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333 Commerce Street
Nashville, Tennessee 37201-3300

Guy M. Hicks
General Counsel

April 4, 2000

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").

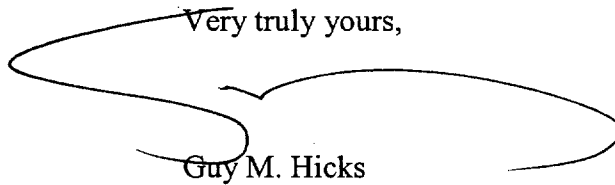| Date Filed	Description of Document(s)
February 17, 2000	BellSouth's amended response to Exception 2
February 17, 2000	KPMG's Exception 15 along with BellSouth's Response
February 25, 2000	KPMG's Closure Reports for Exceptions 3, 5, and 8
February 25, 2000	KPMG's Exceptions 16, 17, 18, 19, 20, 21, and 22 with BellSouth's responses
March 2, 2000	BellSouth's OSS Evaluation – Georgia Supplemental Test Plan Version 1.1
March 3, 2000	KPMG's Interim Status report
March 9, 2000	BellSouth's Amended Responses to KPMG Exceptions 10, 11 and 14
March 9, 2000	KPMG Exceptions 27, 28, and 29 with BellSouth's responses

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David Waddell, Executive Secretary
April 4, 2000
Page 2

Date Filed	Description of Document(s)
March 23, 2000	AT&T's Comments re Third Party Testing

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 April 4, 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:

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February 17, 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**
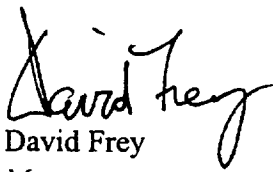
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's amended response to Exception 2 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

@ BELLSOUTH

February 11, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Change Management
Practices Review (CM-1).

Exception:

**BellSouth's change management process does not include clearly defined and reasonable
intervals for notifying customers about changes to electronic interfaces and supporting
documentation.**

Based on interview sessions and documentation reviews conducted as part of the CM-1 Test,
KPMG has observed that BellSouth's processes for introducing changes to electronic interfaces,
business rules, and technical specifications do not include fully defined and published change
management processes and intervals for items that affect Competitive Local Exchange Carriers
(CLECs). BellSouth's published change management process should define intervals for both
BellSouth- and CLEC-initiated changes, including changes that stem from both system
enhancements (features) and corrections of defects.

Key elements of a comprehensive change management process include:

A. Multi-dimensional classification system for changes.
B. Type (source)
C. Severity
D. Event category (interface, documentation, procedures)
E. Defined intervals for all classifications.
F. Opportunity for CLEC testing of changes.

Under current methods and procedures, documentation reflecting new interface fields, field
formats, and business rules or procedures can be introduced and made effective the day of
release. In September and October 1999, multiple on-line CLEC customer guide updates were
released. In each case listed below, the notification interval was inadequate to allow CLECs to
assess the operational impact of the change and make corresponding adjustments.

Document Title	Posting Date	Notification Date	Notification Interval
BellSouth Guide to Interconnection Issue 8E	September 22, 1999	None	0 days
LEO Implementation Guide (Volume 1), Issue 7K	November 1, 1999[1]	None	4 days
LEO Implementation Guide (Volume 4), Issue 7F	October 28, 1999	None	0 days
Local Exchange Navigation System (LENS) User Guide, Issue 7B	September 9, 1999	None	0 days
Collocation Handbook, Issue 8	September 16, 1999	None	0 days
Local Number Portability Ordering Guide for CLECs, Issue 1B	October 27, 1999	None	0 days
Telecommunications Access Gateway (TAG), Release 2.2.0.5	October 30, 1999	October 28, 1999	2 days

Impact:

In the absence of a comprehensive change management process that includes defined intervals for change events, BellSouth's current practices could adversely affect CLEC business operations.

Examples of how CLEC operations could be affected include:

A. Workforce management disruptions resulting from emergency allocation of CLEC personnel to address a required change(s) immediately.
B. Order entry errors resulting from an inability to appropriately train CLEC order entry personnel in advance of a change. An increased frequency of errors results in higher order fallout rates that can lengthen the total intervals for service installations.
C. Reduction in customer satisfaction due to an inability to quickly process order types affected by a change event.

BellSouth Response

BellSouth will recommend during the next Electronic Interface Change Control Process, EICCP, workshop scheduled for 2/16-2/17 that the EICCP scope be expanded to include the following:

- BellSouth- and CLEC-initiated Defect Change Requests, both documentation and software that are CLEC-affecting
- BellSouth-initiated enhancement requests that are CLEC-affecting. (CLEC-initiated enhancements are already included as a component of the existing process).
- Oversight of BellSouth's Escalation and Defect Notification processes

---

[1] In the case of LEO Implementation Guide, Volume 1, Issue 7K, although the Web site's stated posting date reflects October 27, 1999, the document was actually available there on November 1, 1999. A CLEC would, therefore, have realized an actual notification interval of four days.

- Formalized Escalation and Defect Notification processes, as well as define how the new processes will be incorporated into the existing EICCP structure.
-

A follow-up conference call is scheduled for February 29th to answer questions raised in the workshop. We do not have firm dates when the above items will be implemented but will operate within the framework of the current EICCP process which requires approval from the steering committee, comprised of BellSouth and CLEC representatives, prior to adopting changes.

BellSouth is also in the process of completing the following:

- Posting a notification letter by 2/18/00 advising CLECs of our intervals for providing advance notice of planned software and documentation changes.
- Developing a website by 3/1/00 where we will post unplanned system outages.

<u>CERTIFICATE OF SERVICE</u>
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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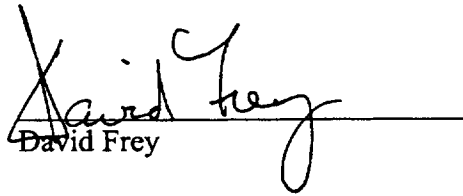4000 Highlands Parkway
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This 17th day of February 2000.

David Frey

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February 17, 2000

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FEB 1 7 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 Consulting LLC's Exception 15 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

Date: February 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Normal and Peak Volume Tests (M&R-3 & M&R-4). This exception is described below.

Exception:

Under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.

BellSouth's ECTA Gateway is designed to allow CLECs to enter trouble tickets into either one of two BellSouth OSS M&R systems, LMOS (for POTS) and WFA (for specials). During the course of volume testing, KPMG discovered that some attempts to create trouble tickets produced an ECTA error message with the codes "source=4" and "reason=770". This error occurred in 10 out of 740 total attempted creates (1.4%). Investigation of this error with representatives of BellSouth Applied Technologies revealed that this error occurs when LMOS assigns a trouble ticket identification number that already exists in the ECTA Gateway's database of trouble ticket identification numbers.

When this error occurs, a trouble ticket is actually created in LMOS but the CLEC is unable to view information in the trouble ticket, modify or cancel the trouble ticket, or receive status updates using the ECTA Gateway. This trouble report is not recorded in, or accessible through, ECTA, and the CLEC is not able to track the trouble ticket through any electronic means.

Impact

In order to track a trouble ticket generated under the scenarios described above, a CLEC must call BellSouth to have the ticket canceled and then resubmit the ticket through ECTA. Such a requirement leads to increased operating costs associated with trouble ticket processing.

ⓐ *BELL*SOUTH

February 8, 2000

EXCEPTION REPORT

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Exception:

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Impact

In order to track a trouble ticket generated under the scenarios described above, a CLEC must call BellSouth to have the ticket canceled and then resubmit the ticket through ECTA. Such a requirement leads to increased operating costs associated with trouble ticket processing.

BellSouth Response

Initially the ECTA active database retained trouble ticket transaction information for 30 days. (Part of the daily system maintenance routine is to purge 'closed' trouble report data for all tickets that have been closed for 30 days.) Once the Manager receives the

"close" AVC there is no practical reason for ECTA to retain this information (log files provide usage data, etc.).

LMOS assigns Trouble Ticket numbers using a complex algorithm and only a subset of the available numbers are used in an LMOS region (i.e. approximately 160,000 unique numbers). When a given trouble ticket is closed in LMOS, LMOS knows that the given trouble ticket number is now available for reuse. (Note: due to the methodology LMOS uses to assign TTNs, it is possible for an old report to be closed one day and that TTN assigned to a new report on the same day.)

To minimize the probability that a newly created LMOS trouble report will have the same TTN as an old report stored in the ECTA database, *the ECTA purge interval has been reduced to 2 days.* Note: if the Manager has problems and they did not receive all the AVC transactions, they can 'get' the missing data directly from the ECTA database as part of their recovery process. If this data is purged daily (which would increase the probability of not getting conflicting TTNs), and a Manager could not find missing data (because they had problems), they would be calling the BRMC for update information (generating unnecessary work for the Center). The two-day purge window provides sufficient time for the Manager to recover from any problems while significantly reducing the probability of obtaining TTN conflicts. (Note: this purge parameter is an adjustable figure (by Manager) and could be changed to one day if needed with minimal effort.)

<u>CERTIFICATE OF SERVICE</u>
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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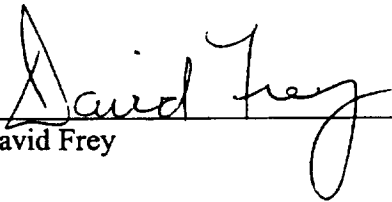4000 Highlands Parkway
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February 25, 2000

Ms. Helen O'Leary
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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 Consulting LLC's Closure Reports for Exceptions 3, 5 and 8 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

Date: February 10, 2000

EXCEPTION CLOSURE REPORT

Exception:

Competitive Local Exchange Carriers (CLECs) are not notified when BellSouth initiates changes to published historical performance measurement reports and/or the raw data files associated with these reports after this information has been removed from the Performance Measurement and Analysis Platform (PMAP) web-site.

Summary of Exception:

KPMG identified Exception 3 through performance measurement testing activities associated with the validation of Service Quality Measurement (SQM) calculations.

BellSouth makes its monthly performance measurement reports and related information available to the CLECs primarily through the PMAP web-site. KPMG observed that in cases where BellSouth initiates changes to the performance measurement reports and/or raw data after this information has been removed from the PMAP web site, CLECs are not notified, including CLECs affected by the reporting change.

If CLECs are not informed of changes in the reports, they will not have the information needed to accurately monitor BellSouth's service quality performance.

Summary of BellSouth Response:

BellSouth addressed KPMG's observations in Exception 3. BellSouth's response stated:

1. BellSouth has enhanced its CLEC Notification Procedure to include reports that change from previous months. The information regarding which monthly reports are affected and instructions on how to obtain modified reports are being included on the PMAP web-site.
2. The *PMAP User Guide* has been modified to describe the enhanced Notification Procedure, outline the changes made to accommodate this improvement in its process, and instruct CLECs to obtain modified reports.

Summary of KPMG Re-Test Activities:

KPMG reviewed BellSouth's proposed CLEC Notification Procedure to determine if the

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policies addressed the concerns raised by Exception 3. KPMG also reviewed the documentation in the *PMAP User Guide* to determine if the CLECs were adequately informed of the enhancements and instructed on how to obtain modified reports.

KPMG Re-Test Results:

BellSouth has implemented the following changes to enhance its CLEC notification process:

1. A new location on the PMAP web-site has been created where notification about updates on historical SQM reports will be provided.
2. The new *PMAP User Guide, Version 2.0.4*, dated 12/15/99, has been modified to include a new section providing instructions as to how to obtain updated reports. The new *PMAP User Guide* has been posted to the PMAP web-site.
3. BellSouth has provided proposed changes to the PMAP User Guide to KPMG. These changes specify that BellSouth will respond to all CLEC requests for changed reports within 48 hours, providing either the revised report or an estimated delivery date, based upon the complexity of the request. This new language will appear in the next update of the *PMAP User Guide*.

BellSouth's CLEC notification process has improved significantly since the December implementation of measures to address KPMG's Exception 3. BellSouth now has published processes and procedures in place to notify the CLEC community of changes in past SQM reports.

The Georgia Public Service Commission (GA-PSC) may wish to continue to monitor change notification to verify BellSouth's continued compliance. The GA-PSC may also wish to monitor BellSouth's CLEC notification process during an actual occurrence of change in past SQM report(s).

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 3 closed.

Attachments: None.

~TRE3F30.DOC

Date: February 10, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's rules for submitting supplements to existing service orders are not accurately defined.

Summary of Exception:

A supplement is defined as a new version of an existing service order. CLECs issue supplements to service requests under several circumstances:

- To cancel a pending service order.
- To request a new desired due date.
- To change other aspects of an existing service order (e.g., to correct errors, to reflect changes in an end user's service request).

KPMG has received multiple errors as a result of supplemental service orders submitted via BellSouth's TAG and EDI interfaces. Investigation of these error messages indicated that two specific fields could not be changed when issuing a supplemental order. The following fields create hard errors due to inability to change the field entry on a supplemental order:

1. Company Code (CC)
2. Local Billing Account Number (LOCBAN)

Summary of BellSouth Response:

BellSouth's response to Exception 5 addressed the elements noted in the exception. BellSouth's response stated:

1. The *Local Exchange Ordering Implementation Guide* (LEO Guide) will be updated to define fields that cannot be changed via a Supplement. The date for posting to the web is January 31, 2000.

Summary of KPMG Re-test Activities:

Subsequent to the document's posting on January 31, 2000, KPMG reviewed *LEO Guide, Version N*, which included Note 5:

"The following fields can not be changed when issuing a SUP: CC, SC, PON, REQTYP, ACT, LOCBAN, EAN and EATN. In addition, when the NPT field = A, B, or C, it can not be changed to D and when the NPT field = D, it cannot be changed to A, B, or C."

KPMG Re-test Results:

BellSouth's *LEO Guide, Version N* has been updated to reflect that the "CC" and "LOCBAN" fields cannot be changed when issuing a supplemental order.

BellSouth's content improvement to *LEO Guide, Version N* substantially assists the CLECs in successfully submitting supplemental orders.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 5 closed.

Attachments: None.

Date: February 10, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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) status[1] is issued on a service order and the CLEC is notified of the service order's changed status[2].

Summary of BellSouth 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.

Summary of KPMG Re-test Activities:

KPMG spoke with representatives from BellSouth's Local Carrier Service Center (LCSC) and Address Facilities Inventory Group (AFIG) to verify BellSouth's process for

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[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."

handling retail customer jeopardy conditions. KPMG learned that both retail customers and CLECs receive similar treatment. While receipt of an FOC prior to determining facility status presents operational problems for a CLEC, BellSouth retail customers are not accorded preferential treatment.

KPMG Re-test Results:

Based on re-test activities, KPMG has determined that parity exists between BellSouth's retail and CLEC customers with regard to the issuance of an FOC prior to facility status confirmation.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 8 closed.

Attachments: None.

<u>CERTIFICATE OF SERVICE</u>
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 25th day of February 2000.

David Frey

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(404) 222-3000

KPMG

303 Peachtree Street, N.E.
Suite 2000
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Telephone 404 222 3000
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February 25, 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 Consulting LLC's Exceptions 16, 17, 18, 19, 20, 21 and 22 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 KPMG LLP KPMG LLP a U.S. limited liability partnership, is
a member of KPMG International, a Swiss association.

Date: February 10, 2000

FEB 2 5 2000

EXCEPTION REPORT

EXECUTIVE SECRETARY
G.P.S.C.

The following exception has been identified as a result of the CRIS/CABS Functional Test (BLG-1).

Exception:

BellSouth issued multiple bills containing erroneous information to the KPMG CLEC.

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to the KPMG CLEC. Multiple bills received by the KPMG CLEC contain erroneous information, such as: 1) Undocumented charges; 2) Incorrect Rates; 3) Mislabeled information.

Undocumented Charges

USOC VE1R2: During the months of October 1999 through December 1999, BellSouth billed the KPMG CLEC $0.25 each month for a UNE service component identified by the Universal Service Order Code (USOC) VE1R2 (Virtual Expanded Interconnection). USOC VE1R2 is not defined in applicable BellSouth tariffs or in rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement.

Upon inquiry, BellSouth informed KPMG that the USOC VE1R2 was added to the BellSouth rate tables in 1997 and is applicable to all CLECs. The monthly-recurring rate established for this USOC is $0.30. BellSouth applied a business discount of 17.3%, resulting in a monthly-recurring charge of $0.25.

Representative occurrences of this charge are found on the following invoices:

Telephone Number	Account Number	Invoice Date
912-744-0966	706 Q97 9808 808	12/17/99
912-744-2438	706 Q97 9808 808	12/17/99
706-722-4087	706 Q85 8252 252	10/5/99
706-722-4181	706 Q85 8252 252	10/5/99
706-722-5472	706 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	12/5/99
706-722-9523	706 Q85 8252 252	12/5/99
770-933-8597	770 Q85 8252 252	10/5/99
770-933-9532	770 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	11/5/99
706-722-9523	706 Q85 8252 252	11/5/99

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USOC SOMEC: The USOC SOMEC (a charge assessed for mechanized CLEC service order requests) was incorrectly applied for non-CABS orders. The existence of this USOC and its associated monthly charge is not documented in the BellSouth tariffs. The rate spreadsheet created for the KPMG CLEC in lieu of an Interconnection Agreement lists the charge for the USOC SOMEC as a one-time charge of $5.00 for CABS orders; no such charge appears for non-CABS orders.

Representative occurrences of errors are detailed on the following invoices:

Q-Account	Earning TN	Invoice Date
706 Q85-4226 226	912U480010	10/17/99
706 Q85-4226 226	706U579269	10/17/99

USOC UEAC2[1]: BellSouth billed the KPMG CLEC for the monthly recurring charge and non-recurring charge for the USOC UEAC2 (2-Wire Cross-Connect for Provisioning) at a rate of $0.00. The non-recurring and monthly recurring rate assessed by BellSouth for the USOC UEAC2 for SL1 loops is not listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement. In addition, this USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this charge can be found on the following invoices:

Q-Account	Circuit ID	Invoice Date
706 Q85-4226 226	40.TYNU.526413	10/17/99
706 Q85-4226 226	40.TYNU.526414	10/17/99

Incorrect Rates

USOC UEAL2[2]: BellSouth billed the KPMG CLEC a $0.00 monthly recurring charge for the USOC UEAL2. The USOC UEAL2 is listed in the rate spreadsheet as a monthly recurring charge of $19.57 for SL2 Loops and $16.51 for SL1 Loops. This USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this error are detailed below.

Q-Account	Circuit ID	Invoice Date
706 Q85-4226 226	50.TYNU.500910	10/17/99
706 Q85-4226 226	50.TYNU.500911	10/17/99
706 Q85-4226 226	50.TYNU.501081	01/17/00

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[1] These errors had no net monetary effect on the KPMG CLEC bills.

[2] These errors resulted in an under-charge to the KPMG CLEC.

~TRE1501.DOC

706 Q85-4226 226   50.TYNU.500896   01/17/00

Mislabeled Information

Mislabeling in Detail of Adjustments Applied: The KPMG CLEC submitted several Billing Adjustment Investigation Requests to BellSouth. KPMG requested adjustments of $17.16 for USOC UEPBL and for $12.60 for USOC VE1R2. A third adjustment was requested for $125.00 for an overpayment on the account. These adjustment requests were processed and the credits were applied on the 12/17/99 invoice of Billing Account Number 770-Q97-9808-808. The three adjustments requested were aggregated and labeled as "Credit for Service Disconnected." Although BellSouth documentation does not address specifics regarding adjustment details, aggregating adjustments denies a CLEC the ability to validate specific adjustments credited against those requested.

Impact

Issuing bills containing erroneous information will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.

- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

~TRE1501.DOC

⊕ *BELL*SOUTH

February 17, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS/CABS Functional Test (BLG-1).

Exception:

BellSouth issued multiple bills containing erroneous information to the KPMG CLEC.

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Representative occurrences of this error are detailed below.

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---

[1] These errors had no net monetary effect on the KPMG CLEC bills.
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Issuing bills containing erroneous information will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.

- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

Undocumented Charges – USOC VE1R2

The standard agreements refer to the applicable tariffs if specific rates are not provided in the contracts. For Virtual Collocation, that tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in that Tariff. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A recurring rate of $0.30 per month was authorized for use when this service was ordered by and provisioned for a customer.

The USOC, VE1R2, was added into the applicable rating tables and was incorrectly set to apply the resale discount. This setting will be removed by 2/23/00 and all occurrences of the discounted rate on CLEC accounts will be revised to reflect this change.

Undocumented Charges – USOC SOMEC

An Interconnection Agreement was not signed with the initial Test Manager. Updates were made in the various billing tables based on the anticipated services that would be

ordered. It was decided not to include the USOC SOMEC on the CRIS tables because that USOC was already loaded with statewide rates from the Standard Interconnection Agreement (non-recurring charge of $3.50).

For CABS, no such statewide rate was available so it was determined that a specific rate would be included. Absent any specific agreement, a rate of $5.00 was used.

Undocumented Charges – USOC UEAC2

Absent an Interconnection Agreement, when setting up rates for this test updates were made in the various billing tables based on the anticipated services that would be ordered. This USOC was not foreseen as an item that would appear on orders during the test. As such, the rate defaulted to zero. This USOC is listed in the Standard Interconnection Agreement.

Incorrect Rates – USOC UEAL2

The USOC, UEAL2, was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC will be added to the CRIS rate file for business classes of service by 2/23/00. This will correct the rates on a going forward basis. Further analysis will be completed to determine when all occurrences of the USOC of CLEC accounts will be revised to reflect this charge.

