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February 13, 2003

IN REGULATORY AUTHORITY
DOCKET ROOM

VIA HAND DELIVERY

The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

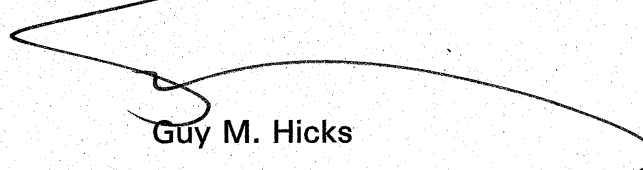
Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

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 March 2003 data month and a Preliminary Notification Report for the data month of April 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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February 3, 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:

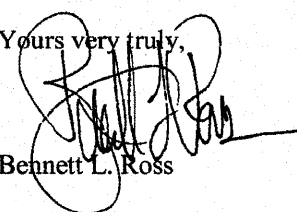
Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the March 2003 data month and a Preliminary Notification Report for the data month of April 2003. These proposed changes will be discussed at the February 7, 2003 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.

There is one additional matter that BellSouth would like to bring to the attention of the Commission and the parties. In its Data Notification Report for November 2002, BellSouth provided notice of a change to the M&R-2 metric in connection with the phased-in replacement for BellSouth's legacy system LMOS (Item 15). Although scheduled with December 2002 data, the change was not made until January 2003 data.

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

BLR:nvd
Enclosures

Mr. Reece McAlister
February 3, 2003
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cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)
Mr. Patrick Reinhardt (w/enclosure) (via electronic mail)
Parties of Record (w/enclosure) (via electronic mail)

477628/478788/478883

PROPOSED MARCH 2003 DATA NOTIFICATION

BellSouth proposes 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, unless otherwise noted. 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. This proposed change was Item (1) on the Preliminary March 2003 Data Notification filed on January 2, 2003.

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 (2) on the Preliminary March 2003 Data Notification filed on January 2, 2003. (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.

(3) *Affected Measures:* O-9

Description of Change: This item is related to Item 6 below, which addresses BearingPoint Florida Exception 192 for Interconnection Trunks for the "Ordering: Reject Interval" SQM. Consistent with the SQM, scheduled OSS Maintenance, which begins on Sundays at 10:50 P.M. and ends at 6:00 A.M. on Monday, should be excluded from this metric. When a LSR is received on Sunday after 10:50 P.M., the start time should be 6:00 A.M. Monday. However, currently, when an LSR is received after 10:50 P.M. Sunday, the time from 10:50 P.M. until the time the LSR was received, as well as the time between 6:00 A.M. Monday until a FOC is returned is being included in the FOC interval. For example, assume an LSR is received on Sunday at 10:56 P.M. and a FOC is returned at 6:02 A.M. Monday; currently PMAP is calculating the FOC interval as 8 minutes, when it should be 2 minutes. BellSouth proposes to correct the code for this metric to exclude the appropriate scheduled OSS Maintenance. (RQ2598)

Impact of Change: For the 484,101 FOC records for December region-wide data, 34 (0.007%) records were received after 10:50 P.M. on Sundays and were calculated with an improper duration.

Provisioning Measurements

(4) *Affected Measures:* P-10

Description of Change: This item is related to Item 7 below, which addresses BearingPoint Florida Exception 199 and Georgia Draft Exception 242 for "Provisioning: Local Number Portability (LNP) - Total Service Order Cycle Time (TSOCT)" SQM. TSOCT is calculated as Service Order Completion Notice Date minus Service Request Receipt Date. When there are multiple versions of an LSR, PMAP is using the submission date of only the last valid version of the LSR submitted as the Service Request Receipt Date. BellSouth proposes using the earliest start date of each valid LSR that results in a service order as the Service Request Receipt Date. (RQ2246)

Impact of Change: For the region 1.3% of the records are impacted.

(5) *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%. This proposed change was Item (3) on the Preliminary March 2003 Data Notification filed on January 2, 2003. (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

Third Party Testing

(6) *Affected Measures:* O-8

Description of Change: This item addresses BearingPoint Florida Exception 192 for Interconnection Trunks for the "Ordering: Reject Interval" SQM. Consistent with the SQM, scheduled OSS Maintenance should be excluded from this metric, which begins on Sundays at 10:50 P.M. and ends at 6:00 A.M. on Monday. When a LSR is received on Sunday after 10:50 P.M., the start time should be 6:00 A.M.

