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April 30, 2003

DELIVERED BY HAND

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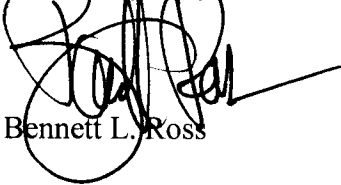Atlanta, Georgia   30334-5701

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

Dear Mr. McAlister:

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Eighth Notice of Filing Corrective Action Plans in the above-referenced docket. I would appreciate your filing this document and returning the two (2) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Yours very truly,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Parties of Record

488176/488163

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

BELLSOUTH TELECOMMUNICATIONS, INC.'S EIGHTH NOTICE OF FILING CORRECTIVE ACTION PLANS

I. INTRODUCTION

Pursuant to the Commission's January 12, 2001 Order, BellSouth Telecommunications, Inc. ("BellSouth") respectfully files its eighth corrective action plans, 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 (December 2002, January and February 2003). 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 plans, where applicable.

SECTION 1: OPERATIONS SUPPORT SYSTEMS (OSS)

OSS-1: RESPONSE INTERVAL – CLEC (LENS) (PRE-ORDERING)

COFFI / Region / RNS (D.1.3.6.1) (December, January & February)

COFFI / Region / ROS (D.1.3.6.2) December, January & February

These sub-metrics capture the response interval for access to the pre-ordering legacy system COFFI by both BellSouth retail and Competing Local Exchange Carriers ("CLECs").

The response interval for access to both of these legacy systems has deteriorated, and BellSouth's root cause analysis has identified two reasons for the problem. First, ENCORE Release 10.6 implemented in August 2002 negatively impacted COFFI queries by moving the first level validations from TAG to the Programmable Rules Engine (PRE) system that communicates with ServiceGate Gateway (SGG). PRE and SGG work together, with PRE providing the first level of validation of transactions, while SGG validates and maps the Local Service Requests ("LSRs") into order format. The communication between PRE and SGG was originally single threaded, which caused delays in response timeliness from COFFI. Additional threads have been added, which has resulted in some improvement.

Second, performance suffered because the Due Date Calculator (DDC), to which DSAP queries are a key input, continued to be architecturally configured to communicate with the TAG servers. With ENCORE Release 11.0, which was implemented on December 29, 2002, the DDC has been moved to communicate directly with the SGG servers, which resulted in a slight improvement in performance. Currently, the difference in the response intervals for CLECs and for BellSouth retail using RNS and for ROS is 1.0 and 0.5 seconds, respectively. Such a minor difference should not be a major issue for the CLECs in the ordering of service, although BellSouth continues to review the interface for this system.

OSS-4: RESPONSE INTERVAL (MAINTENANCE & REPAIR)

CRIS / <= 4 sec./ Region (D.2.4.1) (December, January & February)

This measure captures the legacy system access times for Maintenance and Repair Operational Support Systems ("OSS"). BellSouth reports its response interval performance based on the percentage of responses received in four seconds or less, the percentage of

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responses received in ten seconds or less, and the percentage of responses received in more than ten seconds. The timeliness of BellSouth's responses cannot be gauged simply by referring only to the "four seconds or less" interval, since looking at only one of these intervals can be misleading. With respect to the CRIS legacy system, while the percentage of requests that received responses in four seconds or less was greater for BellSouth retail than for the CLECs in December 2002, January and February 2003, CLECs received a greater percentage of responses from CRIS in less than ten seconds than was the case for BellSouth retail in each of these three months. Thus, BellSouth believes that, when viewed as a whole, the performance data reflect that CLECs are receiving timely responses from the CRIS legacy system, notwithstanding some slight differences in the timeliness of responses received by CLECs and BellSouth retail.

