

ORIGINAL

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October 17, 2003

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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COMMISSION  
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Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of information that BellSouth is filing in response to a letter from Staff dated September 30, 2003. In this letter, Staff requested that BellSouth file an action plan to improve performance for certain specified measures in BellSouth's Performance Assessment Plan. We ask that you file these documents in the referenced docket. BellSouth is available to have a conference call with Staff to answer any questions regarding the enclosed, and to file any Supplemental information that Staff may request during this call.

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.

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM 5 \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

Sincerely,

*J. Phillip Carver (CB)*  
J. Phillip Carver

cc: All parties of record  
Marshall M. Criser, III  
Nancy B. White  
R. Douglas Lackey

RECEIVED & FILED

*R. D. L.*

FPSC-BUREAU OF RECORDS

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

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

First Class U. S. Mail this 17th day of October, 2003 to the following:

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**(+) Signed Protective  
Agreement**

#237366

# Florida Reject Interval & FOC Timeliness

**ISSUE:** “Results for Reject Interval and FOC Timeliness measurements indicate a consistent failure to achieve or approach established benchmarks.”

## REJECT INTERVAL

- BellSouth returned 97% of all rejects within specified benchmark for Jan – Jun 2003
- Returned over 210,000 of 217,000 rejected LSRs to the CLECs within the benchmark during 6-month period
- BellSouth met an average of 63% of the sub-metrics during the period. However, many sub-metrics are within a few LSRs of meeting benchmark. Many of the sub-metrics have small volumes and cannot meet the 95% or 97% benchmark with any missed intervals.
- Increasing the number of met LSRs by as few as 5 or less would increase the average of sub-metrics meeting the benchmark to 86% during the period. In May the percentage of sub-metrics meeting parity would have risen to 93%.

## FOC TIMELINESS

- BellSouth returned 98% of all FOCs within specified benchmark for Jan – Jun 2003
- Returned over 769,000 of 786,000 FOCs to the CLECs within the benchmark during 6-month period
- BellSouth met an average of 58% of the sub-metrics during the period. However, many sub-metrics are within a few LSRs of meeting benchmark. Many of the sub-metrics have small volumes and cannot meet the 95% benchmark with any missed intervals.
- Increasing the number of met FOCs by as few as 5 or less would increase the average of sub-metrics meeting the benchmark to 83% during the period. In May the percentage of sub-metrics meeting parity would have risen to 89%.

# Florida Reject Interval & FOC Timeliness

**ISSUE:** “Results for Reject Interval and FOC Timeliness measurements indicate a consistent failure to achieve or approach established benchmarks.”

## REJECT INTERVAL

- BellSouth continually reviews rejects that miss the benchmark requirements
- Reject Interval is divided into fully mechanized, partial mechanized and non mechanized LSRs
- While BellSouth continues to provide a high level of service, the partial mechanized method of submission meets the least amount of sub-metrics for the reject interval measure
- The June 2003 analysis has revealed three areas associated with the mechanized portion of the partially mechanized LSRs that are currently under investigation:
  - A difference between the Gateway time stamp and the source system time stamp indicates some LSRs are taking too long to transfer internally
  - Data indicates certain LSRs are being missed because of a non response to the facility check request
  - LSRs are dropping out for manual handling because of an error discovered after an FOC has been returned to the CLEC

## FOC TIMELINESS

- BellSouth continually reviews FOCs that miss the benchmark requirements
- FOC Timeliness is divided into fully mechanized, partial mechanized and non mechanized LSRs
- While BellSouth continues to provide a high level of service, the partial mechanized method of submission meets the least amount of sub-metrics for the FOC Timeliness measure
- The June 2003 analysis has revealed two areas associated with the mechanized portion of the partially mechanized LSRs that are currently under investigation:
  - A number of FOCs were entered into the system within the benchmark but were not counted correctly due to repeated attempts to respond to the CLEC
  - Data indicates certain LSRs are being missed because of system outage or delays between systems

# Florida Maintenance & Repair

**ISSUE:** “Of concern is a potential degradation of Maintenance & Repair service quality...”

- BellSouth met 652 of the 734 sub-metrics (89%) for all of the Maintenance and Repair measures for the period of January through June 2003.
  - January (115/130) 89%
  - February (118/130) 91%
  - March (117/130) 90%
  - April (88/100) 88%
  - May (107/120) 86%
  - June (107/120) 89%
  - Total (652/734) 89%
- Basically, 9 of every 10 sub-metrics with CLEC activity met or exceeded the retail analogue when reviewed at the state level for the aggregate CLEC experience
- Looking more closely at one of the five M&R measures, Customer Trouble Report Rate, BellSouth met or exceeded the retail analogue comparison for 121 of the 156 (78%) with CLEC activity during the same 6-month period.

