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Guy M. Hicks
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February 3, 2004

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, 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 Tate:

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 its *Eleventh Notice of Corrective Action Plans* filed with the Georgia Public Service Commission on February 2, 2004. This *Notice* is 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 2, 2004

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:

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Eleventh Notice of Filing Corrective Action Plans in the above-referenced docket. I would appreciate your filing this document and returning the two (2) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Yours very truly,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Parties of Record (via electronic mail)

524987/523989

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

BELLSOUTH TELECOMMUNICATIONS, INC.'S ELEVENTH NOTICE OF FILING CORRECTIVE ACTION PLANS

I. INTRODUCTION

Pursuant to the Commission's January 12, 2001, November 14, 2002 and January 22, 2003 Orders, BellSouth Telecommunications, Inc. ("BellSouth") respectfully files its eleventh corrective action plans, where applicable, for those performance measures for which BellSouth failed to meet the applicable benchmark or retail analogue twice in the past three consecutive months (September, October, and November 2003). BellSouth's filing identifies each of the performance measures and sub-metrics at issue, identifies the months in which the applicable benchmark or retail analogue was not met, and provides an overview of the results of BellSouth's root cause analysis and proposed corrective action plans, where applicable.

SECTION 1: OPERATIONS SUPPORT SYSTEMS (OSS)

OSS-1: RESPONSE INTERVAL – CLEC (LENS) (PRE-ORDERING)

CRSECSRL / Region / ROS (D.1.3.5.2) (September & November)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system CRSECSRL (Customer Record Information System) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and

for BellSouth retail using ROS may be relatively minor (based on current data, the differential is approximately 0.1 seconds), but a detailed review of this system has not indicated any systemic issues affecting performance. The average response interval for the three months of September, October and November 2003 shows that the CLECs received a 2.64 second response interval compared with the retail analogue of 2.61 seconds. Such slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner.

COFFI / Region / RNS (D.1.3.6.1) (September, October & November)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system COFFI (Central Office Feature File Interface) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using RNS may be relatively minor (based on current data, the differential is approximately 0.1 seconds), but a detailed review of this system has not indicated any systemic issues affecting performance. The average response interval for the three months of September, October and November 2003 shows that the CLECs received a 2.64 second response interval compared with the retail analogue of 2.55 seconds. Such slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner.

OSS-1: RESPONSE INTERVAL – CLEC (TAG) (PRE-ORDERING)

ATLAS / Region / RNS (D.1.4.5.1) (September & October)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system ATLAS (Application for Telephone Number Load Administration System) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using RNS may be relatively minor (for

the two months that did not meet the retail comparison the differential was approximately 0.25 seconds), but a detailed review of this system has not indicated any systemic issues affecting performance. The average response interval for the three months of September, October and November 2003 shows that the CLECs received a 2.78 second response interval compared with the retail analogue of 2.63 seconds. Such slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner. BellSouth met the retail analogue comparison in November for this sub-metric.

ATLAS / Region / ROS (D.1.4.5.2) (September, October & November)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system ATLAS (Application for Telephone Number Load Administration System) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (for the three months that did not meet the retail comparison, the differential was approximately 0.34 seconds), but a detailed review of this system has not indicated any systemic issues affecting performance. The average response interval for the three months of September, October and November 2003 shows that the CLECs received a 2.78 second response interval compared with the retail analogue of 2.44 seconds. Such slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner.

TAG / Region / RNS (D.1.4.7.1) (September & October)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system CRIS (Customer Record Information System) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (based on current data, the differential is

approximately 1.7 seconds), but a detailed review of this system has not indicated any systemic issues affecting performance. The average response interval for the three months of September, October and November 2003 indicates that the CLECs received a faster response interval than BellSouth retail – 3.81 seconds for the CLECs compared to 2.80 seconds for BellSouth retail. Such slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner. BellSouth met the retail analogue comparison in November for this sub-metric.

TAG / Region / ROS (D.1.4.7.2) (September & October)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system CRIS (Customer Record Information System) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (for the two months that did not meet the retail comparison, the differential was approximately 1.4 seconds), but a detailed review of this system has not indicated any systemic issues affecting performance. The average response interval for the three months of September, October and November 2003 shows that the CLECs received a 3.81 second response interval compared with the retail analogue of 2.60 seconds. As a result, slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner. BellSouth met the retail analogue comparison in November for this sub-metric.

OSS-4: RESPONSE INTERVAL (MAINTENANCE & REPAIR)

DLR / <= 4 sec. / Region (D.2.4.3) (September & October)

DLR / <= 10 sec. / Region (D.2.5.3) (September, October & November)

DLR / > 10 sec. / Region (D.2.6.3) (September, October & November)

BellSouth's root cause analysis has determined that the slight differences in response interval for the CLECs and BellSouth retail accessing the Detailed Line Record (DLR) system is primarily attributable to the different uses to which the system is put. In addition, with the replacement of DLR by the CRIS legacy system, the volume of CLEC queries has decreased dramatically, which makes it difficult for BellSouth to implement any system enhancements that would effectively improve overall performance.

