

Executive Summary

In the attached documents BellSouth responds to the Commission Staff's data request dated August 8, 2003. The data request asked BellSouth to provide only a few, seemingly simple responses. The requests were as follows:

1. Explain how BellSouth's December 16, 2002 proposal differs from what has been adopted in Georgia.
2. Provide a plan and any supporting rationale for resolving the penalties held in abeyance for P-13 LNP Disconnect Timelines. Include a detailed ...

Preparing a response proved to be extremely laborious and required a tremendous amount of text – over 500 pages. Because of the detail involved and because the basic structure of the plans is outdated, BellSouth believes the Commission should not become mired in the details herein. By placing an emphasis on the current plans being compared, the Commission would be focused on a tremendous amount of detail for plans that were in reality, drafted over three years ago. An alternative to this approach would be to allow the current SQM and SEEM plans to remain in place until an improved and streamlined approach can be implemented based on actually measuring parity and the wholesale customer's quality of service.

The Commission can quickly review the record to see that much has happened in the course of three years. BellSouth has continued to open its doors to competition. The record demonstrates that BellSouth has not only provided its wholesale customer's service performance on par with its retail customers, but over the course of three years has improved its delivery performance.

BellSouth takes great pride in its service delivery performance, in fact setting the bar for others to match. This pride is maintained for all customers, be they retail or wholesale. The service quality measurements that are a part of BellSouth's current plan and what has been recently adopted in Georgia are, in BellSouth's opinion, outdated and hinder the true intent of the plans. As an example, the current plan contains too many measurements (81) and far too many sub measures (2354). It is easy to get lost in the trees without seeing the forest when trying to measure such minutia.

BellSouth believes it is time to step back and consider concentrating on a smaller set of critical, customer impacting measurements. BellSouth further believes that neither the plan it proposed in December 2002 nor the plan adopted in Georgia address the true realities. An improved plan will better serve all parties involved – the State Commissions, BellSouth’s wholesale customers, and BellSouth.

Until an updated plan can be developed and considered, BellSouth requests that the Commission continue with the existing measurements and performance plans, adopt the P-13 Local Number Portability (LNP) as proposed herein, and not spend its valuable time in a detailed review of an outdated alternative.