

Matilda Sanders

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Sent: Wednesday, February 02, 2005 1:45 PM
To: Filings@psc.state.fl.us
Cc: Culpepper, Robert; Fatool, Vicki; Slaughter, Brenda ; Nancy Sims; Holland; Robyn P; Bixler, Micheale; Linda Hobbs
Subject: Florida Docket No. 000121A-TP
Importance: High

- A. Debbie Smith
 Legal Secretary for Robert A. Culpepper
 BellSouth Telecommunications, Inc.
 c/o Nancy Sims
 150 South Monroe, Rm. 400
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 debbie.n.smith@bellsouth.com
- B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies (BellSouth Track).
- C. BellSouth Telecommunications, Inc.
 on behalf of Robert A. Culpepper
- D. 38 pages total in PDF format
- E. BellSouth Telecommunications, Inc.'s Fifteenth Notice of Filing Corrective Action Plan and Proposed Notification Report for the March 2005 data month and a Preliminary Notification Report for the data month of April 2005.

Debbie Smith (sent on behalf of Robert A. Culpepper)
 BellSouth Telecommunications, Inc.
 Suite 4300 - Legal Department
 675 W. Peachtree Street
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CMP _____
COM _____
CTR _____
ECR _____
GCL <<bayo.pdf>> <<data.pdf>> <<corrective.pdf>>
OPC _____
MMS *****
RCA _____
SCR _____
SEC 1
OTH _____

2/2/2005

DOCUMENT NUMBER-DATT

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117

Robert A. Culpepper
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February 2, 2005

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000121A-TP
**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

Enclosed are BellSouth Telecommunications, Inc.'s Fifteenth Notice of Filing Corrective Action Plan and Proposed Notification Report for the March 2005 data month and a Preliminary Notification Report for the data month of April 2005, which we ask that you file in the captioned docket. A copy of the same is being provided to all parties as reflected in the attached certificate of service.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record
Marshall M. Criser, III
Nancy B. White
R. Douglas Lackey

DOCUMENT NUMBER-DATE

01238 FEB-2 05

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 2nd day of February, 2005 to the following:

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Robert A. Culpepper

**(+) Signed Protective
Agreement**

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February 1, 2005

DELIVERED BY HAND

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Executive Secretary
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244 Washington Street, S.W.
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Re: *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 Proposed Notification Report for the March 2005 data month and a Preliminary Notification Report for the data month of April 2005. These proposed changes will be discussed at the February 7, 2005 industry conference call.

Enclosed herein, please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

Yours very truly,


Lisa S. Foshee

LSF:nvd
Enclosures

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

570186//570191/570194

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Docket No. 7892-U

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PROPOSED MARCH 2005 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the March 2005 data month. Results for the March 2005 data month will be posted as follows:

Preliminary results April 21, 2005
Final results May 2, 2005

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, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (*e.g.*, LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Provisioning Measurements

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

Description of Change: Currently, orders disconnecting BellSouth.net service, from a line where the voice service is provided via Resale or UNE-P, are being counted as a voice order for the voice service. BellSouth proposes to exclude these disconnect records from the data, per the SQM. This proposed change was Item (1) on the Preliminary March Data Notification filed on January 4, 2005. (RQ5905)

Impact of Change: For July 2004, in Georgia, 22 Resale Business orders and 15 UNE Loop and Port orders would have been removed from data with no impact to the interval.

PRELIMINARY APRIL 2005 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the April 2005 data month. Results for the April 2005 data month will be posted as follows:

Preliminary results May 20, 2005
Final results May 31, 2005

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, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) *Affected Measures: O-3 & O-4*

Description of Change: Currently, the Flow-Through code is incorrectly counting LSRs submitted via ELMS6 to cancel previous submissions as BST errors. BellSouth proposes to correct the code to correctly classify these LSRs as Flow-Through. (RQ6010)

Impact of Change: For December 2004 data, there were 1036 of these LSRs. Flow Through percentages would have increased less than 1%.

