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February 12, 2003

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 for incumbent local exchange telecommunications companies (BellSouth Track)
Docket No. 000121A-TL

AT&T Communications of the Southern States, LLC, on behalf of the ALEC Coalition, hereby files the original and 15 copies of the ALEC Coalitions Response to Staff Questions from January 22, 2003, conference call regarding Service Quality Measurement issues.

Please stamp the extra copy and return to Lisa Riley in the enclosed envelope. Thank you and please contact Ms. Riley on 404-810-7812 if there are any questions regarding this matter.

Sincerely,

Virginia Tate

Enclosures

cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail on this 12th day of February 2003 to:

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Virginia C. Tate

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment of Operations Support System Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth Track)	)	Docket No. 000121A-TP Filed: February 12, 2003

ALEC COALITION RESPONSE TO STAFF QUESTIONS FROM JANUARY 22, 2003 CONFERENCE CALL REGARDING SERVICE QUALITY MEASUREMENT ISSUES

The ALEC Coalition[1] hereby files its Response to questions raised by the Florida Public Service Commission Staff ("Staff") during a conference call held on January 22, 2003, between the Staff, BellSouth and the ALECs.

ORIGINAL ITEMS 15, 16, 17, 18, 19, 20, 21, 22, 23, 24

In its November 19, 2002 filing, the ALEC Coalition had contended that BellSouth's PARIS reports only provide the remedy amount, not the information necessary to inform ALECs of the level and degree of noncompliance. Without information on the level and degree of noncompliance, the ALECs are unable to judge the relative severity of the violations and to develop plans for seeking improved performance.

Staff requested that the ALEC Coalition provide a template of the remedy report requested by the ALEC Coalition. Attachment I contains the remedy report template.

Additionally, Staff requested a response to the following question: "Why are the MSS reports not a substitute for performance details associated with remedy reporting?"

[1] For purposes of these comments, the ALEC Coalition consists of AT&T Communications of the Southern States, Inc., ("AT&T"), WorldCom, Inc. ("WorldCom"), and DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad").

The MSS Reports and SEEM are governed by different methodologies that may generate different results. The methodology used to determine parity in SEEM differs substantially from the statistical methodology used in the MSS reports. Unlike the MSS reports, in SEEM, data are disaggregated into cells, modified Z scores determined for each cell, and then the cell-level modified Z scores are reaggregated using the truncated Z to derive the test statistic. The MSS reports aggregate all the data for a given submeasure together and use Modified Z to determine the test statistic. Not only are the test statistics derived differently, the MSS report determines compliance by comparing the test statistic to a fixed critical value (-1.65) as opposed to SEEM comparing the test statistic to the Balancing Critical Value which varies with sample size and may be greater or less than – 1.65.

Additionally, the specific set of transactions upon which performance is assessed for a specific submeasure (ordering, provisioning, & maintenance) may differ between the MSS and the remedy reporting. Based on BellSouth's own admissions, the volumes in BellSouth's MSS reporting may represent redundancies in that an individual ALEC transaction may be captured in multiple submeasures for a given metric. (See Attachment II entitled "NC SQM Product Disaggregation/Where a product falls into more than 1 SQM Product Group".) As an example, the completion of a specific order for "UNE 2W ADSL w/o Loop Modification" can be included in both the calculation of UNE Digital Loop<DS1 and UNE x-DSL w/o Loop Modification OCI submeasures in the MSS.

Respectfully filed this 12th day of February, 2003.

