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January 30, 2003

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 (OSS)

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth's Response to Action Items assigned to BellSouth at the conference call of January 22, 2003 between Staff and the Parties, which we ask that you file in the referenced 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 (JA)

Enclosures

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

DOCUMENT NUMBER-DATE
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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 30th day of January 2003 to the following:

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J. Phillip Carver
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**(+) Signed Protective
Agreement**

#237366

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the)	
establishment of operations)	
support systems permanent)	
performance measures for)	Docket No. 000121A-TP
incumbent local exchange)	
telecommunications companies)	
(BELLSOUTH TRACK))	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S ACTION ITEM RESPONSES
TO STAFF QUESTIONS FROM JANUARY 22, 2003 CONFERENCE CALL
REGARDING SERVICE QUALITY MEASUREMENT ISSUES**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Response to questions raised by the Florida Public Service Commission Staff ("Staff") during a conference call held on January 22, 2003, between the Staff, BellSouth and the ALECs:

ITEM 4 – ORIGINAL ISSUE 16

In its August 30, 2002 filing, BellSouth contended that aspects of the FOC Timeliness measurement (O-9) needed to be changed in order to account for the inclusion of an electronic facilities check requirement ordered by the Commission. Originally, BellSouth requested the opportunity to obtain additional data, and to propose modifications based upon an analysis of that data.

In its November 19, 2002 filing, BellSouth requested that it be allowed to conduct further analyses of the data over a longer period of time to determine if specific product groups or ordering types were consistently affected by the electronic facilities check requirement. The Staff agreed to allow BellSouth to file analysis of data related to this measure, especially with respect to the impact of the facility check requirement on the time required to return a FOC. During the January 22, 2003 conference call, BellSouth

indicated that based on the current data the benchmark for fully mechanized Firm Order Confirmations should be changed from 95% within 3 hours to 94% within 3 hours. Staff requested that BellSouth provide the rationale used to support changing this benchmark. As the table below indicates, for approximately 1% of the LSRs, the incremental time required to perform the electronic facility check consumes half (or more) of the allotted 3 hour interval to perform all of the functions required prior to the return of a Fully Mechanized FOC.

	Oct-02	Nov-02
Total fully mech LSRs requiring elec facility check	40140	56339
Of above total, number of LSRs where additional time required for elec facility check was more than 1 1/2 hours - which is half of the 3 hr FOC interval	385	513
% of total	1%	1%

Consequently, to account for the additional time required to perform the electronic facility check, BellSouth proposes to reduce the benchmark for Fully Mechanized FOC timeliness by 1%. BellSouth has attached, as Exhibit 1, a copy of the FOC Timeliness SQM (O-9) to reflect the proposed change to the benchmark for Fully Mechanized LSRs from 95% in 3 hours to 94% in 3 hours.

ITEM 18 – ORIGINAL ISSUE NO. 25

In its Comments filed on November 19, 2003, BellSouth proposed using Retail ISDN – BRI and ISDN-PRI as the analogue for UNE UDC/IDSL. During the January 22, 2003 conference call, the ALECs questioned whether ISDN – PRI should be included as part of the retail analogue for UNE UDC/IDSL based on BellSouth’s description of this service as a 2-wire interface application. BellSouth agreed to determine if the inclusion of ISDN-PRI in the retail analogue was an error. Consequently, BellSouth,

upon further investigation, has determined that the appropriate retail analogue for UNE UDC/IDSL is Retail ISDN – BRI, and will agree to this change in its original proposal. This change would apply to each provisioning or maintenance measure that lists UNE UDC/IDSL as a separate level of disaggregation in the SQM.

ITEM 81 – ORIGINAL ISSUE NO. 55

The Staff, in its January 10, 2003 proposal, disagreed with the ALECs' recommendation to delete "Listing Orders" from the list of exclusions for measure P-11, Service Order Accuracy. On the January 22, 2003 conference call, the ALECs stated that they needed clarification on how BellSouth interpreted the Georgia Public Service Commission's recent order with respect to the appropriate fields included for review under the Service Order Accuracy measure. The ALECs believed that the fields to be reviewed under this measure were agreed to by BellSouth and the ALECs, as listed in Birch Telecom's December 6, 2002 Petition For Reconsideration filed with the Georgia Public Service Commission (Docket No. 7892-U), and that Directory Listings were included as a field to be reviewed.¹

The ALECs believed that the appearance of Directory Listings in the agreed upon fields for review under this measure and the Listing Orders reflected as an exclusion in the SQM was ambiguous. Staff requested that BellSouth provide its understanding of the Georgia PSC order with respect to the treatment of Directory Listings.

