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333 Commerce Street
Nashville, Tennessee 37201-3300

February 18, 2000

 **BELLSOUTH**

RECEIVED
REGULATORY AUTHORITY
Guy M. Hicks
General Counsel
'00 FEB 18 PM 2 01
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

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

Dear Mr. Waddell:

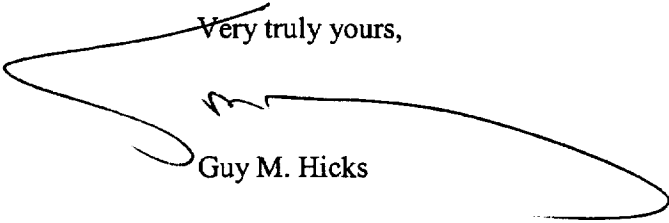
Enclosed please find fourteen copies of the following documents which have been filed with the Georgia Public Service Commission ("GPSC").

Date Filed	Description of Document(s)
February 2, 2000	KPMG's Exceptions 7 and 8 with BellSouth's Responses
February 7, 2000	BellSouth's Supplement to the Proposed Supplemental Test Plan Version 1.0
February 8, 2000	KPMG's Exception 9 with BellSouth's Response
February 10, 2000	KPMG's Exceptions 10, 11, 12, 13 and 14 with BellSouth's Responses
February 14, 2000	KPMG's Amended Exception 9 with BellSouth's Amended Response
February 14, 2000	BellSouth's Amended Response to Exception 12
February 15, 2000	AT&T's Comments on Georgia Third Party Test Developments

David Waddell, Executive Secretary
February 18, 2000
Page 2

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2000, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

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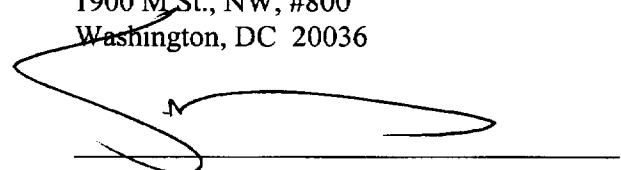
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February 2, 2000

RECEIVED

FEB 02 2000

EXECUTIVE SECRETARY
G.P.S.C.

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

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

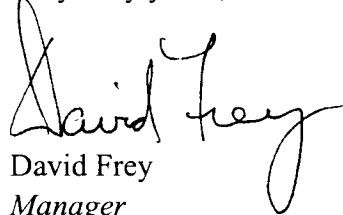
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exceptions 7 and 8 with BellSouth's responses for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,



David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP KPMG LLP a U.S. limited liability partnership is
a member of KPMG International, a Swiss association



EXCEPTION 7

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2). This exception is described below.

Exception:

The BellSouth ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.

BellSouth's ECTA Gateway is designed to allow CLECs to process trouble reports for all designed and non-designed circuits, including SL1 UNEs. The ECTA Gateway routes all trouble tickets to one of two maintenance and repair (M&R) management systems, WFA (for designed circuits) and LMOS (for non-designed circuits). KPMG functional transaction testing identified a defect with ECTA: Entering a trouble report into ECTA for an SL1 circuit generates an error response from the ECTA Gateway, and no trouble ticket is created in either the LMOS or the WFA systems.

Impact

Without the ability to use ECTA to enter a trouble report for an SL1 circuit, a CLEC must call BellSouth in order to report a trouble instance. A trouble report via telephone is neither recorded in, nor accessible through, ECTA. A CLEC, therefore, must use alternative reporting and tracking methods. This decreased functionality can result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.



January 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2). This exception is described below.

Exception:

The BellSouth ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.

BellSouth's ECTA Gateway is designed to allow CLECs to process trouble reports for all designed and non-designed circuits, including SL1 UNEs. The ECTA Gateway routes all trouble tickets to one of two maintenance and repair (M&R) management systems, WFA (for designed circuits) and LMOS (for non-designed circuits). KPMG functional transaction testing identified a defect with ECTA: Entering a trouble report into ECTA for an SL1 circuit generates an error response from the ECTA Gateway, and no trouble ticket is created in either the LMOS or the WFA systems.

Impact

Without the ability to use ECTA to enter a trouble report for an SL1 circuit, a CLEC must call BellSouth in order to report a trouble instance. A trouble report via telephone is neither recorded in, nor accessible through, ECTA. A CLEC, therefore, must use alternative reporting and tracking methods. This decreased functionality can result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.

BST Response

An internal problem with properly processing SL1 reports was corrected on January 6, 2000. SL1 UNE reports have been successfully submitted since the problem was corrected.



EXCEPTION 8

BellSouth Georgia OSS Evaluation

Date: January 12, 2000

EXCEPTION REPORT

An exception has been identified in the electronic order flow process for provisioning of Unbundled Network Elements as a result of the EDI and TAG Functional Test (O&P-1 and O&P-2) and the Provisioning Verification Test (O&P-5).

Exception:

Firm Order Confirmations (FOCs) are issued by BellSouth on CLEC service orders before facility status has been determined.

Through interviews with BellSouth personnel and review of BellSouth documentation, KPMG has discovered that BellSouth issues FOCs on CLEC service orders before facility availability is confirmed. After receiving a valid service order from a CLEC, BellSouth issues a FOC which includes a committed service date. Subsequent to a FOC's issuance, BellSouth's Loop Facilities Assignment Control System (LFACS) attempts to assign a facility to the service order. If the necessary facility is deemed non-available, a PF (Pending Facility) status¹ is issued on a service order and the CLEC is notified of the service order's changed status².

During the course of testing, KPMG received a electronic PF status on December 23, 1999 (FOC had been received on 12/20/99) for PON # 305A112PEH100003. The PF notification was unable to provide an estimated service date.

Impact

Receipt of PF status subsequent to FOC issuance will impact CLECs in the following ways:

- **Customer Satisfaction:** Receipt of an FOC would likely lead a CLEC to immediately notify a customer of a pending service installation on the date specified in the FOC. After notifying the customer, a CLEC could receive a PF notification, indicating that the appropriate facilities are not in place to provision the required service. The CLEC will then have to contact the customer again to explain that service provisioning will be delayed from the original date. Such action will negatively affect CLEC customer satisfaction.

¹ Pending Facility status is issued to service orders where no facility is available for provisioning.

² According to the BellSouth Facility Based Advisory Guide Issue 4.1 – October 22, 1999, Section 4g: H. Firm Order Confirmation, "If there is a post-FOC facility problem, the CLEC will be informed of the estimated service date."



EXCEPTION 8

BellSouth Georgia OSS Evaluation

-
- **Operational Costs:** CLEC will incur resource costs associated with delaying, rescheduling or canceling internal processes related to provisioning services to an end-user customer.



January 18, 2000

EXCEPTION REPORT

An exception has been identified in the electronic order flow process for provisioning of Unbundled Network Elements as a result of the EDI and TAG Functional Test (O&P-1 and O&P-2) and the Provisioning Verification Test (O&P-5).

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- **Customer Satisfaction:** Receipt of an FOC would likely lead a CLEC to immediately notify a customer of a pending service installation on the date specified in the FOC. After notifying the customer, a CLEC could receive a PF notification, indicating that the appropriate facilities are not in place to provision the required service. The CLEC will then have to contact the customer again to explain that service provisioning will be delayed from the original date. Such action will negatively affect CLEC customer satisfaction.
- **Operational Costs:** CLEC will incur resource costs associated with delaying, rescheduling or canceling internal processes related to provisioning services to an end-user customer.

BST Response

BellSouth is providing parity of service to retail and CLEC customers. A Firm Order Confirmation, FOC, is returned to the CLEC when an error free service order is generated. A firm due date is provided to retail customers when an error free service order is submitted to the Service Order Communications System, SOCS. If a jeopardy condition arises for a CLEC, a Jeopardy Notice is sent to the CLEC. If a jeopardy condition arises for a retail customer, the retail service representative attempts to contact the customer to inform them of the jeopardy condition. The electronic notification given to the CLEC assures that the CLEC is notified. Manual calls to retail customers do not have as high of a success rate for notification; thus BellSouth is providing favorable notification service to the CLEC.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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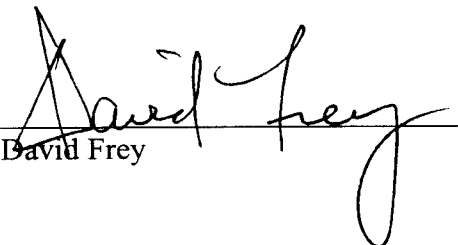
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This 2nd day of February 2000.


David Frey

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Fred McCallum Jr.
General Counsel - Georgia

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February 7, 2000

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FEB 07 2000

EXECUTIVE SECRETARY
G.P.S.C.

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

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

Dear Ms. O'Leary:

Enclosed for filing are an original and twenty-eight copies, as well as an electronic copy, of BellSouth Telecommunications, Inc.'s supplement to the Proposed Supplemental Test Plan, Version 1.0, in the above-referenced matter. I would appreciate your filing same and returning three copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Attached are two spreadsheets (Exhibits 1 and 2) that are referenced in Appendix B, Subsection B to the Supplemental Test Plan that was filed on January 24, 2000. The first spreadsheet shows the Top 50 resold services. Approximately 33 of these are electronically orderable. These are categorized on the top of the list. The electronically orderable services are broken down into two categories, Foundation Services and Features. These Foundation Services are the core services that are used in the first instance by a reseller to provide service to an end user, such as a business line, a residence line, a PBX trunk, and a Synchronet line. The Features, such as Custom Calling and Touchstar, are added on to a customer's Foundation Service. Also included in these spreadsheets are the in-service numbers for the Foundation Services and Features for the 1999 year.

Also attached is a table (Exhibit 3) showing the current monthly volume for BellSouth's CLEC interfaces through January 25, 2000. BellSouth proposes to test all of the electronically orderable top 50 resale services for pre-ordering and ordering, using EDI for residence and business and TAG for business. This proposal is based on the use of 5,000 Local Service Requests per month per interface as the measure for commercial

Ms. Helen O'Leary
February 7, 2000
Page Two

usage on the electronic interfaces. Applying this test to the month-to-date volumes for January results in testing EDI for residence and business, and TAG for business.

For the end-to-end testing, which includes preordering, ordering, as well as the downstream functions of provisioning, billing, and maintenance and repair, BellSouth proposes to focus on those Foundation Services that are used by CLECs to provide service to their customers in the first instance. For these services, BellSouth proposes to define commercial usage either 5% of the associated retail volume or more than 10,000 units in service. Applying this test, BellSouth would perform end-to-end testing for the Measure Rate Business Line, the Measured Rate Residence line, the Flat Rate PBX Trunk, the Measure Rate PBX Trunk, the ISDN Basic Rate Line, and Synchronet. In addition, this end-to-end testing will also include various Features that are typically ordered in conjunction with each of these services.

To the extent applicable, the remaining Features are identical for all of the Foundation Services. Of course, not all of these Features are available for all Foundation Services. However, as can be seen from the spreadsheet, significant numbers of most of these Features have been provided. Of course, all of these Features will be tested for pre-ordering and ordering in conjunction with the interface testing described above. However, based on the units in service for these Features BellSouth would not propose end-to-end testing for them.

Finally, we believe that KPMG will support this approach to the testing of resold services under the Supplemental Test Plan.

Very truly yours,


Fred McCallum Jr.

FJM:nvd
Attachments

cc: Parties of Record

196134/196166/196173

Top 50 services, electronically orderable		IN SERVICE QUANTITIES END OF PERIOD												% retail
Type	Classification	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	
Retail Lines	Business Line	156,711	160,275	165,212	168,923	171,011	171,694	170,804	170,501	172,678	174,965	180,417	187,065	6%
Retail Lines	Business Line	2,860	2,846	3,071	3,104	3,070	2,968	2,802	2,829	2,831	2,837	2,614	2,849	3%
Retail Lines	ISDN Individual Line	1,841	1,902	1,963	2,062	2,164	2,225	2,258	2,325	2,414	2,484	2,601	2,678	2%
Retail Lines	PRX Trunk	7,783	7,827	7,928	8,137	8,377	8,602	8,648	8,678	8,811	8,978	9,382	9,817	3%
Retail Lines	PRX Trunk	6,066	6,089	6,321	6,208	6,287	7,038	7,004	6,947	7,524	7,486	7,575	7,739	4%
Retail Lines	Residence Line	253,965	272,164	288,571	296,313	292,073	291,936	291,147	292,395	298,648	303,179	311,458	314,214	3%
Retail Lines	Residence Line	1,981	1,907	1,822	1,851	1,797	1,738	1,701	1,668	1,629	1,615	1,614	1,683	0.30%
Retail Other Services	Business Data Services	432	483	525	544	549	584	607	625	636	644	642	644	0.50%
Retail Lines	Residence Line	27,450	27,869	28,377	31,780	30,437	30,355	29,448	27,483	26,949	25,322	25,395	25,358	
Retail Other Services	Business Services	7,923	7,929	8,065	8,382	8,558	8,746	8,712	8,789	8,823	9,044	9,328	9,502	
Retail Other Services	Business Services	3,965	3,989	4,112	4,335	4,199	4,358	4,505	4,843	4,817	4,904	4,999	5,239	
Retail Other Services	Vertical Services	167,745	173,559	179,960	195,106	190,614	191,292	189,286	194,517	185,789	181,501	185,595	189,053	
Retail Other Services	Vertical Services	557,694	592,029	625,566	642,704	632,956	630,500	625,429	621,312	630,920	633,178	648,759	655,636	
Retail Other Services	Vertical Services	12	13	15	18	17	16	14	11	9	7	6	6	
Retail Other Services	Vertical Services	8,434	8,471	8,272	8,319	8,297	8,159	7,888	7,510	7,235	6,741	6,734	6,876	
Retail Other Services	Vertical Services	15,160	15,506	15,923	16,319	17,675	17,771	17,277	16,398	16,278	15,332	15,609	15,819	
Retail Other Services	Vertical Services	22,616	23,036	23,296	24,596	24,209	24,293	24,336	23,893	23,689	23,135	23,751	24,417	
Retail Other Services	Vertical Services	447	471	505	522	537	542	569	615	634	677	789	846	
Note: Retail does not track some of the sub-individual features/services separately.														
Top 50 services, not electronically orderable														
Retail Other Services	Business Data Services	9	9	9	6	6	6	6	6	5	5	5	4	
Retail Other Services	Business Data Services	237	225	282	284	267	267	265	261	260	260	242	248	
Retail Other Services	Business Data Services	520	614	696	754	613	1263	1367	1499	1603	1719	1882	2042	
Retail Other Services	Business Data Services	5	5	6	7	9	15	15	15	14	7	1	1	
Retail Other Services	Business Data Services	937	1009	1076	1135	1236	1341	1482	1592	1690	1495	1556	1630	
Retail Other Services	Business Data Services	65	67	69	70	70	73	73	72	70	70	67	64	
Retail Other Services	Business Data Services	6	6	2	3	2	0	0	0	0	0	0	0	
Retail Other Services	Business Data Services	0	0	0	0	0	7	5	5	0	0	0	0	
Retail Other Services	Business Data Services	8	12	12	16	16	5	5	4	2	1	1	1	
Retail Other Services	Business Data Services	0	0	0	0	0	15	5	5	5	5	5	103	
Retail Other Services	Miscellaneous Other	no data	no data	628	650	654	715	681	683	703	717	737	787	
Retail Other Services	Miscellaneous Other	593	613	789	796	830	872	866	866	856	790	759	746	
Retail Other Services	Miscellaneous Other	684	737	789	796	830	872	866	866	856	790	759	746	
Retail Other Services	Miscellaneous Other	4594	4706	4752	4700	4738	4866	4786	4817	4926	4867	5152	5254	
Retail Other Services	Business Services	62336	64692	67401	68949	70299	71890	73348	75266	77365	78653	83118	86293	
Retail Lines	Residence Line	3344	3321	3372	3416	3315	3428	3471	3693	3689	3622	4136	4310	
Retail Lines	Multiserv Line													

Note: Retail does not track some of the sub-individual features/services separately.

IN SERVICE QUANTITIES END OF PERIOD

Type	Classification	IN SERVICE QUANTITIES	END OF PERIOD												Dec-99
			Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99		
Retail Lines	Foundation Services	FLAT RATE BUSINESS	3,100,330	3,102,559	3,103,439	3,103,779	3,106,876	3,100,486	3,089,508	3,078,544	3,069,333	3,059,210	3,045,927	3,033,107	
Retail Lines	Business Line	MSG/MS RATE BUS	98,411	97,988	96,819	96,112	95,927	94,965	94,278	93,531	91,637	90,809	90,211		
Retail Lines	ISDN Individual Line	ISDN INDIVIDUAL LINE	100,772	102,699	104,754	106,744	108,418	109,966	111,628	114,208	117,428	119,315	120,632		
Retail Lines	PBX Trunk	FLAT RATE PBX TRUNKS/NARS	335,664	334,049	333,433	332,296	330,685	328,796	325,235	320,267	316,426	313,894	312,926		
Retail Lines	PBX Trunk	MSG/MS RATE PBX	213,743	214,464	214,073	214,394	213,007	209,970	205,725	201,237	197,595	192,404	190,107		
Retail Lines	Residence Line	FLAT RATE RESIDENCE	9,663,079	9,565,421	9,436,155	9,372,166	9,319,882	9,313,069	9,311,694	9,333,660	9,336,565	9,327,358	9,338,878		
Retail Lines	Residence Line	MSG/MS RATE RES	644,605	637,778	629,005	622,434	618,707	613,506	607,439	600,427	592,945	583,928	569,948		
Retail Other Services	Business Data Services	SYNCHRONET	147,966	147,731	146,633	146,042	136,968	134,014	133,390	132,936	132,378	131,581	130,958		
Retail Lines	Features	INTEGRATED PKG-AREA PLUS	3,813,398	4,048,237	4,310,106	4,431,148	4,492,244	4,508,991	4,583,697	4,628,937	4,670,182	4,702,322	4,732,263		
Retail Other Services	Business Line	OPT CALL PLAN (OCP)	491,598	509,062	524,801	535,171	541,508	538,793	524,273	528,871	531,083	548,492	551,028		
Retail Other Services	Business Services	REMOTE CALL FWD	186,711	187,882	188,922	189,272	190,996	193,634	197,041	199,361	199,257	200,306	203,500		
Retail Other Services	Vertical Services	TOUCHSTAR	16,235,323	16,871,189	17,602,413	17,988,515	18,107,808	18,270,110	18,451,733	18,607,774	18,772,782	18,918,000	19,027,138		
Retail Other Services	Vertical Services	CUSTOM CALLING	21,896,962	22,641,633	22,641,690	22,863,069	22,985,487	22,982,248	23,061,126	23,114,057	23,150,686	23,220,423	23,293,114		
Retail Other Services	Vertical Services	VISUAL DIRECTOR	4,237	4,111	3,946	3,816	3,701	3,591	3,476	3,361	3,270	3,160	2,860		
Retail Other Services	Vertical Services	RINGMASTER	882,219	895,473	910,216	918,816	927,069	921,268	920,547	920,516	920,516	917,621	915,264		
Retail Other Services	Vertical Services	CALL WAITING DELUXE	2,598,431	2,598,431	2,880,529	3,009,545	3,083,854	3,128,263	3,180,221	3,240,957	3,295,867	3,342,736	3,432,100		
Retail Other Services	Vertical Services	MEMORYCALL SERVICE	2,561,814	2,608,961	2,656,476	2,687,204	2,713,109	2,711,878	2,715,878	2,723,835	2,728,582	2,730,011	2,738,200		
Retail Other Services	Vertical Services	ENHANCED CALLERID (ST-UP)	34,264	35,683	37,564	39,801	41,345	44,995	53,048	56,628	60,153	63,045	65,313		
Retail Other Services	Business Data Services	ACCUPLUSE	1932	1909	1867	1843	1821	1784	1742	1710	1680	1648	1574		
Retail Other Services	Business Data Services	FLEXSERV	53682	53334	53976	53937	52905	52459	52332	52332	52272	52272	51914		
Retail Other Services	Business Data Services	FRAME RELAY	31013	31647	32354	33026	33699	41810	43154	44560	45641	47798	48802		
Retail Other Services	Business Data Services	LIGHTGATE	425	432	438	446	461	482	490	499	500	520	539		
Retail Other Services	Business Data Services	BUSINESS DATA SERVICES	80855	82009	81970	82867	83725	85635	86842	88092	89732	90689	92450		
Retail Other Services	Business Data Services	MEGALINK ISDN	4229	4229	4239	4141	4130	4207	3931	3548	3175	3080	3007		
Retail Other Services	Business Data Services	NATIVE MODE LAN INTERCONNECTION	916	929	907	914	925	960	983	982	989	1001	1010		
Retail Other Services	Business Data Services	SMARTPATH	259	240	240	241	1905	1946	1920	1907	1920	1905	1905		
Retail Other Services	Business Data Services	SMARTRING	1302	1342	1379	1390	1438	476	485	503	520	550	562		
Retail Other Services	Miscellaneous Other	CENTREX/ESSX	0	0	0	0	0	326	325	720	1702	5761	36858		
Retail Other Services	Miscellaneous Other	IDENTISUAL	no data												
Retail Other Services	Miscellaneous Other	INDEPENDENT PAYPHONE PROVIDER	61745	61434	61163	60707	61766	61677	60863	60603	60200	60099	58381		
Retail Other Services	Miscellaneous Other	OFF PREMISE EXTENSIONS (OPX)	18423	19553	21021	22236	23419	24945	26132	27373	28962	30480	32931		
Retail Other Services	Miscellaneous Other	PRIMARY RATE ISDN													
Retail Other Services	Business Services	DID	272938	271975	271102	268372	266121	259546	235139	227069	224724	221995	219758		
Retail Lines	Residence Line	INTEGRATED PACKAGES	3220421	3190221	3140471	3088673	3088673	3070111	3045059	3034482	3014707	2983433	2941940		
Retail Lines	Multiserv	MULTISERV	199608	199829	1995453	200066	199119	198003	198686	197848	195625	192239	185420		

BellSouth CLEC OSS Interfaces and Processing
Current Volumes (Jan. 25, 2000 month to date)

INTERFACE				Electronic Processing
EDI	TAG	LENS	MANUAL	
2,246	38, 329	94, 154	33,244	Resale - Simple Residential 167,973
1,332	1,152	4,101	5,804	Resale - Simple Business 12,379
2,803	1,078	221	18,504	UNEs (incl NP) 22,606
6,371	40,559	98,476	57,552	TOTALS 202,958

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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Daniel Walsh
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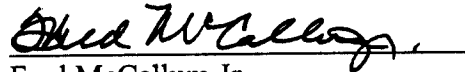
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William R. Atkinson
Sprint Communications Co. L.P.
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Atlanta, GA 30339

This 7th day of February, 2000.


