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October 14, 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 September 23, 2004 Informal Call regarding BellSouth's SQM Six-Month Review 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

<u>**CERTIFICATE OF SERVICE**</u>

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

U.S. Mail this 14th day of October 2004 to the following:

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

In re: Investigation into the Establishment	)	
of Operations Support System Permanent	)	Docket No. 000121A-TP
Performance Measures for Incumbent	)	
Local Exchange Telecommunications	)	Filed: October 14, 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"); MCImetro 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

September 23, 2004 SQM Six-Month Review conference call:

Action Item – Prepare corrected response for D-1 (Average Database Update Interval), D-2 (Percent Database Update Accuracy), and D-3 (Percent NXXs and LRNs Loaded Loaded by the LERG Effective Date).

Response: See Appendix A

Action Item -- Provide language that would be a better substitute for language ("outside BST's control) in BellSouth's exclusion for CM3 – Timeliness of Documents Associated With Change.

Response: See Appendix B.

Action Item – Provide examples of implementations of the B11- Billing Completion Notification metric from other ILECs.

Response: See Appendix C.

Action Item -- Revisit BellSouth's proposed language to displace "first prioritization" with "most recent prioritization" specified in the calculation.

Response: In the FPSC Staff's March 20, 2003 recommendation (page 24), the Staff stated, "Staff agrees with the ALEC coalition that the 60 week clock should begin with a prioritization and does not restart with subsequent prioritization. Prioritizations occur quarterly.   Pending change requests that are reprioritized at those junctures are due to BellSouth's failure to schedule them for release. To restart the CM-11 60 week cycle each twelve weeks would render the cycle meaningless."

BellSouth has produced no evidence that this finding is not accurate and appropriate. Further, in those cases where the CLEC agrees to an interval longer than 60 weeks, it can be excluded from the measurement using existing exclusion language. It is critical however, that BellSouth be held accountable when the delay is due to its own actions or inactions.

Action Item – Provide a benchmark recommendation for B5-Usage Data Delivery Timeliness.

Response: The CLEC Coalition proposes a benchmark of "95% within Four Calendar Days." This is the benchmark established in the Verizon remedy plan. An example of the Verizon SQM is shown in Appendix D. For the August 2004 data month, BellSouth delivered 98.62% of usage within 4 days. Additionally, BellSouth's reported performance states that over 99% of the usage has been delivered within 6 days for each of the last 12 months.

Respectfully submitted this 14th day of October, 2004.

<div align="center">

CLEC COALITION

</div>

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Appendix A

D-1
(BST matrix, p. 75)
-Delete Measure
Process is essentially Parity by Design.

CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECs and the FPSC to monitor BellSouth's performance.

REVISED CLEC RESPONSE: CLECs believe multiple databases are being used, but possibly not measured. The CLECs' End Users are commingled in the Directory published by the BellSouth publisher, which constitutes one database load. The Directory Assistance feed, namely LIDB, is another database. With BellSouth's National DA, it appears yet another database and update are applied. The fact that the measure is parity by design does not remove the need to monitor. Prompt updates are a requirement for CLEC End User directory listings and directory assistance listings.

D-2
(BST matrix, p. 76)
-Delete Measure
Accuracy of databases is also being assessed by the mechanized service order accuracy measurement.

CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECs and the FPSC to monitor BellSouth's performance.

REVISED CLEC Response – CLECs disagree. Service order accuracy measures accuracy between LSR (Local Service Request) and CRIS (Customer Record Information System) and excludes standalone directory listing orders. D-2 measures accuracy between completed service orders and LIDB, DA, and DL databases and includes standalone directory listing orders, which are excluded from the P-11 measure.

D-3
(BST matrix, p. 76)
-Delete Measure
Not a key measurement and BellSouth's performance has been excellent. If problems loading NXX and LRNs, problems would affect the M&R measurements.

CLECs DISAGREE. The fact that a measure is parity by design does not obviate the need for CLECs and the FPSC to monitor BellSouth's performance.

REVISED CLEC Response – CLECs disagree. First, good performance is an inadequate rationale for eliminating a measure. The fact that the performance is being measured could be the reason BellSouth is performing well. Second, the measure could get more usage with emphasis on facilities-based CLECs. Last, regarding maintenance, it is not clear whose performance would be affected. For example, BellSouth retail customers could call in a trouble on their own line indicating trouble calling other numbers.

