

Staff Recommendation
Service Quality Measurements
Performance Reports

Exhibit A

E911

Function:	Timeliness and Accuracy
Business Implications:	<ul style="list-style-type: none"> • BellSouth's goal is to maintain 100% accuracy in the E911 database for all its CLEC resale and retail customers by correctly processing all orders for E911 database updates. The 911 database update process ensures that the CLEC's updates are handled in parity with BST's updates. BST uses Network Data Mover (NDM) to transmit both CLEC resale and BST retail E911 updates to SCC (third party E911 database vendor) once per day for the entire region. No processing distinctions are made between CLEC records and BST records. These updates are processed within 24 hours. • CLECs ordering unbundled switching and facility-based CLEC E911 providers are responsible for the accuracy of their data that is input into the E911 database. Facilities-based CLEC record updates are transmitted by the CLEC directly to SCC without any BST involvement. • When BST retail or resale records experience errors in SCC's system, the errors are not returned to BST for correction. Instead, SCC handles and corrects all errors within 24 hours for both CLEC resale records and BST retail records. • BellSouth through its E911 third party vendor provides accuracy and timeliness measurements for BST and its CLEC resale customers. In addition, BellSouth through its E911 third party vendor provides an accuracy and timeliness report for CLECs ordering unbundled switching and facilities-based CLECs.
Measurement Methodology:	<p>1. $E911 \text{ Timeliness} = \frac{\Sigma (\text{Number of Confirmed Orders}) - (\text{Number of Orders missed in Reporting Period})}{(\text{Number of Orders Confirmed in Reporting Period})} \times 100$</p> <p>Definition: Measures the percentage of E911 database updates within a 24-hour period.</p> <p>Methodology: Mechanized metric from ordering system</p> <p>2. $E911 \text{ Accuracy} = \frac{\Sigma (\text{Total number of SOIR orders for E911 updates}) - [\text{Total number of Service Order Interface Records (SOIRs) with errors generated from Daily TN activity (based on the E911 Local Exchange Carrier Guide for Facility-Based Providers)}]}{(\text{Total number of SOIR orders for E911 updates})} \times 100$</p> <p>Definition: Measures the percentage of accurate 911 database updates</p> <p>Methodology: Mechanized metric from ordering system</p>

Staff Recommendation
Service Quality Measurements
Performance Reports

Exhibit A

E911

Reporting Dimensions:	Excluded Situations:
<ul style="list-style-type: none"> • BST Aggregate (Includes CLEC resale customers) • State and Regional Level 	<ul style="list-style-type: none"> • Any order canceled by the CLEC. • Order Activities of BST associated with internal or administrative use of local services
Data Retained Relating to CLEC Experience:	Data Retained Relating to BST Performance:
<ul style="list-style-type: none"> • Report Month • CLEC Order Number • Order Submission Date • Order Submission Time • Error Type • Error Notice Date • Error Notice Time • Standard Order Activity • State and Region 	<ul style="list-style-type: none"> • Report Month • Error Type • Average number of error • Standard Order Activity • State and Region

E911 Timeliness

	E911 Timeliness % within 24 Hours
CLEC A	X
CLEC AGGREGATE	X
BST AGGREGATE	X

E911 Accuracy

	E911 Accuracy %
CLEC A	X
CLEC AGGREGATE	X
BST AGGREGATE	X

TRUNK GROUP PERFORMANCE

Function:	Interconnection Trunk Performance
Measurement Overview:	In order to ensure quality service to the CLECs as well as protect the integrity of the BST network, BST collects traffic performance data on the trunk groups interconnected with the CLECs as well as all other trunk groups in the BST network.
Measurement Methodology:	<p>1. Comparative Trunk Group Service Summary: Provides comparative measurements of the trunk groups which exceed the blocking threshold during their busy hours, as well as the total number of trunk groups measured.</p> <p>2. Trunk Group Service Report: Contains the service performance results of all final trunk groups (both BST administered trunk groups and CLEC administered trunk groups) between Point of Termination (POT) and BST tandems or end offices, by region, by CLEC, CLEC Aggregate, and BST aggregate.</p> <p>Specifically measures the total number of trunk groups, number of trunk groups measured, and the number of trunk groups which exceed the blocking threshold during their busy hours.</p> <p>3. Trunk Group Service Detail: Provides a detailed list of all final trunk groups between POTs and BST end offices or tandems (A-end and Z-end for BST Local trunks) including the actual blocking performance when blocking exceeds the measured blocking threshold. The blocking performance includes the observed blocking number for a particular Trunk Group Serial Number (TGSN).</p> <p>Blocking thresholds for all trunk groups are 3%, except BST CTTG, which is 2%.</p> <p>Measured Blocking = [(Total number of Blocked Calls)/(Total number of Attempted Calls)] X 100</p>

