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March 11, 2003

Guy M. Hicks
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615 214 6301
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TN 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 April 2003 data month and a Preliminary Notification Report for the data month of May 2003. Also enclosed is a copy of a letter describing three minor corrections to the April Notification Report. 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,

A handwritten signature in black ink, consisting of a large, stylized 'G' followed by 'uy M. Hicks'.

Guy M. Hicks

GMH:ch

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March 3, 2003

DELIVERED BY HAND

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

Re: *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 April 2003 data month and a Preliminary Notification Report for the data month of May 2003. These proposed changes will be discussed at the March 7, 2003 industry conference call.

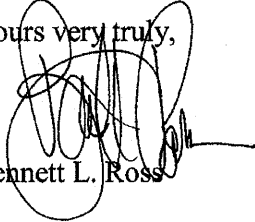
Enclosed for filing please find an original and eighteen (18) copies, as well as an electronic version, of these Notification Reports. I would appreciate your returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

There are two additional matters that BellSouth would like to bring to the attention of the Commission and the parties. In its November 2002 Data Notification filed on October 1, 2002, BellSouth provided notice of changes to Measure P-2 (Average Jeopardy Notice Interval) and Measure D-2 (Percent Database Update Accuracy) to address two exceptions and one observation issued by BearingPoint in connection with the third-party test in Georgia and Florida, respectively. These changes were Items 29 and 30 on the November 2002 Data Notification and were scheduled to be implemented with November data. However, these changes were not actually implemented until December 2002 data.

Mr. Reece McAlister
March 3, 2003
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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

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)

482115/482109/482110

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8354-U/7892-U

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(02/19/03)

PROPOSED APRIL 2003 DATA NOTIFICATION

BellSouth proposes 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-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. This proposed change was Item (2) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ1688)

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

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

Description of Change: BellSouth is incorrectly counting certain Completions Notices (CN) as FOCs for LNP products, as a result of which the FOC interval is being improperly lengthened. In particular, if a LNP LSR is received and a FOC is sent in one month, and the CN is returned the next month, PMAP is counting two FOC intervals. The first interval from LSR receipt to the sending of the FOC is counted correctly. However, the CN returned in the following month is also counted as a FOC in the following month and the interval is calculated from the

time the LSR was received. BellSouth proposes to modify the code to only count the actual FOC return time in the measure. (RQ1753)

Impact of Change: For September 2002 data BellSouth's performance was understated for 3309 of 53249 (6.2%) LNP LSRs.

(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 of the data necessary for calculation. BellSouth proposes utilizing the one raw data file rather than two. This proposed change was Item (3) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ1823)

(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. This proposed change was Item (4) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2239)

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

(5) *Affected Measures:* O-9

Description of Change: – This item is related to Item 25 below which addresses Florida Exception 204 and Florida Exception 205. Currently, orders received via EDI that are processed through COG and that go into Jeopardy are incorrectly excluded from this metric. BellSouth proposes changing the coding to capture these orders in these metrics. This proposed change was Item (5) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (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, although PMAP is not currently reflecting them as such. 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. This proposed change was Item (6) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2454 and RQ2463)

Impact of Change: Less than .5% increase in Flow-Through.

(7) *Affected Measures:* O-7

Description of Change: For Percent Rejected Service Requests, the SQM requires that BellSouth calculate the percentage that the LSRs rejected for each product represents of the total LSRs rejected for all products. BellSouth has determined that in making this calculation, certain LSRs are being double counted. Specifically, LSRs for PBX, Centrex, and ISDN products are being counted twice. BellSouth proposes correcting the SQM code to count each LSR only once in calculating the Total Percent Rejected. This proposed change was Item (7) on the Preliminary April 2003 Data Notification filed on February 3, 2003, although BellSouth originally indicated that this change would impact Partially Mechanized and Non-Mechanized LSRs. BellSouth has since determined that it will affect Fully Mechanized LSRs as well. (RQ2522)

Impact of Change: Based on January 2003 Percent Rejected Service Requests data for the State of Georgia, 101 LSRs were counted twice.

