BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment	)	Docket No.: 000121A-TP
Of Operations Support Systems Permanent	)	
Performance Measures for Incumbent	)	
Local Exchange Telecommunications.	)	Filed: October 13, 2005
<u>Companies (BellSouth Track).</u>	)	

SECOND SUPPLEMENTAL AFFIDAVIT OF ALPHONSO J. VARNER

1.   My name is Alphonso J. Varner. The following statements are made under oath and are based on personal knowledge.

2.   I am currently employed by BellSouth Telecommunications, Inc. ("BellSouth") as Assistant Vice President in Interconnection Services. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My responsibilities include oversight and supervision of BellSouth's personnel that are responsible for maintaining BellSouth's performance measurement plans (collectively, "SQM/SEEM plan"), including any revisions to the SQM/SEEM plan that may be required. Such plans include the SQM/SEEM plan established by the Florida Public Service Commission ("Commission") in this docket.

3.   On September 30, 2005 the Commission Staff ("Staff") requested certain additional information concerning BellSouth's original and supplemental affidavits regarding the Liberty Consulting Group SEEM audit. This second supplemental affidavit responds to that request by the Staff.

4.   Specifically, this affidavit addresses the additional requests included in the table attached to the Staff's September 30th Request. BellSouth's responses to that Staff Request are contained in the table attached hereto and submitted as part of this supplemental affidavit.

5.   In addition to the requests in the table, there were two general concerns raised in the Staff's transmittal letter. These concerns are addressed below.

6.   The first general concern was that "Months chosen for determining reposting of data appears to be arbitrary (Findings 4, 18, 21, 23, 25, 27, 28, 30, 32, 33, 37, 42, 43, 45, 52, 53, 57)."

BellSouth notes that there is wide variation in the data months used to determine reposting of data, however, this is not an arbitrary decision. When the determination is made that a change in the PMAP data is necessary, an impact statement is prepared which is generally based on the most current data month at the time the RQ is initiated. The impact statement indicates the overall effect to the results for a measure(s) for a specific month of data. Numerous methods are employed to determine that a change is necessary, including internal verification of monthly data, audit reviews, CLEC referrals and Commission requests. Because the same data used to produce the monthly results are used to evaluate change requests, the most current available data month is typically two or three months earlier than the month that the RQ was created. For example, if a change request is initiated in early October, the most likely data month available to evaluate the change request would be July or August. After the RQ has been initiated it must be scheduled. Because of the PMAP data notification process, a minimum of 90 additional days is required before a change can be implemented. Therefore, a minimum of four to five months will typically elapse between the data month that the impact statement was prepared and the data month that the change was implemented. If there are scheduling delays this period of time could be even longer. The above listed Findings include RQs that were prepared over a period of almost two years so the data months used to determine impacts are spread out over a similar two year period. To facilitate analysis, the date that the RQ was initiated along with the data month utilized for the impact statement are provided in the attached table.

7.   The second concern was that " Affidavits are filed attesting to resolution of Findings

before RQ's have been implemented and results analyzed (Findings 4, 42, 54, 55)." This concern, with respect to findings 4 and 42, results from an apparent misunderstanding of the content of the affidavit. Paragraph 5 of my affidavit filed on September 8, 2005 states:

> "As indicated in the attached Status Report, BellSouth is in the process of verifying that certain action undertaken by BellSouth adequately addresses certain Findings. Accordingly, BellSouth will supplement this affidavit once such verification is completed."
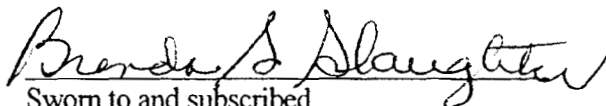
The combination of my initial and supplemental affidavits addresses each finding where staff requested an affidavit. In most cases the change necessary to resolve the finding had been made and verified, so the affidavit definitively stated that the finding or part of the finding addressed by the particular change being discussed was considered to be resolved. In other cases the change necessary to resolve the finding had not been made and verified, so only a status report of the progress in making the change was included. For those parts of the audit, no claim was made in the affidavit that the finding or part of a finding to which the change applied had been resolved. Finding 4 consists of three parts, and changes had been made and verified for only one of the three parts. The September 8th affidavit only claims that the part of the finding for which the change had been made and verified was resolved. The September 8th Affidavit does not attest that finding 42 has been resolved. The RQs to resolve findings 54 and 55 have been made and verified as stated in the September 8th affidavit.

8.   As indicated in the attached reply, BellSouth is in the process of verifying that certain action undertaken by BellSouth adequately addresses certain Findings. Accordingly, BellSouth will again supplement this affidavit once such verification is completed.

9.   This concludes my second supplemental affidavit.

This 13th day of October, 2005.

_____
ALPHONSO J. VARNER

Sworn to and subscribed
Before me this 13 7TH
Day of October, 2005

Notary Public

Brenda S. Slaughter
Notary Public, Rockdale County, Georgia
My Commission Expires July 29, 2006

ATTACHMENT

				Staff's Review of BellSouth's Affidavits

<table>
<tr><td colspan="5" align="center">Staff's Review of BellSouth's Affidavits
Status Report on Implementation of Changes due to Staff's Recommendations Regarding Liberty's Audit</td></tr>
<tr><td>Finding</td><td>Issue</td><td>Measure(s) affected</td><td>RQ Implemented/Date</td><td>Staff Position and Requested Action</td></tr>
<tr>
<td>3</td>
<td>BellSouth was not reporting according to SQM Plan. PMAP report failed to specify "rejected reason"</td>
<td>CM-8</td>
<td>RQ 6071—4/05</td>
<td>3.1 Staff considers this issue resolved and closed.</td>
</tr>
<tr>
<td>4</td>
<td>BellSouth did not report Z scores according to the reporting requirements in the 12-month PMAP reports.</td>
<td>P-2B
M&R-3
B-7
B-8</td>
<td>RQ 6115—7/05
RQ 6112—5/05
RQ 6110—9/05
RQ 6110—9/05</td>
<td>Staff would note that all the RQs for this issue have not been implemented. The issue cannot be resolved and closed until implementation has been completed.

RESPONSE: BellSouth agrees with respect to part of this Finding. According to Al Varner's 9-8-05 affidavit, BellSouth only considers that the part of the Finding that was corrected by RQ6112 has been resolved. The affidavit does not attest that those parts of the Finding to be corrected by RQ 6110 and 6115 have been resolved. These items were only addressed in the affidavit to provide a status report of their progress. A supplemental affidavit will be made after these remaining RQs are implemented and verified.
4.1   Please explain why the May and June 2005 data months were used to determine if reposting is necessary for measurement M&R-3.

RESPONSE: No data for any months was used to determine if reposting was necessary in this case. The issue for M&R-3 along with the other measures in this Finding was the fact that a Z-score was not reported for the measure. The Z-score was being calculated but not posted. Since adding the Z-score to this report did not change any data or the equity results for any previous months, reposting was not necessary. The purpose of the May and June 2005 data was to show that on a going forward basis, a Z-score had been added to the report beginning with May data and adding the Z-score resolved the Finding for M&R-3. The May and June 2005 data was included in the reply because May was the first month of implementation for RQ6112 and June was the latest month available.

4.2 Upon implementation, please provide analysis and impact of RQ 6115 and RQ 6110 on measurements P-2B, B-7, and B-8.

RESPONSE: RQ6115 was implemented in July 2005. As with RQ6112, the Z-score was already being calculated in the P-2B measure for all submetrics but was not being posted with the data. Therefore, the only change was to post the Z-score and beginning with July data that has been added. The remaining change for this Finding, RQ 6110 is currently scheduled for September 2005 implementation for measures B-7 and B-8.</td>
</tr>
<tr>
<td>7</td>
<td>BellSouth does not post</td>
<td>All</td>
<td>RQ6008—7/05</td>
<td>7.1 Please provide the status of the implementation of</td>
</tr>
</table>

Finding	Issue	Measure(s) affected	RQ Implemented/Date	Staff Position and Requested Action
	historical PARIS reports to PMAP website			RQ6008. *RESPONSE: This RQ is currently scheduled for implementation in PARIS Release 4.5.09 for September 2005 data on November 15, 2005.*
10	BellSouth's SDUM scripts improperly excluded all records with a zero denominator	M&R-2	RQ6044—2/05	10.1 Please provide a list of the data months, prior to February 2005, where BellSouth found no records with a zero numerator and a non-zero denominator. *RESPONSE: This Finding did not indicate a problem with the data; it only indicated that the documentation in the SDUM was incorrect. Consequently any data month where replication was attempted using the incorrect SDUM would exclude all records with a zero numerator from the replication results. However, the reported data was correct, so any month before February 2005 had records with a zero numerator.* 10.2 Please explain BellSouth's September 8, 2005 affidavit response stating, "In February 2005, records for over 100 CLECs were found with <u>this criterion</u>." What is meant by "this criterion", and do records from the February 2005 data indicate instances with a zero numerator and a non-zero denominator? *RESPONSE: This criterion meant having a zero numerator and a non-zero denominator. The records from the February 2005 data reflect instances with a zero numerator and a non-zero denominator confirming that the data was correct and that the error was limited to documentation.*
16 (9/18 Affidavit)	BellSouth excluded calculations for a measure because it lacked required information about these transactions that were necessary only for another measure.	All Provisioning and M&R measures	None	With the exception of service orders with a "null" received date, please list other service order error codes that would result in the exclusion of transactions being processed in the SQM. *RESPONSE: There appears to be some confusion because this Finding addressed two different measurement domains, provisioning and maintenance. The "null" received date issue was a specific claim made in the audit finding associated with trouble reports used in measure MR-2, not service orders.* *In response to this request for information concerning service orders, the attached File FPSC item 16.1.xls lists all of the error codes with a description of the error associated with invalid service orders that cannot be used in SQM calculations. As clarification, these items are not excluded from processing in the SQM. That description is applicable to transactions specifically identified as exclusions in the SQM. The transactions described here are invalid records which never entered the SQM dataset for processing.*

