



BellSouth Telecommunications, Inc.

333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

Guy M. Hicks
General Counsel

615 214 6301
Fax 615 214 7406

September 13, 2002

VIA HAND DELIVERY

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

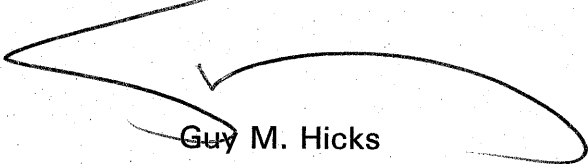
Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Chairman Kyle:

Consistent with the terms of the Settlement Agreement relating to performance measurements approved by the Authority in this proceeding, BellSouth is filing fifteen copies of a Notification Report for the October 2002 data month and a Preliminary Notification Report for the data month of November 2002. These Reports are being filed with all of the state public service commissions in BellSouth's nine-state region.

Copies of the enclosed are being provided to counsel of record. Thank you for your assistance in this regard.

Very truly yours,


Guy M. Hicks

GMH:ch

PROPOSED OCTOBER 2002 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the October 2002 data month. Results for the October 2002 data month will be posted as follows:

Preliminary results November 21, 2002
Final results December 2, 2002

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* OSS-2

Description of Change: Beginning with May 2002 data, the results from the ATLAS and COFFI systems were inadvertently reported separately. Because the SQM requires combined availability results from the ATLAS and COFFI systems, BellSouth proposes combining these results to be consistent with the SQM. This proposed change was Item (1) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ1669)

Impact of Change: None, as the results are the same for both systems.

(2) *Affected Measures:* O-8, O-9, O-14 & O-15

Description of Change: In its June 2002 Data Notification, BellSouth proposed making coding changes to capture an additional identifier for Local Service Requests ("LSRs") submitted via EDI. This change was implemented in Release 10.5. Similar changes must now be made to capture this identifier for LSRs submitted via TAG, and processed through LEO or the LNP Gateway. The purpose of this change will be to ensure that PMAP recognizes and uses these additional identifiers in calculating performance results. This proposed change was Item (2) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ1141, RQ1627 & RQ1673)

Impact of Change: Less than 1.0% increase in LSR volume.

- (3) *Affected Measures:* All Ordering Measures.

Description of Change: Operating Company Number (OCN) 4384 was assigned to KPMG Consulting, Inc. ("KCI") for purposes of the third party test, and thus was excluded from CLEC aggregate results. KCI has since released this OCN, making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in ordering measurements going-forward. This proposed change was Item (3) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ0948)

Impact of Change: None

- (4) *Affected Measures:* O-11

Description of Change: To calculate the non-trunk data associated with this measure, BellSouth currently takes a "snapshot," generally on the 2nd day of the month. BellSouth now proposed that this snapshot be taken no later than the 4th day of the month. Taking the snapshot on the 4th day of the month will allow additional time to report completeness for Local Service Requests ("LSRs") received late in one month for which a FOC or Reject is sent early the following month. This proposed change was Item (4) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ1644)

Impact of Change: BellSouth is unable to quantify the impact of this change, but expects it to be minimal.

- (5) *Affected Measures:* PO-1

Description of Change: Currently, the MSS data for Manual Loop Makeup Response time is being measured against a benchmark of 3 minutes. This data should be measured against a benchmark of 3 Business Days. This proposed change was on item (4a) the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ1631)

Impact of Change: An improvement in BellSouth's reported performance.

Provisioning Measurements

- (6) *Affected Measures:* All Provisioning Measures.

Description of Change: Operating Company Number (OCN) 4384 was assigned to KCI for purposes of the third party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN, making it assignable to a CLEC. BellSouth will need

to make a coding change so that OCN 4384 is included in provisioning measurements going-forward. This proposed change was Item (6) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ0948)

Impact of Change: None

- (7) *Affected Measures:* P-3, P-4, P-5, P-6, P-9 & P-10

Description of Change: BellSouth proposes making a coding change to exclude orders with a miscellaneous account code and a class of service code of ADF, that are being issued to establish billing on resale and retail customers for DSL and satellite TV. Currently, these orders are being captured in the Retail and Resale Business, and Retail DSL categories, even though these orders are for billing and administrative purposes and should be excluded from the measures listed above, consistent with the SQM. This proposed change was Item (7) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ831)

Impact of Change: Approximately 2.3% of BellSouth retail orders completed in June 2002 in Georgia would be affected by this change and would have been excluded from the affected measures. This change would have a minimal impact on Resale results, as there were only approximately 10 such orders in June 2002.

