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

August 1, 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 Seventeenth 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)

5595248/595010

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

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

I. INTRODUCTION

Pursuant to the Commission's January 12, 2001, November 14, 2002 and January 22, 2003 Orders, BellSouth Telecommunications, Inc. ("BellSouth") respectfully files its seventeenth 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 (March, April, and May 2005). BellSouth's filing identifies each of the performance measures and sub-metrics at issue, 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.

SECTION 1: OPERATIONS SUPPORT SYSTEMS ("OSS")

OSS-1: RESPONSE INTERVAL – CLEC LOCAL EXCHANGE NEGOTIATION SYSTEM (LENS) (PRE-ORDERING)

COFFI / Region / RNS (March, April, and May)

COFFI / Region / ROS (March and April)

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 0.7 seconds for RNS and 0.1 seconds for ROS). The average response interval for March through May 2005 for CLECs is 3.39 seconds compared with the retail analogue of 2.72 seconds for RNS and 3.29 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 (March, April, and May)

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 3,000 queries per month from March and May 2005, compared with the retail analogue averaging over 4,000,000. Due to the low volume of CLEC queries performed each month, a detailed system analysis is not warranted at this time.

OSS-4: RESPONSE INTERVAL (MAINTENANCE & REPAIR)

LMOSupd / <= 4 sec. / Region (March, April, and May)

LMOSupd / <= 10 sec. / Region (March, April, and May)

LMOSupd / > 10 sec. / Region (March, April, and May)

This measure captures the legacy system access times for Maintenance and Repair OSS for the Loop Maintenance Operations System update ("LMOSupd") system. While results for these sub-metrics vary between the CLECs and BellSouth retail, these results reflect that the significant majority of CLEC transactions are being rapidly returned. For March through May 2005, over 97% of CLEC transactions were returned in 4 seconds or less, and more than 99% of CLEC transactions were returned in 10 seconds or less. Given such performance, any slight differences with BellSouth retail does not impede a CLEC's ability to secure information in a timely manner.

SECTION 2: ORDERING

O-3: FLOW-THROUGH

UNE Other (March and April)

BellSouth met 10,203 of 12,140 LSRs in March (84.04%), 8331 of 10,140 LSRs in April (82.16%) and 10,119 of 11,585 LSRs in May (87.35%). In Encore Release 18.0, a programming error caused the download file name in the Routing Adapters to be mismatched with the sent file name from LESOG. This caused the LSRs in LESOG to not flow through and have to be handled on a manual basis. This mismatch was identified as Encore defect D39351 and corrected by a maintenance repair on 05/07/2005. BellSouth met the 85% benchmark in May 2005.

O-8: REJECT INTERVAL

Resale Residence / Electronic (March, April, and May)

There were only a total of 17 LSRs rejected during the three month period of March through May 2005. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

UNE Line Sharing / Electronic (March, April, and May)

There were only a total of 32 LSRs rejected during the three month period of March through May 2005. BellSouth's root cause analysis has revealed that with the addition of the mechanized jeopardy feature added in Encore Release 17.0 at the end of November 2004, the PMAP data has been skewed and is incorrectly classifying these orders as fully mechanized when if fact they should be in the partial mechanized domain. The correction for this issue is currently being planned for July 2005 data.

UNE Loop + Port Combinations / Electronic (March and May)

In March 2005, BellSouth returned 668 of the 699 mechanized rejected LSRs within the 1 hour benchmark and 216 of 223 in May. The March results only missed the 97% benchmark by 10 of 699 rejected LSRs and 1 of 223 in May. There were no systemic issues identified for the small number of LSRs that missed the one-hour benchmark.

2-Wire Analog Loop Design / Manual (March and April)

There were only a total of 12 LSRs rejected with BellSouth meeting the 1-hour benchmark for 10 LSRs during the two month period of March through April 2005. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

2-Wire Analog Loop Non Design / Partial Electronic (March and April)

LNP (Standalone) / Partial Electronic (March and April)

UNE Combo – Other / Partial Electronic (March, April, and May)

UNE ISDN / Partial Electronic (March and April)

The majority of these submetrics were missed due to the small volumes of LSRs rejected during the period. For example, in April 2005 BellSouth returned 18 of 21 rejected LSRs for 2-Wire Analog Loops Non Design within the 7 hour benchmark for 85.71%. However, 19 of 21 were required to meet the 90% benchmark. BellSouth has improved in the partial mechanized area as evident by the reduction of submetrics missed in this 3 month period and will continue to work to meet this very stringent 90% in 7 hour benchmark.

