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July 30, 2002

Mrs. Blanca S. Bayó  
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Florida Public Service Commission  
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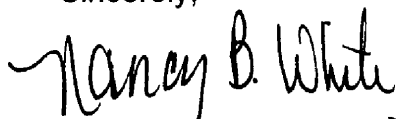
**Re: Docket No. 000121A-TP (OSS)**

Dear Ms. Bayó:

Pursuant Order No. PSC-02-0989-PAA-TP, enclosed are an original and fifteen copies of BellSouth's Proposed Service Quality Measure Flow Through Improvement Plan Issue No. 1, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
Nancy B. White (UA)

Enclosures

cc: All parties of record  
Marshall M. Criser, III  
R. Douglas Lackey

DOCUMENT NUMBER-DATE  
07979 JUL 30 08  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 000121A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 30th day of July, 2002 to the following:

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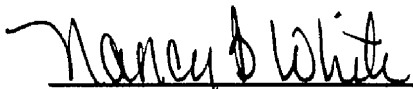
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Nancy B. White (KA)

**(+) Signed Protective  
Agreement**

#237366

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Investigation into the establishment ) Docket No. 000121A-TP  
Of Operations Support Systems Permanent )  
Performance Measures for Incumbent )  
Local Exchange Telecommunications Companies )  
\_\_\_\_\_ ) Filed: July 30, 2002

**BELLSOUTH'S PROPOSED SERVICE QUALITY MEASURE FLOW  
THROUGH IMPROVEMENT PLAN ISSUE NO. 1**

**OVERVIEW**

In its Performance Metrics Order, the Florida Public Service Commission ("Commission") ordered BellSouth to file a Flow Through improvement plan by July 30, 2002 on how it intends to achieve the Service Quality Measure Flow Through benchmarks and show significant improvement in 2002. The Commission opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of Operations Support Systems ("OSS") provided for Alternate Local Exchange Carriers' ("ALECs") use by Incumbent Local Exchange Carriers ("ILECs"). Associated with the performance metrics is a monitoring and enforcement program that is to ensure that ALECs receive nondiscriminatory access to the ILEC's OSS.

Pursuant to the stated goals of its docket, the Florida Commission ordered BellSouth to file a specific action plan by July 30, 2002 designed to improve the Flow Through Service Quality Measure in order to achieve the mandated benchmarks. In compliance with the Commission's directive, BellSouth hereby submits its Proposed Flow Through Improvement Plan.

As an initial matter, any improvement plan must be viewed in the proper context. BellSouth's current commercial data demonstrates that its OSS provides high flow through capability. Furthermore, the FCC considered BellSouth's commercial data in formulating its comments in the Georgia and Louisiana (GALA) Order. The FCC affirmed that "BellSouth's OSS are capable of flowing through UNE orders in a manner that affords competing carriers a meaningful opportunity to compete." It also found that

“BellSouth is capable of flowing through resale orders in substantially the same time and manner as it does for its own retail customer orders.” GALA Order, ¶ 143

BellSouth’s overall flow through results reflects the fact that BellSouth’s flow through performance remains strong. This is especially true for ALECs that submit large numbers of requests and yet maintain high flow through rates. The chart below shows the top 5 ALECs by electronic LSR volume. The data covers the entire region and reflects activity that took place during the first quarter of 2002. Note that for live ALECs, the flow through rates for 3 out of the 5 ranges from 90.19% to 94.64%.

<b>ALEC</b>	<b>Total Mech LSR</b>	<b>% Flow Through</b>
A	294,868	77.06%
B	161,971	90.19%
C	155,179	78.76%
D	107,118	93.53%
E	81,319	94.64%

Flow through rates for individual competing carriers can vary, and the FCC has also recognized “that BellSouth's ability to flow through orders at high rates is dependent, in part, on the ability of the competing carriers.” GALA Order, ¶ 145. An analysis of the March 2002 Percent Flow Through Service Requests (Aggregate Detail) report reveals that 246 users experienced a flow through rate in excess of 90%. Of significant note, 39 of these users electronically submitted in excess of 1,000 LSRs with 80 more users submitting between 100 and 999 LSRs. From these 119 users, 30 experienced achieved flow through rates of 90% or higher, and 34 experienced achieved flow through rates between 85.0% and 89.9%. The number of ALECs experiencing higher flow through rates demonstrates that BellSouth is providing ALECs with electronic interfaces capable of accepting flow through eligible requests.

That being said, BellSouth remains committed to improving flow through via the methods discussed below.