LMOSupd / <= 4 sec. / Region (D.2.4.5) (September, October & November)

LMOSupd / <= 10 sec. / Region (D.2.5.5) (September, October & November)

LMOSupd / > 10 sec. / Region (D.2.6.5.) (September, October & November)

While results for these sub-metrics vary between the CLECs and BellSouth retail, these results reflect that the significant majority of CLEC transactions are being rapidly returned. For September through November 2003, over 97% of CLEC transactions were returned in 4 seconds or less, and more than 99.7% of CLEC transactions were returned in 10 seconds or less. Given such performance, any slight differences with BellSouth retail should not impede a CLEC's ability to secure information in a timely manner.

NIW / <= 10 sec. / Region (D.2.5.11) (September & November)

NIW / > 10 sec. / Region (D.2.6.11) (September & November)

This measure captures the legacy system access times for Maintenance and Repair Operational Support Systems ("OSS"). BellSouth reports its response interval performance based on the percentage of responses received in four seconds or less, the percentage of responses received in ten seconds or less, and the percentage of responses received in more than ten seconds. The timeliness of BellSouth's responses cannot be gauged simply by referring only

to the "four seconds or less" interval, since looking at only one of these intervals can be misleading. With respect to the NIW (Network Information Warehouse) legacy system, over 75% of all responses were received in less than 4 seconds for the CLECs, which exceeded the retail analogue comparison. Also, the CLECs and BellSouth retail received over 98% of all responses for this system in less than 10 seconds during the period. Thus, when viewed as a whole, the performance data reflect that CLECs are receiving timely responses from the NIW legacy system, notwithstanding some slight differences in the timeliness of responses received by CLECs and BellSouth retail.

SECTION 2: ORDERING

O-2: ACKNOWLEDGEMENT MESSAGE COMPLETENESS

EDI (F.12.2.1) (September, October & November)

BellSouth's performance with respect to these sub-metrics exceeded 99.99% in September through November 2003, although it fell short of the Commission's 100% benchmark. As BellSouth has previously pointed out, BellSouth has no margin of error with a 100% benchmark, because the failure to deliver a single acknowledgement via EDI or TAG will cause BellSouth to miss this measure. In September and October BellSouth failed to deliver 1 acknowledgement and in November BellSouth failed to deliver acknowledgements on only 3 of the 332,579 messages received via EDI. BellSouth continues to try to resolve the relatively small number of failed acknowledgements (5 in 3 months) in EDI.

O-3: PERCENT FLOW-THROUGH SERVICE REQUESTS (SUMMARY)

Business / Region (F.1.1.4) (September, October & November)

The business flow-through rate continues to be below the 90% objective, although progress continues to be made. BellSouth averaged over 86% for business flow-through during the three-month period of September through November 2003. However, as BellSouth has explained before, business LSRs are more complex than the typical LSRs and, as a result, there is a greater probability for error. For example, an LSR requesting 10 lines with series completion hunting that are located over multiple floors and have a variation of features on the lines presents many more opportunities for system mismatches than one that adds just lines and features. This complexity coupled with the relatively low volumes of business LSRs make it very difficult for BellSouth to meet the Commission's 90% benchmark for this sub-metric.

UNE-Other / Region (F.1.1.7) (September & November)

While BellSouth did not meet the 85% benchmark for this sub-metric in September and November, it averaged 84.42% (31,489 of 37302) for the three-month period, which was 218 LSRs below the benchmark. BellSouth continues to work to meet the benchmark. BellSouth met the benchmark for this sub-metric in October 2003.

LNP / Region (F.1.3.1) (September, October & November)

LNP flow-through results were skewed downward due to a defect discovered in late August 2003 that inhibits fully mechanized FOCs from being sent for requests in the three (3) states where a facility check is required, even though service orders were mechanically generated according to process. Upon discovery of the defect, BellSouth implemented a manual workaround that allowed the Local Carrier Service Centers (LCSC) to return a mechanized FOC and subsequently implemented a mechanized workaround to return FOCs. On December 7, 2003, BellSouth implemented a code change to address this problem.

Approximately 1,200 LSRs were impacted by this defect in October. The low volume of total requests in this segment – coupled with the relative high number of segment requests affected by this defect – magnified the impact on segment performance. The LNP segment represents only 1.56% of total mechanized LSR volume in October. BellSouth met the 85% benchmark with December 2003 data.

O-8: REJECT INTERVAL

Loop & Port Combinations / Electronic (B.1.4.3) (September & October)

Other Design / Electronic (B.1.4.14) (September & October)

Other Non-Design / Electronic (B.1.4.15) (September & October)

For these sub-metrics for which BellSouth did not meet the benchmark, BellSouth has conducted a detailed root cause analysis of the process for electronic rejects. The root cause analysis indicates the issues previously identified have been resolved. However, BellSouth did not meet the benchmark in September and October due to delays experienced in the processing of EDI firm orders. A technical team was formed to identify and resolve the problems, and several of the team's recommendations already have been implemented to improve processing time. BellSouth met all three of these sub-metrics in November 2003.

