



Public Service Commission

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RECORDS AND REPORTING

DATE: February 16, 2000

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM: DIVISION OF COMMUNICATIONS (FAVORS) *CAF*
DIVISION OF AUDITING AND FINANCIAL ANALYSIS (HARVEY, *HW*)
STALLCUP (VINSON) *CW*
DIVISION OF LEGAL SERVICES (B. KEATING, *BK* VACCARO) *W*

RE: DOCKET NO. 981834-TP - PETITION OF COMPETITIVE CARRIERS FOR COMMISSION ACTION TO SUPPORT LOCAL COMPETITION IN BELLSOUTH TELECOMMUNICATIONS, INC.'S SERVICE TERRITORY.

DOCKET NO. 960786-TL - CONSIDERATION OF BELLSOUTH TELECOMMUNICATIONS, INC.'S ENTRY INTO INTERLATA SERVICES PURSUANT TO SECTION 271 OF THE FEDERAL TELECOMMUNICATIONS ACT OF 1996.

AGENDA: 2/29/00 - REGULAR AGENDA - PROPOSED AGENCY ACTION - INTERESTED PERSONS MAY PARTICIPATE.

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: THESE DOCKETS ARE CONSOLIDATED FOR PURPOSES OF OSS TESTING. ALTHOUGH A PANEL IS ASSIGNED TO DOCKET NO. 981834-TP, THE FULL COMMISSION SHOULD VOTE ON THE ISSUES HEREIN BECAUSE THE DOCKETS HAVE BEEN CONSOLIDATED FOR THIS PURPOSE.

FILE NAME AND LOCATION: s:\PSC\AFA\WP\981834C.RCM

ATTACHMENT I NAME AND LOCATION: s:\PSC\AFA\WP\ANALOG.DOC (MS WORD)

ATTACHMENT II NAME AND LOCATION: s:\PSC\AFA\WP\APPENDC.WPD

DOCUMENT NUMBER-DATE

02149 FEB 17 8

FPSC-RECORDS/REPORTING

CASE BACKGROUND

On December 10, 1998, the Florida Competitive Carriers Association (FCCA), the Telecommunications Resellers, Inc. (TRA), AT&T Communications of the Southern States, Inc. (AT&T), MCI Metro Access Transmission Services, LLC (MCI Metro), Worldcom Technologies, Inc. (Worldcom), the Competitive Telecommunications Association (Comptel), MGC Communications, Inc. (MGC), and Intermedia Communications Inc. (Intermedia) (collectively, "Competitive Carriers") filed their Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory.

On December 30, 1998, BellSouth Telecommunications, Inc. (BellSouth) filed a Motion to Dismiss the Petition of the Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. BellSouth requested that the Commission dismiss the Competitive Carriers' Petition with prejudice. On January 11, 1999, the Competitive Carriers filed their Response in Opposition to BellSouth's Motion to Dismiss.

At the March 30, 1999, Agenda Conference, the Commission approved Staff's recommendation to deny BellSouth's Motion to Dismiss. In addition, the Commission denied the Competitive Carriers' request to initiate a rulemaking proceeding to establish expedited dispute resolution procedures for resolving interconnection agreement disputes. The Commission also directed Staff to provide more specific information and rationale for its recommendation on the remainder of the Competitive Carriers' Petition.

On May 26, 1999, the Commission issued Order No. PSC-99-1078-FOF-TP, which granted in part and denied in part the petition of the Florida Competitive Carriers Association to support local competition in BellSouth's service territory. Specifically, the Commission established a formal administrative hearing process to address unbundled network elements (UNE) pricing, including UNE combinations and deaveraged pricing of unbundled loops. The Commission also ordered that Commissioner and Staff workshops on Operations Support Systems (OSS) be conducted concomitantly in an effort to resolve OSS operational issues. The Commission indicated that the request for third-party testing of OSS was to be addressed in these workshops. These workshops were held on May 5-6, 1999. The Commission also ordered a formal administrative hearing to address collocation and access to loop issues, as well as costing and pricing issues.

