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August 1, 2002

DELIVERED BY HAND

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

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's
Operations Support Systems; Docket 8354-U*

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

Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Notification Report for the September 2002 data month and a Preliminary Notification Report for the data month of October 2002. These proposed changes will be discussed at the August 7, 2002 industry conference call. Several of the items on the attached September Notification Report were not previously identified in the Preliminary September Notification Report filed on July 1, 2002. However, BellSouth feels that it is necessary to make these changes at this time to ensure BellSouth reports accurate data.

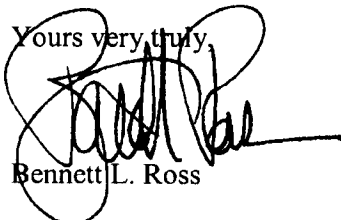
BellSouth would also like to bring to the Commission's attention an issue associated with the Preliminary Notification Report for the September 2002 data month that was filed on July 1, 2002. In that report BellSouth indicated that it was considering making a change with September 2002 data by which records going from RADS to the PMAP warehouse would be written to the monitoring table in 50,000 increments. BellSouth has since discovered that this change had already been made with June 2002 performance data. Although the change had no impact on performance measurement results, BellSouth regrets this error.

Enclosed please find an original and eighteen (18) copies, as well as an electronic version, of these Notification Reports, and I would appreciate your filing same and returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Mr. Reece McAlister
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Thank you for your assistance in this regard.

Yours very truly,

A handwritten signature in black ink, appearing to read "Bennett L. Ross", written over the typed name below it.

Bennett L. Ross

BLR:nvd
Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)
Parties of Record (w/enclosure) (via electronic mail)

456944

SEPTEMBER 2002 DATA NOTIFICATION

BellSouth proposes to make the following changes, described below, to generate results for the September 2002 data month, preliminary results for which will be posted on October 21, 2002, with final results being posted on October 31, 2002. BellSouth provides this notice consistent with the Georgia Public Service Commission's July 19, 2002 Order, which requires that, on the first business day of the month preceding the data month for which BellSouth proposes to make any change to method by which its performance data is calculated, BellSouth must provide written notice of any such proposed changes as well as provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following month. The "affected measures" described in the notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, and all impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

Ordering Measurements

- (1) *Affected Measures:* All ordering measures and P-10

Description of Change: With the implementation of Release 10.6, which is currently scheduled for August 27, 2002, BellSouth proposes to implement changes to PMAP code to extract data necessary to calculate performance results consistent with the SQM. This proposed change was Item (1) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1181 & RQ1194)

Impact of Change: None

- (2) *Affected Measures:* O-8 & O-9

Description of Change: If the outbound timestamp for an Local Service Request ("LSR") for Local Number Portability ("LNP") is missing in EDI or TAG, PMAP captures the timestamp from the LNP Gateway. However, the field that PMAP currently uses contains the outbound timestamp of the last response for the LSR, which is not necessarily the transaction for which duration should be calculated. BellSouth proposes to change the code so that PMAP will select the appropriate LNP Gateway timestamp in cases when the outbound timestamps are missing from EDI or TAG. This proposed change was Item (4) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1224)

Impact of Change: In March 2002 less than 1% of the LNP LSRs were missing outbound timestamps and only a subset of those are affected by this change. Therefore, the impact on measurement results is expected to be minimal.

- (3) *Affected Measures:* O-8, O-9, O-14 and O-15

Description of Change: As part of the data reconciliation effort recently conducted by BellSouth with AT&T, BellSouth determined that an LNP LSR is reported as Partially Mechanized if it is *viewed* by a service representative in the Local Carrier Service Center ("LCSC"), even though the LSR is not manually processed by the service representative. In order to address AT&T's concerns, BellSouth proposes to make a coding change that will cause an LSR to be classified as Partially Mechanized only if it is *processed* by a Service Representative in the LCSC. Although this change was not previously identified, it is associated with Item (4) on the Preliminary September 2002 Data Notification filed on July 1, 2002 (RQ1224), and therefore is being worked in conjunction with this item.

Impact of Change: Fully Mechanized performance is not expected to change significantly, although Partially Mechanized performance is expected to decline somewhat. Approximately 19% of the LNP LSRs categorized as Partially Mechanized in March 2002 data were viewed, but not processed by a Service Representative in the LCSC.