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Attorney filing on behalf of
AT&T Communications of the
Southern States, LLC; TCG South Florida,
Inc., MCI WorldCom Communications,
Inc., ITC DeltaCom, Inc. and DEICA
Communications Inc. d/b/a Covad
Communications Company

ATTACHMENT I

FLORIDA REMEDY REPORT

TIER I SUBMEASURE	PASS/FAIL INDICATOR	PERFORMANCE STANDARD B/P	BENCHMARK PERCENT	TRUNCATED Z SCORE	BALANCING CRITICAL VALUE	BST METRIC RESULT	BST VOLUME	ALEC METRIC RESULT	ALEC VOLUME	FEE SCHEDULE AMOUNT

NC SQM Product Disaggregation
Where a product falls into more than 1 SQM Product Group

Process area	Ordering
Type	Resale and Retail

Product Description	NC SQM Product Disagg Group
CENTREX/ESSX	Business CENTREX
DID Trunk	Business PBX
ISDN Business	Business ISDN
ISDN Residence	ISDN Residence
PBX	Business PBX

Process area	Ordering
Type	Wholesale only

Product Description	NC SQM Product Disagg Group
UNE 2W ADSL w Bridge Tap Removal - Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop
UNE 2W ADSL w Load Coil & Bridge Tap Removal - Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop
UNE 2W ADSL w Load Coil Removal - Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop
UNE 2W ADSL w/o Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop
UNE 2W HDSL w Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE 2W HDSL w Load Coil & Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE 2W HDSL w Load Coil Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE 2W HDSL w/o Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE 2W ISDN Loop (Basic Rate) w INP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) w LNP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) w/o NP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W UDC (Universal Digital Channel) Capable Loop	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 4W HDSL w Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop

UNE 4W HDSL w Load Coil & Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE 4W HDSL w Load Coil Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE 4W HDSL w/o Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE Sub-Loop Feeder - 2W UDC (Universal Digital Channel) Capable Loop	UNE - Digital Loop < DS1 UNE - ISDN Loop

NC SQM Product Disaggregation
Where a product falls into more than 1 SQM Product Group

Process area	Provisioning
Type	Resale and Retail

Product Description	NC SQM Product Disagg Group
CENTREX/ESSX Non-Design	Business CENTREX
ISDN Basic Rate Business Non-Design	Business ISDN
ISDN Basic Rate Residence Non-Design	ISDN Residence
ISDN Primary Rate Business Non-Design	Business ISDN
ISDN Primary Rate Megalink (1.544 MBPS) Business Non-Design	Business ISDN
ISDN Primary Rate Megalink (1.544 MBPS) Residence Non-Design	ISDN Residence
ISDN Primary Rate Residence Non-Design	ISDN Residence
PBX Non-Design	Business PBX

Process area	Provisioning
Type	Wholesale only

Product Description	NC SQM Product Disagg Group
UNE 2W ADSL w Bridge Tap Removal - Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W ADSL w Load Coil & Bridge Tap Removal - Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W ADSL w Load Coil Removal - Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W ADSL w/o Loop Modification	UNE - Digital Loop < DS1 UNE - x-DSL Loop UNE - x-DSL Loop w/o Loop Conditioning
UNE 2W HDSL w Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W HDSL w Load Coil & Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop

	UNE - x-DSL Loop w Loop Conditioning
UNE 2W HDSL w Load Coil Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W HDSL w/o Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop UNE - x-DSL Loop w/o Loop Conditioning
UNE 2W ISDN Loop (Basic Rate) Design	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Design w INP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Design w LNP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Design w/o NP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Non-Design	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Non-Design w INP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Non-Design w LNP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Non-Design w/o NP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W UDC (Universal Digital Channel) Capable Loop	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W Unbundled Copper Loop (UCL) Long (> 18 kft) w Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W Unbundled Copper Loop (UCL) Long (> 18 kft) w Load Coil & Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W Unbundled Copper Loop (UCL) Long (> 18 kft) w Load Coil Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W Unbundled Copper Loop (UCL) Long (> 18 kft) w/o Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w/o Loop Conditioning
UNE 2W Unbundled Copper Loop (UCL) Short (<= 18 kft) w Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W Unbundled Copper Loop (UCL) Short (<= 18 kft) w Load Coil & Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W Unbundled Copper Loop (UCL) Short (<= 18 kft) w Load Coil Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 2W Unbundled Copper Loop (UCL) Short (<= 18 kft) w/o Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w/o Loop Conditioning
UNE 4W HDSL w Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W HDSL w Load Coil & Bridge Tap Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop

	UNE - x-DSL Loop w Loop Conditioning
UNE 4W HDSL w Load Coil Removal - Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W HDSL w/o Loop Modification	UNE - Digital Loop => DS1 UNE - x-DSL Loop UNE - x-DSL Loop w/o Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Long (> 18 kft) w Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Long (> 18 kft) w Load Coil & Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Long (> 18 kft) w Load Coil Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Long (> 18 kft) w/o Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w/o Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Short (<= 18 kft) w Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Short (<= 18 kft) w Load Coil & Bridge Tap Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Short (<= 18 kft) w Load Coil Removal - Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w Loop Conditioning
UNE 4W Unbundled Copper Loop (UCL) Short (<= 18 kft) w/o Loop Modification	UNE - x-DSL Loop UNE - x-DSL Loop w/o Loop Conditioning
UNE Sub-Loop Feeder - 2W UDC (Universal Digital Channel) Capable Loop	UNE - Digital Loop < DS1 UNE - ISDN Loop

Process area	**Provisioning**
Type	**Retail Analog**

Product Description	**NC SQM Product Disagg Group**
ADSL Services	ADSL Services Digital Loop < DS1 Services
ADSL Services (Business/Commercial) w Bridge Tap Removal - Loop Modification	ADSL Services Digital Loop < DS1 Services
ADSL Services (Business/Commercial) w Load Coil & Bridge Tap Removal - Loop Modification	ADSL Services Digital Loop < DS1 Services
ADSL Services (Business/Commercial) w Load Coil Removal - Loop Modification	ADSL Services Digital Loop < DS1 Services
ADSL Services (Business/Commercial) w/o Loop Modification	ADSL Services Digital Loop < DS1 Services
ADSL Services (Non-Business/Non-Commercial) w Bridge Tap Removal - Loop Modification	ADSL Services Digital Loop < DS1 Services

NC SQM Product Disaggregation
Where a product falls into more than 1 SQM Product Group

ADSL Services (Non-Business/Non-Commercial) w Load Coil & Bridge Tap Removal - Loop Modification	ADSL Services Digital Loop < DS1 Services
ADSL Services (Non-Business/Non-Commercial) w Load Coil Removal - Loop Modification	ADSL Services Digital Loop < DS1 Services
ADSL Services (Non-Business/Non-Commercial) w/o Loop Modification	ADSL Services Digital Loop < DS1 Services
Business	Residence and Business Residence and Business (POTS) Residence, Business and Design
CENTREX/ESSX Design	Design Residence, Business and Design
CENTREX/ESSX Non-Design	Residence and Business Residence, Business and Design
Design	Design Residence, Business and Design
Digital Loop < DS1 Services	Design Digital Loop < DS1 Services Residence, Business and Design
Digital Loop >= DS1 Services	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Basic Rate Business Design	Design Digital Loop < DS1 Services ISDN Basic Rate Service Residence, Business and Design
ISDN Basic Rate Business Non-Design	Digital Loop < DS1 Services ISDN Basic Rate Service Residence and Business Residence, Business and Design
ISDN Basic Rate Residence Design	Design Digital Loop < DS1 Services ISDN Basic Rate Service Residence, Business and Design
ISDN Basic Rate Residence Non-Design	Digital Loop < DS1 Services ISDN Basic Rate Service Residence and Business Residence, Business and Design
ISDN Primary Rate Business Design	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Primary Rate Business Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
ISDN Primary Rate Megalink (1.544 MBPS) Business Design	Design Digital Loop >= DS1 Services Residence, Business and Design

NC SQM Product Disaggregation
Where a product falls into more than 1 SQM Product Group

