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November 24, 1999

ORIGINAL

RECORDS AND REPORTING

99 NOV 24 PM 1:55

RECEIVED-PPSC

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

Re: BellSouth OSS Performance Metrics Docket Nos. 960786-TL
and 981834-TP

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen (15) copies of the comments of Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership regarding performance metrics using the September 15, 1999, BellSouth Service Quality Measures as the baseline metrics. By copy of this letter, this document has been provided to the parties on the attached service list.

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,

Charles J. Rehwinkel

cc: Parties of Record

Enclosures

- AFA _____
- APP _____
- CAF _____
- CML _____
- CTR _____
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- MAS _____
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- SEC _____
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WAW
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

14480 NOV 24 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive)
Carriers for Commission action)
to support local competition in)
BellSouth Telecommunications,)
Inc.'s service territory.)
_____)

Docket No. 981834-TP

In re: Consideration of)
BellSouth Telecommunications,)
Inc.'s entry into interLATA)
Services pursuant to Section 271)
of the Federal)
Telecommunications Act of 1996.)
_____)

Docket No. 960786-TL
Filed: November 24, 1999

**COMMENTS OF SPRINT-FLORIDA, INCORPORATED AND
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP
(HEREIN REFERRED TO COLLECTIVELY AS "SPRINT")
ON PERFORMANCE MEASUREMENTS AS PROPOSED BY BELL SOUTH**

Introduction

Sprint is interested in this proceeding both as an ALEC and as an ILEC. Sprint recognizes the critical importance of having standards in place to ensure that BellSouth gives Sprint (and other ALECs) parity of treatment and non-discriminatory treatment vis-à-vis other ALECs. At the same time, Sprint has extensive ILEC operations in Florida and 17 additional states, serving more than 7,000,000 access lines nationwide. As an ILEC, Sprint recognizes its obligations under the 1996 Act to provide parity and non-discriminatory treatment to ALECs that wish to compete in Sprint's ILEC service areas. Sprint understands the balance that must be maintained with implementing OSS measurements and reporting requirements benefiting Sprint's ALEC operations at the same time knowing the complexity of implementing them by ILECs.

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FPSC-RECORDS/REPORTING

Comments

Sprint supports the goals of the Local Competition User's Group ("LCUG") of which Sprint is a founding member. The LCUG proposal includes the measurements proposed by the FCC in its NPRM (docket 98-56). Sprint believes a measurement plan as outlined by the LCUG is capable of monitoring for discriminatory behavior and incorporates the following characteristics:

- 1) permits direct comparisons of the individual ALEC and ALEC industry experience to that of the ILEC through recognized statistical procedures;
- 2) accounts for potential performance variations due to differences in service and activity mix;
- 3) measures not only retail services but experiences with UNEs and OSS interfaces; and
- 4) produces results, which demonstrate that nondiscriminatory access to OSS functionality is being delivered across all interfaces and a broad range of resold services, unbundled elements and interconnection capabilities.

The measures established must address availability, timeliness of execution, and accuracy of execution.

- It is essential that a plan be developed to measure the ILEC's performance for all the OSS categories (e.g., pre-ordering, ordering and provisioning, maintenance and repair, network performance, unbundled elements, operator services and directory assistance, system performance, service center availability and billing).
- Performance measurements reporting should be disaggregated to ensure parity comparisons are meaningful. It is essential that ALECs be able to determine

that they are receiving treatment that is at least equal to the service ILECs provide to their own retail operations and their local service affiliates.

- Performance standards that are negotiated by the ALECs and ILECs, or ordered by the Commission, need to clearly demonstrate that new service providers are receiving service on reasonable terms that afford an efficient ALEC a meaningful opportunity to compete.
- Measurements and standards need to be reviewed on a regular basis, such as annually, to add, delete, or modify the list of measurements as the industry gains experience in market and service delivery methods.

While Sprint has no specific recommendations for changes to the baseline metrics at this time, Sprint offers the following general principles to provide guidance in the development of effective interim performance measures.

Prioritization of Sprint's Comments

The establishment of an effective performance measurement plan is analogous to a three-legged stool. The first leg is the definition of the measurements. Secondly, the standards must be agreed upon followed by an enforcement mechanism. The completion of an encompassing OSS third party test is paramount to the overall process.

Sprint Comment on Measurements

Sprint believes disaggregation for the proposed measurements must be at a level that allows the ALEC to ensure it is receiving parity service. This includes both geographic and product levels of disaggregation.

Sprint Comments on Standards

One of the most critical aspects of establishing an effective performance measurements plan is to define what and how the performance measurements are to be assessed for parity, or another way of stating this, what is the yardstick for success for this measurement? This yardstick is commonly referred to as the "standards".

Before we can go forward with an effective performance measurement plan that includes third party testing, BellSouth must provide appropriate benchmark studies to this proceeding. Only then can the parties respond, discuss and debate the specific parameters relevant to the establishment of performance benchmarks in the workshop forum.

Sprint Comments on Statistical Methodology

Sprint believes that the modified z test methodology proposed by LCUG would produce acceptable results. Sprint acknowledges that the LCUG methodology represents a slight refinement of generally accepted statistical procedures to eliminate the effects of variances in ALEC data from the calculations of the z score.

Conclusion

Sprint commends Staff for continuing to focus these proceedings on the establishment of performance measurements that ensure parity and non-discrimination. Sprint respectfully submits the above Comments to Staff for its consideration and plans to actively participate in the parties' workshop.

RESPECTFULLY SUBMITTED this 24th day of November 1999.

A handwritten signature in black ink, appearing to read "Charles J. Rehwinkel", is written over a horizontal line.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 24th day of November, 1999.

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