

Robert A. Culpepper  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0841

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

**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:

Adam Teitzman  
Jerry Hallenstein  
Lisa Harvey  
David Rich  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6175  
Fax. No. (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[jhallens@psc.state.fl.us](mailto:jhallens@psc.state.fl.us)  
[lsharvey@psc.state.fl.us](mailto:lsharvey@psc.state.fl.us)  
[drich@psc.state.fl.us](mailto:drich@psc.state.fl.us)

Tracy W. Hatch  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
Fax. No. (850) 425-6361  
[thatch@att.com](mailto:thatch@att.com)

Sonia Daniels  
AT&T  
1230 Peachtree Street  
Suite 400  
Atlanta, GA 30309  
Tel. No. (404) 810-8488  
Fax. No. (281) 664-9791  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

Verizon, Inc.  
Kimberly Caswell  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Tel. No. (813) 483-2617  
Fax. No. (813) 223-4888  
[kimberly.caswell@verizon.com](mailto:kimberly.caswell@verizon.com)

Nanette Edwards (+)  
Regulatory Attorney  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Peter M. Dunbar, Esquire  
Karen M. Camechis, Esquire  
Pennington, Moore, Wilkinson,  
Bell & Dunbar, P.A.  
Post Office Box 10095 (32302)  
215 South Monroe Street, 2nd Floor  
Tallahassee, FL 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
[pete@penningtonlawfirm.com](mailto:pete@penningtonlawfirm.com)

Brian Chaiken  
Supra Telecommunications and  
Information Systems, Inc.  
2620 S. W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4248  
Fax. No. (305) 443-1078  
[bchaiken@stis.com](mailto:bchaiken@stis.com)

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Susan Masterton  
Charles J. Rehwinkel  
Sprint  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, Florida 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Donna Canzano McNulty (+)  
MCI  
1203 Governors Square Blvd.  
Suite 201  
Tallahassee, FL 32301  
Tel. No. (850) 219-1008  
[donna.mcnulty@mci.com](mailto:donna.mcnulty@mci.com)

Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5493  
Fax. No. (770) 284-5488  
[brian.sulmonetti@wcom.com](mailto:brian.sulmonetti@wcom.com)

William Weber, Senior Counsel  
Gene Watkins (+)  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor, Promenade II  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (508) 300-7749  
[wweber@covad.com](mailto:wweber@covad.com)  
[jbelle@covad.com](mailto:jbelle@covad.com)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

John Rubino  
George S. Ford  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, Florida 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
[gford@z-tel.com](mailto:gford@z-tel.com)

Vicki Gordon Kaufman  
Moyle Flanigan Katz Raymond  
& Sheehan, PA  
118 North Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
[vkaufman@moylelaw.com](mailto:vkaufman@moylelaw.com)  
Represents KMC Telecom  
Represents Covad  
Represents Mpower

Jonathan E. Canis  
Kelley Drye & Warren, LLP  
1200 19th Street, N.W., Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792  
[jcanis@kelleydrye.com](mailto:jcanis@kelleydrye.com)

Tad J. (T.J.) Sauder  
Manager, ILEC Performance Data  
Birch Telecom of the South, Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108  
Tel. No. (816) 300-3202  
Fax. No. (816) 300-3350

John D. McLaughlin, Jr.  
KMC Telecom  
1755 North Brown Road  
Lawrence, Georgia 30043  
Tel. No. (678) 985-6262  
Fax. No. (678) 985-6213  
[jmclau@kmctelecom.com](mailto:jmclau@kmctelecom.com)

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335-8349  
Tel. No. (253) 851-6700  
Fax. No. (253) 851-6474  
[aisar@millerisar.com](mailto:aisar@millerisar.com)

Renee Terry, Esq.  
e.spire Communications, Inc.  
7125 Columbia Gateway Drive  
Suite 200  
Columbia, MD 21046  
Tel. No. (301) 361-4298  
Fax. No. (301) 361-4277

Mr. David Woodsmall  
Mpower Communications, Corp.  
175 Sully's Trail  
Suite 300  
Pittsford, NY 14534-4558  
Tel. No. (585) 218-8796  
Fax. No. (585) 218-0635  
[dwoodsmall@mpower.com](mailto:dwoodsmall@mpower.com)

Suzanne F. Summerlin, Esq.  
Attorney At Law  
2536 Capital Medical Blvd.  
Tallahassee, FL 32308-4424  
Tel. No. (850) 656-2288  
Fax. No. (850) 656-5589  
[summerlin@nettally.com](mailto:summerlin@nettally.com)  
[sbharvey@suzannesummerlinattorney.com](mailto:sbharvey@suzannesummerlinattorney.com)

Dulaney O'Roark III (+)  
WorldCom, Inc.  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
[De.OROark@mci.com](mailto:De.OROark@mci.com)

Ann Shelfer  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 220  
Tallahassee, FL 32301  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[ashelfer@stis.com](mailto:ashelfer@stis.com)

Matthew Feil  
FDN Communications  
2301 Lucien Way, Suite 200  
Maitland, FL 32751  
Tel. No. (407) 835-0460  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)

Bill L. Bryant, Jr.  
Akerman Senterfitt  
106 East College Avenue  
Suite 1200  
Tallahassee, FL 32301  
Tel. No. (850) 224-9634  
[Bill.Bryant@akerman.com](mailto:Bill.Bryant@akerman.com)



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  
Item 1  
Page 1 of 1

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.  
FPSC Dkt. No. 00121A-TP  
Responses to 8/24/05 Request -  
May and June 2005 SEEM  
Adjustments  
September 8, 2005  
Item 2  
Page 1 of 1

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  
BST Response to Staff Request  
August 24, 2005  
Item No. 2

**PUBLIC DISCLOSURE DOCUMENT**  
**(entire document redacted)**



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.  
FPSC Dkt. No. 00121A-TP  
Responses to 8/24/05 Request -  
May and June 2005 SEEM  
Adjustments  
September 8, 2005  
Item 5  
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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  
August 24, 2005  
Item No. 5

**PUBLIC DISCLOSURE DOCUMENT**  
**(entire document redacted)**

**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  
August 24, 2005  
Item No. 6

**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\_fct to the so\_ticket\_rel needed to change: service\_order\_fct 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.  
FPSC Dkt. No. 00121A-TP  
Responses to 8/24/05 Request -  
May and June 2005 SEEM  
Adjustments  
September 8, 2005  
Item 8  
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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  
August 24, 2005  
Item No. 8

**PUBLIC DISCLOSURE DOCUMENT**  
**(entire document redacted)**

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.