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January 2, 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 eighteen (18) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Response to CLEC Comments on Proposed January and February 2003 PMAP Changes in the above-referenced docket. I would appreciate your filing this document and returning the three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Yours very truly,


Bennett L. Ross

BLR:nvd
Enclosures

cc: Mr. Leon Bowles
Parties of Record

474653/434223

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

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

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE
TO CLEC COMMENTS ON PROPOSED JANUARY AND
FEBRUARY 2003 PMAP CHANGES**

I. INTRODUCTION

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits its response to the Comments filed on December 17, 2002 by AT&T Communications of the Southern States, MCI WorldCom, and Covad Communications (collectively "CLECs"), concerning BellSouth's Notification Report for the January 2003 data month and preliminary Notification Report for the February 2003 data month. The CLECs request that the Commission: (1) require BellSouth to "clarify" the changes associated with Item 4 on the January 2003 Report; (2) reject the changes associated with Item 5 on the January 2003 Report; and (3) reject the changes associated with Items 12 and 14 on the preliminary February 2003 Report. Other than clarification of Item 4, which BellSouth is providing, the Commission should deny the CLECs' requests.

II. DISCUSSION

A. Item 4 (January 2003 Report)

Item 4 in BellSouth's Notification Report for the January 2003 data month addresses a problem identified by BearingPoint in the calculation of Reject intervals and Firm Order Confirmation ("FOC") timeliness for partially mechanized and manual Local Service Requests

("LSRs"). The problem is the hours of operation of BellSouth's Local Carrier Service Centers ("LCSCs") being improperly captured in these ordering measures because one LCSC operates on Eastern Time ("ET"), while the other operates on Central Time ("CT"). The change proposed by BellSouth will resolve this problem.

To illustrate the problem, consider a partially mechanized LSR for an unbundled loop that is received by BellSouth via EDI on Monday at 8:30 a.m. ET (7:30 a.m. CT). The LSR could be processed by the LCSC in either Atlanta or Birmingham, Alabama, and BellSouth does not know which center will actually process the LSR at the point when the timestamp is applied to the LSR. If the LSR is processed by the Atlanta LCSC, work can begin immediately because the Atlanta location processes UNE LSRs from 8:00am to 6:00pm ET on weekdays. However, if that LSR is processed by the Birmingham location, work cannot begin for another half hour because the Birmingham location only processes UNE LSRs between 8:00am and 6:00pm CT.

Under the Service Quality Measurement ("SQM") plan, only those hours when the LCSCs are in fact open are included in calculating the Reject Interval and FOC timeliness. Currently, PMAP determines the hours that both the Atlanta and Birmingham locations are open based on the Birmingham LCSC's hours of operation. In the above example, both the Atlanta and Birmingham locations are treated as being open from 8:00 a.m. to 6:00 p.m. CT (9:00 a.m. to 7:00 p.m. ET), and, consistent with the SQM, all other hours are excluded from the calculation of Reject and FOC duration. In the above example, if the Atlanta LCSC were to return a FOC on the LSR that was received at 8:30 a.m. ET at 12:00 p.m. ET, the FOC interval would be recorded as only 3 hours (8:00 a.m. CT to 11:00 a.m. ET), even though it actually took the Atlanta LCSC 3.5 hours to return the FOC. Likewise, if the Atlanta LCSC returned a FOC the following day at 8:00 a.m. ET, the FOC interval would be calculated as 10 hours (8:00 a.m. CT to 6:00 p.m. CT),

when the correct interval was 9.5 hours (8:30 a.m. ET to 6:00 p.m. ET). Under the current methodology, the duration interval is accurate for the Birmingham LCSC, but incorrectly excludes up to an hour in the morning when the Atlanta LCSC is open and incorrectly includes up to an hour in the evening when the Atlanta LCSC is closed.

