

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

February 21, 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:

In its November 14, 2002 and January 22, 2003 Orders in the above-referenced proceeding, the Georgia Public Service Commission ("Commission") directed that BellSouth Telecommunications, Inc. ("BellSouth") file an updated Service Quality Measurement ("SQM") Plan as well as the Self-Effectuating Enforcement Mechanism ("SEEM") Administrative Plan for the State of Georgia. Consistent with the Commission's Orders, enclosed herein for filing please find an original and eighteen (18) copies, as well as an electronic version, of: (1) an updated Georgia SQM Plan with an effective date of March 1, 2003, which reflects the changes ordered by the Commission, as well as a black-line version of this document indicating the changes that have been made; and (2) the Georgia SEEM Administrative Plan with an effective date of March 1, 2003. I would appreciate your filing same and returning the three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

In preparing these documents, BellSouth worked diligently to incorporate all of the changes directed by the Commission in its November 14, 2002 and January 22, 2003 Orders. In certain instances, BellSouth has made additional changes not specifically set forth in the Commission's Orders, but which BellSouth believes are necessary to ensure consistency with other aspects of the Commission's Orders. These changes are described briefly below.

First, the Commission found that the appropriate retail analog for line sharing and line splitting is ADSL Provided to Retail. BellSouth has revised the retail analog for line sharing and line splitting throughout the SQM in accordance with this finding.

Second, the Commission found that the appropriate retail analog for the UNE ISDN product was Retail ISDN – BRI and PRI and directed that this analog be included for purposes of BellSouth’s UNE ISDN performance as reported under Measures P-3 (Percent Missed Installation Appointments), P-4 (Average Completion Interval), and P-5 (Average Completion Notice Interval). Because UNE ISDN performance also is reported under Measures P-1 (Mean Held Order Interval), P-2B (Percentage of Orders Given Jeopardy Notice), P-4A (Average Completion Notice Interval), P-4B (Firm Order Average Completion Interval), and P-9 (% Provisioning Troubles Within 30 Days), BellSouth has included Retail ISDN – BRI and PRI as the appropriate retail analog for purposes of these measures as well.

Third, the Commission corrected the disaggregation levels for Measure P-7 (Coordinated Customer Conversions Interval) to reflect Unbundled Loops with INP and Unbundled Loops with LNP. BellSouth has made this same correction for Measure P-7B (Coordinated Customer Conversions – Average Recovery Time).

Fourth, the Commission adopted language to clarify the exclusion of order activities of BellSouth or the CLEC associated with internal or administrative use of local services. This language is as follows: “Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Records Orders, Listing Orders, Test Orders, etc., which may be coded C, N, R or T).” To be consistent, BellSouth has incorporated this same language in all the provisioning measures that contain this same exclusion.

Fifth, the Commission adopted new benchmarks for Measure O-9 (Firm Order Confirmation Timeliness) and established new disaggregated reporting levels consistent with these new benchmarks. However, the reporting levels for non-mechanized Local Service Requests (“LSRs”) under Measure O-9 inadvertently omitted the 24th hour. BellSouth has corrected this omission so that the reporting interval now reads $0 \leq 24$ hours and > 24 hours. This correction is consistent with the reporting intervals adopted by the Commission for fully mechanized and partially mechanized LSRs under Measure O-9.

Sixth, BellSouth has corrected the captions in Measures P-13B (Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date) and P-13C (Percent Out of Service < 60 Minutes). As adopted by the Commission, these measures erroneously contained the caption “Relating to BellSouth Experience” under the Data Retained section. BellSouth has changed this caption to read “Relating to BellSouth Performance,” consistent with other provisions of the SQM.

In its November 14, 2002 Order, the Commission directed that BellSouth modify the current Measure P-4 (Average Completion Interval) to create two separate measures – Measure P-4A and Measure P-4B. For Measure P-4A, the Commission directed that UNE Loop Design be added as an additional level of disaggregation to the SEEM Plan, which BellSouth has done. However, with this additional disaggregation level, BellSouth has clarified that the current UNE

Loop category under the SEEM Plan is limited to non-designed loops. Absent such clarification, there would be overlapping data in the SEEM disaggregation levels, resulting in BellSouth paying penalties twice for the same conduct, which presumably was not the Commission's intent.

