



GTE SERVICE CORPORATION

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Kimberly Caswell Counsel

May 5, 2000

Ms. Blanca S. Bayo, Director **Division of Records & Reporting** Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 000121-TP Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies

Dear Ms. Bayo:

These are GTE Florida Incorporated's (GTE) Comments in response to the Commission Staff's Initial Proposal concerning establishment of a performance assessment plan for the incumbent local exchange carriers' operations support systems (OSS).

GTE supports the general concepts outlined in the Initial Proposal. In particular, GTE agrees that the most efficient way to address OSS performance metrics is through a collaborative process among the industry and Commission Staff, with due consideration of OSS-related work already done in other states. This voluntary approach will also help avoid legal issues about the Commission's authority to address OSS issues outside of an arbitration proceeding under the Telecommunications Act of 1996.

GTE is encouraged by Staff's responsiveness to parties' suggestions at the workshop and looks forward to participating in further refining the concepts outlined in the Initial Proposal.

Please contact me if you have any questions.

Sincerely, XIIIten ten R ----Kimberly Caswell C () LEC. KC:tas 1448 ∋⇔C $i \in \mathbb{R}$c: Parties of Record Brenda Maxwell, Bureau of Auditing and Financial Analysis Wave A part of GTE Corporation

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DOCUMENT NUMBER-DATE 0**5684** MAY-58 FPSC-RECORDS/REPORTING