Reporting Dimensions:	Excluded Situations:
<ul style="list-style-type: none"> • BST Trunk Group Aggregate • CLEC Trunk Group Aggregate • CLEC Trunk Group Specific • State, Region and <u>MSA</u>²⁸ Level 	<ul style="list-style-type: none"> • Trunk Groups for which valid traffic data measurement unavailable.
Data Retained Relating to CLEC Experience:	Data Retained Relating to BST Performance:
<ul style="list-style-type: none"> • Report Month • Total Trunk Groups • Total Trunk Group for which data available • Threshold exceptions • Exceptions percent of the total • State Region and <u>MSA</u>²⁹ • Exception Trunk detail 	<ul style="list-style-type: none"> • Report Month • Total Trunk Groups • Total Trunk Group for which data available • Threshold exceptions • Exceptions percent of the total • State Region and <u>MSA</u>³⁰ • Exception Trunk detail

²⁸ Ibid.

²⁹ Ibid.

³⁰ Ibid.

Staff Recommendation
Service Quality Measurements
Performance Reports

Exhibit A

TRUNK GROUP PERFORMANCE

1. Comparative Trunk Group Service Summary

CLEC 1		CLEC Aggregate		BST CTIG		BST Local	
# Trk Grps Blocked	Total Trk Grps Measured	# Trk Grps Blocked	Total Trk Grps Measured	# Trk Grps Blocked	Total Trk Grps Measured	# Trk Grps Blocked	Total Trk Grps Measured
X	X	X	X	X	X	X	X

2. Trunk Group Service Report

CLEC 1												
BST Administered												Region
	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TOTAL	
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 3% observed blocking	X	X	X	X	X	X	X	X	X	X	X	X
CLEC Administered												
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 3% observed blocking	X	X	X	X	X	X	X	X	X	X	X	X
TOTAL												
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 3% observed blocking	X	X	X	X	X	X	X	X	X	X	X	X

CLEC Aggregate												
BST Administered												Region
	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TOTAL	
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 3% observed blocking	X	X	X	X	X	X	X	X	X	X	X	X
CLEC Administered												
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 3% observed blocking	X	X	X	X	X	X	X	X	X	X	X	X
TOTAL												
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 3% observed blocking	X	X	X	X	X	X	X	X	X	X	X	X
PCT1	X	X	X	X	X	X	X	X	X	X	X	X

Staff Recommendation
Service Quality Measurements
Performance Reports

Exhibit A

TRUNK GROUP PERFORMANCE

BellSouth CTTG Trunk Group											
BST Administered	Region										
	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TOTAL
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 2% observed blocking	X	X	X	X	X	X	X	X	X	X	X
Independent Administered											
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 2% observed blocking	X	X	X	X	X	X	X	X	X	X	X
TOTAL											
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 2% observed blocking	X	X	X	X	X	X	X	X	X	X	X

BellSouth Local Network											
BST Administered	Region										
	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TOTAL
Total Trunk Groups:	X	X	X	X	X	X	X	X	X	X	X
Trk Grps Meas/Proc:	X	X	X	X	X	X	X	X	X	X	X
Tot Grps > 3% observed blocking	X	X	X	X	X	X	X	X	X	X	X

3. Trunk Group Service Detail

CLEC

ORDERED	TGSN	BST SWITCH	CLEC POT	DESC	OBSVD MAX BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
X	X	X	X	X	X	X	X	X	X	X

BST Common Transport Trunk Group

ORDERED	TGSN	TANDEM	END OFFICE	DESC	OBSVD MAX BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
X	X	X	X	X	X	X	X	X	X	X

BST Local Network

ORDERED	TGSN	A-End	Z-End	DESC	OBSVD MAX BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
X	X	X	X	X	X	X	X	X	X	X

