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Sent: Thursday, September 15, 2005 11:24 AM
To: Filings@psc.state.fl.us
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Subject: Florida Docket No. 000121A-TP
Importance: High
Attachments: report.pdf

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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. 14 pages total in PDF format
- E. BellSouth Telecommunications, Inc.'s Supplemental Affidavit of Alphonso J. Varner and the Status Report on Implementation of Changes due to Staff's Recommendations Regarding Liberty's Final Report of the Audit of BellSouth's Performance Assessment Plan for Florida.

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 PSC-COMMISSION OF FLORIDA

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September 15, 2005

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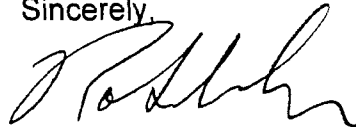
Re: **Docket No. 000121A-TP**

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

Dear Ms. Bayó:

Please find enclosed the Supplemental Affidavit of Alphonso J. Varner and the Status Report on Implementation of Changes due to Staff's Recommendations Regarding Liberty's Final Report of the Audit of BellSouth's Performance Assessment Plan for Florida. A copy of the same is being provided to all parties as reflected in 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

08714 SEP 15 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

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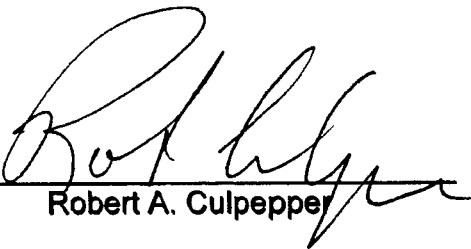
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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)
Of Operations Support Systems Permanent)
Performance Measures for Incumbent)
Local Exchange Telecommunications.)
Companies (BellSouth Track).)

Docket No.: 000121A-TP

Filed: September 15, 2005

SUPPLEMENTAL AFFIDAVIT OF ALPHONSO J. VARNER

1. My name is Alphonso J. Varner. The following statements are made under oath and are based on personal knowledge.

2. I am currently employed by BellSouth Telecommunications, Inc. ("BellSouth") as Assistant Vice President in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My responsibilities include oversight and supervision over BellSouth's personnel that are responsible for maintaining BellSouth's performance measurement plans (collectively, "SQM/SEEM plan"), including any revisions to the SQM/SEEM plan that may be required. Such plans include the SQM/SEEM plan established by the Florida Public Service Commission ("Commission") in this docket.

3. In April 2005, Liberty Consulting ("Liberty") completed an audit of certain aspects of the FL SQM/SEEM plan and issued a final audit report ("Final Report"). Thereafter, BellSouth and certain CLECs submitted comments regarding the findings set forth in the Final Report. After reviewing the Final Report and the comments submitted by the parties regarding the Final Report, the Commission Staff ("Staff") made certain recommendations regarding the Final Report ("Staff Recommendation"). By correspondence dated July 13, 2005, Staff directed BellSouth to take certain action (or in some instances, no action) to implement the Final Report Findings. ("Staff Implementation Request").

4. The purpose of this affidavit is to supplement BellSouth's initial response to the Staff Implementation Request. BellSouth's initial response and accompanying affidavit was filed on September 8, 2005 (collectively, "Initial Response"). The Staff Implementation Request required BellSouth to submit an affidavit that demonstrated that BellSouth had taken action to adequately address certain Final Report Findings and to verify that such action resolved such Findings. This affidavit addresses the Final Report Findings that were not full addressed in the Initial Response, specifically Final Report Findings: 16, 29, 36, 44, 47, and 49. The action undertaken by BellSouth is described in the attached Status Report on Implementation of Changes due to Staff's Recommendation's Regarding Liberty's Final Report of the Audit of BellSouth's Performance Assessment Plan for Florida ("Status Report"). The Status Report is the end product of the efforts undertaken by BellSouth (specifically, the BellSouth personnel who have the obligation to maintain, and when necessary, revise, the SQM/SEEM plan) to implement the Staff Recommendation.

