



Virginia Tate
Senior Attorney

Suite 8100
1200 Peachtree St., NE
Atlanta, GA 30309
404-810-4922
FAX: 404-810-5901

December 20, 2002

Mrs. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Dear Mrs. Bayo:

RE: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies (BellSouth Track)
Docket No. 000121A-TL

AT&T Communications of the Southern States, LLC hereby files the original and 15 copies of the attached courtesy copy of the "CLEC Coalition Comments on BellSouth's Proposed January and February, 2003 PMAP Changes" filed on December 17, 2002 with the Georgia Public Service Commission in Docket No. 7892-U.

Please stamp the extra copy and return to Lisa Riley in the enclosed envelope. Thank you and please contact Ms. Riley on 404-810-7812 if there are any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Virginia Tate".

Virginia Tate

Enclosures

cc: Parties of Record

DOCUMENT NUMBER-DATE

13892 DEC 20 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail on this 20th day of December 2002 to:

(*) Blanca S. Bayo
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 3239-0850

Ms. Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Michael A. Gross
Florida Cable Telecommunications Assoc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32302

Nanette Edwards
Brian Musselwhite
ITC Deltacom
4092 South Memorial Parkway
Huntsville, AL 35802

Donna C. McNulty
MCI Worldcom
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301-2960

John D. McLaughlin, Jr.
KMC Telecom, Inc.
1755 North Brown Road
Lawrenceville, GA 30043

Wayne Stavanja/Mark Buechele
Supra Telecom
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32301

Kelley Law Firm
Jonathan Canis
Michael Hazzard
1200 19th St., NW, Fifth Floor
Washington, DC 20036

Messer Law Firm
Floyd Self
Norman Horton
P.O. Box 1867
Tallahassee, FL 32302

Pennington Law Firm
Peter Dunbar
Karen Camechis
P.O. Box 10095
Tallahassee, FL 32302-2095

Rutledge Law Firm
Kenneth Hoffman
John Ellis
P.O. Box 551
Tallahassee, FL 32302-0551

McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301

Kimberly Caswell
Verizon Select Services, Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

John Rubino
George S. Ford

Z-Tel Communications, Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602-5706

Renee Terry
e.spire Communications, Inc.
131 National Business Parkway, #100
Annapolis Junction, MD 20701-10001

William Weber
Covad Communicatoins Company
19th Floor, Promenade II
1230 Peachtree Street, NE
Atlanta, GA 30309-3574

Dulaney O'Roark, III
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

Richard Melson
Hopping Law firm
P.O. Box 6526
Tallahassee, FL 32314

IDS Telcom, LLC
Angel Leiro/Joe Millstone
1525 N.W. 167th Street, Second Floor
Miami, FL 33169-5131

Katz, Kutter Law Firm
Charles Pellegrini/Patrick Wiggins
106 East College Avenue, 12th Floor
Tallahassee, FL 32301

Mpower Communications Corp.
David Woodsmall
175 Sully's Trail, Suite 300
Pittsford, NY 14534-4558

ALLTEL Communications, Inc.
C/O Ausley Law Firm
Jeffrey Wahlen
PO BOX 391
Tallahassee, FL 32302


Virginia C. Tate



Suzanne W. Ockleberry
Senior Regulatory Attorney
Law & Government Affairs

Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309-3579
404 810 1175
FAX 404 877-7046
suckleberry@att.com

December 17, 2002

BY HAND DELIVERY

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334-5701

**Re: Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale; Docket 7892-U**

Dear Mr. McAlister:

Enclosed please find an original and fifteen (15) copies of "**CLEC Coalition Comments on BellSouth's Proposed January and February, 2003 PMAP Changes**" in the above-referenced docket.

I have also enclosed a diskette containing the document. After filing the originals, please return two additional copies stamped "filed".

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Suzanne W. Ockleberry".