¹ The Georgia Public Service Commission granted Birch Telecom's Petition For Reconsideration of it November 14, 2002 Order, with respect to the Service Order Accuracy measure. As part of its petition, Birch requested that the Commission amend its final order to include the agreed upon fields, which Birch attached to its petition as Exhibit B.

BellSouth has found no indication in the Georgia Order dated November 14, 2002 nor in the Commission's findings in its December 17, 2002 Agenda Session² that would eliminate the exclusion, as it currently exists, in the Georgia SQM for the Service Order Accuracy measure.

For clarification, BellSouth must emphasize, as it did during the January 22, 2003 conference call, that this exclusion is limited to those situations where BellSouth receives a Directory Listing only LSR. These are not a part of the Service Order Accuracy measurement as the exclusion states. However, an LSR for a UNE Loop or Resale service may include information in the directory fields. In this instance, the directory fields on the LSR and the associated service order are evaluated in the service order accuracy measurement.

Standalone Directory Listings orders are included in the measure D-2, Percent Database Update Accuracy, as discussed during the conference call.

Staff was also interested in knowing when BellSouth would implement the mechanized process for evaluating partially-mechanized LSRs and the associated service orders that are expected to be ordered by the Georgia PSC. BellSouth stated on the conference call that it is planning implementation of the mechanized process in March 2003. The details of implementation are still being addressed, but BellSouth has no indication at this time that this date is in jeopardy.

ITEMS 9 and 10 – ORIGINAL ISSUES NO. 23 and 24

Staff's Strawman advocated the elimination of measurement P-4A, replacing it with measurement P-4, modified to include the time from the receipt of a valid LSR. In

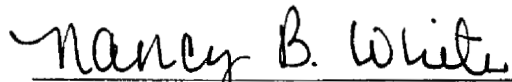
² The findings of the GPSC in its December 17, 2002 Agenda Session were included in its *Order On Reconsideration*, Docket No. 7892-U, dated January 24, 2003.

essence, the modification would result in combining the FOC time with the OCI interval. BellSouth noted that the combined measurement would require a modification in the SQM page for measurement P-4. BellSouth has attached, as Exhibit 2, a modified SQM page (measure P-4B) to reflect this change.

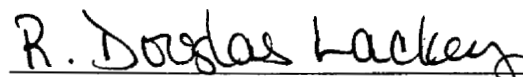
In addition, BellSouth pointed out on the January 22, 2003 conference call that as a result of changing to the P-4 measure (the modified version is labeled P-4B) to include the FOC interval, currently reflected in measure O-9, and the inclusion both the O-9 and the new P-4B measure in the penalty plan, BellSouth would be subject to dual penalties for the same failure. Therefore, Exhibit 1, the FOC Timeliness (O-9) SQM page has been modified to delete O-9 from the penalty plan. If the modified P-4B measurement is adopted in Florida, BellSouth would advocate this change to account for the revisions made to measure P-4 based on the Staff's proposal.

Respectfully submitted this 30th day of January 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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O-9: Firm Order Confirmation Timeliness

Definition

Interval for Return of a Firm Order Confirmation (FOC Interval) is the average response time from receipt of valid LSR or ASR to distribution of a Firm Order Confirmation. The interval will include an electronic facilities check.

Exclusions

- Service Requests canceled by CLEC prior to being confirmed.
- Designated Holidays are excluded from the interval calculation.
- LSRs which are identified and classified as "Projects"

Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website:
<http://www.interconnection.bellsouth.com/centers/html/lcsc.html>.

For ASRs processed in the Local Interconnection Service Center (LISC), all hours outside of Monday – Friday 8:00 – 4:30 CST, should be excluded.