Monday. However, currently, when an LSR is received after 10:50 P.M. Sunday, the time from 10:50 P.M. until the time the LSR was received, as well as the time between 6:00 A.M. Monday until a reject is returned is being included in the reject interval. For example, assume an LSR is received on Sunday at 10:56 P.M. and a reject is returned at 6:02 A.M. Monday; currently PMAP is calculating the reject interval as 8 minutes, when it should be 2 minutes. BellSouth proposes to correct the code for this metric to exclude the appropriate scheduled OSS Maintenance. (RQ2598)

Impact of Change: For the 99,823 Reject records for December region-wide data, 2 (0.002%) records were received after 10:50 P.M. on Sundays and were calculated with an improper duration.

(7) *Affected Measures:* P-14

Description of Change: This item addresses BearingPoint Florida Exception 199 and Georgia Draft Exception 242 for "Provisioning: Local Number Portability (LNP) - Total Service Order Cycle Time (TSOCT)" SQM. LNP-TSOCT is calculated as Service Order Completion Notice Date minus Service Request Receipt Date. When there are multiple versions of an LSR, PMAP is using the submission date of only the last valid version of the LSR submitted as the Service Request Receipt Date. BellSouth proposes using the earliest start date of each valid LSR that results in a service order as the Service Request Receipt Date. (RQ2246)

Impact of Change: For the region 10.1% of the records are impacted.

(8) *Affected Measures:* P-7A (Florida and Tennessee.)

Description of Change: This item addresses BearingPoint Florida Exception 193 for the "Provisioning: Coordinated Customer Conversions-Hot Cut Timeliness Percentage Within Interval and Average Interval" SQM. In Florida and Tennessee, BellSouth reports hot performance involving IDLC separately. Currently, SQM data for this sub-metric in Florida and Tennessee is capturing the number of SL1 and SL2 IDLC conversions in both the numerator and denominator for this measure. BellSouth proposes making a change that will count the number of IDLC conversions in the denominator only. This change will result in the numerator being a count of the IDLC Hot Cut failures, and the denominator a count of the total number of IDLC conversions during the reporting period. Furthermore, MSS data for this sub-metric in Florida and Tennessee is capturing the total number of SL1 and SL2 conversions in both the numerator and denominator for this measure. BellSouth proposes making a change that will result in the numerator being a count of the IDLC Hot Cut

failures, and the denominator a count of the total number of IDLC conversions during the reporting period. (RQ2584)

Impact of Change: For October 2002 SQM data SL1 IDLC reported volume is 90 and should be 81 and SL2 IDLC reported volume is 29 and should be 24. For MSS SL1 IDLC reported volume is 301 and should be 81 and SL2 IDLC reported volume is 52 and should be 24. All cuts met the 4-hour window defined in the SQM and percentages would remain at 100%.

(9) *Affected Measures:* O-6 (Louisiana only)

Description of Change: This item addresses BearingPoint Louisiana Exception 1 for the "Ordering: Firm Order Confirmation (FOC) Timeliness" SQM. The two interval buckets $>24 - \leq 36$ hrs and the $>36 - \leq 48$ hrs for the FOC Timeliness Partially Mechanized CLEC LA and FOC Timeliness Partially Mechanized Regional reports posted for Louisiana do not match the current Louisiana SQM. BellSouth proposes to report this data in a $>24 - \leq 48$ hrs bucket consistent with the Louisiana SQM. (RQ2380)

Impact of Change: None.

(10) *Affected Measures:* O-9

Description of Change: This item addresses BearingPoint Georgia Exception 198 and Florida Exception 191 for Interconnection Trunks for the "Ordering: Firm Order Confirmation (FOC) Timeliness" SQM. When an ASR record is updated with subsequent version information, not all fields are appropriately updated. Specifically, the date confirmed field still contains the FOC information from the prior version of the ASR, which results in a negative FOC interval. BellSouth proposes changing the code so that the date confirmed field is updated with the appropriate information. (RQ 2686)

Impact of Change: BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

(11) *Affected Measures:* P-7C

Description of Change: This item addresses BearingPoint Georgia Exception 165 for "Provisioning: Hot Cuts - Percent Provisioning Troubles within 7 Days" SQM. Currently, zero due dated hot cut orders are not included in the data. BellSouth proposes correcting the PMAP code to capture these orders in this measure. (RQ2605)

Impact of Change: The regional impact for November 2002 indicated an increase of 0.22%.

