related to the statistical methodology.[7] They reported during the December 17, 1999 workshop that they have agreement on all of the statistical methodology issues. The truncated z statistic, recommended by Dr. Mallows, will be used to aggregate within each subcategories of each measure.

There are two remaining questions related to the statistical methodology which are "business" decisions rather than analysis for the statisticians. The questions are as follows:

a. Are the CLECs in agreement with using the "deterministic" model for the benchmarks?

and

b. How much random variation is acceptable for each measure?

The first question addresses the issue of whether a statistical methodology will be applied to those measures for which there is a benchmark rather than an analog. AT&T's position is that a benchmark is either met or missed. Any tolerance for variation in performance must be built into the benchmark when it is set. There will be no random variation calculation with respect to measures with benchmarks.

Concerning how to determine a tolerable level of random variation for each measure, AT&T will review the results derived from BellSouth's proposed values that BellSouth says will be available in January, 2000.[8] AT&T's preliminary thoughts

[7] This work has taken place in the context of the Louisiana performance measures proceeding, Docket No. U-22252-C. Workshops started in the Louisiana proceeding in July of 1998 and have continued throughout 1999. The next workshop in the Louisiana proceeding is scheduled for February 7-11, 2000.

[8] BellSouth has proposed setting the delta values at 1 for individual measures and .5 for the aggregate. BellSouth stated that it will make the results of these calculations available in January, 2000 at which time AT&T (and Staff, KPMG, and other CLECs) can review the results and determine if the deviations reflected at these values are tolerable for each measure.

concerning the delta and lambda values, however, is that reasonable results are more likely to be achieved with delta values very near zero and lambda values closer to 0.1.

Conclusion

AT&T would have preferred full implementation of the CLEC recommendations for additions and changes to the interim metrics, disaggregation, analogs and benchmarks, and other business rules. AT&T remains concerned that because the third party test will rely almost exclusively on BellSouth's measures and business rules as reflected in its SQM, the results will not be as true and meaningful as they otherwise could have been.

RESPECTFULLY SUBMITTED this 22nd day of December, 1999.

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AT&T's Additional Comments regarding the Interim Measures[1]

Pre-Ordering - OSS	1. Average OSS Response Time and Response Interval AT&T Comments: BellSouth should be required to implement prior to the start of the test the business rule and calculation revisions recommended by KPMG. Recording of the data by KPMG alone, as was suggested in the December 17, 1999 workshop, does not allow for comparison to retail or CLEC aggregate. AT&T does not agree that additional time should be added to the CLEC transaction for this measure as recommended by KPMG. The transaction time should instead be compared to the retail transaction, including the time required to return the query to BellSouth interfaces such as RNS. 2. OSS Interface Availability AT&T Comments: BellSouth should be required to publish the schedule of availability for its own OSS. The availability for all OSS interfaces used for BellSouth and CLECs should be included and reported.
Ordering	1. Percent Flow-through Service Requests (Summary) AT&T Comments: AT&T supports KPMG's benchmark of 98% flow-through until BellSouth provides comparative retail data. AT&T understands that this benchmark is only being applied to Local Service Requests (LSRs) designated by BellSouth as flow-through, but that KPMG recommends a separate analysis of CLEC LSRS that flow –through compared to BellSouth orders that flow-through. 2. Percent Flow-through Service Requests (Detail) 3. Flow-through Error Analysis 4. Percent Rejected Service Requests AT&T Comments: AT&T does not object to the review of this measure as diagnostic for purposes of the interim measures based on its understanding that the analysis will be conducted on the data collected and recommendations for improvement will be made by the tester. AT&T requests that this analysis be conducted on CLEC market data, as well as test data. 5. Reject Interval AT&T Comments: BellSouth should be required to implement the business rule and calculation revisions recommended by KPMG prior to the start of the test. Recording of the data by KPMG

[1] See Attachment B of AT&T's Comments filed on November 19, 1999 in this docket.