Suzanne W. Ockleberry

Enclosures
cc: Parties of Record



BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

IN RE: Performance Measurements for)
Telecommunications Interconnection,) **Docket No. 7892-U**
Unbundling and Resale)

CLEC COALITION COMMENTS ON BELL SOUTH'S
PROPOSED JANUARY AND FEBRUARY, 2003
PMAP CHANGES

Comes Now the CLEC Coalition¹, pursuant to the Commission Order issued in the above referenced docket on July 19, 2002, and files these Comments on BellSouth's Proposed January Revisions, Items 4 and 5 and Preliminary February Revisions, Items 12 and 14 as filed with this Commission on December 2, 2002.

I. **JANUARY PROPOSED REVISIONS**

Item 4 –Affected Measures: O-8, O9, O-14, and O-15

In an attempt to satisfy several Observations and Exceptions issued by Bearing Point in connection with the Third Party Test in Florida and Georgia, it appears that BellSouth intends to change the time zone receipt “time stamp” for processing Local Service Requests (“LSRs”). The December 2, 2002 filing states:

“To account for LSRs worked in either the Central or Eastern time zone, BellSouth proposes applying the Eastern opening time and the Central closing time when calculating Reject Interval and FOC Timeliness durations for all Partial and Non-Mechanized LSRs.”

BellSouth Notification Report for January 2003 Data Month dated December 2, 2002, p. 2

¹ AT&T Communications of the Southern States, LLC, Cbeyond Communications, Inc., DIECA Communications, Inc. d/b/a Covad Communications Company, and WorldCom, Inc.

On the December 6, 2002 industry call, BellSouth indicated that it intends to treat all LSRs as though they were received based on Eastern time, and all Firm Order Confirmations ("FOCs") and LSRs returned as though they were processed on central time. BellSouth maintains in its filing that the change "... will ensure that BellSouth's performance is not overstated in any case, but will understate performance in some cases."

However, the CLEC Coalition is concerned that the BellSouth performance will be overstated, not understated as BellSouth contends. For example, if a CLEC sends an LSR from the Eastern time zone, it would be treated as though sent from the Eastern Time zone, but the FOC will be time-stamped based upon the Central time zone. Therefore, in this scenario, the CLEC would receive the FOC, for example at 3:00 p.m. e.s.t., but BellSouth will measure its performance as though it returned the FOC at 2:00 p.m. e.s.t. This gives BellSouth an hour longer than the performance standard allows for all Eastern Time zone LSRs. Obviously, it would be the reverse for LSRs issued from the Central time zone, allowing BellSouth one hour less than the standard to process the LSR. (For example, the CLEC issues a LSR at 9:00 a.m., but BellSouth measures itself as though it was received at 8:00 a.m.) Yet, because the highest volume of LSRs BellSouth receives are from the Eastern time zone, the proposed change appears to be to BellSouth's advantage. For example, applying the Central Time Zone time stamp to LSRs originating from the Eastern Time zone adds an additional hour to the interval of seven (7) hours just ordered by the Commission on November 14, 2002, to eight (8) hours. If however, BellSouth's proposal is different than the CLEC Coalition's

understanding, the CLEC Coalition requests that BellSouth provide a written filing clearly describing its plans and the impact on LSRs for each time zone.

If, however, the CLEC Coalition's understanding is correct, the CLEC Coalition requests that this Commission direct BearingPoint to devise a solution to the Observations and Exceptions that does not skew BellSouth's performance results for O-8, O-9, O-14 and O-15.

Item (5) –Affected Measures: P-9

BellSouth proposes to change the calculation for this measure to the number of trunks with trouble reports divided by the number of trunks completed. During the December 6th industry call, CLECs objected to this change because it does not comply with the Service Quality Measures ("SQM"). The SQM requires the calculation to be the number of trouble reports (on all completed orders 30 days following service order completion) divided by all service orders completed in the previous report calendar month. In response to the CLEC's objections, BellSouth indicated on December 11th during the 2002 Florida and Georgia third party test calls, that the proposed change would be withdrawn and an alternative proposed in the future. Based upon the foregoing, the CLEC Coalition requests that this Commission reject the proposed change for P-9.