DLR / <= 4 sec. / Region (D.2.4.3) (December, January & February)

DLR / <= 10 sec. / Region (D.2.5.3) (December, January & February)

DLR / > 10 sec. / Region (D.2.6.3) (December, January & February)

Beginning with July data, the CRIS legacy system replaced the Detailed Line Record (DLR) system for purposes of verifying the CLEC identification code. This change has caused the volume of CLEC queries to the DLR system to decrease dramatically, by approximately 75%. In addition, with the elimination of queries seeking the identification code, the CLEC queries to DLR require more information and take longer periods of time to process, which has caused BellSouth's performance in these sub-metrics to deteriorate. BellSouth is continuing to investigate the differences between retail and CLEC performance in order to develop an appropriate action plan. However, given that such small volumes are involved, any slight difference in the response interval should not impede the CLECs ability to provide service to its end-user customers.

LMOSupd / <= 4 sec. / Region (D.2.4.5) (December, January & February)

LMOSupd / <= 10 sec. / Region (D.2.5.5) (December, January & February)

LMOSupd / > 10 sec. / Region (D.2.6.5.) (December, January & February)

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 December 2002 through February 2003, 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 should not impede a CLEC's ability to secure information in a timely manner.

SECTION 2: ORDERING

O-2: ACKNOWLEDGEMENT MESSAGE COMPLETENESS

EDI (F.12.2.1) (December & January)

TAG (F.12.2.2) (December & January)

BellSouth's performance with respect to these sub-metrics exceeded 99.9% in December 2002 and January 2003, although it fell short of the Commission's 100% benchmark. As BellSouth has previously pointed out, BellSouth has no margin of error with a 100% benchmark, because the failure to deliver a single acknowledgement via EDI or TAG will cause BellSouth to miss this measure. In December 2002, for example, BellSouth failed to deliver acknowledgements on only 2 of the 209,516 messages received via EDI. BellSouth continues to try to resolve the relatively small number of failed acknowledgements in TAG and EDI, and BellSouth met the 100% benchmark for acknowledgement messages returned for both EDI and TAG in February 2003.

O-3: PERCENT FLOW-THROUGH SERVICE REQUESTS (SUMMARY)

Residence / Region (F.1.1.3) (December, January & February)

Business / Region (F.1.1.4) (December, January & February)

LNP / Region (F.1.3.1) (December, January & February)

The business flow-through rate continues to be below the 90% objective, although progress is being made. BellSouth has continued to achieve a business flow through rate above 80% for December 2002, January, and February 2003. However, as BellSouth has explained before, business LSRs are more complex than the typical LSRs and, as a result, there is a greater probability for error. For example, an LSR requesting 10 lines with series completion hunting

that are located over multiple floors and have a variation of features on the lines presents many more opportunities for system mismatches than one that adds just lines and features. This complexity coupled with the relatively low volumes of business LSRs make it very difficult for BellSouth to meet the Commission's 90% benchmark for this sub-metric.

BellSouth's flow-through performance for residence continues to be strong, even though the residence flow-through rate remains below the Commission's benchmark. For example, in December 2003, BellSouth's residence flow-through rate was 93.55% as compared to a benchmark of 95%. Residence Flow-Through fell to 87.61% in January 2003, and 86.95% in February 2003. A defect was introduced in Release 11.0, implemented on December 29, 2002, that caused the volume of a specific error message to increase tenfold. This message had initially been incorrectly classified as a Severity 'M' message, indicating the LSR should fall out for manual handling. Because the volume of these messages had historically been low, the misclassification was not apparent until the defect was introduced. LSRs that generated these messages fell to the Local Carrier Service Center ("LCSC") and were therefore classified as BellSouth caused fallout. This error has been correctly classified as a Severity 'I', an informational message, which will eliminate the fallout. In addition, the defect that caused the volume to increase was corrected in Release 12.0, implemented on March 30, 2003, which should reduce the number of these messages significantly.

