
BellSouth Telecommunications, Inc.

Legal Department

1025 Lenox Park Boulevard

Suite 6C01

Atlanta, GA 30319-5309

lisa.foshee@bellsouth.com

Lisa S. Foshee

General Counsel - Georgia

404 986 1718

Fax 404 986 1800

October 28, 2005

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

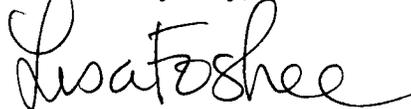
Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling, and Resale*; Docket No. 7892-U

Dear Mr. McAlister:

Please find enclosed herein an original and sixteen (16) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Eighteenth Notice of Filing Corrective Action Plan in the above-referenced docket. I would appreciate your filing this document and returning the one (1) extra copy stamped "filed" in the enclosed self-addressed and stamped envelope.

Thank you for your assistance in this regard.

Yours very truly,



Lisa S. Foshee

LSF:nvd

Enclosures

cc: Mr. Leon Bowles (via electronic mail)
Mr. Patrick Reinhardt (via electronic mail)
Parties of Record (via electronic mail)

607827/607830

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

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

**BELLSOUTH TELECOMMUNICATIONS, INC.'S EIGHTEENTH
NOTICE OF FILING CORRECTIVE ACTION PLAN**

I. INTRODUCTION

Pursuant to the Commission's January 12, 2001, November 14, 2002, January 22, 2003 and July 18, 2005 Orders, BellSouth Telecommunications, Inc. ("BellSouth") respectfully files its Eighteenth Corrective Action Plan, 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 (June, July and August 2005). BellSouth's filing identifies each of the performance measures and sub-metrics at issue with CLEC volumes of more than 30 circuits per month, 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, where applicable. Sub-metrics with CLEC volumes of 30 or less do not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

SECTION 1: OPERATIONS SUPPORT SYSTEMS (“OSS”)

OSS-1: RESPONSE INTERVAL – CLEC LOCAL EXCHANGE NEGOTIATION

SYSTEM (LENS) (PRE-ORDERING)

COFFI / Region / RNS (June, July and August)

COFFI / Region / ROS (July and August)

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 or ROS may be relatively minor (based on current data, the differential is approximately 0.6 seconds for RNS and 0.2 seconds for ROS). The average response interval for June through August 2005 for CLECs is 3.38 seconds compared with the retail analogue of 2.84 seconds for RNS and 3.16 seconds for ROS. Also, there was an average of 15,000 queries per month for the CLECs compared with over 4,000,000 per month of the retail analogue. Slight differences in response intervals in a given month do not impede a CLEC’s ability to secure information in a timely manner.

OSS-1: RESPONSE INTERVAL – CLEC TELECOMMUNICATIONS ACCESS

GATEWAY (TAG) (PRE-ORDERING)

PSIMS / Region / RNS & ROS (June, July and August)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system PSIMS (“Product/Service Inventory Management System”) by both BellSouth retail and the CLECs. The volume of CLEC queries has decreased dramatically; thus, it is not possible to perform a meaningful root cause analysis. The CLECs averaged less than

4,000 queries per month from June through August 2005, compared with the retail analogue averaging over 5,000,000. Due to the low volume of CLEC queries performed each month, a detailed system analysis is not warranted at this time.

SECTION 2: ORDERING

O-9: FIRM ORDER CONFIRMATION TIMELINESS

xDSL / Partial Electronic (July and August)

In July 2005, BellSouth returned 40 of 49 (81.6%) LSRs submitted by the CLECs within the 10 hour benchmark. In August 2005, 57 of 85 (67.1%) LSRs were returned within the benchmark. Neither of these two months met the 95% requirement for this measure. A detailed analysis of the missed LSRs has indicated that LESOG was returning the LSRs with error G6464 LSG00550. This error caused an auto clarification and by the time a service representative had retrieved the order and manually corrected it, the 10 hour benchmark had been exceeded. This error indicates the number of loops on the LFACS reservation is not equal to or exceeded the number of loops on the LSR submitted by the CLEC. Further investigation indicates an interface problem exists with LFACS in ENCORE Release 19.0 and corrective action is currently underway to correct this issue.

SECTION 3: PROVISIONING

P-2B: PERCENTAGE OF ORDERS GIVEN JEOPARDY NOTICES

UNE Digital Loops => DS1 (June, July and August)

UNE ISDN/UDC/IDSL (June and August)

While the percentage of the orders that potentially could have been missed due to a facility problem was larger than the retail analogue comparison for the above submetrics, none of these submetrics were out of parity when compared with the retail analogue for percent missed

installation appointments. Many of the jeopardies are due to incorrect address formats, etc. and are corrected within minutes of initial review.