On May 28, 1999, FCCA and AT&T filed a Motion for Independent Third-Party Testing of BellSouth's OSS. BellSouth filed its Response to this Motion by the FCCA and AT&T on June 16, 1999. That same day, FCCA and AT&T filed a Supplement to the Motion for Third-Party Testing. On June 17, 1999, ACI Corp. (ACI) filed a Motion to Expand the Scope of Independent Third-Party Testing. On June 28, 1999, BellSouth responded to the Supplement filed by FCCA and AT&T. On June 29, 1999, BellSouth responded to ACI's Motion to Expand the Scope of Independent Third-Party Testing. By Order No. PSC-99-1568-PAA-TP, issued August 8, 1999, the Commission denied the motion. Upon its own motion, the Commission approved Staff's recommendation to proceed with Phase I of third-party testing of BellSouth's OSS. Phase I of third-party testing required a third party, in this case KPMG, to develop a Master Test Plan (MTP) that would identify the specific testing activities necessary to demonstrate nondiscriminatory access and parity of BellSouth's systems and processes.

By Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, the Commission approved the KPMG MTP and initiated Phase II of third-party testing of BellSouth's Operations Support Systems. In order to initiate testing, the Commission must approve interim performance metrics to be used during the course of testing to assess the level of service BellSouth is providing to ALECs. There are three components to the development of performance metrics. The first component is the performance metrics themselves and the calculations. The second component is retail analogs and performance target benchmarks. The third component is the statistical methodology to be used in analysis of test results. By Order No. PSC-00-0260-PAA-TP, issued February 8, 2000, the Commission approved the interim performance metrics and their calculations. This is Staff's recommendation for the retail analogs/benchmarks and the statistical methodology that should be used during the OSS third-party testing. Once interim performance metrics standards are established, KPMG can begin to define the process for capturing the required measurement data.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission approve the retail analogs and benchmarks developed by KPMG?

RECOMMENDATION: Yes. Staff believes the retail analogs and benchmarks developed by KPMG (Attachment I) should be approved by the Commission. (HARVEY, STALLCUP, VINSON)

STAFF ANALYSIS: Performance standards, also known as retail analogs and benchmarks, are the yardstick by which the existence of nondiscrimination or parity will be determined during the OSS third-party testing. During the development of the master test plan, several ALECs filed comments regarding the adequacy and completeness of the performance metrics and standards proposed by BellSouth. In response, Staff initiated a process for obtaining input regarding the metrics to be used for the purposes of testing. An Interim Performance Metrics Work Group, comprised of representatives of the Commission, BellSouth, and the ALEC community, has been established. This work group participated in three workshops and has had four opportunities for comment regarding the retail analog and benchmarks. Workshops were held on December 1, 1999; December 17, 1999; and January 28, 2000. The resulting retail analog and benchmarks are shown in Attachment I.

In establishing these retail analogs and benchmarks, the Commission staff and KPMG opted for retail analogs whenever possible to allow parity determinations to be made against actual BellSouth performance. In those cases where no retail analogs were available, benchmarks were developed based on input from BellSouth and the ALECs. Staff also reviewed BellSouth's historical performance and benchmarks that were established in other jurisdictions. Staff believes that the recommended benchmarks represent reasonable OSS performance standards that will afford ALECs a meaningful opportunity to compete in the local exchange market. The proposed retail analogs and benchmarks address the products and services BellSouth currently provides to ALECs. During the duration of the test, additional products may become available. At that time, Staff will return to the Commission with any necessary changes or revisions to the performance measures or standards.

Staff notes that the interim retail analogs and benchmarks used during testing can serve as the starting point for developing permanent analogs and benchmarks once testing proves whether or not the standards are adequate.

Based on the foregoing, Staff recommends that the Commission approve the retail analog and benchmarks developed by KPMG, as set forth in Attachment I.

ISSUE 2: Should the Commission approve the statistical methodology developed by KPMG?

RECOMMENDATION: Yes. Staff believes the statistical methodology developed by KPMG (Attachment II) should be approved by the Commission. (HARVEY, STALLCUP, VINSON)

STAFF ANALYSIS: Staff and KPMG's proposed statistical methodology is based upon the joint efforts of BellSouth and ALEC statisticians. The methodology has evolved from work begun in other jurisdictions and incorporates two important safeguards which help ensure that the Florida tests yield a fair evaluation of the performance of BellSouth's OSS systems. These safeguards are based upon the comments and suggestions received at the Staff workshop held on January 28, 2000. In order to include these safeguards into the statistical methodology already approved in Order No. PSC-00-0104-PAA-TP, Staff recommends that Appendix C of the Master Test Plan be amended as shown in Attachment II.

