

ORIGINAL

Legal Department

J. Phillip Carver
Senior Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

February 26, 2004

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket No. 031072-TL

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Notice of Filing Additional Assertions of BellSouth Telecommunications, Inc., which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver
J. Phillip Carver *ret*

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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**CERTIFICATE OF SERVICE
DOCKET NO. 031072-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 26th day of February, 2004 to the following:

Felicia Banks
Jeremy Susac
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No.: 850 413-6216
fbanks@psc.state.fl.us
jsusac@psc.state.fl.us

Charles Watkins
Covad Communications Company
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3492
Fax. No. (404) 942-3495
gwatkins@covad.com

Vicki Gordon-Kaufman
McWhirter Reeves McGlothlin
Davidson Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
vkaufman@mac-law.com
Represents Covad

Tracy Hatch
AT&T Communications of the
Southern States, LLC
101 North Monroe Street, Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361
thatch@att.com

Donna McNulty
MCI WorldCom, Inc.
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mcnulty@wcom.com

Nanette S. Edwards
Director-Regulatory
ITC^DeltaCom Communications, Inc.
4092 South Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
Fax. No. (256) 382-3936
nedwards@itcdeltacom.com

Joseph A. McGlothlin
McWhirter Reeves McGlothlin
Davidson Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
jmcglothlin@mac-law.com
Represents Network Tel. Corp.



J/Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of CLEC Coalition)
To Develop a Process to Evaluate) Docket No. 031072-TL
BellSouth Telecommunications, Inc.'s)
Compliance with the 50/50 Plan, a) Filed: February 26, 2004
Portion of the Change Management)
Process.)

BELLSOUTH'S NOTICE OF FILING ADDITIONAL ASSERTIONS

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this Notice of Filing Additional Assertions, and states the following:

1. During the informal meeting held in this proceeding on January 27, 2004, the Florida Public Service Commission Staff ("Staff") requested that BellSouth file an explanation of how the more recent BellSouth assertions address the issues raised in the CLECs' Petition. On February 6, 2004 BellSouth filed a matrix for this purpose. Although the Staff did not request any additional commentary by any parties on this matrix, the CLECs filed Comments on February 16, 2004. In this filing, the CLECs complain, in part, that the additional assertions¹ were not included with BellSouth's first filing. This complaint is puzzling, given the fact that BellSouth has already provided these additional assertions to these CLECs in the context of an ongoing proceeding in Georgia. To the best of BellSouth's knowledge, each member of the CLEC Coalition has the additional assertions in their possession. Nevertheless, BellSouth hereby formally files these assertions herein, so that they will be a part of the record in this proceeding. (The assertions are attached as Exhibits A and B)

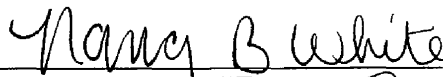
2. Beyond this, the CLECs claim in their unauthorized Comments that the matrix does not establish that the assertions addressed the CLECs' concerns. BellSouth will not

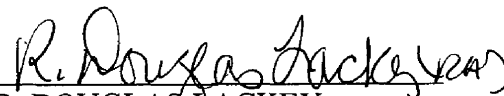
¹ The CLECs' Comments erroneously refer to BellSouth's assertions as "attestations". In the verification process, BellSouth makes assertions, and the third party reviewing the assertions would make an attestation as to the validity of the assertions.

respond at length here to this contention by, in effect, filing an unauthorized Reply to the CLECs unauthorized Comments. It will suffice to say that BellSouth believes that these assertions address any legitimate concerns that the CLECs might have regarding the third party verification process. The CLECs' issues were also specifically addressed at the meeting by the explanation given by PwC of the process that it follows, and the fact that PwC does intend to seek input, as appropriate, from the CLECs.

Respectfully submitted this 26th day of February 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.


NANCY B. WHITE (PwC)
Museum Tower
150 West Flagler Street
Suite 1910
Miami, Florida 33130


R. DOUGLAS LACKEY
J. PHILLIP CARVER
General Attorneys
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375
(404) 335-0710

528881

Report of Management Assertions on BellSouth Telecommunication's Change Control Appendix I Reporting

Management of BellSouth Telecommunications (BellSouth) asserts that:

- The Monitoring and Reporting Post Release Capacity Utilization Report included as Attachment A, dated February 15, 2004, accurately reports, by category (i.e., **maintenance, defects, etc.**), the number of units dedicated to Change Requests (CR) for 2003 as received by BellSouth from its vendors based on the criteria below, and that
- At least 50% of the total Post Release Development Units for Type IV and V Change Requests, per the Monitoring and Reporting Post Release Capacity Utilization Report for 2003, have been reported as CLEC Change Requests (Type V) for 2003, and that
- **BellSouth maintains internal controls over the process of accepting features and defect Change Request hours from vendors through to the creation of The Monitoring and Reporting Post Release Capacity Utilization Report, dated February 15, 2004, that are designed to provide reasonable assurance regarding the accurate preparation of The Monitoring and Reporting Post Release Capacity Utilization Report.**

The following describes the terms "accurately" and "units" and "Internal Controls" criteria:

Monitoring and Reporting Post Release Capacity Utilization Report Accuracy

BellSouth Management asserts that the Monitoring and Reporting Post Release Capacity Utilization Report accurately reports the category and number of units dedicated to the Change Requests for the first quarter 2003. As it relates to this assertion, "accurately" will be assessed according to the following processes:

- Accepting features and defects Change Request hours from BellSouth's vendors,
- Converting Change Request hours to Change Request units,
- Assigning Change Request units by Change Request category (i.e., **maintenance, defects, etc.**), and
- Summarizing units by Change Request category for inclusion in the Monitoring and Reporting Post Release Capacity Utilization Report.

As it relates to this assertion, "units" is defined as:

A unit is equal to 100 Change Request Development and Testing labor hours dedicated to Change Requests per the BellSouth Change Control Process Guide, dated August 26, 2003.

As it relates to this assertion, "internal controls" are defined as:

Internal Controls are described in the Internal Control – Integrated Framework issued by the Committee of Sponsoring Organizations of the Treadway Commission.

William Stacy
Operations Vice President

BellSouth Telecommunications, Inc.
675 West Peachtree Street, N E
Atlanta, GA 30375

***Report of Management Assertions on BellSouth Telecommunication's Change
Control Appendix I-A Reporting***

The Management of BellSouth Telecommunications (BellSouth) asserts the following on unit sizing:

- The unit sizing determined for all CR types is and has been performed since July 2003 with a consistent, documented methodology common to all vendors and systems included within the scope of the CCP as stated in the process guide.
- Since July 2003, a documented process has been consistently followed to monitor the accuracy of unit sizing, in both projected estimates and actual release implementation for CRs.

William Stacy
Operations Vice President