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June 14, 2001

WRITTEN EX PARTE

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket No. 02-35

Dear Ms. Dortch:

With April performance data, BellSouth upgraded its Performance Measurement Reporting Platform ("PMAP") from PMAP Version 2.6 to PMAP Version 4.0. Version 4.0 is an enhanced platform that, among other things, will enable BellSouth to comply with multiple state-specific performance measures orders (e.g., NC, FL), provide improved ability to audit the code, and significantly reduce processing time for data production.

During the last five months, BellSouth has engaged in extensive testing of Version 4.0. With the April data, BellSouth validated finalized Georgia Version 4.0 code against April Version 2.6 code to ensure the validity of Version 4.0 data prior to posting. After the Commission issued its decision in Georgia and Louisiana, BellSouth discovered a few errors in the Version 2.6 code, three of which BellSouth is bringing the Commission's attention. These three errors, none of which represents a substantial change in BellSouth's performance, are briefly described below.

FOC & REJECT COMPLETENESS – XDSL

To accurately measure FOC & Reject completeness, PMAP needs to read the source data for a "Yes" or a "Null" to record whether or not the appropriate notice was returned to the CLEC. In Version 2.6, the code was written to look for a "No" rather than a "Null." Consequently, because a "No" never appeared, BellSouth consistently reported data for the xDSL sub-metrics as 100%. When BellSouth

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fixed this error in Version 4.0 code, BellSouth's performance apparently declined in April for the mechanized and partially mechanized sub-metrics from previous months as reflected below:

#### April Mechanized

xDSL/EDI	98.48%
xDSL/TAG	89.88%

#### April Partially-Mechanized

xDSL/EDI	67.39%
xDSL/TAG	70.00%

As the data demonstrate, this error caused no substantial change in BellSouth's reported mechanized performance, as BellSouth's performance on the mechanized measures remained approximately 90%. Moreover, BellSouth's combined electronically-submitted performance was 90.71% for January, 94.80% for February, 85.17% for March, and 93.24% for April. Finally, BellSouth's performance on the provisioning and maintenance and repair measures for xDSL remains unaffected by this error.

Despite the relatively high April performance, BellSouth performed a root cause analysis of the process to investigate the performance, particularly for partially mechanized orders. During this analysis, BellSouth discovered an operational issue in which supplemented xDSL LSRs submitted electronically by the CLECs were being dropped to the LCSC by the Corporate Gateway/Delivery Order Manager ("COG/DOM") (the interface through which electronically-submitted xDSL orders flow). In that scenario, the LCSC had a process in place to send manual FOCs back to the CLECs rather than the notice being sent electronically. The result of this error in COG/DOM is that while the CLEC was to receive a manual FOC (or reject), PMAP would not capture a manual FOC or reject as a mechanized or partially-mechanized response. This operational issue is causing BellSouth's performance to appear worse than it is. When the manually-returned FOCs and rejects are included in the data, BellSouth's combined performance for electronically-submitted orders improves to 94.53% for January, 95.87% for February, 88.80% for March, and 95.32% for April.

#### LINE SHARING PROVISIONING MEASURES

The UNN1 field identifier ("FID") is used to identify certain line sharing orders as line sharing circuits. In order to use the UNN1 FID to identify an order as a line sharing order for the provisioning measures, PMAP needs to extract from the Service Order Control System ("SOCS") certain CLEC-identifying information

specific to line sharing orders. PMAP Version 2.6 failed to extract the CLEC information from SOCS and, consequently, did not identify orders using the UNN1 FID as line sharing orders. BellSouth corrected this coding error in April Version 4.0 data. A comparison of April Version 2.6 data and April Version 4.0 data is attached as Exhibit A.

