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November 1, 2004

DELIVERED BY HAND

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

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

Dear Mr. McAlister:

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Fourteenth 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,

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)

555418/555374

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

BELLSOUTH TELECOMMUNICATIONS, INC.'S FOURTEENTH 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 fourteenth 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 (June, July, and August 2004). 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)

CRSECSRL / Region / RNS (June & July)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system CRSECSRL (Customer Record Information System) 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 may be relatively minor (based on current data, the differential is approximately 1 second). The average response interval for June through August 2004 for CLECs is 3.89 seconds compared with the retail analogue of 2.91 seconds. These slight differences in response intervals in a given month do not impede a CLEC's ability to secure information in a timely manner.

In addition, as reflected in the July 2004 data notification, BellSouth identified an issue that caused some intervals to be calculated incorrectly. BellSouth resolved this issue in ENCORE Release 16.0 with August 2004 data. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data).

CRSECSRL / Region / ROS (June & July)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system CRSECSRL by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (based on current data, the differential is approximately 1.3 seconds). The average response interval for June through August 2004 for CLECs is 3.89 seconds compared with the retail analogue of 2.55 seconds. Slight differences in response intervals in a given month do not impede a CLEC's ability to secure information in a timely manner.

In addition, BellSouth identified an issue that caused some intervals to be calculated incorrectly. BellSouth resolved this issue in ENCORE Release 16.0 with August 2004 data. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data).

COFFI / Region / RNS (June, July & August)

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 may be relatively minor (based on current data, the differential is approximately 0.4 seconds). The average response interval for June through August 2004 for CLECs is 3.03 seconds compared with the retail analogue of 2.62 seconds. Slight differences in response intervals in a given month do not impede a CLEC's ability to secure information in a timely manner.

In addition, BellSouth identified an issue that caused some intervals to be calculated incorrectly. BellSouth resolved this issue in ENCORE Release 16.0 with August 2004 data. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem

by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data)

In August 2004, there was an average difference of 0.003651 seconds between retail and wholesale. While the parity reflects "No", there was virtually no difference in the performance levels of wholesale and retail for this submetric.

RSAG by TN / Region / RNS (June & July)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system RSAG (Regional Street Address Guide by Telephone Number) 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 may be relatively minor (based on current data, the differential is approximately 0.7 seconds). The average response interval for June through August 2004 for CLECs is 3.00 seconds compared with the retail analogue of 2.28 seconds. Slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner.

In addition, BellSouth identified an issue that caused some intervals to be calculated incorrectly. BellSouth resolved this issue in ENCORE Release 16.0 with August 2004 data. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data)

RSAG by TN / Region / ROS (June & July)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system RSAG (Regional Street Address Guide by Telephone Number) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (based on current data, the differential is approximately 0.2 seconds), The average response interval for June through August 2004 for CLECs is 3.00 seconds compared with the retail analogue of 2.76 seconds. Slight differences in response intervals in a given month should not impede a CLEC's ability to secure information in a timely manner.

In addition, BellSouth identified an issue that caused some intervals to be calculated incorrectly. BellSouth resolved this issue in ENCORE Release 16.0 with August 2004 data. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data).

DSAP / Region / RNS (July & August)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system DSAP (Direct order entry Support Application) 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 may be relatively minor (based on current data, the differential is approximately 4.5 seconds). The average response interval for June through August 2004 for

CLECs is7.04 seconds compared with the retail analogue of 2.54 seconds. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data). Also, currently, PMAP is including additional CSR or RSAG query time in the calculation of LENS Due Date (DSAP) duration. BellSouth proposes to exclude CSR and RSAG time from the DSAP duration. (RQ5771 - CSR and RQ5780 – RSAG Scheduled for Nov/2004 Data).

