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November 12, 2004

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

Re: Docket No. 000121A-TP
**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

Enclosed for filing are BellSouth's supplemental responses to certain action item responses filed on September 13, October 14, and November 3, 2004. A copy of the same is being served on all parties of record.

Sincerely,



Robert A. Culpepper

Enclosures

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

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

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

Electronic Mail and U.S. Mail this 12th day of November, 2004 to the following:

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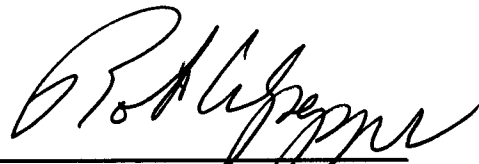
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**(+) Signed Protective
Agreement**

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BellSouth Telecommunications, Inc.
FPSC Dkt No. 000121A-TP
Response to 10/28/2004
SQM Workshop Action Items
November 12, 2004
Item No 1
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REQUEST: BellSouth's SQM Workshop Action Item No. 4 filing on 9/13/2004 included a proposed measurement for Order Completion Interval (OCI). In both the Business Rules and Calculation, does the term date timestamp mean BellSouth uses the time on the application date? BellSouth is to provide clarification.

RESPONSE: The data supplied for this measurement is in the 'date-time' field but for the current OCI and new FOCl measurements, only the date is populated in this field, not the date and time.
When the SQM plan is final, BellSouth will modify the Business Rules and Calculation to conform to the Commission order and will clarify the issue in the revised FOCl measure.

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REQUEST: BellSouth's SQM Workshop Action Item No. 4 filing on 9/13/2004 included a revision to the existing measure for Order Completion Interval (OCI) to be used if the Commission retained the OCI measure instead of adopting BellSouth's proposed FOCl measure. BellSouth proposed an interval of 6 days for xDSL without conditioning. BellSouth is to provide rationale for the change.

RESPONSE: For the OCI measure, BellSouth proposed an interval of 6 days for xDSL without conditioning to more accurately align the measure with the existing process as defined in the LESOG Interval Guide (dated September 16, 2004). BellSouth's Interval Guide has a standard interval of 5 business days for 1-5 loops and a standard interval of 7 business days for 6-14 loops. Since the breakpoint for reporting this measure is 10 circuits, BellSouth proposed an interval of 6 business days, midway between the two intervals listed in the guide.

REQUEST: From BellSouth's SQM Workshop Action Item No. 8 filing on 9/13/2004, BellSouth proposed to revise the performance standards for the UNE Other Design and UNE Other Non-Design product groups from retail analogs to diagnostic. BellSouth is to provide six months of performance results and volumes for these two product groups in FL for the following measurements: Order Completion Interval (OCI), Percent Missed Installation Appointments (PMI), Missed Repair Appointments (MRA), and Maintenance Average Duration (MAD).

RESPONSE: OCI, PMI, MRA, MAD Measures showing CLEC activity for each measurement. In summary, there is very little activity in either of these product groups.

OCI Measure – CLEC Volume of Orders				
Month	UNE Other Design		UNE Other Non Design	
	Dispatch	Non Dispatch	Dispatch	Non Dispatch
March '04	0	0	0	0
April '04	0	0	0	0
May '04	0	0	0	0
June '04	2	0	0	0
July '04	1	2	0	0
August '04	0	0	0	0

PMI Measure – CLEC Volume of Orders				
Month	UNE Other Design		UNE Other Non Design	
	Dispatch	Non Dispatch	Dispatch	Non Dispatch
March '04	0	0	0	0
April '04	0	0	0	1
May '04	1	0	1	0
June '04	2	0	0	0
July '04	1	2	0	0
August '04	0	0	0	0

MRA Measure – CLEC Volume of Troubles				
Month	UNE Other Design		UNE Other Non Design	
	Dispatch	Non Dispatch	Dispatch	Non Dispatch
March '04	0	0	0	0
April '04	0	0	1	0
May '04	0	0	0	0
June '04	0	0	2	0
July '04	0	0	2	0
August '04	0	0	1	0

MAD Measure – CLEC Volume of Troubles				
Month	UNE Other Design		UNE Other Non Design	
	Dispatch	Non Dispatch	Dispatch	Non Dispatch
March '04	0	0	0	0
April '04	0	0	1	0
May '04	0	0	0	0
June '04	0	0	2	0
July '04	0	0	2	0
August '04	0	0	1	0

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REQUEST: From BellSouth's SQM Workshop Action Item No. 10 filing on 9/13/2004 on P-7B, Coordinated Customer Conversions – Average Recovery Time, BellSouth reported 31 orders (September 2003 – July 2004) that had a recovery time greater than 5 hours. What was the average recovery time for the 31 orders?