Finding	Issue	Measure(s) affected	RQ Implemented/Date	Staff Position and Requested Action
				16.2 Please provide any additional analysis conducted on other service error codes (identified in response to question 16.1 above) that would result in the exclusion in the exclusion of transactions being processed in the SQM.
				RESPONSE: The attached File FPSC item 16.2.xls includes a detailed review of service orders for the region for the July 2005 data month showing the analysis that supported BellSouth's initial response for Finding 16. As stated in that affidavit, only 0.04% of the service orders studied were found to be invalid.
				16.1 Please explain whether or not a transaction with an error code is excluded from one performance measure, is the transaction and error code universally applied and excluded from another performance measures?
				RESPONSE: A transaction with an error code is excluded from all measures. *Current SQM processing and validation are based on utilizing a common set of records for all measures that are derived from the same type of activity. To change BellSouth's SQM processing and validation as suggested by Liberty would be a huge undertaking with little, if any, benefit. For example, the results for at least eight provisioning measures (P-1, P-2A, P-2B, P-3, P-4, P-5, P-6 and P-9) all use a common set of service orders as the basis for calculation. For July 2005, this was a set of about 5,000,000 service orders. This Finding would require creating a separate set of service orders as the basis for each measure with a separate set of edits to determine whether the order was valid for use in that measure. So instead of screening these 5,000,000 orders once, they would have to be screened eight times to create a base of 40,000,000 orders. Based on the July 2005 data analysis, this increase of 32,000,000 orders processed would be done to potentially capture an additional 1931 orders. Even worse, none of these 1931 orders would have in fact been included in the measurement calculations for July 2005 because the errors on the orders made them invalid for all eight of the measures. In this case, the additional processing of 32,000,000 records with the attendant dramatic increase in complexity of the code, processing time and hardware requirements would have yielded no change in results! There is no reason to believe that analysis of other month's data would yield markedly different results.* *It appears that the auditor's concern was driven by an incorrect belief that over a million records would be affected by this issue. However, the auditor may have overlooked the fact that most of the records excluded were not due to errors on the record that rendered the record invalid, but were records that should be excluded*

Finding	Issue	Measure(s) affected	RQ Implemented/Date	Staff Position and Requested Action
				according to the SQM.
18	BellSouth incorrectly reported LNP orders as INP standalone.	O-9 P-9	Implementation of new SQM/SEEM plan in 10/05 will solve this finding.	18.1 Please provide the data month(s) for which BellSouth determined that only 53 records were affected. *RESPONSE: May 2005* 18.2 Please explain if "records" represents the number of orders. *RESPONSE: In this case, records are the number of LSRs submitted by the CLECs that received a FOC.*
20	BellSouth omits coin orders from reported results	O-3 O-4	RQ1944---7/05	20.1 Please provide analysis and impact of RQ1944 on measurements O-3 and O-4. *RESPONSE: There were a total of 5,128 mechanized coin LSRs submitted for the entire region in December 2003. Including these orders would have changed the overall flow through results as follows:* $\quad$ *W/o coin 572,465 / 591,629 = 96.76%* $\quad$ *W coin 574,303/ 595,036 = 96.52% or a change of 0.24%. There is no reason to expect that he impact has changed significantly, since coin is a declining service.* *There were a total of 566 mechanized coin LSRs submitted for the entire region in July 2005. Including these orders would have changed the overall flow through results as follows:* $\quad$ *W/o coin 262,364 / 270,042 = 97.16%* $\quad$ *W coin 262,740 / 270,422 = 97.16% (No Change)*
21	BellSouth was inappropriately excluding non-coordinated hot cuts from the calculation of the measure.	P-7C	RQ4128---3/04	21.1 Please provide the month and year BellSouth discovered non-coordinated hot-cuts were inappropriately being excluded from the calculation of P-7C. *RESPONSE: RQ4128 was initiated on July 18, 2003 so the month of discovery was July 2003.* 21.2 Please explain why the May 2003 data month was used to determine if reposting is necessary. *RESPONSE: At the time of the initial preparation of this RQ, May 2003 was the latest data month available and therefore was used to determine the overall effect of the change.* 21.3 Please explain if "records" represents the number of orders. *RESPONSE: Yes, it is the number of orders.*
23	Orders were misclassified and incorrectly excluded from the measurement calculation	P-3	RQ6033---5/05	23.1 Please explain why the May 2005 data month was used to determine if reposting is necessary. *RESPONSE: The May 2005 data month was not used to*

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				determine whether reposting was necessary. May 2005 data was used to demonstrate that the Finding had been resolved because the RQ was implemented with May 2005 data. This RQ was initiated on January 6, 2005, and November 2004 data, which was the latest available data month available at the time, was used to determine the impact of the change. This change with the impact on measurement results was posted in the preliminary and final notices of measurement changes that were published on March 1 and April 1 2005 respectively. 23.2 Please provide additional analysis to support determination of reposting (i.e., additional data examined to quantify impact on CLEC results by less than 0.01%). *RESPONSE: For the month of November 2004 in Florida, there were a total of 207,752 installation appointments with BellSouth missing 783 or 0.377%. There were 976 appointments that were incorrectly omitted with 20 missed appointments. This increased the total appointments to 208,728 and the missed appointments to 803 or 0.385% for a difference of 0.008%.*
25	BellSouth incorrectly excluded the majority of hot cut orders from P-7C and a smaller subset of orders from P-7.	P-7 P-7C	RQ4989---3/04	25.1 Please provide the month and year BellSouth discovered that orders with an error code of LU01 were being excluded from P-7 and P-7C. *RESPONSE: RQ4989 was initiated on January 27, 2004 so the error was discovered in January 2004.* 25.2 Please provide the data month(s) BellSouth used to determine if reposting is necessary. *RESPONSE: December 2003* 25.3 For the data month(s) BellSouth used to determine reposting please provide the number of coordinated hot-cut orders that were excluded from P-7 that should have been included in the measurement. *RESPONSE: For the month of December 2003 a total of 41 orders were not included in the data for the entire region. Before the change was made, the CLEC Numerator was 2340 and the CLEC Volume was 2353 for a 99.45% result. After the change the CLEC Numerator would be 2,450 and the CLEC Volume would be 2465 for a 99.39%. (The data for December 2003 is currently archived and would require the rerunning of all orders for December 2003 to provide Florida specific results.)* 25.4 For the data month(s) BellSouth used to determine

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				reposting please provide the number of coordinated and non-coordinated hot-cut orders that were excluded from P-7C that should have been included in the measurement. *RESPONSE: The number of orders affected would be 41, which is the same as for measure P-7 above. However, this measure is calculated based on circuits instead of orders. For the month of December 2003 a total of 112 circuits were not included in the data. Before the change, for December the CLEC Numerator was 37 and the CLEC Volume was 4908 for a 00.75%. After the change the CLEC Numerator would be 37 and the CLEC Volume would be 5020 for a 0.74%. (The data for December 2003 is currently archived and would require the rerunning of all orders for December 2003 to provide Florida specific results.)*
2.	BellSouth incorrectly included record change orders in the calculation of each measurement.	P-3 P-4 P-9	~~RQ6033~~---5/05 *RQ6039*	27.1 Please provide the data month(s) BellSouth used to determine if reposting is necessary and why the month(s) was chosen. *RESPONSE: First, there was a typographical error in the RQ number listed in the original affidavit that responded to this finding. Instead of 6033, the number should have been 6039; however, there is no change in the other information provided in the affidavit. November 2004 data was used to determine whether reposting was required, which was the most current month available at the time this RQ was initiated on January 10, 2005.* 27.2 Please explain why 25,771 records found in the April, 2005 data month would not affect reposting. *RESPONSE: The data for April and May 2005, included in the original affidavit, was used to determine the correct implementation of the RQ and was based on the review of BST and CLEC numbers, not just CLEC numbers. There were a total of 2 excludable CLEC orders and 25,769 excludable BST retail orders in this total* *The information used to determine reposting eligibility was November 2004 data. For November 2004, in Florida, 20074 of 807261 (2.4%) of BellSouth retail orders would have been excluded. Likewise, 24 of 120694 (.01%) of CLEC orders volume would have been excluded. Since these are record orders, it is highly unlikely that an appointment would be missed or that a trouble would be reported for the order. Also the completion interval would be very short. Consequently removing these orders would tend to increase the missed appointment and provisioning trouble rates and lengthen the order completion interval. Since most of the orders affected were retail, the largest changes would occur for retail results making those results slightly worse than originally reported and*

