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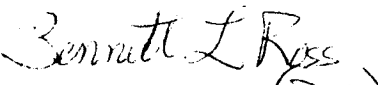
Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

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

Dear Mr. McAlister:

Enclosed herein for filing in the above-referenced proceeding please find an original and eighteen (18) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Emergency Motion to Establish Industry Taskforce and to Suspend New Measure P-11 (Service Order Accuracy). I would appreciate your filing same in the above-referenced docket and returning the three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Yours very truly,

  
Bennett L. Ross (vme)

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (via electronic mail)  
Mr. Patrick Reinhardt (via electronic mail)  
Parties of Record (via electronic mail)

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**BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION**

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

**BELLSOUTH TELECOMMUNICATIONS, INC.'S EMERGENCY MOTION  
TO ESTABLISH INDUSTRY TASKFORCE AND TO SUSPEND  
NEW MEASURE P-11 (SERVICE ORDER ACCURACY)**

**I. INTRODUCTION**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully files this emergency motion concerning the new performance measure P-11 (Service Order Accuracy), which the Commission adopted in its November 14, 2002 Order. This new measure requires that BellSouth's service order accuracy performance be calculated based upon a mechanized review of all partially mechanized Local Service Requests ("LSRs"), rather than a sample of all LSRs, as is currently the case.

As explained in greater detail below, BellSouth has encountered significant technical and practical problems in implementing the new P-11 measure. These problems are not unlike those encountered by Verizon, which has been ordered to implement a similar service order accuracy measure in its region but which to date has been unable to do so. BellSouth believes that it would be worthwhile for the industry to work cooperatively to address the problems encountered in calculating service order accuracy performance based upon a mechanized review of partially mechanized LSRs. Accordingly, BellSouth moves that the Commission establish an Industry Taskforce to address this issue and to submit a recommendation to the Commission within sixty

(60) days concerning the implementation of the new P-11 measure. BellSouth also moves that the Commission suspend the new P-11 measure until such time as the Commission has the opportunity to consider the Industry Taskforce's recommendation and to decide how best to proceed. In the meantime, BellSouth requests that it be granted leave to continue to report service order accuracy performance (and to pay any associated remedies) consistent with the current P-11 measure.

## **II. DISCUSSION**

In its January 12, 2001 Order approving the Service Quality Measurement ("SQM") Plan for BellSouth, the Commission adopted Measure P-11, which captures "the accuracy and completeness of a sample of BellSouth's service orders by comparing what was ordered and what was completed." Consistent with the SQM, BellSouth currently calculates service order accuracy performance using a statistically valid sample of all service orders, including those generated as a result of LSRs processed by BellSouth electronically or on a partially mechanized or manual basis.

During the workshops conducted last year as part of the Commission's review of the SQM, Competing Local Exchange Carriers ("CLECs") requested that Measure P-11 be modified. Specifically, several CLECs requested, among other things, that BellSouth begin reporting service order accuracy performance based upon a mechanized review of certain types of service orders rather than based upon a sample. According to these CLECs, such an approach would be consistent with the way Verizon had been ordered to report its service order accuracy performance. BellSouth had no objection to this proposal, and during the workshops, the parties negotiated various aspects of this new service order accuracy measure, which were ultimately adopted by the Commission in its November 14, 2002 Order.

In the fall of 2002, after the Commission had adopted the Staff's recommendation to modify the SQM, BellSouth began developing the software instructions (sometimes referred to as "code") necessary to implement the new P-11 measure. As this development work progressed, BellSouth encountered a number of technical problems that prevent BellSouth from implementing the new measure.

For example, an LSR submitted by a CLEC may have multiple versions. Generally, each time the CLEC resubmits a given LSR to make changes, a new version number is assigned to the changed LSR to distinguish it from earlier versions. However, the BellSouth system that issues the service orders does not track LSR version numbers. As a result, when comparing an LSR with multiple versions and the actual service order, BellSouth has been unable to develop a mechanism to identify mechanically which LSR version should be used to determine whether service was provisioned accurately and completely. Obviously, if an earlier version of the LSR is used for this comparison but that version was superseded by a later version, the comparison would indicate that the service was provisioned inaccurately, which may not be the case at all.

