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January 9, 2003

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
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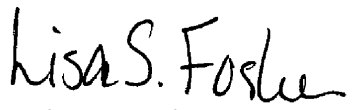
RE: FPSC Docket No. 000121A-TP

Dear Mrs. Bayo:

Enclosed is BellSouth Telecommunications, Inc.'s letter providing responses to concerns raised about several changes that were proposed at the Data Notification workshop held on December 6, 2002 in the above-referenced docket.

I have enclosed 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.

Sincerely,


Lisa S. Foshee (LA)

Enclosures

cc: All Parties of Record
Marshall M. Criser III

DOCUMENT NUMBER-DATE

00310 JAN-98

FPSC-COMMISSION CLERK

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 9th day of January, 2003 to the following:

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**(+) Signed Protective
Agreement**

#237366

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December 17, 2002

DELIVERED BY HAND

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

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's
Operations Support Systems*; Docket No. 8354-U

*Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale*; Docket No. 7892-U

Dear Mr. McAlister:

At the Data Notification workshop held on December 6, 2002, concerns were raised about several changes proposed by BellSouth Telecommunications, Inc. ("BellSouth") to which would like to respond as follows:

January Data Notification / Third-Party Testing / Item 5 – Clarify the change being proposed and confirm that the change is consistent with the Service Quality Measurement ("SQM") Plan.

Response – This item addresses an issue for retail and wholesale data identified by BearingPoint's PMR-5 test for the "Provisioning: Troubles Within 30 Days of Service Order Completion" SQM Report. Currently, PMAP is erroneously calculating the results of this measure for trunks. The issue is best illustrated by an example using a trunk service order ("SO") with 50 trunks on the order. If there is a trouble on one or multiple individual trunks on the SO, then all 50 trunks are currently counted as trouble reports in the numerator of the calculation, while 1 SO is being captured in the denominator. This leads to a result of 5000% (50 trunks ÷ 1 SO), which is inconsistent with the business rules in the SQM for this measure. The result of the measure should never exceed 100% since the

business rules clearly state that only the first trouble report is counted, and not any subsequent reports. BellSouth proposed a change (RQ1620) to address this problem that involved changing the denominator to count equivalent service orders. Using the example above, the numerator would remain at 50 and the denominator would be increased from 1 to 50, which would lead to the correct result of 100% (50 trunks ÷ 50 SO equivalents). Because of the concern expressed by several parties on the December 6, 2002 industry call, BellSouth agreed to delay implementing this change until the parties could discuss the matter with BearingPoint. Based on subsequent conversations with the parties, BearingPoint, and Commission staff, BellSouth has decided not to implement the proposed change. Instead, BellSouth will propose to correct the calculation of this measure by measuring the number of service orders with trouble reports divided by the number of service orders, which would ensure that the calculation methodology for trunks mirrors the calculation methodology for non-trunks. This proposed correction will be included in a future data notification. In the meantime, BellSouth will continue the current method of reporting data for this measure.

February Data Notification / Maintenance and Repair Measurements / Item 12 – Clarify the change being proposed.

Response – In LMOS there are three dates associated with trouble reports that relate to this measure: received date, cleared date, and closed date. The received date is the date the trouble report was received, the cleared date is the date the technician corrected the trouble condition and closes the report, and the closed date is the time that the data center processor is updated. Since the inception of this measure, BellSouth has been calculating performance results based on the cleared date. However, incorrect coding was introduced in connection with a prior PMAP change (Item 10 on BellSouth's June 2002 Data Notification), which caused the closed date to be used incorrectly in calculating performance results. For some customers located in a different time zone from the LMOS data processor, it is possible to have a closed date and time stamp earlier than the cleared date and time stamp, which results in a missed repeat report. The change BellSouth is proposing would restore use of the cleared date in calculating results.

February Data Notification / Maintenance and Repair Measurements / Item 14 – Clarify the change being proposed.

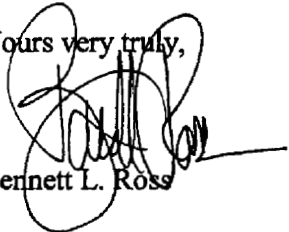
Response – Currently, for WFA tickets in PMAP, the interval to determine whether a repeat trouble occurs is calculated from date the first trouble is received

Mr. Reece McAlister
December 17, 2002
Page 3

to the date when the second trouble ticket is resolved. It should be calculated from the date the first trouble ticket is resolved to the date the second trouble report is received. Consequently, the numbers of repeat troubles for retail and wholesale are slightly understated. The change BellSouth is proposing would correct this situation.

Enclosed please find an original and eighteen (18) copies of this letter, as well as an electronic version, for filing. I would appreciate your returning the three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Yours very truly,



Bennett L. Ross

BLR:nvd

cc: Mr. Leon Bowles (via electronic mail)
Parties of Record (via electronic mail)

473087

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8354-U/7892-U

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