	alone, as was suggested in the December 17, 1999 workshop, does not allow for comparison to the CLEC aggregate. AT&T does not agree with the benchmarks recommended by KPMG, and requests that the Commission adopt the benchmarks adopted by the Texas or California Commissions. If BellSouth provides an acceptable retail analog for its own rejection performance, that could be used instead of the benchmark California: Fully mechanized with 20 minutes, partially mechanized within 5 hours, and non-mechanized within 10 hours. Texas: 97% of electronic within 1 hour, 97% of manual in 5 hours. 6. Firm Order Confirmation Timeliness AT&T Comments: BellSouth should be required to implement the business rule and calculation revisions recommended by KPMG prior to the start of the test. Recording of the data by KPMG alone as was suggested in the December 17, 1999 workshop does not allow for comparison to CLEC aggregate. AT&T does not agree with the benchmarks recommended by KPMG, and requests that the Commission adopt the benchmarks adopted by the Texas or California Commissions. If BellSouth provides an acceptable retail analog for its own FOC performance, that could be used instead of the benchmark. California: Fully mechanized with 20 minutes, partially mechanized with 5 hours, and non-mechanized within 12 hours. Texas: Electronic--simple 95% within 5 hours/complex 1-200 lines 94% within 24 hours, complex 200+ 94% within 48 hours, UNE 1-49; 95% within 5 hours, 50+ 94% within 48 hours. Manual— simple 95% within 24 hours/complex 1-200 lines 94% within 24 hours, complex 200+ 94% within 48 hours, UNE 1-49; 95% within 24 hours, 50+ 94% within 48 hours. 7. Speed of Answer in Ordering Center AT&T Comments: AT&T does not agree with KPMG's recommendation of parity with retail aggregate as the CLEC mix and residential and business accounts likely will be different than the BellSouth mix, and instead recommends the LCUG benchmark of 95% within 20 seconds, and 100% within 30 seconds, or the California benchmark of 15 seconds.
Provisioning	1. Mean Held Order Interval & Distribution Intervals AT&T Comments: AT&T does not agree with KPMG's proposed benchmark as it believes allows BellSouth excessive time to hold orders. AT&T recommends that the Commission adopt the retail analogs from California or Texas and require parity, or alternatively adopt the LCUG benchmark of less than 0.1% of orders held for more than 15 calendar days and no orders held for more than 90 calendar days.

	2. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices AT&T Comments: AT&T supports KPMG's recommendation that no more than 5% of CLECs' orders received be put in jeopardy by BellSouth, but disagrees with KPMG's proposal for the jeopardy interval. AT&T recommends that the Commission adopt the retail analogs from California or Texas and require parity, or alternatively adopt the LCUG benchmark that 97% of its LSRS receive more than 48 hours notice. (BellSouth's current reported performance greatly exceeds the performance level required by this benchmark). BellSouth also should be required to provide jeopardy notices for manual orders. 3. Percent Missed Installation Appointments AT&T Comments: AT&T disagrees with KPMG's recommendation of the use of the intervals unilaterally established by BellSouth in its Interval Guide. AT&T recommends that the Commission adopt the retail analogs from California or Texas and require parity, or alternatively adopt the LCUG benchmark of 98% of appointments be met by BellSouth. AT&T further recommends that the Commission require BellSouth to modify its definition to include the time as well as the date of the appointment. 4. Average Completion Interval Order Completion Interval Distribution AT&T Comments: AT&T disagrees with KPMG's recommendation of the use of the intervals unilaterally established by BellSouth in its Interval Guide. AT&T recommends that the Commission adopt the retail analogs from California and require parity or the benchmarks from Texas. (See attachment C of AT&T's November 19, 1999 comments filed in this docket.) AT&T also strongly disagrees with KPMG's recommendation that products with negotiated intervals should be excluded. First, BellSouth also has negotiated intervals for its end-users that should mitigate concerns about parity in this measure. Second, other jurisdictions, such as Texas and California, have not included this exclusion which could mask RBOC discrimination. Third, BellSouth's use of negotiated intervals is much more extensive than other RBOCs. For example, BellSouth requires negotiation on 16 or more resold lines, and 15 or more loops, while Texas and California performance plans indicate no such requirements. (It also is noteworthy that BellSouth did not ask for this exclusion.) AT&T also requests that KPMG expand the definition of this measure to require that it include the end-to-end time--from the time that a valid order is submitted to BellSouth to the completion date and time, as is recommended by KPMG for other timeliness measures, such as firm order confirmation and reject intervals. Additionally, BellSouth should be required to implement this revision prior to the start of the test. Recording of the data by KPMG alone, as was suggested in the December 17, 1999 workshop for the firm order confirmation and rejections measures, does not allow for comparison to BellSouth retail or the CLEC aggregate.

	5. Average Completion Notice Interval AT&T Comments: AT&T does not understand and does not agree with KPMG's recommendation that the benchmark for this measure is 95% on time based on BellSouth's unilaterally developed and Interval Guide. AT&T also strongly disagrees with KPMG's recommendation that products with negotiated intervals should be excluded for the reasons cited in the measure above. Further, AT&T does not understand why negotiated product intervals should be excluded from this measure, even if adopted for Order Completion Interval. Notably, BellSouth has not requested this exclusion. AT&T recommends that the Commission adopt the retail analogs from California or Texas and require parity, or alternatively adopt the LCUG benchmark that 97% of notices be sent to the CLEC within 30 minutes. California's requirement of 20 minutes for electronic orders and 24 hours for other orders is worthy of consideration as is the Texas requirement for 97% of mechanized provided in one hour. BellSouth also should be required to provide completion notices for manual orders. AT&T requests that KPMG expand the definition of this measure to require that it include the end-to-end time from beginning of the transaction to provision of the notice to the CLEC, as is recommended by KPMG for other timeliness measures such as firm order confirmation and reject intervals. Additionally, BellSouth should be required to implement this revision prior to the start of the test. Recording of the data by KPMG alone, as was suggested in the December 17, 1999 workshop for the firm order confirmation and rejections measures, does not allow for comparison to BellSouth retail or CLEC aggregate. 6. Coordinated Customer Conversions AT&T Comments: AT&T does not understand and does not agree with KPMG's recommendation that the benchmark for this measure is 95% on time based on BellSouth's unilaterally developed and Interval Guide. AT&T also strongly disagrees with KPMG's recommendation that products with negotiated intervals should be excluded for the reasons cited in the measure above. Further, AT&T does not understand why negotiated product intervals should be excluded from this measure, even if adopted for Order Completion Interval. Notably, BellSouth has not requested this exclusion. AT&T recommends that the Commission adopt the LCUG benchmark that 98% of conversions be completed within 5 minutes and 100% within 15 minutes. (Texas and California do not have a comparable measure.) 7. Percent Provisioning Troubles w/i 30 days AT&T Comments: AT&T supports KPMG's recommendation for this measure, assuming that KPMG is recommending that no more than 1.5% of UNE lines have troubles within 30 days of provisioning.