## BELLSOUTH'S REPORT ON PROPOSED FLOW THROUGH IMPROVEMENT PLAN

### A. Flow Through Task Force

In February 2001, BellSouth and the ALECs established the cooperative Flow Through Task Force (“FTTF”), which operates as a subcommittee of the CCP. The FTTF analyzes UNE and Resale LSRs to improve flow through and reduce fall out. The objective of the FTTF is to enhance the flow through of electronic orders, document those enhancements, and develop a schedule for implementing the enhancements. On April 9, 2002, the FTTF had its regular meeting. Following this meeting the FTTF distributed a ballot for the ALECs to prioritize the flow through change requests that had been submitted to the FTTF over the past year. There is a Flow Through Improvement List that identifies those flow-through improvement features, errors, and defects that have already been implemented or are targeted for the next release 10.6. A total of thirty-five items have been identified, thirty-one of which have been implemented. In addition, the ALECs have adopted portions of BellSouth’s change management improvement proposal (commonly known as the red line/green line). Flow through change requests initiated by the flow through task team are considered as Type 2 mandates, thus receiving the highest priority rating. These efforts will enhance BellSouth’s ability to meet the benchmarks established by the Florida Commission and also the expectations of the FCC where in its Order approving BellSouth’s Georgia and Louisiana application, the FCC “note [d] that the Georgia Commission established the FTTF to further improve BellSouth’s performance. ... We expect that BellSouth will continue to improve its flow through performance, work with ALECs in workshops, and make requested improvements through the change management process.” [Footnotes omitted.] GALA Order, ¶ 146. These efforts will enhance BellSouth’s ability to meet the benchmarks established by the Florida Commission.

### B. Additional Initiatives

BellSouth proposes to undertake an additional project to improve flow through rates for Residential Resale, Business Resale, UNE, and LNP segments to benchmarks established by this Commission. According to the Florida Interim Service Quality



Measurement Plan, Version 3.0 dated June 2, 2001 the benchmarks for the segments of Percent Flow Through Service Requests are:

<b>SQM Flow Through Segments</b>	<b>Benchmarks</b>
Residence Resale	95%
Business Resale	90%
Unbundled Network Elements (UNE)	85%
Local Number Portability (LNP)	85%

1. This project will focus solely on reducing or eliminating items classified as "BST errors" in the current flow through reporting process. BST errors are errors that require manual review by the LCSC due to BellSouth system functionality. In other words, the ALEC orders are accepted by the BellSouth OSS and then the orders fall out for BST manual intervention. This fall out is categorized into Error Buckets or Error Codes. BST will focus on these BST errors for this project.

2. This project will add information technology resources, over and above those currently designated for the ALEC OSS projects, and will not affect the capacity already identified for the 2002 and 2003 release schedule, as published and shared through the Change Control Process ("CCP").

3. BellSouth will follow the CCP Document and open Type 6 change requests as identified for improvement purposes. A description of the CCP Document is outlined in the Change Control Process Document located at:

[http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/docs/bccp/ccp\\_bccp\\_guide.pdf](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/ccp_bccp_guide.pdf)

These Type 6 change requests will be implemented during the system maintenance windows as point releases and will not be tied to the existing release schedule. These corrections will not be available for testing in CAVE, since they require no change on the part of the ALEC, and affect only orders currently being processed as BST errors.

4. The flow through improvement plan outlined will focus on the Local Exchange Service Order ("LESOG") application. BellSouth has performed an analysis of the top error codes impacting flow through and identified flow through errors that are

isolated to the LESOG application. Other systems may be impacted with future maintenance releases. Implementation is expected to begin on or about mid August. Included in the flow through improvement project plan below is the estimated time-line for each of the flow through segments, showing current performance, and expected improvements once this plan is implemented.

### FLOW THROUGH IMPROVEMENT PROJECTION

<b>Category</b>	<b>Residence Resale</b>		<b>Business Resale</b>		<b>UNE</b>		<b>LNP</b>	
<b>Benchmark</b>	<b>95%</b>		<b>90%</b>		<b>85%</b>		<b>85%</b>	
Actual/ Projected Performance	Actual	Project ed	Actual	Projected	Actual	Projected	Actual	Projected
Apr 02	87.32		71.85		84.54		92.60	
May 02	86.74		69.54		82.68		89.80	
Jun 02	88.58	88.58	73.74	73.74	83.84	83.84	83.63	83.63
Jul 02	XX	88.58	XX	73.74	XX	83.84	XX	83.63
Aug 02	XX	88.58	XX	73.74	XX	83.84	XX	83.63
Sep 02	XX	90.00	XX	79.92	XX	87.96	XX	83.63
Oct 02	XX	90.00	XX	79.92	XX	91.29	XX	83.63
Nov 02	XX	90.95	XX	81.56	XX	92.62	XX	84.40
Dec 02	XX	90.95	XX	81.62	XX	92.62	XX	84.40
Jan 03	XX	90.95	XX	81.62	XX	92.98	XX	84.40
Feb 03	XX	93.01	XX	81.90	XX	92.98	XX	85.0

Exhibit OSS-1 provides greater detail on the individual segments (Residence, Business, UNE and LNP) relative to total mechanized LSR volumes eligible for flow through.

Provided in the analysis below is a more detailed assessment of the flow through improvement plan by each segment:

#### UNE

BellSouth fully expects to meet the % Flow Through UNE benchmark of 85% with September flow through results. This is particularly important because the UNE segment comprises approximately 49% of total mechanized LSR volume for results reported June 2002.

