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VIA HAND DELIVERY

filed electronically in docket office on 09/22/06

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

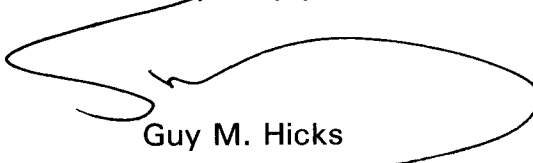
Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

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 November 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

PRELIMINARY NOVEMBER DATA NOTIFICATION

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

Preliminary results	December 20, 2006
Final results	December 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-9 (FOCT)

Description of Change: Currently, BellSouth is incorrectly reporting a small number of records as INP LSRs when they are actually LNP LSRs. BellSouth proposes to modify the code to correct this issue. (RQ6998)

Impact of Change: For July 2006 data, there was one record counted in UNE Analog Loop instead of UNE Analog Loop / w LNP for Georgia and one record that was not reported in FOCT in LA.

- (2) *Affected Measures:* OSS-1 (ARI), OSS-2 (IA), PO-2 (LMT), PO-3 (BMA)

Description of Change: Currently the PMAP website has OSS Reports listed under Pre-Ordering and Maintenance and Repair subject drop down boxes. BellSouth proposes to create a new subject drop down box to be named "OSS" to display all reports related to OSS Systems. This change is consistent with the SQM table of contents. (RQ7722)

Impact of Change: None

- (3) *Affected Measures:* O-8 (RI), O-9 (FOCT)

Description of Change: Currently, BellSouth's starting timestamps for EDI and XML Single LSRs in a Bulk Arrangement are being taken from LNP gateway instead of EDI or SGG. BellSouth proposes to modify the code, which will allow PMAP to capture the correct timestamp. (RQ7968)

Impact of Change: For July 2006 data, there was no change to the reported results.

(4) *Affected Measures:* OSS-1 (ARI)

Description of Change: Currently, BellSouth is displaying EDI transaction names as diagnostic and is displaying some RNS and ROS transaction names as diagnostic. Additionally, BellSouth is not displaying ATLAS MLH for TAG/XML in Tennessee and Florida. BellSouth proposes to remove all transaction names that are currently displayed as diagnostic and to include ATLAS MLH for TAG/XML in TN and FL. (RQ8423)

Impact of Change: None.

(5) *Affected Measures:* OSS-1 (ARI)

Description of Change: Currently, BellSouth is reporting duplicate records for the Response Interval Measure. BellSouth proposes adding a code to check and eliminate duplicates from this measure. (RQ8670)

Impact of Change: BellSouth continues to investigate the impact of this change.

(6) *Affected Measures:* OSS- 1 (ARI)

Description of Change: Currently, BellSouth has discovered records that were not included in the Response Interval Measure. For example, this scenario can occur where COFFI queries PSIMS more than once during the same transaction. BellSouth proposes changing the code to allow these transactions to be included in the measure. (RQ8683)

Impact of Change: BellSouth continues to investigate the impact of this change.

(7) *Affected Measures:* O-8 (RI), O-9 (FOCT), & O-11(FOCC) AL, MS, NC, & SC

Description of Change: Currently, BellSouth is not counting LSRs submitted as Single LSRs in a Bulk Arrangement in Alabama, Mississippi, North Carolina, or South Carolina. BellSouth proposes to modify its code to include single LSRs submitted in a Bulk arrangement in these states. (RQ8699)

Impact of Change: For July 2006 data in Mississippi, the results for Fully Mechanized FOCT for UNE Analog Loop with LNP would have increased from 63.64% to 90.97%. Partial Mechanized FOCT for UNE Analog Loop with LNP would have increased from 80.00% to 81.00%. There was no change in results for Fully Mechanized Rejects. Partial

Mechanized Rejects would have decreased from 97.89% to 97.08%. There was no change in results for FOCC.

Provisioning Measurements

- (8) *Affected Measures:* P-3 (MIA), P-4 (OCI), P-5 (CNI), & P-9 (PPT)

Description of Change: Currently in PMAP, Port-only Standalone products roll up into two product groups: LNP Standalone and UNE Other Non-Design. BellSouth proposes to remove the Port-only Standalone products from the UNE Other Non-Design, so they will only be reported in LNP Standalone. (RQ8657)

Impact of Change: For June 2006, Florida OCI UNE Other Non-Design volume would decrease from 9512 to 1, but the data is still captured in LNP Standalone.