As Exhibit A demonstrates, this error caused no substantial change in BellSouth's reported performance. For instance, on the Order Completion Interval ("OCI") for <6 circuits/Dispatch, the CLEC data only changed .36 days and actually improved even though the parity evaluation changed from a "yes" to a "no." Likewise, while the <6 circuits/Non-Dispatch parity evaluation changed from a "yes" to a "no," the CLEC performance only changed by .45 of a day. Moreover, while the parity evaluation for this sub-metric became a "no," the difference between BellSouth's performance for itself and BellSouth's performance for the CLECs was only .37 of a day – hardly a competitively significant difference.

On Provisioning Troubles Within 30 Days, the parity assessment for <10 circuits/Dispatch remained a "no" from PMAP Version 2.6 to PMAP Version 4.0, and while the parity evaluation for <10 circuits/Non-dispatch changed from "yes" to "no," BellSouth's performance for the CLECs actually improved from 21.43% to 11.30%.

On Held Orders, % Jeopardies, Missed Installation Appointments and Average Completion Notice Interval, BellSouth's performance for CLECs changed minimally, if at all, and the parity evaluations remained the same. Thus, the April data demonstrate that the Version 2.6 error caused no substantial change in BellSouth's reported performance. Finally, the line sharing ordering and maintenance and repair measurements (which were not affected by this error) continue to reflect BellSouth's compliant performance for this product. In sum, all of the evidence supports the conclusion that this error did not cause a substantial change.

#### PROVISIONING MEASURES FOR LOCAL INTERCONNECTION TRUNKS

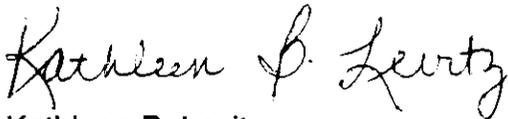
To identify a local interconnection trunk as such for purposes of the provisioning metrics, PMAP matches the Service Order Number from the Workforce Administration System (WFA) and from SOCS. On service orders with more than 25 circuits, WFA splits the service order and adds a suffix (such as an "A" or a "B") to the end of the service order numbers (so service order number xxxxxxxx becomes xxxxxxxxA). The corresponding service order number in SOCs, however, does not receive the suffix. Thus, when PMAP Version 2.6 attempted to match the two service orders, they wouldn't match and PMAP would identify the circuit as a digital loop in the <DS1 product disaggregation as opposed to

identifying it as a local interconnection trunk. BellSouth addressed this operational issue in the PMAP Version 4.0 code. A comparison of April Version 2.6 data with April Version 4.0 data is attached as Exhibit A.

As Exhibit A demonstrates, this error caused no substantial change in BellSouth's reported performance. OCI was the only measure that had a parity change - % Jeopardies, Missed Installation Appointments, Provisioning Troubles Within 30 Days and Average Completion Notice Interval all remained the same. Moreover, BellSouth's overall performance for January-March on ordering and maintenance and repair measures for trunks (which this error did not impact) remains approximately 90%.

BellSouth appreciates the opportunity to bring these issues, none of which represents a substantial change in BellSouth's performance, to the Commission's attention. If you have any questions or need any additional information, please call me at 202.463.4113. I am filing two copies of this *ex parte* and attachment and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Michelle Carey  
Renee Crittenden  
Aaron Goldberger  
Daniel Shiman  
John Rogovin  
James Davis-Smith



Exhibit A

B.2.8.7	P-2	Line Sharing/GA(hours)	>= 48 hrs									4.0 Apr-02 MSS
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**% Jeopardy Notice >= 48 hours - Mechanized**

B.2.10.7	P-2	Line Sharing/GA(%)	95% >= 48 hrs									2.6 Apr-02 MSS
B.2.10.7	P-2	Line Sharing/GA(%)	95% >= 48 hrs									4.0 Apr-02 MSS

