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October 30, 2002

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: *Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale*; Docket No. 000121A-TP

Dear Mrs. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Flow-Through Improvement Plan Progress Report for filing to comply with the Florida Public Service Commission's Order dated July 30, 2002.

I enclose the original and 15 copies for filing, along with an extra copy of this letter which I would appreciate your stamping "Filed" and returning to me. Thank you for your assistance in this matter.

Yours very truly,

Lisa S. Foshee
(LAF)

Enclosures

cc: All Parties of Record
Marshall M. Criser III

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CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U. S. Mail this 30th day of October, 2002 to the following:

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**(+) Signed Protective
Agreement**

#237366

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Investigation into the establishment)	Docket No. 000121A-TP
Of Operations Support Systems Permanent)	
Performance Measures for Incumbent)	
Local Exchange Telecommunications Companies)	
<hr/>		Filed: October 30, 2002

**BELLSOUTH'S FLOW-THROUGH IMPROVEMENT PLAN
PROGRESS REPORT**

OVERVIEW

In its Performance Metrics Order, the Florida Public Service Commission (“Commission”) ordered BellSouth to file a Flow-Through improvement plan by July 30, 2002 on how it intends to achieve the Service Quality Measure Flow-through benchmarks and show significant improvement in 2002. The Commission opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of Operations Support Systems (“OSS”) provided for Alternative Local Exchange Carriers’ (“ALECs”) use by Incumbent Local Exchange Carriers (“ILECs”). Associated with the performance metrics is a monitoring and enforcement program that is to ensure that ALECs receive nondiscriminatory access to the ILEC’s OSS.

Pursuant to its commitment in BellSouth's July 30, 2002 filing, BellSouth now files its status update to the Commission. In this report, BellSouth provides the Commission with performance updates in the categories outlined in its original plan report (actual and projected results), as well as the status of the implementation of flow-through improvement items. The Commission will see – based upon BellSouth's most recent commercial data (July, August and preliminary September 2002) – that BellSouth's OSS continues to demonstrate high – and improving – overall flow-through capability.

As in BellSouth's initial report, ALECs that submit large numbers of requests continue to maintain high flow-through rates. The chart below revises the initial report’s

view of the top 5 ALECs by electronic LSR volume. The data covers the entire region and reflects activity that took place during September of 2002 (compared to March 2002). Note that for five ALECs, the flow-through rates for 4 out of the 5 exceeds 90% with preliminary results posted for September 2002. The 5th ALEC has a percent flow through rate of 87.1% with preliminary results posted for September 2002, which is an 11.4% increase over March 2002. The percent flow through rate for this 5th ALEC increased even with a 49% increase in LSR volume.

ALEC	Total Mech. LSR March 2002	% Flow-Through March 2002	Total Mech. LSR Prelim. Sept. 2002	% Flow-Through Prelim. Sept. 2002
A	75,453	75.5%	21,659	90.0%
B	45,237	75.7%	67,470	87.1%
C	41,891	89.9%	100,808	92.1%
D	24,112	94.2%	27,814	93.1%
E	14,948	94.3%	16,036	93.0%

Flow-through rates for individual competing carriers can vary, and the FCC has also recognized “that BellSouth's ability to flow through orders at high rates is dependent, in part, on the ability of the competing carriers.” GALA Order, ¶ 145. Further, in its most recent order granting BellSouth 271 approval, the Commission affirmed its earlier Georgia/Louisiana ruling with virtually the same words. 5-State Order ¶ 152.

An analysis of the preliminary September 2002 Percent Flow-Through Service Requests (Aggregate Detail) report reveals that 286 users experienced a flow-through rate in excess of 90% (up from 246 in March 2002). Of significant note, 48 of these users (up from 39 in March 2002) electronically submitted in excess of 1,000 LSRs, and 112 more users (up from 80 in March 2002) submitted between 100 and 999 LSRs. The increasing number of ALECs experiencing higher flow-through rates – compared to the number in March 2002 – continues to demonstrate that BellSouth is providing ALECs with electronic interfaces capable of accepting flow-through-eligible requests.

**BELLSOUTH'S REPORT ON PROPOSED FLOW-THROUGH
IMPROVEMENT PLAN**

Flow-Through Task Force and Other Flow-through Improvement Efforts

The Flow-Through Improvement List (Attachment 1) identifies those flow-through improvement features, errors, and defects that have already been implemented through Release 10.6. A total of thirty-five items have been implemented through Release 10.6, implemented on August 25, 2002.

BellSouth did undertake an additional project (summarized below) to further improve flow-through rates for Residential Resale, Business Resale, UNE, and LNP segments to benchmarks established by this Commission. According to the Florida Interim Service Quality Measurement Plan, Version 3.0 dated June 2, 2001, the benchmarks for the segments of Percent Flow-Through Service Requests are:

SQM Flow-Through Segments	Benchmarks
Residence Resale	95%
Business Resale	90%
Unbundled Network Elements (UNE)	85%
Local Number Portability (LNP)	85%

The guidelines for this additional project are as follows:

1. This project is focusing solely on reducing or eliminating items classified as "BST errors" in the current flow-through reporting process. BST errors are errors that require manual review by the LCSC due to BellSouth system functionality. In other words, the ALEC orders are accepted by the BellSouth OSS and then the orders fall out for BST manual intervention. This fall out is categorized into Error Buckets or Error Codes. BST is focusing on these BST errors for this project.