UNE Other Design / Partial Electronic (March, April, and May)

In March 2005, BellSouth returned 83 of 115 rejected LSRs within the 7-hour benchmark, 85 of 115 in April and 113 of 132 in May. A detailed analysis of the rejected LSRs that did not meet the 7-hour benchmark has indicated two issues that are currently under investigation. The first issue indicated that responses were initiated by the service representative but not captured by the PMAP system. The second issue revealed that the Encore system was returning an auto-FOC in error when a reject should have been issued. Both of these issues are being reviewed to determine the proper resolution.

O-9: FIRM ORDER CONFIRMATION TIMELINESS

Combo Other / Electronic (March and April)

EELs / Electronic (March and April)

BellSouth returned 7 of 11 FOCs within the 3-hour benchmark in March, 10 of 11 in April and 30 of 30 in May 2005. (Misses for Combo Other and EELs are the same exact PONs,

which are counted for both sub-metrics.). It is not possible to perform a meaningful root cause analysis on such a small universe of transactions for March and April data months. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

UNE Local Transport / Manual (March and May)

BellSouth returned 4 of 5 FOCs within the 24-hour benchmark in March 2005 and 8 of 9 in May 2005. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

Resale Centrex / Manual (March and April)

BellSouth returned 1 of 2 FOCs within the 24-hour benchmark in March and 0 of 1 in April 2005. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

Resale PBX / Manual (March, April, and May)

BellSouth returned 4 of 5 FOCs within the 24-hour benchmark in March, 1 of 2 in April and 10 of 11 in May 2005. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

Resale Business / Manual (March and April)

BellSouth returned 37 of 39 FOCs within the 24-hour benchmark in March and 26 of 28 in April 2005. It is not possible to perform a meaningful root cause analysis on such a small universe of missed transactions. In both months, BellSouth failed to return only 2 LSRs within

the benchmark; however, it was allowed only one missed LSR and still meet the 95% requirement.

Combo Other / Partial Electronic (March and April)

EELs / Partial Electronic (March and April)

xDSL / Partial Electronic (March, April, and May)

2W Analog Loop w/LNP Non Design / Partial Electronic (March, April, and May)

2W Analog Loop Non Design / Partial Electronic (March and April)

2W Analog Loop w/LNP Design / Partial Electronic (March and April)

UNE Other Design / Partial Electronic (March and April)

UNE Other Non Design / Partial Electronic (March and April)

LNP (Standalone) / Partial Electronic (March and April)

Resale Business / Partial Electronic (March and May)

While the above submetrics did not meet the 90% benchmark, major improvement in their overall performance indicates most months averaged above 85%. BellSouth is still investigating two issues. Some of the FOCs are not being handled by the service representatives within the 7 hour benchmark. BellSouth is performing additional reviews with individual employees to improve performance. Also, a number of LSRs are being auto clarified in error and must be corrected manually by a service representative but have surpassed the 7 hours benchmark. BellSouth continues to review these items for resolution.

O-10: SERVICE INQUIRY WITH FOC

Unbundled Interoffice Transport (March and May)

BellSouth returned 0 of 1 inquiry within the 3-hour benchmark in March, 1 of 1 in April and 2 of 3 in May 2005. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

O-11: FIRM ORDER CONFIRMATION AND REJECT RESPONSE COMPLETENESS

Combo Other / Partial Electronic (March and April)

This submetric continues to perform at a level of 96% with a confirmation being provided for 1300 of 1355 submitted LSRs during the period of March through May 2005. As stated in previous filings, one of the major issues that affects this measure relates to numerous versions of the same LSR being filed by the CLEC within minutes and LSRs received at the end of the month with the FOC or Reject returned in the following month. When a CLEC submits multiple versions of an LSR within minutes, only the last LSR receives a response. All previous versions do not receive a response and therefore are counted as "missed" responses. BellSouth continues to review the data for the sub-metrics that did not meet the 97% benchmark.

UNE ISDN / Manual (March and May)

BellSouth returned 22 of 23 responses in March and 25 of 26 in May 2005. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions. With less than 30 LSRs and a 97% benchmark, BellSouth is not allowed any missed responses to meet the parity requirement. Also, when a CLEC submits multiple versions of an LSR within

minutes, only the last LSR receives a response. All previous versions do not receive a response and therefore are counted as "missed" responses.

