Robert A. Culpepper **Senior Regulatory Counsel**

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

July 5, 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, BellSouth Telecommunications, Inc. ("BellSouth") is filing a Preliminary Notification Report for September 2006 data month. The September 2006 changes will be discussed at the July 10, 2006 industry conference call.

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 Jerry D. Hendrix 639564

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 July, 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 ihallens@psc.state.fl.us Isharvev@psc.state.fl.us 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

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 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

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

Supra Telecommunications and Information Systems, Inc. Marva Johnson 2901 S.W. 149th Avenue Suite 300 Miramar, FL 33027-4153 Phone: (786) 455-4248 FAX: (786) 455-4600 marva.johnson@supratelecom.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

Marsha E. Rule, Esq.
Rutledge, Ecenia, Purnell & Hoffman,
P.A.
215 South Monroe Street, Suite 420
Tallahassee, FL 32301
(850) 681-6788 (office)
(850) 681-6515 (fax)

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

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

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
jbell@covad.com
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

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
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

Tad J. (T.J.) Sauder
Manager, ILEC Performance Data
Birch Telecom of the South, Inc.
2300 Main Street FL
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

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

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

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
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

Matthew Feil FDN Communications 2301 Lucien Way, Suite 200 Mailtland, FL 32751 Tel. No. (407) 835-0460 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

(+) Signed Protective Agreement

Robert A. Culpepper

#502166

PRELIMINARY SEPTEMBER DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the September 2006 data month. Results for the September 2006 data month will be posted as follows:

Preliminary results October 20, 2006 Final results October 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: O-8 (RI), O-9 (FOCT), & O-11 (FOCC)

Description of Change: Currently, BellSouth does not have a specific disaggregation for Resale Coin and as a result, BellSouth is not capturing Resale Coin requests for these ordering measures in PMAP. BellSouth proposes to modify its code to include Resale Coin requests in the Resale Business disaggregation. (RQ7210)

Impact of Change: For May 2006 data, the FOCT results for Mechanized requests for Resale Business in GA would change from 98.01% to 98.02%, Partially Mechanized results for Resale Business did not change, and the Non-Mechanized results for Resale Business would change from 97.78% to 96.23%.

Mechanized requests for Resale Business in FL would change from 99.54% to 99.55%, Partially Mechanized results for Resale Business did not change, and the Non-Mechanized results for Resale Business would change from 96.00% to 95.37%.

(2) Affected Measures: PO-2 (LMT)

Description of Change: Currently, BellSouth is capturing multiple outbound timestamps for EDI Loop Makeup queries and is reporting those transactions

more than once. BellSouth proposes to modify its code to report each query only once. (RQ8578)

Impact of Change: In May 2006, had these queries been counted only once, the result would have changed from 73.06% to 97.12% in GA and from 96.56% to 99.64% in FL.

(3) Affected Measures: PO-2 (LMT)

Description of Change: BellSouth has not been including Web-based XML Loop Makeup queries in this measure. BellSouth proposes to change its code to begin including these transactions. (RQ8576)

Impact of Change: For May 2006 data, there were 4,388 Web-based XML records for the region. Of these, 1,822 had no state populated and the remaining 2,566 were in the state of FL. Had these queries been included the result in FL would have changed from 99.64% to 99.56%.

(4) Affected Measures: PO-2 (LMT)

Description of Change: BellSouth has not been including "Loop Reservation by Cable and Pair" or "Loop Reservation Cancel" requests in the Electronic Loop Makeup Response Time measure. BellSouth proposes to change its code to include these transactions. (RQ8157)

Impact of Change: For May 2006 data, BellSouth would report an additional 3,100 records for the region. The state results were not available for analysis, however with the inclusion of these records, the region results changed from 97.87% to 97.92%.

(5) Affected Measures: PO-2 (LMT)

Description of Change: Currently, BellSouth is displaying the numerator as both the numerator and denominator on CLEC specific reports for Electronic Loop Makeup Response Time. BellSouth proposes to change its code to report the correct denominator. (RQ8579)

Impact of Change: The CLEC SpecificWeb reports will be corrected. Aggregate reports and SEEMs calculations are not impacted.