Staff Recommendation
Service Quality Measurements
Performance Reports

Exhibit A

TRUNK GROUP PERFORMANCE

Trunking Definitions

Field Name	Description	Data Type
Switch	Identifier for the BellSouth end of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(11)
POT	Identifier for the CLEC Point of Termination(POT)of the Trunk Group. Part of 37 character Common Location Language Identifier(CLLI) code.	AlphaNum(11)
TANDEM	Identifier for the BellSouth Tandem end of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(11)
END OFFICE	Identifier for the BellSouth End Office of the Trunk Group. Part of 37 character Common Location Language Identifier(CLLI) code.	AlphaNum(11)
A-END	Identifier for the BellSouth Originating/Low Alpha end of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(11)
Z-END	Identifier for the BellSouth Terminating/High Alpha end of the Trunk Group. Part of 37 character Common Location Language Identifier(CLLI) code.	AlphaNum(11)
DESCRPT	Describes function/operation of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(15)
TGSN	Unique trunk group identifier. (Trunk Group Serial Number)	AlphaNum(8)
OBSVD BLKG	Blocking ratio determined from traffic data measurement.(Total number of calls blocked/Total number of calls attempted)	Numeric

Staff Recommendation
Service Quality Measurements
Performance Reports

Exhibit A

TRUNK GROUP PERFORMANCE

Trunking Definitions (Continued)

Field Name	Description	Data Type
TKS	Total number of trunks in service in a trunk group	Numeric
VAL DAYS	Total number of valid days of measurement	Numeric
NBR RPTS	Number of consecutive monthly reports for which the trunk group exceeded the measured blocking threshold	Numeric(2)
RMKS	Cause of blocking and/or release plan	AlphaNum

Staff Recommendation
Service Quality Measurements
Performance Reports

Exhibit A

Collocation

Function:	Response Interval, Provisioning Interval and Timeliness for Providing Collocation Space to a CLEC in a BellSouth Central Office.
Measurement Overview:	Collocation is the placement of customer-owned equipment in BellSouth Central Offices for interconnecting to BellSouth's tariffed services and unbundled network elements. BellSouth offers both Virtual and Physical Collocation and will report its performance on these offerings separately. The milestones in the process for which measurements will be provided is: the average time to respond to a request after we have the complete application; the average time between receiving the bona fide firm order until the space is turned over to the CLEC; and the percentage of due dates on firm orders missed.
Measurement Methodology:	<p>1. Average Response Time = Σ (Request Response Date & Time) - (Request Submission Date & Time) / Count of Request submitted in Reporting Period.</p> <p>Definition: Measures the average time from the receipt of a complete and accurate Collocation Request (including receipt of Application Fees) to the date BellSouth responds in writing.</p> <p>Methodology: Manual</p> <p>2. Average Arrangement Time = Σ (Date & Time Collocation Arrangement is Complete) - (Date & Time Order for Collocation Arrangement submitted) / Total Numbers of Collocation Arrangements Completed during Reporting Period.</p> <p>Definition: Measures the Average Time from the receipt of complete and accurate Firm Order (including Fees) to date BellSouth completes the Collocation Arrangement [Called "BellSouth complete date". Assumes space and construction complete and network infrastructure complete.]</p> <p>Methodology: Manual</p> <p>3. % of Due Dates Missed = (Number of Orders not completed w/i ILEC committed Due Date during reporting period) / (Number of Orders scheduled for completion in reporting period) X 100.</p> <p>Definition: Measures the percent of Collocation space request, including construction and network infrastructure, that are not complete on the due date.</p> <p>Methodology: Manual</p>

Reporting Dimensions:	Excluded Situations:
<ul style="list-style-type: none"> • State, Regional and <u>MSA</u>³¹ Level • Virtual • Physical 	<ul style="list-style-type: none"> • Any order canceled by the CLEC. • Time for BST to obtain any permits • Collocation contract negotiations
Data Retained Relating to CLEC Experience:	Data Retained Relating to BST Performance:
<ul style="list-style-type: none"> • Report Month • CLEC Order Number • Application Submission Date • Firm Order Submission Time • Space Acceptance Date 	<ul style="list-style-type: none"> • Report Month • Application • Application Response • Firm Order • BST Completion Data

³¹ Ibid.

