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Nancy H. Sims  
Director - Regulatory Relations

RECORDS AND  
REPORTING

December 23, 1999

Blanco Bayo  
Director of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32302

RE: Docket 981834-TP – Petition of competitive carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory

Dear Ms. Bayo,

On December 17, 1999, BellSouth, KPMG, members of the Florida PSC Staff and several ALECs met in Tallahassee to discuss the Interim Performance Metrics proposed by KPMG to be applicable for Third Party OSS Testing. Attached are several documents that respond to items requested at the workshop. The attachments include the following.

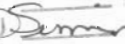


1. Comments to the detailed discussion of the SQM
2. Response to the request for more granularity in the retail analogs for UNEs
3. Response to the statistical discussion of choosing delta and a benchmark.

If you have any further questions, please do not hesitate to call me.

Yours truly,



Director – Regulatory Relations

AFA	_____
APP	_____
CAF	_____
CMU	_____ 
CTR	_____
EAG	_____
LEG	_____ 
MAS	_____
OPC	_____
RRR	_____
SEC	_____ 
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**BellSouth's General Comments Regarding Performance Measurements**

1. BellSouth is in general agreement with the interim measurements proposed by KPMG.
2. BellSouth has concerns about the proposal to move the point at which the time stamp is acquired for use in the PMAP data. Additional comments are below.
3. BellSouth also has a concern about several of the benchmarks. In these instances, the benchmarks would appear to be somewhat arbitrary and would be difficult to achieve. Parity is the goal. UNEs, of course, do not have a direct analog, however, the benchmark or "surrogate analog" selected must approximate some retail service. In any case, the benchmark should reflect what the "current process" is capable of producing. We will offer alternatives for consideration.
4. Additionally, it should be understood that each measurement's objective, whether based on parity, historical data or a surrogate retail analog, represents an average for a mix of LSR and order types. The specific result for an individual LSR or order may vary above or below the objective.
5. Measurements and benchmarks will have application limited to the Third Party OSS Test only. The Generic Performance Measurements Docket will address the Performance Measurements applicable to normal business in Florida.

**Pre-Ordering OSS – Average OSS Response Time and Response Interval**

1. KPMG's proposal suggests that the point of time stamp application be moved towards the ALEC's side of the interface. BellSouth's position is that: 1) the system and programming work required to move the acquisition of the time stamp is difficult to accomplish in a short period of time. In some cases, the time stamp does not exist in the legacy system and will require legacy system upgrades before it could be measured. 2) The time interval difference is comparatively insignificant and would not result in increased ability to detect non-discriminatory access.

However, BellSouth recognizes that this is an issue for an independent evaluation. It is the opinion of BellSouth that KPMG can perform tests to determine if there is a significant time difference.

2. KPMG proposes a benchmark of parity plus a factor "x." BellSouth will agree with that proposal, provided that the benchmark, and the "x" factor recognize differences among the systems, the CPNI security restrictions and the architecture.

**Pre-Ordering OSS – OSS Interface Availability**

1. Benchmark of 99% is very stringent but is acceptable to BellSouth.

## Ordering – Percent Flow Through (Summary) and (Detail)

1. Flow through benchmark of 98% has never been achieved. As an alternative, BellSouth suggests a measure of parity for resale: Retail RNS (Residence), historical result compared to Resale Residence and Retail ROS (Business) compared to Resale Business. ROS is a new system and it may be necessary to develop the parity standard for Business as the test progresses. The Flow Through results, previously combined, has recently been separated into Resale Residence, Resale Business and UNE. For the test, the UNE flow thorough objective should be developed based on the disaggregated UNE Flow Through results. The Flow Through rate for specials, design or other complex services should be the same percent it is for BellSouth's retail units (0%). BellSouth has not found it cost effective to automate these types of orders. KPMG, of course, will verify this statement as a part of the audit.