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				therefore making it easier for BellSouth to meet the performance standard. Under these circumstances, results would be e reposted at BellSouth's discretion. BellSouth elected not to repost the data in this case.
28	BellSouth incorrectly excluded orders from the calculation of these measures that were properly included in the calculation of other in-scope provisioning measures.	P-7 P-7C	RQ6059---5/05	28.1 Please explain why the December 2004 data month was used to determine if reposting is necessary *RESPONSE: RQ6059 was initiated on January 19, 2005. At the time of the initial preparation of this RQ, preliminary December 2004 was the latest data month available and therefore was used to determine the overall affect of the change. The final December 2004 data was verified on March 2, 2005 in the final impact review.*
29 (9/18 Affidavit)	BellSouth included orders with invalid conversion durations in the calculation of P-7	P-7	None	29.1 Staff considers this issue resolved and closed.
30	BellSouth included certain cancelled orders in both the numerator and denominator of the SQM results, but only in the denominator of the SEEM results.	P-3	RQ5037---6/04	30.1 Please explain why the December 2003 data month was used to determine if reposting is necessary. *RESPONSE: RQ5037 was initiated on February 10, 2004. At the time of the initial preparation of this RQ, December 2003 was the latest data month available and therefore was used to determine the overall affect of the change.*
32	BellSouth overstated the CLEC circuit counts for this measure.	P-7C	RQ4988---4/04	32.1 Please explain why the December 2003 data month was used to determine reposting. *RESPONSE: R4988 was initiated on January 27, 2004. At the time of the initial preparation of this RQ, December 2003 was the latest data month available and therefore was used to determine the overall affect of the change.*
33	During calculation of SEEM results, BellSouth incorrectly excluded transactions from the retail analog of the resale ISDN for these measures	P-3 P-4 P-9	RQ6111---2/05	33.1 Please explain why 13 data months were examined to determine if reposting is necessary. *RESPONSE: The 13 months of data were not analyzed mainly for the purpose of determining eligibility for reposting, but principally to determine when, and how, the PMAP and PARIS databases lost synchronization for the ISDN product groups. Analysis for this purpose also allowed BellSouth to determine reposting eligibility. Since the data was reviewed, it was included in the reply.*
34	BellSouth misclassified some UNE-L orders as non-dispatch, switch-based.	P-3 P-4 P-9	None	34.1 Please provide the status and implementation of training of LCSC personnel to correctly utilize the "C*" PON, including the impact on performance measurement data. *RESPONSE: BellSouth updated the "Service Order Error Corrections" and "CLEC Call Handling" documents on August 25, 2005. The service representatives were covered on this information beginning that same day and have all*

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<tr><td></td><td></td><td></td><td></td><td><i>been trained. Examples were provided to LCSC personnel at the same time for further clarification. September 2005 data will be the first full data month since the updates and the data is not available yet to determine the effect of this training.</i></td></tr>
<tr><td>35</td><td>BellSouth did not include certain wholesale products in the calculation of SEEM for P-9.</td><td>P-3</td><td>RQ6111---2/05</td><td>35.1 Staff considers this issue resolved and closed.</td></tr>
<tr><td>36
(9/18 Affidavit)</td><td>SQM and SEEM levels of disagg. were inaccurate and misleading for the UNE-P product.</td><td>P-3
P-4
P-9</td><td>None</td><td>36.1 Staff continues to investigate BellSouth's response to this issue.</td></tr>
<tr><td>37</td><td>BellSouth incorrectly classified UNE Line Splitting orders as UNE-P when calculating results.</td><td>P-3
P-4
P-9</td><td>RQ4871---4/04</td><td>37.1 Please explain why the May 2004 data month was used to determine if reposting is necessary.

<i>RESPONSE: R4871 was initiated on January 8, 2004. Until the RQ was implemented, BellSouth could not determine how many orders were impacted, so the first month that the RQ was implemented was used to determine the impact for reposting purposes.</i>

37.2 Please explain why the number of records that were identified in the May, 2004 (after implementation of RQ4871) is significantly lower than the number of records identified by Liberty in the November and December, 2003 data months..

<i>RESPONSE: BellSouth only reported the number of orders that were changed with the implementation of RQ4871 and not the overall volume as shown in the Liberty Finding. The overall volume for line-splitting in May 2004 was 193, as compared to the 182 line splitting orders identified by Liberty in November 2003 in this Finding.</i></td></tr>
<tr><td>40</td><td>BellSouth was not including all orders for the Local Interconnection Trunks in the calculation of the SEEM for these measures.</td><td>P-3
P-4
P-9</td><td>RQ6146---2/05</td><td>40.1 Please explain why records left out of PARIS and the SEEM calculation does not affect parity determination.

<i>RESPONSE: First, all of the data was available in PMAP but the SQL script that was used with the PARIS calculations inadvertently omitted the dispatch portion of the trunks only. BellSouth has corrected this issue and with the SEEM recalculations in June 2005 that included all data back to December 2004, there were no adjustments required for Local Interconnection Trunking for the provisioning measures. The added records did not generate a parity failure when run with the updated PARIS code.</i></td></tr>
<tr><td>42</td><td>BellSouth did not align the product IDs for troubles on the line, causing mismatches and resulting</td><td>M&R-2</td><td>RQ5673---11/04
RQ6147---10/05</td><td><i>Staff would note that all the RQs for this issue have not been implemented. The issue cannot be resolved and closed until implementation has been completed.</i></td></tr>
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	in assignment of troubles or lines to the wrong submeasure			*RESPONSE: BellSouth agrees. According to Al Varner's 9-8-05 affidavit, BellSouth does not claim that this Finding has been resolved. Although RQ 5673 was implemented with November 2004 the verification documentation was not ready for transmittal when the affidavit was filed. Therefore, the affidavit only provided a status report of the progress for implementing these RQs. As noted in paragraph 5 of that affidavit, certain items are still in the process of verification and BellSouth indicated that a supplemental affidavit would be forthcoming upon final implementation. The items listed that had not completed were to provide the staff a status of the RQ.* 42.1 Please explain why the December 2004 data month was used to determine if reposting is necessary. *RESPONSE: R6147 was initiated on February 14, 2005. At the time of the initial preparation of this RQ, December 2004 was the latest data month available and therefore was used to determine the overall affect of the change.* 42.2 Please explain how reposting was determined if RQ5673 has yet to be verified. *RESPONSE: Reposting eligibility is usually determined as part of the monthly Data Notification process; therefore, the analysis usually precedes verification or even implementation of the change in most cases. If subsequent verification indicates that reposting is necessary, the data will be reposted.* 42.3 Upon implementation of RQ5673, please provide analysis and impact on measurement M&R-2. *RESPONSE: BellSouth implemented this RQ in November 2004. In October 2004, prior to the implementation of RQ5673, there were a total of 356 product mismatches identified for all submetrics. With the implementation of RQ5673 in November 2004, the quantity of mismatches was reduced to 99. This equates to a 72% reduction.*
43	BellSouth included special access services in some of its retail analog calculations during the audit period, and after correcting the calculations, failed to perform a complete analysis to determine whether reposting was necessary.	M&R-2 M&R-3	None	43.1 Please explain why the February 2004 data month was used to determine if reposting is necessary. *RESPONSE: February 2004 was the latest data available at the time this issue was identified.* 43.2 Please provide supporting documentation to verify that BellSouth updated procedures to ensure compliance with Reposting Policy. *RESPONSE: See attached files FPSC item 43.2a.doc and*

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				FPSC item 43.2b.doc which provide the previous and current procedures respectively.
44 (9/18 Affidavit)	BellSouth included orders with invalid maintenance durations in the calculation of this measure.	M&R-3	None	44.1 Staff considers this issue resolved and closed.
45	BellSouth incorrectly excluded ISDN-BRI for these measures	M&R-1 M&R-2 M&R-3 M&S-4 M&R-5	RQ6111---2/05	45.1 Please explain why 13 data months were examined to determine if reposting is necessary. *RESPONSE: The 13 months of data were not analyzed principally for the purpose of determining eligibility for reposting, but to determine when, and how, the PMAP and PARIS databases lost synchronization for the ISDN product groups. Analysis for this purpose also allowed us to determine the impact for determining reposting eligibility. Since the data was reviewed, it was included in the reply.*
47	BellSouth's manual process for preparing billing data for the B-1 measure did not contain adequate control procedures.	B-1	None	47.1 Please provide a status report and copy of the review and approval process implemented with the August 2005 data for determining billing invoice accuracy. *RESPONSE: The attached confidential files FPSC item 47a.doc and FPSC item 47b.ppt contain the review and approval process that was implemented in August 2005.*
48	BellSouth's manual process for preparing billing data for the B-1 measure did not contain adequate control procedures.	B-1	None	48.1 Please provide an assessment of the risk and control analysis review for the billing process upon the conclusion in September 2005. *RESPONSE: The attached confidential file FPSC item 48.doc provides the requested assessment.*
49 (9/18 Affidavit)	BellSouth's method's for defining revenues and determine which bills are included in the B-1 measure are not addressed by the SQM plan.	B-1	None	49.1 Please further explain what will be included in the Definitions of Account Logic for Invoice Accuracy document. For example, will the document specify how BellSouth defines revenue and what type of bills will be included and excluded from B-1? *RESPONSE: The attached confidential file FPSC item 49.1.doc is a draft of the document that is currently being reviewed for internet posting on October 15, 2005.*
51	BellSouth performed no validation to detect invalid zero dollar remedy payments during the audit period.	All	None	51.1 Please identify the months and years BellSouth performed a check of zero dollar remedy payments to determine that adjustments were not required. *RESPONSE: BellSouth conducted a thorough examination of zero payments and above zero payments from May 2002, when the SEEM administrative plan was implemented in Florida, through December 2003. Beginning in January 2004, BellSouth began transitioning to a more efficient validation process, which focused on the above zero payments and reviewed zero payments when they were flagged mainly through mechanized trend analysis or CLEC inquiries. Since May 2004, zero payment analysis has been performed through*