(2) *Affected Measures: O-3 & O-4*

Description of Change: Currently, Flow-Through LSRs submitted via XML or EDI, which have related PONs (RPONs) and are manually clarified, are being incorrectly counted as BellSouth errors. BellSouth proposes to correct the code to accurately report these LSRs as CLEC errors. (RQ6011)

Impact of Change: For November 2004, there would have been a .002% increase in the results.

Provisioning Measurements

(3) *Affected Measures:* P-2A

Description of Change: When CSOTS was established, it was updated once a day. To account for the possibility that a CLEC might not be notified of a Non-Mechanized Jeopardy status for up to one day after it occurred, the Non-Mechanized Jeopardy Notice Interval was reduced by 1 day. CSOTS is now updated real time and BellSouth proposes to modify the PMAP code to report the actual measured Jeopardy Notice Interval. (RQ5998)

Impact of Change: For November 2004, in Georgia, the Non-Mechanized Average Jeopardy Notice Interval (provided in advance of jeopardy) for DS1Loops would increase by 8.87%.

(4) *Affected Measures:* P-4

Description of Change: Currently, the CLEC numerator on the 12 month report is reported in whole rounded numbers. BellSouth proposes to change the CLEC numerator to 2 decimal places which is already used to calculate the result. (RQ6029)

Impact of Change: None to measurement results.



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January 31, 2005

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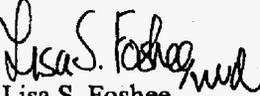
Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling, and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

Enclosed herein please find an original and seventeen (17) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Fifteenth Notice of Filing Corrective Action Plan in the above-referenced docket. I would appreciate your filing this document and returning the two (2) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Yours very truly,


Lisa S. Foshee

LSF:nvd
Enclosures

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

570007/570005

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In Re:)
)
Performance Measurements for) Docket No. 7892-U
Telecommunications Interconnection,)
Unbundling, and Resale)
_____)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FIFTEENTH
NOTICE OF FILING CORRECTIVE ACTION PLAN**

I. INTRODUCTION

Pursuant to the Commission's January 12, 2001, November 14, 2002 and January 22, 2003 Orders, BellSouth Telecommunications, Inc. ("BellSouth") respectfully files its fifteenth corrective action plan, where applicable, for those performance measures for which BellSouth failed to meet the applicable benchmark or retail analogue twice in the past three consecutive months (September, October, and November 2004). BellSouth's filing identifies each of the performance measures and sub-metrics at issue, identifies the months in which the applicable benchmark or retail analogue was not met, and provides an overview of the results of BellSouth's root cause analysis and proposed corrective action, where applicable.

SECTION 1: OPERATIONS SUPPORT SYSTEMS (“OSS”)

OSS-1: RESPONSE INTERVAL – CLEC LOCAL EXCHANGE NEGOTIATION

SYSTEM (LENS) (PRE-ORDERING)

COFFI / Region / RNS (October & November)

This sub-metric captures the response interval through LENS for access to the pre-ordering legacy system COFFI (“Central Office Feature File Interface”) by both BellSouth retail and the CLECs. In a given month, the difference in the response intervals for CLECs and for BellSouth retail using RNS may be relatively minor (based on current data, the differential is approximately 0.1 seconds). The average response interval for September through November 2004 for CLECs is 2.79 seconds compared with the retail analogue of 2.69 seconds. Also, there was an average of 25,000 queries per month for the CLECs compared with over 8,000,000 per month of the retail analogue. Slight differences in response intervals in a given month do not impede a CLEC’s ability to secure information in a timely manner.

OSS-1: RESPONSE INTERVAL – CLEC TELECOMMUNICATIONS GATEWAY

(TAG) (PRE-ORDERING)

PSIMS / Region / RNS & ROS (September, October & November)

This sub-metric captures the response interval through TAG for access to the pre-ordering legacy system PSIMS (“Product/Service Inventory Management System”) by both BellSouth retail and the CLECs. The volume of CLEC queries has decreased dramatically; thus, it is not possible to perform a meaningful root cause analysis. The CLECs averaged less than 5,000 queries per month from September through November 2004, with the retail analogue

averaging over 8,000,000. Due to the TAG retirement schedule and the low volume of CLEC queries performed each month, a detailed system analysis is not warranted at this time.