- (8) *Affected Measures:* P-4

Description of Change: BellSouth proposes making coding changes to use the issue date on the Service Order as the initial timestamp for the Order Completion Interval (OCI) measure. The issue date would then be used as the initial timestamp, rather than the application date. The issue date and the application date are generally the same. However, in some cases when the Service Order is modified the application date is revised. This revision occurs even though the same Service Order is being used to provision the service. For example, if a customer changes the due date after the Service Order is issued, the application date may be changed to the date when the new due date is entered on the order. In such cases, the issue date would not change. Because the date for purposes of calculating OCI should not vary depending upon modification of a Service Order, BellSouth believes using the issue date is more appropriate. This proposed change was Item (8) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ0717)

BellSouth provided further clarification following the August 7 Data Notification workshop: The "issue date" field represents the date the service order is issued into SOC's. The "application date" field is the date the customer has provided to BellSouth a firm commitment for the service, and complete and accurate information to allow for the processing of the service order. Both fields are mechanically populated, and generally are identical. However, the "issue date" field is protected and cannot be changed, while

the "application date" is not protected and can be manually changed, which happens periodically. One example of when this might occur is when a service representative uses a completed order as a template, and changes the application date to reflect the date the service representative worked on the order. Because of the possibility, however remote, that the "application date" field may change, BellSouth proposes to base Order Completion Interval calculations on the "issue date."

Impact of Change: BellSouth estimates that this change will impact less than 1% of the Service Orders for both wholesale and retail.

(9) *Affected Measures:* P-5

Description of Change: BellSouth proposes making a change to correct the beginning timestamps for purposes of calculating the Average Completion Notice Interval (ACNI) for Design orders. This change would correct the current problem with inflation of the ACNI interval. The interval becomes inflated because it is measured from the first circuit location, rather the last one when the entire work order is completed. This change is consistent with the SQM, which requires that the ACNI interval measure the "elapsed time between the BellSouth reported completion of work and the issuance of a valid completion notice to the CLEC." This proposed change was Item (9) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ759)

BellSouth provided further clarification following the August 7 Data Notification workshop: There are several scenarios when orders are completed in steps. All design orders that are controlled via WFA-C have work steps for each part of the order. For example, for class of service USL (Unbundled DS1 Loop) there would be a work step for the central office administered via WFA-DI and a work step for the outside technician administered via WFA-DO. These steps are always completed independently and the status of each step is reflected individually. When each step is completed the order goes CP and then immediately returns to PD (Pending Dispatch) until all work steps are complete. Therefore, design orders will always have multiple CP stamps, and PMAP is capturing the first timestamp for ACNI reporting when it should be capturing the last CP timestamp for purposes of calculating this measure.

Impact of Change: BellSouth estimates that this change will cause a significant reduction in the ACNI intervals for both CLECs and BellSouth, although BellSouth retail results will experience a greater reduction because BellSouth tends to have more orders with more circuit locations. Most notices are sent within the hour of completion and the current Design intervals are in the hundreds of hours (for example, in April 2002, the Georgia Design Dispatch ACNI Mechanized interval was 304 hours, compared to 41 hours for the CLECs).

- (10) *Affected Measures:* P-7A

Description of Change: BellSouth proposes to simplify the replication of data for this measure by pre-classifying data in 3 categories: "early", "on-time", and "late". Using these 3 categories to pre-classify the data will aid in replication and validation of data. It will also reflect these classifications earlier in the process. No change in coding is involved in producing the results. This proposed change was Item (10) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ1570)

Impact of Change: None.

