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June 27, 2001

DELIVERED BY HAND

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244 Washington Street, S.W.
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RECEIVED

JUN 27 2001

**EXECUTIVE SECRETARY
G.P.S.C.**

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

Dear Mr. McAlister:

Enclosed herein please find an original and twenty (20) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Motion to Modify Service Quality Measurements in the above-referenced docket. I would appreciate your filing same and returning the five (5) 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: Parties of Record

393736/346162

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

Performance Measurements for)	Docket No. 7892-U
Telecommunications Interconnection,)	
Unbundling and Resale)	
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION TO MODIFY SERVICE QUALITY MEASUREMENTS**

I. INTRODUCTION

Pursuant to the Commission's January 12, 2001 Order, BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves that the Commission modify Performance Measure P-13 (LNP-Average Disconnect Timeliness Interval and Disconnect Timeliness Interval Distribution) in BellSouth's Service Quality Measurements ("SQM"). Such modification is necessary because the current measure: (1) does not accurately capture the customer's experience when the customer's telephone number is ported; and (2) includes activities in the porting process over which BellSouth has no control. The current Performance Measure P-13 represents a standard that cannot reasonably be met, which presumably was not the Commission's intent and which justifies the Commission granting relief at this time.¹

¹ Although the Commission will conduct an initial review of BellSouth's SQM and the corresponding enforcement plan sometime in August, the Commission also reserved "the right to modify the enforcement plan or SQM at any time it deems necessary" because the enforcement plan and SQM were "largely untested." January 12, 2001 Order at 24. The modification that BellSouth proposes here should not and cannot wait until the Commission's regularly scheduled review because Performance Measure P-13 is included in both the Tier I and Tier II submetrics under the Commission's enforcement plan. As explained in greater detail, unless Performance Measure P-13 is modified promptly, BellSouth will be required to pay millions of dollars in penalties, even though BellSouth is completing the number porting process in a timely fashion.

BellSouth proposes three alternatives to address the current situation until the Commission can review Performance Measure P-13 in full at a later date. First, the Commission could replace the existing Performance Measure P-13 with the "Average Time of Out of Service for LNP Conversion" measure from Texas, which was endorsed by the CLEC Coalition in this docket. A copy of this new measure is attached as Exhibit 1. Second, the Commission could modify the existing Performance Measure P-13 to more accurately the current number porting process and the minimize the impact of those porting activities over which BellSouth has no control. A copy of this revised measure is attached as Exhibit 2. Third, the Commission could require BellSouth to continue reporting local number portability ("LNP") disconnect timeliness under the existing Performance Measure P-13 and to begin reporting performance under either the proposed Texas measure (Exhibit 1) or the proposed revised measure (Exhibit 2), but to suspend any additional Tier I or Tier II penalty payments until further Commission review.

II. DISCUSSION

As the Commission is aware, LNP allows a customer to keep his or her telephone number when telephone service is transferred from one local exchange company to another. The number portability feature works by utilizing a centralized database that houses all ported numbers and provides proper routing of calls to and from these numbers. When an order involving LNP is being worked to port a telephone number from BellSouth to the CLEC, both BellSouth and the CLEC must take certain actions in order to enable the CLEC's new end user to make and receive calls using the ported number.

On a great majority of LNP orders, BellSouth creates what is referred to as a "trigger" in conjunction with the order. This trigger gives the end user customer the ability to make and receive calls from other customers who are served by the customer's host switch at the time of

the LNP activation. This ability is not dependent upon BellSouth working a disconnect order. In other words, when a trigger is involved, an end user customer can receive calls from other customers served by the same host switch before the disconnect order is ever worked.

On trigger orders, end user customers also can make and receive calls from customers not served by the same host switch before BellSouth works the disconnect order. This is because all the switches in the BellSouth network other than the host switch are updated via routing data that is delivered to each of BellSouth's Service Control Point ("SCP") databases. These routing messages are delivered by a system known as LSMS, which is operated by and under the control of BellSouth. Thus, the end user has the full ability to make and receive telephone calls on ported numbers involving a trigger as soon as the LSMS message is sent to all SCPs, even though BellSouth has not yet disconnected the customer from its translations in the BellSouth host switch.

However, as it currently exists, Performance Measure P-13 does not recognize the importance of triggers and their effect on the LNP process. Rather, the current measure calculates the end time of the LNP activity as the processing of the actual disconnect order in the host switch, even though, from a customer's perspective, this activity is totally meaningless. It is the activation of the LNP and the routing function accomplished by the LSMS that ultimately determines whether the end user is back in full service and is able to make and receive calls when a trigger is used in porting a telephone number.²

² The CLEC Coalition has recognized the importance of triggers on LNP orders. As CLEC Coalition witness Emch acknowledged in her pre-filed testimony, when a trigger has been set by BellSouth, intra-switch calls will complete for the end user customer before BellSouth has disconnected its switch translations. *See* Pre-Filed Rebuttal Testimony of Marsha Emch, Docket 7892-U, at 18 (June 27, 2000).