DSAP / Region / ROS (July & August)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system DSAP (Direct order entry Support Application) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (based on current data, the differential is approximately 4.7 seconds). The average response interval for June through August 2004 for CLECs is 7.04 seconds compared with the retail analogue of 2.35 seconds. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data). Also, currently, PMAP is including additional CSR or

RSAG query time in the calculation of LENS Due Date (DSAP) duration. BellSouth proposes to exclude CSR and RSAG time from the DSAP duration. (RQ5771 - CSR and RQ5780 – RSAG Scheduled for Nov/2004 Data).

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

PSIMS / Region / RNS & ROS (June, July & August)

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 3,200 queries per month from June through August 2004, with only 502 queries for PSIMS in August in Georgia. Due to the TAG retirement schedule and the low volume of CLEC queries performed each month, a detailed system analysis is not warranted at this time.

CRSECSRL / Region / RNS (July & August)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system CRSECSRL (Customer Record Information System) 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 may be relatively minor (based on current data, the differential is approximately 11 seconds). The average response interval for June through July 2004 for CLECs is13.78 seconds compared with the retail analogue of 2.91 seconds. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for

timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data). BellSouth identified two defects in the TAG servers that impacted response intervals in July and August. Both of these defects caused the TAG servers to stop functioning for short periods of time but would cause the queries that were in progress to timeout. As stated above, the timeouts were not being handled correctly by PMAP and caused the metric to be calculated incorrectly. One defect was corrected on 08/25/04 with a work around added for the second in late August. The second defect will be permanently corrected with November 2004 update.

CRSECSRL / Region / ROS (July & August)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system CRSECSRL (Customer Record Information System) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (based on current data, the differential is approximately 11 seconds). The average response interval for June through August 2004 for CLECs is 13.78 seconds compared with the retail analogue of 2.55 seconds. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data). BellSouth identified two defects in the TAG servers

that impacted response intervals in July and August. Both of these defects caused the TAG servers to stop functioning for short periods of time but would cause the queries that were in progress to timeout. As stated above, the timeouts were not being handled correctly by PMAP and caused the metric to be calculated incorrectly. One defect was corrected on 08/25/04 with a work around added for the second in late August. The second defect will be permanently corrected with November 2004 update.

RSAG by ADDR / Region / RNS (July & August)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system RSAG (Regional Street Address Guide by Address) 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 may be relatively minor (based on current data, the differential is approximately 1.5 seconds). The average response interval for June through August 2004 for CLECs is 3.94 seconds compared with the retail analogue of 2.50 seconds. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data). BellSouth identified two defects in the TAG servers that impacted response intervals in July and August. Both of these defects caused the TAG servers to stop functioning for short periods of time but would cause the queries that were in progress to timeout. As stated above, the timeouts were not being handled correctly by PMAP and caused the metric to be calculated incorrectly. One defect was corrected on 08/25/04 with a

work around added for the second in late August. The second defect will be permanently corrected with November 2004 update.

RSAG by TN / Region / RNS (July & August)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system RSAG (Regional Street Address Guide by Telephone Number) 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 may be relatively minor (based on current data, the differential is approximately 2 seconds). The average response interval for June through August 2004 for CLECs is 4.51 seconds compared with the retail analogue of 2.28 seconds. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data). BellSouth identified two defects in the TAG servers that impacted response intervals in July and August. Both of these defects caused the TAG servers to stop functioning for short periods of time but would cause the queries that were in progress to timeout. As stated above, the timeouts were not being handled correctly by PMAP and caused the metric to be calculated incorrectly. One defect was corrected on 08/25/04 with a work around added for the second in late August. The second defect will be permanently corrected with November 2004 update.