PRELIMINARY APRIL 2003 DATA NOTIFICATION

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

Preliminary results	May 21, 2003
Final results	May 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, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* O-1, O-8, O-9, O-14, and O-15

Description of Change: Currently, all OSS downtime hours are hard coded in PMAP. BellSouth proposes placing these hours in a table that will be accessed by the code to make it easier to reflect changes in the downtime hours. (RQ1018)

Impact of Change: None.

- (2) *Affected Measures:* O-7 (Louisiana only) and O-10 (Florida only)

Description of Change: Currently, the Regional SQM Reports posted to the web for Louisiana and Florida for these two sub-metrics erroneously contain state-specific data. BellSouth proposes changing these reports to reflect regional data. (RQ1688)

Impact of Change: Regional data will be added to the Louisiana and Florida Region SQM Reports.

(3) *Affected Measures:* O-11

Description of Change: Currently, there are two raw data files used for calculating results for this measure, one of which contains all the data necessary for the calculation. BellSouth proposes utilizing the one raw data file rather than two. (RQ1823)

Impact of Change: None

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

Description of Change: In addition to current methods used to identify the state location for an LSR that can be submitted with only the telephone number, BellSouth proposes adding a table that associates NPA to state as another source for state identification. (RQ2239)

Impact of Change: In September 2002 data, BellSouth did not report approximately 1.4% of orders data due to missing end user state code information.

(5) *Affected Measures:* O-7, O-9 & O-11

Description of Change: These changes address three metrics, two of which are subject to third-party testing exceptions -- Florida Exception 204 (O-7) and Florida Exception 205 (O-11). Currently, orders received via EDI that are processed through COG and that go into Jeopardy are excluded from these three metrics. BellSouth proposes changing the coding to capture these orders in these metrics. (RQ2275)

Impact of Change: This change would impact 4 of 206 COG LSRs provided by BearingPoint.

(6) *Affected Measures:* O-1, O-2, O-3, O-4, O-7, O-8, O-9, O-13, O-14 & O-15

Description of Change: An enhancement made in December 2002 to the ordering system increased the number of orders that flow through, which PMAP is not currently capturing. Also, these orders appear as Partially Mechanized instead of Fully Mechanized in other ordering reports. BellSouth proposes to make the necessary coding changes to capture and report these orders correctly. (RQ2454 and RQ2463)

Impact of Change: None

(7) *Affected Measures:* O-7

Description of Change: For Partially Mechanized and Non-Mechanized Percent Rejected Service Requests for SQM data posted to the web, BellSouth is double counting certain LSRs and Rejects that rollup into certain multiple group products. In this case, one LSR is counted in both the PBX and Business categories. BellSouth proposes correcting the SQM code to count each LSR only once. (RQ2522)

Impact of Change: For October 2002 Percent Rejected Service Requests data Partially Mechanized, 85,811 LSRs were reported on the SQM Web Report while 85,805 LSRs were reported in Raw Data. Six (0.007%) LSRs were double counted for the SQM Web Reports. For Non-Mechanized, 26,750 LSRs were reported on the SQM Web Report and 26,649 were reported in Raw Data, which is a difference of 101 LSRs (0.38%). There was no impact for Fully Mechanize LSRs.

Provisioning Measurements

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

Description of Change: When a BellSouth or CLEC service order is completed in SOCS but encounters an error in the Billing systems, the order is placed in a hold file for manual resolution. To resolve the billing issue, a correction order is subsequently issued. BellSouth has discovered that these corrections are being counted in the data of the affected provisioning measures, which should not be the case. BellSouth is considering changes in the coding to remove these correction orders from the affected measures. (RQ1680)

Impact of Change: This change would impact only 209 BellSouth records in July 2002 out of a total of 570,144 records and would impact zero CLEC records. This change would reduce the BellSouth total by .00037%.

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

Description of Change: BellSouth has identified a problem where PMAP incorrectly performs product classification. When a non-design order which has a re-used service order number comes into PMAP, and the previous service order number was for a designed service, PMAP classifies the current order by the previous design information which is stored in an internal PMAP table. BellSouth proposes a coding change that would involve comparing additional fields to determine the proper product classification. (RQ1716)

Impact of Change: This change would impact only three records in Georgia for December 2002.