Technical limitations in some switches prevent triggers from being created for some classes of service, most of which involve more complex services. In these cases, all of the switches in BellSouth's network are updated via messages to the SCPs, except for the home switch. In the case of the home switch, the customer's ability to receive calls from other customers served by his or her home switch is dependent on the processing of the disconnect order after receipt of the number ported message from the NPAC database. However, the timeliness of the disconnect is not under BellSouth's control. For example, the CLEC may begin the porting process for a customer without notifying BellSouth or conduct the porting process after hours (which CLECs are doing with greater frequency today). In either case, the porting process may begin and end without BellSouth becoming aware of the need to complete the disconnect order in the home switch, making it impossible for BellSouth to meet the time frames established by this Commission.

In the proceedings in this docket, BellSouth proposed a measure for LNP disconnect timeliness that included a benchmark interval of 95% within 24 hours. In her rebuttal testimony, Ms. Emch on behalf of the CLEC Coalition proposed adoption of the Texas benchmark of 60 minutes, which is included in measure 100 of the Texas Plan. *See Pre-Filed Rebuttal Testimony of Marsha Emch, Docket 7892-U, at 18 (June 27, 2000).* Measure 100 of version 1.7 of the Texas Plan is attached hereto as Exhibit 3.

In its order of January 12, 2001, the Commission adopted a benchmark of 95% within 15 minutes, a requirement significantly more stringent than even the 60 minutes proposed by the CLEC Coalition. The end result is that: (1) for LNP orders involving a trigger, which is the vast majority of LNP orders being processed by BellSouth, the end time of the measure -- disconnecting the translations in the host switch -- has no bearing whatsoever on the end user's

service or his or her ability to make or receive calls once the CLEC activates LNP; and (2) for LNP orders not involving a trigger, BellSouth is being held to an impossible standard of 15 minutes, which BellSouth will rarely, if ever meet because of the CLEC's ability to begin and complete the porting process before BellSouth even becomes aware of the need to complete the disconnect order in the home switch.

The significance of the problem is only exacerbated by the fact that Performance Measure P-13 is a submetric under both Tier I and Tier II of the Commission's enforcement plan. For March and April 2001, BellSouth has paid CLECs in Georgia approximately \$2.3 million under Tier I for failure to meet the Commission's LNP disconnect timeliness benchmark alone. BellSouth estimates that in June it will pay upwards of \$5 million in Tier I and Tier II penalties on this measure alone if it is not modified immediately. These penalties would be paid on LNP orders where the CLEC's end user customer received the timely ability to send and receive calls or where the 15-minute LNP disconnect interval is under the CLEC's, and not BellSouth's control.

One means to remedy this situation would be to implement the Texas measurement 100, which was cited by Ms. Emch in her testimony, with the 60-minute benchmark advocated by the CLEC Coalition. A draft of this new measurement for inclusion in BellSouth's SQM is attached as Exhibit 1. Notably, as is the case in Texas, this measure does not focus on the disconnection from the host switch, but rather on the updates that are executed via the messages sent to the various SCPs in the network. This makes sense because, unlike disconnecting translations in the host switch, the update process via the SCPs is almost entirely within the incumbent's control and is not subject to significant delay by the CLECs.

Alternatively, the Commission could revise the existing LNP disconnect timeliness to address some, but certainly not all of the shortcomings identified above. In particular, the Commission could increase the benchmark to 95% within 24 hours and expand the current exclusions to eliminate from the applicable measure errors not caused by BellSouth, incomplete ports, and the after-hours porting of numbers by CLECs. A draft of this revised measurement for inclusion in BellSouth's SQM is attached as Exhibit 2.

Finally, the Commission could require that BellSouth continue to report LNP disconnect timeliness under the current Performance Measure P-13 as well as report performance using one of the alternatives set forth above. However, in the meantime, the Commission would suspend all Tier I and Tier II payments under Performance Measure P-13 until the Commission has the opportunity to examine more fully the problems associated with the existing measure. Because BellSouth would continue to report LNP disconnect performance, the Commission could order that payments be made retroactively once it decides how to address the problems described above. In this way, the Commission would have a more complete record upon which to make a decision about the measure and neither BellSouth nor the CLECs would be prejudiced in the interim.

Respectfully submitted, this 27th day of June, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



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EXHIBIT 1

P-13: LNP-Average Disconnects Timeliness Interval & Disconnect Timeliness Interval Distribution Modification Option 1

Definition

Disconnect Timeliness is defined as the interval between the time ESI Number Manager received the valid 'Number Ported' message from NPAC (signifying the CLEC 'Activate') until the time AIN/SMS acknowledges the LSMS broadcast.

Exclusions

- CLEC-caused errors.
- NPAC caused errors unless caused by BellSouth.