Residence flow through is expected to return to near benchmark levels and may exceed the benchmark before mid-year. These performance improvements have been the direct result of the efforts of the BellSouth team dedicated to improving flow through and other flow-through initiatives. For example, BellSouth continues to focus efforts on reducing or eliminating items classified as "BST errors" in the current flow-through reporting process, which are errors that

require manual review by the LCSC due to BellSouth system functionality. BellSouth also continues to investigate possible flow-through improvements by identifying and correcting the top error codes impacting flow through in the Local Exchange Service Order Generator ("LESOG") application. BellSouth implemented Flow-through Improvement Package 4 on March 30, 2003, which should cause flow-through performance to continue to improve.

The drop in LNP flow through can be partially attributed to the implementation of Electronic Facility Check in Florida in December 2002. One of the top error codes associated with LNP was included in LNP Flow-Through Improvement Package 1, which was implemented on April 13, 2003. In addition, several error codes have been identified as planned manual errors and will be added to the LNP Flow-Through code effective with June data. The combination of these actions should return LNP Flow-Through to benchmark levels.

O-8: REJECT INTERVAL

Line Sharing / Electronic (B.1.4.7) (December, January & February)

2-Wire Analog Loop Design / Electronic (B.1.4.8) (December, January & February)

2-Wire Analog Loop Non-Design / Electronic (B.1.4.9) (December, January & February)

Other Design / Electronic (B.1.4.14) (December, January & February)

Other Non-Design / Electronic (B.1.4.15) (December, January & February)

For these sub-metrics for which BellSouth did not meet the benchmark, BellSouth has conducted a detailed root cause analysis of the process for electronic rejects. The root cause analysis has identified three issues that account for a significant portion of the electronic LSRs being rejected back to the CLEC and missing the one-hour benchmark.

First, errors are being detected after the LSR has already received a Firm Order Confirmation ("FOC") for working accounts. When a CLEC sends in an LSR for a new account

and completes the LSR properly, a FOC will be returned. However, if that account is found to be working, then the order cannot be provisioned, and the LSR is manually rejected and returned to the CLEC. If the LSR were submitted as a record only change to the directory listing, this would not be an issue. An enhancement to address this issue was part of ENCORE Release 12.0, which was implemented on March 30, 2003.

Second, errors are being detected for LSRs that are being counted as Fully Mechanized instead of Partially Mechanized, which are LSRs designed to be worked by a service representative. When a CLEC calls regarding a rejected LSR and the service representative retrieves the record outside of their normal process for retrieving orders, the LSR should be counted as Partially Mechanized and the service representative should include the proper identification to reflect the Partially Mechanized status of the LSR. Without this identification, the LSR is counted as Fully Mechanized. BellSouth has determined that service representatives are failing to apply the proper identification in trying to help a CLEC correct their LSR errors. All service representatives have been covered on the correct procedures for handling rejected LSRs from the CLECs. In addition, a PMAP change will be implemented with May data that will properly count these LSRs as Partially Mechanized.

Third, errors are being detected for LSRs with errors that require manual handling. When a CLEC sends in an LSR for a service and completes the LSR properly, a FOC will be returned. However, if an error is encountered that cannot be handled by the system, it must be forwarded to a service representative for disposition. Some of these LSRs are being counted as Fully Mechanized instead of Partially Mechanized, and a PMAP change will be implemented with May data to correct this problem.

Clearly, LSRs that require manual handling because the LSR is rejected after the FOC or that require manual handling by a service representative should not be expected to meet a performance standard of Fully Mechanized rejects. However, these type LSRs are counted as Fully Mechanized because the rejection occurs after a Fully Mechanized FOC has been issued or are incorrectly classified. Because BellSouth is permitted three hours to return a Fully Mechanized FOC or 10 hours for a Partially Mechanized rejection, it is unrealistic to expect a reject that occurs after that FOC or handled by a service representative to be returned in only one hour.