For Measure P-4B, BellSouth exercised its best judgment in implementing the Commission's November 14, 2002 and January 22, 2003 Orders. Measure P-4B is intended to capture the time it takes BellSouth to provide service for the CLEC, which is measured from the time BellSouth first receives a valid LSR or Access Service Request ("ASR") until the time the order is completed. Because this time period includes the time associated with returning a Firm Order Confirmation ("FOC"), which is the same time captured in Measure O-9, BellSouth has added the exclusions and benchmarks under Measure O-9 to Measure P-4B. Without such additions, BellSouth's reporting of FOC timeliness and its provisioning performance would be skewed.

In its November 14, 2002 Order, the Commission adopted measures to monitor BellSouth's performance in the provisioning of interstate special access services, which are attached as Appendix G to the SQM. Although BellSouth unsuccessfully sought reconsideration of this issue, BellSouth continues to believe that the Commission lacks jurisdiction over interstate services regulated by the FCC and that the special access benchmarks adopted by the Commission lack any factual basis. However, the Commission's January 22, 2003 Order on Reconsideration makes clear that the Commission is requiring BellSouth to report this information merely for "diagnostic purposes," and, by filing the information required by the Commission, BellSouth does not waive any rights it might have to seek judicial review of the jurisdictional issues in this or any other docket or forum.

Because the special access measures adopted by the Commission were generic measures proposed at the FCC, they did not refer to BellSouth and did not reflect the manner in which special access services are ordered from and provisioned by BellSouth. For example, the measures contained references to "JCIG," which BellSouth has removed, and "ILEC," which have been substituted with BellSouth. BellSouth has made other changes to these special access measures to ensure consistency with the SQM and the manner in which BellSouth operates, which are described below.

First, because BellSouth can only measure when it receives the ASR on its side of the interface, BellSouth has revised the language in Measures SA-1, SA-2, SA-3, SA-4, and SA-6 to make clear that BellSouth will measure the ASR from the time it is received, not the time it was sent. This change is consistent with Measure O-9, which specifies that the FOC interval is measured from the "receipt of a valid LSR or ASR ..." BellSouth also has modified the format of the language setting forth the intervals in the Calculation Methodology of these measures to make it more inclusive and logical, although the intervals themselves have not been changed.

Second, BellSouth has modified the Levels of Disaggregation under these special access measures to more accurately depict the type of service and to better clarify the data that is being captured. Specifically, BellSouth has included DS3 (Non Optical) and DS3 (Optical OCN) as levels of disaggregation in all of the Special Access measures.

Third, BellSouth has deleted language from the special access measures that serves no useful purpose. For example, Projects are included in these measures under the Business Rules, but the Business Rules also contain additional language referring to how other ILECs define projects, which has been deleted. Likewise, in Measure SA-1, BellSouth has deleted language in the description of the measure referring to the "expectation" of the ILEC, which is unnecessary. Similarly, in Measures SA-2 and SA-6, BellSouth has deleted duplicative language in the Description of these measures which states that they are "essential to ensure that FOCs are being received in a timely manner from the ILEC." BellSouth also has deleted the term "normal" from the Business Rules for Measures SA-7 and SA-10, since this term has no meaning for measurement purposes.

Fourth, in Measures SA-3 and SA-4, BellSouth has modified the language to reflect BellSouth's terminology. BellSouth uses the term Customer Desired Due Date ("CDDD") as opposed to Customer Requested Due Date ("CRDD"). In BellSouth terms, Customer Not Ready ("CNR") is defined as Customer Not Ready ("SR"), No Access ("SA"), Customer Requests a Later Date ("SL"), and Customer Other ("SO"). These codes are used by BellSouth on service orders for missed appointments and have been incorporated in the measures. The Term Found Ok in SA-10 and SA-11 has been changed to NTF ("No Trouble Found") consistent with the terminology used by BellSouth.

Fifth, Measure SA-4 captures On Time Performance to FOC Due Date. The Definition and the Calculation Methodology for this measure reflect that on-time performance should be determined based upon circuits, not ASRs, which is the approach embodied in Measures P-4A and P-4B. However, the Business Rule for Measure SA-4 states that for measurement purposes the ASR is not considered to be complete until all circuits are complete, which conflicts with the Definition and the Calculation Methodology for this measure and would be duplicative of Measure SA-6 (Average Intervals – Requested Offered Installation), which captures completed ASRs. Accordingly, BellSouth has revised the Business Rule in SA-4 to measure on-time performance at the service order level. This modification also was made to the Business Rule in Measure SA-7 for the same reasons.

