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ORIGINAL

Public Service Commission

July 13, 2005

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RECEIVED-FPSC

Ms. Mary Rose Sirianni
Manager, Regulatory
BellSouth Telecommunications, Inc.
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Re: Docket 000121A, Staff Implementation Request for Liberty SEEM Audit

Dear Ms. Sirianni:

Staff would like to express sincere appreciation for the efforts of all parties in making the BellSouth SEEM audit a beneficial experience. During the audit, a great deal of work was done in first identifying and then quantifying SEEM issues and strengths. Our recent workshop provided a forum for CLECs to join in the discussion, and staff has since received their written comments.

Throughout the audit, staff carefully considered each of Liberty's findings, BellSouth's specific response and, more recently, the workshop discussion and CLEC written comments. Each of these contributions is important and has been taken into consideration in staff's final conclusion regarding implementation.

Staff requests that BellSouth implement the actions detailed below for each finding. Staff considers these implementation steps prudent and necessary in order to enhance compliance with, and the effectiveness of, the BellSouth Performance Assessment Plan.

CMP _____
COM _____ Findings 1 and 31 are proposed as SQM review items to be discussed as soon as possible but
CTR _____ not later than the next 6-month review.
ECR _____ For Findings 2, 5, 6, 17, 22, 24, 26, 39, 41, and 46, staff believes that, upon implementation,
GCL _____ the revised SQM, currently being protested, will correct discrepancies. No further action is required
OPC _____ until the protest is resolved.
MMS _____ For Findings 3, 4, 7, 10, 18, 20, 21, 23, 25, 27, 28, 30, 32, 33, 34, 35, 37, 40, 42, 43, 45, 48,
RCA _____ 51, 52, 57, 58 and 59, BellSouth should file an affidavit in the docket asserting that the issues
SCR _____ identified in the Liberty report have been corrected and that BellSouth has tested to ensure that
SEC _____ the corrective action has resolved the issue. The affidavit(s) should describe the corrective
OTH _____ action, and provide any evidence which supports BellSouth's assertion that the issues have been
corrected. Evidence may include, but is not limited to, post-implementation data analysis.

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written procedures, specifications, and documentation. BellSouth should also specify whether any reposting or SEEM recalculations were necessary and quantify those results. Affidavits may be filed individually as soon as BellSouth has evidence to support its position.

For Findings 8, 12, 13, 14, 38, and 50, staff will initiate a task force to seek ways to improve BellSouth PMAP change management, change notification, and reposting practices and procedures. BellSouth representatives will participate.

For Findings 9 and 15, BellSouth should produce a comprehensive, accurate, revised PMQAP and a Supporting Data Users Manual (SDUM) within thirty (30) days of implementation of a revised SQM/SEEM plan. For Findings 11 and 56, BellSouth should produce a comprehensive, accurate, Florida SEEM technical documentation and a SEEM Replication Manual within thirty (30) days of implementation of a revised SQM/SEEM plan.

For Finding 16, 29, 36, 44, 47, and 49, BellSouth should conduct a detailed study analyzing the issue(s) identified in the Liberty finding. Study results, a recommendation for corrective action(s), and an action plan timetable should be submitted to the Commission staff within sixty (60) days.

For Findings 53, 54 and 55, the discrepancies found are such that a re-audit is considered necessary for a more complete resolution. BellSouth should engage a third-party auditor, either Liberty or another firm, to reexamine the issues identified in the findings, recalculate each measure, appropriately adjust Tier 1 and Tier 2 remedies previously remitted, and substantiate that RQ's proposed or already in place have corrected the underlying problems. Initiate this re-audit within sixty (60) days of the date of this letter. Discuss the scope and term of this re-audit with Commission staff.

For Finding 19, no further action is required.

Should you have questions, please contact me.