The first recommended safeguard to be included into KPMG's statistical methodology takes into consideration, and attempts to balance, the risks both BellSouth and the ALECs could be exposed to due to the randomness inherent in any sampling process. This safeguard protects ALECs from the risk that the tests show that parity exists when in fact it does not exist. Conversely, it also protects BellSouth from the risk that the test shows that parity does not exist when, in fact, it does. While the risk of reaching an incorrect conclusion cannot be eliminated entirely in a sampling environment, the statistical methodology proposed by KPMG strives to equalize and minimize the likelihood of either erroneous conclusion.

The second safeguard incorporated into KPMG's proposed methodology is the inclusion of a method to detect the presence of measurement bias which could occur during testing. This bias could arise if KPMG's test transactions are handled differently in BellSouth's OSS systems than the transactions originating from the

general ALEC community. KPMG's proposed methodology includes a statistical comparison of the aggregate ALEC data to the retail analogs/benchmarks as well as a comparison of their own test results to the retail analogs/benchmarks. This dual comparison of the performance provided by BellSouth to both KPMG and the general ALEC community provides a basis to detect if the KPMG test results are representative of the experiences of the ALEC community as a whole.

Staff believes that adoption of KPMG's proposed statistical methodology as described in Attachment II will provide a fair and balanced evaluation of the performance of BellSouth's OSS systems.

ISSUE 3: Should these dockets be closed?

RECOMMENDATION: No. Whether or not the Commission approves Staff's recommendations in Issues 1 and 2, these Dockets should remain open to address the issues raised in FCCA's Petition for Commission Action to Support Local Competition in BellSouth's Service Territory and BellSouth's compliance with Section 271. If the Commission approves Staff's recommendations in Issues 1 and 2, the Commission's decision on these issues will become final upon issuance of a consummating order if no person whose substantial interests are affected files a timely protest. (VACARRO)

STAFF ANALYSIS: Whether or not the Commission approves Staff's recommendations in Issues 1 and 2, these Dockets should remain open to address the issues raised in FCCA's Petition for Commission Action to Support Local Competition in BellSouth's Service Territory and BellSouth's compliance with Section 271.

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Pre-Ordering	Average Response Time – Telephone Number Availability and Reservation <ul style="list-style-type: none"> • Average Response Time – Cust. Serv. Record • Average Response Time – Due Date Avail • Average Response Time – Address Validation • Average Response Time – Prod. & Serv. Avail • Average Response Time – Telephone Number Availability and Reservation 	Parity with retail Parity with retail Parity with retail Parity with retail Parity with retail	
	OSS Interface Availability		99.5%*
Ordering	Percent Flow-Through Service Request <ul style="list-style-type: none"> • Residence • Business • UNE • Special 		95% 95% 95% 95%
	Percent Rejected Service Request	Diagnostic*	Diagnostic*
	Reject Interval <ul style="list-style-type: none"> • Mechanized • Non-Mechanized and Partially Mechanized 		97% <= 1 hr 85% < 24 hrs
	Firm Order Confirmation Timeliness <ul style="list-style-type: none"> • Mechanized • Non-Mechanized and Partially Mechanized 		95% <= 3 hrs 85% < 36 hrs
	Speed of Answer in Ordering Center	Parity with retail *	
Provisioning	Mean Held Order Interval		
	<ul style="list-style-type: none"> • Resale Residence 	Parity with retail*	
	<ul style="list-style-type: none"> • Resale Business 	Parity with retail*	
	<ul style="list-style-type: none"> • Resale Design 	Parity with retail*	
	<ul style="list-style-type: none"> • Resale PBX 	Parity with retail*	
	<ul style="list-style-type: none"> • Resale Centrex 	Parity with retail*	
	<ul style="list-style-type: none"> • Resale IDSN • UNE Loop and Port Combos 	Retail Residence and Business	