The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

- LSRs which are identified and classified as "coin"

Business Rules

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI translator or TAG.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, or TAG) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via EDI translator, or TAG.
- **Non-Mechanized:** The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON.
- **Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Local Interconnection Service Center (LISC). The elapsed time is measured from receipt of a valid ASR (date and time stamp of a FAX or paper ASR received in the LISC) until the appropriate orders are issued by a BellSouth representative and a FOC issued in EXACT. Trunk data is reported as a separate category.

Note: When multiple FOCs occur on a single LSR, the first FOC is used to measure the interval.

Calculation

Firm Order Confirmation Interval = (a - b)

- a = Date and Time of Firm Order Confirmation
- b = Date and Time of Service Request Receipt

Average FOC Interval = (c / d)

- c = Sum of all Firm Order Confirmation Times
- d = Number of Service Requests Confirmed in Reporting Period

FOC Interval Distribution = (e / f) X 100

- e = Service Requests Confirmed in Designated Interval
- f = Total Service Requests Confirmed in the Reporting Period

Report Structure

- Fully Mechanized, Partially Mechanized, Non-Mechanized
 - CLEC Specific
 - CLEC Aggregate
- Geographic Scope
 - State
 - Region
- Fully Mechanized:
 - 0 - <=15 minutes
 - >15 - <=30 minutes
 - >30 - <=45 minutes
 - >45 - <=60 minutes
 - >60 - <=90 minutes
 - >90 - <=120 minutes
 - >120 - <=180 minutes
 - 0 - <=3 hours
 - >3 - <=6 hours
 - >6 - <=12 hours
 - >12 - <=24 hours
 - >24 - <=48 hours
 - >48 hours
- Partially Mechanized:
 - 0 - <=4 hours
 - >4 - <=8 hours
 - >8 - <=10 hours
 - 0 - <=10 hours
 - >10 - <=18 hours
 - 0 - <=18 hours
 - >18 - <=24 hours
 - >24 - <=48 hours
 - >48 hours
- Non-mechanized:
 - 0 - <=4 hours
 - >4 - <=8 hours
 - >8 - <=12 hours
 - >12 - <=16 hours
 - 0 - <=24 hours
 - >16 - <=20 hours
 - >20 - <=24 hours
 - >24 - <=36 hours
 - 0 - <=36 hours
 - >36 - <=48 hours
 - >48 hours
- Trunks:
 - 0 - <= 5 days
 - >5 - <= 10 days
 - 0 - <= 10 days
 - > 10 - <= 12 days
 - > 12 - <= 14 days
 - > 14 - <= 18 days
 - > 18 - <= 20 days

> 20 days

Data Retained

Relating to CLEC Experience

- Report month
- Interval for FOC
- Total number of LSRs
- State and Region
- Total Number of ASRs (Trunks)

Relating to BellSouth Performance

- Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation

SQM Analog/Benchmark (see below)

- Resale – Residence
- Resale – Business
- Resale – Design (Special)
- Resale PBX
- Resale Centrex
- Resale ISDN
- LNP Standalone
- INP Standalone
- 2W Analog Loop Design
- 2W Analog Loop Non-Design
- 2W Analog Loop with INP Design
- 2W Analog Loop with INP Non-Design
- 2W Analog Loop with LNP Design
- 2W Analog Loop with LNP Non-Design
- UNE Digital Loop < DS1
- UNE Digital Loop >= DS1
- UNE Loop + Port Combinations
- UNE Combination Other
- UNE ISDN Loop
- UNE Other Design
- UNE Other Non-Design
- UNE Line Splitting
- EELs
- Switch Ports
- UNE xDSL (ADSL, HDSL, UCL)
- Line Sharing
- Local Interoffice Transport
- Local Interconnection Trunks

SQM Analog/Benchmark

- Fully Mechanized: - 95 94% <=3 Hours
- Partially Mechanized:
 - 95% <=10 Hours
- Non-Mechanized: - 95% <=24 Hours
- Trunks: 95% <=48 Hours

SEEM Measure

SEEM	Tier I	Tier II
No Yes	X.....	X.....

