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Nancy H. Sims
Director - Regulatory Relations

RECORDS AND REPORTING

November 1, 1999

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

Re: Docket No. 960786-TP Consideration of BST's Entry into InterLATA Services Pursuant to Section 271 of the Federal Telecommunications Act of 96

Dear Ms. Bayo:

For the record, the attached was delivered electronically and by hardcover to Lisa Harvey on October 29th.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,

Nancy H. Sims
Nancy H. Sims

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cc: Marshall M. Criser, III
Kip Edenfield
Michael Goggin

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FPSC-RECORDS/REPORTING

BellSouth Telecommunications, Inc. 850 222-1201
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Tallahassee, Florida 32301

Nancy H. Sims
Director - Regulatory Relations

October 29, 1999

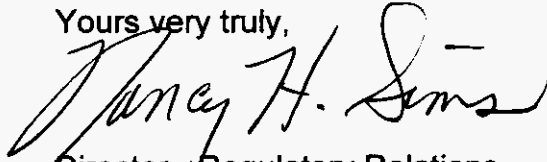
Mrs. Lisa S. Harvey
Bureau of Regulatory Review
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Dear Ms. Harvey:

Attached are BellSouth's prioritized comments on the draft Master Test Plan for third party testing of BellSouth's Operational Support Systems (OSS). The highest and high priority items are indicated with ** or * respectively, and not everything has been marked.

If you have any further questions, please do not hesitate to call.

Yours very truly,


Director - Regulatory Relations

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13369 NOV-1 1999

PROD-REG-REG/REG/REG/REG

BellSouth Comments on the Draft Florida Master Test Plan

** = highest priority; * = high priority

Section:

I. Doc. Control

A. Replace Tasha Ervin with Milton McElroy.

II. Introduction

A. Replace 'BST-FL' with 'BST' throughout the entire test plan

G. Overview section seems misplaced – should be IV., not the second VI (error) or VII.

III. Framework

A. Please add in the first sentence, 'and from the Georgia 3rd party test'

B. Under M&R Domain in the 2nd sentence after 'domain', please add 'evaluate functionality, and'.

IV. * Performance Metrics

D. Where it is determined that the criteria of this performance metrics test have been satisfied by audits in other states such as GA or LA, those tests need not be performed in this test.

1.1 Suggest replacing the second sentence with 'The procedures for the calculation of CLEC and Retail metrics will be included.'

1.6.1 Add the SQM document and appropriate Commission Orders (e.g. LA filing with attachments on SQM Audit Plan).

1.6.2 3. Add 'that produce the performance measurements reports'.

5.1 In the 1st sentence, insert 'CLEC and BST retail' before 'performance metrics' and delete 'and retail analogs' from the end of the sentence. In the 2nd sentence, delete 'and retail analogs'.

V. Processes & Procedures

6.1 typo in 2nd sentence: should say 'evaluates'.

9.1 last paragraph, end of 1st sentence: add 'and the same downstream provisioning and maintenance systems'.

10.0 Please combine this section with section 8.0 – our billing help desk is in the LCSC, who call on billing SMEs as needed.

15.6.1 Item #6 – 'coordinated meets'? There's a word or 2 missing.

16.1 last sentence – center names should be INSAC and NRC.

VI. Transaction Verification and Validation

A. 2nd sentence – 'compliance to measurement agreements' should be in the metrics section rather than this one. Also, please add 'OSS functionality' to the 2nd sentence indicating evaluation scope.

D. You have grouped all the POP interfaces (TAG, EDI, LENS99) under 'POP Functional Evaluation' and 'POP Volume Performance Tests', but split out the TAFI and ECTA Functional Evaluation and Performance Tests into separate sections, which seems to indicate that was done because of the functionality differences between TAFI and ECTA, which is true. Therefore, the functional comparison between ECTA and TAFI should be deleted in the ECTA sections.

1.1 1st paragraph – Again, measures should be in the metrics section.

* 2nd paragraph – add LENS99 to the interfaces to be tested.

Also add LENS99 to the table, indicating X's by GUI for both Pre-order and Order.

VI. 1.4 In second bullet 'Order Processing' – add after add/delete/change 'and other activity types listed in the following section'.

Delete 'Migrate "as is" with changes' bullet – it's the same as the following bullet 'Migrate "as specified".'

Top of p.75, in the bullet 'Orders that can be submitted either through the GUI' – add 'TAG' in front of 'GUI'.

Paragraph beginning 'In addition to normal orders,' correct center acronym which should be 'LCSC'.