Sixth, BellSouth has modified the Business Rule for SA-5 to specify that the measure is based on the "latest valid" ASR. The last ASR may not be a valid ASR. This modification is consistent with language included in the SQM which specifies that it must be a "valid" LSR.

Seventh, Measure SA-8 is intended to measure trouble tickets following the completion of the service order. Therefore, BellSouth has modified the Business Rules of this measure to state

Mr. Reece McAlister

February 21, 2003

Page 5

that the calculation for the following 30 calendar days is based on the creation date of the trouble ticket as opposed to the "preceding" 30 days. This change is consistent with the language in Measure P-9 (% Provisioning Troubles Within 30 Days of Service Order Completion).

Eighth, BellSouth believes that it is appropriate to adopt the additional Levels of Disaggregation for Measure SA-8 that are established in Measures SA-9, SA-10 and SA-11 and visa versa. Therefore, the Levels of Disaggregation for these four Special Access Measures have been modified to include all of the following levels: DS0; DS1; DS3 (Non Optical); DS3 (Optical OCN); Below DS3 (DS0+DS1); DS3 and Above (DS3 + OCN).

Ninth, BellSouth is unable to annualize Failure Rate in Measure SA-9 based on the Calculation Methodology contained in this measure. Therefore, BellSouth has revised the Calculation Methodology to more accurately capture an annualized failure rate.

Tenth, in the Business Rules of Measure SA-11, BellSouth has deleted the reference to CPE/IXC as this reference conflicts with the Exclusion for CPE and IXC troubles.

Finally, BellSouth has revised the Glossary to include the BellSouth terms added to the Special Access measures and has created an Appendix B: Symbols used in Calculations.

BellSouth believes that the changes described above are consistent with the Commission's Orders and are required to ensure complete and uniform reporting of BellSouth's performance. Thank you for your attention to this matter.

Yours very truly,


Bennett L. Ross (PME)

BLR:nvd
Enclosures

cc: Mr. Leon Bowles
Mr. Patrick Reinhardt
Parties of Record

481325

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 depositing same in the United States Mail, with adequate postage thereon, addressed as follows:

Ms. Kristy R. Holley
Division Director
Consumers' Utility Counsel Division
47 Trinity Avenue, S.W.
4th Floor
Atlanta, GA 30334
kristy.holley@cuc.oca.state.ga.us

Daniel Walsh, Esquire
Assistant Attorney General
Department of Law – State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1300
dan.walsh@law.state.ga.us

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]
jcanis@kelleydrye.com
mhazzard@kelleydrye.com
aklein@kelleydrye.com
esoriano@kelleydrye.com

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]
chudak@fh2.com
rjackson@fh2.com

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]
diadelman@sablaw.com
cbjones@sablaw.com
hbriddle@sablaw.com

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]
fbs@sblaw.net
awl@sblaw.net

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

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

William R. Atkinson, Esquire
Sprint Communications Co.
3065 Cumberland Boulevard
Mailstop GAATLD0602
Atlanta, GA 30339
bill.atkinson@mail.sprint.com

Charles V. Gerkin, Jr., Esquire
Attorney at Law
Suite 610 – PMG 307
4135 LaVista Road
Tucker, GA 30085-5003
[Counsel for NewSouth, ICG Telecom]
charles.gerkin@attbi.com

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

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]
ngalloway@sglf-law.com
dfuchs@sglf-law.com

Walt Saprnov, Esquire
Gerry & Saprnov LLP
Three Ravinia Drive
Suite 1455
Atlanta, GA 30346-2117
[Counsel for Multitechnology, Powertel,
NEXTEL Communications, Access
Integrated]
info@gstelecomlaw.com

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]
anne.franklin@agg.com

Dulaney L. O’Roark III, Esquire
WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
de.oroark@wcom.com

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

This 21st day of February, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Bennett L. Ross
BENNETT L. ROSS (PME)

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

403347 (02/19/03)