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Guy M. Hicks
General Counsel

February 8, 2000

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37245

Re: *Third Party Testing of BellSouth OSS*
Docket No. 99-00347

Dear Mr. Waddell:

Enclosed are fourteen copies of comments regarding KPMG's Supplemental OSS Test Plan filed with the Georgia Public Service Commission on January 31, 2000 on behalf of the following parties:

Covad Communications
Sprint Communications Company
Rhythms Links, Inc.
AT&T Communications

Copies of the enclosed are being provided to counsel of record in this proceeding.

Very truly yours,

Guy M. Hicks

GMH:ch

Enclosure

196370

POSTED

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January 31, 2000

Via Hand Delivery

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue
Room 520
Atlanta, GA 30334

Re: **Docket No. 8354-U: Investigation Into Development of Electronic Interfaces for BellSouth Telecommunications, Inc.'s Operational Support Systems**

Dear Ms. O'Leary:

Enclosed for filing are an original and fifteen (15) copies, along with a diskette containing an electronic version in Microsoft Word, of the Comments of Covad Communications Regarding KPMG's Supplemental OSS TestPlan on behalf of Covad Communications.

Please acknowledge your receipt of the enclosed by date-stamping the three (3) extra copies and returning them to the undersigned VIA the self-addressed stamped envelope provided for your convenience.

Thank you for your assistance with this matter.

Very truly yours,

Charles V. Gerkin, Jr.

CVG/sat
Enclosures
cc: All Parties of Record (via regular mail w/encls.)

Before the
GEORGIA PUBLIC SERVICE COMMISSION
Atlanta, Georgia

In re: INVESTIGATION INTO DEVELOPMENT OF ELECTRONIC INTERFACES FOR BELLSOUTH TELECOMMUNICATIONS, INC.'S OPERATIONAL SUPPORT SYSTEMS	Docket No. 8354–U

COMMENTS OF COVAD COMMUNICATIONS REGARDING KPMG'S SUPPLEMENTAL OSS TEST PLAN

Comes Now, DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") and files the following comments regarding the BellSouth Telecommunications, Inc. OSS -Evaluation -Georgia Supplemental Test Plan ("STP") filed with this commission on January 24, 2000.

INTRODUCTION

Covad is a competitive local exchange carrier that provides high-speed Internet and network access utilizing DSL ("Digital Subscriber Line") technology. Covad offers DSL services through Internet Service Providers to small and medium-sized businesses and home users and directly to companies who use DSL to enable their employees to connect with the businesses' internal computer networks (or "local area networks") from their homes. Covad provides its services across the United States in 51 of the top Metropolitan Statistical Areas (MSAs), including Atlanta, and will offer its services to customers in 100 MSAs by the end of 2000.

On December 21, 1999, the Georgia Public Service Commission ordered BellSouth to submit a supplemental test plan that, among other things, evaluated the current pre-ordering, ordering and provisioning of xDSL capable loops. (See, Order, dated December 21, 1999). To provide its service, Covad must order xDSL capable loops from BellSouth. Presently, BellSouth has no electronic pre-ordering and ordering interface for competitive local exchange carriers ("CLECs") that order, among other UNEs, ADSL, HDSL, ISDN, or UCL loops. These are the loops Covad needs to provide its service. Without access to electronic ordering, Covad and other CLECs must submit orders manually, which severely limits their ability to scale their business to commercial levels. Additionally, Covad has experienced serious problems with BellSouth's provisioning of xDSL loops. The following comments are intended to insure that the supplemental test provides this Commission with accurate and complete information for its understanding of the enormous challenges CLECs face in pre-ordering, ordering and provisioning of loops for their competitive advanced services. Significantly, BellSouth's retail division faces no similar challenges to provisioning its own ADSL service.

COMMENTS

I. Covad's Experience with KPMG Tests

KPMG has performed OSS compliance tests in other states such as New York and Pennsylvania and Covad has been actively involved in those tests. From those tests, Covad has learned that the following guiding principles must be considered to achieve an effective test: (1) The purpose of the test should be to achieve independent results that mirror the experiences of actual CLECs, and KPMG must not be given any preferential treatment during

testing; (2) KMPG should present data to this Commission and leave the ultimate determination of compliance or non-compliance with the Telecommunications Act to this Commission; (3) The test should evaluate the completeness of performance measurements; (4) The test should test the achievement of true integration in pre-ordering and ordering systems, rather than constituting KPMG's description of how integration could be achieved; and (5) The test must measure a wide variety of volumes, including normal, high and stress situations.

II. The Purpose of the Supplemental Test Plan

To obtain loops from BellSouth, Covad needs to be able to qualify the xDSL capabilities of loops and then to be able to submit orders to provision the loops. Covad's business plan requires that these functions of loop qualification and loop ordering be performed via electronic interfaces, preferably using EDI. Covad needs electronic interfaces because Covad recognizes that it will not be able to compete in the market if it is forced to qualify and order loops manually. BellSouth admits that its electronic interfaces do not support this pre-ordering and ordering functionality. Thus, the STP must conclude that BellSouth's OSS fails to accommodate pre-ordering and ordering of the xDSL UNEs. Any other conclusion belies the purposes of the test. Furthermore, KPMG's testing and evaluation should provide specific information from BellSouth for when and how it will provide these functionalities. The information previously provided by BellSouth lacks both specificity and scheduling.

III. KPMG Must Act as Independent Tester

KPMG must follow its own assertion made in the STP introduction section where KPMG states that its purpose is to **assist** the Georgia Public Service Commission in assessing whether BellSouth meets the requirements of the Telecommunications Act. The Georgia Commission, and not KPMG, should make the determination about whether BellSouth's OSS interfaces provide access to OSS systems that are at parity with what BellSouth provides to its retail division. In providing information to this Commission, KPMG must act as a truly independent party, hired to perform independent testing. The STP must measure the level of OSS interface compliance with the requirements of the Telecommunications Act. It should not be crafted by KPMG to measure BellSouth's interpretation of the requirements of the Telecommunications Act. It appears that the STP, as presently drafted, will measure only the aspects of OSS that BellSouth considers ready to be tested.

IV. BellSouth's Interfaces Lag Behind the Industry Standard

Covad provides service in every region of this country by acquiring UNEs from all the regional Bell operating companies as well as other ILECs such as Sprint and GTE. BellSouth's OSS interfaces lag significantly behind the rest of the industry. The lag exists in BellSouth's support for industry standards in EDI, CORBA, and data transport mechanisms such as ECIC's Interactive Agent. Also, BellSouth is the only ILEC that does not provide the CLECs with any electronic interface for xDSL capable loop ordering. A truly independent test would compare BellSouth's OSS to the standards in the industry. By including an industry testing component, this Commission will insure that Georgia consumers are not left behind, as

advanced services are rapidly deployed in every other region in the country through the use of electronic interfaces.

V. KPMG Must Be Treated like Actual CLECs Are Treated

Critical to any testing scenario is that the tester be treated as any other CLEC would be treated by BellSouth. Covad, for example, has made repeated requests for a meeting with BellSouth to discuss how best to bring BellSouth up to par with the rest of the industry with respect to electronic interfaces. BellSouth has largely ignored those requests and, at any rate, BellSouth has failed to make any meaningful progress. Additionally, BellSouth has failed to provide Covad or other CLECs with definite information about when electronic interfaces for pre-ordering and ordering will be available. These interfaces were once promised for August 1999, then June 2000, and now the latest promise is that they may be available in August 2000.

For a third party test to be accurate, the third party tester must likewise face the same communication difficulties that CLECs face. KPMG's plan reveals no information about how or if it will mask its attempts to test BellSouth's systems. Without such masking, KPMG's tests will fail to reveal the true deficiencies in BellSouth's OSS interfaces. BellSouth is clearly cooperating with its third party tester. That cooperation enables KPMG to gain access to information and personnel needed to successfully complete its testing. In sharp contrast, CLECs do not experience that same level of cooperation and commitment. Therefore, KPMG's efforts are leveraged off its special and unique relationship with BellSouth. KPMG's

test should be designed to achieve the same result actual CLECs achieve in their interactions with BellSouth.

VI. Actual Integration

In its New York tests, KPMG did not perform the actual integration of pre-ordering and ordering, yet KPMG concluded that the interfaces were readily integratable. Similarly, KPMG has no intention of conducting the pre-ordering and ordering integration tests in Georgia. The Pre-Ordering, Ordering, and Provisioning Test Section indicates that KPMG will perform an activity to simulate the system-related activities of a CLEC integrating the pre-order and order functions. Why is KPMG simulating this activity? If ILEC pre-ordering and ordering interfaces have been proven in the past to be so readily integratable why not perform the actual task of integration? How will this activity be simulated? Does the transfer of data from pre-ordering to ordering by a human tester represent a test of integration to KPMG? If so, KPMG is seriously underestimating the difficulties experienced by many CLECs that have tried to develop this important integration functionality. KPMG's test should actually perform the task of integration before it concludes that the interfaces are integratable. Covad's experience has shown that actual integration is much more difficult that conceptual integration.

VII. Manual Ordering Can Never Achieve Parity

In the STP, KPMG will apparently be performing manual ordering tests of BellSouth's xDSL capable loops. A manual ordering test, by its very nature, will provide information that this Commission already knows: Manual orders can never be at parity with the electronic

ordering available to BellSouth's retail operations. Thus, a manual ordering test has little meaning to Covad and other CLECs. Covad cannot grow its business and greatly expand the number of Georgia residents it serves by faxing loop orders to BellSouth. Manual orders introduce many additional steps that must be performed by Covad's order administrators. With each step, an additional opportunity for error occurs. Additionally, each manual step in the process delays the process.

Covad intends to deliver competitive high speed internet access to as many Georgia residents as it can. Covad's business plan is driven by the need to scale the business to meet the overwhelming demand for these services. Covad can never meet that demand with a system dependant upon faxing or emailing orders to BellSouth. Most significantly, additional steps are required for Covad because BellSouth has chosen not to implement electronic ordering. These additional steps are not required for BellSouth's retail operations. BellSouth's retail services have access to electronic, instantaneous pre-ordering, ordering and provisioning databases that are denied all BellSouth competitors. There is no parity in this area.