5. This concludes my affidavit.

This 15th day of September, 2005.


ALPHONSO J. VARNER

Sworn to and subscribed
Before me this 15TH
Day of September, 2005

Notary Public



Brenda S. Slaughter
Notary Public, Rockdale County, Georgia
My Commission Expires July 29, 2006

Status Report on Implementation of Changes due to Staff's Recommendations Regarding Liberty's Final Report of the Audit of BellSouth's Performance Assessment Plan for Florida

**Finding 16: BellSouth excluded transactions from the calculation for a measure because it lacked required information about these transactions that were necessary only for another measure.
Classification: 2**

In its processing of the data used for SQM reporting and remedy payment calculations in PMAP, BellSouth assigns error codes when certain data elements are missing or aspects of the transaction do not conform to certain measure requirements. BellSouth then uses these error codes as part of its process for excluding transactions from the measures. During its data integrity analysis, Liberty observed that the error codes used in PMAP are not measure specific. In other words, a transaction receiving an error message because it does not meet the requirements of one measure will be excluded from all measures involving this type of transaction, even if the error was irrelevant to those other measures.

For example, M&R-2 (Customer Trouble Report Rate) can be calculated without knowing the received date of the trouble, but M&R-4 (Percent Repeat Troubles) requires the received date of the record. Nevertheless, all trouble tickets without a valid received date are given an error code and are excluded from all of the measure calculations involving trouble tickets, including M&R-2. When Liberty asked BellSouth about this issue, BellSouth confirmed that this was the case. As another example, P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) is calculated without the field containing the original committed due date of the order. However, if this field is missing, that service order is automatically excluded from the calculation of the P-9 measure regardless of the fact that due date information is irrelevant to the calculation of this measure.

Liberty notes that, while the number of excluded records could be considered "very small" when compared to the total records processed, the number of records excluded with an error code during the three months reviewed by Liberty were not insignificant. For example, for the provisioning measures during the three months subject to this audit, BellSouth excluded over one million service orders from the performance results of the provisioning measures each month. Liberty cannot determine how many of these service orders BellSouth excluded because of missing data fields that would have been unnecessary for some measures. Recognizing BellSouth's concern that the necessary coding revisions may be very complex and yet have limited impact, Liberty recommends that BellSouth conduct a study using the data from one or two months to determine the number of the transactions that it excluded from the SQM and SEEM calculations but for which there was sufficient information to be included in the calculation for some of the measures. The results of this study would allow an informed decision as to whether the problem identified in this finding is significant enough to warrant a change in BellSouth's processing logic.

Response 16: The current PMAP code, which reflects the SQM approved by this Commission and the eight other state regulatory bodies, treats all CLEC and BellSouth records the same. Liberty found that BellSouth had implemented the SQM as ordered by the FPSC. This specific finding indicated that BellSouth is currently excluding data from some of its calculations incorrectly.

Liberty included the following in this Finding "For example, M&R-2 (Customer Trouble Report Rate) can be calculated without knowing the received date of the trouble, but M&R-4 (Percent Repeat Troubles) requires the received date of the record. Nevertheless, all trouble tickets without a valid received date are given an error code and are excluded from all of the measure calculations involving trouble tickets, including M&R-2." BellSouth performed an analysis of the last 12 months (July '04 through June '05) of performance data in Florida for any customer trouble reports that received an error message due to a "null" received date and were excluded from the measurement calculations. There were zero occurrences where the received date was not populated during this twelve month period. Therefore, none of the maintenance measures associated with customer trouble reports was affected by this issue over the last 12 months.