# Florida Maintenance & Repair Customer Trouble Report Rate

**ISSUE:** “Staff notes consistent failure to provide parity service for UNE wholesale customers...UNE Digital Loop DS1, UNE Loop & Port Combo, and UNE Combo Other”

- Customer Trouble Report Rate is a measure of customer reports and not customer troubles. Even with all the reports that are closed as “no trouble found” included in the results, BellSouth continues to provide extremely high trouble-free service to both wholesale and retail.
- During the period of January through June 2003, BellSouth provided the CLECs with 98.52% trouble-free service rate for all of these lines compared with a 97.33% trouble-free rate for the retail analogues.
- The UNE Loop & Port Combinations make up over 70% of the CLEC in service base of lines. BellSouth met 100% of all sub-metrics for CTRR during the 6-month period and provided the CLECs with a 98.3% trouble-free service rate compared with a 97.5% rate for the retail analogue.
- Looking at the remaining 30% of the CLEC in service base, BellSouth provided a 99.05% trouble-free service rate for the CLECs compared with a 97.3% rate for the retail analogue.
- Even for the most complex services like EELs and DS1s, BellSouth provided the CLECs with over 96% trouble-free service during this period.



# **Florida Maintenance & Repair Customer Trouble Report Rate – SEEM**

**ISSUE:** “Staff notes consistent failure to provide parity service for UNE wholesale customers...UNE Digital Loop DS1, UNE Loop & Port Combo, and UNE Combo Other”

## **UNE LOOP & PORT COMBINATIONS**

- During the period of January through June 2003, BellSouth paid \$524,689 Tier 1 penalties for UNE Loop & Port Combinations for the CTRR measure
- There were a total of 96 separate payments for 2,391 lines
- 53 of the 96 (55%) payments had 10 or less reports each and 27 of the 96 (28%) had only 1 report each
- The 2,391 lines represent 0.07% (2,391/3,645,948) of the CLEC in service base during that 6-month period for UNE Loop & Port Combinations
- BellSouth paid over \$500,000 in Tier 1 penalties when it met or exceeded the retail analogue for over 99% of all UNE Loop & Port Combination lines in the state of Florida during the period of January through June 2003.
- With such low failure rates and many of the CLECs receiving payments for just 1 trouble, it would be very hard to change trends or have a business model that would predict TIER 1 payments.

# Florida Maintenance & Repair

## Customer Trouble Report Rate – SEEM

**ISSUE:** “Staff notes consistent failure to provide parity service for UNE wholesale customers...UNE Digital Loop DS1, UNE Loop & Port Combo, and UNE Combo Other”

### UNE COMBINATIONS - OTHER

- During the period of January through June 2003, BellSouth paid \$674,500 Tier 1 penalties for UNE Combinations - Other for the CTRR measure
- There were a total of 64 separate payments for 439 lines (>\$1500 per report)
- 58 of the 64 (90%) payments had 10 or less reports each and 19 of the 64 (30%) had only 1 report each
- The 439 lines represent 2.57% (439/17,115) of the CLEC in service base during that 6-month period
- BellSouth paid \$674,500 in Tier 1 penalties when it provided trouble-free service for over 97% of all UNE Combination -Other lines in the state of Florida during the period of January through June 2003.
- The current products and services included in UNE Combination Other consists mainly of EELS and other Designed combinations that are very complex. Almost 100% of these circuits are designed and consists of multiple facilities between customer locations and at least two central office locations. The current retail analogue for these circuits is residence, business and design which is over 90% POTS and tend to have less problems than design circuits.
- Basically, even with all of these issues, BellSouth provided the CLECs with 97% trouble-free service during this period.

# Florida Maintenance & Repair

## Customer Trouble Report Rate – SEEM

**ISSUE:** “Staff notes consistent failure to provide parity service for UNE wholesale customers...UNE Digital Loop DS1, UNE Loop & Port Combo, and UNE Combo Other”

### DIGITAL LOOPS >= DS1

- During the period of January through June 2003, BellSouth paid \$1,325,353 Tier 1 penalties for UNE Digital Loops >= DS1 for the CTRR measure
- There were a total of 109 separate payments for 1498 lines
- 53 of the 109 (49%) payments had 10 or less reports each and 15 of the 109 (14%) had only 1 report each
- The 1498 lines represent 2.81% (1498/53,242) of the CLEC in service base during that 6-month period
- BellSouth paid over \$1,325,000 in Tier 1 penalties when it provided trouble-free service for over 97% of all Digital lines >= DS1 in the state of Florida during the period of January through June 2003.
- The major difference between the CLEC lines and the retail analogue is the location and method of service. Many of the CLEC DS1s are serviced by copper that require signal regeneration with external equipment compared with the retail analogue service that is served mainly by fiber optics. The copper cable with regeneration equipment has a slightly higher failure rate than the fiber optic equipment.
- Basically, even with all of these issues, BellSouth provided the CLECs with 97% trouble-free service during this period.