BellSouth Telecommunications, Inc.
Legal Department
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, GA 30319-5309

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel - Georgia

404 986 1718
Fax 404 986 1800

July 31, 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 Ninth 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 (PME)

BLR:nvd
Enclosures

cc: Parties of Record

499853/499723

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

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

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 ninth 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 (March, April and May 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) (March, April & May)

COFFI / Region / ROS (D.1.3.6.2) (March, April & May)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system COFFI by both BellSouth retail and Competing Local Exchange Carriers

("CLECs"). BellSouth has continued to review the interface for this system and has not identified any systematic issues affecting performance. Currently, the difference in the response intervals for CLECs and for BellSouth retail using RNS and ROS is approximately 1.0 and 0.5 seconds, respectively. Such a minor difference should not impede a CLEC's ability to secure information in a timely manner.

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

ATLAS / Region / ROS (D.1.4.5.2) (April & May)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system ATLAS by both BellSouth retail and the CLECs. The difference in the response intervals for CLECs and for BellSouth retail using ROS was approximately 0.12 seconds for the two months (April & May) that did not meet the retail analogue comparison. A detailed review of this system has not indicated any systemic issues affecting performance, and, in fact, during the three-month period, the CLECs received a faster average response interval, 2.25 seconds compared with 2.42 seconds, than BellSouth retail.

OSS-4: RESPONSE INTERVAL (MAINTENANCE & REPAIR)

DLR / <= 4 sec. / Region (D.2.4.3) (March & May)

DLR / <= 10 sec. / Region (D.2.5.3) (March, April & May)

DLR / > 10 sec. / Region (D.2.6.3) (March, April & May)

The CRIS legacy system has replaced the Detailed Line Record (DLR) system for purposes of verifying the CLEC identification code, which 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 has continued to review the interface for this system and has not identified any systematic issues affecting performance. However, given that such small volumes are involved, any slight difference in the response interval should not impede a CLECs ability to secure information in a timely manner.

LMOSupd / <= 4 sec. / Region (D.2.4.5) (March, April & May)

LMOSupd / <= 10 sec. / Region (D.2.5.5) (March, April & May)

LMOSupd / > 10 sec. / Region (D.2.6.5.) (March, April & May)

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 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.

LNP / <= 4 sec. / Region (D.2.4.6) (March & April)

OSPCM / <= 4 sec. / Region (D.2.4.8) (March, April & May)

These measures capture 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 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 LNP 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 March and April 2003, CLECs received a greater percentage of responses from LNP in less than ten seconds than was the case for BellSouth retail in each of these three months. Also, the CLECs and BellSouth retail received over 99.5% of all responses for this system in less than 4 seconds during the period. Thus, when viewed as a whole, the performance data reflect that CLECs are receiving timely responses from the LNP legacy system, notwithstanding some slight differences in the timeliness of responses received by CLECs and BellSouth retail.

Similarly, with respect to the OSPCM 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 March, April and May 2003, CLECs received a greater percentage of responses from OSPCM in less than ten seconds than was the case for BellSouth retail in each of these three months. Also, the CLECs and BellSouth retail received over 99.5% of all responses for this system in less than 10 seconds during the period. Thus, when viewed as a whole, the performance data reflect that CLECs are receiving timely responses from the OSPCM legacy system, notwithstanding some slight differences in the timeliness of responses received by CLECs and BellSouth retail.

SECTION 2: ORDERING

O-2: ACKNOWLEDGEMENT MESSAGE COMPLETENESS

EDI (F.12.2.1) (March, April & May)

TAG (F.12.2.2) (March & April)

BellSouth's performance with respect to these sub-metrics exceeded 99% in March through May 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 March 2003, for example, BellSouth failed to deliver acknowledgements on only 8 of the 299,113 messages received via TAG. 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 TAG in May 2003.

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

Business / Region (F.1.1.4) (March, April & May)

LNP / Region (F.1.3.1) (March, April & May)

The business flow-through rate continues to be below the 90% objective, although progress is being made. BellSouth has continued to improve the business flow-through rate in each of the three months included with this plan. In March the business flow-through rate was 80.64%, improving to 84.96% in April and 87.43% in May 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, although progress continues to be made.