Liberty noted that for the three month period included in their audit, PMAP excluded approximately 1.5 million service orders each month and that BellSouth should conduct a study to determine the number of these records that were actually excluded due to missing or incorrect data. PMAP processes over 350,000 LSRs, 3,000,000 service orders and 2,000,000 trouble tickets each month derived from 227 data feeds delivering over 100,000,000 records to the system. The results of BellSouth's study of almost 5,000,000 provisioning orders indicated that 2.8 million orders were used in the PMAP calculations. Of the remaining 2.2 million orders that were not included in the PMAP calculations: 1) 41% (0.9 million) were administrative orders and properly excluded; 2) 24.4% (0.5 million) were disconnect orders and properly excluded; 3) 19.4% (0.4 million) were canceled and properly excluded; and 4) 16.2% (0.35 million) were internal/official orders and properly excluded. All of these orders should be excluded each month. Out of the original 5 million provisioning orders reviewed, there were 1,931 orders or 0.04% that were not processed due to missing or incorrect data on the order. This number is not material when considering the number of orders processed each month by BellSouth. It should also be noted Liberty found that BellSouth applied the business rules, calculations, exclusions of the SQM as required by the document and the Orders of the PSC.

BellSouth continually reviews the error files and through its validation process identifies any potential defects in the data. Through the monthly Notification Process, BellSouth with the concurrence of the PSCs and the

CLECs makes the appropriate changes to the PMAP code necessary to correct significant errors identified in the PMAP system.

Accordingly, this Finding is considered resolved.

Finding 29: BellSouth included orders with invalid conversion durations in the calculation of the P-7 (Coordinated Customer Conversions Interval) measure. Classification: 2

While conducting the data integrity phase of its audit Liberty identified service orders included in the calculation of the P-7 performance results that had a conversion duration of zero minutes. Liberty determined that the reason the Data Warehouse calculated and recorded a cutover duration of zero minutes for these orders was that the cutover start date and time and the cutover complete date and time were identical on the source record coming from the CUTS table in SNAPRADS. Because a coordinated hot cut conversion requires manual work on BellSouth's central office distribution frame, it is impossible for BellSouth to accomplish the coordinated conversion in zero minutes. BellSouth was unable to provide a concrete explanation of this problem, although it did indicate that the problem was likely the result of input errors when the record was created. There is no explicit exclusion of service orders with a cut-over duration of zero minutes in the rules for the P-7 measure in the BellSouth's SQM Plan; however, by including these orders in reported results, BellSouth could be reporting better average conversion intervals than it is actually achieving.

All hot cuts require physical work performed by BellSouth's technicians on the BellSouth central office distribution frame to accomplish the coordinated conversion. This physical work can never be performed in zero minutes. Indeed, it is possible that some of the zero-minute hot cut durations may be the result of data input errors by the central office technician. Liberty agrees with BellSouth that, because this is a benchmark measure, there is no impact on the P-7 equity determination of including zero-minute durations. Nevertheless, using a zero-minute duration for all hot cuts completed in less than a minute does artificially improve BellSouth's P-7 average interval results.

Response 29: BellSouth performed an analysis of the last 3 months (June through August '05) for the number of cutover durations of zero minutes included in the P-7 measure for Florida. Less than 1.5% of the cutovers included in this measure had zero minutes of duration, which occurs because the actual duration is so short until it is rounded to zero. An impact for these three months is as follows: In June, there were 36 of 1874 cutovers or 1.9%, 20 of 1501 or 1.3% in July and only 6 of 1168 or 0.51% in August. Liberty noted in its findings that the small frequency does not pose a parity problem.

In preparing for a "hot cut", BellSouth pre-wires all the connections necessary for the conversion. This includes not only the distributing frame connections within the central office but also any outside cable changes that must be made. At the time of the conversion, all that is necessary is to punch down the pair in literally seconds at the distributing frame along with any

outside cable changes and test in less than a minute. As stated in the definition for the P-7 measure, "this report measures the average time it takes BellSouth to disconnect an unbundled loop from the BellSouth switch and cross connect it to CLEC equipment." This measure does not include all of the time necessary to pre-wire the connections, only the time to change it from the BellSouth connection to a tie cable running to the CLEC's co-location point. The change will require system and coding changes for little, if any, improvement in accuracy; therefore, BellSouth believes the current procedure should be allowed to stand as is.