SEEM Disaggregation

SEEM Analog/Benchmark

<input type="checkbox"/> Fully Mechanized	95% <= 3 Hours
<input type="checkbox"/> Partially Mechanized	95% <= 10 Hours
<input type="checkbox"/> Non-Mechanized	95% <= 24 Hours
• Local Interconnection Trunks	95% <= 48 Hours
• Not Applicable	Not Applicable

P-4B: FIRM ORDER Confirmation and Average Order Completion Interval (OCI) & Interval Distribution

Definition

The "Firm Order Average Completion Interval" measure monitors the interval of time it takes BellSouth to provide service for the CLEC or its own customers. The "Firm Order Completion Interval Distribution" provides the percentages of orders completed within certain time periods. This report measures how well BellSouth meets the interval offered to customers on service orders.

Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, Test Orders, etc., which may be N, C, R, or T Orders)
- Disconnect Orders
- "L" Appointment coded orders (where the customer has requested a later than offered interval)
- End user-caused missed appointments
- Rejected LSRs
- Sundays and Designated Holidays are excluded from the interval calculation
- LSRs which are identified and classified as "Projects"

Non-business hours for Partially Mechanized and Non-Mechanized LSRs are excluded from the interval calculation. The excluded time is the time outside of normal operations which can be found at the following website:
<http://www.interconnection.bellsouth.com/centers/html/lcsc.html>.

For ASRs processed in the Local Interconnection Service Center (LISC), all hours outside of Monday – Friday 8:00 – 4: 30 CST, should be excluded.

The hours excluded will be altered to reflect changes in the Center operating hours. The LCSC will accept faxed LSRs only during posted hours of operation.

The interval will be the amount of time accrued from receipt of the LSR until normal closing of the center if an LSR is worked using overtime hours.

In the case of a Partially Mechanized LSR received and worked after normal business hours, the interval will be set at one (1) minute.

Business Rules

For CLEC orders, the actual FOC and completion interval is determined for each order processed during the reporting period. For CLEC orders, the clock starts when BellSouth first receives a valid LSR or ASR and stops when the technician or system completes the order in SOCS. For BellSouth retail orders, an interval representing FOC time is added to the actual completion interval to determine a retail analog. Adding a representation of the FOC time is required since BellSouth retail orders do not have process analogous to the CLEC ordering process. The start time for the completion interval for BellSouth Retail Orders is the timestamp of the first entry into SOCS and the stop time is when the technician or system completes the order in SOCS. Elapsed time for each order is accumulated for each reporting dimension. The accumulated time for each reporting dimension is then divided by the associated total number of orders completed. Orders that are worked on zero due dates are calculated with a .33-day interval (8 hours) in order to report a portion of a day interval. These orders are issued and worked/completed on the same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).

Mechanized Rules:

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI translator, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI translator, LENS or TAG.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI translator, LENS, or TAG) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via EDI, LENS, or TAG.

- **Total Mechanized:** Combination of Fully Mechanized and Partially Mechanized LSRs which are electronically submitted by the CLEC.
- **Non-Mechanized:** The elapsed time from receipt of a valid paper LSR (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via LON.
- **Interconnection Trunks:** Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Local Interconnection Service Center (LISC). Trunk data is reported separately.

*Note: When multiple FOCs occur on a single LSR, the first FOC is used to measure the LSR interval

Calculation

Firm Order Completion Interval = (a - b)

- a = Completion Date
- b = Receipt of a valid LSR/ASR (CLEC orders); Earliest timestamp in SOCS + FOC (for BST orders)

Firm Average Completion Interval = (c ÷ d)

- c = Sum of all Completion Intervals
- d = Count of Orders Completed in Reporting Period

Firm Order Completion Interval Distribution (for each interval) = (e ÷ f) X 100

- e = Service Orders Completed in "X" days
- f = Total Service Orders Completed in Reporting Period