With respect to LNP flow through, BellSouth recently discovered that some LNP Local Service Requests ("LSRs") that should be counted as planned manual fallout were being counted as fallout because the error codes were not identified as planned manual errors. As reflected in the June 2003 Data Notification (Item No. 4) filed with the Commission on May 1, 2003, BellSouth will modify the LNP flow-through code to include these planned manual error codes with June 2003 data, which should return LNP flow-through rates to benchmark levels.

O-8: REJECT INTERVAL

xDSL / Electronic (B.1.4.5) (March & April)

Line Sharing / Electronic (B.1.4.7) (March, April & May)

2-Wire Analog Loop Design / Electronic (B.1.4.8) (March & April)

2-Wire Analog Loop Non-Design / Electronic (B.1.4.9) (March & April)

Other Design / Electronic (B.1.4.14) (March & April)

Other Non-Design / Electronic (B.1.4.15) (March & April)

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 identified in previous Corrective Action Plans that account for a significant portion of the electronic LSRs being rejected back to the CLEC and missing the one-hour benchmark. Corrections have been implemented to address each of these issues, which should cause performance results to improve.

First, on March 30, 2003, an enhancement was included as part of Encore Release 12.0 to address errors being detected after the LSR has already received a FOC for working accounts. Second, to address errors erroneously being counted as Fully Mechanized instead of Partially Mechanized, all service representatives have been covered on the correct procedures for handling rejected LSRs from the CLECs. Third, a PMAP change was implemented with May data that will properly count LSRs as Partially Mechanized, as described more fully in the May 2003 Data Notification filed on April 1, 2003 (Item No. 7.)

These changes have resulted in this measure being brought into parity. In reviewing May data, for example, BellSouth returned 13,897 of 14,099 (98.57%) rejects within the 1-hour benchmark. The only sub-metrics that were missed consisted of relatively low volume levels. For example, as indicated above, all but one of these sub-metrics (Line Sharing) met the 97% in 1-hour benchmark in May. For that sub-metric (B.1.4.7) BellSouth met 11 of the 13 rejects within the 1-hour benchmark. Of the 13 rejects, 8 were returned within 12 minutes or less, an additional 3 within 1 hour and the remaining 2 were returned in less than 4 hours. The average reject interval for the 13 clarified LSRs in May for Line Sharing was 22.7 minutes.

xDSL / Partial Electronic (B.1.7.5) (March, April & May)

BellSouth has identified a conflict in the ending timestamp in the Work Item Manager (WIM) that is used for DSL orders and PMAP. BellSouth continues to investigate this issue and will provide a corrective action plan when it is developed.

ISDN Loops / Partial Electronic (B.1.7.6) (March, April & May)

Line Sharing / Partial Electronic (B.1.7.7) (March, April & May)

2-Wire Analog Loop Design / Partial Electronic (B.1.7.8) (March, April & May)

2-Wire Analog Loop Non Design / Partial Electronic (B.1.7.9) (March, April & May)

2-Wire Analog Loop w/LNP Design / Partial Electronic (B.1.7.12) (March & May)

Other Design / Partial Electronic (B.1.7.14) (March, April & May)

Other Non Design / Partial Electronic (B.1.7.15) (April & May)

LNP Standalone / Partial Electronic (B.1.7.17) (April & May)

A detailed analysis of the raw data for these sub-metrics has detected time gaps in system processing between the receiving systems from the CLEC and the gateway that is used by the service representative to retrieve the LSR for manual processing. BellSouth continues to investigate this issue and will provide a corrective action plan when it is developed.

Resale Design (Specials) / Manual (A.1.8.3) / (March & April)

Resale ISDN / Manual (A.1.8.6) / (April & May)

Combo Other / Manual (B.1.8.4) / (March & May)

BellSouth has identified a problem with the ending timestamp being provided from LON to PMAP. Due to a problem with the "toolkit" program, a second clarification was being sent incorrectly, and the ending timestamp was being sent to PMAP for the second clarification instead of the initial timestamp that would have met the 24-hour benchmark. This issue was corrected in LON, and an internal change within the Local Service Carrier Center ("LCSC") was made on May 16, 2003, which should result in improved performance results.