### **Residence Resale**

BellSouth expects to demonstrate noticeable progress toward meeting the % Flow Through Residence benchmark of 95% with projected flow through results of 93.01% with February 2003 results. However, based on early projections, the additional 2% needed to meet this benchmark is not expected until fourth quarter of 2003. The flow through improvement needed in the residence segment requires that BellSouth fix a large number of error codes with low LSR volume to realize a 2% flow through improvement. The residence segment comprises approximately 45.6% of total mechanized LSR volume for results reported June 2002.

### **Business Resale**

BellSouth expects to make progress toward meeting the % Flow Through Business benchmark of 90%. However, BellSouth's assessment of the flow through data in this segments reveals that BellSouth will be unable to attain a 90% benchmark. The complexity and relative small volumes associated with this segment does not allow for many significant improvement opportunities to realize significant flow through improvement. While BellSouth is committed to improving flow through in each segment, this segment's complexity coupled with its volume makes it difficult to realize significant flow through improvement beyond about 82%. The business segment now comprises 1.8% of total mechanized LSR volume for results reported June 2002.

### **LNP**

BellSouth has met or exceeded the flow through benchmark of 85% nine out of the last ten months. June 2002 % LNP flow through was 83.63%. Prior to this Commission's Order to implement facilities check before firm order confirmation ("FOC"), BellSouth consistently met the SQM benchmark. LNP % flow through has dropped from 89.8% in May 2002 to 83.63% in June 2002. The facilities check before

FOC was implemented with Release 10.5 on June 1, 2002.<sup>1</sup> Prior to facilities check, the FOC could be sent to the ALEC while the service order was in assignable order (“AO”) status. The AO status is assigned to the service order prior to the facilities check. In LNP, this counted as flow through even if downstream provisioning errors that can produce other service order edit routine (SOER) errors were generated later. Now the FOC cannot be returned until the service order is in pending dispatch (“PD”) or pending facilities (“PF”) status. The service order cannot proceed to facilities check with (“SOER”) errors, so the service representative now has to clear the errors prior to returning the FOC.

Without request type B, loop + LNP, LNP flow through in June is 89.98%. Before implementing this feature, the flow through improvement plan did not necessitate including this segment in the process. Consequently, BellSouth will pursue possible feature enhancements to achieve 85% flow through improvement in LNP to achieve this benchmark, given the special requirement placed on BellSouth by this Commission to perform a facility check before FOC. The LNP segment comprises approximately 3.4% of total mechanized LSR volume for results reported June 2002.

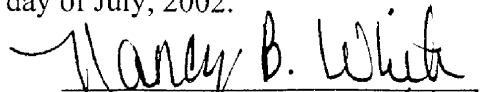
### CONCLUSION

To comply with this Commission’s Order, BellSouth plans to take the steps outlined in this proposal to demonstrate noticeable progress toward meeting the flow through benchmarks. As part of the flow through improvement plan, BellSouth would like to provide this Commission with an update of progress made toward reaching those benchmarks in addition to the Service Quality Measurement Reports that are filed monthly with the Commission. BellSouth proposes to update this plan for the Commission on October 30, 2002.


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<sup>1</sup> As a result, one Florida ALEC’s flow through rate dropped from 78% to 11% in June after facility check before a FOC was implemented.

Respectfully submitted this 30th day of July, 2002.

  
NANCY B. WHITE (CA)

