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December 2, 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 January 2003 data month and a Preliminary Notification Report for the data month of February 2003. These proposed changes will be discussed at the December 6, 2002 industry conference call.

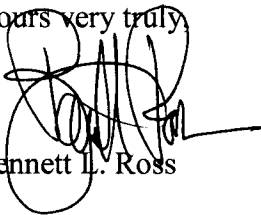
Enclosed for filing please find an original and eighteen (18) copies, as well as an electronic version, of these Notification Reports. I would appreciate your returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

There is one additional matter that BellSouth would like to bring to the attention of the Commission and the parties. In its October 2002 Notification Report filed on September 2, 2002, BellSouth provided notice of a change to address Georgia Exceptions 159 and 160 and Florida Exceptions 178 and 179. This change, which was Item No 15 on the October 2002 Notification, was made to ensure that records which had spaces included in the OCN were included in the data for Measure O-1 (Acknowledgement Message Timeliness) and Measure O-2 (Acknowledgement Message Completeness). However, BellSouth has since discovered that this change was not implemented correctly, and BellSouth will be making additional coding changes with November 2002 data to address this problem.

Mr. Reece McAlister
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Thank you for your attention to this matter, and please let me know if you have any questions or need additional information.

Yours very truly,

A handwritten signature in black ink, appearing to be "Bennett L. Ross", written over the text "Yours very truly,". The signature is stylized and somewhat illegible.

Bennett L. Ross

BLR:nvd

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

471205/471076/471078

PROPOSED JANUARY 2003 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the January 2002 data month. Results for the January 2002 data month will be posted as follows:

Preliminary results February 21, 2003
Final results February 28, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* All Ordering Measures

Description of Change: In anticipation of Encore Releases 11.0 and 11.1 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported. These proposed changes were Item (1) on the Proposed December 2002 Data Notification and Item (1) on the Preliminary January 2003 Data Notification filed on November 1, 2002. Both releases are reflected on this report due to the delay in Release 11.0 implementation.

Impact of Change: None.

Provisioning Measurements

- (2) *Affected Measures:* P-3, P-5, P-6, P-9, & P-10.

Description of Change: The SQM requires exclusion of all disconnects. Currently, C orders with disconnect entries are not being excluded. This includes partial port-outs (partial disconnect of service being ported out on separate order). This change will exclude all C orders with no inward activity or change activity

requiring work on the order. This proposed change effects the same changes to these provisioning measures that were made to Measure P-4, which was implemented as Item (28) on the Proposed November 2002 Data Notification filed on October 1, 2002. (RQ1292)

Impact: Expected impact in volume is less than 2%.

Billing Measurements

- (3) *Affected Measures:* B-2

Description: The Florida Region Level SQM Report contains BellSouth state specific retail data instead of regional retail data. BellSouth will correct this report to reflect regional BellSouth retail data only. (RQ2045)

Impact: Less than .5% for August data, and no impact on wholesale reporting, as the change only impacts the reporting of BellSouth retail data.

Third Party Testing

BellSouth is making the following changes to address Observations and Exceptions issued by BearingPoint in connection with the third-party test:

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

Description of Change: This proposed change addresses an issue identified in Florida Exceptions 36, 184 and 185, and Georgia Exceptions 167, 168, 169, and 170. Currently, PMAP treats all Partial and Non-Mechanized LSRs as if they are processed in the Central time zone. To account for LSRs worked in either the Central or Eastern time zone, BellSouth proposes applying the Eastern opening time and the Central closing time when calculating Reject Interval and FOC Timeliness durations for all Partial and Non-Mechanized LSRs. BellSouth will make this change effective with November 2002 data. (RQ2080)

Impact of Change: BellSouth expects the impact of this change to be minimal, although it will ensure that BellSouth's performance is not overstated in any case, but will understate performance in some cases.. For Georgia July data, this change caused only one product, UNE - 2W Analog Loop w/LNP Design, to miss the benchmark for the Partially Mechanized Reject Interval (87.23% to 80.85%).