OSS-4: RESPONSE INTERVAL (MAINTENANCE & REPAIR)

DLR / <= 10 sec. / Region (September, October & November)

DLR / > 10 sec. / Region (September, October & November)

This sub-metric captures the legacy system response interval for Maintenance and Repair OSS for accessing the Detailed Line Record (“DLR”). BellSouth determined that the slight differences in response interval for the CLECs and BellSouth retail accessing the DLR system is primarily attributable to the different uses to which the system is put. In addition, with the replacement of DLR by the CRIS legacy system, the volume of CLEC queries has decreased dramatically, which makes it difficult for BellSouth to implement any system enhancements that would effectively improve overall performance.

LMOSupd / <= 4 sec. / Region (October & November)

LMOSupd / <= 10 sec. / Region (October & November)

LMOSupd / > 10 sec. / Region (October & November)

This measure captures the legacy system access times for Maintenance and Repair OSS for the Loop Maintenance Operations System update (“LMOSupd”) system. While results for these sub-metrics vary between the CLECs and BellSouth retail, these results reflect that the significant majority of CLEC transactions are being rapidly returned. For September through November 2004, 97% of CLEC transactions were returned in 4 seconds or less, and more than 99% of CLEC transactions were returned in 10 seconds or less. Given such performance, any

slight differences with BellSouth retail does not impede a CLEC's ability to secure information in a timely manner.

OSPCM / <= 4 sec. / Region (September and October)

This measure captures the legacy system access times for Maintenance and Repair OSS for the Outside Plant Contract Management System ("OSPCM"). While results for these sub-metrics vary between the CLECs and BellSouth retail, these results reflect that the significant majority of CLEC transactions are being rapidly returned. For September through November 2004, over 30% of CLEC transactions were returned in 4 seconds or less, and more than 99.5% of CLEC transactions were returned in 10 seconds or less. The CLECs received a higher percentage of its responses in less than 10 seconds than the retail analogue during all three months. Also, the less than 4 second submetric was in parity in November. Given such performance, any slight differences with BellSouth retail do not impede a CLEC's ability to secure information in a timely manner.

SECTION 2: ORDERING

O-8: REJECT INTERVAL

Resale Residence / Electronic (September, October & November)

In September 2004, BellSouth returned 26 of 28 rejected LSRs within the 1-hour benchmark, 8 of 9 in October and 5 of 6 in November. However, to meet the 97% benchmark, all 28, 9 and 6 rejected LSRs would have to be met in each month, respectively. With such small volumes only perfection would meet the benchmark.

Local Interconnection Trunks / Manual (September, October & November)

There were only a total of 63 ASRs rejected during the three month period of September through November 2004. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn.

UNE ISDN Loop / Partial Electronic (September & October)

2-Wire Analog Loop Non Design / Partial Electronic (September, October & November)

2-Wire Analog Loop w/LNP Non Design / Partial Electronic (September & November)

The majority of these submetrics were missed due to the small volumes of LSRs rejected during the period. For example, in November 2004 BellSouth returned 16 of 18 rejected LSRs for 2-Wire Analog Loops Non Design within the 7 hour benchmark for 88.89%. However, 17 of 18 were required to meet the 90% benchmark. BellSouth has improved in the partial mechanized area as evident by the reduction of submetrics missed in this 3 month period and will continue to work to meet this very stringent 90% in 7 hour benchmark. Two main issues have been identified that will be corrected with ENCORE Release 17.0 currently scheduled in November 2004. First, repeated facility checks are being made when no response is received from the facility assignment system. The other is a problem with PONs that receives an automatic FOC

from the system that should have been auto-clarified back to the CLEC. To correct this issue, a service representative must manually correct the LSR, which classifies it as partial mechanized but is outside the 7 hour benchmark.