VIII. Volume Testing

In New York, KPMG concluded that the interfaces were ready to handle large volumes of orders. The tests to reach that conclusion were later proven to be inadequate. In its Georgia STP, KPMG must revise and disclose its exact approach to volume testing to ensure that the conclusions are not reached based on subjective evaluations, but rather, are based on statistical comparisons. KPMG fails to disclose that information in the current STP,

and KPMG must do so to provide this Commission with the information necessary to assess the viability of BellSouth's systems when faced with high volumes.

IX. Additional Concerns

The following issues should also be addressed in KPMG's next version of its STP. First, the Table of Contents does not match the paging in the documentation. Second, the STP should also measure and comment on performance measurements for FOC date delivery, Service Order Completion ("SOC") date delivery and timing Jeopardy Notifications that alert a CLEC that an order is in jeopardy. These are all essential milestones for CLECs, and the STP should measure them to ascertain whether BellSouth's performance for CLECs is at parity with its performance for its own retail operations.

CONCLUSION

Covad respectfully requests that the Supplemental Test Plan be revised to incorporate the comments made above.

Respectfully Submitted,

By: _____

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Attorneys for Covad Communications Company

January 31, 2000

Before the
GEORGIA PUBLIC SERVICE COMMISSION
Atlanta, Georgia

In re: **INVESTIGATION INTO DEVELOPMENT OF ELECTRONIC INTERFACES FOR BELLSOUTH TELECOMMUNICATIONS, INC.' S OPERATIONAL SUPPORT SYSTEMS**	Docket No. 8354–U

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the **COMMENTS OF COVAD COMMUNICATIONS REGARDING KPMG' S SUPPLEMENTAL OSS TEST PLAN** via U.S. mail, postage prepaid, upon the following person(s):

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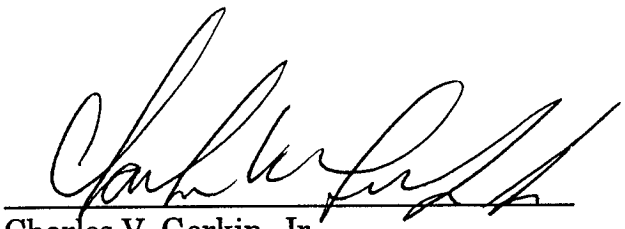
This 31 day of January, 2000.



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January 31, 2000

VIA HAND DELIVERY

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, Room 520
Atlanta, Georgia 30334-5701

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems, Docket No. 8354-U.

Dear Ms. O'Leary:

Enclosed please find for filing an original, fifteen (15) copies and a 3.5" diskette of the Comments of Sprint Communications Company L.P. Regarding Proposed Supplemental Test Plan.

Thank you for your assistance in this matter. Should you have any questions, please feel free to contact me.

Sincerely,

William R. Atkinson

William R. Atkinson

WRA/de
Enclosures
cc: Parties of Record

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In re:		
Investigation Into Development	)	
Of Electronic Interfaces for BellSouth's	)	Docket No. 8354-U
Operational Support Systems	)	

COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P. REGARDING PROPOSED SUPPLEMENTAL TEST PLAN

COMES NOW Sprint Communications Company L.P. ("Sprint"), pursuant to Order of the Georgia Public Service Commission ("Commission") dated January 12, 2000, and submits its Comments on the KPMG/BellSouth Telecommunications, Inc. ("BellSouth") Georgia OSS Evaluation Proposed Supplemental Test Plan Version 1.0 ("Supplemental Test Plan") filed with the Commission on January 24, 2000. The following Comments address certain sections and aspects of the Supplemental Test Plan in the order in which they appear in the January 24, 2000 filing.

COMMENTS

a. BellSouth's request to substitute commercial usage for resale

In the cover letter to the January 24, 2000 Supplemental Test Plan filing, BellSouth requested the Commission not to test the following major applications of Billing, Provisioning, and Maintenance & Repair due to commercial volumes. It has been Sprint's and other competitive local exchange carriers' ("CLECs") experience that incumbent local exchange carrier ("ILEC") commercial volumes do not equate to resale

even though BellSouth claims that its flow-through systems are centralized. For example, despite massive commercial use in the Bell Atlantic New York test, CLECs continue to identify missed billing completion dates and provisioning dates, and complain of inadequate turnaround of CLEC Trouble Tickets – which directly impact the end-user customer.

Sprint believes that it would be a serious oversight not to allow KPMG to test these major applications. A valid OSS test process involves the evaluation of all usable interface components used by the CLECs. Sprint urges the Commission to ensure that short cuts are not allowed in the OSS Georgia evaluation. It would be an unacceptable result to evaluate any software applications and not test the interfaces aligned with the respective systems. Sprint believes that BellSouth tests its internal applications to ensure that end-user customers are not adversely impacted due to commercial volumes. Accordingly, the proposed Supplemental Test Plan should follow the same procedure.

b. Comments regarding Introduction

The Supplemental Test Plan will adopt the "military-style" test philosophy, which utilizes a "test until you pass" approach. Sprint recommends that no defects be allowed to remain in "open" status at the end of the Supplemental Test. Additionally, established guidelines should be set on what constitutes deficiencies and passing grades. In doing so, the Commission will help ensure that the defects are clearly defined and will not be dealt with only after the test. Regression testing will still be necessary in order to ensure that fixes have not adversely impacted existing production software.

KPMG and the Commission should fully understand the deficiencies inherent in the selected method of testing. Interviews, inspections, and historical data will not provide the fact-based results of actual test implementation. In other words, reading about it does not equate to actually testing the process.

c. Comments on Test Plan Framework

BellSouth's OSS documentation should be transaction-based tested to ensure that it allows CLECs to build OSS interfaces that can communicate reliably and accurately with BellSouth's OSS. In other words, electronic interfaces should be built from BellSouth's documentation of the business rules in the processing of a Local Service Request ("LSR").

d. Comments on Pre-ordering, Ordering and Provisioning Test Section

This portion of the Supplemental Test will be executed by submitting LSRs for resale products against BellSouth test bed accounts. Sprint requests that the BellSouth test bed not be pre-defined data, where most or all the data has been scrubbed. In other words, pre-defined data has been tested to successfully flow-through (error free) through BellSouth's legacy systems. It appears that in connection with the Bell Atlantic New York test, pre-defined data was used for validity testing of the respective domains. As a result, KPMG was not successful in discovering error deficiencies in the Bell Atlantic New York legacy systems. Accordingly, Sprint recommends that random data be used.

Sprint requests that "Stand-Alone" Directory transaction (Record Type J) and "Conversion As Specified" (Record Type V) be included in the mix of transactions. It

should be noted that the majority of the CLECs would utilize the "Conversion As Specified" order type due to the ease of order processing. Stand alone directory transactions are equally important to include in the order mix due to the complexity of Directory Listings. As the Commission knows, directory listing is in some respects a "one shot" deal for the consumer and it should be thoroughly tested in the transaction mix. Once the directory is printed, it cannot be changed until the next directory is printed.

Sprint suggests that integrated pre-order and order transactions include pre-order address validation, product/service availability (Customer Service Record), due date availability, and TN reservation as possible test scenarios. In doing so, Pre-Order and Order specifications will clearly indicate a potential discrepancy in matching field structures.

The Provisioning Verification Test will evaluate BellSouth's ability to accurately complete the provisioning of service requests. Sprint recommends that high profile products/services be included in the Provisioning domain. This would include Loops, Unbundled Network Element Platforms ("UNE-Ps"), Hunting, and Complex Services, and the full range of resale products. Sprint has experienced several business rule issues relating to Hunting requirements. Sprint also suggests that KPMG conduct exhaustive test conditions to validate UNE-P requirements.

e. Comments on Billing Test section

As stated above, Sprint requests that the scope of the Supplemental Test Plan include additional order types of "Conversion As Specified" and "Stand Alone" Directories. Additionally, CLECs should be given the opportunity to review those

services identified from the top fifty resale services that do not have significant commercial volume, based on the analysis defined in Appendix B of BellSouth's January 24, 2000 filing.

f. Comments on Change Management Test Section

Supplemental Test activities in Change Management will focus on an evaluation of BellSouth's OSS '99 release. Sprint believes that OSS '99 should also be evaluated in the Pre-Order, Order and Provisioning domains. This is a major software release that CLECs will be utilizing and is currently in production. As a result, software will be updated and should be tested through the appropriate BellSouth systems. An actual implementation into the existing environment will validate the process of Change Management.

The Change Management domain should be tested with upgraded software enhancements to ensure change controls can be adequately processed in the ILEC and CLEC environments. The change control process is extremely important to ensure that BellSouth can upgrade and modify its OSS and interfaces without disrupting CLECs' ability to process the transactions of their customers, and that CLECs are served with sufficient notice to upgrade and modify their systems in concert with the modifications. The change control process also provides a means for CLECs to test their systems and interfaces with the in-production BellSouth systems and interfaces as well as test with the "to-be-released" systems that BellSouth introduces as it makes modifications to the systems under the change control process. Additionally, It has been Sprint's experience that flash announcements in the production environment are lacking the proper detailed

specifications to allow Sprint to successfully implement a production fix. As a result, CLECs can experience significant down time until specifications are clarified.

Sprint encourages KPMG to include an Operational Analysis test on "Escalation Issues". Sprint has experienced severe delays from BellSouth on critical business rule questions/clarification.

CONCLUSION

In recognition of the foregoing, Sprint respectfully requests that the Commission adopt all of the recommendations stated herein, and require BellSouth to submit a revised proposed Supplemental Test Plan incorporating all of Sprint's recommended changes.

Respectfully submitted this 31st day of January, 2000.

Sprint Communications Company L.P.

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Attorneys for Sprint Communications Company L.P.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing Comments of Sprint Communications Company L.P. Regarding Proposed Supplemental Test Plan in Docket No. 8354-U, via United States, first class mail, postage paid and properly addressed to the following:

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This 31st day of Jan, 2000.

Danielle Etzbach
Sprint Communications Company L.P.

