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December 20, 2004

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: Docket No. 000121A-TP
**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

Please find enclosed for filing BellSouth's Proposed Notification Report for the December 2004 data month and a Preliminary Notification Report for the data month of January 2005. A copy of the same is being served on all parties of record.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record
Marshall M. Criser, III
Nancy B. White
R. Douglas Lackey

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

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

Electronic Mail and U.S. Mail this 20th day of December, 2004 to the following:

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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166



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November 1, 2004

DELIVERED BY HAND

Mr. Reece McAlister
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244 Washington Street, S.W.
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RECEIVED

NOV 01 2004

EXECUTIVE SECRETARY
G.P.S.C.

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

Dear Mr. McAlister:

Consistent with the Commission's July 19, 2002 Order, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Proposed Notification Report for the December 2004 data month and a Preliminary Notification Report for the data month of January 2005. These proposed changes will be discussed at the November 5, 2004 industry conference call.

In its November 2004 Data Notification filed on October 1, 2004 (Item No. 1), BellSouth provided notice of its proposal to exclude CSR and RSAG time from the DSAP duration. Although BellSouth expected to implement this change with November 2004 data, the change will not be fully implemented until January 2005 data.

Enclosed herein, please find an original and seventeen (17) copies, as well as an electronic version, of these Data Notification Reports. I would appreciate your filing same in the above-referenced docket and returning the two (2) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your attention to this matter.

Yours very truly,

Lisa S. Foshee

LSF:nvd
Enclosures

Mr. Reece McAlister
November 1, 2004
Page Two

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)
Mr. Patrick Reinhardt (w/enclosure) (via electronic mail)
Parties of Record (w/enclosure) (via electronic mail)

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PROPOSED DECEMBER 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the December 2004 data month. Results for the December 2004 data month will be posted as follows:

Preliminary results January 20, 2005
Final results January 31, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. BellSouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

- (1) *Affected Measures:* O-7, O-8 & O-11

Description of Change: Currently, when there is a Partially Mechanized FOC or Clarification in LNP for the same CC/PON/VER that was previously used on an LSR that resulted in a Fatal Reject, BellSouth is incorrectly counting the Fatal Reject as a Fully Mechanized Reject. The subsequent LSR and Response are also correctly counted as a Partially Mechanized FOC or Reject. BellSouth proposes to update the PMAP code to capture only the Partially Mechanized FOC or Reject because Fatal Rejects should not be reflected in the data, per the SQM. This proposed change was Item (1) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5698)

Impact of Change: For June 2004, 6 Fully Mechanized LSRs that were fatally rejected in the region, were counted as Fully Mechanized Rejects for the Reject Interval Measure (O-8) and should not have been.

- (2) *Affected Measures:* O-8 & O-9

Description of Change: Effective August 2, 2004, per Carrier Notification Letter SN91084141, all remaining LSRs processed in the Atlanta LCSC were transitioned to the Birmingham LCSC. BellSouth proposes to make changes to the coding to reflect the hours of operation of the Birmingham LCSC. This proposed change was Item (2) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5779)

Impact of Change: No LSRs were impacted by this change in the June 2004, data month.

Provisioning Measurements

- (3) *Affected Measures:* P-7, P-7A & P-7B

Description of Change: Currently BellSouth uses Original Committed Due Date to determine the reporting period for these measures. BellSouth proposes to use the completion date to determine the reporting period consistent with the other Provisioning measures. This proposed change was Item (3) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5621)

Impact of Change: For May 2004, in Florida, one less record would have been reported. This record would have been reported in June data.

- (4) *Affected Measures:* P-11 Mechanized (Florida, Georgia, Kentucky, and Tennessee)

Description of Change: With the implementation of the ENCORE Release 16.0, BellSouth discovered that changes in the tables caused some xDSL, UDC, UCL, and EELs orders to be erroneously omitted from this measure. BellSouth proposes correcting the code to include these Partially Mechanized orders. This proposed change was Item (4) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5687)

Impact of Change: For June 2004, the result for the UNE disaggregation would have decreased by .016%.

- (5) *Affected Measures:* P-4A & P-4B (Georgia)

Description of Change: Currently, the SRS reports are displaying the incorrect retail analog for products of UNE 2W Loop Design, 2W Loop Design with INP and 2W Loop Design with LNP. The analog currently being displayed is Residence and Business Dispatch plus One Day. BellSouth proposes to display the correct analog of Residence and Business POTS plus One Day. This proposed change was Item (5) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5717)

Impact of Change: For July 2004, in Georgia, the retail analog that would be displayed would change from 6.64 days to 6.47 days.