II. FEBRUARY PRELIMINARY CHANGES

Items 12 and 14-Affected Measure M&R-4

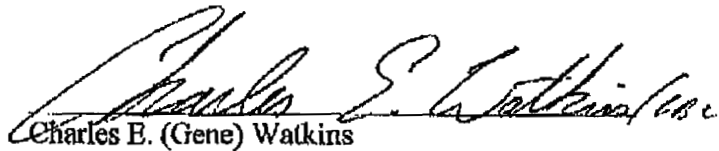
According to BellSouth, the proposed changes for these two items are the same; Item 12 addresses Loop Maintenance Operations Systems (LMOS) and Item 14 addresses

Work Force Administration (WFA). While the two items appear to be different, based upon the December 6th industry call, BellSouth believes that this measure (for data from both WFA and LMOS) should be calculated using the *cleared* date of first trouble to the *receipt* date of subsequent trouble report” to determine if a particular trouble report would be included in the numerator of the SQM calculation. However, this is contrary to the SQM which requires the numerator of this measure to be the count of closed troubles “where more than one trouble report was *logged* for the same service line within a continuous 30 days”. Further, the business rules indicate that this measure “[i]ncludes customer trouble reports *received* within 30 days of an original Customer Trouble *report*”. Finally, there is no reference to cleared troubles in this measure. Based on the language of the SQM, the interval BellSouth should be using to determine whether a closed trouble would be included in the numerator of this measure is the *receipt* of first trouble to the *receipt* of subsequent trouble. Not only is this consistent with the SQM language, it more closely aligns with customer experience. Therefore, BellSouth’s proposal should be rejected and this Commission should require BellSouth to comply with the SQM requirements as described above.

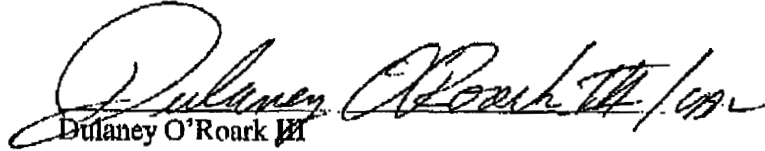
Respectfully Submitted this 17th day of December, 2002.



Suzanne W. Ockleberry
AT&T Communications of the Southern States, LLC
1200 Peachtree Street, NE, Suite 8100
Atlanta, Georgia 30309
(404) 810-7175 (telephone)



Charles E. (Gene) Watkins
Senior Counsel, Covad Communications Co.
1230 Peachtree Street, NE, 19th Floor
Atlanta, Georgia 30309
(404) 942-3492 (telephone)



Dulaney O'Rourke
MCImetro Access Transmission Services, LLC and
WorldCom, Inc.
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328
(770) 284-5498 (telephone)

Attorney for WorldCom, Inc.

CERTIFICATE OF SERVICE

Docket 7892-U

I hereby certify that on December 17, 2002, I served copies of the foregoing **“CLEC Coalition Comments on BellSouth’s Proposed January and February, 2003 PMAP Changes”** by placing a copy of same in prepaid envelopes, addressed to all parties of record in this proceeding, and by depositing said envelopes and their contents in the United States Mail in Atlanta, Georgia.

Ms. Kristy Holley, Director
Consumers’ Utility Counsel Division
Governor’s Office of Consumer Affairs
47 Trinity Ave., SW, 4th Floor
Atlanta, Georgia 30334

Mr. Newton M. Galloway
Smith, Galloway, Lyndall & Fuchs, LLP
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, Georgia 30229

Mr. Peter Canfield
Dow, Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346-2108

Mr. Charles A. Hudak
Gerry, Friend & Harris, LLP
Suite 1450
Three Ravinia Drive
Atlanta, Georgia 30346-2131

Mr. David I. Adelman, Esq.
Sutherland, Asbill & Brennan
999 Peachtree Street, N.E.
Atlanta, Georgia 30334