Mislabeled Information

The adjustments requested were labeled as credits for disconnected service due to an error in mapping these types of transactions to the OBF "J" bill phrases. The labels will be changed to match the phrases used for processing adjustments for retail customers by 04/19/00.

The aggregation of adjustments seen on the "J" bills is identical to the manner in which these types of transactions are aggregated in the billing systems for retail customers. As such, parity is provided and no changes are required.

Date: February 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Change Management Practices Review (CM-1).

Exception:

BellSouth's change management process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site allows for defects in postings.

As a result of evaluation interviews with BellSouth personnel, KPMG has noted the absence of an effective process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site.

The following list includes descriptions of inaccurate postings to, or omissions from, the BellSouth Interconnection Services' Web site, resulting from an ineffective change management process. These error types create confusion among the CLECs, which depend on this information to effectively transact business with BellSouth. In each case, a description of an error identified by KPMG is provided, along with the date of the posting.

1. **12/10/99** - Selecting *TAG Programmer's Job Aid – Version 5, September 1999* link actually produced the document *TAG Programmer's Job Aid – Version 5.1, September 1999*.

2. **12/15/99** - The *TAG Programmer's Job Aid – Version 5, July 1999* (an older version) appeared with no Carrier Notification.

3. **12/15/99** - Both the *TAG API Reference Guide 2.2.0.5* and *TAG Programmer's Job Aid – Version 5, September 1999* were removed with no Carrier Notification.

4. **1/17/00** - The *TAG API Reference Guide 3.0.1.x* and *TAG Programmer's Job Aid – Version 6.0, January 15, 2000* appeared with no Carrier Notification.

5. **1/17/00** - The *TAG Programmer's Job Aid – Version 5, July 1999* was removed with no Carrier Notification.

6. **1/18/00** - Carrier Notification SN91081631 was posted describing the release of TAG Release 2.2.0.6. Neither this nor another Carrier Notification announced the posting of the associated technical specification documentation that was provided to coincide with the update of this interface.

7. **1/21/00** - The *TAG API Reference Guide 2.2.0.5* reappeared (ref. item #3 above) with no Carrier Notification.

Impact

An ineffective change management process for updating the Interconnection Services Local Exchange Carriers - OSS Information Center Web site will negatively impact CLECs by causing:

1. Emergency allocations of resources to address required systems or procedural changes immediately.

2. Additional resource, time, and cost expenditures to examine the Web site regularly for unannounced changes in systems and supporting documentation.

Each of these issues leads to increases in CLEC operating costs.

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⊕ BELLSOUTH

February 16, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Change Management Practices Review (CM-1).

Exception:

BellSouth's change management process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site allows for defects in postings.

As a result of evaluation interviews with BellSouth personnel, KPMG has noted the absence of an effective process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site.

The following list includes descriptions of inaccurate postings to, or omissions from, the BellSouth Interconnection Services' Web site, resulting from an ineffective change management process. These error types create confusion among the CLECs, which depend on this information to effectively transact business with BellSouth. In each case, a description of an error identified by KPMG is provided, along with the date of the posting.

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1. Emergency allocations of resources to address required systems or procedural changes immediately.

2. Additional resource, time, and cost expenditures to examine the Web site regularly for unannounced changes in systems and supporting documentation.

Each of these issues leads to increases in CLEC operating costs.

BellSouth Response

BellSouth agrees that Carrier Notification was not provided when some documents were changed or removed from the Interconnection website. Effective with TAG Release 2.2.0.7, which is scheduled for implementation March 11, 2000, we will specifically reference documents, e.g. TAG API Reference Guide and TAG Programmer's Job Aid, impacted by the software upgrade.

Some documents were inadvertently deleted when the Interconnection website was redesigned. We are in the process of recovering deleted documents to re-post on the site. The TAG Programmer's Job Aid, V5.1 is one of the documents removed in error and was re-posted 2/8/00.

The link problem referenced in item 1 was human error. We have several check points in our current process for ensuring the accuracy of documents. The last check is by the document owner to ensure the format and content are correct. If problems are found, errors are corrected immediately. In the above instance, the final check may have been overlooked. We are in the process of reeducating all document owners on the process to prevent future link problems.

Date: February 15, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional and Documentation Tests (O&P-1, O&P-2, O&P-8, and O&P-9).

Exception

BellSouth (BLS) requirements for values entered in the Line Class of Service data element for EDI and TAG orders are not consistent, and the documentation is incomplete.

The Line Class of Service (LNECLS SVC) data element is a required input on service requests for UNE Port and UNE Loop-Port Combination migrations and new installations. According to BLS ordering guidelines, this field identifies the class of service at the customer's line level (i.e., measured or flat rate)[1].

BLS business rule documentation (*LEO Guide, Volume 1*) does not clearly specify the valid entries for the LNECLS SVC data element and provides no reference to other documentation for locating valid entries. During testing, KPMG submitted UNE Port and UNE Combo service requests via TAG and EDI populating the LNECLS SVC field with one of the following entries, found in other BLS documentation[2]:

- **UEPRX**: Basic class of service, Port – residence.
- **UEPRL**: 2-wire residence port service – measured.
- **UEPBX**: Basic class of service, Port – business.
- **UEPBL**: 2-wire business port service – measured.

These transactions received varying responses from BLS ordering systems. Response types can be placed into three categories[3]:

Category 1: UEPRX/UEPBX in LNECLS SVC field (Order received FOC). These service requests contained the residence or business Basic class of service indicator in the LNECLS SVC field. Each of these orders received a Firm Order Confirmation (FOC).

Category 2: UEPRX/UEPBX in LNECLS SVC field (Order received CLR). These service requests were formatted similarly to those in Category 1, with the residence or business Basic class of service indicator in the LNECLS SVC field. These orders

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[1] *BellSouth Local Exchange Ordering Guide – Volume 1, Issue 7N*, January 2000, Section 11.3.30.

[2] *BellSouth Local Exchange Ordering Guide – Volume 3, Issue 3a*, August 1998, Section 3.5.

[3] In compiling this information, KPMG verified that all other data elements in each of these orders was correctly populated.

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received Clarifications (CLRs). A number of these service requests were re-submitted with the 2-wire measured port indicator (UEPBL/UEPRL) and received FOCs[4].

Category 3: UEPRL/UEPBL in LNECLS SVC field (Order received FOC). These service requests contained the residence or business 2-wire measured Port indicator in the LNECLS SVC field. Each of these orders received a FOC.

The following tables present a sample of KPMG service requests falling into each of the three categories.

CATEGORY 1

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
428A124PTJ100002 (CC = 9991)	MV	VER 01	UEPRX	FOC	12/7/99
428A224PTJ100002 (CC = 9991)	MV	VER 01	UEPRX	FOC	12/7/99
441A214PTJ000002 (CC = 9991)	MRS	VER 00	UEPBX	FOC	12/13/99
428A124PTJ100006 (CC = 9994)	MV	VER 01	UEPRX	FOC	12/20/99
625A214PTJ100001 (CC = 9991)	MC	VER 05	UEPBX	FOC	12/22/99
417X223PTM000002 (CC = 9991)	FRS	VER 00	UEPRX	FOC	1/12/00
419F223PTM101002 (CC = 9991)	FD	VER 03	UEPRX	FOC	1/18/00

CATEGORY 2

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
650A224PTJ000001 (CC = 9994)	MV	VER 00	UEPRX	CLR – Error Code 9755 "Missing USOCS (UEPRL, UEPLX, etc.) Please add and resubmit."	1/11/00
		VER 02	UEPRL	CLR – error unrelated to Line Class of Service field	1/26/00
428A124PTJ100008 (CC=9994) VER 00	MV	VER 00	UEPRX	CLR – Error Code 1000 "Missing USOCs (UEPLX, UEPRL, etc). Please correct and resubmit."	1/13/00
		VER 02	UEPRL	FOC	1/19/00

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[4] One service request received an additional clarification not related to LNECLS SVC entry.

625A214PEJ100002 (CC=9991)	MC	VER 00	UEPBX	CLR – No Error Code "Invalid line class of Svc for requested service"	1/17/00
		VER 01	UEPBL	FOC	2/2/00
626A224PEJ100003 (CC=9991)	MC	VER 00	UEPRX	CLR – No Error Code "Invalid line class of Svc for requested service"	1/17/00

CATEGORY 3

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
626A224PTJ100002 (CC = 9991)	MC	VER 04	UEPRL	FOC	12/13/00
626A224PTJ101002 (CC = 9991)	MC	VER 00	UEPRL	FOC	12/30/99
395A213PTM100001 (CC = 9994)	FA	VER 00	UEPBL	FOC	1/18/00
406C213PTM100002 (CC = 9994)	FV	VER 02	UEPBL	FOC	1/18/00

Impact

The absence of complete documentation and consistent BLS responses with respect to values allowed in the LNECLS SVC field could impact CLECs in the following ways:

- **Increase in operating costs.** Without comprehensive documentation specifying valid field entries, a CLEC may be forced to submit multiple service requests to correct errors. Once confirmation responses are received on service requests, a CLEC may duplicate the format of the particular order type in an automated fashion. Identifying the cause of new errors and implementing process fixes (automated or manual) to correct the problem requires additional time, effort and expense.

- **Decrease in Customer Satisfaction.** Re-submission of additional service orders will lead to an overall delay in the provisioning of service to CLEC customers. These delays will likely result in a decrease in CLEC customer satisfaction.

ⓐ *BELLSOUTH*

February 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional and Documentation Tests (O&P-1, O&P-2, O&P-8, and O&P-9).

Exception

BellSouth (BLS) requirements for values entered in the Line Class of Service data element for EDI and TAG orders are not consistent, and the documentation is incomplete.

The Line Class of Service (LNECLS SVC) data element is a required input on service requests for UNE Port and UNE Loop-Port Combination migrations and new installations. According to BLS ordering guidelines, this field identifies the class of service at the customer's line level (i.e., measured or flat rate)[1].

BLS business rule documentation (*LEO Guide, Volume 1*) does not clearly specify the valid entries for the LNECLS SVC data element and provides no reference to other documentation for locating valid entries. During testing, KPMG submitted UNE Port and UNE Combo service requests via TAG and EDI populating the LNECLS SVC field with one of the following entries, found in other BLS documentation[2]:

- **UEPRX**: Basic class of service, Port – residence.
- **UEPRL**: 2-wire residence port service – measured.
- **UEPBX**: Basic class of service, Port – business.
- **UEPBL**: 2-wire business port service – measured.

These transactions received varying responses from BLS ordering systems. Response types can be placed into three categories[3]:

Category 1: UEPRX/UEPBX in LNECLS SVC field (Order received FOC). These service requests contained the residence or business Basic class of service indicator in the LNECLS SVC field. Each of these orders received a Firm Order Confirmation (FOC).

Category 2: UEPRX/UEPBX in LNECLS SVC field (Order received CLR). These service requests were formatted similarly to those in Category 1, with the residence or business Basic class of service indicator in the LNECLS SVC field. These orders

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[1] *BellSouth Local Exchange Ordering Guide – Volume 1, Issue 7N*, January 2000, Section 11.3.30.
[2] *BellSouth Local Exchange Ordering Guide – Volume 3, Issue 3a*, August 1998, Section 3.5.
[3] In compiling this information, KPMG verified that all other data elements in each of these orders were correctly populated.

received Clarifications (CLRs). A number of these service requests were re-submitted with the 2-wire measured port indicator (UEPBL/UEPRL) and received FOCs[4].

Category 3: UEPRL/UEPBL in LNECLS SVC field (Order received FOC). These service requests contained the residence or business 2-wire measured Port indicator in the LNECLS SVC field. Each of these orders received a FOC.

The following tables present a sample of KPMG service requests falling into each of the three categories.

CATEGORY 1

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
428A124PTJ100002 (CC = 9991)	MV	VER 01	UEPRX	FOC	12/7/99
428A224PTJ100002 (CC = 9991)	MV	VER 01	UEPRX	FOC	12/7/99
441A214PTJ000002 (CC = 9991)	MRS	VER 00	UEPBX	FOC	12/13/99
428A124PTJ100006 (CC = 9994)	MV	VER 01	UEPRX	FOC	12/20/99
625A214PTJ100001 (CC = 9991)	MC	VER 05	UEPBX	FOC	12/22/99
417X223PTM000002 (CC = 9991)	FRS	VER 00	UEPRX	FOC	1/12/00
419F223PTM101002 (CC = 9991)	FD	VER 03	UEPRX	FOC	1/18/00

CATEGORY 2

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
650A224PTJ000001 (CC = 9994)	MV	VER 00	UEPRX	CLR – Error Code 9755 "Missing USOCS (UEPRL, UEPLX, etc.) Please add and resubmit."	1/11/00
		VER 02	UEPRL	CLR – error unrelated to Line Class of Service field	1/26/00
428A124PTJ100008 (CC=9994) VER 00	MV	VER 00	UEPRX	CLR – Error Code 1000 "Missing USOCs (UEPLX, UEPRL, etc). Please correct and resubmit."	1/13/00
		VER 02	UEPRL	FOC	1/19/00
625A214PEJ100002 (CC=9991)	MC	VER 00	UEPBX	CLR – No Error Code "Invalid line class of Svc for requested service"	1/17/00
		VER 01	UEPBL	FOC	2/2/00

---

[4] One service request received an additional clarification not related to LNECLS SVC entry.

626A224PEJ100003 (CC=9991)	MC	VER 00	UEPRX	CLR – No Error Code "Invalid line class of Svc for requested service"	1/17/00

CATEGORY 3

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
626A224PTJ100002 (CC = 9991)	MC	VER 04	UEPRL	FOC	12/13/00
626A224PTJ101002 (CC = 9991)	MC	VER 00	UEPRL	FOC	12/30/99
395A213PTM100001 (CC = 9994)	FA	VER 00	UEPBL	FOC	1/18/00
406C213PTM100002 (CC = 9994)	FV	VER 02	UEPBL	FOC	1/18/00

Impact

The absence of complete documentation and consistent BLS responses with respect to values allowed in the LNECLS SVC field could impact CLECs in the following ways:

- **Increase in operating costs.** Without comprehensive documentation specifying valid field entries, a CLEC may be forced to submit multiple service requests to correct errors. Once confirmation responses are received on service requests, a CLEC may duplicate the format of the particular order type in an automated fashion. Identifying the cause of new errors and implementing process fixes (automated or manual) to correct the problem requires additional time, effort and expense.

- **Decrease in Customer Satisfaction.** Re-submission of additional service orders will lead to an overall delay in the provisioning of service to CLEC customers. These delays will likely result in a decrease in CLEC customer satisfaction.

BellSouth Response

In the next scheduled update of the LEO IG, Volume 1 Port Form 11.3.30 LNECLS SVC – Line Class Service Valid entries will be added as follows:

Valid Entries: UEPRL = RES
                    UEPBL = BUS
                    UEPPL = PBX
                    UEPRC = RES with Caller ID
                    UEPBC = BUS with Caller ID

Additionally, incorrect or invalid line class of service LSRs, as referenced in Category 2, automatically clarify back to the CLEC, which was the case with the last 2 requests listed above. The first two requests were clarified due to the service either being final or suspended, so further editing was not necessary.

Date: February 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement Review.

Exception:

BellSouth does not adequately document changes in versions of the *BellSouth Service Quality Measurements Performance Reports.*

BellSouth describes the definitions, exclusions, levels of disaggregation, and calculation of performance measurements in the document entitled *BellSouth Service Quality Measurements Performance Report* ("the SQM manual"). BellSouth publishes the SQM manual on a secured web site called the Performance Measurement and Analysis Platform (PMAP) web site.

KPMG observed that when a new version of the SQM manual appears, it does not include a description of changes relative to the previous version. Thus, when BellSouth publishes an updated SQM manual, it is difficult to track changes in the performance measurement processes.

Impact

The Georgia PSC requires BellSouth to provide the CLECs with performance measurements regarding BellSouth's business functions (pre-ordering, ordering, provisioning, maintenance & repair, billing, and others). The SQM manual is the primary document describing how performance is measured. CLECs rely on the SQM manual as a reference document when assessing the quality of service provided by BellSouth. If BellSouth does not provide adequate documentation of changes in the SQM manual, the ability of the CLECs to monitor BellSouth's service quality is impaired.

⊕ *BELLSOUTH*

February 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement Review.

Exception:

BellSouth does not adequately document changes in versions of the *BellSouth Service Quality Measurements Performance Reports.*

BellSouth describes the definitions, exclusions, levels of disaggregation, and calculation of performance measurements in the document entitled *BellSouth Service Quality Measurements Performance Report* ("the SQM manual"). BellSouth publishes the SQM manual on a secured web site called the Performance Measurement and Analysis Platform (PMAP) web site.

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Impact

The Georgia PSC requires BellSouth to provide the CLECs with performance measurements regarding BellSouth's business functions (pre-ordering, ordering, provisioning, maintenance & repair, billing, and others). The SQM manual is the primary document describing how performance is measured. CLECs rely on the SQM manual as a reference document when assessing the quality of service provided by BellSouth. If BellSouth does not provide adequate documentation of changes in the SQM manual, the ability of the CLECs to monitor BellSouth's service quality is impaired.

BellSouth Response

Beginning February 25, 2000, BellSouth will post two versions of the SQM on the web. One unmarked version will be made available, along with a version marked in legislative format which will display the changes. Deleted information will be struck through and added information will be underlined. This will allow those who wish to identify the portions that have been changed. BellSouth also will begin publishing updates to the SQM quarterly on an as needed basis, beginning April 1, 2000.

Date: February 14, 2000

EXCEPTION REPORT

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

Exception:

BellSouth technicians cannot initiate a Verify Repair Completion request.

The ECTA Gateway is designed to allow a BellSouth maintenance center to generate a request to a CLEC to verify that a reported trouble can be closed when either repairs for a designed trouble report have been completed, or testing on a non-designed ticket indicates that no trouble is currently present[1]. During the course of functional testing, KPMG discovered that this feature is not functioning. According to BellSouth representatives, the Work Force Administration (WFA) systems are not properly defined with the authorization scripts for the General Access Customer Advocacy Center (ACAC) to allow them to initiate these authorization requests.

Impact

The Verify Repair Completion function automates the process of requesting and consenting to closure of a trouble ticket. Without this functionality, it is necessary for BellSouth maintenance personnel to contact a CLEC upon supposed completion of repair activities in order to be able to close out a trouble ticket, or to find out from the CLEC that a trouble still exists. Relying on such contact subverts the intention of the electronically-bonded ECTA system to eliminate extraneous forms of communication and contradicts BellSouth's support of this function in compliance with ANSI standards. In addition, inability to use this functionality adds additional requirements on CLECs to communicate and enter information into their ECTA interface or other OSS systems.

---

[1] The BellSouth ECTA Gateway is designed to support the Verify Repair Completion function as outlined in ANSI T1.228. Page 27 of Appendix B in the *Joint Implementation Agreement (JIA) for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service* Version 10/07/98 outlines the use of the closeOutVerification object used to enable this function for designed trouble reports. In addition, BellSouth representatives have reported that this functionality can be exercised on a subset of non-designed trouble reports as well.

~TRE2138.DOC

⊕ *BELLSOUTH*

February 18, 2000

EXCEPTION REPORT

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The Verify Repair Completion function automates the process of requesting and consenting to closure of a trouble ticket. Without this functionality, it is necessary for BellSouth maintenance personnel to contact a CLEC upon supposed completion of repair activities in order to be able to close out a trouble ticket, or to find out from the CLEC that a trouble still exists. Relying on such contact subverts the intention of the electronically-bonded ECTA system to eliminate extraneous forms of communication and contradicts BellSouth's support of this function in compliance with ANSI standards. In addition, inability to use this functionality adds additional requirements on CLECs to communicate and enter information into their ECTA interface or other OSS systems.

BellSouth Response

Authorization scripts were added in WFA to correct this problem in January of 2000.

---

[1] The BellSouth ECTA Gateway is designed to support the Verify Repair Completion function as outlined in ANSI T1.228. Page 27 of Appendix B in the *Joint Implementation Agreement (JIA) for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service* Version 10/07/98 outlines the use of the closeOutVerification object used to enable this function for designed trouble reports. In addition, BellSouth representatives have reported that this functionality can be exercised on a subset of non-designed trouble reports as well.

Date: February 15, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Flow-Through Evaluation.

Exception:

Local Service Requests (LSRs) were improperly categorized for *Percent Flow Through Service Request Reports.*

During KPMG's review of the Percent Flow Through Service Request Reports (flow-through reports) for September, October and November, a number of inaccuracies were observed. These inaccuracies are grouped into two general categories:

SOCS Fall-Out: Approximately 1.39% of LSRs for the period reviewed are classified as successful flow-through, yet also have error codes associated with them[1]. KPMG determined that, during an attempt to format a service order, these orders completed LEO edits successfully, but failed additional edits in SOCS. Depending on the failure type, the service order may be cancelled. In each of these cases, the LSR is routed to the LCSC for review. The LCSC review results in either a request for clarification to the CLEC or correction of the error by a BLS service representative and re-queuing into SOCS. Since manual intervention (or a return of the LSR to the CLEC) was required to complete these orders, these LSRs should not be reported as flow-though.

"Z" Processing Status: Approximately 0.57% of LSRs for the period reviewed were counted as "CLEC-caused fallout," yet did not receive error codes or messages and were not routed to the LCSC for review[2]. In these cases, each LSR received a "Z" processing status. A "Z" processing status is assigned to an LSR when a supplemental order (i.e., a second LSR with a new version of the same PON) is received during processing of the original LSR. LSRs assigned a "Z" processing status are not routed to the LCSC, nor is the CLEC notified as in other cases of "CLEC-caused fallout." Through the normal ordering process, the supplemental order replaces the original LSR as the CLEC's service request. However, the original LSR remains in "Z" processing status and is recorded as "CLEC-caused fallout," even though the CLEC has received the requested service (via the supplemental order) and no review by a BLS representative or notification of the CLEC took place.