Fred McCallum Jr.

BellSouth Telecommunications, Inc.
125 Perimeter Center West, Suite 376
Atlanta, Georgia 30346
(770) 391-2416

107983



303 Peachtree Street, N.E.
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Atlanta, GA 30308

Telephone 404 222 3000
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FEB 08 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

February 8, 2000

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

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

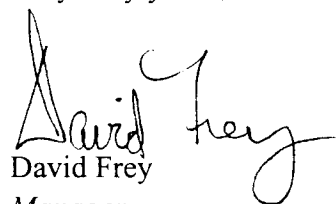
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exception 9 along with BellSouth's response for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record





EXCEPTION 9

BellSouth Georgia OSS Testing Evaluation

Date: January 20, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG did not receive an electronically-delivered FOC or CN¹ for service orders that BellSouth has generated and completed. The following table provides specific data on these instances. The 5th column (BLS FOC Date) lists the date and time the service order entered SOCS.

PON	CC	Date/Time LSR Submitted	Date FA Rcvd	BLS Service Order Entry Date	KPMG Comments
627A214PEJ100001	9991	12/8/99 12:32pm	12/8/99 12:40pm	12/08/99 1:50pm	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
443A224PEM000002	9991	12/13/99 4:51pm	12/13/99 4:55pm	12/17/99 8:00am	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
454A126PTF100003	9991	12/22/99 1:26pm	12/22/99 1:26pm	12/22/99 3:02pm	No FOC or CN received as of 1/20/00.
204A211PTN100003	9994	12/29/99 1:15pm	12/29/99 1:15pm	1/3/00 10:39am	FOC was received 1/3/00 12:47pm on version 00. Supplemental LSR

¹ CNs are only expected on orders for which FOCs are received.



EXCEPTION 9

BellSouth Georgia OSS Testing Evaluation

PON	CC	Date/Time LSR Submitted	Date FA Rcvd	BLS Service Order Entry Date	KPMG Comments
					(version 01) was submitted and acknowledged on 1/10/00. No FOC or CN has been delivered as of 1/20/00.
440A124PEM100003	9991	1/12/00 9:02am	1/12/00 10:01am	1/12/00 12:52pm	No FOC or CN received as of 1/20/00.
454A126PEF000004	9991	1/12/00 2:02pm	1/12/00 2:17pm	1/18/00 5:20pm	KPMG received 2 Clarifications (CLRs) on 1/12 and 1/18. No FOC or CN received as of 1/20/00.
387A225PEG100001	9992	1/12/00 9:03am	1/12/00 10:01am	1/12/00	No FOC or CN received as of 1/20/00.

Notes:

1. PON = Purchase Order Number
2. CC = Company Code
3. LSR = Local Service Request
4. FA = Functional Acknowledgement, an electronic notification to CLECs that BellSouth has received the LSR file.

Impact

The absence of electronic delivery of FOC or CN responses to valid service requests submitted via an electronic interface will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** Without an electronic FOC response, a CLEC cannot confirm, in a timely manner, that BellSouth has received a valid service request and that an internal BellSouth service order has been generated. A CLEC is unable to confirm a requested service delivery date and cannot communicate the date of expected service installation to its end user customer. The inability for a CLEC to commit to an expected service date will negatively affect a customer's perception of the CLEC's service capabilities.
- **Increase in operating costs.** If no electronic FOC or CN is received, CLEC personnel will be forced to pursue the status of these service orders. This will require additional time, effort and cost by the CLEC.



January 28, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG did not receive an electronically-delivered FOC or CN¹ for service orders that BellSouth has generated and completed. The following table provides specific data on these instances. The 5th column (BLS FOC Date) lists the date and time the service order entered SOCS.

PON	CC	Date/Time LSR Submitted	Date FA Rcvd	BLS Service Order Entry Date	KPMG Comments
627A214PEJ100001	9991	12/8/99 12:32pm	12/8/99 12:40pm	12/08/99 1:50pm	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
443A224PEM000002	9991	12/13/99 4:51pm	12/13/99 4:55pm	12/17/99 8:00am	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
454A126PTF100003	9991	12/22/99 1:26pm	12/22/99 1:26pm	12/22/99 3:02pm	No FOC or CN received as of 1/20/00.
204A211PTN100003	9994	12/29/99 1:15pm	12/29/99 1:15pm	1/3/00 10:39am	FOC was received 1/3/00 12:47pm on version 00.

¹ CNs are only expected on orders for which FOCs are received.

PON	CC	Date/Time LSR Submitted	Date FA Rcvd	BLS Service Order Entry Date	KPMG Comments
					Supplemental LSR (version 01) was submitted and acknowledged on 1/10/00. No FOC or CN has been delivered as of 1/20/00.
440A124PEM100003	9991	1/12/00 9:02am	1/12/00 10:01am	1/12/00 12:52pm	No FOC or CN received as of 1/20/00.
454A126PEF000004	9991	1/12/00 2:02pm	1/12/00 2:17pm	1/18/00 5:20pm	KPMG received 2 Clarifications (CLRs) on 1/12 and 1/18. No FOC or CN received as of 1/20/00.
387A225PEG100001	9992	1/12/00 9:03am	1/12/00 10:01am	1/12/00	No FOC or CN received as of 1/20/00.

Notes:

1. PON = Purchase Order Number
2. CC = Company Code
3. LSR = Local Service Request
4. FA = Functional Acknowledgement, an electronic notification to CLECs that BellSouth has received the LSR file.

Impact

The absence of electronic delivery of FOC or CN responses to valid service requests submitted via an electronic interface will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** Without an electronic FOC response, a CLEC cannot confirm, in a timely manner, that BellSouth has received a valid service request and that an internal BellSouth service order has been generated. A CLEC is unable to confirm a requested service delivery date and cannot communicate the date of expected service installation to its end user customer. The inability for a CLEC to commit to an expected service date will negatively affect a customer's perception of the CLEC's service capabilities.
- **Increase in operating costs.** If no electronic FOC or CN is received, CLEC personnel will be forced to pursue the status of these service orders. This will require additional time, effort and cost by the CLEC.

BST Response

Specific criteria must be present on an error-free service order for a Firm Order Confirmation and Completion Notice to be sent electronically. The criteria is the following fields must be present on the SOCS service order to trigger a FOC or CN:

AECN (UNE)

Sales Code begins with "YAXQ"

PON

MAN (UNE)

RESH (RESALE)

RMKR

On the seven PONs listed above, six failed to meet the criteria for a FOC or CN. BellSouth has not received PON 387A225PEG100001 CC 9992.

Service representatives in the Local Carrier Centers have been retrained on how to properly handle requests that fall out for manual processing to comply with our policy to provide FOCs and CNs within specified timeframes.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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This 8th day of February 2000.


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FEB 10 2000

EXECUTIVE SECRETARY
G.P.S.C.

February 10, 2000

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

**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 twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exceptions 10, 11, 12, 13 and 14 with BellSouth's responses for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record





EXCEPTION 10

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

Exception:

Under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described by the *CLEC TAFI End-User Training and User Guide*.

During functional testing, one scenario required a subsequent trouble report to be removed from the TAFI queue and canceled. Testers were unable to cancel or close the subsequent report, as instructed in the *CLEC TAFI End User Training and User Guide*, after it had been removed from the queue. According to the guide, a subsequent report can be canceled or closed by one of the following methods:

- 1) Answering "yes" to the first subsequent report flow question, "Is this cancel report/okay closeout?"
- 2) Choosing to override TAFI's recommendation using the F12 Limited Sub Override menu and selecting *cancel* or *close*.
- 3) Selecting *cancel* or *close* from the F12 Sub Override menu for a report for which TAFI has not determined a recommended disposition.

Initially, when the ticket was removed from the queue, TAFI presented testers with the flow question described in method one above. However, when testers selected "yes," the TAFI recommendation on the trouble report screen did not reflect the documented "TOK per customer recommendation." Instead, it stated, "Updating narrative/status information." As TAFI did not recognize the cancellation in the recommendation field, testers had to use the F12 Limited Sub Override as described in method two above to change the recommendation to one that would cancel the report. Upon selection of one of the two cancel options, the TAFI recommendation changed in the trouble ticket as documented, indicating that the ticket would close out. However, after submitting the ticket, testers re-entered the TN to confirm cancellation and found that the ticket had not been cancelled. Testers repeated this scenario with another TN during dial-up testing as well, and experienced the same results.

In a separate scenario, while testing the Multiple Trouble Report function in M & R-1, testers were unable to cancel two submitted trouble tickets. As described in method one above, testers were unable to cancel the tickets by answering "yes" to the subsequent report flow question, "Is this cancel report/okay closeout?" or through the use of the F12 Sub Limited Override menu. Again, the tickets appeared to the user to be cancelled. However, when the TNs were re-entered for verification, the trouble tickets had not been



EXCEPTION 10

BellSouth Georgia OSS Testing Evaluation

cancelled. Testers were forced to call the Resale Service Center (RSC) in order to cancel these tickets.

Impact

CLECs that are unable to cancel a trouble report as directed in the *CLEC TAFI End-User Training and User Guide* would be impacted in the following ways:

- **Decreasing CLEC customer satisfaction:** A CLEC would not be aware that a ticket had not been canceled unless they had cause to re-enter the TN in TAFI, and noticed that a subsequent report was retrieved, rather than a repeat report. If a CLEC is unaware that a report has not been canceled, the trouble ticket will continue to flow through the system. Depending on the recommendations on the ticket, this might cause BellSouth to take action such as dispatching a technician to perform unwanted or unnecessary work. Unnecessary or unwanted action to CLEC customer accounts would decrease CLEC customer satisfaction.
- **Increasing CLEC operating costs:** If unnecessary or unwanted service calls are made due to improperly canceled trouble tickets, the CLEC would be billed for these service calls. Additionally, if a CLEC is unable to cancel a customer's report using TAFI, CLEC customer service personnel would be required to call the Business Resale Service Center. This would require additional time and effort, and therefore cost, by the CLEC.



January 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

Exception:

Under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described by the *CLEC TAFI End-User Training and User Guide*.

During functional testing, one scenario required a subsequent trouble report to be removed from the TAFI queue and canceled. Testers were unable to cancel or close the subsequent report, as instructed in the *CLEC TAFI End User Training and User Guide*, after it had been removed from the queue. According to the guide, a subsequent report can be canceled or closed by one of the following methods:

- 1) Answering "yes" to the first subsequent report flow question, "Is this cancel report/okay closeout?"
- 2) Choosing to override TAFI's recommendation using the F12 Limited Sub Override menu and selecting *cancel* or *close*.
- 3) Selecting *cancel* or *close* from the F12 Sub Override menu for a report for which TAFI has not determined a recommended disposition.

Initially, when the ticket was removed from the queue, TAFI presented testers with the flow question described in method one above. However, when testers selected "yes," the TAFI recommendation on the trouble report screen did not reflect the documented "TOK per customer recommendation." Instead, it stated, "Updating narrative/status information." As TAFI did not recognize the cancellation in the recommendation field, testers had to use the F12 Limited Sub Override as described in method two above to change the recommendation to one that would cancel the report. Upon selection of one of the two cancel options, the TAFI recommendation changed in the trouble ticket as documented, indicating that the ticket would close out. However, after submitting the ticket, testers re-entered the TN to confirm cancellation and found that the ticket had not been cancelled. Testers repeated this scenario with another TN during dial-up testing as well, and experienced the same results.

In a separate scenario, while testing the Multiple Trouble Report function in M & R-1, testers were unable to cancel two submitted trouble tickets. As described in method one above, testers were unable to cancel the tickets by answering "yes" to the subsequent report flow question, "Is this cancel report/okay closeout?" or through the use of the F12

Sub Limited Override menu. Again, the tickets appeared to the user to be cancelled. However, when the TNs were re-entered for verification, the trouble tickets had not been cancelled. Testers were forced to call the Resale Service Center (RSC) in order to cancel these tickets.

BST Response

By design, TAFI will not allow a dispatched report to be closed (since a field technician is in control of the report). Per the documentation, the user can provide narrative info (i.e., trouble OK now) for the field technician to see.

The procedure for processing multiple trouble reports has been mechanized in TAFI. The updated *CLEC TAFI End-User Training and User Guide* will reflect the proper procedure for closing these reports. The guide will be available on the web February 1, 2000.



EXCEPTION 11

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M&R-1: TAFI Functional Test and M&R-8: TAFI Documentation Evaluation.

Exception:

The host request error and reset communications functions do not operate as described by the *CLEC TAFI End-User Training and User Guide*.

Host Request Errors: A host request error is the inability for TAFI to access one of the downstream systems in order to either gather information or send information during trouble report creation. According to the *CLEC TAFI End-User Training and User Guide*, when encountering a host request error, a user should queue the report until connections are re-established. Then, a user should "bring up the additional data window, highlight the transaction they want to execute and then depress F5 to reset/resend the transaction."

During testing, in two cases where host request errors occurred, when testers re-sent transactions by pressing the F5 key as instructed, a message was received stating that the host request type could not be reset. TAFI then returned to the trouble report screen as though no transaction had been executed. Once returned to the trouble report screen, testers were able to hit enter, and the reports were processed. Thus the F5 key failed to operate as stated in the manual.

Reset Communications: When TAFI is unable to access a downstream system, it generates a communications error message. According to the *CLEC TAFI End-User Training and User Guide*, when this happens a TAFI user can correct this problem by bringing up the additional data window using F11, selecting the 'Reset Communications' option, highlighting the link that reported the error, and pressing enter.

During the testing of one scenario, when selecting F11, testers noted that 'Reset Communications' was no longer listed as an option, as is described in the *CLEC TAFI End-User Training and User Guide*.

Impact

The inability to perform the host request error & reset communications functions, as stated in the manual, can require a CLEC to either: 1) phone in the trouble, or 2) attempt to process the ticket through trial and error. Both of these possibilities decrease CLEC personnel's productivity, and add cost to the CLEC operation. In addition, as a result of the additional calls to BellSouth, other CLEC customers may remain in the caller queue longer, thus decreasing customer satisfaction.



January 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M&R-1: TAFI Functional Test and M&R-8: TAFI Documentation Evaluation.

Exception:

The host request error and reset communications functions do not operate as described by the *CLEC TAFI End-User Training and User Guide*.

Host Request Errors: A host request error is the inability for TAFI to access one of the downstream systems in order to either gather information or send information during trouble report creation. According to the *CLEC TAFI End-User Training and User Guide*, when encountering a host request error, a user should queue the report until connections are re-established. Then, a user should "bring up the additional data window, highlight the transaction they want to execute and then depress F5 to reset/resend the transaction."

During testing, in two cases where host request errors occurred, when testers re-sent transactions by pressing the F5 key as instructed, a message was received stating that the host request type could not be reset. TAFI then returned to the trouble report screen as though no transaction had been executed. Once returned to the trouble report screen, testers were able to hit enter, and the reports were processed. Thus the F5 key failed to operate as stated in the manual.

Reset Communications: When TAFI is unable to access a downstream system, it generates a communications error message. According to the *CLEC TAFI End-User Training and User Guide*, when this happens a TAFI user can correct this problem by bringing up the additional data window using F11, selecting the 'Reset Communications' option, highlighting the link that reported the error, and pressing enter.

During the testing of one scenario, when selecting F11, testers noted that 'Reset Communications' was no longer listed as an option, as is described in the *CLEC TAFI End-User Training and User Guide*.

Impact

The inability to perform the host request error & reset communications functions, as stated in the manual, can require a CLEC to either: 1) phone in the trouble, or 2) attempt to process the ticket through trial and error. Both of these possibilities decrease CLEC personnel's productivity, and add cost to the CLEC operation. In addition, as a result of the additional calls to BellSouth, other CLEC customers may remain in the caller queue longer, thus decreasing customer satisfaction.

BST Response

The *CLEC TAFI End-User Training and User Guide* will be updated 2/1/00 to reflect the current operation of the system.

As information, TAFI now accesses legacy systems via Navigator contracts over BOSIP as opposed to terminal emulation over Datakit. Therefore the Reset Communications option is no longer applicable. The Host Request Error functionality does work for specific transactions and the updated documentation will be more specific.

EXCEPTION 12

BellSouth Georgia OSS Testing Evaluation

Date: January 5, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2).

Exception:

The ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.

Examples of inaccurate notification are described as follows:

1. The ECTA Gateway did not inform KPMG of an improper value transmitted for the troubleType object.

Within the ECTA Gateway, the troubleType object of a trouble report allows a CLEC to describe the trouble condition. The troubleType object is used by the ECTA Gateway to specify the type of automatic testing that a circuit will undergo, as well as to guide the BellSouth Maintenance Administrator in performing repairs. During the course of functional testing, KPMG intentionally submitted an incorrect non-numeric value for the troubleType object¹. The ECTA Gateway created a trouble ticket and sent back the normal successful trouble ticket response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance. KPMG examined the trouble ticket created, and discovered that the ECTA Gateway had assigned a value of NDT (No Dial Tone) to the troubleType object.

2. The ECTA Gateway did not inform KPMG of an improper value transmitted for the closeOutVerification object.

The ECTA Gateway generates a request for a CLEC to verify that a reported trouble has been corrected when either repairs to a WFA ticket have been completed, or when automated testing on an LMOS ticket indicates that no trouble is present. The closeOutVerification object allows a CLEC to respond to this request. Through this response, the CLEC indicates either that they concur that the trouble has been corrected and the report may be closed, or that the trouble has not been corrected and the report should remain open. During the course of functional testing, KPMG intentionally submitted an incorrect value for the closeOutVerification object². The

¹ Valid troubleType entries are numeric as defined in ANSI T1.227.

² The allowable values for this attribute are: 0 (NoAction), 1 (Verified), 2 (Denied), 3 (DeniedActivityDurationDisputed) or 4 (DeniedCloseOutNarrDisputed). KPMG submitted a value of 9.



EXCEPTION 12

BellSouth Georgia OSS Testing Evaluation

response for this transaction did not indicate that testers had submitted an invalid entry. KPMG examined the trouble ticket and found that the ECTA Gateway had assigned a value of "2" (Denied) to the closeOutVerification object.

Impact

Failure of the ECTA Gateway to indicate to a CLEC that invalid values have been entered into trouble tickets results in improper information appearing on trouble tickets. Uncorrected errors on invalid trouble report entries could result in trouble tickets being improperly handled.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions and higher operating costs resulting from allocation of CLEC personnel to re-submit trouble tickets.
- Reductions in customer satisfaction due to an inability to quickly and accurately correct operational trouble.



January 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2).

Exception:

The ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.

Examples of inaccurate notification are described as follows:

- 1. The ECTA Gateway did not inform KPMG of an improper value transmitted for the troubleType object.**

Within the ECTA Gateway, the troubleType object of a trouble report allows a CLEC to describe the trouble condition. The troubleType object is used by the ECTA Gateway to specify the type of automatic testing that a circuit will undergo, as well as to guide the BellSouth Maintenance Administrator in performing repairs. During the course of functional testing, KPMG intentionally submitted an incorrect non-numeric value for the troubleType object¹. The ECTA Gateway created a trouble ticket and sent back the normal successful trouble ticket response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance. KPMG examined the trouble ticket created, and discovered that the ECTA Gateway had assigned a value of NDT (No Dial Tone) to the troubleType object.

- 2. The ECTA Gateway did not inform KPMG of an improper value transmitted for the closeOutVerification object.**

The ECTA Gateway generates a request for a CLEC to verify that a reported trouble has been corrected when either repairs to a WFA ticket have been completed, or when automated testing on an LMOS ticket indicates that no trouble is present. The closeOutVerification object allows a CLEC to respond to this request. Through this response, the CLEC indicates either that they concur that the trouble has been corrected and the report may be closed, or that the trouble has not been corrected and the report should remain open. During the course of functional testing, KPMG

¹ Valid troubleType entries are numeric as defined in ANSI T1.227.

intentionally submitted an incorrect value for the closeOutVerification object². The response for this transaction did not indicate that testers had submitted an invalid entry. KPMG examined the trouble ticket and found that the ECTA Gateway had assigned a value of "2" (Denied) to the closeOutVerification object.

Impact

Failure of the ECTA Gateway to indicate to a CLEC that invalid values have been entered into trouble tickets results in improper information appearing on trouble tickets. Uncorrected errors on invalid trouble report entries could result in trouble tickets being improperly handled.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions and higher operating costs resulting from allocation of CLEC personnel to re-submit trouble tickets.
- Reductions in customer satisfaction due to an inability to quickly and accurately correct operational trouble.

Response:

- (1) The ECTA gateway assumes that the manager submits valid troubleType objects and it does not perform validation edits. In a traditional Manager/Agent gateway relationship, both parties adhere to the ANSI T1.227 standards, therefore, value validation is not required. During testing, the BellSouth gateway was accessed from a non-Manager interface which did not have the same safeguards in place.

² The allowable values for this attribute are: 0 (NoAction), 1 (Verified), 2 (Denied), 3 (DeniedActivityDurationDisputed) or 4 (DeniedCloseOutNarrDisputed). KPMG submitted a value of 9.



EXCEPTION 13

BellSouth Georgia OSS Testing Evaluation

Date: January 10, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

Exception:

Numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.

During functional testing, KPMG encountered spurious, BellSouth-specific messages generated by the TAFI application. None of the messages received was related to the data entered. Examples of the messages include:

1. A CPNI warning message stating, "CPNI data unavailable do not use this customer as a sales opportunity."
2. A message stating, "System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes."
3. A message instructing the TAFI user to, "Take trouble in GA WFA/C¹".
4. A message instructing the TAFI user to get their customer's email address and provide BellSouth's small business web site address.
5. A message stating, "Pending Backtalk."²

Impact

Ways in which CLECs are impacted by these undocumented, BellSouth-specific messages include:

- Messages such as 1, 2 and 3 above will create confusion for a CLEC. CLEC TAFI Users will be unsure as to the proper course of action. A CLEC will likely attempt to ascertain the source for and cause of these messages. Such action will result in slower response intervals, decreased customer satisfaction, and possible changes in workforce management.
- Messages such as 4 and 5 instruct CLECs to take an action or await action which involve a customer becoming aware of BellSouth's involvement in the CLEC

¹ GA WFA/C refers to the Georgia WFA Center which controls a BellSouth backend system intended to handle designed circuits. This message was received for a trouble ticket relating to POTS lines.

