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February 16, 2004

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No.: 031072-TL

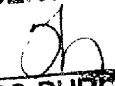
Dear Ms. Bayo:

On behalf of AT&T Communications of the Southern States, LLC, DIECA Communications, Inc. d/b/a Covad Communications Company, ITC^DeltaCom Communications, Inc., MCI metro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively MCI), and Network Telephone Corporation (hereinafter CLEC Coalition), enclosed for filing and distribution are the original and 15 copies of the following:

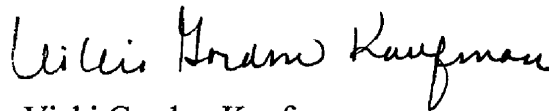
- ▶ CLEC Coalition's Comments on BellSouth Telecommunications, Inc.'s Notice of Filing.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

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Sincerely,



Vicki Gordon Kaufman

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DOCUMENT NUMBER-DA

02162 FEB 16 2004

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of CLEC Coalition
To Develop a Process to Evaluate
BellSouth Telecommunications,
Inc.'s Compliance with the
50/50 Plan, a Portion of the
Change Management Process.

Docket No. 031072-TL

Filed: February 16, 2004

**CLEC COALITION'S COMMENTS ON
BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF FILING**

AT&T Communications of the Southern States, LLC, DIECA Communications, Inc. d/b/a Covad Communications Company, ITC^DeltaCom Communications, Inc., MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively, MCI), and Network Telephone Corporation (hereinafter CLEC Coalition), file these comments in regard to BellSouth Telecommunications Inc.'s (BellSouth) Notice of Filing on February 6, 2004.

1. On November 21, 2003, the CLEC Coalition filed a petition requesting that the Commission develop a process to ensure BellSouth's compliance with the "50/50 plan" and specifically requested that the Commission require an "open" audit of the change management process which includes full participation by the Commission, Commission Staff, the CLEC Coalition and any other interested parties.

2. On January 27, 2004, the Staff conducted an informal meeting among the parties and auditors to discuss the CLEC Coalition's concerns.

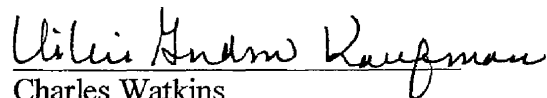
3. The CLEC Coalition made a detailed presentation and provided a hand out, which is attached hereto as Attachment 1, setting forth in detail the concerns it has with the current audit process as well as suggested changes to address such concerns.

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4. At the meeting, BellSouth explained that it had "amended" the audit attestations and that the issues the CLEC Coalition had raised were addressed by these additional attestations. BellSouth committed to provide the additional attestations and explain how they resolved the CLEC Coalition's concerns. On February 6, 2004, BellSouth made a "Notice of Filing", consisting of a matrix.

5. The matrix BellSouth filed does not address the detailed concerns raised by the CLEC Coalition nor does it demonstrate what additional attestations have been required of the auditors nor how such attestations are responsive to the CLEC Coalition's petition and presentation in this docket. For example, many of the items noted by BellSouth simply refer to actions from July 2003. In addition, though the CLEC Coalition thought there was agreement to solicit CLEC input into the audit process, no mention of that is made in the BellSouth filing.

6. In short, the filing BellSouth has made does not address the issues raised by the CLEC Coalition in this docket.



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CERTIFICATE OF SERVICE

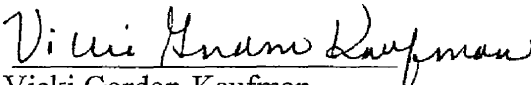
I **HEREBY CERTIFY** that a true and correct copy of the foregoing CLEC Coalition's Comments on BellSouth's Notice of Filing has been provided by (*) hand delivery and U.S. Mail this 16th day of February 2004, to the following:

(*) Felicia Banks
Division of Legal Services
Florida Public Service Commission
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Nancy White
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Vicki Gordon-Kaufman

Objective of 50/50 Review Process

- Assess if the 50/50 capacity sharing process has effectively reduced the backlog of defects.
- Determine how to evaluate the integrity of the 50/50 process.
- Assess if BellSouth has allocated sizing units based on a fair representation of all OSS work items.

CLEC Recommendations

- 50/50 Capacity Assessment should be expanded to include:
 - Review 50/50 allocation on a quarterly basis
 - Use data on work completed during the quarter
 - Utilize data from BellSouth's internal programmers tracking tool rather than Change Requests data base.

CLEC Recommendations

- Assess if BellSouth is correctly classifying the following:
 - Change Requests
 - Maintenance Items: request that all maintenance items be provided to CCP via Change Requests so they can be documented, prioritized and tracked.

CLEC Recommendations

- Verify that the 50/50 Process is working to accomplish over all goal.....reduce defects.
 - % Defect Reduction
 - % Defects corrected within acceptable timeframe
 - CLEC Examples



CLEC Recommendations

- Review quality of Release Management
 - Determine % specs match coding
 - Review if specs/coding discrepancies are documented and correctly managed for resolution during testing process
 - Type 6 Defects should come from BellSouth units as the CLECs are unfairly penalized by BellSouth's quality problems.

CLEC Recommendations

- Assess the sizing process to determine the following:
 - Verify if different programmers, systems, and interfaces are identified
 - Verify how the units are assigned to programmers, systems, and interfaces when they are different.
 - Verify if the sizing established can be mapped to the actual work effort in the BST Tracking Tool.