---

[1] For the months September 1999 – November 1999, the aggregate total of LSRs in this category was 4,641 out of 334,721 (1.39%).

[2] For the months September 1999 – November 1999, the aggregate total of LSRs in this category was 1,892 out of 334,721 (0.57%).

Impact

Incorrectly categorizing LSRs in the *Percent Flow Through Service Request Reports* will impact CLECs in the following way:

Inaccurate flow-through reporting. By incorrectly categorizing LSRs, BLS is reporting inaccurate flow-through information to the CLECs and the Georgia Public Service Commission. Inaccurate reporting misleads CLECs and the Commission as to the efficiency of order processing and levels of customer service provided by BellSouth.

⊕ *BELLSOUTH*

February 22, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Flow-Through Evaluation.

Exception:

Local Service Requests (LSRs) were improperly categorized for *Percent Flow Through Service Request Reports*.

During KPMG's review of the Percent Flow Through Service Request Reports (flow-through reports) for September, October and November, a number of inaccuracies were observed. These inaccuracies are grouped into two general categories:

SOCS Fall-Out: Approximately 1.39% of LSRs for the period reviewed are classified as successful flow-through, yet also have error codes associated with them[1]. KPMG determined that, during an attempt to format a service order, these orders completed LEO edits successfully, but failed additional edits in SOCS. Depending on the failure type, the service order may be cancelled. In each of these cases, the LSR is routed to the LCSC for review. The LCSC review results in either a request for clarification to the CLEC or correction of the error by a BLS service representative and re-queuing into SOCS. Since manual intervention (or a return of the LSR to the CLEC) was required to complete these orders, these LSRs should not be reported as flow-though.

"Z" Processing Status: Approximately 0.57% of LSRs for the period reviewed were counted as "CLEC-caused fallout," yet did not receive error codes or messages and were not routed to the LCSC for review[2]. In these cases, each LSR received a "Z" processing status. A "Z" processing status is assigned to an LSR when a supplemental order (i.e., a second LSR with a new version of the same PON) is received during processing of the original LSR. LSRs assigned a "Z" processing status are not routed to the LCSC, nor is the CLEC notified as in other cases of "CLEC-caused fallout." Through the normal ordering process, the supplemental order replaces the original LSR as the CLEC's service request. However, the original LSR remains in "Z" processing status and is recorded as "CLEC-caused fallout," even though the CLEC has received the requested service (via the supplemental order) and no review by a BLS representative or notification of the CLEC took place.

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Incorrectly categorizing LSRs in the *Percent Flow Through Service Request Reports* will impact CLECs in the following way:

Inaccurate flow-through reporting. By incorrectly categorizing LSRs, BLS is reporting inaccurate flow-through information to the CLECs and the Georgia Public Service Commission. Inaccurate reporting misleads CLECs and the Commission as to the efficiency of order processing and levels of customer service provided by BellSouth.

BellSouth Response

SOCS Fall-Out

BellSouth implemented a code change to the flow through program which adds a requirement to the way in which flow through is counted. Flow through is currently counted when an LSR enters SOCS electronically and a service order number is assigned. Potentially, if an additional SOER error is on the service order, it will drop out to the LCSC for manual handling even-though a service order number has been assigned and it has been counted as flow through. The code modification will change the point at which an LSR is counted as flow through to when an LSR reached a status for an FOC to be issued. This change will be effective with the report published in March for February data.

"Z" Processing Status

BellSouth implemented a code change in the flow through program on 2/11/00 to remove the LSRs that received a "Z" processing status and were recorded as CLEC caused fallout. The change is reflected in the report published in February for January data. These "Z" status LSRs are now counted as BST caused fallout.

Date: February 15, 2000

EXCEPTION REPORT

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

Exception:

BellSouth disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.

In response to two loop migration[1] local service requests (LSRs), KPMG has received an error message indicating that the "Account is Final".

To process migration LSRs, BellSouth generates two internal service orders:
1. Disconnect Order;
2. New Connect Order.

Two migration service requests that contained errors were submitted via TAG. As a result of the errors in the LSRs, each dropped out for manual handling by BellSouth Local Carrier Service Center (LCSC) representatives. A Clarification (CLR) was transmitted back to KPMG for each LSR. While KPMG was investigating the error cause and preparing a supplemental service request based on the CLR, BellSouth order activity continued[2].

According to BellSouth, the LCSC representative canceled one of the two internal service orders, the New Connect Order, in each migration order. The corresponding Disconnect Order was allowed to proceed through the BellSouth service order processing systems.

As a result, BellSouth disconnected the end user's retail service without reconnecting their service with KPMG. Since KPMG's view of the LSR status indicated the orders were in erred status, supplemental service requests were issued. In response to these supplements, KPMG received CLR messages stating that the customer accounts were "final," or disconnected.

---

[1] On a loop migration order, the CLEC requests end user conversion from BellSouth retail service to CLEC UNE service.

[2] Issuance of a CLR indicates that order processing cannot continue without further error-free information. Therefore, when a CLR has been transmitted to a CLEC on a service request, BellSouth service processing should cease.

~TRE0539.DOC

The following service requests received Final Account errors. The Final Account messages came in response to supplemental service requests issued to clear an initial CLR.

Purchase Order Number	VER	Initial CLR Date Rcvd	Initial CLR Message	"Final Account" CLR Message – Date Rcvd
305A122PTH102002[3] (CC = 9994)	00	12/22/99	"BAN 2 should be populated with Q account info. Please resubmit."	1/13/00 Account is Final
305A122PTH102001[4]	00	12/17/99	"ACT Code of "V" invalid with REQTYP "AB". If Disconnecting TN send separate order."	1/13/00 Account is Final

Impact

Continuing service activity after issuing a CLR, in this case disconnecting retail service without reconnecting the UNE loop component, can cause a significant disruption of service to CLEC customers, and will result in diminished CLEC customer satisfaction.

The following service requests received Final Account errors. The Final Account messages came in response to supplemental service requests issued to clear an initial CLR.

Purchase Order Number	VER	Initial CLR Date Rcvd	Initial CLR Message	"Final Account" CLR Message – Date Rcvd
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Impact

Continuing service activity after issuing a CLR, in this case disconnecting retail service without reconnecting the UNE loop component, can cause a significant disruption of service to CLEC customers, and will result in diminished CLEC customer satisfaction.

---

[3] The original PON for this customer's order was 305A122PTH101002. Since the supplemental service request was issued more than 10 days after receipt of the CLR notice, KPMG submitted a new PON to continue the service request. PONs with CLRs outstanding greater than 10 days are cancelled by BLS.

[4] The original PON for this customer's order was 305A122PTH101001.

~TRE0539.DOC

ⓐ *BELLSOUTH*

February 21, 2000

EXCEPTION REPORT

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

Exception:

BellSouth disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.

In response to two loop migration[1] local service requests (LSRs), KPMG has received an error message indicating that the "Account is Final".

To process migration LSRs, BellSouth generates two internal service orders:
1. Disconnect Order;
2. New Connect Order.

Two migration service requests that contained errors were submitted via TAG. As a result of the errors in the LSRs, each dropped out for manual handling by BellSouth Local Carrier Service Center (LCSC) representatives. A Clarification (CLR) was transmitted back to KPMG for each LSR. While KPMG was investigating the error cause and preparing a supplemental service request based on the CLR, BellSouth order activity continued[2].

According to BellSouth, the LCSC representative canceled one of the two internal service orders, the New Connect Order, in each migration order. The corresponding Disconnect Order was allowed to proceed through the BellSouth service order processing systems.

As a result, BellSouth disconnected the end user's retail service without reconnecting their service with KPMG. Since KPMG's view of the LSR status indicated the orders were in erred status, supplemental service requests were issued. In response to these supplements, KPMG received CLR messages stating that the customer accounts were "final," or disconnected.

---

[1] On a loop migration order, the CLEC requests end user conversion from BellSouth retail service to CLEC UNE service.
[2] Issuance of a CLR indicates that order processing cannot continue without further error-free information. Therefore, when a CLR has been transmitted to a CLEC on a service request, BellSouth service processing should cease.

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305A122PTH102001[4]	00	12/17/99	"ACT Code of "V" invalid with REQTYP "AB". If Disconnecting TN send separate order."	1/13/00 Account is Final

Impact

Continuing service activity after issuing a CLR, in this case disconnecting retail service without reconnecting the UNE loop component, can cause a significant disruption of service to CLEC customers, and will result in diminished CLEC customer

BellSouth Response

BellSouth modified logic in the Local Exchange Service Order Generator on February 12, 2000. With the change, all service orders mechanically generated will be mechanically cancelled if the orders encounter errors during the creation process. This modification will prevent the situation referenced in the above table.

---

[3] The original PON for this customer's order was 305A122PTH101002. Since the supplemental service request was issued more than 10 days after receipt of the CLR notice, KPMG submitted a new PON to continue the service request. PONs with CLRs outstanding greater than 10 days are cancelled by BLS.

[4] The original PON for this customer's order was 305A122PTH101001.

<u>CERTIFICATE OF SERVICE</u>
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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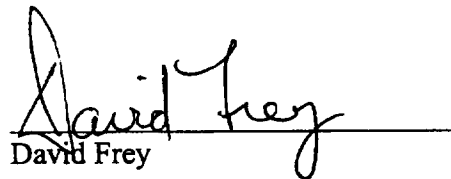4000 Highlands Parkway
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Fred McCallum Jr.
General Counsel - Georgia

March 2, 2000

DELIVERED BY HAND

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Executive Secretary
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MAR 0 2 2000

EXECUTIVE SECRETARY
G.P.S.C.

Re: *In re: Investigation Into Development of Electronic Interfaces for BellSouth's Operations Support Systems*; Docket No. 8354-U
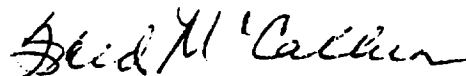
Dear Ms. O'Leary:

Enclosed please find an original and twenty-eight (28) copies, as well as an electronic copy, of BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan (STP) Version 1.1 for filing in the above-referenced matter. I would appreciate your filing same and returning copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

In accordance with the Georgia Public Service Commission's (GPSC) January 12, 2000 Order, and significant input from the CLEC community, Version 1.1 of the STP provides an enhanced description of a plan for additional KPMG tests of BellSouth OSS systems, interfaces, and processes, beyond those described in the GPSC-approved Master Test Plan.

KPMG will accept comments on the Proposed STP from Georgia CLECs and other parties of record until close of business, Monday, March 6, 2000. CLEC comments should be directed by U.S. mail to Christopher Casey at KPMG Consulting, 270 Peachtree Street, N.E., Suite 1050, Atlanta, GA 30303, or by email at christophercasey@kpmg.com.

Very truly yours,

Fred McCallum Jr.

FJM:nvd
Enclosures

cc: Parties of Record

199564/199495

<u>CERTIFICATE OF SERVICE</u>
Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, **BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan, Version 1.1**, 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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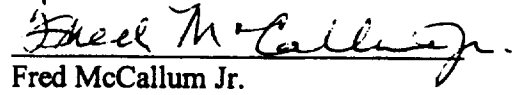Director of Legal and Government Affairs
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This 2nd day of March, 2000.

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EXECUTIVE SECRETARY
G.P.S.C.

BellSouth Telecommunications, Inc.
OSS Evaluation – Georgia
Supplemental Test Plan

Draft

Version 1.01

Submitted by:

KPMG Consulting

Copyrighted 2000

~~January 22~~March 1, 2000

Contents

I. Document Control

A. Distribution

Table I-1: Distribution List for Document

Contact	Organization	Date Sent
David Burgess	Georgia Public Service Commission	
Leon Bowles	Georgia Public Service Commission	
Dennis Sewell	Georgia Public Service Commission	
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Milton McElroy	BellSouth	
William Stacy	BellSouth	
Bennett Ross	BellSouth	
Claudia Fox	FCC	
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Stephanie Folse	Louisiania Public Service Commission	
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Raymond Sears	KPMG	
Michael Weeks	KPMG	
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Elizabeth Fuccillo	KPMG	
Terry Trudgian	KPMG	
Brian Rutter	KPMG	

B. Approved By

Table I-2: Approval List for Document

Person	Department	Date
David Burgess	Georgia Public Service Commssion	

Table I-3: Version Control

Version	Date	Reason
1.0	January 22, 2000	Initial Draft Release
1.1	March 1, 2000	Draft Release

C. Revision Notes

Location	Description of Change
	Draft 1.1 March 1, 2000
Test Plan Cover Page	Version and date
I. Document Control	
Page 1	Version, date, and reason
II. Introduction	
Page 3-4	B. Scope – Text and editorial changes
Page 7	F. Structure – Addition of appendices (table)
III. Test Plan Framework	
Page 8	A. Test Scenarios – Text and editorial changes
Page 9	B. Test Domains – Text change
IV. Performance Metrics Review Test	
Page 15	C. Scope – Text and editorial changes
Page 17	2.2 Objectives – Text and editorial changes
Page 18	Table IV-2 – Text and editorial changes
Page 23	Table IV-5 – Text and editorial changes
V. Pre-Ordering, Ordering, and Provisioning Test Section	
Page 27	B. Organization – Text and editorial changes
Page 28	C. Scope – Text and editorial changes; 1.0 Title – Test name and number change; 1.1 Description – Text and editorial changes
Page 29	1.1 Description - Text and editorial changes; 1.2 Objective - Text and editorial changes
Page 30-31	1.4 Test Scope - Text and editorial changes
Page 32	1.5 Test Approach - Text and editorial changes
Pages 33-38	2.0 – Addition of test
Pages 38-42	2.0 – Elimination of test
Page 42	3.0 Title – Number change; 3.1 Description - Text and editorial changes
Page 43	3.3 Entrance Criteria - Text and editorial changes
Page 46	4.0 Title – Test name and number change; 4.1 Description - Text and editorial changes; 4.2 Objective - Text and editorial changes; 4.3 Entrance Criteria - Text and editorial changes
Page 47	4.4 Test Scope - Text and editorial changes; Table V-4 – Title change, Text and editorial changes; Table V-5 – Title change, Text and editorial changes
Page 48	4.5 Test Approach - Text and editorial changes
Pages 49-52	5.0 – Elimination of test
Pages 53-54	6.0 – Elimination of test
Pages 54-56	5.0 – Additon of test
Pages 56-58	6.0 – Addition of test
Pages 58-61	7.0 – Addition of test
Appendix B	
Page 82	B. Proposed Products and Services for Evaluation - Text and editorial changes; C. Analysis and Commentary - Text and editorial changes
Appendix C	
Page 83	Addition of Appendix C, Test Scenarios

II. Introduction

A. Background

The Telecommunications Act of 1996 (the Act) requires BellSouth Telecommunications, Inc. (BLS) in Georgia to:

- Provide just, reasonable, and nondiscriminatory access to its operations support systems (OSS);

- Provide the documentation and support necessary for competitive local exchange carriers (CLECs) to access and use these systems; and

- Demonstrate that BLS's systems are operationally ready and meet prescribed performance standards.

Compliance with these requirements will allow competitors to obtain pre-ordering information, submit service orders for resold services and unbundled network elements (UNEs), submit trouble reports, and obtain billing information at a level deemed to be non-discriminatory when compared with BLS's retail operations.

The Georgia Public Service Commission (GAPSC) and BLS have directed KPMG LLP (KPMG) to design and execute this Supplemental Test Plan. This test, in combination with additional OSS evaluations executed under the direction of the GAPSC and described in *BellSouth – Georgia OSS Evaluation Master Test Plan* (Master Test Plan) will assist the GAPSC in assessing whether BLS is meeting the requirements of the Act.

B. Scope

This document describes the plan to evaluate BLS's OSS systems, interfaces, and processes that enable CLECs to compete with BLS for customers' local telephone service, beyond the scope of activities described by the GAPSC in the Master Test Plan.

The supplemental plan has been divided into ~~four~~ five test areas to organize and facilitate testing:

- Performance Metrics Review

- Pre-Order, Order & Provisioning

- Maintenance & Repair (xDSL)

- Billing

- Change Management

Within each of the test areas, the methods and processes to be applied to measure BLS's performance are described along with the specific points in the systems and processes where BLS performance will be evaluated. The results of the test will be compared

against measures and criteria identified by the GAPSC and other measures and criteria as deemed appropriate by the GAPSC. This plan also describes the application of scenarios to be used within the Pre-Order, Ordering & Provisioning test family in evaluating BLS's OSS and related support services. KPMG will develop scenarios used in the test to evaluate the functionality of BLS's pre-ordering, ordering, and provisioning systems for resale and xDSL products and services. The scenarios will be designed to depict real-world situations that CLECs currently face or may face in the near future. ~~The scenarios will be developed upon determination of the resale products to be tested, based on the process described in Appendix B.~~ The test will be conducted using the ~~latest~~ BLS interfaces in production for <u>both</u> electronic <u>and manual</u> order submission. These interfaces will include TAG (machine-to-machine) and EDI <u>for resale products, and web and manual processes for xDSL products</u>.

This supplemental plan will adopt the military-style test philosophy, which suggests a "test until you pass" approach. This is believed to be in the best interest of all parties seeking an open, competitive market for local services in Georgia.

C. Objective

The overall objective of this document is to provide a description of a plan to test additional BLS OSS systems, interfaces, and processes beyond those described in the GAPSC-approved Master Test Plan. This Supplemental Test Plan shall be the basis by which individual tests can be developed and executed. The test results will further assist the GAPSC in determining whether BLS's provision of access to OSS functionality enables and supports CLEC entry in the local market. To meet these objectives, KPMG developed this Supplemental Test Plan that will evaluate components of the CLEC/ILEC relationship under real world conditions.

D. Audience

The audience for this document falls into two main categories:

1. Readers using this document during the testing process

2. Interested parties who have some stake in the result of the BLS OSS evaluation and wish to have insight into the evaluation effort

The primary user of this document is KPMG, identified by BLS and the GAPSC as Test Manager. Others are the GAPSC, BLS, the CLECs, the Department of Justice (DOJ), the Federal Communications Commission (FCC), and other State Commissions.

Test Manager

KPMG, as Test Manager, has overall responsibility for the management of the testing process described in this document. This document will be used by KPMG to guide the various parties involved in this testing effort, including any additional entities utilized by KPMG to simulate the CLEC/ILEC relationship.

Georgia Public Service Commission

The Georgia Public Service Commission is responsible for providing input on additional tests, measures, or criteria that should be considered. KPMG will provide results and preliminary evaluation of the results to the GAPSC. The GAPSC is responsible for the final evaluation of the test results.

BellSouth

BLS will use this document to understand the supplemental testing framework and requirements in order to prepare for and support test execution.

The CLEC Community

The CLECs will use this document to understand the breadth and depth of the supplemental testing. In addition, this document describes the elements required of the CLECs to prepare for their role in the tests. The terms ALECs and CLECs are synonymous, and the term CLECs will be used throughout this document.

Department of Justice

The Department of Justice may observe the process of developing, conducting, and evaluating the tests.

The Federal Communications Commission

The Federal Communications Commission may observe the process of developing, conducting, and evaluating the tests.

E. Assumptions

This section describes the assumptions made in the development of this Supplemental Test Plan.

- BLS will provide suitable resources in sufficient numbers to assist KPMG with the evaluation effort.

- BLS will provide access to appropriate documentation.

- BLS will provide the necessary resources, facilities, and support for KPMG and/or designated vendor(s) to establish connectivity with its systems and to create the test bed required to execute the tests (e.g., office space; equipment; IDs; security access; customer accounts and addresses; and appropriate company codes).

- BLS will process test transactions as part of normal processing including the provisioning of some scenarios/test cases.

- BLS and, where appropriate, CLECs will provide the facilities required to execute the live scenarios.

- BLS and, where appropriate, CLECs will allow KPMG to observe retail and wholesale processes on-site during the evaluation effort.

- BLS and the CLECs will give KPMG access to historical data and current operational reports, as needed, to complete the evaluation.

- BLS will allow the inspection of algorithms that may have a bearing on parity access.

- BLS will maintain a stable environment for the duration of the evaluation.

- Regulatory, legal, and confidentiality issues or concerns can be resolved without significant impact to either the intent of the tests, the ability to execute the tests, or the schedules for their execution.

In some cases, certain order types, troubles, and processes may not be practically tested within the test. Examples include orders with very long interval periods or high volumes of test provisioning transactions. Accordingly, the test may take the form of an interview, inspection, live orders review, review of historical performance or operational reports, or some other method that will capture the performance of BLS with respect to the order types and processes in question. The Test Plans will identify the tests that can be executed live and those that must be executed by other means. Long interval tests that prove to have no alternative test methods that foreshorten the test will be referred, with a recommendation for disposition, to the GAPSC. The GAPSC will make the final decision regarding the disposition of such tests.

Operational, time, and resource constraints make it impossible to construct a completely exhaustive test suite. Provision has been made in the plan to amend or extend the test coverage if, in the judgment of the GAPSC, an amendment or extension is deemed justified.

F. Document Structure

This section describes the structure of the document. It includes a table that lists each major section number along with a brief description.