Sincerely,



Lisa S. Harvey
Chief, Bureau of Regulatory Review

Attachment

cc: Beth Salak, FPSC
Dale Mailhot, FPSC
David Rich, FPSC
Jerry Hallenstein, FPSC
Adam Teitzman, FPSC
Kira Scott, FPSC
Docket File 000121A

Liberty SEEM Audit

Staff Implementation Recommendation

Stan Implementation Recommendation					PSC Staff Recommendations	
Finding	Severity	Metric	Liberty Finding			
1	4	B-10	BellSouth was not reporting B-10 (Percent Billing Errors Corrected in "X" Business Days) according to the SQM Plan Reporting Requirements.		SQM review items to be discussed ASAP but NOT the next 6-mo review	
2	3	C-1	BellSouth is not reporting C-1 (Collocation Average Response Time) results according to the SQM Plan reporting requirements.		Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.	
3	3	C-M-8	For metric C-M-8 (Percent Change Requests Rejected), BellSouth was not reporting according to the SQM Plan reporting requirements.		Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.	
4	4	P-2R, M&R-3, B-7, & B-2B ⁸	BellSouth did not report the Z-scores according to the SQM Plan reporting requirements in the 12 month PMAP reports for measure P-2R, M&R-3, B-7, & B-2B (Percentage of Orders Given Jeopardy Notices), M&R-3 (Maintenance Average Duration), B-7 (Recurring Charge Completeness), and B-8 (Non-Recurring Charge Completeness).		Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.	
5	4	All	Florida SQM Plan & SEEM Admin Plan contain several discrepancies regarding provisions in Ft. Order PSC-02-1736-PAA-TP.		Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.	
6	4	OSS-2	For measure OSS-2 (OSS Availability -- Pre-Ordering/Ordering), the availability report at BellSouth's Interconnection website is missing entries for many of the OSS listed in Appendix D of the SQM.		Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.	
7	4	All	BellSouth posts only the most recent month of PARIS reports for viewing by the CLECs on the PMAP website. Historical PARIS reports are not available. This is in contrast to BellSouth's practice of having previous months' reports available for a full year for the majority of SQM reports.		Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.	
8	3	All	BellSouth has provided no evidence that it complied with the Florida Reposting Policy in determining whether errors or changes required reposting.		Staff will initiate a task force to seek ways in which to further improve BST's PMAP change management, change notification and reposting practices and procedures. BellSouth representatives will participate.	
9	3	All	The Supporting Data User Manual (SDUM) instructions for replicating the PMAP reports were not easy to understand and use. The majority of the SDUM document contains SQL scripts for replication but with no accompanying explanation as to how to use them. As the instructions are currently written, a user would need to be skilled in the use of SQL to be successful.		Staff believes an update is required for SDUM documentation regarding SQL scripts. BST should provide the Commission with a revised SDUM within thirty (30) days of implementation of the revised SQM/SEEM.	

Liberty SEEM Audit

Staff Implementation Recommendation

Finding	Severity	Metric	Liberty Finding	PSC Staff Recommendations
10	4	M&R-2	The SQL scripts contained in the SDIUM document for M&R-2 (Customer Trouble Report Rate) did not replicate CLEC results properly.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
11	3	All	BellSouth did not provide adequate documentation for replication of the results reported in PARIS.	BST should produce comprehensive, accurate Florida SEEM technical documentation and a Florida SEEM Manual within thirty (30) days of implementation of the revised SQM / SEEM plan.
12	3	All	The Impact Statements provided by BellSouth as part of the CLEC Notification Process were unclear and did not accurately state the impact of a proposed change on its associated performance metric.	Staff will initiate a task force to seek ways in which to further improve BST's PMAP change management, change notification and reposting practices and procedures. BellSouth representatives will participate.
13	3	All	The overall interval to process BellSouth's Change Requests was excessive.	Staff will initiate a task force to seek ways in which to further improve BST's PMAP change management, change notification and reposting practices and procedures. BellSouth representatives will participate.
14	3	All	BellSouth's tracking and monitoring of the metric change control process did not accurately track progress or permit BellSouth management to accurately workflows to determine which process areas are in need of improvement.	Staff will initiate a task force to seek ways in which to further improve BST's PMAP change management, change notification and reposting practices and procedures. BellSouth representatives will participate.
15	4	All	BellSouth has not documented well its Performance Measurements Quality Assurance Plan.	BST should produce comprehensive, revised PMQAP within thirty (30) days of implementation of the revised SQM / SEEM plan.
16	2	All	BellSouth excluded transactions from the calculation of reported results and remedy payments for a measure because it lacked required information about these transactions that were necessary only for another measure.	BST should conduct an analytical study of the number and causes for excluded transactions, by submeasure. The analysis should include the number of transactions included and excluded for both CLEC and BST, the results of excluding these transactions, and the results if these transactions would have been included. BST should submit an action plan for reducing the number of orders which are excluded from measurement due to errors. This analysis and action plan should be provided in sixty (60) days.
17	4	P-3, P-4, P-9, M&R-1, M&R-2, M&R-3, M&R-4, M&R-5	The retail performance analog for the Local Interconnection Trunk product as documented in BellSouth's SQM Plan for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval), P-4 (Average Completion Interval), P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion), M&R-1 (Missed Repair Appointments), M&R-2 (Customer Trouble Report Rate), M&R-3 (Maintenance Average Duration), M&R-4 (Percent Repeat Trouble Reports within 30 Days) and M&R-5 (out of Service >24 hours) measurements is unclear and misleading.	Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.
18	2	O-9 and P-9	BellSouth incorrectly reported certain INP orders as INP Standalone orders in the O-9 (FOC Timeliness - non-mechanized) and P-9 (Percent Provisioning Troubles within 30 Days) results.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
19	4	O-9	BellSouth adopted a convention for treating related purchase order numbers (RPONs) in O-9 (Firm Order Confirmation Timeliness) that is not contained in the SQM Plan.	No further action is required