APPENDIX B

(BST matrix pg. 82-83)

CM-3 (Timeliness Of Documentation Associated With Change
BellSouth Exclusions: "Documentation for the release dates that slip less than 30 days for reasons outside
BellSouth's control, such as changes due to Regulatory mandate."

CLECs disagree. BellSouth's language "outside of BellSouth's control" is too vague and ambiguous.
BellSouth must communicate changes to its vendors in order to alter software delivery and therefore
has ample opportunity to produce documentation 30 days in advance. Audits have shown BellSouth has
a detailed software development process, which requires documentation at many intervals. Further,
these changes are CLEC-impacting, and CLECs must either code or solicit vendor support in making
the corresponding OSS updates. Rarely would a regulatory body force BellSouth to make a change in
less than the 30 days. CLECs can accept the exclusion for Regulatory mandates, but not a generic
"outside of BellSouth's control." The Interconnection Agreements protect BellSouth from *force
majeure;* therefore, the exclusion of "or CLEC request" and Regulatory mandate should provide the
necessary exclusions for CM-3.

Verizon East (All except NJ's version may be slightly different now but moving to NY version soon.) OR-4 also includes metrics one PCN timeliness and when an order has had neither a BCN or PCN sent. OR-10 is sort of a MTTR on missing notifiers (which are mostly BCNs and PCNs, but can be FOCs too).

OR-4 Timeliness of Completion Notification	
Definition:	
Refer to the *Definition* listed next to each OR-4 sub-metric (OR-4-11, OR OR-4-17) for a description of the measurement included in the sub-met	
Exclusions:	
• Verizon Test Orders • Orders not received through the Verizon NetLink EDI system. This includes orders transmitted manually, orders received through the VAN EDI system, and orders submitted through the WEB GUI (LSI/W) • Special Project PONs (if applicable) per the process documented in Appendix S. • Sub-metric OR-4-11 *only* includes the following additional exclusion: Any product that is not designed to generate a PCN and a BCN.	
Performance Standard:	
For sub-metric OR-4-11; 0.25% of PONs that received neither a PCN nor a BCN within two (2) business days from the SOP posting of the provisioning of the last service order associated with a specific PON. **For sub-metric OR-4-16:** 95% of PCNs sent within one (1) business day. **For sub-metric OR-4-17:** 95% of BCNs sent within two (2) business days.	
Report Dimensions	

Company:	Geography:
• CLEC Aggregate • CLEC Specific	• New York

Sub-Metrics Timeliness of Completion Notification	
OR-4-01 through OR-4-10	**Metrics Not in Use in Verizon North**
OR-4-11	**% Completed orders with neither a PCN nor BCN sent**
Description	The percent of EDI PONs for which the last service order has been *provisioning completed* in the Verizon Service Order Processing (SOP) system. The elapsed time begins with the Provisioning completion in SOP of the last service order associated with a specific PON. The PCN and the BCN are considered sent when the Verizon Netlink system initiates the send of the completed notifier to the CLEC. The notifier is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to transmission to the CLEC. If no PCN and no BCN have been sent in two (2) business days after *provisioning completion*, the order will be captured here in this measure.
Products	CLEC Aggregate: • EDI
Calculation	**Numerator**	**Denominator**

	Number of EDI PONs completed that have produced neither a PCN nor a BCN within two (2) business days after the last service order has been updated as *provisioning completed* in SOP.	Total number of EDI PONs for which the last service order has been updated as *provisioning completed* in SOP in a month.