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January 31, 2000

VIA HAND DELIVERY

Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Ave. S.W., Room 520
Atlanta, Georgia 30334

Re: In the Matter of: Investigation into Development of Electronic Interfaces for BellSouth's Operations Support Systems; Docket No. 8354-U

Dear Ms. O'Leary:

Enclosed are the original and eleven (11) copies of the attached Comments of Rhythms Links Inc. to KPMG's Supplemental Test Plan ("Comments") in the above-referenced docket.

Also enclosed is a computer diskette containing the Comments in Microsoft Word format. Please file the Comments in your usual fashion and return one (1) file-stamped copy to us in the enclosed envelope.

If you have any questions or comments, please call the undersigned.

Sincerely,

Charles A. Hudak

Enc.

cc: Jeremy D. Marcus, Esq.
Blumenfeld & Cohen

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
	)	
Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems	)	Docket No. 8354-U
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COMMENTS OF RHYTHMS LINKS INC. TO KPMG'S SUPPLEMENTAL TEST PLAN

Rhythms Links Inc. ("Rhythms"), by its attorneys, hereby submits its Comments to KPMG LLP's ("KPMG") BellSouth Telecommunications, Inc. ("BellSouth") – Georgia Supplemental Test Plan, Draft, Version 1.0 ("Supplemental Test Plan") in response to the Georgia Public Service Commission's (the "Commission") January 12, 2000 Order.[1] Rhythms applauds the Commission for expanding the test plan to include testing of BellSouth's "pre-ordering, ordering, and provisioning of xDSL capable loops."[2] Further, consistent with this expansion of the test plan, Rhythms requests that the Commission order the Supplemental Test Plan to be (i) clarified to clearly define the xDSL loops being tested, (ii) revised to test BellSouth's ability to perform pre-ordering, ordering and provisioning of xDSL loop functionalities electronically as well as manually, and (iii) clarified to ensure that BellSouth's ability to provide all necessary loop make-up information during the pre-ordering phase is tested. Finally, the Commission should ensure that KMPG collects at least three (3) months of

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[1] *Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems, Consideration of AT&T's Motion for Reconsideration of the Commission's Order for Third Party Testing*, GPSC Docket No. 8354-U, Order (Jan. 12, 2000).

[2] *Id.* at 2 and 3.

satisfactory data for all of the items evaluated in the Supplemental Test Plan before BellSouth may be considered as having passed the evaluation for the item at issue.

I. INTRODUCTION

Rhythms offers high-speed data transmission services to Georgia consumers by utilizing Digital Subscriber Line ("DSL" or "xDSL") technologies. DSL technologies enable a carrier, such as Rhythms, to use existing copper phone lines to deliver high-speed data and Internet access services. Because xDSL-based services rely on existing phone lines, xDSL-based services can be delivered to virtually all Georgia consumers' homes and businesses more quickly and at less cost than other data services. Rhythms' services can be used for telecommuting, dedicated access to the Internet, and access to Intranet-type networking solutions. Rhythms' provision of xDSL services competes directly with BellSouth's loop-based advanced services.

Rhythms' most prominent competitive advantage over BellSouth's advanced service offerings is Rhythms' ability to provision a variety of xDSL-based services according to the specific needs of each customer. These different types of xDSL include Asymmetric Digital Subscriber Line ("ADSL"), Rate adaptive Asymmetric Digital Subscriber Line ("RADSL"), High bit rate Digital Subscriber Line ("HDSL"), Symmetric Digital Subscriber Line ("SDSL") and ISDN Digital Subscriber Line ("IDSL"). A description of the various types of xDSL services provided by Rhythms is attached at Exhibit "I". The various types of xDSL services allow Rhythms to provide services to customers at locations further from the central office and at faster speeds than BellSouth offers to its customers.

In order to provide those services, Rhythms depends on BellSouth for three primary components. First, Rhythms must lease "clean" copper loops, unfettered by any intervening devices, such as load coils. Second, Rhythms must collocate and maintain its equipment at

BellSouth premises, including BellSouth central offices. Third, Rhythms requires the timely provisioning of unbundled transport facilities from BellSouth. Rhythms must obtain these components in a timely and cost-effective manner to meet customer needs.

Operational Support Systems ("OSS") are the foundation for BellSouth's effective and efficient provisioning of these components of its network, and in particular the provisioning of xDSL loops. Rhythms must be able to obtain unbundled loops, and other unbundled network elements, through real-time, electronic access (whether unrestricted or mediated) to BellSouth's OSS for pre-ordering, ordering and provisioning, maintenance and repair, and billing capabilities. In response to the Commission's January 12 Order, Rhythms will focus its Comments on the testing of BellSouth's OSS capabilities for pre-ordering, ordering and provisioning of unbundled xDSL loops.

II. THE SUPPLEMENTAL TEST PLAN MUST TEST THE PROPER DEFINTION OF AN xDSL CAPABLE LOOP.

Rhythms applauds the Commission for requiring the Supplemental Test Plan to test BellSouth's ability to provide xDSL loops to competitors. Rhythms, however, is concerned that the Supplemental Test Plan does not define the xDSL loops to be tested. The pre-ordering, ordering and provisioning functionalities associated with BellSouth's provision of xDSL loops must be based on the proper definition of an xDSL loop. Unless the Supplemental Test Plan correctly defines an xDSL loop, the testing results will be largely meaningless.

As the Arbitrators in Rhythms' arbitration against Southwestern Bell Telephone Company in Texas recently found, an incumbent local exchange carrier ("ILEC") "should not be allowed to limit the capabilities of xDSL services on an xDSL loop through unnecessarily

complex definitions and restrictions."[3] Instead of a restrictive definition, the Commission should broadly define xDSL loops. Specifically, the Commission should require that KPMG test BellSouth's ability to provide competitive local exchange carriers ("CLECs") with a basic xDSL loop as contemplated by the Federal Communications Commission ("FCC")[4] and the Texas Public Utility Commission. An xDSL loop is simply a copper loop that runs from the BellSouth central office (or other termination point) to the end-user premises that is unfettered by intervening devices, such as load coils or excessive bridged taps.

Consequently, Rhythms recommends that the Commission require KPMG to adopt the following definition of an xDSL loop for KPMG's testing of BellSouth's OSS:

> An xDSL loop supports the transmission of Digital Subscriber Line ("DSL") technologies. The "x" in xDSL is a placeholder for the various types of digital subscriber line services. A loop is a dedicated transmission facility between a distribution frame, or its equivalent, in a BellSouth central office and the network interface device at the customer premises.
>
> An xDSL loop is a plain twisted pair copper loop of unlimited length without intervening devices, such as load coils, repeaters (unless so requested by the requesting carrier), or digital access main lines ("DAMLs"), and which may contain minimal bridged tap of up to 2,500 feet total (all bridged taps) and up to 2,000 feet for a single bridged tap. A copper loop used for such purposes will meet basic electrical standards such as metallic conductivity and capacitive and resistive balance.
>
> In addition, at the requesting carrier's sole request, BellSouth will provide the requesting carrier with other loops of unlimited length, such as fiber based loops or loops that traverse digital loop carrier ("DLC") systems. On any of the loops described, the requesting carrier may provide any service that it chooses so long as such service is in compliance with FCC regulations.

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[3] *Petition of Rhythms Links Inc. for Arbitration to Establish an Interconnection Agreement with Southwestern Bell Telephone Company*, Texas PUC Docket Nos. 20226 et al., Arbitration Award at 11 (Nov. 30, 1999) ("Texas Award"). On January 27, 2000, the Texas Public Utilities Commission ruled from the bench, affirming the overwhelming majority of the Texas Award, including the definition of an xDSL loop. *See infra* note 5.

[4] *See Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking ¶ 172 (rel. Nov. 5, 1999) ("UNE Remand Order").

Utilizing this definition of an xDSL loop will enable KPMG to truly test whether BellSouth is providing CLECs with non-discriminatory access to xDSL loops.[5] If KPMG were, instead, to use a more limited definition of an xDSL loop, BellSouth might be able to pass KPMG's xDSL testing, while CLECs would remain unable to provide the full array of DSL services to Georgia's consumers due to BellSouth's ability to restrict the xDSL loops it provides to CLECs. Accordingly, Rhythms requests the Commission to clarify the Supplemental Test Plan by ordering that the above definition of xDSL loop be used by KPMG in its testing of BellSouth's pre-ordering, ordering and provisioning of xDSL loops.

III. THE COMMISSION SHOULD REVISE THE SUPPLEMENTAL TEST PLAN TO TEST BELLSOUTH'S ABILITY TO PROVIDE xDSL LOOPS USING ELECTRONIC INTERFACES, OR IN THE ALTERNATIVE SHOULD REQUIRE KPMG TO DEVELOP A FURTHER SUPPLEMENTAL TEST PLAN ONCE BELLSOUTH DEVELOPS SUCH ELECTRONIC OSS INTERFACES

The Supplemental Test Plan states that the evaluation scenarios are "designed to depict real-world situations that CLECs currently face or *may face in the near future.*"[6] Yet, the Supplemental Test Plan only tests BellSouth's manual processes for providing xDSL loops. While today BellSouth's OSS do not enable CLECs to pre-order, order or provision xDSL loops

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[5] The Arbitrators in Texas adopted a definition of xDSL loops similar to the one proposed by Rhythms here. Specifically, the Texas Arbitrators defined an xDSL loop as follows:

> A 2-wire xDSL loop (xDSL Loop), for purposes of this section, is a loop that supports the transmission of Digital Subscriber Line (DSL) technologies. The loop is a dedicated transmission facility between a distribution frame, or its equivalent, in a SWBT central office and the network interface device at the customer premises. A copper loop used for such purposes will meet basic electrical standards such as metallic conductivity and capacitive and resistive balance, and will not include load coils or excessive bridged tap. The loop may contain repeaters at [CLEC's] option. The loop cannot be "categorized" based on loop length and limitations cannot be placed on the length of xDSL loops. A portion of an xDSL loop may be provisioned using fiber optic facilities and necessary electronics to provide service in certain situations.