O-9: FIRM ORDER CONFIRMATION TIMELINESS

Combo Other / Electronic (B.1.9.4) (March, April & May)

EELs / Electronic (B.1.9.18) (March, April & May)

BellSouth failed to meet the 95% benchmark for these sub-metrics from March through May 2003. However, there were only 10 LSRs submitted in March and May with 11 submitted in April 2003. Such a small universe of transactions does not make it possible to perform a

meaningful root cause analysis from which any conclusions can reasonably be drawn. While BellSouth did not meet the individual sub-metrics for the period, it did meet the 95% objective overall for all fully mechanized LSRs returned to the CLEC from March through May 2003.

Combo Other / Partial Electronic (B.1.12.4) (March, April & May)

xDSL / Partial Electronic (B.1.12.5) (April & May)

Line Sharing / Partial Electronic (B.1.12.7) (March, April & May)

2-Wire Analog Loop Design / Partial Electronic (B.1.12.8) (March, April & May)

2-Wire Analog Loop Non Design / Partial Electronic (B.1.12.9) (March, April & May)

2-Wire Analog Loop w/LNP Design / Partial Electronic (B.1.12.12) (March, April & May)

Other Design / Partial Electronic (B.1.12.14) (March, April & May)

Other Non Design / Partial Electronic (B.1.12.15) (March, April & May)

LNP Standalone / Partial Electronic (B.1.12.17) (March, April & May)

EELs / Partial Electronic (B.1.12.18) (March, April & May)

BellSouth has determined that the initial timestamp for the receiving gateway (EDI, LENS, or TAG) is different than the initial timestamp being received by the processing gateways of WIM, LEO or LNP. BellSouth continues to investigate this issue further and will provide a corrective action plan when it is developed.

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

Local Interoffice Transport (F.3.1.2) (March & April)

There were a total of only thirty-six inquiries in this sub-metric during the three-month period from March 2003 through May 2003 with twenty-three 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. BellSouth returned all six of the service inquiries (100%) within the four-day benchmark in May 2003 for this sub-metric.

O-11: FIRM ORDER CONFIRMATION AND REJECT RESPONSE COMPLETENESS

Combo Other / EDI / Electronic (B.1.14.4.1) (March & April)

xDSL / EDI / Electronic (B.1.14.5.1) (March, April & May)

xDSL / TAG / Electronic (B.1.14.5.2) (March, April & May)

ISDN Loop / EDI / Electronic (B.1.14.6.1) (March, April & May)

LNP Standalone / TAG / Electronic (B.1.14.17.2) (March & May)

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 FOC is not being counted 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 SQM, LSRs cancelled by CLECs are to be excluded from the measurement, a fix is tentatively scheduled for September data to correct this problem, as described more fully in the Proposed September Data Notification (Item No. 6.)

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 and a PMAP change effective with May 2003 data, as described more fully in the May 2003 Data Notification filed on April 1, 2003 (Item No. 4.)

Combo Other / EDI / Partial Electronic (B.1.15.4.1) (March, April & May)

There were a total of 800 FOCs and Rejects returned to the CLECs in this sub-metric during the three-month period from March through May 2003 with 732 (92%) being returned within the benchmark. The major reason for BellSouth's failure to meet the 97% benchmark is due to the multiple LSRs being sent within a short time period and BellSouth only responding to the final version. When the CLECs send in updated versions of an LSR in literally minutes of each other, and they require manual handling by a service representative, the representative responds to only the final version of the LSR. Therefore, all other versions have no response and thus are not counted in the numerator for this measure. Also, 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 and a PMAP change effective with May 2003 data, as described more fully in the May 2003 Data Notification filed on April 1, 2003 (Item No. 4.)