(10) *Affected Measures:* P7A

Description of Change: PMAP currently represents SQM exclusions associated with cutover delays with specific 'cause' codes *i.e.* W01, W02 etc. Technicians occasionally type the letter 'O' instead of the numeral '0' when entering 'cause' information which results in the delay being incorrectly counted as a BellSouth-caused delay. BellSouth proposes to change the coding to correct this problem. (RQ1945)

Impact of Change: Based on a review of October 2002 data, % Hot Cuts beginning on time would increase by .027%

(11) *Affected Measures:* P-6, P-6A, P-6B, P-6C and P-6D (Louisiana only)

Description of Change: Currently, Louisiana raw data does not include the MSA description field needed to assist in replication of MSA level reports. BellSouth proposes to include the MSA description field in raw data. (RQ2233)

Impact of Change: None.

(12) *Affected Measures:* P-9 (Louisiana only)

Description of Change: BellSouth is producing Percent Provisioning Troubles Within 30 Days and Percent Provisioning Troubles Within 5 Days for Louisiana in SQM reports. Because the Louisiana SQM does not require the former report, BellSouth proposes to eliminate it from the Louisiana posting. (RQ2407)

Impact of Change: No impact on required data.

(13) *Affected Measures:* P-11

Description of Change: Orders for products that are classified in the "UNE - Other" category for other Provisioning measurements and Resold Digital Services are not reflected in the results for the Service Order Accuracy metric. Additionally, ISDN PRI Business Non-Design orders are being erroneously classified as Resale Design when they should be classified as Resale Business. BellSouth is considering coding changes to correct both of these issues. (RQ2459)

Impact of Change: Based on the October 2002 report, the number of orders analyzed for Service Order Accuracy increased by 83 (2.5%).

(14) *Affected Measures:* P-8

Description of Change: Currently PMAP is calculating this measure based on the number of service orders, i.e., using orders divided by orders to calculate the percentage of xDSL lines tested. Because the SQM requires the calculation to be based on the number of lines, BellSouth proposes to change the calculation consistent with the SQM. (RQ2723)

Impact of Change: Based on November 2002 data, the measurement result would decrease by 0.67%.

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

Description of Change: BellSouth is currently counting sub-rate 64 kbps services associated with an ISDN PRI, which can be ordered and reported separately, in the $\geq$ DS1 bucket. BellSouth proposes to move these records into the $<$ DS1 bucket for both BellSouth and the CLECs. (RQ2735)

Impact of Change: For BellSouth regional data in December 2002, 76 retail service orders and one CLEC service order would have changed categories.

M&R Measurements

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

Description of Change: BellSouth is currently counting sub-rate 64 kbps services associated with an ISDN PRI, which can be ordered and reported separately, in the $\geq$ DS1 bucket. BellSouth proposes to move these records into the $<$ DS1 bucket for both BellSouth and the CLECs. (RQ2729)

Impact of Change: Based on November 2002 data for Measure MR-2 changed as follows:

	<DS1 Before	< DS1 After	$\geq$ DS1 Before	$\geq$ DS1 After
Retail	2.4%	1.5%	0.4%	0.7%
CLEC	1.7%	1.4%	4.0%	5.7%

Billing Measurements

- (17) *Affected Measures:* B-6

Description of Change: The SQM states that a usage record in the 30+ day interval bucket will be added using an average interval of 31.5 days. Because BellSouth is currently using a 31-day interval, BellSouth proposes to make coding changes necessary to calculate this metric consistent with the SQM. (RQ2718)

Impact of Change: There is a minimal impact of < .01% to this measure.

Database Measurements

- (18) *Affected Measures:* D-1

Description of Change: Regional SQM reports are currently being posted to the PMAP web site, even though the current SQM does not specify the generation or posting of any Regional reports. BellSouth proposes to discontinue posting the Regional reports to the PMAP web site since state specific reports are available. (RQ2529)

Impact of Change: None.

PARTIES OF RECORD

8354-U/7892-U

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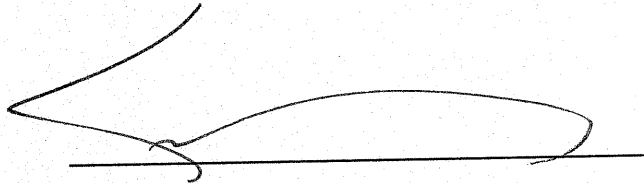
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