Texas Award at 11. (Excessive bridged tap refers to more than 2,500 feet of bridged tap in the aggregate or more than 2,000 feet for any single bridged tap.) Rhythms could support KPMG's use of this definition instead of the one proposed in the body of these Comments should the Commission prefer this definition.

[6] Supplemental Test Plan at 3 (emphasis added).

electronically, Rhythms expects that in the near future BellSouth's OSS for xDSL loops will become fully electronic. For example, the FCC's UNE Remand Order requires BellSouth to provide CLECs with the loop make-up information[7] that it "has in any of its own databases or other internal records."[8] Rhythms believes that BellSouth is in the process of developing modifications to its OSS interfaces to comply with the mandates of the UNE Remand Order. Accordingly, because the Supplemental Test Plan states that it is designed to test "real-world situations that CLECs . . . may face in the near future," Rhythms requests that the Commission modify the Supplemental Test Plan to include xDSL testing of electronic OSS.

Rhythms, however, recognizes that BellSouth's OSS may not presently be capable of supporting such testing. Indeed, because BellSouth's OSS do not support pre-ordering, ordering, or provisioning of xDSL loops today, Rhythms, as a DSL provider, has had no reason – and indeed has been unable – to build an electronic interface to BellSouth's OSS for the purpose of obtaining xDSL loops. Therefore, should the Commission choose not to modify the Supplemental Test Plan to test BellSouth's ability to provide these OSS functions electronically, Rhythms requests that the Commission require KPMG to develop a further supplemental test plan once BellSouth has completed its development of electronic OSS capability for xDSL loops. Further, if the Commission chooses this alternative approach, Rhythms requests that this Docket remain open until the testing is completed. Only after BellSouth's electronic OSS is fully tested can BellSouth be viewed to comply with the FCC's xDSL OSS testing requirement.[9]

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[7] *See supra* Section IV.

[8] UNE Remand Order ¶ 427. Further, the FCC went on to "clarify that under our existing rules, the relevant inquiry is not whether the retail arm of the incumbent has access to the underlying loop qualification information, but rather whether such information exists anywhere within the incumbent's back office and can be accessed by any of the incumbent LEC's personnel." *Id.* ¶ 430.

[9] *See* Letter of Lawrence E. Strickling, Chief of the Common Carrier Bureau of the FCC, to US West, Inc. (Sept. 27, 1999).

IV. THE MASTER TEST PLAN MUST TEST THE PRE-ORDERING CAPABILITY OF BELLSOUTH'S OSS TO PROVIDE ACCESS TO LOOP MAKE-UP INFORMATION.

In order for Rhythms to provide its DSL services in competition with BellSouth's wholesale DSL services, BellSouth's OSS must furnish Rhythms with sufficient access to all necessary loop make-up data *prior to ordering*.[10] Many of the problems that Rhythms experiences with delayed or rejected loop orders could be eliminated if Rhythms were able to verify prior to ordering that a particular loop facility was capable of transmitting a particular DSL technology to a particular customer's premises. Therefore, KPMG should fashion OSS testing for pre-ordering that fully examines the processes that are involved in pre-ordering and ordering xDSL loops.

Rhythms requires real-time, electronic access to basic loop make-up information. Data competitors must be able to obtain this information during the pre-ordering phase (*i.e.*, at the beginning of the sales process) in order to determine which type of DSL service to provide to a

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[10] Specifically, the FCC's rules require BellSouth to provide loop make-up information during pre-ordering.

> . . . [OSS] functions consist of pre-ordering, ordering, provisioning, maintenance and repair, and billing functions supported by an incumbent LEC's databases and information. An incumbent LEC, as part of its duty to provide access to the pre-ordering function, must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent LEC.

47 C.F. R. § 51.319(g).

> *Pre-ordering and ordering. Pre-ordering and ordering* includes the exchange of information between telecommunications carriers about: current or proposed customer products and services; or unbundled network elements, or some combination thereof. This information includes loop qualification information, such as the composition of the loop material, including but not limited to: fiber optics or copper; the existence, location and type of any electronic or other equipment on the loop, including but not limited to, digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, disturbers in the same binder groups; the loop length, including the length and location of each type of transmission media; the wire gauge(s) of the loop; and the electrical parameters of the loop, which may determine the suitability of the loop for various technologies.

particular end user. In particular, Rhythms must be able to obtain the necessary loop make-up information for all loops that are capable of providing service to a particular end-user. Without this basic information, Rhythms simply cannot make an informed decision as to which loops to obtain from BellSouth and what xDSL services may be provided to particular end-users. By failing to provide competitors with the real-time, electronic access to such loop make-up information, BellSouth inhibits competitors from making these determinations in an efficient manner.

The type of xDSL technology provided by Rhythms to a particular customer depends on the characteristics of particular loops. *See* Exhibit "I". Each technology has specific loop parameters under which it can optimally transmit a digital signal. Further, certain characteristics of a loop facility can hinder or completely prohibit Rhythms' ability to provide its DSL services to its customers. *See* Exhibit "II". For these reasons, Rhythms offers multiple types of DSL services to residential and business consumers in Georgia. As technologies evolve, DSL technical parameters will also change, thereby continually expanding the capabilities of xDSL technologies.

Loop make-up information is essential for Rhythms to determine the appropriate xDSL technology to provide to a particular customer. For example, Rhythms will use a different xDSL technology to provide service to an end user with a very long loop, or a loop served by DLC, than one with a short, clean loop. Rhythms must have this loop make-up information to make its own business decision about the choice of appropriate DSL-based service for the particular loop, as opposed to being forced to rely on BellSouth's determinations of which DSL service Rhythms should deploy.

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47 C.F.R. § 51.5.

Loop make-up information identifies the technical characteristics of the loop. That information should include the following: (i) the loop length with bridged taps, (ii) the loop length without bridged taps, (iii) the length and location of bridges taps, (iv) the loop wire gauge and gauge changes, (v) the presence and location of load coils, (vi) the presence and location of repeaters, (vii) the presence and type of fiber DLC systems and DAMLs, and (viii) the alternative loops serving or capable of serving particular end-user locations.[11] By obtaining such information during the pre-ordering phase, Rhythms can determine the type of DSL service able to be provisioned to a customer, while the customer is on the telephone ordering service from Rhythms.

The information on the length and wire gauge of the loop, as well as the existence and location of load coils, bridged taps, repeaters, and DLC, resides in BellSouth's systems and databases. To ensure that Rhythms' loop orders are not arbitrarily rejected on the alleged grounds that no facilities are available for xDSL-capable loops, it is critical for Rhythms to obtain efficient access to accurate loop make-up information during the pre-ordering phase. Rhythms' access to such information as part of the pre-ordering process would result in benefits to customers, including fewer unnecessary service delays due to CLEC resubmission of orders and more accurate information on the variety of DSL offerings available to the CLEC customer.

For these reasons, Rhythms requests that the Commission require KPMG to include in the Supplemental Test Plan testing of BellSouth's capability to provide loop make-up information to xDSL service competitors during the pre-ordering phase.

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[11] The FCC also recognized these types of loop make-up information to be used for qualification of loops capable of provisioning DSL service, whether electronic or manual. 47 C.F.R. § 51.5; *Application of Ameritech Corp. and SBC Communications Inc. for Consent to Transfer Control of Corporations Holding Commission Licenses and Lines*, CC Docket No. 98-141, Memorandum Opinion and Order, FCC 99-279, Appendix C, Conditions ¶ 20.c.

V. THE COMMISSION SHOULD REQUIRE KPMG TO COLLECT AT LEAST THREE (3) MONTHS OF SATISFACTORY DATA UNDER THE SUPPLEMENTAL TEST PLAN IN ORDER FOR BELLSOUTH TO PASS EACH ITEM IN THE PLAN.

The Commission should require that, in addition to the military style "test until you pass" approach, KPMG be required to obtain at least three (3) months of satisfactory data before KPMG may conclude that BellSouth is passing any item being evaluated under the Supplemental Test Plan. Only by collecting three (3) months or more of testing data can the Commission have any degree of certainty that BellSouth is in fact providing non-discriminatory access to its OSS. Data collected over a shorter period of time simply is not sufficient to satisfy the FCC's requirement that third-party OSS testing be comprehensive, independent and blind.[12] Thus, the Commission should require KPMG to collect, at a minimum, three (3) months worth of data.

WHEREFORE, Rhythms requests that the Commission:

(1) order KPMG to use the definition of an xDSL loop contained herein as KPMG carries out the xDSL testing under the Supplemental Test Plan;

(2) order KPMG to modify the Supplemental Test Plan to include testing of BellSouth's ability to provide real-time, electronic pre-ordering, ordering and provisioning of xDSL loops, or in the alternative order KPMG to develop a further supplemental test plan as soon as BellSouth modifies its OSS to include the capabilities to provide for real-time, electronic pre-ordering, ordering and provisioning of xDSL loops;

(3) clarify the Supplemental Test Plan such that KPMG tests BellSouth's ability to provide CLECs with loop make-up information during the pre-ordering phase;

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[12] *See Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295, Memorandum Opinion and Order ¶ 100 (rel. Dec. 22, 1999).

(4) require KPMG to collect at least three (3) months worth of data for each item being analyzed during the Supplemental Test Plan; and

(5) order such other modifications to the Supplemental Test Plan as the Commission deems appropriate.

Respectfully submitted,

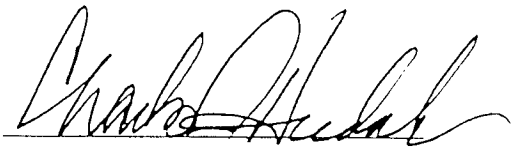
By: 

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EXHIBIT "I"

ADSL was originally developed to support the delivery of entertainment video, or "video dial tone," services over existing copper loops. Such video services require much higher bandwidth in the "downstream" direction (toward the customer premises) than they do in the "upstream" direction (toward the central office), because the video signals being transmitted to the customer's premises require a large amount of bandwidth, and the upstream signal was assumed to be a voice or non-video data signal requiring much less bandwidth. Thus, the need for bandwidth was deemed to be asymmetrical; that is, a high-bandwidth signal in the downstream direction and a lower bandwidth signal in the upstream direction. Even though most (if not all) ILECs have not deployed video dial tone services based on ADSL, this asymmetrical DSL technology has found a new use: Internet access. Internet access tends to display asymmetrical traffic patterns similar to video dial tone services. Most of the traffic flows toward the end user, as graphics-intensive web pages and data files are downloaded. The upstream traffic consists of a few keystrokes and occasional uploads of e-mail and data files. ADSL is designed to achieve a downstream transmission rate of 1.5 Mbps for loops of up to 18,000 feet in length, and a downstream transmission rate of 7 Mbps for loops of up to 6,000 feet in length. The downstream and upstream data signals are transmitted using separate frequencies, and both data streams use frequencies above the frequencies used to transmit voice signals.