Accordingly, this Finding is considered resolved.

Finding 36: The SQM and SEEM levels of disaggregation as documented in BellSouth's SQM Plan were inaccurate and misleading for the UNE-P product for the P-3 (Percent Missed Initial Installation Appointments), P-4 (Average Completion Interval & Order Completion Interval Distribution) and P-9 (Percent Provisioning Troubles within 30 Days of Service Order Completion) measures. Classification: 4

The SQM and SEEM disaggregation rules for the P-3, P-4, and P-9 measures, as defined in BellSouth's SQM Plan, are identical for the UNE-P product. Therefore, based on the SQM Plan it appears that this product has the same product disaggregation requirements in both reporting systems. Liberty observed that BellSouth reports P-3, P-4, and P-9 results for UNE-P dispatch with a performance analog of retail residential and business dispatch for the SQM calculations. However, Liberty found that the UNE-P dispatch orders are dropped from the PARIS calculations of SEEM remedy payments. Indeed, Tables B-1 and B-2 of the SEEM indicate that the only disaggregation requirement for UNE-P orders in SEEM are non-dispatch/dispatch-in and non-dispatch/switch based orders.

Response 36: Response 36: This discrepancy resulted from the fact that the SQM and the SEEM Plans were separate documents being worked by two different work groups. The SQM was approved in December 2002 after 6 months of workshops with the FPSC Staff, CLECs and BellSouth (Order Number PSC-02-1736-PAA-TP dated 12/10/2002). The SEEM Administrative Plan continued to be discussed until April of 2003 (Order Number PSC-03-0529-PAA-TP) when the Performance Assessment Plan (PAP) was approved. The difference between the two plans was not discovered; therefore, the error was memorialized by the Order approving revisions in the plans.

The SQM and SEEM plans have been put into the same document by the new SQM and SEEM Plan stipulated by the parties to the docket in Florida (000121A-TP). The BellSouth staff has been consolidated on the coding side and will catch such discrepancies in future.

Using the July 1, 2003, version 3.0 of the Florida SQM as a guide, BellSouth created the SEEM submetrics that would be used to perform penalty calculations for the state of Florida. For the Percent Missed Installation Appointments –UNE Loop and Port Combos (PMIA-UNEPC) submetric, the disaggregations and corresponding retail analogs in the SQM are:

UNE Loop + Port Combinations.....Retail Residence and Business
- Dispatch In.....- Dispatched In
- Switch Based.....- Switch Based

Since there are specific sub-disaggregations listed, BellSouth interpreted the SEEM disaggregations to be Dispatch In and Switch Based, both of which represent non-dispatch situations from an operational standpoint. Since the SEEM calculations complied with the commission's Order, BellSouth does not plan to make any retroactive adjustments. BellSouth has installed an improved process and verified that this item will be handled correctly in the new SEEM. Accordingly, this finding is resolved

Finding 44: BellSouth included orders with invalid maintenance durations in the calculation of the M&R-3 (Maintenance Average Duration) measure. Classification: 2

The M&R-3 measure reports the average duration from the time BellSouth opens a trouble ticket to the time that BellSouth closes that ticket, after fixing the trouble and restoring service. To calculate the M&R-3 results, BellSouth extracts the time interval between the opening and closing (maintenance duration) of each trouble ticket directly from the source maintenance and repair systems, LMOS and WFA.

While examining BellSouth trouble ticket data for November and December 2003, Liberty noted a number of cases in which the trouble tickets had maintenance durations of zero minutes. For November 2003, there were 1,840 out of 142,352 tickets from LMOS that did not error out and that had zero maintenance durations. Furthermore, of these 1,840 trouble tickets, 122 were marked as dispatched. The characteristics of none of these troubles were such that they would be excluded according to the M&R-3 exclusion rules in the BellSouth's SQM Plan.

