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October 27, 2004

**BY ELECTRONIC FILING**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP

Dear Ms. Bayó:

Attached please find the CLEC Coalition's Reply to Action Items from the October 12 and 13, 2004, SEEM workshop in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

*s/ Tracy W. Hatch*

Tracy W. Hatch

TWH/las  
Attachment  
cc: Parties of Record

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the CLEC's Response was served

by U.S. Mail this 27th day of October 2004 to the following:

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*s/ Tracy W. Hatch*  
*Tracy W. Hatch*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the Establishment )	
of Operations Support System Permanent )	Docket No. 000121A-TP
Performance Measures for Incumbent )	
Local Exchange Telecommunications )	Filed: October 27 2004
Companies (BellSouth Track) )	
_____ )	

**CLEC COALITION REPLY TO ACTION ITEMS**

Competitive Local Exchange Carriers (“CLECs”), AT&T Communications of the Southern States, LLC; Birch Telecom; DIECA Communications Company d/b/a Covad Communications Company (“Covad”); ITC^DeltaCom Communications, Inc. (“ITC^DeltaCom/BTI”); MCI metro Access Transmission Services, LLC, MCI WorldCom Communications, Inc.; and Network Telephone Corp., hereinafter collectively referred to as the “CLEC Coalition,” hereby file the following responses to the Florida Public Service Commission Staff’s (“Staff’s”) request that answers be supplied for the following Action Items from the October 12 and 13, 2004 SEEM workshop:

**1. CLECs will provide data and an explanation to show how the B values were derived.**

Tables A.2 and A.3 of the CLEC Comments filed August 18, 2004 show “B” values needed to compute remedy amounts for benchmark and parity measures, respectively, under the CLEC proposed changes to the SEEM plan. These values were determined from analysis of the historical data available to CLECs on Tier I violations.

Values were designed to achieve rough comparability, for the historic data, between the CLEC proposed remedy amounts and the current fixed remedy amounts. Rather than attempt to achieve an unrealistic level of precision, the tables were simplified by specifying a handful of round values for *B*.

Table 1 compares average remedy amounts under the CLEC proposal with the current fixed remedy amount of \$450 for benchmark measures. The table summarizes calculations for all Tier I benchmark violations for the period March to May 2003.

Table 2 shows similar comparisons for parity measures, for a one year period, May 2002 to April 2003. Results are broken down by product group, since *B* values and current remedy amounts differ by product group. Because the CLECs do not have access to cell level data, which is required for calculation of the disparity index proposed by the CLECs for parity measures, the results in the Table 2 are based on use of the “old” disparity index supplied with the parity data.

Table 1  
Comparison of Current Fixed Remedy Amounts with Amounts under the CLEC Proposal for Benchmark Violations between March and May 2003, by Measure

Measure	Current Remedy	CLEC Prop, Median	CLEC Prop. Mean
AKC	450	693	982
ATE	450	322	322
FOCRC	450	296	400
FOCT	450	476	867
PFTSR	450	470	874
RI	450	452	707

Table 2  
Comparison of Current Fixed Remedy Amounts with Amounts under the CLEC Proposal for Parity Violations between May 2002 and April 2003, by Measure and Product Group

Measure	Product Group	Current Amount	CLEC Prop. Median	CLEC Prop. Mean
AOCCNI	LNP	1800	2277	2827
AOCCNI	PR	1200	598	1685
AOCCNI	PR-UNE	4750	4776	7513
CTRR	ICTRK	1200	960	1368
CTRR	MR	1200	1392	2284
CTRR	MR-UNE	4750	7999	9972
MAD	MR	1200	712	1260
MAD	MR-UNE	4750	2894	5213
OOS	MR	1200	1015	1424
OOS	MR-UNE	4750	3800	4883
PMIAIS	LNP	1800	1440	1628
PMIAIS	PR	1200	960	1752
PMIAIS	PR-UNE	4750	4743	7077
PMRA	MR	1200	960	1874
PMRA	MR-UNE	4750	3800	7191
PPT	PR	1200	1068	1785
PPT	PR-UNE	4750	4901	6666
PRT	MR	1200	1393	1779
PRT	MR-UNE	4750	4429	5449

**2. CLECs will provide a list of issues/ideas that merit further discussion at the next workshop.**

- Presentation of specific data to support the disaggregation proposed by BellSouth
- Impact of requiring two consecutive violations on error balancing
- Elimination of trimming in BellSouth proposal
- Clarification of BellSouth's proposed changes to Section C.2 (p. 76). Should "sum" be changed to "average" in the second to last sentence?
- Discussion of BellSouth's Response to Action Items dated October 20, 2004.
- Discussion of coefficients proposed by BellSouth in Row 43 of "non-technical matrix.

Respectfully submitted this 27<sup>th</sup> day of October, 2004.

**CLEC COALITION**

*s/ Tracy Hatch*

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