Sub-Metrics Timeliness of Completion Notification, continued	
OR-4-12 through OR-4-15	**Metrics Not in Use in Verizon North**
OR-4-16	**% Provisioning Completion Notifiers sent within one (1) Business Day**
Description	The percent of EDI Provisioning Completion Notifiers (PCNs) sent within one business day of work order completion (WFA completion date) in the Verizon Service Order Processing (SOP) system. The elapsed time begins with the Provisioning work completion (in WFA as noted in the Verizon SOP system) of the last service order associated with a specific PON. The PCN is considered sent when the Verizon Netlink system initiates the send of the completed notifier to the CLEC. The notifier is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to the transmission to the CLEC. The PCNs shall be considered to be timely if Verizon provides them within one business day of the Work Order Completion (WFA completion date) in SOP.
Products	**CLEC Aggregate:** • **EDI**

Calculation	Numerator	Denominator
	Number of EDI PONs completed that produce a PCN within one (1) business day after Work Completion in WFA.	Total number of EDI PONs for which the last service order has been updated as *provisioning completed* in the Service Order Processor (SOP) in a month.

OR-4-17	**% Billing Completion Notifiers sent within two (2) Business Days**
Description	The percent of EDI Billing Completion Notifiers (BCNs) sent within two (2) business days of the provisioning order completion in the Verizon SOP system. The elapsed time begins with the completion in the Verizon SOP system of the last service order associated with (provisioning) a specific PON. The BCN is considered sent when the Verizon Netlink system initiates the send of the completed notifier to the CLEC. The notifier is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to transmission to the CLECs. The BCNs shall be considered to be timely if Verizon provides them within two (2) business days of the Order Completion in SOP.
Products	**CLEC Aggregate:** • **EDI**

Calculation	Numerator	Denominator
	Number of EDI PONs completed that produce a BCN within two (2) business days after SOP provisioning completion update.	Total number of EDI PONs for which the last service order has been updated as *provisioning completed* in the Service Order Processor (SOP) in a month.

Function:	
OR-10 PON Notifier Exception Resolution Timeliness	
Definition:	

The OR-10 sub-metrics measure the percent of Netlink EDI PON Notifier Exceptions resolved within three (3) business days and ten (10) business days from the day of receipt of the completed PON Notifier Exception trouble ticket template with the PONs in question enumerated with the appropriate identification.

The elapsed time begins with receipt at the Verizon Wholesale Customer Care Center of a completed PON Notifier Exception trouble ticket template with the PONs in question enumerated with the appropriate identification for EDI notifiers (i.e., order

acknowledgement (ACK), order confirmation (LSC), provisioning completion (PCN), or billing completion (BCN) notices).

PON Notifier Exceptions received after 5:00PM will be considered received the next business day.

The PON Notifier Exception is considered resolved when Verizon has either:

1. Sent or resent the requested notifier or higher notifier. If the notifier cannot be resent due to CLEC system availability or capacity, then the PON Notifier Exception shall be considered resolved when the resend was attempted as demonstrated in Verizon's log files (copies of these files will be available to CLECs on request).

2. Requested the CLEC to resubmit the PON if no Verizon notifiers have been generated.

3. Completed the investigation showing that the next action is a CLEC action and that the CLEC has been sent or resent the notifier for the action required (E.g. Query, Jeopardy), or Status File for Duplicate, earlier or later version of PON has been worked, PON previously cancelled, invalid PON number.

4. Completed work that will allow the PON to proceed to the next step in the business process, and sent the appropriate notifier to the CLEC.

5. Notified the CLEC that the Confirmed Due Date plus the notifier production interval has not yet passed for requested PON Notifier (PCNs, and BCNs) and provided the current work status of the PON (i.e. Provisioning Completed, Notifier not yet produced). For PCNs and BCNs, Trouble Tickets are not to be initiated prior to or on the Confirmed Due Date; any Trouble Ticket initiated prior to the Confirmed Due Date is automatically considered resolved when the CLEC is provided with electronic notification that the initiation date is prior to the Confirmed Due Date.

CLEC notification for items 2, 3, 4, and 5, will be accomplished via a daily file sent from Verizon to the individual CLEC. This notification file will be sent every day by 5:00PM. For the purposes of this metric the PON Notifier Exception(s) trouble ticket templates for Acknowledgements must be submitted within five (5) business days of the PON sent date. PON Notifier Exceptions for confirmations must be reported within 30 business days of the PON sent date. PON Notifier Exceptions for PCNs, and BCNs must be reported to Verizon within 30 business days of the PON Confirmed Due Date.

Exclusions:
- Non NetLink EDI PON Exception Notifier Trouble Tickets.