Provisioning Measurements

(6) Affected Measures: P-11 (SOAC)

Description of Change: Currently in all states except Louisiana, BellSouth is using Service Order Listing data from a table, which includes only the main

listing, causing all additional listings to fallout for manual review. BellSouth proposes to update PMAP by using a comprehensive table that includes both the main Listing data as well additional Listing data. (RQ6373)

Impact of Change: For May 2006 data, 2 additional orders in Georgia and 1 additional order in Florida would have been identified. The addition of these orders would not have changed the reported results in either state.

(7) Affected Measures: P-13C

Description of Change: Currently BellSouth is including zero due dated orders that are expedited by a CLEC for this measure. BellSouth proposes to exclude these orders, which is consistent with the exclusion identified in the regional SQM. (RQ8365)

Impact of Change: For March 2006, there was only 1 record in the BellSouth region (Alabama) that should have been excluded.

(8) Affected Measures: P-7A (CCT) AL, MS, and SC Only

Description of Change: With the implementation of the Regional SQM plan in AL, MS, and SC, BellSouth is incorrectly excluding IDLC records from the Web reports in these states. BellSouth proposes to modify the code for this measure to include these records. (RQ8493)

Impact of Change: For May 2006 data, 9 IDLC records were excluded from the Hot Cut Timeliness web report for AL, MS and SC. By including these records, the IDLC results for these states would have changed from null to 100%.

(9) Affected Measures: P-1 (HOI), P-2B (PJ), P-3 (MIA), P-4 (OCI), P-5 (CNI), P-9 (PPT)

Description of Change: Currently, in all states except LA, BellSouth does not include Retail ISDN-BRI in the "Residence, Business and Design (Dispatch) (Excluding Digital Loops)" product group. BellSouth proposes to include the Retail ISDN-BRI products in the product group mentioned above. (RQ8512)

Impact of Change: For March 2006, Florida OCI results for "Residence, Business and Design (Dispatch) (Excluding Digital Loops)" product group would change from 3.49 to 3.50, and in Georgia the results would change from 3.76 to 3.78.

(10) Affected Measures: P-7D (NCDD)

Description of Change: Currently in all states except Louisiana, BellSouth is including orders for CLEC caused delays in the data. BellSouth proposes to exclude these records, which is consistent with the exclusions identified in the SOM. (RQ8549)

Impact of Change: For February, March and April 2006 data, no records were identified.

(11) Affected Measures: P-2A (PJ48), P-2B (PJ) KY Only

Description of Change: Currently, BellSouth is using an incorrect equity computation method to display results for the sub metric UNE XDSL Loop in these measures. BellSouth proposes to correct the methodology as outlined in the SOM. (RO8566)

Impact of Change: No impact to the reported results. The correct equity result would be displayed.

(12) Affected Measures: P-4 (OCI) TN Only

Description of Change: Currently, BellSouth is doubling the numerator and denominator on the Aggregate report for the products "UNE EELS" and the Analog "Retail DS1/DS3". BellSouth proposes to modify its code to eliminate this problem. (RQ8568)

Impact of Change: For April 2006 data, there was no change in reported results, the numerator and denominator will be displayed correctly.

(13) Affected Measures: P-1 (HOI), P-2A (PJ48), P-2B (PJ), P-3 (MIA), P-4 (OCI), P-5 (CNI), P-9 (PPT)

Description of Change: Currently, BellSouth is incorrectly identifying Coin Conversions orders as BellSouth orders during the conversion process to the CLECs. BellSouth proposes to correct its code to correctly identify these orders as CLEC orders. (RQ8597)

Impact of Change: For April 2006 data in Georgia and Florida, there was no change in the CLEC Aggregate results.

M&R Measurements

(14) Affected Measures: M&R-2 (CTRR)

Description of Change: BellSouth has determined that the WFA feed for lines in service contains records for lines in "Pending" status. As per the business rules in the SQM, CTRR contains all "Closed customer direct reports". Since orders in pending status are not "Closed customer direct reports", BellSouth proposes not to include lines in pending status. (RQ8519)

Impact of Change: For April 2006 data, there was no change in either the BellSouth or the CLEC metric.

Billing Measurements

(15) Affected Measures: B-2 (BIT)

Description of Change: BellSouth has identified a scenario in which a negative Billing Invoice Timeliness result could occur. BellSouth proposes to correct its code to properly identify the result. (RQ8530)

Impact of Change: For March and April 2006, there were no changes to the results at the aggregate level.

639792