RADSL is a type of ADSL. As is the case with other types of ADSL, the downstream and upstream data transmission rates of RADSL are asymmetrical (though it is also possible to configure RADSL for symmetrical data transmission rates). RADSL is more flexible than other types of ADSL because it is rate adaptive; that is, the DSL equipment automatically adjusts the transmission speed to the optimal level achievable on each loop. RADSL can therefore transmit

data at a wide range of transmission speeds, depending on the length and condition of the loop being used. RADSL is designed to achieve a downstream transmission rate of 1.5 Mbps for loops of up to 18,000 feet in length, and a downstream transmission rate of 7 Mbps for loops of up to 9,000 feet in length. The downstream and upstream data signals are transmitted using separate frequencies, and both data streams use frequencies above the frequencies used to transmit voice signals.

SDSL was developed to support symmetrical data transmission rates of up to 1.5 Mbps in each direction. There are several types of SDSL, using a variety of line coding approaches, and supporting variable data transmission rates. SDSL is designed to achieve symmetrical transmission rates of up to 1.5 Mbps for loops that exceed 20,000 feet in length (for one type of SDSL). The downstream and upstream data signals are transmitted using the same frequencies. The data signals use a frequency bandwidth that includes the frequencies used to transmit voice signals. As a result, SDSL-equipped loops cannot be used for simultaneous analog POTS service.

HDSL is also a symmetrical DSL configuration. HDSL supports a data transmission rate of 1.5 Mbps in each direction. Unlike other types of DSL, HDSL requires a 4-wire circuit (that is, two 2-wire loops). HDSL can achieve 1.5 Mbps on loops up to 12,000 feet in length. The downstream and upstream data signals are transmitted using the same frequencies. The data signals use a frequency bandwidth that includes the frequencies used to transmit voice signals. As a result, HDSL-equipped loops cannot be used for simultaneous analog POTS service.

IDSL is a symmetrical DSL configuration. IDSL uses the same coding and parameters as ISDN, a digital data technology that has been in use by BellSouth and other ILECs for quite a while. As a result, IDSL can be deployed on copper or copper/fiber loop plant configurations.

IDSL supports a data transmission rate of 128 Kbps in each direction, on 2-wire loops of up to 35,000 feet in length. As is the case with SDSL and HDSL, IDSL transmits the downstream and upstream data signals using the same frequencies. The data signals use a frequency bandwidth that includes the frequencies used to transmit voice signals. As a result, IDSL-equipped loops cannot be used for simultaneous analog POTS service.

EXHIBIT "II"

First, Rhythms needs to know the existence, number and location of load coils. Under outside plant design rules in place since the 1980s, load coils are devices placed on a copper loop at regular intervals if the loop exceeds a certain length, typically 18,000 feet. Telecommunications signals attenuate, or lose strength, due to the resistance of the copper in the loop; the greater the loop length, the more the attenuation and the weaker the signal received at the customer's premises. Also, attenuation is greater at higher frequencies than at lower frequencies, reducing the quality of the voice signal. Load coils modify the electrical characteristics of a copper loop to overcome the attenuation distortion associated with long loops. None of the xDSL technologies discussed above can be deployed on loops equipped with load coils. The load coils are not compatible with the higher transmission frequencies employed by xDSL technologies.

Second, Rhythms must determine the existence, number, length and location of bridged taps. Bridged taps refer to the ILEC practice of configuring the loop plant in such a way that a single wire pair can be used to serve multiple end-user locations (although not simultaneously). This configuration allows an ILEC to deploy fewer copper facilities all the way to the end user premises, and historically was a method to address the uncertainty of the rate of demand growth in a particular area. Bridged taps create additional degradation for xDSL signals. Bridged taps are used to extend the telephone cable to additional homes so that vacant loops will be available to fulfill customer requests. Any portion of the loop that extends to a customer premises other than that of the requesting customer, and thus is not in the direct talking path to the central office, is called a bridged tap. Bridged taps reduce the amount of the signal that reaches the customer premises, and the effect varies, depending on the bridged-tap length and the frequency spectrum

of the xDSL. xDSL technology can be deployed on a loop equipped with bridged taps, so long as bridged taps are not excessive in length. The total cumulative length of bridged taps on a loop must generally be less than 2,500 feet. Short bridged taps of 200-300 feet located near customer premises can also create problems because of a "tuned resonance" effect.

Third, Rhythms must be able to verify the existence, number and location of repeaters. A repeater is used to boost the signal strength to avoid attenuation on long loops. BellSouth's legacy copper loop plant contains different kinds of repeaters for different types of existing services. Repeaters for analog POTS loops are located in the central office, but are only used on very long loops (in fact, such loops will likely be too long to use for any xDSL-based service other than IDSL). Analog POTS repeaters are used to boost the voice signal and the DC voltage of a POTS circuit. Other types of loops, such as loops used to provide T-1 service, may have repeaters located in the outside loop plant (such repeaters, of course, have little if any relevance to the provisioning of 2-wire xDSL-capable loops). Repeaters must be removed before loops can be used for ADSL, RADSL, SDSL, or HDSL.

Fourth, Rhythms needs to determine the existence and type of DLC appears on the loop facility. Digital Loop Carrier systems involve the multiplexing of telecommunications signals and the carriage of that multiplexed signal on a transmission medium. Although ILECs have historically deployed DLC systems on copper, essentially all DLC systems today are deployed on fiber systems. DLC systems serve two purposes. First, they allow the ILEC to use fewer facilities in the feeder portion of the loop plant. Second, with respect to fiber-based DLC systems, they allow longer loops to be provisioned without the use of load coils. At the present time, particularly with respect to fiber-based DLC systems, xDSL technology (except IDSL) is not compatible with DLC systems.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Comments of Rhythms Links Inc. to KPMG's Supplemental Testing Plan, by depositing same in the United States mail in a properly addressed envelope with adequate postage thereon to insure delivery to the following parties:

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January 31, 2000

BY HAND DELIVERY

Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, Room 520
Atlanta, GA 30334-5701

Re: **Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and fifteen (15) copies of "AT&T's Comments on BellSouth's Supplemental Test Plan" in the above-referenced docket. I have also enclosed a diskette containing the document on Word 6.0. After filing the originals, please return two additional copies stamped "filed".

Thank you for your assistance in this matter.

Very truly yours,

Suzanne W. Ockleberry

Enclosures
cc: Parties of Record

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In re: Investigation Into Development Of Electronic Interfaces For BellSouth's Operational Support Systems	)))	Docket No. 8354-U

AT&T's COMMENTS
ON BELLSOUTH'S SUPPLEMENTAL TEST PLAN

AT&T Communications of the Southern States, Inc. ("AT&T") hereby files its Comments in response to the Supplemental Test Plan ("STP") filed by BellSouth Telecommunications, Inc. ("BellSouth") on January 24, 2000.

AT&T commends this Commission for ordering additional testing of BellSouth's OSS. The STP is a substantial improvement over the Master Test Plan ("MTP") in moving toward a more complete and rigorous third party test. However, the STP requires additional modification as well as additional clarity to meet the needs of CLECs entering the local market and the criteria for third party OSS testing set forth in the September 27, 1999 letter to US West, Inc., from Lawrence E. Strickling, Chief of the FCC's Common Carrier Bureau (the "FCC letter"). Those areas are addressed herein. More detailed concerns with the STP are discussed in Attachment A hereto.[1] A comparison of the STP with the requirements of the FCC letter is included in Attachment B.

[1] This filing deals only with the STP; AT&T previously has noted deficiencies with the MTP.

1.

The BellSouth filing is incomplete and does not comply with the Commission's Order regarding testing of resale services. AT&T makes the following recommendations for improvement:

- The list of proposed products and services for resale functional evaluation and associated volume information should be provided.
- The sections of the STP dependent upon the resale information, including specifically the test scenarios (page 3) and KPMG's analysis of "significant commercial usage" (Appendix B, page 70), should be provided, and the CLEC comment cycle reinitialized.

2.

The Commission – not BellSouth, and not KPMG -- should determine whether "significant commercial usage" exists, and should determine which products and services should be included and/or excluded from the STP. AT&T makes the following recommendation for improvement:

- The STP should be revised to clarify that an objective of the plan is to determine whether current volumes of actual CLEC activities constitute significant commercial usage through testing rather than by declaration.

3.

In its cover letter, BellSouth inappropriately asks the Commission to reconsider its decision to expand the scope of the third party test. The Commission's intent in its Order was to comply with existing FCC guidance, and to provide this Commission with relevant and objective information upon which to base its decisions in considering any future 271 filing BellSouth may elect to make. BellSouth's assertions that, "Thus, we can rely on the commercial usage from frequently resold services and BellSouth's retail services as evidence of functionality for the provisioning, maintenance and repair, and billing systems for resold services without specific commercial usage for particular

services . . . ." is exactly what the Commission is seeking to validate. AT&T makes the following recommendation for improvement:

- The Commission should deny BellSouth's request for reconsideration.

4.

The STP is not in compliance with the guidance provided by the FCC letter to US West including the Performance Metrics Review. (Also see Tab 4 of AT&T's filing on November 5, 1999). AT&T makes the following recommendation for improvement:

- The plan should be modified to comply with the FCC letter, as shown in Attachment B.

5.