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

Description of Change: When an LSR is originally received in one month and a later version is received in a subsequent month and the later version has an error identified in DOM, the later version of the LSR is being incorrectly counted as Flow-Through instead of a CLEC or BellSouth error. BellSouth proposes a change to the Flow-Through code to count these LSRs in the appropriate error category instead of Issued Service Orders. (RQ2809)

Impact of Change: In December 2002 data, there were 74 LSRs incorrectly classified as Issued Service Orders. Fifty-four of those LSRs were actually BellSouth Errors, 19 were planned manual fallout, and one was a CLEC Error. The overall impact would result in a .02% reduction for UNE and Aggregate flow-through.

Provisioning Measurements

- (9) *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 proposes changes in the coding to remove these correction orders from the affected measures. This proposed change was Item (8) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (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%.

- (10) *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. This proposed change was Item (9) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ1716)

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

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

Description of Change: In investigating BearingPoint Georgia Exception 162 and Florida Exception 190, BellSouth has determined that for both wholesale and retail orders with same day intervals, the interval is incorrectly being calculated as 1440 minutes (24 hours) rather than 480 minutes (8 hours), which is the time the provisioning centers are open. BellSouth proposes correcting the calculation for same day intervals. (RQ1928)

Impact of Change: For POTS reports, less than .05% of records had a same day interval that would be impacted by this change.

- (12) *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. This proposed change was Item (10) on the Preliminary April 2003 Data Notification filed on February 3, 2003. In addition, BellSouth has determined that in Florida no CLEC caused delays are being excluded from the Hot Cut Timeliness report. BellSouth proposes to correct this issue in Florida as well. (RQ1945)

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

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

Description of Change: The PMAP buckets, Digital Loops <DS1 and Digital Loops >=DS1, include Frame Relay service within their data. In order to correctly assign Frame Relay service to either of these buckets, speed level information must be provided. However, BellSouth is currently using an incorrect USOC to designate a circuit as <DS1. BellSouth proposes to use different USOCs to identify speed level, which should be sufficient to ensure that future Frame Relay requests are properly assigned to Digital Loops <DS1 or Digital Loops >= DS1. This proposed change was Item (6) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2088).

Impact of Change: Based on July 2002 data, 36 orders would move from <DS1 to >=DS1.

- (14) *Affected Measures:* P-6, P-6A, P-6B, P-6C & 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. This proposed change was Item (11) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2233)

Impact of Change: None.

- (15) *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. This proposed change was Item (12) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2407)

Impact of Change: No impact on required data.

(16) *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 proposes coding changes to correct both of these issues. This proposed change was Item (13) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2459)

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

(17) *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. This proposed change was Item (14) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2723)

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

(18) *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. This proposed change was Item (15) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (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

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

Description of Change: In certain cases BellSouth administrative trunks are identified with a CLEC ACNA. BellSouth has determined that these trunks and associated troubles are incorrectly being reflected in these metrics. Because the SQM requires that troubles associated with administrative services should be excluded from these metrics, BellSouth proposes to implement coding changes to correct this problem. (RQ2728)

Impact of Change: Based on December 2002 data, this change would result in the exclusion of 10,126 lines and 23 troubles across the region.

- (20) *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. This proposed change was Item (16) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (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

- (21) *Affected Measures:* B-1

Description of Change: Currently, PMAP does not recognize zero (0) values, which results in records with \$0 in the revenue or adjustment columns not being

included. BellSouth proposes updating the code to recognize and process zero (0) values as follows.

1) \$0 revenue and \$0 adjustments should be aggregated along with the other records for the CLEC based on OCN/ACNA, invoice type, and state. If there is only one record of this type for a CLEC, then the results would be \$0 revenue and \$0 adjustments with a 100% accuracy.