² Backtalk refers to a BellSouth service which calls customers with a recorded message to update the status of a trouble ticket. During playback, the recorded message makes explicit reference to BellSouth.



EXCEPTION 13

BellSouth Georgia OSS Testing Evaluation

maintenance and repair process. For example, message 4 instructs the TAFI user to direct the customer to BellSouth's small business web site address. Message 5 involves an automated BellSouth system which calls the customer when the trouble has been corrected. Following either of these actions will result in a CLEC inadvertently directing or exposing their customers to contact with their competitor. This could ultimately result in customer confusion and decreased customer satisfaction with the CLEC.



January 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

Exception:

Numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.

During functional testing, KPMG encountered spurious, BellSouth-specific messages generated by the TAFI application. None of the messages received was related to the data entered. Examples of the messages include:

1. A CPNI warning message stating, "CPNI data unavailable do not use this customer as a sales opportunity."
2. A message stating, "System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes."
3. A message instructing the TAFI user to, "Take trouble in GA WFA/C¹".
4. A message instructing the TAFI user to get their customer's email address and provide BellSouth's small business web site address.
5. A message stating, "Pending Backtalk."²

Impact

Ways in which CLECs are impacted by these undocumented, BellSouth-specific messages include:

- Messages such as 1, 2 and 3 above will create confusion for a CLEC. CLEC TAFI Users will be unsure as to the proper course of action. A CLEC will likely attempt to ascertain the source for and cause of these messages. Such action will result in slower response intervals, decreased customer satisfaction, and possible changes in workforce management.
- Messages such as 4 and 5 instruct CLECs to take an action or await action which involve a customer becoming aware of BellSouth's involvement in the CLEC

¹ GA WFA/C refers to the Georgia WFA Center which controls a BellSouth backend system intended to handle designed circuits. This message was received for a trouble ticket relating to POTS lines.

² Backtalk refers to a BellSouth service which calls customers with a recorded message to update the status of a trouble ticket. During playback, the recorded message makes explicit reference to BellSouth.

maintenance and repair process. For example, message 4 instructs the TAFI user to direct the customer to BellSouth's small business web site address. Message 5 involves an automated BellSouth system which calls the customer when the trouble has been corrected. Following either of these actions will result in a CLEC inadvertently directing or exposing their customers to contact with their competitor. This could ultimately result in customer confusion and decreased customer satisfaction with the CLEC.

BST Response

The proper handling of CPNI data is a FCC requirement. Since BST cannot control how the CLEC's user uses this data, TAFI provides a warning message every time the user accesses a customer's record.

The other BellSouth specific messages indicated above will be removed with the next schedule release, 3/31/00. The 'Pending BackTalk' message should never be displayed since CLEC reports are not routed to the BackTalk system. Investigation is in progress and corrective action will be taken when the root cause has been pinpointed.



EXCEPTION 14

BellSouth Georgia OSS Testing Evaluation

Date: January 10, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

Exception:

The BellSouth TAFI applications does not allow CLECs to process trouble reports for ISDN lines as described in the *CLEC TAFI End User Training and User Guide*.

During functional testing, KPMG was unable to execute four of the fifteen planned scenarios designed for processing trouble on ISDN lines. The *CLEC TAFI End User Training and User Guide* states that "trouble reports for TN based...services such as integrated services digital network (ISDN) voice...can be entered through the TAFI application." During CLEC TAFI training, BellSouth explained that entry of ISDN-related trouble must be done in override capacity rather than through the typical flow¹. However, when testers attempted to enter TNs for ISDN lines, the TAFI system rejected the TNs before override capacity could be initiated.

Impact

The inability of a CLEC to enter a trouble ticket for an ISDN line into TAFI will result in the need for a CLEC to call the appropriate BellSouth service center in order to report the trouble. This decreased functionality will result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.

¹ During typical flow, when the TN is entered, TAFI guides the user through a series of questions designed to identify the trouble involved. In override capacity, the user presses the F12 key and writes a brief description of the trouble.



January 19, 2000

EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

Exception:

The BellSouth TAFI applications does not allow CLECs to process trouble reports for ISDN lines as described in the *CLEC TAFI End User Training and User Guide*.

During functional testing, KPMG was unable to execute four of the fifteen planned scenarios designed for processing trouble on ISDN lines. The *CLEC TAFI End User Training and User Guide* states that "trouble reports for TN based...services such as integrated services digital network (ISDN) voice...can be entered through the TAFI application." During CLEC TAFI training, BellSouth explained that entry of ISDN-related trouble must be done in override capacity rather than through the typical flow¹. However, when testers attempted to enter TNs for ISDN lines, the TAFI system rejected the TNs before override capacity could be initiated.

Impact

The inability of a CLEC to enter a trouble ticket for an ISDN line into TAFI will result in the need for a CLEC to call the appropriate BellSouth service center in order to report the trouble. This decreased functionality will result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.

BST Response

The *CLEC TAFI End-User Training and User Guide* will be updated 2/1/00 to reflect the current operation of the system.

¹ During typical flow, when the TN is entered, TAFI guides the user through a series of questions designed to identify the trouble involved. In override capacity, the user presses the F12 key and writes a brief description of the trouble.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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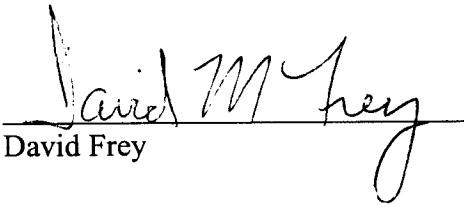
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— — — — —
— This 10th day of February 2000.

— — — — —

David Frey

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Suite 2000
Atlanta, GA 30308

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February 14, 2000

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

RECEIVED

FEB 14 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

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

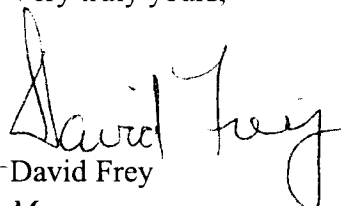
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Amended Exception 9 with BellSouth's amended response for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record





EXCEPTION 9 (Amended)
BellSouth Georgia OSS Testing Evaluation

RECEIVED

FEB 14 2000

Date: January 20, 2000

EXECUTIVE SECRETARY
G.P.S.C.

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG did not receive an electronically-delivered FOC or CN¹ for service orders that BellSouth has generated and completed. The following table provides specific data on these instances. The 5th column (BLS FOC Date) lists the date and time the service order entered SOCS.

PON	CC	Date/Time LSR Submitted	Date FA Revd	BLS Service Order Entry Date	KPMG Comments
627A214PEJ100001	9991	12/8/99 12:32pm	12/8/99 12:40pm	12/08/99 1:50pm	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
443A224PEM000002	9991	12/13/99 4:51pm	12/13/99 4:55pm	12/17/99 8:00am	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
454A126PTF100003	9991	12/22/99 1:26pm	12/22/99 1:26pm	12/22/99 3:02pm	No FOC or CN received as of 1/20/00.
204A211PTN100003	9994	12/29/99 1:15pm	12/29/99 1:15pm	1/3/00 10:39am	FOC was received 1/3/00 12:47pm on version 00. Supplemental LSR

¹ CNs are only expected on orders for which FOCs are received.



EXCEPTION 9 (Amended)
BellSouth Georgia OSS Testing Evaluation

PON	CC	Date/Time LSR Submitted	Date FA Revd	BLS Service Order Entry Date	KPMG Comments
					(version 01) was submitted and acknowledged on 1/10/00. No FOC or CN has been delivered as of 1/20/00.
440A124PEM100003	9991	1/12/00 9:02am	1/12/00 10:01am	1/12/00 12:52pm	No FOC or CN received as of 1/20/00.
454A126PEF000004	9991	1/12/00 2:02pm	1/12/00 2:17pm	1/18/00 5:20pm	KPMG received 2 Clarifications (CLRs) on 1/12 and 1/18. No FOC or CN received as of 1/20/00.

Notes:

1. PON = Purchase Order Number
2. CC = Company Code
3. LSR = Local Service Request
4. FA = Functional Acknowledgement, an electronic notification to CLECs that BellSouth has received the LSR file.

Impact

The absence of electronic delivery of FOC or CN responses to valid service requests submitted via an electronic interface will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** Without an electronic FOC response, a CLEC cannot confirm, in a timely manner, that BellSouth has received a valid service request and that an internal BellSouth service order has been generated. A CLEC is unable to confirm a requested service delivery date and cannot communicate the date of expected service installation to its end user customer. The inability for a CLEC to commit to an expected service date will negatively affect a customer's perception of the CLEC's service capabilities.
- **Increase in operating costs.** If no electronic FOC or CN is received, CLEC personnel will be forced to pursue the status of these service orders. This will require additional time, effort and cost by the CLEC.



February 10, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG did not receive an electronically-delivered FOC or CN¹ for service orders that BellSouth has generated and completed. The following table provides specific data on these instances. The 5th column (BLS FOC Date) lists the date and time the service order entered SOCS.

PON	CC	Date/Time LSR Submitted	Date FA Rev'd	BLS Service Order Entry Date	KPMG Comments
627A214PEJ100001	9991	12/8/99 12:32pm	12/8/99 12:40pm	12/08/99 1:50pm	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
443A224PEM000002	9991	12/13/99 4:51pm	12/13/99 4:55pm	12/17/99 8:00am	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
454A126PTF100003	9991	12/22/99 1:26pm	12/22/99 1:26pm	12/22/99 3:02pm	No FOC or CN received as of 1/20/00.
204A211PTN100003	9994	12/29/99 1:15pm	12/29/99 1:15pm	1/3/00 10:39am	FOC was received 1/3/00 12:47pm on version 00.

¹ CNs are only expected on orders for which FOCs are received.

PON	CC	Date/Time LSR Submitted	Date FA Rev'd	BLS Service Order Entry Date	KPMG Comments
					Supplemental LSR (version 01) was submitted and acknowledged on 1/10/00. No FOC or CN has been delivered as of 1/20/00.
440A124PEM100003	9991	1/12/00 9:02am	1/12/00 10:01am	1/12/00 12:52pm	No FOC or CN received as of 1/20/00.
454A126PEF000004	9991	1/12/00 2:02pm	1/12/00 2:17pm	1/18/00 5:20pm	KPMG received 2 Clarifications (CLRs) on 1/12 and 1/18. No FOC or CN received as of 1/20/00.

Notes:

1. PON = Purchase Order Number
2. CC = Company Code
3. LSR = Local Service Request
4. FA = Functional Acknowledgement, an electronic notification to CLECs that BellSouth has received the LSR file.

Impact

The absence of electronic delivery of FOC or CN responses to valid service requests submitted via an electronic interface will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** Without an electronic FOC response, a CLEC cannot confirm, in a timely manner, that BellSouth has received a valid service request and that an internal BellSouth service order has been generated. A CLEC is unable to confirm a requested service delivery date and cannot communicate the date of expected service installation to its end user customer. The inability for a CLEC to commit to an expected service date will negatively affect a customer's perception of the CLEC's service capabilities.
- **Increase in operating costs.** If no electronic FOC or CN is received, CLEC personnel will be forced to pursue the status of these service orders. This will require additional time, effort and cost by the CLEC.

BellSouth Response

The Service Representatives did not follow current methods and procedures when issuing the service orders which require the following criteria on an error free service order for a Firm Order Confirmation and Completion Notice to be sent electronically:

AECN (UNE)
Sales Code begins with "YAXQ"
PON
MAN (UNE)
RESH (RESALE)
RMKR

The service orders submitted by the Service Representatives for the above PONS failed to meet all the criteria for an FOC or CN to be returned mechanically. However, if the orders had been processed correctly, electronic FOCs and CNs would have been sent. Service Representatives in the LCSC have been retrained on how to properly handle UNE requests that fall out for manual processing to comply with our policy to provide FOCs and CNs within specified timeframes.

One of the 6 PONS, 204A211PTN100003, should have been clarified for missing data. A software change is being implemented 2/14/00 which will reject LSRs if Reqtyp = M, Acttyp = V and LA is missing.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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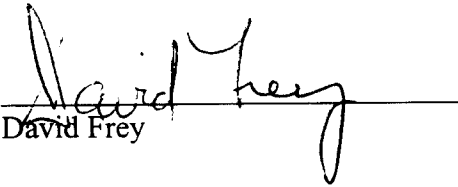
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— This 14th day of February 2000.


David Frey

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FEB 14 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

February 14, 2000

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

**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 twenty-six (26) copies, as well as an electronic copy, of BellSouth's amended response to Exception 12 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record





RECEIVED

FEB 14 2000

EXECUTIVE SECRETARY
G.P.S.C.

February 9, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2).

Exception:

The ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.

Examples of inaccurate notification are described as follows:

- 1. The ECTA Gateway did not inform KPMG of an improper value transmitted for the troubleType object.**

Within the ECTA Gateway, the troubleType object of a trouble report allows a CLEC to describe the trouble condition. The troubleType object is used by the ECTA Gateway to specify the type of automatic testing that a circuit will undergo, as well as to guide the BellSouth Maintenance Administrator in performing repairs. During the course of functional testing, KPMG intentionally submitted an incorrect non-numeric value for the troubleType object¹. The ECTA Gateway created a trouble ticket and sent back the normal successful trouble ticket response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance. KPMG examined the trouble ticket created, and discovered that the ECTA Gateway had assigned a value of NDT (No Dial Tone) to the troubleType object.

- 2. The ECTA Gateway did not inform KPMG of an improper value transmitted for the closeOutVerification object.**

The ECTA Gateway generates a request for a CLEC to verify that a reported trouble has been corrected when either repairs to a WFA ticket have been completed, or when automated testing on an LMOS ticket indicates that no trouble is present. The closeOutVerification object allows a CLEC to respond to this request. Through this response, the CLEC indicates either that they concur that the trouble has been corrected and the report may be closed, or that the trouble has not been corrected and the report should remain open. During the course of functional testing, KPMG

¹ Valid troubleType entries are numeric as defined in ANSI T1.227.

intentionally submitted an incorrect value for the closeOutVerification object². The response for this transaction did not indicate that testers had submitted an invalid entry. KPMG examined the trouble ticket and found that the ECTA Gateway had assigned a value of "2" (Denied) to the closeOutVerification object.

Impact

Failure of the ECTA Gateway to indicate to a CLEC that invalid values have been entered into trouble tickets results in improper information appearing on trouble tickets. Uncorrected errors on invalid trouble report entries could result in trouble tickets being improperly handled.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions and higher operating costs resulting from allocation of CLEC personnel to re-submit trouble tickets.
- Reductions in customer satisfaction due to an inability to quickly and accurately correct operational trouble.

BellSouth Response:

The ECTA gateway assumes that the manager submits valid troubleType and closeOutVerification objects and it does not perform validation edits. In a traditional Manager/Agent gateway relationship, both parties adhere to the ANSI T1.227 standards and therefore value validation is not required. During testing, the BellSouth gateway was accessed from a "non-Manager" interface that did not have the same safeguards in place. [Note: The errors observed in this exception report have never been observed in the production (Manager/Agent) environment.]

To improve the accuracy of communications between the Manager and Agent, the BellSouth ECTA interface will validate the troubleType and closeOutValidation objects. If the Manager sends an inappropriate value, ECTA will return an error message as opposed to processing the request with default values. We are evaluating the possibility of including these validation routines in the next ECTA production release scheduled for April 14. In the event we are unable to make this release, these validation routines will be deployed by 6/30/00.

² The allowable values for this attribute are: 0 (NoAction), 1 (Verified), 2 (Denied), 3 (DeniedActivityDurationDisputed) or 4 (DeniedCloseOutNarrDisputed). KPMG submitted a value of 9.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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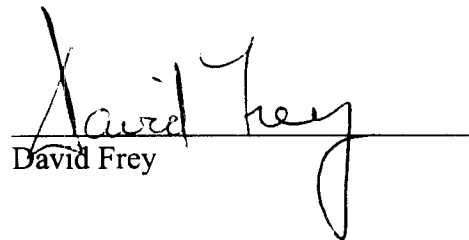
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This 14th day of February 2000.


David Frey

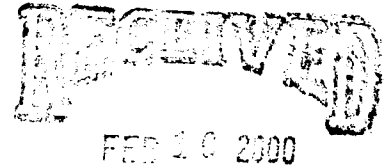
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February 15, 2000



BY HAND DELIVERY

Helen O'Leary
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GENERAL COUNSEL
GEORGIA

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 Georgia Third Party Test Developments" 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	)	Docket No.: 8354-U
Operational Support Systems	)	
	)	

AT&T'S COMMENTS ON GEORGIA THIRD PARTY TEST DEVELOPMENTS

I.

Comes Now AT&T Communications of the Southern States, Inc. (AT&T), and files its Comments on the revised Master Test Plan, Version 4.0 ("MTP") (and its revision); KPMG's Fifth and Sixth Interim Status Reports; KPMG's Third, Fourth, Fifth, Sixth, Seventh, Eighth, and Ninth Exception Reports, and BellSouth's Responses to the Exception Reports, and KPMG's Flow-Through Evaluation, Version 2.1; and shows this Commission as follows:

On December 16, 1999, KPMG filed a revised Master Test Plan, Version 4.0 with the Commission (Comments in Section II). On January 27, 2000, KPMG filed an unmarked revision of the Maintenance and Repair Section (Comments in Section II). On December 17, 1999, KPMG filed the fifth Interim Status Report (Comments in Section III). On January 28, 2000, KPMG filed the sixth Interim Status Report (Comments in Section III).

On January 7, 2000, the Commission posted KPMG's revised Flow-Through Evaluation, version 2.1, dated January 3, 2000 (Comments in Section XI).

On January 4, 2000, the Commission posted to its Web Site KPMG's third Exception Report (dealing with PMAP) and BellSouth's Response dated December 15, 1999, and December 22, 1999 respectively (Comments in Section IV).

On January 10, 2000, the Commission posted to its Web Site KPMG's fourth Exception Report (dealing with Order Functional Tests) and BellSouth's Response dated December 15, 1999, and December 21, 1999 respectively (Comments in Section V).

On January 13, 2000, the Commission posted to its Web Site KPMG's fifth Exception Report (dealing with TAG and EDI ordering documentation) and BellSouth's Response dated December 29, 1999, and January 7, 2000, respectively (Comments in Section VI).

On January 13, 2000, the Commission posted to its Web Site KPMG's sixth Exception Report (dealing with TAFI documentation) and BellSouth's Response dated December 29, 1999, and January 7, 2000, respectively (Comments in Section VII).

On February 2, , 2000, the Commission posted to its Web Site KPMG's seventh Exception Report (dealing with ECTA Functionality) and BellSouth's Response dated January 5, 2000, and January 19, 2000, respectively (Comments in Section VIII).

On February 2, 2000, the Commission posted to its Web Site KPMG's eighth Exception Report (dealing with FOCs and facility status) and BellSouth's Response dated January 12, 2000, and January 18, 2000, respectively (Comments in Section IX).

On February 8, 2000, the Commission posted to its Web Site KPMG's ninth Exception Report (dealing with missing FOCs and CNs) and BellSouth's Response dated January 20, 2000, and January 28, 2000, respectively (Comments in Section X)

II.

Comments on Revised Master Test Plan, Version 4.0 (including KPMG's Unmarked Revision of January 27, 2000)

KPMG's cover letter forwarding this revision to the Commission states that it "provides the Commission and other interested parties with "additional detail" and "does not constitute a change in direction with respect to the testing, nor is it in conflict with the July 2, 1999 Order." Upon reviewing the document, however, AT&T is concerned that indeed some changes conflict with the Commission's intent and should therefore be reviewed and approved by the Commission prior to their implementation. These changes include the scope of the billing tests, revisions to the maintenance and repair section and revisions to classification of test results.

II (A). Reduction in Scope of Billing Tests

One of KPMG's proposed revisions eliminates the requirement that tests associated with billing occur over two billing cycles. (MTP pages II-4, VI-5, VI-6). Another revision changes the billing test so that scenarios "similar to those" that would result from the provisioning of orders placed in the EDI and TAG ordering and provisioning tests are selected from the test bed rather than testing using the actual facilities and services provided by BellSouth as a result of the test orders. (MTP pages VI-5, VI-6).

These two changes significantly weaken the billing test's credibility and validity. They eliminate blindness, eliminate end-to-end testing, make it impossible to determine whether the process results are sustainable, and make it impossible to test any corrective measures that BellSouth might implement as a result of test failures. The impact of these two changes is that the test can no longer determine: 1) if BellSouth's billing accurately

reflects what CLEC's order, 2) if BellSouth's billing system accurately bills for items ordered or changed during one billing cycle but not billed until the next cycle, 3) if BellSouth dual bills its former customers when they migrate to a CLEC, and 4) if prorated billing for a partial billing cycle is accurate. By changing the billing test, CLECs and this Commission cannot be assured that CLECs and customers will receive accurate bills. This Commission *can* be assured it will be inundated with consumer complaints if a customer receives an astronomical bill for services he/she did not receive. Test plans in other states test billing over periods up to three cycles to ensure that the results prevent scenarios such as indicated above.

Further scenarios built within the billing test bed were created with BellSouth's assistance using the EDI-PC interface. Significantly the test includes no evaluation of either the EDI-PC interface or the process by which the billing test bed entries were created, even though it was necessary to obtain BellSouth's assistance when KPMG/HP was unable to pass orders to BellSouth using the interface (see MTP page III-4, and KPMG September Exception Report Ref # I-6 and I-8). Billing tests that use these test bed accounts and facilities will not reflect the billing and usage CLECs would receive with orders placed over EDI or TAG and actually provisioned by BellSouth in the normal course of business. Thus, the results do not provide the Commission with accurate data to assess what will occur with customer billing once there is normal to high volumes of activity in the telecommunications market.

II (B). Maintenance and Repair Revisions Deny the Commission Objective Information

In the Maintenance and Repair test, the revisions associated with the Exchange Carrier Trouble Analysis (ECTA) interface will not measure whether CLECs are provided

integrated machine-to-machine capabilities that BellSouth enjoys in its maintenance and repair processes. This change could lead to CLEC customers experiencing significant problems receiving timely repairs when their telephone is out of service. A failure to obtain timely telecommunication repairs leads to numerous consumer complaints to the Commission and/or the customer switching back to the ILEC. Neither is desirable and would not accelerate competition in the marketplace.