The STP should be, but is not, based completely upon the OSS99 suite of interfaces. The STP currently states that "The test will be conducted using the latest BLS interfaces in production for electronic order submission. These interfaces will include TAG (machine to machine) and EDI." Additionally the STP calls for evaluation of the Change Management process associated with the implementation of OSS99. AT&T makes the following recommendation for improvement:

- The STP should be revised to require that the non-OSS99 interfaces used in the MTP be upgraded to OSS99 prior to the initiation of any transaction testing under the STP.

6.

The STP does not set forth the test scenarios that will be included in the test. AT&T makes the following recommendation for improvement:

- Until these test scenarios are provided, the CLEC's right to comment should be preserved and the STP should not be approved for implementation.

7.

The STP calls for increased CLEC participation relative to the MTP, but is inconsistent and insufficient in its descriptions of how such participation will occur in specific tests. AT&T makes the following recommendation for improvement:

- Each test should describe the type and scope of CLEC participation that will be included. For example, in the Change Management Evaluation of OSS99, the test should be revised to show that CLECs that have participated in the development and implementation of OSS99 will be interviewed and may provide documentation of their experience to KPMG for inclusion in the test record.

8.

The scope of testing under the EDI and TAG Functional Tests and Billing Tests omits several types of transactions. AT&T makes the following recommendation for improvement:

- The following types of transactions should be added: 1) conversion as specified;
- 2) feature changes; 3) number changes; 4) additional lines.

9.

In each Test Output Section, the STP calls for reporting "Variance between test performance and the standards of performance defined in BLS methods and procedures." AT&T makes the following recommendation for improvement:

- The variance should be determined between test performance and "measures and criteria identified by the GAPSC" as stated at page 3 of the STP.

10.

The EDI, TAG and Manual Ordering Documentation Evaluation is dependent upon exceptions generated in other tests as its sole source of input, which-limits review of situations that might collectively constitute an exception under the Documentation

Evaluation. AT&T makes the following recommendation for improvement:

- All information that could potentially result in an exception under any other test should be available to the Documentation Evaluation Test.

11.

The documentation listed for review under the Documentation Evaluation Test is pre-OSS99 documentation. AT&T makes the following recommendations for improvement:

- All documentation to be reviewed should be OSS99 reflecting the latest version of interfaces now in production.

12.

The xDSL manual order processing evaluation in Test O&P 15 and the xDSL capacity management evaluation in Test O&P 16 cannot be conducted in isolation from other manual processes performed in the same centers and by the same personnel. AT&T makes the following recommendation for improvement:

- Revise the STP to provide a comprehensive evaluation of the manual ordering center process.

13.

Testing of pre-order functionality for xDSL is not provided for in the STP. AT&T makes the following recommendation for improvement:

- Specific testing activities and evaluation criteria should be established for testing xDSL pre-order functionality including loop pre-qualification.

WHEREFORE, AT&T respectfully requests that the Commission order BellSouth to amend the STP as recommended above, and as shown in the Attachments A and B.

Respectfully submitted this 31st day of January, 2000.

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Attachment A

I. BELLSOUTH'S COVER LETTER

STP Statement	Comment
1. In paragraph 2 of the cover letter, BellSouth states that it will provide the list of proposed products and services for resale functional evaluation until "no later than January 28, 2000."	BellSouth's filing is incomplete. It has not provided the proposed list of products and services requested in the Commission's order. CLECs should be permitted to provide additional comments seven days following the date upon which BellSouth complies with the Commission's order, and that portion of the test should not proceed until CLEC comments are considered.
2. In paragraph 3 of its cover letter, BellSouth states that the Commission's order requires a plan to perform "functional testing of resale pre-ordering, ordering, provisioning, maintenance, and repair billing transactions for the top 50 electronically orderable retail services available for resale that have not experienced significant commercial usage."	BellSouth asserts that the list of services to be tested in the STP complies with the Commission's Order. AT&T believes, however, that the STP would prove more useful to the Commission and to CLECs if it were expanded to include all resold services. Only 52 such services are listed in BellSouth's SQM (in the flow-through metric area), so this expansion would cause little incremental difficulty. Additionally, types of transactions should be tested as well as types of products. Not only do the services themselves need to evaluated, but evaluating the manner in which BellSouth handles those services under various ordering scenarios is also vital. Even the most commonly resold services (e.g. POTS residential) suffer from additional problems when the service is a partial migration, is part of a physical move of service, has a pending order on the account, or includes complex directory listings, among other things.
3. In paragraph 4 of its cover letter, BellSouth states that it has significant commercial usage for resale provisioning, maintenance and repair, and billing and that additional testing for these three areas would be duplicative.	The test should gather evidence of usage so the Commission could determine whether commercial usage levels exist. Neither the FCC nor the DOJ have quantified a level of usage they would consider "commercial". Thus, the FCC and the DOJ have elected not to establish a bright line level, allowing state commissions to make independent determinations based upon the evidence submitted to them – including evidence gathered through third party testing.
4. In paragraph 7 of its cover letter, BellSouth asserts that there is no need for additional system testing downstream of SOCs because "commercial usage from frequently resold services and BellSouth's retail services offer evidence of functionality for provisioning, maintenance and repair, and billing systems for resold services without specific commercial usage for particular services."	In its Order, the Commission intended to expand the range of OSS functionality being tested, but BellSouth attempts to limit the Commission's review of its processes. Rather than accept BellSouth's assertions that its own retail service orders prove functionality for CLEC orders, the Commission should insist that the third party test validate these claims by providing objective evidence. Despite the fact that CLEC resale orders travel through systems in which BellSouth retail orders also travel, they are uniquely coded as CLEC orders

	and may not always receive the same treatment as BellSouth's orders. The third party test should examine these transactions to ensure that they are not treated in a disparate fashion. Examples of instances in which CLEC orders must be identified and accorded specific treatment include the following: • Orders must be identified as either BellSouth or CLEC throughout processing, filtering and security in order to prevent unauthorized access and viewing by BellSouth and other CLECs and to generate external reporting to CLECs for notices such as firm order confirmations, jeopardizes, and completions. • Additionally, when existing services are converted to resale, a number of BellSouth processes and databases must be informed of and updated with the resale CLEC information. • CLEC transactions also have unique status in the maintenance and repair, and billing arenas. Finally, the flow-through data cited by BellSouth actually represents orders in its entire nine state region, not just Georgia. Without independent testing to examine the treatment given to those order, the quantity of orders is not meaningful.

II. THE SUPPLEMENTAL TEST PLAN

5. B. Scope (top of page 3) The results of the test will be compared against measures and criteria identified by the GAPSC and other measures and criteria as deemed appropriate by the GAPSC.	The STP should state when these measures will be established and published. CLECs should have the opportunity to participate in the process of establishing such measures and criteria.
The scenarios will be developed upon determination of the resale products to be tested, based on the process described in Appendix B.	The table of products and services was not provided with this filing, so it is impossible to determine which products and services will be tested. Additionally, the process described in Appendix B allows KPMG to determine what constitutes "significant commercial usage", and then to decide what products and services will be tested: "KPMG will conduct an analysis of the order volumes presented in this table to make an independent determination of which products and features it believes have significant commercial usage. In conducting its analysis, KPMG will consider BLS's proposal as well as GAPSC and CLEC comments on the proposal. KPMG's analysis will be provided to BLS and to all parties of record in Docket No. 8354-U, with sufficient period for comment prior to publication of the final STP." (Appendix B, see page 70) The opportunity for comment is insufficient to overcome this deficiency in the test. Additionally, AT&T believes that the STP could be improved greatly if the Commission were to clarify its Order. In its Order, the Commission limited testing to only those retail services that meet all three of the following criteria: • one of the top 50 retail services available for resale, • electronically orderable, and • without significant commercial usage. With these limitations in place, the test fails to cover such essential areas as services dependent upon manual ordering processes. The test plan should be revised to review all offered resold and UNE services, and all manual ordering processes. The number of items in service provides no assurance that orders for those services are treated in a nondiscriminatory manner. The number of items in service provides no information of the effectiveness, efficiency, or quality of the process by which they came to be in service. Commercial volumes of orders provide no assurance to CLECs or this Commission that those

	orders are being processed in a nondiscriminatory fashion. Rather, order volume is important because CLECs are then in a position to inform the Commission and the FCC of the manner in which BellSouth processed their orders. This Commission already has heard from CLECs that their orders are subject to discriminatory processing. The Commission has the opportunity to include these types of orders in the third party test and gain a more independent assessment of BellSouth's performance. More importantly, a robust third party test should identify problems and aid in their resolution, rather than perpetuate continuing disagreement regarding the quality of BellSouth's performance.
The test will be conducted using the latest BLS interfaces in production for electronic order submission. These interfaces will include TAG (machine-to-machine) and EDI.	It is not clear whether the STP will use OSS99-compliant interfaces (which are the current interfaces in production). Further, the test should specify that the upgrade to OSS99 will be evaluated, which will provide this Commission with valuable information regarding BellSouth's Change Management process.
6. III. A. Test Scenarios (bottom of page 7) A summary of the scenarios will be published in the STP following determination of the products and features to be tested, as described in Appendix B.	The Commission should require KPMG to consult with CLECs when developing Test Scenarios, as called for in the FCC letter to USWest, and should allow for CLEC comment following publication.