Combo Other / TAG / Partial Electronic (B.1.15.4.2) (March, April & May)

There were a total of only 18 FOCs returned to the CLECs in this sub-metric during the three-month period from March through May 2003 with 13 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 reasonably be drawn.

xDSL / TAG / Partial Electronic (B.1.15.5.2) (March, April & May)

ISDN Loop / TAG / Partial Electronic (B.1.15.6.2) (March & April)

Resale Design (Specials) / Manual (A.1.16.3) (March & May)

2-Wire Analog Loop Design / Manual (B.1.16.8) (April & May)

2-Wire Analog Loop Non Design / Manual (B.1.16.9) (March & May)

2-Wire Analog Loop w/LNP Non Design / Manual (B.1.16.13) (April & May)

INP Standalone / Manual (B.1.16.16) (March, April & May)

The majority of these sub-metrics continue to perform at a level of 90% or better, with many having 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. As described above, BellSouth has made certain changes to address these issues, which should result in improved performance in these sub-metrics.

SECTION 3: PROVISIONING

P-2B: PERCENTAGE OF ORDERS GIVEN JEOPARDY NOTICES

Resale Residence / Electronic (A.2.4.1) (March & April)

Combo Other / Electronic (B.2.5.4) (March, April & May)

UNE ISDN / Electronic (B.2.5.6) (March, April & May)

2W Analog Loop Non-Design / Electronic (B.2.5.9) (March, April & May)

Digital Loop / < DS1 / Electronic (B.2.5.18) (March, April & May)

Digital Loop / >= DS1 / Electronic (B.2.5.19) (March, April & May)

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

Combo Other / < 10 Circuits / Dispatch (B.2.1.4.1.1) (March, April & May)

EELs / < 10 Circuits / Dispatch (B.2.36.1.1) (March, April & May)

EELs / < 10 Circuits / Dispatch (B.2.37.1.1) (March, April & May)

BellSouth's root cause analysis has determined two issues that adversely impact BellSouth's ability to meet the Commission's benchmarks for EEL provisioning of 30% within 5 days and 70% with 8 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, the performance data

for March through May 2003 indicates that CLECs in Georgia have not ordered any voice grade EELs, and the vast majority of the CLEC orders for EELs are at DS1 levels, which take longer to provision. 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. BellSouth continues to investigate the steps necessary to address this situation.

2W Analog Loop Non-Design / < 10 Circuits / Dispatch In (B.2.1.9.1.4) (March & April)

There was only one order in March and two orders in April 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 reasonably be drawn.

2W Analog Loop w/LNP Non-Design / < 10 Circuits / Dispatch In (B.2.1.13.1.4) (March, April& 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.

Digital Loop / < DS1 / < 10 Circuits / Dispatch (B.2.1.18.1.1) (March & April)

BellSouth discovered that certain retail orders in this sub-metric were being coded incorrectly as dispatch when they should have been coded as non-dispatched, which artificially reduced retail performance for the dispatched sub-metric. Beginning in May, the PMAP algorithm that classifies orders for dispatch and non-dispatch was modified to more correctly reflect the work function performed, as described more fully in the May Data Notification filed

with this Commission on the April 1, 2003 (Item No. 20.) BellSouth met the retail analogue comparison for this sub-metric in May 2003.

UNE UCL – Non Design / < 10 Circuits / Dispatch (B.2.2.3) (April & May)

There were ten or less CLEC orders from March through May 2003 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 reasonably be drawn.

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

Combo Other / < 10 Circuits / Dispatch (B.2.35.4.1.1.1) (March, April & May)

2W Analog Loop w/LNP Non-Design / < 10 Circuits / Dispatch In (B.2.35.13.1.1.4) (March, April & May)

Digital Loop / < DS1 / < 10 Circuits / Dispatch (B.2.35.18.1.1.1) (March & April)

EELs / < 10 Circuits / Dispatch (B.2.38.1.1) (March, April & May)

EELs / < 10 Circuits / Dispatch (B.2.39.1.1) (March, April & May)

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

P-5: AVERAGE COMPLETION NOTICE INTERVAL

2W Analog Loop w/LNP / Non-Design / Dispatch (B.2.21.13.1.1) (March & May)

2W Analog Loop w/LNP / Non-Design / Dispatch In (B.2.21.13.1.4) (March, April & May)

LNP (Standalone) / Non-Dispatch (B.2.21.17.1.2) (March, April & May)

With the implementation of the new SQM effective with March 2003 data, BellSouth incorrectly changed the ending timestamp for the ACNI measure. BellSouth continues to investigate this issue further and will provide a corrective action plan when it is developed.