The revision eliminates testing of ECTA's ability to access Mechanized Loop Testing capabilities. (MTP page VII-5). (The unmarked revision submitted on January 27, 2000 appears to restore this test in Figure VII-III, but in so doing raises the question of KPMG's level of knowledge regarding the ECTA interface and its capabilities. This particular capability had been promised to AT&T in 1998 and to MCI in 1999, and therefore was properly within the scope of the test as initially written. Further, the implementation of this enhancement to ECTA by BellSouth should have been addressed in the Change Management process that is also being tested by KPMG.)

This revision also dilutes the focus of investigation into the ECTA interface in a number of ways. For example, documentation will not be examined for "availability" but rather "ease of use", not "completeness" but "conformance to ANSI standards", and KPMG will no longer identify an "exception" but instead will identify "issues with" documentation, and will no longer "assess" but only "comment on" findings. (MTP page VII-20). A number of test activities were eliminated in this revision including review of CLEC ECTA End User Training and User Guide, review of CLEC Training Guide M&R Sections, review of the ECTA help desk, and review of ECTA Carrier Notifications. (MTP page VII-21).

Each of these revisions deprives this Commission of objective information on the capabilities of the ECTA interface and the associated impact upon a CLEC's ability to compete. This is information the Commission has sought to assist it in resolving disputes, which have been before it for over three years, concerning these capabilities. Eliminating objective investigation clearly violates the Commission's intent in establishing the Third Party Testing.

II (C). Results Classification

Revision MTP. 4 also changes the way results of the test will be classified in the final report. Previously KPMG proposed four classifications: Satisfied; Satisfied With Qualifications; Not Satisfied; Satisfied, Exception Resolved. This revision now includes only Satisfied and Not Satisfied. (Appendix D1-6). The four level classification which has been used in a number of jurisdictions, was proposed for Georgia in Version 2 of the MTP by HP, and then clarified in Version 3 by KPMG. The classifications should not have been eliminated without explanation.

II (D). Clarification Needed.

Another change that reflects an improvement in the scope of testing simultaneously creates a need for clarification. In both the pre-ordering and ordering and provisioning test sections (IV and V) the Capacity Management tests have been expanded to include "other shared systems" (MTP page IV-1) and "LEO, LESOG, LNP, SOCS" (MTP page V-1) within the scope of the review. Including these "back office" and "middle ware" systems in the review of Capacity Management is a welcome improvement in test scope. However, clarification is needed to understand how KPMG includes the functionality of these systems in the other tests of these sections. Prior to this explicit expansion of

Capacity Management, the test plan created an assumption that the functionality these systems provided was being tested implicitly as a component of the full EDI or TAG interface existed. A functionality failure, say for example in the LNP Gateway would be captured, identified, and reported in the EDI and TAG test. KPMG now needs to assert positively that such functionality failures are being captured, identified, and reported.

III.

Comments on KPMG Interim Status Reports Dated December 17, 1999, and January 28, 2000.

In its fifth and sixth interim reports KPMG provides some information on the status of activities associated with the third party test effort. However, CLEC's would be better able to comment constructively upon the issues if KPMG provided additional detail. CLECs need to know each and every issue and/or problem KPMG encounters, no matter how minuet, because it is the CLECs, not KPMG, who must ultimately rely upon BellSouth's OSS to serve customers.

III.(A). Testing is not End-to-End.

KPMG states that Maintenance and Repair end-to-end testing began on December 6 and is expected to be completed by December 23, 1999 a date subsequently extended until February 7, 2000. A number of other M&R tests are also reported as being near completion, and yet the ordering and provisioning test bed has yet to be completed. The completion of Maintenance and Repair functional testing prior to the completion of provisioning tests demonstrates a deficiency of this test plan AT&T and others have commented on in the past. The test plan is not end-to-end but rather a set of individual unrelated tests that do not reflect the manner in which BellSouth provides service to

CLECs. Maintenance and repair problems in the real world are the result of operational activities associated with the establishment of service and the on-going operation of facilities in service. KPMG's statement that "KPMG began pre-order functional testing on December 14, 1999," also reflects the disjointed nature of the testing relative to the actual business processes.

III (B). The Blindness of the Test is Being Compromised.

KPMG reports that it "is continuing to submit a low volume of TAG and EDI functional transactions for all UNE product types. Submission of higher volumes is dependent upon BellSouth's completion of the test bed." The delay in completion of the ordering and provisioning test bed has been noted in each of KPMG's prior interim reports. At IR#5, Ref # I-2 KPMG reports that the test bed is 77% complete and that it expects BST to complete the test bed by 12/24/99; yet in the meantime "Order transaction testing is proceeding against test bed accounts that have been correctly provisioned." KPMG's procedure here significantly compromises the "blindness" of the testing, which is an essential component of a thorough third party test. Because only a portion of the test bed was correctly provisioned when functionality testing began, BellSouth knows the types of orders and scenarios under which KPMG can test. As time passes and KPMG's transactions are submitted and processed, BellSouth can determine which tests and scenarios have been executed and therefore can determine which ones remain. Functional EDI or TAG testing should not have started until the test bed was complete and accurate. The Commission should direct KPMG to re-initiate any testing completed prior to BellSouth's provisioning of a complete accurate test bed.

In IR#6, KPMG reports that all four test beds are 93% to 100% complete but reports two issues that raise concerns regarding the reporting of BellSouth documentation errors, the

accuracy of the test beds, and their uses. KPMG reports "A number of test bed specifications must be changed to reflect that ISDN-to-UNE and Centrex-to-UNE conversions are not electronically orderable," despite the fact that BellSouth's documentation specified that these services were electronically orderable. Although this same BellSouth documentation error is reported in the EDI and TAG Functional Testing Sections, it is not mentioned as a draft exception. Any CLEC that had relied upon the information provided to KPMG in developing and implementing its EDI and TAF interfaces to perform these functions would have expended considerable wasted resources.

KPMG also reports other test bed difficulties: "Among the 707 accounts requested by KPMG and provided by BLS, 383 are "live customer" accounts. Due to the normal change rate of customer accounts many of these "live" accounts no longer match the KPMG test bed requirements." KPMG is discussing the test to be used to support the RSIMMS volume tests. RSIMMS is an off-line replication of BellSouth's systems that will be used only for the volume tests. It is unclear how "live" accounts would be utilized in such testing, but it is abundantly clear that the test will not be blind, because BellSouth will have full knowledge of the pre-positioned data required to perform the test. When CLECs begin placing large volumes or orders, they will not notify BellSouth in advance to be "prepared" for specific types of orders. In a truly competitive environment, BellSouth will receive "blind" orders. Allowing BellSouth to avoid "blind" testing subjects CLECs and their customers to the real probability that BellSouth's will be unable to process large volumes of different types of orders in a timely manner.

III (C). Data Collection for Performance Measurement

KPMG reports that it has begun but not completed verifying the correspondence between the data fields it will collect and those used in BellSouth's PMAP (IR#5, page 2). KPMG states that it has relied upon unspecified and undocumented "interpretive assistance by BellSouth Subject Matter Experts (SMEs)" in reconciling the differences between BellSouth calculated SQM values and KPMG's attempts at replication. KPMG should not be proceeding with significant testing efforts that will produce performance data before it is even certain about the data it needs to collect during testing. Discovering at the end of testing that the wrong data, or data from the wrong sources was collected during the test would affect the credibility and validity of the whole effort. As with the completion of test beds, the Commission should direct that any testing conducted prior to the completion of these vital data validations be reinitiated.

III (D). EDI and TAG Functional Testing Issues

In IR#5, KPMG reports that it has uncovered four issues (partial migrations; supplements; inaccurate clarifications and coordinated hot cuts) associated with EDI and TAG functional testing for UNE orders. (Ref # I-6 and I-7). These issues, more than any others, directly impact how a CLEC can convert service for a customer in a timely manner and have been the subject of numerous CLEC inputs to the monthly Joint OSS Status Reports. However, CLECs are excluded from the proposed Next Step/Resolution. It does not appear that KPMG has prepared Draft Exceptions regarding all of these issues.¹

¹ Exceptions 4 and 5, which were posted to the Commission's Web Site, are discussed herein and address only the partial migration and supplements issues.

In IR#6, KPMG reports a number of additional issues associated with the functionality of the EDI and TAG interfaces. It appears that eight or more new issues have surfaced, but the interim report lacks sufficient detail upon which to provide comprehensive and meaningful comment. Recently established weekly CLEC/KPMG conference calls should be an opportunity to exchange more timely and detailed information with the CLEC community.

All re-testing of discrepancies found in the ECI and TAG functional tests should be fully regressive to correct for the compromised blindness of testing that was conducted before the test beds were fully completed. That is, after systems fixes and other required corrections are completed, all re-testing should begin at the initial step of the particular test, not simply from the point in testing at which the failure was identified. This is the only way to ensure that the system is functioning and fully operational for use by CLECs in serving their customers.

III (E). Some Reported Findings are Contradictory.

KPMG reports that the investigation of a TAG system processing limitation has been completed, but also states that they were in fact unable to complete the investigation because of HP's refusal to release information (IR#5, Ref # I-7). It is therefore not clear whether there is in fact a processing limitation and if so, what is the cause.

III(F). BellSouth is not Meeting KPMG's Information Needs in a Timely Manner.

BellSouth may not be providing KPMG with all of the information it needs in a timely manner. The Commission should note that if KPMG cannot receive information when requested, CLECs have even less of an ability to do so. This has a direct negative impact

on system changes, documentation and reports CLECs need to use BellSouth's OSS to serve customers in a timely manner. KPMG first requested BellSouth provide it with expedited raw data and reports sometime before September 10, 1999 . BellSouth has not yet provided KPMG with either the information or a date when the information will be provided. (Ref # II-1). Similarly, BellSouth has not provided KPMG with raw data and algorithmic instructions first requested sometime before October 25, 1999. The data being requested relates to performance that occurred in August 1999, and was officially reported to this Commission in September. KPMG has had to resort to establishing a weekly call to address outstanding requests for interviews and data. (Ref # II-1)

KPMG's comments regarding Capacity Management and Billing provide further indications that BellSouth has not provided KPMG with requested information on a timely basis:

KPMG's initial request for capacity management system and process documentation and interviewee lists was submitted to BST on 10/19/99. Follow-up requests were made on 12/7/99 and 12/14/99.

BST has not yet provided billing system technical documentation.

BLS has not yet provided CPU Utilization and Trending Graph/Reports, EDI Monthly Volume Reports, Monitoring Procedures Documentation, and Billing application documentation. (Ref # III-3)

In IR#5, Ref # II-4 KPMG reports that the RSIMMS test environment still lacks the full functionality of the production systems used by CLECs in day to day business. BellSouth has rescheduled a portion of the work required to upgrade RSIMMS from early Decemberto 12/31/99 -- a 3 or 4 week delay KPMG must determine that RSIMMS

mirrors the production environment sufficiently not to bias volume testing performed in RSIMMS rather than in production.

III (G). Change Management.

KPMG's comments indicate that it has completed the work on Change Management pending an evaluation of changes to the process that BellSouth implements as a result of Exception No 2, issued on 11/23/99. (IR#5, Ref # II-5) BellSouth and the CLECs must jointly agree to changes to the Electronic Interface Change Control Process (EICCP). BellSouth, however, has not presented any proposals to the joint steering committee to modify the EICCP as is required by the process. BellSouth should not institute unilateral changes in response to KPMG's exception report that do not conform to EICCP. Further, none of the systems fixes that BellSouth applied to the EDI and TAG interfaces on January 17, 2000, were noticed to the CLEC community.

III (H). Flow-Through Evaluation

KPMG notes a number of general issues regarding the flow-through evaluation, such as the procedures and business rules for determining error causes and their reconciliation with the programming logic to report flow-through. Additionally KPMG reports, apparently unaware of the problems CLECs have encountered on this issue, that a number of orders fall out for manual processing after reaching SOCS. (IR#5, Ref # III-1) Flow-through and its measurement is another critical area that has been in dispute between CLECs and BellSouth. CLECs have raised the issue that BellSouth has inflated the flow-through percentages by assigning BellSouth errors to CLECs. The numbers give the appearance of parity between BellSouth and CLECs when in fact CLEC orders are not processed in the same manner that BellSouth processes its own orders. The end

result is that the CLEC customer is left frustrated when their telephone service is not connected or converted on the scheduled date. This Commission should not sanction a process which inevitably leads to customer complaints and dissatisfaction. CLECs have provided this Commission with significant amounts of analysis and complaints over the past three years through direct comment and via the Monthly Joint OSS Status Report. However, the CLECs were not consulted in the investigation of KPMG's findings until late January. Any business rules, report logic and procedures that BellSouth has provided KPMG regarding flow-through should be immediately provided to the CLECs. Additionally, the issues and findings indicated here meet the criteria for the preparation and distribution of an Exception Report.

III(I). The Exception Process

In IR#5, Ref # IV-5, KPMG lists two published exceptions and four drafts. One of the four was withdrawn by KPMG based upon BellSouth's response. However, under the exception process utilized in this test CLECs do not have have access to the information provided to KPMG. Two of the four drafts were posted (as Exceptions # 3 and #4) to the GA PSC Web Site on January 4, 2000 and January 10, 2000, and will be discussed separately below. AT&T has commented previously on Exceptions #1 and #2 and notes that BellSouth has posted new pre-order business rules on its Web site in response to Exception #1. Regarding Exception #2, as discussed above, any unilateral action by BellSouth would be a violation of existing guidelines and BellSouth has not proposed changes to the EICCP Steering Committee.

The withdrawn draft cites KPMG's unsuccessful attempts to place/bill calls to a telephone number other than the originating or terminating telephone number. KPMG reports that BellSouth's initial response described the creation of errors in the Line

Identification Data Base that result “when a number of changes to a particular telephone line occur in a relatively short period of time.” BellSouth is reported as indicating that such errors occur for both BST retail and CLEC customers. The interaction between service orders, the Line Information Data Base (which AT&T believes is being referenced in KPMG’s report), call processing and billing is multifaceted. Without access to the specific information related to the four instances cited in KPMG’s report CLECs are unable to determine if KPMG’s withdrawal of this draft is warranted. There may be other CLECs who have experienced the same problem. However, because the draft exception was withdrawn based solely upon BellSouth’s response, this Commission and KPMG will be unable to determine if the problem is systemic or isolated.

The remaining draft exception concerns errors in recently released versions of the Local Exchange Ordering (LEO) Guide; errors in these guides can be fatal to the successful development and operation of CLEC interfaces. AT&T notes that BellSouth provided an initial response to KPMG’s December 9, 1999 draft on December 15, 1999.

Exception Reports #5 and #6 were posted to the Commission’s Web site on January 13, 2000, and will be discussed below. CLECs have no opportunity to review exceptions until after they are posted to the Commission’s Web site, and even then, CLECs have no access to the underlying information necessary to analyze the situations being reported. AT&T’s requests the Commission to remedy this process so CLECs may offer more complete and helpful comments to the Commission.

IR#6 lists approximately 15 or 16 potential exceptions. Exceptions 7, 8, and 9 have been recently published and are commented on below. AT&T hopes that the recently established weekly CLEC/KPMG conference calls can be used to exchange more timely

and detailed information with the CLEC community regarding issues and draft exceptions, thus improving the quality of information available to the Commission.

IV.

KPMG Exception Report #3 and BellSouth Response Posted to GA PSC Commission Web Site on January 4, 2000 PMAP Notifications

In this Exception, KPMG notes that CLECs are not notified when changes to historical performance measurement reports and/or the associated raw data reports are made after information has been removed from the Performance Measurement and Analysis Platform (PMAP) web site. Additionally, KPMG notes that even when changes occur during the time such reports and data are available on the web site, notifications are conditioned upon the CLEC having accessed the data previously. That is, only CLECs that previously accessed the data will receive notification that the information has changed. The Exception cites changes that impact CLECs to five reports during the month of August 1999, and reports that "BellSouth attributed changes in the reported values in these instances either to errors in reporting or to changes in the raw data." BellSouth's response describes the current month notification process and a plan to provide a notification process for changes to data from prior months by January 15, 2000.

The focus on the issue of notification in this Exception obscures the larger issue; BellSouth has continuously had "errors in reporting or changes in the raw data" either in the reports and data posted to the web site for the previous month, or for historical reports and data. In a footnote to this Exception, KPMG states that "BellSouth assured KPMG that the FCC is notified accordingly of all report and raw data changes, irrespective of the month in which these changes occurred." However, this answer does not address the underlying problem, which is errors in the production of reports and the collection, and

filtering of the raw data. Official reports filed by BellSouth with this Commission and others throughout 1999 have often contained revisions to prior month's filings. For example, the filing providing the November 1999 SQM data (filed on February 2, 2000) also included the following revisions to prior reports:

- Maintenance and Repair Reports for the month of September were revised to include tickets that had fallen out and had not been counted in the total trouble rate
- Percent Missed Installation Appointments Reports for trunking and provisioning for the months of July, August, and September were revised to exclude end User Misses that were originally included.
- The Customer Trouble Report Rate Report for the month of October was revised to include the UNE Non-Design data that was previously unavailable.

While BellSouth may have in reported errors in it prior reports and changes in its raw data, the process that produces such errors is unreliable and continues to produce inaccurate service quality information.

AT&T and BellSouth have been engaged in discussions concerning such report errors and raw data issues since the initial posting of CLEC Raw Data Records to BellSouth's Web site in June 1998. The discussion continued through the implementation of PMAP in March 1999 to the present. Attachment A to these comments is the Issues Register concerning this subject maintained by AT&T. This register documents all issues that AT&T has discovered and communicated to BellSouth both for the original web site and the existing PMAP site. Closed issues appear at the end of the register. As shown by the register, errors relating to reports and raw data are a continuing source of concern.

When considering the potential closure of this Exception, the Commission should ensure that the underlying issues concerning the existence of reports with errors and unreliable

raw data have been addressed. Closure should not occur until BellSouth has demonstrated that the underlying performance measurement processes are stable and accurate.

V.

**KPMG Exception Report #4 and BellSouth Response Posted to GA PSC
Commission Web Site on January 10, 2000
Partial Migrations**

The "*ENCORE USER REQUIREMENTS TO IMPLEMENT AN, ATN, EAN, EATN DATA FIELDS*" was published in November 1998. Since that time, the use of these fields to perform electronic partial migrations has been implemented in both the TAG and EDI interfaces and documentation on their use is provided in Volume 1 of the Local Exchange Ordering (LEO) Guide. KPMG's Exception discusses discrepancies between the LEO documentation, operational results, and error codes used to report order rejections. BellSouth's response -- that KPMG should upgrade its TAG interface to an OSS99 version, TAG 2.2.0.5, to avoid BellSouth's programming error in TAG 2.2.0.4 -- may clear the problem, but violates two test conditions established by this Commission. The first condition is that the test be conducted using pre-OSS99 interfaces, and the second is that a stable OSS environment be maintained. BellSouth is obligated to provide the partial migration functionality in the specified test interfaces (in this case TAG 2.2.0.4) and should demonstrate that it can do so by correcting its coding problem in that interface. CLECs that currently use EDI to perform partial migrations have developed "work-arounds" involving manual ordering. The EDI coding change, scheduled for implementation on January 17, 2000, will affect those CLECs, and should be noticed to the CLEC community in a timely manner. To date, CLECs have not been informed that this missing electronic capability is now available. When considering whether to close this Exception, the Commission should also investigate whether BellSouth is actually

providing the full range of migrations that can be accomplished through the use of these fields. BellSouth's business rules currently restrict the use of these fields in a number of ways.

VI.
KPMG Exception Report #5 and BellSouth Response Posted to GA PSC
Commission Web Site on January 13, 2000
Supplements

In this Exception, KPMG identifies problems with two LSR fields. According to BellSouth documentation, if a field is submitted with an error, the error can be corrected by issuing a supplement to the original request. by issuing With these two fields, however, a supplement cannot correct the error. BellSouth's existing documentation does not reflect this restriction, although it correctly reflects restrictions associated with two other LSR fields. BellSouth responded that it will update its documentation to define all fields that cannot be changed via a supplement. This will correct the documentation discrepancy, but does not fix the problem of the additional workload placed on CLECs due to the inability to correct errors using supplemental orders. The OBF LSR Guidelines do not restrict the use of supplements as BellSouth does through its business rules.

VII.
KPMG Exception Report #6 and BellSouth Response Posted to GA PSC
Commission Web Site on January 13, 2000
TAFI

AT&T's business units periodically evaluate the benefits of using each interface offered by BellSouth. Because AT&T is not currently using the TAFI interface, AT&T's

evaluation of its benefits would be based upon an evaluation of its associated documentation. Broad scale discrepancies such as those identified in this Exception could lead AT&T and other CLECs to inaccurately evaluate its utility.

VIII.

KPMG Exception Report #7 and BellSouth Response Posted to GA PSC Commission Web Site on January [xx], 2000 ECTA Functionality

BellSouth replies that it implemented a system fix to correct the handling of SL1 trouble reports over the ECTA interface. However, there has not been any notification to the CLECs that this interface production defect has been corrected so that any interim telephonic reporting processes can be terminated.

IX.

KPMG Exception Report #8 and BellSouth Response Posted to GA PSC Commission Web Site on February 2, 2000 Firm Order Confirmations and Facility Status

AT&T has long been aware that BellSouth does not perform a facilities check prior to issuing a FOC. This is a key reason why BellSouth's FOCs for electronic orders should always occur without delay, since the only requirement for issuing an FOC is that the order be found error free by BellSouth's systems. BellSouth's reply does not address the key issues in KPMG's exception. Jeopardy notices issued as a result of PF status should be timely (the example in the Exception was three days after the FOC) and provide an estimated service date. When BellSouth's retail service representatives attempt to contact their customers they have this information in hand. When BellSouth fails to provide this information to the CLECs it is impossible for the CLEC to contact its customer with the new service date. Hence, the CLEC customer is not being treated in the same manner as a BellSouth customer.

X.
KPMG Exception Report #9 and BellSouth Response Posted to GA PSC
Commission Web Site on February 28, 2000
Failure to Deliver FOCs and CNs

In this exception KPMG lists a number of orders upon which BellSouth failed to provide either an electronic Firm Order Confirmation (FOC) or Completion Notice (CN). In its reply, BellSouth lists a number of information items that must exist on an order in its Service Order Control System (SOCS) in order for electronic FOCs and CNs to be generated. BellSouth further reports that it is providing training to its personnel on how to properly handle these orders when they fall out to manual processing from SOCS.