Maintenance & Repair Measurements

- (11) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: BellSouth proposes implementing a coding change that would identify WFA records in PMAP that have a mismatch between a company code and product code. This would allow BellSouth to assign an error code for tracking and analysis purposes when, for example, a BellSouth company code indicates a UNE product. This proposed change was item (11) on the Preliminary October Data notification filed on August 1, 2002. (RQ1140)

Impact of Change: None

- (12) *Affected Measures:* MR-1, MR-2, MR-3, MR-4, & MR-5

Description of Change: Currently ADSL products are identified using a hard coded work around product ID routine. BellSouth proposes a change that will begin using the standard product ID routine for ADSL products that is used for other products. This proposed change was Item (12) on the Preliminary October 2002 Data Notification filed on August 1, 2002. Although the Preliminary notice indicated that this change would also affect MR-6 and MR-7, it will not. (RQ1261)

Impact of Change: None

- (13) *Affected Measures:* All M&R Measures.

Description of Change: Operating Company Number (OCN) 4384 was assigned to KCI for purposes of the third party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN, making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in maintenance and repair measurements going-forward. This proposed change was item (13) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ0948)

Impact of Change: None

(14) *Affected Measures:* M&R 2

Description of Change: Currently some line count records provided to PMAP by the source systems contain incorrect wire center identifications. This causes records to fall into an error bucket that is excluded from the measures, impacting UNE 2-wire analog loop non-design lines. BellSouth proposes implementing a change to use the wire/frame table (initially described in the Preliminary September Data Notification filed on July 1, 2002) as an additional means to identify valid wire center information. Using the wire/frame table will reduce the number of records falling into error bucket due to incorrect wire center identifications. This proposed change was Item (14) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ1611)

Impact of Change: BellSouth estimates that this change will cause the denominator for CLEC data for this measure to increase, which will improve the customer trouble report rate performance for CLECs.

Third Party Testing

BellSouth is making the following changes to address Observations and Exceptions issued by KCI in connection with the third-party test:

(15) *Affected Measures:* O-1 & O-2

Description of Change: KCI Georgia Exceptions 159 and 160 and Florida Exceptions 178 and 179 found that some records which had spaces included in the OCN did not appear in the data for these measures even though an acknowledgement had been passed. BellSouth proposes making a change so that these records are counted in the calculation of these measures. (RQ1695)

Impact of Change: For May 2002 <2% of the records were excluded from both measures.

(16) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, & P-10 and also P-3A & P-4A in Florida

Description of Change: Florida Observation 176, which related to the "Provisioning: Average Completion Notice Interval" SQM report, identified an issue that occurs on partial port outs, which involve the migration of some lines from a multi-line account. This activity is being captured in the BellSouth retail reports as disconnects. BellSouth is making coding changes to capture the necessary identifiers to recognize that the order is a

CLEC order and that the disconnect should be excluded consistent with the SQM. (RQ1277)

Impact of Change: BellSouth is unable to quantify the impact of this change, but expects it to be minimal.

(17) *Affected Measures:* P-1

Description of Change: This proposed change is in response to Georgia Draft Exception 204, and affects SQM reports for P-1, which KCI was unable to replicate. The SQM requires that BellSouth disaggregate the P-1 report for the particular missed appointment description "Equipment", "Facilities" and "Other". To comply with this requirement, the fields necessary to separate held orders into equipment, facilities, and other categories need to be added to the SQM report. MSS data already reflects these three categories. (RQ1683)

Impact of Change: None. This change is to enable replication of the measure.

(18) *Affected Measures:* P-7

Description of Change: This item addresses KCI Georgia Exception 165, and involves KCI's inability to replicate the Hot Cuts % Troubles within 7 Days of Service Order Completion measure. The identification of orders as dispatch vs. non-dispatch for raw data was not being derived from the table developed to calculate the Hot Cut measures. BellSouth proposes implementing a change to identify dispatch status for both the raw data and the measurement consistently. (RQ1741)

Impact of Change: None. This change is to enable replication of the measure.

