

August 9, 2002

Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: Investigation Concerning the Propriety of InterLATA Services by
BellSouth Telecommunications, Inc. Pursuant to the Telecommunications
Act of 1996
PSC 2001-105

Dear Mr. Dorman;

Recently, the Florida Public Service Commission adopted 6 additional change control measures. These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization¹

Copies of the SQM pages for these measures are attached to this letter.

As the Commission is aware, several state commissions and the FCC have focused attention on BellSouth's CCP process. Consequently, BellSouth will report

¹ Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Section 4, Part 2, Types 2-5 Process Flow, Step 3.

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regional data collected in accordance with these measures in Kentucky in conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in Kentucky pursuant to the BellSouth Service Quality Measurement Plan. Kentucky Tariff 10C, Attachment 1 will be updated to include these changes by August 15, 2002.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that this Commission amend the performance plan to incorporate these six measures and the associated penalties. Please let me know if you have any questions about the information contained in this letter.

One paper copy and a CD-ROM of the filing are provided to the Commission. A CD is provided to all parties of record.

Sincerely,

Creighton E. Mershon, Sr.

Enclosures

cc: Parties of Record

458321

CERTIFICATION

I hereby certify that the electronic version of this filing made with the Commission this 9th day of August 2002 is a true and accurate copy of the documents filed herewith in paper form, that the electronic version of the filing has been transmitted to the Commission and that the Commission and parties of record have been notified by electronic mail that the electronic version of this document has been transmitted to the Commission.

I also certify that a copy of the foregoing was served on the individuals on the Service List by mailing a CD-ROM containing the filing, this 9th day of August 2002.

Creighton E. Mershon, Sr.

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