RSAG by TN / Region / ROS (June & July)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system RSAG (Regional Street Address Guide by Telephone Number) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using ROS may be relatively minor (based on current data, the differential is approximately 1.75 seconds). The average response interval for June through August 2004 for CLECs is 4.51seconds compared with the retail analogue of 2.76 seconds. However, another small issue remains with the data calculation. BellSouth is adding the issue the November PMAP update. Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. PMAP counted these erroneous intervals in the data. BellSouth proposes to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755 Scheduled for Nov/2004 Data). BellSouth identified two defects in the TAG servers that impacted response intervals in July and August. Both of these defects caused the TAG servers to stop functioning for short periods of time but would cause the queries that were in progress to timeout. As stated above, the timeouts were not being handled correctly by PMAP and caused the metric to be calculated incorrectly. One defect was corrected on 08/25/04 with a work around added for the second in late August. The second defect will be permanently corrected with November 2004 update.

OSS-4: RESPONSE INTERVAL (MAINTENANCE & REPAIR)

DLR / <= 10 sec. / Region (June, July & August)

DLR / > 10 sec. / Region (June, July & August)

This sub-metric captures the legacy system response interval for Maintenance and Repair Operational Support Systems ("OSS") for accessing the Detailed Line Record ("DLR"). BellSouth determined that the slight differences in response interval for the CLECs and BellSouth retail accessing the DLR system is primarily attributable to the different uses to which the system is put. In addition, with the replacement of DLR by the CRIS legacy system, the volume of CLEC queries has decreased dramatically, which makes it difficult for BellSouth to implement any system enhancements that would effectively improve overall performance.

LMOSupd / <= 4 sec. / Region (June, July & August)

LMOSupd / <= 10 sec. / Region (June, July & August)

LMOSupd / > 10 sec. / Region (June, July & August)

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 June through August 2004, 97% of CLEC transactions were returned in 4 seconds or less, and more than 99.5% 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.

LNP Gateway / <= 4 sec. / Region (July & August)

This measure captures the legacy system access times for Maintenance and Repair OSS for the Local Number Portability ("LNP") Gateway 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 June through August 2004, 99.5% of CLEC transactions were returned in 4 seconds or less, and more than 99.8% of CLEC transactions were returned in 10 seconds or less. Given such performance, any slight differences with BellSouth retail do not impede a CLEC's ability to secure information in a timely manner.

OSPCM / <= 4 sec. / Region (June, July & August)

OSPCM / <= 10 sec. / Region (June & August)

OSPCM / > 10 sec. / Region (June & August)

This measure captures the legacy system access times for Maintenance and Repair OSS for the Outside Plant Contract Management System ("OSPCM"). 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 June through August 2004, over 30% of CLEC transactions were returned in 4 seconds or less, and more than 99.5% of CLEC transactions were returned in 10 seconds or less. Given such performance, any slight differences with BellSouth retail do not impede a CLEC's ability to secure information in a timely manner.

SECTION 2: ORDERING

O-2: ACKNOWLEDGEMENT MESSAGE COMPLETENESS

TAG/LENS/XML (July & August)

BellSouth returned 361,578 of 361,579 (1 missed) acknowledgements in July and 322,223 of 322,226 (3 missed) acknowledgements in August 2004. However, to meet the 100% benchmark, all acknowledgements would have to be met in each month, which is a challenging task.

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

Business / Region (June, July & August)

BellSouth continues to reiterate that this segment's complexity – coupled with its low volume – makes it difficult to realize significant flow-through improvement that can be sustained much beyond 85%. Results can be easily skewed up or down for otherwise minor issues due to the low volume and complexity of orders in this sub-metric. The business segment amounted to a monthly average of only 1.2% of total mechanized LSR volume for the three (3) months covered by this report.

BellSouth identified an error condition that is causing certain wholesale Business requests (since mid-May) to fall out for manual processing. Preliminary review indicates that the error affects approximately 600 LSRs per month, or approximately 5% of CLEC LSR monthly volume in this Business Resale category. BellSouth has opened a system change request to resolve this issue. The change request will be prioritized in a future release. BellSouth processed over 88% of the business orders that were submitted on a fully mechanized basis during this period.