**% Missed Installation Appointments**

B.2.18.7.1.1	P-3	Line Sharing/<10 circuits/Dispatch/GA(%)	ADSL to Retail	3.53%	9,711	0.00%	9		0.06156	0.5738	YES	2.6 Apr-02 MSS
B.2.18.7.1.1	P-3	Line Sharing/<10 circuits/Dispatch/GA(%)	ADSL to Retail	3.51%	9,700	5.49%	91		0.01937	-1.0271	YES	4.0 Apr-02 MSS
B.2.18.7.1.2	P-3	Line Sharing/<10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	0.04%	4,778	0.00%	19		0.00470	0.0890	YES	2.6 Apr-02 MSS
B.2.18.7.1.2	P-3	Line Sharing/<10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	0.06%	3,308	0.00%	328		0.00142	0.4249	YES	4.0 Apr-02 MSS
B.2.18.7.2.1	P-3	Line Sharing/>=10 circuits/Dispatch/GA(%)	ADSL to Retail	4.00%	25							2.6 Apr-02 MSS
B.2.18.7.2.1	P-3	Line Sharing/>=10 circuits/Dispatch/GA(%)	ADSL to Retail	4.17%	24							4.0 Apr-02 MSS
B.2.18.7.2.2	P-3	Line Sharing/>=10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	6.25%	16							2.6 Apr-02 MSS
B.2.18.7.2.2	P-3	Line Sharing/>=10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	5.88%	17							4.0 Apr-02 MSS

**% Provisioning Troubles within 30 Days**

B.2.19.7.1.1	P-9	Line Sharing/<10 circuits/Dispatch/GA(%)	ADSL to Retail	14.91%	9,582	37.50%	8		0.12600	-1.7927	NO	2.6 Apr-02 MSS
B.2.19.7.1.1	P-9	Line Sharing/<10 circuits/Dispatch/GA(%)	ADSL to Retail	3.97%	9,460	39.42%	104		0.01926	-18.4034	NO	4.0 Apr-02 MSS
B.2.19.7.1.2	P-9	Line Sharing/<10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	12.67%	3,716	21.43%	14		0.08908	-0.9826	YES	2.6 Apr-02 MSS
B.2.19.7.1.2	P-9	Line Sharing/<10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	2.06%	3,406	11.30%	345		0.00802	-11.5383	NO	4.0 Apr-02 MSS
B.2.19.7.2.1	P-9	Line Sharing/>=10 circuits/Dispatch/GA(%)	ADSL to Retail	6.67%	30							2.6 Apr-02 MSS
B.2.19.7.2.1	P-9	Line Sharing/>=10 circuits/Dispatch/GA(%)	ADSL to Retail	10.34%	29							4.0 Apr-02 MSS
B.2.19.7.2.2	P-9	Line Sharing/>=10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	0.00%	6							2.6 Apr-02 MSS
B.2.19.7.2.2	P-9	Line Sharing/>=10 circuits/Non-Dispatch/GA(%)	ADSL to Retail	0.00%	6							4.0 Apr-02 MSS

**Average Completion Notice Interval - Mechanized**

B.2.21.7.1.1	P-5	Line Sharing/<10 circuits/Dispatch/GA(hours)	ADSL to Retail	10.40	9,434	0.02	3	29,884	17,25628	0.6016	YES	2.6 Apr-02 MSS
B.2.21.7.1.1	P-5	Line Sharing/<10 circuits/Dispatch/GA(hours)	ADSL to Retail	10.14	9,643	0.05	2	29,299	20,71940	0.4871	YES	4.0 Apr-02 MSS
B.2.21.7.1.2	P-5	Line Sharing/<10 circuits/Non-Dispatch/GA(hours)	ADSL to Retail	0.85	4,764	0.60	10	5,804	1,83731	0.1334	YES	2.6 Apr-02 MSS
B.2.21.7.1.2	P-5	Line Sharing/<10 circuits/Non-Dispatch/GA(hours)	ADSL to Retail	0.86	3,302	0.34	3	6,814	3,93610	0.1318	YES	4.0 Apr-02 MSS
B.2.21.7.2.1	P-5	Line Sharing/>=10 circuits/Dispatch/GA(hours)	ADSL to Retail	6.67	20			26.180				2.6 Apr-02 MSS
B.2.21.7.2.1	P-5	Line Sharing/>=10 circuits/Dispatch/GA(hours)	ADSL to Retail	24.33	24			93.857				4.0 Apr-02 MSS
B.2.21.7.2.2	P-5	Line Sharing/>=10 circuits/Non-Dispatch/GA(hours)	ADSL to Retail	2.26	12			4.406				2.6 Apr-02 MSS
B.2.21.7.2.2	P-5	Line Sharing/>=10 circuits/Non-Dispatch/GA(hours)	ADSL to Retail	1.92	17			3.694				4.0 Apr-02 MSS

