BELLSOUTH

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May 10, 2002

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Comments in the above-referenced matter regarding proposed business rules. Copies are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH/jej

Enclosure

446456

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In Re: *Docket to Establish Generic Performance Measures, Benchmarks, and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*

Docket No. 01-00193

COMMENTS OF BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Telecommunications, Inc., ("BellSouth") hereby files its Comments, pursuant to the notice issued by the Tennessee Regulatory Authority ("TRA" or "Authority") on May 7, 2002 and states the following:

1. On April 16, 2002, during its oral deliberations in this proceeding, the Authority stated that parties should submit within 10 days: (1) business rules for the adopted measurement, Percent of Timely Loop Modification/De-Conditioning on xDSL Loops; (2) language for inclusion in the business rules to clarify the statistically valid sampling technique to be used for the adopted measurement, Service Order Accuracy. On April 26, 2002 the CLEC Coalition filed its proposed language for the business rules, along with supporting comments. On April 29, 2002 BellSouth filed its proposed business rule language, and also filed a request that it be allowed to file comments or, alternatively, that the CLECs comments be stricken. On May 7, 2002, the Authority issued the above-identified Notice, which stated that parties may file comments in support of their respective proposed business rules by Friday, May 10, 2002. BellSouth hereby responds to that Notice with this filing.

TN-P-14: Set of Timely Loop Modifications/De-Conditioning on xDSL Loops

2. The proposed business rules filed by BellSouth and the CLEC Coalition for this measurement both define the interval to which the measurement applies. BellSouth and the CLEC Coalition have proposed (albeit with somewhat different wording) the same end-point for

this measurement: the time at which the BellSouth technician completes the loop modification/conditioning. BellSouth and the CLECs, however, have proposed different points in the process for the measured interval to begin. BellSouth proposes that the interval would be measured from the time BellSouth issues a SOCS date time stamp for the order. The CLECs propose that the interval begin at the time that the CLEC submits a complete and accurate Local Service Request ("LSR") to BellSouth. Thus, BellSouth has proposed a measurement that addresses the time it takes to complete (that is, to provision) the loop-modification/conditioning. The CLECs have proposed an interval that includes both the time for provisioning and for order processing.

3. To support the interval they propose, the CLECs state that the interval is consistent with the decision of the TRA that the interval for the Order Completion Interval measurement (TN - P7) should begin when an LSR is submitted (Comments of CLEC Coalition, p. 3). The problem with this rationale is that utilizing the same interval for the subject measurement and for the OCI Measurement renders the two almost identical. In contrast, BellSouth drafted its proposed business rule based on the assumption that the Authority did not intend to define the subject loop modification measurement so that it essentially duplicates measurement P-7.

4. While BellSouth has no objection to measuring the loop modification interval to include the time for both ordering and provisioning, this interval should not be addressed in a separate measurement that duplicates another measure. Therefore, if it is the Authority's intention to measure both the ordering and provisioning interval for the loop modification function, BellSouth submits that the better alternative is to do so by including the measurement

of this interval within the measurement of P-7, Order Completion Interval. This can be done by simply adding to the product disaggregation indicated for measurements P6 and P7.

5. The document handed out during the Authority's deliberations of April 19, 2002 listed four categories of product level disaggregation for measurement P-14: (1) two-wire DSL, (2) four-wire DSL, (3) line sharing, and (4) line splitting. Measures P-6 and P-7 have these same disaggregated sub measures, which are designated on the Handout as numbers 24 (unbundled two-wire xDSL loop), 25 (unbundled four-wire xDSL loop), 33 (line sharing/high frequency spectrum UNE), and 34 (line splitting/high frequency UNE). The only difference is that the proposed measurement P-14 reflects the interval to provide DSL loops that require conditioning, while measurements P6 and P7 relate to loops that do not require conditioning. Otherwise, measurement P-14 (as defined by the CLEC's proposed business rule) precisely duplicates P-6 and P-7.