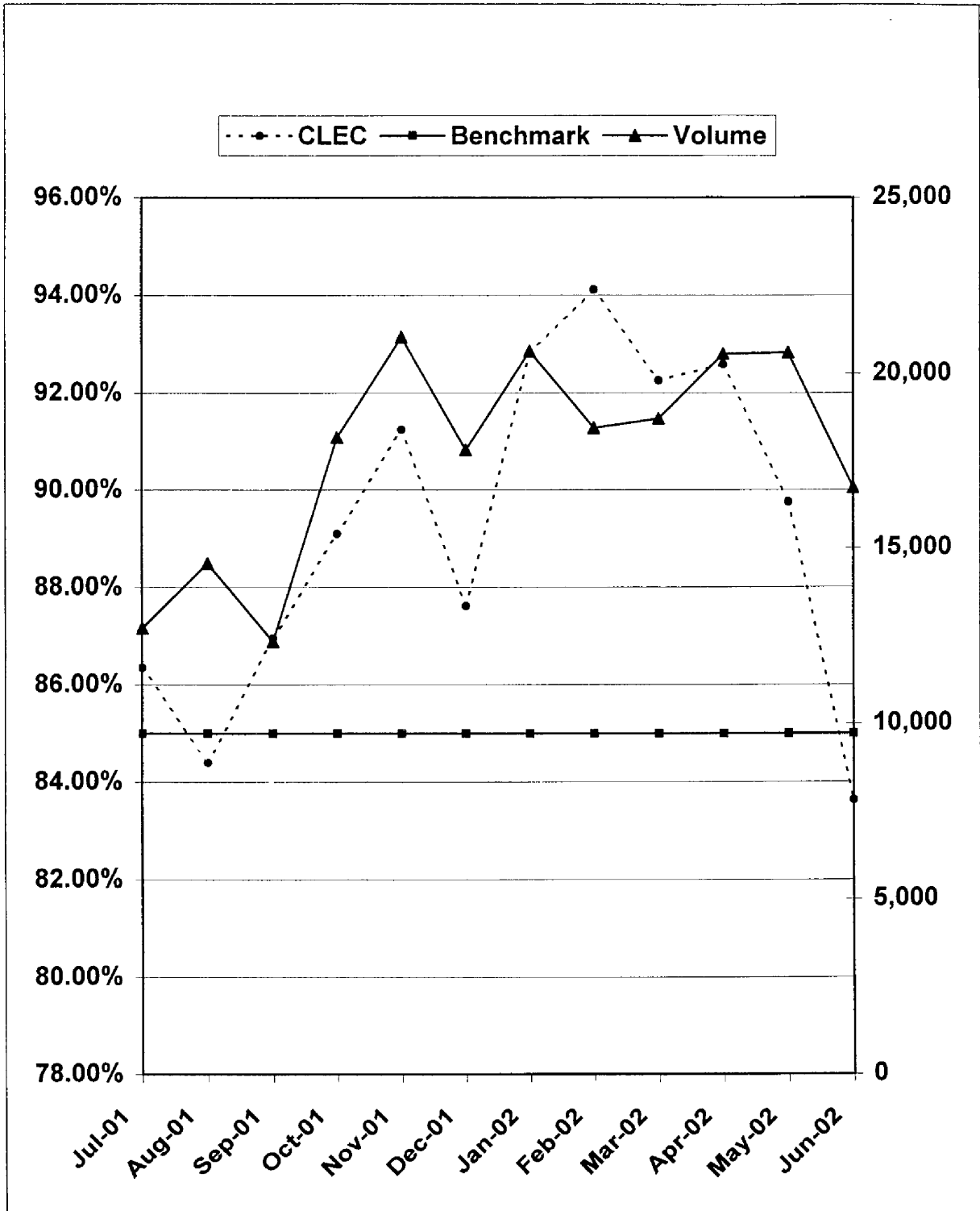
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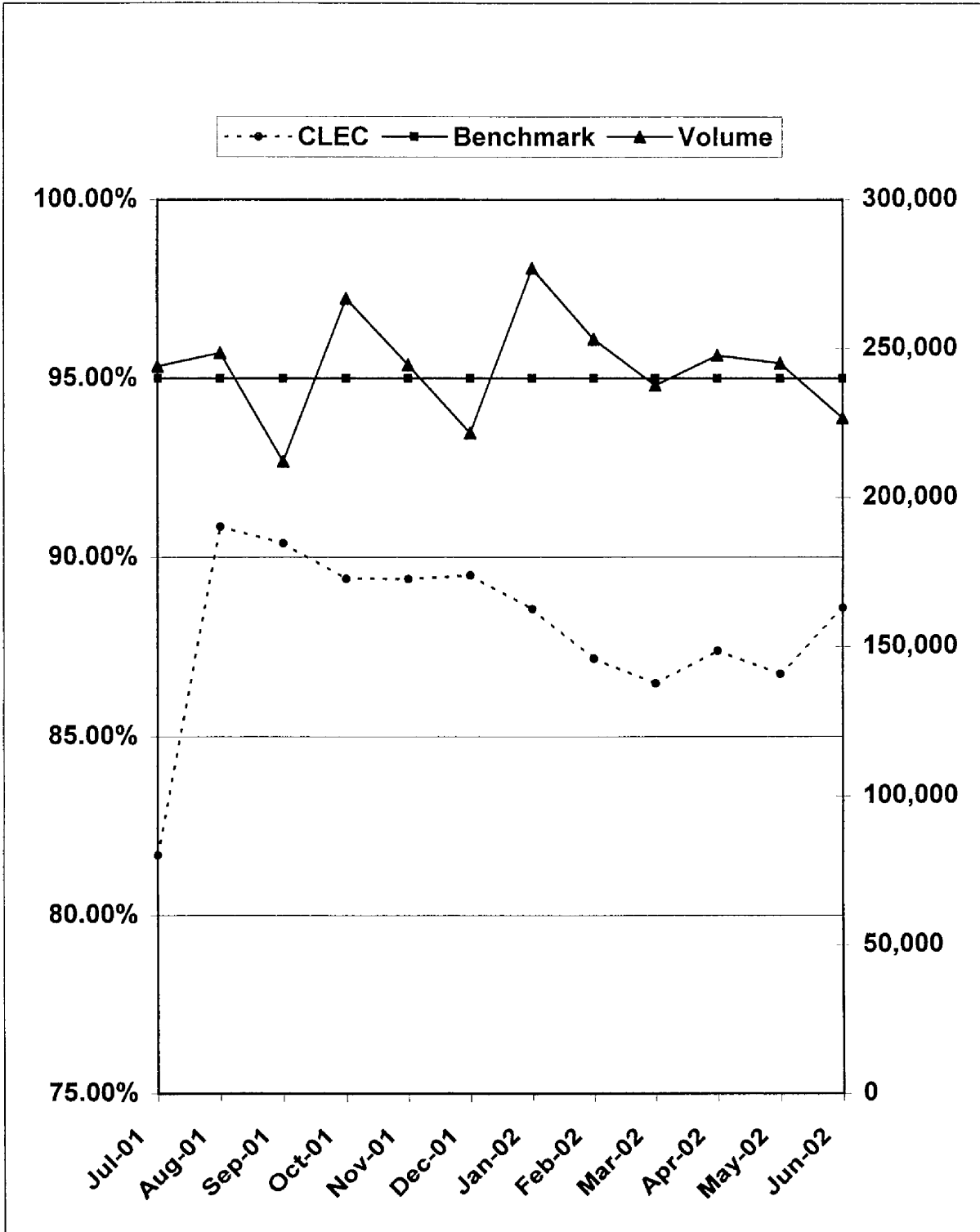
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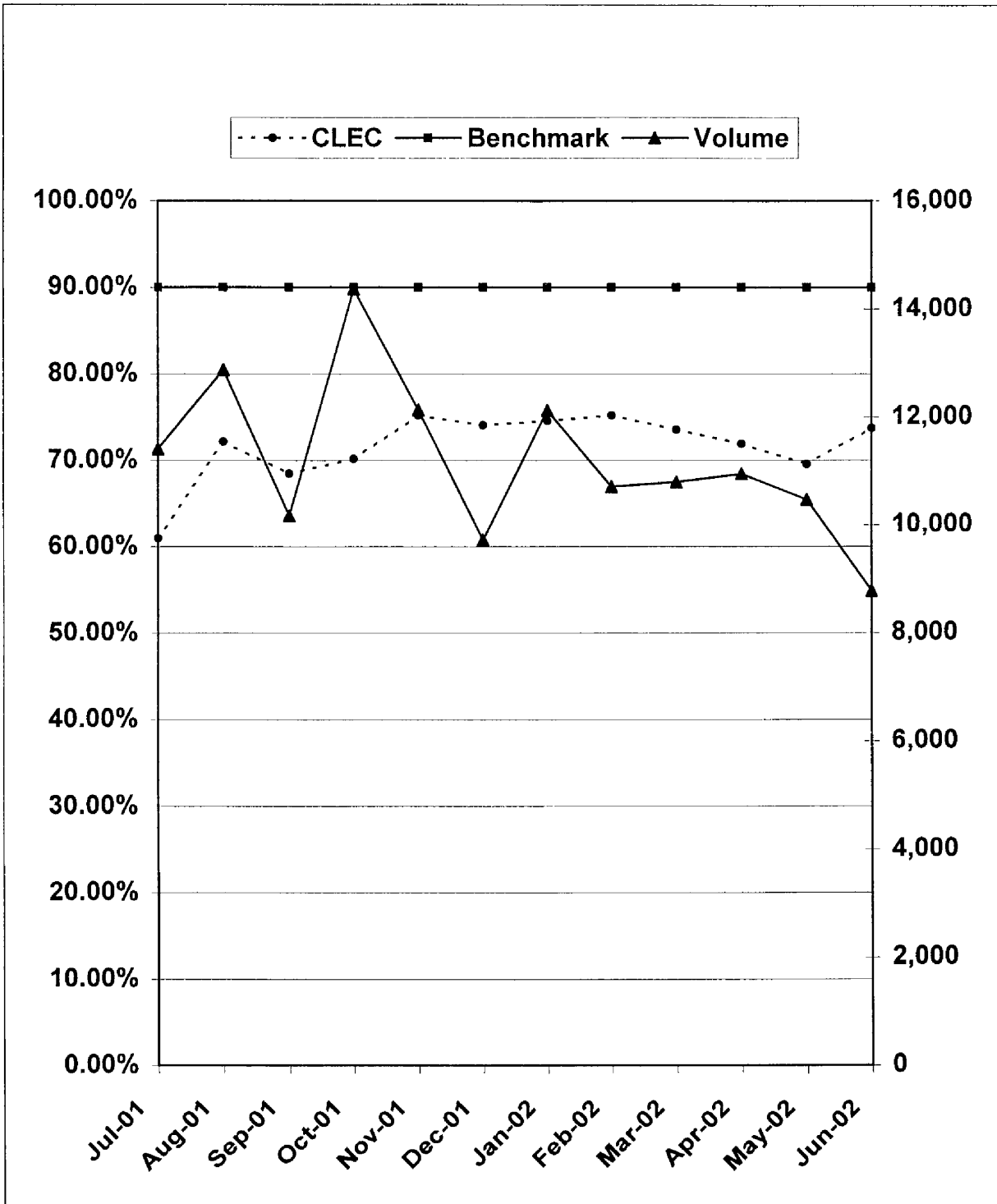
**Florida Interim, July 2001 - June 2002**  
**General - Flow Through - LNP (Chart F.1.3.1)**  
**% Flow Through Service Requests**  
 Volume indicates total number of Mechanized LSR Submissions



