

BellSouth Telecommunications, Inc.

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June 6, 2006

VIA HAND DELIVERY

Filed Electronically in Docket Office on 06/06/06

Hon. Ron Jones, 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 Jones:

Consistent with the terms of the Settlement Agreement relating to performance measurements approved by the Authority in this proceeding, BellSouth is filing five paper copies of the Preliminary Notification Report for the data month of July 2006. This Report is being filed for informational purposes 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

PROPOSED JULY DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the July 2006 data month. Results for the July 2006 data month will be posted as follows:

Preliminary results August 21, 2006 Final results August 31, 2006

BellSouth provides Data Notifications each month in compliance with the SQM Plan. 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.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) Affected Measures: OSS-1

Description of Change: Currently, the 12-month Report for this measure displays the BellSouth and CLEC data for CRIS, DLETH, DLR, LMOS, LMOSUPD, LNP Gateway, MARCH, NIW, OSPCM, PREDICTOR, and SOCS as a two-place decimal form. BellSouth proposes to change the way the report is displayed to a percentage with two decimal places for planned standardization. This proposed change was Item (1) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8421)

Impact of Change: No impact to data. Due to the impact of this change, reposting is not necessary.

Provisioning Measurements

(2) Affected Measures: P-7D

Description of Change: Currently, the Aggregate web reports reflect two decimal places for both the numerator and denominator. BellSouth proposes to remove

the decimal places for all states. This proposed change was Item (2) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8339)

Impact of Change: No change to measurement results. Due to the impact of this change, reposting is not necessary.

(3) Affected Measures: P-11

Description of Change: Currently, BellSouth is identifying duplications of PONs when trying to match a service order to the LSR. To further refine this matching process, BellSouth proposes to test an additional field in order to associate the Service Order with the appropriate request. This proposed change was Item (3) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8352)

Impact of Change: In March 2006, 2 service orders were identified with a PON associated with 2 different LSRs. There would be no change to the reported results. Due to the impact of this change, reposting is not necessary.

(4) Affected Measures: P-13D

Description of Change: Currently BellSouth is including records where the CLECs have not met the 30 minute after Activate Message callback requirement. BellSouth proposes to exclude these records in accordance with the Regional SQM. This proposed change was Item (4) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8422)

Impact of Change: For January 2006, in the Region, 2 records were incorrectly included in the results. In Georgia, the results changed from 3 of 8 orders (37.50%) to 3 of 7 orders (42.50%). There was no change in Florida. Due to the small impact of this change, reposting is not necessary.

(5) Affected Measures: P-13 (Alabama, Mississippi, North Carolina, and South Carolina)

Description of Change: BellSouth's regional SQM no longer requires LNP Average Disconnect Timeliness Interval. However, the report is still being produced and displayed on the PMAP website. BellSouth proposes to exclude this measure from PMAP for the above-listed states to comply with the regional SQM. This proposed change was Item (5) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8427)

Impact of Change: The measure will not be included on the PMAP website drop down menu. Due to the impact of this change, reposting is not necessary.

(6) Affected Measures: P-4

Description of Change: Currently, BellSouth is including ADSL orders requesting a "change of speed only" in the retail data. As required by the SQM, this retail product group is compared to UNE Line Splitting/Line Sharing with the intent to measure and report on the interval for installation of new service. The intent of this measure was never to compare minor software changes, which are administrative in nature and do not require technical work. BellSouth proposes to exclude these "change of speed" non-dispatched orders from the product group Retail ADSL in order to perform an analogous comparison to CLEC data. This is based on the fact that for customers who are served by a carrier other than BellSouth; these 'speed only changes' occur outside of BellSouth's purview (network) and are invisible to BellSouth and therefore are not reflected in the CLEC data. This proposed change was Item (6) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8442)

Impact of Change: For February 2006, in Florida, Retail ADSL results would decrease the volume of completed orders in OCI from 54,956 to 28,298 and the OCI interval would change from 2.16 to 3.89 days. The Line Splitting/Line Sharing would not change with 124 completed orders and 1.98 Interval.

In Georgia, for the same period, the volume of completed orders for Retail ADSL in OCI would decrease from 28,934 to 12,411 and the interval would change from 1.27 to 2.12 days. The Line Sharing/Line Splitting interval would remain at 1.81 for 54 orders. Due to the improvement of CLEC results relative to BellSouth, reposting is not necessary.