5/2



BellSouth Telecommunications, Inc. 504 528-2050
Suite 3060 Fax 504 528-2948
365 Canal Street
New Orleans, Louisiana 70130-1102

Victoria K. McHenry
General Counsel - LA

August 10, 1998

BY HAND

Ms. Susan Cowart
Administrative Hearings Division
Louisiana Public Service Commission
P. O. Box 91154
Baton Rouge, LA 70821

State		
File No.		
Orders	<input type="checkbox"/>	<input type="checkbox"/>
	Sprint	O.P.
Corr.	<input type="checkbox"/>	<input type="checkbox"/>
Plead.	<input type="checkbox"/>	<input type="checkbox"/>
Disc.	<input type="checkbox"/>	<input type="checkbox"/>
Test.	<input type="checkbox"/>	<input type="checkbox"/>
Brief	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>
DATE RECEIVED		

AUG 11 '98

RE: LPSC, ex parte
Docket Number U-22252-C
In re: BellSouth Telecommunications, Inc.
Service Quality Performance Measurements

Dear Ms. Cowart:

Attached are the original and one (1) copy of BellSouth's Comments on the Staff's Initial Recommendation to be filed into the record of the referenced matter. Also included is an additional copy of this filing which we ask that you please date stamp for our files.

With kind regards, I am

Sincerely,

Victoria K. McHenry

VKM/as
Attachment

cc: Stephanie Folse, Esq. (w/enc)(via Federal Express)
Service List (w/enc)(via Federal Express)

Doc#126147

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION
Ex Parte

In Re: BellSouth Telecommunications, * Docket U-22252
Inc. Service Quality Performance * Subdocket C
Measurements * *

BELLSOUTH'S COMMENTS ON LOUISIANA PUBLIC SERVICE COMMISSION
STAFF'S INITIAL RECOMMENDATION

BellSouth Telecommunications, Inc. ("BST") submits the following comments regarding the Louisiana Public Service Commission ("LPSC") Staff's Initial Recommendation.

1. Performance Measurements.

Staff's Exhibit A sets forth the Commission's Interim Performance Measurements with certain recommended modifications. BellSouth has addressed the impact of MSA and product disaggregation modifications later in these Comments. With respect to the other proposed modifications, BellSouth's programmers have not had an opportunity to evaluate the impact of these modifications. Accordingly, BellSouth requests that it be given an opportunity to run the measures with these modifications, report back to the Commission with any problems it may encounter, and seek a re-evaluation based on any such problems.

2. Levels of Disaggregation.

Staff recommends a level of product and geographic disaggregation that far exceeds what BellSouth is reporting today using the current capabilities of its systems. BellSouth adamantly opposes at this time any level of disaggregation beyond that included in the Service Quality

Measurements ("SQM") attached as Exhibit 1 to its Original Comments for all of the reasons set forth in its Original and Reply Comments. These SQM were designed with the current capabilities of BellSouth's systems in mind. BellSouth's systems are already stretched to capacity and BellSouth is adding a half million dollar upgrade just to produce the current reports to the CLECs that are active today. To implement Staff's proposed reporting at multiple product and MSA levels would require months of additional work and millions more dollars of investment in reprogrammed computer software and additional hardware. BellSouth continues to believe that the Commission should endorse the interim measurements at the current level of disaggregation, and allow those CLECs that want additional disaggregation to negotiate and pay for that kind of reporting. To require this level of voluminous reporting across the board for all CLECs is unwarranted, wasteful and unnecessary.

a. Product Disaggregation.

BellSouth does not believe that any further product disaggregation is necessary at this time. In the event Staff continues to recommend reporting of five additional product categories, however, BellSouth urges the Commission to take into consideration the fact that it will take significant time and money to integrate this additional capability into BellSouth's existing systems. For example, BellSouth has begun the process to mechanically capture the information to report UNE Loops with LNP, and just this one addition will cost approximately \$700,000 and require 6-8 months to finalize.