**Florida Interim, July 2001 - June 2002**  
**General - Flow Through - Residence (Chart F.1.1.3)**  
**% Flow Through Service Requests**  
**Volume indicates total number of Mechanized LSR Submiss**

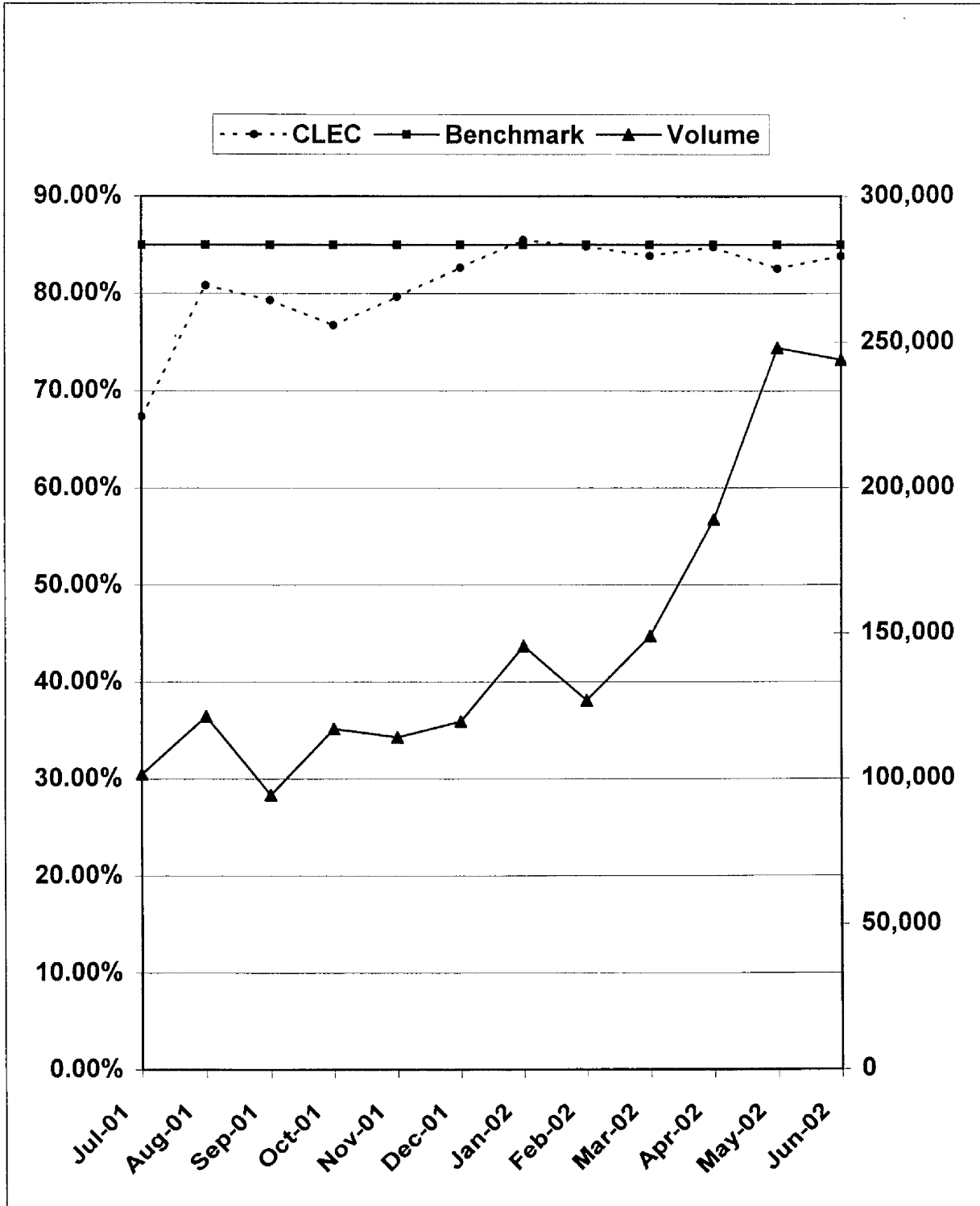


Florida Interim, July 2001 - June 2002  
 General - Flow Through - Business (Chart F.1.1.4)  
 % Flow Through Service Requests  
 Volume indicates total number of Mechanized LSR Submissions

