
BellSouth Telecommunications, Inc.

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January 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:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the February 2004 data month and a Preliminary Notification Report for the data month of March 2004. These proposed changes will be discussed at the January 8, 2004 industry conference call.

There are three additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its September 2003 Data Notification filed on August 1, 2003, BellSouth provided notice of changes to the sequence of data fields from BellSouth's source systems for calculating Measures OSS-1, OSS-2, and Pre-Ordering and Ordering Measures in connection with Encore Release 13.2 (Item 3). These changes were partially implemented with September 2003 data, but additional work necessary to implement these changes will be completed with December 2003 data.

Second, in its October 2003 Data Notification filed on September 2, 2003, BellSouth provided notice of the use of a new time stamp under certain circumstances in calculating performance for measures O-1, O-2, O-7, O-8, O-9, O-11, O-13, O-14 & O-15 (Item 1). This change was partially implemented with October 2003 data, but additional work necessary to implement this change will be completed with December 2003 data.

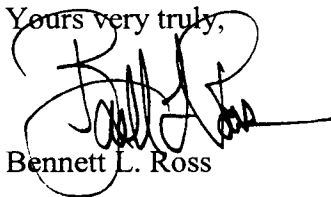
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Third, in its November 2003 Data Notification filed on October 1, 2003, BellSouth provided notice of changes to the sequence of data fields from BellSouth's source systems for calculating Measures OSS-1, OSS-2, and Pre-Ordering and Ordering Measures in connection with Encore Release 14.0 (Item 1). These changes were partially implemented with November 2003 data, but additional work necessary to implement these changes will be completed with December 2003 data.

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read "Bennett L. Ross", written over a circular stamp or mark.

Bennett L. Ross

BLR:nvd
Enclosures

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

5200110/520032/520033

PROPOSED FEBRUARY 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the February 2004 data month. Results for the February 2004 data month will be posted as follows:

Preliminary results March 20, 2004
Final results March 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. 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.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 15.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported. This proposed change was Item (1) on the Preliminary February Data Notification filed on December 1, 2003.

Impact of Change: None.

- (2) *Affected Measures:* O-7, O-8, O-9 & O-11 (Florida and Tennessee only)

Description of Change: Currently, UNE combinations of loop, transport, and multiplexer are counted as UNE Combo-Other. BellSouth proposes to report these products in the EEL disaggregations as opposed to UNE Combo-Other disaggregation. This proposed change was Item (2) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4388)

Impact of Change: For September 2003, on the Non-Mechanized FOC and Reject Completeness report, the results for UNE Combo would remain 100%. For EELs, the result would increase from 95.19% to 95.64%. Fully Mechanized and Partially mechanized LSRs were not impacted.

Provisioning Measurements

- (3) *Affected Measures:* P-1, P-2A, P-2B, P-3, P-4, P-5, P-6 & P-9 (Florida and Tennessee only)

Description of Change: Currently, UNE combinations of loop, transport, and multiplexer are counted as UNE Combo-Other. BellSouth proposes to report these products in the EEL disaggregations as opposed to UNE Combo-Other disaggregation. This proposed change was Item (4) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4388)

Impact of Change: For September 2003, the OCI for EELs products would have changed by less than 0.3 days and PMIA would have changed by 0.25%.

- (4) *Affected Measures:* P-3 (Florida and Tennessee only)

Description of Change: Currently, service orders that are cancelled after the due date are being reported in the data for months subsequent to the correct reporting month. Such orders are reported in each subsequent month until a two-month period elapses where the order has no activity, a condition that causes the order to be purged. BellSouth proposes to only include service orders cancelled after the due date in the data for the month in which the order is cancelled. This proposed change was Item (5) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4585)

Impact of Change: For August 2003, 0.6% of service orders in Florida and Tennessee were included in the data incorrectly.

- (5) *Affected Measures:* All Provisioning Measures

Description of Change: Certain field identifiers (FIDs) that correspond to ADSL products are not being classified as ADSL. BellSouth proposes to correct this problem. This proposed change was Item (6) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4624)

Impact of Change: For August 2003, 104 wholesale and retail records in the region would be considered ADSL products, which is an increase of .10% in the number of ADSL records.

M&R Measurements

- (6) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5 (Alabama, Georgia, Kentucky, Mississippi, and South Carolina only)

Description of Change: BellSouth currently reports a separate disaggregation for the UNE Digital Loop, < DS1 and UNE Digital Loop, >=DS1 products that is not required by the SQM. BellSouth proposes to remove this product disaggregation. This proposed change was Item (7) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4427)

Impact: None.

(7) *Affected Measures:* MR-2

Description of Change: Currently, BellSouth is over-counting lines for 2-wire analog loop non-design. Due to a change in the source system data, each end of the circuit is being counted as an individual line. BellSouth proposes to correct this problem. This proposed change was Item (8) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4664)

Impact of Change: CLEC CTRR for 2-wire analog loops non-design will approximately double.

(8) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: Currently, some CLEC records have either an invalid or null OCN code. BellSouth cannot therefore identify the proper company on the records. BellSouth proposes to use the ACNA code on the records to determine the correct company id where the OCN value is invalid or null. This proposed change was Item (9) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4674)

Impact of Change: Change to CTRR is less than half of one percent.