When a CLEC submits an error-free order, BellSouth's systems are responsible for ensuring that the proper information is provided to SOCS to prevent fallout for manual handling. BellSouth's reply ignores this fact. BellSouth must identify and implement system fixes to eliminate these failures, not just provide an interim work around. Further, BellSouth must demonstrate that its flow-through reporting process properly reflects that such orders did not flow through the ordering system due to BellSouth failures when CLEC error-free orders do not receive FOCs or CNs.

XI.
KPMG's Revised Flow-Through Evaluation, Version 2.1, January 3, 2000

The only substantive change to this document appears on the last page and states that CLEC personnel will be interviewed to gain an understanding of their experience with BellSouth's flow through reporting and to provide documentation of attempts to reconcile

actual flow through with BellSouth's reports. AT&T welcomes the opportunity to discuss flow-through issues with KPMG. AT&T would like to point out, however, that BellSouth does not provide individual CLECs with the data necessary to perform a flow-through reconciliation and that CLECs cannot determine when their orders fail to flow through because of BellSouth errors. In AT&T's Comments on KPMG's Revised Third Party Master Test Plan, filed with this Commission on November 5, 1999, AT&T described a number of concerns with the Flow-Through Evaluation at Tab 3, pages 9-10. AT&T hereby incorporates its prior comments herein. KPMG's revision does not address any of these concerns.

WHEREFORE, AT&T requests this Commission to revise the MTP to reflect AT&T's comments herein.

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LOCAL SERVICES & ACCESS MANAGEMENT - PERFORMANCE MANAGEMENT

SOUTHERN REGION

ISSUES REGISTER

BELLSOUTH'S PERFORMANCE MEASUREMENTS ANALYSIS PLATFORM

BellSouth was ordered, on May 6, 1998, by the Georgia Public Service Commission to provide Service Quality Measurement Reports and Raw Data Records to the CLECs. BellSouth began posting information on its web site in June, 1998. Since that time, AT&T has taken an active roll in analyzing and critiquing the web site. BellSouth implemented a high capacity storage system in March, 1999 to accommodate its reporting obligation. The new system is the 'Performance Measurement & Analysis Platform (PMAP).

This issues register documents all issues that AT&T has discovered and communicated to BellSouth regarding reports formatting and content, raw data formatting and content, change notices, and documentation on its web site.
The closed issues are at the end of this register.

Refer questions to:
Jim Hill (404) 810-4929
Jimmy Benenati (404) 810-5753

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
C0026	01/05/99	BST Performance Web Site - Downloading Files. Each file must be individually downloaded. BellSouth does not provide a zip file containing all of the "Performance Report" files or the "Raw Data" files.	<u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: BellSouth has requested this as a future enhancement. <u>July 21, 1999</u> - File Transfer Protocol (FTP) is forthcoming. BST expects it in the September, 1999 timeframe. <u>January 10, 2000</u> - Requesting status from BellSouth.
C0027	01/05/99	BST Performance Web Site - BellSouth Performance Results Not Provided. BellSouth is not providing its performance results for comparison to determine parity. i.e. "Firm Order Confirmation - Non Mechanized" - "Regional Reports" section. Results are provided for the CLEC Aggregate only and do not provide BST's results.	<u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: BellSouth currently does not have data that can be captured for Firm Order Confirmation - Non Mechanized. AT&T's Position: An analogous process exists for each sub-process within BellSouth. <u>July 21, 1999</u> - This issue is expected to be closed with a Louisiana Commission decision on Analogs/Benchmarks for UNEs. No updates will be provided until Analogs and Benchmarks are in place for all BellSouth measurements.
C0029	01/05/99	BST Performance Web Site - Limited Raw Data. Raw data is limited to ordering, provisioning, and maintenance. BellSouth does not provide raw data for Billing, Operator Services & Directory Assistance, E911, Trunking, or Collocation.	<u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: BellSouth is providing all data that is available for these reports. AT&T's Position: BellSouth is not providing all data that is available for these reports. The data collection team does not require sub units or contractors to provide the raw data to pass on to the CLECs. <u>July 21, 1999</u> - New Trunking reports are being implemented on August 15, 1999. Raw Data will be provided with the reports. <u>January 10, 2000</u> - Raw Data is not yet available; Requesting status from BellSouth.
C0040	02/10/99 Issue Cont.	Percent Troubles Within 30 Days of Provisioning Near 100%. BellSouth's reported performance results beginning October, 1998, depict that nearly 100% of TCG's UNE Designed orders experience a trouble within 30 days of the provisioning due date	<u>February 10, 1999</u> - AT&T/BST Performance Meeting. Reviewed BST's performance using its Web Based Performance Reports for AT&T & TCG. Requested Root Cause Analysis, Pareto Charts for most frequent failure types, Improvement Plan & Improvement Timeline. <u>February 26, 1999</u> - AT&T/BST Performance Meeting. BST is still conducting analysis. <u>March 30, 1999</u> - AT&T/BST Performance Results Meeting. BST claims that calculation for TCG is incorrect. BST presented corrected performance results calculated by the UNE Center. <u>April 14, 1999</u> - Letter to Theresa Harris - BST requesting action plan and

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
			timeline. The following issues remain: • actual volumes flowing through BellSouth's UNE Center are different than volumes reported on BellSouth's Performance Web Site which compromises accuracy and completeness of BellSouth's data • BellSouth's web based calculation for TCG Unbundled Network Element - Design 'Percent Troubles Within 30 Days of Provisioning' is different than that in BellSouth's SQM Plan • performance results for CLEC Aggregate and AT&T appear inconsistent with Gary's report of the calculation methodology error • integrity of all other BellSouth Service Quality Measurement calculations and data collection processes are in question • TCG's 'Unbundled Network Element - Design, Percent Troubles Within 30 Days of Provisioning' performance results calculated by the BellSouth UNE Center are deficient <u>April 21, 1999</u> - Email from BST stating that account team changes are in progress and cannot immediately respond to 4/14/99 letter. <u>April 22, 1999</u> - Letter to BST expressing unacceptability of its 4/21/99 response. <u>May 28, 1999</u> - reiterated expectation for a written response to 4/14/99 letter. BST claimed response is forthcoming, pending completion of investigation. <u>June 9, 1999</u> - BellSouth response suggest that 'the UNE center tracks and analyzes performance at the individual circuit level whereas the SQM requirements are to track at the service order level. Since a service order might have more than one circuit, we would expect to see different volumes reported.' <u>June 15, 1999</u> - BST response again is inadequate and a sufficient explanation has not been provided why such as disparity in volumes exist between the UNE Center and the web site. <u>August 31, 1999</u> - Monthly Performance Results meeting: Asked for status on response to June 15, 1999 letter. Theresa Harris

Issue Cont.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
			stated that BST would not go back that far to investigate this issue. Stated that open issues still exist which BST has not yet addressed. <u>September 28, 1999</u> – Asked for status on response. BellSouth stated that response is forthcoming. <u>October 14, 1999</u> – BST offered no explanation as to why disparities exist between the UNE Center volumes and the Web Site Volumes, nor did BellSouth offer any plan to validate or certify its data collection and reporting processes. BellSouth's calculations and data source have been in question since February 1998. BellSouth has yet to provide a satisfactory answer to discrepancies that AT&T pointed out in correspondence since its discovery. It is hopeful that this issue will be resolved through the third party audit of BellSouth's PMAP measurement system, 1st quarter, 2000.
C0066	07/21/99 Issue Cont.	The OCI UNE and Non-UNE reports (CLEC and SQM) contain overlapping intervals. The intervals are 0-5, 5-10, 10-15, 15-20, 20-25, 25-30, >30. At the BellSouth Performance meeting on 21 July 1999, BellSouth responded that the intervals had always overlapped. Only the June and July reports contain overlapping intervals. The March through May OCI UNE reports do not contain overlapping intervals. The non-overlapping intervals used from March through May are 0-5, 6-10, 11-15, 16-20, 21-25, 26-30, >30. Since the problem was not properly addressed in July, the July reports now contain the same inconsistency. The reports are not meaningful if the data is inconsistent.	<u>July 21, 1999</u> - Met with BST - stated that the intervals had always overlapped. <u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated. <u>September 17, 1999</u> - Letter received from BellSouth. (Paraphrase) <i>It was necessary to change the intervals in July because the months' intervals were incorrect.</i> <u>September 28, 1999</u> - Met with BST. Brian explained that the headings should be interpreted in the following manner: 0-5 days = 0.0-4.99 days 5-10 days = 5.0 to 9.99 days 10-15 days = 10.0 to 14.99 days etc. Jim requested that an explanation be provided in PMAP documentation or in BellSouth's SQM. <u>October 28, 1999</u> - Met with BellSouth. Brian said that the change would be documented in the next SQM.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
C0067	08/3/99	Performance Measurement and Analysis Platform (PMAP), Raw Data User Manual, Version 1.2, July 15, 1999 This manual is ineffective at recreating monthly reports for the following reasons. Microsoft Excel's filtering ability was overstated on page 5. The instructions on page 5 state that Excel can be used to filter the data according to the directions in Section III. The directions in Section III instruct the user to filter the data based on up to twenty-six different criteria. Excel can only filter based on a maximum of two categories. Examples of this problem are on page 11, Step 3; page 12, Step 8; page 14, Step 3; page 16, Step 3; page 18, Step 3; page 19, Step 3; page 21, Step 3; and page 23, Step 3. Microsoft Excel's filtering ability was overstated on page 5. The instructions on page 5 state that Excel can be used to filter the data according to the directions in Section III. The instructions ask the user to exclude weekend dates on page 8, Step 2; page 9, Step 2; and page 10, Step 2, but Excel is unable to filter out weekend dates. Microsoft Excel's filtering ability was overstated on page 5. The instructions on page 5 state that Excel can be used to filter the data according to the directions in Section III. On page 11, Step 2 and page 14, Step 2, the instructions ask the user to exclude based on the difference of two fields (A-B < 0). Excel cannot filter based on this criterion. On page 6, Step 5 fatal rejects are listed in a separate raw data file that is combined with other raw data files to form the Percent Reject Service Requests - Fully Mechanized report. The fatal rejects are supposed to be removed from this report (effective date?). If it is so easy to separate the rejects and the fatal rejects in the raw data files why are they combined in the Percent Reject Service Requests - Fully Mechanized report? The <i>FOC Timeliness Trunks</i> reports cannot be consistently created because the reports are often unavailable on PMAP. In June the <i>FOC Timeliness Trunks</i> reports were not listed in the index of reports. Both the reports and the raw data files were accessible in May.	AT&T will close this issue when BellSouth's documentation is updated. <u>August 9, 1999</u> - Met with Brian Jones. He acknowledged problem. <u>September 13, 1999</u> - Letter received, acknowledged problem. New version to be released late fourth quarter 1999. <u>January 10, 2000</u> - Received BellSouth's Version 2, November 15, 1999. Next step - test documentation by recreating BellSouth reports using BellSouth's raw data. New Document under review.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	Neither contained any information however, so the PMAP Raw Data User Manual could not be used to recreate the reports. In April these reports were listed and contained information but, no raw data file was available The <i>Reject Interval – Non-Mechanized</i> cannot be recreated because the instructions do not take into account that the interval is in days and not hours. On Step 2 of page 8 and page 9 the user is instructed to exclude records in the <i>s_rq_stat_id</i> field. This field does not exist in the raw data files. The <i>S_RQ_STAT</i> field and the <i>S_RQ_STAT_TYPE_ID</i> field are the two fields that come closest to matching this field. On page 11, Step 2 and page 14, Step 2 and Step 5 the user is instructed to exclude records in the <i>cmpltn_date</i> field. This field does not exist in the raw data files. The <i>CMPLTN_DT</i> field is the only field that comes close to matching this field. On Step 3 of page 11 and page 14 the user is instructed to exclude records in the <i>so_type</i> field. This field does not exist in the raw data files. The <i>SO_TYPE_CD</i> field, the <i>SO_TYPE_ID</i> field, and the <i>SO_TYPE_DESC</i> are the three fields that come closest to matching this field. On Step 3 of page 11 and page 14 the user is instructed to exclude records in the <i>so_status_time</i> field. This field does not exist in the raw data files. The <i>SO_STATUS_TIMESTAMP</i> field is the only field that comes close to matching this field. On page 11, Step 3 the user is instructed to manipulate the field <i>cmitt_date</i>. This field is not listed in the glossary in the back of the user guide. The instructions for Percent Missed Installation Appointments do not contain any information on how to differentiate the raw data into the report containing less than ten circuits and the report containing ten or more circuits. Step 8 on page 12 instructs the user to filter the data where <i>cmitt_date</i> < <i>cmpltn_date</i>. Another part of Step 8 instructs the user to filter the data where <i>cmpltn_date</i> > <i>issu_date</i>. A majority of these date fields are equal to one another. Is it possible that the data should be filtered with < and > to include these dates? Step 9 on page 15 requires the user to divide the number in Step 9 by the number in Step 8. It is impossible to determine the value for Step 9 if a value is already needed for Step 9	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		to determine the value of Step 9 (A=A/B). On page 11, Step 2; page 14, Step 2; and page 16, Step 3, the user is instructed to exclude records that are null. It is unclear whether the record should be excluded if the field is blank or if the field contains a value of null. Step 9 on page 12, the instructions give no information about filtering according to <i>prod_desc</i>, which is necessary to recreate the report. On Step 8 of page 16 the user is asked to count the number of records that have a value in the <i>ticket_id</i> field. The <i>ticket_id</i> field does not exist for the Held Orders raw data file. On Step 2 of page 19 and page 21 the user is instructed to exclude records in the <i>report_type_id</i> field. This field does not exist in the raw data files. The <i>RPRT_TYPE_CD</i> field, the <i>RPRT_TYPE_ID</i> field, and the <i>RPRT_TYPE_DESC</i> are the three fields that come closest to matching the field in question. On Step 4 of page 22 a sentence reads: <i>To determine if the appointment was missed filter on the miss_appt_flag</i>. The sentence might be clearer if a comma is added after the word 'missed.' The following reports were unable to be fully recreated using the raw data due to the problems listed above: • FOC Timeliness – Non-Trunks • FOC Timeliness Trunks • Percent Missed Installation Appointments • Order Completion Interval (OCI) • Held Order Interval • Customer Trouble Report Rate • Out of Service > 24 Hours Issue Cont.	
C0068	08/23/99	BellSouth frequently makes changes to the reports in PMAP during the reporting period. No notification or explanation was given for the following file changes. Unannounced changes diminish the effectiveness of PMAP. BellSouth cannot guarantee the user updated data. The following files originally contained information at the beginning of the reporting period (15 July 1999), but did not at the end of the reporting period (13 August 1999). • OCI Non-UNE Design – Non-Dspch CLEC • OCI Non-UNE Design – Non-Dspch CLEC Reg • OCI POTS Dispatch CLEC	<u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>August 31, 1999</u> - Met with BellSouth. Discussed that BellSouth makes changes to the reports during the reporting period and fails to notify the user of these changes. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• OCI POTS Dispatch CLEC (Region) • OCI POTS Non-Dispatch CLEC • OCI POTS Non-Dispatch CLEC (Region) • OCI UNE Design - Dispatch CLEC • OCI UNE Design - Dispatch CLEC (Region) • OCI UNE Design - Non-Dispatch CLEC • OCI UNE Design - Non-Dispatch CLEC (Region) • OCI Non-UNE Design - Dispatch SQM • OCI Non-UNE Design - Dispatch SQM (Reg) • OCI Non-UNE Design - Non-Dspch SQM • OCI Non-UNE Design - Non-Dspch SQM (Reg) • OCI POTS Dispatch SQM • OCI POTS Dispatch SQM (Region) • OCI POTS Non-Dispatch SQM • OCI POTS Non-Dispatch SQM (Region) • OCI UNE Design - Dispatch SQM • OCI UNE Design - Dispatch SQM (Region) • OCI UNE Design - Non-Dispatch SQM • OCI UNE Design - Non-Dispatch SQM (Region) The following files were added to the PMAP site after the beginning of the June reporting period. CLEC 5. Trunk Group Performance • Trunk Group Service Detail CLEC, 5/99 • Trunk Group Service Detail CLEC, 6/99 • Trunk Group Service Report CLEC, 5/99 • Trunk Group Service Report CLEC, 6/99 SQM 8. Trunk Group Performance • Trunk Group Srvc Dtl SQM (CTTG), 5/99 • Trunk Group Srvc Dtl SQM (CTTG), 6/99 • Trunk Group Srvc Dtl SQM (Local), 5/99 • Trunk Group Srvc Dtl SQM (Local), 6/99 • Trunk Group Srvc Report SQM, 5/99 The following files were added to the Miscellaneous Aggregate Reports section on 16 July 1999. • heldord_msa_trks_ACG_06301999.txt	response will be generated. <u>September 17, 1999</u> - Letter received from BellSouth. (Paraphrase) <i>There is no record of a problem with the OCI report, BellSouth asks users to call help desk when a problem is encountered. The Trunk Group Performance reports for May and June were posted in July because BellSouth was informed that they were unavailable in May and June. The Miscellaneous reports that were added late were done so because they were on a different database than the PMAP database. Attempts are being made to move the reports to PMAP and to improve the delivery schedule until then. The Miscellaneous reports that were deleted were not deleted but moved to PMAP without notification after the beginning of the report period. BellSouth will try to notify users prior to making changes.</i> <u>September 28, 1999</u> - Met with BellSouth. Follow up discussion to 8/31 meeting and 8/23 letter. Files are added and deleted from PMAP on a daily basis. AT&T is not sure which day contains the official reports and requested a date for stabilization of the web. BellSouth said the web site typically stabilizes after a few days. The reports and the raw data on the web are validated in the initial days of the reporting period if discrepancies are detected, the files are removed from the web site, reconciled, and replaced. BellSouth will try to improve the process so data posted on the 15th of the month will be complete and accurate. AT&T would like BellSouth to share its timeline for improvement. <u>October, 1999</u> - CLEC Notification of Changes BST's 3 methods for notification of changes: • Notes Page on the Web Site that provides a list of changes that have been made • Pop Up Window on the Web Site that provides notification to the CLEC of a change to a file • E-mail notifying a specific CLEC that a previously downloaded file has been changed and a request to download the corrected file Brian suggested that Jimmy Benenati submit for a