Table II-1 Document Overview

Sect. No.	Section	Content
1	Document Control	Identifies document distribution and necessary approvals.
II	Introduction to the Document	Documents project background, scope, and objectives, assumptions, and limitations. Includes who should read the document, and how it is structured.
III	Test Plan Framework	Describes the methodologies for additional testing of BLS's systems, interfaces and processes. Includes how testing is segmented and organized, testing components, entrance and exit criteria, data acquistion, and traceability.
IV	Performance Metrics Review Test Section	Describes the methods and procedures for additional evaluation of BLS's data collection, transfer, and processing into its performance metrics.

Sect. No.	Section	Content
V	Pre-Order, Order & Provisioning Test Section	Describes the methods and procedures for verifying and validating BLS's core systems and processes associated with ordering and provisioning resale and xDSL products, and through a series of transaction tests, manually submitted orders, and inspection.
VI	Maintenace and Repair Test Section	Describes the methods and procedures for evaluating BLS's processes for xDSL trouble reporting and repairs, and TAFI and ECTA functionality for resale services.
VII	Billing Test Section	Describes the methods and procedures for evaluating BLS's resale service billing and usage generation systems and processes.
VIII	Change Management Test Section	Describes the methods and procedures for evaluating BLS's processes for, and implementation of, its OSS '99 release.
Appendix A	Statistical Approach	Describes the statistical methods and procedures for evaluating BLS's performance for all Performance Metrics Review tests.
Appendix B	Resale Products for Functional Evaluation	Describes the methodology for testing BLS Resale products and services for functional evaluation.
Appendix C	Test Scenarios	Describes the scenarios for functional evaluation of Resale and xDSL products and services.

III. Test Plan Framework.

The supplemental evaluations of BLS's OSS are designed to build on those described in the Master Test Plan approved by the GAPSC. In constructing a Supplemental Test Plan, many factors were considered, including the systems and processes to be tested, the measurement points and respective evaluation criteria, and the necessary conditions required to stage successful, efficient, and objective evaluations. KPMG will execute all tests listed in this plan.

The supplemental test plan framework was defined along four key dimensions:

- Test Scenarios

- Test Domains

- Test Processes

- Evaluation Criteria

The test scenarios and the test domains define **what is to be tested.** *Test scenarios* provide the contextual basis for testing by defining the transactions, products, volumes, data elements, and other variables that must be considered and included during testing. The *test domains* define the systems and processes to be tested.

Test processes and evaluation criteria define **how testing will be conducted.** *Test processes* define the techniques, measures, inputs, activities, and outputs of each component test. *Evaluation criteria* serve as the basis for evaluation by defining the norms against which test results are compared.

These concepts are discussed in more detail in the following sections.

A. Test Scenarios

Based on KPMG's industry experience, the knowledge gained from the New York Public Service Commission Test and the Pennsylvania Public Utility Commission Test, as well as a review of the evaluations described in the Master Test Plan, KPMG has developed a representative set of additional test scenarios for evaluation in Georgia.

The test scenarios describe, at a high level, realistic situations in which CLECs purchase wholesale services from BLS to be resold to the CLECs' end-user customers on a retail basis. The key principles applied in generating the additional scenarios include: (1) emulating real world coverage, mix, and types of transactions while (2) balancing the requirement for practical and reasonably executable transactions that would not unduly disrupt normal production or negatively affect customer service. In general, each test scenario describes a real-world situation that will be used to create test cases. A summary of the scenarios ~~will be published in the STP following determination of the products and features to be tested, as described in Appendix B~~is provided in Appendix C.

B. Test Domains

The areas subject to testing exist in four domains that mirror major business functions performed by a telecommunications carrier:

- Pre-Order, Order, and Provisioning (PO&P)
- Maintenance and Repair (M&R)
- Billing (BLG)
- Change Management (CM)

These four domains correspond to four respective business functions that comprise, in part, the BLS/CLEC relationship.

Pre-Order, Order, and Provisioning Domain

This domain is comprised of the systems, processes, and other operational elements associated with BLS's support for Pre-Ordering, Ordering, and Provisioning activities for wholesale services. The purpose of the specified tests is to evaluate resale interface functionality and provisioning processes, to evaluate manual ordering and provisioning processes for xDSL services, to evaluate compliance with prescribed measurements, and to provide a basis for comparing this operational area to parallel systems and processes supporting BLS's Retail Operations.

Maintenance and Repair Domain

This domain is comprised of the systems, processes, and other operational elements associated with BLS's support for Wholesale Maintenance and Repair activities. The purpose of the specified tests is to evaluate Maintenance and Repair activities on resale services and xDSL-capable loops.

Billing Domain

This domain is comprised of the systems, processes and other operational elements associated with BLS's support for Wholesale Billing. The purpose of the specified tests is to evaluate activities for resale service billing and usage generation systems.

Change Management Domain

This domain is comprised of the policies and practices for managing change in the systems, processes and other operational elements necessary for BLS's establishment and maintenance of business relationships with the CLECs. Supplemental test activities in Change Management will focus on an evaluation of BLS's OSS '99 release.

C. Test Processes

Within each of the test domains, specific test processes to be executed have been defined.

In general, two kinds of tests have been developed:

- Transaction-Driven System Analysis – those that rely on initiation of transactions, tracking of transaction progress, and analysis of transaction completion results to evaluate a system under test.

- Operational Analysis – those that focus on the form, structure, and content of the business process under study. This test method will be used to evaluate day-to-day operations and operational management practices, including policy development, procedural development, and procedural change management.

CLEC Involvement

CLECs operating in Georgia will be given an opportunity to participate in specified components of this test. The inclusion of selected CLEC live transactions provides an alternative test method for transactions which may not be practical to provide through the test infrastructure, and facilitates a more realistic depiction of real world production. CLEC participation will also be solicited to provide real test cases during the test period.

Additionally, KPMG will organize regularly scheduled meetings with the GAPSC and the CLECs to keep interested parties apprised of all relevant aspects of the test activities described in this Supplemental Test Plan, as well as the activities described in the Master Test Plan.

D. Evaluation Criteria

Measures and their corresponding evaluation criteria provide the basis for conducting tests. Evaluation criteria are the norms, benchmarks, standards, and guidelines used to evaluate measures identified for testing. Evaluation criteria provide a framework for the scope of tests, the types of measures that must be taken during testing, and the approach necessary for analyzing results.

There are four types of evaluation criteria:

Table III-1: Evaluation Criteria

Evaluation Criteria Type	Description	Examples
Quantitative	These criteria set a threshold for performance where a numerical range of values is possible, such as response time.	System response time is four seconds or less.
Qualitative	These criteria set a threshold for performance	Documentation defining change

Evaluation Criteria Type	Description	Examples
	where a range of quality values is possible, such as level of customer satisfaction.	notification procedures is adequate.
Parity	These are criteria that require two measurements to be developed and compared, such as whether external response time is at least as good as internal response time.	CLEC transaction time is no greater than BLS Retail transaction time.
Existence	These are criteria where only two possible test results can exist (e.g., true/false, presence/absence), such as whether a document exists or not.	Documentation defining change notification procedures exists.

The evaluation criteria to be applied in the overall test effort are based largely on the legal and regulatory requirements for functionality and performance applicable to BLS's OSS. Overall, evaluation criteria are derived from three types of sources, as shown below.

Table III-2: Sources of Evaluation Criteria

Evaluation Criteria Source Types	Description
Legal and Regulatory Requirements	Requirements specified by statute and regulation, such as FCC orders, court orders, GAPSC regulations, federal and state statutes, and other binding requirements resulting from judicial or governmental proceedings.
Consensus Requirements	Norms, benchmarks and standards developed by formal consensus proceedings.
Good Management Practices (GMP)	Widely recognized standards and guidelines promulgated by sanctioned industry and governmental organizations and other bodies (e.g., Telecommunications and Industry Forum); also includes benchmarks, performance goals, and guidelines derived from industry and topic area experts, BLS and CLEC performance targets, publications, academic journals and other sources.

E. Test Process Elements

The test process includes a description of the test, its objectives, the targets and scope of the test, the measures to be used, the test scenarios which apply to the test, the test's inputs, activities, and outputs, as well as entrance and exit criteria. Each test process specifies the evaluation techniques used to capture and analyze information developed during testing and the evaluation measures used to conduct testing.

1.0 Entrance Criteria

Entrance criteria are those requirements that must be met before individual tests can commence. Global entrance criteria, which apply to every individual test (except where noted otherwise), include the following:

1. **The Test Plan has been approved.**

   The Supplemental Test Plan must be approved by the GAPSC.

2. **All legal dependencies have been resolved.**

Any pending legal and regulatory proceedings that impact the ability to perform the additional test activities must be concluded in a manner, which allow testing to proceed. Any necessary legal or regulatory approvals must be secured.

3. **All required BLS interface capabilities must be operationally ready.**

Electronic interfaces to all OSS access functions of Pre-Ordering, Ordering, and Provisioning must be fully tested and operational.

For transaction tests to begin, the test infrastructure established for the test activities identified in the Master Test Plan must continue to be operationally ready.

Table III-3: Global Entrance Criteria

Criteria	Responsible Party
The Test Plan has been approved.	GAPSC
All legal dependencies have been resolved.	BLS, GAPSC
Resolutions to legal dependencies approved.	GAPSC
All required BLS interface capabilities must be operationally ready.	BLS
The Interface Test Tool must be operationally ready.	KPMG

2.0 Exit Criteria

Exit criteria are the requirements that must be met before the tests defined in the Test Plan can be concluded.

Global exit criteria, which apply to every individual test (except where noted otherwise), include the following:

1. **All test activities required by the test plan must be completed.**

For each test, all fact finding and analysis activities must be completed. All results and test methodologies have been documented. Any exceptions must be resolved or re-testing completed, unless specifically exempted by the GAPSC.

2. **All change control, verification, and confirmation steps have been completed.**

The results of test activities must be documented and reviewed for accuracy. Any results that require clarification or follow-up are confirmed.

In addition to these global exit criteria, test-specific exit criteria, where applicable, are defined within each test.

Table III-4: Exit Criteria

Criteria	Responsible Party
All required test activities must be completed	KPMG
All change control, verification, and confirmation steps have been completed	KPMG

3.0 Evaluation Techniques

Each test relies on one or more techniques to collect and record measurements and analyze the results. The five types of techniques defined for this test are described in the chart below.

Table III-5: Evaluation Techniques

Technique	Description
Transaction Generation	Transaction generation is the use of live, historical, and/or generated data which is executed through the system under review. The results of this test are evaluated for quality.
Report Review	Review and analysis of historical data, reports, metrics, and other information in order to assess the effectiveness of a particular system or business function. This includes performance measurement reports and other management reports.
Inspection	Physical review of process activities and products, including site visits, walk-throughs, read-throughs, interviews, and work center observations.
Logging	Monitoring activities and collecting information by logging process events and products as they happen. Logging can be mechanized or manual.
Document Review	Compilation and review of books, manuals, and other publications related to the process and system under study.

IV. Performance Metrics Review Test

A. Purpose

The purpose of this document is to define the specific tests to be undertaken in evaluating the systems, processes, and other operational elements associated with BLS's support for Performance Metrics (Service Quality Measurements). These tests are in addition to the initial metrics-related tests described in the *BellSouth – Georgia OSS Evaluation Master Test Plan*:

       – PRE-2:   Pre-Ordering Performance Results Comparison

       – O&P-7:   O&P Performance Results Comparison

       – BLG-5:   Billing Performance Results Comparison

       – M&R-7:   M&R Performance Results Comparison

B. Organization

The Performance Metrics Review is organized into three test target areas, which represent the key focus areas for testing in this domain. The three test target areas are:

- Standards & Definitions
- Data Processing
- Data Retention

The Performance Metrics scope section contains a series of tables that identify the specific tests to be associated with each target test area. The tables are organized based upon subject test matter.

The subsequent section, Performance Metrics Review "Test Process," provides additional information and tables that further define the testing approach, inputs, outputs, as well as entrance and exit criteria.

C. Scope

The Performance Metrics Review test family comprises three test target areas, representing important and generally distinct areas of effort undertaken by BLS. The three test target areas are:

- Standards & Definitions
- Data Processing
- Data Retention

Each target test area is further broken down into a number of increasingly discrete Process and Sub Process Areas that serve to identify the particular area of interest under test.

The Performance Metrics Review Test extends to all OSS process domains: Pre-Ordering; Ordering; Provisioning; Maintenance & Repair; Billing; Operator Services (Toll) & Directory Assistance; E911; and Trunk Group Performance and Collocation.

D. Test Process

Six tests have been designed to address the three test target areas. The organization of the subject test processes is as follows:

PMR1: Data Collection and Storage Verification and Validation Review

PMR2: Metrics Definition Documentation and Implementation Verification and Validation Review

PMR3: Metrics Change Management Verification and Validation Review

PMR4: Metrics Data Integrity Verification and Validation Review

PMR5: Metrics Calculation and Reporting Verification and Validation Review

PMR6: Statistical Evaluation of Transactions-Test Metrics

The three test target areas and six metrics tests will review Service Quality Measures reported by BLS, in part based on requirements of state and federal regulators.

The metrics tests will involve an examination of both live industry data and, where applicable, data from the test transactions performed by KPMG. Both CLEC (Resale and UNE) and Retail data will be included in the test.

1.0 Test PMR1: Data Collection and Storage Verification and Validation Review

1.1 Description

This test evaluates key policies and practices for collecting and storing raw and target data necessary for the creation of performance metrics. Both the procedures for data used in the calculation of the reported metrics and for data required in the calculation of retail analogs will be included. This test will rely on checklists and inspections.

1.2 Objectives

The objectives of this test are to determine the adequacy and completeness of key policies and procedures for collecting and storing performance data.

1.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3

Criteria	Responsible Party
Interview guides/questionnaire developed	KPMG
Interviewees identified and scheduled	BLS, KPMG
Detailed evaluation checklists completed	KPMG

1.4 Test Scope

Table IV-1 Test Target: Data Collection and Storage Verification and Validation Review

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Collection of Data	Collection policies & procedures for CLEC and retail data	Adequacy and completeness of collection policies and procedures	Inspection Document review Report review	Qualitative
	Identified collection points	Applicability of and measurability from control points	Inspection	Qualitative
	Collection tools	Adequacy and scalability of data collection tools	Inspection	Qualitative
	Internal Controls	Adequacy and completeness of the internal control process	Inspection Document review Report Review	Qualitative
Storage of Data	Storage policies & procedures for CLEC and retail data	Adequacy and completeness of storage policies and procedures	Inspection Document review Report review	Qualitative
	Identified storage sites	Applicability of and measurability from control points	Inspection	Qualitative
	Storage tools	Adequacy and scalability of data storage tools	Inspection	Qualitative
	Internal Controls	Adequacy and completeness of the internal control process	Inspection Document review Report Review	Qualitative

1.5 Scenarios

This test does not rely on scenarios.

1.6 Test Approach

1.6.1 Inputs

1. BLS Metrics Policies and Processes documentation
2. PMAP documentation
3. Other procedural and technical documentation
4. Evaluation checklists

5. Interview guides

1.6.2 Activities

1. Gather information

2. Review collection and storage policies and procedures for both CLEC data and data used in calculations of retail analogs

3. Perform walkthrough of BLS facilities that are relevant to the production of performance measurements

4. Perform interviews and documentation reviews

5. Complete evaluation checklists and interview summaries

6. Develop and document findings

1.6.3 Outputs

1. Completed evaluation checklists and interview summaries

2. Summary report

1.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

2.0 Test PMR2: Metrics Definition Documentation and Implementation Verification and Validation Review

2.1 Description

This test evaluates the overall policies and practices for documenting and implementing metrics definitions. This includes policies and practices associated with both CLEC and retail measurements. This test will rely on checklists, document reviews and inspections.

2.2 Objectives

The objectives of this test are to determine the adequacy, completeness, accuracy, and logic of the performance metrics as documented. Implementation of the definitions in this test is restricted tocovers both the exclusions and business rules applied in the creation of the raw data and any exclusions and business rules that are applied in the calculation of the metrics from the raw data. This goes beyond the activities outlined in the Performance Results Comparison tests described in the Master Test Plan which seek to determine whether the metrics as produced by BLS are consistent with the documented definitions.

2.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Interview guides/questionnaire developed	KPMG

Criteria	Responsible Party
Interviewees identified and scheduled	BLS, KPMG
Detailed evaluation checklists completed	KPMG

2.4 Test Scope

Table IV-2 Test Target: Metrics Definition Documentation and Implementation Verification and Validation Review

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Metrics Definition	Documentation of metrics definitions	Adequacy and completeness of Metrics Definitions	Inspection Document review Report review	Qualitative
	Documentation of calculation of metrics	Accuracy and logic of the documented calculation of metrics	Inspection Document review Report review	Qualitative
	Implementation of exclusions and business rules in creation of raw data and calculation of metrics	Consistency between documented exclusions and business rules, and exclusions and business rules used	Inspection Document review Report review	Qualitative
	~~Implementation~~ Validity ~~of other features~~ of instructions for ~~calculations in creation of raw data~~ ~~and~~ calculation of metrics	Consistency between documented ~~calculation~~ definitions and ~~calculation~~ documented instructions for calculation~~performed~~	Inspection Document review Report review	Qualitative

2.5 Scenarios

This test does not rely on scenarios.

2.6 Test Approach

2.6.1 Inputs

1. BLS metrics development documentation
2. PMAP documentation
3. Other procedural and technical documentation that may be appropriate
4. Evaluation checklists
5. Interview guides

2.6.2 Activities

1. Gather information
2. Perform interviews and documentation reviews
3. Complete evaluation checklists and interview summaries
4. Analyze the adequacy and appropriateness of the measures provided in BLS's SQM
5. Develop and document findings

2.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Summary report

2.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

3.0 Test PMR3: Metrics Change Management Verification and Validation Review

3.1 Description

This test evaluates the overall policies and practices for managing changes in BLS's production and reporting of metrics. The changes of concern relate to the management and communication of: metrics definitions and standards, information systems, reports, raw data, documentation, and any related processes. The policies and practices involved relate to both CLEC measurements and, where the standards are retail analogs, retail measurements. This test will rely on checklists, document reviews and inspections.

3.2 Objectives

The objectives of this test are to determine the adequacy and completeness of key procedures for developing, conducting, monitoring, and publicizing change management of the performance metrics.

3.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Interview guides/questionnaire developed	KPMG
Interviewees identified and scheduled	BLS, KPMG
Detailed evaluation checklists completed	KPMG

3.4 Test Scope

Table IV-3 Test Target: Metrics Change Management
Verification and Validation Review

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Change Management	Developing change proposals	Completeness and consistency of change development process	Inspection Document review Report review	Qualitative
	Evaluating change proposals	Completeness and consistency of change evaluation process	Inspection Document review Report review	Qualitative
	Implementing change	Completeness and consistency of change implementation process	Inspection Document review Report review	Qualitative
	Intervals	Reasonableness of change interval	Inspection Document review Report review	Qualitative
	Documentation	Timeliness of documentation updates	Inspection Document review Report review	Qualitative
	Tracking change proposals	Adequacy and completeness of change management tracking process	Inspection Document review Report review	Qualitative

3.5 Scenarios

This test does not rely on scenarios.

3.6 Test Approach

3.6.1 Inputs

1. BLS metrics development documentation
2. PMAP documentation
3. Other procedural and technical documentation that may be appropriate
4. Evaluation checklists
5. Interview guides

3.6.2 Activities

1. Gather information
2. Perform interviews and documentation reviews
3. Complete evaluation checklists and interview summaries

KPMG Consulting

4. Develop and document findings

3.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Summary report

3.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

4.0 Test PMR4: Metrics Data Integrity Verification and Validation Review

4.1 Description

This test evaluates the overall policies and practices for processing the data used by BLS in the production of the reported performance metrics and standards. This test will rely on document reviews, inspections, and comparison of samples of data from different stages of processing. Historical CLEC-aggregate and retail data will be the subjects of the test.

4.2 Objectives

The objective of this test is to determine the integrity of key procedures for processing the data necessary to produce performance metrics.

4.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Interview guides/questionnaire developed	KPMG
Interviewees identified and scheduled	BLS, KPMG
Detailed evaluation checklists completed	KPMG

4.4 Test Scope

Table IV-4 Test Target: Metrics Data Integrity Verification and Validation Review

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Data Integrity	Transfer of data from point(s) of collection, with emphasis on inappropriate deletions	Adequacy and completeness of the data transfer process	Inspection Document review Report review	Qualitative, Quantitative
	Conversion of data from unprocessed to processed form with emphasis on distortions	Adequacy and completeness of the conversion policies and procedures	Inspection Document review Report review	Qualitative, Quantitative

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Data Transfer	Data transfer policies and procedures for CLEC and retail data	Adequacy and completeness of data transfer policies and procedures	Inspection Document review Report review	Qualitative
	Internal controls	Adequacy and completeness of the internal control process	Inspection Document review Report review	Qualitative

4.5 Scenarios

This test does not rely on scenarios.

4.6 Test Approach

4.6.1 Inputs

1. BLS Metrics Change Management Policies and Procedures documentation
2. PMAP documentation
3. Other appropriate procedural and technical documentation
4. Evaluation checklists
5. Interview guides

4.6.2 Activities

1. Gather documentation
2. Perform interviews and documentation reviews
3. Complete evaluation checklists and interview summaries
4. Gather sample of data
5. Analyze data
6. Develop and document findings

4.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Summary report

4.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

5.0 Test PMR5: Metrics Calculation and Reporting Verification and Validation Review

5.1 Description

This test evaluates the processes used to calculate performance metrics and retail analogs. The test will rely on re-calculating CLEC-aggregate metrics and retail analogs from raw data and reconciling any discrepancies to verify and validate the reporting of the metrics. The test will use retrospective data. The test will rely on checklists, document reviews, and inspections.