<u>Combo Other / Partial Electronic (B.1.7.4) (January & February)</u>

<u>Line Sharing / Partial Electronic (B.1.7.7) (December & January)</u>

For the UNE Combo Other, BellSouth failed to meet the 85% benchmark in January and February 2003. In January, there were a total of only 25 LSRs rejected in this sub-metric with BellSouth returning 18 (72%) within the 10-hour period. In February, there were a total of 45 LSRs rejected with 31 (69%) returned within the 10-hour benchmark.

For the Line Sharing sub-metric, BellSouth failed to meet the 85% benchmark in December 2002 and January 2003. In December 2002, there were a total of 100 LSRs rejected in this sub-metric with BellSouth returning 83 (83%) within the 10-hour period. In January 2003, there were a total of 189 LSRs rejected with 155 (82%) returned within the 10-hour benchmark. To meet the 85% benchmark, BellSouth needed to return two additional LSRs in December and six additional LSRs in January within the 10-hour period. While BellSouth did not meet the individual sub-metrics for the period, it did meet the 85% objective overall for all LSRs returned to the CLEC during December 2002 through February 2003.

In both sub-metrics, the major reasons for the missed percentage are due to problems encountered after the initial review or in some cases when a rejection is sent after a FOC has already been returned. For example, with the initial response, the customer-provided facility assignment, such as a tie pair to the CLEC collocation point, is not verified. If this CLEC-provided assignment is already working, a rejection is the sent back to the CLEC for further clarification, which in many cases occurs well after the 10-hour benchmark. ENCORE Release 12.0, implemented on March 30, 2003, included a feature that is expected to reduce many of the rejections that occur after the FOC has been issued.

O-9: FIRM ORDER CONFIRMATION TIMELINESS

Combo Other / Electronic (B.1.9.4) (January & February)

For the UNE Combo Other sub-metric, BellSouth failed to meet the 95% benchmark in January and February 2003. In January, there were a total of only 3 LSRs in this sub-metric, none of which received a FOC within the 3-hour period. In February, there were a total of only 11 LSRs with 3 receiving a FOC within the 3-hour benchmark. 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. While BellSouth did not meet the individual sub-metric for the period, it did meet the 95% objective overall for all LSRs returned to the CLEC during December 2002 through February 2003.

Combo Other / Partial Electronic (B.1.12.4) (January & February)

In January 2003, BellSouth met the 10-hour benchmark for 88 of the 117 LSRs confirmed back to the CLECs. In February 2003, BellSouth met the benchmark for 122 of the 197 LSRs confirmed back to the CLECs. BellSouth met the 10-hour benchmark for this sub-

metric in December 2002. The major issue with this sub-metric is due to problems encountered with customer facility assignments. When the information is entered into SOCS and a conflict or working assignment is encountered, it is sent to a service representative to resolve, which often takes more than ten hours to resolve.

O-10: SERVICE INQUIRY WITH LSR FIRM ORDER CONFIRMATION RESPONSE TIME MANUAL

Local Interoffice Transport (F.3.1.2) (December, January & February)

There were a total of only forty inquiries in this sub-metric during the three-month period from December 2002 through February 2003 with 31 being returned within the benchmark. With a 95% benchmark, practically no misses were allowed for this sub-metric in any month. BellSouth continues to focus it efforts to meet the Commission's benchmark for this sub-metric.

O-11: FIRM ORDER CONFIRMATION AND REJECT RESPONSE COMPLETENESS

Combo Other / EDI / Electronic (B.1.14.4.1) (December & January)

xDSL / EDI / Electronic (B.1.14.5.1) (December & January)

xDSL / TAG / Electronic (B.1.14.5.2) (December, January & February)

ISDN Loop / EDI / Electronic (B.1.14.6.1) (January & February)

ISDN Loop / TAG / Electronic (B.1.14.6.2) (January & February)

For these sub-metrics for which BellSouth did not meet the benchmark, BellSouth has conducted a detailed root cause analysis of the process for electronic FOCs and Rejects. The root cause analysis has identified two issues that need to be addressed.