PRELIMINARY NOVEMBER 2002 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the November 2002 data month. Results for the November 2002 data month will be posted as follows:

Preliminary results December 21, 2002
Final results January 2, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measure:* O-7, O-8, O-9, O-11, O-13, O-14, & O-15

Description of Change: The State ID for a service request is identified by the second character of the service order number. One TIRKS processor handles both North Carolina and South Carolina and populates an "X" in the second character of all C orders for designed services. Currently, all orders with "X" in the second position of the order number are assigned a state ID of "NC". Therefore, SC orders for designed services are assigned NC service order numbers and are reported in the NC results. BellSouth is considering a coding change to properly assign the state identification to designed orders in North and South Carolina. (RQ826)

Impact of Change: For March 2002, 135 fully mechanized and 90 partial mechanized LSRs for designed services in South Carolina were identified as "NC" in the data.

- (2) *Affected Measures:* O-8 & O-9

Description of Change: In addition to reporting the percent of Rejects and Firm Order Confirmation (FOCs) returned within the Commission's benchmarks, the SQM also requires that BellSouth report the average interval for return of FOCs or Rejects. BellSouth currently reports the average interval for Non-Mechanized Rejects and all FOCs in days. For non-Trunk products the report should be in hours, consistent with the SQM, and BellSouth is considering a change to comply with this requirement. (RQ975)

Impact of Change: No impact on performance relative to the benchmark

(3) *Affected Measures:* O-12

Description of Change: Currently BellSouth reports Residence and Business service center results separately, and reports the Local Carrier Service Center (LCSC) results for CLECs as one number. BellSouth is considering reporting combined Business and Residence service center results in addition to the existing reporting of separate results. (RQ997)

Impact of Change: None.

(4) *Affected Measures:* O-9, O-11 & O-15

Description of Change: Several months ago, BellSouth began including "dummy" FOCs in the measurement data. A "dummy" FOC is an acknowledgment to the CLEC that a request to cancel an LSR has been processed. Some "dummy" FOCs are not being included in the data. As a result, these canceled LSRs are reflected in the measure as if they did not receive a response. To fix this problem, each cancellation must have an accompanying FOC record as well, and BellSouth is considering modifying the code to make this change so that these additional "dummy" FOCs will be included in the measure. (RQ1660)

Impact of Change: For the 502,537 FOC records for July data, 2408 records were cancels, but did not show an accompanying FOC. Less than 0.5% impact for O-9 and O-11 July data. For the 20,909 LNP FOC records for July data, 448 records were cancels, but did not show an accompanying FOC. Less than 0.5% impact for O-15 July data.

(5) *Affected Measures:* O-3 & O-4

Description of Change: All LNP LSRs submitted as Expedites are currently counted as Planned Manual Fallout on the Flow-Through Report. However, the LNP system does not drop all Expedites for Planned Manual handling, since standalone LNP Expedites are eligible to flow through. BellSouth is considering plans to modify the LNP Flow-Through script to reflect this fact. (RQ1742)

Impact of Change: Less than 0.5% change in results.

(6) *Affected Measures:* O-3 & O-4

Description of Change: Currently, supplemental LSRs, except those with an entry of 04 in the SUP field, are treated as planned manual fallout. A change is being considered to

treat supplemental LSRs as eligible to flow through if they meet the flow through eligibility requirements that apply to an original LSR. In addition, a supplemental LSR with an entry of 05 in the SUP field, where the only change being made is a change in the due date, is also being considered to be treated as eligible to flow through. (RQ1743)

Impact of Change: Less than 1% of 20,604 Total Mechanized LSRs received in May 2002 were classified as Planned Manual Fallouts but should have been classified as Issued Service Orders in the May 2002 LNP Flow Through Report.

(7) *Affected Measures:* O-3, O-4, O-5, & O-6

Description of Change: Although the BellSouth business rules specify that a purchase order number (PON) should not be reused for two years, mechanized systems will accept reused numbers after 6 months. When an LSR is processed, data required to classify that LSR on the Flow Through report is sometimes placed in the LNOTE and LEOERR tables in PMAP. For example, the LNOTE table may have a value of 'MANUALP,' indicating that the LSR was planned manual fallout. Or the LEOERR table may indicate that the LSR was clarified back to the CLEC. The LNOTES and LEOERR tables retain data longer than 6 months, which means that if the PON is reused, data used to classify the previous LSR using that PON may be used to classify a current LSR using the same PON. These old messages may result in incorrect classification of LSRs in the Flow-Through report, and these messages may be included in the Error Analysis report and LSR Detail reports. BellSouth is considering a change to include a filter in the Flow-Through scripts to select only those messages that were generated in the reporting month or later. (RQ1744)

Impact of Change: Based on May 2002 data less than 0.5% of LSRs had notes in the LEOERR or LNOTE tables that were from previous months.