O-8: REJECT INTERVAL

UNE 2W Analog Loop w/LNP Non Design / Electronic (June & August)

In June 2004, BellSouth returned 14 of 15 rejected LSRs within the 1-hour benchmark and 20 of 21 in August. However, to meet the 97% benchmark, all 15 and 21 rejected LSRs would have to be met in each month, respectively. With such small volumes only perfection would meet the benchmark.

Local Interconnection Trunks / Manual (June & July)

There were only a total of 35 ASRs rejected during the three month period of June through August 2004. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions.

UNE ISDN Loop / Partial Electronic (June, July & August)

2-Wire Analog Loop Design / Partial Electronic (June & August)

2-Wire Analog Loop Non Design / Partial Electronic (June & August)

LNP Standalone / Partial Electronic (June, July & August)

The majority of these submetrics were missed due to the small volumes of LSRs rejected during the period. For example, in August 2004 BellSouth returned 25 of 28 rejected LSRs for UNE ISDN loops within the 7 hour benchmark for 89.29%. However, 26 of 28 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. BellSouth identified two main issues that it will correct with ENCORE Release 17.0 currently scheduled in November 2004. First, repeated facility checks are being made when no response is received from the facility assignment system. The other is a problem with PONs that receives an automatic FOC from the system that should

have been auto-clarified back to the CLEC. To correct this issue, a service representative must manually correct the LSR, which classifies it as partial mechanized but is outside the 7 hour benchmark.

O-9: FIRM ORDER CONFIRMATION TIMELINESS

Combo Other / Electronic (June, July & August)

EELs / Electronic (June, July & August)

BellSouth returned 17 of 19 FOCs within the 3-hour benchmark in June, 9 of 12 in July and 8 of 10 in August 2004. (Misses for Combo Other and EELs are the same exact PONs, which are counted for both sub-metrics.). BellSouth cannot 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.

UNE ISDN Loops / Electronic (July & August)

BellSouth returned 583 of 624 FOCs within the 3-hour benchmark during the period of June through August 2004. The 93.4% (583/624) is just 10 FOCs under the 95% benchmark for the entire three month period. BellSouth did not identify any systemic issues other than some miscellaneous outages of the down stream systems needed to process the FOCs electronically during July and August 2004. Recently, BellSouth learned that PMAP is not accurately excluding OSS maintenance windows for UNE ISDN Loop orders. A PMAP change request has been opened to resolve this issue. An implementation date has not been determined at this time.

UNE Local Transport / Manual (July & August)

BellSouth returned 6 of 7 FOCs within the 24-hour benchmark in July and August 2004. BellSouth cannot 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 Residence / Partial Electronic (June & August)

Resale Business / Partial Electronic (June & August)

Combo Other / Partial Electronic (June, July & August)

EELs / Partial Electronic (June, July & August)

xDSL / Partial Electronic (June, July & August)

Line Sharing / Partial Electronic (June & July)

LNP (Standalone) / Partial Electronic (June & July)

2-Wire Analog Loop w/LNP Non-Design / Partial Electronic (June & July)

Other Design / Partial Electronic (June, July & August)

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. 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 be handled by the service representatives within the 7 hour benchmark. BellSouth is performing additional reviews with individual employees to improve performance. Also, a small 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 LSR FIRM ORDER CONFIRMATION RESPONSE TIME MANUAL

xDSL (July & August)

BellSouth met 7 of 8 inquiries within the 4-business day benchmark in July and 3 of 4 inquiries within the benchmark in August 2004. However, to meet the 95% benchmark, all 8 and 4 inquiries would have to be met in each month, respectively, which is a challenging task.

O-11: FIRM ORDER CONFIRMATION AND REJECT RESPONSE COMPLETENESS

Combo Other / Electronic (June, July & August)

BellSouth's analysis for these sub-metrics revealed a system issue that caused incorrect logging of some Rejects. A defect was implemented in ENCORE Release 15.0 on 03/14/04 to address this key issue. A PMAP code change was implemented with August data to resolve this issue. In August 2004, BellSouth responded to 21 of 22 LSRs. However, a 97% benchmark requires all 22 LSRs to meet parity.

