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January 5, 2005

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:

Enclosed are BellSouth Telecommunications, Inc.'s Responses to Action Items raised during the SQM Workshop held on December 9, 2004, which we ask that you file in the captioned docket. A copy of the same is being provided to all parties as reflected in the attached certificate of service.

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 5th day of January, 2005 to the following:

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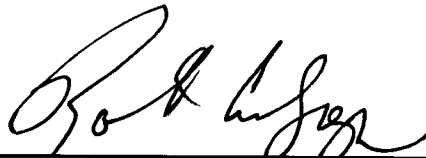
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**(+) Signed Protective
Agreement**

#502166

REQUEST: BellSouth is to provide the status of the Batch Scheduler application measured in the proposed UNE Bulk Migration Batch Scheduler Availability (Pre-Ordering) (BMIA) measure. Has the application been released?

RESPONSE: The UNE Bulk Migration Batch scheduler was tested and completed in October of 2004. Only one CLEC expressed an interest in testing the Bulk Migration Tool. That CLEC was given access to the tool and Test Scripts were suggested to assist them in testing various input scenarios. The CLEC tested the tool, provided feedback to BellSouth and BellSouth implemented some of the changes that were suggested and provided additional information in the Tutorial. The CLEC commented during the testing that the tool was very user friendly.

BellSouth is not able to measure response interval for this tool. This measure is not part of the OSS measures that are measured on response intervals because the UNE Bulk Migration Batch scheduler is not an OSS system; rather it is a web-based tool. Furthermore, the function does not require a query to a Legacy system, once the request is in PMAP so there is nothing to measure between PMAP and a subtending system.

Even if BellSouth were able to measure the response interval for this tool, there is no comparable retail function to compare against, which is the premise underlying the response time measure.

The UNE Bulk Migration Batch Scheduler replaced the manual process of a Project Manager manually responding to the request. This is important because BellSouth mechanized a manual process. The response time for bulk orders went from days to minutes/seconds with the implementation of the tool. BellSouth should not be required to measure a response interval that will be fractions of seconds when the process previously would have been measured in days.

REQUEST: BellSouth is to provide historical data for distribution intervals for the Local Interconnection Trunks (LIT) product disaggregation for O-8, Reject Interval, and O-9, Firm Order Confirmation Timeliness.

RESPONSE: Although these service requests are non-mechanized and continue to represent intensive, manual efforts to provide a response, the CLEC volumes of service requests rejected in each reporting period continues to decline, with the volume of service requests rejected for August, September, and October at 11, 8, and 8 respectively. The CLECs have improved their understanding of the ordering process for local interconnection trunks, and as a result, these low reject volumes do not allow BellSouth to miss a single service request.

Reject Interval Non-Mechanized	Month	Benchmark	Product	Result
	Nov - 03	95% <= 36 hours	LIT	63.16%
	Dec - 03	95% <= 36 hours	LIT	67.39%
	Jan - 04	95% <= 36 hours	LIT	70.83%
	Feb - 04	95% <= 36 hours	LIT	75.90%
	Mar - 04	95% <= 36 hours	LIT	89.09%
	Apr - 04	95% <= 36 hours	LIT	93.75%
	May - 04	95% <= 36 hours	LIT	89.09%
	Jun - 04	95% <= 36 hours	LIT	78.57%
	Jul - 04	95% <= 36 hours	LIT	40.63%
	Aug - 04	95% <= 36 hours	LIT	54.55%
	Sep - 04	95% <= 36 hours	LIT	37.50%
	Oct - 04	95% <= 36 hours	LIT	25.00%

Reject Interval Non-Mechanized	Month	Proposed Benchmark	Product	Result
	Nov - 03	85% <= 4 days	LIT	87.72%
	Dec - 03	85% <= 4 days	LIT	91.30%
	Jan - 04	85% <= 4 days	LIT	95.83%
	Feb - 04	85% <= 4 days	LIT	95.18%
	Mar - 04	85% <= 4 days	LIT	96.36%
	Apr - 04	85% <= 4 days	LIT	93.75%
	May - 04	85% <= 4 days	LIT	96.36%
	Jun - 04	85% <= 4 days	LIT	85.71%
	Jul - 04	85% <= 4 days	LIT	68.71%
	Aug - 04	85% <= 4 days	LIT	63.64%
	Sep - 04	85% <= 4 days	LIT	37.50%
	Oct - 04	85% <= 4 days	LIT	25.00%

RESPONSE:

FOC Non-Mechanized	Month	Benchmark	Product	Result *
	Nov - 03	95%<=48 hours	LIT	-
	Dec - 03	95%<=48 hours	LIT	-
	Jan - 04	95%<=48 hours	LIT	92.44%
	Feb - 04	95%<=48 hours	LIT	91.14%
	Mar - 04	95%<=48 hours	LIT	95.27%
	Apr - 04	95%<=48 hours	LIT	100.00%
	May - 04	95%<=48 hours	LIT	100.00%
	Jun - 04	95%<=48 hours	LIT	98.17%
	Jul - 04	95%<=48 hours	LIT	98.73%
	Aug - 04	95%<=48 hours	LIT	99.30%
	Sep - 04	95%<=48 hours	LIT	97.97%
	Oct - 04	95%<=48 hours	LIT	100.00%

FOC Non-Mechanized	Month	Proposed Benchmark	Product	Result
	Nov - 03	95%<=10 days	LIT	-
	Dec - 03	95%<=10 days	LIT	-
	Jan - 04	95%<=10 days	LIT	100.00%
	Feb - 04	95%<=10 days	LIT	100.00%
	Mar - 04	95%<=10 days	LIT	98.22%
	Apr - 04	95%<=10 days	LIT	100.00%
	May - 04	95%<=10 days	LIT	100.00%
	Jun - 04	95%<=10 days	LIT	100.00%
	Jul - 04	95%<=10 days	LIT	100.00%
	Aug - 04	95%<=10 days	LIT	100.00%
	Sep - 04	95%<=10 days	LIT	100.00%
	Oct - 04	95%<=10 days	LIT	100.00%

* This level of performance in Florida is indicative of the unusual lengths BellSouth must achieve in handling LSRs for local interconnection trunks. The proposed benchmark represents a realistic allotment of time for the amount of work involved for local interconnection trunks.

