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March 14, 2007

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PUBLIC SERVICE
COMMISSION

Re: Petition of SouthEast Telephone, Inc., for Arbitration
PSC 2006-00316

Dear David:

In SouthEast Telephone, Inc.'s Post-Hearing Brief filed on February 23, 2007, in the above-referenced case, SouthEast stated on page 21 that "SouthEast does not even have access to BellSouth's 'SEEMS' data." There was no citation in your brief for that statement, so I am not sure where you got that information, but I wanted to let you and your clients know that SouthEast does, in fact, have access to both Self-Effectuating Enforcement Mechanisms ("SEEM") and Service Quality Measurement (SQM) data if they want it through the Performance Measurement & Analysis Platform ("PMAP") website: <http://pmap.bellsouth.com/>.

As information, BellSouth Telecommunications, Inc. d/b/a AT&T Southeast provides monthly performance data to all CLECs, including SouthEast, on its PMAP website. Among the Maintenance and Repair performance reports provided on this website are: Percent Missed Repair Appointments, Customer Trouble Report Rate, Maintenance Average Duration, Percent Repeat Customer Troubles within 30 Days, and Out of Service (OOS) > 24 Hours. These performance measurements were adopted by all nine AT&T Southeast state commissions and have associated remedy payments pursuant to the applicable SEEM plans. These performance results are available for the CLECs in the aggregate, as well as for each individual CLEC. Indeed, SouthEast has an active profile and password to access these reports, and according to AT&T Southeast's website logs, SouthEast has logged into this website on a number of occasions.

In addition to these standard reports, AT&T Southeast also makes available to each CLEC the raw data associated with the monthly SQM reports. Specifically, AT&T Southeast makes available to each CLEC upon request "Supporting Data Files," which

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contain the data used to produce the monthly performance reports; also provided are "Other Supporting Data Files" that contain additional CLEC data that are excluded from the monthly reports because the measurement definition or other criteria require exclusion. SouthEast can specify the data contained in these reports that it wants to see by logging into the PMAP website, clicking on "View/Request PMAP Data", next "View/Extract Supporting Data", and then "New Supporting Data Request." Upon gaining access to this page on the website, SouthEast is able to request the data it wants, available as Supporting Data or Other Supporting Data, relative to any of the Maintenance and Repair measures, as well as any other reported measures. SouthEast can then review for itself, by various criteria that SouthEast wishes to use, such as a telephone number, to review specific instances where a dispatch resulted in a 'No Trouble Found' disposition.

The SEEM plan is used to determine the level of remedy payments BellSouth d/b/a AT&T Southeast is required to pay a CLEC if it fails to meet established performance standards. AT&T Southeast makes available to CLECs monthly reports, referred to as PARIS reports, specifying the remedy payments due to a CLEC by measurement. The determination of whether a performance standard is met or missed is based on a statistical program that performs calculations at a very detailed level. Thus, the underlying data associated with AT&T Southeast's SEEM calculations are extensive and complex and, as such, are not posted on the PMAP website. Rather, if a CLEC is interested in reviewing this detailed data or in the replication of the PARIS reports, AT&T Southeast allows the CLEC to come on-site and upon signing a nondisclosure agreement will be given access to the data and instructions necessary to reproduce its specific SEEM data calculations. This process is also posted on the PMAP website.

There are tutorials and a PMAP user guide on the website, in addition to other aids. If your client has any trouble accessing this information, please let me know so we can help them in using this website.

Sincerely,


Mary K. Keyer

cc: Ms. Beth O'Donnell, Kentucky Public Service Commission
Ms. Amy E. Dougherty, Kentucky Public Service Commission

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