Liberty SEEM Audit

Staff Implementation Recommendation

Finding	Severity	Metric	Liberty Finding	PSC Staff Recommendations
20	2	O-3 and O-4	BellSouth omitted coin orders from the reported results for O-3 and O-4 (Percent Flow-Through Service Requests).	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
21	2	P-7C	For the time period of this audit BellSouth was inappropriately excluding non-coordinated hot cuts from the calculation of the metric results for P-7C (Hot Cut Conversions -- Percent Provisioning Troubles received within 7 Days of a Completed Service Order).	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
22	2	P-7	BellSouth did not include the translation time necessary to place the line back in full service when calculating the metric results for P-7 (Coordinated Customer Conversion Interval).	Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.
23	2	P-3	BellSouth was misclassifying certain orders with a "PR-17" (cancelled order) error code thereby incorrectly excluding these orders from the calculation of the P-3 (Percent Missed Initial Installation Appointments) results.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
24	2	P-3	BellSouth reported the results for P-3 (Percent Missed Initial Installation Appointments) incorrectly because it included end-user-caused misses in the denominator.	Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.
25	2	P-7 and P-7C	BellSouth incorrectly excluded the majority of the hot cut orders from the calculation of the P-7 (Coordinated Customer Conversion Interval) and the P-7C (Percent Hot Cut Troubles Received Within 7 Days) measurements.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
26	2	P-4	BellSouth did not include disconnect service orders associated with Standalone LNP activity in the metric calculation for P-4 (Average Completion Interval & Order Completion Interval Distribution).	Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.
27	2	P-3, P-4, and P-9	BellSouth incorrectly included certain record change orders in the calculation of P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval), and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measurement results.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.

Liberty SEEM Audit

Staff Implementation Recommendation

Liberty Finding			PSC Staff Recommendations	
Finding	Severity	Metric		
2.8	2	P-7 and P-7C	BellSouth incorrectly excluded orders from the calculation of the P-7 (Coordinated Customer Conversion Interval) and the P-7C (Hot Cut Conversions - Percent Provisioning Troubles Received within 7 Days of a Completed Service Order) measurements that were properly included in the other in-scope provisioning metrics.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
2.9	2	P-7	BellSouth included orders with invalid conversion durations in the calculation of the P-7 (Coordinated Customer Conversion Interval) measurement.	BST should conduct an analytical study of the extent and cause(s) of zero durations. Study results, a recommendation for corrective action(s), and an action plan timetable should be provided to the Commission within sixty (60) days.
3.0	2	P-3	For P-3 (Percent Missed Initial Installation Appointments), BellSouth included certain cancelled orders in both the numerator and denominator of the SQM results calculation, but included the same orders only in the denominator of the SEEM results.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
3.1	1	P-3, P-4, and P-9	BellSouth incorrectly included deny and restore record change orders in the calculation of P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval), and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measurement results.	SQM review items to be discussed ASAP but NLT the next 6-mo review
3.2	2	P-7C	BellSouth overstated the CLEC circuit counts for P-7C (Hot Cut Conversions - Percent Provisioning Troubles Received within 7 Days of a Completed Service Order) by doubling the SLI (Non-Design) Loop volume.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
3.3	2	P-3, P-4, and P-9	During its calculation of the monthly SEEM results in PARIS, BellSouth incorrectly excluded transactions from the retail analog of the resale ISDN product for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
3.4	3	P-3, P-4, and P-9	The logic used by BellSouth to determine dispatch type misclassified some UNE loop orders when calculating the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
3.5	2	P-9	BellSouth did not include certain wholesale products in its calculation of the SEEM remedy payments for the P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.

