

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

October 16, 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 No. 8354-U*

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

Dear Mr. McAlister:

At the Data Notification workshop held on October 7, 2002, BellSouth Telecommunications, Inc. ("BellSouth") was asked to provide information in response to certain questions from workshop participants. Outlined below are BellSouth's responses to these questions:

November Data Notification / Maintenance and Repair Measurements / Item 15 – Explain when the new data feeds required in connection with the replacement of LMOS will be used in Florida and other BellSouth states.

Response – BellSouth is seeking approval to implement the necessary coding work in PMAP in preparation for utilizing new data feeds that will be required with the replacement of LMOS next year. Currently, Alabama is tentatively scheduled for implementation in March 2003, and the new data feeds will be used in other states as resources and scheduling permits. No firm schedule has been established for states other than Alabama, although BellSouth will notify the Commission once schedules for the other states have been established.

November Data Notification / Third-Party Testing / Item 24 – Explain whether the 7,247 subscriber late (“SL”) missed appointment codes are being counted as end-user misses or company misses or both and provide a breakdown of these codes between BellSouth and the CLECs.

Response – The SL codes are recorded as end-user misses, and of the 7,247 orders with SL missed appointment codes in Georgia in May 2002, 6,026 were attributed to BellSouth end users and 1,221 were for CLEC end users.

November Data Notification / Third-Party Testing / Item 28 – Explain what other orders would be necessary to migrate the customer’s service when a C order is issued to disconnect BellSouth lines in a partial port situation.

Response – When a portion of a customer’s lines are disconnected, a C order is used to disconnect service, whether the customer is being served by BellSouth or a CLEC. If these disconnected lines are being transferred to another carrier, there would be a second C or an N order to re-establish the service under the new carrier’s account, and this C or N order is being captured and will continue to be captured in BellSouth’s performance data. This proposed change would exclude only C orders that disconnect service with no inward activity or change activity requiring work on the order.

November Data Notification / Third-Party Testing / Item 29 – Clarify the change being proposed and the impact of the proposed change.

Response – This item addresses KCI Georgia Exception 142 for “Provisioning: Jeopardy Interval and Percent Jeopardy Non-Mechanized” SQM Report and Georgia Exception 155 for “Provisioning: Average Jeopardy Interval and Percentage of Orders Given Jeopardy Notices” SQM Report. When the jeopardy interval measure was fixed in February and March 2002, two aspects of the fix were not implemented for the SQM Reports posted on the web. These two aspects were: (i) exclusion of orders when the service order is issued less than 48 hours before the commitment date; and (ii) exclusion of orders when the jeopardy condition was identified on the commitment date. With this change, the performance results reflected in the SQM Reports posted on the web will be calculated in the same manner as the MSS. The impact of this change will cause more records to be excluded in the original jeopardy notice interval measure. In addition, durations are expected to increase.

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Another issue that was discussed during the workshop, although not directly related to BellSouth's November Data Notification or December Preliminary Data Notification Report, concerned the ability of CLECs to obtain records that had been excluded from the calculation of performance results. This issue also was the subject of a series of e-mails exchanged between the parties last week. Because the purpose of providing raw data is to enable the CLECs to replicate BellSouth's performance calculations, it is not necessary to provide as part of raw data records that have been excluded, since excluded records do not factor into the calculation of performance results. However, BellSouth will provide to CLECs an "Other Supporting Data File," which will contain excluded records and so-called "errored" records. This file should be available during the first quarter of 2003.

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

Yours very truly,



Bennett L. Ross

BLR:nvd

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

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