

State of Florida



Public Service Commission  
-M-E-M-O-R-A-N-D-U-M-

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**DATE:** July 25, 2002  
**TO:** Division of Commission Clerk and Administrative Services  
**FROM:** Lisa S. Harvey, Chief of Regulatory Review, Division of Competitive Markets & Enforcement  
**RE:** Filing in Docket No. 000121A-TP

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Please place the attached letter in the record for Docket No. 000121A-TP. The descriptive title should read "Performance Measures Change Notification Process."

LSH/bjm

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DIVISION OF COMPETITIVE MARKETS &  
ENFORCEMENT  
WALTER D'HAESELEER  
DIRECTOR  
(850) 413-6600

## Public Service Commission

July 17, 2002

Mr. Marshall Criser  
BellSouth Telecommunications, Inc.  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301-1556

Mr. Criser:

It has come to my attention that BellSouth is implementing certain changes to its method of calculating performance measurements. Staff is concerned that these changes may be contrary to the business rules and calculations described in Order No. PSC-01-1819-FOF-TP. The order established the process by which all changes would be made during the six-month review cycle. Please explain why BellSouth is making changes prior to the review cycle without Commission approval.

Staff suggests that if BellSouth believes it is necessary to make changes to the measures methodology prior to the six-month review cycle, BellSouth should propose a notification process. This process would advise the Commission and parties to Docket No. 000121A in advance of any such changes and provide for review and input on any proposed changes. Under no circumstances should BellSouth change any established metric or benchmark prior to the six-month review process without approval of the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa S. Harvey".

Lisa S. Harvey  
Chief, Bureau of Regulatory Review

LSH:bjm

cc: Walter D'Haeseleer  
Beth Salak  
Bob Trapp  
Jason Fudge  
Carl Vinson  
Jerry Hallenstein  
Mary Rose Siriani