Billing Measurements

- (6) *Affected Measures:* B-10

Description of Change: Currently, BellSouth reports data for this measure based on the month in which the dispute is resolved and divides this number into all responses sent in that month. This mismatch occasionally causes reported results to exceed 100%. BellSouth proposes to correct the code to use the month received as the month upon which the data is based. The received date will also be added to raw data. This proposed change was Item (6) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5757)

Impact of Change: For July 2004, in Florida, 3 of 3965 records (.0007%) were incorrectly marked causing a 100.88% reported result for Resale.

Special Access Measurements

- (7) *Affected Measures:* SA-3 (Tennessee)

Description of Change: Currently, on the Tennessee Aggregate Special Access Offered vs. Requested Due Date (Non-Distribution) Report, both the numerator and the denominator are being overstated by approximately equal amounts due to a programming error affecting this measurement. BellSouth proposes to implement changes in the coding to correct this problem. This proposed change was Item (7) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5398)

Impact of Change: For June 2004, the percentage of the time BellSouth met the Requested Due Date for DS1 would change from 98.49% to 96.97%.

Other Measurements

- (8) *Affected Measures:* TGP-1 & TGP-2

Description of Change: Currently, the Trunk Group Reports are produced manually. BellSouth proposes to mechanize the Trunk Group Reports in PMAP. This proposed change was Item (8) on the Preliminary December Data Notification filed on October 1, 2004. (RQ4857)

Impact of Change: No impact to data.

PRELIMINARY JANUARY 2005 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the January 2005 data month. Results for the January 2005 data month will be posted as follows:

Preliminary results February 21, 2005
Final results February 28, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Pre-Ordering Measurements

- (1) *Affected Measures:* OSS-2 & OSS-3

Description of Change: Currently, there is a problem with the way the raw data is displayed for these measures. The records in the raw data are listed by instances of unique availability results instead of unique server. As an example for OSS-2 for the July data month and the BOCRIS/CRIS application, the twelve servers that have this application loaded were included in the report. Eleven of these servers had 100% availability and one of them had 99.97% availability. The raw data showed two records, one with 100% and one with 99.97%. The reports were correct and complete. BellSouth proposes to correct this problem to display all the servers in the raw data. (RQ5804)

Impact of Change: None to reported results.

Provisioning Measurements

- (2) *Affected Measures:* P-9

Description of Change: Currently, the Access Carrier Name Abbreviation (ACNA) codes in the supporting data files are being directly populated from the Service Order Fact table. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to more accurately assign the Service Order ownership for Local Interoffice Trunks in the supporting data files. (RQ5545)

Impact of Change: None to reported results.

- (3) *Affected Measures:* P-4 & P-4A

Description of Change: Instead of using denial and restoral orders to manage customer non-payment situations, some CLECs issue an order for new service followed by a disconnect order for this purpose. Because service is already working at the location, the order for new service is a request for an additional line and is therefore identified as requiring dispatch of a technician to complete the order. BellSouth has been monitoring these orders, manually stopping the dispatch and assigning them an "L" appointment code because the now non-dispatch order has the longer dispatch installation interval due to the way the CLEC used this process. Bellsouth proposes to mechanize this "L" code assignment to avoid errors resulting from the manual process using the same criteria currently used to assign the code manually. (RQ5786)

Impact of Change: For May 2004, in Georgia, 328 orders would be excluded from the data. The interval for OCI would be reduced by 2.5 days.

- (4) *Affected Measures:* P-13D (Florida, Georgia, Kentucky, Louisiana, North Carolina, and Tennessee)

Description of Change: Currently, one of the Non-Wireless LNP filters is inappropriately applied causing some ELMS6 submitted records to be excluded from this measure. BellSouth proposes to update the code to appropriately apply this filter to these records. (RQ5918)

Impact of Change: BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

M&R Measurements

- (5) *Affected Measures:* MR-1, MR-2, MR-3 & MR-4

Description of Change: Currently, the Operating Company Name (OCN) codes in the supporting data files are being directly populated from the Trouble Ticket tables. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to assign the ticket ownership in the supporting data files, as in the case of line splitting/line sharing (dual ownership). (RQ5523)

Impact of Change: None to the reported data.

- (6) *Affected Measures:* MR-2

Description of Change: Currently, PMAP uses the RESH code to identify the CLEC to which a line is assigned. The RESH code format for resold services should be an "R" followed by the CLECs Operating Company Name (OCN). In some cases, the character is not present on ISDN lines and the record is assigned to an error file because PMAP cannot identify the CLEC. BellSouth proposes to change PMAP to accept either an "R" or a blank as the first character in these situations so that the record will be assigned to the proper CLEC. (RQ5743)

Impact of Change: For August 2004, in the BellSouth Region, approximately 200 lines would be added to the resale ISDN line count which would account for a decrease in CTRR of .07%.