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From: Slaughter, Brenda [Brenda.Slaughter@BellSouth.COM]
Sent: Thursday, September 08, 2005 4:40 PM
To: Filings@psc.state.fl.us
Cc: Culpepper, Robert; Linda Hobbs; Fatool, Vicki; Holland, Robyn P; Nancy Sims; Bixler, Micheale
Subject: Docket 000121A-TP (Response to Staff Aug 24)
Importance: High
Attachments: 000121A-TP Response to Staff req of Aug 24.pdf

A. Brenda Slaughter
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 c/o Nancy Sims
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B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth Track).

C. BellSouth Telecommunications, Inc.
 on behalf of Robert A. Culpepper

D. 18 pages total in PDF format

E. BellSouth Telecommunications, Inc.'s Response to Staff's Request of August 24, 2005.

CMP _____
 COM _____
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 RCA _____
 SCR _____
 SGA _____
 SEC 1
 OTH _____

Brenda Slaughter (sent on behalf of Robert A. Culpepper)
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<<000121A-TP Response to Staff req of Aug 24.pdf>>

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Robert A. Culpepper
Senior Regulatory Counsel

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September 8, 2005

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 000121A-TP**

**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

Please find enclosed BellSouth Telecommunications, Inc.'s Response to Florida Public Service Commission Staff's Request of August 24, 2005, which we ask that you file in the captioned docket. Copies have been served to the parties shown on the attached certificate of service.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix
Nancy B. White
R. Douglas Lackey

DOCUMENT NUMBER-DATE

08529 SEP -8 05

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

Electronic Mail and U.S. Mail this 8th day of September, 2005 to the following:

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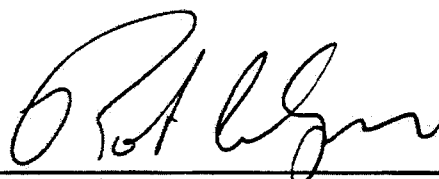
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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to 8/24/05 Request -
May and June 2005 SEEM
Adjustments
September 8, 2005
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REQUEST: UNE-P Tier 1 and 2 SEEM payment history by submeasure for December 2004 to present.

RESPONSE: Attached is the UNE-P Tier 1 & 2 SEEM payment history for December 2004 through June 2005 in file FPSC item 1_8. Worksheet Q1 T1 UNEPC liability by subm contains the Tier 1 liabilities and worksheet Q1 T2 UNEPC liability by subm contains the Tier 2 liabilities.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
BST Response to Staff Request
August 24, 2005
Item No. 1

PUBLIC DISCLOSURE DOCUMENT
(entire document redacted)

BellSouth Telecommunications, Inc.
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Responses to 8/24/05 Request -
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REQUEST: Monthly number of UNE-P lines covered by Market Based Rate Agreements for December 2004 to present.

RESPONSE: The attached file FPSC item 2 reflects the quantity of UNE-P lines assigned to Market Based Rate Agreements by CLEC and for the aggregate of all CLECs for December 2004 through June 2005 in Florida. Each individual CLEC is identified by a code labeled Parent Company Key.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
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PUBLIC DISCLOSURE DOCUMENT
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BellSouth Telecommunications, Inc.
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REQUEST: All Market Based Rate Agreements that have provisions affecting SEEM payments.

RESPONSE: Market Based Agreements are privately negotiated contracts that are not subject to state commission filing requirements. BellSouth's commercial agreements are available for public inspection with certain proprietary information redacted. *See* Carrier Notification Letter SN9108094, dated May 20, 2004, for details. Please contact Mary Rose Sirianni at 850.591.6009 to initiate arrangements to review them. Notwithstanding the forgoing, please see the response to Item 2.

BellSouth Telecommunications, Inc.
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REQUEST: Please make available for staff review the S-Plus code for remedy payment calculations for all measures affected by the audit (AOCCNI, CNI, OCI, MAD, CTRR, OOS, PMIA, PMIAIS, PMRA, PPT and PRT).

RESPONSE: The attached files, FPSC item 5a through FPSC item 5q, are copies of the S-Plus functions used to process Florida data during the PARIS monthly run. Each file contains the code that performs a separate function in the PARIS monthly run. These files are text documents and if viewed electronically can be opened with any text editor (Notepad, Word etc.). Since AOCCNI, CNI and PMIAIS are not valid measures in the Florida SEEM plan no code is available for these measures.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
BST Response to Staff Request
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PUBLIC DISCLOSURE DOCUMENT
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BellSouth Telecommunications, Inc.
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Responses to 8/24/05 Request -
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REQUEST: Please provide an Excel file containing June 2005 cell-level data for at least 2 submeasures within each affected measure (for a random masked CLEC). If possible, one submeasure should contain multiple cells with multiple data and the other submeasure should contain one cell with multiple data and the remaining cells with no data.

