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June 28, 2002

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

Dear Mrs. Bayo:

RE: Investigation into the establishment of operations support systems permanent performance measures (Sprint Track)
Docket No. 000121B-TP

Investigation into the establishment of operations support systems permanent performance measures (Verizon Track)
Docket No. 000121C-TP

Enclosed please find the original and 15 copies of AT&T's Comments in the above-referenced proceeding.

Thank you and please contact me if there are any questions regarding this matter.

Sincerely,

Virginia C. Tate

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(PT)

Enclosures

DOCUMENT NUMBER-DATE

06748 JUN 28 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment) Docket No. 000121B-TP
of operations support systems permanent)
performance measures (Sprint Track))

In re: Investigation into the establishment) Docket No. 000121C-TP
of operations support systems permanent)
performance measures (Verizon Track))
_____)
)

AT&T'S COMMENTS

COMES NOW AT&T Communications of the Southern States, LLC; AT&T Broadband Phone of Florida, LLC; and TCG South Florida, Inc. (hereinafter "AT&T") and, pursuant to Rule 25-22.039, Florida Administrative Code, files these Comments as requested by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced dockets.

AT&T urges the Commission to implement the same review process that the Commission adopted for BellSouth's performance measures in Docket No. 000121-TP, In re: Investigation into the establishment of operations support systems permanent performance measures (BellSouth Track). In that docket, the parties stipulated to a six month review process that is outlined in staff's recommendation issued on August 2, 2001 (See Attachment A). Having successfully completed a BellSouth performance measurements proceeding with plan implementation completed on May 31, 2002, this Commission and its staff are knowledgeable with regard to the processes that work when

dealing with such detailed and granular performance measurements data and its importance with regard to local competition in Florida. AT&T recommends the same process that the Commission adopted for BellSouth for managing the Sprint and Verizon performance measurement proceedings. That process includes:

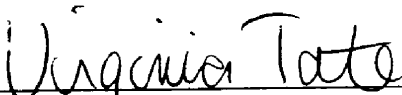
1. A collaborative work group, including ALECs, the Commission staff and Sprint and Verizon, respectively, should be established to review the Performance Assurance Plan for additions, deletions and modifications.

2. During the first two years of implementation, as BellSouth stipulated to in its performance measurements proceeding, a review cycle should start six months after the date of the Commission order. After two years from the date of the order, the review cycle may, at the discretion of the Commission, be reduced to an annual review.

3. Sprint, Verizon and the ALECs, in each respective proceeding, should file any proposed revisions to the Performance Assessment Plan one month prior to the beginning of each review period. Sprint and Verizon may be ordered by the Commission to modify or amend any aspect of the plan including measures and remedies. Nothing should preclude either party from participating in any proceeding or from advocating modifications. In the event a dispute arises regarding the ordered modifications, the parties will refer the dispute to the Commission.

The process for handling these very important proceedings is just as important as the results at the conclusion of each case. AT&T respectfully requests that the Commission consider incorporating the processes adopted for BellSouth in the Sprint and Verizon performance measurements proceedings.

Respectfully filed this 28th day of June, 2002.


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Attorney for AT&T
Communications of the
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Broadband Phone of Florida, LLC;
and TCG South Florida, Inc.

DOCKET NO. 000121-TP
DATE: August 2, 2001

ISSUE 7: What review process, if any, should be instituted to consider revisions to the Performance Assessment Plan that is adopted by this Commission?

RECOMMENDATION: Staff recommends the Commission approve the stipulated position of the parties.

STIPULATED POSITION OF THE PARTIES:

The parties concur in the proposed review process set forth in the FPSC Staff Proposal (Section 3.0, Modifications to Measures.) [Exhibit 13, p.2]

STAFF ANALYSIS: Staff recommends approval of the stipulated position, which was agreed to by BellSouth, AT&T, e.spire, FCTA, Worldcom, KMC, Covad, Mpower, Z-tel, Time Warner and IDS, and filed in this docket as document number 09141-01.

Section 3.0 of staff Witness Stallcup's proposal states:

3.0 Modifications to Measures

3.1 During the first two years of implementation, BellSouth will participate in six-month review cycles starting six months after the date of the Florida Public Service Commission order. A collaborative work group, which will include BellSouth, interested CLECs and the Florida Public Service Commission will review the Performance Assessment Plan for additions, deletions or other modifications. After two years from the date of the order, the review cycle may, at the discretion of the Florida Public Service Commission, be reduced to an annual review.

3.2 BellSouth and the CLECs shall file any proposed revisions to the Performance Assessment Plan on month prior to the beginning of each review period.

DOCKET NO. 000121-TP
DATE: August 2, 2001

- 3.3 From time to time, BellSouth may be ordered by the Florida Public Service Commission to modify or amend the Service Quality Measures or Enforcement Measures. Nothing will preclude any party from participating in any proceeding involving BellSouth's Service Quality Measures or Enforcement Measures or from advocating that those measures be modified.

- 3.4 In the event a dispute arises regarding the ordered modification or amendment to the Service Quality Measures or Enforcement Measures, the parties will refer the dispute to the Florida Public Service Commission.
{Exhibit 13, p.2}