BellSouth requests that, if the Staff finally recommends additional product disaggregation, that it establish workshops to further refine the definitions of the additional,

recommended products to be reported, and a workable timetable for implementing the additional products in a prioritized fashion.¹

b. **Geographic Disaggregation.**

BellSouth continues to oppose any further geographic disaggregation beyond the regional and state-wide levels it has proposed. BellSouth does business at these levels and should not be penalized by the fact that CLECs, who have no obligation to serve, have chosen to "cherry-pick" lucrative customers in certain urban areas. Requiring BellSouth to report on an MSA level unfairly forces it to generate-- at enormous expense to itself-- reports it does not do for itself today. Nothing in the Telecommunications Act of 1996 ("1996 Act") or this Commission's Regulations for Competition in the Local Telecommunications Market ("Local Regulations") imposes such a requirement on BellSouth. BellSouth has not categorically refused to generate this information; it has simply stated that this additional expense should be borne by CLECs who request and negotiate for such additional technically feasible disaggregation.

There are currently 8 MSAs in Louisiana which include approximately 24 parishes and 588 NPA/NXXs. To disaggregate by MSA potentially increases the number of data elements already being produced for Louisiana by a factor of 8 times. More importantly, it could easily statistically dilute the information to the point of rendering the reports useless. For example, if, out of 100 orders, all 100 occurred in a single MSA, then the vast majority of the data points

¹ If Staff's five additional product categories are adopted, it will be critical for Staff, BellSouth and the CLECs to reach consensus on the definition of the product categories to be reported. For example, Staff has proposed reporting for resale business POTS. It is unclear whether this means only flat rate business (and presumably it does) or also measured rate business lines (there are 38 of these in Louisiana). Additionally, it is not clear whether Staff's proposed reporting for resale Centrex includes all types of station lines associated with all Centrex services, e.g., ESSX, Prestige, MultiServ, as well as Centrex Features. Further, BellSouth does not know whether the category of resale ISDN means only basic rate, or also includes primary rate, 2-wire and 4-wire. BellSouth is not suggesting that these clarifications need to be made immediately, but only that they need to be discussed in further workshops before being implemented.

would consist of nothing but zeros. BellSouth does not believe there is sufficient activity in all MSAs to justify MSA level reporting at this time. Also, in addition to the 24 parishes within MSAs in Louisiana, there are 142 parishes outside of MSAs. Measurements for functions outside of the MSAs would be left out of the analysis which would also seriously dilute the meaningfulness of the reports.

If Staff continues to believe that "sub-state" reporting is necessary, then BellSouth requests that it consider reporting by TURF rather than by MSA. As testified to at the technical conference, BellSouth's network group does already perform certain internal reports in the provisioning and maintenance and repair categories, and implementing comparable reports for CLECs on this basis would be far less costly and burdensome. BellSouth has four TURF areas in Louisiana: central Louisiana, New Orleans Lake, New Orleans River, and north Louisiana. BellSouth believes that TURF reporting of appropriate measures (and by no means all measures as discussed further below) will generate more meaningful data than MSA reporting.

Staff has initially recommended reporting by MSA for each and every performance measure, with the exception of pre-ordering measures. BellSouth submits that it would serve no useful purpose to require "sub-state" reporting on each performance measure. If reporting is to be required at a "sub-state" level, it should be required only for those measures which potentially involve work that is performed at a "sub-state" level. Pre-ordering and ordering from BellSouth's CLEC ordering center is a regional operation and does not vary state by state, much less MSA by MSA. There is no reason, therefore, to require MSA reporting for the pre-ordering and ordering measures. Similarly, Billing, Operator Services, Directory Assistance, and E911 are centralized functions performed at the state and regional level and, therefore, also unsuited for MSA-level

reporting. Although collocations are performed in different central offices around the state, the process is the same in each central office. Moreover, because they are not performed by BellSouth for itself, reporting at a state-wide level will not "disguise real and important differences in performance." See *AT&T Original Comments*, pp. 9-10. There does not appear to be any useful information that can be generated by requiring performance reports for collocation measures on an MSA level, and certainly not information useful enough to justify the added cost of such reporting.

The only categories for which "sub-state" reporting can be accommodated are Provisioning, Maintenance and Repair, and Trunk Group Performance. Indeed, these are the only areas specifically noted by CLECs as being susceptible to discrimination in performance. For example, AT&T states: "Statewide or region-wide data will yield less meaningful comparisons than data that is provided according to the area in which the work is done. For example, in rural areas, travel times for dispatch activities may be longer or technology may be less modern than that found in urban areas." See *AT&T Original Comments*, at pp. 9-10.

