

Robert A. Culpepper  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0841

May 2, 2006

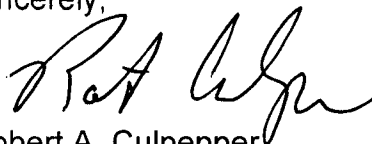
Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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

Dear Ms. Bayó:

Consistent with Appendix F of the Service Quality Measurements Plan adopted by this Commission, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Preliminary Notification Report for July 2006 data month. There are no changes to be placed on the Proposed June 2006 Data Notification List. The July 2006 changes will be discussed at the May 5, 2006 industry conference call.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record  
Jerry D. Hendrix  
James Meza, III

**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 2nd day of May, 2006 to the following:

Adam Teitzman  
Jerry Hallenstein  
Lisa Harvey  
David Rich  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6175  
Fax. No. (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[ihallens@psc.state.fl.us](mailto:ihallens@psc.state.fl.us)  
[lsharvey@psc.state.fl.us](mailto:lsharvey@psc.state.fl.us)  
[drich@psc.state.fl.us](mailto:drich@psc.state.fl.us)

Tracy W. Hatch  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
Fax. No. (850) 425-6361  
[thatch@att.com](mailto:thatch@att.com)

Sonia Daniels  
AT&T  
1230 Peachtree Street  
Suite 400  
Atlanta, GA 30309  
Tel. No. (404) 810-8488  
Fax. No. (281) 664-9791  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

Verizon, Inc.  
Kimberly Caswell  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Tel. No. (813) 483-2617  
Fax. No. (813) 223-4888  
[kimberly.caswell@verizon.com](mailto:kimberly.caswell@verizon.com)

Nanette Edwards (+)  
Regulatory Attorney  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Peter M. Dunbar, Esquire  
Karen M. Camechis, Esquire  
Pennington, Moore, Wilkinson,  
Bell & Dunbar, P.A.  
Post Office Box 10095 (32302)  
215 South Monroe Street, 2nd Floor  
Tallahassee, FL 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
[pete@penningtonlawfirm.com](mailto:pete@penningtonlawfirm.com)

Supra Telecommunications and  
Information Systems, Inc.  
Mr. Brian Chaiken  
2901 S.W. 149th Avenue, Suite 300  
Miramar, FL 33027-4153  
Phone: (786) 455-4248  
FAX: (786) 455-4600  
[bchaiken@stis.com](mailto:bchaiken@stis.com)

Michael A. Gross  
Vice President, Regulatory Affairs  
& Regulatory Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Susan Masterton  
Charles J. Rehwinkel  
Sprint  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, Florida 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Brian Sulmonetti  
MCI WorldCom, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5493  
Fax. No. (770) 284-5488  
[brian.sulmonetti@wcom.com](mailto:brian.sulmonetti@wcom.com)

William Weber, Senior Counsel  
Gene Watkins (+)  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor, Promenade II  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (508) 300-7749  
[wweber@covad.com](mailto:wweber@covad.com)  
[jbelle@covad.com](mailto:jbelle@covad.com)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

John Rubino  
George S. Ford  
Z-Tel Communications, Inc.  
601 South Harbour Island Blvd.  
Tampa, Florida 33602  
Tel. No. (813) 233-4630  
Fax. No. (813) 233-4620  
[gford@z-tel.com](mailto:gford@z-tel.com)

Vicki Gordon Kaufman  
Moyle Flanigan Katz Raymond  
& Sheehan, PA  
118 North Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
[vkaufman@moylelaw.com](mailto:vkaufman@moylelaw.com)  
Represents KMC Telecom  
Represents Covad  
Represents Mpower

Jonathan E. Canis  
Kelley Drye & Warren, LLP  
1200 19th Street, N.W., Fifth Floor  
Washington, DC 20036  
Tel. No. (202) 955-9600  
Fax. No. (202) 955-9792  
[jcanis@kelleydrye.com](mailto:jcanis@kelleydrye.com)

Tad J. (T.J.) Sauder  
Manager, ILEC Performance Data  
Birch Telecom of the South, Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108  
Tel. No. (816) 300-3202  
Fax. No. (816) 300-3350

John D. McLaughlin, Jr.  
KMC Telecom  
1755 North Brown Road  
Lawrence, Georgia 30043  
Tel. No. (678) 985-6262  
Fax. No. (678) 985-6213  
[jmclau@kmctelecom.com](mailto:jmclau@kmctelecom.com)

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335-8349  
Tel. No. (253) 851-6700  
Fax. No. (253) 851-6474  
[aisar@millerisar.com](mailto:aisar@millerisar.com)

Renee Terry, Esq.  
e.spire Communications, Inc.  
14405 Laurel Pl.  
Suite 200  
Laurel, MD 20707-6102  
Tel. No. (301) 361-4298  
Fax. No. (301) 361-4277

Mr. David Woodsmall  
Mpower Communications, Corp.  
175 Sully's Trail  
Suite 300  
Pittsford, NY 14534-4558  
Tel. No. (585) 218-8796  
Fax. No. (585) 218-0635  
[dwoodsmall@mpower.com](mailto:dwoodsmall@mpower.com)

Suzanne F. Summerlin, Esq.  
Attorney At Law  
2536 Capital Medical Blvd.  
Tallahassee, FL 32308-4424  
Tel. No. (850) 656-2288  
Fax. No. (850) 656-5589  
[summerlin@nettally.com](mailto:summerlin@nettally.com)  
[sbharvey@suzannesummerlinattorney.com](mailto:sbharvey@suzannesummerlinattorney.com)