Combo Other / Partial Electronic (June, July & August)

This submetric continues to perform at a level of 91% or better. 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.

INP Standalone / Manual (July & August)

Local Interconnection Trunks / Manual (June & July)

UNE Loop Port Combos / Manual (June, July & August)

UNE xDSL / Manual (July & August)

BellSouth returned FOCs and Rejects for 95% or higher of the LSRs that were submitted during the period of June through August 2004 for all of these submetrics. The major issue causing BellSouth to miss the 97% benchmark was the CLECs submitting a change to the previous LSR before the initial response had been provided. BellSouth only responds to the latest version at the time of the manual response.

SECTION 3: PROVISIONING

P-2B: PERCENTAGE OF ORDERS GIVEN JEOPARDY NOTICES

UNE 2W Analog Loop Non-Design (June, July & August)

UNE Combo Other (June, July & August)

UNE Digital Loops < DS1 (June, July & August)

UNE Digital Loops => DS1 (June, July & August)

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 % 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 Loop & Port Combo / < 10 Circuits / Dispatch (June & July)

There were 9,011 orders processed during the period of June through August 2004. On average, these orders were provisioned in less than 5.6 days, while the retail orders were processed in 5.3 days. BellSouth did not identify any systemic issues for these orders. Slight differences in completion intervals in a given month do not impede a CLEC's ability to meet customer requests in a timely manner.

UNE Loop & Port Combo / < 10 Circuits / Dispatch In (June, July & August)

There were 38,296 orders processed during the period of June through August 2004. On average, these orders were provisioned in less than 2.6 days, while the retail orders were

processed in 2.0 days. BellSouth did not identify any systemic issues for these orders. Slight differences in completion intervals in a given month do not impede a CLEC's ability to meet customer requests in a timely manner.

UNE Other Non-Design / < 10 Circuits / Non Dispatch (June, July & August)

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.

2W Analog Loop Non Design / < 10 Circuits / Dispatch In (July & August)

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. The majority of these circuits would have met the retail analogue results if compared with the dispatch intervals. Efforts are being pursued to create a one-day interval for wholesale orders where the facility is in place from the customer location to the serving central office main frame for this product.

2W Analog Loop w/LNP Non Design / < 10 Circuits / Dispatch In (June, July & August)

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. The majority of these circuits would have met the retail analogue results if compared with the dispatch intervals. Efforts are being pursued to create a one-day interval for wholesale orders where the facility is in place from the customer location to the serving central office main frame for this product.

UNE Combo Other / < 10 Circuits / Dispatch (June, July & August)

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. 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 Combo Other / < 10 Circuits / Dispatch In (July & August)

There were only a total of eight (8) completed orders for this submetric in July and August 2004. BellSouth cannot perform a meaningful root cause analysis on such a small universe of transactions.

UNE ISDN / < 10 Circuits / Non-Dispatch (June, July & August)

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 (June, July & August)

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 (June, July & August)

EELs / < 10 Circuits / Non Dispatch 30% 5 days (July & August)

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. 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 (June, July & August)

Digital Loops < DS1 / < 10 Circuits / Non-Dispatch (June, July & August)

The wholesale results did not meet the parity comparison in June through August 2004. 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 Loop & Port Combo / < 10 Circuits / Dispatch (June & July)

UNE Loop & Port Combo / < 10 Circuits / Dispatch In (June, July & August)

UNE Other Non-Design / < 10 Circuits / Non Dispatch (June, July & August)

2W Analog Loop Non Design / < 10 Circuits / Dispatch In (July & August)

2W Analog Loop w/LNP Non Design / < 10 Circuits / Dispatch In (June, July & August)

UNE Combo Other / < 10 Circuits / Dispatch (June, July & August)