Staff's Review of BellSouth's Affidavits				
Status Report on Implementation of Changes due to Staff's Recommendations Regarding Liberty's Audit				
Finding	Issue	Measure(s) affected	RQ Implemented/Date	Staff Position and Requested Action
				mechanized trend analysis. 51.2 Please provide the schedule for the automated process to classify zero payments and affidavit attesting to the correction. **RESPONSE:** *BellSouth has subsequently developed requirements for an automated process to classify zero payments. The automated process, which involves comparing the aggregate statistical test and Balancing Critical Value (BCV), will be implemented in the January 2006 timeframe (November 2005 data month). In the interim, comparison of the aggregate statistical test and BCV are being performed via manual execution of SQL scripts.*
52	BellSouth was not calculating the parity measures involving Tier 1 averages according to the SEEM Plan.	M&R-3 P-4	RQ6040----6/05	52.1 Please provide an explanation of the months used by BellSouth to determine that adjustments were to made to SEEM payments. **RESPONSE:** *In accordance with the process set forth by the Reposting of Performance Data and Recalculation of SEEM Payments, after acknowledging the finding uncovered during the audit scope period of November 2003 through January 2004, BellSouth determined that adjustments were to be made "three months in arrears from the date updated performance data was made available or the date when the payment error was discovered". The discovery period for this finding was February 2005, which means that December 2004 was the current data month. Three months in arrears means that adjustments should be made retroactively to September data month; however, a force majeure condition was in effect for these measures for September to November, so retroactive adjustments were only made back to December 2004.* 52.2 After review of BellSouth's response and resulting SEEM adjustments, staff considers it imperative that the implementation of this Finding and the resulting BellSouth SEEM recalculations, and adjustments be reaudited. **RESPONSE:** *BellSouth believes that a more efficient alternative to re-auditing can be utilized.*
53	BellSouth did not make remedy payments for failures associated with these measures.	O-3 O-4	RQ5631---6/04 RQ4932---2/04 RQ5087---4/04	53.1 It appears that point of detection was as early as February, 2004. Please explain why BellSouth did not make adjustments from point of detection. **RESPONSE:** *RQ4932 was initiated to correct the issue of not using the Parent Company Key in some benchmarks for Florida and Tennessee for the Service Order Accuracy, Collocation, Percent Billing Errors Corrected and Usage Data Delivery Accuracy measures. RQ5087*

				Staff's Review of BellSouth's Affidavits

|---|---|---|---|---|
Status Report on Implementation of Changes due to Staff's Recommendations Regarding Liberty's Audit				
Finding	Issue	Measure(s) affected	RQ Implemented/Date	Staff Position and Requested Action
				was initiated to implement the changes covered in RQ4932 in Florida and Tennessee for the remaining 7 states. Since neither of these RQs affected the Flow Through measures, the actual point of detection for this change was June 2004. 53.2 Please provide detailed supporting documentation of adjustments in June, 04 as a result of implementing RQs to correct finding 53, the amounts adjusted, (positive or negative). **RESPONSE:** *There were no adjustments for measures O-3 or O-4 for June 2004. Although RQ5631 could have affected SEEM payments for measures, recalculation of the data showed that these measures were not, in fact, affected.* 53.3 Please provide the PARIS Tier 1 aggregate balance report for June, ~~2005~~ *2004*. **RESPONSE:** *BellSouth does not archive this type of report and is unable to provide the aggregate balance report for June 2004. However, BellSouth has provided the equivalent information that was included in the June 2004 aggregate balance report. See the attached file FPSC item 53.3.xls for this information.* 53.4 Staff considers it imperative that the implementation of this Finding and the resulting BellSouth SEEM recalculations, and adjustments be reaudited. **RESPONSE:** *BellSouth believes that a more efficient alternative to re-auditing can be utilized.*
54	BellSouth did not calculate remedy payments for percentage parity measures	M&R-1 M&R-4 M&R-5 P-3 P-9	RQ6040---6/05 RQ6149---6/05 RQ6003---6/05 RQ6151---4/05 RQ7029---5/05	*Staff would note that all the RQs for this issue have not been implemented. The issue cannot be resolved and closed until implementation has been completed.* **RESPONSE:** *All RQs associated with this Finding have been implemented.* 54.1 Staff considers it imperative that the implementation of this Finding and the resulting BellSouth SEEM recalculations, and adjustments be reaudited. **RESPONSE:** *BellSouth believes that a more efficient alternative to re-auditing can be utilized.*
55	BellSouth did not calculate remedy payments for M&R-2 in accordance with the SEEM plan.	M&R-2	RQ6040---6/05 RQ6149---6/05 RQ6003---6/05 RQ6151---4/05 RQ7029---5/05	*Staff would note that all the RQs for this issue have not been implemented. The issue cannot be resolved and closed until implementation has been completed.* **RESPONSE:** *All RQs associated with this Finding have been implemented.*

| | | | | Staff's Review of BellSouth's Affidavits |
| | | | | Status Report on Implementation of Changes due to Staff's Recommendations Regarding Liberty's Audit |

Finding	Issue	Measure(s) affected	RQ Implemented/Date	Staff Position and Requested Action
				55.1 Staff considers it imperative that the implementation of this Finding and the resulting BellSouth SEEM recalculations, and adjustments be reaudited. *RESPONSE: BellSouth believes that a more efficient alternative to re-auditing can be utilized.*
57	BellSouth improperly excluded some data items and improperly included others in the calculation of SEEM payments.	O-9	RQ5631---6/04 RQ4932---2/04 RQ5087---4/04	57.1 It appears that point of detection was prior to June, 2004. Please explain why BellSouth did not make adjustments from point of detection. *RESPONSE: Same as BellSouth response for item 53.1* 57.2 Please identify the CLECs who received adjustments in June, 2004 as a result of implementing RQs to correct finding 57, the amounts adjusted (positive or negative). *RESPONSE: The following adjustments were made in June 2004:* <table><tr><td>*CLEC*</td><td>*Month*</td><td>*Amount*</td></tr><tr><td>■</td><td>*200403*</td><td>*$456.58*</td></tr><tr><td></td><td>*200404*</td><td>*$656.30*</td></tr><tr><td></td><td>*200405*</td><td>*$853.91*</td></tr><tr><td>■</td><td>*200404*</td><td>*$908.72*</td></tr><tr><td></td><td>*200405*</td><td>*$1305.98*</td></tr></table>
58	CLEC Administrative table update process caused delay payments to CLECs.	All	None	58.1 Staff considers this issue resolved and closed.
59	Process of verify that remedy payments are made is not documented.	All	None	59.1 Please provide supporting documentation to verify the process that remedy payments are made. *RESPONSE: Please see the attached file FPSC item 59.1.doc for this documentation.*

ERROR MESSAGE TABLE

ERR_MSG_CD	ERR_MSG_DESC
CL01	Space Type Code is NULL or Invalid
DB01	Number Of Listings < Number Accurate
DB02	Record Count Is Invalid
DB03	Service Order Number Is Invalid
DB04	Mutual Exclusion Rule Violated For Loaded By Effective Date, Not Loaded Due To CLEC, Not Loaded Due To BST Fields
DT01	Date Field Is Invalid
DT02	Time Field Is Invalid
DT03	Timestamp Is Invalid
DT04	FOC Date And Time Are Not Compatible
DT05	FOC Date And Time Are Valid But Completion Date And/Or Time Are NOT NULL
DT06	First Clarification Date Is Before First Received Date
DT07	Last Received Date < FOC Date
DT08	Received Date Is After Confirmed Date
DT09	Application Date > Completion Date
DT10	Application Date > Original Due Date
DT11	Transaction Date Does Not Match Run Parameter Date
DT12	Response Duration Is Blank Or NULL
DT13	Date Is Blank Or NULL
DT14	Time Is Blank Or NULL
DT15	Cutover Issuance Datetime < Application Datetime
DT16	Response Date Is Prior To LSR Date
GE02	Exclude Q Account Records From SOCS
GE03	Exclude Non-Design Records From SOCS
GE04	BellSouth OCN Of '000' With UNE USOC
GE05	Record Type IN ('MR', 'MC', 'TCLP')
GE06	BellSouth Official Service Work
GE07	Status Code NOT IN ('CP', 'PD', 'PF', 'CA', 'MA')
GE08	Original Incorrect Order = 'Y'
GE09	Special Order Code IN ('I', 'Y', 'M', 'B', 'L', 'E', 'O', 'T', 'X','Z')
GE10	Service Order Type Code = 'N'
GE11	FID Section Is In The Identification Section And FID IN ('ETET', 'EC-BLLG-OPT-CHG')
GE12	FID Section Is In The Billing Section And FID Name = 'PON' And FID = 'EC-BLLG-OPT-CHG'
GE13	Test Production Indicator <> 'P'
GE14	Exclude C Orders With PON Identifier = 'PORTBACK'
GE15	Exclude PTOPS Orders With PON Identifier= 'DISC'
GE16	Exclude Orders With Entry Of 'INRA NEG' In Billing Section Of Order.
GE17	Exclude Orders With Entry Of SPO + First Character Is N. This Is To Exclude all Non-Measured Orders That Are Currently Being Included. (Ref: TC F2241)
GE18	Exclude All Orders With PON Identifier= 'SUCONV'
GE19	Exclude When BST Out Of Franchise Or WorldCom Premium Service Contract
GE20	Exclude ADSL Records
GE21	USOC = 'ADF' And Miscellaneous Account Number Present In TN Section Of The Service Order
GE22	Duplicate Record
GE23	Exclude correction service orders identified by the first two characters of PON identifier being C*
GE24	Administrative Activity
GE25	Excluded ADSL Trouble reports found in the virtual network
GE26	CAVE Test Record
GE27	Wireless Carrier Record
GE28	Miscoded ADSL trouble reports found in the virtual network
GE29	Invalid or Null Receive Date in the EXACT database
GE30	Disconnect Activity
GE31	Mechanical Conversion Orders with ZRTI M, M
GE32	Exclude Special Access Circuits
GE34	Unknown Product - can not be determined accurately because of insufficient/incorrect data
GE35	SLA/SLC Exclusion
GE36	Exclude records for companies with company type code <> 1 (i.e. not a CLEC company)
GE37	Exclusion for Troubles Outside BellSouth¿s Control
LU01	Lookup Failed
LU02	Product Lookup Failed
LU03	Company Lookup Failed