Since BellSouth cannot determine which LCSC will process an LSR when the timestamp is applied, BellSouth has proposed to treat both locations, for measurement purposes, as if they opened at the same time as the Atlanta LCSC (8:00 a.m. ET or 7:00 a.m. CT), and closed at the same time as the Birmingham LCSC (7:00 p.m. ET or 6:00 p.m. CT). Only the hours outside of this timeframe would be excluded from the duration interval, which results in the Birmingham LCSC being treated as if it opened an hour earlier that it actually opens, and the Atlanta LCSC being treated as if it closed an hour later than it actually closes. While not perfect and while causing an artificial lengthening of the FOC or Reject interval measurement by up to an hour for LSRs processed in either location, this change will ensure that any delays in returning FOCs and Rejects are not masked by the difference in time zones.

In their comments, the CLECs acknowledge the possibility that they have misunderstood this proposed change. That appears to be the case, because the situation postulated in the CLECs' comments – that a FOC returned at 3:00 p.m. ET would be measured as having been returned at 2:00 p.m. ET -- would not occur. Both the LSR receipt time and the FOC and Reject return time are now, and will continue to be calculated based on Central Time (CT). In the CLECs' example, a FOC returned at 3:00 p.m. ET would not be recorded as 2:00 p.m. ET, but rather would be recorded as 2:00 p.m. CT. The LSR receipt time also would be recorded based on Central Time, so the elapsed time to return the FOC would be captured correctly in the situation hypothesized by the CLECs.

As stated in the workshop and in the January Notice, this proposal only changes the manner in which the *opening* and *closing* times for the LCSC locations will be determined. Only those hours when the LCSC is open should be used to calculate intervals for returning FOCs and Rejects on partially mechanized and non-mechanized LSRs, and BellSouth proposes to change the PMAP code to expand the LCSC hours of operation utilized in PMAP by one hour, even though both centers are not actually open during these times.

As stated in the workshop, the only impact of this change is that some FOCs and Rejects that BellSouth returns within the allotted time will be counted as missing the interval in the measurement, which makes BellSouth's performance look worse than it actually is. However, BellSouth did not indicate "that it intends to treat all LSRs as though they were received based on Eastern, and all Firm Order Confirmations ("FOCs") and LSRs returned as though they were processed on central time," as the CLECs claim. Also, the CLECs' concern about whether a CLEC sends the LSR from the Central or Eastern time zone affects this proposal is misplaced. The location where the CLEC transmits the LSR is irrelevant, because the system applies the same receipt timestamp regardless of the time zone where the LSR originated. BellSouth believes this clarification should adequately address the CLECs' concern.

B. Item 5 (January 2003 Report)

As set forth in BellSouth's Notification Report for January 2003 and as clarified in its letter of December 17, 2002, Item 5 concerns an issue for retail and wholesale data identified by BearingPoint's PMR-5 test for the "Provisioning: Troubles Within 30 Days of Service Order Completion" SQM Report. Currently, PMAP is erroneously calculating the results of this measure for trunks. However, because of the concern expressed by several parties on the December 6, 2002 industry call about the manner in which BellSouth proposed to correct this

problem, BellSouth has decided not to implement the proposed change. In its letter of December 17, 2002, BellSouth advised the Commission and the parties that BellSouth will continue the current method of reporting data for this measure. Consequently, there is no need for the Commission to reject a proposed change that BellSouth has withdrawn.

C. Items 12 and 14 (February 2003 Report)

In Item 12 of its preliminary February Data Notification, BellSouth described a proposed change to the Percent Repeat Troubles Within 30 Days measure (M&R-4) to ensure that trouble reports in LMOS are being correctly captured. As BellSouth explained in its letter of December 17, 2002, there are three dates associated with trouble reports that relate to this measure in LMOS: received date, cleared date, and closed date. The received date is the date the trouble report was received, the cleared date is the date the technician corrected the trouble condition and closes the report, and the closed date is the time that the data center processor is updated. Since the inception of the M&R-4 measure, BellSouth has been calculating performance results based on the cleared date. However, incorrect coding was introduced in connection with a prior PMAP change (Item 10 on BellSouth's June 2002 Data Notification), which caused the closed date to be used incorrectly in calculating performance results. For some customers located in a different time zone from the LMOS data processor, it is possible to have a closed date and time stamp earlier than the cleared date and time stamp, which results in a missed repeat report. The change BellSouth is proposing would restore use of the cleared date in calculating results.