(5) *Affected Measures:* P-9

Description of Change: This item addresses an issue identified for retail CLEC data identified by BearingPoint's PMR-5 Test for SQM reports only. Currently for the SQM reports the metric is calculated as the number of trunks with trouble reports divided by the number of trunk orders completed. For trunk products, the metric should be calculated as the number of trunks with trouble reports divided by number of trunks completed. BellSouth will make this change effective with November 2002 data. (RQ1620)

Impact of Change: This change will cause a decrease in the reported results for both wholesale and retail. For example, the CLEC result was .489795 for July 2002 in Georgia. The denominator was 49 and the numerator was 24. Once this change is implemented, the new metric result would be .0153, with the denominator being 1564 and the numerator being 24.

(6) *Affected Measures:* P-3

Description of Change: This proposed change addresses an issue identified in Florida Observation 210 for Provisioning: Percent Missed Installation Appointments SQM report only. For retail and CLEC data, this SQM metric is calculated by taking the total number of trunks with missed appointments and dividing by the total number of trunk orders completed. As required by the SQM, BellSouth will change this calculation using the total number of trunk orders with missed appointments divided by the total number of trunk orders completed. BellSouth will make this change effective with November 2002 data. (RQ1836)

Impact of Change: Measurement results for both wholesale and retail will increase by approximately 1%.

(7) *Affected Measures:* P-4

Description of Change: This item addresses an issue identified in BearingPoint's PMR-5 Test. The SWO (Stations Worked On) code is included in the section of the completed service order that identifies the number of lines worked on. For the MSS, this data is used to determine the circuit volume category in which to report the order (<10, >=10). A small number of completed orders do not have a SWO code and are currently excluded from the MSS. Consistent with treatment on the SQM reports, BellSouth will include such orders in the <10 category. BellSouth will make this change effective with November 2002 data. (RQ2039)

Impact of Change: Minimal. Affects 0.0001% of the total records in September 2002.

(8) *Affected Measures:* P-12

Description of Change: This change is in response to Florida Exception 201, related to Provisioning: Local Number Portability (LNP) - Percent Missed Installation Appointments SQM Report. Currently, the data reported in the Total Missed Appointment column for CLECs only includes BellSouth-caused missed appointments. BellSouth will update the data reported in this column to include CLEC missed appointments. BellSouth will make this change effective with November 2002 data. (RQ2078)

Impact of Change: This change will have no impact on the MSS and will cause an increase in the total % Missed Appointments on the SQM report.

(9) *Affected Measures:* P-4

Description of Change: This proposed change will address an issue identified in Georgia Exception 162 and Florida Exception 190 for Provisioning: Order Completion Interval SQM Reports. BellSouth will adjust the buckets in the PMAP code to make them consistent with the current Georgia SQM and the Florida Interim SQM. Using the 5-day interval as an example, the current bucket distributions for 0-5 and 5-10 are $0-5 = 0-\leq 5$ and $5-10 = >5-\leq 10$. This change would result in these intervals being $0-5 = 0-4.99$ and $5-10 = 5-9.99$. BellSouth will make this change effective with November 2002 data. (RQ2330)

Impact of Change: No impact on average interval.

(10) *Affected Measures:* O-7 & O-11

Description of Change: This proposed change will address an issue identified in Florida Exceptions 204 and 205 and Georgia Exception 190 for Ordering: Percent Rejected Service Requests SQM and Georgia Exception and 191 for Ordering: Firm Order Confirmation and Reject Response Completeness SQM. Currently, certain LSRs are being excluded from raw data because: (1) they do not have outbound timestamp in EDI; and (2) PMAP cannot identify the type of response that was submitted from the COG interface (xDSL, UDC, UCL, etc.) BellSouth will modify the code to include these LSRs in the denominator of these measures. BellSouth expects to make this change effective with data in the first quarter of 2003. (RQ2185)

Impact of Change: The volume of LSRs affected in Florida for July 2002 was 67 out of 1201 LSRs of this type submitted. No indication that excluded LSRs are different from the average LSR.