A legitimate interval between the opening and closing of trouble tickets should not be zero. This is particularly clear in the case of those troubles requiring a dispatch. When questioned about these zero maintenance duration intervals, BellSouth responded with two possible reasons as to why these trouble tickets had zero maintenance durations: i) the times were coded incorrectly in the legacy system by the technician and ii) the troubles were reported by the CLECs through the Trouble Analysis Facilitation Interface (TAFI) system, in which it is possible for there to be an apparent resolution of the problem before the ticket was opened, although the actual time interval is non-zero. Both of these explanations point to erroneous data in the source systems themselves. Although BellSouth's PMAP system generally accepts data derived from the source systems

without modification, it has an elaborate system of error checks that eliminates transactions with erroneous data fields from the measure calculations. Furthermore, in the case of some other time interval measures, BellSouth substitutes default values for derived time intervals that would otherwise equal zero. For example, for P-4, BellSouth substitutes a 0.33 day interval (8 hours) for any cases where PMAP calculates a zero duration on orders issued and worked on the same day (Zero Due Date Orders).

The Commission and the CLECs rely on the accuracy of BellSouth's measure calculations to assure accurate reporting and remedy payments. BellSouth's use of zero durations when the actual maintenance duration is non-zero biases both the calculated wholesale and retail maintenance average durations to be smaller than their actual values.

Response 44: BellSouth performed an analysis for the months of April, May and June '05 for the number of trouble tickets for both CLEC and BellSouth retail that had maintenance durations of zero minutes included in the M&R-3 measure for Florida. The results of the analysis are as follows:

Month	CLEC			BST		
	# of Zero	Total Reports	% of Total	# of Zero	Total Reports	% of Total
April '05	46	14,061	0.33%	1,461	945,296	0.15%
May '05	32	14,509	0.22%	1,572	917,277	0.17%
June '05	21	11,979	0.18%	1,623	1,180,754	0.14%
Total	99	40,549	0.24%	4,656	3,043,327	0.15%

There were less than 100 total trouble tickets for the CLECs during the entire three month period that had maintenance durations of zero minutes. This was only 0.24% of all total reports included in the 3-month total for this measure.

Further examination of the 122 troubles referred to in the finding above with a zero maintenance duration marked for dispatch reveals these tickets were all disposition code 381 which automatically generates a "dispatch" flag. However, there is no actual work done by a BellSouth technician. Disposition code 381 is for buried drop facilities where the customer has no problem with their telephone service but is reporting that the drop facility has not been properly buried. Trouble reports of this nature are closed with zero minutes of duration as there was no BellSouth technician dispatched and the issue is referred to a contractor to bury the drop wire. There is no customer trouble, either out of service or service affecting, on the line and therefore it is treated as "information" type reports as it relates to the maintenance duration.

Liberty questioned the potential for any trouble report to have zero maintenance duration. First, as explained above, any ticket that does not require any action by BellSouth is shown with zero duration. Also, as included in the initial response from BellSouth above, the Trouble Analysis Facilitation Interface (TAFI) system, which is used by both CLECs and

BellSouth to enter troubles, tests the trouble prior to creating the trouble report to determine if it is a valid trouble. A small percentage of these troubles are software problems and the TAFI system will correct the problem, if possible, at the time of the test. These troubles will have zero duration and are "legitimate" trouble reports. However, there is no time expended by any BellSouth personnel after the test is completed. The definition for the M&R-3 measure states "the average duration of Customer Trouble Reports from the receipt of the Customer Trouble Report to the time the trouble report is cleared. Since the report is created and cleared at the same time, zero duration is correct. Both CLEC and BellSouth data are treated the same. As shown above, with less than 100 reports for the entire 3-month period, the impact is diminimus. Adding an arbitrary number of seconds or minutes to each ticket with zero duration would not make the data any more accurate. Also, these tickets are included in the Customer Trouble Report Rate (M&R-2) and Repeat Report Rate (M&R-4) submetrics.