2) \$0 revenue and a value in the adjustments field should be aggregated along with the other records for the CLEC based on OCN/ACNA, invoice type, and State. If there is only one record of this type for a CLEC, then the results would be \$0 revenue and the \$ amount of the adjustments with a zero (0) % accuracy. This proposed change was Item (15) on the Preliminary February 2003 Data Notification filed on December 2, 2002. (RQ2015)

Impact of Change: Minimal. For July data, only one record in the region was omitted.

(22) *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. This proposed change was Item (17) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2718)

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

Database Measurements

(23) *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. This proposed change was Item (18) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2529)

Impact of Change: None.

Third Party Testing

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

(24) *Affected Measures:* O-7 & O-11

Description of Change: This item addresses Florida Exception 204 for "Ordering: Percent Rejected Service Requests" SQM and Florida Exception 205 for "Ordering: Firm Order Confirmation and Reject Response Completeness" SQM. Currently, orders received via EDI that are processed through COG and that go into Jeopardy are incorrectly excluded from these metrics. BellSouth proposes changing the coding to capture these orders. This proposed change was Item (5) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2275)

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

(25) *Affected Measures:* P-4

Description of Change: This item addresses Georgia Exception 162 and Florida Exception 190 for "Provisioning: Order Completion Interval." Under the SQM, BellSouth is required to report average completion interval data for Residence and Business according to the following interval categories: 0 days, 1 day, 2 days, 3 days, 4 days, 5 days, and more than 5 days. BellSouth has determined that Residence and Business orders that are completed within 5 days are being included in both the 5-day and more than 5-day categories. BellSouth proposes changing the code to correct this problem. (RQ1928)

Impact of Change: For November 2002 data, the number of Residence and Business orders completed within more than 5 days would have been reduced by approximately 18%.

(26) *Affected Measures:* P-10A & P-10B (Louisiana only)

Description of Change: This item addresses BearingPoint Louisiana Observation 5 for "Provisioning: Local Number Portability (LNP) - Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution" SQM and for BearingPoint Louisiana Observation 6 for "Provisioning: Local Number

Portability (LNP) - Average Time Out of Service for LNP Conversions” SQM. Currently, the report names posted on the PMAP website do not match the SQM report names. In addition the MSA column is not appearing in the raw data. BellSouth proposes coding changes to address these issues. (RQ2336)

Impact of Change: None.

(27) *Affected Measures:* P-10A (Louisiana only)

Description of Change: This item addresses BearingPoint Louisiana Observation 6 for “Provisioning: Local Number Portability (LNP) - Average Time Out of Service for LNP Conversions” SQM. Currently the report on the PMAP website is being produced with four separate buckets to reflect the benchmark, <=15 minutes, >15 minutes, <=60 minutes, and >60 minutes. BellSouth proposes eliminating the 15 minutes buckets and changing the 60 minutes buckets to, <60 minutes and >=60 minute to agree with the Louisiana SQM. (RQ2814)

Impact of Change: None.

PRELIMINARY MAY 2003 DATA NOTIFICATION

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

Preliminary results	June 21, 2003
Final results	June 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-7*

Description of Change: Currently, the Fatal Reject Column on the Percent Rejected Service Requests is not being populated on data posted to the web. BellSouth proposes to populate this column. (RQ1737)

Impact of Change: Additional data will be reported.

(2) *Affected Measures: O-7, O-11, & O-13*

Description of Change: To determine in which month to include a response for these measures, the inbound timestamp from the source system (LEO, LNP, COG) is being used, rather than the timestamp from the Gateway (EDI, TAG). If these timestamps are in different months, the record is being incorrectly included in the data reported for the month identified by the source system timestamp. BellSouth will change the code to report these LSRs in the month of the inbound Gateway timestamp only. (RQ2105)

Impact of Change: For August data 2002, 580 of 637,038 (0.09%) total LSRs would have been impacted by this change.