RESPONSE: For the 31 orders that had a recovery time of greater than 5 hours, the average recovery time was 40 hours. This average was skewed by several orders that had unusually long recovery times. To illustrate the effect of the long duration orders on the average, of the 31 orders, half of them had a recovery time of 16 hours or less. For instance, one order had a recovery time of 146 hours, with 5 days (120 hrs.) due to 'no access' to the end user's equipment room. It appears that this order should have been excluded from this measurement as it incorrectly includes 'no access' time in the duration.

REQUEST: From BellSouth's SQM Workshop Action Item No. 10 filing on 9/13/2004 regarding P-7C, Hot Cut Conversions – Percent Provisioning Troubles Received within 7 Days of a Completed Service Order, BellSouth reported 208 troubles (September 2003 – July 2004) within 7 days of service order completion. How many of the 208 trouble reports would have been reported within 5 days, as BellSouth proposes?

RESPONSE: If the benchmark had been moved to 5 days for P-7C, Hot Cut Conversions – Percent Provisioning Troubles Received within 7 Days of a Completed Service Order, the number of reported troubles for this same period would have been 166. Due to the nature of the services where a hot cut is utilized, it is highly unlikely that these additional 42 troubles were associated with problems completing the hot cut.

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REQUEST: From BellSouth's SQM Workshop Action Item No. 10 filing on 9/13/2004 regarding P-13D, LNP Disconnect Timeliness (Non-Trigger), BellSouth reported P-13D performance of 75.47% of the non-trigger orders were handled in 4 hours or less. What is the average disconnect time for these 75.47% of the orders?

RESPONSE: For the period, Sept. 2003 through July 2004, the average time for these orders was 35.6 minutes.

REQUEST: BellSouth's 10/14/04 response to SQM Workshop Action Item No. 2 revised on 11/3/2004 included a list of parity measures where BellSouth does not use truncated Z in SEEMs. For those measures BellSouth is to provide 1) proposed language for the SEEM administrative plan to clearly state that the truncated z statistic is not used, and 2) provide an example for the SEEM calculations for one of those measurements.

RESPONSE: 1) In the current SEEM plan, in Appendix C, Section C.2, this second paragraph will be added after the one that is currently there:

"Additionally, there are measures that are compared to a retail analog at least in part where cell definitions do not exist that permit assignment of data for these measures to cells so the truncated z statistic cannot be calculated. These measures are:

Average Response Interval (M&R)
Billing Invoice Accuracy
Billing Invoice Timeliness
Usage Data Delivery Accuracy
Speed of Answer in the Ordering Center

In addition there are two measurements that use retail results 'plus' (2 seconds for OSS Response Time; 0.5% for Trunk Blocking) resulting in a benchmark standard. These measurements are: OSS Average Response Time & Response Interval (Preordering) Trunk Group Performance."

When the SEEM plan is final, BellSouth will modify the above language to conform to the Commission Order and will place the revised language in the SEEM Administrative Plan.

2) The example is provided for the measure Billing Invoice Accuracy.

In Florida, BellSouth calculates results by subtracting the **Absolute Value of Total Billing Related Adjustments during current month** from the **Absolute Value of Total Billed Revenues during current month** then dividing these results by the **Absolute Value of Total Billed Revenues during current month** and multiplying these results by 100.

$$\text{Invoice Accuracy} = [(a-b)/a] \times 100$$

a = Absolute Value of Total Billed Revenues during current month

b = Absolute Value of Total Billing Related Adjustments during current month

Penalty Calculation

Example:

CLEC DATA

Bill Adjustments	\$14,660.00
Total Billed Revenue	\$366,529.00

BellSouth DATA

Bill Adjustments	\$6,018,969.26
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Total Billed Revenue	\$484,691,922.40
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$[(366,529.00-14,660.00)/366,529.00] \times 100 = 96.00$ CLEC Invoice Accuracy Ratio

$[(484,691,922.40-6,018,969.26)/ 484,691,922.40] \times 100 = 98.75$
ILEC Invoice Accuracy Ratio

CLEC result	96.00%
BellSouth result	98.75%

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In Florida once it is determined that the BST percent is higher, BellSouth pays the CLEC according to the Florida Fee schedule. In the above example, assume BellSouth has failed 3 consecutive months and therefore the fee is \$850 in the current plan.

Under BellSouth's proposed plan, the calculation would be 2% of the adjustment = $\$14,660 \times .02 = \293.20 .

When the SEEM plan is final, BellSouth will also modify the above example to conform to the Commission Order and will place the revised example in the SEEM Administrative plan.