## Percent Rejected Service Requests

1. BellSouth understands that the test will involve LSRs, purposely submitted with errors. As a result this measurement is completely within the control of the test manger. Accordingly, BellSouth agrees with the recommendation that this measurement be a diagnostic.

## Reject Interval

1. BellSouth has a concern with the proposal to move the point at which the time stamp is applied. See comments above under Pre-Ordering OSS – Average OSS Response Time and Response Interval. An additional test is possible with this measurement as a comparison can be made between the test manger's recorded observations and the raw data supplied by BellSouth.
2. The proposed benchmarks should be based on historical data or BellSouth's surrogate retail analogs, which are under development.

## Firm Order Confirmation Timeliness

1. BellSouth has a concern with the proposal to move the point at which the time stamp is applied. See comments above under Pre-Ordering OSS – Average OSS Response Time and Response Interval. An additional test is possible with this measurement as a comparison can be made between the test manger's recorded observations and the raw data supplied by BellSouth.
2. The proposed benchmarks should be based on historical data or BellSouth's surrogate retail analogs, which are under development.

## Speed of Answer in Ordering Center

1. Proposal is acceptable.

#### Mean Held Order Interval and Distribution Intervals

1. The proposed benchmarks for UNEs should be based on historical data or BellSouth's surrogate retail analogs, which are under development. See attachment.

#### Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices

1. The proposed benchmark is for the time of service order issuance to jeopardy notification. This is inconsistent with the SQM formula and the method currently used to measure jeopardy interval. BellSouth believes the appropriate interval is due date minus jeopardy notice.
2. Resale Residence, Resale Business and UNE Platform have direct retail analogs, provided the UNE Platform is compared to a similar retail offering. UNE benchmarks can be derived from historical data or from surrogate retail analogs, which are under development. See attachment.

#### Percent Missed Installation Appointments

1. Resale Residence, Resale Business and UNE Platform have direct retail analogs, provided the UNE Platform is compared to a similar retail offering.
2. UNE benchmarks should be based on the FOC date, not on the time in the interval guide. These benchmarks can be derived from historical data or from surrogate retail analogs, which are under development.

#### Average Completion Interval and Order Completion Interval Distribution

1. Under Business Rules, KPMG has changed the wording to measure elapsed time from when the order is received by BST. If 'order' refers to Service Order, which is issued upon receipt of a valid LSR, this wording is acceptable since it does not change the method for the time calculation. However, if 'order' refers to the receipt of an LSR, BellSouth has the same concerns (and recommended tests) discussed under Reject Interval and FOC Timeliness.
2. Resale Residence, Resale Business and UNE Platform have direct retail analogs, provided the UNE Platform is compared to a similar retail offering.
3. UNE benchmarks should be based on the FOC date, not on the time in the interval guide. These benchmarks can be derived from historical data or from surrogate retail analogs, which are under development.

### Average Completion Notice Interval

1. Resale Residence, Resale Business and UNE Platform have direct retail analogs, provided the UNE Platform is compared to a similar retail offering.
2. UNE benchmarks should be based on the time of completion. There is not a metric for Completion Notice in the Interval Guide. Benchmarks can be derived from historical data or from surrogate retail analogs, which are under development.
3. We should keep in mind that BellSouth technicians also notify the customer of order completion.

### Coordinated Customer Conversions

1. Benchmark should be 95% within 15 minutes for each circuit.

### Percent Provisioning Troubles within 30 days of Service Order Activity

1. Resale Residence, Resale Business and UNE Platform have direct retail analogs, provided the UNE Platform is compared to a similar retail offering.
3. UNE benchmarks should be based on the time of completion. There is not a metric for Completion Notice in the Interval Guide. Benchmarks can be derived from historical data or from surrogate retail analogs, which are under development. See attachment.
2. During the test, it is assumed that the Test Manager will submit a relatively large volume of troubles. Therefore, for the purposes of this test, this measurement should be a diagnostic.

