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General Counsel

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January 9, 2003

VIA HAND DELIVERY

The Honorable Sara Kyle, Chairman
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 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 February 2003 data month and a Preliminary Notification Report for the data month of March 2003. 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

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Bennett L. Ross
General Counsel - Georgia

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January 2, 2003

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's
Operations Support Systems; Docket 8354-U*

*Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale; Docket No. 7892-U*

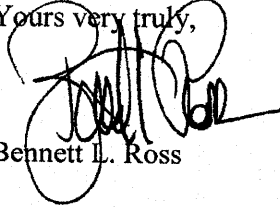
Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the February 2003 data month and a Preliminary Notification Report for the data month of March 2003. These proposed changes will be discussed at the January 8, 2003 industry conference call.

Enclosed for filing please find an original and eighteen (18) copies, as well as an electronic version, of these Notification Reports. I would appreciate your returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter, and please let me know if you have any questions or need additional information.

Yours very truly,


Bennett L. Ross

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BLR:nvd

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)
Parties of Record (w/enclosure) (via electronic mail)

474521/474119/474121

PROPOSED FEBRUARY 2003 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the February 2003 data month. Results for the February 2003 data month will be posted as follows:

Preliminary results March 21, 2003
Final results March 31, 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 Measures:* OSS-1, OSS-2, and all Pre-Ordering and Ordering

Description of Change: With the implementation of Release 11.1, CLECs may submit Pre-Orders and Firm Orders via Direct XML in addition to LENS, TAG, and EDI. BellSouth proposes to implement changes to PMAP code to extract data and calculate performance results to capture Direct XML transactions. Since Direct XML will eventually replace TAG and consistent with the discussions on the December 6, 2002 industry call, Direct XML transactions will be included in the reported data for the TAG interface. This issue was addressed as Item (1) on the Preliminary February 2003 Data Notification filed on December 2, 2002.

Impact of Change: No impact on the data.

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

Description of Change: Currently, the OSS Saturday downtime for Fully and Partially-Mechanized LSRs sourced from LENS or TAG used in PMAP is 10:50 p.m. However, the actual downtime starts at 10:00 p.m. BellSouth proposes to correct the downtime in the coding to match the actual downtime. This proposed change was Item (2) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2113)

Impact of Change: Based on July 2002 data intervals for 3.0% of Rejects and 1.75% of FOCs would be reduced by up to 50 minutes.

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

Description of Change: Currently, for the OSS downtime used in PMAP BellSouth is excluding mechanized LNP LSRs from 9:00 a.m. to 11:00 a.m. CST on the first Sunday of the month only. However, system downtime is actually 9:00 a.m. – 12:00 p.m. CST each Sunday. BellSouth proposes to correct the downtime in the coding to match the actual downtime. This proposed change was Item (3) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2183)

Impact of Change: Minimal. For August 2002 there was no impact.

Provisioning Measurements

- (4) *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: Orders currently completed in SOCS after the end of the snapshot for the reporting period are not being reported in any PMAP reports. 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," rather than by the completion date on the order. This change will ensure that all completed orders will be reported and will address the CLECs' request that more records that straddle multiple months be included in the performance data. This proposed change was Item (12) on the Preliminary November 2002 Data Notification filed on September 3, 2002. (RQ530)

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

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

Description of Change: Currently, raw data includes certain data fields that are not used in and are unnecessary to the calculation of performance for this metric and also includes some data fields that are mislabeled. BellSouth proposes to remove these unnecessary data fields from raw data and correct the labeling of certain other data fields. (RQ1872)

Impact of Change: None.

(6) *Affected Measures:* P-10

Description of Change: This measure is reported separately for Fully Mechanized, Partially Mechanized and Non-Mechanized LSRs. However, the Partially Mechanized data includes both Partially Mechanized and Non-Mechanized orders. BellSouth proposes to correct the data to remove Non-Mechanized LSRs from the Partially Mechanized data. This proposed change was Item (4) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ1954)

Impact of Change: This change would only affect the CLEC Aggregate Regional Report. For August 2002 the average interval for Partially Mechanized orders was reduced from 2.63 days to 1.22 days.