6. Therefore, if the sub-metrics identified in the Handout as numbers 24 and 25 were further disaggregated to reflect both loops that require conditioning and the provisioning of loops without conditioning, then measurements P-6, P-7 would capture exactly the same interval as the proposed measure P-14. Under this approach, there would be sub-metrics for the unbundled two-wire xDSL loop (conditioned), unbundled two-wire xDSL loop (without conditioning), unbundled four-wire xDSL loop (conditioned), and unbundled four-wire xDSL loop (without conditioning). Measurement P-14 would then be deleted. This approach will measure precisely the same interval as would the CLECs' proposed business rule, but will do so in a much simpler and more efficient manner. Moreover, this approach has been adopted by the Florida Public Service Commission (Docket No. 000121-TP, *Order Approving BellSouth Performance*

Assessment Plan, Order No. PSC-02-0187-FOF-TP, Attachment A, p78), and has also been proposed in the Georgia performance measurement proceeding (Docket 7892-U).

Service Order Accuracy Sampling Process

7. The fundamental difference between the sampling process proposed by BellSouth and the proposal of the CLECs is that BellSouth has proposed a sampling technique that is not only usable, but that is in fact being used by BellSouth in the plans implemented throughout its region. In contrast, the CLECs have not really proposed a technique at all, but only a formula that, theoretically, would produce a technique if appropriate values were input into the formula.

8. Under the process submitted by BellSouth, there are four steps to derive a statistically valid sample: (1) A list of all orders completed in the report month is generated. (2) The orders are broken down by the disaggregation specified in the SQM. (3) For each disaggregated sub-measure, the number of completed orders and the error rates from previous months are used for scenario testing to determine the number of orders that have to be reviewed to achieve a confidence level of +/- 5% for each sub metric. (4) Once the sample size is determined, the appropriate number of orders are extracted for review. Again, this process is not only usable, but it has been used by BellSouth in each state in which a measurement plan has been adopted and implemented throughout the region.

9. In contrast, the CLEC Coalition offers only a formula that ostensibly could be used if the formula were filled in. The formula is $n=t^2$. The CLECs' Comments also contain a somewhat long, but relatively basic, explanation of the formula. There are, however, no proposed values for the CLEC-proposed formula. Thus, standing alone, the formula submitted by the CLECs could not be utilized in any functional way. Given this, BellSouth's concrete proposal should be adopted, rather than the theoretical proposal of the CLECs.

10. As noted above, the sampling process advocated by BellSouth is being used throughout the region. Further, the ordering processes used by Bellsouth are regional and, therefore, the sampling process used should also be regional, i.e., there is no reason for a statistical methodology applied to a regional system to vary from state to state. At the same time, the Louisiana Public Service Commission is currently conducting a six month review of the previously ordered plan. As part of this review, statisticians for the parties are meeting to discuss statistical issues on May 22, 2002. BellSouth does not know if the CLECs object to the statistical method that BellSouth has proposed in the proceeding now before the Authority (and that is being used in other states). However, if the CLECs do object, the meeting scheduled as part of the process in Louisiana presents an appropriate opportunity to discuss any objection. Thus, as an alternative to approving BellSouth's proposal, the Authority could direct the parties to utilize the already scheduled meetings (or even future meetings) between statisticians for the parties to attempt to resolve any differences that may exist.

11. Finally, BellSouth would also note that in the language it originally proposed, BellSouth erroneously referred to the sampling technique as "stratified". This is not accurate. If a stratified technique were utilized, the process would involve finding an overall answer by sampling each of the 24 disaggregated sub-metrics, then combining them into a single reported number. To the contrary, under the technique utilized by BellSouth --- which was accurately described in the business rule language previously submitted by BellSouth --- there is a separate number for each of the 24 disaggregated sub-measures. Therefore, in order to correct the erroneous reference to this process as "stratified", BellSouth hereby submits substitute language for the proposed statistical technique, which is attached hereto as Attachment 1.

12. Wherefore, BellSouth respectfully requests that the Authority adopt the business rule language proposed by BellSouth for the reasons set forth above.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

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A Random Sampling for Proportions technique is used to provide a statistically valid sample from each of the Product Disaggregations. A list of all orders completed in the report month is generated. The orders are then listed by the disaggregations specified in the SQM. For each disaggregation, the quantity of completed orders and the error rate for each disaggregation from previous months are used as the basis for scenario testing to determine the number of orders that are to be reviewed to achieve a confidence interval of $\pm$ 5% for each disaggregation. Once the sample size for each disaggregation is determined the specified quantity of orders for each disaggregation are randomly chosen and pulled for review.

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2002, a copy of the foregoing document was served on the following parties, via the method indicated:

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