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November 23, 1999

ORIGINAL

OF COUNSEL  
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RECORDS AND REPORTING

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

Re: BellSouth OSS Performance Metrics Docket No.'s  
960786-TL and 981834-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Rhythms Links Inc. are the original and fifteen copies of its Comments on Interim Performance Metrics.

By copy of this letter, this document has been provided to the parties on the attached service list.

Very truly yours,

*Richard D. Melson*

Richard D. Melson

<sup>4</sup>  
RDM/kcg  
Enclosures  
cc: Parties of Record

- AFA
- APP
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14458 NOV 23 99

FPSC-RECORDS/REPORTING

*Done 11/24/99*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

ORIGINAL

Petition of Competitive Carriers )  
for Commission Action to Support )  
Local Competition in BellSouth )  
Telecommunications, Inc.'s )  
Service Territory )

Docket No. 981834-TP

Filed: November 23, 1999

COMMENTS OF RHYTHMS LINKS INC.  
ON INTERIM PERFORMANCE METRICS

Rhythms Links Inc. (Rhythms) hereby files its comments on the interim performance metrics to be used during third party testing of BellSouth's operations support systems. Rhythms urges the Commission to establish interim performance metrics that will adequately measure whether pre-ordering, ordering and provisioning of xDSL-capable loops can be conducted with the same timeliness, efficiency and accuracy as BellSouth enjoys for its own data service offerings.

INTRODUCTION

Rhythms offers high-speed data transmission services to customers by utilizing Digital Subscriber Line ("DSL") technologies. DSL technologies enable a carrier, such as Rhythms, to use existing phone lines to deliver high-speed data and Internet access services. Because xDSL relies on existing

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phone lines, xDSL-based services can be delivered to virtually all customers' homes and businesses more quickly and at less cost than other data services. Rhythms' services can be used for telecommuting, dedicated access to the Internet, and access to Intranet-type networking solutions. Rhythms' provision of xDSL services competes directly with BellSouth's loop-based advanced services.

Rhythms' most prominent competitive advantage over the BellSouth advanced service offerings is Rhythms' ability to provision a variety of xDSL-based services according to the specific needs of each customer. These different types of xDSL include Asymmetric Digital Subscriber Line ("ADSL"), Rate adaptive Asymmetric Digital Subscriber Line ("RADSL"), High bit rate Digital Subscriber Line ("HDSL"), Symmetric Digital Subscriber Line ("SDSL") and ISDN Digital Subscriber Line ("IDSL"). A description of the various types of xDSL services was provided in Exhibit I to Rhythms' Comments on KPMG's Master Test Plan filed in these dockets on October 29, 1999. The various types of xDSL allow Rhythms to provide service to customers at locations further from the central office and at speeds faster than other data services.

In order to provide those services, Rhythms depends on BellSouth for three primary components. First, Rhythms must collocate and maintain equipment at BellSouth premises, including BellSouth central offices. Second, Rhythms must lease "clean" copper loops, unfettered by any intervening devices, such as load

coils. Third, Rhythms requires the timely provisioning of unbundled transport facilities from BellSouth. Rhythms must obtain these components in a timely and cost-effective manner to meet customer needs. The interim performance metrics to be used during the third party testing of BellSouth's OSS must be capable of measuring BellSouth's performance with respect to each of these key components.

#### **INTERIM PERFORMANCE METRICS**

In accordance with the staff's request, Rhythms will use the September 15, 1999 version of BellSouth's Service Quality Measures (SQMs) as the baseline for suggesting the modifications and additions necessary to evaluate BellSouth's performance on the key parameters that are necessary to support Rhythms' business plan. Rhythms submits these comments with the understanding that they address interim metrics to be used only during the third party OSS testing. Therefore, Rhythms' proposals do not necessarily represent the performance metrics that would be appropriate on a permanent basis. In addition, these comments are preliminary and are subject to further additions or refinements as the workshop process progresses.