### Total Service Order Cycle Time

1. Resale Residence, Resale Business and UNE Platform have direct retail analogs, provided the UNE Platform is compared to a similar retail offering.
2. UNE benchmarks should be based on the FOC date, not on the time in the interval guide. These benchmarks can be derived from historical data or from surrogate retail analogs, which are under development.

### Missed Repair Appointments

Customer Trouble Report Rate  
Maintenance Average Duration  
Percent Repeat Troubles within 30 Days  
Out of Service > 24 hours

1. Resale Residence, Resale Business and UNE Platform have direct retail analogs, provided the UNE Platform is compared to a similar retail offering.
2. UNE benchmarks should be based on the FOC date, not on the time in the interval guide. These benchmarks can be derived from historical data or from surrogate retail analogs, which are under development.
3. UNE Other should not be compared to BST PBX, Centrex or ISDN retail.

OSS Interface Availability

1. Benchmark should be 99% - 99.5% availability

OSS Response Interval and Percentages

1. Benchmark should be Parity.
2. BellSouth will consider a proposal by KPMG to define the response intervals for a particular family of transactions rather than the present system to system response intervals.
3. A benchmark for ECTA should be developed as the test proceeds.

Average Answer Time – Repair Centers

1. Benchmark should be parity with BST retail centers.

Invoice Accuracy

Mean Time to Deliver Invoices

Usage Data Delivery Accuracy

Usage Data Delivery Completeness

Usage Data Delivery Timeliness

Mean time to Deliver Usage

Speed to Answer Performance/Average Speed to Answer – Toll

Speed to Answer Performance/Percent Answered within “X” Seconds – Toll

Speed to Answer Performance/Average Speed to Answer – DA

Speed to Answer Performance/Percent Answered within “X” Seconds – DA

E911 Timeliness

E911 Accuracy

E911 Mean Interval  
Trunk Group Service Report  
Trunk Group Service Detail

1. BellSouth concurs in recommendations for these measurements.

Collocation / Average Response Time  
Collocation / Average Arrangement Time  
Collocation / Percent of Due Dates Missed

1. BellSouth has significant concerns about the proposed benchmarks and the inclusion of Permit Interval in the overall Arrangement Time. Permit Interval is particularly significant in any building construction in Florida.
2. The Florida PSC has a proceeding underway to address the Permit Interval and to establish benchmarks. BellSouth recommends awaiting the decision of the Commission on these issues.

**FPSC 3<sup>rd</sup> Party Audit Workshop  
Retail Analogs, Benchmarks  
12/22/99**

Category	Measurement	BST Benchmark or Analog	BST Benchmark or Analog Proposal	Comments
Pre-Ordering - OSS	1. Average OSS Response Time	<u>Benchmark Systems:</u> TAG Ordering Chain = RSAG TN, RSAG ADD, DSAP, ATLAS, CRSECSR, CRSEINIT	<u>LENS &amp; TAG</u> 95% within 6.3 sec or Parity + X	
	1a. Response Interval	LENS Ordering Chain = HAL/CRIS, RSAG TN, RSAG ADD, DSAP, ATLAS, COFFI/USOC, PSIM/ORB  <u>Parity by Design Systems:</u> ATLAS/COFFI, RSAG TN, RSAG ADD, DSAP	<u>Benchmark Systems</u> HAL/CRIS: 95% w/in 7.02 sec; COFFI/USOC: 95% w/in 0.59 sec, PSIM/ORB: 95% w/in 3.94 sec Or Parity + X  <u>Parity by Design Systems:</u> ATLAS/COFFI RSAG ADD: RSAG TN: DSAP	
	2. OSS Interface Availability	<u>Benchmark Systems:</u> LENS, LEO MAINFRAME, LEO UNIX, LESOG, EDI, HAL, TAG, BESOG  <u>Parity By Design Systems:</u> SOCS (?), BOCRIS, ATLAS/COFFI, RSAG TN, RSAG ADD, DSAP	99% of scheduled availability  Parity by Design Systems	
Ordering	1. Percent Flow-through Service Requests	Benchmark  Audit Verification	96% Res (simple) 80% Bus (simple) 80% UNE	
	2. Percent Rejected Service Requests	Benchmark for Resale* & UNEs	<u>% Rejected</u> Resale Non Mech: 7% UNE Non Mech: 3% Resale Mech: 12% UNE Mech: 10%	
	3. Reject Interval	Benchmark for Resale* & UNEs  * Retail Analog under development	<u>95%&lt;=Rejected Interval</u> Resale Non Mech: 12 hr UNE Non Mech: 12 hr Resale Mech: 4hr UNE Mech: 4 hr	
	4. Firm Order Confirmation Timeliness	Benchmark for UNE's and Resale Services  Retail Analog for Resale Services is under development	95%<= Non Mech: 48 hrs 95%<= Mech: 4 hrs	
	5. Speed of Answer in Ordering Center	Benchmark for LCSC & UNE Center	Retail Analog	