UNE Combo Other / < 10 Circuits / Dispatch In (July & August)

UNE ISDN / < 10 Circuits / Non-Dispatch (June, July & August)

UNE UDC/IDSL / < 10 Circuits / Non-Dispatch (June, July & August)

EELs / < 10 Circuits / Dispatch 30% 5 days (June, July & August)

EELs / < 10 Circuits / Non Dispatch 30% 5 days (July & August)

Digital Loops < DS1 / < 10 Circuits / Dispatch (June, July & August)

Digital Loops < DS1 / < 10 Circuits / Non-Dispatch (June, July & August)

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 Centrex / < 10 Circuits / Non Dispatch (June & July)

There were a total of 23 completed orders with 5 reported troubles during the period of June through August 2004. BellSouth cannot perform a meaningful root cause analysis on such a small universe of transactions.

UNE Digital Loop ≥ DS1/ > 10 Circuits / Non Dispatch (June & July)

There were a total of 50 completed orders with 4 reported troubles during the period of June through August 2004. BellSouth cannot perform a meaningful root cause analysis on such a small universe of transactions.

P-13: % LNP DISCONNECT TIMELINESS

P-13D: % Disconnect Timeliness Interval for Non Trigger Orders (July & August)

BellSouth missed the benchmark of 4 hours for this submetric for July and August 2004. The benchmark for this sub-metric is 95% within 4 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.

In July, BellSouth disconnected 143 of 469 telephone numbers within the 4 hour benchmark. Two hundred sixty four (264) of the missed numbers were associated with two service orders. Excluding the two missed orders, BellSouth met over 87% of the disconnects within the 4 hour benchmark. While August results show only 30 of 39 numbers being disconnected within the 4 hour period, BellSouth cannot perform a meaningful root cause analysis on such a small volume of disconnects.

SECTION 4: MAINTENANCE AND REPAIR

M&R-1: MISSED REPAIR APPOINTMENTS

Resale Residence / Non Dispatch (June & July)

There were a total of 386 scheduled repair appointments with 11 appointments not being completed on time during the period of June through August 2004. BellSouth cannot perform a meaningful root cause analysis on such a small universe of missed appointments.

M&R-2: CUSTOMER TROUBLE REPORT RATE

Residence / Dispatch (June, July & August)

Business / Dispatch (July & August)

Design (Specials) / Dispatch (June, July & August)

Design (Specials) / Non-Dispatch (June, July & August)

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 June through August 2004. BellSouth did not identify any systemic issues for any of the troubles reported in these sub-metrics.

Combo Other / Dispatch (June, July & August)

Approximately 97% of all in-service lines were trouble free during the period of June through August 2004. 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 3.5 million compared with 9 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.

UNE xDSL / Dispatch (June, July & August)

Over 99% of all in-service lines were trouble free during the period of June through August 2004. 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 (July & August)

Over 99% of all in-service lines were trouble free during the period of June through August 2004. 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 (June, July & August)

Over 97% of all in-service lines were trouble free during the period of June through August 2004. 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 45 times larger in volume compared with the CLEC volumes.

UNE Digital Loop <DS1 / Dispatch (June, July & August)

UNE Digital Loop ≥DS1 / Dispatch (June, July & August)

Over 98% of all in-service lines were trouble free during the period of June through August 2004. 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

Local Transport / Non-Dispatch (June, July & August)

There were a total of 26 reported troubles during the period of June through August 2004. BellSouth cannot perform a meaningful root cause analysis on such a small universe of transactions.