2. This project has added information technology resources, over and above those currently designated for the ALEC OSS projects, and does not affect the capacity already identified for the 2002 and 2003 release schedule, as published and shared through the Change Control Process (“CCP”).

3. BellSouth is following the CCP Document and has opened Type 6 change requests as identified for improvement purposes. A description of the CCP Document is outlined in the Change Control Process Document located at: http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/ccp_bccp_guide.pdf

These Type 6 change requests are being implemented during the system maintenance windows as point releases and are tied to the existing release schedule. These corrections are not available for testing in CAVE since they require no change on the part of the ALEC, and affect only orders currently being processed as BST errors.

4. The flow-through improvement plan outlined is focusing on the Local Exchange Service Order Generator (“LESOG”) application. BellSouth has performed an analysis of the top error codes impacting flow-through and identified flow-through errors that are isolated to the LESOG application. Other systems may be impacted with future maintenance releases. Implementation began mid-August 2002.

Included in the flow-through improvement project plan on the following page is the estimated time-line for each of the flow-through segments, showing current performance, and expected improvements.

FLOW-THROUGH IMPROVEMENT PROJECTION

Category	Residence Resale		Business Resale		UNE		LNP	
Benchmark	95%		90%		85%		85%	
Actual/ Projected Performance	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected
Apr 02	87.32		71.85		84.54		92.60	
May 02	86.74		69.54		82.68		89.80	
Jun 02	88.58		73.74		83.84		83.63	
Jul 02	87.70		73.23		89.13		88.50	
Aug 02	89.52		76.17		87.94		88.09	
Sep 02 *	90.20		77.80		89.80		88.81	
Oct 02	XX	90.40	XX	78.60	XX	90.50	XX	87.00
Nov 02	XX	92.50	XX	80.40	XX	91.07	XX	87.00
Dec 02	XX	92.50	XX	80.40	XX	91.07	XX	87.00
Jan 03	XX	92.90	XX	81.00	XX	91.20	XX	87.00
Feb 03	XX	93.10	XX	81.80	XX	92.00	XX	87.00

*** September figures are preliminary.**

BellSouth has implemented Flow-through Improvement Packages 1 (August 25, 2002) and 2 (October 13, 2002), and has targeted implementation of Package 3 for January 26, 2003. BellSouth met and exceeded – ahead of its original projections – flow-through percentages in several of the categories above, primarily due to an accelerated implementation (within Packages 1 and 2) of corrections of certain high-volume errors that were originally scheduled for a later release.

The leveling-off of the projections in no way indicates any lack of focus on continued flow-through improvement by BellSouth; rather, it is due to the fact that further results improvements become increasingly difficult to produce. Most of the large-impact items will have been implemented by then, leaving only low-volume errors that, when corrected, yield only tenths-of-percentage points improvement.

Provided in the following analysis is a more detailed assessment of the flow-through improvement plan by each segment:

UNE

BellSouth met the Percent Flow-Through UNE benchmark of 85% with July, August and preliminary September flow-through results. This is particularly important because the UNE segment comprises approximately 55.6% of total mechanized LSR volume in the preliminary results reported for September 2002.

Residence Resale

BellSouth expects to demonstrate noticeable progress toward meeting the Percent Flow-Through Residence benchmark of 95% with projected flow-through results of 93% with February 2003 results. However, based on early projections, the additional 2% needed to meet this benchmark is not expected until fourth quarter of 2003. The flow-through improvement needed in the residence segment requires that BellSouth fix a large number of error codes with low LSR volume to realize a 2% flow-through improvement. The residence segment comprises approximately 39.2% of total mechanized LSR volume in the preliminary results reported for September 2002.

Business Resale

BellSouth expects to continue to make progress toward meeting the Percent Flow-Through Business benchmark of 90%. However, BellSouth's assessment of the flow-through data in this segment reveals that BellSouth will be unable to attain a 90% benchmark. The complexity and relative small volumes of numerous different error types associated with this segment does not allow for many significant improvement opportunities to realize significant flow-through improvement. While BellSouth is committed to improving flow-through in each segment, this segment's complexity coupled with its low volume makes it difficult to realize significant flow-through improvement beyond about 82%. The business segment now comprises only 1.6% of total mechanized LSR volume in the preliminary results reported for September 2002.