(8) *Affected Measures:* O-7, O-8, O-9, O-11, O-13, O-14, & O-15

Description of Change: A minimal number of LSR records are not being counted in these measures because of inconsistencies in the data. This situation occurs when the record indicates that a FOC or Reject was sent, but there is no timestamp indicating when it was sent, or vice versa. This coding change will cause PMAP to perform additional checks to locate a timestamp for the response when the record indicates that a response was sent and indicate that the response was sent if a timestamp exists for it. (RQ1752)

Impact of Change: For the 602,110 FOC and Clarification records for July data, 57 records were shown as receiving a FOC, but did not show an accompanying stop time OR as having a stop time with no accompanying FOC/Clarification indicator set. For the 25,769 LNP FOC and Clarification records for July data, 3 records were shown as receiving a FOC, but did not show an accompanying stop time. Based on these data, the change should have less than 0.1% impact on the results for the affected measures.

- (9) *Affected Measures:* O-8, O-9, O-14 & O-15

Description of Change: Currently the interval for FOC and Reject is measured from the time that BellSouth receives the LSR until the CLEC actually receives the response. This method elongates the interval by including time where BellSouth attempted to send the response, but the CLEC was unable to receive it. BellSouth is considering a change in the calculation to end the interval when BellSouth first attempts to send the response. (RQ1813)

Impact of Change: The FOC and Reject intervals will be reduced for less than 1% of LSRs.

- (10) *Affected Measures:* O-12

Description of Change: Beginning with July 2002 data, Ordering and Repair calls for Retail Small Business customers were combined into a single universal call receipt center. Consequently, the data for Retail Small Business includes call volumes for both Ordering and Repair, and the speed of answer for Retail Small Business ordering and repair calls cannot be determined separately. BellSouth is considering implementing a change in the calculation of this measure to report retail Small Business data apart from the other retail units. (RQ1868)

Impact of Change: Reduction in reported call volumes for Ordering and Repair Centers.

Provisioning Measurements

- (11) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, P-10, P-12 & P-14

Description of Change: To remain consistent with the SQM, administrative orders should be excluded from these measures. However, BellSouth has determined that a type of administrative order associated with administrative changes to a large volume of existing customer accounts is not being excluded. This type of administrative order, called a MECHSO order, is typically necessary to change USOCs or FIDs. It is commonly issued as an automatic completion (ACY), both for BellSouth retail and wholesale customers. An example of a MECHSO order is when a state public service commission mandates a change in the class of service in a calling area to include an entire county. BellSouth is considering a change to exclude MECHSO orders from these provisioning measures as required by the SQM. This change was Item (5) on the Preliminary October 2002 Data Notification filed on August 1, 2002. (RQ606)

Impact of Change: BellSouth is unable to quantify the impact for each of the affected measures, but expects it to be minimal, as the base of orders should be reduced by less than 1%.

- (12) *Affected Measures:* P-3, P-4, P-4A, P-5, P-6, P-9, and P-10

Description of Change: BellSouth is considering an additional coding change to meet the CLECs' request to include more records in the data that straddle multiple months. Orders currently completed in SOCS after the end of the snapshot for the reporting period are not being reported in any PMAP reports. All orders are to be reported after completion in the affected measures. With this proposed change, if an order is completed in SOCS after the end of the reporting period, it will receive a flag to identify it as a record needing to be reported in the report month in which it is typed "complete." Completions will be considered in the report month in which they are typed "complete," rather than by the completion date on the order. This ensures all completed orders will be reported. The possible change in the reporting month will not affect data or intervals reported for each record. (RQ530)

Impact of Change: .2 - .5% of completed orders that are currently not reported will be included in completed order base.