- Any request for Notifier for orders due/complete more than 30 business days old.
- Orders for Products/Services that are not designed to produce the requested notifier (e.g. LIDB).

Performance Standard:
OR-10-01: 95% resolved within three (3) business days.
OR-10-02: 99% resolved within ten (10) business days.

Report Dimensions	
Company: • CLEC Aggregate • CLEC Specific	Geography: • New York These sub-metrics are reported at a state specific level.

Sub-Metrics	
OR-10-01	**% of PON Exceptions Resolved Within Three (3) Business Days**

Products for OR-10-01 and OR-10-02	All	
Calculation	**Numerator**	**Denominator**
	Number of PON Notifier Exceptions resolved within three (3) business days.	Total number of PON Notifier Exceptions resolved in the Wholesale Customer Care Center (WCCC) in the reporting month less resolved PON Notifier Exceptions that were included as unresolved PON Notifier Exceptions in the previous month's denominator for metric OR-10-02.
OR-10-02	**% of PON Exceptions Resolved Within ten (10) Business Days**	
Calculation	**Numerator**	**Denominator**
	Number of PON Notifier Exceptions resolved within ten (10) business days.	Total Number of PON Notifier Exceptions resolved in the Wholesale Customer Care Center (WCCC) in the reporting month plus unresolved PON Notifier Exceptions greater than ten (10) business days.

California PacBell Only:

Title: Timeliness of Billing Completion Notices - SBC/California Only

Area	*Requirement Description*
Description:	Measures the percent of completed orders that had a billing completion notice sent to the CLEC in 5 business days.
Method of Calculation:	Interim Method of Calculation: Sum (Number of Orders Completed in Billing Systems within 5Business Days) / (Number of Orders Completed) x 100 As of TBD Date: Sum (Number of Billing Completion Notices Sent to CLEC within X Business Days after Work Completion) / (Number of Orders Completed) x 100
Report Period:	Monthly
Report Structure:	Individual CLEC, CLECs in the aggregate, and by ILEC Affiliates
Reported By:	
Geographic Level:	Statewide

Measurable Standard:	**Benchmark:** • Standard - 96% in 5 business days
Exclusions:	• Weekends and ILEC published holidays. • Results for exiting CLECs. This may include, but is not limited to, service disconnects and adjustments of dollars billed in previous months. Exiting CLEC to be determined by CLEC notice to SBC/California, business to business communications, notice to SBC/California by the CPUC, FCC or by court decree. • Results for OS/DA billing other than those associated with end user services such as UNE-P and resale. • Any test transactions not submitted in connection with the pre-ordering, ordering, provisioning or maintenance of actual customers.
Business Rules:	.
Notes:	• Until the billing completion notice process has been developed and implemented phase II of this measure, SBC/California will report the percentage of orders completed in the billing systems within 3 business days.

Appendix D

Billing Performance (BI)

Function:
BI-1 Timeliness of Daily Usage Feed
Definition:
This metric measures the number of business days from the creation of message to the date that the usage information is made available to the the Daily Usage Feed (DUF). Measured in percentage of usage records within four (4) business days. One report covers both UNE and Resale. requesting this service, usage records will be provided to CLECs each day. The usage process starts with collection of usage information fro switch. Most offices have this information teleprocessed to the data ce offices poll usage every business day. Weekend and holiday usage is the next business day. Usage for all CLECs is collected at the same ti
Exclusions:
- Verizon Test Orders   - Long Duration Calls*   *Long Duration calls are defined as those calls that remain connected through two successive midnights. On all such calls, the call assembly process may output up to three record types indicating the beginning, continuation, or end of a long duration call. An annual study will be performed each December to determine the current volume of long duration calls.
Formula:
(Total usage records on DUF made available to CLEC in "y" business days divided by the total records on file) multiplied by 100 **Note:** y = 4
Performance Standard:
BI-1-02: 95% in Four (4) Business Days

Report Dimensions	
Company: - CLEC Aggregate - CLEC Specific	Geography: State Specific

Sub-Metrics		
BI-1-02	**% DUF in four (4) Business Days**	
Calculation	**Numerator**	**Denominator**
	Number of usage records on daily usage feed processed during month, where the difference between current date and call date is four (4) business days or less.	Number of Usage Records on DUF processed during month.