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• heldord_msa_trks_BST_06301999.txt • istocomTR_MSA_ACG_LA_061999.txt • istocomTR_MSA_BST_LA_061999.txt • provtk_MSA_ACG_LA_061999.txt • provtk_MSA_BST_LA_061999.txt • acni_ACG_MSAR_061999.txt The following files were added to the ATTLOCAL Miscellaneous Reports section after the beginning of the June reporting period. AT&T LOCAL • 0288 Prov_Trouble_w_in_30_Days_RESALE_Design.html • 0288 Prov_Trouble_w_in_30_Days_UNE_Design.html • lnp_0288_061999.html • Resalerpt_0288_061999.html • UNELoop_0288_061999.html TELEPORT COMMUNICATIONS GROUP • 7125 Prov_Trouble_w_in_30_Days_RESALE_Design.html • 7125 Prov_Trouble_w_in_30_Days_UNE_Design.html • lnp_7125_061999.html • Resalerpt_7125_061999.html • UNELoop_7125_061999.html AT&T LOCAL • 7421 Prov_Trouble_w_in_30_Days_RESALE_Design.html • 7421 Prov_Trouble_w_in_30_Days_UNE_Design.html • ATTLOCAL_contract_BST_avg_ans_061999.xls • ATTLOCAL_contract_BST_retail_agg_061999.xls • ATTLOCAL_contract_BST_trunk_agg_061999.xls • ATTLOCAL_contract_CLEC_LNP_agg_061999.xls • ATTLOCAL_contract_CLEC_resale_agg_061999.xls • ATTLOCAL_contract_CLEC_trunk_agg_061999.xls • ATTLOCAL_contract_CLEC_UNE_loop_061999.xls • ICXTrunking_ATX_061999.html • lnp_7421_061999.html • Resalerpt_7421_061999.html • UNELoop_7421_061999.html TCG MIDSOUTH • 8271 Prov_Trouble_w_in_30_Days_RESALE_Design.html	PMP ID and Password so that he would obtain E-mail notifications. Brian also suggested that having a 'Change Notice' process would be beneficial because, BellSouth would post upcoming changes on the web site and CLECs could provide feedback regarding the changes. February 1, 2000 – No changes observed in November and December data. Hold open for observation of January, February, and March 2000 data.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	8271_Prov_Trouble_w_in_30_Days_UNE_Design.html - lnp_8271_061999.html - Resalerpt_8271_061999.html - UNELoop_8271_061999.html TELEPORT COMMUNICATIONS ATLANTA 8392_Prov_Trouble_w_in_30_Days_RESALE_Design.html 8392_Prov_Trouble_w_in_30_Days_UNE_Design.html - lnp_8392_061999.html - Resalerpt_8392_061999.html - UNELoop_8392_061999.html TCG AMERICA 7658_Prov_Trouble_w_in_30_Days_RESALE_Design.html 7658_Prov_Trouble_w_in_30_Days_UNE_Design.html - lnp_7658_061999.html - Resalerpt_7658_061999.html - TELPTCOM_contract_BST_avg_061999.xls - TELPTCOM_contract_BST_retail_agg_061999.xls - TELPTCOM_contract_BST_trunk_agg_061999.xls - TELPTCOM_contract_CLEC_LNP_agg_061999.xls - TELPTCOM_contract_CLEC_resale_agg_061999.xls - TELPTCOM_contract_CLEC_trunk_agg_061999.xls - TELPTCOM_contract_CLEC_UNE_loop_061999.xls - UNELoop_7658_061999.html AT&T COMMUNICATIONS - ATX_Trunk_Group_Performance.xls TCG (TELEPORT COMM. GROUP) - ICXTrunking_TPM_061999.html - TPM_Trunk_Group_Performance.xls The file <i>ACG_Trunk_Group_Performance.xls</i> was added to the Miscellaneous Aggregate Reports section after the beginning of the June reporting period. The following files were deleted from the Miscellaneous Aggregate Reports section before the end of the June reporting period. - PERCENT_PROVISIONING_ORDER_ACCURACY_061999.xls - Heldord_msa_trks_AGG_06301999.txt - Heldord_msa_trks_BST_06301999.txt	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• IstocomTR_MSA_AGG_LA_06301999.txt • IstocomTR_MSA_BST_LA_06301999.txt • Provtrk_MSA_AGG_LA_061999.txt • Provtrk_MSA_BST_LA_061999.txt • acni_AGG_MSAR_061999.txt A number of files were deleted from the miscellaneous reports section and replaced with reports on the PMAP website. Changes to the data should occur after they have been posted at the beginning of the reporting period. The following files were added to PMAP by 18 July 1999. • Avg Completion Notice Intvl CLEC • Avg Completion Notice Intvl CLEC (Reg) • Avg Completion Notice Interval CLEC MSA • Avg Completion Notice Intvl SQM • Avg Completion Notice Intvl CLEC (Reg) The following files were deleted from the Miscellaneous Aggregate Reports section by 18 July 1999. AT&T LOCAL • 0288 Avg Completion_Notice.txt TELEPORT COMMUNICATIONS GROUP • 7125 Avg_Completion_Notice.txt AT&T LOCAL • 7421 Avg Completion_Notice.txt TCG MIDSOUTH • 8271 Avg Completion_Notice.txt TELEPORT COMMUNICATIONS ATLANTA • 8392 Avg Completion_Notice.txt TCG AMERICA • 7658 Avg Completion_Notice.txt Miscellaneous Aggregate Reports • acni_ACG_071999.txt The following files were added to the PMAP site after the beginning of the July reporting period (between August 16 and August 18). • Avg Completion Notice Intvl CLEC • Avg Completion Notice Intvl CLEC (Reg) • Avg Completion Notice Intvl CLEC MSA	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
Issue Cont.		• Avg Completion Notice Intvl SQM • Avg Completion Notice Intvl SQM (Reg) • Avg Completion Notice Intvl MSA The following files were deleted from the PMAP site after the beginning of the August reporting period (between 0717 and 1421 on September 15). • % Missed Installation Appmts Trunks CLEC • % Missed Installation Appmts Trk CLEC MSA • % Missed Installation Appmts Trunks SQM • % Missed Installation Appmts Trk MSA • E911 Mean Intvl SQM (BST & CLEC Resale) • E911 Tmlns & Accrcy SQM(BST&CLEC Resale) The following files were deleted from the PMAP site after the beginning of the August reporting period (between 1421 and 1520 on September 15). • % Prov. Trouble w/i 30 Days CLEC • % Prov. Trouble w/i 30 Days CLEC (Reg) • % Prov. Trouble w/i 30 Days Trunks CLEC • % Prov. Trouble w/i 30 Days POTS CLEC • % Prov. Trouble w/i 30 Days POTS CLEC Reg • OCI Local Interconnect Trunks Total CLEC • OCI Local Interconnection Trunks CLEC • OCI Non-UNE Design – Dispatch CLEC • OCI Non-UNE Design – Dispatch CLEC (Reg) • OCI Non-UNE Design – Non-Dspch CLEC • OCI Non-UNE Design – Non-Dspch CLEC Reg • OCI POTS Dispatch CLEC • OCI POTS Dispatch CLEC (Region) • OCI POTS Non-Dispatch CLEC • OCI POTS Non-Dispatch CLEC (Region) • OCI UNE Dispatch CLEC • OCI UNE Dispatch CLEC (Region) • OCI UNE Non-Dispatch CLEC • OCI UNE Non-Dispatch CLEC (Region) • % Prov. Trouble w/i 30 Days CLEC MSA • % Prov. Trouble w/i 30 Days Trk CLEC MSA • OCI Local Interconnection Trk CLEC MSA	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• OCI Non-UNE Design – Dispatch CLEC MSA • OCI Non-UNE Design – Non-Dspch CLEC MSA • OCI POTS Dispatch CLEC MSA • OCI POTS Non-Dispatch CLEC MSA • OCI UNE Dispatch CLEC MSA • OCI UNE Non-Dispatch CLEC MSA • % Prov. Trouble w/i 30 Days POTS SQM • % Prov. Trouble w/i 30 Days POTS SQM Reg • % Prov. Trouble w/i 30 Days SQM • % Prov. Trouble w/i 30 Days SQM (Region) • % Prov. Trouble w/i 30 Days Trunk SQM • OCI Local Interconnection Trunks SQM • OCI Non-UNE Design – Dispatch SQM • OCI Non-UNE Design – Dispatch SQM (Reg) • OCI Non-UNE Design – Non-Dspch SQM • OCI Non-UNE Design – Non-Dspch SQM Reg • OCI POTS Dispatch SQM • OCI POTS Dispatch SQM (Region) • OCI POTS Non-Dispatch SQM • OCI POTS Non-Dispatch SQM (Region) • OCI UNE Dispatch SQM • OCI UNE Dispatch SQM (Region) • OCI UNE Non-Dispatch SQM • OCI UNE Non-Dispatch SQM (Region) • % Prov. Trouble w/i 30 Days MSA • % Prov. Trouble w/i 30 Days Trk MSA • OCI Local Interconnection Trks MSA • OCI Non-UNE Design – Dispatch MSA • OCI Non-UNE Design – Non-Dspch MSA • OCI POTS Dispatch MSA • OCI POTS Non-Dispatch MSA • OCI UNE Dispatch MSA • OCI UNE Non-Dispatch MSA • Cumulative Collocation MSA The following files were added from the PMAP site after the beginning of the August reporting period (between 1421 and 1520 on September 15).	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• % Missed Installation Appmts Trunks CLEC • % Missed Installation Appmts Trk CLEC MSA • % Missed Installation Appmts Trunks SQM • % Missed Installation Appmts Trk MSA The following files were added from the PMAP site after the beginning of the August reporting period (between 1520 on September 15 and 0756 on September 16). • % Prov. Trouble w/i 30 Days CLEC • % Prov. Trouble w/i 30 Days CLEC (Reg) • % Prov. Trouble w/i 30 Days Trunks CLEC • % Prov. Trouble w/i 30 Days POTS CLEC • % Prov. Trouble w/i 30 Days POTS CLEC Reg • OCI Local Interconnect Trunks Total CLEC • OCI Local Interconnection Trunks CLEC • OCI Non-UNE Design - Dispatch CLEC • OCI Non-UNE Design - Dispatch CLEC (Reg) • OCI Non-UNE Design - Non-Dspch CLEC • OCI Non-UNE Design - Non-Dspch CLEC Reg • OCI POTS Dispatch CLEC • OCI POTS Dispatch CLEC (Region) • OCI POTS Non-Dispatch CLEC • OCI POTS Non-Dispatch CLEC (Region) • OCI UNE Dispatch CLEC • OCI UNE Dispatch CLEC (Region) • OCI UNE Non-Dispatch CLEC • OCI UNE Non-Dispatch CLEC (Region) • % Prov. Trouble w/i 30 Days CLEC MSA • % Prov. Trouble w/i 30 Days Trk CLEC MSA • OCI Local Interconnection Trk CLEC MSA • OCI Non-UNE Design - Dispatch CLEC MSA • OCI Non-UNE Design - Non-Dspch CLEC MSA • OCI POTS Dispatch CLEC MSA • OCI POTS Non-Dispatch CLEC MSA • OCI UNE Dispatch CLEC MSA • OCI UNE Non-Dispatch CLEC MSA • % Prov. Trouble w/i 30 Days POTS SQM	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• % Prov. Trouble w/i 30 Days POTS SQM Reg • % Prov. Trouble w/i 30 Days SQM • % Prov. Trouble w/i 30 Days SQM (Region) • % Prov. Trouble w/i 30 Days Trunk SQM • OCI Local Interconnection Trunks SQM • OCI Non-UNE Design – Dispatch SQM • OCI Non-UNE Design – Dispatch SQM (Reg) • OCI Non-UNE Design – Non-Dspch SQM • OCI Non-UNE Design – Non-Dspch SQM Reg • OCI POTS Dispatch SQM • OCI POTS Dispatch SQM (Region) • OCI POTS Non-Dispatch SQM • OCI POTS Non-Dispatch SQM (Region) • OCI UNE Dispatch SQM • OCI UNE Dispatch SQM (Region) • OCI UNE Non-Dispatch SQM • OCI UNE Non-Dispatch SQM (Region) • % Prov. Trouble w/i 30 Days MSA • % Prov. Trouble w/i 30 Days Trk MSA • OCI Local Interconnection Trks MSA • OCI Non-UNE Design – Dispatch MSA • OCI Non-UNE Design – Non-Dspch MSA • OCI POTS Dispatch MSA • OCI POTS Non-Dispatch MSA • OCI UNE Dispatch MSA • OCI UNE Non-Dispatch MSA The following files were deleted from the PMAP site after the beginning of the August reporting period (between 0756 on September 16 and 0848 on September 17). CLEC 4. Billing • Invoice Accuracy CLEC (Region) • Mean Time to Deliver Invoices CLEC (Reg) • Usage Data Delivery Accuracy CLEC • Usage Timeliness & Completeness CLEC SQM 5. Billing • Invoice Accuracy SQM (Region) • Mean Time to Deliver Invoices SQM (Reg)	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
Issue Cont.		• Usage Data Delivery Accuracy SQM • Usage Timeliness & Completeness SQM The file <i>Flowthrough.XLS</i> was added to the Miscellaneous Aggregate Reports section after the beginning of the August reporting period, between 1416 on September 15 and 0812 on September 22. The following files were added from the PMAP site after the beginning of the September reporting period (between 0826 on October 18 and 0832 on October 25). • Held Order Intvl & Mean CLEC MSA • Held Order Intvl & Mean CLEC Trunks MSA The following files were added to the ATTLOCAL Miscellaneous Reports section after the beginning of the September reporting period, between 0833 on October 18 and 0857 on October 26. AT&T LOCAL • ATTLOCAL_contract_BST_avg_091999.xls • ATTLOCAL_contract_BST_retail_agg_091999.xls • ATTLOCAL_contract_BST_trunk_agg_091999.xls • ATTLOCAL_contract_CLEC_LNP_agg_091999.xls • ATTLOCAL_contract_CLEC_resale_agg_091999.xls • ATTLOCAL_contract_CLEC_trunk_agg_091999.xls • ATTLOCAL_contract_CLEC_UNE_loop_091999.xls • ICXTrunking_ATX_091999.html • Lnp_7421_091999.html • Resalerpt_7421_091999.html • UNELoop_7421_091999.html TCG AMERICA • ICXTrunking_TPM_091999.html • Lnp_7125_091999.html • Lnp_7658_091999.html • Lnp_8271_091999.html • Lnp_8392_091999.html • Resalerpt_7125_091999.html • Resalerpt_7658_091999.html • Resalerpt_8271_091999.html	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• Resalerpt_8392_091999.html • TELPTCOM_contract_BST_avg_ans_091999.xls • TELPTCOM_contract_BST_retail_agg_091999.xls • TELPTCOM_contract_BST_trunk_agg_091999.xls • TELPTCOM_contract_CLEC_LNP_agg_091999.xls • TELPTCOM_contract_CLEC_resale_agg_091999.xls • TELPTCOM_contract_CLEC_trunk_agg_091999.xls • TELPTCOM_contract_CLEC_UNE_loop_091999.xls • UNELoop_7125_091999.html • UNELoop_7658_091999.html • UNELoop_8271_091999.html • UNELoop_8392_091999.html AT&T COMMUNICATIONS • ATX_Trunk_Group_Performance.xls TCG (TELEPORT COMM. GROUP) • TPM_Trunk_Group_Performance.xls The file <i>AGG_Trunk_Group_Performance.xls</i> was added to the Miscellaneous Aggregate Reports section after the beginning of the September reporting period, between 0858 on October 26 and 0835 on October 18. The following files were added from the PMAP site after the beginning of the October reporting period (between 0931 on November 15 and 1127 on November 16). • Speed of Answer in Ordering Center SQM • OSS Interface Availability SQM (M&R) SQM 6. Operator Services • Speed to Answer Performance OS/DA SQM • Speed to Answer Performance OS/Toll SQM The following files were added from the PMAP site after the beginning of the October reporting period (between 1127 on November 16 and 1011 on November 22). • %Prov. Trouble w/i 30 Days CLEC • %Prov. Trouble w/i 30 Days CLEC (Reg) • %Prov. Trouble w/i 30 Days Trunks CLEC • %Prov. Trouble w/i 30 Days POTS CLEC • %Prov. Trouble w/i 30 Days POTS CLEC Reg • %Prov. Trouble w/i 30 Days CLEC MSA • %Prov. Trouble w/i 30 Days Trk CLEC MSA	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	SQM 1. Pre-Ordering • OSS Interface Availability SQM • %Prov. Trouble w/i 30 Days POTS SQM • %Prov. Trouble w/i 30 Days POTS SQM Reg • %Prov. Trouble w/i 30 Days Trunks SQM • %Prov. Trouble w/i 30 Days SQM (Region) • %Prov. Trouble w/i 30 Days Trunk SQM • %Prov. Trouble w/i 30 Days MSA • %Prov. Trouble w/i 30 Days Trk MSA When the help menu was accessed it stated that the Percent Provisioning reports were not available but gave no specifics as to the reason or when the reports would be ready. The following files were added to the ATTLOCAL Miscellaneous Reports section after the beginning of the October reporting period, between 1016 on November 15 and 1235 on November 22. AT&T LOCAL • ATTLOCAL_contract_BST_avg_ans_101999.xls • ATTLOCAL_contract_BST_retail_agg_101999.xls • ATTLOCAL_contract_BST_trunk_agg_101999.xls • ATTLOCAL_contract_CLEC_LNP_agg_101999.xls • ATTLOCAL_contract_CLEC_resale_agg_101999.xls • ATTLOCAL_contract_CLEC_trunk_agg_101999.xls • ATTLOCAL_contract_CLEC_UNE_loop_101999.xls • ICXTrunking_ATX_101999.html • lnp_7421_101999.html • Resalerpt_7421_101999.html • UNELoop_7421_101999.html TCG AMERICA • ICXTrunking_TPM_101999.html • lnp_7125_101999.html • lnp_7658_101999.html • lnp_8271_101999.html • lnp_8392_101999.html • Resalerpt_7125_101999.html • Resalerpt_7658_101999.html • Resalerpt_8271_101999.html • Resalerpt_8392_101999.html	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• TELPTCOM_contract_BST_avg_ans_101999.xls • TELPTCOM_contract_BST_retail_agg_101999.xls • TELPTCOM_contract_CLEC_trunk_agg_101999.xls • TELPTCOM_contract_BST_trunk_agg_101999.xls • TELPTCOM_contract_CLEC_LNP_agg_101999.xls • TELPTCOM_contract_CLEC_resale_agg_101999.xls • TELPTCOM_contract_CLEC_UNE_loop_101999.xls • UNELoop_7125_101999.html • UNELoop_7658_101999.html • UNELoop_8271_101999.html • UNELoop_8392_101999.html AT&T COMMUNICATIONS • ATX_Coordinated_Customer_Conversions.xls The following files were added to the Miscellaneous Aggregate Reports section after the beginning of the October reporting period, between 1016 on November 15 and 1235 on November 22. • Flowthrough_101999.xls • OSS_Response_Time Interval_101999.xls The ATTLOCAL Miscellaneous Reports section contained no reports and the Aggregate Reports section contained two reports at the beginning of the January reporting period (February 15, 2000). More reports were expected from both sections. If these sections are updated, the updates will be posted in the issues register. The June %Reject Svc Request Non-Mech CLEC Reg file contains inconsistent data. The 7421 Business section contains two rejects but only one LSR.	
C0069	08/23/99		<u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated. <u>September 17, 1999</u> - Letter received from BellSouth, no mention of the issue. It is hopeful that this issue will be resolved through the third party audit of BellSouth's PMAP measurement system, 1st quarter, 2000.
C0070	08/23/99	The May and June Held Order Intrvl & Mean CLEC (Region) reports have the UNE Loop with NP section broken into Facilities and Other sub-categories. The corresponding Held Order Intrvl & Mean SQM (Region) report does not contain any UNE Loop with NP sub-categories. What is the purpose of the sub-categories in the CLEC reports if they are not	<u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent and stating that a response

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		in SQM reports?	will be generated. <u>September 17, 1999</u> - Letter received from BellSouth, sub-categories provide detailed data explaining why orders are held; for proprietary reasons aggregate reports cannot display sub-categories. <u>September 28, 1999</u> - Met with BST. AT&T would like to understand BellSouth's definition of the sub-categories. Requested that the sub-categories (Facilities, Equipment, and Other) be defined in the BellSouth SQM Plan. BellSouth implemented this change without prior notification to the CLECs.
C0071	08/23/99	In the July Held Order Intvl & Mean CLEC (Region) report, all categories were split into Equipment, Facilities and, Other sub-categories. The July Held Order Intvl & Mean SQM (Region) report does not contain any sub-categories. What is the reasoning for the sudden emergence of so many new sub-categories?	<u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent and stating that a response will be generated. <u>September 17, 1999</u> - Letter received from BellSouth, sub-categories provide detailed data explaining why orders are held; for proprietary reasons aggregate reports cannot display sub-categories. <u>September 28, 1999</u> - Met with BST. AT&T would like to understand BellSouth's definition of the sub-categories. Requested that the sub-categories (Facilities, Equipment, and Other) be defined in the BellSouth SQM Plan. BellSouth implemented this change without prior notification to the CLECs.
C0073	08/23/99	Both the % Prov. Trouble w/i 30 Days CLEC and % Prov. Trouble w/i 30 Days CLEC (Reg) reports only have the data broken into ATTLOCAL and TELPTCOM categories. All other CLEC reports contain specific OCNs.	<u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated. <u>September 17, 1999</u> - Letter received from BellSouth - BST claimed there was an error in the report format for the region report, but the state report's format was not affected. <u>November 29, 1999</u> - BST stated that the change occurred once the file was moved from the Miscellaneous section to the main PMAP section.
C0074	08/23/99	The Avg Completion Notice Intvl CLEC and Avg Completion Notice Intvl CLEC (Reg)	<u>August 23, 1999</u> - Sent letter to BellSouth stating

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		files contain only 7421 Residence data. More than one service category of data was expected for these reports.	problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated. <u>September 17, 1999</u> - Letter received from BellSouth. BST only received 7421 Residence data. <u>September 28, 1999</u> - Met with BST. BST repeated answer given in 9/17 letter. AT&T asked BST to investigate issue beyond the relam of PMAP. <u>October 28, 1999</u> - Met with BST. AT&T told BST that it has received completion notices from BST but the reports show no activity.
C0075	08/23/99	The following July files contained no information. BellSouth claimed files that contained no information would not be generated. Only a message indicating a file holds no information should be generated for these reports. • OCI Non-UNE Design - Dispatch CLEC • OCI Non-UNE Design - Dispatch CLEC (Reg) • OCI Non-UNE Design - Non-Dspch CLEC • OCI Non-UNE Design - Non-Dspch CLEC Reg • OCI POTS Dispatch CLEC • OCI POTS Dispatch CLEC (Region) • % Missed Installation Appts CLEC MSA • % Missed Installation Appts Trk CLEC MSA • % Prov. Trouble w/i 30 Days CLEC MSA • % Prov. Trouble w/i 30 Days Trk CLEC MSA • Jeopardy Intvl & % Jeopardy CLEC MSA • OCI Local Interconnection Trk CLEC MSA • OCI Non-UNE Design - Dispatch CLEC MSA • OCI Non-UNE Design - Non-Dspch CLEC MSA • OCI POTS Dispatch CLEC MSA • OCI POTS Non-Dispatch CLEC MSA • OCI UNE Dispatch CLEC MSA • OCI UNE Non-Dispatch CLEC MSA • % Repeat Trbls w/in 30 days CLEC MSA • Customer Trbl Report Rate CLEC MSA • Maintenance Trbl Report Rate CLEC MSA • Missed Repair Appointments CLEC MSA	<u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated. <u>September 17, 1999</u> - Letter received from BellSouth. BST now generates blank files as an <i>enhancement</i> to PMAP. This change was unannounced. <u>September 28, 1999</u> - Met with BST. AT&T asked BST to return PMAP to its non-<i>enhanced</i> version, were only a message would be generated when a report contains no information. <u>November 29, 1999</u> - Met with BST. Discussed possibility of reinstating message instead of generating blank files.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• Out of Service > 24 Hrs CLEC MSA The following August files contained no information. • OCI Non-UNE Design – Non-Dspch CLEC • OCI Non-UNE Design – Non-Dspch CLEC Reg • OCI POTS Dispatch CLEC • OCI POTS Dispatch CLEC (Region) • % Missed Installation Appts CLEC MSA • % Missed Installation Appts Trk CLEC MSA • % Prov. Trouble w/i 30 Days CLEC MSA • % Prov. Trouble w/i 30 Days Trk CLEC MSA • Avg. Completion Notice Interval CLEC MSA • Held Order Intvl & Mean CLEC MSA • Jeopardy Intvl & % Jeopardy CLEC MSA • OCI Local Interconnection Trk CLEC MSA • OCI Non-UNE Design – Dispatch CLEC MSA • OCI Non-UNE Design – Non-Dspch CLEC MSA • OCI POTS Dispatch CLEC MSA • OCI POTS Non-Dispatch CLEC MSA • OCI UNE Dispatch CLEC MSA • OCI UNE Non-Dispatch CLEC MSA • % Repeat Trbls w/in 30 days CLEC MSA • Customer Trbl Report Rate CLEC MSA • Maintenance Trbl Report Rate CLEC MSA • Missed Repair Appointments CLEC MSA • Out of Service > 24 Hrs CLEC MSA • % Prov. Trouble w/i 30 Days Trk MSA The following September files contained no information. • Held Order Intvl & Mean Trunks CLEC • OCI Non-UNE Design – Non-Dspch CLEC • OCI Non-UNE Design – Non-Dspch CLEC Reg • % Missed Installation Appts CLEC MSA • % Missed Installation Appts Trk CLEC MSA • % Prov. Trouble w/i 30 Days CLEC MSA • % Prov. Trouble w/i 30 Days Trk CLEC MSA • Avg. Completion Notice Interval CLEC MSA	