ERR_MSG_CD	ERR_MSG_DESC
LU04	Wire Center Lookup Failed
ML01	Field Must Contain An Integer Greater Than Or Equal To Zero
ML02	Overflow Is Greater than The Peg Count For Any Given Hour
MR01	Telephone Number Is Blank Or NULL
MR02	Circuit Access Code = 'S' And Report Type Code NOT IN ('CR', 'RS', 'RN') And Trouble Code IN ('CPE', 'IEC', 'INF')
MR03	Circuit Access Code = 'S' and SUBSTR(Circuit Identifier (7,1)) IN ('Z',0,1,2,3,4,5,6,7,8,9)
MR04	Circuit Access Code IN ('S', 'M', 'C', 'N')
MR05	Status <> CLD
MR06	SUBSTR(ALOC (7,2)) = 'XA' OR SUBSTR(ZLOC (7,2)) = 'XA' OR Work Order Status Code <> IE
MR07	Circuit Access Code Is Blank Or NULL
MR08	Circuit Identifier Is Blank Or NULL
MR09	Status Code Is Blank Or NULL
MR10	Trouble Type Code Is Blank Or NULL
MR11	Maintenance Center Code Is Blank Or NULL
MR12	Work Order Status Code Is Blank Or NULL
MR13	Maintenance Control Office Code Is Blank Or NULL
MR14	SUBSTR(ALOC (1,8)) OR SUBSTR(ZLOC (1,8)) Is Blank Or NULL
MR15	Report Type Code Is Blank Or NULL
MR16	Trouble Code Is Blank Or NULL
MR17	Circuit Identifier Is Blank Or NULL
MR18	NCI Code Is Blank Or NULL
MR19	Report Type Code(CAT) <> 1 OR General Class Service Code NOT IN (02, 04, 05, 06, 07, 12, 13, 15, 16, 17, 21) OR Full Disposition Code NOT IN (03, 04, 05, 07, 08, 09, 11)
MR20	Work Order Status Code <> 'IE'
MR21	Major Customer Code <> Numeric
MR22	Carrier ACNA Code Is Blank Or NULL
MR23	Trunk Group Count < 1
MR24	Non-Circuit Specific Records That Are In WFA And Are To Be Excluded From Use On Any Measure
MR25	Ticket Contains Changes After Close Of Report Month
MR26	Circuit Format Code = 'M' And Has An Invalid ACNA Code
MR27	LMOS Service Code Is Blank Or NULL
MR28	Network Management Number Is Blank Or NULL
MR29	Not Found Troubles That Are Excluded
MR30	Invalid Line Share OCN
MR31	Line Count Exclusion
OR01	Timestamp Is Invalid
OR02	BellSouth Test Record
OR03	PON Identifier Is NULL
OR04	TAG Log Type Code NOT IN ('T1', 'T2', 'T3', 'T4', 'T5', 'T6', 'T7', 'T8', 'T9', 'T10'. 'T11', 'T12')
OR05	ASR Identifier Is NULL
OR06	Unable To Determine State Code
OR07	EDI Transaction Set Identifier Does Not Match XLATE Direction
OR08	Tracker Is NULL Or Invalid
OR09	Datasource Is NULL Or Invalid
OR10	Not A Matching Incoming T1 TAG Record
OR11	Fatal Reject
OR12	Invalid Flag Combination
OR13	Invalid Transaction Set Purpose Code
PO01	Excluded from the measure due to being a test transaction
PO02	Excluded from the measure due to being ENCORE timeout record
PO03	The timestamp of the LAST event within a specific transaction is greater than the overall END time for the transaction
PO04	Excluded from the ELMU measure due to being ENCORE timeout record
PR01	SUBSTR(Service Order Number,1,1) NOT IN ('N', 'C',' T','D')
PR02	Customer Code Is Invalid
PR03	Appointment Code Is NULL
PR04	The Status Code Is Not In ('CP', 'PC', 'PD', 'PF', 'CA', 'MA') Or The Status Suffix Code Is Not A Space Or 'X' Or The Status Prefix Code Is Not A Space
PR05	Original Committed Due Date Is Blank Or NULL
PR06	Service Order Number Not In The Service Order Fact Table
PR07	Cutover CLEC Delay < -1
PR08	Cutover Coordinated Transfer Code = 'CA'
PR09	Cutover Jeopardy Code IN ('W01', 'W02', 'W04', 'W05', 'W010', 'W011', 'W11', 'W3', 'W45')

ERR_MSG _CD	ERR_MSG_DESC
PR10	Cutover Jeopardy Technical 1 Code IN ('W01', 'W02', 'W04', 'W05', 'W010', 'W011', 'W11', 'W3', 'W45')
PR11	Cutover CLEC Conflict Resolved Datetime Is NULL
PR12	Cutover Scheduled Start Datetime Or Cutover Start Datetime IS NULL
PR13	Cutover RCF Completion Datetime Or Cutover Completion Datetime Or Cutover Start Datetime Is NULL
PR14	Wire Center Code not Valid or State Code Not Found On Lookup
PR15	The Application Or Completion Date Is Less Than The Minimum Calendar Date (01/01/1996)
PR16	CPX With No Matching History
PR17	Cancelled Service Orders
PR18	Service Orders In The HN (Held For Negotiations) Status
PR19	Missing Subsequent Due Date Value
PR21	Circuit Interval ID is null
PR22	Product Class = Exclude
PR23	LNP Order with no Company Key in Service_Request_Fct
PR24	Non-regulated CPE ISDU Service. Excluded service order with basic class of service USOC as DSUXX
PR25	Earliest SOCS Hist Timestamp for the service order is after the original committed due date
PR26	Excluded from measure as CLEC did not contact BellSouth within 30 minutes after the Activate Message
TG01	Invalid Trunk Group Category
TG02	Exclude Reciprocal Trunks
TG03	Date Outside Reporting Period
TG04	Invalid Overflow/Peg Count data (Count => 99999)
TG05	Invalid State Code
TG06	Overflow exceeds Peg Count data
TG07	EXC and BST are not null on the same record
TG08	High Usage Trunk Group with overflow counts > 0
WF01	WFAP Work Order Status Code Is NULL
WF02	WFAP Circuit Access Code Is NULL
WF03	WFAP Circuit Identifier Is NULL
WF04	WFAP ALOC Is NULL
WF05	WFAP Maintenance Control Office Code Is NULL
WF06	WFAP (TRK,3,1) = 'M' And TGAC field Is NULL
WF07	WFAP ZLOC Is NULL
WF08	WFAP SUBSTR(Circuit Access Code, 8,1) Is NOT NULL
WF09	WFAP Orders Field = TRK field
WF10	WFAP Service Date Is NULL And Completion Due Date Is NOT NULL
WF11	WFAP SUBSTR(Circuit Access Code,1,1) = 'S' and CKT Position = ('Z',0,1,2,3,4,5,6,7,8,9)
WF12	WFAP SUBSTR(Circuit Access Code,1,1) NOT IN ('S', 'M', 'C', 'N')
WF13	Wire Center Code Not Valid Or State Code Not Found On Lookup
WF14	WFAP Unable To Locate Circuit Format Code

COUNT(*)	Percent of Total	ERR_MSG_CD	Common Definition
4	0.00%	DT09	Order Error*
4	0.00%	GE26	Test Order
4	0.00%	PR16	Order Error*
10	0.00%	GE08	Administrative Order
44	0.00%	LU04	Lookup Error*
82	0.00%	LU02	Lookup Error*
117	0.00%	LU03	Lookup Error*
244	0.00%	GE34	Lookup Error*
322	0.01%	PR01	Administrative Order
428	0.01%	GE31	Administrative Order
670	0.01%	GE02	Administrative Order
720	0.01%	GE14	Administrative Order
782	0.02%	GE11	Administrative Order
1,351	0.03%	GE23	Administrative Order
1,436	0.03%	PR25	Order Error*
3,274	0.07%	PR22	Internal Activity
5,118	0.10%	GE06	Offical Services
5,597	0.11%	GE16	Administrative Order
6,700	0.13%	GE15	Disconnect Activity
10,612	0.21%	GE27	Internal Activity
15,348	0.31%	PR04	Administrative Order
114,682	2.30%	GE09	Administrative Order
119,541	2.40%	PR05	Canceled or ICO Listing Or
131,611	2.64%	GE17	Administrative Order
150,226	3.01%	GE24	Administrative Order
302,926	6.08%	PR17	Canceled Order
333,605	6.69%	GE21	Internal Activity
442,226	8.87%	PR03	Administrative Order
531,197	10.66%	GE30	Disconnect Activity
2,805,218	56.28%	Not Excluded	
4,984,099	100.00%	Total	