- (13) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, & P-10

Description of Change: With PMAP 4.0, certain orders issued to establish COIN service for Coin Providers are being identified as CLEC Resale Business instead of as Retail Business when their RESH identifiers match to a CLEC Company Code. BellSouth is considering a change to ensure that these orders are correctly captured as BellSouth Retail Business. (RQ1639)

Impact of Change: Less than 0.5% change in volume and even smaller change in results.

- (14) *Affected Measures:* P-1, P-3, P-4, P-5, P-6, P-9, & P-10

Description of Change: With PMAP 4.0, certain administrative orders that only change account information (such as a CLEC name change) were being included in the Provisioning reports. BellSouth is considering a change to include these orders consistent with the SQM. (RQ1696)

Impact of Change: Minimal impact, 0.2% of orders.

- (15) *Affected Measures:* P-9

Description of Change: This item only affects raw data for this measure in Louisiana due to a lack of time interval information for each record in the raw data views. BellSouth is considering a change that will add a new column to the PMAP raw data views that will allow the calculation of the time interval between the time a service order completes and the time the first trouble is received. (RQ1699)

Impact of Change: No impact on results.

(16) *Affected Measures:* P-6

Description of Change: Orders that have received an L appointment code are being excluded from this measure. BellSouth is considering a change to include these records. (RQ1715)

Impact of Change: Upon review against April data, implementing this change would improve reported performance for the region from an average of 14.1% to 6.7%

Maintenance & Repair Measurements

(17) *Affected Measures:* MR-2

Description of Change: In anticipation of system changes scheduled for next year, BellSouth is considering developing a new methodology for determining line counts for 2-Wire Analog Loop Non-Design and ADSL services. The coding change, which would utilize the new feed from the WFA Network Services Database (NSDB), would more accurately capture line counts for these services. Initially BellSouth would utilize this new data feed for line count information for Alabama, with other states moving to the new feed in the future. (RQ1134)

Impact of Change: Impact is still being analyzed.

(18) *Affected Measures:* MR-2

Description of Change: BellSouth currently joins records from the TIRKS system to the WFA database to identify additional information for product determination. In this process a small number of line count records are duplicated. BellSouth is considering developing a unique key to obtain the needed product derivation information without creating duplicate records. (RQ1291)

Impact of Change: Less than 0.1% reduction in the number of lines in service and a smaller change in results across all states based on the April report months' data.

(19) *Affected Measures:* MR-2

Description of Change: Line counts for the UNE Copper Loop-Non-Designed (UCL-ND) product (198) are not reflected in the data. This occurs because UCL-ND are identified by a circuit ID in LMOS instead of a telephone number. BellSouth is considering developing a process to capture the Wire Center location for non-designed records that are identified by a circuit ID format. (RQ1708)

Impact of Change: Impact is still being analyzed

(20) *Affected Measures:* MR-6

Description of Change: Beginning with July 2002 data, Ordering and Repair calls for Retail Small Business customers were combined into a single universal call receipt center. Consequently, the data for Retail Small Business includes call volumes for both Ordering and Repair, and the speed of answer for Retail Small Business ordering and repair calls cannot be determined separately. BellSouth is considering implementing a change in the calculation of this measure to report retail Small Business data apart from the other retail units. (RQ1868)

Impact of Change: Reduction in reported call volumes for Ordering and Repair Centers.

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2002, a copy of the foregoing document was served on the following parties, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Michael Hopkins, Esquire
McKenna & Cuneo
1900 K Street, NW
Washington, DC 20006

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

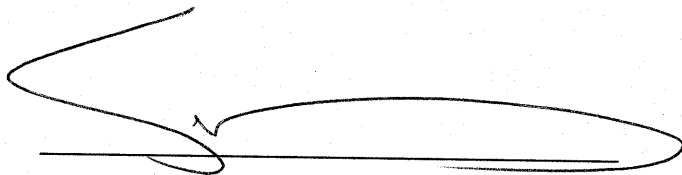
Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Dana Shaffer, Esquire
XO Communications, Inc.
105 Malloy Street
Nashville, TN 37201

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line.