5.2 Objectives

The objectives of this test are to determine the accuracy of recent metrics calculations and reports.

5.3 Entrance Criteria

Criteria	Responsible Party
All global entrance requirements satisfied	See Table III-3
Successful Completion of PMR3	KPMG

5.4 Test Scope

Table IV-5 Test Target: Metrics Calculation and Reporting Verification and Validation Review

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Metrics Calculations	Replication of metrics calculations	Agreement between re-calculated and reported metrics values	Calculation Comparison	Quantitative
	Reconciliation of discrepancies	Reconciliation of re-calculated and reported metrics values	Revision of calculations	Qualitative
	Implementation of instructions for calculation of metrics	Consistency between documented calculation and calculation performed		

5.5 Scenarios

This test does not rely on scenarios.

5.6 Test Approach

5.6.1 Inputs

1. BLS definitions and standards as verified by PMR2
2. BLS's target database as verified and validated by PMR1
3. PMAP documentation
4. Other appropriate procedural and technical documentation
5. Evaluation checklists

6. Interview guides

5.6.2 Activities

1. Gather information
2. Perform interviews and documentation reviews
3. Complete evaluation checklists and interview summaries
4. Gather data
5. Recreate performance metrics from target data
6. Develop and document findings

5.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Completed performance metrics calculations
3. Summary report

5.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

6.0 Test PMR6: Statistical Evaluation of Transactions Test Metrics

6.1 Description

This test evaluates BLS's service performance for the KPMG Test CLEC using statistical methods to make comparisons to parity and benchmark standards. The test will rely on statistical methods deemed to be appropriate by KPMG, BLS, and other concerned parties. Comparisons will not be conducted for performance measures for which a retail analog or benchmark has not been established.

6.2 Objectives

The objective of this test is to compare BLS's performance metrics generated for the KPMG Test CLEC with the metrics for BLS retail analogs or with a predetermined value.

6.3 Entrance Criteria

Criteria	Responsible Party
All global entrace requirements satisfied	See Table III-3
Successful Completion of PMR5	KPMG

6.4 Test Scope

Table IV-6 Test Target: Statistical Evaluation of Transactions Test Metrics

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Statistical Evaluation	Calculate and compare test statistic to critical value, depending on metric	Test statistic exceeds critical value	Calculation Comparison	Quantitative

6.5 Scenarios

This test does not rely on scenarios.

6.6 Test Approach

6.6.1 Inputs

1. BLS definitions and standards as verified by PMR2
2. BLS's target database as verified and validated by PMR1
3. PMAP documentation
4. Other procedural and technical documentation that may be appropriate
5. Evaluation checklists

6.6.2 Activities

1. Gather information
2. Perform documentation reviews
3. Complete evaluation checklists
4. Gather data
5. Calculate test statistics from performance measures
6. Develop and document findings

6.6.3 Outputs

1. Completed evaluation checklists
2. Completed performance metrics calculations
3. Summary report

6.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

V. Pre-Ordering, Ordering, and Provisioning Test Section

A. Purpose

The purpose of this section is to define the specific tests to be undertaken in evaluating the systems, processes, and other operational elements associated with BLS's support of pre-ordering, ordering and provisioning tests for resale and xDSL wholesale products. The purpose of the specified tests is to evaluate functionality, compliance with measurement agreements, procedures to accommodate increases in wholesale xDSL order volume, and to provide a basis for comparing this operational area to parallel systems and processes supporting BLS's retail operations. Additional order and pre-order tests are described in *BellSouth – Georgia OSS Evaluation Master Test Plan*:

- O&P-1: EDI Functional Test

- O&P-2: TAG Functional Test

- O&P-3: EDI/TAG Normal Volume Performance Test

- O&P-4: EDI/TAG Peak Volume Performance Test

- O&P-5: Provisioning Verification Test

- O&P-6: Order Processing Systems Capacity Management Evaluation

- O&P-7: O&P Performance Results Comparison

- O&P-8: EDI Documentation Evaluation

- O&P-9: TAG Documentation Evaluation

- O&P-10: EDI/TAG Production Volume Performance Test

- PRE-1: TAG Pre-Ordering Functional Test

- PRE-2: Pre-Ordering Performance Results Comparison

- PRE-3: TAG Pre-Ordering Documentation Evaluation

- PRE-4: TAG Pre-Ordering Normal Volume Test

- PRE-5: TAG Pre-Ordering Peak Volume Test

- PRE-6: Pre-Ordering Processing Systems Capacity Management Evaluation

B. Organization

The Ordering and Provisioning Test is comprised of three test target areas. These test target areas include:

1. Pre-Ordering and Ordering

2. Provisioning Verification

3. Ordering and Provisioning Documentation

Each test target area is further broken down in the "Scope" section that follows into a number of discrete Process and Sub Process Areas that serve to identify the particular area of interest to be tested and the types of measures that apply.

For Pre-Ordering, Ordering, and Provisioning there is not a one-to-one correspondence between the test target areas and the Test Processes. One or more tests have been developed to evaluate each test target area dependent on the scope of the testing required in each area. In an effort to simulate the end-to-end ordering and provisioning procedures, evaluation processes will be defined for the following:

- PO&P11: EDI and Tag Resale Functional ~~Test~~Evaluation

- PO&P12: ~~TAG~~ xDSL Functional ~~Test~~Evaluation

- PO&P13: Provisioning Verification Evaluation~~Test~~ – Resale & xDSL

- PO&P14: Documentation ~~Test~~Evaluation – Resale & xDSL

- PO&P15: ~~Manual Order Processing Test~~Capacity Management Work Center Evaluation

- PO&P16: xDSL Systems Capacity Management Evaluation ~~– xDSL~~

- PO&P17: xDSL Process Parity Evaluation

C. Scope

The purpose of this section is to identify the system, process, and document areas that will be tested within the Ordering and Provisioning Test Processes.

The following order types will be tested:

- New install

- Disconnect

- Inside move of the physical termination within a building

- Outside move of an end user location

- Change or modification to an existing Local Service Provider's (LSP) end user

- Record activity for ordering administrative changes

- Suspend

- Restore

- Conversion to new LSP

- Conversion as is

The order types identified above will be ordered using applicable BLS service delivery methods. The following service delivery methods will be tested:

- Resale

- xDSL-capable loops

- <u>ADSL wholesale products</u>

In addition to service activities, directory-listing activities will also be tested.

Transactions will be submitted with known error conditions. Supplements and Cancels will also be tested. Transactions will be submitted during normal CLEC interface operational hours, as documented by BLS.

Multiple end-offices and cities will be tested. Service locations supported by different BLS ordering, provisioning, and Central Office switching and transmission configurations will be tested.

Only a portion of the test cases will be physically provisioned. Some orders will be future dated, allowing them to be canceled prior to work scheduling and provisioning. In addition to test orders, the CLECs will be solicited for "live" orders to assist in the testing of xDSL services. Agreed upon interface business rules and formats negotiated between BLS and the CLECs will be included in the test transaction formats.

Documentation affecting ordering and provisioning of resale and xDSL provided to the CLECs will be reviewed as part of the documentation review.

D. Test Process

This section contains the specific evaluations to be performed in this analysis of BLS's support of resale and xDSL Ordering and Provisioning operations.

1.0 Test PO&P11: EDI and TAG Resale Functional Evaluation

1.1 Description

The EDI and TAG Resale Functional Test Evaluation will evaluate the functional elements of the Pre-Ordering, eOrdering, and pProvisioning; the achievement of prescribed measures; and an analysis of performance in comparison to BLS's retail systems. process for resale products as delivered to CLECs through the EDI interface. This test will be executed by submitting local service requests (LSRs) for resale products against BLS test bed accounts and allowing the process to continue through the return of either a firm order confirmation (FOC) or reject/error notice. These transactions will be permitted to proceed through the physical provisioning process and the return of an

electronic completion notice (CN). This test will address electronically ordered resale requisition type and activity type combinations for business and residence customers based on the product and feature list described in ~~Appendix~~ Appendices B and C. Other functional elements of the resale ordering and provisioning process to be tested include flow-through and non-flow-through orders, full and partial migrations, error conditions, order supplements, directory listings, cancels, dispatch and non-dispatch provisioning, expedites, service order status inquiries, and jeopardy notices delivered through ~~the~~ EDI and TAG interfaces.

Orders will be submitted both as stand-alone transactions and as integrated pre-order/order transactions. For a defined set of integrated transactions, information returned on the pre-order response will be used to populate fields on orders. This activity is undertaken to simulate the system-related activities of a CLEC integrating the pre-order and order functions.

The EDI and TAG ordering and provisioning tests will require BLS to establish a test bed of customer accounts against which to place the requisite service requests. Customer test accounts will be distributed geographically across multiple Georgia Central Offices and switching/transmission equipment configurations. Scenarios for CLEC-to-CLEC migrations will be processed by KPMG using customer data and other requisite order data from CLECs currently doing business with BLS.

Test performance data will also be collected through test management tools.

1.2 Objective

The objective of the EDI and TAG Functional Evaluation ~~Performance Test~~ is to validate the existence, functionality, and behavior of the interfaces and processes established by BLS for pre-ordering, ordering, and provisioning transaction requests and responses. ~~measure BLS's capability to meet agreed upon functionality and measures of service for ordering, and provisioning, and to evaluate the existence of EDI functionality for electronically ordered resale products in accordance with BLS documentation.~~

1.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Identification of EDI data entry/response tracking techniques completed	KPMG
Transaction submission tools installed and configured	KPMG
BLS measurements available at the CLEC level	BLS
Test bed data bases and facilities in place and CSR's provisioned	BLS
Test Scenarios selected	KPMG
Specific Test Cases and expected results developed	KPMG
Detailed "Go/No Go" checklist created	KPMG
Specific Evaluation techniques developed	KPMG
EDI documentation and training materials obtained	KPMG
Provisioning log and activity checklist developed	KPMG
Manual jeopardy/delay notification log developed	KPMG
Successful completion of QA/SRT testing	BLS, KPMG
Test Case execution schedule developed	KPMG

Criteria	Responsible Party
All appropriate Systems Readiness Test (SRT) activities completed	KPMG
Test Plan and evaluation criteria defined and approved	KPMG
Test execution team staffed, scheduled, and trained	KPMG

1.4 Test Scope

~~The table below outlines the processes and sub-processes involved in evaluating BLS Ordering functionality and performance~~Ordering transactions consist of three distinct, but related, processes.

- Pre-Order Processing – submission of requests for information required to complete orders;

- Order Processing – submission of orders required to add/delete/change a customer's service; and

- Provisioning – physical work performed by BLS as a result of the submitted orders.

The following chart contains the processes and sub-processes that will be used in evaluating BLS's pre-ordering, ordering, and provisioning functionality and performance.

Table V-1: Test Target: EDI and TAG Resale Functional Evaluation

Process Area	Sub-Process	Evaluation Measure
Pre-ordering	Retrieve customer CSR	Presence of functionality Timeliness of response Accuracy of response
	Validate Customer Address	Presence of functionality Timeliness of response Accuracy of response
	Reserve and release telephone numbers	Presence of functionality Timeliness of response Accuracy of response
	Request information about services, features, facilities, and PIC/LPIC choices available to customers	Presence of functionality Timeliness of response Accuracy of response
	Determine due date/appointment availability	Presence of functionality Timeliness of response Accuracy of response

Process Area	Sub-Process	Evaluation Measure
Ordering	Submit an order for the migration of a customer from BLS to a CLEC "as is"	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for the migration of a customer from BLS to a customer "as specified"	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for the partial migration of a customer from BLS to a CLEC	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for establishing service for a new customer of a CLEC	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for feature changes to an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for adding lines to an existing CLEC customer.	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for a telephone number change for an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for a directory change for an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for an inside move of an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for the outside move of an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for suspending service of an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for restoring service to an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for disconnecting service from an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Submit an order for disconnecting some lines/circuits for an existing CLEC customer	Presence of functionality Timeliness of response Accuracy of response
	Receive order confirmation	Timeliness of response Accuracy of response Clarity and completeness of response
Supplement and Order	Create supplement transaction(s)	Presence of functionality
	Submit supplement	Presence of functionality Timeliness of response Accuracy of response
	Receive acknowledgment	Timeliness of response Accuracy of response

Process Area	Sub-Process	Evaluation Measure
	Receive FOC/error/reject notification	Timeliness of response Accuracy of response Clarity and completeness of error message.
	Correct error(s)	Timeliness of response Accuracy of response
	Re-send supplement	Presence of functionality
	Receive FOC	Timeliness or response Accuracy of response

1.5 Test Approach

KPMG will utilize various pre-order and order transactions. EDI and TAG transaction test cases and test instances will be developed based on the Ordering and Provisioning Test Case Scenarios. The objective of this test is to validate the accuracy, completeness, and behavior of the EDI and TAG interfaces to BLS for ordering transaction requests and responses.

1.5.1 Inputs

1. Test scenarios and cases
2. Test case execution schedule
3. Interface availability
4. BLS documentation
5. Trained personnel to execute test cases
6. Test "Go/No Go" checklist
7. Detailed operational test plan

1.5.2 Activities

1. Use test cases to develop transactions and transaction content based upon instructions provided in the appropriate documentation

2. Submit EDI and TAG test case transactions according to schedule. Submittal date, time, and appropriate transaction information logged

3. Receive transaction responses via EDI and TAG. Receipt date, time, response transaction type, and response condition (valid vs. reject) are logged

4. Match transaction response to original transaction. Verify that matching transaction can be found and record mismatches

5. Verify that transaction response contains expected data and flag unexpected errors

6. Manually review unexpected errors. Identify error source (KPMG or BLS). Identify and log reason for the error. Determine if test should be discontinued

7. Correct expected errors. Re-submittal date, time, and appropriate information are logged

8. Identify transactions for which responses have not been received. Where multiple responses are expected for the same request, the receipt of each response will be monitored.

9. Record missing responses

10. Log documentation issues uncovered during transactions creation and submission process

11. Review status of pending orders. Verify and record accuracy of response

12. Jeopardy, Pending Facilities Status and delay notifications are recognized and logged. Any jeopardy or delay notifications not received electronically are logged using the jeopardy/delay notification log

13. Generate reports

1.5.3 Outputs

1. Variance between actual test performance and the standards of performance defined in BLS methods and procedures

2. Report of expected results versus actual results

3. Rejects received after confirmation notification and percentage of total

4. Report of unexpected errors categorized by type of problem

5. Transaction counts, error ratio, response time, etc. by transaction type, product family and delivery method

6. Minimum, maximum, mean, average, and aggregate response time/interval per transaction set

7. Transaction counts per response time/interval range per transaction set

8. Orders erred after initial confirmation

9. Completed jeopardy / delay notification logs

10. Summary Report

1.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

2.0 Test PO&P12: xDSL Functional Evaluation

2.1 Description

The xDSL Order Processing Functional Evaluation will evaluate the functional elements of the Pre-Ordering, Ordering, and Provisioning process for xDSL (Digital Subscriber Line) products as delivered to CLECs over two BLS-supported interfaces: 1) High Speed Data Service Order Entry Gateway System (SOEG), or 2) manually. Pre-ordering will include submission of Service Inquiries to BellSouth to determine loop characteristics. This test cycle will be executed by submitting local service requests (LSRs) for xDSL products against BLS test bed accounts and allowing the process to continue through the return of either a firm order confirmation (FOC) or reject/error notice. A number of these transactions will be permitted to proceed through the physical provisioning process and the return of an electronic or faxed completion notice (CN).

CLECs participating in this test will be interviewed and their experiences will be incorporated into the test results after validation by the Test Manager. In addition, for some types of transactions, involvement will be sought from CLECs to participate in some aspects of the live transaction testing. CLEC participation will be important for complex orders that cannot be simulated adequately in the test environment.

This test will address the BLS Wholesale ADSL service offering orderable either through SOEG or manually. This test cycle will also address all manually ordered loops capable of xDSL service. Other functional elements of the xDSL ordering and provisioning process to be tested include full and partial migrations, error conditions, order supplements, directory listings, cancels, dispatch and non-dispatch provisioning, expedites, service order status inquiries, and jeopardy notices delivered through the manual interfaces.

Orders will be submitted as both stand alone transactions and as integrated pre-order /order transactions. Note that although some of the transactions to order xDSL products will be submitted manually, the related pre-orders will be submitted electronically or manually, depending on the information required. For a defined set of integrated transactions, information returned on the pre-order response will be used to populate fields on subsequent orders. This activity is undertaken to simulate the system-related activities of a CLEC wishing to integrate the pre-order and order functions.

The xDSL ordering and provisioning tests will require BLS to establish a test bed of customer accounts against which to place the requisite service requests. Customer test accounts will be distributed geographically across multiple Georgia Central Offices and switching/transmission equipment configurations.

2.2 Objective

The objective of the xDSL functional evaluation is to measure BLS's capability to meet agreed upon functionality and measures of service for pre-ordering, ordering, and provisioning through established electronic and manual processes in accordance with BLS documentation.

2.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
All documentation pertaining to Manual Order processing pertaining to xDSL obtained	BLS
Identification of Manual Ordering data entry/response tracking techniques completed	KPMG
BLS measurements available at the CLEC level	BLS
Test bed data bases and facilities in place and CSR's provisioned	BLS
Test Scenarios selected	KPMG
Identify CLEC participants in order to utilize xDSL capabilities	KPMG, CLEC(s)
Specific Test Cases and expected results developed	KPMG
Detailed "Go/No Go" checklist created	KPMG
Specific Evaluation techniques developed	KPMG
Successful completion of QA/SRT testing	BLS, KPMG
Test Case execution schedule developed	KPMG
Test Plan and evaluation criteria defined and approved	KPMG
Test execution team staffed, scheduled, and trained	KPMG

2.4 Test Scope
The table below outlines the processes and sub-processes involved in evaluating BLS's xDSL Ordering functionality and performance

Table V-2: Test Target: xDSL Functional Evaluation

Process Area	Sub-Process	Evaluation Measure
Submit a Service Inquiry	Submit Loop Inquiry	Accesibility of interface
	Receive response to Loop Inquiry	Timeliness of Response Accuracy and completeness of response
Submit an Order	Create order transaction(s).	Accessibility of fax interface
	Submit Local Service Request (LSR).	Presence of functionality for manual processing
	Receive acknowledgment.	Presence of Response
	Receive Firm Order Confirmation (FOC)/error/reject notification.	Timeliness of Response Accuracy and completeness of response
	Submit expedited order transaction.	Accuracy and completeness of response.
Submit an Error	Create error transaction(s).	Timeliness of response Accuracy of response Clarity and completeness of error message
	Receive acknowledgment.	Timeliness of response Accuracy and completeness of error message.
	Receive planned error/reject	Timeliness of response

Table V-2: Test Target: xDSL Functional Evaluation

Process Area	Sub-Process	Evaluation Measure
	notification.	Accuracy of response Clarity and completeness of error message
	Correct error(s).	Timeliness of response Accuracy of response
	Re-send integrated LSR.	Accessibility of fax interface
	Receive FOC.	Timeliness of response Accuracy of response
Supplement an Order	Create supplement transaction(s).	Presence of functionality
	Submit supplement.	Presence of functionality Timeliness of response Accuracy of response
	Receive acknowledgment.	Timeliness of response Accuracy of response
	Receive FOC/error/reject notification.	Timeliness of response Accuracy of response Clarity and completeness of error message
	Correct error(s).	Timeliness of response Accuracy of response
	Re-send supplement.	Presence of functionality for manual processing
	Receive FOC.	Timeliness of response Accuracy of response
Receive Completion Notice (CN)	Receive CN transaction.	Timeliness of response Accuracy of response
Receive Pending Facility Status	Receive pending facility (PF) notification.	Timeliness of response Accuracy of response
Receive Jeopardy Notification	Receive jeopardy notification transaction.	Timeliness of response Accuracy and completeness of response
Check Service Order Status	Check service order status.	Accuracy of response

2.5 Test Approach

KPMG will utilize various *x*DSL transaction test cases and test instances developed based on the ordering and provisioning test case scenarios. The objective of this test is to validate the accuracy and completeness of orders to BLS for ordering transaction requests and responses.

2.5.1 Inputs

1. *x*DSL test cases for ordering
2. Test case execution schedule
3. Manual order handling methods and procedures
4. BLS documentation
5. Trained personnel to execute test cases
6. Test "Go / No Go" checklist
7. Detailed operational test plan

2.5.2 Activities

1. Use test cases to develop transactions and transaction content based upon instructions provided in the appropriate documentation

2. Submit ordered test case transactions for Ordering according to schedule. (CLEC participation may be required)

3. Match transaction response to original transaction. Verify that matching transaction can be found and record mismatches

4. Verify that transaction response contains expected data and flag non-expected errors

5. Manually review non-expected errors. Identify error source (PMG or BLS). Identify and log reason for the error. Determine if test should be discontinued

6. Correct expected errors. Re-submittal date, time, and appropriate information are logged

7. Identify transactions for which responses have not been received. Where multiple responses are expected for the same request, the receipt of each response will be monitored. Record missing responses

8. Log documentation issues uncovered during transactions creation and submission process

9. Review status of pending orders. Verify and record accuracy of response

10. Jeopardy, Pending Facilities Status, and delay notifications are recognized and logged. Any jeopardy or delay notifications not received electronically are logged using the jeopardy/delay notification log

11. Verify correct provisioning on a sampling of orders that have been completed. Record results in appropriate provisioning log and activity checklist

12. Generate reports

2.5.3 Outputs

1. Variance between actual test performance and the standards of performance defined in BLS methods and procedures

2. Report of expected results versus actual results

3. Rejects received after confirmation notification and percentage of total

4. Report of unexpected errors categorized by type of problem

5. Transaction counts, error ratio, response time, etc. by transaction type, product family and delivery method

6. Minimum, maximum, mean, average, and aggregate response time/interval per transaction set

7. Transaction counts per response time/interval range per transaction set

8. Orders erred after initial confirmation

9. Completed jeopardy / delay notification logs

10. Summary Report

2.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

2.0 Test O&P12: TAG Functional Evaluation

2.1 Description

The TAG Functional Test will evaluate the functional elements of the pre-order, ordering, and provisioning processes for resale products as delivered to CLECs through the TAG interfaces. This test will be executed by submitting local service requests (LSRs) for resale products against BLS test bed accounts, and allowing the process to continue through the return of either a firm order confirmation (FOC) or reject/error notice. These transactions will be permitted to proceed through the physical provisioning process and the return of an electronic completion notice (CN). This test will address electronically ordered resale requisition type and activity type combinations for business and residence customers based on the product and feature list described in Appendix B. Other functional elements of the resale ordering and provisioning process to be tested include flow through and non-flow through orders, full and partial migrations, error conditions, order supplements, directory listings, cancels, dispatch and non-dispatch provisioning, expedites, service order status inquiries, and jeopardy notices delivered through the TAG interface.