Likewise, by definition, there is a category of partially mechanized LSRs that fall out by design for manual handling by the Local Carrier Service Center ("LCSC"). This fallout is triggered when the CLEC populates a particular field in a particular manner. After the LSR falls out to the LCSC, the BellSouth service representative makes changes to these fields so that the order can be successfully provisioned by BellSouth's downstream systems. In such cases, when the LSR submitted by the CLEC and the order generated by the BellSouth service representative are compared, there will be differences in particular fields, which does not necessarily mean that the order was provisioned inaccurately. BellSouth has been unable to develop the coding logic that would be necessary to address this problem.

BellSouth also has encountered problems in developing the code necessary to review fields on the LSR which the CLECs requested and BellSouth agreed would be part of this mechanized process. One of these fields is the "Remarks" field. The "Remarks" field on an LSR is a free-flowing field that can be populated by the CLEC in numerous ways; this field will rarely, if ever, match identically the "Remarks" field on the service order. Another example is the "Feature Detail" field, which consists of floating identifiers and characters that are impossible to compare accurately and completely. This list is merely illustrative, as there are other fields that also have presented problems for BellSouth in implementing this new measure.

In implementing the new P-11 measure, BellSouth also has identified a practical problem that should be of concern to CLECs and this Commission. Currently, when confronted with an LSR that contains a minor problem, BellSouth's LCSC representatives are trained to fix the problem rather than clarifying the LSR back to the CLEC. Obviously, if the BellSouth LCSC representative makes a change to one of the fields subject to this new mechanized process, the LSR submitted by the CLEC and the service order generated by the service representative would be different. This would result in a finding that the service order was "inaccurate," even though the CLEC may have received the exact service it wanted. Under such circumstances, BellSouth may be left with little choice but to direct its service representatives to stop correcting problems on the LSRs, no matter how minor, which would cause a greater number of LSRs to be clarified back to the CLECs and delay CLEC customers getting service.

When BellSouth began encountering some of the coding problems described above, BellSouth immediately contacted Verizon to learn how it had implemented a mechanized service order accuracy process. BellSouth has had numerous discussions with Verizon representatives at various levels of the company on this subject. Much to BellSouth's surprise, according to the

representatives with whom BellSouth has spoken, Verizon continues to report service order accuracy performance based upon a sample and has been unable to implement the mechanized process. Verizon has been working on this project for well over one year, which has resulted in CLECs' agreeing to eliminate several of the fields that were originally part of the planned mechanized process. However, based upon BellSouth's discussions, it is unclear when, if ever, Verizon will be able to implement a mechanized service order accuracy process.

Under the circumstances, BellSouth believes that it would be beneficial for the industry in Georgia to work cooperatively on the new service order accuracy measure, as has been the case in Verizon's territory, and respectfully requests that the Commission establish an Industry Taskforce for this purpose. It is BellSouth's understanding that some of the CLEC representatives who participated in the workshops in Georgia are involved with this issue in Verizon's territory, which should facilitate the Industry Taskforce's work here. BellSouth believes that this Industry Taskforce should be convened promptly and be given sixty (60) days to submit a recommendation to the Commission concerning the new service order accuracy measure.

In the meantime, BellSouth respectfully requests that the new P-11 measure be suspended, at least until the Commission has the opportunity to review the Taskforce's recommendation and decide how best to proceed. At the same time, BellSouth should be directed to continue to report service order accuracy performance and to pay any associated remedies consistent with the current P-11 measure.

Respectfully submitted, this 20<sup>th</sup> day of February, 2003.

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**CERTIFICATE OF SERVICE**

**Docket No. 7892-U**

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

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