

ORIGINAL

Legal Department

J. Phillip Carver
Senior Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

February 6, 2004

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COMMISSION
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Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 031072-TL

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Notice of Filing of BellSouth Telecommunications, Inc., which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver
J. Phillip Carver (att)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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**CERTIFICATE OF SERVICE
DOCKET NO. 031072-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and FedEx this 6th day of February , 2004 to the following:

Felicia Banks
Jeremy Susac
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No.: 850 413-6216
fbanks@psc.state.fl.us
jsusac@psc.state.fl.us

Charles Watkins
Covad Communications Company
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3492
Fax. No. (404) 942-3495
gwatkins@covad.com

Vicki Gordon-Kaufman
McWhirter Reeves McGlothlin
Davidson Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
vkaufman@mac-law.com
Represents Covad

Tracy Hatch
AT&T Communications of the
Southern States, LLC
101 North Monroe Street, Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361
thatch@att.com

Donna McNulty
MCI WorldCom, Inc.
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mcnulty@wcom.com

Nanette S. Edwards
Director-Regulatory
ITC^DeltaCom Communications, Inc.
4092 South Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
Fax. No. (256) 382-3936
nedwards@itcdeltacom.com

Joseph A. McGlothlin
McWhirter Reeves McGlothlin
Davidson Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
jmclglothlin@mac-law.com
Represents Network Tel. Corp.



J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of CLEC Coalition)	
To Develop a Process to Evaluate)	Docket No. 031072-TL
BellSouth Telecommunications, Inc.'s)	
Compliance with the 50/50 Plan, a)	Filed: February 6, 2004
Portion of the Change Management)	
<u>Process</u>)	

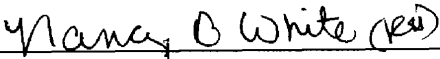
NOTICE OF FILING

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Notice of Filing in this proceeding and states the following:

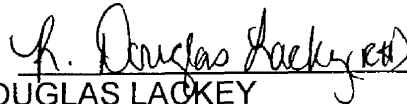
1. On January 27, 2004, an informal meeting was held in this matter, which was attended by representatives of the Commission Staff, BellSouth, and various CLECs. During this meeting, BellSouth stated its belief that most of the issues raised by the CLECs in their Petition in this matter are already being addressed by the additional assertions of BellSouth, which will be subject to third party verification. The Staff requested that BellSouth provide more information in this regard. Accordingly, BellSouth prepared the attached matrix. This matrix maps the various issues raised in the CLEC Coalition Petition to the specific aspects of the BellSouth assertions that address these issues.

Respectfully submitted this 6th day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

 (rs)

NANCY B. WHITE
Museum Tower
150 West Flagler Street
Suite 1910
Miami, Florida 33130

 (rs)

R. DOUGLAS LACKEY
J. PHILLIP CARVER
General Attorneys
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375
(404) 335-0710

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CLEC Coalition FPSC Petition
 Mapped with the
 BellSouth Assertions for the 50-50 Attestation

CLEC Coalition Petition Items	Associated BLS Assertions, notes
How is the sizing determined for all change request types?	The unit sizing determined for all CR types is and has been performed since July 2003 with a consistent, documented methodology common to all vendors and systems included within the scope of the CCP as stated in the process guide.
What are the critical elements and/or systems assessed in this process?	Since July 2003, a documented process has been consistently followed to monitor the accuracy of unit sizing, in both projected estimates and actual release implementation for CRs.
Do different systems have different capacity issues and how is capacity assessed for those systems?	The unit sizing determined for all CR types is and has been performed since July 2003 with a consistent, documented methodology common to all vendors and systems included within the scope of the CCP as stated in the process guide.
What are the 'standards' or 'rules' utilized by BellSouth SMEs to conduct the unit sizing work effort?	Since July 2003, a documented process has been consistently followed to monitor the accuracy of unit sizing, in both projected estimates and actual release implementation for CRs.
How does BellSouth management determine if SMEs are consistently implementing the standards' or 'rules' for determining unit sizing? For implementation?	BellSouth maintains internal controls over the process of accepting features and defect Change Request hours from vendors through to the creation of the Monitoring and Reporting Post Release Capacity Utilization Report, dated February 15, 2004, that are designed to provide reasonable assurance regarding the accurate preparation of The Monitoring and Reporting Post Release Capacity Utilization Report. The unit sizing determined for all CR types is and has been performed since July 2003 with a consistent, documented methodology common to all vendors and systems included within the scope of the CCP as stated in the process guide.
What is BellSouth's process for monitoring the accuracy of unit sizing for change requests?	BellSouth maintains internal controls over the process of accepting features and defect Change Request hours from vendors through to the creation of the Monitoring and Reporting Post Release Capacity Utilization Report, dated February

CLEC Coalition FPSC Petition
 Mapped with the
 BellSouth Assertions for the 50-50 Attestation

	15, 2004, that are designed to provide reasonable assurance regarding the accurate preparation of The Monitoring and Reporting Post Release Capacity Utilization Report.
All defects, especially the defect process and unit sizing, should be included in the audit.	The Monitoring and Reporting Post Release Capacity Utilization Report dated February 15, 2004, accurately reports, by category (i.e. maintenance, defects, etc.), the number of units dedicated to Change Requests for 2003 as received by BellSouth from its vendors based on the criteria below [see the entire assertions page]. The unit sizing determined for all CR types is and has been performed since July 2003 with a consistent, documented methodology common to all vendors and systems included within the scope of the CCP as stated in the process guide.
Incorrect assignment of hours	BellSouth Management asserts that the Monitoring and Reporting Post Release Capacity Utilization Report accurately reports the category and number of units dedicated to the Change Requests for each quarter of 2003.
Failure to share payments for defective software.	[This is not an auditor issue and is outside the scope of this audit.]
Incorrect allocation of the capacity necessary for defective code correction in a pre-production environment.	The Monitoring and Reporting Post Release Capacity Utilization Report dated February 15, 2004, accurately reports, by category (i.e. maintenance, defects, etc.), the number of units dedicated to Change Requests for 2003 as received by BellSouth from its vendors based on the criteria below [see the entire assertions page].