Orders will be submitted both as stand-alone transactions and as integrated pre-order /order transactions. For a defined set of integrated transactions, information returned on the pre-order response will be used to populate fields on orders. This activity is undertaken to simulate the system-related activities of a CLEC's integrating the pre-order and order functions.

The TAG ordering and provisioning tests will require BLS to establish a test bed of customer accounts against which to place the requisite service requests. Customer test accounts will be distributed geographically across multiple Georgia Central Offices and switching/transmission equipment configurations. Scenarios for CLEC to CLEC migrations will be processed by KPMG using customer data and other requisite order data from CLECs currently doing business with BLS.

Test performance data will also be collected through test management tools.

2.2 Objective

The objective of the TAG Functional Evaluation Performance Test is to measure BLS's capability to meet agreed upon functionality and measures of service for pre-order, ordering, and provisioning, and to evaluate the existence of TAG functionality for electronically ordered resale products in accordance with BLS documentation.

2.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Identification of TAG data entry/response tracking techniques completed	KPMG
Transaction submission tools installed and configured	KPMG
BLS measurements available at the CLEC level	BLS
Test bed data bases and facilities in place and CSR's provisioned	BLS
Test Scenarios selected	KPMG
Specific Test Cases and expected results developed	KPMG
Detailed "Go/No Go" checklist created	KPMG
Specific Evaluation techniques developed	KPMG
TAG documentation and training materials obtained	KPMG
Provisioning log and activity checklist developed	KPMG
Manual jeopardy/delay notification log developed	KPMG
Successful completion of QA/SRT testing	BLS, KPMG
Test Case execution schedule developed	KPMG
All appropriate Systems Readiness Test (SRT) activities completed	KPMG
Test Plan and evaluation criteria defined and approved	KPMG
Test execution team staffed, scheduled, and trained	KPMG

2.4 Test Scope

The table below outlines the processes and sub-processes involved in evaluating BLS Ordering functionality and performance.

Table V-2: Test Target: TAG Functional Evaluation

Submit an Order	Create order transaction(s).	Accessibility of interface
	Submit integrated Local Service Request (LSR).	Presence of functionality
	Receive acknowledgment.	Presence of Response
	Receive Firm Order Confirmation (FOC)/error/reject notification.	Timeliness of Response Accuracy and completeness of response

Table V-2: Test Target: TAG Functional Evaluation

	Submit expedited order transaction.	Presence of functionality
Submit an Error	Create error transaction(s).	Timeliness of response Accuracy of response Clarity and completeness of error message
	Receive acknowledgment.	Timeliness of response Accuracy and completeness of error message.
	Receive planned error/reject notification.	Timeliness of response Accuracy of response Clarity and completeness of error message
	Correct error(s).	Timeliness of response Accuracy of response
	Re-send integrated LSR.	Presence of functionality
	Receive FOC.	Timeliness of response Accuracy of response
Supplement an Order	Create supplement transaction(s).	Presence of functionality
	Submit supplement.	Presence of functionality Timeliness of response Accuracy of response
	Receive acknowledgment.	Timeliness of response Accuracy of response
	Receive FOC/error/reject notification.	Timeliness of response Accuracy of response Clarity and completeness of error message
	Correct error(s).	Timeliness of response Accuracy of response
	Re-send supplement.	Presence of functionality
	Receive FOC.	Timeliness of response Accuracy of response
Pre-order/Order Integration	Populate integration orders with information returned from designated pre-order response.	Accuracy of response Clarity and completeness of response
	Submit integration orders.	Presence of functionality
	Receive acknowledgement.	Timeliness of response Accuracy of response
	Receive error/reject notification.	Timeliness of response Accuracy of response Clarity and completeness of error message
	Correct errors.	Timeliness of response Accuracy of response
	Re-send integration order.	Presence of functionality
	Receive FOC.	Timeliness of response Accuracy of response
Receive Completion Notice (CN)	Receive CN transaction.	Timeliness of response Accuracy of response
Receive Pending Facility Status	Receive pending facility (PF) notification.	Timeliness of response Accuracy of response
Receive Jeopardy Notification	Receive jeopardy notification transaction.	Timeliness of response Accuracy and completeness of response
Check Service Order Status	Check service order status.	Accuracy of response

2.5 Test Approach

~~KPMG will utilize various pre-order and order transactions. TAG transaction test cases and test instances will be developed based on the Pre-Order, Ordering and Provisioning Test Case Scenarios. The objective of this test is to validate the accuracy, completeness, and behavior of the TAG interface to BLS for pre-order and ordering transaction requests and responses~~

2.5.1 Inputs

1. ~~Test scenarios and cases~~

2. ~~Test case execution schedule~~

3. ~~Interface availability~~

4. ~~BLS documentation~~

5. ~~Trained personnel to execute test cases~~

6. ~~Test "Go/No Go" checklist~~

7. ~~Detailed operational test plan~~

2.5.2 Activities

1. ~~Use test cases to develop transactions and transaction content based upon instructions provided in the appropriate documentation~~

2. ~~Submit TAG test case transactions according to schedule. Submittal date, time, and appropriate transaction information logged~~

3. ~~Receive transaction responses via TAG. Receipt date, time, response transaction type, and response condition (valid vs. reject) are logged~~

4. ~~Match transaction response to original transaction. Verify that matching transaction can be found and record mismatches~~

5. ~~Verify that transaction response contains expected data and flag unexpected errors~~

6. ~~Manually review unexpected errors. Identify error source (KPMG or BLS). Identify and log reason for the error. Determine if test should be discontinued~~

7. ~~Correct expected errors. Re-submittal date, time, and appropriate information are logged~~

8. ~~Identify transactions for which responses have not been received. Where multiple responses are expected for the~~

same request, the receipt of each response will be monitored.

9. Record missing responses

10. Log documentation issues uncovered during transactions creation and submission process

11. Review status of pending orders. Verify and record accuracy of response

12. Jeopardy, Pending Facilities Status and delay notifications are recognized and logged. Any jeopardy or delay notifications not received electronically are logged using the jeopardy/delay notification log

13. Generate reports

2.5.3 Outputs

1. Variance between actual test performance and the standards of performance defined in BLS methods and procedures

2. Report of expected results versus actual results

3. Rejects received after confirmation notification and percentage of total

4. Report of unexpected errors categorized by type of problem

5. Transaction counts, error ratio, response time, etc. by transaction type, product family and delivery method

6. Minimum, maximum, mean, average, and aggregate response time/interval per transaction set

7. Transaction counts per response time/interval range per transaction set

8. Orders erred after initial confirmation

9. Completed jeopardy / delay notification logs

10. Summary Report

2.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

3.0 Test PO&P13: Provisioning Verification Evaluation

3.1 Description

The Provisioning Verification Test will evaluate BLS's ability to accurately and expeditiously complete the provisioning of service requests placed in the PO&P11 and O&P12 EDI and TAG Functional TestsEvaluation. This analysis will focus on electronically ordered resale products. In addition, to test the full functionality of BLS's provisioning process, orders will be supplemented and canceled, require outside dispatch, and require validation of record changes associated with resale orders and address provisioning of new services or functionality.

The Provisioning Verification Test will also evaluate BLS's ability to accurately and expeditiously complete the provisioning of service requests placed in the PO&P15 P12 xDSL Manual Order Processing Functional TestEvaluation. This analysis will focus on electronic and manually ordered orderable xDSL products, and involves the physical inspection of BLS's provisioning process. To test the end-to-end provisioning process on xDSL orders, participation of real CLECs will be solicited for observation of provisioning activities. In addition, to test the full functionality of BLS's provisioning process, orders will be supplemented and canceled, require outside dispatch, and address customer coordination.

Test performance data will be collected by a KPMG on-site observer, and results will be included as inputs to the final report.

3.2 Objective

The objective of the Provisioning Evaluation Test is to measure BLS's capability to meet agreed-upon functionality and measures of service for provisioning of xDSL and Resale products

3.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
PO&P11, O&P12, and PO&P15 P12: EDI, TAG, and Manual xDSL Order Functional Tests successfully executed	KPMG
Transaction submission tools (electronic or manual) installed and configured/in place	KPMG
BLS measurements/methods and procedures available at the CLEC level	BLS
Test bed data bases and facilities in place and CSR's provisioned	BLS
CLEC participant(s) for xDSL capabilities (xDSL Capable Loop/Wholesale ADSL) identified	KPMG, CLEC(s)
Test Scenarios selected	KPMG
Specific Test Cases and expected results developed	KPMG
Detailed "Go/No Go" checklist created	KPMG
Specific Evaluation techniques developed	KPMG
Interview guide/questionnaire(s) completed for BLS & CLEC	KPMG
Provisioning log and activity checklist developed	KPMG
Manual jeopardy/delay notification log developed	KPMG
Test Case execution schedule developed	KPMG

Criteria	Responsible Party
All appropriate Systems Readiness Test (SRT) activities completed	KPMG
Test Plan and evaluation criteria defined and approved	KPMG
Test execution team staffed, scheduled, and trained	KPMG

3.4 Test Scope

The table below outlines the processes and sub-processes involved in evaluating BLS's provisioning of xDSL and Resale products.

Table V-3: Test Target: Provisioning Verification Evaluation

Process Area	Sub-Process	Evaluation Measure
Receive completion notification	Receive completion notification transaction	Timeliness of response Timeliness of dates Accuracy of data
	Match response to order transaction and confirmation	Accuracy of provisioning
	Verify receipt of completion notification	Completion notification received for all transactions
Provision BLS Service	Receive design documents	Accuracy of data
	Confirm provisioning date and time – determine coordinated/non-coordinated/coordinated-time specific.	Accuracy of data
	Perform provisioning activities.	Timeliness of dates Timeliness of completion
	Perform testing activities.	Accuracy of provisioning Timeliness of response
	Turn up service.	Accuracy of data Timeliness of closure Timeliness of notification
Receive jeopardy notification	Receive jeopardy notification	Timeliness of notification Timeliness of dates Accuracy of data Frequency of notification
	Identify reason for jeopardy	Accuracy of response
	Monitor follow-up activities	Timeliness of closure Compliance with procedures
Receive delay notification	Receive delay notification transaction	Timeliness of response Timeliness of dates Accuracy of data Frequency of delay
	Match response to transaction	Accuracy of response
	Identify reason for delay	Accuracy of response Availability of support
Follow up on delayed provisioning activities	Monitor to closure	Timeliness of closure Compliance to procedures

3.5 Test Approach

KPMG will utilize various order transactions test instances developed based on the ordering and provisioning test case scenarios. The objective of this test is to validate the accuracy, completeness, and timeliness of BLS provisioning for resale and xDSL orders.

3.5.1 Inputs

1. Test cases and expected results
2. Test case execution schedule
3. Provisioning documentation
4. Provisioning log and activity checklists
5. Trained personnel to execute test cases
6. Test "Go/No Go" checklist
7. Interview questionnaire for BLS and CLEC personnel

3.5.2 Activities

1. Use test cases to develop transactions and transaction content based upon instructions provided in the appropriate documentation
2. Analyze Firm Order Confirmation (FOC) for provisioning details
3. Match transaction response to original transaction. Verify that matching transaction can be found and record mismatches
4. Verify that transaction response contains expected data and flag non-expected errors
5. Verify appointment date, time and detail. Meet BLS provisioning staff if applicable
6. Review provisioning activities within BLS Central Offices. Identify and log actions, including date and time of process in provisioning checklist
7. Identify actions warranting exceptions and determine next steps in exception process.
8. Log documentation issues uncovered during provisioning activities
9. Review status of pending orders. Verify and record accuracy of response
10. Jeopardy, Pending Facilities Status and delay notifications are recognized and logged. All jeopardy or delay notifications not received electronically are logged using the jeopardy/delay notification log
11. Verify correct provisioning on a sampling of orders that have been completed. Record results in appropriate provisioning log and activity checklist
12. Conduct interviews with BLS and CLEC personnel

13. Generate reports

3.5.3 Outputs

1. Variance between actual test performance and the standards of performance defined in BLS methods and procedures

2. Report of expected results versus actual results

3. Rejects received after confirmation notification and percentage of total

4. Report of unexpected errors categorized by type of problem

5. Transaction counts, error ratio, response time, etc. by transaction type, product family, and delivery method

6. Transaction counts per response time/interval range per transaction set

7. Completed provisioning logs and checklists

8. Completed jeopardy / delay notification logs

9. Provisioning accuracy and timeliness report

10. Competed interview reports

11. Summary Report

3.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

4.0 Test ~~PO&P~~14: *Resale and* ~~xDSL Manual Order~~ *Documentation Evaluation*

4.1 Description

The ~~EDI and TAG~~Resale and xDSL -Documentation Evaluation is an analysis of the pre-ordering, ordering, and provisioning documentation provided by BLS to CLECs to interact with the EDI, ~~and~~ TAG, and SOEG interfaces, as well as the ~~The Manual Order Processing Documentation Evaluation is an analysis of~~ documentation provided by BLS to CLECs to manually order and provision xDSL products. These evaluations are intended to review the availability, accuracy, timeliness and completeness of BLS's pre-ordering, ordering, and provisioning documentation. A variety of operational analysis techniques will be employed in the evaluations.

The ~~EDI and TAG~~ test will receive input from the PO&P-11~~and O&P-12~~: EDI and TAG Resale Functional ~~Test~~Evaluation exceptions report . ~~The exception reports are based on issues pertaining to documentation that addresses whether system functionality matches that described in the business rules documentation.~~ and the PO&P12: xDSL

Functional Evaluation exceptions report. ~~The Manual Order test will receive input from the O&P 15: Manual Order Processing Functional Test.~~ The exception reports are based on issues pertaining to documentation that addresses whether the manual process matches that described in the business rules documentation.

4.2 Objective

The objective of the ~~EDI, TAG,~~ Resale and xDSL~~and~~ ~~Manual Order~~ Documentation Evaluation is to determine the accuracy, timeliness, availability and usability of the BLS documentation. It is also to determine if the BLS documentation adequately assists CLECs in understanding how to implement and use all of the EDI, TAG, SOEG, and manual ordering and provisioning functions available to them.

4.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
All documentation pertaining to EDI, TAG, SOEG, and Manual Order processing obtained	BLS
Evaluation Checklist for Documentation completed	KPMG
BLS measurements/methods and procedures for development and distribution of documentation available at the CLEC level	BLS
Specific Evaluation techniques developed	KPMG
Interview guide/questionnaire(s) completed for BLS & CLEC	KPMG
Test Plan and evaluation criteria defined and approved	KPMG
Test execution team staffed, scheduled, and trained	KPMG
Exception report(s) arising from documentation issues from PO&P11 ~~and O&P12~~: EDI and TAG Functional ~~Test~~Evaluation, and from PO&P15P12: ~~Manual~~ xDSL ~~Order~~ Functional ~~Test~~ Evaluation obtained	KPMG
BLS and CLEC documentation Order Specialist and User contact information provided	BLS, CLEC(s)

4.4 Test Scope

Table V-4 below identifies the specific documentation to be tested under PO&P14: ~~EDI, TAG, and Manual Order Documentation~~ Documentation Evaluation – Resale & xDSL~~Evaluation~~. Additional documentation found during the course of testing may be included in the documentation evaluation. Table V-5 below outlines the processes and sub-processes involved in evaluating BLS's documentation for xDSL and Resale products.

Table V-4: Documentation to be Tested for PO&P14: ~~EDI, TAG, and Manual Order~~ Documentation Evaluation – Resale & xDSL

Document Name
BellSouth Local Exchange Ordering Guide, Volume 1 (Issue 7M)
BellSouth Local Exchange Ordering Guide, Volume 4 (TCIF 7)
Resale Based Advisory Guide
TAG Programmers Training Guide
Telecommunications Access Gateway (TAG) API Reference Guide

TAG Programmers Job Aid
BellSouth Ordering Guide for CLECs
Product and Service Interval Guide
High Speed Data Service Order Entry Gateway Systems (SOEG) Network Service Provider User Guide
Resale Activation Requirements

Table V-5: Test Target: ~~EDI, TAG, and Manual~~Resale and xDSL ~~Order~~ Documentation Evaluation

Process Area	Sub-Process	Evaluation Measure
Acquire Documentation	Receive current documentation	Availability and timeliness of documentation
Evaluate Documentation	Evaluate documentation format	Organization of documentation
	Evaluate EDI Interface Documentation	Usability, comprehensiveness, and accuracy of documentation
	Evaluate LEO-IG Documentation	Usability, comprehensiveness, and accuracy of documentation
	Evaluate TAG Interface Documentation	Usability, comprehensiveness, and accuracy of documentation
	Evaluate xDSL Manual Ordering Documentatoin	Usability, comprehensiveness, and accuracy of documentation

4.5 Test Approach

KPMG will use operational analysis techniques to evaluate BLS's documentation. Prior to the initiation of the test, evaluation checklists will be created to facilitate a structured review of documentation based on standard criteria set forth in the MTP. KPMG will perform a structured review of BLS documentation, visit the BLS Interconnection Web site, and verify the accuracy of documentation during live tests of BLS EDI, ~~and~~ TAG, and SOEG systems, as well as manual ordering processes. The documentation review conducted during live testing will allow for evaluation of the usefulness of the documentation in a business environment.

4.5.1 Inputs

1. Documentation pertaining to EDI, TAG, SOEG, and manual ordering for xDSL products

2. Log of all documentation issues uncovered during provisioning activities

3. Detailed operational test plan and task checklist

4. Interview questionnaire for BLS and CLEC personnel

5. Documentation evaluation checklist

4.5.2 Activities

1. Conduct documentation evaluation of each document using the documentation evaluation checklist

2. Conduct documentation interviews with BLS documentation specialists and CLEC documentation users

3. Compile results and create summary reports

4.5.3 Outputs

1. Variance between actual test performance and the standards of performance defined in BLS methods and procedures

2. Report of expected results versus actual results

3. Report of unexpected documentation errors categorized by type of problem

4. Completed interview reports

5. Summary Report

4.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

5.0 Test O&P15: xDSL Manual Order Processing Evaluation

5.1 Description

The Manual Order Processing Functional Test will evaluate the functional elements of the ordering and provisioning process for xDSL products as delivered to CLECs by the manual ordering process. This test cycle will be executed by submitting local service requests (LSRs) for xDSL products against BLS test bed accounts and allowing the process to continue through the return of either a firm order confirmation (FOC) or reject/error notice. A number of these transactions will be permitted to proceed through the physical provisioning process and the return of a faxed completion notice (CN). This test cycle will address all manually ordered loops capable of xDSL requisition type and activity type combinations for business and residence customers. Other functional elements of the xDSL ordering and provisioning process to be tested include full and partial migrations, error conditions, order supplements, directory listings, cancels, dispatch and non-dispatch provisioning, expedites, service order status inquiries, and jeopardy notices delivered through the manual interfaces.