Liberty SEEM Audit

Staff Implementation Recommendation

Finding	Severity	Metric	Liberty Finding	PSC Staff Recommendations
36	4	P-3, P-4, and P-9	The SQM and SEEM levels of disaggregation as documented in BellSouth's SQM Plan were inaccurate and misleading for the UNE Loop and Port product (UNE-P) for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.	BST should conduct a study determining why UNE-P dispatch orders are not included in SEEM. The study results, a recommendation for corrective action(s), and an action plan timetable should be provided to the Commission within sixty (60) days.
37	2	P-3, P-4, and P-9	BellSouth incorrectly classified UNE Line Splitting orders as UNE Loop and Port Combination (UNE-P) orders when calculating its results for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
38	2	P-7C	BellSouth neglected to calculate the total impact of multiple errors in determining whether it needed to repost the results for the P-7C (Hot Cut Conversions – Percent Provisioning Troubles Received within 7 Days of a Completed Service Order) measure.	Staff will initiate a task force to seek ways in which to further improve BST's PMAP change management, change notification and reposting practices and procedures. BellSouth representatives will participate.
39	4	P-7C	BellSouth's documentation in the SQM Plan for the P-7C (Hot Cut Conversions – Percent Provisioning Troubles Received within 7 Days of a Completed Service Order) is contradictory and misleading.	Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.
40	2	P-3, P-4, and P-9	BellSouth was not including all orders for Local Interconnection Trunks in its calculation of the SEEM remedy payments for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Order Completion Interval) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
41	2	P-4	BellSouth was not in conformance with the SQM Plan when calculating service order durations for the P-4 (Average Completion Interval & Order Completion Interval Distribution) measure.	Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.
42	2	M&R-2	BellSouth did not properly align the product IDs for troubles and the lines on which they occurred for M&R-2 (Customer Trouble Report Rate), causing mismatches and resulting in assignment of either the troubles or the lines to the wrong sub-metric in SQM reports and SEEM remedy payment calculations.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
43	2	M&R	BellSouth included special access services in some of its retail analog calculations during the audit period and, after correcting the calculations, failed to perform a complete analysis to determine whether reposting was necessary.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.

Liberty SEEM Audit

Staff Implementation Recommendation

Finding	Severity	Metric	Liberty Finding	PSC Staff Recommendations
44	2	M&R-3	BellSouth included orders with invalid maintenance durations in the calculation of the M&R-3 (Maintenance Average Duration) measure.	BST should conduct an analytical study explaining the extent and cause(s) for invalid maintenance durations being included in the calculation of the M&R-3 (MAD) measure. The study results, a recommendation for corrective action(s), and an action plan timetable should be provided to the Commission within sixty (60) days.
45	2	M&R-1, M&R-2, M&R-3, M&R-4, and M&R-5	During its calculation of the monthly SEEM results in PARIS, BellSouth incorrectly excluded ISDN-Basic Rate Interface (ISDN-BRI) Business Design troubles for the M&R-1 (Missed Repair Appointments), M&R-2 (Customer Trouble Report Rate), M&R-3 (Maintenance Average Duration), M&R-4 (Percent Repeat Troubles within 30 Days), and M&R-5 (Out of Service > 24 Hours) measures.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
46	2	B-1	For the B-1 measure (Invoice Accuracy), BellSouth did not define the adjustments it includes in a report month consistently for all bills.	Staff believes that, upon implementation, the revised SQM currently being protested will correct discrepancies. No further action is required until the protest is resolved.
47	3	B-1	BellSouth's manual process for preparing billing data for the B-1 measure (Invoice Accuracy) did not contain adequate quality control procedures.	BST should conduct a study of the manual process to ensure adequate quality control procedures. Study results, a recommendation for corrective action(s), and an action plan timetable should be provided to the Commission within sixty (60) days.
48	3	B-1	BellSouth's process for determining the final adjustment values and the count of adjustments in the calculation of the B-1 measure (Invoice Accuracy) for both CLECs and BellSouth retail is incomplete and thus does not assure accurate reporting of this measure.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
49	4	B-1	BellSouth's methods for defining revenues and determining which bills are included in the B-1 measure (Invoice Accuracy) are not addressed by the SQM Plan.	BST should file a study defining which revenues are currently excluded and the rationale for each exclusion. The study results, a recommendation for corrective action(s), and an action plan timetable should be provided to the Commission within sixty (60) days.
50	3	All	The BellSouth PMAP production validation process did not update the historical data used in trending analysis to reflect the effect of PMAP system changes.	Staff will initiate a task force to seek ways in which to further improve BST's PMAP change management, change notification and reposting practices and procedures. BellSouth representatives will participate.
51	4	All	BellSouth did not perform any validation to detect invalid zero dollar remedy payments during the audit period.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
52		All	BellSouth was not calculating the parity measures involving Tier 1 averages according to the SEEM plan.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.