1,931	0.04%	* Total Error Ord	0.09%
893,973	17.33%	Admin Ord	41.03%
531,197	10.66%	Disconnect Ord	24.38%
422,467	8.48%	Cancel Ord	19.39%
352,609	7.07%	Internal/Official	16.18%

ERR_MSG_DESC
Application Date > Completion Date
CAVE Test Record
CPX With No Matching History
Original Incorrect Order = 'Y'
Wire Center Lookup Failed
Product Lookup Failed
Company Lookup Failed
Unknown Product - can not be determined accurately because of insufficient/incorrect data
SUBSTR(Service Order Number,1,1) NOT IN ('N', 'C',' T','D')
Mechanical Conversion Orders with ZRTI M, M
Exclude Q Account Records From SOCS
Exclude C Orders With PON Identifier = 'PORTBACK'
FID Section Is In The Identification Section And FID IN ('ETET', 'EC-BLLG-OPT-CHG')
Exclude correction service orders identified by the first two characters of PON Identifier being C*
Earliest SOCS Hist Timestamp for the service order is after the original committed due date
Product Class = Exclude
BellSouth Official Service Work
Exclude Orders With Entry Of 'INRA NEG' In Billing Section Of Order.
Exclude PTOPS Orders With PON Identifier= 'DISC'
Wireless Carrier Record
The Status Code Is Not In ('CP', 'PC', 'PD', 'PF', 'CA', 'MA') Or The Status Suffix Code Is Not A Space Or 'X' Or The Status Prefix Code Is Not A Space
Special Order Code IN ('I', 'Y', 'M', 'B', 'L', 'E', 'O', 'T', 'X','Z')
Original Committed Due Date Is Blank Or NULL - Order Is Canceled before Assigned
Exclude Orders With Entry Of SPO + First Character Is N. This Is To Exclude all Non-Measured Orders That Are Currently Being Included. (Ref: TC F2241)
Administrative Activity
Cancelled Service Orders
USOC = 'ADF' And Miscellaneous Account Number Present In TN Section Of The Service Order
Appointment Code Is NULL
Disconnect Activity
Total Orders Not Excluded from the SQM Measures
Total Orders

Reposting Of Performance Data and Recalculation of SEEM Payments

BellSouth will make available reposted performance data as reflected in the Service Quality Measurement ("SQM") reports and the Monthly State Summary **("MSS")** report and recalculate Self-Effectuating Enforcement ("SEEM") payments using the Parity Analysis and Remedy Information System **(PARIS),** to the extent technically feasible, under the following circumstances:

1. Those measures included in a state's specific *SQM* plan with corresponding submetrics are subject to reposting.

2. Performance sub-metric calculations that result in a shift in the performance in the aggregate from an "in parity" condition to an "out of parity" condition will be available for reposting.

3. Performance sub-metric calculations with benchmarks that are in an "out of parity" condition will be available for reposting whenever there is a > 2% deviation in performance at the sub-metric level.

4. Performance sub-metric calculations with retail analogues that are in an "out of parity" condition will be available for reposting whenever there is a .5 change in the z-score at the sub-metric level.

5. Performance data will be available with the updated data for a maximum of three months in arrears. Performance data charts (MSS Charts) that incorporate updated data will only be generated as part of the nomal monthly production cycle. A notice will be placed on the PMAP website advising CLECs when reposted data is available.

6. When updated performance data has been made available for reposting or when a payment error in PARIS has been discovered, BellSouth will recalculate applicable SEEM payments. Where technically feasible, SEEM payments will be subject to recalculation for a maximum of three months in arrears from the date updated performance data was made available or the date when the payment error was discovered.

7. Any adjustments for underpayment of Tier 1 and Tier 2 calculated remedies will be made consistent with the terms of the state-specific SEEM plan, including the payment of interest. Any adjustments for overpayment of Tier 1 and Tier 2 remedies will be made at BellSouth's discretion.

8. Any adjustments for underpayments will be made in the next month's payment cycle after the recalculation is made. The final current month **PARIS** reports will reflect the transmitted dollars, including adjustments for prior months where applicable. Questions regarding the adjustments should be made in accordance with the normal process used to address CLEC questions related to SEEM payments.

June 20,2003

March 16 , 2005

Reposting Procedures

Rerun Decision Team

1) With the implementation of a notifiable RQ, a rerun decision will be made by the Rerun Decision Team utilizing the information found within the impact statements and any other supporting documentation requested from the PMRAD group.

2) The Reposting decisions are posted within Test Director under the Parent RQ which initiated the change. This decision will be captured on the document entitled "Notification Reposting Analysis Document" at the time the RQ's are added to Preliminary notification.

3) The Notification team will update MA with rerun and reposting decisions.

4) The Rerun Decision Team will populate the "Notification Reposting Analysis Document" with the attached information. (See Exhibit A)

PMRAD

5) After the initial MA notification, RQ's will be built within Test Director to signal the production teams need to re-run the specific Months requested:
   a. Individual RQ's will be built for each unique month that needs to be re-run.
   b. Each RQ will be assigned to Robert Elmore so that impacts may be assessed on the Production/Development cycle.
   c. They will be placed into the release that corresponds with the month that is being re-run.
   d. All RQ's will be defined as a re-run event and will note the corresponding RQ which initiated the re-runs.

6) Following the building of RQ's, the MA will update the Reposting Analysis Document with Corresponding RQ numbers.(See Exhibit B)

Rerun Decision Team

7) Following the data being rerun, a decision will be made by the Rerun Decision Team as to whether a Reposting will be necessary.

8) The Rerun Decision Team will update the "Notification Reposting Analysis Document" with the information for which States and Months need to be Re-run and subsequently Re-Posted. (See Exhibit C)

PMRAD

8) The current RQ's will be updated with the Reposting decision and at this time the data will be rerun in production and the web reports will be corrected.

9) The Re-Posted MA validation responsibility will include checks for:
   A) Updated months on the Twelve Month Report.
   B) Updated Monthly Aggregate Reports on the Internal Web Site only.
   C) Updated verbiage on the External Web notifying CLEC's of the Repost.
   D) Updated raw data within the SDUM.

10) Once the RQ's are implemented and verified, the RQ's need to be moved from the x-Open status to Open status. The MA then will assign these RQ's back to Yvonne Knowles so that they are documented and closed out.

PUBLIC DISCLOSURE
DOCUMENT

PUBLIC DISCLOSURE
DOCUMENT

PUBLIC DISCLOSURE
DOCUMENT

PUBLIC DISCLOSURE
DOCUMENT

State	Submetric Desc	Year Month Num	Remedy Type	TAV	Remedy	Interest	Total Payment
FL	Billing Invoice Accuracy -- Interconnection	200406	PAY	1	$5,950.00		$5,950.00
FL	Billing Invoice Accuracy -- Resale	200308	PAY	1	$450.00		$450.00
FL	Billing Invoice Accuracy -- Resale	200406	PAY	1	$8,250.00		$8,250.00
FL	Billing Invoice Accuracy -- UNE	200406	PAY	1	$6,900.00		$6,900.00
FL	Billing Mean Time to Deliver Invoices -- CABS	200406	PAY	1	$2,250.00		$2,250.00
FL	Billing Mean Time to Deliver Invoices -- CRIS	200308	PAY	1	$450.00		$450.00
FL	Billing Mean Time to Deliver Invoices -- CRIS	200406	PAY	1	$900.00		$900.00
FL	Customer Trouble Report Rate -- Resale Business	200406	PAY	1	$49,200.00		$49,200.00
FL	Customer Trouble Report Rate -- Resale Centrex	200406	PAY	1	$2,400.00		$2,400.00
FL	Customer Trouble Report Rate -- Resale Design	200406	PAY	1	$14,300.00		$14,300.00
FL	Customer Trouble Report Rate -- Resale ISDN	200406	PAY	1	$5,250.00		$5,250.00
FL	Customer Trouble Report Rate -- Resale PBX	200406	PAY	1	$2,400.00		$2,400.00
FL	Customer Trouble Report Rate -- Resale Residence	200406	PAY	1	$43,300.00		$43,300.00
FL	Customer Trouble Report Rate -- UNE Combo Other	200406	PAY	1	$115,900.00		$115,900.00
FL	Customer Trouble Report Rate -- UNE Digital Loop DS1	200406	PAY	1	$171,000.00		$171,000.00
FL	Customer Trouble Report Rate -- UNE ISDN (includes UDC)	200406	PAY	1	$25,650.00		$25,650.00
FL	Customer Trouble Report Rate -- UNE Line Sharing	200406	PAY	1	$28,500.00		$28,500.00
FL	Customer Trouble Report Rate -- UNE Loop and Port Combo	200406	PAY	1	$141,550.00		$141,550.00
FL	Customer Trouble Report Rate -- UNE Switch ports	200406	PAY	1	$4,750.00		$4,750.00
FL	Customer Trouble Report Rate -- UNE xDSL (ADSL-HDSL-UCL)	200406	PAY	1	$46,550.00		$46,550.00
FL	Firm Order Confirmation Timeliness (Fully Mechanized) -- 2W Analog Loop Design	200406	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Fully Mechanized) -- 2W Analog Loop Non Design	200406	PAY	1	$3,300.00		$3,300.00
FL	Firm Order Confirmation Timeliness (Fully Mechanized) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$1,100.00		$1,100.00
FL	Firm Order Confirmation Timeliness (Fully Mechanized) -- Line Sharing	200406	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Fully Mechanized) -- LNP Standalone	200406	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Fully Mechanized) -- UNE ISDN	200406	PAY	1	$1,100.00		$1,100.00
FL	Firm Order Confirmation Timeliness (Non-Mechanized) -- Line Splitting	200404	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Non-Mechanized) -- Line Splitting	200404	INT			$4.36	$4.36
FL	Firm Order Confirmation Timeliness (Non-Mechanized) -- Line Splitting	200405	PAY	1	$650.00		$650.00