LNP Standalone / Partial Electronic (September, October & November)

During this three month period BellSouth met the 7-hour benchmark for 1332 of 1530 rejected LSRs or 87%. A total of 45 additional LSRs would have been required to meet the 90% benchmark during the period. Two main issues have been identified that will be corrected with ENCORE Release 17.0 currently scheduled in November 2004. First, repeated facility checks are being made when no response is received from the facility assignment system. The other is a problem with PONs that receives an automatic FOC from the system that should have been auto-clarified back to the CLEC. To correct this issue, a service representative must manually correct the LSR, which classifies it as partial mechanized but is outside the 7 hour benchmark.

UNE Other Design / Partial Electronic (October & November)

In October 2004, BellSouth returned 77 of 86 rejected LSRs within the 7-hour benchmark and 89 of 99 in November. However, to meet the 90% benchmark, 78 in October and 90 in November rejected LSRs would have to be met. Both months missed the 90% benchmark by only one LSR.

UNE xDSL / Partial Electronic (October & November)

In October 2004, BellSouth returned 73 of 84 rejected LSRs within the 7-hour benchmark and 63 of 71 in November. However, to meet the 90% benchmark, 75 in October and 64 in November rejected LSRs would have to be met. Two additional LSRs in October and one in November would have met the 90% requirement for this submetric.

O-9: FIRM ORDER CONFIRMATION TIMELINESS

Combo Other / Electronic (September & October)

EELs / Electronic (September & October)

BellSouth returned 12 of 13 FOCs within the 3-hour benchmark in September, 8 of 10 in October and 11 of 11 in November 2004. (Misses for Combo Other and EELs are the same exact PONs, which are counted for both sub-metrics.). It is not possible to perform a meaningful root cause analysis on such a small universe of transactions. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

UNE ISDN Loops / Electronic (October & November)

BellSouth returned 610 of 637 FOCs within the 3-hour benchmark during the period of September through November 2004 for 95.8%. While BellSouth met the 95% benchmark for the three month average, both October and November were slightly under the benchmark with 94.78% and 94.97%, respectively. There were no systemic issues identified for these few FOCs that were outside the benchmark.

UNE Line Sharing / Electronic (September, October & November)

BellSouth returned 2,342 of 2,556 FOCs within the 3-hour benchmark during the period of September through November 2004 for 92%. A total of 87 additional FOCs would have been required to meet the benchmark. There were no systemic issues identified for these few FOCs that were outside the benchmark.

UNE Local Transport / Manual (September & October)

BellSouth returned 6 of 7 FOCs within the 24-hour benchmark in September and 10 of 13 in October 2004. It is not possible to perform a meaningful root cause analysis on such a small

universe of transactions. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

Resale Centrex / Manual (September, October & November)

BellSouth returned 5 of 6 FOCs within the 24-hour benchmark in September, 6 of 7 in October and 9 of 12 in November 2004. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

Resale Design / Manual (September & October)

BellSouth returned 16 of 40 FOCs within the 24-hour benchmark in September, 2 of 4 in October and 4 of 4 in November 2004. A detailed review of these LSRs indicated there were not adequate service representatives available to meet the benchmark. BellSouth has reviewed its personnel staffing requirements to make sure that there are adequate representatives available to meet the benchmark requirements as indicated with 100% of the FOCs being returned within the 24 hour benchmark in November. With less than 20 LSRs and a 95% benchmark, BellSouth is not allowed any missed intervals to meet the parity requirement.

Combo Other / Partial Electronic (September, October & November)

EELs / Partial Electronic (September, October & November)

xDSL / Partial Electronic (September, October & November)

Line Sharing / Partial Electronic (October & November)

Other Design / Partial Electronic (September, October & November)

BellSouth has improved in the partial mechanized area as evident by the reduction of submetrics missed in this 3 month period and will continue to work to meet this very stringent 90% in 7 hour benchmark. While the above submetrics did not meet the 90% benchmark, major

improvement in their overall performance indicates most months averaged above 85%. BellSouth is still investigating two issues. Some of the FOCs are not be handled by the service representatives within the 7 hour benchmark. BellSouth is performing additional reviews with individual employees to improve performance. Also, a number of LSRs are being auto clarified in error and must be corrected manually by a service representative but have surpassed the 7 hours benchmark. BellSouth continues to review these items for resolution.