BellSouth respectfully submits that, if the Staff remains determined to recommend sub-state reporting, that it do so at this time only for these three categories of performance measurements, until it can be demonstrated that additional reporting is warranted. Additionally, BellSouth requests that it be given appropriate time to implement this level of disaggregated reporting over the next 6 to 9 months. Given the vast amount of systems changes necessary to implement product and geographic disaggregation beyond what is reported today, the best and most cost efficient way to proceed is to make the necessary conversions on a smaller scale first, before expanding them to a broader universe. BellSouth requests that, if further disaggregation is

ordered (and BellSouth opposes further disaggregation), that it be ordered in a manageable fashion that would include, for example, implementing these changes on a sample of key product categories (e.g., IFR, 1FB, DS0, DS1, UNE 2-wire, DS0 Loop, DS1 Loop, Trunks); and generating TURF level reports on these categories for a sample of key measures in the Provisioning, Maintenance and Repair and Trunk Performance categories. This process can be discussed further in the workshops recommended by Staff.

3. **Standards and Benchmarks.**

Staff has initially recommended that performance benchmarks be set only for those measures where no retail analog exists. Additionally, Staff states that BellSouth should conduct special studies of its internal operations to establish the benchmark performance level, and that these studies and their associated methodology be further refined over the next six months with the continuation of workshops on performance measures.

BellSouth agrees that there is no need to establish benchmarks where there is a BellSouth retail analog. MCI's singular proposal for benchmarks even where there is a retail analog deserves no mention other than the fact that it did not garner even the support of the other CLECs in this docket. BellSouth also supports a process that involves industry workshops and review and comparison of data over the next 6 to 12 months (comparing BellSouth's Louisiana performance to that of other states as well as that of other ILECs). *See Staff Initial Recommendation, p. 11 and n.30.* Preparation of BellSouth internal studies may not be necessary after this review is completed; in any event such preparation should follow the same 6 to 12 month time line.

4. Statistical Tests.

Staff's initial recommendation does not endorse either BellSouth's statistical process control or the LCUG modified "z"-test. Staff states that it "is concerned that the process is too new to set in stone a particular statistical methodology, especially without further study." *See Staff Initial Recommendation, p. 13.* Staff recommends further study and workshops in which the parties can work in a collaborative fashion to reach agreement on an appropriate statistical methodology and, in the interim, proposes that BellSouth perform both the statistical process control *and* the modified "z"-test. Staff bases this latter recommendation at least in part on its understanding that BellSouth does not oppose running both tests. *See Staff Initial Recommendation, at p. 14.*

BellSouth endorses the use of workshops regarding the statistical process control and the modified "z"- test. Although BellSouth can understand Staff's view that information derived from running both tests would be theoretically helpful in deciding ultimately on one methodology, the hard reality is that BellSouth's systems are simply not capable of running the "z"- test at this time, and would require major renovation in order to permit them to do so. BellSouth has already developed the coding requirements for its SQM reports, and the raw data (numbers) required to compute standard deviations on those dimensions where an average is computed are not now tracked and maintained by our system. This means that, before BellSouth could even start the process to evaluate any statistical analysis tool, it would have to reprogram many of the report codes to capture the appropriate numbers to use for this effort. Additionally, after receiving Staff's initial recommendation, BellSouth learned that the 4GL programs used in

the system do not have a mathematical analysis capability and the data will have to be moved into another system entirely to perform any such analysis.

BellSouth respectfully submits that it would make little sense to require it to spend the time and resources to develop the capability to run the "z"- test now only to conclude down the road that the test is, as BellSouth contends today, seriously flawed. Expenditure of this kind of time (months of time), money and effort is unwarranted absent further study of the alleged, major deficiencies in the test and a correction of those deficiencies. BellSouth requests that Staff not require running of the "z"-test until it has participated in at least one workshop dedicated to the review of the alleged flaws in that statistical process. If Staff is convinced after that workshop that the "z"- test is sufficiently promising to warrant further study, then it could require dual testing in an appropriate time frame. Alternatively, BellSouth requests the Staff to order that this test be run only on a sampling of measures, rather than the full universe of measures. This would allow Staff to capture the kinds of information it is interested in reviewing, while minimizing the burden on BellSouth. The workshops are an appropriate forum to address which measures should be included in the sample.