- (4) *Affected Measures:* O-1 & O-2

Description of Change: The BellSouth TAG Server is located in Charlotte, NC, which is in the Eastern Time zone. Currently, in order to ensure uniformity, BellSouth mechanically subtracts one hour from the Acknowledgement Measurements to coordinate with other systems located in the Central Time zone. BellSouth is eliminating this mechanized adjustment by implementing a coding change to convert the TAG time stamp to Central time. This proposed change was Item (5) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1373)

Impact of Change: None

- (5) *Affected Measures:* O-7, O-8, O-9 & O-11

Description of Change: BellSouth has certain retail accounts (primarily medium to large businesses) that have been assigned their own OCN /ACNA because they have switching equipment on premises. Currently, because of the presence of a non-BellSouth OCN or ACNA, ordering data related to these accounts can be included in the CLEC aggregate results, although this situation is not likely to occur because BellSouth retail customers do not submit LSRs. However, BellSouth will implement a coding change to ensure that these accounts are not included in CLEC aggregate results. This proposed change was Item (6) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ891)

Impact of Change: In March 2002 data, there were no LSRs for the OCNs/ACNAs that would be excluded by this coding change. Therefore, this change should have minimal, if any impact on reported results.

(6) *Affected Measures:* O-8 & O-9

Description of Change: When an LSR receives multiple Firm Order Confirmations (“FOCs”), duration is calculated only on the first FOC. Currently, if multiple FOCs are returned in multiple months, the LSR is included in FOC Timeliness for each month, and the same duration is reported in each month since the measurement is calculated using only the first FOC. BellSouth proposes to implement a coding change so that the LSR will be reported only in the month in which the first FOC is sent. This same change applies to Reject Interval. This proposed change was Item (8) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1063)

Impact of Change: Less than 1% of the LSRs included in the March 2002 FOC Timeliness report and less than 1% of those included in the March 2002 Reject Interval report were also included in the respective February reports. There are no characteristics that indicate the LSRs impacted by this change are different from the average LSR, so there will be negligible impact on the measurement results.

(7) *Affected Measures:* O-10

Description of Change: As part of the third-party test in Florida, KPMG Consulting Inc. (“KCI”) issued an observation in connection with its inability to replicate the April 2002 “Ordering: Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time Manual” SQM Report. (Observation 213). According to KCI, the data did not reflect the interval label on the SQM Report. For example, an interval bucket labeled “> 3 - <= 5 Days” should contain data where the Service Inquiry with LSR Firm Order Confirmation (FOC) Response Interval duration is greater than three days and less than or equal to five days. However, according to KCI, the interval bucket actually contained data when the duration was greater than or equal to three days and less than five days. BellSouth is implementing a change to ensure consistency between the reported interval data and the interval labels on the SQM Report. The change is being made in response to concerns expressed by KCI. (RQ1700)

Impact of Change: The change will have no impact on overall performance results, as it affects only the number of orders assigned to various interval categories.

Provisioning Measurements

- (8) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, P-10, P-12 & P-14.

Description of Change: As part of the third-party test in Florida, KCI recently issued second amended exception 151 which is related to this change request. In validation efforts by BellSouth it became apparent that the classification of orders with less than 10 lines and greater than 10 lines was inaccurate for purposes of these provisioning measures. BellSouth proposes to make a coding change to utilize the SPO or SWO FIDs from the orders, which will allow BellSouth to more accurately identify, capture, and record the number of lines for purposes of these measures. This change is being made in response to concerns expressed by KCI. (RQ1567)

Impact of Change: BellSouth is unable to quantify the impact for each of the affected measures, but expects it to be minimal, as a small percentage of orders are for greater than 10 lines.

- (9) *Affected Measures:* P-9

Description of Change: As part of the third-party test in Georgia, KCI has issued an exception in connection with the % Provisioning Troubles Within 30 Days of Service Order Completion measure. (Exception 152). In responding to this exception, BellSouth determined that service orders that had a trouble within five days are being excluded from the denominator in calculating the results for this measure, even though those same troubles are being included in the numerator. BellSouth is making a change to include service orders that had a trouble within five days in the denominator for purposes of calculating this measure. The change is being made in response to concerns expressed by KCI. (RQ1703)

Impact of Change: For all states other than Louisiana (which requires that BellSouth calculate performance based on the % Provisioning Troubles Within 5 Days of Service Order Completion), BellSouth estimates that this change will result in a less than 0.2% improvement in reported results.