O-11: FIRM ORDER CONFIRMATION AND REJECT RESPONSE COMPLETENESS

Combo Other / Partial Electronic (September, October & November)

This submetric continues to perform at a level of 93% or better. As stated in previous filings, one of the major issues that affects this measure relates to numerous versions of the same LSR being filed by the CLEC within minutes and LSRs received at the end of the month with the FOC or Reject returned in the following month. When a CLEC submits multiple versions of an LSR within minutes, only the last LSR receives a response. All previous versions do not receive a response and therefore are counted as “missed” responses. BellSouth continues to review the data for the sub-metrics that did not meet the 97% benchmark.

2W Analog Loop Design / Manual (September & October)

INP Standalone / Manual (September & October)

UNE xDSL / Manual (October & November)

BellSouth returned FOCs and Rejects for 95% or higher of the LSRs that were submitted during the period of September through November 2004 for all of these submetrics. The major issue causing BellSouth to miss the 97% benchmark was the CLECs submitting a change to the previous LSR before the initial response had been provided. BellSouth only responds to the latest version at the time of the manual response. Also, in each of these submetrics the volumes

are small and do not allow BellSouth to miss almost any of the returns and still make the 97% benchmark. For the 2W analog loop design, there were a total of 72 LSRs and BellSouth returned 68. The INP Standalone had 48 LSRs with 46 returned by BellSouth. Finally for xDSL, 81 LSRs submitted and 78 returned. For these 3 submetrics, BellSouth did not meet the parity benchmark for 6 of the 9 months and only missed returning four or less LSRs in each category.

SECTION 3: PROVISIONING

P-2B: PERCENTAGE OF ORDERS GIVEN JEOPARDY NOTICES

UNE 2W Analog Loop Non-Design (September, October & November)

UNE Combo Other (September, October & November)

UNE Digital Loops < DS1 (September, October & November)

UNE Digital Loops => DS1 (September, October & November)

UNE ISDN (October & November)

While the percentage of the orders that potentially could have been missed due to a facility problem was larger than the retail analogue comparison for the above submetrics, none of these submetrics were out of parity when compared with the retail analogue for % missed installation appointments. Many of the jeopardies are due to incorrect address formats, etc. and are corrected within minutes of initial review.

P-4A: AVERAGE COMPLETION INTERVAL (OCI) AND ORDER COMPLETION INTERVAL DISTRIBUTION

UNE Other Non-Design / < 10 Circuits / Non Dispatch (September, October & November)

Since this submetric consists mainly of all non-designed products that are not included in the other submetrics, it is almost impossible to determine what, if any issues are causing it to be out of parity. BellSouth has proposed that this submetric be considered a “diagnostic” measure in its latest SQM proposals.

2W Analog Loop Non Design / < 10 Circuits / Dispatch In (September, October & November)

2W Analog Loop w/LNP Non Design / < 10 Circuits / Dispatch In (September, &October)

BellSouth is unable to determine at the time of the FOC whether the order will require a dispatch or not. Therefore, these orders are scheduled with a dispatch interval that will always be longer than the non-dispatched analogue. The majority of these circuits would have met the retail analogue results if compared with the dispatch intervals. Efforts are being pursued to create a one-day interval for wholesale orders where the facility is in place from the customer location to the serving central office main frame for this product.

UNE Combo Other / < 10 Circuits / Dispatch (September, October & November)

BellSouth has determined two issues that adversely impact BellSouth's ability to meet the retail analogue comparison for this submetric. First, the CLEC participants in the industry workshops represented that they would be ordering significant quantities of voice grade EELs (DS0 level), which do not take long to provision. However, in reality CLECs in Georgia are not ordering any voice grade EELs, and the vast majority of the CLEC orders for EELs are at DS1 levels, which take longer to provision. **Second, the performance data for these sub-metrics include EELs when the loop and transport facilities necessary to provision the circuit are not available or when the EEL is at a DS3 level and higher, which generally have provisioning intervals that are considerably longer than five or eight days.**

Nevertheless, Bellsouth has reduced the standard interval from 10 days to 7 days in an attempt to meet the Commission's benchmarks. BellSouth will continue to monitor performance

to determine what, if any, additional provisioning changes can be made to ensure compliance with these benchmarks.