Digital Loops >=DS1 / Non-Dispatch (July & August)

The CLEC average duration during this period was 3.1 hours compared to 1.2 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 2 hour difference should not be a problem for the CLECs. In July 2004, there were a total of 38 trouble reports for all CLECs that averaged 4 hours clearing time. In August 2004, there were a total of 45 reported troubles for this submetric with the average clearing time falling to 2 hours. Sixteen (16) of the 45 troubles reported in August were due to the failure of a cross-connect device in the Norcross central office. This failure was corrected fairly quickly and actually lowered the duration time. With such a small number of reports, one trouble report or several quick "fixes" can have a major impact on the monthly average. With the retail analogue having over 1,000 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. In December 2003, there were a total of 82 CLEC reports with an average duration of 1.29 hours which was less than the 1.68 hours for the retail analogue. The May 2004 result for CLECs was 4.54 hours for just 47 trouble reports. The

durations are more about the small volumes than the actual average completion intervals. BellSouth did not identify any "systemic" issues concerning this submetric.

SECTION 5: BILLING

B-1: INVOICE ACCURACY

Interconnection (July & August)

During the period of June through August 2004, the CLECs and BellSouth retail received 98% invoice accuracy for this submetric. In July 2004, the CLECs received 98.69% accuracy compared with the accuracy for the retail analogue of 98.97%. In August 2004, the CLECs received 98.80% compared with the retail analogue of 99.22%. With less than a 1% difference in the comparisons, there were no systemic issues identified for any of the adjustments reported during the period. However, in July one CLEC was billed an incorrect rate due to a failure to remove an outdated USOC from their BBI rate file and was given a $12,743 adjustment. In August, a transfer of ownership in collocation space from one CLEC to another identified an existing circuit that did not meet BST standards and a new circuit had to be established. Due to an employee error the customer charge of $3,712 for establishing the new circuit was not waived and had to be adjusted. Both of these adjustments caused the measurement to be out of parity.

SECTION 11: CHANGE MANAGEMENT

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

Region / Corrected within 10 Business Days (June, July & August)

Region / Corrected within 30 Business Days (June, July & August)

Region / Corrected within 45 Business Days (June, July & August)

BellSouth did not meet the 95% benchmark for any of the above submetrics during the June through August 2004 time period. As of the end of August 2004, there were a total of 27 type 6 change requests pending. A total of 13 severity 2, 11 severity 3 and three severity 4 requests make up the 27 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. As stated previously, BellSouth has reduced its backlog and plans to eliminate the majority of these items by year-end.

CM-9: NUMBER OF DEFECTS IN PRODUCTION RELEASES

Region / Severity 2 (July & August)

There was one defect in July and two in August for this submetric. With a zero defect benchmark, BellSouth must provide error free releases to meet parity. BellSouth cannot perform a meaningful root cause analysis on such a small universe of transactions.

Region / Severity 3 (July & August)

There were two defects in July and August for this submetric. With a zero defect benchmark, BellSouth must provide error free releases to meet parity. BellSouth cannot perform a meaningful root cause analysis on such a small universe of transactions.

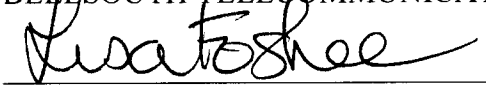
CM-11: PERCENT OF CHANGE REQUESTS IMPLEMENTED WITHIN 60 WEEKS

Region / Type 5 (July & August)

There were a total of 13 change requests during the period of July through August 2004 for this submetric. With a 95% benchmark, BellSouth must make 100% of all implementation dates to meet parity. BellSouth cannot perform a meaningful root cause analysis on such a small universe of transactions.

Respectfully submitted, this 1st day of November 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE
Docket No. 7892-U

This is to certify that on this 1st day of November, 2004, I served a copy of the foregoing, upon known parties of record, via electronic mail as follows:

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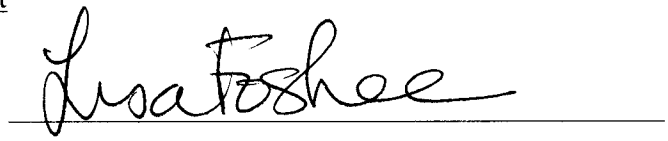

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