

LAW OFFICES
Messer, Caparello & Self
A Professional Association

Post Office Box 1876
Tallahassee, Florida 32302-1876
Internet: www.lawfla.com

November 15, 2002

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 000121B-TP

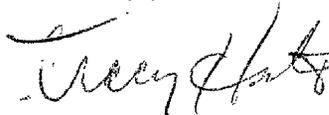
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC, TCG South Florida, Inc., MCI WorldCom Communications, Inc. and Covad Communications, Inc. ("Joint ALECs") are an original and fifteen copies of the Comments of Joint ALECs on Staff's Proposal in the above referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,



Tracy W. Hatch

TWH/amb
Enclosure
cc: Virginia Tate, Esq.

DOCUMENT NUMBER CASE

12571 NOV 15 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the establishment of operations support systems permanent performance measures (Sprint Track)) Docket No. 000121B-TP
)
) Filed: November 15, 2002
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_____)

COMMENTS OF JOINT ALECS ON STAFF'S PROPOSAL

COMES NOW AT&T Communications of the Southern States, LLC and TCG South Florida, Inc., MCI WorldCom Communications, Inc., and Covad Communications, Inc. (hereinafter "Joint ALECs") and pursuant to the procedural schedule in this proceeding file their Comments to the Staff's Proposal.

The Joint ALECs support the Staff Proposal for the Sprint Wholesale Performance Measurement Plan, and agree with Staff that Sprint should be able to readily and quickly transfer this plan to Florida, as it currently exists in other states, including North Carolina. While this current plan is not as comprehensive as the performance requirements in place for BellSouth, it is nonetheless a substantive initial plan that should provide useful data with which the Commission and ALECs can monitor Sprint's performance¹. The Joint ALECs' endorsement is predicated on the Staff's proposal in Issue 7 for the implementation of six-month reviews, which will provide timely opportunities to seek improvements to the plan².

The Joint ALECs also request that the Staff consider requiring Sprint to conduct an educational workshop on any plan ordered by the Commission so that ALECs can

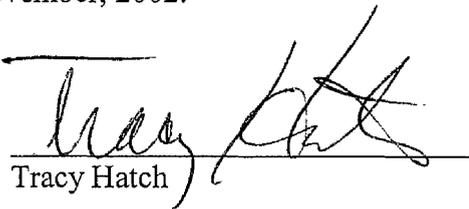
¹ The Joint ALECs have concerns with the existing BellSouth plan and are seeking numerous areas of improvement in the BellSouth track of this docket. Additionally, the ALECs note that in some cases, the Sprint plan is more stringent than the BellSouth plan. For example, it includes affiliate data, its Measure 7 - Average Completed Interval measurement begins with the receipt of an LSR (not the FOC), and the benchmark for Measure 44 - Center Responsiveness, is 20 seconds.

² The Joint ALECs have an interest in adding an enforcement mechanism and note that in Issue 10 the Staff will indicate that this issue can be addressed in the six-month review.

ensure they are correctly interpreting the Plan and associated reports. It would also be useful to understand the timelines for standards not currently in effect. For example, Measure 2, the Average FOC Notice Interval, for all electronic orders, has a benchmark of TBD. Similarly, for Measure 4, Percent of Flow-through Orders, the Plan states “the process to evaluate performance on this measure is under development. Issues, if any, are not yet finally defined. Final resolution depends on completed development of an agreed to Flow-Through Plan.” It would be useful to understand what work has been done in this area and how Florida ALECs can become involved in the development of this Flow-Through Plan. This workshop could also include an update on planned changes from Nevada as these will be candidates for inclusion in the Florida Plan.

The Joint ALECs appreciate the work of the Staff in preparing this proposal and for the opportunity to provide comments.

Respectfully filed this 15th day of November, 2002.


Tracy Hatch

Attorney filing on behalf of
AT&T Communications of the
Southern States, LLC; TCG South Florida,
Inc., MCI WorldCom Communications,
Inc., and Covad Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via

Hand Delivery (*) and/or U.S. Mail this 15th day of November, 2002.

Felicia Banks, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Charles J. Rehwinkel, Esq.
Susan Masterton, Esq.
Mr. F. Ben Poag
Sprint-Florida, Incorporated
MC FLTHO0107
P.O. Box 2214
Tallahassee, FL 32399-2214

Michael A. Gross, Esq.
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Cable Telecommunications
Association, Inc.
246 East 6th Avenue
Tallahassee, FL 32303

Donna McNulty, Esq.
WorldCom, Inc.
1203 Governors Square Blvd, Suite 201
Tallahassee, FL 32301-2960

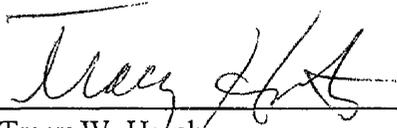
Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson, Bell &
Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302-2095

Ms. Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069

Kimberly Caswell, Esq.
Verizon Select Services, Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Joseph McGlothlin, Esq.
Vicki Kaufman, Esq.
McWhirter Law firm
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. William H. Weber
Covad communications Company
19th Floor, Promenade, II
1230 Peachtree Street, NE
Atlanta, GA 30309-3574


Tracy W. Hatch