UNE Combo Other / < 10 Circuits / Dispatch In (September, October & November)

There were only a total of sixteen (16) completed orders for this submetric in September through November 2004. Such a small universe of transactions does not make it possible to perform a meaningful root cause analysis from which any conclusions can be drawn. Also, BellSouth is unable to determine at the time of the FOC whether the order will require a dispatch or not. Therefore, these orders are scheduled with a dispatch interval that will always be longer than the non-dispatched analogue.

UNE ISDN / < 10 Circuits / Non-Dispatch (September, October & November)

BellSouth is unable to determine at the time of the FOC whether the order will require a dispatch or not. Therefore, these orders are scheduled with a dispatch interval that will always be longer than the non-dispatched analogue. BellSouth would have met the parity requirement, if compared with the dispatch retail analogue.

UNE UDC/IDSL / < 10 Circuits / Non-Dispatch (September, October & November)

BellSouth is unable to determine at the time of the FOC whether the order will require a dispatch or not. Therefore, these orders are scheduled with a dispatch interval that will always be longer than the non-dispatched analogue. BellSouth would have met the parity requirement, if compared with the dispatch retail analogue.

EELs / < 10 Circuits / Dispatch 30% 5 days ((September, October & November))

EELs / < 10 Circuits / Non Dispatch 30% 5 days (September & October)

BellSouth has determined two issues that adversely impact BellSouth's ability to meet the Commission's benchmarks for EEL provisioning of 30% within 5 days. First, these benchmarks

were established after CLEC participants in the industry workshops represented that they would be ordering significant quantities of voice grade EELs (DS0 level), which do not take long to provision. However, in reality CLECs in Georgia are not ordering any voice grade EELs, and the vast majority of the CLEC orders for EELs are at DS1 levels, which take longer to provision. Second, the performance data for these sub-metrics include EELs when the loop and transport facilities necessary to provision the circuit are not available or when the EEL is at a DS3 level and higher, which generally have provisioning intervals that are considerably longer than five or eight days.

Nevertheless, Bellsouth has reduced the standard interval from 10 days to 7 days in an attempt to meet the Commission's benchmarks. BellSouth will continue to monitor performance to determine what, if any, additional provisioning changes can be made to ensure compliance with these benchmarks.

Digital Loops < DS1 / < 10 Circuits / Dispatch (September, October & November)

Digital Loops < DS1 / < 10 Circuits / Non-Dispatch (September, October & November)

The wholesale results did not meet the parity comparison in September through November 2004. The initial root cause analysis indicated that the major reason for this sub-metric not meeting the parity requirement is the difference in intervals for the retail analogue circuits compared with the CLEC products. The current recommended standard wholesale interval for the products included in this sub-metric range from 5 days to 10 days, currently averaging closer to the 10-day interval. The retail analogue for this product currently averages between 4 and 5 days. BellSouth meets the majority of the scheduled installations for this product as indicated by the %MIA sub-metric. BellSouth continues to look for ways to reduce the CLEC interval for these products, however with many of the wholesale circuits being new

locations compared with additional circuits being added to existing locations for the retail analogue, these intervals will continue to be longer for the CLEC circuits.

P4B: FIRM ORDER AVERAGE COMPLETION (OC) INTERVAL & ORDER

COMPLETION INTERVAL DISTRIBUTION

UNE Other Non-Design / < 10 Circuits / Non Dispatch (September, October & November)

2W Analog Loop Non Design / < 10 Circuits / Dispatch In (September, October & November)

2W Analog Loop w/LNP Non Design / < 10 Circuits / Dispatch In (September & October)

UNE Combo Other / < 10 Circuits / Dispatch (September, October & November)

UNE Combo Other / < 10 Circuits / Dispatch In (September, October & November)

UNE ISDN / < 10 Circuits / Non-Dispatch (September, October & November)

UNE UDC/IDSL / < 10 Circuits / Non-Dispatch (September, October & November)

EELs / < 10 Circuits / Dispatch 30% 5 days (September, October & November)

EELs / < 10 Circuits / Non Dispatch 30% 5 days (September & October)

Digital Loops < DS1 / < 10 Circuits / Dispatch (September, October & November)

Digital Loops < DS1 / < 10 Circuits / Non-Dispatch (September, October & November)

See responses for Measure P4A above, which are equally applicable to these sub-metrics.

