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March 28, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director
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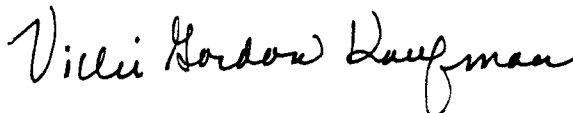
Re: Docket No.: 000121A-TP

Dear Ms. Bayo:

Enclosed for filing are the original and 15 copies of the filing of DIECA Communications, Inc. d/b/a Covad Communications Company in Georgia related to BellSouth's proposed and preliminary PMAP changes. We specifically call your attention to Item 13 which is directly applicable to Florida.

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

Sincerely,



Vicki Gordon Kaufman

VGK/bae
Enclosure
cc: Parties of Record

DOCUMENT NUMBER-DATE

02925 MAR 28 8
McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN & ARNOOLD, P.A.

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Georgia PMAP Comments has been furnished by (*) Hand Delivery or U.S. Mail this 28th day of March, 2003:

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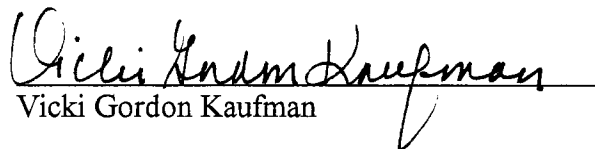
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March 21, 2003

VIA HAND DELIVERY

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

**In Re: Performance Measurements for Telecommunications, Interconnection,
Unbundling and Resale (Docket # 7892-U)**

Dear Mr. McAlister:

Covad is filing its Comments Concerning BellSouth's Proposed April 2003 and Preliminary May 2003 Notification Report Regarding PMAP Changes consistent with this Commission's July 19, 2002 Order. These PMAP changes were discussed on the March 7, 2003 industry conference call.

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

Thank you in advance for your attention to this matter. Please do not hesitate to contact me if you have any questions concerning this matter.

Sincerely,

Charles E. Watkins
Senior Counsel

CEW/jlb

cc: Parties of Record

Mr. Leon Bowles (w/enclosure) – via electronic mail

Mr. Patrick Reinhardt (w/ enclosure) – via electronic mail

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)
)
Performance Measurements for) Docket No. 7892-U
Telecommunications Interconnection,)
Unbundling and Resale)
_____)

COVAD'S COMMENTS CONCERNING
BELLSOUTH'S PROPOSED APRIL 2003 AND
PRELIMINARY MAY 2003 NOTIFICATION REPORT
REGARDING PMAP CHANGES

Comes now DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") and respectfully files these comments concerning Item 15 of the Proposed April 2003 Data Notification and Items 13 and 14 of the Preliminary May 2003 Data Notification, which BellSouth Telecommunications, Inc. ("BellSouth") filed with this Commission on March 3, 2003.

1. BELLSOUTH'S PROPOSED APRIL 2003 PMAP CHANGES

Item 15 – Affected Measures: P-9 (Louisiana Only)

Description of Change: BellSouth is producing Percent Provisioning Troubles within 30 Days and Percent Provisioning Troubles within 5 Days for Louisiana in SQM reports. Because the Louisiana SQM does not require the former report, BellSouth proposes to eliminate it from the Louisiana posting. This proposed change was Item (12) on the Preliminary April 2003 Data Notification filed on February 3, 2003. (RQ2407).

Covad's Comments: BellSouth proposes to stop posting the Percent Provisioning Troubles within 30 Days report in Louisiana because the current SQM only requires that troubles within 5 days of provisioning be reported at this time. Only the Louisiana

SQM deviated from the standard and required BellSouth to report the percentage of provisioning troubles within 5 days of loop installation rather than within 30 days as do all other state SQMs in the BellSouth region. The Louisiana Public Service Commission is currently reviewing this metric in the Service Quality Measurements 6-Month Review in Docket No. U-22252, Subdocket C. In comments filed October 16, 2002 in the Service Quality Measurement docket in Louisiana, Covad asserted that 5 days is not a long enough interval for data CLECs to complete their dispatch to the end user's premises. No decision has been rendered by the Louisiana Public Service Commission in response to Covad's comments. However, reporting troubles within 5 days of provisioning is virtually meaningless for data CLECs like Covad. It is unlikely that provisioning troubles will be uncovered in that short amount of time. As such, BellSouth's performance for this measure cannot accurately reflect the quality of its installations, as is the intention of this measure. It is Covad's position that BellSouth is not harmed by continuing to post this report since they have been doing so for some time now. For the reasons stated above, Covad requests that this Commission require BellSouth to continue reporting the percentage of provisioning troubles within 30 days in Louisiana at least until such time as the issue is decided by the Louisiana Commission.

2. BELLSOUTH'S PRELIMINARY MAY 2003 PMAP CHANGES

Item 13 – Affected Measures: P-3A (Florida and Tennessee Only)

Description of Change: Currently, the CLEC SQM reports list separate data for CLEC caused Missed Appointments. Because CLEC caused Missed Appointments should not be reported separately, BellSouth proposes removing this data from the report. (RQ2423)

Item 14 – Affected Measures: P-3 (Louisiana Only)

Description of Change: For wholesale and retail results, End User Caused Misses are being included in this measure. Because the SQM requires that only BellSouth caused Missed Appointments be included, BellSouth proposes a coding change to correct this problem. In addition, a total Missed Appointments column needs to be added to the report. (RQ2424)

Covad's Comments: BellSouth wishes to discontinue posting data for End User Missed Appointments for the Percent Missed Installation Appointments Including Subsequent Appointments measure in Florida and Tennessee, as well as for the Percent Missed Installation Appointments measure in Louisiana on the basis that it is not required to do so under the SQM plans in those states. This means that not only would the PMAP reports not contain this data but also that the excluded data would not be available in the raw data files supporting the PMAP report for this measure. It is imperative that the CLECs be able to validate whether BellSouth has correctly identified End User Missed Appointments. Covad requests that for P-3A in Florida and Tennessee and for P-3 in Louisiana, this Commission require BellSouth to include all excluded orders in the Other Supporting Data Files (OSDF) in PMAP. These OSDF files should be available for review and to download from the PMAP website in the same manner as are the raw data files.

Respectfully submitted this 21st day of March, 2003.



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CERTIFICATE OF SERVICE

Docket No. 7892-U

I hereby certify that on March 21, 2003, I served copies of the foregoing document upon the parties of record, either via electronic mail or by depositing same in the United States Mail, with adequate postage thereon, addressed as follows:

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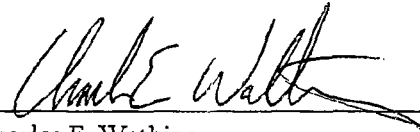
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This 21st day of March, 2003.

A handwritten signature in black ink, appearing to read "Charles E. Watkins", written over a horizontal line.

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