SECTION 4: MAINTENANCE AND REPAIR

M&R-2: CUSTOMER TROUBLE REPORT RATE

UNE Digital Loops => DS1 (June, July and August)

UNE xDSL / Dispatch (June, July and August)

Resale Design (Specials) / Dispatch (June, July and August)

Resale Design (Specials) / Non Dispatch (June and August)

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 June through August 2005. BellSouth did not identify any systemic issues for any of the troubles reported in these sub-metrics.

M&R-3: MAINTENANCE AVERAGE DURATION

UNE Digital Loops >=DS1 / Dispatch (July and August)

The CLEC average duration during this period was 7.1 hours compared to 6.5 hours for the retail analogue. While this did not meet the parity requirement, the fact that all troubles were cleared within a 7 hour window and only an approximate 1/2 hour difference should not be a problem for the CLECs. With such a small number of CLEC reports, one trouble report or several quick “fixes” can have a major impact on the monthly average. With the retail analogue having over 900 trouble reports compared with 300 for the CLECs, a few long intervals or quick fixes have much less effect on the monthly average. The durations tend to decrease with the higher volumes. The durations are more about the small volumes than the actual average

completion intervals. BellSouth did not identify any “systemic” issues concerning this submetric.

UNE Digital Loops >=DS1 / Non-Dispatch (June, July and August)

The CLEC average duration during this period was 3.3 hours compared to 1.5 hours for the retail analogue. While this did not meet the parity requirement, the fact that all troubles were cleared within a 4 hour window and less than a 2 hour difference should not be a problem for the CLECs. With such a small number of CLEC reports, one trouble report or several quick “fixes” can have a major impact on the monthly average. With the retail analogue having over 1,000 trouble reports compared with less than 100 for the CLECs, a few long intervals or quick fixes have much less effect on the monthly average. The durations tend to decrease with the higher volumes. The durations are more about the small volumes than the actual average completion intervals. BellSouth did not identify any “systemic” issues concerning this submetric.

SECTION 5: BILLING

B-1: INVOICE ACCURACY

Interconnection (July and August)

During the period of June through August 2005, the CLECs and BellSouth retail received 98% invoice accuracy for this submetric. In June 2005, the CLECs received 99.89% accuracy compared with the accuracy for the retail analogue of 99.21%. In July 2005, the CLECs received 98.21% compared with the retail analogue of 98.88%. And in August 2005, the CLECs received 95.95% compared with the retail analogue of 98.65%. BellSouth’s billing department performs internal audit checks to determine the accuracy of its billing invoices. In June 2005, this audit revealed that mileage was being double billed for USOCs 1L5NL, SATCO, and TEF GH. The orders were corrected in July 2005 with the billing adjustments being processed in

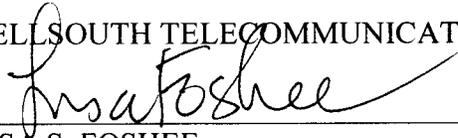
August 2005. These adjustments were the major reason for the 95.95% CLEC invoice accuracy in August 2005. With an approximate 1% difference in the comparisons in July 2005, there were no systemic issues identified for any of the adjustments reported during July.

Resale (June and August)

During the period of June through August 2005, the CLECs and BellSouth retail received 98% invoice accuracy for this submetric. In June 2005, the CLECs received 99.20% accuracy compared with the accuracy for the retail analogue of 99.21%. In July 2005, the CLECs received 99.71% compared with the retail analogue of 98.88%. And in August 2005, the CLECs received 98.22% compared with the retail analogue of 98.65%. The CLEC average for the three months was 99.04% compared with the retail analogue of 98.91%. With an approximate 0.01% difference in the comparisons in June 2005, there were no systemic issues identified for any of the adjustments reported during June. In June 2005, the internal billing audit revealed that mileage was being double billed for USOCs 1L5NL, SATCO, and TEF GH. The orders were corrected in July 2005 with the billing adjustments being processed in August 2005. These adjustments were the major reason for the 98.22% CLEC invoice accuracy in August 2005.