P-9: % PROVISIONING TROUBLES WITHIN 30 DAYS OF SERVICE ORDER COMPLETION

UNE ISDN Loops / < 10 Circuits / Non Dispatch (September & November)

There were a total of 47 completed orders with 5 reported troubles during the period of September through November 2004. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions.

UNE Digital Loop ≥ DS1 / ≥ 10 Circuits / Non Dispatch (September, October & November)

There were a total of 33 completed orders with 4 reported troubles during the period of September through November 2004. It is not possible to perform a meaningful root cause analysis on such a small universe of transactions.

P-13: % LNP DISCONNECT TIMELINESS

P-13D: % Disconnect Timeliness Interval for Non Trigger Orders (September, October & November)

BellSouth missed the benchmark of 12 hours for this submetric for September through November 2004. The benchmark for this sub-metric is 95% within 12 hours. This measure has large quantities of telephone numbers tied to one service order. Missing only one service order can reduce the percentage by a large portion. In the majority of the sub-metrics, one or two service orders being missed is the reason the sub-metric does not meet the 95% benchmark. BellSouth continues to focus on meeting the benchmarks for these measures.

BellSouth disconnected 606 of 683 telephone numbers within the 12 hour benchmark during this three month period or 89%. In September 2004, BellSouth disconnected 97 of 113 numbers within the 12 benchmark. In October, 385 of 425 and in November there were 124 of 145 orders completed within the 12 hour benchmark. With a 95% benchmark for such small

volumes of disconnected numbers and with multiple numbers being disconnected on many of the individual orders, BellSouth is not allowed to miss any orders and still meet the 95% parity requirement. No systemic issues for identified for any of the missed orders.

SECTION 4: MAINTENANCE AND REPAIR

M&R-2: CUSTOMER TROUBLE REPORT RATE

Residence / Dispatch (September, October & November)

Centrex / Dispatch (October & November)

Design (Specials) / Dispatch (September, October & November)

Design (Specials) / Non-Dispatch (September, October & November)

Even though BellSouth exceeded the retail analogue comparison for these sub-metrics, BellSouth provided over 97% trouble-free service for both the wholesale and retail lines during September through November 2004. BellSouth did not identify any systemic issues for any of the troubles reported in these sub-metrics.

Combo Other / Dispatch (September, October & November)

Approximately 97% of all in-service lines were trouble free during the period of September through November 2004. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period. The major difference in this comparison is the large volume difference. The retail analogue averages over 3.5 million compared with 9 thousand for the CLEC volume. Furthermore, the majority of the circuits in the analogue are POTS compared with the CLEC circuits that consist mainly of EELs, which are much more complex and have a higher report rate than the basic service of the analogue.

UNE xDSL / Dispatch (September, October & November)

Over 99% of all in-service lines were trouble free during the period of September through November 2004. The vast majority of customers -- both wholesale and retail -- received trouble

free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period.

UNE Line Sharing / Dispatch (September, October & November)

Over 99% of all in-service lines were trouble free during the period of September through November 2004. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period.

Other Design / Dispatch (September, October & November)

Over 97% of all in-service lines were trouble free during the period of September through November 2004. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period. The major difference in parity is due to the difference in volumes for the retail compared with the wholesale. The retail analogue is approximately 45 times larger in volume compared with the CLEC volumes.

UNE Digital Loop <DS1 / Dispatch (September, October & November)

UNE Digital Loop >DS1 / Dispatch (September, October & November)

Over 98% of all in-service lines were trouble free during the period of June through August 2004. The vast majority of customers -- both wholesale and retail -- received trouble free service during the period. BellSouth did not identify any systemic issues for any of the troubles reported during the period.