SECTION 3: PROVISIONING

P-2B: PERCENTAGE OF ORDERS GIVEN JEOPARDY NOTICES

2W Analog Loop Non Design (March, April, and May)

UNE Combo Other (March, April, and May)

UNE Digital Loops => DS1 (March, April, and May)

UNE ISDN (March, April, and May)

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.

P-4A: AVERAGE COMPLETION INTERVAL (OCI) AND ORDER COMPLETION INTERVAL DISTRIBUTION

UNE Other Non-Design / < 10 Circuits / Non Dispatch (March, April, and May)

Since this submetric consists mainly of all non-designed products that are not included in the other submetrics, it is almost impossible to determine what, if any issues are causing it to be out of parity. BellSouth has proposed that this submetric be considered a "diagnostic" measure in its latest SQM proposals.

UNE Combo Other / < 10 Circuits / Dispatch (March, April, and May)

BellSouth has determined two issues that adversely impact BellSouth's ability to meet the retail analogue comparison for this submetric. First, the CLEC participants in the industry workshops represented that they would be ordering significant quantities of voice grade EELs (DS0 level), which do not take long to provision. However, in reality CLECs in Georgia are not ordering any voice grade EELs, and the vast majority of the CLEC orders for EELs are at DS1 levels, which take longer to provision. There were 1897 EELs orders by the CLECs in Georgia in 2004 and none of these orders were at the DS0 level. Second, the performance data for these sub-metrics include EELs when the loop and transport facilities necessary to provision the circuit are not available or when the EEL is at a DS3 level and higher, which generally have provisioning intervals that are considerably longer than five or eight days.

Nevertheless, Bellsouth has reduced the standard interval from 10 days to 7 days in an attempt to meet the Commission's benchmarks. BellSouth will continue to monitor performance to determine what, if any, additional provisioning changes can be made to ensure compliance with these benchmarks.

UNE ISDN / < 10 Circuits / Non-Dispatch (March, April, and May)

BellSouth is unable to determine at the time of the FOC whether the order will require a dispatch or not. Therefore, these orders are scheduled with a dispatch interval that will always be longer than the non-dispatched analogue. BellSouth would have met the parity requirement, if compared with the dispatch retail analogue.

UNE UDC/IDSL / < 10 Circuits / Non-Dispatch (March, April, and May)

BellSouth is unable to determine at the time of the FOC whether the order will require a dispatch or not. Therefore, these orders are scheduled with a dispatch interval that will always

be longer than the non-dispatched analogue. BellSouth would have met the parity requirement, if compared with the dispatch retail analogue.

EELs / < 10 Circuits / Dispatch 30% 5 days (March, April, and May)

EELs / < 10 Circuits / Non Dispatch 30% 5 days (March, April, and May)

BellSouth has determined two issues that adversely impact BellSouth's ability to meet the Commission's benchmarks for EEL provisioning of 30% within 5 days. First, these benchmarks were established after CLEC participants in the industry workshops represented that they would be ordering significant quantities of voice grade EELs (DS0 level), which do not take long to provision. However, in reality CLECs in Georgia are not ordering any voice grade EELs, and the vast majority of the CLEC orders for EELs are at DS1 levels, which take longer to provision. There were 1897 EELs orders by the CLECs in Georgia in 2004 and none of these orders were at the DS0 level. Second, the performance data for these sub-metrics include EELs when the loop and transport facilities necessary to provision the circuit are not available or when the EEL is at a DS3 level and higher, which generally have provisioning intervals that are considerably longer than five or eight days.

Nevertheless, Bellsouth has reduced the standard interval from 10 days to 7 days in an attempt to meet the Commission's benchmarks. BellSouth will continue to monitor performance to determine what, if any, additional provisioning changes can be made to ensure compliance with these benchmarks.

Digital Loops < DS1 / < 10 Circuits / Dispatch (March, April, and May)

Digital Loops < DS1 / < 10 Circuits / Non-Dispatch (March, April, and May)

The wholesale results did not meet the parity comparison in March through May 2005. The initial root cause analysis indicated that the major reason for this sub-metric not meeting the

parity requirement is the difference in intervals for the retail analogue circuits compared with the CLEC products. The current recommended standard wholesale interval for the products included in this sub-metric range from 5 days to 10 days, currently averaging closer to the 10-day interval. The retail analogue for this product currently averages between 4 and 5 days. BellSouth meets the majority of the scheduled installations for this product as indicated by the %MIA sub-metric. BellSouth continues to look for ways to reduce the CLEC interval for these products, however with many of the wholesale circuits being new locations compared with additional circuits being added to existing locations for the retail analogue, these intervals will continue to be longer for the CLEC circuits.