State	Submetric Desc	Year Month Num	Remedy Type	TAV	Remedy	Interest	Total Payment
FL	Firm Order Confirmation Timeliness (Non-Mechanized) -- Line Splitting	200405	INT			$2.99	$2.99
FL	Firm Order Confirmation Timeliness (Non-Mechanized) -- LNP Standalone	200406	PAY	1	$650.00		$650.00
FL	Firm Order Confirmation Timeliness (Non-Mechanized) -- UNE Digital Loop DS1	200406	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- 2W Analog Loop Design	200406	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- 2W Analog Loop Non Design	200406	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$4,200.00		$4,200.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- EELs	200406	PAY	1	$2,600.00		$2,600.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Sharing	200406	PAY	1	$1,400.00		$1,400.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Splitting	200403	PAY	1	$450.00		$450.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Splitting	200403	INT			$6.58	$6.58
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Splitting	200404	PAY	1	$1,100.00		$1,100.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Splitting	200404	INT			$10.66	$10.66
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Splitting	200405	PAY	1	$1,500.00		$1,500.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Splitting	200405	INT			$6.90	$6.90
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Line Splitting	200406	PAY	1	$1,050.00		$1,050.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- LNP Standalone	200406	PAY	1	$3,450.00		$3,450.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- LNP Standalone	200406	PAY	1	$1,400.00		$1,400.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Resale Business	200406	PAY	1	$2,600.00		$2,600.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- Resale Residence	200406	PAY	1	$5,350.00		$5,350.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- UNE Digital Loop DS1	200406	PAY	1	$850.00		$850.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- UNE Loop + Port Combos	200406	PAY	1	$7,750.00		$7,750.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- UNE Other Non Design	200406	PAY	1	$1,050.00		$1,050.00
FL	Firm Order Confirmation Timeliness (Partially Mechanized) -- UNE xDSL (ADSL-HDSL-UCL)	200406	PAY	1	$2,350.00		$2,350.00
FL	FOC & Reject Completeness (Fully Mechanized) -- EELs	200406	PAY	1	$1,850.00		$1,850.00

State	Submetric Desc	Year Month Num	Remedy Type	TAV	Remedy	Interest	Total Payment
FL	FOC & Reject Completeness (Fully Mechanized) -- LNP Standalone	200406	PAY	1	$450.00		$450.00
FL	FOC & Reject Completeness (Fully Mechanized) -- Resale Residence	200406	PAY	1	$450.00		$450.00
FL	FOC & Reject Completeness (Fully Mechanized) -- UNE xDSL (ADSL-HDSL-UCL)	200406	PAY	1	$900.00		$900.00
FL	FOC & Reject Completeness (Non-Mechanized) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$450.00		$450.00
FL	FOC & Reject Completeness (Non-Mechanized) -- EELs	200406	PAY	1	$450.00		$450.00
FL	FOC & Reject Completeness (Non-Mechanized) -- Local Interoffice Transport	200406	PAY	1	$450.00		$450.00
FL	FOC & Reject Completeness (Non-Mechanized) -- Resale Residence	200406	PAY	1	$900.00		$900.00
FL	FOC & Reject Completeness (Non-Mechanized) -- UNE Loop + Port Combos	200406	PAY	1	$2,300.00		$2,300.00
FL	FOC & Reject Completeness (Non-Mechanized) -- UNE Other Non Design	200406	PAY	1	$450.00		$450.00
FL	FOC & Reject Completeness (Partially Mechanized) -- EELs	200406	PAY	1	$2,500.00		$2,500.00
FL	LNP ADTI and Disconnect Timeliness Interval Distribution - Non-Trigger	200406	PAY	1	$7,200.00		$7,200.00
FL	Loop Makeup (Electronic)	200406	PAY	1	$250.00		$250.00
FL	Loop Makeup (Electronic)	200406	PAY	1	$250.00		$250.00
FL	Maintenance Average Duration Dispatch -- 2 w Analog Loop Non-Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Maintenance Average Duration Dispatch -- 2 w Analog Loop Non-Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Maintenance Average Duration Dispatch -- Resale Business	200406	PAY	1	$8,750.00		$8,750.00
FL	Maintenance Average Duration Dispatch -- Resale Residence	200406	PAY	1	$4,050.00		$4,050.00
FL	Maintenance Average Duration Dispatch -- UNE Digital Loop DS1	200406	PAY	1	$11,400.00		$11,400.00
FL	Maintenance Average Duration Dispatch -- UNE ISDN (Includes UDC)	200406	PAY	1	$4,750.00		$4,750.00
FL	Maintenance Average Duration Dispatch -- UNE Loop and Port Combo	200406	PAY	1	$23,750.00		$23,750.00
FL	Maintenance Average Duration Non Dispatch -- Resale PBX	200406	PAY	1	$1,200.00		$1,200.00
FL	Maintenance Average Duration Non Dispatch -- Resale Residence	200406	PAY	1	$2,400.00		$2,400.00
FL	Maintenance Average Duration Non Dispatch -- UNE Digital Loop DS1	200406	PAY	1	$6,650.00		$6,650.00
FL	Maintenance Average Duration Non Dispatch -- UNE Line Sharing	200406	PAY	1	$14,250.00		$14,250.00
FL	Maintenance Average Duration Non Dispatch -- UNE Loop and Port Combo	200406	PAY	1	$14,250.00		$14,250.00
FL	Order Completion Interval (Dispatch < 10) -- 2W Analog Loop Design	200406	PAY	1	$19,000.00		$19,000.00
FL	Order Completion Interval (Dispatch < 10) -- 2W Analog Loop Non Design	200406	PAY	1	$34,200.00		$34,200.00
FL	Order Completion Interval (Dispatch < 10) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$14,250.00	'	$14,250.00

State	Submetric Desc	Year Month Num	Remedy Type	TAV	Remedy	Interest	Total Payment
FL	Order Completion Interval (Dispatch < 10) -- EELs	200406	PAY	1	$13,300.00		$13,300.00
FL	Order Completion Interval (Dispatch < 10) -- Resale Residence	200406	PAY	1	$6,000.00		$6,000.00
FL	Order Completion Interval (Non Dispatch < 10) -- 2W Analog Loop Non Design	200406	PAY	1	$52,250.00		$52,250.00
FL	Order Completion Interval (Non Dispatch < 10) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$38,950.00		$38,950.00
FL	Order Completion Interval (Non Dispatch < 10) -- Resale Residence	200406	PAY	1	$8,400.00		$8,400.00
FL	Order Completion Interval (Non Dispatch < 10) -- UNE Line Sharing w/o Loop Conditioning	200406	PAY	1	$4,750.00		$4,750.00
FL	Order Completion Interval (Non Dispatch Dispatch-In < 10) -- UNE Loop + Port Combo	200406	PAY	1	$184,300.00		$184,300.00
FL	Out of Service (OOS) > 24 Hours Dispatch -- 2 w Analog Loop Non-Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Out of Service (OOS) > 24 Hours Dispatch -- Resale Business	200406	PAY	1	$4,800.00		$4,800.00
FL	Out of Service (OOS) > 24 Hours Dispatch -- Resale Residence	200406	PAY	1	$16,750.00		$16,750.00
FL	Out of Service (OOS) > 24 Hours Dispatch -- UNE Loop and Port Combo	200406	PAY	1	$52,250.00		$52,250.00
FL	Out of Service (OOS) > 24 Hours Non Dispatch -- 2 w Analog Loop Design	200406	PAY	1	$6,650.00		$6,650.00
FL	Out of Service (OOS) > 24 Hours Non Dispatch -- UNE Loop and Port Combo	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Billing Errors Corrected in X Days	200406	PAY	1	$750.00		$750.00
FL	Percent Flow-Through Service Requests (Detail) -- Total LNP	200405	PAY	1	($900.00)		($900.00)
FL	Percent Flow-Through Service Requests (Detail) -- Total LNP	200406	PAY	1	$2,700.00		$2,700.00
FL	Percent Flow-Through Service Request (Detail) -UNE Other	200405	PAY	1	($900.00)		($900.00)
FL	Percent Flow-Through Service Request (Detail) -UNE Other	200405	INT			$4.14	$4.14
FL	Percent Flow-Through Service Request (Detail) -UNE Other	200406	PAY	1	$8,300.00		$8,300.00
FL	Percent Flow-Through Service Request (Detail) -UNE-P	200405	PAY	1	($3,600.00)		($3,600.00)
FL	Percent Flow-Through Service Request (Detail) -UNE-P	200406	PAY	1	$4,000.00		$4,000.00
FL	Percent Flow-Through Service Requests (Detail) -- Total Business	200405	PAY	1	$900.00		$900.00
FL	Percent Flow-Through Service Requests (Detail) -- Total Business	200405	INT			$4.14	$4.14
FL	Percent Flow-Through Service Requests (Detail) -- Total Business	200406	PAY	1	$15,700.00		$15,700.00
FL	Percent Flow-Through Service Requests (Detail) -- Total Residence	200405	PAY	1	$900.00		$900.00
FL	Percent Flow-Through Service Requests (Detail) -- Total Residence	200405	INT			$4.14	$4.14
FL	Percent Flow-Through Service Requests (Detail) -- Total Residence	200406	PAY	1	$16,200.00		$16,200.00