REQUEST: BellSouth is to provide a status update on the Combining of the Ordering and Repair Centers. Which organizations have combined their centers? What is the schedule for combining the centers?

RESPONSE: Based on recent decisions, the Ordering and Repair Center functions for BellSouth Business Systems (BBS) (Large Business customers) and Consumer Services (Residence) are not going to be combined. However, Small Business has combined their centers for ordering and maintenance.

REQUEST: Parties are to propose an alternative analog for UNE Analog Loop (Design) for measurements P-1, Held Order Interval, and P-4, Order Completion Interval (OCI).

RESPONSE: BellSouth believes that the proposed analog for UNE Analog Loop (Design), which is Retail Residence, Business, and Design (Dispatch), is correct. The high volumes of Residence and Business orders do not allow the addition of Design orders to have a significant impact when added to the analog. For example, in reviewing Florida data for November 2004 for Resale Residence and Business Dispatch, there were 35,006 orders, with an interval of 7.46. The addition of Design orders to the retail analog increases the total orders by only 260 orders to 35,266, and the interval to 7.55. This minor impact does not substantiate the CLEC's belief that that addition of the DS1 and DS3 Design orders would distort the comparison.

However, as an alternative, BellSouth would be willing to explore the option of a new analog for UNE Analog Loop (Design), which would be Retail Analog Design (Dispatch). The current analog, Residence and Business Dispatch, includes Residence, Business, PBX, Centrex, and ISDN but only the non-design orders. BellSouth proposes a new analog, Retail Analog Design Dispatch, which would include the designed orders for the above but omit Regular Design (which would include Foreign Central Office, Foreign Exchange) and Digital Loops \leq DS1.

REQUEST: BellSouth to provide the location of UCL (Non-Design) product in the product rollup.

RESPONSE: The Unbundled Copper Loops, UCL (Non-Design), products are reported in the UNE Other Non-Design product group.

REQUEST: BellSouth to provide 2 months of outages as reported in P-7B, Coordinated Customer Conversions – Average Recovery Time and information about the cause of these outages and what was required to restore service.

RESPONSE: For P-7B, Coordinated Customer Conversions – Average Recovery Time, the number of orders with any outage at all continues to be very low. For the period of November 2003 – October 2004, there were 5553 conversions and only 98 total troubles.

There were only 5 orders in Florida that took longer than 5 hours to resolve for the months of October 2004 and November 2004. A brief explanation has been provided of why the orders took longer than 5 hours to resolve the problem.

NY7WGG58 – This order was due on 9/30. The cut started at 13:47 and stopped at 13:53. BellSouth detected a hard/short in the field which required an outside dispatch. The outside technician was scheduled to be at the end user's premise at 15:45. The technician corrected the problem but the order was held open until 8:15 on 10/1 until the CLEC could test the circuit and accept the order. A late dispatch often allows the service problem to be corrected but the BellSouth and CLEC control offices (work centers) are not open to coordinate retesting and order acceptance. This miss was charged to BellSouth even though the end-user was back in service within several hours.

NRCXM0Y0 – This order was due on 11/1. The cut started at 15:48 and was completed at 15:53. The CLEC called in with a problem at 16:31 that required a BellSouth dispatch. A dispatch was scheduled for the next morning, 11/2; however the problem was determined to be at the CLEC's collocation. Because it was determined that the CLEC was at fault, this order should have been excluded and removed from the data.

CQFF4X29 – This order was due on 11/23. The cut Started at 11:37am 11-23-04, and the cut was stopped (completed) at 11:38am 11-23-04. The CLEC called the CWINS center to report a problem with the circuit and did not accept the order as completed. The call came in at 12:03pm 11-23-04. However, the end-user left the premise at 1:23pm 11-23-04. As a result, BellSouth had no chance to resolve the problem that day.

This time is not excluded in the calculation of the average recovery time for P-7B, Coordinated Customer Conversions. The problem was resolved on 11-24-04 and during that time the end-user could make calls but not receive them.

NYG7DTH2 – This order was due on 11-12. The cut was completed (stopped) at 3:00pm 11-12-04. CLEC reported a problem at 4:29pm 11-12-04 on a Friday evening. From the log notes for this order, it was not clear whether or not the CLECs center was available to continue working on the problem throughout the weekend. However, the problem was resolved the following Monday, 11-15-04 with no time excluded. The order was closed on Monday 11/15.

NY9FXD43- This order was due on 11-29. BellSouth completed all its work and the cut stopped at 12:51pm on 11-29-04. The CLEC reported a problem at 2:46pm 11-29-04. The BellSouth outside technician lost access at 5:52pm 11-29-04. Lost access means that either the technician arrived at the end-user's premise too late or had to leave the premises because the end-user was leaving for the day. This time is not excluded from the measurement calculation of the average recovery time for P-7B, Coordinated Customer Conversions. The problem was resolved the morning of the following day 11-30-04.