Accordingly, this Finding is considered resolved.

Finding 47: BellSouth's manual process for preparing billing data for the B-1 (Invoice Accuracy) measure did not contain adequate quality control procedures. Classification: 3

During its review of the process BellSouth uses to prepare data for the B-1 measure, Liberty examined working spreadsheets provided by BellSouth that contain the output of the mechanized procedures as well as the Billing Group analyst's revisions and exclusions to these data for the December 2003 reporting month. With the exception of the total number of adjustments, Liberty was able to reconcile these working spreadsheets with the data in the final Billing Group spreadsheet that goes into RADS. Liberty found that the number of total adjustments in the working spreadsheets was two greater than the number of total adjustments in the final spreadsheets.

BellSouth indicated that it had introduced an error in the number of adjustments for one billing account (although the dollar amount was correct) when preparing the final spreadsheets and confirmed that the number of adjustments on the final spreadsheets was incorrect and that invoice accuracy measured in number of adjustments, reported as a diagnostic, should decrease from 67.91 percent, as reported, to 67.11 percent. The result for invoice accuracy in terms of dollars is not affected.

BellSouth should expand its process for preparing the billing data that it sends to RADS to include quality control for its manual processing steps. BellSouth informed Liberty that it recently revised the work flow for the manual review process to include additional review and controls procedures, and that it updated the job aids used by the Billing Group analyst to reflect these changes. BellSouth noted that its recently revised work flow should minimize inaccuracies and improve quality control, and that it continues to review the process with an objective of reducing as many manual steps as possible.

Response 47: BST has conducted the recommended study of the manual processes by performing a risk and control analysis of the Invoice Accuracy process. In this evaluation of the Invoice Accuracy processes, \$1.9 billion of BST revenue was validated of which \$117.4M was CLEC revenue. The results of the study indicated that the addition of a monthly review and approval step would ensure a well controlled process. This review and approval process will be implemented with the August 2005 data month. This will resolve this finding.

Finding 49: BellSouth's methods for defining revenues and determine which bills are included in the B-1 (Invoice Accuracy) measure are not addressed by the SQM Plan. Classification: 4

The SQM Plan does not specify how BellSouth should define revenues, or whether certain types of bills should be included or excluded from the measure. BellSouth has adopted certain conventions, of which the Commission or CLECs may be unaware, for defining which revenues and bills it includes in the B-1 measure. For example, BellSouth excludes collocation revenues and adjustments associated with construction, space, and electricity (known as "CO1 accounts") bills. BellSouth stated that, because it bills CLECs based on estimates and later issues adjustments to correct the shortfall or overage, such data are not reflective of true invoice accuracy performance and should be excluded. BellSouth does, however, include other types of collocation account revenues and adjustments in the measure. BellSouth also defines revenues slightly differently for CABS bills than it does for CRIS and IBS bills. BellSouth includes federal, state, and local taxes in its revenue data from CABS, but includes only federal and state taxes in its FDB (CRIS and IBS) revenue data.

The lack of documentation for BellSouth's conventions for defining revenues and bills could lead to confusion by the Commission and CLECs about what is and is not included in the measure. Additional language for the SQM Plan that makes these conventions explicit could reduce the potential for such confusion. BellSouth stated that it continues to have discussions with CLECs and Commissions regarding the methods of defining this measure. BellSouth also added some additional descriptions language to its job aids regarding the types of charges included and excluded from the measure.

Response 49: BST revenue was validated of which \$117.4M was CLEC revenue. The results of the study indicated that the addition of a monthly review and approval step would ensure a well controlled process. This review and approval process will be implemented with the August 2005 data month. A document titled "Definitions of Account Logic for Invoice Accuracy" will be posted to the PMAP Web Site beginning October 15, 2005 that will provide specific information concerning this process. This will resolve this finding.