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BellSouth Telecommunications, Inc.

333 Commerce Street

Suite 2101

Nashville, TN 37201-3300

guy.hicks@bellsouth.com

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Guy M. Hicks

General Counsel

T.R.A. DOCKET ROOM

615 214 6301

Fax 615 214 7406

June 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 July 2003 data month and a Preliminary Notification Report for the data month of August 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



BellSouth Telecommunications, Inc.
Legal Department
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, GA 30319-5309

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel - Georgia

404 986 1718
Fax 404 986 1800

June 2, 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 July 2003 data month and a Preliminary Notification Report for the data month of August 2003. These proposed changes will be discussed at the June 6, 2003 industry conference call.

There are four additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its March 2003 Data Notification filed on February 3, 2003, BellSouth provided notice of changes that were being made in anticipation of Encore Release 12.0 (Item 1). Although BellSouth expected these changes to be implemented with March 2003 data, limited changes associated with the availability of LAN to LAN test data will be made with May 2003 data. Currently, no CLEC is utilizing the LAN to LAN interface that was implemented with this release. Additional changes may be required when a CLEC begins utilizing this interface.

Second, in its November 2002 Data Notification filed on October 1, 2002, BellSouth provided notice of a coding change to properly assign state identification codes to designed orders in North and South Carolina. This change, which was Item No. 1 on the November 2002 Data Notification, was not implemented correctly, and BellSouth will be making additional coding changes with August 2003 data to address this problem.

Mr. Reece McAlister
June 2, 2003
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The remaining two issues that BellSouth is bringing to the attention of the Commission and the parties are those that have been discovered with the initial implementation of the Georgia Order dated January 22, 2003. For measures SA-5, "Days Late" report and SA-7 "Past Due Circuits," BellSouth corrected the interval labels on the report to align with the intervals outlined in the SQM document for April 2003 data. This correction to label intervals had no impact on the data.

For the "Percent Cancellations After FOC Due Date" portion of measure SA-7, "Past Due Circuits," BellSouth discovered that it was using the current month's past due orders instead of the prior month's past due orders for the base of this calculation. BellSouth corrected the denominator of this calculation to use orders past due at the end of the previous reporting period consistent with the calculation in the SQM document for the reporting of April 2003 data. This had no impact to the results for March data because there were no cancellations after the FOC Due Date.

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

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)

491758/491829/491830

PROPOSED JULY 2003 DATA NOTIFICATION

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

Preliminary results August 21, 2003
Final results August 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, 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:* PO-2 & O-8, O-9, O-14 & O-15

Description of Change: Currently, PMAP is excluding holiday hours from the calculation of Fully Mechanized LSR durations. BellSouth proposes to correct the code to include these hours in the Fully Mechanized LSR duration calculation. This proposed change was Item (1) on the Preliminary July 2003 Data Notification filed on May 1, 2003. (RQ3072)

Impact of Change: Minimal. As an example, on Christmas Day 2002, 1208 FOCs and 550 Rejects would have been affected by this change. With this proposed change, none of the FOCs and 27 of the Rejects missed the benchmark, and O-8 performance would have been reduced by 0.04%.

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

Description of Change: Currently, Flow-Through references a look-up table outside of PMAP to determine valid and test company codes. BellSouth proposes to change the code to reference the look-up table in the PMAP Warehouse. This proposed change was Item (2) on the Preliminary July 2003 Data Notification filed on May 1, 2003. (RQ3435)

Impact of Change: None.

Provisioning Measurements

- (3) *Affected Measures:* P-9, P-10A, P-10B, P-10C, & P-11 (Louisiana only)

Description of Change: The table used to determine the correct MSA for these measures is obsolete. BellSouth proposes using the same table to determine MSA for these measures that is used for other Provisioning measures. This proposed change was Item (3) on the Preliminary July 2003 Data Notification filed on May 1, 2003. (RQ2866)

Impact of Change: For the month of January 2003, 310 of the 2734 LNP trigger transactions had unknown MSAs. This change would have reduced the number of transactions with unknown MSAs in January to 6.

- (4) *Affected Measures:* P-13 & P-13C

Description of Change: Currently, the table used to determine the State code for these measures is obsolete. BellSouth proposes using the same table to determine State for these measures that is used for other Provisioning measures. This proposed change was Item (5) on the Preliminary July 2003 Data Notification filed on May 1, 2003. (RQ3067)

Impact of Change: Based on February 2003 data, there will be a 5.01% increase in the region base volume for P-13, and a 6.35% increase in the region base volume for P-13C.

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

Description of Change: When an order entry system (e.g., RNS, ROS, DOE, SONGS) or SOCS failure occurs, orders are entered into SOCS after the failure is resolved. However, the physical work may be completed before the service order is issued.. If the date that the service order was issued is later than the completion date, BellSouth is currently reporting an OCI interval of 0 days for these orders instead of .33 days as required by the SQM. BellSouth proposes to implement a coding change to correct this problem. This proposed change was Item (6) on the Preliminary July 2003 Data Notification filed on May 1, 2003. (RQ3185)

Impact of Change: 1195 of 2,929,179 (.004%) Retail and Wholesale records for February 2003 had a '0' duration.