First, the Corporate Gateway System (SGG/COG) is currently not sending FOC data to PMAP in a proper context, which is causing LSRs that receive a FOC not being captured in PMAP. A root cause analysis of this issue revealed that the reason the FOC is not being counted is because the LSRs driving the failures are Cancellation orders from the CLECs, which does not result in the delivery of a FOC. Because under the Service Quality Measurement ("SQM") Plan, LSRs cancelled by CLECs are to be excluded from the measurement, a fix will be implemented later this year to correct this problem.

Second, the Delivery Order Manager (DOM) is not properly identifying the fatal rejects for LSRs submitted with the same or lesser version number to PMAP. Although the LSRs are receiving a response, due to the problem with DOM, they are not being counted in the PMAP system. This issue was addressed with the implementation of ENCORE Release 11.0 on December 27, 2002, although an additional PMAP change is required to account for the ENCORE update, which is tentatively scheduled for implementation with June data.

Other Design / EDI / Electronic (B.1.14.14.1) (December & January)

A defect has been discovered in which certain LSRs are receiving a jeopardy notice when the CLEC is trying to cancel an LSR through a supplemental order. This issue is causing a problem in the counting of responses to the supplemental LSRs. The implementation of the fix to address this problem is scheduled for ENCORE Release 13.0 on June 20, 2003.

Combo Other / EDI / Partial Electronic (B.1.15.4.1) (December, January & February)

There were a total of 443 FOCs returned to the CLECs in this sub-metric during the three-month period from December 2002 through February 2003 with 399 (90%) being returned within the benchmark. The major reason for BellSouth's failure to meet the 95% benchmark is due to the response not being counted when sent in the month after the LSR was received. A

PMAP release is currently scheduled with May 2003 data that is expected to address this problem.

Combo Other / TAG / Partial Electronic (B.1.15.4.2) (December & January)

There were a total of only 11 FOCs returned to the CLECs in this sub-metric during the three-month period from December 2002 through February 2003 with 9 being returned within the benchmark. 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. BellSouth met the 95% benchmark for this sub-metric in February 2003.

Resale PBX / Manual (A.1.16.4) (December, January & February)

Resale Centrex / Manual (A.1.16.5) (December, January & February)

xDSL / Manual (B.1.16.5) (December & February)

INP Standalone / Manual (B.1.16.16) (December, January & February)

The majority of these sub-metrics continue to perform at a level of 90% or better, although many have a relatively small number of transactions. As stated in previous filings, two of the major issues that affect this measure are 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. When an LSR is received at the end of the month and the 24 or 36 hour interval allows the response to be in the next calendar month, it is also counted as a miss. These two items are inherent in the measure and are the major reasons for the failure of these sub-metrics to achieve the 95% benchmark. To address this issue, BellSouth extended the time period when the "snapshot" is taken for capturing report

completeness with October 2002 data, and an additional enhancement to include responses provided in the initial days of the following month after submission will be implemented with May 2003 data.

SECTION 3: PROVISIONING

P-2: PERCENTAGE OF ORDERS GIVEN JEOPARDY NOTICES

Combo Other / Electronic (B.2.5.4) (December, January & February)

UNE ISDN / Electronic (B.2.5.6) (December, January & February)

2W Analog Loop Design / Electronic (B.2.5.8) (December, January & February)

2W Analog Loop Non-Design / Electronic (B.2.5.9) (December, January & February)

2W Analog Loop w/LNP Non-Design / Electronic (B.2.5.13) (December, January & February)

Digital Loop / < DS1 / Electronic (B.2.5.18) (December, January & February)

Digital Loop / >= DS1 / Electronic (B.2.5.19) (December, January & February)

BellSouth uses the "Jeopardy" notice to identify potential facility shortages that could delay installations. BellSouth continues to resolve facility issues promptly, as evidenced by the fact that BellSouth met or exceeded the retail analogue comparison for Missed Installation Appointments for all of these sub-metrics.