(11) *Affected Measures:* P-9

Description of Change: This item addresses an issue identified in BearingPoint's PMR-4 Data Integrity Test for % Provisioning Troubles Within 30 Days of Service Order Completion. Currently, retail or CLEC service orders with M or X action codes with no other outward or inward activity, and service orders for denial and restoral of service, are not being included in the numerator of the measure. BellSouth will make a change to add these orders. BellSouth expects to make this change effective with data in the first quarter of 2003. (RQ1047)

Impact of Change: BellSouth estimates that both retail and wholesale performance results will increase by approximately 2 to 3 percentage points.

PRELIMINARY FEBRUARY 2003 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the February 2002 data month. Results for the February 2002 data month will be posted as follows:

Preliminary results March 21, 2003
Final results March 31, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* O-1, O-2, O-3 & O-11

Description of Change: With the implementation of Release 11.1, CLECs may submit Pre-Orders and Firm Orders via Direct XML in addition to LENS, TAG, and EDI. BellSouth proposes to implement changes to PMAP code to extract data and calculate performance results to capture Direct XML transactions.

Impact of Change: No impact on the data.

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

Description of Change: Currently, the OSS Saturday downtime for Fully and Partially-Mechanized LSRs sourced from LENS or TAG used in PMAP is 10:50 p.m. However, the actual downtime starts at 10:00 p.m. BellSouth proposes to correct the downtime in the coding to match the actual downtime. (RQ2113)

Impact of Change: Based on July 2002 data intervals for 3.0% of Rejects and 1.75% of FOCs would be reduced by up to 50 minutes.

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

Description of Change: Currently, for the OSS downtime used in PMAP BellSouth is excluding mechanized LNP LSRs from 9:00 a.m. to 11:00 a.m. CST on the first Sunday of the month only. However, system downtime is actually 9:00 a.m. – 12:00 p.m. CST each Sunday. BellSouth proposes to correct the downtime in the coding to match the actual downtime. (RQ2183)

Impact of Change: Minimal. For August 2002 there was no impact.

Provisioning Measurements

- (4) *Affected Measures:* P-10

Description of Change: This measure is reported separately for Fully Mechanized, Partially Mechanized and Non-Mechanized LSRs. However, the Partially Mechanized data includes both Partially Mechanized and Non-Mechanized orders. BellSouth proposes to correct the data to remove Non-Mechanized LSRs from the Partially Mechanized data. (RQ1954)

Impact of Change: This change would only affect the CLEC Aggregate Regional Report, although BellSouth is unable to quantify the impact of this change.

- (5) *Affected Measures:* P-3A (Trunks) (Florida Only)

Description of Change: Currently, the denominator for this metric for trunks is the total number of trunks, instead of the total number of appointments on orders for trunks completed in the reporting period. BellSouth proposes to change the denominator to equal the total number of appointments. (RQ2014)

Impact of Change: The measurement result will increase by 1-2% for both retail and wholesale.

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

Description of Change: The PMAP buckets, Digital Loops <DS1 and Digital Loops >=DS1, include Frame Relay service within their data. In order to correctly assign Frame Relay service to either of these buckets, speed level information must be provided. However, BellSouth is currently using an incorrect USOC to designate a circuit as <DS1. BellSouth proposes to use different USOCs to identify speed level, which should be sufficient to ensure that future Frame Relay requests are properly assigned to Digital Loops <DS1 or Digital Loops >= DS1. (RQ2088).

Impact of Change: Based on July 2002 data, 36 orders would move from <DS1 to >=DS1.

