

ORIGINAL

Legal Department

RECEIVED-FPSC

00 APR 28 PM 4:33

RECORDS AND REPORTING

J. PHILLIP CARVER  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

April 28, 2000

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 000121-TP (OSS)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Comments on Operations Support System Performance Assessment Plan, Staff's Initial Proposal, which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*J. Phillip Carver*  
(1/20)

J. Phillip Carver

AFA	<u>Havey</u>
APP	_____
CAF	_____
CMU	<u>2</u>
CTR	_____
EAG	_____
LEG	<u>1</u>
MAS	_____
OPC	_____
PRR	_____
SEC	<u>1</u>
WAV	_____
OTH	_____

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05281 APR 28 8

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the	)	Docket No. 000121-TP
Establishment of Operations Support	)	
Systems Permanent Performance	)	
Measures for Incumbent Local Exchange	)	
<u>Telecommunications Companies</u>	)	Filed: April 28, 2000

**BELLSOUTH TELECOMMUNICATION, INC.'S  
 COMMENTS ON OPERATIONS SUPPORT SYSTEM PERFORMANCE  
ASSESSMENT PLAN, STAFF'S INITIAL PROPOSAL**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files, pursuant to the Notice given by the Staff of the Florida Public Service Commission ("Commission") at the workshop held on March 30, 2000 in the above-captioned matter, its Comments on Operations Support System Performance Assessment Plan, Staff's Initial Proposal. In support thereof, BellSouth states the following:

**III. Administration**

The Staff has proposed that a Performance Assessment Plan be developed through a collaborative process in which Staff, ILECs and ALECs would participate. While a limited number of workshops may be useful, BellSouth is concerned that efforts to reach an industry-wide consensus will be very time consuming, but not very productive.

BellSouth and many of the interested parties in this proceeding have participated in Performance Measurements workshops in Louisiana and North Carolina. The Louisiana workshops began in October 1998. Eighteen months

DOCUMENT NUMBER-DATE

05281 APR 28 8

FPSC-RECORDS/REPORTING

later, the comment cycle has recently concluded, and a decision by the Louisiana Commission is expected in June or July, 2000. This decision will be necessary to resolve the many issues that remain in dispute. Also, the North Carolina Utilities Commission convened a Performance Measurements Task Force that began meeting in November 1999. The North Carolina Task Force is scheduled to make an initial report to the North Carolina Commission on areas of agreement and disagreement in June or July 2000. Substantial disagreements appear to exist, and a hearing will likely be needed.

Thus, the extensive industry-driven workshops in these two states have not produced a consensus. Since, for the most part, the same parties are involved in Florida, a consensus in this proceeding is, likewise, unlikely. Therefore, any workshops should be limited to those necessary to elicit and develop information that Staff believes is necessary to move the process forward, i.e., to allow the Staff to make a recommendation to the Commission.

#### **IV. Establishment of Performance Metrics and Standards**

BellSouth concurs in Staff's intent to focus on several key, customer oriented outcome metrics. BellSouth firmly believes the Commission should have the measurements necessary to detect discrimination and to do so in an efficient manner. Staff states in its proposal that it will consider 17 metrics in addition to those being evaluated during the current Florida testing of BellSouth's OSS. BellSouth believes that these additional metrics, and any other proposed additional metrics, should be critically evaluated to screen out those

measurements that are focused on processes/subprocesses rather than key outcome measurements. Similarly, BellSouth encourages Staff to avoid requirements for additional product reporting where the amount of activity for the product is proportionately small.

#### **V. Monitoring/Enforcement**

ALEC specific monitoring will always be available electronically to the Commission. However, in evaluating BellAtlantic's Application for 271 Authority, the FCC based its determination of compliance on aggregate results rather than individual CLEC results. Therefore, monitoring of individual ALEC results is not necessary to evaluate non-discriminatory access.

#### **VI. Review procedures**

BellSouth recommends an initial review of the Retail Analogs and Benchmarks six months after the establishment of Performance Measurements and associated Standards. This will allow any necessary refinements to the newly established standards. Thereafter, biannual reviews of the Performance Assessment Plan should be adequate. More frequent ongoing reviews (i.e., annual reviews) would create the potential that a particular review could not be completed before the next review is set to commence.

### **Attachment 1, Monitoring Performance Standards**

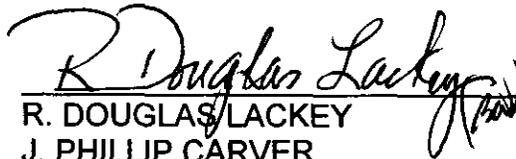
As BellSouth mentioned in the March 30, 2000 workshop, an ILEC should not be required to meet each individual standard in order to be viewed as compliant with the Federal Communications Act. The Act does not require perfection for every measurement in every month. The FCC reaffirmed this view in the recent BellAtlantic order. Rather, the Commission should evaluate performance as a whole, over an appropriate time period.

Respectfully submitted this 28<sup>th</sup> day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5555



R. DOUGLAS LACKEY  
J. PHILLIP CARVER  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0710

207305

**CERTIFICATE OF SERVICE  
Docket No. 000121-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 28th day of April, 2000 to the following:

Timothy Vaccaro  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

AT&T  
Marsha Rule  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301-1549  
Tel. No. (850) 425-6365  
Fax. No. (850) 425-6361

GTE Florida, Inc.  
Kimberly Caswell  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Tel. No. (813) 483-2617  
Fax. No. (813) 223-4888

Nanette Edwards  
Regulatory Attorney  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936

Scott A. Sapperstein  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619  
Tel. No. (813) 829-4093  
Fax. No. (813) 349-9802

Charles J. Pellegrini  
Wiggins & Villacorta, P.A.  
2145 Delta Boulevard  
Suite 200  
Post Office Drawer 1657  
Tallahassee, FL 32302  
Tel. No. (850) 358-6007  
Fax. No. (850) 358-6008  
Counsel for Intermedia

Peter M. Dunbar, Esquire  
Karen M. Camechis, Esquire  
Pennington, Moore, Wilkinson,  
Bell & Dunbar, P.A.  
Post Office Box 10095 (32302)  
215 South Monroe Street, 2nd Floor  
Tallahassee, FL 32301

Mark Buechele  
Legal Counsel  
Supra Telecom  
1311 Executive Center Drive  
Suite 200  
Tallahassee, FL 32301  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522

**Michael A. Gross**  
**Vice President, Regulatory Affairs**  
**& Regulatory Counsel**  
**Florida Cable Telecomm. Assoc.**  
**310 North Monroe Street**  
**Tallahassee, FL 32301**  
**Tel. No. (850) 681-1990**  
**Fax. No. (850) 681-9676**

**Susan Masterton**  
**Charles J. Rehwinkel**  
**Sprint**  
**Post Office Box 2214**  
**MS: FTLHO0107**  
**Tallahassee, Florida 32316-2214**  
**Tel. No. (850) 599-1560**  
**Fax. No. (850) 878-0777**

  
**J. Phillip Carver** (for)