Collocation Measurements

(6) *Affected Measures:* C-1, C-2 & C-3

Description of Change: Currently, the Collocation reports are produced manually. BellSouth proposes mechanizing these reports. (RQ2332)

Impact of Change: None to reported results.

491829

PRELIMINARY AUGUST 2003 DATA NOTIFICATION

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

Preliminary results September 21, 2003
Final results September 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, O-8, O-9 & O-11

Description of Change: Reports for Local Interconnection Trunks for these measures are produced manually. BellSouth proposes to mechanize these reports in PMAP. (RQ3203)

Impact of Change: None.

- (2) *Affected Measures:* O-7, O-8, O-9, and O-11

Description of Change: Currently, PMAP is reporting based on the first inbound timestamp for some LSRs received from TAG. The appropriate timestamp to use, as pointed out in response to GA Exception 181, is the last inbound timestamp. Based on February 2003 data, the average change in duration for those LSRs having multiple timestamps was 11 seconds. BellSouth proposes to change the PMAP code to use the last inbound timestamp. (RQ 3452)

Impact of Change: For FOC data reported in February 2003 there would be no change to the reported results.

(3) *Affected Measures:* PO-1

Description of Change: Currently, there is a discrepancy between the SQM and the MSS for this measure. The discrepancy is due to the assignment of duration for the MSS, which incorrectly calculates the benchmark as $0 \leq 2.9999$ days. Because the benchmark is less than or equal to 3 days, BellSouth proposes to change the MSS code to report LSRs that have a duration of exactly 3 days within the benchmark interval and to not count the LSR as a miss. (RQ3629)

Impact of Change: For March 2003 data, one of 76 LSRs (1.35%) was reported within the benchmark of $0 \leq 3$ days in the SQM, but not in the MSS.

Provisioning Measurements

(4) *Affected Measures:* P-4

Description of Change: Currently, retail orders and some CLEC orders are being included in this measure, even though the customer has caused an extended interval due to an end user caused missed appointment. Consistent with the SQM, BellSouth proposes excluding those orders where the end user has extended the completion interval. (RQ3457)

Impact of Change: In March 2003 for BellSouth Retail in Georgia, this measure reflected extended intervals for 1.15% of the orders. For CLECs, extended intervals were reported for .68% of the orders.

(5) *Affected Measures:* SA-4

Description of Change: Currently, the percentages for "On-time Performance to FOC Due Date with CNR Consideration" and "On-time Performance to FOC Due Date Without CNR Consideration" are not being calculated correctly. BellSouth proposes correcting the calculation methodology for these measures. (RQ3683)

Impact of Change: The % On-Time Performance with CNR Consideration will report a combination of all orders completed on time rather than discrete elements as are currently portrayed.

M & R Measurements

- (6) *Affected Measures:* All M&R Measures

Description of Change: Currently, PMAP is misclassifying some DS1 services as EEL products. BellSouth proposes a coding change to begin using a class of service USOC as a filter to better distinguish EELs from DS1 services. (RQ3403)

Impact of Change: Based on February 2003 data the Customer Trouble Report Rate for UNE Combo Other would increase from 4.26% to 4.45%.

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

Description of Change: For the retail analog "ADSL Provided to Retail", BellSouth currently includes the Troubles reported on the data or "virtual" portion of the circuit as well as the voice or "physical" portion of the circuit. However, troubles received on wholesale circuits only deal with the physical line troubles, since all virtual trouble issues should be tested and resolved by the CLEC. This causes a mismatch between the type of data reported for retail vs. wholesale in the durations of the BellSouth retail and CLEC DSL troubles. BellSouth proposes excluding from the ADSL retail analog any trouble closed out to a virtual portion of the circuit. (RQ3344)

Impact of Change: Based on February 2003 data, the Customer Trouble Report Rate is reduced from 2.74% to 2.4%. Maintenance Average Duration for ADSL provided to retail will increase by an average of .89 hours. Repeat Report Rate will be reduced by an average of .003% across all states for ADSL provided to retail.

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

Description of Change: Currently, some CLLI codes are not being recognized for wire center determination. BellSouth proposes incorporating a new table into the data model for wire center determination. (RQ3417)

Impact of Change: Minimal. The Customer Trouble Report Rate will increase 0.19% region wide.