- (7) *Affected Measures:* P-7A, P-7B and P-8

Description of Change: Currently, an OCN/ACNA column is not provided on the CLEC specific SQM reports for these measures. BellSouth is considering adding this column to the reports. (RQ2237)

Impact of Change: None.

Maintenance & Repair Measurements

- (8) *Affected Measures:* M&R-1

Description of Change: Currently, the CLEC specific SQM report for Missed Repair Appointments for resale also shows data for UNEs as a separate line on the report. BellSouth proposes removing the line reflecting UNE data from this report. UNEs will continue to appear on the UNE reports. (RQ1693)

Impact of Change: None.

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

Description of Change: Currently, the data on the SQM reports for states other than Louisiana and Florida is reported by MSA and should be reported as a State total. BellSouth proposes to make a change to report State level data for all states other than Louisiana and Florida. In Louisiana the data should be reported by MSA, and the Florida SQM reports already reflect State level data. (RQ1694)

Impact of Change: None.

- (10) *Affected Measures:* M&R 1, M&R 2, M&R 3, M&R 4, & M&R 5

Description of Change: Currently, duplicate records in LMOS for the same trouble report are being incorrectly excluded between the snapshots and the Datamart stages of the PMAP process. BellSouth proposes changing the code to include all of these records in the data Warehouse. (RQ2054)

Impact of Change: Minimal. In August 2002, for Florida and Georgia only 20 trouble tickets were identified as being excluded.

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

Description of Change: Currently, PMAP is overstating the number of retail design lines in service for services => DS1 speed, because records with 'TIE' as part of the circuit ID are being counted. These records are not retail circuits, but are TIE cables between BellSouth and CLEC collocation spaces. The facilities are administered by BellSouth so they appear in the data as BellSouth circuits, merely assigned a circuit ID for inventory management purposes. BellSouth proposes a coding change to exclude these records. (RQ2133)

Impact of Change: Based on June 2002 data, the Retail Design retail analog will increase by .11% across the region.

(12) *Affected Measures:* M&R-4

Description of Change: Currently, for retail and CLEC data repeat report logic compares the receipt date/time of a trouble report against the date/time that the trouble report was closed to determine the 30-day interval. The logic should use the date/time the trouble was cleared, and BellSouth proposes modifying the PMAP code to incorporate this change. (RQ2172)

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

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

Description of Change: Currently, the CLEC specific SQM reports for this metric show a 0 percent, even though the correct numerator and denominator are present. BellSouth proposes to modify this report to reflect the actual percentage in the results. (RQ2177)

Impact of Change: None.

(14) *Affected Measures:* M&R-4

Description of Change: On WFA tickets, the interval to determine whether a repeat trouble occurs is calculated from receipt date of first trouble to closed date of subsequent trouble report. It should be calculated as cleared date of first trouble to receipt date of subsequent trouble report. Consequently, the number of repeat troubles for retail and CLECs are slightly understated. BellSouth proposes a change to correct this situation. (RQ2497)

Impact of Change: The impact is expected to be minimal. For Louisiana in September 2002, only two records were omitted.

Billing Measurements

(15) *Affected Measures:* B-1

Description of Change: Currently, PMAP does not recognize zero (0) values, which results in records with \$0 in the revenue or adjustment columns not being included. BellSouth proposes updating the code to recognize and process zero (0) values as follows.

1) \$0 revenue and \$0 adjustments should be aggregated along with the other records for the CLEC based on OCN/ACNA, invoice type, and state. If there is only one record of this type for a CLEC, then the results would be \$0 revenue and \$0 adjustments with a 100% accuracy.

2) \$0 revenue and a value in the adjustments field should be aggregated along with the other records for the CLEC based on OCN/ACNA, invoice type, and State. If there is only one record of this type for a CLEC, then the results would be \$0 revenue and the \$ amount of the adjustments with a zero (0) % accuracy. (RQ2015)

Impact of Change: Minimal. For July data, only one record in the region was omitted.

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8354-U/7892-U

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