(7) Affected Measures: P-2B

Description of Change: Currently, the Numerator and Volume Totals for the retail product group "ADSL Provided to Retail" are doubled on this report. BellSouth proposes to correct the calculation to prevent this problem. This proposed change was Item (7) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8502)

Impact of Change: There is no change to the calculated results. For February 2006, in Georgia, the Numerator would decrease from 6,536 to 3,268 and the Volume would decrease from 107,196 to 53,598. In Florida, the Numerator would decrease from 10,052 to 5,026 and the Volume would decrease from 186,348 to 93,174. Due to the impact of this change, reposting is not necessary.

(8) Affected Measures: P-3

Description of Change: With the implementation of the Regional SQM in AL, MS, NC, and SC, BellSouth is inadvertently displaying missed appointments due to end user reasons in the SQM Web reports. BellSouth proposes not to include missed appointments due to end user reasons in accordance with the SQM business rules. (RQ8516)

Impact of Change: For March 2006, SC Resale Business Dispatch reported 8 missed appointments of 74 completed orders with a result of 10.81%. The correct result is 2 missed appointments of 74 completed orders with a result of 2.70%. Retail Business Dispatch reported 291 missed appointments of 2744 completed orders with a result of 10.60%. The correct result is 47 missed appointments of 2744 completed orders with a result of 1.71%. Due to the impact of this change, reposting is not necessary.

M&R Measurements

(9) Affected Measures: MR-1, MR-2, MR-3, MR-4, and MR-5 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee)

Description of Change: BellSouth has identified a code problem where the numerator and denominator for ADSL Provided to Retail is being doubled and Residence Business and Design excluding Digital Loops is being tripled. This is due to the number of times each Product Group is reported as an analog. Additionally, Digital Loops are not being excluded from the Product Group. BellSouth proposes to correct both of these coding problems. This proposed change was Item (8) on the Preliminary July 2006 Data Notification filed on May 1, 2006. (RQ8487)

Impact of Change: In February 2006, there were no calculated metric results changes to any M&R measure except CTRR (M&R 5). For CTRR, the Numerator only is incorrect resulting in improved performance for retail and results in four parity calculation changes. Due to the impact of this change, reposting is not necessary.

Special Access Measurements

(10) Affected Measures: SA-7

Description of Change: Currently, past due circuits, where the completion date has been applied but the status of the order is still pending in SOCS, are not being included in this measure. BellSouth proposes to modify the PMAP data processing to assign all records that reflect a pending SOCS status as a candidate for this measure. This proposed change was Item (1) on the Preliminary September 2005 Data Notification filed on July 1, 2005. (RQ6080)

Impact of Change: For March 2006, in Georgia, the Past Due Circuits report currently reflects no records. After the coding modification, the report would reflect 430 total past due circuits with 137 due to BST Reasons and 293 due to IXC Reasons. The final metric impact for BST Reasons report will be a change from 0.00% to 31.86%; there is no change to the BST Facilities report; the impact of change to the IXC Reasons report is from 0.00% to 68.14%. For Florida, during the same period, the Past Due Circuits report reflects no records. After the coding modification, the report would reflect 52 total past due circuits with 20 due to BST Reasons and 32 due to IXC Reasons. The final metric impact for BST Reasons report changes from 0.00% to 38.46%; there is no change to the BST Facilities report; the impact of change for the IXC Reasons report is from 0.00% to 61.54%. Since this is a diagnostic measure, reposting is not necessary.

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2006, a copy of the foregoing document was served on the following parties, via the method indicated: **David Eppsteiner** [] Hand AT&T [] Mail 1200 Peachtree Street, Suite 8100 [] Facsimile Atlanta, Georgia 30309 [] Overnight eppsteiner@att.com [x] Electronic Henry Walker, Esquire [] Hand Boult, Cummings, et al. [] Mail P. O. Box 198062 [] Facsimile Nashville, TN 37219-8062 [] Overnight hwalker@boultcummings.com [x] Electronic James Murphy, Esquire [] Hand Boult, Cummings, et al. [] Mail P. O. Box 198062 [] Facsimile Nashville, TN 37219-8062 [] Overnight imurphy@boultcummings.com [x] Electronic Charles B. Welch, Esquire [] Hand Farris, Mathews, et al. [] Mail 618 Church St., #300 [] Facsimile Nashville, TN 37219 [] Overnight cwelch@farrismathews.com [x] Electronic Kris Shulman, Esquire [] Hand XO Communications, Inc. [] Mail 105 Malloy Street [] Facsimile Nashville, TN 37201 [] Overnight Kris.shulman@xo.com



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