P-3: PERCENT MISSED INSTALLATION APPOINTMENTS

Line Sharing / < 10 Circuits / Non-Dispatch (B.2.18.7.1.2) (December & February)

Both BellSouth retail and the CLECs experienced outstanding results in this sub-metric, with the more than 99% of all orders completed as scheduled, although BellSouth missed the applicable retail analogue in December 2002 and February 2003. In December 2002, BellSouth missed only 2 of 549 scheduled appointments (0.36%) for this sub-metric and only 2 of 577 scheduled appointments (0.35%) in February 2003, respectively. When BellSouth provisions high quality service coupled with very large sample sizes, it can cause an apparent missed

condition from a quantitative viewpoint. In these cases, there is very little variation and the sample size is so large that the Z-test becomes overly sensitive to any difference. The statistical test shows that the measurement does not meet the fixed critical value when compared with the retail analogue but BellSouth's actual performance is at a very high level – often 99% or nearly 100% of perfection. From a practical point of view, the CLECs' ability to compete has not been hindered even though the statistical results may show a below standard level of service performance.

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

Local Interoffice Transport / < 10 Circuits / Dispatch (B.2.1.2.1.1) (January & February)

In January and February 2003, there were less than 10 orders completed in each month for this sub-metric. 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..

Combo Other / < 10 Circuits / Dispatch (B.2.1.4.1.1) (December, January & February)

BellSouth's root cause analysis for its failure to meet the retail analogue for this sub-metric did not reveal any performance issues, but rather uncovered a problem with the retail analogue against which BellSouth's performance is being judged. Currently, a significant number of the products in this sub-metric are "Enhanced Extended Loops" ("EELs"), which involve the provisioning of DS1s or DS3 and which have a standard interval of at least 10 days. By contrast, the retail analogue for this sub-metric is Residence/Business/Design Dispatch, which has a considerably shorter provisioning interval. BellSouth believes that once a separate

sub-metric is established for EELs, as the Commission has ordered in Docket 7892-U, BellSouth's performance in this sub-metric should improve.

Line Sharing / <6 circuits / Non Dispatch (B.2.1.7.3.2) (December, January & February)

BellSouth missed the retail analogue for the sub-metric with CLEC activity not requiring a dispatch during December 2002 through February 2003. During the period, the CLEC results averaged 2.66 days compared with a retail analogue of 2.41 days. As stated earlier, BellSouth only missed a total of 8 scheduled appointments for this sub-metric during the 3-month period. This small difference in intervals should not impede competition as over 99.5% of all CLEC orders were completed as scheduled.

2W Analog Loop w/LNP / Non-Design / Dispatch In (B.2.1.13.1.4) (December, January & February)

Wholesale intervals for "dispatch" and "non-dispatch" orders are scheduled the same, as the work function cannot be determined until the service order is written. As a result, CLEC orders are scheduled based on the standard ordering guide, which requires a minimum four-day interval for these orders. By contrast, the retail analogue is residence and business (POTS) type orders, some of which may be scheduled and completed in less than one day. This difference in product types and provisioning requirements tends to skew BellSouth's performance.

Digital Loop / < DS1 / < 10 Circuits / Dispatch (B.2.1.18.1.1) (December, January & February)

BellSouth's root cause analysis has determined that the primary reason for the failure to achieve the applicable retail analogue comparison for this sub-metric was due to the mix of orders involved. A large portion of the CLEC orders in this sub-metric were for Unbundled Digital Channel (UDC) circuits, which are designed circuits that require approximately 10 days to complete. This is compared to the standard intervals for the products in the retail analogue,

which typically are three to five days (e.g., DS0). Even though BellSouth is generally meeting its installation commitment dates for this measurement, the intervals are inherently longer than for the retail analogue, which skews BellSouth's performance.