** 2.1 1st paragraph – 1) add 'using the RSIMMS test bed' at the end of item 1), and item 3) stress testing should be at 250% of '99 volumes, not of 2001 volumes, which is an unnecessary level and adds unnecessary cost. You may want to add a production volume test as we're/you're doing in GA, run at current capacity levels.

* 3rd paragraph, 3rd sentence – the peak test should be 8 hours, as it is in the GA test, which is already much longer than the usual peak *hour* tests, not 24 hours as the normal volume test is.

2.6.3 10., 11. Should be deleted because the YE2001 volume test will be run in the RSIMMS test bed.

3.1 2nd line, add 'SOCS' after 'BST ordering system'.

3.6.2 item 5., add 'by the Test Manager' at the end of the sentence.

4.1 2nd paragraph – If orders are cancelled prior to provisioning, then they won't be provisioned. So, you may want to delete 'and canceled'.

* 5.4 TAFI table: 'Initiate MLT test' – TAFI does that automatically.

Delete both SARTS testing rows – TAFI does not handle special services, and therefore has no SARTS testing.

Change the last row from 'Caseworker' to 'retail TAFI'.

** 6.1 Delete 'and an analysis of its functionality in comparison to BellSouth's Retail Residence and Business Trouble Reporting'. That belongs in the TAFI section, not in the ECTA section. As previously indicated, ECTA was built to conform to the T1M1 national standard as is not used by retail.

TAFI is our retail parity M&R system, ECTA is our machine-to-machine standard M&R system, as required by the FCC. ECTA adheres to the standard and is not functionally equivalent to TAFI; if it had been, it would not have met the requirement to adhere to the standard.

**6.2 Delete 'and to evaluate the equivalence of the ECTA interface functionality to BellSouth trouble entry systems'.

**6.3 Delete 'Physical access to BellSouth Trouble entry site established'.

**6.4 Delete 'in comparison to BellSouth's retail Residence and Business Trouble Entry'.

Delete the last row in the table, 'Functional Equivalence to BST Residence and Business TAFI'.

**6.6 Delete Phase 2 bullet.

**6.6.1 Delete item #6.

**6.6.3 Delete items #1, 6 and 7.

**6.6.6 Delete item #4.

7.0 Since TAFI is in large volume production – 15 machines deployed throughout BellSouth which are handling far more than the CLEC YE2001 trouble level, there doesn't seem to be a need to do a TAFI volume or load test. Therefore, this section can be rewritten to indicate an observation of TAFI's total deployment and volume levels.

**8.4 Again for ECTA, delete the second sentence and the following chart discussing performance evaluation of retail TAFI.

Appendix A

Resale and UNE - Will those products have an indication of electronic or manual ordering? Not all of them are electronically orderable, for example.

UNE – DS1 loop + LNP is not ordered together; they must be ordered separately.

Stand-alone pre-order – add Calculate due date to the activities.

*UNE Combinations – per the FCC 319 remand, it is not clear the extent to which UNE combinations will be provided, so this whole chart is subject to question and change and the remand becomes public.

**** Appendix D – Metrics**

1 – Disaggregation – last line – delete ' and by resale and UNE' – this cannot be done by product.

Note 1 – Benchmarks are being developed where retail analogs do not exist.
- under Evaluation Criteria/Stnds., Note 1 should replace the last line '*BST development of retail analogues . . .*' throughout Appendix D.

2 – Evaluation Criteria – delete b. from 1st line. Add b. None. Shared with retail.

3 – Disaggregation – b. actual DOE flowthrough is 0. (DOE has no mechanized service order generation capability.)

- 7 – Disaggregation – of CLEC measures cannot be done.
 - Evaluation Criteria – delete existing text. Replace with ‘This is at parity with BST retail. BST retail residence and business answer times have been weighted and combined.’

- 13 – Evaluation Criteria – delete existing text. Replace with ‘At present, BST retail does not do coordinated customer conversions.’

- 16 – Disaggregation – please delete last line – CLEC TAFI measurement cannot be disaggregated into residence and business.
 - Evaluation Criteria – add ‘At parity with BST retail’. BST retail residence and business response times have been weighted and combined.

- 18, 19, 20, 21, 22 – Evaluation Criteria – delete second paragraph – BST *can* measure CLEC UNE loop repair reporting. BST can report UNE loops, but has no involvement in number portability.

- 23 – Disaggregation – of BST invoice accuracy to match CLEC measurements cannot be done.
- 23,24 – Evaluation Criteria – b. question: ‘parity with CLEC measurements’, is this FL vs. Region? Is this needed?

BellSouth recommends the existing performance measurements be sanctioned by the FL PSC. The performance measurements have had exhaustive and thorough development as directed by the FCC and other PSCs.

Appendix E – Reference Documents

Add the Georgia Master Test Plan and its results report.