(3) *Affected Measures:* O-11

Description of Change: Currently, fatal rejects for LSRs processed by the COG/SGG system, which handles xDSL, UCL-ND, EELs, and UDC products, are erroneously being included in the calculation of this metric. BellSouth proposes to change the coding to ensure that such fatal rejects are not included, consistent with the SQM. (RQ2169)

Impact of Change: Of the 637,038 total LSRs for August 2002 data, BellSouth estimates that approximately 40 LSRs (0.006%) could be fatal rejects.

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

Description of Change: When COG and EDI disagree on whether the response to an LSR was a Completion Notice or a FOC, the record is erroneously being counted as a FOC. In reality, the type of response is unknown, and the record should be ignored, which BellSouth proposes to do. (RQ2274)

Impact of Change: In November 2002 there were 3308 COG records submitted via EDI, of which only one would be impacted by this proposed change.

(5) *Affected Measures:* O-10

Description of Change: Currently, when multiple FOCs are returned for the same LSR, BellSouth is calculating the duration from the return of the last FOC instead of the first FOC. BellSouth proposes calculating the duration from the return of the first FOC. (RQ2614)

Impact of Change: BellSouth is continuing to investigate and will quantify the impact in the near future.

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

Description of Change: Currently, LSRs processed through LEO that are handled by a Service Representative but not "claimed" by that Service Representative are being classified as Fully Mechanized. BellSouth proposes to change the code to classify LSRs as Partially Mechanized if they are handled by Service Representatives whether or not they are "claimed." (RQ2692)

Impact of Change: For October 2002 data, 3927 of 581,892 total LSRs (0.67%) should have been reported as Partially Mechanized rather than Fully Mechanized.

Provisioning Measurements

- (7) *Affected Measures:* P-4 (Louisiana only)

Description of Change: Certain product groups are missing from a cross reference table for this metric, which is causing 2-Wire Analog Loop with Number Portability Design and 2-Wire Analog Loop with Number Portability Non-Design to not be reflected in the total Number Portability line in the report as required by the SQM. BellSouth proposes coding changes to fix this problem. (RQ1670)

Impact of Change: Additional data will be reported.

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

Description of Change: Currently, USOCs associated with certain sub-loops are being incorrectly excluded from the UNE 2-Wire Analog Loop Non-Design product category. BellSouth proposes changing the code to include these records. (RQ1701)

Impact of Change: Only 2 or 3 service order records per month will be impacted by this change.

- (9) *Affected Measures:* P-3 (Florida and Tennessee only)

Description of Change: Currently, for LNP orders when a CLEC subscriber requests a later due date before the original due date arrives, the original date is being erroneously counted as a missed appointment. In fact the due date has not been missed, and BellSouth proposes to change the code to correct this issue. (RQ1719)

Impact of Change: Based upon regional data for January 2003, 145 of the 176 missed LNP appointments would be removed, which would improve BellSouth's performance.

- (10) *Affected Measures:* P-1 (Louisiana only)

Description of Change: Currently, the CLEC Held Order Mean Interval column on the PMAP website is not being populated, although the numerator and denominator for this calculation are provided. BellSouth proposes to provide this data. (RQ1940)

Impact of Change: Additional data will be reported.

- (11) *Affected Measures:* P-4 (Louisiana only)

Description of Change: Currently, the Average Interval (Days) column on the Non-UNE CLEC Region - LA report is not being populated. BellSouth proposes to provide this data. (RQ1960)

Impact of Change: Additional data will be reported.

- (12) *Affected Measures:* P-4A (Florida and Tennessee only)

Description of Change: Currently, an extra day is being improperly included in the interval on wholesale and retail data when the start time and end time occur on different days. BellSouth proposes coding changes to capture the correct interval. (RQ2316)

Impact of Change: Based on September 2002 data the average interval would be reduced by .14 days.

- (13) *Affected Measures:* P-3A (Florida and Tennessee only)

Description of Change: Currently, the CLEC SQM reports list separate data for CLEC caused Missed Appointments. Because CLEC caused Missed Appointments should not be reported separately, BellSouth proposes removing this data from the report. (RQ2423)

Impact of Change: None.