- (10) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, & P-9.

Description of Change: BellSouth recently uncovered that, in connection with the implementation of PMAP 4.0, the retail analog for ADSL is being undercounted in Kentucky and Florida. Specifically, Billing Account Numbers ("BANs") are hard coded, and two BANs associated with retail ADSL were incorrectly specified in the code. BellSouth is proposing a coding change to correct this error. Although this change was not previously identified, BellSouth only

recently determined the need to make this change, and, because of the potential impact in Kentucky and Florida, BellSouth believes that the change should be made effective with September data rather than waiting an additional data month. (RQ1647)

Impact of Change: Although unable to quantify the precise impact of the change for each of the affected measures, BellSouth has determined that approximately 700-1400 orders have been erroneously omitted from the retail analog data in Kentucky since April 2002.

(11) *Affected Measures:* P-8

Description of Change: BellSouth has determined that, in connection with the implementation of PMAP 4.0, all circuits were being included in both the numerator and denominator for purposes of calculating results for the Cooperative Acceptance Testing measure, which caused BellSouth's performance to be 100%. BellSouth proposes to correct the code to count in the numerator only those circuits that have successfully passed cooperative acceptance testing, as required by the SQM. Although this change was not previously identified, BellSouth believes that, because of the importance of DSL issues at the federal and state level, this change should be made effective with September data rather than waiting an additional data month. (RQ1571)

Impact of Change: Based on historical data, BellSouth estimates that this change will reduce BellSouth's performance by approximately 1 percentage point.

Maintenance & Repair Measurements

(12) *Affected Measures:* MR-2

Description of Change: Currently, in capturing line count records for PBX sub-metrics for this measure, BellSouth groups USOCs into General Class of Service categories. Some USOCs apply to both Business and PBX categories and are currently defaulting to Business. Because this tends to understate the line count records for PBX and Centrex, BellSouth proposes to implement a change by which the "max gen class" code would be utilized so that all PBX and Centrex USOCs are included in the line count records for PBX and Centrex sub-metrics. This proposed change as it relates to the PBX sub-metrics was Item (10) on the Preliminary September 2002 Data Notification filed on July 1, 2002, although BellSouth has since determined that the same change should be made for Centrex. (RQ1319)

Impact of Change: BellSouth is unable to quantify the impact of this change but expects it to be minimal.

(13) *Affected Measures:* MR-2

Description of Change: BellSouth has determined that trouble reports associated with two product identifications – 5011 and 5021 – are not being captured in the volumes for BellSouth’s retail customer trouble reports for the Design (Specials) sub-metrics. This omission has caused BellSouth to understate the retail customer trouble report rate for these resale sub-metrics. To address this problem, BellSouth proposes to make a change to include product identifications 5011 and 5021 in the retail troubles for the Design (Specials) sub-metrics. Although this change was not previously identified, BellSouth believes that the potential impact warrants making the change effective with September data rather than waiting an additional data month. (RQ1193)

Impact of Change: BellSouth estimates that this change will reduce BellSouth retail results for the Design (Specials) sub-metrics by approximately 2 percentage points.

(14) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: BellSouth recently discovered an error associated with the reporting of troubles associated with CLEC Digital Loops for purposes of these maintenance and repair measures as reflected in the MSS. Specifically, although line counts and troubles associated with CLEC Digital Loops are captured on the SQM maintenance and repair reports, this same information was inadvertently omitted from the UNE Other Design results as reflected on the MSS. BellSouth proposes to make a change to correct this omission. Although not previously identified, BellSouth only recently discovered the need to make this change. (RQ1707)

Impact of Change: BellSouth has not been able to quantify the impact of this change for all of the affected measures, but expects it to be minimal.

(15) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: Currently some records processing through PMAP are missing wire center identifications, which cause them to be excluded from the measures. BellSouth is implementing a change to create a wire/frame table to be used as an additional means to identify valid wire center information, which would reduce the number of records in error due to incorrect wire center identifications. This proposed change was Item (9) on the Preliminary September 2002 Data Notification filed on July 1, 2002. (RQ1176)

Impact of Change: BellSouth expects the impact of this change to be minimal, as less than 300 records would have been affected by this change in the April data month.