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

Residence / < 10 Circuits / Non-Dispatch (A.2.12.1.1.2) (March & April)

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 conducted a trial in four wire centers in Georgia that pretests the lines on certain non-dispatched orders. This test determines if the facility is adequate to support the proposed circuit order. The trial completed at the end of May 2003, and BellSouth continues to evaluate the results of this trial.

Combo Other / < 10 Circuits / Dispatch (B.2.19.4.1.1) (April & May)

During the period of April and May 2003, over 25% of all troubles reported in this sub-metric 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 EEL installations.

P-13: % LNP DISCONNECT TIMELINESS

P-13B: % of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date (B.2.41) (March, April & May)

This submetric measures the percentage of time BellSouth applies the 10-digit trigger order prior to the LNP order due date. BellSouth did not meet the 96.5% benchmark during

March through May 2003. Each month BellSouth verifies that all orders that should have been coded as trigger orders have been correctly included in this measure. A detailed analysis of this verification process has indicated that some of these trigger orders should have been excluded and have understated BellSouth's results for this measure. BellSouth is currently working with Accenture to correct the coding for this process and will provide notification, if needed, when the updated process has been finalized.

P-13C: % Out of Service < 60 Minutes (B.2.42) (March, April & May)

This submetric measures the number of LNP related conversions where the time required to facilitate the activation of the port in BellSouth's network is 60 minutes. A detailed analysis has determined that the ORACLE software in PMAP is adding time to orders that are exactly 60 minutes in length. The PMAP software is adding less than one second to the 60 minutes, causing the system to count it as a benchmark miss. BellSouth is currently analyzing the coding for this calculation and will provide proper notification when this analysis is complete.

P-13D: % Disconnect Timeliness Interval for Non Trigger Orders (B.2.43) (March, April & May)

This submetric measures the disconnect timeliness interval between receiving the valid "Number Ported" message from NPAC and the actual time the number was disconnected in the central office switching system. BellSouth has determined that the source data used by PMAP is not providing the correct disconnect timestamp for this measure. BellSouth is currently working to determine the correct timestamp information and will provide proper notification when this work is complete.

SECTION 4: MAINTENANCE AND REPAIR

M&R-1: MISSED REPAIR APPOINTMENTS

PBX / Dispatch (A.3.1.4.1) (April & May)

There were a total of 21 CLEC orders from March through May 2003 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 reasonably be drawn.

Line Sharing / Non-Dispatch (B.3.1.7.2) (March & April)

BellSouth failed to meet four of 59 scheduled appointments in March and three of the 59 scheduled appointments in April in this sub-metric. There were no systemic issues identified for any of the seven missed appointments in this sub-metric. BellSouth did not miss any of the 50 scheduled appointments for this sub-metric in May 2003.

2W Analog Loop Non-Design / Non-Dispatch (B.3.1.9.2) (April & May)

BellSouth failed to meet one of five scheduled appointments in April and one of the four scheduled appointments in April in this sub-metric. There were no systemic issues identified for any of the two missed appointments in this sub-metric. BellSouth did not miss any of the eight scheduled appointments in March 2003. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can reasonably be drawn.

M&R-2: CUSTOMER TROUBLE REPORT RATE

Residence / Dispatch (A.3.2.1.1) (March & April)

Design (Specials) / Dispatch (A.3.2.3.1) (March, April & May)

Design (Specials) / Non-Dispatch (A.3.2.3.2) (March, April & May)

Centrex / Non Dispatch (A.3.2.5.2) (March, April & May)

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 March through May 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. There were no systemic issues identified for any of the troubles reported in these sub-metrics.

Combo Other / Dispatch (B.3.2.4.1) (March, April & May)

Over 96% of all in-service lines were trouble free during the period of March through May 2003. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period from March through May 2003. There were no systemic issues identified 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 3.8 million compared with 7 thousand 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.

xDSL / Dispatch (B.3.2.5.1) (April & May)

Over 95% of all in-service lines were trouble free during the period of March through May 2003. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. There were no systemic issues identified for any of the troubles reported during the period.