- (14) *Affected Measures:* P-3 (Louisiana only)

Description of Change: For wholesale and retail results, End User Caused Misses are being included in this measure. Because the SQM requires that only BellSouth caused missed appointments be included, BellSouth proposes a coding change to correct this problem. In addition, a Total Missed Appointments Column needs to be added to the report. (RQ2424)

Impact of Change: Based on November 2002 data, the total percentage of missed installation appointments would be reduced by approximately 2%.

- (15) *Affected Measures:* P-4A (Florida only)

Description of Change: Station Worked On (SWO) codes are the section of the completed service order that describes the number of lines worked on, which is

used to determine in which circuit category to report the order (<10, >=10). Some orders do not have a SWO code on the completed order. In the SQM reports, the order is defaulted to the <10 category. However, on the Florida MSS, this default was not implemented, and these records are being erroneously excluded. BellSouth proposes changing the code to include these records. (RQ2460)

Impact of Change: For September 2002, BellSouth's average interval would have increased .15 days and the CLEC average interval would have increased .11 days.

(16) *Affected Measures:* All Provisioning Measures

Description of Change: When a customer has Line Sharing from a CLEC and BellSouth voice service and makes a change to his or her BellSouth voice service, the order is being misidentified as a CLEC order. BellSouth proposes changing the code to identify the order as BellSouth's. (RQ2484)

Impact of Change: For November 2002, 8 records were misidentified as CLEC Line Share records instead of BellSouth records.

(17) *Affected Measures:* P-7A (Florida only)

Description of Change: BellSouth has identified a problem in the Florida MSS product classification associated with the Hot Cut Timeliness report. Currently, all DLC cuts are being classified as integrated, which applies a four-hour window for each coordinated cut. Before applying this four-hour interval, BellSouth should be determining if the cut was integrated DLC and that the CLEC was notified by 10:30 one day prior to the cut. Additionally, BellSouth is counting all DLC cuts in the non-DLC category. BellSouth proposes coding changes to correct these issues. (RQ2584)

Impact of Change: For December 2002 MSS, BellSouth overstated the total volume of non-DLC orders by 205 (or 27.44%) and the volume of DLC orders by 68 (or 21.12%).

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

Description of Change: When a SOC's system error occurs on Non-Dispatched orders that require manual resolution by a BellSouth work center, the order is reflected as a Dispatched order even though no field dispatch is ever made. BellSouth proposes to implement coding changes to correctly identify these orders as non-dispatched. (RQ2687)

Impact of Change: Based on regional data for September 2002, the volume of Dispatch orders would be reduced by approximately 6%, and the Dispatch interval would be reduced by approximately .30 days for both CLEC and BellSouth.

M&R Measurements

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

Description of Change: Currently, the values in the raw data for Missed Appointment, Out of Service Greater Than 24 Hours and Percent Repeat Troubles indicators are 0 or 1, to indicate whether a trouble ticket will be a candidate for the numerator of the above measures. BellSouth proposes changing these values to N (No) or Y (Yes) to simplify the data and make it consistent with other tables in raw data. (RQ733)

Impact of Change: None.

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

Description of Change: Currently, in LMOS if there are multiple trouble reports on the same telephone number during the same reporting period and the customer changes carriers, repeat troubles are misstated in the following case. Assume that a customer changes from a CLEC to BellSouth and then returns to that same CLEC in the same month and has a trouble report during both the first and second instances that the customer is served by that CLEC. Although the second trouble report should be repeat report, currently it is not being reflected as such. In addition, repeat trouble reports that occur within 30 days of the service order completion are not being captured as repeat reports. BellSouth proposes coding changes to correct both issues. (RQ2716)

Impact of Change: Based on November 2002 data, less than 0.5% increase of repeat reports for BellSouth and CLECs.