Resale Residence / Partial Electronic (A.1.7.1) (September & November)

xDSL / Partial Electronic (B.1.7.5) (October & November)

Line Sharing / Partial Electronic (B.1.7.7) (September, October & November)

2-Wire Analog Loop Design / Partial Electronic (B.1.7.8) (September, October & November)

2-Wire Analog Loop Non Design / Partial Electronic (B.1.7.9) (September & October)

2-Wire Analog Loop w/LNP Design / Partial Electronic (B.1.7.12) (September & October)

2-Wire Analog Loop w/LNP Non-Design / Partial Electronic (B.1.7.13) (September, October & November)

Other Design / Partial Electronic (B.1.7.14) (September, October & November)

Other Non Design / Partial Electronic (B.1.7.15) (September & October)

LNP Standalone / Partial Electronic (B.1.7.17) (September, October & November)

To address the remaining LSRs that were not returned within the 7-hour benchmark, BellSouth conducted a detailed raw data analysis that has revealed three areas associated with the mechanized portion of the partially mechanized LSRs:

First, BellSouth experienced delays in processing LSRs submitted via the EDI system. During September and October 2003, this problem was corrected. The EDI CPUs and hard drives were replaced as well as additional CPU capacity installed. Also, additional pathways between the EDI translator and down stream Legacy systems were added. Finally, the electronic processing of certain administrative and archival activities was removed from the EDI translator to reduce overall processing time of the LSRs.

Second, some LSRs experience delays in processing because of a work procedure in the LCSC. BellSouth has determined that some LSRs were not being scheduled for handling by the service representatives in a timely manner. A change to the LCSC work procedures will be implemented in first quarter of 2004 and will be monitored on a monthly basis to ensure that the partial mechanized LSRs are in compliance with the 7-hour benchmark.

Third, LSRs are dropping out for manual handling because of an error discovered after a FOC was returned to the CLEC. There are instances where an error is discovered as the Service Order begins to process through the provisioning systems. Due to the way the ordering and provisioning systems interact, it is not feasible for the order processing systems to query the provisioning system to detect these errors, prior to sending the FOC. Thus, when the error is detected as the Service Order begins to process, the reject is returned to the CLEC, but the time interval is measured from when the LSR was first received, resulting in an unusually long reject interval. There are only small quantities of cases where the types of conditions that cause BellSouth to miss the standard occur, averaging about 65 per month. These volumes make it extremely difficult to duplicate the event that caused the problem, so that the problem can be corrected. Importantly, the small volume of misses indicates that performance is not having a significant adverse impact on CLECs.

O-9: FIRM ORDER CONFIRMATION TIMELINESS

Combo Other / Electronic (B.1.9.4) (September, October & November)

EELs / Electronic (B.1.9.18) (September, October & November)

Line Sharing / Electronic (B.1.9.7) (September & October)

2-Wire Analog Loop w/LNP Design / B.1.9.12) (September & October)

BellSouth did not meet the benchmark for these sub-metrics due to delays experienced in the processing of EDI firm orders. A technical team was formed to identify and resolve the problems, and several of the team's recommendations already have been implemented to improve processing time. The EELs/Combo Other sub-metric missed the sub-metric in November but only had a total of 14 LSRs returned. Both of the other sub-metrics met the November comparison.

Combo Other / Partial Electronic (B.1.12.4) (September, October & November)

xDSL / Partial Electronic (B.1.12.5) (September, October & November)

Line Sharing / Partial Electronic (B.1.12.7) (September, October & November)

2-Wire Analog Loop Design / Partial Electronic (B.1.12.8) (September, October & November)

2-Wire Analog Loop Non Design / Partial Electronic (B.1.12.9) (September, October & November)

2-Wire Analog Loop w/LNP Design / Partial Electronic (B.1.12.12) (September, October & November)

2-Wire Analog Loop w/LNP Non-Design / Partial Electronic (B.1.12.13) (September, October & November)

Other Design / Partial Electronic (B.1.12.14) (September, October & November)

Other Non Design / Partial Electronic (B.1.12.15) (September, October & November)

LNP Standalone / Partial Electronic (B.1.12.17) (September, October & November)

EELs / Partial Electronic (B.1.12.18) (September, October & November)

To address the remaining LSRs that were not returned within the 7-hour benchmark, BellSouth conducted a detailed raw data analysis that has revealed three areas that are in the process of being corrected. Two of these areas – delays in processing LSRs due to EDI hardware and capacity issues as well as delays associated with work procedures in the LCSC – were address above in connection with Measure O-8: Reject Interval. In addition, BellSouth has discovered that some LSRs experience delays in processing because of an abnormal time delay within the gateway systems (EDI, TAG) sending the FOC. A system problem has been identified in the data and is being investigated to determine the cause of the delay.

Resale Centrex / Manual (A.1.13.5) (October & November)

BellSouth met 24 of the 27 FOCs that were submitted during the period of September, October and November 2003. In October, BellSouth met 15 of the 16 FOCs and 8 of 10 in November and 1 of 1 in September. However, with such a small volume of orders in this sub-metric, BellSouth basically must meet the benchmark for nearly 100% of the orders, which is a challenging task.

O-10: SERVICE INQUIRY WITH LSR FIRM ORDER CONFIRMATION RESPONSE TIME MANUAL

xDSL (F.3.1.1) (September, October & November)

BellSouth met 15 of 19 inquiries within the 4-business day benchmark in September, 14 of 15 in October and 7 of 10 inquiries within the benchmark in November 2003. However, to

meet the 95% benchmark, all 19, 15 and 10 inquiries would have to be met in each month, respectively, which is a challenging task.

Local Interoffice Transport (F.3.1.2) (September, October & November)

BellSouth met 8 of 9 inquiries within the 4-business day benchmark in September, 15 of 20 in October and 9 of 10 inquiries within the benchmark in November 2003. With a 95% benchmark, practically no misses were allowed for this sub-metric in any month. BellSouth continues to focus it efforts to meet the Commission's benchmark for this sub-metric.