(7) *Affected Measures:* P-3A (Trunks) (Florida Only)

Description of Change: Currently, the denominator for this metric for trunks is the total number of trunks, instead of the total number of appointments on orders for trunks completed in the reporting period. BellSouth proposes to change the denominator to equal the total number of appointments. This proposed change was Item (5) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2014)

Impact of Change: The measurement result will increase by 1-2% for both retail and wholesale.

(8) *Affected Measures:* P-7A, P-7B & P-8

Description of Change: Currently, an OCN/ACNA column is not provided on the CLEC specific SQM reports for these measures. BellSouth proposes adding this column to the reports. This proposed change was Item (7) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2237)

Impact of Change: None.

Maintenance & Repair Measurements

(9) *Affected Measures:* M&R-1

Description of Change: Currently, the CLEC specific SQM report for Missed Repair Appointments for resale also shows data for UNEs as a separate line on the report. BellSouth proposes removing the line reflecting UNE data from this report. UNEs will continue to appear on the UNE reports. This proposed change

was Item (8) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ1693)

Impact of Change: None.

(10) *Affected Measures:* M&R-2

Description of Change: Currently, the data on the SQM reports for states other than Louisiana and Florida is reported by MSA and should be reported as a State total. BellSouth proposes to make a change to report State level data for all states other than Louisiana and Florida. In Louisiana the data should be reported by MSA, and the Florida SQM reports already reflect State level data. This proposed change was Item (9) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ1694)

Impact of Change: None.

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

Description of Change: Currently, raw data includes certain data fields that are not used in and are unnecessary to the calculation of performance for these metrics and also includes some data fields that are mislabeled. BellSouth proposes to remove these unnecessary data fields from raw data and correct the labeling of certain other data fields. (RQ1872)

Impact of Change: None.

(12) *Affected Measures:* M&R 1, M&R 2, M&R 3, M&R 4, & M&R 5

Description of Change: Currently, duplicate records in LMOS for the same trouble report are being incorrectly excluded between the snapshots and the Warehouse stages of the PMAP process. BellSouth proposes changing the code to include all of these records in the data Warehouse. This proposed change was Item (10) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2054)

Impact of Change: Minimal. In August 2002, for Florida and Georgia only 20 trouble tickets were identified as being excluded.

(13) *Affected Measures: M&R-2*

Description of Change: Currently, PMAP is overstating the number of retail design lines in service for services => DS1 speed, because records with 'TIE' as part of the circuit ID are being counted. These records are not retail circuits, but are TIE cables between BellSouth and CLEC collocation spaces. The facilities are administered by BellSouth so they appear in the data as BellSouth circuits, merely assigned a circuit ID for inventory management purposes. BellSouth proposes a coding change to exclude these records. This proposed change was Item (11) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2133)

Impact of Change: Based on June 2002 data, the Retail Design retail analog will increase by .11% across the region.

(14) *Affected Measures: M&R-4*

Description of Change: In LMOS there are three dates associated with trouble reports that relate to this measure: received date, cleared date, and closed date. The received date is the date the trouble report was received, the cleared date is the date the technician corrected the trouble condition and closes the report, and the closed date is the time that the data center processor is updated. Since the inception of this measure, BellSouth has been calculating performance results based on the cleared date. However, incorrect coding was introduced in connection with a prior PMAP change (Item 10 on BellSouth's June 2002 Data Notification), which caused the closed date to be used incorrectly in calculating performance results. For some customers located in a different time zone from the LMOS data processor, it is possible to have a closed date and time stamp earlier than the cleared date and time stamp, which results in a missed repeat report. The change BellSouth is proposing would return to use of the cleared date in calculating results. This proposed change was Item (12) on the Preliminary February 2003 Data Notification filed on December 2, 2002, as clarified in BellSouth's letter of December 17, 2002. (RQ2172)

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

(15) *Affected Measures: M&R-2*

Description of Change: Currently, the CLEC specific SQM reports for this metric show a 0 percent, even though the correct numerator and denominator are present. BellSouth proposes to modify this report to reflect the actual percentage in the results. This proposed change was Item (13) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2177)

Impact of Change: None.