Dulaney O'Roark III (+)  
WorldCom, Inc.  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Tel. No. (770) 284-5498  
[De.OROark@mci.com](mailto:De.OROark@mci.com)

Matthew Feil  
FDN Communications  
2301 Lucien Way, Suite 200  
Maitland, FL 32751  
Tel. No. (407) 835-0460  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)

Bill L. Bryant, Jr.  
Akerman Senterfitt  
106 East College Avenue  
Suite 1200  
Tallahassee, FL 32301  
Tel. No. (850) 224-9634  
[Bill.Bryant@akerman.com](mailto:Bill.Bryant@akerman.com)



---

Robert A. Culpepper

**(+) Signed Protective  
Agreement**

#502166

## **PRELIMINARY JULY DATA NOTIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth") is considering making the changes described in this document to generate results for the July 2006 data month. Results for the July 2006 data month will be posted as follows:

Preliminary results	August 21, 2006
Final results	August 31, 2006

BellSouth provides Data Notifications each month in compliance with the SQM Plan. 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.

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:* OSS-1

*Description of Change:* Currently, the 12-month Report for this measure displays the BellSouth and CLEC data for CRIS, DLETH, DLR, LMOS, LMOSUPD, LNP Gateway, MARCH, NIW, OSPCM, PREDICTOR, and SOCS as a two-place decimal form. BellSouth proposes to change the way the report is displayed to a percentage with two decimal places for planned standardization. (RQ8421)

*Impact of Change:* No impact to data.

### **Provisioning Measurements**

- (2) *Affected Measures:* P-7D

*Description of Change:* Currently, the Aggregate web reports reflect two decimal places for both the numerator and denominator. BellSouth proposes to remove the decimal places for all states. (RQ8339)

*Impact of Change:* No change to measurement results.

- (3) *Affected Measures:* P-11

*Description of Change:* Currently, BellSouth is identifying duplications of PONs when trying to match a service order to the LSR. To further refine this matching process, BellSouth proposes to test an additional field in order to associate the Service Order with the appropriate request. (RQ8352)

*Impact of Change:* In March 2006, 2 service orders were identified with a PON associated with 2 different LSRs. There would be no change to the reported results.

- (4) *Affected Measures:* P-13D

*Description of Change:* Currently BellSouth is including records where the CLECs have not met the 30 minute after Activate Message callback requirement. BellSouth proposes to exclude these records in accordance with the Regional SQM. (RQ8422)

*Impact of Change:* For January 2006, in the Region, 2 records were incorrectly included in the results. In Georgia, the results changed from 3 of 8 orders (37.50%) to 3 of 7 orders (42.50%). There was no change in Florida.

- (5) *Affected Measures:* P-13 (Alabama, Mississippi, North Carolina, and South Carolina)

*Description of Change:* BellSouth's regional SQM no longer requires LNP Average Disconnect Timeliness Interval. However, the report is still being produced and displayed on the PMAP website. BellSouth proposes to exclude this measure from PMAP for the above-listed states to comply with the regional SQM. (RQ8427)

*Impact of Change:* The measure will not be included on the PMAP website drop down menu.

- (6) *Affected Measures:* P-4

*Description of Change:* Currently, BellSouth is including ADSL orders requesting a "change of speed only" in the retail data. As required by the SQM, this retail product group is compared to UNE Line Splitting/Line Sharing with the intent to measure and report on the interval for installation of new service. The intent of this measure was never to compare minor software changes, which are administrative in nature and do not require technical work. BellSouth proposes to exclude these "change of speed" non-dispatched orders from the product group Retail ADSL in order to perform an analogous comparison to CLEC data. This is based on the fact that for customers who are served by a carrier other than BellSouth; these 'speed only changes' occur outside of BellSouth's purview

(network) and are invisible to BellSouth and therefore are not reflected in the CLEC data. (RQ8442)

*Impact of Change:* For February 2006, in Florida, Retail ADSL results would decrease the volume of completed orders in OCI from 54,956 to 28,298 and the OCI interval would change from 2.16 to 3.89 days. The Line Splitting/Line Sharing would not change with 124 completed orders and 1.98 Interval.

In Georgia, for the same period, the volume of completed orders for Retail ADSL in OCI would decrease from 28,934 to 12,411 and the interval would change from 1.27 to 2.12 days. The Line Sharing/Line Splitting interval would remain at 1.81 for 54 orders.

(7) *Affected Measures:* P-2B

*Description of Change:* Currently, the Numerator and Volume Totals for the retail product group "ADSL Provided to Retail" are doubled on this report. BellSouth proposes to correct the calculation to prevent this problem. (RQ8502)

*Impact of Change:* There is no change to the calculated results. For February 2006, in Georgia, the Numerator would decrease from 6,536 to 3,268 and the Volume would decrease from 107,196 to 53,598. In Florida, the Numerator would decrease from 10,052 to 5,026 and the Volume would decrease from 186,348 to 93,174.

#### **M&R Measurements**

(8) *Affected Measures:* MR-1, MR-2, MR-3, MR-4, and MR-5 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee)

*Description of Change:* BellSouth has identified a code problem where the numerator and denominator for ADSL Provided to Retail is being doubled and Residence Business and Design excluding Digital Loops is being tripled. This is due to the number of times each Product Group is reported as an analog. Additionally, Digital Loops are not being excluded from the Product Group. BellSouth proposes to correct both of these coding problems. (RQ8487)

*Impact of Change:* In February 2006, there were no calculated metric results changes to any M&R measure except CTRR (M&R 5). For CTRR, the Numerator only is incorrect resulting in improved performance for retail and results in four parity calculation changes.