**Local Interconnection Trunks - Provisioning**

C.2.1	P-4	Local Interconnection Trunks/GA(days)	Parity w Retail	21.53	34	24.44	41	12,006	2,78473	-1.0448	YES	2.6 Apr-02 MSS
C.2.1	P-4	Local Interconnection Trunks/GA(days)	Parity w Retail	21.79	52	28.01	78	12,407	2,22116	-2.7994	NO	4.0 Apr-02 MSS

Exhibit A

**Held Orders**

C.2.2	P-1	Local Interconnection Trunks/GA(days)	Parity w Retail	0.00	0	0.00	0				YES	2.6 Apr-02 MSS
C.2.2	P-1	Local Interconnection Trunks/GA(days)	Parity w Retail	0.00	0	0.00	0				YES	4.0 Apr-02 MSS

**% Jeopardies**

C.2.3	P-2	Local Interconnection Trunks/GA(%)	Parity w Retail	0.00%	37	0.00%	48		0.00000		YES	2.6 Apr-02 MSS
C.2.3	P-2	Local Interconnection Trunks/GA(%)	Parity w Retail	0.00%	49	0.00%	95		0.00000		YES	4.0 Apr-02 MSS

**Average Jeopardy Notice Interval**

C.2.4	P-2	Local Interconnection Trunks/GA(hours)	95% >= 48 hrs									2.6 Apr-02 MSS
C.2.4	P-2	Local Interconnection Trunks/GA(hours)	95% >= 48 hrs									4.0 Apr-02 MSS

**% Missed Installation Appointments**

C.2.5	P-3	Local Interconnection Trunks/GA(%)	Parity w Retail	14.71%	34	0.00%	42		0.08170	1.7999	YES	2.6 Apr-02 MSS
C.2.5	P-3	Local Interconnection Trunks/GA(%)	Parity w Retail	9.62%	52	2.65%	113		0.04940	1.4090	YES	4.0 Apr-02 MSS

**% Provisioning Troubles within 30 Days**

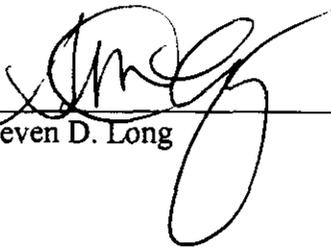
C.2.6	P-9	Local Interconnection Trunks/GA(%)	Parity w Retail	0.46%	3,928	0.00%	2,484		0.00173	2.6467	YES	2.6 Apr-02 MSS
C.2.6	P-9	Local Interconnection Trunks/GA(%)	Parity w Retail	1.65%	7,263	0.00%	5,152		0.00232	7.1158	YES	4.0 Apr-02 MSS

**Average Completion Notice Interval**

C.2.7	P-5	Local Interconnection Trunks/GA(hours)	Parity w Retail	94.36	33	20.24	42	147.648	34.34603	2.1580	YES	2.6 Apr-02 MSS
C.2.7	P-5	Local Interconnection Trunks/GA(hours)	Parity w Retail	234.39	46	30.43	110	359.260	63.08063	3.2333	YES	4.0 Apr-02 MSS

**CERTIFICATE OF SERVICE**

I do hereby certify that I have this 14<sup>th</sup> day of June, 2002, served the following parties to this action with a copy of the foregoing, by hand delivery, and/or by placing a copy of the same in the United States Mail, postage prepaid, and/or by e-mail, addressed to the parties on the attached service list.

  
\_\_\_\_\_  
Steven D. Long

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