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Provisioning Continued	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business		
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business		
	• UNE Loop Other with NP Non-Design	Retail Residence and Business		
	• UNE Loop Other without NP Non-Design	Retail Residence and Business		
	• UNE Other Non Design	Retail Residence and Business		
	• UNE 2w Loop with NP – Design	Retail Residence and Business		
	• UNE 2w Loop without NP – Design	Retail Residence and Business		
	• UNE Loop Other with NP – Design	Retail Design		
	• UNE Loop Other without NP – Design	Retail Design		
	• UNE Other Design	Retail Design		
	• Local Interconnection Trunks	Parity with retail		
	• Switching	Retail POTS		
	• Local Transport	Retail DS1 or DS3 as appropriate		
	Average Jeopardy Notice Interval (Mechanized)			
	• Resale Residence		95% >=48 Hrs.	
	• Resale Business		95% >=48 Hrs.	
	• Resale Design		95% >=48 Hrs.	
	• Resale PBX		95% >=48 Hrs.	
	• Resale Centrex		95% >=48 Hrs.	
	• Resale IDSN		95% >=48 Hrs.	
	• UNE Loop and Port Combos		95% >=48 Hrs.	
	• UNE 2w Loop with NP – Non-Design		95% >=48 Hrs.	
	• UNE 2w Loop without NP – Non-Design		95% >=48 Hrs.	
	• UNE Loop Other with NP Non-Design		95% >=48 Hrs.	
	• UNE Loop Other without NP Non-Design		95% >=48 Hrs.	
	• UNE Other Non Design		95% >=48 Hrs.	
	• UNE 2w Loop with NP – Design		95% >=48 Hrs.	
	• UNE 2w Loop without NP – Design		95% >=48 Hrs.	
• UNE Loop Other with NP – Design		95% >=48 Hrs.		
• UNE Loop Other without NP – Design		95% >=48 Hrs.		

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Provisioning Continued	• UNE Other Design		95% >=48 Hrs.
	• Local Interconnection Trunks		95% >=48 Hrs.
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	% of Orders Given Jeopardy Notice (Mechanized)		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Percent Missed Installation Appointments		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Provisioning Continued	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Order Completion Interval		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Provisioning Continued	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Average Completion Notice Interval (Mechanized)		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Percent Provisioning Troubles within 30 Days		
	• Resale Residence	Parity with retail	

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Provisioning Continued	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
Total Service Order Cycle Time	Diagnostic	Diagnostic	
Maintenance	Customer Trouble Report Rate		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Maintenance Continued	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Customer Trouble Report Rate		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Maintenance Average Duration		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Maintenance Continued	• Resale Centrex	Parity with retail		
	• Resale IDSN	Parity with retail		
	• UNE Loop and Port Combos	Retail Residence and Business		
	• UNE 2w Loop – Non-Design	Retail Residence and Business		
	• UNE Loop Other – Non-Design	Retail Residence and Business		
	• UNE Other Non Design	Retail Residence and Business		
	• UNE 2w Loop – Design	Retail Residence and Business		
	• UNE Loop Other – Design	Retail Design		
	• UNE Other Design	Retail Design		
	• Local Interconnection Trunks	Parity with retail		
	• Switching	Retail POTS		
	• Local Transport	Retail DS1, or DS3 as appropriate		
	Percent Repeat Troubles within 30 Days			
	• Resale Residence	Parity with retail		
	• Resale Business	Parity with retail		
	• Resale Design	Parity with retail		
	• Resale PBX	Parity with retail		
	• Resale Centrex	Parity with retail		
	• Resale IDSN	Parity with retail		
	• UNE Loop and Port Combos	Retail Residence and Business		
	• UNE 2w Loop – Non-Design	Retail Residence and Business		
	• UNE Loop Other – Non-Design	Retail Residence and Business		
	• UNE Other Non Design	Retail Residence and Business		
	• UNE 2w Loop – Design	Retail Residence and Business		
	• UNE Loop Other – Design	Retail Design		
	• UNE Other Design	Retail Design		
	• Local Interconnection Trunks	Parity with retail		
	• Switching	Retail POTS		
	• Local Transport	Retail DS1, or DS3 as appropriate		

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
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Maintenance Continued	Out of Service > 24hrs		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1,or DS3 as appropriate	
	OSS Interface Availability		
	• All systems except ECTA	Parity with retail*	
	• ECTA		99.5%*
OSS Response Interval and %			
• TAFI (Front End)	Parity with retail*		
• CRIS, DLETH, DLR, OSPCM, LMOS, LMOSUP, MARCH, Predictor, SOCS, LNP (Parity by Design)	Parity by Design*		
Average Answer Time – Repair Center	Parity with retail		
Billing			
Invoice Accuracy	Parity with retail*		
Mean Time To Deliver Invoices	Parity with retail*		
Usage Data Delivery Accuracy	Parity with retail		