Mr. Daniel Walsh
Assistant Attorney General
Department of Law
40 Capitol Square
Atlanta, Georgia 30334

Mr. William R. Atkinson
Sprint Communications Company
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, Georgia 30339

Ms. Rebecca C. Stone
Arnall Golden & Gregory LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3450

Mr. Walt Saprosov
Gerry & Saprosov
Suite 1455
Three Ravinia Drive
Atlanta, Georgia 30346

Mr. Bennett L. Ross
BellSouth Telecommunications, Inc.
Room 376
125 Perimeter Center West
Atlanta, Georgia 30347

Ms. Wanda Montano
U.S. Lec of Georgia, Inc.
6801 Morrison Blvd
Charlotte, NC 28211

Mr. Charles V. Gerkin, Jr.
Suite 610 – PMB 307
4135 LaVista Road
Tucker, GA 30085

Ms. Rina Y. Hartline
Director of State Regulation
Birch Telecom of the South, Inc.
502 W. 14th St.
Austin, TX 78701

Mr. Allan C. Hubbard
Dickstein, Shapiro, Morin & Oshinsky, LLP
2101 L Street, N.W., Suite 800
Washington, DC 20037

Mr. Scott A. Sapperstein
Senior Policy Counsel
Intermedia Communications Inc.
3625 Queen Palm Drive
Tampa, FL 33619

Mr. De O'Roark,
Sr. Council WorldCom, Inc.
Concourse Corporate Center Six
6 Concourse Parkway, Ste 3200
Atlanta, GA 30328

Mr. Harris R. Anthony
BellSouth Long Distance, Inc.
28 Perimeter Center East
Atlanta, GA 30346

Mr. Kent Heyman
General Counsel
Mpower Communications Corporation
171 Sully's Trail, Suite 202
Pittsford, NY 14534

Ms. Nancy Krabill
Director of Regulatory Affairs
1300 West Mockingbird Lane Suite 200
Dallas, TX 75247

Ms. Catherine F. Boone
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328-3495

Mr. Peyton S. Hawes, Jr.
Suite 1100
127 Peachtree Street, N.E.
Atlanta, Georgia 30303-1810

Mr. Eric J. Branfman
Swidler Berlin Shereff Friedman LLP
3000 K Street NW Suite 300
Washington, DC 20007

Mr. Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Mr. Brian Sulmonetti
WorldCom, Inc.
Concourse Corporate Center Six
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

Mr. Enrico C. Soriano
Kelley, Drye & Warren, LLP
1200 19th Street, N.W., Suite 500
Washington, DC 20036

Mr. Stephen C. Schwartz
ATA Communications, LLC
1461 Hagysford Road
Norbeth, PA 19072

Ms. Nanette Edwards
Regulatory Attorney
ITC DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802

Mr. Ronald V. Jackson
Friend, Hudak & Harris, LLP
Three Ravinia Drive, Ste 1450
Atlanta, GA 30346

Mr. John McLaughlin Jr.
KMC Telecom Holdings, Inc.
1755 North Brown Road
Lawrenceville, GA 30043

Mr. Rodney Page
ACCESS Integrated Networks, Inc.
4885 Riverside Dr.
Macon, GA 31210

Mr. Frank B. Strickland, Esq.
Anne W. Lewis, Esq.
Strickland Brockington & Lewis
P.O. Box 942358
Atlanta, GA 31141

Ms. Lori Reese, Esq.
NewSouth Communications Corp.
Two North Main Street
Greenville, SC 29601

Mr. Charles B. Welch, Jr. Esq.
Farris, Mathews, Branan, Bobango &
Hellen, PLC
618 Church Street, Ste 300
Nashville, TN 37219

Ms. Genevieve Morelli
Andrew M. Klein
Kelly Drye & Warren LLP
1200 Nineteenth St. NW
Washington, DC 20036

This 17th day of December, 2002.


Suzanne W. Ockleberry