Orders will be submitted as both stand-alone transactions and as integrated pre-order /order transactions. Note that although all of the transactions to order xDSL products will be submitted manually, the related pre-orders will be submitted electronically or manually, depending on the information required. For a defined set of integrated transactions, information returned on the pre-order response will be used to populate

~~fields on subsequent orders. This activity is undertaken to simulate the system-related activities of a CLEC wishing to integrate the pre-order and order functions.~~

~~The manual ordering and provisioning tests will require BLS to establish a test bed of customer accounts against which to place the requisite service requests. Customer test accounts will be distributed geographically across multiple Georgia Central Offices and switching/transmission equipment configurations.~~

~~**5.2 Objective**~~

~~The objective of the Manual Order Processing Test is to measure BLS's capability to meet agreed upon functionality and measures of service for ordering and provisioning, and to evaluate the existence of manual ordering functionality for xDSL products in accordance with BLS documentation.~~

~~**5.3 Entrance Criteria**~~

~~Criteria~~	~~Responsible Party~~
~~All global entrance criteria satisfied~~	~~See Table III-3~~
~~All documentation pertaining to Manual Order processing pertaining to xDSL obtained~~	~~BLS~~
~~Identification of Manual Ordering data entry/response tracking techniques completed~~	~~KPMG~~
~~BLS measurements available at the CLEC level~~	~~BLS~~
~~Test bed data bases and facilities in place and CSR's provisioned~~	~~BLS~~
~~Test Scenarios selected~~	~~KPMG~~
~~Identify CLEC participants in order to utilize xDSL capabilities~~	~~KPMG, CLEC(s)~~
~~Specific Test Cases and expected results developed~~	~~KPMG~~
~~Detailed "Go/No Go" checklist created~~	~~KPMG~~
~~Specific Evaluation techniques developed~~	~~KPMG~~
~~Successful completion of QA/SRT testing~~	~~BLS, KPMG~~
~~Test Case execution schedule developed~~	~~KPMG~~
~~Test Plan and evaluation criteria defined and approved~~	~~KPMG~~
~~Test execution team staffed, scheduled, and trained~~	~~KPMG~~

~~**5.4 Test Scope**~~
~~The table below outlines the processes and sub-processes involved in evaluating BLS's Manual Ordering functionality and performance. CLEC participation may be required in order to test xDSL functionality.~~

~~*Table V-6: Test Target: xDSL Manual Order Processing Evaluation*~~

~~Submit an Order~~	~~Create order transaction(s).~~	~~Accessibility of fax interface~~
	~~Submit Local Service Request (LSR).~~	~~Presence of functionality for manual processing~~
	~~Receive acknowledgment.~~	~~Presence of Response~~
	~~Receive Firm Order Confirmation (FOC)/error/reject notification.~~	~~Timeliness of Response~~ ~~Accuracy and completeness of response~~
	~~Submit expedited order transaction.~~	~~Accuracy and completeness of response.~~
~~Submit an Error~~	~~Create error transaction(s).~~	~~Timeliness of response~~

Table V-6: Test Target: xDSL Manual Order Processing Evaluation

Process Area	Process	Evaluation Measures
		Accuracy of response Clarity and completeness of error message
	Receive acknowledgment.	Timeliness of response Accuracy and completeness of error message.
	Receive planned error/reject notification.	Timeliness of response Accuracy of response Clarity and completeness of error message
	Correct error(s).	Timeliness of response Accuracy of response
	Re-send integrated LSR.	Accessibility of fax interface
	Receive FOC.	Timeliness of response Accuracy of response
Supplement an Order	Create supplement transaction(s).	Presence of functionality
	Submit supplement.	Presence of functionality Timeliness of response Accuracy of response
	Receive acknowledgment.	Timeliness of response Accuracy of response
	Receive FOC/error/reject notification.	Timeliness of response Accuracy of response Clarity and completeness of error message
	Correct error(s).	Timeliness of response Accuracy of response
	Re-send supplement.	Presence of functionality for manual processing
	Receive FOC.	Timeliness of response Accuracy of response
Receive Completion Notice (CN)	Receive CN transaction.	Timeliness of response Accuracy of response
Receive Pending Facility Status	Receive pending facility (PF) notification.	Timeliness of response Accuracy of response
Receive Jeopardy Notification	Receive jeopardy notification transaction.	Timeliness of response Accuracy and completeness of response
Check Service Order Status	Check service order status.	Accuracy of response

5.5 Test Approach

KPMG will utilize various manually ordered xDSL transaction test cases and test instances developed based on the ordering and provisioning test case scenarios. The objective of this test is to validate the accuracy and completeness of manually processed orders to BLS for ordering transaction requests and response.

5.5.1 Inputs

1. xDSL test cases for manual ordering
2. Test case execution schedule
3. Manual order handling methods and procedures
4. BLS documentation

5. ~~Trained personnel to execute test cases~~

6. ~~Test "Go / No Go" checklist~~

7. ~~Detailed operational test plan~~

~~5.5.2 Activities~~

1. ~~Use test cases to develop transactions and transaction content based upon instructions provided in the appropriate documentation~~

2. ~~Submit manually ordered test case transactions for Ordering according to schedule. (CLEC participation may be required)~~

3. ~~Match transaction response to original transaction. Verify that matching transaction can be found and record mismatches~~

4. ~~Verify that transaction response contains expected data and flag non-expected errors~~

5. ~~Manually review non-expected errors. Identify error source (KPMG or BLS). Identify and log reason for the error. Determine if test should be discontinued~~

6. ~~Correct expected errors. Re-submittal date, time, and appropriate information are logged~~

7. ~~Identify transactions for which responses have not been received. Where multiple responses are expected for the same request, the receipt of each response will be monitored. Record missing responses~~

8. ~~Log documentation issues uncovered during transactions creation and submission process~~

9. ~~Review status of pending orders. Verify and record accuracy of response~~

10. ~~Jeopardy, Pending Facilities Status, and delay notifications are recognized and logged. Any jeopardy or delay notifications not received electronically are logged using the jeopardy/delay notification log~~

11. ~~Verify correct provisioning on a sampling of orders that have been completed. Record results in appropriate provisioning log and activity checklist~~

12. ~~Generate reports~~

5.5.3 Outputs

1. Variance between actual test performance and the standards of performance defined in BLS methods and procedures

2. Report of expected results versus actual results

3. Rejects received after confirmation notification and percentage of total

4. Report of unexpected errors categorized by type of problem

5. Transaction counts, error ratio, response time, etc. by transaction type, product family and delivery method

6. Minimum, maximum, mean, average, and aggregate response time/interval per transaction set

7. Transaction counts per response time/interval range per transaction set

8. Orders erred after initial confirmation

9. Completed jeopardy / delay notification logs

10. Summary Report

5.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

6.0 Test O&P16: Capacity Management Evaluation – xDSL

6.1 Description

The xDSL Order Processing Capacity Management Evaluation will assess the scalability of the manual processes for xDSL orders. This evaluation will include a detailed review of the safeguards and procedures in place to plan for and manage projected growth in the capacity of the manual processes and associated workforce.

6.2 Objective

The objective of this evaluation is to determine the extent to which procedures to accommodate increases in wholesale xDSL orders are being actively managed.

6.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Interview guides/questionnaire developed	KPMG
Interviewees identified and scheduled	BLS, KPMG
Detailed evaluation checklists completed	KPMG

6.4 Test Scope

The table below outlines the processes and sub-processes involved in evaluating the management processes and capabilities of BLS to support capacity changes in the order processes associated with xDSL products.

Table V-7: Test Target: O&P Capacity Management Evaluation

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
xDSL Order Processing Capacity Management	Data collection and reporting of business volumes, resource utilization, and performance monitoring	Adequacy and completeness of data collection and reporting	Inspection Interviews	Qualitative
	Data verification and analysis of business volumes, resource utilization, and performance monitoring	Adequacy and completeness of data verification and analysis	Inspection Interviews	Qualitative
	Workforce and Capacity Planning	Adequacy and completeness of workforce and capacity planning	Inspection Interviews	Qualitative

6.5 Scenarios

Scenarios are not used in this test.

6.6 Test Approach

The evaluation of Capacity Management for the manual processes begins with a review of the work center procedural documentation and interviews with center personnel to collect information about the processing of xDSL orders. A structured center walk-through and direct observation of personnel performing their daily work will supplement the planned test interviews and document reviews. Business transaction volume and forecast data will be gathered in order to assess current and future workload. Process models will be developed to assess the capacity and scalability of the manual processes. Work force planning procedures and staffing plans will be evaluated through additional interviews and documentation reviews.

6.6.1 Inputs

1. xDSL manual ordering and related system documentation
2. Capacity management evaluation checklist
3. Interview guides

4.Personnel to perform evaluation

6.6.2 Activities

1.Review procedural and other documentation related to xDSL ordering processing

2.Conduct interviews with key work center personnel as appropriate

3.Document findings

6.6.3 Outputs

1.Completed capacity management evaluation checklist

2.Interview summaries

3.Summary findings and conclusions

6.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

5.0 Test PO&P15: Work Center Capacity Management Evaluation - xDSL

5.1 Description

The Work Center Capacity Management Evaluation will assess the scalability of BLS's manual processes for xDSL (Digital Subscriber Line) pre-order and order processing. This evaluation will include a detailed review of the safeguards and procedures in place to plan for and manage projected growth in the capacity of the manual processes and associated workforce.

5.2 Objective

The objective of this evaluation is to determine the extent to which procedures to accommodate increases in wholesale xDSL orders are being actively managed.

5.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Interview guides/questionnaire developed	KPMG
Interviewees identified and scheduled	BLS, KPMG
Availability of documentation identified as input	BLS, KPMG
Detailed evaluation checklists completed	KPMG

5.4 Test Scope

The table below outlines the processes and sub-processes involved in evaluating BLS's management processes and capabilities to support capacity changes in the pre-order and order processes associated with xDSL products.

Table V-6: Test Target: PO&P Work Center Capacity Management Evaluation

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
xDSL Pre-Order and Order Processing Capacity Management	Data collection and reporting of business volumes, resource utilization, and performance monitoring	Adequacy and completeness of data collection and reporting	Inspection Document Review	Qualitative
	Data verification and analysis of business volumes, resource utilization, and performance monitoring	Adequacy and completeness of data verification and analysis	Inspection Document Review	Qualitative
	Workforce and Capacity Planning	Adequacy and completeness of workforce and capacity planning	Inspection Document Review	Qualitative

5.5 Scenarios

Scenarios are not used in this test.

5.6 Test Approach

The evaluation of Capacity Management for the manual processes begins with a review of the work center procedural documentation and interviews with work center personnel to collect information about the processing of xDSL orders. Structured center walk-throughs and direct observation of personnel performing their daily work will supplement the planned test interviews and document reviews. Business transaction volume and forecast data will be gathered in order to assess current and future workload. Process models will be developed to assess the capacity and scalability of the manual processes. Work force planning procedures and staffing plans will be evaluated through additional interviews and documentation reviews.

5.6.1 Inputs

1. xDSL pre-order and order process documentation
2. Staffing and capacity planning process documentation
3. Capacity management evaluation checklist
4. Interview guides
5. Personnel to perform evaluation

5.6.2 Activities

1. Review procedural and other documentation related to xDSL pre-order and ordering processing

2. Review procedural documentation related to staffing and capacity planning

3. Conduct center walk-throughs, observations and interviews with key work center personnel, as appropriate

4. Document findings

5.6.3 Outputs

1. Completed capacity management evaluation checklist

2. Interview summaries

3. Summary findings and conclusions

5.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

6.0 Test PO&P16: ADSL Systems Capacity Management Evaluation

6.1 Description

The ADSL (Asymmetric Digital Subscriber Line) Systems Capacity Management Evaluation is a detailed review of the safeguards and procedures in place to plan for and manage projected growth in the use of the High Speed Data Service Order Entry Gateway (SOEG) System.

6.2 Objective

The objective of this evaluation is to determine the extent to which BLS's procedures to accommodate increases in the ADSL interface transaction volumes and users are being actively managed.

6.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Interview guides/questionnaire developed	KPMG
Interviewees identified and scheduled	BLS, KPMG
Availability of documentation identified as input	BLS, KPMG
Detailed evaluation checklists completed	KPMG

6.4 Test Scope

The table below outlines the processes and sub-processes involved in evaluating BLS's management processes and capabilities to support capacity changes in ADSL orders.

Table V-7: Test Target: PO&P16 ADSL Systems Capacity Management Evaluation

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
ADSL System Capacity Management	Data collection and reporting of business volumes, resource utilization, and performance monitoring	Adequacy and completeness of data collection and reporting	Inspection Document Review	Qualitative
	Data verification and analysis of business volumes, resource utilization, and performance monitoring	Adequacy and completeness of data verification and analysis	Inspection Document Review	Qualitative
	System and Capacity Planning	Adequacy and completeness of system and capacity planning	Inspection Document Review	Qualitative

6.5 Scenarios

Scenarios are not applicable to this test.

6.6 Test Approach

Interviews will be conducted with key system administration personnel responsible for the operation of the SOEG system. These interviews will be supplemented with an analysis of BLS capacity management procedures as well as evidence of related activities such as: periodic capacity management reviews; system reconfiguration/load balancing; and load increase induced upgrades.

6.6.1 Inputs

1. SOEG system technical documentation
2. Capacity Management process documentation
3. Capacity management evaluation checklist
4. Interview guides
5. Personnel to perform evaluation

6.6.2 Activities

1. Review procedural and other documentation related to SOEG system capacity management
2. Review system technical documentation

3. Conduct interviews with key system administration personnel

4. Document findings

6.6.3 Outputs

1. Completed capacity management evaluation checklist

2. Interview summaries

3. Summary findings and conclusions

6.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

7.0 Test PO&P17: xDSL Process Parity Evaluation

7.1 Description

The *x*DSL (Digital Subscriber Line) Process Parity Evaluation is a review of the processes, systems, and interfaces that provide pre-order, order, and provisioning for CLEC and Reseller *x*DSL orders. The review will focus on these areas:

- Pre-Order and Order interfaces

- Workflow definitions

- Workforce scheduling

- Facility administration

- Service activation

- Test and acceptance

- Exception handling

- Completion notices

Operational analysis techniques will be used to evaluate BLS's systems and processes for parity with corresponding Retail functions for *x*DSL. It will consist of targeted interviews of key development and process-owner personnel along with structured reviews of process, system, and interface documentation. Structured center walk-throughs, interviews with center personnel and direct observation of personnel performing their daily work will supplement the development and process-owner interviews and documentation reviews.

7.2 Objective

The objective of this evaluation is to determine the degree to which the pre-order, order and provisioning environment supporting CLEC xDSL orders is on parity with BLS's retail environment.

7.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria	See Table III-3
Detailed xDSL Process Parity Evaluation Checklist developed	KPMG
Pre-order, order and provisioning process documentation available	BLS
Technical platforms specifications available	BLS
Databases specifications available	BLS
Data communications and interfaces specifications available	BLS
Interview guide/questionnaire developed	KPMG
Interviewees identified and schedule developed	BLS, KPMG

7.4 Test Scope

The table below outlines the processes and sub-processes involved in evaluating parity for BLS's processes for pre-order, order and provisioning of xDSL products.

Table V-8: Test Target: PO&P17 xDSL Process Parity Evaluation

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
xDSL Pre-order	xDSL Service Inquiry	Comparable processes between wholesale and retail	Inspection Document Review	Parity
	xDSL Loop Qualification	Comparable processes between wholesale and retail	Inspection Document Review	Parity
xDSL Ordering	xDSL Order Submission	Comparable processes between wholesale and retail	Inspection Document Review	Parity
	xDSL Order Entry	Comparable processes between wholesale and retail	Inspection Document Review	Parity

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
xDSL Provisioning	xDSL Workflow Management	Comparable processes between wholesale and retail	Inspection Document Review	Parity
	xDSL Workforce Management	Comparable processes between wholesale and retail	Inspection Document Review	Parity
	xDSL Facilities Assignment	Comparable processes between wholesale and retail	Inspection Document Review	Parity
	xDSL Service Activation	Comparable processes between wholesale and retail	Inspection Document Review	Parity

7.5 Scenarios

Scenarios are not applicable to this test.

7.6 Test Approach

7.6.1 Inputs

1. xDSL Pre-order, Order and Provisioning process documentation
2. Interview guide/questionnaire
3. Interviewees (per process area)
   - xDSL process owners
   - xDSL process staff
4. Interview schedule
5. Detailed xDSL Process Parity Evaluation Checklist
6. Appropriate system documentation

7.6.2 Activities

1. Identify all process documentation needed for review.
2. Identify relevant systems and interfaces.
3. Identify all system documentation available for review.
4. Conduct structured review of documentation using xDSL Process Parity Evaluation Checklist.
5. Conduct center walk-throughs, interviews and direct process observations using the interview guides and questionnaires.

    6. Inspect physical systems and communications environments.

    7. Document findings.

7.6.3 Outputs

    1. Completed xDSL Process Parity Evaluation Checklist

    3. Interview summaries

    4. Summary findings and conclusions

7.7 Exit Criteria

Criteria	Responsible Party
All global exit criteria	See Table III-4

VI. Maintenance and Repair Test Section

A. Purpose

The purpose of this section is to define the specific tests to be undertaken in evaluating the equivalence of BLS's end-to-end processes for retail and wholesale trouble reporting and repairs of xDSL lines, as well as to test TAFI and ECTA functionality on resale lines. These tests are in addition to the initial maintenance and repair tests as described in the *BellSouth – Georgia OSS Evaluation Master Test Plan*, which are as follows:

- M&R-1: TAFI Functional Test
- M&R-2: ECTA Functional Test
- M&R-3: ECTA Normal Volume Performance Test
- M&R-4: ECTA Peak Volume Performance Test
- M&R-5: TAFI Capacity Management Evaluation
- M&R-6: ECTA Capacity Management Evaluation
- M&R-7: M&R Performance Results Comparison
- M&R-8: TAFI Documentation
- M&R-9: ECTA Documentation
- M&R-10: M&R Process Evaluation

B. Organization

The Maintenance and Repair Scope section contains a series of tables that identify the specific tests to be associated with each target test area. The tables are organized based upon subject test matter.

The Maintenance and Repair "Test Process" section provides additional information and tables that further define the testing approach, inputs, outputs, as well as entrance and exit criteria.

C. Scope

The Maintenance and Repair test family is comprised of two test target areas, representing important and generally distinct areas of effort undertaken by BLS. These two test target areas are:

- Performance
- Functionality

Each target test area is further broken down into a number of increasingly discrete Process and Sub Process Areas that serve to identify the particular area of interest under test.

D. Test Process

Three tests have been designed to address the two test target areas. The organization of the subject test processes is as follows:

> M&R 11: Maintenance & Repair Process Evaluation of xDSL-Capable Loops
>
> M&R 12: TAFI Functional Test of Resale Lines
>
> M&R 13: ECTA Functional Test of Resale Lines

This section contains the specific evaluations to be performed in this analysis of BLS's maintenance and repair operations in support of Resale and xDSL services.

1.0 Test M&R11: Maintenance and Repair Process Evaluation of xDSL Capable Loops

1.1 Description

The test is comprised of two sub-tests. The first, Sub-Test 1, evaluates the functional equivalence of BLS's maintenance and repair processes for wholesale and retail xDSL trouble reports. Process flows for wholesale and retail trouble management will be reviewed and evaluated along with technician methods and procedures (M&P's) and job aids for wholesale trouble repair. The second element, Sub-Test 2, involves the execution and observation of selected maintenance and repair test scenarios involving xDSL to evaluate BLS's performance in making repairs under the conditions of various wholesale maintenance scenarios.

1.2 Objectives

The objective of Sub-Test 1 is to evaluate the equivalence of BLS's end-to-end processes for retail and wholesale trouble reporting and repair for xDSL lines. The objective of Sub-Test 2 is to evaluate BLS's performance in making repairs to xDSL lines under conditions of various wholesale maintenance scenarios.

1.3.1 Entrance Criteria for Sub-Test 1

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Retail and wholesale process flow documentation available	BLS
Retail and wholesale technician job aids (e.g., M&P's) available	BLS
Process evaluation checklists	KPMG

1.3.2 Entrance Criteria for Sub-Test 2

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Global entrance criteria have been satisfied	See Table III-3
Test scenarios selected	KPMG
Product descriptions and business rules for all transactions to be tested are available.	BST
Test-bed circuits provisioned	BST
Faults inserted into test-bed circuits as required by the test scenarios	KPMG

1.4 Test Scope

Table VI-1 Test Target: Maintenance and Repair Process Evaluation of xDSL-Capable Loops

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
End-to-End M&R Process: xDSL	Process Flow Documentation	Comparison with Retail	Inspection	Parity
	Process Evaluation	Completeness, consistency, and timeliness of the process	Inspection	Qualitative Parity
End-to-End Trouble Report Processing: xDSL	M&R Test Scenarios	Accuracy Timeliness	Inspection	Quantitative Parity

1.5 Scenarios

This test involves the execution and observation of selected maintenance and repair test scenarios involving xDSL products to evaluate BLS's performance in making repairs.

1.6 Test Approach

1.6.1 Inputs

1. Retail and wholesale M&R process flow documentation (xDSL)
2. Other BLS procedural documentation
3. Test bed circuits with embedded faults
4. Trouble interface availability
5. BLS procedural and technical documentation
6. Evaluation checklists
7. Interview guides
8. Detailed operational test plan

1.6.2.1 Activities for Sub-Test 1

1. Review and compare wholesale and retail process flows.
2. Identify differences between the two processes.
3. Analyze process.
4. Assess the potential impact of each difference if possible.
5. Document process analysis results.

1.6.2.2 Activities for Sub-Test 2

1. Conduct circuit test if applicable for each test ID.
2. Note test results.
3. Create and submit trouble tickets via TAFI, ECTA or call-in to the BRMC.
4. Periodically monitor each trouble report throughout its life.
5. Note significant events in the trouble report life cycle (error occurrences, corrections, trouble ticket submission time, time cleared, etc.)
6. Calculate time to repair measurements for each test scenario fault repaired.
7. Document observations.

1.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Summary report

1.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

2.0 Test M&R12: TAFI Functional Test of Resale Lines

2.1 Description

The TAFI (Trouble Analysis Facilitation Interface) Functional Test will evaluate the functional elements of the trouble reporting and screening process for resale services as delivered to CLECs via the TAFI interface in BLS's production environment. This test will be executed by exercising a defined set of TAFI functions associated with trouble management activities against test bed accounts.

2.2 Objectives

The objective of the TAFI Functional Test is to validate the existence of TAFI trouble reporting and screening functionality for resale service customers in accordance with the CLEC TAFI End User Training and User Guide.