Liberty SEEM Audit Staff Implementation Recommendation

Finding	Severity	Metric	Liberty Finding	PSC Staff Recommendations
53	1	O-3 and O-4	BellSouth did not make remedy payments for failures associated with the O-3 and O-4 (Percent Flow-Through Service Requests) measures in accordance with the SEEM plan.	The discrepancies found are such that a re-audit is considered necessary for a more complete resolution. BST should engage a third party auditor, Liberty or another firm, to reexamine the issues identified in the finding, recalculate the measure, appropriately adjust Tier 1 and Tier 2 remedies previously remitted, and substantiate that RQs proposed or already in place have corrected the underlying problems. Initiate this re-audit within sixty (60) days of the date of this letter. Discuss the scope and term of this re-audit with Commission staff.
54	1	M&R-1, M&R-4, M&R-5, P-3, and P-9	BellSouth did not calculate the remedy payments for percentage parity measures (i.e., M&R-1, M&R-4, M&R-5, P-3, and P-9) according to the SEEM Administrative Plan.	The discrepancies found are such that a re-audit is considered necessary for a more complete resolution. BST should engage a third party auditor, Liberty or another firm, to reexamine the issues identified in the finding, recalculate the measure, appropriately adjust Tier 1 and Tier 2 remedies previously remitted, and substantiate that RQs proposed or already in place have corrected the underlying problems. Initiate this re-audit within sixty (60) days of the date of this letter. Discuss the scope and term of this re-audit with Commission staff.
55	1	M&R-2	BellSouth did not calculate remedy payments for M&R-2 (Customer Trouble Report Rate) according to the SEEM Administrative Plan.	The discrepancies found are such that a re-audit is considered necessary for a more complete resolution. BST should engage a third party auditor, Liberty or another firm, to reexamine the issues identified in the finding, recalculate the measure, appropriately adjust Tier 1 and Tier 2 remedies previously remitted, and substantiate that RQs proposed or already in place have corrected the underlying problems. Initiate this re-audit within sixty (60) days of the date of this letter. Discuss the scope and term of this re-audit with Commission staff.
56	2	All	BellSouth did not have adequate and consistent documentation for its SEEM remedy payment calculation process, which may have contributed to erroneous calculations.	BST should produce comprehensive, accurate Florida SEEM technical documentation and a Florida SEEM Manual within thirty (30) days of implementation of the revised SQM / SEEM plan.
57	1	O-9	BellSouth improperly excluded some data items and improperly included others in the calculation of SEEM remedy payments for the O-9 (Firm Order Confirmation Timeliness) measure.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
58	3	All	The BellSouth CLEC Administration table update process caused delayed penalty payments to CLECs.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results.
59	3	All	BellSouth lacked a process to ensure that it made all remedy payments for a specific reporting month.	Upon completion of a detailed internal review, BST should file an affidavit asserting that issues have been corrected & BST has tested to ensure corrective actions resolved the issue. Affidavit should describe corrective action & provide evidence which supports the assertion of correction. Evidence may include but is not limited to post-implementation data analysis, written procedures, specifications, & documentation. BST should specify whether any reposting or SEEM recalculation was necessary & quantify the results. Affirm that there is currently in place a written procedure and administrative processes which guarantee all remedies for a given month are eventually paid.