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

Residence / < 10 Circuits / Non-Dispatch (A.2.12.1.1.2) (December, January & February)

Centrex / >= 10 Circuits / Non-Dispatch (A.2.12.5.2.2) (January & February)

For the Residence sub-metric, many of the CLEC troubles that are completed without technician involvement are due to problems with local drops or premise network terminating wire. BellSouth is currently conducting a trial in four wire centers in Georgia that pretests the lines on certain non-dispatched orders. This trial is expected to be completed at the end of May 2003, after which a decision will be made whether to implement this procedure for resale and UNE non-dispatched orders. Also, there were only a total of eleven Centrex >= 10 non-dispatch orders completed during the December 2002 through February 2003, which does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

Line Sharing / < 10 Circuits / Dispatch (B.2.19.7.1.1) (January & February)

During the three-month period from January and February 2003, over 50% of all troubles reported in these sub-metrics were closed as "Test Okay/Found Okay" (TOK/FOK"). BellSouth's root cause analysis has not identified any systematic failures associated with these sub-metrics, although BellSouth continues to work to reduce the troubles associated with its line sharing installations.

Digital Loop >= DS1 / < 10 Circuits / Dispatch (B.2.19.19.1.1) (December & January)

During the three-month period from December 2002 through February 2003, in excess of 25% of all troubles reported in this sub-metric were closed as "TOK/FOK." BellSouth's root cause analysis has not identified any systematic failures associated with this sub-metric, although BellSouth continues to work to reduce the troubles associated with its digital loop installations.

P-11: SERVICE ORDER ACCURACY

Resale Business / >= 10 Circuits / Dispatch (A.2.25.2.2.1) (December & February)

Resale Business / >= 10 Circuits / Non Dispatch (A.2.25.2.2.2) (December, January & February)

Resale Design (Specials) / <10 Circuits / Dispatch (A.2.25.3.1.1) (December & January)

Resale Design (Specials) / <10 Circuits / Non Dispatch (A.2.25.3.1.2) (December & January)

Resale Design (Specials) / >=10 Circuits / Dispatch (A.2.25.3.2.1) (December, January & February)

Resale Design (Specials) / >=10 Circuits / Non Dispatch (A.2.25.3.2.2) (December, January & February

BellSouth continues to work with its service representatives to improve the accuracy of their service orders. Of the six sub-metrics that did not meet the 95% benchmark for two of the three months during the period from December 2002 through February 2003, 4 of the 6 sub-metrics were not allowed any missed orders within the 95% benchmark due to a small sample size. For Resale Business / >= 10 circuits / Dispatch sub-metric (A.2.25.2.2.1), there were a total of 14 orders sampled with 12 of them meeting the accuracy threshold, although the 95% benchmark required 100% of this sample to be accurate. In many cases with sample sizes of less than 20 service orders, there is very little room for error.

Nevertheless, the overall trend in service order accuracy continues to be strong for the majority of the sub-metrics. While BellSouth is not meeting all of the sub-metrics each month, it continues to meet the 95% objective for the total LSRs reviewed. During the 3-month period of December 2002 through February 2003, BellSouth met 4,604 of the 4,723 orders reviewed or 97.5%. While all sub-metrics did not meet the 95% benchmark, the vast majority of the orders were issued error-free.

SECTION 4: MAINTENANCE AND REPAIR

M&R-1: MISSED REPAIR APPOINTMENTS

Line Sharing / Non-Dispatch (B.3.1.7.2) (December, January & February)

BellSouth failed to meet five, twelve and six scheduled appointments, respectively, in this sub-metric from December 2002 through February 2003. There were no systemic issues identified for any of these missed appointments.