Business Rules

The Disconnect Timeliness Interval is determined for each telephone number ported during the reporting period. The Disconnect Timeliness Interval is the elapsed time from when BellSouth receives a valid 'Number Ported' message in ESI Number Manager (signifying the CLEC 'Activate') for each telephone number ported until the Provisioning event is successfully completed in BellSouth's network as reflected in BellSouth's LSMS. Calculate the total minutes of difference between the start time and end time in minutes for LNP activations during the reporting period.

Calculation

- $\Sigma (\text{LNP start time} - \text{LNP stop time}) \div \text{total number of LNP activations} \times 100$

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
- State, Region

SQM Disaggregation – Analog/Benchmark

SQM LEVEL of Disaggregation:	SQM Retail Analog/Benchmark:
<ul style="list-style-type: none"> • LNP 	<ul style="list-style-type: none"> • 95 % within 60 Minutes unless a different industry guideline is established that will override the benchmark referenced here.

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X
	Tier III	

Draft This is a working document. Not to be released. For measurement creation purposes only.

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none">LNP	<ul style="list-style-type: none">95% within 60 Minutes unless a different industry guideline is established that will override the benchmark referenced here.

EXHIBIT 2

P-13: LNP-Average Disconnects Timeliness Interval & Disconnect Timeliness Interval Distribution Modification Option 2

Definition

Disconnect Timeliness is defined as the interval between the time ESI Number Manager receives the valid 'Number Ported' message from NPAC (signifying the CLEC 'Activate') until the time the Disconnect is completed in the Central Office switch. This interval effectively measures BellSouth responsiveness by isolating it from impacts that are caused by CLEC related activities.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc.) where identifiable.
- CLEC-caused errors.
- NPAC-caused errors, unless caused by BellSouth.
- Incomplete Ports where only a subset of activate messages have been received compared with the LSR and create messages
- After-hours ports where the activate message is received after hours.

Business Rules

The Disconnect Timeliness Interval is determined for each telephone number ported associated with a disconnect service order processed on an LSR during the reporting period. The Disconnect Timeliness Interval is the elapsed time from when BellSouth receives a valid 'Number Ported' message in ESI Number Manager (signifying the CLEC 'Activate') for each telephone number on the service order is disconnected in the Central Office switch. The accumulated time for each reporting dimension is then divided by the total number of selected telephone numbers disconnected in the reporting period.

Calculation

Disconnect Timeliness Interval = (a - b)

- a = Completion Date and Time in Central Office switch for each number on disconnect order
- b = Valid 'Number Ported' message received date & time

Average Disconnect Timeliness Interval = (c / d)

- c = Sum of all Disconnect Timeliness Intervals
- d = Total Number of disconnected numbers completed in reporting period

Disconnect Timeliness Interval Distribution (for each interval) = (e / f) X 100

- e = Disconnected numbers completed in "X" days
- f = Total disconnect numbers completed in reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
 - State, Region

Draft This is a working document. Not to be released. For measurement creation purposes only.

Data Retained

<ul style="list-style-type: none"> • Order Number • Telephone Number / Circuit Number • Committed Due Date • Receipt Date / Time (ESI Number Manager) • Date/Time of Recent Change Notice 	<ul style="list-style-type: none"> • Not Applicable

SQM Disaggregation – Analog/Benchmark

SQM LEVEL of Disaggregation:	SQM Retail Analog/Benchmark:
<ul style="list-style-type: none"> • LNP 	<ul style="list-style-type: none"> • 95 % within 24 Hours

SEEM Measure

SEEM Measure		
Yes	Tier I	X
	Tier II	X
	Tier III	

EXHIBIT 3

Agreed to

100. Measurement:	
Average Time of Out of Service for LNP Conversions	
Definition:	
Average time to facilitate the activation request in SWBT's network.	
Exclusions:	
<ul style="list-style-type: none"> • CLEC-caused errors. • NPAC-caused errors unless caused by SWBT. • Stand Alone LNP Orders with more than 500 number activations 	
Business Rules:	
The Start time is the Receipt of the NPAC broadcast activation message in SWBT's LSMS. The End time is when the Provisioning event is successfully completed in SWBT's network as reflected in SWBT's LSMS. Calculate the total minutes of difference between the start time and end time in minutes for LNP activations during the reporting period.	
Levels of Disaggregation:	
<ul style="list-style-type: none"> • None 	
Calculation:	Report Structure:
$\frac{\Sigma(\text{LNP start time} - \text{LNP stop time})}{\# \text{ total LNP activations}}$	Reported by CLEC and all CLECs
Measurement Type:	
Tier 1 - None	
Tier 2 - None	
Benchmark:	
60 Minutes unless a different industry guideline is established that will override the benchmark referenced here. Critical z-value does not apply.	

CERTIFICATE OF SERVICE

Docket No. 7892-U

This is to certify that I have this day served a copy of the foregoing, upon all known parties of record, via U.S. Mail, addressed as follows:

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