ISDN Primary Rate Megalink (1.544 MBPS) Business Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
ISDN Primary Rate Megalink (1.544 MBPS) Residence Design	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Primary Rate Megalink (1.544 MBPS) Residence Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
ISDN Primary Rate Residence Design	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Primary Rate Residence Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
PBX Design	Design Residence, Business and Design
PBX Non-Design	Residence and Business Residence, Business and Design
Residence	Residence and Business Residence and Business (POTS) Residence, Business and Design

NC SQM Product Disaggregation
Where a product falls into more than 1 SQM Product Group

Process area	Mtce and Repair
Type	Resale and Retail

Product Description	NC SQM Product Disagg Group
CENTREX/ESSX Non-Design	Business CENTREX
ISDN Basic Rate Business Non-Design	Business ISDN
ISDN Basic Rate Residence Non-Design	ISDN Residence
ISDN Primary Rate Business Non-Design	Business ISDN
ISDN Primary Rate Megalink (1.544 MBPS) Business Non-Design	Business ISDN
ISDN Primary Rate Megalink (1.544 MBPS) Residence Non-Design	ISDN Residence
ISDN Primary Rate Residence Non-Design	ISDN Residence
PBX Non-Design	Business PBX

Process area	Mtce and Repair
Type	Wholesale only

Product Description	NC SQM Product Disagg Group
UNE 2W ADSL	UNE - Digital Loop < DS1 UNE - x-DSL Loop
UNE 2W HDSL	UNE - Digital Loop => DS1 UNE - x-DSL Loop
UNE 2W ISDN Loop (Basic Rate) Design	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Design w/o NP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Non-Design	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W ISDN Loop (Basic Rate) Non-Design w/o NP	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 2W UDC (Universal Digital Channel) Capable Loop	UNE - Digital Loop < DS1 UNE - ISDN Loop
UNE 4W HDSL	UNE - Digital Loop => DS1

	UNE - x-DSL Loop
UNE Sub-Loop Feeder - 2W UDC (Universal Digital Channel) Capable Loop	UNE - Digital Loop < DS1 UNE - ISDN Loop

Process area	**Mtce and Repair**
Type	**Retail Analog**

Product Description	**NC SQM Product Disagg Group**
ADSL Services	ADSL Services Digital Loop < DS1 Services
Business	Residence and Business Residence and Business (POTS) Residence, Business and Design
CENTREX/ESSX Design	Design Residence, Business and Design
CENTREX/ESSX Non-Design	Residence and Business Residence, Business and Design
Design	Design Residence, Business and Design
Digital Loop < DS1 Services	Design Digital Loop < DS1 Services Residence, Business and Design
Digital Loop >= DS1 Services	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Basic Rate Business Design	Design Digital Loop < DS1 Services ISDN Basic Rate Service Residence, Business and Design
ISDN Basic Rate Business Non-Design	Digital Loop < DS1 Services ISDN Basic Rate Service Residence and Business Residence, Business and Design
ISDN Basic Rate Residence Design	Design Digital Loop < DS1 Services ISDN Basic Rate Service Residence, Business and Design
ISDN Basic Rate Residence Non-Design	Digital Loop < DS1 Services ISDN Basic Rate Service Residence and Business Residence, Business and Design
ISDN Primary Rate Business Design	Design

	Digital Loop >= DS1 Services Residence, Business and Design
ISDN Primary Rate Business Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
ISDN Primary Rate Megalink (1.544 MBPS) Business Design	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Primary Rate Megalink (1.544 MBPS) Business Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
ISDN Primary Rate Megalink (1.544 MBPS) Residence Design	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Primary Rate Megalink (1.544 MBPS) Residence Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
ISDN Primary Rate Residence Design	Design Digital Loop >= DS1 Services Residence, Business and Design
ISDN Primary Rate Residence Non-Design	Digital Loop >= DS1 Services Residence and Business Residence, Business and Design
PBX Design	Design Residence, Business and Design
PBX Non-Design	Residence and Business Residence, Business and Design
Residence	Residence and Business Residence and Business (POTS) Residence, Business and Design