(9) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5 (Florida)

Description of Change: Currently, the wire center lookup table has an embedded hyphen in JAY, FL and GAY, GA., which prevents BellSouth from identifying the wire center for trouble tickets and line counts in those cities. BellSouth proposes to insert a hyphen into codes on the data records to match the CLLI code for wire center determination. This proposed change was Item (10) on the Preliminary February Data Notification filed on December 1, 2003. (RQ4709)

Impact of Change: Negligible impact on results. For September 2003, there would have been an increase of .002 % for CTRR.

Billing Measurements

(10) *Affected Measures:* B-9 & B-10

Description of Change: The err_msg_cd column will be removed from the raw data because it is not used to calculate the measurement results. This proposed change was Item (11) on the Preliminary February Data Notification filed on December 1, 2003. (RQ3631)

Impact of Change: None.

520032

PRELIMINARY MARCH 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the March 2004 data month. Results for the March 2003 data month will be posted as follows:

Preliminary results April 20, 2004
Final results April 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. 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.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* O-8 & O-9

Description of Change: Currently, in some cases, Non-Mechanized LSRs with multiple Clarifications or FOCs are counted twice. This occurs when a FOC/Reject is re-faxed to the CLEC from a service representative in the eastern-time zone. In this scenario, the re-faxed FOC /Reject appears as a new FOC/Reject. The response interval for this "new" FOC /Reject is measured from the receipt time of the original LSR minus one hour until the time that the re-faxed FOC/Reject is sent. BellSouth proposes to correct this problem. (RQ4785)

Impact of Change: For October 2003, the performance of Non-Mechanized Reject Interval will increase by 0.17%.

- (2) *Affected Measures:* OSS-1 (North Carolina)

Description of Change: Currently, the PMAP historical reports calculate OSS-1 for North Carolina in accordance with the Georgia SQM instead of the North Carolina SQM. The current one-month reports are correct. BellSouth proposes to calculate historical North Carolina data in accordance with the North Carolina SQM. (RQ4788)

Impact of Change: Historical reports will be generated in accordance with the North Carolina SQM.

Provisioning Measurements

- (3) *Affected Measures:* P-3, P-4 & P-9

Description of Change: BellSouth proposes adding new fields, FIRST_CPX_STS_DTTM, SO_KEY and OCI_END_DT) to the raw data and Other Supporting Data File. The addition of these fields will have no immediate impact on replicating the SQM reports but would be available for use with future enhancements. (RQ4312)

Impact of Change: None.

- (4) *Affected Measures:* P-6 (Louisiana)

Description of Change: BellSouth currently reports Completion Attempts Without Notice in Louisiana, which is not required by the SQM. BellSouth proposes to stop producing this report. (RQ4739)

Impact of Change: None.

- (5) *Affected Measures:* P-5 (all states) & P-9 (Alabama, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, and South Carolina)

Description of Change: Currently, BellSouth is reporting xDSL products in 3 separate buckets, UNE xDSL with conditioning, UNE xDSL, without conditioning and UNE xDSL (HDSL, ADSL, and UCL). Orders in the "with and without Conditioning" disaggregations are repeated in the UNE xDSL disaggregation. The only disaggregation required by the SQM is the UNE xDSL (HDSL, ADSL, and UCL). BellSouth proposes eliminating the UNE xDSL "with and without Conditioning" disaggregation to comply with the SQM. (RQ4748)

Impact of Change: None.

- (6) *Affected Measures:* P-11 (Alabama, Mississippi, North Carolina, South Carolina, Kentucky, and Louisiana)

Description of Change: Currently, the process for producing regional Service Order Accuracy reports is manual. BellSouth proposes loading the data into the PMAP warehouse and producing the measure mechanically. (RQ4752)

Impact of Change: None.

- (7) *Affected Measures:* P-3, P-4, P-4B, P-5 & P-9

Description of Change: Currently, BellSouth is displaying all disaggregations for ACNI, PMIA, OCI and PT30 as “Dispatch,” “Non-Dispatch,” “Non-Dispatch (Dispatch In)” and “Non-Dispatch (Switch Based).” The SQMs only require these disaggregations for a subset of the products. BellSouth proposes displaying data in a manner consistent with the SQM. (RQ4772)

Impact of Change: None.

- (8) *Affected Measures:* P-3, P-4 & P-4B (Florida and Tennessee)

Description of Change: Currently BellSouth is reporting, xDSL products in 3 separate buckets; UNE xDSL, with conditioning, UNE xDSL, without conditioning and UNE xDSL (HDSL, ADSL, and UCL). Orders in the “with and without conditioning” disaggregations are repeated in the UNE xDSL disaggregation. The only disaggregations required by the SQM are the UNE xDSL (HDSL, ADSL, and UCL) with and without conditioning. Bellsouth proposes eliminating the UNE xDSL (HDSL, ADSL, and UCL) disaggregation to comply with the SQM. (RQ4828)

Impact of Change: None

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PARTIES OF RECORD

Docket No. 7892-U

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(12/29/03)