#### **I. COLLOCATION**

BellSouth's current SQMs for collocation are set forth at pages 61 to 63 of its September 15, 1999 performance metrics document. Rhythms recommends the following modifications to these SQMs. These changes are mostly self-explanatory. They reflect guidelines for collocation which have either been adopted

by the Commission in Docket No. 990321-TP or guidelines that are under consideration in that docket.

**A. Collocation/Average Response Time**

1. **Definition:** The definition of this measure should be revised to read as follows:

Measures the average time (counted in calendar business days) from the receipt of a complete and accurate application (including receipt of application fees) to the date BellSouth responds in writing, with sufficient information for the CLEC to place a Bona Fide firm order.

2. **Business Rules:** The business rules for this measure should be revised to read as follows:

The clock starts on the date that BST receives a complete and accurate collocation application accompanied by the appropriate application fee. The clock stops on the date that BST returns a complete response containing sufficient information for the CLEC to place a Bona Fide firm order. The clock will restart upon receipt of changes to the original application request.

3. **Level of Disaggregation:** Physical collocation should be further disaggregated into "caged" and "cageless" physical collocation.

4. **Retail Analog/Benchmark:** The benchmark for purposes of interim testing should be 15 calendar days.

**B. Collocation/Average Arrangement Time**

1. **Definition:** The phrase "business days" should be changed to "calendar days."

2. **Exclusions:** Delete the exclusion for "Time for BST to obtain permits." Add an exclusion for "Extensions of Time Agreed to by CLEC or Approved by FPSC."

3. **Business Rules:** Delete the second sentence referring to permit requests.

4. **Level of Disaggregation:** Physical collocation should be further disaggregated into "caged" and "cageless" physical collocation.

5. **Retail Analog/Benchmark:** The benchmark for purposes of interim testing should be 90 calendar days for caged physical collocation and 60 calendar days for virtual collocation and cageless physical collocation.

**C. Collocation/Percent of Due Dates Missed**

1. **Exclusions:** Delete the exclusion for "Time for BST to obtain permits." Add an exclusion for "Extensions of Time Agreed to by CLEC or Approved by FPSC."

2. **Level of Disaggregation:** Physical collocation should be further disaggregated into "caged" and "cageless" physical collocation.

3. **Retail Analog/Benchmark:** The benchmark for purposes of interim testing should be no due dates missed absent an extension agreed to by the CLEC or approved by the FPSC.

## II. UNBUNDLED xDSL-CAPABLE LOOPS -- PRE-ORDERING

It is critical for Rhythms to obtain accurate and timely loop-make up information at the pre-ordering stage to enable it to determine what type of DSL service can be offered to a particular customer. Loop make-up information should identify the equipment and technical characteristics associated with the loop. That information should include the following: (i) the loop length with bridged taps, (ii) the loop length without bridged taps, (iii) the length and location of bridged taps, (iv) the loop wire gauge and gauge changes, (v) the presence and location of load coils, (vi) the presence and location of repeaters, (vii) the presence and type of fiber digital loop carrier (DLC) systems and digital access main lines (DAMLs), and (viii) the alternative loops serving or capable of serving the particular end-user location.

The current pre-ordering metrics at pages 2 to 4 of BellSouth's SQM document address response time and OSS interface availability only for electronic pre-ordering systems and for the information available through those systems. BellSouth, however, currently provides loop make-up information to CLECs only through a manual process. While manual processes do not meet the needs of the CLEC community, it is still necessary to devise interim metrics to evaluate the performance of such manual systems when they are the only ones available. Rhythms therefore suggests that the following additional performance measure be established for interim testing purposes.