O-11: FIRM ORDER CONFIRMATION AND REJECT RESPONSE COMPLETENESS

Combo Other / Electronic (B.1.14.4) (September, October & November)

xDSL / Electronic (B.1.14.5) (September, October & November)

ISDN Loop / Electronic (B.1.14.6) (September, October & November)

LNP Standalone / TAG / Electronic (B.1.14.17.2) (September & October)

For these sub-metrics for which BellSouth did not meet the benchmark, BellSouth has conducted a detailed root cause analysis of the process for electronic FOCs and Rejects. A technical team was formed to identify and resolve the problems, and several of the team's recommendations already have been implemented. While improvement was shown in November, BellSouth continues to work on these sub-metrics to meet the 97% benchmark. As stated in previous filings, one of the major issues that affect this measure are numerous versions of the same LSR being filed by the CLEC within minutes and LSRs received at the end of the month with the FOC or Reject returned in the following month. When a CLEC submits multiple versions of an LSR within minutes, only the last LSR receives a response. All previous versions do not receive a response and therefore are counted as "missed" responses.

Combo Other / Partial Electronic (B.1.15.4) (September, October & November)

BellSouth returned a FOCs and/or Reject for 709 of the 892 LSRs submitted during the period from September through November 2003 for this sub-metric. For the LSRs that did not show either a FOC or Reject being returned during this period, BellSouth has conducted a detailed root cause analysis and has determined that three issues resulted in this sub-metric not meeting the 97% benchmark. First, LSRs were entered into the Service Order Control System (SOCS) with a transposed PON. With an incorrect PON, the LSR would not have received a FOC. The service representatives will be instructed to verify the PON entered into SOCS against the PON included on the LSR. Second, some of the rejects that were returned in the month following the LSR submission were incorrectly omitted from the numerator of the calculation for this measure. This issue was included as item 2 in the January 2003 data notification (RQ4601) filed with this Commission on December 1, 2003. Finally, LSRs are being entered into the Work Information Manager (WIM) system but are sitting in queue status and not downloading to initiate the FOC to the CLEC. The WIM is an interface program used by the LCSC to abbreviate the manual effort required by the service representatives to enter data into the ordering systems. BellSouth is reviewing this issue to determine why these LSRs are not being processed correctly.

xDSL /Partial Electronic (B.1.15.5) (September, October & November)

Local Interoffice Transport / Manual (B.1.16.2) (October & November)

Loop & Port Combinations / Manual (B.1.16.3) (September & October)

Combo Other / Manual (B.1.16.4) (October & November)

xDSL / Manual (B.1.16.5) (October & November)

2-Wire Analog Loop Design / Manual (B.1.16.8) (September & October)

2-Wire Analog Loop w/INP Design / Manual (B.1.16.10) (October & November)

2-Wire Analog Loop w/LNP Design / Manual (B.1.16.12) (October & November)

Other Design / Manual (B.1.16.14) (September & October)

INP Standalone / Manual (B.1.16.16) (September, October & November)

The majority of these sub-metrics continue to perform at a level of 90% or better, with many having a relatively small number of transactions. As stated in previous filings, one of the major issues that affect this measure are numerous versions of the same LSR being filed by the CLEC within minutes and LSRs received at the end of the month with the FOC or Reject returned in the following month. When a CLEC submits multiple versions of an LSR within minutes, only the last LSR receives a response. All previous versions do not receive a response and therefore are counted as "missed" responses. BellSouth continues to review the data for the sub-metrics that did not meet the 97% benchmark.

Resale Business / Manual (A.1.16.2) (September, October & November)

Resale Design (Specials) / Manual (A.1.16.3) (September & November)

Resale PBX / Manual / Manual (A.1.16.4) (October & November)

Resale Centrex / Manual (A.1.16.5) (September & November)

BellSouth returned FOCs and Rejects for 95% or higher of the LSRs that were submitted during the period of September, October and November 2003 for all of these sub-metrics. The major issue causing BellSouth to miss the 97% benchmark was due to the CLECs submitting a change to the previous LSR before the initial response and been provided. BellSouth only responds to the latest version at the time of the manual response.

SECTION 3: PROVISIONING

P-2B: PERCENTAGE OF ORDERS GIVEN JEOPARDY NOTICES

Combo Other / Electronic (B.2.5.4) (September & October)

UNE ISDN / Electronic (B.2.5.6) (September & October)

2W Analog Loop Non-Design / Electronic (B.2.5.9) (September & October)

2W Analog Loop w/LNP Non-Design / Electronic (B.2.5.13) (September & October)

Digital Loop / < DS1 / Electronic (B.2.5.18) (September & October)

Digital Loop / >= DS1 / Electronic (B.2.5.19) (September & October)

BellSouth uses the "Jeopardy" notice to identify potential facility shortages that could delay installations. BellSouth continues to resolve facility issues promptly, as evidenced by the fact that BellSouth met or exceeded the retail analogue comparison for Missed Installation Appointments for all of these sub-metrics.