Respectfully submitted, this 28th day of October 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



LISA S. FOSHEE
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, GA 30319-5309
(404) 986-1718

R. DOUGLAS LACKEY
BellSouth Center – Suite 4300
675 West Peachtree Street, N.E.
Atlanta, GA 30375-0002
(404) 335-0747

CERTIFICATE OF SERVICE

Docket No. 7892-U

This is to certify that on this 28th day of October, 2005, I served a copy of the foregoing, upon known parties of record, via electronic mail as follows:

Clare McGuire, Esquire
Consumers' Utility Counsel Division
2 Martin Luther King Jr. Drive
Suite 356, East Tower
Atlanta, GA 30334
clare.mcguire@cuc.oca.state.ga.us

Daniel S. Walsh, Esquire
Assistant Attorney General
Department of Law – State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1300
dan.walsh@law.state.ga.us

Jonathan E. Canis, Esquire
Andrew M. Klein, Esquire
Kelley, Drye & Warren, LLP
1200 19th Street, N.W., Suite 500
Washington, DC 20036
jcanis@kelleydrye.com
aklein@kelleydrye.com
[Counsel for Z-Tel, KMC Telecom]

Charles A. Hudak, Esquire
Ronald V. Jackson, Esquire
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2117
chudak@fh2.com
rjackson@fh2.com
robin.jackson@twtelecom.com
carolyn.marek@twtelecom.com
chris.faix@twtelecom.com
[Counsel for Rhythms Links, Inc.,
Covad, XO Georgia, Time Warner,
MediaOne, TRA, LCI, Teleport
Communications, NewSouth, ICG
Telecom]

David I. Adelman, Esquire
Charles B. Jones III, Esquire
Hayley B. Riddle, Esquire
Sutherland Asbill & Brennan LLP
999 Peachtree Street, N.E.
Atlanta, GA 30309
david.adelman@sablaw.com
clay.jones@sablaw.com
hayley.riddle@sablaw.com
[Counsel for ITC^DeltaCom]
[Counsel for MCI]

Frank B. Strickland, Esquire
Anne W. Lewis, Esquire
Strickland Brockington Lewis LLP
Midtown Proscenium – Suite 2000
1170 Peachtree Street, N.E.
Atlanta, GA 30309
fbs@sbllaw.net
awl@sbllaw.net
[Counsel for e.spire]

Suzanne W. Ockleberry, Esquire
Senior Regional Attorney
AT&T Communications
of the Southern States, Inc.
Law & Government Affairs
1230 Peachtree Street, N.E., 4th Floor
Atlanta, GA 30309-3579
sockleberry@att.com
cbcaldwell@att.com
[Counsel for AT&T]

William R. Atkinson, Esquire
Sprint Communications Company L.P.
3065 Cumberland Blvd.
GAATLD0602
Atlanta, GA 30339
bill.atkinson@mail.sprint.com
[Counsel for Sprint Communications
Company L.P.]

Rose Mulvany Henry, Esquire
Birch telecom of the South, Inc.
2020 Baltimore Avenue
Kansas City, MO 65109
rmulvany@birch.com
[Counsel for Birch Telecom]

Anne F. Gerry, Esquire
Arnall, Golden & Gregory, LLP
171 17th Street
Suite 2100
Atlanta, GA 30363
anne.gerry@agg.com
[Counsel for Broadslate Networks,
Globe Communications, Knology]

Mark M. Middleton, Esquire
Mark M. Middleton, P.C.
1100 Peachtree Street, Suite 380
Atlanta, GA 30309
mark@middletonlaw.net
[Counsel for Cable Television
Association of Georgia]

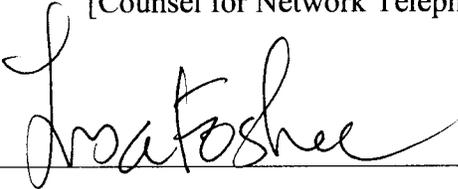
Newton M. Galloway, Esquire
Galloway & Lyndall, LLP
The Lewis Mill House
406 North Mill Street
Griffin, GA 30223
ngalloway@gallyn-law.com
[Counsel for Birch Telecom, US LEC,
SECCA]

Walt Saprnov, Esquire
Gerry & Saprnov LLP
3 Ravinia Drive
Suite 1455
Atlanta, GA 30346
info@gstelecomlaw.com
[Counsel for Multitechnology,
Powertel, NEXTEL, Access Integrated]

Dulaney L. O’Roark, III, Esquire
MCI, Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
de.oroark@mci.com
[Counsel for MCI]

Charles E. Watkins, Esquire
Covad Communications Company
1230 Peachtree Street, N.E.
19th Floor, Promenade II
Atlanta, GA 30309
gwatkins@covad.com
jbelle@covad.com
[Counsel for Covad Communications]

Margaret Ring, Esquire
Director Regulatory
& Governmental Affairs
Network Telephone
815 South Palafox Street
Pensacola, FL 32501
margaret.ring@networktelephone.net
[Counsel for Network Telephone]



607830