P4B: FIRM ORDER AVERAGE COMPLETION (OCI) INTERVAL & ORDER COMPLETION INTERVAL DISTRIBUTION

UNE Other Non-Design / < 10 Circuits / Non Dispatch (March, April, and May)

UNE Combo Other / < 10 Circuits / Dispatch (March, April, and May)

UNE ISDN / < 10 Circuits / Non-Dispatch (March, April, and May)

UNE UDC/IDSL / < 10 Circuits / Non-Dispatch (March, April, and May)

EELs / < 10 Circuits / Dispatch 30% 5 days (March, April, and May)

EELs / < 10 Circuits / Non Dispatch 30% 5 days (March, April, and May)

Digital Loops < DS1 / < 10 Circuits / Dispatch (March, April, and May)

Digital Loops < DS1 / < 10 Circuits / Non-Dispatch (March, April, and May)

See responses for Measure P4A above, which are equally applicable to these sub-metrics.

P-9: % PROVISIONING TROUBLES WITHIN 30 DAYS OF SERVICE ORDER COMPLETION

Resale Residence / < 10 Circuits / Non Dispatch (March and May)

The CLEC provisioning troubles during this period was 5% compared to 4% for the retail analogue. The CLEC volume of completed orders averaged approximately 5,000 compared with over 350,000 orders for the retail analogue. While this did not meet the parity requirement, the fact that all customers both wholesale and retail received 95% trouble free service during the period and the fact that the retail volume is over 70 times larger than the CLEC, should not be a problem for the CLECs.

UNE Digital Loops >=DS1 / < 10 Circuits / Non Dispatch (March and April)

In March 2005, the CLECs reported 2 troubles for 12 installations and reported 2 troubles for 19 installations in April 2005. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions.

P-13: % LNP DISCONNECT TIMELINESS

P-13B: % Disconnect Trigger Orders Prior to Due Date (March and April)

BellSouth missed the benchmark for this submetric for March and April 2005. The benchmark for this sub-metric is 96.5% prior to the due date. This measure has large quantities of telephone numbers tied to one service order. Missing only one service order can reduce the percentage by a large portion. In the majority of the sub-metrics, one or two service orders being missed is the reason the sub-metric does not meet the 96.5% benchmark. BellSouth continues to focus on meeting the benchmarks for these measures.

P-13D: % Disconnect Timeliness Interval for Non Trigger Orders (March, April, and May)

BellSouth missed the benchmark of 12 hours for this submetric for March through May 2005. The benchmark for this sub-metric is 95% within 12 hours. This measure has large quantities of telephone numbers tied to one service order. Missing only one service order can reduce the percentage by a large portion. In the majority of the sub-metrics, one or two service orders being missed is the reason the sub-metric does not meet the 95% benchmark. BellSouth continues to focus on meeting the benchmarks for these measures.

SECTION 4: MAINTENANCE AND REPAIR

M&R-1: PERCENT MISSED REPAIR APPOINTMENTS

UNE Loop + Port Combinations / Non Dispatch (March, April, and May)

There was less than a 1% difference in missed appointment rates during the period of March through May 2005. With an average of less than 1,500 repair appointments a month, the CLEC averaged missed appointment rate was 2.5% compared with a retail analogue rate of 1.6% with over 23,000 average appointments a month. Such a small variation in rates, considering the major difference in volumes, such not be an issue with the CLECs.

M&R-2: CUSTOMER TROUBLE REPORT RATE

Resale Residence / Dispatch (March and May)

Design (Specials) / Dispatch (March, April, and May)

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

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

Combo Other / Dispatch (March, April, and May)

Ninety eight percent (98%) of all in-service lines were trouble free during the period of March through May 2005. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period. The major difference in this comparison is the large volume difference. The retail analogue averages over 3.3 million compared with 10,000 for the CLEC volume. Furthermore, the majority of the circuits in the analogue are POTS compared with the CLEC circuits that consist mainly of EELs, which are much more complex and have a higher report rate than the basic service of the analogue.

UNE xDSL / Dispatch (March, April, and May)

Over 99% of all in-service lines were trouble free during the period of March through May 2005. The vast majority of customers – both wholesale and retail – received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period.

UNE Line Sharing / Dispatch (March and April)

Over 99% of all in-service lines were trouble free during the period of March through May 2005. The vast majority of customers – both wholesale and retail – received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period.