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
	Issue Cont.	• Held Order Intvl & Mean CLEC MSA • Held Order Intvl & Mean CLEC Trunks MSA • Jeopardy Intvl & % Jeopardy CLEC MSA • OCI Local Interconnection Trk CLEC MSA • OCI Non-UNE Design - Dispatch CLEC MSA • OCI Non-UNE Design - Non-Dspch CLEC MSA • OCI POTS Dispatch CLEC MSA • OCI POTS Non-Dispatch CLEC MSA • OCI UNE Dispatch CLEC MSA • OCI UNE Non-Dispatch CLEC MSA • % Repeat Trbls w/in 30 days CLEC MSA • Customer Trbl Report Rate CLEC MSA • Maintenance Trbl Report Rate CLEC MSA • Missed Repair Appointments CLEC MSA • Out of Service > 24 Hrs CLEC MSA • Held Order Intvl & Mean Trunks MSA The following October files contained no information. • OCI Non-UNE Design - Dispatch CLEC • OCI Non-UNE Design - Dispatch CLEC (Reg) • OCI Non-UNE Design - Non-Dspch CLEC • OCI Non-UNE Design - Non-Dspch CLEC Reg • %Prov. Trouble w/i 30 Days CLEC MSA • %Prov. Trouble w/i 30 Days Trk CLEC MSA • Avg. Completion Notice Interval CLEC MSA • Held Order Intvl & Mean CLEC Trunks MSA • Jeopardy Intvl & % Jeopardy CLEC MSA • OCI Non-UNE Design - Non-Dspch CLEC MSA • OCI POTS Dispatch CLEC MSA • OCI POTS Non-Dispatch CLEC MSA • OCI UNE Dispatch CLEC MSA • OCI UNE Non-Dispatch CLEC MSA	
C0077	08/23/99	The PMAP site has been particularly unstable at the beginning of the July reporting period. The site has often been too slow to extract any data from. Often the PMAP site has gone completely down. Some features on PMAP such as the titles of the reports appearing in the internet browser are only working sporadically.	<u>August 23, 1999</u> - Sent letter to BellSouth stating problems encountered. <u>September 10, 1999</u> - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
C0078	11/29/99	BellSouth claims to have its raw data posted in a timely and accurate manner, but it is not. September raw data was initially posted as October raw data on November 29, 1999. October raw data was eventually posted, but not all files were posted. Some files have not been retrieved. February 15th, the January raw data cannot be accessed. The message <i>Database Problem detected</i> appears when a raw data file trying to be downloaded. BellSouth has added and deleted raw data files without notification or explanation. New Files: • Provisioning: Average Completion Notice Interval • Provisioning: Jeopardy Notice Interval Deleted Files: • Provisioning: Trouble Within 30 Days Provisioning – Non-Trunk • Provisioning: Trouble Within 30 Days Provisioning – Trunk Percent Provisioning Troubles Within 30 Days: Total Percentage is calculated incorrectly. BellSouth adds the "Percentage for Dispatch" to the "Percentage for Non-Dispatch" to obtain the Total Percentage. BellSouth source for the calculation is the percentage results. BellSouth should use the volume of troubles and the volume of orders for both Dispatch and Non-Dispatch to calculate the Total Percentage.	<u>September 17, 1999</u> – Letter received from BellSouth, no mention of the issue. <u>September 28, 1999</u> – Met with BST. BST stated that the PMAP site stabilizes a few days after the reports have been posted. <u>October 28, 1999</u> – Met with BST. Discussed with BST the instability of the PMAP site. <u>November 29, 1999</u> – Met with BST. Discussed with Brian. Brian had already notified Debbie Gardner. <u>December 1999</u> – Talked to Brian, assured AT&T that files are being accessed and will be sent over to AT&T.
C0079	11/99	• Provisioning: Average Completion Notice Interval • Provisioning: Jeopardy Notice Interval Deleted Files: • Provisioning: Trouble Within 30 Days Provisioning – Non-Trunk • Provisioning: Trouble Within 30 Days Provisioning – Trunk Percent Provisioning Troubles Within 30 Days: Total Percentage is calculated incorrectly. BellSouth adds the "Percentage for Dispatch" to the "Percentage for Non-Dispatch" to obtain the Total Percentage. BellSouth source for the calculation is the percentage results. BellSouth should use the volume of troubles and the volume of orders for both Dispatch and Non-Dispatch to calculate the Total Percentage.	<u>September 28, 1999</u> – Met with BST. Described to BST the problem. <u>October 28, 1999</u> – Met with BST. Discussed the problem with BST. <u>November 29, 1999</u> – Letter sent to BST, addressing the problem. <u>November 29, 1999</u> – Met with BST. Re-explained the problem.
C0080	9/28/99	Percent Provisioning Troubles Within 30 Days: Total Percentage is calculated incorrectly. BellSouth adds the "Percentage for Dispatch" to the "Percentage for Non-Dispatch" to obtain the Total Percentage. BellSouth source for the calculation is the percentage results. BellSouth should use the volume of troubles and the volume of orders for both Dispatch and Non-Dispatch to calculate the Total Percentage.	<u>September 28, 1999</u> – Met with BST. Described to BST the problem. <u>October 28, 1999</u> – Met with BST. Discussed the problem with BST. <u>November 29, 1999</u> – Letter sent to BST, addressing the problem. <u>November 29, 1999</u> – Met with BST. Re-explained the problem.
C0081	10/28/99	Average Completion Notice Interval – CLEC Aggregate: Data deficiency – Time segment "00-01 Hour" is populated with data (1 Order); but the "Average Interval" contains no data (0).	<u>October 28, 1999</u> – Met with BST. Discussed the problem with BST. <u>November 29, 1999</u> – Met with BST. BST informed AT&T that they are investigating the problem. <u>November 29, 1999</u> – Letter sent to BST, addressing the problem.
C0082	1/21/00	The AT&T FOC timeliness raw data file contains repeating data, horizontally across the page. Illustrative example:	<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION				STATUS
		OCN	Date	Time	Duration	
		7421	12/1	10:00	5.62	
C0083	1/21/00	The AT&T FOC timeliness raw data file lists most of the AT&T mechanized PONs as non-mechanized. The following List of PONs were sent to BellSouth over a mechanized interface, but were reported by BellSouth as non-mechanized:				<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
		• A9910TUCKGA00222 • A9910TUCKGA00537 • A9910TUCKGA00534 • A9911TUCKGA00015 • A9912TUCKGA00197				
C0084	1/21/00	The AT&T PON A9910TUCKGA00550 is not listed in the FOC timeliness raw data file, even though AT&T shows this PON received a FOC in December.				<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0085	1/21/00	The AT&T Average Completion Notice Interval raw data file does not contain AT&T ADL PONs. The following list of PONs is a sample of the orders completed by AT&T in December; and which should be included in the raw data file.				<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
		• A9910TUCKGA00222 • A9910TUCKGA00298 • A9910TUCKGA00377 • A9911TUCKGA00485 • A9912TUCKGA00534 • A9912TUCKGA00537 • A9912TUCKGA00550				
C0086	1/21/00	The TCG Average Completion Notice Interval raw data file contains no data.				<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0087	1/21/00	The TCG FOC timeliness raw data file lists FOC duration with no dates. Illustrative example:				<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
		OCN	PON	FIRST_RCVD	LAST_RCVD	FOC_DATE
		7421	007			45.26
		The TCG PON ZXSSABSABN118 illustrates this problem.				
C0088	1/21/00	The TCG Reject Interval and Percent Reject by Interval raw data file lists reject duration with no dates. Illustrative example:				<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
		OCN	PON	FIRST_RCVD	LAST_RCVD	FIRST_INCLR
		7421	007			LAST_INCLR
						45.26

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		The TCG PON ZXSA8ABN118 illustrates this problem.	
C0089	1/21/00	The collocation report for November and December do not contain data for the entire month. Both months only contain data through the 21st.	<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0090	1/21/00	The LNP reports for November and December are missing non-mechanized data.	<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0091	1/21/00	The November file 7421_LNP_PCT_Reject_Interval_Service_Requests_Fully_Mech.txt contains in the region section 3 entries in the 0-4 minute interval but contains an average interval of 0.	<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0092	1/21/00	The November files 7421_Firm_Order_Confirmation_Fully_Mechanized.txt and LNP_Firm_Order_Confirmation_Fully_Mechanized_111999.txt both contain entries in the interval portion of the region section, but contain a average of zero.	<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0093	1/21/00	The LNP Percent Missed Installation Appointments files do not distinguish its data for less than ten circuits and greater than ten circuits. The other Percent Missed Installation Appointments files on PMAP do make this distinction.	<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0094	1/21/00	The October file %Reject_Svc_Request_Non-Mech_CLEC (Reg) contains one reject but no LSRs for the 7421 UNE Loop w/ NP service category.	<u>January 21, 2000</u> – E-mail sent to BST, addressing the problem.
C0095	2/14/00	BST's Firm Order Confirmation (FOC) and Reject Raw Data files contain no records for Mechanized data. Some of the records that BST lists as Non-Mechanized are actually Mechanized. December, 1999 PONs are listed as an example: A9910TUCKGA00222 A9910TUCKGA00537 A9911TUCKGA00015 A9911TUCKGA00284 A9911TUCKGA00382 A9911TUCKGA00241 A9912TUCKGA00002 A9912TUCKGA00003 A9912TUCKGA00006 A9912TUCKGA00011 A9912TUCKGA00026 A9912TUCKGA00106 A9912TUCKGA00088 A9912TUCKGA00094 A9912TUCKGA00160 A9912TUCKGA00107 A9912TUCKGA00127 A9912TUCKGA00177 A9912TUCKGA00162 A9912TUCKGA00169 A9912TUCKGA00198 A9912TUCKGA00186 A9912TUCKGA00197 A9912TUCKGA00236 A9912TUCKGA00224 A9912TUCKGA00235 A9912TUCKGA00236 A9912TUCKGA00262 A9912TUCKGA00290 A9912TUCKGA00293 A9912TUCKGA00313	<u>February 14, 2000</u> – Notified BST via e-mail of the problem. Plan to discuss with BST further at meeting on 2/17/00.
C0096	2/14/00	BST's FOC Raw Data File reveals that FOCs were distributed to AT&T after the completion date. December, 1999 PONs are listed as an example: A9910TUCKGA00537 A9912TUCKGA00160	<u>February 14, 2000</u> – Notified BST via e-mail of the problem. Plan to discuss with BST further at meeting on 2/17/00.
C0097	2/14/00	BST's Reject Raw Data file reveals that BST indiscriminately uses the fields FIRST_RCVD and FIRST_INCLR to calculate the reject interval. This action results in BST using a previous PON version as the sent time along with the current reject version. The reject interval becomes disproportionately large. December, 1999 PONs are listed as an example: A9912TUCKGA00063 A9912TUCKGA00160	<u>February 14, 2000</u> – Notified BST via e-mail of the problem. Plan to discuss with BST further at meeting on 2/17/00.

OPEN BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
C0098	2/14/00	BSI's December FOC Raw Data file incorrectly lists the PON A9911TUCKGA00241 as A9911TUCKGA241.	<i>February 14, 2000</i> – Notified BST via e-mail of the problem. Plan to discuss with BST further at meeting on 2/17/00.
C0099	2/14/00	BSI's December Reject Raw Data file lists the PON A9912TUCKGA00204 as having a version number as zero even though it shows two distinctly different dates in the <i>FIRST_RCVD</i> and <i>LAST_RCVD</i> columns. AT&T does not believe this is consistent with BellSouth's ordering guidelines. At least two versions should be indicated in BST's records, or the <i>FIRST_RCVD</i> and <i>LAST_RCVD</i> dates and times should match.	<i>February 14, 2000</i> – Notified BST via e-mail of the problem. Plan to discuss with BST further at meeting on 2/17/00.

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
C0001	08/13/98	BST Performance Web Site - Availability. The web site availability is unreliable. Access is denied for part or all day.	CLOSED - December 16, 1998; BellSouth is responsive to telephone calls and acknowledges that the site is down. When site is unavailable, call the system administrator immediately. AT&T Web Server could be the source of the trouble. <u>February 5, 1999</u> - BST records for the WebServer indicated the following unplanned outages: 12-22 & 85 min. & 137 min.; 12-29 4 min. Note: this list does not include planned outages. <u>October 9, 1998</u> - AT&T/BST Web Site Meeting. Raised issues in the meeting. <u>December 16, 1998</u> - Data Retrieval. Reliability seems to have improved over the past two months. <u>August 13, 1998</u> - Data Retrieval: The web site availability is unreliable. Access is denied for part or all day. The web site was not available for part or all of the day on the following dates: August 13, 14, 17, 18, 21, 25, 26 and October 5, 1998.
C0002	10/09/98	BST Performance Web Site - Raw Data Files Date & Time Stamp Format. Elapsed time value exists in date & time stamp fields of raw data files.	CLOSED - December 21, 1998; AT&T confirmed that formatting was incorrect. <u>December 07, 1998</u> - Letter from Jan Burriss (BST) to Pam Nelson (AT&T). "AT&T imported the raw data file into an EXCEL spreadsheet with inaccurate formatting (AT&T failed to display the EXCEL cells for this column in the proper date/time format) of the cells which caused the Time Stamp data to display incorrectly." <u>October 9, 1998</u> - AT&T/BST Web Site Meeting. Elapsed time value exists in date and time stamp fields of raw data files.
C0003	10/09/98	BST Performance Web Site - Insufficient Navigation Instructions. BST cannot demonstrate that the web based raw data is sufficient to reconstruct the web based AT&T reports.	CLOSED - February 4, 1999; BST hosted a Raw Data Tutorial on 12/21/1998 and recreated the Order Completion Interval Report for AT&T using the measurement methodology set forth in the SQM. <u>December 07, 1998</u> - Letter from Jan Burriss (BST) to Pam Nelson (AT&T) "the information is the same as that stored in the Data Warehouse for AT&T and this data is sufficient to duplicate the BST Service Quality Measurement (SQM) reports posted to the web site." <u>November 6, 1998</u> - Deposition of Phil Porter (BST) pg. 66; <u>October 9 1998</u> - AT&T/BST Web Site

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
			Meeting. BST cannot demonstrate that the web based raw data is sufficient to reconstruct the web based AT&T reports.
C0004	10/09/98	BST Performance Web Site - Report/Raw Data Mapping Instructions. Instructions do not exist which map the raw data files data elements to reports.	CLOSED - <u>January 12, 1999</u> ; BST provided a Report/Raw Data Matrix to AT&T on 01-12-99. The matrix maps the raw data files to the reports. <u>November 06, 1998</u> - Deposition of Phi Porter (BST) pg. 62-74; <u>October 09, 1998</u> - AT&T/BST Web Site Meeting. Instructions do not exist which map the raw data files data elements to reports.
C0005	10/09/98	BST Performance Web Site - Raw Data Files Missing Data. Missing data values (PONs) in raw data files.	CLOSED - <u>February 4, 1999</u> ; BST includes all records in its raw data files, including its own record orders. PONs are not applicable to BST generated record orders. <u>October 09, 1998</u> - AT&T/BST Web Site Meeting. Missing data values in raw data files.
C0006	10/09/98	BST Performance Web Site - Access and Local Records Co-mingled. Access Records co-mingled with Local Records.	CLOSED - <u>February 4, 1999</u> ; Due to the nature in which AT&T is ordering interoffice trunking, these records contain the appropriate data. <u>October 09, 1998</u> - AT&T/BST Web Site Meeting. Access Records co-mingled with Local Records.
C0007	10/09/98	BST Performance Web Site - Password Change Effective Date. The password required to access the CLEC Specific reports is automatically changed on a 60 day cycle. The newly generated password is not activated on the same date as the expiration date of the old password. Therefore, at least one day of web site availability is lost.	CLOSED - <u>February 4, 1999</u> ; BST resolved this issue. Password now is in effect, immediately. <u>October 09, 1998</u> - AT&T/BST Web Site Meeting. The password required to access the CLEC Specific reports is automatically changed on a 60 day cycle. The newly generated password is not activated on the same date as the expiration date of the old password. Therefore, at least one day of web site availability is lost.
C0008	10/09/98	BST Performance Web Site - Raw Data Files Duplicate PONs. Duplicate Purchase Order Numbers (PONs) in at least four raw data files.	CLOSED - <u>July 21, 1998</u> ; Issue is resolved and AT&T has monitored for several months. <u>October 9, 1998</u> - AT&T/BST Web Site Meeting. Duplicate Purchase Order Numbers (PONs) in at least four raw data files. August Data: Raw Data File 04: End User, Raw Data File 34: Ordering-ASR (Seg1), Raw Data File 36: Ordering-Error (LEO), & Raw Data File 37; Ordering-Error Reject (LEO). <u>February 4, 1999</u> - PONs submitted by a CLEC could generate more than one LSR or service order in BST's systems. This depends upon what type of service is being requested by the

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
			CLEC. <u>March 18, 1999</u> – BST's Position: PONs submitted by a CLEC could generate more than one LSR or service order. This depends upon what type of service is being requested by the CLEC. AT&T's Position: PONs are not associated to LSRs in the files that prompted this issue. <u>CLOSED - February 4, 1999</u>; The CKT_Id Field provides a unique identifier for each circuit within each trunk group. "CKT ID" is the fourth field in the raw data: maintenance_designed_circuit file. <u>October 09, 1998</u> – AT&T/BST Web Site Meeting. Individual circuits cannot be identified within Trunk Group – Maintenance Circuit History. August Data: Raw Data File 06: Maintenance – Designed – Circuit History. <u>CLOSED - February 4, 1999</u>; Ordering_Error file contains ordering information. Ordering_Error Reject file, contains reject information. Please refer to the Raw Data Matrix. <u>October 09, 1998</u> – AT&T/BST Web Site Meeting. No differentiation in order universe between Ordering – Error (LEO) and Ordering – Error Reject (LEO). August Data: Raw Data File 36: Ordering – Error (LEO) and Raw Data File 37: Ordering – Error Reject (LEO). <u>CLOSED - February 4, 1999</u>; BST updated the Raw Data Glossary Section to include this information. <u>October 09, 1998</u> – AT&T/BST Web Site Meeting. Ordering – Error Reject (LEO): "severity_level" not defined: Clarification, Error, Reject. August Data: Raw Data File 37: Ordering – Error Reject (LEO). <u>CLOSED - July 21, 1999</u> –; User Guide Developed and Published. <u>October 9, 1998</u> – AT&T/BST Web Site Meeting. Ordering – LSR Audit Reject: "notes_type" not defined. August Data: Raw Data File 39: Ordering – LSR Audit Reject. <u>January 26, 1999</u> – BST/AT&T have agreed to develop in the next 60 days a user guide expanding the definitions. <u>March 18, 1999</u> – AT&T received a draft copy of the user guide. <u>April 22, 1999</u> – Initial analysis is nearly complete. <u>CLOSED - December 21, 1998</u>; AT&T confirmed that
C0009	10/09/98	BST Performance Web Site - Raw Data Trunk Group Circuit IDs. Individual circuits cannot be identified within Trunk Group – Maintenance Circuit History.	
C0010	10/09/98	BST Performance Web Site - Raw Data Files (Error & Error Reject). No differentiation in order universe between Ordering – Error (LEO) and Ordering – Error Reject (LEO).	
C0011	10/09/98	BST Performance Web Site - Raw Data Schema Definition Deficiency. Ordering – Error Reject (LEO): "severity_level" not defined.	
C0012	10/09/98	BST Performance Web Site - Raw Data Schema Definition Deficiency. Ordering – LSR Audit Reject: "notes_type" not defined.	
C0013	10/09/98	BST Performance Web Site - Raw Data Files Date & Time Stamp Format. Ordering	

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		- LSR Audit Reject: "notes_ts" contains elapsed time, but does not contain time stamp. Ordering - Mechanized LSR: "create_timestamp" contains elapsed time, but does not contain time stamp.	formatting was incorrect. <u>December 16, 1998</u> - Data Retrieval. Raw data file is CGI format on the BST web site. When imported to Microsoft Excel, the format must be changed. If the application extension is changed to HTML, the time stamp appears in its original format and is a time stamp, not an elapsed time. <u>October 9, 1998</u> - AT&T/BST Web Site Meeting. Ordering - LSR Audit Reject: "notes_ts" contains elapsed time, but does not contain time stamp. Ordering - Mechanized LSR: "create_timestamp" contains elapsed time, but does not contain time stamp. August Data: Raw Data File 39: Ordering - LSR Audit Reject & Raw Data File 40: Ordering Mechanized LSR.
C0014	10/09/98	BST Performance Web Site - Raw Data Schema Definition Deficiency. Ordering - Mechanized LSR Reject: Ordering - Non Mechanized "reqtype." Definition states "and the status of the request." Where is the status?	<u>CLOSED</u> - <u>July 21, 1999</u>; User Guide Developed and Published. <u>October 9, 1998</u> - AT&T/BST Web Site Meeting. Ordering - Mechanized LSR Reject: Ordering - Non Mechanized. "reqtype" definition states "and the status of the request." Where is the status? <u>January 26, 1999</u> - BST/AT&T have agreed to develop in the next 60 days a user guide expanding the definitions. <u>March 18, 1999</u> - AT&T received a draft copy of the user guide.
C0015	10/09/98	BST Performance Web Site - Non-Mechanized VS Mechanized PONs. Provisioning - Service Order (LCSC): The universe of Purchase Order Numbers (PONs) cannot be distinguished between: Non-Mechanized; Partially Mechanized; & Mechanized	<u>CLOSED</u> - <u>February 4, 1999</u>; Provisioning orders are not separated between mechanized and non-mechanized. They are separated by dispatch and non-dispatch. Also, BST no longer has the category partially mechanized. <u>October 09, 1998</u> - AT&T/BST Web Site Meeting. Provisioning - Service Order (LCSC): The universe of Purchase Order Numbers (PONs) cannot be distinguished between: Non-Mechanized, Partially Mechanized & Mechanized.
C0016	10/09/98	BST Performance Web Site - Raw Data Schema Definition Deficiency. Provisioning - Service Order (LCSC): Clarification is needed for: "application_date"	<u>CLOSED</u> - <u>February 4, 1999</u>; BST updated the definition in the Web Based Reports Glossary. application_date, Date the customer requested the order, issue_date, Date on which the order was entered into the system. <u>October 09, 1998</u> - AT&T/BST Web Site Meeting. Provisioning - Service Order (LCSC): Clarification is needed for: "application_date" & "Issue_date."