5. Reporting, Auditing and Data Detail.

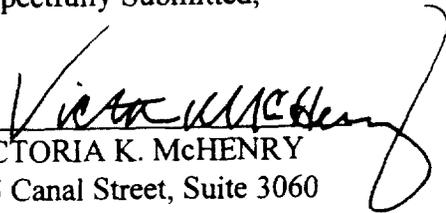
BellSouth is in general agreement with the Staff initial recommendations in this section. It is especially appropriate to impose the full cost of CLEC-initiated audits and half the cost of the BellSouth annual audit on CLECs given that BellSouth has borne the full cost of implementing performance measurements to this point in time. BellSouth agrees to an annual comprehensive audit of its performance measurements for both BellSouth and CLECs for each of

the next five years. At the workshops established under Staff's recommendation, the parties can work out the details of how and when this audit will be conducted.

6. **Enforcement and Dispute Resolution.**

BellSouth is in general agreement with the initial Staff conclusions in this section which are consistent with the initial conclusions of the FCC on identical issues. *See Notice of Proposed Rulemaking, In Re: Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56.* It is BellSouth's position that unilaterally required "self-executing" penalties or "credits" are illegal. *See BellSouth's Post-Technical Conference Comments.* Even assuming they were legal, it is certainly premature to impose them absent full resolution of the issues remaining to be discussed and resolved in the further workshops recommended by Staff.

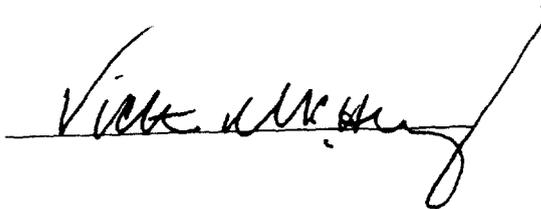
Respectfully Submitted,


VICTORIA K. McHENRY
365 Canal Street, Suite 3060
New Orleans, LA 70130
504-528-2050

Attorney for
BellSouth Telecommunications, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served on all parties of record by telecopy or Federal Express, postage prepaid, on this 10th day of August, 1998.

A handwritten signature in black ink, appearing to read "Vicki M. King", written over a horizontal line.

#129704

CERTIFICATE OF SERVICE

I, Catherine M. DeAngelis, do hereby certify that on this 28th day of August, 1998, copies of the foregoing "Reply Comments of Sprint Communications Company L.P." were mailed, first class postage prepaid, unless otherwise indicated, to the following parties:

Chairman William E. Kennard
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, DC 20554

Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W.
Room 832
Washington, DC 20554

Commissioner Michael Powell
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, DC 20554

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, DC 20554

Commissioner Gloria Tristani
Federal Communications Commission
1919 M Street, N.W.
Room 826
Washington, DC 20554

Janice Myles
(5 copies)
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

Donald J. Russell, Chief **
Carl Willner
Frank Lamancusa
Telecommunications
Task Force
Antitrust Division
U.S. Department of Justice
1401 H Street, NW - 8th Floor
Washington, DC 20005

Kathryn Brown, Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Room 500
Washington, DC 20554

Melissa Newman
Assistant Division Chief
Policy and Program Planning Division
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W., Room 544B
Washington, DC 20554

Claudia Pago
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Room 538D
Washington, DC 20554

William Agee
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Room 534P
Washington, DC 20554

David Kershner
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Room 534A
Washington, DC 20554

Florence Setzer
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Room 534A
Washington, DC 20554

International Transcription Service
Room 140
2100 M Street, N.W.
Washington, D.C. 20554

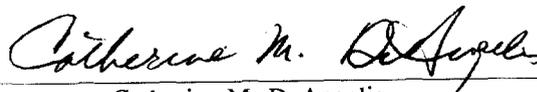
Carol Matthey, Chief
Policy and Program Planning Division
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Andrea Kearney
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Room 544K
Washington, DC 20554

Claudia Fox
Common Carrier Division
Federal Communications Commission
1919 M Street, N.W.
Room 534H
Washington, DC 20554

Brian Eddington **
General Counsel
Louisiana Public Service Commission
P.O. Box 91154
Baton Rouge, LA 70821-9154

Michael K. Kellogg **
Counsel for BellSouth
Kellogg, Huber, Hansen,
Todd & Evans, P.L.L.C.
1301 K Street, N.W.
Suite 1000 West
Washington, D.C. 20005-3317


Catherine M. DeAngelis