M&R-3: MAINTENANCE AVERAGE DURATION

Digital Loops >=DS1 / Non-Dispatch (September, October & November)

The CLEC average duration during this period was 3 hours compared to 1.1 hours for the retail analogue. While this did not meet the parity requirement, the fact that all troubles were cleared within a 3 hour window and only an approximate 2 hour difference should not be a problem for the CLECs. In September 2004, there were a total of 47 trouble reports for all CLECs that averaged 3.5 hours clearing time. In October 2004, there were a total of 25 reported troubles for this submetric with the average clearing time falling to 3 hours. November had 28 troubles cleared in 2.5 hours. With such a small number of reports, one trouble report or several quick "fixes" can have a major impact on the monthly average. With the retail analogue having over 1,000 trouble reports, a few long intervals or quick fixes have much less effect on the monthly average. The durations tend to decrease with the higher volumes. The durations are more about the small volumes than the actual average completion intervals. BellSouth did not identify any "systemic" issues concerning this submetric.

SECTION 5: BILLING

B-1: INVOICE ACCURACY

Interconnection (September & November)

During the period of September through November 2004, the CLECs and BellSouth retail received 97% invoice accuracy for this submetric. In September 2004, the CLECs received 95.63% accuracy compared with the accuracy for the retail analogue of 98.85%. In November 2004, the CLECs received 97% compared with the retail analogue of 98.8%. With less than a 2% difference in the comparisons, there were no systemic issues identified for any of the adjustments reported during the period. However, in September one CLEC was billed an incorrect rate due to a failure to remove an outdated USOC from their BBI rate file and was given a \$54,591 adjustment. Two other CLECs received Point of Termination (POT) Bay adjustments that were adjusted due to a change in policy from 2002 for a total of \$35,565. In November, an incorrect mileage chart for one CLEC resulted in a \$43,327 adjustment. These adjustments caused the measurement to be out of parity in September and November.

B-8: NON-RECURRING CHARGE COMPLETENESS

Interconnection (September & November)

This submetric measures the percentage of non-recurring charges that appear on the next available bill. During the period of September through November 2004, the CLECs received 87% completeness for this submetric compared to a 90% benchmark. The major reason for the CLECs not receiving the charges on the next scheduled bill was due to untimely resolution of billing errors by the billing representatives. All personnel have been updated on the need to resolve these billing issues in a timely manner.

SECTION 11: CHANGE MANAGEMENT

CM-6: SOFTWARE ERRORS CORRECTED WITH "X" DAYS

Region / Corrected within 10 Business Days (September, October & November)

Region / Corrected within 30 Business Days (September, October & November)

Region / Corrected within 45 Business Days (September, October & November)

BellSouth did not meet the 95% benchmark for any of the above submetrics during the September through November 2004 time period. As of the end of November 2004, there were a total of 28 type 6 change requests pending with 16 of these requests being past due. A total of 8 severity 2, 16 severity 3 and four severity 4 requests make up the 28 type 6 change requests.

While below the Commission's 95% benchmark, BellSouth's defect correction performance is increasing, particularly given the relatively limited number of defects in BellSouth's software releases. During 2004, BellSouth reduced the average interval from defect validation to correction by 50% and continues to look for ways to reduce this interval further. However, with a 95% benchmark and a limited number of defects per severity type, it will require perfection to meet this benchmark.

CM-11: PERCENT CHANGE REQUESTS IMPLEMENTED WITH 60 WEEKS

Region / Type 5 (September, October & November)

There were a total of 17 scheduled change requests during the three month period with BellSouth meeting the implementation date for 12 of them. With a 95% benchmark, BellSouth must make 100% of all implementation dates to meet parity. While BellSouth did not meet the 95% benchmark, there are currently no past due prioritized change requests in either the Type 4

or 5 categories. All 5 of the missed Type 5 change requests were worked in the November release 17.0.

Respectfully submitted, this 31st day of January 2005.

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CERTIFICATE OF SERVICE

Docket No. 7892-U

This is to certify that on this 31st day of January, 2005, I served a copy of the foregoing, upon known parties of record, via electronic mail as follows:

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