**FPSC 3<sup>rd</sup> Party Audit Workshop  
Retail Analogs, Benchmarks  
12/22/99**

Category	Measurement	BST Benchmark or Analog	BST Benchmark or Analog Proposal	Comments
Provisioning	1. Mean Held Order Interval 1a. Distribution Intervals	Retail Analog for Resale Services  Retail Analog for UNE Loops = Retail POTs Disp + X	Retail POTs Disp + X	
	2. Average Jeopardy Notice Interval  2a. Percentage of Orders Given Jeopardy Notices	Benchmark (Resale and UNEs)  Benchmark (Resale and UNEs) Retail Analog is under development	Mechanically submitted 95% <= 24hrs  95% <= 5%	
	3. Percent Missed Installation Appointments	Retail Analog for Resale Services  Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp + X	
	3. Average Completion Interval  4a. Order Completion Interval Distribution	Retail Analog for Resale Services: Retail Analog for UNE Loops = Retail POTs + X  Retail Analog for Resale Services: Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp + X  Retail POTs Disp + X	
	5. Average Completion Notice Interval	Benchmark for Resale and UNEs	Mechanically submitted: 95%<=4 hr	
	6. Coordinated Customer Conversions	Benchmark for UNE's (Measure only applies to UNE's)	95% within 15 minutes	
	7. Percent Provisioning Troubles w/i 30 days	Retail Analog for Resale  Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp + X	
	8. Total Service Order Cycle Time	Retail Analog for Resale  Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp + X	
	Maintenance & Repair	1. Missed Repair Appointments	Retail Analog for Resale Retail Analog for UNE Loops = Retail POTs + X	Retail Bus Disp + X
2. Customer Trouble Report Rate		Retail Analog for Resale Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp + X	
3. Maintenance Average Duration		Retail Analog for Resale Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp	

