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#### **Matilda Sanders**

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Sent:

Tuesday, November 23, 2004 12:39 PM

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TSauder@birch.com; Nancy Sims; Nancy White; Tracy Hatch; Chris McDonald; Musselwhite,Brian J - LGCRP; Norris,Sharon E - LGCRP; Daniels,Sonia C - LGCRP

Subject:

RE: 000121A -- CLEC Response to 11-4 Action Items



CLEC e 11-4 Action

Docket No. 000121A-TP -- In re: Investigation into the Establishment of Operations Support system Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth track)

Attached please find for electronic filing the CLEC Coalition's Response to Action Items from the November 4, 2004 Informal Conference with Staff in the above-referenced docket. The cover letter, certificate of service and the CLEC Coalition's Response are a total of 10 pages. The attached document should be considered the official version for purposes of the docket file.

As indicated in the cover letter, copies of the CLEC Coalition's Response are being distributed to parties via electronic (in cases where e-mail addresses are available) and U.S. Mail. Thank you for your assistance in this matter.

<<CLEC Response 11-4 Action Item.pdf>>

Sonia Daniels Docket Manager AT&T Law & Gov't Affairs 1230 Peachtree 4th Floor

CMRtlanta GA 30309 Phone: 404-810-8488 COMax: 281-664-9791

CTR \_\_\_\_ ECR \_\_\_ GCL \_\_\_ OPC \_\_\_ MMS \_\_\_

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Tracy Hatch Senior Attorney Law and Government Affairs Southern Region Suite 700 101 N. Monroe Street Tallahassee, FL 32301 850-425-6360

November 23, 2004

#### BY ELECTRONIC FILING

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. 000121A-TP

Dear Ms. Bayó:

Attached please find the CLEC Coalition's Reply to Action Items from the November 4, 2004, Informal Call regarding BellSouth's SQM Six-Month Review in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/scd Attachment

cc: Parties of Record

12540 NOV 23 & FPSC-COMMISSION CLERK

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the CLEC's Reply was

served by U.S. Mail this 23th day of November 2004 to the following:

(\*) Blanca S. Bayo Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 3239-0850

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> s/ Tracy W. Hatch Tracy W. Hatch

ORIGINAL

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment	)	
of Operations Support System Permanent	)	Docket No. 000121A-TP
Performance Measures for Incumbent	)	
Local Exchange Telecommunications	)	Filed: November 23 2004
Companies (BellSouth Track)	) '	
· ·	)	

#### **CLEC COALITION REPLY TO ACTION ITEMS**

Competitive Local Exchange Carriers ("CLECs"), AT&T Communications of the Southern States, LLC; Birch Telecom; DIECA Communications Company d/b/a Covad Communications Company ("Covad"); ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom/BTI"); MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc.; and Network Telephone Corp., hereinafter collectively referred to as the "CLEC Coalition," hereby file the following responses to the Florida Public Service Commission Staff's ("Staff's") request that answers be supplied for the following Action Item from the November 4, 2004 SQM Six-Month Review conference call:

Action Item — 1 CLECs to clarify and further explain changes requested for reporting

Action Item - 1 CLECs to clarify and further explain changes requested for reporting adjustments to SEEM payments.

#### Response:

In its August 18, 2004 filing the CLEC Coalition stated that adjustments and their sources needed to be more clearly explained. Following are recommended changes to the reporting process to improve the information regarding adjustments.

First, for both the Transmitted Payments and Transmitted Balance Reports (for individual CLEC, Tier I and Tier II reports), include a column entitled Adjustment Code. If the adjustment is associated with an RQ, use the RQ code, if not, use the appropriate existing adjustment code. Report at a sub-metric level. Report each adjustment separately. For example, if a particular sub-metric was impacted by two adjustments in a given month, each adjustment would be reported as a separate line item on the report.

Second, a new report (an adjustment table or adjustment source document) would be provided). For each RQ or adjustment code reported as described above, the following information would be provided:

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- RQ or Adjustment Code
- Summary Description of Reason for Adjustment (e.g. if Code MC –Mitigating Circumstances were used, the specific circumstances would be described)
- Date Issue Opened
- Date Issue Corrected/Closed
- Month(s) and Year (s) affected by issue and therefore subject to adjustment.

See Attachment 1 for example of adjustment table.

## Attachment 1

Code	Description	Date Opened	Date Closed	Dates Affected
RQ5687	[Adjustment Summary: Some xDSL, UDC, UCL and EELs orders omitted due to ENCORE Release 16.0.] With the implementation of the ENCORE Release 16.0, BellSouth discovered that changes in the tables caused some xDSL, UDC, UCL and EELs orders to be erroneously omitted from this measure. BellSouth proposes correcting the code to include these Partially Mechanized orders.(RQ5687)	02/2004	04/2004	12/2003 01/2004 02/2004
IC .	BellSouth filed a petition with the Georgia Commission seeking permission to invoke force majeure for January 05 and 06, 2004 ice storm. GA Commission granted petition on April 15, 2004.	02/2004	04/2004	01/2004

# Respectfully submitted this 23<sup>th</sup> day of November, 2004.

## CLEC COALITION

/m
s/Tracy Hatch
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s/ Rose Mulvany Henry
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