In Item 14 of its preliminary February Data Notification, BellSouth described a similar change that it was proposing for capturing trouble tickets in WFA under the M&R-4 measure. Currently, for WFA tickets in PMAP, the interval to determine whether a repeat trouble occurs is calculated from the date the first trouble is received to the date when the second trouble ticket is

resolved. It should be calculated from the date the first trouble ticket is resolved to the date the second trouble report is received. Consequently, the numbers of repeat troubles for retail and wholesale are slightly understated. The change BellSouth is proposing would correct this situation.

The CLECs take issue with both of these proposed changes, claiming that the “cleared date” should not be used in calculating repeat trouble intervals. Instead, the CLECs argue that “the interval BellSouth should be using to determine whether a closed trouble would be included in the numerator of this measure is the *receipt* of first trouble to the *receipt* of the subsequent trouble.” CLEC Comments at 4 (emphasis in original). The CLECs’ argument is both misplaced and unworkable.

First, the M&R-4 measure is intended to capture the percentage of repeat troubles. Under the CLECs’ interpretation, however, performance results would be calculated regardless of whether there has been an actual trouble on the line. In other words, according to the CLECs, if a trouble ticket is received on Monday, but there is no actual trouble on the line, the receipt of a subsequent trouble ticket two weeks later would result in a repeat trouble. It is difficult to see how one can have a repeat trouble when there was never any trouble to begin with.

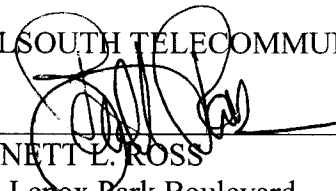
Second, although the CLECs claim that the M&R-4 measure contains “no reference to cleared troubles,” the definition of the measure talks in terms of “closed trouble reports on the same line/circuit . . .” The calculation of this measure also refers explicitly to “closed customer troubles” and “trouble reports closed.” In other words, it is entirely consistent with the SQM to calculate the interval of repeat troubles from the date the first trouble ticket is resolved (i.e., the date the technician corrects the trouble condition and closes the report) to the date when the second trouble ticket is received, as BellSouth proposes.

Finally, under the CLECs' interpretation, trouble reports that should be excluded as required by the SQM would be included in performance results under the M&R-4 measure, which is inconsistent with the SQM. Since the exclusions for such items as CPE troubles or CLEC equipment troubles can only be determined once the first trouble ticket has been resolved, it makes no sense to base results upon the receipt of the first trouble ticket, as the CLECs advocate.¹

Because these two changes were identified on BellSouth's preliminary February 2003 Data Notification and are included on the Proposed Data Notification Report for February 2003, these changes can be discussed on the next industry call, which is scheduled for January 8, 2003. Consequently, there is no need for the Commission to take any action at this time and certainly no reason for the Commission staff to reject BellSouth's proposed changes.

Respectfully submitted, this 2nd day of January, 2003.

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¹ BellSouth acknowledges that the calculation of the M&R-4 measure refers to a trouble report being "logged," as noted by the CLECs. However, BellSouth believes that this term refers to the activity performed by the technician when he or she has corrected the trouble condition and closes the trouble report, which is more consistent with the purpose of the measure, than merely the receipt of a trouble report, as advocated by the CLECs.

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon parties of record, by electronic mail, with adequate postage thereon, addressed as follows:

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This 2nd day of January, 2003.

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