LNP

BellSouth has met or exceeded the flow-through benchmark of 85% eleven out of the last 12 months. Preliminary September 2002 LNP Percent Flow-through is 88.81%. Prior to this Commission's Order to implement facilities check before firm order confirmation ("FOC"), BellSouth consistently met the SQM benchmark. LNP Percent Flow-through dropped from 89.8% in May 2002 to 83.63% in June 2002.¹ The facilities check before FOC was implemented with Release 10.5 on June 1, 2002, which caused a negative impact on LNP flow-through as explained in BellSouth's July 30, 2002 filing.

The LNP segment comprises approximately 3.6% of total mechanized LSR volume in the preliminary results reported for September 2002. BellSouth has met the LNP flow-through benchmark for July, August and (preliminary) September 2002 due to the decrease in ReqType B (Loop + LNP) LSRs.

Conclusion

To comply with this Commission's Order, BellSouth plans to continue taking the steps outlined in this plan to demonstrate further progress toward meeting the flow-through benchmarks.

¹ In fact, one Florida ALEC's flow-through rate dropped from 78% to 11% in June after facility check before a FOC was implemented.

BellSouth OSS Flow Through Improvement Features, Defects, and Errors

Release Number	Release Date	Description
9.2.1	06/02/2001	Do not populate RTX on service orders (FTTF-30)
10.2	11/03/2001	Correct Format of CCON on UNE-P conversion orders (FTTF-29)
10.3	01/05/2002	Line Splitting (FTTF-14)
10.3.1	02/02/2002	Directory Delivery Quantity (DIRQTYA) when REQTYPE = M
10.3.1	02/02/2002	Enhancements to Hunting (CCP Feature CR0606)
10.3.1	02/02/2002	Validation on TN vs. Address REQTYPEs A and E (CCP Feature CR0371)
10.3.1	02/02/2002	Allow electronic process of UDC Loop Orders (FTTF-01)
10.4	03/23/2002	Ability to order or disconnect listings (REQTYPE J) in LENS (CCP Feature CR0096)
10.4	03/23/2002	Due Date Calculations for Denials and Restorals (TCIF 9)
10.4	03/23/2002	Allow Local Service Freeze (LSF) on REQTYPE M (TCIF 9) (CCP Feature CR0657)
10.4	03/23/2002	Partial Migrations of REQTYPE CB, Activity P & Q (FTTF-17)
10.5	06/02/2002	Mechanization of the Universal Digital Channel (UDC) (FTTF-01)
10.5	06/02/2002	Implement Enhanced Extended LINKS (EELS) (FTTF-15)
10.5	06/02/2002	Change Main Account Number (FTTF-26)
10.5	06/02/2002	LSRs in Q status - Do Not Display Error Message on SUPP (FTTF-24)
10.5	06/02/2002	Correct SOER error (YPH Lists 010), Directory List Headers UNE-P (CCP Defect CR0741)
10.5	06/02/2002	Correct SOER error (RCYC 009), relating to ring cycle (CCP Defect CR0740)
10.5	06/02/2002	Correct SOER error (PIC and LPIC), REQTYPEs E and M
10.5	06/02/2002	Correct SOER error (DIR009) and populate a 5-digit zip code
10.5	06/02/2002	Correct SOER error (ZLIG 013) (CCP Defect CR0682)
10.5	06/02/2002	Correct SOER error (Format SAE 996) (CCP Defect CR0682)
10.5	06/02/2002	Correct SOER error (DNTD SAE 009) (CCP Defect CR0682)
10.5	06/02/2002	Correct SOER error (Format 001 FID ISF) Invalid for Bill Section (CCP Defect CR0739)
10.5	06/02/2002	Correct SOER error (Format 001 FID OISF) Invalid for Bill Section (CCP Defect CR0739)
10.5	06/02/2002	Correct SOER error (ADV Bill 004) Invalid for order type/Bill Section (CCP Defect CR0739)
10.5	06/02/2002	Correct SOER error (LUD Bill 004) Invalid for order type/Bill Section (CCP Defect CR0739)
10.5	06/02/2002	Correct SOER error (OCD Bill 004) Invalid for order type/Bill Section (CCP Defect CR0739)
10.5	06/02/2002	Correct SOER error (NOB Bill 004) Invalid for order type/Bill Section (CCP Defect CR0739)
10.5	06/02/2002	Correct SOER error (ZPK Bill 004) Invalid for order type/Bill Section (CCP Defect CR0739)
10.5	06/02/2002	Make additions to UNE-P Strip List to include SPP (Special Pricing Plan) (FTTF-05)(CCP Defect CR0739)
10.5	06/02/2002	Correct SOER error (PKG SAE 010) PKG USOC invalid on N order (UNE-P) (CCP Defect CR0739)
10.6	08/25/02	Partial Migrations of UNE Loops (Req A) (FTTF-13)
10.6	08/25/02	Partial Migrations of Req BB, Act P&Q (FTTF-18)
10.6	08/25/02	Denials/Restorals on Converted/Disconnected Accounts (FTTF-05)
10.6	08/25/02	Mechanization of UCL-Non Designed (FTTF-11)

Note: (FTTF) indicates an item initiated by the Flow-Through Task Force