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VIA HAND DELIVERY

Filed Electronically in Docket Office on 08/01/06 @ 9:17am

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

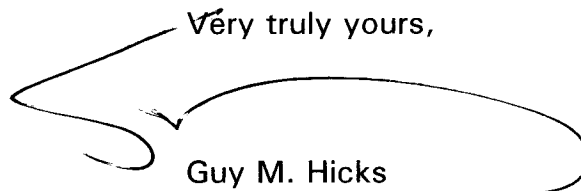
Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

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 five paper copies of Preliminary Notification Report for the data month of September, 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,

A handwritten signature in black ink, appearing to read "Guy M. Hicks", with a large, sweeping loop at the end.

GMH:ch

PROPOSED SEPTEMBER DATA NOTIFICATION

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

| | |
|---------------------|------------------|
| Preliminary results | October 20, 2006 |
| Final results | October 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:* O-8 (RI), O-9 (FOCT), & O-11 (FOCC)

Description of Change: Currently, BellSouth does not have a specific disaggregation for Resale Coin and as a result, BellSouth is not capturing Resale Coin requests for these ordering measures in PMAP. BellSouth proposes to modify its code to include Resale Coin requests in the Resale Business disaggregation. This proposed change was Item (1) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ7210)

Impact of Change: For May 2006 data, the FOCT results for Mechanized requests for Resale Business in GA would change from 98.01% to 98.02%, Partially Mechanized results for Resale Business did not change, and the Non-Mechanized results for Resale Business would change from 97.78% to 96.23%.

Mechanized requests for Resale Business in FL would change from 99.54% to 99.55%, Partially Mechanized results for Resale Business did not change, and the Non-Mechanized results for Resale Business would change from 96.00% to 95.37%. Due to the impact of this change, reposting is not necessary.

(2) *Affected Measures:* PO-2 (LMT)

Description of Change: Currently, BellSouth is capturing multiple outbound timestamps for EDI Loop Makeup queries and is reporting those transactions more than once. BellSouth proposes to modify its code to report each query only once. This proposed change was Item (2) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8578)

Impact of Change: In May 2006, had these queries been counted only once, the result would have changed from 73.06% to 97.12% in GA and from 96.56% to 99.64% in FL. Due to the impact of this change, reposting is necessary.

(3) *Affected Measures:* PO-2 (LMT)

Description of Change: BellSouth has not been including Web-based XML Loop Makeup queries in this measure. BellSouth proposes to change its code to begin including these transactions. This proposed change was Item (3) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8576)

Impact of Change: For May 2006 data, there were 4,388 Web-based XML records for the region. Of these, 1,822 had no state populated and the remaining 2,566 were in the state of FL. Had these queries been included the result in FL would have changed from 99.64% to 99.56%. Due to the impact of this change, reposting is not necessary.

(4) *Affected Measures:* PO-2 (LMT)

Description of Change: BellSouth has not been including “Loop Reservation by Cable and Pair” or “Loop Reservation Cancel” requests in the Electronic Loop Makeup Response Time measure. BellSouth proposes to change its code to include these transactions. This proposed change was Item (4) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8157)

Impact of Change: For May 2006 data, BellSouth would report an additional 3,100 records for the region. The state results were not available for analysis, however with the inclusion of these records, the region results changed from 97.87% to 97.92%. Due to the impact of this change, reposting is not necessary.

(5) *Affected Measures:* PO-2 (LMT)

Description of Change: Currently, BellSouth is displaying the numerator as both the numerator and denominator on CLEC specific reports for Electronic Loop Makeup Response Time. BellSouth proposes to change its code to report the correct denominator. This proposed change was Item (5) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8579)

Impact of Change: The CLEC SpecificWeb reports will be corrected. Aggregate reports and SEEMs calculations are not impacted. Due to the impact of this change, reposting is not necessary.

Provisioning Measurements

(6) *Affected Measures:* P-11 (SOAC)

Description of Change: Currently in all states except Louisiana, BellSouth is using Service Order Listing data from a table, which includes only the main listing, causing all additional listings to fallout for manual review. BellSouth proposes to update PMAP by using a comprehensive table that includes both the main Listing data as well as additional Listing data. This proposed change was Item (6) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ6373)

Impact of Change: For May 2006 data, 2 additional orders in Georgia and 1 additional order in Florida would have been identified. The addition of these orders would not have changed the reported results in either state. Due to the impact of this change, reposting is not necessary.

(7) *Affected Measures:* P-13C (LAT)

Description of Change: Currently BellSouth is including zero due dated orders that are expedited by a CLEC for this measure. BellSouth proposes to exclude these orders, which is consistent with the exclusion identified in the regional SQM. This proposed change was Item (7) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8365)

Impact of Change: For March 2006, there was only 1 record in the BellSouth region (Alabama) that should have been excluded. Due to the impact of this change, reposting is not necessary.

(8) *Affected Measures:* P-7A (CCT) AL, MS, and SC Only

Description of Change: With the implementation of the Regional SQM plan in AL, MS, and SC, BellSouth is incorrectly excluding IDLC records from the Web reports in these states. BellSouth proposes to modify the code for this measure to include these records. This proposed change was Item (8) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8493)

Impact of Change: For May 2006 data, 9 IDLC records were excluded from the Hot Cut Timeliness web report for AL, MS and SC. By including these records, the IDLC results for these states would have changed from null to 100%. Due to the impact of this change, reposting is not necessary.