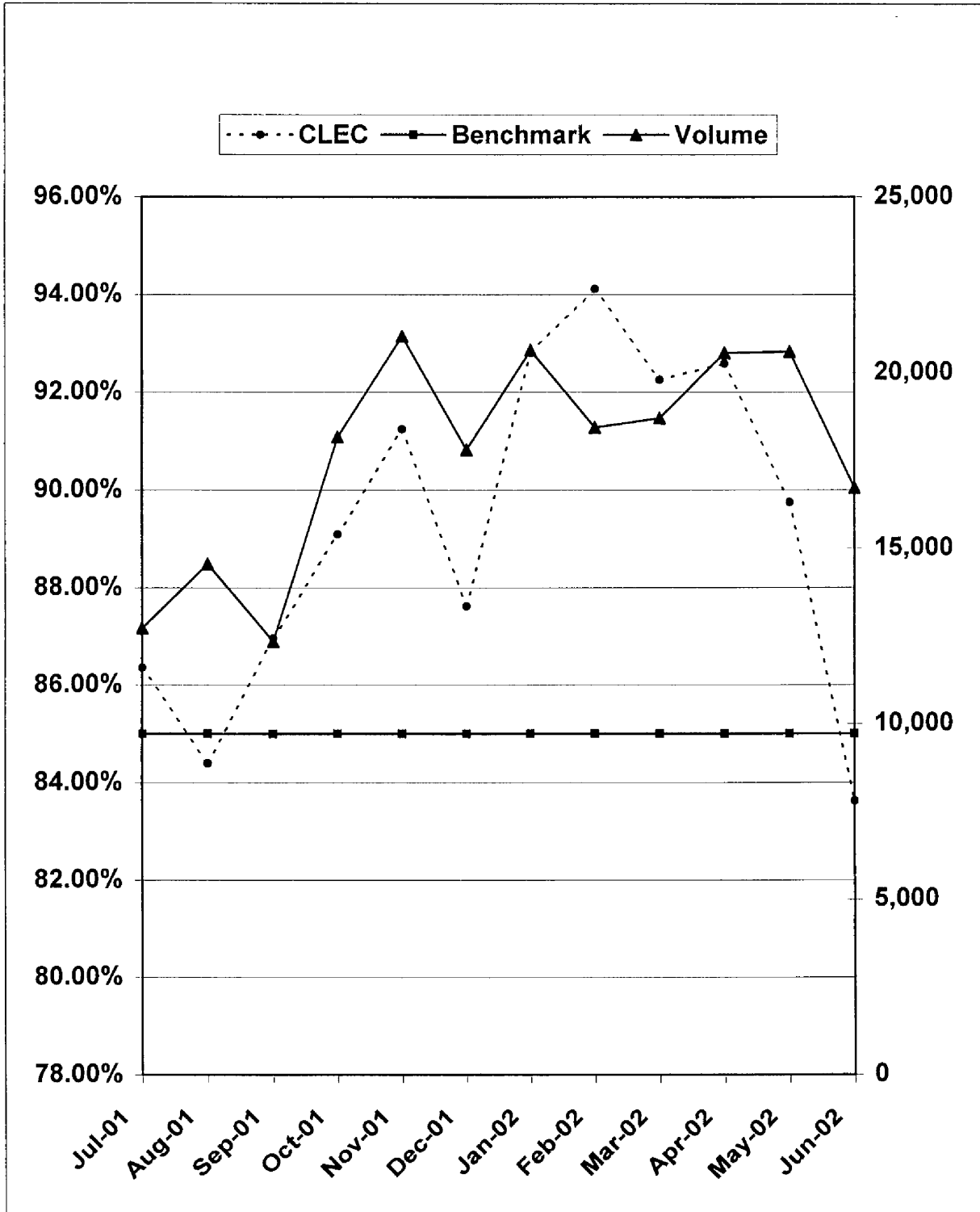




**Florida Interim, July 2001 - June 2002**  
**General - Flow Through - UNE (Chart F.1.1.5)**  
**% Flow Through Service Requests**  
**Volume indicates total number of Mechanized LSR Submis**



**Florida Interim, July 2001 - June 2002**  
**General - Flow Through - LNP (Chart F.1.3.1)**  
**% Flow Through Service Requests**  
**Volume indicates total number of Mechanized LSR Submissions**



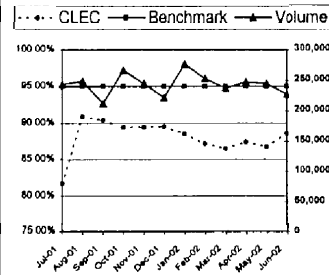
**July 2001 - June 2002  
General - Flow Through  
% Flow Through Service Requests**

(% of LSRs submitted electronically that flow through and reach a status for an FOC to be issued without manual intervention)

Numerator indicates total number of LSRs that flowed through the system.