P-4A: AVERAGE COMPLETION INTERVAL (OCI) AND ORDER COMPLETION INTERVAL DISTRIBUTION

Local Interoffice Transport / <10 Circuits / Dispatch (B.2.1.2.1.1) (September & October)

There were only 8 orders during the period of September and October for this sub-metric. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

Combo Other / < 10 Circuits / Dispatch (B.2.1.4.1.1) (September, October & November)

Combo Other / < 10 Circuits / Dispatch In (B.2.1.4.1.4) (September, October & November)

The current products and services included in these sub-metrics consist mainly of EELS and other designed combinations that are very complex and consist of multiple facilities between customer locations and at least two central office locations. The current retail analogue for these circuits is residence, business and design which is over 90% POTS and have much shorter installation intervals than design circuits

UNE ISDN / < 6 Circuits / Non Dispatch (B.2.1.6.3.2) (September, October & November)

Digital Loops < DS1 / < 10 Circuits / Non Dispatch (B.2.1.18.1.2) (September, October & November)

2W Analog Loop w/LNP Non Design / < 10 Circuits / Dispatch In (B.2.1.13.1.4) (September, October & November)

UDC/IDSL / < 10 Circuits / Non-Dispatch (B.2.1.20.1.2) (September, October & November)

BellSouth is unable to determine at the time of the FOC whether the order will require a dispatch or not. Therefore, these orders are scheduled with a dispatch interval that will always be longer than the non-dispatched analogue. BellSouth would have met the parity requirement, if compared with the dispatch retail analogue.

EELs / < 10 Circuits / Dispatch (B.2.36.1.1) (September, October & November)

EELs / < 10 Circuits / Non Dispatch (B.2.36.1.2) (September, October & November)

EELs / < 10 Circuits / Dispatch (B.2.37.1.1) (September, October & November)

EELs / < 10 Circuits / Non Dispatch (B.2.37.1.2) (September, October & November)

BellSouth's root cause analysis has determined two issues that adversely impact BellSouth's ability to meet the Commission's benchmarks for EEL provisioning of 30% within 5

days and 70% with 8 days. First, these benchmarks were established after CLEC participants in the industry workshops represented that they would be ordering significant quantities of voice grade EELs (DS0 level), which do not take long to provision. However, in reality CLECs in Georgia are not ordering any voice grade EELs, and the vast majority of the CLEC orders for EELs are at DS1 levels, which take longer to provision. Second, the performance data for these sub-metrics include EELs when the loop and transport facilities necessary to provision the circuit are not available or when the EEL is at a DS3 level and higher, which generally have provisioning intervals that are considerably longer than five or eight days.

Nevertheless, Bellsouth has reduced the standard interval from 10 days to 7 days in an attempt to meet the Commission's benchmarks. BellSouth will continue to monitor performance to determine what, if any, additional provisioning changes can be made to ensure compliance with these benchmarks.

Digital Loops < DS1 / < 10 Circuits / Dispatch (B.2.1.18.1.1) (September, October & November)

Digital Loops < DS1 / < 10 Circuits / Non-Dispatch (B.2.1.18.1.2) (September, October & November)

The wholesale results did not meet the parity comparison in September through November 2003. The initial root cause analysis indicated that the major reason for this sub-metric not meeting the parity requirement is the difference in intervals for the retail analogue circuits compared with the CLEC products. The current recommended standard wholesale interval for the products included in this sub-metric range from 5 days to 10 days, currently averaging closer to the 10-day interval. The retail analogue for this product currently averages between 4 and 5 days. BellSouth meets the majority of the scheduled installations for this

product as indicated by the B.2.18.18 sub-metric. BellSouth continues to look for ways to reduce the CLEC interval for these products, however with many of the wholesale circuits being new locations compared with additional circuits being added to existing locations for the retail analogue, these intervals will continue to be longer for the CLEC circuits.

UNE UCL – Non Design / < 10 Circuits / Dispatch (B.2.2.3) (September, October & November)

There were seven or fewer CLEC orders in any one-month (14 total orders) from September through November 2003 for this sub-metric. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

P4B: FIRM ORDER AVERAGE COMPLETION (OCI) INTERVAL & ORDER COMPLETION INTERVAL DISTRIBUTION

Combo Other / < 10 Circuits / Dispatch / Part Mech (B.2.35.4.2.1.1) (September & October)

Combo Other / < 10 Circuits / Dispatch / Part Mech (B.2.35.4.2.1.4) (September & October)

Combo Other / < 10 Circuits / Dispatch / Non Mech (B.2.35.4.3.1.1) (September & October)

Combo Other / < 10 Circuits / Dispatch / Non Mech (B.2.35.4.3.1.4) (September & October)

UNE ISDN / < 6 Circuits / Non Dispatch / Mech (B.2.35.6.1.3.2) (September & October)

UNE ISDN / < 6 Circuits / Non Dispatch / Mech (B.2.35.6.2.3.2) (September & October)

2W Analog Loop Design / < 10 Circuits / Non Dispatch /Mech (B.2.35.8.1.1.2) (September & October)

2W Analog Loop w/LNP Non Design / < 10 Circuits / Dispatch In /Mech (B.2.35.13.1.1.4) (September, October & November)

Digital Loop / < DS1 / < 10 Circuits / Dispatch / Mech (B.2.35.18.1.1.1) (September, October & November)

Digital Loop / < DS1 / < 10 Circuits / Non Dispatch / Mech (B.2.35.18.1.1.2) (September, October & November)

Digital Loop / < DS1 / < 10 Circuits / Dispatch / Part Mech (B.2.35.18.2.1.1) (September, October & November)

