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November 2, 2001

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:

The enclosed documents are filed pursuant to this Commission's Order in Case No. 2001-105 dated October 19, 2001. Consistent with this Order, BellSouth has attached the following:

Exhibit A is the Competitive Local Exchange Carrier Tariff. This Attachment outlines the application of the tariff. Attachments 1 and 2 contain the provisions of this tariff filing.

- Attachment 1 of the tariff is BellSouth's Service Quality Measurements (SQM) adopted by this Commission. This is the same SQM as set forth by the Georgia Public Service Commission in Docket 7892-U, dated January 12, 2001.
- Attachment 2 of the tariff is the SEEM plan currently existing in Georgia and ordered by this Commission. The LNP – Average Disconnect Timeliness Interval measure is not shown as a SEEM measure, as specified in this Commission's Order referenced herein. BellSouth will measure this LNP metric and hold any associated penalties in abeyance until such time as this Commission completes a review of this measure and the alternative LNP measures included in Exhibit B.

While the attached SQM, Exhibit A, Attachment 1, is based on the Georgia SQM, as set forth in the aforementioned Kentucky Order, there are certain performance standards in the Georgia SQM that differ from performance standards currently reported in Kentucky. In particular, these differences are associated with the Directory Assistance/ Operator Services measures and certain Collocation measures.

The Kentucky Directory Assistance/ Operator Services performance standards are based on an existing Kentucky regulation requiring an average speed of answering time not to exceed eight (8) seconds. While the SQM includes a metric for average time to answer operator assisted calls, it also includes a measure for the Percent Answered within "X" Seconds. In order to compute the percent answered within "X" seconds, BellSouth uses the "Bellcore" conversion tables from Telcordia. BellSouth inputs various parameters reflecting the conditions of the call center (number of operators, average work time, etc.) and the average speed to answer into the Bellcore program. The tables convert the average speed to answer into a percent answered within "X" seconds, adjusting for abandoned calls that enter the queue. This process produced the benchmarks shown as "Kentucky Benchmark." The Kentucky benchmarks are compared to the Georgia benchmarks in the table below.

<b>Measure</b>	<b>Georgia Benchmark</b>	<b>Kentucky Benchmark</b>
Speed of Answer Performance/ Percent Answered within "X" Seconds – Toll	10 seconds	30 seconds
Speed of Answer Performance/ Percent Answered within "X" Seconds – DA	12 seconds	20 seconds

There are also differences in the Collocation intervals currently used in Kentucky and the Georgia Collocation intervals. Current Kentucky Collocation intervals are reported based on the FCC guidelines that generally apply where no state order has been issued. The charts below show the Kentucky versus Georgia Collocation intervals.

<b>Collocation Average Response Time</b>		
<b>Type of Arrangement Requested</b>	<b>Georgia Benchmarks</b>	<b>Kentucky Benchmarks</b>
Virtual	20 Calendar Days	20 Calendar Days
Physical Caged	30 Calendar Days	23 Business Days
Physical Cageless	30 Calendar Days	23 Business Days
Virtual Augments for Line Sharing or Line Splitting	-	23 Business Days

<b>Collocation Average Arrangement Time</b>	
<b>Georgia Benchmarks</b>	<b>Kentucky Benchmarks</b>
Virtual – 50 Calendar Days (Ordinary)	Virtual – 50 Calendar Days (Ordinary)
Virtual – 75 Calendar Days (Extraordinary)	Virtual – 75 Calendar Days (Extraordinary)
Physical Caged – 90 Calendar Days	Physical Caged – 76 Business Days (Ordinary)

-	Physical Caged – 91 Business Days (Extraordinary)
Physical Cageless – 60 Calendar Days (Ordinary)	Physical Cageless – 76 Business Days (Ordinary)
Physical Cageless – 90 Calendar Days (Extraordinary)	Physical Cageless – 91 Business Days (Extraordinary)
-	Virtual Augments for Line Sharing or Line Splitting – 45 Business Days

The attached SQM reflects the Georgia standards for the DA/OS and Collocation measures identified, as required by the above referenced Order. However, enclosed as Exhibit B are an alternative set of pages for the affected measures. Should the Commission determine that their previous decisions regarding answer time and collocation provisioning intervals should be preserved, the pages in Exhibit B can simply be substituted for the relevant pages in Exhibit A.

Exhibit C contains the new LNP measurements that BellSouth proposes that this Commission adopt in lieu of the LNP-Average Disconnect Timeliness Interval measurement. These are the LNP provisioning measures currently reported in Georgia. While BellSouth is not proposing that the Commission adopt measure P-13 (LNP-Average Disconnect Timeliness Interval) as a permanent measure, this measure is included to reflect the change in the SQM Definition and Business Rules recently adopted by the Georgia Commission. Measurement P13B is equivalent to Texas Measure 97 and Measurement P13C is equivalent to Texas Measure 101 as required by the Commission's Order.

The SEEM plan, Exhibit A, Attachment 2, includes all of the components of the enforcement plan currently in effect in Georgia. More specifically, the Georgia SEEM plan contains the following components that were not in the SEEM originally proposed in Kentucky:

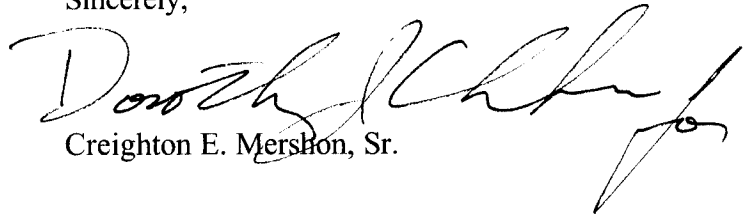
- Market Penetration adjustment – additional Tier 2 penalties for failures where CLECs order low volumes of advanced and nascent services.
- Tier III mechanism - the voluntary suspension of additional marketing and sales of long distance services triggered by excessive repeat failures in certain measures.
- An absolute cap on Tier 1 and Tier 2 penalties of 44% of BellSouth's Net Revenue for the State of Kentucky is included.
- Several measures are included in Tier 1 that were not originally proposed in Kentucky.
  1. Loop Makeup Response Time – Manual
  2. Loop Makeup Response Time – Electronic
  3. Acknowledgement Message Timeliness
  4. Acknowledgement Message Completeness

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5. Percent Flow-Through Service Requests (Detail)
6. Reject Interval
7. Firm Order Confirmation Timeliness
8. Cooperative Acceptance Testing - % of xDSL Loops Tested
9. Invoice Accuracy
10. Mean Time to Deliver Invoices
11. Usage Data Delivery Accuracy

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

Sincerely,



Creighton E. Mershon, Sr.

Enclosures

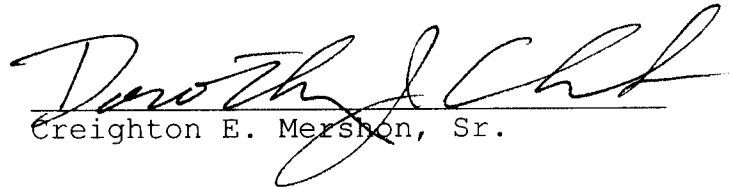
cc: Parties of Record

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**CERTIFICATION**

I hereby certify that the electronic version of this filing made with the Commission this 2nd day of November 2001 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 2nd day of November 2001.

  
Creighton E. Mershon, Sr.

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