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COMMISSION  
CLERK

November 30, 2001

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. 000121-TP (OSS)

Dear Ms. Bayó:

Enclosed is an original and 15 copies of Supplemental Comments of BellSouth Telecommunications, Inc.'s, which we ask that you file in the captioned matter.

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.

Sincerely,

*J. Phillip Carver*  
J. Phillip Carver (2)

Enclosures

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM 5 \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
LEG \_\_\_\_\_  
OPC \_\_\_\_\_  
PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
SER \_\_\_\_\_  
OTH \_\_\_\_\_

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

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*[Signature]*  
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DOCUMENT NUMBER-DATE

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and (\*) Hand Delivery this 30th day of November, 2001 to the following:

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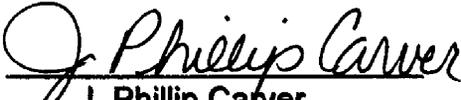
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J. Phillip Carver

**(+) Signed Protective  
Agreement**

#237366

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the ) Docket No. 000121-TP  
Establishment of Operations Support )  
Systems Permanent Performance )  
Measures for Incumbent Local Exchange )  
Telecommunications Companies ) Filed: November 30, 2001  
\_\_\_\_\_ )

SUPPLEMENTAL COMMENTS OF  
BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. (“BellSouth”) hereby respectfully files these Comments to Supplement the Comments filed in this proceeding on November 16, 2001, and states the following:

1. In its Comments filed November 16, 2001, BellSouth stated that, although it had met with appropriate ALEC representatives, the parties had been unable to agree as to the billing accuracy measure, B-9: Percent Daily Usage Feed Errors Corrected in X Business Days (a copy of Attachment A to BellSouth’s November 16, 2001 filing is attached as Exhibit A).

2. Since the November 16, 2001, Comments were filed, BellSouth and the representatives of the ALECs have held further discussions, and have now agreed upon the language to be included in the measurement. The measurement, B-9, including the agreed-upon language, is attached hereto as Exhibit B. The agreed measurement addresses the ALEC’s desire for a measure that captures the timely correction of Daily Usage Feed (DUF) EMI content errors, in addition to Daily Usage Pack format errors. This revised, agreed metric clarifies that BellSouth is measuring both the EMI content errors and pack failure errors, and defines each in the Business Rules section of the measurement.

3. The remaining portions of BellSouth’s November 16, 2001 filing are unchanged.

Respectfully submitted this 30th day of November, 2001.

  
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COUNSEL FOR BELLSOUTH  
TELECOMMUNICATIONS, INC.

422590

ATTACHMENT A:

Billing Accuracy Adjustment:

In its order of September 10, 2001, the Commission directed BellSouth to add a metric proposed by the ALECs, dealing with billing accuracy. The specific measurement that the Commission ordered was labeled "Percent Billing Errors Corrected in X Days." This measurement was proposed by Witness Kinard and is found in her Exhibit KK-4.

As BellSouth attempted to implement this metric, it became clear that there were several problems. Specifically, the metric actually implicates two separate and distinct issues, as can be seen from Ms. Kinard's exhibit. The ALECs want to measure the time in which BellSouth corrects errors in the Daily Usage Feed sent to the ALECs. Presumably the ALECs use this in some fashion to prepare the bills submitted to their customers. However, the ALECs also want to measure the timeliness of BellSouth's corrections to the bills that BellSouth sends to ALECs each billing period. Obviously these are two different things that BellSouth sends to the ALECs and they are not related. To resolve this issue, BellSouth proposed that the metric that the Commission ordered be separated into two separate metrics, one that deals with the Daily Usage Feed and the second that deals with the wholesale bill tendered by BellSouth to the individual ALECs each billing period.

In addition to the problem of combining two very different issues, the metric also presented some problems as the ALECs evidently wanted the metric applied. Once the Daily Usage Feed is generated, there are only two types of errors that can ever be corrected. First, the feed may have been in the wrong format, and if that occurs, the feed can be properly formatted and retransmitted. Second, there could be an error in the header/trailer that accompanies the feed. This is comparable to the information that might be found on the outside of an envelope that is used to communicate data. If the information in the header or trailer is in error, that can be fixed. What cannot be fixed is a problem with the data, since once the data is recorded, it is recorded and there is no way to go back and re-record the data. Therefore any metric that reflects corrections to the Daily Usage Feed has to be limited to these types of errors.