**PRE-ORDERING - LOOP MAKE-UP INFORMATION**

<b>Report/Measurement:</b>
Loop Make-up Information Timeliness
<b>Definition:</b>
Timeliness of Loop Make-up information is the average response time and response intervals from receipt of a request for such information until return of data to the CLEC.
<b>Exclusions:</b>
None.
<b>Business Rules:</b>
The elapsed time from receipt of a loop make-up information request (fax receive date and time stamp or e-mail receive date and time stamp) until loop-make up data is returned to the CLEC. Intervals are measured in hours and tenths of hours rounded to the nearest tenth.
<b>Calculation:</b>
Loop Make-up data Timeliness = $\sum[(\text{Date and Time of Return of Loop Make-up Information}) - (\text{Date and Time of Loop Make-Up Information Request Receipt})] / (\text{Number of Information Requests Returned in Reporting Period})$
<b>Report Structure:</b>
<ul style="list-style-type: none"><li>• CLEC Specific</li><li>• CLEC Aggregate</li></ul>
<b>Level of Disaggregation:</b>
<ul style="list-style-type: none"><li>• Average Interval in Hours</li><li>• Response Intervals<ul style="list-style-type: none"><li>• 0-4 hours</li><li>• 4-8 hours</li><li>• 8-12 hours</li><li>• 12-16 hours</li><li>• 16-20 hours</li><li>• 20-24 hours</li><li>• 24-48 hours</li><li>• &gt; 48 hours</li></ul></li></ul>
<b>Retail Analog/Benchmark:</b>
To be developed. <sup>1</sup>

<sup>1</sup>Rhythms understands that BellSouth uses an automated system, at least in part, to make loop qualification determinations for its own data service offerings. Such determinations require access to the same type of underlying loop make-up information that Rhythms requires to make its xDSL-capability determinations. Rhythms has not been able to learn the details of how BellSouth accesses loop make-up information. As part of its comments on the Master Test Plan, Rhythms urged that the Phase II test manager obtain an understanding of the BellSouth systems in order to be able to form a conclusion as to whether CLECs are provided access to loop-make up information at parity with what BellSouth itself enjoys.



### III. ORDERING AND PROVISIONING

#### A. Disaggregation

The current metrics in BellSouth's SQM document generally do not include the degree of product disaggregation that is required to determine the timeliness and efficiency with which BellSouth supports the ordering and provisioning of xDSL-capable loops. The need for appropriate disaggregation is even more important now that the FCC has ruled that both "conditioned loops" (i.e. loops with all their capabilities intact) and "line-sharing" (i.e. the unbundling of the high frequency portion of the loop used by the incumbent LEC to provide voice-grade service to a customer), are unbundled network elements.

Rhythms therefore recommends that (a) xDSL-capable loops, (b) conditioning of loops (i.e. removal of electronic devices and, where necessary, bridged tap) and (c) xDSL over voice should be disaggregated from other UNES for measurement and reporting purposes throughout the ordering and provisioning measures included in BellSouth's current SQMs.

#### B. Retail Analogs and Benchmarks

OSS functions provided to CLECs must be compared to BellSouth's retail analogs if such analogs exist. If analogs do not exist, BellSouth's performance must be measured by a performance standard or benchmark designed to ensure that CLECs are given a meaningful opportunity to compete. Because detailed knowledge of BellSouth's OSS is generally required in order to determine the existence of retail analogs, it is difficult for

Rhythms to propose such analogs. The further workshops to be held in this docket nevertheless should attempt to establish either retail analogs or performance benchmarks for ordering and provisioning of xDSL capable loops.

#### CONCLUSION

While BellSouth's SQMs provide a starting point for determining the performance of BellSouth's OSS, several additions or refinements are required in order to ensure that the unique needs of DSL-providers such as Rhythms are being met. To this end, Rhythms has suggested:

- (1) modifications to the SQMs related to collocation;
- (2) addition of a performance measurement for the timeliness with which loop make-up information is provided;
- (3) the calculation and reporting of ordering and provisioning measurements at a greater level of disaggregation, particularly with respect to xDSL capable loops; and
- (4) continued work on the development of appropriate retail analogs or benchmarks.


This list of changes and additions is not exhaustive, and does not include all the changes and additions that should be implemented for permanent performance measurements.

Nevertheless, the adoption of these suggestions would represent a significant step toward ensuring that the third party testing of BellSouth's OSS addresses issues that are of critical importance

to DSL competitors such as Rhythms.

RESPECTFULLY SUBMITTED this 23rd day of November, 1999.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

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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 23RD day of November, 1999.

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