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
C0017	10/09/98	BST Performance Web Site - Raw Data Schema Definition Deficiency. Ordering - Mechanized LSR: "signinout_cuid" - what is the significance of this field?	CLOSED - February 4, 1999; BST updated the definition section of the Web Based Reports. This field provides a unique identifier for the BST Service Representative or mechanized system responsible for processing the request. October 09, 1998 - AT&T/BST Web Site Meeting. Ordering - Mechanized LSR: "signinout_cuid" - what is the significance of this field?
C0018	10/09/98	BST Performance Web Site - Reports & Raw Data Availability. Data for only one previous period is available on the web site at any given time.	CLOSED - February 4, 1999; BST advises all users of the Web Based Reports in the user instructions that only one month's worth of data would be present. It will be each customer's responsibility to retain previous month's data. October 16, 1998 - Data Retrieval. Data for only one previous period is available on the web site at any given time.
C0019	10/16/98	BST Performance Web Site - Schema Change Notice. Schema column order changes from month to month without notice.	CLOSED - February 4, 1999; BST periodically changes information in the Web Based Reports. BST added a change notice section to the web to notify users. The section is entitled, "Monthly Site Update Log". October 16, 1998 - Data Retrieval. Schema column order changes from month to month without notice. Raw Data File: Customer. August & September Data: Automatic Downloading and Formatting coding must be changed each month which is non productive and expensive.
C0020	10/16/98	BST Performance Web Site - Unknown Reporting Period. The reporting period is not identified. The data files must be opened to distinguish the reporting period.	CLOSED - February 4, 1999; BST agrees to include F17e this information in PMAP. October 16, 1998 - Data Retrieval. The reporting period is not identified. The data files must be opened to distinguish the reporting period.
C0021A	10/16/98	BST Performance Web Site - Raw Data File types are not consistent. Four different file formats exist: Text, HTML, CGI, Microsoft Excel. Each file format carries its own peculiar brand of problems. Text Formatted Files: Online viewing - OK; Downloading - No option to download; must be saved. Formatting is lost. Data "wraps around" to the next line. Files are not readable and cannot be used without reformatting. Text file format is preferred only second to the Microsoft Excel file format.	CLOSED - February 4, 1999; Data is extracted from different sources resulting in data being stored in different formats. BST's new PMAP uses the Microsoft Excel Spreadsheet format. October 16, 1998 - Numerical information - what prevents BellSouth from presenting files in Microsoft Excel format?
C0021B	10/16/98	BST Performance Web Site - Raw Data File types are not consistent. Four different file formats exist: Text, HTML, CGI, Microsoft Excel. Each file format carries its own peculiar brand of problems. HTML Formatted Files: Online viewing - OK; Downloading - No option to download; must be saved. Formatting is lost. Data "wraps	CLOSED - February 4, 1999; Data is extracted from different sources resulting in data being stored in different formats. BST's new PMAP uses the Microsoft Excel Spreadsheet format. October 16, 1998 -

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		around" to the next line. Files are not readable and cannot be used without reformatting.	Numerical information – what prevents BellSouth from presenting text files in Microsoft Excel format?
C0021C	10/16/98	BST Performance Web Site - Raw Data File types are not consistent. Four different file formats exist: Text, HTML, CGI, Microsoft Excel. Each file format carries its own peculiar brand of problems. CGI Formatted Files: Online viewing – OK; Downloading – No option to download; must be saved. Formatting is lost. Data "wraps around" to the next line. CGI format can only be viewed through web browser. Files are not readable and cannot be used without reformatting after being saved to the CLECs storage device.	CLOSED - February 4, 1999; Data is extracted from different sources resulting in data being stored in different formats. BST's new PMAP uses the Microsoft Excel Spreadsheet format. <u>October 16, 1998</u> - Numerical information – what prevents BellSouth from presenting text files in Microsoft Excel format?
C0021D	10/16/98	BST Performance Web Site - Raw Data File types are not consistent. Four different file formats exist: Text, HTML, CGI, Microsoft Excel. Each file format carries its own peculiar brand of problems. Microsoft Excel Formatted Files: Online viewing – Headings are obscured. Downloading – Option to download. Formatting is accurate. <i>The Microsoft Excel file format is preferred for all files.</i>	CLOSED - February 4, 1999; Data is extracted from different sources resulting in data being stored in different formats. BST's new PMAP uses the Microsoft Excel Spreadsheet format. <u>October 16, 1998</u> - Numerical information – what prevents BellSouth from presenting text files in Microsoft Excel format?
C0022	10/16/98	BST Performance Web Site - Coordinated Cutover Report. Ordering – Mechanized LSR raw data file: "create_timestamp" contains date and time stamp for the LSR create date and time. "completion_date" contains date for LSR completion only. A completion time of day does not exist. How can "On-Time Provisioning" be calculated for coordinated cut-overs?	CLOSED - February 4, 1999; BST does not use the <i>Ordering Mechanized LSR Raw Data File to compute the Coordinated Cut Over Report. This is a manual report and its raw data is not stored in the Data Warehouse. December 16, 1998</i> - Data Retrieval. Ordering – Mechanized LSR raw data file: "create_timestamp" contains date and time stamp for the LSR create date and time. "completion_date" contains date for LSR completion only. A completion time of day does not exist. How can "On-Time Provisioning" be calculated for coordinated cut-overs?
C0023	12/16/98	BST Performance Web Site - Test Orders Excluded From Reports. Test orders are excluded from BellSouth's reports without concurrence from AT&T. Test orders should be included and reported as production results.	CLOSED - July 21, 1999; BellSouth has discontinued inclusion of test orders. Test Orders which were included were primarily UNE-P. <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: BellSouth uses the inclusions and exclusions as outlined in the SQM Guidelines. AT&T's Position: The exclusions do not specify test orders.
C0024	12/21/98	BST Performance Web Site - Report Files All Have The Same Exact Name. File names are the same for all CLEC Specific "Performance Report" files (index.cgi). CGI format	CLOSED - July 21, 1999; <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: With the implementation of the new BellSouth Performance Measurements Processor, the file format will change. <u>April 15, 1999</u> - BST implemented PMAP, Analysis is beginning.

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
C0025	01/05/99	BST Performance Web Site - Raw Data Files All Have The Same Exact Name. File names are the same for all CLEC Specific "Raw Data" files (index.). HTML format	CLOSED – <u>July 21, 1999</u> ; Changed with the implementation of PMAP. <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST Position: PMAP will allow you to individually save each raw data file. AT&T Position: The current system allows each raw data file to be saved. BST's response does not address the issue. <u>April 15, 1999</u> - BST implemented PMAP. Analysis is beginning.
C0028	01/05/99	BST Performance Web Site - Like Reports; Different Format. Format is different for CLEC Specific reports versus CLEC Aggregate reports of the same type. i.e. "Regional Reports" do not provide the report universe (volumes). Only a percentage is provided. I.e. "Firm Order Confirmation - Non Mechanized" - "Regional Reports" section.	CLOSED – <u>July 21, 1999</u> ; <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: For aggregate reports, BellSouth will only provide percentages. Providing state specific volumes could reveal CLEC specific activity. AT&T's Position: BellSouth should provide a Regional Volume.
C0030	01/05/99	BST Performance SQM Plan - "Excluded Situations" Requires Clarification. "Provisioning - Average Completion Interval & Order Completion Interval Distribution - Resale Dispatch and Resale Non Dispatch report" The Service Quality Measurement plan "Excluded Situations:" does not reflect ALL of the record types that BST excludes from the report.	CLOSED – <u>July 21, 1999</u> ; User Guide Developed and Published. <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: BellSouth will continue refining the SQM Guidelines, as additional information becomes available. AT&T's Position: All record types need to be identified and included for the "Excluded Situations" section of BST's SQM Plan. <u>April 22, 1999</u> - Initial analysis is nearly complete.
C0031	01/21/99	BST Performance Web Site - Raw Data Schema Definition Deficiency. "Raw Data: Provisioning - Service Order (LCSC)" schema does not define the value of "C" in the "general_class_svc" column. Record may be invalid record.	CLOSED – <u>July 21, 1999</u> ; User Guide Developed and Published. <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: This definition will be included in the comprehensive Users Guide. <u>April 22, 1999</u> - Initial analysis is nearly complete.
C0032	01/21/99	BST Performance Web Site - Raw Data Schema Definition Deficiency. "Raw Data: Provisioning - Service Order (LCSC)" schema does not define the value of "L" and "M" in the "appt_code" column. Record may be invalid record.	CLOSED – <u>July 21, 1999</u> ; User Guide Developed and Published. <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: This definition will be included in the comprehensive Users Guide. <u>April 22, 1999</u> - Initial analysis is nearly complete.
C0033	01/21/99	BST Performance Web Site - Raw Data Schema Definition Deficiency. "Raw Data: Provisioning - Service Order (LCSC)" invalid "man_codes" of 2Y001, R8000, and S2RRO.	CLOSED – <u>July 21, 1999</u> ; <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's Position: These MAN codes were established for testing purposes. This process has now been changed so the codes should no longer appear in AT&T's raw data.
C0034	01/21/99	BST Performance Web Site - Raw Data Files Date & Time Stamp Format. "Raw Data: Provisioning - Service Order (LCSC)" all time stamps reflect a time of 12:00 AM.	CLOSED – <u>July 21, 1999</u> ; <u>February 4, 1999</u> - Presented issue to BST. <u>March 18, 1999</u> - BST's

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CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
			Position: Some columns are date and time stamps; others are only dates or time stamps. This file contains a column which is date specific with no time stamp.
C0035	01/21/99	BST Performance Web Site - Raw Data File; Inaccurate Data. "Raw Data: Provisioning - Service Order (LCSC)" raw data file includes invalid data in the "acna" column. ATX is AT&T's Access Carrier Name Abbreviation (ACNA). MCI and NVE records are commingled with AT&T records in the November 1998 raw data file.	CLOSED - July 21, 1999; February 4, 1999 - Presented issue to BST March 18, 1999 - BST's Position: This problem was corrected on the current system in January, 1999. Also, this situation will not occur in PMAP.
C0036	01/22/99	BST Performance Web Site - Raw Data Schema Definition Deficiency. "Raw Data: Circuit/State Cross-Reference" schema does not specify the company for "mco - Maintenance Control Office unique identifier" The data seems to reflect the mco of BellSouth.	CLOSED - July 21, 1999; Resolved in PMAP. February 4, 1999 - Presented issue to BST. March 18, 1999 - BST's Position: The MCO reflected in the BellSouth raw data is BellSouth's control office.
C0037	01/22/99	BST Performance Web Site - Raw Data Schema Definition Deficiency. "Raw Data: Provisioning Designed" schema does not specify the company for "mco - Maintenance Control Office unique identifier" The data seems to reflect the mco of the CLEC.	CLOSED - July 21, 1999; Resolved in PMAP. February 4, 1999 - Presented issue to BST. March 18, 1999 - BST's Position: The MCO reflected in the BellSouth raw data is BellSouth's control office.
C0038	01/22/99	BST Performance Web Site - Raw Data Schema Definition Deficiency. "Raw Data: Provisioning Designed" schema does not define "stat - Order Status." Values in the raw data file which may not be all inclusive are "HI, IE, IK, IX, & PC."	CLOSED - July 21, 1999; Resolved in PMAP. February 4, 1999 - Presented issue to BST. March 18, 1999 - BST's Position: This definition will be included in the comprehensive User's Guide. April 22, 1999 - Initial analysis is nearly complete.
C0039	01/22/99	BST Performance Web Site - Guidelines For Report Exclusions. Written guidelines do not exist describing the process and sequence of excluding records from the raw data to recreate reports.	CLOSED - July 21, 1999; User Guide Developed and Published. February 4, 1999 - Presented issue to BST. March 18, 1999 - BST's Position: The new User's Guide will provide a section on recreating reports using the raw data. April 22, 1999 - Initial analysis is nearly complete.
C0041	01/22/99	BST Performance Web Site - New Reports and Raw Data System. BellSouth is changing system hardware and software for its "data warehouse." System is scheduled for implementation in March, 1999. Will CLECs have to change existing coding to accommodate new BST file formats?	CLOSED - July 21, 1999; February 4, 1999 - Presented issue to BST. March 18, 1999 - BST's Position: Yes. Presented issue to BST. March 18, 1999 - BST's Position: Yes.
C0042	05/17/99	AT&T and TCG performance results mirror the CLEC Aggregate reports. The CLEC Aggregate reports do not contain any results other than AT&T and TCG. April Reports affected: - Percent Reject Service Requests - Mechanized - Percent Reject Service Requests - Non-Mechanized - FOC Timeliness - Fully-Mechanized - FOC Timeliness - Partially-Mechanized	May 28, 1999 - Met with BellSouth. June 1, 1999 - Letter sent reviewing meeting notes. June 3, 1999 - BST called, stating that they had discovered this issue. June 4, 1999 - sent e-mail to BellSouth asking for date of resolution. June, 1999 - correct data posted on PMAP.

CLOSED BELL SOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		• FOC Timeliness – Non-Mechanized • Reject Interval – Mechanized • Reject Interval – Non-Mechanized • Held Order Interval & Mean • OCI Non-UNE Design – Dispatch • OCI POTS Non-Dispatch • OCI UNE Dispatch • OCI UNE Non-Dispatch • Percent Troubles Within 30 Days • Percent Troubles Within 30 Days – Sum • Customer Trouble Report Rate • Customer Trouble Report Rate – Sum • Maintenance Average Duration	CLOSED
C0043	05/19/99	Issue Cont. Percent Reject Service Reports for April: The denominator is the sum of the total volumes from each service type. This error inaccurately lowers the percentage error. $\% = x_d / y_d$ $\neq x_d / (y_a + y_b + y_c + y_d)$	<u>June 15, 1999</u> - Service Specific Percentages added for May reports. BST Resolved. CLOSED.
C0044	05/19/99	Percentages for the April reports are shown as decimals but reported as percent. (.5% instead of 50%).	<u>June 15, 1999</u> - BST claims the problem occurs when the file is exported from the PMAP. BST states that the user can redefine the numbers to display as a percentage once the file is downloaded. CLOSED
C0045	05/19/99	Data inconsistent. The Interval 26-30 Days Column contains one item and no other column contains any data. The Average Interval column is 32.0 Days. April Reports affected: • OCI Non-UNE Design – Dispatch CLEC • OCI Non-UNE Design – Dispatch CLEC (Region) • OCI Non-UNE Design – Dispatch SQM • OCI Non-UNE Design – Dispatch SQM (Region)	One time occurrence, average is right and the interval is wrong. CLOSED
C0046	05/19/99	Data inconsistent. The UNE Non-Design service type contains no entries under the >30 Days column but the Average Interval is 43.67 Days. April Reports affected: • OCI UNE Dispatch CLEC • OCI UNE Dispatch CLEC (Region) Unable to determine if this miscalculation would affect the following reports: • OCI UNE Dispatch SQM • OCI UNE Dispatch SQM (Region)	One time occurrence, average is right and the interval is wrong. CLOSED
C0047	05/19/99	OCI UNE Dispatch SQM (Region) April Data inconsistent. For the AT&T OCN 7421 Residence Non-Dispatch the numbers do not match. The Hours are listed as 429,748, the Count is listed as 33 and, the Avg.Dur	One time occurrence. BST acknowledged mistake. CLOSED

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		is listed as 13.42963. The third number cannot be generated from the other two (a/b#c, c*b#a ...).	
C0048	05/19/99	April Missed Repair Appointments CLEC R&B Region contains incorrect data. This report mirrors April Maintenance Average Duration CLEC (R&B) Region.	One time occurrence. CLOSED
C0049	05/19/99	SQM - Out of Service > 24 Hrs (April) error message received. Error Message: Error Executing Job With DSS Server. Please Notify Administrator [Oracle] [ODBC Oracle Driver] [Oracle OCI] ORA - 00904 invalid Column Name	One time occurrence. CLOSED
C0050	05/19/99	Miscellaneous Aggregate Reports - AGG_Coordinated_Customer_Conversions.txt (April) error message received. Error Message: Error Occurred While Processing Request. Error Diagnostic Information. An error occurred while attempting to open this file. Windows NT error number 2 occurred.	One time occurrence. CLOSED
C0051	05/19/99	Miscellaneous Aggregate Reports - BST_Prov_Trouble_w_in_30_Days_Design.html (April) error message received. Error Message: You do not have access to this file	One time occurrence. CLOSED
C0052	06/04/99	Percent Reject Requests - Mechanized (Region) for April is missing data. Reject Count Other = 138, LSR Count Other is missing. How can there be rejects without an LSR?	June 4, 1999 - sent e-mail to BellSouth BST claims that all of the rejects are fatal rejects. CLOSED
C0053	06/11/99	Report names not retained after downloading.	June 11, 1999 - e-mail sent. BST stated that PMAP does not have the ability to save the title of files exported from PMAP. CLOSED
C0054	06/29/99	Data inconsistent. The May Percent Reject Service Request Fully Mechanized CLEC report contains 58 rejects and only 6 LSRs for the Region - AT&T - 7421 - Other category.	June 29, 1999 - met with BellSouth. July 1, 1999 - e-mailed BellSouth. BST said that the rejects are fatal rejects. CLOSED
C0055	06/29/99	Data inconsistent. The May Percent Reject Service Request Total Mechanized CLEC report contains 58 rejects and only 6 LSRs for the Region - AT&T - 7421 - Other category. In addition the State - AT&T - 7421 - Other category of the similar state report contains no information in the reject count field but, has 6 LSRs.	June 29, 1999 - BST stated that only the region report shows fatal rejects, the state report shows rejects but not fatal rejects. CLOSED
C0056	06/19/99	State and region May files were swapped for:	One time occurrence. BST acknowledged mistake.

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		- Percent Reject Service Request Partially Mechanized CLEC - Percent Reject Service Request Partially Mechanized CLEC (Region) - Percent Reject Service Request Partially Mechanized SQM - Percent Reject Service Request Partially Mechanized SQM (Region)	CLOSED
C0057	06/19/99	The category CLEC - Region - Other in the file Percent Reject Service Request Total Mechanized SQM lists a percent equal to 3000%.	BST said that the rejects are fatal rejects, no LSR needed. CLOSED
C0058	06/19/99	The phrase <i>No Data Returned For This Report</i> was received when attempting to download these May reports: - FOC Timeliness Trunks CLEC - Order Completion Interval Non-UNE Design - Dispatch CLEC - Order Completion Interval Non-UNE Design - Non-Dispatch CLEC - Order Completion Interval POTS - Dispatch CLEC	BST now generates blank reports instead of displaying this message. CLOSED
C0059	06/19/99	The File FOC Timeliness Fully Mechanized CLEC expresses the average interval in hours but, the file FOC Timeliness Fully Mechanized SQM expresses the average interval in days.	One time occurrence. CLOSED
C0060	06/19/99	The performance results for these categories: - BST - Region -Design - BST - Region -Local Interconnection Trunks - CLEC - Region -Design - CLEC - Region -UNE Design - CLEC - Region -Local Interconnection Trunks are identical in these files for April and May: - Missed Repair Appointments CLEC - Out of Service > 24 Hours CLEC	BellSouth Resolved. CLOSED
C0061	06/19/99	The category Region - TCG - 7125 - Business, in the file Customer Trouble Report Rate CLEC has a Trouble Count equal to 1 but the Line Count is missing.	BellSouth Resolved CLOSED
C0062	06/19/99	The performance results for these categories: - Region -TCG - 7125 - Business - Region -TCG - 7125 - UNE Non-Design - Region -TCG - 7125 - UNE Design - Region -TPM - Local Interconnection Trunks are identical in these files for April and May: - Missed Repair Appointments SQM - Out of Service > 24 Hours SQM	BellSouth Resolved CLOSED
C0063	06/19/99	The following performance reports are missing for April and May: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	BellSouth did not have data for any of the reports except Percent Provisioning Troubles Within 30 Days.

CLOSED BELL SOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS
		- Percent Provisioning Troubles Within 30 Days - Coordinated Customer Conversions - Average Completion Notice Interval	BellSouth provided the report to AT&T. CLOSED
C0064	06/23/99	Raw Data files for May were late appearing on PMAP.	July 7, 1999 - email sent July 12, 1999 - e-mail received BST stated that the raw data would be delayed at least ten days from the time the reports are released. CLOSED
C0065	07/01/99	What is the process for BellSouth to notify AT&T of changes to PMAP or the files listed on PMAP?	July 1, 1999 - e-mail sent. July 1, 1999 - e-mail response received CLOSED
C0072	08/23/99	The following July files do not contain any measures of UNE Loop with NP. - Held Order Intvl & Mean CLEC - Held Order Intvl & Mean CLEC (Region) - Held Order Intvl & Mean SQM - Held Order Intvl & Mean SQM (Region) - OCI UNE Non-Dispatch CLEC - OCI UNE Non-Dispatch CLEC (Region) - OCI UNE Dispatch CLEC - OCI UNE Dispatch CLEC (Region) %Missed Installation Appmts CLEC %Missed Installation Appmts CLEC (Reg) - OCI UNE Non-Dispatch SQM - OCI UNE Non-Dispatch SQM (Region) - OCI UNE Dispatch - OCI UNE Dispatch SQM (Region) %Missed Installation Appmts SQM %Missed Installation Appmts SQM (Reg)	August 23, 1999 - Sent letter to BellSouth stating problems encountered. September 10, 1999 - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated. September 17, 1999 - Letter received from BellSouth. BST is creating a new series of reports with NP for the PMAP. These reports are set for release in early fourth quarter '99, no NP reports will be generated until then. September 28, 1999 - Met with BST. Does BST have a firm implementation date? Brian will investigate implementation date. Does BST plan to report on back dated months in the new report format? Jim requested reporting back to July, 1999 using the new measurement. Brian will make this request internally. December 15, 1999 - November data contained separate files with the UNE LNP data. BST will not provide old data. CLOSED
C0076	08/23/99	The July Held Order Intvl & % Jeopardy CLEC MSA report refuses to download from the PMAP website. The July Avg. Completion Notice Interval CLEC MSA report gives an error when attempting to download from the PMAP website.	August 23, 1999 - Sent letter to BellSouth stating problems encountered. September 10, 1999 - Letter received from BellSouth acknowledging letter sent on 8/23 and stating that a response will be generated. September 17, 1999 - Letter received from BellSouth, no mention of the issue. CLOSED

CLOSED BELLSOUTH WEB SITE ISSUES

CONTROL NUMBER	DATE OPENED	ISSUE DESCRIPTION	STATUS

CERTIFICATE OF SERVICE - Docket No. 8354-U

This is to certify that a copy of **"AT&T's Comments on Georgia Third Party Test Developments"** 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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