There were similar issues regarding the other metric, which should reflect the timeliness of corrections of errors that BellSouth has made in the wholesale bill tendered to the individual ALECs. Clearly there is the possibility that an error could be made, and when an error occurs, it should be corrected. BellSouth understands that it has reached agreement with Ms. Kinard as to the provisions of the metric dealing with the wholesale bills rendered to ALECs and that agreement is reflected in Exhibit 2 included with this Attachment.

BellSouth has continued to talk with Ms. Kinard regarding the Daily Usage Feed, but has been unable to reach complete agreement with the metric labeled B-9. As a result, since the parties were to file their comments on this issue by Friday, November 16,

2001, BellSouth has included as Exhibit 1 to this Attachment, its version of metric B-9, complete with exclusions, business rules, mode of calculation and all of the other items necessary to complete a metric.

# Billing

## B-9: Percent Daily Usage Feed Errors Corrected in X Business Days

### Definition

Measures the timely correction of Daily Usage Feed (DUF) errors in record information and Pack formats measured separately. Errors included (1) Pack Failure errors and (2) EMI content errors in records.

### Exclusions

Usage that cannot be corrected and resent or usage that the ALEC doesn't want Retransmitted.

ALEC Problem/Issue/File Retransmission forms disputed by BellSouth SMEs that do not result in an EMI error.

ALEC notification received by BellSouth > 10 business days from transmission date of errored messages or packs.

### Business Rules

This measure will provide the % of errors corrected in X Business days.

Pack Failure errors are defined as a DUF header/trailor error containing one or more of the following conditions: Grand total records not equal to records in pack or sequence/invoice numbers for a from RAO is not sequential

EMI content errors are defined as those records with errors contained in the EMI detail records that cause a message to be unbillable by the ALEC

Only notification received via the ALEC Problem/Issue/File Retransmission form ([http://www.interconnection.bellsouth.com/guides/other\\_guides/pdf/chapter1/ch1sec4](http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter1/ch1sec4).) will be included in this measure.

When circumstances arise for multiple content errors it is not necessary for the form to be filled out in its entirety, the ALECs agree to provide sufficient information for content error research so that a thorough investigation and resolution can be completed.

For each type error condition, a new ALEC Problem/Issue/File Retransmission form should be submitted.

EMI content errors should be attached in a separate file from the ALEC Problem/Issue/File Retransmission form

Elapsed time is measured in business days.

The clock starts when BellSouth receives ALEC's Problem/Issue/File Retransmission form.

The clock stops when BellSouth provides the corrected usage to the ALEC using the predesignated DUF delivery method.

This measure applies only to ALECs that are ODUF and ADUF participants

### Calculation

**Timeliness of Daily Usage EMI Content Errors Corrected** =  $(a \div b) \times 100$

- a = Total number of Daily Usage Records with EMI Content Errors Corrected in the reporting month within 10 Business Days.
- b = Total number of Daily Usage Records with EMI Content Errors corrected in reporting month.

**Timeliness of Daily Usage Pack Format Errors Corrected** =  $(a \div b) \times 100$

- a = Total number of Daily Usage Packs with Format Errors Corrected in the reporting month within 4 Business Days.
- b = Total number of Daily Usage Packs with Format Errors corrected in reporting month

### Report Structure

- ALEC Specific
- Total number of BST disputed Daily Usage Records with EMI Content Errors received in reporting month.
- Total number of Daily Usage Records with EMI Content Errors received in reporting month.
- Total number of BST disputed Daily Usage Packs with Format Errors received in reporting month

- Total number of Daily Usage Packs with Format Errors received in reporting month
- CLEC Aggregate
- Geographic Scope
  - Region

**Data Retained**

Relating to CLEC Experience	Relating to BellSouth Performance
<ul style="list-style-type: none"> <li>• Report month               <ul style="list-style-type: none"> <li>- BellSouth Recorded</li> <li>- Non-BellSouth Recorded</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

**SQM Level of Disaggregation - Analog/Benchmark**

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Region</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>