Digital Loop / < DS1 / < 10 Circuits / Non Dispatch / Part Mech (B.2.35.18.2.1.2) (September, October & November)

UDC/IDSL / < 10 Circuits / Non Dispatch / Mech (B.2.35.20.1.1.2) (September, October & November)

UDC/IDSL / < 10 Circuits / Non Dispatch / Part Mech (B.2.35.20.2.1.2) (September, October & November)

EELs / < 10 Circuits / Dispatch / Mech (B.2.38.1.1.1) (September & October)

EELs / < 10 Circuits / Dispatch / Part Mech (B.2.38.2.1.1) (September & October)

EELs / < 10 Circuits / Non Dispatch / Part Mech (B.2.38.2.1.2) (September & October)

EELs / < 10 Circuits / Dispatch / Non Mech (B.2.38.3.1.1) (September & October)

EELs / < 10 Circuits / Non Dispatch / Non Mech (B.2.38.3.1.2) (September & October)

EELs / < 10 Circuits / Dispatch / Mech (B.2.39.1.1.1) (September & October)

EELs / < 10 Circuits / Non Dispatch / Mech (B.2.39.1.1.2) (September & October)

EELs / < 10 Circuits / Dispatch / Part Mech (B.2.39.2.1.1) (September & October)

EELs / < 10 Circuits / Non Dispatch / Part Mech (B.2.39.2.1.2) (September & October)

EELs / < 10 Circuits / Dispatch / Non Mech (B.2.39.3.1.1) (September & October)

EELs / < 10 Circuits / Non Dispatch / Non Mech (B.2.39.3.1.2) (September & October)

xDSL / w/o Conditioning / < 6 Circuits / Dispatch / Non Mech (B.2.40.2.3.3.1) (June & July)

UNE UCL – ND / < 10 Circuits / Dispatch / Part Mech (B.2.40.3.2.1.1) (September & October)

See responses for Measure P4A above, which are equally applicable to these sub-metrics.

P-9: % PROVISIONING TROUBLES WITHIN 30 DAYS OF SERVICE ORDER COMPLETION

Resale Residence / < 10 Circuits / Non Dispatch (A.2.12.1.1.2) (September, October & November)

There were a total of 1,389 CLEC troubles reported for the 28,636 completed orders (95% trouble-free) during this three-month period. In reviewing this comparison, there was less than a 1% difference in the wholesale and retail results, with the retail volume being approximately 50 times the volume of the wholesale results. BellSouth has launched a proactive initiative to detect field problems such as broken jumpers, defective network terminating wire at the customer premise, etc. to reduce the percentage of orders that receive trouble reports in non-dispatched sub-metrics.

UNE ISDN / < 10 Circuits / Non Dispatch (B.2.19.6.1.2) (September, October & November)

There were a total of 69 completed orders with 8 reported troubles during the period of September through November 2003. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

UNE Digital Loop < DS1/ < 10 Circuits / Dispatch (B.2.19.18.1.1) (September & November)

There were a total of 295 completed orders with 27 reported troubles during the period of September through November 2003. This averaged less than 10 reports a month and no systemic issues were identified for any of the reported troubles.

UNE Digital Loop ≥ DS1/ < 10 Circuits / Non Dispatch (B.2.19.19.1.2) (September & November)

There were a total of 72 completed orders with 8 reported troubles during the period of September through November 2003. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

P-11: SERVICE ORDER ACCURACY

Resale / Region (F.16.1) (October & November)

BellSouth met the accuracy requirement for the two-month total of 19,243 of the 20,501 LSRs (94%) sampled in this sub-metric from October & November 2003. No systemic issues have been identified for this interim arrangement based on the first two months of data. BellSouth continues to review the service orders prepared by the service representative in an effort to correct the errors detected in this sub-metric.

P-13: % LNP DISCONNECT TIMELINESS

P-13B: % of Time BellSouth Applies Trigger Order (B.2.41) (September & November)

BellSouth applied the 10-digit trigger order for LNP TNs 92% of the time (8504/9254) prior to the due date during the period of September through November 2003. The benchmark for this sub-metric is 96.5% prior to the due date.

P-13C: % Out of Service < 60 minutes (B.2.42) (September & November)

BellSouth activated the LNP port in under 60 minutes 93% of the time (16876/18069) during the period of September through November 2003. The benchmark for this sub-metric is 96.5% prior to the due date.

P-13D: % Disconnect Timeliness Interval for Non Trigger Orders (B.2.43) (September, October & November)

BellSouth disconnected the non-trigger order for LNP TNs 77% of the time (254/328) within four hours of receiving a valid number porter message from NPAC during the period of September through November 2003. The benchmark for this sub-metric is 95% within 4 hours. All three of these measures have large quantities of telephone numbers tied to one service order. For example, in September 2003 the P-13C measure missed 506 of the 4,983 numbers that were out for more than 1-hour. There were 499 of these 506 numbers associated with one service order that did not meet the benchmark. Excluding this one service order, BellSouth met 99.8% of all orders included. Even though some of the numbers were worked, the timestamp is based on the total completion of the service order. In the majority of the sub-metrics, one or two service orders being missed is the reason the sub-metric does not meet the 96.5% benchmark. BellSouth continues to focus on meeting the benchmarks for these measures.