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PRELIMINARY OCTOBER 2002 DATA NOTIFICATION

BellSouth is considering make the following changes, described below, to generate results for the October 2002 data month, preliminary results for which will be posted on November 21, 2002, with final results being posted on December 2, 2002. BellSouth provides this notice consistent with the Georgia Public Service Commission's July 19, 2002 Order, which requires that, on the first business day of the month preceding the data month for which BellSouth proposes to make any change to method by which its performance data is calculated, BellSouth must provide written notice of any such proposed changes as well as provide written notice of any known changes BellSouth is considering making to the method of calculating performance data for the following month. The "affected measures" described in the notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, and all impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

Ordering Measurements

- (1) *Affected Measures:* OSS-2

Description of Change: Beginning with May 2002 data, the results from the ATLAS and COFFI systems were inadvertently reported separately. Because the SQM requires that ATLAS and COFFI system availability results be combined, BellSouth proposes to combine the reports consistent with the SQM. (RQ1669)

Impact of Change: None, as the results are the same for both systems.

- (2) *Affected Measures:* O-8, O-9, O-14 & O-15

Description of Change: As previously identified in its June 2002 Data Notification, BellSouth proposed to make coding changes to capture an additional identifier for Local Service Requests ("LSRs") submitted via EDI that was implemented in connection with Release 10.5. Similar changes need to be made to capture this identifier for LSRs submitted via TAG and processed through LEO or the LNP Gateway as well as to ensure that PMAP recognizes and uses these additional identifiers in calculating performance results. (RQ1141 & RQ1627)

Impact of Change: Less than 1.0%

- (3) *Affected Measures:* All Ordering Measures.

Description of Change: Operating Company Number (OCN) 4384 was assigned to KPMG Consulting, Inc. ("KCI") for purposes of the third party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN,

making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in ordering measurements on a going-forward basis. (RQ0948)

Impact of Change: None

- (4) *Affected Measures:* O-11

Description of Change: Currently, in calculating the non-trunk data associated with this measure, BellSouth takes a "snapshot" generally on the 2nd day of the month. To allow additional time to appropriately report completeness for Local Service Requests ("LSRs") received late in one month for which a FOC or Reject is sent early the following month, BellSouth proposes that this "snapshot" be taken no earlier than the 4th day of the month. (RQ1644)

Impact of Change: BellSouth is unable to quantify the impact of this change, but expects it to be minimal.

Affected Measures: PO-1

Description of Change: Currently, the MSS data for Manual Loop Makeup Response time is being measured against a benchmark of 3 minutes. This data should be measured against a benchmark of 3 Business Days (RQ1631)

Impact of Change: An improvement in BellSouth's performance.

Provisioning Measurements

- (5) *Affected Measures:* P-1, P-2, P-3, P-4, P-5, P-6, P-9, P-10, P-12 & P-14

Description of Change: Consistent with the SQM, administrative orders should be excluded from these measures. However, BellSouth has determined that a type of administrative order associated with administrative changes to a large volume of existing customer accounts is not being excluded. This type of administrative order, which is called a MECHSO order, is typically necessary to change USOCs or FIDs and is commonly issued as an automatic completion (ACY), both for BellSouth retail and wholesale customers. An example of a MECHSO order is when a state public service commission mandates a change in the class of service in a calling area to include an entire county. BellSouth proposes to make a change to exclude MECHSO orders from these provisioning measures as required by the SQM. (RQ0606)

Impact of Change: BellSouth is unable to quantify the impact for each of the affected measures, but expects it to be minimal, as the base of orders should be reduced by less than 1%.

- (6) *Affected Measures:* All Provisioning Measures.