- (9) *Affected Measures:* P-5 (CNI) All States except LA

Description of Change: Currently, the CNI 12-month report has the numerator as a whole number, while the Aggregate and CLEC specific reports have the numerator as two decimal places. BellSouth proposes to change the numerator on the 12-month report to match the numerator on the Aggregate and CLEC Specific reports. (RQ8666)

Impact of Change: No change to the reported results.

- (10) *Affected Measures:* P-7D (NCDD) All States except LA

Description of Change: Currently PMAP is not mechanically capturing the manually sent 'Go Ahead' CLEC messages. A process in WFA has been developed to capture this information. BellSouth Proposes to modify its code so that PMAP will begin using these fields from WFA during the metric calculation process. (RQ8693)

Impact of Change: For June 2006 data, the results for Non-Coordinated Customer Conversions in GA would change from 94.63% to 98.05%.

- (11) *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: BellSouth has identified an additional USOC that can be utilized to segregate UNE Analog Loop Non-Design orders from UNE other Non-Design orders. BellSouth proposes to modify its code to report these orders in the UNE Analog Loop Non-Design disaggregation as outlined in the SQM. (RQ8750)

Impact of Change: For July 2006 data, Florida OCI results for UNE Analog Loop Non-Design, Non-Dispatch, with < 6 circuits would change from 2.74 to 4.53 days and UNE Other Non-Design, Non-Dispatch, with < 6 circuits would change from 1.30 to 1.24 days.

For July 2006 data, Georgia OCI results for UNE Analog Loop Non-Design, Non-Dispatch, with < 6 circuits would change from 3.25 to 4.88 days and UNE Other Non-Design, Non-Dispatch, with < 6 circuits would change from 1.31 to 1.28 days.

Trunk Group Performance Measurements

- (12) *Affected Measures:* TGP-1 (TGP)

Description of Change: Currently, on the CLEC Specific web reports, trunk group blocking data is displayed regardless of which state code is selected. BellSouth proposes to correct the CLEC Specific web report to display only the data for the state code that is selected. (RQ8513)

Impact of Change: There is no impact to results; only the data for the state code that is selected will be displayed.

Database Update Measurements

- (13) *Affected Measures:* D-1 (Average Database Update Interval), D-2 (Percent Database Update Accuracy), & D-3 (Percent NXXs and LRNs Loaded by the LERG Effective Date) – LA Only

Description of Change: Currently, BellSouth is reporting D-1, D-2, and D-3 in Louisiana. These measures are not part of the Louisiana SQM. BellSouth proposes to delete these measures. (RQ8187)

Impact of Change: Reports will not be posted in Louisiana.

Collocation Measurements

- (14) *Affected Measures:* C-2 (AT)

Description of Change: Currently, PMAP does not sum the Average Arrangement Time correctly on the CLEC Specific reports. BellSouth proposes to modify its code by totaling ‘like’ collocation arrangement times by Parent OCN. (RQ8726)

Impact of Change: There is no impact to reported results.

Special Access Measurements

- (15) *Affected Measures:* SA-1, SA-2, & SA-3 (GA, KY, & FL)

Description of Change: BellSouth has developed coding rules, which better identifies records that should be included in these measures. BellSouth proposes to implement these changes. (RQ8697)

Impact of Change: For July 2006 data in Florida, the DS1 metric for the “0 Days” interval would change from 66.36% to 65.00%. For July 2006 data in Georgia, the DS1 metric for “0 Days” interval would change from 69.2% to 67.6%.

- (16) *Affected Measures:* SA-4, SA-5, SA-6, SA-7 & SA-8

Description of Change: Currently, BellSouth is not including records that have updated Due Dates that do not match the due date in the SOCS Subsequent Due Date table. BellSouth proposes to modify the PMAP code to capture these records by updating the SOCS Subsequent Due Date table. (RQ8728)

Impact of Change: BellSouth continues to investigate the impact of this change.

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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2006, a copy of the foregoing document was served on the following parties, via the method indicated:

☐ Hand
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