State	Submetric Desc	Year Month Num	Remedy Type	TAV	Remedy	Interest	Total Payment
FL	Percent Missed Installation Appointments (Dispatch < 10) -- 2W Analog Loop Non Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Missed Installation Appointments (Dispatch < 10) -- EELs	200406	PAY	1	$23,250.00		$23,250.00
FL	Percent Missed Installation Appointments (Dispatch < 10) -- Resale Business	200406	PAY	1	$1,200.00		$1,200.00
FL	Percent Missed Installation Appointments (Dispatch < 10) -- Resale Residence	200406	PAY	1	$11,700.00		$11,700.00
FL	Percent Missed Installation Appointments (Dispatch < 10) -- UNE Line Splitting w/o Loop Conditioning	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Missed Installation Appointments (Non Dispatch < 10) -- 2W Analog Loop Non Design	200406	PAY	1	$16,150.00		$16,150.00
FL	Percent Missed Installation Appointments (Non Dispatch < 10) -- Resale Business	200406	PAY	1	$2,400.00		$2,400.00
FL	Percent Missed Installation Appointments (Non Dispatch < 10) -- Resale Residence	200406	PAY	1	$2,850.00		$2,850.00
FL	Percent Missed Installation Appointments (Non Dispatch < 10) -- UNE Line Sharing w/o Loop Conditioning	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Missed Installation Appointments (Non Dispatch Dispatch-In < 10) -- UNE Loop + Port Combo	200406	PAY	1	$38,950.00		$38,950.00
FL	Percent Missed Repair Appointments Dispatch -- 2 w Analog Loop Non-Design	200406	PAY	1	$20,900.00		$20,900.00
FL	Percent Missed Repair Appointments Dispatch -- Resale Business	200406	PAY	1	$3,600.00		$3,600.00
FL	Percent Missed Repair Appointments Dispatch -- Resale Residence	200406	PAY	1	$9,300.00		$9,300.00
FL	Percent Missed Repair Appointments Dispatch -- UNE Loop and Port Combo	200406	PAY	1	$28,500.00		$28,500.00
FL	Percent Missed Repair Appointments Non Dispatch -- 2 w Analog Loop Design	200405	PAY	1	$4,750.00		$4,750.00
FL	Percent Missed Repair Appointments Non Dispatch -- 2 w Analog Loop Design	200405	INT			$21.86	$21.86
FL	Percent Missed Repair Appointments Non Dispatch -- 2 w Analog Loop Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Missed Repair Appointments Non Dispatch -- 2 w Analog Loop Non-Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Missed Repair Appointments Non Dispatch -- Resale Business	200406	PAY	1	$1,200.00		$1,200.00
FL	Percent Missed Repair Appointments Non Dispatch -- Resale Residence	200406	PAY	1	$1,650.00		$1,650.00
FL	Percent Missed Repair Appointments Non Dispatch -- UNE Loop and Port Combo	200406	PAY	1	$49,400.00		$49,400.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- 2W Analog Loop Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- 2W Analog Loop Non Design	200406	PAY	1	$10,450.00		$10,450.00

State	Submetric Desc	Year Month Num	Remedy Type	TAV	Remedy	Interest	Total Payment
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$6,650.00		$6,650.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- EELs	200406	PAY	1	$38,000.00		$38,000.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- Line Sharing	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- Resale Residence	200406	PAY	1	$4,050.00		$4,050.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Dispatch < 10) -- UNE xDSL (ADSL-HDSL-UCL)	200406	PAY	1	$6,650.00		$6,650.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch < 10) -- 2W Analog Loop Design	200406	PAY	1	$6,650.00		$6,650.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch < 10) -- 2W Analog Loop Non Design	200406	PAY	1	$11,400.00		$11,400.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch < 10) -- Resale Business	200406	PAY	1	$4,300.00		$4,300.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch < 10) -- Resale Residence	200207	ADJ	1	($1,200.00)		($1,200.00)
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch < 10) -- Resale Residence	200208	ADJ	1	($450.00)		($450.00)
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch < 10) -- Resale Residence	200406	PAY	1	$24,450.00		$24,450.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch < 10) -- UNE Digital Loop DS1	200406	PAY	1	$9,500.00		$9,500.00
FL	Percent Provisioning Troubles w/in 30 Days of Service Order Completion (Non Dispatch Switch Based < 10) -- UNE Loop + Port Combo	200406	PAY	1	$340,100.00		$340,100.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- 2 w Analog Loop Non-Design	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- Resale Business	200406	PAY	1	$1,200.00		$1,200.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- Resale Residence	200406	PAY	1	$6,000.00		$6,000.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- UNE Combo Other	200406	PAY	1	$9,500.00		$9,500.00

PARIS Transmitted Balance By State Report Tier 1

State	Submetric Desc	Year Month Num	Remedy Type	TAV	Remedy	Interest	Total Payment
FL	Percent Repeat Troubles within 30 Days Dispatch -- UNE Digital Loop DS1	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- UNE Line Sharing	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- UNE Loop and Port Combo	200406	PAY	1	$38,000.00		$38,000.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- UNE Switch ports	200406	PAY	1	$4,750.00		$4,750.00
FL	Percent Repeat Troubles within 30 Days Dispatch -- UNE xDSL (ADSL-HDSL-UCL)	200406	PAY	1	$11,400.00		$11,400.00
FL	Percent Repeat Troubles within 30 Days Non Dispatch -- Resale Business	200406	PAY	1	$2,150.00		$2,150.00
FL	Percent Repeat Troubles within 30 Days Non Dispatch -- Resale Residence	200406	PAY	1	$1,200.00		$1,200.00
FL	Percent Repeat Troubles within 30 Days Non Dispatch -- UNE Switch ports	200406	PAY	1	$42,750.00		$42,750.00
FL	Reject Interval (Fully Mechanized) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$1,050.00		$1,050.00
FL	Reject Interval (Fully Mechanized) -- LNP Standalone	200406	PAY	1	$1,100.00		$1,100.00
FL	Reject Interval (Fully Mechanized) -- UNE Loop + Port Combos	200406	PAY	1	$3,650.00		$3,650.00
FL	Reject Interval (Non- Mechanized) -- Local Interoffice Transport	200406	PAY	1	$450.00		$450.00
FL	Reject Interval (Partially Mechanized) -- 2W Analog Loop Design	200406	PAY	1	$450.00		$450.00
FL	Reject Interval (Partially Mechanized) -- 2W Analog Loop Non Design	200406	PAY	1	$2,300.00		$2,300.00
FL	Reject Interval (Partially Mechanized) -- 2W Analog Loop w/LNP Non Design	200406	PAY	1	$1,400.00		$1,400.00
FL	Reject Interval (Partially Mechanized) -- LNP Standalone	200406	PAY	1	$1,100.00		$1,100.00
FL	Reject Interval (Partially Mechanized) -- Resale Business	200406	PAY	1	$450.00		$450.00
FL	Reject Interval (Partially Mechanized) -- UNE ISDN	200406	PAY	1	$850.00		$850.00
FL	Reject Interval (Partially Mechanized) -- UNE Loop + Port Combos	200406	PAY	1	$5,500.00		$5,500.00
FL	Service Order Accuracy -- Resale	200312	PAY	1	($355.11)		($355.11)
FL	Service Order Accuracy -- Resale	200406	PAY	1	$50.00		$50.00
FL	Service Order Accuracy -- UNE	200312	PAY	1	($152.19)		($152.19)
FL	Service Order Accuracy -- UNE	200406	PAY	1	$150.00		$150.00
FL	Service Order Accuracy -- UNE-P	200312	PAY	1	($50.73)		($50.73)
FL	Service Order Accuracy -- UNE-P	200406	PAY	1	$50.00		$50.00
					$2,215,691.97	$65.77	$2,215,757.74
FL						FL Grand Total	$2,215,757.74

**VERIFICATION DOCUMENTATION
BELLSOUTH PAYS ALL REMEDIES**

BellSouth currently verifies that all appropriate SEEM (Self Effectuating Enforcement Measures) remedy payments are made.

1. Each month all proposed remedies are entered into PARIS in PROPOSED status.
2. Validation decisions are made to accept (validate), change, or reject the payment based on research by analysts familiar with the submetrics involved, the status of the CLEC (Competitive Local Exchange Company), current month data, past month failure counts, state SQM/orders, fee schedules, etc.
3. Each PROPOSED remedy is REJECTED, CHANGED, or VALIDATED in PARIS as determined by the validation analysts.
4. PARIS is queried each month prior to the authorization process to determine that there are no outstanding PROPOSED remedies for the current or any prior month and that there are no remedies remaining in a HELD status (such as a CLEC that is not certified) without a valid, documented cause. Documentation comments are entered in PARIS.
5. All VALIDATED remedies are then SELECTED, AUTHORIZED, and TRANSMITTED to STAR for payment.
6. PARIS is queried to determine that the number of remedies and the dollar amount of the remediesTRANSMITTED to STAR match those numbers AUTHORIZED.
7. STAR processing personnel are notified.
8. Following STAR processing PARIS is queried to identify any remedies HELD due to questions of certification.
9. HELD remedies are investigated and will be returned to PROPOSED for processing in a future month, if appropriate. Held remedies may be rejected if, for example, a CLEC is a cellular company or the CLEC is not certified in the affected state.
10. Monthly queries of PARIS are reconciled against STAR records (remedy by remedy) to identify and correct any discrepancies between the two records. This occurs each month within 10 business days of the transmission of the SEEM remedies. If discrepancies between the two records are found step 9 is repeated until resolution is reached.