Other Design / Dispatch (B.3.2.10.1) (March, April & May)

Other Design / Non-Dispatch (B.3.2.10.2) (March, April & May)

Over 97% of all in-service lines were trouble free during the period of March through May 2003. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. There were no systemic issues identified for any of the troubles reported during the period.

M&R-3: MAINTENANCE AVERAGE DURATION

Line Sharing / Non-Dispatch (B.3.3.7.2) (March, April & May)

BellSouth continues to review the few troubles that are actually closed with a central office trouble code. With approximately 50 reports a month in most cases and the majority of the troubles closed as no trouble found, there have been no systemic issues identified for the actual troubles closed to the central office codes. Any extended duration ticket with the size of the universe will have a major affect on the average duration. BellSouth continues to review the reports on a daily basis to reduce the interval for this sub-metric.

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

Combo Other / Dispatch (B.3.4.4.1) (March & May)

Combo Other / Non-Dispatch (B.3.4.4.2) (March & May)

BellSouth has found no systemic issues related to this sub-metric. The major difference is the small volume of troubles reported by the CLECs compared with the retail analogue. During the three-month period the CLECs only reported an average of 200 reports with a repeat rate of 22%, while the retail analogue reported an average of 68,000 with a repeat rate of 18%.

SECTION 5: BILLING

B-1: INVOICE ACCURACY

Invoice Accuracy / Local Interconnection Trunks (C.4.1) (March & April)

BellSouth did not meet the retail analogue comparison for this submetric in both March and April 2003, although both retail and wholesale received invoice accuracy of approximately 97%. In both months, BellSouth's root cause analysis revealed billing errors that affected only CLECs, and BellSouth has retrained its representatives to address such issues. BellSouth met this submetric in May 2003.

SECTION 11: CHANGE MANAGEMENT

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

This measure captures the percentage of Software Errors corrected within x Business Days for Type 6 change requests. Type 6 requests are classified as defects in the Change Control Process ("CCP") and further subdivided as Severity 2, 3 and 4 type errors. Severity 2 requests are defined as errors that could cause a potential problem with the CLEC interface, do not have a workaround, and are to be corrected within 10 business days. Severity 3 requests are the same as Severity 2 but have workarounds in place and must be completed within 30 business days. Severity 4 errors are less significant as do not require the CLECs to take any special steps to process their orders and must be corrected within 45 business days.

BellSouth's root cause analysis indicates that not all issues classified as "defects" for purposes of this measure are actually defects in the software. Under the CCP, Type 6 change requests include errors that are made when designing and subsequently coding the software as well as differences in interpretation between BellSouth and CLECs or oversights in documenting the functionality that should be created. The current definition for a Type 6 change request does not distinguish between a coding error versus an oversight in documenting the functionality to be designed, even though the latter is not truly a "software defect." In the case of an oversight or interpretation difference, the software is in fact functioning as designed. Based on the current CCP defect definitions, a defect is created when the system does not perform as expected, regardless of whether the behavior was introduced because of a coding error or not. When change requests are validated, the request is documented in business rules that are developed to describe the change, user requirements that reflect how the systems should be changed to implement the revised business rules, and systems requirements that reflect the actual software

changes that will be made to satisfy the request. This series of documentation is used to test and validate software changes. If the system is determined to not be working according to the written requirements, it is considered a defect. In this case, the developer has a "road map" (*i.e.*, these documented requirements) that explains how the software is supposed to behave and what should be done to correct the defect. The defect is then assigned a severity level that reflects the impact to the functionality and that determines how soon the defect should be corrected.

By contrast, when a Type 6 change request actually reflects an oversight in developing requirements or business rules or an interpretive difference, the developers do not have a "road map" that indicates how the software should behave or what changes should be made to correct the problem. In this case, the functionality was developed, tested and implemented as intended by all the documentation (i.e., business rules, user/system requirements). To implement this version of a Type 6 change request involves adding new functionality, which requires developing new business rules, user requirements, and system requirements, all of which must be defined and validated before software changes can be made. Even though this new feature does not prevent a CLEC from using the software as designed, it is counted as a defect under this measure. Importantly, the additional work required to implement a new feature almost always requires the work to be done in a software release which requires longer than the time frames permitted by this measure to schedule and produce.