Volume indicates total number of Mechanized LSR Submissions

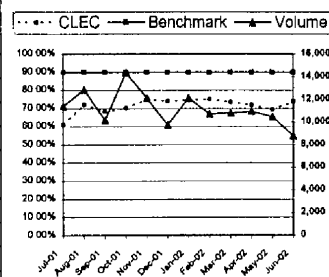
	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	SIDev	ZScore	Equity
Jul-01	95.00%			81.68%	158,833	244,057			NO
Aug-01	95.00%			90.86%	178,854	248,610			NO
Sep-01	95.00%			90.35%	148,887	212,130			NO
Oct-01	95.00%			85.40%	183,445	268,809			NO
Nov-01	95.00%			95.40%	169,113	244,533			NO
Dec-01	95.00%			96.50%	153,792	221,718			NO
Jan-02	95.00%			88.56%	188,318	276,926			NO
Feb-02	95.00%			87.17%	165,367	253,123			NO
Mar-02	95.00%			96.49%	155,437	237,652			NO
Apr-02	95.00%			87.39%	169,874	247,694			NO
May-02	95.00%			86.74%	165,589	245,039			NO
Jun-02	95.00%			88.58%	155,119	226,834			NO



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**F.1.1.4 Business/Region (%)**

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	SIDev	ZScore	Equity
Jul-01	90.00%			63.50%	3,899	11,411			NO
Aug-01	90.00%			72.14%	5,383	12,879			NO
Sep-01	90.00%			88.47%	3,859	10,172			NO
Oct-01	90.00%			70.17%	5,438	14,367			NO
Nov-01	90.00%			75.18%	4,813	12,134			NO
Dec-01	90.00%			74.97%	3,925	9,724			NO
Jan-02	90.00%			74.56%	5,106	12,122			NO
Feb-02	90.00%			76.20%	4,504	10,709			NO
Mar-02	90.00%			73.55%	4,287	10,800			NO
Apr-02	90.00%			71.66%	4,327	10,948			NO
May-02	90.00%			90.54%	4,158	10,474			NO
Jun-02	90.00%			73.74%	3,586	8,779			NO



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**July 2001 - June 2002  
General - Flow Through  
% Flow Through Service Requests**

(% of LSRs submitted electronically that flow through and reach a status for an FOC to be issued without manual intervention)

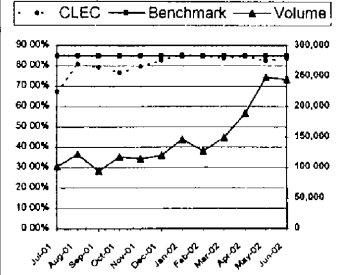
Numerator indicates total number of LSRs that flowed through the system.

Volume indicates total number of Mechanized LSR Submissions

F.1.1.5

UNE/Region (%)

	Benchmark	Numerator	Volume	CLEC	Numerator	Volume	StDev	ZScore	Equity
Jul-01	85.00%			67.36%	48,352	101,599			NO
Aug-01	88.00%			80.82%	68,055	121,594			NO
Sep-01	85.00%			79.33%	51,515	94,392			NO
Oct-01	85.00%			78.74%	59,832	117,270			NO
Nov-01	85.00%			73.00%	61,429	114,267			NO
Dec-01	85.00%			62.07%	68,578	119,769			NO
Jan-02	85.00%			85.60%	92,337	146,792			YES
Feb-02	85.00%			84.80%	77,334	127,006			NO
Mar-02	85.00%			83.88%	89,405	149,121			NO
Apr-02	85.00%			54.78%	117,389	189,007			NO
May-02	85.00%			62.57%	144,533	248,097			NO
Jun-02	85.00%			83.84%	159,190	244,024			NO



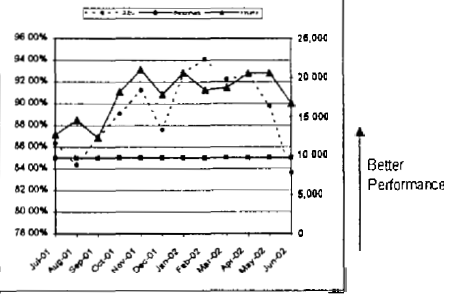
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**July 2001 - June 2002  
General - Flow Through  
% Flow Through Service Requests - LNP**

(% of LSRs submitted electronically that flow through and reach a status for an FOC to be issued without manual intervention)  
Numerator indicates total number of LSRs that flowed through the system.  
Volume indicates total number of Mechanized LSR Submissions

**F.1 3.1 Summary/Region (%)**

	Benchmark	Numerator	Volume	CLE	Numerator	Volume	SIDev	ZScore	Equity
Jul-01	85.00%			86.36%	4,197	12,731			YES
Aug-01	85.00%			84.40%	3,949	14,557			NO
Sep-01	85.00%			88.80%	4,041	12,350			YES
Oct-01	85.00%			89.09%	7,785	18,189			YES
Nov-01	85.00%			81.24%	9,635	21,034			YES
Dec-01	85.00%			87.82%	7,274	17,807			YES
Jan-02	85.00%			92.81%	9,236	20,839			YES
Feb-02	85.00%			84.12%	8,513	18,446			YES
Mar-02	85.00%			82.25%	8,811	18,705			YES
Apr-02	85.00%			92.59%	10,531	20,563			YES
May-02	85.00%			93.75%	9,766	20,604			YES
Jun-02	85.00%			83.83%	7,181	16,722			NO



Better Performance

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