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November 22, 2000

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BY HAND DELIVERY

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

Re: Docket No. 000121-TP

Dear Ms. Bayo:

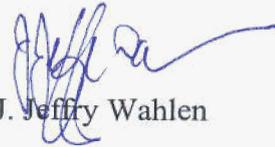
Enclosed for filing in the above docket are the original and fifteen (15) copies of Comments of ALLTEL Communications, Inc. on Staff's Initial Proposal of a Performance Assessment Plan.

We are also submitting the Comments on a 3.5" high-density diskette using Microsoft Word 97 format, Rich Text.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

Enclosures

cc: All parties of record

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FPSC-RECORDS/REPORTING

In Re: Investigation into the Establishment) DOCKET NO. 000121-TP
of Operations Support Systems Permanent)
Performance Measures for Incumbent Local) Filed: 11/22/00
Exchange Telecommunications Companies)

COMMENTS OF ALLTEL COMMUNICATIONS, INC.
ON STAFF'S DRAFT PROPOSAL OF A PERFORMANCE ASSESSMENT PLAN

ALLTEL Communications, Inc. ("ACI") hereby files the following Comments in response to Staff's draft proposal of a performance assessment plan issued November 3, 2000.

I. Introduction

As stated in previous comments, ACI believes the Commission has the authority to set performance standards on the level of service that incumbent local exchange carriers provide through operation support systems ("OSS") pursuant to the authority granted it under Chapter 364 and 120, Florida Statutes. Additionally, the Commission has the authority to require ILECs to report performance standard results on a regular basis and may assess penalties for non-compliance with established standards. However, such rules must recognize the differences among ILECs operating throughout Florida and the fact that not all ILECs should be subject to the same performance standards.

ACI supports the BellSouth Service Quality Measures (SQM), the Enforcement Measurements, the Benchmarks and Analogs, and statistical methodology, and the enforcement plan proposed by Staff in its proposed Performance Assessment Plan. ACI

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believes such a plan of performance measures and enforcement penalties is necessary to ensure the development of local competition.

In review of the proposed BellSouth SQM and the additional measures being considered, ACI determined that these covered most of the measures ACI considers necessary. Additional measures proposed by staff for consideration include three (3) measures that ACI strongly supports to be included in the final list of performance measures. ACI also proposes three (3) new measures that should be added. These additional measures are discussed below.

II. Additional Measures For Consideration

ACI supports all of the additional Staff proposed measures and strongly supports the inclusion of the following additional Staff proposed measurements: 1. Percent Service Loss from Early and late Cuts, 4. Percent Order Accuracy, and 7. Provisioning Troubles prior to Loop Acceptance. While all of the additional measures proposed by Staff are important, the above items have frequently impaired ACI's ability to timely establish local service for its end-user customers. Consequently, end-user customers in Florida seeking a choice in local service providers have become victims of missed service deadlines and/or service outages when orders are incorrectly processed, when existing service is disconnected prior to connection of new CLEC service, or when facilities are not provisioned correctly or available in time to meet established service dates.

III. ACI Proposed New Performance Measures

Additionally, ACI proposes three new performance measures we strongly recommend be included. They are Average Directory and Directory Assistance Listings

Database Update Interval, Percent of DA/Listing Database Accuracy, and Virtual Collocation Repair Timeliness.

Average Directory and Directory Assistance Data base Update Interval measurement is the average time that it takes to update Directory listings for adds, changes and deletes. This measure is proposed because of the customer impacts that occur when Directory listings are not updated promptly. When a customer is placed into service, calls for his new number to Directory Assistance (DA) are denied if the data is not forwarded to the DA Operator's system timely.

Percent of DA/Listing Database Accuracy measurement is the percent of accuracy of Directory adds, changes and deletes. The customer's listing accuracy is vital to ensuring that a customer's number, name, business, etc. can be located in the Directory. Since the directory is printed annually, any error has impacts to the customer for the year.

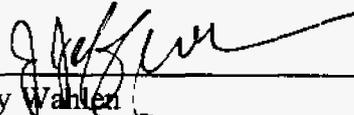
Virtual Collocation Repair Timeliness measurement is the mean time to repair a Virtual Collocation switch problem. In virtual collocation sites, an equipment malfunction is determined through alarms, customer reports, testing, etc. When this happens, the BellSouth Technician completes the replacement of the Printed Circuit Board (PCB). When delays in repairing the switching equipment are encountered, the customers served from that site experience degraded service or loss of service.

ACI has included as Attachment 1, detailed descriptions of the criteria necessary for the above three measures. ACI has found these performance measures to be essential to providing competitive local exchange service.

III. Conclusion

ACI supports Staff's additional proposed measures and of these strongly supports the inclusion of additional measurements 1, 4 and 7. ACI proposes three new performance measures be included as well. Performance measures and penalty assessments are necessary to protect the continued growth of local competition in Florida's telecommunications market.

DATED this 22nd day of November, 2000.



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Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 22nd day of November, 2000, to the following:

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