SECTION 4: MAINTENANCE AND REPAIR

M&R-1: MISSED REPAIR APPOINTMENTS

Resale Residence / Non-Dispatch (A.3.1.1.2) (September, October & November)

BellSouth failed to meet 35 of 688 scheduled appointments in the three-month period of September through November 2003 in this sub-metric. The initial analysis indicated that the majority of the 35 missed appointments were closed as no trouble found. BellSouth personnel have been covered to refocus on proper analysis techniques and not to spend extra time trying to correct a problem that does not exist.

Resale Design / Dispatch (A.3.1.3.1) (September & October)

BellSouth failed to meet 7 of 186 scheduled appointments in the three-month period of September through November 2003 in this sub-metric. With over 96% completion rate during the period, there was no systemic issue identified for any of the 7 missed appointments.

Resale Centrex / Non Dispatch (A.3.1.5.2) (September & October)

BellSouth failed to meet 4 scheduled appointments in the three-month period of September through November 2003 in this sub-metric. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

UNE Loop & Port Combinations / Non-Dispatch (B.3.1.3.2) (September, October & November)

BellSouth failed to meet 266 of 5978 scheduled appointments in the three-month period of September through November 2003 in this sub-metric. A detailed analysis indicated that 174 of the 266 missed appointments were improperly coded and should have been excluded from this measure. Exclusion of these 174 appointments would have met the retail analogue comparison

for these missed sub-metrics. BellSouth personnel are being covered on proper coding for excludable reports.

M&R-2: CUSTOMER TROUBLE REPORT RATE

Residence / Dispatch (A.3.2.1.1) (September, October & November)

Business / Dispatch (A.3.2.2.1) (October & November)

Design (Specials) / Dispatch (A.3.2.3.1) (September, October & November)

Design (Specials) / Non-Dispatch (A.3.2.3.2) (September, October & November)

Even though BellSouth exceeded the retail analogue comparison for these sub-metrics, BellSouth provided over 97% trouble-free service for both the wholesale and retail lines during September through November 2003. There were no systemic issues identified for any of the troubles reported in these sub-metrics.

Combo Other / Dispatch (B.3.2.4.1) (September, October & November)

Approximately 97% of all in-service lines were trouble free during the period of September through November 2003. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period from June through August 2003. There were no systemic issues identified for any of the troubles reported during the period. The major difference in this comparison is the large volume difference. The retail analogue averages over 3.6 million compared with 7 thousand for the CLEC volume. Furthermore, the majority of the circuits in the analogue is POTS compared with the CLEC circuits that consist mainly of EELs, which are much more complex and have a higher report rate than the basic service of the analogue.

xDSL / Dispatch (B.3.2.5.1) (September, October & November)

Over 99% of all in-service lines were trouble free during the period of September through November 2003. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. There were no systemic issues identified for any of the troubles reported during the period.

Other Design / Dispatch (B.3.2.10.1) (September, October & November)

Other Design / Non-Dispatch (B.3.2.10.2) (September, October & November)

Over 97% of all in-service lines were trouble free during the period of June through August 2003. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. There were no systemic issues identified for any of the troubles reported during the period. The major difference in parity is due to the difference in volumes for the retail compared with the wholesale. The retail analogue is approximately 100 times larger in volume compared with the CLEC volumes.

M&R-3: MAINTENANCE AVERAGE DURATION

Resale PBX / Non-Dispatch (A.3.3.4.2) (September & November)

There were a total of 2 troubles reported in this sub-metric during the period from September through November 2003. Any extended duration ticket with the size of the universe will have a major affect on the average duration. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

M&R-5: PERCENT OUT OF SERVICE GREATER THAN 24 HOURS

Resale Design (Specials) / Dispatch (A.3.5.3.1) (September & October)

There were a total of 7 troubles out of service > 24 hours in this sub-metric during the period from September through November 2003. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

Resale Centrex / Dispatch (A.3.5.5.1) (September & November)

There were a total of 7 troubles out of service > 24 hours in this sub-metric during the period from September through November 2003. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

SECTION 11: CHANGE MANAGEMENT

CM-6: SOFTWARE ERRORS CORRECTED WITH "X" DAYS

Sub-metrics F.10.7 through F.10.9 measure the percentage of Software Errors corrected within X Business Days for Type 6 change requests. Type 6 requests are classified as defects in the Change Control Process (CCP) and further assigned a severity level: 2, 3 or 4. Severity 2 requests are defined as errors that could cause a potential problem with the CLEC interface, do not have a workaround, and are to be corrected within 10 business days. Severity 3 requests are the same as Severity 2 but have workarounds in place and must be completed within 30 business days. Severity 4 errors are less significant as do not require the CLECs to take any special steps to process their orders and must be corrected within 45 business days.

Furthermore, BellSouth's root cause analysis indicates that not all issues classified as "defects" for purposes of this measure are actually defects in the software. Under the CCP, Type 6 change requests include errors that are made when designing and subsequently coding the software as well as differences in interpretation between BellSouth and CLECs or oversights in documenting the functionality that should be created. The current definition for a Type 6 change request does not distinguish between a coding error versus an oversight in documenting the functionality to be designed, even though the latter is not truly a "software defect." In the case of an oversight or interpretation difference, the software is in fact functioning as designed. Based on the current CCP defect definitions, a defect is created when the system does not perform as expected, regardless of whether the behavior was introduced because of a coding error or not. When change requests are validated, the request is documented in business rules that are developed to describe the change, user requirements that reflect how the systems should be changed to implement the revised business rules, and systems requirements that reflect the actual

software changes that will be made to satisfy the request. This series of documentation is used to test and validate software changes. If the system is determined to not be working according to the written requirements, it is considered a defect. In this case, the developer has a "road map" (*i.e.*, these documented requirements) that explains how the software is supposed to behave and what should be done to correct the defect. The defect is then assigned a severity level that reflects the impact to the functionality and that determines how soon the defect should be corrected.