	8. Total Service Order Cycle Time AT&T Comments: AT&T does not understand KPMG's recommendation for this measure. The recommended 5 days is not consistent with the Interval Guide for UNEs. KPMG utilized BST's Interval Guide for its recommendations as to other measures. AT&T also disagrees that this measure should be applicable only to mechanized orders. AT&T recommends that the Commission adopt the retail analogs for services and benchmarks for firm order confirmations from California or Texas and use the appropriate combinations to evaluate BellSouth's performance. If BellSouth provides an acceptable retail analog for its own FOC performance, that could be used instead of the benchmark.
Maintenance & Repair	AT&T Comments: AT&T supports the analogs recommended by KPMG for M&R measures 1-5. 1. Missed Repair Appointments 2. Customer Trouble Report Rate 3. Maintenance Average Duration AT&T Comments: AT&T requests that KPMG expand the definition of this measure to require that it include the end-to-end time, starting with when the trouble ticket is received and ending when the CLEC is notified of trouble resolution, as is recommended by KPMG for other timeliness measures, such as firm order confirmation and reject intervals. Additionally, BellSouth should be required to implement this revision prior to the start of the test. Recording of the data by KPMG alone, as was suggested in the December 17, 1999 workshop for the firm order confirmation and rejections measures, does not allow for comparison to BellSouth retail or the CLEC aggregate. 4. Percent Repeat Troubles w/i 30 days) 5. Out of Service > 24 Hours 6. OSS Interface Availability AT&T Comments: KPMG's recommendation cannot be applied to this measure. AT&T accepts BellSouth's recommendation of the ECTA benchmark for the test. BellSouth should be required to publish the schedule of availability for its own OSS. The availability for all OSS interfaces used for BellSouth and CLECs should be included and reported. 7. OSS Response Interval and Percentages KPMG's recommendation cannot be applied to this measure. BellSouth should be required to provided an average interval and more user friendly data in terms that directly compare performance for the CLECs and BellSouth and descriptions of OSS functionality. For ECTA, BellSouth should provide information for the following query types:

	Creation or logging of a maintenance request: Obtain status Obtain test results Cancel request Rejected or failed queries Clearance notification Closure notification 8. Average Answer Time - Repair Centers AT&T Comments: KPMG's recommendation cannot be applied to this measure. AT&T recommends the LCUG benchmark of 95% within 20 seconds, and 100% within 30 seconds, or the California benchmark of 20 seconds.
Billing	1. Invoice Accuracy AT&T Comments: AT&T believes that this measure will result in an inadequate measure of accuracy, but agrees that the standard is parity. 2. Mean Time to Deliver Invoices 3. Usage Data Delivery Accuracy AT&T Comments: AT&T believes that this measure will result in an inadequate measure of accuracy. BellSouth indicates that this is a parity measure. Therefore, a retail analog should be used. 4. Usage Data Delivery Completeness AT&T Comments: BellSouth indicates that this is a parity measure. Therefore, a retail analog should be used. 5. Usage Data Delivery Timeliness AT&T Comments: BellSouth indicates that this is a parity measure. Therefore, a retail analog should be used. 6. Mean Time to Deliver Usage AT&T Comments: Although included in its SQM, BellSouth provides no data for this measure. AT&T requests that data be provided, and as BellSouth indicates that this is a parity measure, a retail analog should be used. NOTE: AT&T requests that the tester confirm that these are parity measures.

Collocation	1. Average Response Time 2. Average Arrangement Time 3. % of Due Dates Missed AT&T Comments: AT&T supports the recommendation made in the December 17, 1999 workshop that the decision of the Florida Commission in its collocation docket be used for these measures, if available in a timely manner.

CERTIFICATE OF SERVICE
DOCKETS 981834-TP and 960786-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via U.S. Mail to the following parties of record on this 22nd day of December, 1999:

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