Report Structure

- CLEC Specific
- CLEC Aggregate
- BellSouth Aggregate
- Dispatch/Non-Dispatch categories applicable to all levels except trunks
- Fully Mechanized; Partially Mechanized; Non-Mechanized
- Residence, Business and UNE reported in day intervals = 0,1,2, 3,4,5, >5
- Design is 0-<=5, >5-<=10, >10-<=15, >15-<=20, >20-<=25, >25- 30, > 30
- All Levels are reported <10 line/circuits; >=10 line/circuits (except trunks)
- Geographic Scope
 - State, Region

Data Retained

Relating to CLEC Experience

- Report Month
- CLEC Company Name
- Order Number (PON)
- Interval for FOC
- Completion Date (CMPLTN_DT)
- Service Type (CLASS_SVC_DESC)
- Geographic Scope

Note: Code in parentheses is the corresponding header found in the Supporting Data File (SDF).

Relating to BellSouth Performance

- Report Month
- BellSouth Order Number
- Order Submission Date & Time
- Order Completion Date & Time
- Service Type
- Geographic Scope

SQM Disaggregation - Analog/Benchmark

Performance Standard (OCI + FOC)

Disaggregation	Analog/Benchmark (OCI)	Business Days (FOC) (Days Added to Interval)		
		FM	PM	NM
Resale Residence	Retail Residence	.5	1.0	2.5
Resale Business	Retail Business	.5	1.0	2.5
Resale Design	Retail Design	.5	1.0	2.5
Resale PBX	Retail PBX	.5	1.0	2.5
Resale Centrex	Retail Centrex	.5	1.0	2.5
Resale ISDN	Retail ISDN	.5	1.0	2.5
LNP (Standalone)	Retail Residence and Business (POTS)	.5	1.0	2.5
INP (Standalone)	Retail Residence and Business (POTS)	.5	1.0	2.5
2W Analog Loop Design	Retail Residence and Business Dispatch	.5	1.0	2.5
2W Analog Loop Non-Design	Retail Residence and Business - POTS Excluding Switch-Based Orders	.5	1.0	2.5
2W Analog Loop With LNP-Design	Retail Residence and Business Dispatch	.5	1.0	2.5
2W Analog Loop With LNP- Non-Design	Retail Residence and Business – POTS Excluding Switch-Based Orders	.5	1.0	2.5
2W Analog Loop With INP-Design	Retail Residence and Business Dispatch	.5	1.0	2.5
2W Analog Loop With INP-Non-Design	Retail Residence and Business – POTS Excluding Switch-Based Orders	.5	1.0	2.5
UNE Digital Loop <DS1	Retail Digital Loop <DS1	.5	1.0	2.5
UNE Digital Loop >=DS1	Retail Digital Loop >=DS1	.5	1.0	2.5
UNE Loop + Port Combinations	Retail Residence and Business			
- Dispatch	- Dispatch	.5	1.0	2.5
- Dispatch In	- Dispatch In	.5	1.0	2.5
- Switch Based	- Switch Based	.5	1.0	2.5
UNE Switch Ports	Retail Residence and Business (POTS)	.5	1.0	2.5
UNE Combo Other	Retail Residence, Business and Design Dispatch	.5	1.0	2.5
UNE xDSL (HDSL, ADSL and UCL)				
- Without Conditioning	<= 5 Days	.5	1.0	2.5
- With Conditioning	<=12 Days	.5	1.0	2.5
UNE ISDN	Retail ISDN – BRI	.5	1.0	2.5
UNE UDC/IDSL	Retail ISDN – BRI	.5	1.0	2.5
UNE Line Sharing Without Conditioning	ADSL Provided to Retail	.5	1.0	2.5
With Conditioning	<= 12 Days	.5	1.0	2.5
Local Transport (Unbundled Interoffice Transport)	Retail DS1/DS3 Interoffice	.5	1.0	2.5
UNE Line Splitting Without Conditioning	ADSL to Retail	.5	1.0	2.5
With Conditioning	<= 12 Days	.5	1.0	2.5
UNE Other Design	Retail Design	.5	1.0	2.5
UNE Other Non-Design	Retail Residence and Business	.5	1.0	2.5
EELs	Retail DS1/DS3	.5	1.0	2.5
Local Interconnection Trunks	Parity with Retail			5.5

SEEM Measure

SEEM Tier I Tier II

Yes..... X X