Billing Measurements

- (21) *Affected Measures:* B-4, B-5, B-6, B-7 & B-8

Description of Change: This change combines Billing raw data files on the web. Currently, there is one file of raw data posted for each of the following metrics: B-4, B-5, and B-6. These three raw data files will be combined into one raw data

file. Also, currently there is one raw data file posted for measure B-7 and one for measure B-8. These two raw data files will be combined into one. (RQ1824)

Impact of Change: None.

- (22) *Affected Measures:* B-9 & B-10 (Florida and Tennessee only)

Description of Change: BellSouth proposes adding CO_NAME field to web raw data in order to provide the company description as it is displayed on the web reports. (RQ2046)

Impact of Change: None

Database Measurements

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

Description of Change: The "Number of Updates" and the "Average Interval" on the CLEC Regional SQM report are being calculated incorrectly. Currently, the "Number of Updates" (number of days in which there was a batch update) is being derived by determining the number of days there was an update for that OCN/ACNA in each state, and then summing the number of updates from each state. The "Number of Updates" should be the number of distinct days in which an update occurred for that OCN/ACNA, instead of the sum of the number of days from each state. Therefore, it should never be more than the number of days in the month. For example, if an OCN/ACNA had an update in Alabama, Florida, Georgia, and Tennessee every day in the month of March, this would be 31 updates, not 124, because all the updates were made during the same update process. In addition, BellSouth is currently averaging the state averages to determine the regional average, which is incorrect. BellSouth proposes to implement coding changes to address these issues. (RQ1888)

Impact of Change: Based on a review of four month's data for six OCN/ACNAs, the "Average Interval" impact is .99 hours increase in the interval for Directory Assistance and .58 hours increase for LIDB.

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March 4, 2003

DELIVERED BY HAND

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

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

Dear Mr. McAlister:

On March 3, 20003, BellSouth Telecommunications, Inc. ("BellSouth") filed its Notification Report for the April 2003 data month and a Preliminary Notification Report for the data month of May 2003. BellSouth has since discovered that there were three (3) minor errors in the April 2003 Notification Report that BellSouth would like to bring to the attention of the Commission and the parties.

First, Item No. 3 described a proposed change to Measure O-11. However, the impact of this change was inadvertently omitted, and the notice should have reflected that the proposed change would have no impact on performance results.

Second, Item No. 5 described a proposed change to Measure O-9 and indicated that the change was related to Item No. 25, which addresses two (2) Florida exceptions. This reference was incorrect and should have referred to Item No. 24 on the April Notification Report.

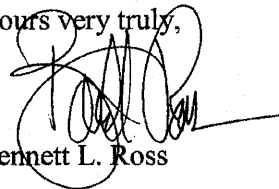
Finally, Item No. 8 described a proposed change to Measures O-3, O-4, and O-5. The impact of this change would be a .02% reduction for UNE and Aggregate flow through rather than "02%" as indicated in the original notification.

Mr. Reece McAlister
March 4, 2003
Page 2

BellSouth apologizes for these errors, and enclosed for filing please find an original and eighteen (18) copies, as well as an electronic version, of this letter. 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,

A handwritten signature in black ink, appearing to be "B. Ross", written over a circular stamp or seal.

Bennett L. Ross

BLR:nvd
Enclosures

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)

482586

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2003, 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
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Washington, DC 20006

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

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

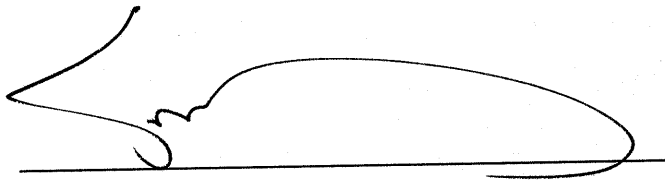
Jon E. Hastings, Esquire
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Dana Shaffer, Esquire
XO Communications, Inc.
105 Malloy Street
Nashville, TN 37201

A handwritten signature in black ink, appearing to be "Dana Shaffer", written over a horizontal line.