**FPSC 3<sup>rd</sup> Party Audit Workshop  
Retail Analogs, Benchmarks  
12/22/99**

Category	Measurement	BST Benchmark or Analog	BST Benchmark or Analog Proposal	Comments
	4. Percent Repeat Troubles w/i 30 days)	Retail Analog for Resale Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp + X	
	5. Out of Service > 24 Hours	Retail Analog for Resale Retail Analog for UNE Loops = Retail POTs + X	Retail POTs Disp + X	
	6. OSS Interface Availability	Retail Analog for BST TAFI & CLEC TAFI  Parity by Design for LMOS, MARCH, SOCS  Benchmark for ECTA	Retail Analog  Parity by Design  ECTA = 99% of scheduled availability	
	7. OSS Response Interval and Percentages	Front End Systems - Retail BST TAFI & CLEC TAFI  Backend Systems - Parity by Design: CRIS, DLETH, DLR, OSPCM, LMOS, LMOSUP, MARCH PREDICTOR, SOCS, LNP)	Retail Analog  Parity by Design	
	8. Average Answer Time - Repair Centers	Retail Analog (Weighted Average BST Res. & Bus. Repair Centers to CLEC UNE and Resale Maintenance Center)	Retail Analog	
Billing	1. Invoice Accuracy	Retail Analog	Retail Analog	Not Applicable
	2. Mean Time to Deliver Invoices	Retail Analog	Retail Analog	Not Applicable
	3. Usage Data Delivery Accuracy	Retail Analog	Retail Analog	Not Applicable
	4. Usage Data Delivery Completeness	Retail Analog	Retail Analog	Not Applicable
	5. Usage Data Delivery Timeliness	Retail Analog	Retail Analog	Not Applicable
	6. Mean Time to Deliver Usage	Retail Analog	Retail Analog	Not Applicable
Operator Services (Toll) and Directory Assistance	1. Average Speed to Answer (Toll)	Parity by Design	Parity by Design	Not Applicable
	2. Percent Answered within "X" Seconds (Toll)	Parity by Design	Parity by Design	Not Applicable
	3. Average Speed to Answer (DA)	Parity by Design	Parity by Design	Not Applicable
	4. Percent Answered within "X" Seconds (DA)	Parity by Design	Parity by Design	Not Applicable
E911	1. Timeliness	Parity by Design	Parity by Design	Not Applicable
	2. Accuracy	Parity by Design	Parity by Design	Not Applicable

**FPSC 3<sup>rd</sup> Party Audit Workshop  
Retail Analogs, Benchmarks  
12/22/99**

Category	Measurement	BST Benchmark or Analog	BST Benchmark or Analog Proposal	Comments
	3. Mean Interval	Parity by Design	Parity by Design	Not Applicable
Trunk Group Performance	1. Trunk Blockage	Benchmark	Any 2 hr period in 24 hrs where CLEC blockage exceeds BST blockage by more than 0.5% constitutes a miss. This applies to Trunk Group Types 1, 3, 4, 5, 10, 16 for CLEC's and types 9 for BST	
Collocation	1. Average Response Time	Benchmark	Resp Time on bona fide application: 30 days – physical; 20 days – virtual	Negotiated Contracts
	2. Average Arrangement Time	Benchmark	Physical <sup>1</sup> : 90 bus days (ordinary) 130 bus days (extraordinary) Virtual <sup>1</sup> : 50 bus days (ordinary) 75 bus days (extraordinary)  Note 1: Interval may be longer if mutually agreed to by both parties	Negotiated Contracts
	3. % of Due Dates Missed	Benchmark	<= 10%	Not Applicable

**FPSC 3<sup>rd</sup> Party Audit Workshop**  
**BellSouth Response to 12/17/99**  
**Statistical Analysis**

**Materiality - The "Delta" in the Alternative Hypothesis**

Materiality standards should be based on two key items, the Customer and Operational mandates. For the customer, one must understand at what point would the customer make a different decision based on the level of service he is provided. Operationally, even at optimal performance, there are certain limits to which the business can be managed. This 'manage to' perspective speaks to process capabilities, where performance cannot be managed in 1% increments.

These are business decisions requiring an in-depth knowledge of the business and the processes being used by BellSouth and the ALECs. Choosing the "delta" must incorporate all these thought processes.

**Benchmarks – Deterministic or Probability**

When a benchmark is used, statistical testing can be done using a probability model, or non-statistical testing can be done using a deterministic model. Either model is a tool to help the decision-maker determine whether or not service parity has been provided.

One example is a benchmark in the form of "95% within 4 hours". If CLEC-1 performance results were '94.7%' within 4 hours the decision-maker would have to determine if this level of service was "equal" or "discriminatory". Using a deterministic model, one would conclude failure, where 94.7% is less than 95%. However, using a probability model (statistical testing) one would ask the question, "Is the 0.3% gap (95% - 94.7%) significant?" This question would be answered via statistical testing.

Stated another way, for a Missed Appointments measure, a benchmark using a deterministic model might need to be 10%. Whereas, benchmarks (for this same measurement) using a probability model, may be 7%.

The model used should be based on the individual measure.