Description of Change: OCN 4384 was assigned to KCI for purposes of the third-party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN, making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in provisioning measurements on a going-forward basis. (RQ0948)

Impact of Change: None

- (7) *Affected Measures:* P-3, P-4, P-5, P-6, P-9 & P-10

Description of Change: BellSouth will be making a coding change to exclude orders with a miscellaneous account code and a class of service code of ADF, that are being issued to establish billing on resale and retail customers for DSL and satellite TV. These orders currently are being captured in the Retail and Resale Business as well as the Retail DSL categories, even though the orders are for billing and administrative purposes and should be excluded from these measures consistent with the SQM. (RQ831)

Impact of Change: Approximately 23% of BellSouth retail orders completed in June 2002 in Georgia would be affected by this change and would have been excluded from the affected measures. This change would have a minimal impact on Resale results, as there were only approximately 10 such orders in June 2002.

- (8) *Affected Measures:* P-4

Description of Change: BellSouth is proposing to make coding changes to use the issue date on the Service Order as the initial timestamp for the Order Completion Interval (OCI) measure, rather than the application date. Although the issue date and the application date are generally the same, in some cases when the Service Order is modified the application date is revised, even though the same Service Order is being used to provision the service. For example, if a customer changes the due date after the Service Order is issued, the application date may be changed to when the new due date is entered on the order, although the issue date would not change. Because the date for purposes of calculating OCI should not vary depending upon whether a Service Order is modified, BellSouth believes using the issue date is more appropriate. (RQ0717)

Impact of Change: BellSouth estimates that this change will impact less than 1% of the Service Orders for both wholesale and retail.

- (9) *Affected Measures:* P-5

Description of Change: BellSouth is proposing a change to correct the beginning timestamps for purposes of calculating Average Completion Notice Interval (ACNI) for Design orders. This change would correct the problem that is currently being experienced by which the ACNI interval is inflated because it is measured from the first circuit location rather than the last one when the entire work order is completed. This change is consistent with the SQM, which requires that the ACNI interval measure the "elapsed time between the BellSouth reported completion of work and the issuance of a valid completion notice to the CLEC." (RQ759)

Impact of Change: BellSouth estimates that this change will cause a significant reduction in the ACNI intervals for both CLECs and BellSouth, although BellSouth retail results will experience a greater reduction because BellSouth tends to have more orders with more circuit locations. Most notices are sent within the hour of completion and the current Design intervals are in the hundreds of hours (for example, in April 2002, the Georgia Design Dispatch ACNI Mechanized interval was 304 hours, compared to 41 hours for the CLECs).

- (10) *Affected Measures:* P-7A

Description of Change: BellSouth proposes to simplify the replication of data for this measure by pre-classifying data based on "early", "on-time", and "late". This will aid in replication and validation of data and simply reflects these classifications earlier in the process. No change in coding is involved in producing the results. (RQ1570)

Impact of Change: None.

Maintenance & Repair Measurements

- (11) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: BellSouth is considering implementing a coding change that would identify WFA records in PMAP that have a mismatch between a company code and product code. This would allow BellSouth to assign an error code for tracking and analysis purposes when, for example, a BellSouth company code indicates a UNE product. This change was previously addressed in the Preliminary September Data notification filed on July 1, 2002. (RQ1140)

Impact of Change: None

- (12) *Affected Measures:* MR-1, MR-2, MR-3, MR-4, MR-5, MR-6 & MR-7

Description of Change: Currently ADSL products are identified using a hard coded work around product ID routine. BellSouth is considering a change that will begin using the standard product ID routine as used for other products. (RQ1261)

Impact of Change: None

- (13) *Affected Measures:* All Maintenance and Repair Measures

Description of Change: OCN 4384 was assigned to KCI for purposes of the third-party test and thus was excluded from CLEC aggregate results. KCI has since released this OCN, making it assignable to a CLEC. BellSouth will need to make a coding change so that OCN 4384 is included in maintenance and repair measurements on a going-forward basis. (RQ0948)

Impact of Change: None

- (14) *Affected Measures:* M&R 2

Description of Change: Currently some line count records processing through PMAP contain incorrect wire center identifications, which cause records to fall into an error bucket that is excluded from the measures. This impacts UNE 2 wire analog loop non-design lines. BellSouth is implementing a change to utilize the wire/frame table, initially described in the Preliminary September Data Notification filed on July 1, 2002, to be used as an additional means to identify valid wire center information, which would reduce the number of records falling into error bucket due to incorrect wire center identifications. (RQ1611)

Impact of Change: BellSouth estimates that this change will cause the denominator for CLEC data for this measure to increase which will improve the customer trouble report rate performance for CLEC's.