The other problem is that, by the time this measure was implemented, the majority of the available resources for software updates had been committed, which left few resources for the correction of software defects. The majority of the pending requests were completed with the March 30, 2003 software release, and BellSouth is working to resolve pending and future software defects within the time periods prescribed by the Commission.

Respectfully submitted, this 31st day of July, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Bennett L Ross (PME)

BENNETT L. ROSS
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, Georgia 30319-5309
(404) 986-1718

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

CERTIFICATE OF SERVICE
Docket No. 7892-U

This is to certify that I have this day served a copy of the foregoing, upon all known parties of record, by depositing same in U.S. Mail with adequate postage, addressed as follows:

Ms. Kristy R. Holley
Division Director
Consumers' Utility Counsel Division
47 Trinity Avenue, S.W.
4th Floor
Atlanta, GA 30334

Daniel S. Walsh, Esquire
Assistant Attorney General
Department of Law – State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1300

Jonathan E. Canis, Esquire
Michael B. Hazzard, Esquire
Andrew M. Klein, Esquire
Enrico C. Soriano, Esquire
Kelley, Drye & Warren, LLP
1200 19th Street, N.W., Suite 500
Washington, DC 20036
[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
[Counsel for Rhythms Links, Inc., Covad, XO Georgia, Time Warner, MediaOne, TRA, LCI, Teleport Communications]

David I. Adelman, Esquire
Charles B. Jones III, Esquire
C. Christopher Hagy, Esquire
Hayley B. Riddle, Esquire
Sutherland, Asbill & Brennan LLP
999 Peachtree Street, NE
Atlanta, GA 30309-3996
[Counsel for ITC^DeltaCom, WorldCom, Inc.]

Frank B. Strickland, Esquire
Anne W. Lewis, Esquire
Strickland Brockington & Lewis
Midtown Proscenium – Suite 2000
1170 Peachtree Street, N.E.
Atlanta, GA 30309
[Counsel for e.spire Communications]

Suzanne W. Ockleberry, Esquire
AT&T Communications of the
Southern States, Inc.
1200 Peachtree Street, N.E., Room 8100
Atlanta, GA 30309

Mark M. Middleton, Esquire
Mark M. Middleton, P.C.
350 Parkway Lane
Norcross, GA 30092
[Counsel for CTAG]

William R. Atkinson, Esquire
Sprint Communications Co.
3065 Cumberland Boulevard
Mailstop GAATLD0602
Atlanta, GA 30339

Charles V. Gerkin, Jr., Esquire
Attorney at Law
3939-E LaVista Road
Suite 313
Tucker, GA 30084
[Counsel for NewSouth, ICG Telecom]

VIA INTEROFFICE MAIL
Harris R. Anthony, Esquire
BellSouth Long Distance, Inc.
400 Perimeter Center Terrace
Suite 350 – North Terraces
Atlanta, GA 30346

Newton M. Galloway, Esquire
Dean R. Fuchs, Esquire
Smith, Galloway, Lyndall & Fuchs, LLP
400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229
[Counsel for US LEC, Birch Telecom, SECCA]

Walt Sapronov, Esquire
Gerry & Sapronov LLP
Three Ravinia Drive
Suite 1455
Atlanta, GA 30346-2117
[Counsel for Multitechnology, Powertel, NEXTEL Communications, Access Integrated]

Anne E. Franklin, Esquire
Arnall, Golden & Gregory, LLP
2800 Atlantic Center
1201 West Peachtree Street, N.E.
Atlanta, GA 30309
[Counsel for Broadslate Networks, Globe Telecommunications, Knology]

Dulaney L. O'Roark III, Esquire
WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328

Charles E. Watkins, Esquire
Senior Counsel
Covad Communications Company
1230 Peachtree Street , N.E., 19th Floor
Atlanta, GA 30309

Rose Mulvany Henry, Esquire
Birch Telecom of the South, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108
[Counsel for Birch Telecom]

This 31st day of July, 2003.

Bennett L Ross

499723