- (9) *Affected Measures:* P-1 (HOI), P-2B (PJ), P-3 (MIA), P-4 (OCI), P-5 (CNI), P-9 (PPT)

Description of Change: Currently, in all states except LA, BellSouth does not include Retail ISDN-BRI in the "Residence, Business and Design (Dispatch) (Excluding Digital Loops)" product group. BellSouth proposes to include the Retail ISDN-BRI products in the product group mentioned above. This proposed change was Item (9) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8512)

Impact of Change: For March 2006, Florida OCI results for "Residence, Business and Design (Dispatch) (Excluding Digital Loops)" product group would change from 3.49 to 3.50, and in Georgia the results would change from 3.76 to 3.78. Due to the impact of this change, reposting is not necessary.

- (10) *Affected Measures:* P-7D (NCDD)

Description of Change: Currently in all states except Louisiana, BellSouth is including orders for CLEC caused delays in the data. BellSouth proposes to exclude these records, which is consistent with the exclusions identified in the SQM. This proposed change was Item (10) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8549)

Impact of Change: For February, March and April 2006 data, no records were identified. Due to the impact of this change, reposting is not necessary.

- (11) *Affected Measures:* P-2A (PJ48), P-2B (PJ) KY Only

Description of Change: Currently, BellSouth is using an incorrect equity computation method to display results for the sub metric UNE XDSL Loop in these measures. BellSouth proposes to correct the methodology as outlined in the SQM. This proposed change was Item (11) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8566)

Impact of Change: No impact to the reported results. The correct equity result would be displayed. Due to the impact of this change, reposting is not necessary.

- (12) *Affected Measures:* P-4 (OCI) TN Only

Description of Change: Currently, BellSouth is doubling the numerator and denominator on the Aggregate report for the products "UNE EELS" and the Analog "Retail DS1/DS3". BellSouth proposes to modify its code to eliminate this problem. This proposed change was Item (12) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8568)

Impact of Change: For April 2006 data, there was no change in reported results, the numerator and denominator will be displayed correctly. Due to the impact of this change, reposting is not necessary.

- (13) *Affected Measures:* P-1 (HOI), P-2A (PJ48), P-2B (PJ), P-3 (MIA), P-4 (OCI), P-5 (CNI), P-9 (PPT)

Description of Change: Currently, BellSouth is incorrectly identifying Coin Conversions orders as BellSouth orders during the conversion process to the CLECs. BellSouth proposes to correct its code to correctly identify these orders as CLEC orders. This proposed change was Item (13) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8597)

Impact of Change: For April 2006, data in Georgia and Florida, there was no change in the CLEC Aggregate results. Due to the impact of this change, reposting is not necessary.

- (14) *Affected Measures:* O-9 (FOCT), P-3 (MIA), M&R-1 (MRA), & M&R-3 (MAD)

Description of Change: Currently, BellSouth is incorrectly mapping 2 products (UNE DS1 Channelized and Non-Channelized Local Loops) as part of the Comprehensive Commercial Agreements metrics. BellSouth proposes to change the mapping for these 2 products from the Comprehensive Commercial Agreements metrics to PMAP. (RQ8640)

Impact of Change: For May 2006 data, Georgia MIA results for the CLEC Metric would decrease by 0.04% from 3.39% to 3.35%. Due to the impact of this change, reposting is not necessary.

M&R Measurements

- (15) *Affected Measures:* M&R-2 (CTRR)

Description of Change: BellSouth has determined that the WFA feed for lines in service contains records for lines in “Pending” status. As per the business rules in the SQM, CTRR contains all “Closed customer direct reports”. Since orders in pending status are not “Closed customer direct reports”, BellSouth proposes not to include lines in pending status. This proposed change was Item (14) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8519)

Impact of Change: For April 2006 data, there was no change in either the BellSouth or the CLEC metric. Due to the impact of this change, reposting is not necessary.

Billing Measurements

- (16) *Affected Measures:* B-2 (BIT)

Description of Change: BellSouth has identified a scenario in which a negative Billing Invoice Timeliness result could occur. BellSouth proposes to correct its code to properly

identify the result. This proposed change was Item (15) on the Preliminary September 2006 Data Notification filed on July 3, 2006. (RQ8530)

Impact of Change: For March and April 2006, there were no changes to the results at the aggregate level. Due to the impact of this change, reposting is not necessary.

Special Access Measurements

- (17) *Affected Measures:* SA-1, SA-2, and SA-3

Description of Change: BellSouth has identified that it is not processing the code for Dry Fiber correctly. BellSouth proposes to correct its code to process this product correctly. (RQ7508)

Impact of Change: For May 2006 data, no records were identified. Due to the impact of this change, reposting is not necessary.

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

Description of Change: BellSouth has discovered that it is assigning 1 day (24 hrs.) to access service requests (ASRs) submitted after 3pm (ET) on a Thursday and completed on a Saturday or Sunday. BellSouth proposes to correct its code to show that service request should receive 1/3 day (8 hrs.) as the duration, which is consistent with the current coding for other zero due dated orders in PMAP. (RQ7509)

Impact of Change: For May 2006 data, there were no changes to the results at the aggregate level. Due to the impact of this change, reposting is not necessary.

- (19) *Affected Measures:* SA-1, SA-2, and SA-3

Description of Change: BellSouth has determined that it is not excluding some Record ASRs. BellSouth proposes to correct its code to exclude all Record ASRs, which is consistent with the exclusions identified in the regional SQM. (RQ7510)

Impact of Change: For May 2006 data, one record was identified. Due to the impact of this change, reposting is not necessary.

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2006, a copy of the foregoing document was served on the following parties, via the method indicated:

| | |
|--|--|
| <input type="checkbox"/> Hand | David Eppsteiner |
| <input type="checkbox"/> Mail | AT&T |
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| <input type="checkbox"/> Overnight | Atlanta, Georgia 30309 |
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| <input type="checkbox"/> Hand | Henry Walker, Esquire |
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