By contrast, when a Type 6 change request actually reflects an oversight in developing requirements or business rules or an interpretive difference, the developers do not have a "road map" that indicates how the software should behave or what changes should be made to correct the problem. In this case, the functionality was developed, tested and implemented as intended by all the documentation (i.e., business rules, user/system requirements). To implement this version of a Type 6 change request involves adding new functionality, which requires developing new business rules, user requirements, and system requirements, all of which must be defined and validated before software changes can be made. Even though this new feature does not prevent a CLEC from using the software as designed, it is counted as a defect under this measure. Importantly, the additional work required to implement a new feature almost always requires the work to be done in a software release which requires longer than the time frames permitted by this measure to schedule and produce.

The other problem is that, by the time this measure was implemented, the majority of the available resources for software updates had been committed, which left few resources for the correction of software defects. BellSouth is working to resolve the remaining backlog of Type 6 defects based on the resources available, while at the same time balancing the requirement

imposed by Measure CM-11 to implement all requested changes within 60 weeks from prioritization.

Region / Corrected within 10 Business Days (F.10.7) (September, October & November)

Region / Corrected within 30 Business Days (F.10.8) (September, October & November)

Region / Corrected within 45 Business Days (F.10.9) (September, October & November)

BellSouth did not meet the 95% benchmark for any of the above submetrics during the September, October and November 2003 time period. As stated previously, BellSouth is working to resolve the remaining backlog and meet the standards for new requests of Type 6 defects with the majority of these issues being defects that involve feature changes and require updated user requirements. In an effort to resolve the current backlog of change requests BellSouth is taking the following action:

- Realignment of Resources – BellSouth is in the process of realigning some of its resources to streamline the implementation of the change requests associated with defects.
- In early 2004, BellSouth is planning to add a new, internal test environment that will assist with the implementation testing of Severity 3 and 4 defects.
- Revising the User Requirement Process – BellSouth is identifying ways to improve the user requirements process to help with the elimination of defects caused by oversight or interpretation differences. As part of this process, BellSouth is looking to get the CLECs more engaged upfront with the user requirements process to ensure that user requirements development is consistent with the requestor's expectations.

- Reviewing the scheduling of Type 6 change requests to determine if process changes are needed to speed the correction of these change requests. BellSouth is looking to schedule change requests in the next scheduled release. The challenge will be to work with the CLECs to schedule these requests and reprioritize the current scheduled items within that release.

The results of these actions will speed the elimination of the backlog as well as permit earlier implementation of all future Type 6 change requests that arise. The implementation time frame for Type 6 requests that are features will also be improved. However, for the reasons previously stated, it is unlikely that Type 6 requests that are features can be completed within the allotted benchmark.

Beginning in September 2003, there were two Severity 2 requests (feature changes) that were pending with one scheduled for Release 15 in March and the other for Release 17 in August. During the period from September through November 2003, an additional 12 requests were received with 8 of them worked in September and November with three more completed in December. This leaves 3 Severity 2 requests pending, the two that were pending at the beginning of September and one feature change that was received in October and is scheduled for Release 15 in March. BellSouth worked 11 of the 12 Severity 2 requests received from September through November by year-end 2003.

There were 20 Severity 3 requests (17 feature changes and 3 defects) that were pending before September 2003 with all scheduled for upcoming Release 15 through Release 17. During the period from September through November 2003, an additional 21 requests were received. BellSouth worked 10 of the new requests and 7 of the existing pre-September requests in the September and November releases. An additional five requests (3 existing and 2 new) were

completed in the December release. This leaves 19 Severity 3 requests (11 feature changes and 8 defects) pending, ten that were pending at the beginning of September and nine that were received in September through November 2003. The 8 defects are scheduled to be included with release 16 in July and the remaining 11 feature requests are to be completed by release 17 in August.

There were 6 Severity 4 requests (all feature changes) that were pending with all scheduled for Release 13 through Release 16. During the period from September through November 2003, 2 additional requests were received. BellSouth worked 4 of the existing pre-September requests in the November release. This leaves four Severity 4 requests (2 feature changes and 2 defects) pending, two that were pending at the beginning of September and two that were received in September through November 2003. All four requests are scheduled to be completed with release 15 in March and release 16 in July.

While below the Commission's 95% benchmark, BellSouth's defect correction performance is increasing, particularly given the relatively limited number of defects in BellSouth's software releases. As stated above, BellSouth is working diligently to reduce and eventually eliminate the defect backlog by mid-year 2004.

Respectfully submitted, this 2nd day of February 2004.

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CERTIFICATE OF SERVICE
Docket No. 7892-U

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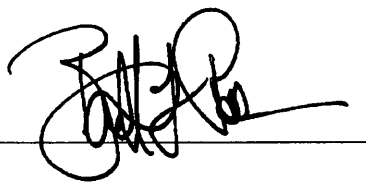

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