PARTIES OF RECORD

Kristy R. Holley, Division Director
Consumers' Utility Counsel
47 Trinity Avenue, S.W.
4th Floor
Atlanta, GA 30334-4600
404-656-3982 (o)
kristy.holley@cuc.oca.ga.us

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309
404-810-7175 (o)
sockleberry@att.com

Charles V. Gerkin Jr.
Attorney at Law
Suite 610 – PMB 307
4135 LaVista Road
Tucker, GA 30085-5003
770-414-4206 (o)
charles.gerkin@attbi.com

Jeremy D. Marcus
Blumenfeld & Cohen
[Co-Counsel for Rhythm, aka ACI Corp.]
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)
jeremy@technologylaw.com

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Suite 8
Atlanta, GA 30345
404-321-5368 (o)
jsilk@gta.org

Newton M. Galloway
Smith, Galloway, Lyndall & Fuchs
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229
770-233-6230 (o)
ngalloway@sglf-law.com

Walt Saprnov
Gerry & Saprnov, LLP
Three Ravinia Drive
Suite 1455
Atlanta, GA 30346-2131
770-395-9100 (o)
info@gstelecomlaw.com

Frank B. Strickland
Strickland Brockington & Lewis
[Counsel for e.spire]
Midtown Proscenium – Suite 2000
1170 Peachtree Street. N.E.
Atlanta, GA 30309
404-885-5741 (o)
fbs@sbllaw.net

William Bradley Carver
Alston & Bird LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
404-881-7000 (o)
bcarver@alston.com

Daniel S. Walsh
Attorney General Office
Department of Law–State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1330
404-657-2204 (o)
dan.walsh@law.state.ga.us

Stephen S. Melnikoff
General Attorney – Regulatory Law Office
U. S. Army Legal Services Agency
Department of the Army
901 N. Stuart Street, Suite 700
Arlington, VA 22203-1837
703-696-1643 (o)
stephen.melnikoff@hqda.army.mil

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346
770-901-8800 (o)
pcanfield@dlalaw.com

Anne E. Franklin
Arnall Golden & Gregory, LLP
[Counsel for Broadslate, NorthPointe]
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
404-873-8536 (o)
anne.franklin@agg.com

D. Mark Baxter
Thomas M. Browder, III
Stone & Baxter, LLP
577 Mulberry Street
Suite 1111
Macon, GA 31201
478-750-9898 (o)
mbaxter@stoneandbaxter.com
tbrowder@stoneandbaxter.com

David I. Adelman, Esquire
Charles B. Jones III, Esquire
C. Christopher Hagy, Esquire
Hayley B. Riddle, Esquire
Sutherland, Asbill & Brennan LLP
999 Peachtree Street, NE
Atlanta, GA 30309-3996
(404) 853-8206 (o)
[Counsel for ITC^DeltaCom, WorldCom]
diadelman@sablalaw.com
cbjones@sablalaw.com
hbriddle@sablalaw.com

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216
404-885-3402 (o)
charles.palmer@troutmansanders.com

Nanette S. Edwards
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
256-382-3856 (o)
nedwards@itcdeltacom.com

William R. Atkinson
Sprint Communications Company L.P.
3065 Cumberland Boulevard
Mailstop GAATLD0602
Atlanta, GA 30339
404-649-4882 (o)
bill.atkinson@mail.sprint.com

Genevieve Morelli
Andrew M. Klein
Kelley Drye & Warren LLP
[Counsel for KMC Telecom]
1200 Nineteenth Street, N.W.
Washington, DC 20036
202-877-1257 (o)
gmorelli@kelleydrye.com
aklein@kelleydrye.com

Mark M. Middleton, Esquire
Mark M. Middleton, P.C.
4231 Quail Ridge Way
Norcross, GA 30092-1318
404-806-0808 (o)
[Counsel for CTAG]
mark@middletonlaw.net

Charles A. Hudak
Friend, Hudak & Harris, LLP
Three Ravinia Drive
Suite 1450
Atlanta, GA 30346-2131
770-399-9500 (o)
chudak@fh2.com

Dulaney L. O'Roark III, Esquire
WorldCom, Inc.
Concourse Corporate Center Six
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
[Counsel for WorldCom, Inc.]
770-284-5498 (o)
de.oroark@wcom.com

Eric J. Branfman
Swidler & Berlin
3000 K Street, N.W.
Suite 300
Washington, DC 20007
202-945-6940 (o)
ebanfman@swidlaw.com

Charles E. Watkins, Esquire
Senior Counsel
Covad Communications Company
1230 Peachtree Street, N.E., 19th Floor
Atlanta, GA 30309
404-942-3492 (o)
gwatkins@covad.com

Rose Mulvany Henry, Esquire
Birch Telecom of the South, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108
[Counsel for Birch Telecom]
816-300-3000 (o)
rmulvany@birch.com

CERTIFICATE OF SERVICE

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

☐ Hand
☐ Mail
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Michael Hopkins, Esquire
McKenna & Cuneo
1900 K Street, NW
Washington, DC 20006
mike_hopkins@mckennacuneo.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

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

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

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

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

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

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Dana Shaffer, Esquire
XO Communications, Inc.
105 Malloy Street
Nashville, TN 37201
dshaffer@xo.com