7. III. C. Test Processes – CLEC Involvement (middle page 9) CLECs operating in Georgia will be given an opportunity to participate in specified components of this test. The inclusion of selected CLEC live transactions provides an alternative test method for transactions which may not be practical to provide through the test infrastructure, and facilitates a more realistic depiction of real world production. CLEC participation will also be solicited to provide real test cases during the test period. Additionally, KPMG will organize regularly scheduled meetings with the GAPSC and the CLECs to keep interested parties apprised of all relevant aspects of the test activities described in this Supplemental Test Plan, as well as the activities described in the Master Test Plan.	AT&T welcomes this addition to the test. Given the advanced development of the test at this point and the lack of detailed information available in the MTP and STP, however, CLEC involvement may not be sufficient to rectify the impact of excluding the CLECs from an active role in the process in the past. AT&T will comment further as it has more information as to which portions of the testit will have input, and those areas from which it was and will remain excluded. AT&T requests that a copy of the MTP and STP project plans be provided for the Georgia tests. AT&T also requests that CLECs be able to listen and ask clarifying questions during KPMG and BellSouth calls regarding potential and declared exceptions, as they do in tests in other states including Pennsylvania, and Florida.
8. III. D. Evaluation Criteria (bottom of page 9 – mid page 10)	The information in this section does not establish evaluation criteria, although it discusses such criteria in a general manner. According to Appendix A (page 68), the evaluation criteria will be those listed in Appendix D-2 of the MTP. AT&T has already placed on record its serious concerns with the deficiencies of the standards found in Appendix D-2, such as incomplete and inadequate measures, including a lack of retail analogs and benchmarks.
9. General—Performance Measures Review	This portion of the test is a material improvement over previous versions of the test. The improvements include the addition of a review of how data is collected and stored, a review of the change management process for metrics, an evaluation of how data is converted from raw to processed form, and the expansion of metrics replication from the test data to CLEC and retail data. Also, a statistical analysis will be conducted. However, the test is still missing key activities and falls short of the quality of performance reviews conducted in New York and Pennsylvania, and planned for other states, both in the scope of the test and the level of CLEC involvement.

PMR-1 ---Data Collection and Storage Verification and Validation Review	(PMR-1) It does not appear the collection and storage of key information, that is, information that BellSouth excludes from its calculations, is being evaluated.
PMR-2—Metrics Definition Documentation and Implementation Verification and Validation Review.	(PMR-2)This test includes conflicting information regarding the inclusion of an evaluation of the adequacy of BellSouth's measures. It is not clear whether KPMG intends to evaluate the adequacy of BellSouth's measures, which should be done. The STP should specify that CLECs will have the opportunity to be involved in this process. This test also omits an extremely critical area that is also lacking in the current measures for Georgia -- the evaluation of the processes related to standards, i.e. retail analogs and benchmarks for measures. AT&T recommends that, at a minimum, KPMG work with the Georgia PSC, BellSouth, and the CLEC community to establish standards. This work is also underway in Louisiana for permanent measures and in Florida for interim measures. The issue has also been raised in North Carolina workshops. An evaluation of this process of establishing standards would also be needed for the change management test. This test also appears to limit its review to the documentation of metrics definitions, and does not review how those metrics are developed. Such review is part of this test in other jurisdictions. An evaluation of the development process is necessary to determine, among other things, the appropriateness of the assumptions used in the creation of measures, and CLEC input into their development. It is not clear whether the documentation of excluded data is evaluated. The accuracy and completeness of excluded data is vital in the determination of the accuracy of the reported results of the measures. The implementation activities associated with this test appear to be limited to the pseudo-CLEC test data, and do not appear to include CLEC aggregate or retail data. The implementation test is further restricted to examination of only a sub-set of the policies and practices associated with the metrics.

PMR-3—Metrics Change Management Verification and Validation Review	(PMR-3)While including a review of the management of changes to the production and reporting of metrics, this test appears to have omitted the critical step of managing changes to the metrics standards and definitions themselves. Thus, an evaluation of BellSouth's processes of deciding how and when to change what is measured and how it is measured, equally important to how it produces data, is not included. Additionally, this review does not appear to examine for the FCC standards for change management processes.[1] It appears that change management relative to benchmarks has been omitted from the test. This may be related to lack of established benchmarks.
PMR-4---Metrics Data Integrity Verification and Validation Review	(PMR-4) This test appears to omit two essential reviews needed to evaluate data integrity: • It does not appear to include any end-to-end tracking of CLEC orders to insure they were included in the data pool and that each of the resulting transactions executed on those orders were included in BellSouth's metrics calculations. • Additionally, there appears to be no evaluation of the completeness of BellSouth's data used in the calculation of its metrics. For example, there appears to be no review to determine that each LSR received by BellSouth received either a rejection or a firm order confirmation. Without knowing that the data sets are complete, both the data and the resulting calculations on that data lack integrity. Thus, the FCC requirement that an evaluation to determine if the raw data being collected by the RBOC is accurate[2] is not being conducted. The test does not appear to evaluate BellSouth's assertions of "parity by design" for many of its measures.
PMR-5--- Metrics Calculation Verification and Validation Review	(PRM-5) This test appears to omit a critical step conducted as part of this test in other jurisdictions.

[1] See September 27, 1999 FCC letter to US West. The FCC also states in this letter that the change management elements included "would be indicative, but not dispositive, of a satisfactory change management process."
[2] Id.

	This test does not appear to analyze the documentation published by BellSouth about metrics and the consistency between the documentation and the procedures used for calculating metrics. Validation of pseudo-CLEC test data was part of the original test plan but was omitted in the STP. Thus, it appears that this test does not meet the FCC requirement that the "evaluator would assess whether the BOC's data collection and data processing functions are consistent with published performance measurement business rules[3]. AT&T assumes that test data is not included in this test because it was included in the original test plan. However, it is unclear to AT&T if this evaluation will be conducted for resale, which is included in the supplemental test.
PMR-6---Statistical Evaluation of Transactions-Test Metrics	(PMR-6)The statistical evaluation appears to be limited to the data collected by the pseudo-CLEC, and does not include CLEC aggregate data and retail data, which were evaluated in New York. These tests are also critical to a determination if the pseudo-CLEC received special treatment, and treatment of CLECs overall. It is unclear if CLECs will have a role in determining what methodology should be used for the Georgia test. Additionally, a critical deficiency exists for this test as no retail analogs or benchmarks have been established for UNEs, order status and other measures, and resale metrics are insufficiently disaggregated to make appropriate comparisons.
Summary	While the performance measures test for the Georgia MTP has been materially improved, it continues to contain numerous significant flaws that eliminate its ability to adequately examine this issue. Key flaws include: --No evaluation of the accuracy of the collected data. --No review of the SQM documentation processes. --Inadequate review of the retail data and CLEC aggregate data. --No determination that the data used to calculate the metrics is complete, a threshold requirement in

[3] Id.

	determining that reported results have integrity. --No statistical evaluation of the CLEC aggregate or retail data. --Lack of standards (retail analogs or benchmarks) for the performance measures. --Inadequate change management review --Lack of clarity of whether the adequacy of measures will be evaluated. Due to the high-level descriptions in KPMG's test plans, coupled with the lack of CLEC involvement and communication, only the most glaring omissions and deficiencies in the various iterations the test plans could be determined. AT&T requests that it be provided additional information from KPMG regarding its planned evaluation of BellSouth's performance measures in order to make a more comprehensive response to this test.

10. V. C. Scope – page 26 list of order types page 27 - In addition to test orders, the CLECs will be solicited for "live" orders to assist in the testing of *x*DSL services. Agreed upon interface business rules and formats negotiated between BLS and the CLECs will be included in the test transaction formats. Documentation affecting ordering and provisioning of resale and *x*DSL provided to the CLECs will be reviewed as part of the documentation review. EDI Functional Evaluation, page 28 - Orders will be submitted both as stand-alone transactions and as integrated pre-order/order transactions. For a defined set of integrated transactions, information returned on the pre-order response will be used to populate fields on orders. Table V-1, page 29	AT&T requests the addition of the following types of orders: 1) conversion as specified; 2) feature change; 3) number change; 4) add lines. The test also should specify that the tester will examine whether or not the documentation "negotiated" between BLS and CLECs (individually) and that "provided" to the CLECs (collectively) is consistent and therefore usable by all CLECs. AT&T welcomes the pre-order/order integration, which is a significant improvement over the non-integrated, separate, stand-alone transaction testing of pre-ordering and ordering in the MTP. RE: EDI and TAG testing: AT&T requests that the STP include a comparison of wholesale and retail functionality, and requests inclusion of a help desk review. AT&T is concerned that the STP includes no comparison of wholesale and retail metrics identified in the STP. With no comparison to retail, and no benchmarks or appropriate disaggregation, it is unclear how the results of this test will be evaluated.

11. page 31 – Outputs --- Variance between actual test performance and the standards of performance defined in BLS methods and procedures	The standards of performance that should be used are those established by the GA PSC, with input from CLECs, rather than those in BellSouth's practices. This change should be made to all output sections.
12. Test O&P13: Provisioning Verification Evaluation – Table V-3 page 37-38	The STP description of the provisioning process is confusing. For example, the first entry in this table under the process area is "Receive completion notification", but the following entries are all events that precede receiving a completion notice. It also is unclear to what degree the completion notification evaluation will occur, since it appears in the test scope, but not in other activity areas. Timely and complete completion notifications are extremely important to CLECs and should receive a comprehensive evaluation, not only on test data, but on CLEC data as well.
13. Test O&P14: EDI, TAG & MO Documentation Evaluation ---- page 40 ---- The EDI and TAG test will receive input from the O&P-11 and O&P-12: EDI and TAG Functional Test exceptions report. The exception reports are based on issues pertaining to documentation that addresses whether system functionality matches that described in the business rules documentation. The Manual Order test will receive input from the O&P-15: Manual Order Processing Functional Test. The exception reports are based on issues pertaining to documentation that addresses whether the manual process matches that described in the business rules documentation.	This test should be modified to include all issues identified during the functional testing, just as 4.5.1 inputs suggests will be done for provisioning. The STP states that the EDI and TAG documentation evaluation will receive input from the functional exceptions report (as opposed to the functional test). The manual order test, on the other hand, will receive input from the functional test itself (not just the exceptions). The EDI and TAG exceptions report may not provide all the information needed for the test due to the unique exception process in use in GA: KPMG will note an exception only after a number of information exchanges between KPMG and BellSouth. Thus, exceptions noted by KPMG are those issues that were not resolved by BellSouth upon KPMG's prompting. It provides no data regarding BellSouth's resolution of similar issues identified by CLECs.
14. Page 41, Table V-4	The LEO Guide Volume 1 and Volume 4 Issues reference here are EDI7 based, not OSS99, the latest versions now in production. The test should be revised to require KPMG to review the most current issues.
15. Page 43, Test O&P15: xDSL Manual Order Processing Evaluation ---- The Manual Order Processing Functional Test will evaluate the functional elements of the ordering and provisioning process for *x*DSL products as delivered to CLECs	This test (and the following Capacity Management Evaluation xDSL) should not be restricted to xDSL, but should include the full range of required manual processing.