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Billing Continued	Usage Data Delivery Completeness	Parity with retail	
	Usage Data Delivery Timeliness	Parity with retail	
	Mean Time to Deliver Usage	Parity with retail	
Operator Services (Toll)	Average Speed to Answer	Parity by Design	
	% Answered in "X" Seconds	Parity by Design	
Directory Assistance	Average Speed to Answer	Parity by Design	
	% Answered in "X" Seconds	Parity by Design	
E911	Timeliness	Parity by Design	
	Accuracy	Parity by Design	
	Mean Interval	Parity by Design	
Trunk Group Performance (Blockage)	Trunk Group Service Report (Percent Trunk Blockage) Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% = a miss using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BST.	Parity with retail	
	Trunk Group Service Report (Percent Trunk Blockage)	Parity with retail	
LNP	Average Disconnect Timeliness Interval		95% < 15 min
	Percent Missed Installation Appointments	Retail Residence and Business	
	FOC (Mechanized)		95% <= 3 hrs
	Non-Mechanized and Partially Mechanized		85% < 36 hrs
	% Reject Service Request	Diagnostic	Diagnostic
	Average Reject Interval (Mechanized) Non-Mechanized and Partially Mechanized		97% <= 1 hr 85% < 24hrs
TSOC		Diagnostic	Diagnostic

Appendix C: Statistical Approach

A. Overview

This test will rely on standard statistical methods to evaluate BST performance. Each test will define the data population to be observed, the measurements to be taken, and the statistical tests to be used. Data will be normalized, tabulated, and archived in a way that allows verification of test results and re-analysis of data using additional statistical methods, if appropriate.

B. Measures

The measures (metrics and their associated standards) that will serve as parameters for testing will be listed in Appendix D.

C. Sampling

In instances where sampling is used, sampling will be designed so that samples are sufficiently representative of populations with respect to the measures being studied to ensure that the resulting statistical inferences made about populations are valid. For most tests, simple random sampling will be used.

D. Hypothesis Testing

This test will employ a hypothesis testing approach to frame the analysis of test results. The standard “null” hypothesis will be that BellSouth is performing adequately. The possibility of an error arises if this hypothesis is rejected when it is true (Type I error) or is accepted when it is false (Type II error). ~~An attempt will be made to balance Type I and Type II errors as much as it is feasible.~~ **The hypothesis tests will balance Type I and Type II errors whenever feasible.**

E. Parity Tests and Non-Parity Tests

There are two basic types of tests. Parity tests compare a BellSouth retail average or percentage to a CLEC or test transaction average or percentage. The typical test for this type of comparison is a hypergeometric test for percentages and a two-sample t-test or z-test for averages. For those parity tests where sufficiently large samples can be drawn, hypothesis testing will be done by performing a “z-test” to calculate a “z-score.” A z-score is a single number, which indicates the differences between sample data. A low z-score supports the hypothesis of parity (i.e., both CLEC and ILEC performance are from the same “population” in terms of performance). In cases where this test is not appropriate due to small sample size (for tests of averages) or assumption violations, other tests, such as permutation tests, will be performed.

Non-parity tests compare a percentage or average to a fixed standard or benchmark. In this case, the typical test is a binomial test or a one-sample t-test. Once again, alternative statistical tests will be used, where appropriate, based on tests of assumptions and sample sizes.

F. Results

~~Test results will include a summary of the statistics calculated, the hypotheses postulated for the test, and the conclusion(s) drawn based on the statistical results. The tests will compare KMPG pseudo-CLEC performance measurements to the analogs/benchmarks described in Appendix D. The tests will also compare aggregate CLEC performance measurements to the analogs/benchmarks described in Appendix D. Conclusions will be drawn from the outcomes of these statistical hypothesis tests.~~

**Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.**

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark

Customer Coordinated Conversions	% Flow Through		95%
	Coordinated Customer Conversions – UNE Loop		95% ≤ 15 min*
	Coordinated Customer Conversions – LNP		95% ≤ 15 min*
Collocation	Average Response Time	This is being addressed in FPSC Docket 980800	
	Average Arrangement Time	This is being addressed in FPSC Docket 980800	
	% of Due Dates Missed		90% ≤ Commit Date

Note: The retail analog for UNE Non-Design and UNE 2w Loops – Design is the average of Retail Residence Dispatch and Retail Business Dispatch transactions for the particular month. The retail analog for other UNE Design is Retail Design Dispatch.

* Denotes a retail analog or benchmark that has previously been approved by the Florida Public Service Commission.