(16) *Affected Measures:* M&R-4

Description of Change: Currently, for WFA tickets in PMAP, the interval to determine whether a repeat trouble occurs is calculated from date the first trouble is received to the date when the second trouble ticket is resolved. It should be calculated from the date the first trouble ticket is resolved to the date the second trouble report is received. Consequently, the numbers of repeat troubles for retail and wholesale are slightly understated. The change BellSouth is proposing would correct this situation. This proposed change was Item (14) on the Preliminary February 2003 Data Notification filed on December 2, 2002, as clarified in BellSouth's letter of December 17, 2002. (RQ2497)

Impact of Change: The impact is expected to be minimal. For Louisiana in September 2002, only two records were omitted.

PRELIMINARY MARCH 2003 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the March 2003 data month. Results for the March 2003 data month will be posted as follows:

Preliminary results April 21, 2003
Final results April 30, 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 Measures:* OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 12.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported.

Impact of Change: None.

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

Description of Change: At present, a minimal number of LSR records are not being counted in these measures 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. This proposed change was Item (19) on the Proposed November 2002 Data Notification filed on October 1, 2002. (RQ1752)

Impact of Change: For the 602,110 FOC and Clarification records for July data, 57 records were shown as receiving a FOC, with no 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.

Provisioning Measurements

(3) *Affected Measures:* P-9

Description of Change: Currently, PMAP is improperly calculating the results of this measure for trunks. The issue is best illustrated by an example using a trunk service order ("SO") with 50 trunks on the order. If there is a trouble on one or multiple individual trunks on the SO, then all 50 trunks are currently counted as trouble reports in the numerator of the calculation, while 1 SO is being captured in the denominator. This leads to a result of 5000% (50 trunks / 1 SO), which is inconsistent with the business rules in the SQM for this measure. The result of the measure should never exceed 100% since the business rules clearly state that only the first trouble report is counted, and not any subsequent reports. BellSouth proposes changing the calculation of this measure by measuring the number of service orders with trouble reports divided by the number of service orders. This would ensure that the calculation for trunks mirrors the calculation for non-trunks. With this methodology, using the above example, the numerator would decrease from 50 to 1 and the denominator would remain 1, which would lead to the correct result of 100%. (RQ2595)

Impact of Change: For the July 2002 Trunk report, the impact of this change would be as follows:

GA/BST	Current Result is 40%; Numerator = 24/Denominator = 60 Proposed Result is 1.67%; Numerator = 1/Denominator = 60
SC/CLEC	Current Result is 2400%; Numerator = 216/Denominator = 9 Proposed Result is 1.1%; Numerator = 1/Denominator = 9
Regional	Current BST Result is 49.72%; Numerator = 264/Denominator = 531 Proposed Result is 1.5%; Numerator = 8/Denominator = 531 Current CLEC Result is 88.52%; Numerator = 216/Denominator = 244 Proposed Result is .4%; Numerator = 1/Denominator = 244

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2003, a copy of the foregoing document was served on the following parties, via the method indicated:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
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☐ Facsimile
☐ Overnight

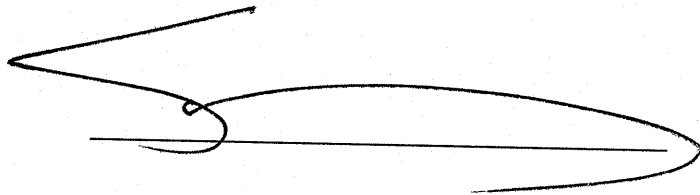
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☐ Overnight

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

A large, stylized handwritten signature in black ink, consisting of a long horizontal stroke with a large loop at the end and a smaller loop at the beginning.