RESPONSE: The attached files, FPSC item 6a & 6b, contain cell level data for SEEM adjustments made in June 2005 for the months of December 2004 through April 2005. These files contain data based on PARIS reruns for a specific CLEC for the submetrics UNE-P and UNE Design Loops with less than 10 circuits and were non-dispatched except for Maintenance Average Duration for UNE-P, which used the dispatched submetric because there were no non-dispatched items.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
BST Response to Staff Request
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PUBLIC DISCLOSURE DOCUMENT
(entire document redacted)

REQUEST: BellSouth has indicated to staff that an error occurred and that no Percent Provisioning Troubles in X Days payments were made in May. Please perform a root cause analysis and report the cause of the problem, the dollar impact to SEEM, and the resolution of the issue.

RESPONSE: This problem was caused by an unintended consequence of a software change in the system while implementing an SLC contract agreement with (full details in the RQ comments extract below). This problem was corrected with RQ7006 and implemented in the June 2005 data month. A rerun of May data occurred, which resulted in adjustments totaling \$151,850. These adjustments will be part of the September 15 payment cycle.

A more detailed description follows: An issue has been identified with changes made to the service_order_propnt_vwp view (which resides in the PARIS-owned schema in PMAP.) This view is used to retrieve the PPT-specific results from PMAP for use SEEM's varieties of the PPT measurement.

Changes to the definition of PMAP's so_ticket_rel table (used by the view) mandated by the ATT Service-level agreement in turn mandated changes to the service_order_propnt_vwp. (The changes meant that extra rows were going to be inserted into the so_ticket_rel table in order to permit slightly differing definitions of the PPT measurement to be applied, and which definition applies depends on the value PMAP stores in the so_ticket_rel.data_rcrd_usage_cd.) The net effect was such that the definition of the outer join (performed by service_order_propnt_vwp) of service_order_fci to the so_ticket_rel needed to change: service_order_fci must be outer joined to those rows in the so_ticket_rel for which the data_rcrd_usage_cd = '1'.

RESPONSE: (continued)

To make the change, an extra join conjunct was added to the where clause of the service_order_propnt_vwp, but the wrong outer join syntax ("str.data_rcrd_usage_cd = '1'") was used. (The correct syntax is "str.data_rcrd_usage_cd(+) = '1'.")

Therefore, a change is needed to the following conjunct of the where clause in the view service_order_propnt_vwp:
str.data_rcrd_usage_cd = '1'

The conjunct should be written this way:
str.data_rcrd_usage_cd(+) = '1'

BellSouth Telecommunications, Inc.
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Responses to 8/24/05 Request -
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REQUEST: BellSouth June 2005 Florida PARIS Tier 1 Transmitted Payment Report contains 17 adjustments for previous months with no explanation. Please provide a detailed explanation for each of the adjustments shown on the PARIS report.

RESPONSE: The attached file, FPSC item 1_8, worksheet Q8 T1 Trans Pmt Report Explained lists each of these adjustments and the CLECs affected. In each case these adjustments resulted from instances where we made a payment to the CLEC during the period December 2004 through April 2005 and reruns due to the Liberty audit subsequently showed that no payment was due.

As an explanation, BellSouth posted the following notice on the PMAP website on August 15, 2005:

News Story: Remedy Payments Florida and Tennessee Adjustments

In accordance with the findings of the recently completed SQM/SEEM audit in Florida, BellSouth has made changes to the PARIS code as agreed upon by the PSC Staff and CLECs. The changes impacted pass/fail determination for certain measures: AOCCNI, CNI, MAD, OCI, CTRR, OOS, PMIA, PMIAIS, PMRA, PPT, and PRT.

Further, as outcome of the audit, BellSouth recalculated these measures for data months December, 2004, through May, 2005, in order to correct the calculations. Any difference (in the original remedy paid for the measure and the corrected remedy calculated) is processed as an adjustment with the June, 2005 data month payment issued on August 15, 2005. If a CLEC has a negative balance resulting from a previous overpayment by BellSouth, then The Transmitted Balance by OCN Report in the PARIS report folder will contain any adjustment(s) that will be carried over to the next payment cycle.

If you have any further questions, please submit the FEEDBACK request form for PARIS reports. This form is available under the 'Feedback' link at the top of this page.

(Posted: 8/15/2005 5:34:34 PM)

BellSouth Telecommunications, Inc.
Florida Public Service Commission
BST Response to Staff Request
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Item No. 8

PUBLIC DISCLOSURE DOCUMENT
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BellSouth Telecommunications, Inc.
FPSC Dkt. No. 00121A-TP
Responses to 8/24/05 Request -
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REQUEST: Please identify any other known issues which will or may affect Florida SEEM payment or adjustments in the coming six months.

RESPONSE: Unknown. The potential issues that may affect SEEM payments are far too varied to be specifically enumerated. The source of such issues may be matters outside BellSouth control (for example, Force Majeure situations such as Hurricanes Dennis & Katrina), internal initiatives (such as items included in the monthly PMAP notifications), and operational concerns (such as when certain CLECs change their procedures that affect how we do business – for example, one CLEC issued disconnect and add orders instead of change orders for denial of service). Most of the issues that have affected SEEM payments in the past could potentially recur as well as discovery that SEEM is affected by issues that were not known to affect SEEM previously.