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March 23, 2005

Lisa Harvey Florida Public Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32302

RE: Docket No. 000121A - BellSouth Flow through Report

Dear Ms. Harvey,

Sincerely.

Attached is a copy of BellSouth's Flow-Through improvement plan progress report. As shown in the report, Flow Through is exceeding the benchmark in all areas. In fact, Residence Resale and UNE have exceeded the benchmark for two years now, with LNP not far behind. Additionally, Business Resale has exceeded the benchmark since September 2004. I would suggest that BellSouth be relieved from its Flow Through reporting requirement starting with the next quarter. Please do not hesitate to call me if you would like to discuss or if you have any further questions.

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#### BEFORE THE

#### FLORIDA PUBLIC SERVICE COMMISSION

Investigation into the establishment	)	Docket No. 000121A-TP
Of Operations Support Systems Permanent	)	
Performance Measures for Incumbent	)	
Local Exchange Telecommunications Companies	)	
		Filed: March 23, 2005

## BELLSOUTH'S FLOW-THROUGH IMPROVEMENT PLAN PROGRESS REPORT

### **OVERVIEW**

In its Performance Metrics Order, the Florida Public Service Commission ("Commission") ordered BellSouth to file a Flow-Through improvement plan by July 30, 2002 describing how it intends to achieve the Service Quality Measure Flow-Through benchmarks and show significant improvement in 2002. The Commission opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of Operations Support Systems ("OSS") provided for Competitive Local Exchange Carriers' ("CLECs") use by Incumbent Local Exchange Carriers ("ILECs"). Associated with the performance metrics is a monitoring and enforcement program to ensure that CLECs receive nondiscriminatory access to the ILEC's OSS.

BellSouth filed its first status update to the Commission on October 30, 2002. In response to the Commission's request dated August 18, 2003, BellSouth provided to the Commission, in a September 11, 2003 filing, performance updates in the categories outlined in its original plan report (actual and projected results), as well as the status of the implementation of flow-through improvement items.

At the time of that filing, BellSouth proposed – and the Commission agreed – that subsequent quarterly progress reports (beginning with the December 12, 2003 report) would focus solely upon segments that do not meet the benchmark for at least 2 out of 3 months within the subject quarter. The Commission further requested that the reports

include updates for segments that failed to meet the benchmark in any two consecutive months in order to capture segments that failed only the last month of the previous quarter and only the first month of the succeeding quarter.

No segments fell within this category for the November 2004 – January 2005 reporting timeframe. However, BellSouth provides an updated Flow-Through Improvement Projection chart for all categories for the next reporting period, and all projections exceed the benchmarks in all categories.

## FLOW-THROUGH IMPROVEMENT PROJECTION

(Past, Current and Projected Performance)

Category	Residence Resale		Business Resale		UNE		LNP	
Benchmark	95%		90%		85%		85%	
Actual/	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected
Projected		J						
Jul 02	87.70		73.23		89.13		88.50	
Aug 02	89.52		76.17		87.94		88.09	
Sep 02	90.20		77.80		89.81		88.81	
					92.71		86.53	
Nov 02	94.52		78.62		93.98		85.46	
Dec 02	93.55		81.40		92.21		82.81	
Jan 03	87.61		82.08		92.26		82.48	
Feb 03	86.95		82.34		95.57		76.45	
Mar 03	95.64		83.50		96.33		76.99	
Apr 03	97.95		87.11		96.11		79.82	
May 03	97.82		87.43		96.90		76.65	
Jun 03	97.43		86.15		95.88		83.05	
Jul 03	97.25		88.82		95.38		86.41	
Aug 03	97.31		88.67		96.13		84.64	
Sep 03	97.49		85.79		95.64		78.89	
Oct 03	97.38		86.33		96.63		74.00	
Nov 03	94.73		86.96	-	95.75		69.33	
Dec 03	97.82		88.48		96.69		93.40	
Jan 04	96.62		85.12		96.18		93.33	
Feb 04	97.88		89.75		95.99		93.95	
Mar 04	98.32		89.24		95.20		93.32	
Apr 04	98.62		90.64		95.80		96.58	
May 04	98.64		86.38		96.91		97.34	
June 04	98.50		85.04		96.89		97.62	
July 04	98.62		88.09		97.36		97.79	
Aug 04	98.57		88.95		97.55		97.77	
Sep 04	98.19		90.46		97.84		98.08	
Oct 04	98.57		90.07		97.96		96.82	
Nov 04	98.22		89.36		97.48		97.01	
Dec 04	98.70		91.09		98.03		94.33	
Jan 05	98.58		91.06		98.17		98.03	
Feb 05		98.58		91.06		98.17		98.03
Mar 05		98.58		91.06		98.25		98.03
Apr 05		98.58		91.06		98.28		98.03