M&R-2: CUSTOMER TROUBLE REPORT RATE

Residence / Dispatch (A.3.2.1.1) (December, January & February)

Design (Specials) / Dispatch (A.3.2.3.1) (December, January & February)

Design (Specials) / Non-Dispatch (A.3.2.3.2) (December, January & February)

PBX / Dispatch (A.3.2.4.1) (December, January & February)

Centrex / Dispatch (A.3.2.5.1) (January & February)

Centrex / Non Dispatch (A.3.2.5.2) (December, January & February)

ISDN / Dispatch (A.3.2.6.1) (December, January & February)

Even though BellSouth exceeded the retail analogue comparison for one of the three months in several of these sub-metrics, the results for the entire three-month period from December 2002 through February 2003 reflect that trouble free service was being provided on 97% to 99% of the lines in service for each of these sub-metrics for each month.

Combo Other / Dispatch (B.3.2.4.1) (December, January & February)

Combo Other / Non Dispatch (B.3.2.4.2) (December, January & February)

Over 97% of all in-service lines were trouble free during the period of December 2002 through February 2003. The vast majority of customers -- both wholesale and retail -- received

trouble free service during the period from December 2002 through February 2003. There were no systemic issues identified for any of the troubles reported during the period.

Other Design / Dispatch (B.3.2.10.1) (December, January & February)

Other Design / Non-Dispatch (B.3.2.10.2) (December, January & February)

Beginning with September data, the digital loop results were added to these sub-metrics. While BellSouth did not meet the retail analogue comparison in any of the three months, over 97% of the in service lines were trouble-free. BellSouth continues to work to with the CLECs to reduce the number of troubles in these sub-metrics.

M&R-3: MAINTENANCE AVERAGE DURATION

PBX / Non-Dispatch (A.3.3.4.2) (December & February)

There were only 17 troubles reported in the two months that did not meet the retail analogue comparison. 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.

Line Sharing / Non-Dispatch (B.3.3.7.2) (December, January & February)

During the period of December 2002 through February 2003, over 70% of all reported troubles in this sub-metric were closed as no trouble found. The time involved in trying to determine the source of trouble continues to be an issue. One CLEC generates the vast majority of line sharing activity, and BellSouth continues to work with them to resolve this issue.

M&R-4: PERCENT REPEAT TROUBLES WITHIN 30 DAYS

Resale PBX / Dispatch (A.3.4.4.1) (December & February)

There were only a total of 12 repeat troubles reported during the period from December 2002 through February 2003. 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.

Combo Other / Dispatch (B.3.4.4.1) (January & February)

BellSouth has found no systemic issues related to this sub-metric. As stated previously, line sharing is provided primarily by one CLEC, and BellSouth's experience has been that the vast majority of troubles reported by this CLEC are closed with no trouble found.

M&R-5: PERCENT OUT OF SERVICE > 24 HOURS

Resale PBX / Non-Dispatch (A.3.5.4.2) (December & February)

There were only 4 CLEC troubles that were out of service longer than 24 hours during the period from December 2002 through February 2003. Also, only a total of 21 CLEC troubles were reported over the entire three-month period for this sub-metric. 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. However, there were no systemic issues identified for either of the troubles reported for this sub-metric.

SECTION 11: CHANGE MANAGEMENT

CM-5: INTERFACE OUTAGES SENT WITHIN 15 MINUTES

Region (F.10.6) (December & January)

BellSouth met 16 of 17 notifications within 15 minutes in December and 30 of 31 in January. However, the 97% benchmark required that 100% of all notices have met the 15-minute benchmark. BellSouth met all 12 of the notifications in February 2003.   There were no systemic issues identified for either of the missed notifications in December or January.

Respectfully submitted, this 30th day of April, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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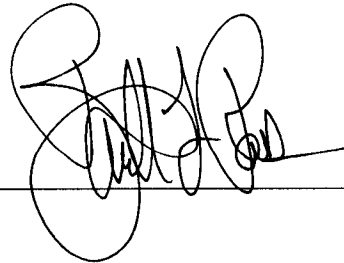NEXTEL Communications, Access Integrated]

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