by the manual ordering process.	48% of all CLEC orders submitted to BellSouth are submitted manually, but only BellSouth knows what portion of these orders can only be submitted manually. Additionally, a significant portion of electronically submitted orders fall out to manual process by BellSouth's interface design choices. (6% of orders in November 99; 5% orders in December 99). Further, an additional 8% of electronically submitted orders required manual error correction by BellSouth or the CLECs in November and December 99. All of these orders are processed by the same BellSouth centers and personnel. Therefore an evaluation that is limited to xDSL manual processing fails to provide the Commission with information regarding almost half of the orders currently submitted to BellSouth.
16. Page 43 -- Orders will be submitted as both stand alone transactions and as integrated pre-order /order transactions. Note that although all of the transactions to order *x*DSL products will be submitted manually, the related pre-orders will be submitted electronically or manually, depending on the information required. For a defined set of integrated transactions, information returned on the pre-order response will be used to populate fields on subsequent orders. This activity is undertaken to simulate the system-related activities of a CLEC wishing to integrate the pre-order and order functions.	Despite this paragraph, the STP includes no xDSL pre-ordering test targets. Loop qualification is a particularly critical pre-ordering element for xDSL services, and must be included in the STP. Loop qualification refers to composition of the loop. Such information includes but is not limited to: fiber optics or copper cable; the existence, location and type of any electronic or other equipment on the loop, such as digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, disturbers in the same or adjacent binder groups; the loop length, including the length and location of each type of transmission media, and bridge taps; the wire gauge(s) of the loop; and the electrical parameters of the loop. Collectively this information is used determine the suitability of the loop for various technologies. All xDSL pre-ordering inquiries, either electronic or manual, should be evaluated for timeliness, accuracy, and equivalence to BellSouth's and its affiliate's own functionality. Affiliate functionality is particularly important because BellSouth provides xDSL service through BellSouth.net, an affiliate. Additionally, the STP must address xDSL line sharing; comparison of flow-through for CLEC versus BellSouth or its affiliate's xDSL orders; change types unique to xDSL such as speed, type, or equipment changes; of the treatment of order cancellations when a loop fails to meet qualification requirements.
17. Page 47 – Test O&P16: Cap Mgmt Eval – xDSL	As discussed above, scalability of xDSL must be examined in context. Additonally, there appears to be no testing of xDSL in volume, as required by the FCC Letter to US West.

18. VII Billing Test Section page 58 Scope	AT&T requests the addition of the following types of orders: 1) conversion as specified; 2) feature change; 3) number change; 4) add lines.
19. Page 59 Test BLG8 ---- The test will be executed in conjunction with orders submitted during the execution of the EDI and TAG Functional Evaluations and usage generated during the execution of the Resale Usage Functional Test. Page 61 ---- Customer Service Records (CSRs) reflecting completed order activity resulting from test case transactions will be used to create an expectation of billable charges. Page 61 ---- Two bill periods will be processed for the same set of customers. The first bill period will consist of baseline bills created for the test bed telephone numbers. The second bill period will consist of bills produced after select scenarios have been executed. This set will include charges for test case activity such as conversions, additions, and usage charges for calls generated during the execution of the Functional Usage Evaluation.	AT&T believes this section improves upon the MTP. The STP should specify that content of these CSRs will also be used to determine the accuracy of provisioning and that their timeliness will be measured. Two billing periods is a significant improvement over the MTP, but AT&T believes that three billing periods would be a further improvement.
20. page 62 Test BLG9: Usage ---- Evaluation of the timeliness of delivery of DUFs will be based on the number of calendar days between the record date (not including the call date) and the date the DUF was created. page 63 ---- Calls will include incoming and outgoing intraLATA, interLATA, and international calls.	AT&T believes that evaluation of the timeliness of DUF delivery should be based upon the date the DUF was transmitted to the CLEC, rather than the date the DUF was created. The STP also should include incoming and outgoing local calls.
21. VIII. Change Management Test Section	The development and implementation of the OSS99 Project began in July of 1998, with an initial anticipated implementation in the summer of 1999. At present, a portion of the project has been implemented and the remainder is scheduled for implementation in March 2000. The portion of OSS99 that has been implemented is now the latest version of the pre-ordering and ordering interfaces in production. Since the STP requires "the latest BLS interfaces in production for electronic order submission", KPMG must use the information available as a result of the OSS99 Project to upgrade its pre-OSS99 EDI and TAG interfaces to OSS99 as a part of this test, prior to initiating any of the transaction

	tests in the STP. Additionally, the new section CM2: OSS'99 test must be revised to include interviews and documentation reviews with the CLECs that have participated in the development and implementation of the upgrade. As presently written, interviews are not shown as an evaluation technique and CLEC participation is not mentioned. Performing this upgrade, and interviewing CLECs participating in the process combined with the steps called for in the new CM2: OSS'99 Release Evaluation is required to make this new test meaningful.

Attachment B

Comparison of STP to September 27, 1999 letter from FCC Staff to US West

I. Performance Measures Evaluation

Key Requirements of FCC Letter	Compliance of STP
• An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data.	The performance measures evaluation in the STP does not evaluate the accuracy of the raw data. No end-to-end tracking is conducted. No review is undertaken to determine the completeness of the data used by BST to calculate its metrics.
• The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results.	Appears to be addressed by STP, with some exceptions, such as the storage and documentation of the data excluded by BellSouth.
• The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules.	It appears that this requirement will be not be addressed as the STP **omitted** the following language which normally appears in conjunction with this test "This test will also analyze the documentation published by BellSouth about metrics and the consistency between the documentation and the procedures used for calculating metrics."
• The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved).	Appears to be addressed by STP.
• The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.	Although metrics calculations will be recalculated, it is not clear that this will be done using published business rules.

• We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed.	Other omissions preventing a comprehensive review include: --Lack of standards (retail analogs or benchmarks) for measures --Inadequate change management review. --Lack of clarity whether adequacy of measures will be evaluated. --No statistical evaluation of CLEC aggregate or retail data. --Inadequate review of retail and CLEC aggregate data. --No review of SQM documentation processes. --No verification of BellSouth's many claims of "parity by design." Additionally, BellSouth has not made details of its evaluation available to the public as the FCC encouraged it to do.

II. Change Management Test

Key Requirements of FCC Letter	Compliance of STP
• Review of change management process and procedures • Review of implementation of these procedures. • Evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates • Assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release.	The STP only attempted to address the deficiencies in one area of change management, implementing of a major software release. (See Tab 4 of AT&T November 5, 1999 filing for un-addressed issues regarding change management.) There is no process identified in this test to obtain CLEC input. Additionally, it is unclear if the implemented change (OSS99) will in fact be tested by KPMG in its role as a pseudo-CLEC.

III. xDSL Testing

Key Requirements of FCC Letter	Compliance of STP
The third-party test would test significant volumes of xDSL orders (*i.e.*, xDSL capable loops).	There appears to be no testing "of significant volumes" of xDSL orders as required by FCC. Although mentioned in the description of the test, there is **no** additional information provided regarding pre-ordering to determine the adequacy of the testing of the pre-order functions required to order xDSL service.

Comparison of STP to September 27, 1999 letter from FCC Staff to US West

IV. Normal, High, Stress Volume Testing

Key Requirements of FCC Letter	Compliance of STP
• Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems. The mix of transactions would replicate expected CLEC ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (*i.e.*, through the receipt of order confirmation notice or electronic error notice). "Normal" volumes would be based on the BOC's reasonable estimate, with input from CLECs, of daily order volumes. "High" volumes would be significantly greater than normal volumes and based on the BOC's reasonable estimate, with input from CLECs, of forecasted demand. • Capacity or Stress Testing: The third-party stress test would assess scalability of the BOC's OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems.	The STP did not attempt to address the deficiencies in this area. (See Tab 4 of AT&T November 5, 1999 filing for un-addressed issues regarding volume testing.)

V. Pseudo – CLEC

Key Requirements of FCC Letter	Compliance of STP
If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface ***not only to test the quality of the BOC's documentation*** for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions. The pseudo-CLEC should build the interface(s) using the BOC's documentation and business rules to determine whether any CLEC can build an interface based upon these materials. Third-party testing can be conducted using orders from a combination of	The STP did not attempt to address the deficiencies in this area. (See Tab 4 of AT&T November 5, 1999 filing for un-addressed issues regarding the pseudo-CLEC.)

existing CLECs and a pseudo-CLEC.	

VI. Dissemination of Information

Key Requirements of FCC Letter	Compliance of STP
A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing. Staff proposes the following options for reporting problems: • Report issues as they arise; or • Issue reports pursuant to a specified time-frame (*i.e.*, weekly or bi-weekly); or • Issue an interim report in the middle of the test and a final report at the end. Combinations of these options could provide optimal balance between frequency and detail.	The STP added weekly calls with CLECs with a meeting to be held February 2, 2000. While this addition is positive, Georgia still lags behind the level of communication with CLECs in New York, Pennsylvania, and Florida. The exception process is still flawed, with only summary written information provided, and not until BellSouth has formulated its response. Additionally, there are **many** more issues suggested in the interim reports than appear as exceptions. (See Tab 4 of AT&T November 5, 1999 filing for un-addressed issues regarding the interim reporting process.)

VII. Functionality

Key Requirements of FCC Letter	Compliance of STP
• CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region.	The STP includes no plans for CLEC input into test scenario development.
• Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i.e.*, orders should be actually provisioned), as applicable.	While resale functionality has been added to the test, the details of those resale services to be tested has not been provided. Other deficiencies described in Tab 4 of AT&T November 5, 1999 filing remain.

CERTIFICATE OF SERVICE - Docket No. 8354-U

This is to certify that a copy of **"Comments of AT&T Communications of the Southern States, Inc."** has been served upon the parties of record by depositing a copy of same in the U.S. Mail, postage prepaid, addressed as follows:

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