Other Design / Dispatch (March, April, and May)

Over 98% of all in-service lines were trouble free during the period of March through May 2005. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period. The major difference in parity is due to the difference in volumes for the retail compared with the wholesale. The retail analogue is approximately 36 times larger in volume compared with the CLEC volumes.

UNE Digital Loop <DS1 / Dispatch (March, April, and May)

UNE Digital Loop ≥DS1 / Dispatch (March, April, and May)

Over 98% of all in-service lines were trouble free during the period of March through May 2005. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period.

M&R-3: MAINTENANCE AVERAGE DURATION

Digital Loops >=DS1 / Non-Dispatch (April and May)

The CLEC average duration during this period was 2.2 hours compared to 1.4 hours for the retail analogue. While this did not meet the parity requirement, the fact that all troubles were cleared within a 3 hour window and only an approximate 1 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 800 trouble reports, 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 xDSL / Non Dispatch (April and May)

There were only a total of 27 reported troubles for this submetric in April and May 2005. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

UNE Line Sharing / Non Dispatch (March and May)

There were only a total of 29 reported troubles for this submetric in March and May 2005. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

SECTION 5: BILLING

B-1: INVOICE ACCURACY

Resale (March and May)

During the period of March through May 2005, the CLECs and BellSouth retail received 98% invoice accuracy for this submetric. In March 2005, the CLECs received 98.86% accuracy compared with the accuracy for the retail analogue of 98.95%. In May 2005, the CLECs received 96.97% compared with the retail analogue of 97.98%. With an approximate 1% difference in the comparisons, there were no systemic issues identified for any of the adjustments reported during the period.

SECTION 7: DATABASE UPDATE INFORMATION

D3: PERCENT NXXS AND LRNS LOADED BY THE LERG EFFECTIVE DATE

% NXXs / LRNs loaded by LERG effective date (April and May)

In April 2005, BellSouth loaded 15 of 16 NXXs on time and 39 of 41 in May 2005. With a 100% benchmark, BellSouth is not allowed any missed items. There were 2 missed NXXs in Alabama and 1 in Florida for the entire 3-month period. No NXXs were missed by the LERG effective date in Georgia during the April and May time frame.

SECTION 11: CHANGE MANAGEMENT

CM-6: SOFTWARE ERRORS CORRECTED WITH "X" DAYS

Region / Corrected within 10 Business Days (March, April, and May)

Region / Corrected within 30 Business Days (March, April, and May)

Region / Corrected within 45 Business Days (March, April, and May)

BellSouth did not meet the 95% benchmark for any of the above submetrics during the March through May 2005 time period. As of the end of May 2005, there were a total of 23 type 6 change requests pending past the benchmark dates. A total of 7 severity 2, 14 severity 3, and 2 severity 4 requests make up the 23 type 6 change requests.

While below the Commission's 95% benchmark, BellSouth's defect correction performance is increasing, particularly given the relatively limited number of defects in BellSouth's software releases. During 2004, BellSouth reduced the average interval from defect validation to correction by 50% and continues to look for ways to reduce this interval further. However, with a 95% benchmark and a limited number of defects per severity type, it will require perfection to meet this benchmark.

CM-11: PERCENT CHANGE REQUESTS IMPLEMENTED WITH 60 WEEKS

Region / Type 4 (March, April, and May)

There was only one scheduled change request during the three month period. With a 95% benchmark, BellSouth must make 100% of all implementation dates to meet parity. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

Respectfully submitted, this 1st day of August 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 1st day of August 2005, I served a copy of the foregoing, upon known parties of record, via electronic mail as follows:

Ms. Christiane L. Sommer, Director
Consumers' Utility Counsel Division
2 Martin Luther King Jr. Drive
Suite 356, East Tower
Atlanta, GA 30334
tiane.sommer@cuc.oca.state.ga.us
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
[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]

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]

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.]

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]

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

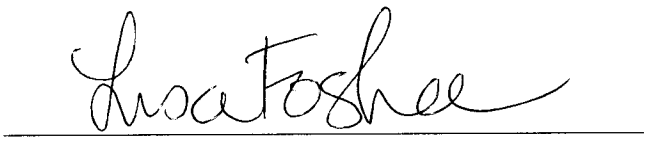
Walt Sapronov, Esquire
Gerry & Sapronov LLP
3 Ravinia Drive
Suite 1455
Atlanta, GA 30346
wsapronov@wstelecomlaw.com
[Counsel for Multitechnology,
Powertel, NEXTEL, Access Integrated]

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]

Kennard B. Woods, Esquire
MCI, Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
ken.wood@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
jbell@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]



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