

BellSouth Telecommunications, Inc.  
Kentucky PSC Case No. 2001-105  
Informal Request No. 1

REQUEST: Please provide a comparison of the SQM plan that the GPSC ordered with the plan filed in Kentucky. Also, please respond to the allegations of AT&T witnesses Bursh and Bradbury that BellSouth's SQM in Georgia is not compliant with the Georgia Order.

RESPONSE: The plan filed as AJV-1 in Al Varner's direct testimony is identical to the plan ordered in Georgia and filed with the FCC on October 2, 2001. As stated in the September 25 transcript of the hearing on pages 11 and 12, AVJ-1 is a copy of the ordered Georgia SQM.

The response to the allegations of Bradbury and Bursh that BellSouth did not comply with the Georgia Order is found in Mr. Varner's Rebuttal Testimony filed July 30, 2001, pages 64 and 65, and pages 85 through 92, attached.

*Page 64 – Bradbury claims that BellSouth unilaterally excluded non-business hours from reject and FOC timeliness.*

- The May 2000 SQM filed with the GPSC made clear that LSRs received outside of non-business hours would be excluded from the Reject and FOC timeliness measures. The GPSC adopted Bellsouth's measures and did not alter the non-business hours exclusion in its January 12, 2001 Order.

*Page 85 – Bursh claims BellSouth's proposed interim SQM in Kentucky is not compliant with the Georgia Order.*

- BellSouth has made no modification in the calculations of any measures, only wording changes to further clarify the SQM describing the measurements. (page 86)

- It makes no sense to include non-dispatch orders in a measurement that deals almost exclusively with order that result in a "pending facilities" status due to lack of facilities. (page 88)

- BellSouth has always excluded rural orders involving "special construction" from the Held Order Interval measures. BellSouth only added wording to the SQM which stated this obviously appropriate practice. (page 88)

- Ms. Bursh's discussion of an exclusion of non-mechanized orders from the FOC and Reject Response Completeness measure fails to mention that data for non-mechanized orders is reported in the FOC Timeliness and Reject Completeness measures. (page 90)
- Expedite orders should not be included in the Percent NXXs and LRNs Loaded by the LERG Effective Date since they are, by their very nature, an attempt by BellSouth to meet a date that is far shorter than the normal process. It would be incorrect to include expedited orders in a measurement designed to evaluate BellSouth's performance under normal operating conditions. (page 92)