2.3. Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Detailed Test Plan completed	KPMG
Test Scenarios selected	KPMG
Specific Test Cases and Transaction Sets developed	KPMG
Product descriptions and business rules for all transactions to be tested available	BLS
Basic documentation review completed	KPMG
Detailed functional checklist created	KPMG
Test bed of working services selected and/or established	BLS
Security access to TAFI established	BLS
Evaluation Criteria defined and approved	GAPSC
Checklists and Interview Guides created	KPMG

2.4 Test Scope

Table VI-2 Test Target: TAFI Functional Test of Resale Lines

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
Trouble Reporting	Create/Enter Trouble Report (TR)	Functionality exists as documented	Inspection	Existence Qualitative Parity
	Modify TR	Functionality exists as documented	Inspection	Existence Qualitative Parity
	Close/Cancel TR	Functionality exists as documented	Inspection	Existence Qualitative Parity
	Retrieve TR Status	Functionality exists as documented	Inspection	Existence Qualitative Parity
Trouble History Access	Retrieve Trouble History	Functionality exists as documented	Inspection	Existence Qualitative Parity
Access To Test Capability	Receive MLT Test Results	Functionality exists as documented	Inspection	Existence Qualitative Parity

2.5 Scenarios

This test involves the execution and observation of selected maintenance and repair test scenarios involving resale lines and features.

2.6 Test Approach

2.6.1 Inputs

1. Test cases
2. Documentation (TAFI End User Guide)
3. Functionality checklists
4. Interview guides
5. Personnel to execute test cases
6. Detailed operational test plan

2.6.2. Activities

1. Use test cases created for this test and appropriate BLS documentation to perform each of the functions listed on the checklist provided via the TAFI interface.
2. Verify that each system function behaves as documented.
3. Note any anomalies in the space provided on the checklist.
4. Note any discrepancies between TAFI documentation and behavior.
5. Ensure that all trouble reports entered in TAFI have been canceled.
6. Use the checklist and interview guide to conduct interviews with BLS personnel selected from the Residence and Business M&R work centers.
7. Observe BLS personnel trouble report activities as identified on the checklist provided.
8. Note the presence and behavior of functions identified on the checklist.
9. Document results and findings.

2.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Summary report

2.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

3.0 Test M&R13: ECTA Functional Test of Resale Lines

3.1 Description

The ECTA Functional Test will evaluate the functional elements of the trouble reporting and screening process for resale services as delivered to CLECs via the ECTA interface. This test will be executed by exercising a defined set of ECTA functions associated with trouble management activities against test bed accounts.

3.2 Objectives

The objective of the ECTA Functional Test is to validate the existence of ECTA trouble reporting and screening functionality for resale service customers in accordance with BLS's published specifications.

3.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Detailed Test Plan completed	KPMG
Test Scenarios selected	KPMG
Specific Test Cases and Transaction Sets developed	KPMG
Product descriptions and business rules for all transactions to be tested available	BLS
Basic documentation review completed	KPMG
Detailed functional checklist created	KPMG
Test bed of working services selected and/or established	BLS
Physical access to BellSouth Trouble entry site established	BLS
Security access to ECTA established	BLS
Evaluation Criteria defined and approved	GAPSC
Checklists and Interview Guides created	KPMG

3.4 Test Scope

Table VI-3 Test Target: ECTA Functional Test of Resale Lines

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
Trouble Reporting	Create/Enter Trouble Report (TR)	Functionality exists as documented	Inspection	Existence Qualitative Parity
	Modify TR	Functionality exists as documented	Inspection	Existence Qualitative Parity
	Close/Cancel TR	Functionality exists as documented	Inspection	Existence Qualitative Parity
	Retrieve TR Status	Functionality exists as documented	Inspection	Existence Qualitative Parity
Trouble History Access	Retrieve Trouble History	Functionality exists as documented	Inspection	Existence Qualitative Parity

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
Access To Test Capability	Initiate MLT Test	Functionality exists as documented	Inspection	Existence Qualitative Parity
	Receive MLT Test Results	Functionality exists as documented	Inspection	Existence Qualitative Parity

3.5 Scenarios

This test involves the execution and observation of selected maintenance and repair test scenarios involving resale lines and features.

3.6 Test Approach

3.6.1 Inputs

1. Test cases
2. BLS documentation
3. Functionality checklists
4. Personnel to execute test cases

3.6.2 Activities

1. Use test cases created for this test and appropriate BLS documentation to perform each of the functions listed on the checklist provided via the ECTA interface.
2. Verify that each system function behaves as documented.
3. Note any anomalies in the space provided on the checklist.
4. Note any discrepancies between M&R trouble entry documentation and behavior of the ECTA interface.
5. Ensure that all trouble reports entered via the ECTA interface have been cancelled.
6. Document results and findings.

3.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Summary report

3.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

VII. Billing Test Section

A. Purpose

The purpose of this section is to define the specific tests to be undertaken in evaluating the billing and message processing operational elements associated with BLS's support of Resale products and services. Additional billing tests are described in the *BellSouth – Georgia OSS Evaluation Master Test Plan*, as follows:

- BLG-1:   CRIS/CABS Invoicing Functional Test
- BLG-2:   ODUF/ADUF Usage Functional Test
- BLG-3:   Billing Systems Capacity Management Evaluation
- BLG-4:   Billing Performance Results Comparison
- BLG-5:   CRIS/CABS Invoicing Documentation Evaluation
- BLG-6:   ODUF/ADUF Documentation Evaluation

B. Organization

The Billing tests are comprised of the following two test target areas:

- Bill Invoicing
- Usage Processing

Each test target area is broken down into a number of process and sub-process areas, described in sections 1.4 and 2.4. These test target areas delineate particular areas of interest to be assessed in evaluating the effectiveness of BLS's procedures as they relate to the production and delivery of Resale bills and Daily Optional Usage Files.

C. Scope

The purpose of this section is to identify the depth and breadth activities, service types, and line configurations that will be included in the test. KPMG will create test scenarios to ensure coverage of the electronically orderable services from the top 50 resale services that do not have significant commercial volume, based on analysis defined in Appendix B. Order activity will include the following service requests:

- New Install
- Inside Move
- Outside Move
- Suspend
- Restore

- Conversion to new LSP

- Add/Change features

- Change telephone

- Add line

D. Test Process

This section contains the specific evaluations to be performed in the analysis of application of rates and charges, and the assembly, recording, and delivery of usage associated with BLS's Resale products and services.

1.0 Test BLG7: CRIS Resale Invoicing Functional Evaluation

1.1 Description

The CRIS Resale Invoicing Functional Test will evaluate BLS's ability to accurately bill functional billing elements associated with Resale products. The test will be executed in conjunction with orders submitted during the execution of the EDI and TAG Functional Evaluations and usage generated during the execution of the Resale Usage Functional Test. These tests are detailed in Section V, 1.0, Section V, 2.0, and Section VII, 2.0 of this STP.

KPMG will examine the functional billing elements of CRIS Resale bills resulting from completed order transactions on test accounts for resale products and services. Functional billing elements include measured and flat rate services, monthly recurring and non-recurring charges, pro-rations, adjustments, late payment, and usage charges. The test will also look at bill formats across all billing service delivery methods to evaluate completeness and readability of each format.

1.2 Objectives

The objectives of this test are to determine the adequacy, accuracy, and timeliness of BLS's billing and invoicing procedures associated with Resale products.

1.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
All CRIS baseline bills produced from the initial test bed	BLS
Techniques and instrumentation developed and approved	KPMG
Test bed matches requirements	BLS
Product descriptions and business rules for all transactions to be tested are available	BLS
Test bed completed and ready	BLS
Method for viewing bills implemented	BLS, KPMG
Inter-Connection Agreement obtained from BLS	BLS, KPMG
Availability of BSL resources to test and produce CRIS bills	BLS

Criteria	Responsible Party
Calls made during Functional Usage Evaluation processed through to the DUF and available for billing	BLS

1.4 Test Scope

Table VII-1 Test Target: Bill Invoicing

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Billing Accuracy	Verify recurring charges	Accuracy completeness of rates and quantity	Inspection	Quantitative
	Verify non-recurring charges	Accuracy and completeness of rates and quantity	Inspection	Quantitative
	Verify pro-rated charges	Accuracy and completeness of rate, quantity and date ranges	Inspection	Quantitative
	Verify usage charges	Accuracy and completeness of minutes of use and rates	Inspection	Quantitative
	Verify adjustments	Accuracy, completeness, and timelness of adjustments	Inspection	Quantatitive
	Verify balance carried forward	Accuracy of balance	Inspection	Quantitative
	Verify discounts	Accuracy and appropriateness of discount	Inspection	Quantitative
	Verify late charges	Accuracy of rate and calculation	Inspection	Quantitative
	Receive copy of bill	Timeliness of media delivery	Logging	
Completeness and Readability	Verify presentation of bill sections	Completeness and accuracy	Inspection	Qualitative
	Verify page header information	Completeness and accuracy	Inspection	Qualitative
	Verify presence of Customer Service Record	Completeness	Inspection	Qualitative
	Verify pagination	Completeness and accuracy	Inspection	Qualitative
	Verify presence of return page	Completeness and accuracy	Inspection	Qualitative
	Verify labeling of charges	Completeness and accuracy	Inspection	Qualitative
	Verify service address	Completeness and accuracy	Inspection	Qualitative

1.5 Test Approach

Test scenarios will be executed in conjunction with orders issued during the O&P EDI and TAG Functional Evaluations. The following order activity will be included: new installs, conversions from BLS to new LSP "as specified," feature adds/changes, telephone number change, additional line, suspend/restore, inside move, and outside move.

Customer Service Records (CSRs) reflecting completed order activity resulting from test case transactions will be used to create an expectation of billable charges. Expected results will be compared against billing invoices produced by BLS to ensure charges are appropriately and accurately billed. Validation procedures will verify whether recurring and non-recurring charges are rated and applied correctly, pro-rations of charges are calculated appropriately, service establishment and disconnection dates are accurately captured, adjustments and late charges are applied correctly, and balances are carried forwarded appropriately. Bills containing usage charges for billable messages will be examined to verify the accuracy of the usage billing components.

Two bill periods will be processed for the same set of customers. The first bill period will consist of baseline bills created for the test bed telephone numbers. The second bill period will consist of bills produced after select scenarios have been executed. This set will include charges for test case activity such as conversions, additions, and usage charges for calls generated during the execution of the Functional Usage Evaluation.

Billing service delivery media utilized for bill validation purposes will include CD-ROMs, Paper, Diskette Analyzer Bill (DAB) and Billing Data Tape (BDT) formats.

1.5.1 Inputs

1. Test scenarios
2. Test case execution
3. Test criteria
4. Detailed test plan
5. Verified baseline bills
6. Test case CSRs
7. Selected usage from Functional Usage Evaluation
8. BLS rate documentation

1.5.2 Activities

1. Develop expected results for each test case
2. Validate baseline bills
3. Validate second bill period
4. Record invoice bill date and actual date received

5. Identify discrepancies

6. Compile results

1.5.3 Outputs

1. Complete evaluation of all test cases

2. Complete evaluation of BLS bill delivery results

3. Final Report

1.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

2.0 Test BLG8: Resale Usage Functional Evaluation

2.1 Description

The Resale Usage Functional Test will evaluate BLS's ability to accurately capture and record usage elements associated with the placement of calls over resale test lines. The test will be executed in conjunction with orders submitted during the execution of the EDI and TAG Functional Evaluations and the CRIS Resale Invoicing Functional Evaluation detailed in Section V, 1.0, Section V, 2.0, and Section VII, 1.0 of this STP.

Test calls will be placed using resale test lines provisioned and configured in accordance with test scenarios. Testers will be provided with test scripts that will encompass a broad variety of call types, destinations, billing options, and call placement procedures (direct dialing, operator assisted, etc.). Testers log all calls and attendant call details such as the call to number, bill to number, origination time, and call duration.

KPMG will examine the accuracy and completeness with which usage messages were captured and recorded, based on a comparison of the call details logged by the testers at the time the usage was generated, and the records contained in the DUFs.

Evaluation of the timeliness of delivery of DUFs will be based on the number of calendar days between the record date (not including the call date) and the date the DUF was created.

2.2 Objectives

The objectives of this test are to determine the accuracy, adequacy, and timeliness of all usage types captured on DUFs. The test will evaluate whether all records that should appear actually do appear and records that should not appear are excluded from the file.

2.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3

Criteria	Responsible Party
Test bed completed and ready	BLS
Product descriptions and business rules for all transactions to be tested are available	BLS, KPMG
Techniques and instrumentation developed and approved	KPMG
Inter-Connection Agreement obtained from BLS	BLS, KPMG
BLS resources are available to participate in test	BLS
Detailed test plan completed and approved	KPMG

2.4 Test Scope

Table VII-2 Test Target: Usage Processing

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Reporting of Usage	Track usage	Completeness	Inspection	Quantitative
	Verify usage data	Completeness and accuracy of data	Inspection	Quantitative
	Verify no empty set files	Completeness and accuracy of data	Inspection	Quantitative
Receipt of Usage	Verify Header/Trailer record counts	Completenss of data	Inspection	Quantitative
	Track receipt of files	Timeliness of DUF files and recors	Inspection	Quantitative

2.5 Test Approach

This transaction-driven evaluation will be based on test calls made by KPMG testers who will be dispatched to various locations within the state of Georgia. One tester will be located outside of Georgia to facilitate the receipt of incoming interstate calls. Test calls will be made using test bed accounts with varying line configurations and services, and which are served from multiple switch types. Calls will be comprised of various types and varying duration as determined by KPMG. Call details will be recorded on Tester Logs and will be compared to DUF records.

Calls will include incoming and outgoing intraLATA, interLATA, and international calls. Calls will be placed using the following methods: direct dial, calling card, full and partial operator assisted collect, third party, interrupts, busy verification, credit requests, as well as calls placed using Phonesmart and Custom Calling features.

DUF transmissions will be examined to ensure header and trailer record count information corresponds with the number of records contained within the file. The date the record was created will be logged and compared to the call origination date to evaluate the timeliness with which the record was created.

2.5.1 Inputs

1. Test scenarios

KPMG Consulting

2. Test case execution

3. Test criteria

4. Detailed test plan

2.5.2 Activities

1. Develop Call Matrices, which include test call scripts for each location for each tester

2. Assemble tester resources, provide instructions and dispatch testers to calling locations

3. Complete calls and logs

4. Develop expected results for each test case

5. Verify DUF Header/Trailer counts are correct

6. Record "create date" and age of record

7. Validate DUF records

8. Check for empty set files

9. Identify discrepancies

10. Document findings

2.5.3 Outputs

1. Call Log Report

2. DUF Accuracy and Completeness Report

3. Empty DUF Files Report

4. DUF Timeliness Report

5. Final Report

2.6 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

VIII. Change Management Test Section

A. Purpose

The purpose of this section is to define the specific Change Management tests to be undertaken in evaluating the systems and related operational elements affected by BLS's OSS '99 release. Additional evaluations of Change Management methods and procedures related to BLS's OSS are described in *BellSouth – Georgia OSS Evaluation Master Test Plan, Change Management Practices Review (CM-1)*.

B. Organization

The Change Management "Scope" section contains a table that identifies the types of tests to be associated with the Target Test Area.

The subsequent section, Change Management "Test Process," provides additional information and a table that further define the testing approach, inputs, outputs, as well as entrance and exit criteria.

C. Scope

This Change Management Test consists of a Target Test Area, the OSS '99 Release Evaluation, representing a significant effort undertaken by BLS to support the CLEC wholesale relationship.

The Target Test Area is further broken down into a number of increasingly discrete Process and Sub Process Areas that serve to identify the particular area of interest under test.

Table VIII-1 Test Target: OSS '99 Release Evaluation

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Change Management: OSS '99 Release Evaluation	Implementing Change	Adequacy and completeness of change implementation process	Inspection Document review Report Review	Qualitative
	Documentation	Adequacy, accuracy, completeness, and timeliness of release documentation	Inspection Document review Report review	Qualitative
	Availability of Functioning Test Environments	Availability of functioning test environments for all supported interfaces	Inspection Document review Report review	Qualitative
	Provision of Support for Interface Testing	Availability and documentation of provision of support for interface testing	Inspection Document review Report review	Qualitative

D. Test Process

A test process has been designed to address the test target area.

1.0 Test CM2: OSS '99 Release Evaluation

1.1 Description

This test evaluates methods and procedures used by BLS to develop and release the OSS '99 applications package and supporting documentation. This test will rely on checklists and inspections.

The OSS '99 applications package includes enhancements to CLEC interfaces that affect the following operational activities:

- Pre-Ordering

- Ordering

1.2 Objectives

The objective of this test is to determine the adequacy and completeness of key BLS processes for developing and releasing system documentation and related support material.

1.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
Interview guides/questionnaire developed	KPMG
Interviewees identified and scheduled	BLS, KPMG
Detailed evaluation checklists completed	KPMG

1.4 Test Scope

Table VIII-2 Test Target: OSS '99 Release Evaluation

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
Change Management: OSS '99 Release Evaluation	Implementing Change	Adequacy and completeness of change implementation process	Inspection Document review Report Review	Qualitative
	Documentation	Adequacy, accuracy, completeness, and timeliness of release documentation	Inspection Document review Report review	Qualitative
	Availability of Functioning Test Environments	Availability of functioning test environments for all supported interfaces	Inspection Document review Report review	Qualitative

Table VIII-2 Test Target: OSS '99 Release Evaluation

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
	Provision of Support for Interface Testing	Availability and documentation of provision of support for interface testing	Inspection Document review Report review	Qualitative

1.5 Scenarios

This test does not rely on scenarios.

1.6 Test Approach

1.6.1 Inputs

1. Electronic Interface Change Control Process (EICCP) documentation
2. Other procedural and technical documentation
3. Evaluation checklists
4. Interview guides

1.6.2 Activities

1. Gather documentation
2. Perform interviews and documentation reviews
3. Complete evaluation checklists and interview summaries
4. Develop and document findings

1.6.3 Outputs

1. Completed evaluation checklists and interview summaries
2. Comparison of actual versus expected results for interface development deliverables (as defined in the Electronic Interface Change Control Process)
3. Summary report

1.7 Exit Criteria

Criteria	Responsible Party
Limited to Global Exit Criteria requirements	See Table III-4

Appendix A: Statistical Approach

A. Overview

This test will rely on standard statistical methods to evaluate BLS performance. Each test will define the data population to be observed, the measurements to be taken, and the statistical tests to be used. Data will be normalized, tabulated, and archived in a way that allows verification of test results and re-analysis of data using additional statistical methods, if appropriate.

B. Metrics

The metrics (Service Quality Measurements and generic associated standards) that will serve as parameters for testing are listed in Appendix D-2 in the *BellSouth – Georgia OSS Evaluation Master Test Plan*.

C. Sampling

In instances where sampling is used, sampling will be designed so that samples are sufficiently representative of populations with respect to the measures being studied to ensure that the resulting statistical inferences made about populations are valid. For most tests, simple random sampling will be used.

D. Hypothesis Testing

This test will employ a hypothesis testing approach to frame the analysis of test results. The standard "null" hypothesis will be that BLS is meeting the established standard (i.e., performing adequately). The possibility of an error arises if this hypothesis is rejected when the hypothesis is, in fact, true (Type I error) or is accepted when the hypothesis is, in fact, false (Type II error). An attempt will be made to balance Type I and Type II errors as much as is feasible.

E. Parity Tests and Benchmark Tests

There are two basic types of tests. Parity tests compare a BLS retail average or percentage to a CLEC or test transaction average or percentage. The typical test for this type of comparison is a hypergeometric test for percentages and a two-sample t-test or z-test for averages. For those parity tests where sufficiently large samples can be drawn, hypothesis testing will be done by performing a "z-test" to calculate a "z-score." A z-score is a single number, which indicates the differences between sample data. A low z-score supports the hypothesis of parity (i.e., both CLEC and ILEC performance are from the same "population" in terms of performance). In cases where this test is not appropriate due to small sample size (for tests of averages) or assumption violations, other tests, such as permutation tests, will be performed.

Benchmark tests compare a percentage or average to a fixed standard or benchmark. In this case, the typical test is a binomial test or a one-sample t-test. Once again, alternative statistical tests will be used, where appropriate, based on tests of assumptions and sample sizes.

F. Results

Test results will include a summary of the statistics calculated, the hypotheses postulated for the test, and the conclusion(s) drawn based on the statistical results.

Appendix B: Resale Products for Functional Evaluation

A. Overview

The January 12, 2000 GAPSC Order specified that BLS should perform testing only of the top 50 retail services available for resale that are electronically orderable and that have not experienced significant commercial usage. The GAPSC required that the STP include the order volumes for these services.

B. Proposed Products and Services for Evaluation

The table below lists the top 50 BLS retail services and features made available for resale, based on number of units in service. The order volume via fax, LENS, TAG, and EDI, where applicable, is presented for each type of service. Products and features that, based on BLS assessment, are ordered by CLECs in volumes that represent significant commercial usage are indicated with an "X." After reviewing the data provided by BellSouth in Exhibits 1 and 3 of the February 7, 2000 BellSouth filing, along with additional requisition type and activity type data requested by KPMG, we are unable to make a recommendation to the Commission on whether the information supports evidence of commercial usage at a service level by interface. KPMG believes our ability to comment on whether or not the data provided by BellSouth is evidence of commercial usage, and an acceptable CLEC experience underlying the generation of the transaction volumes, would require interviews with CLECs and analysis of actual CLEC orders supporting the transaction and in-service unit data.

Due to difficulties inherent in this historical data review, KPMG recommends to the Commission, with the concurrence of BellSouth, that all electronically orderable retail services made available for resale be independently tested for pre-ordering, ordering, provisioning, maintenance and repair, and billing, as appropriate.

(Table to be provided by BellSouth)

C. Analysis and Commentary

KPMG will conduct an analysis of the order volumes presented in this table to make an independent determination of which products and features it believes have significant commercial usage. In conducting its analysis, KPMG will consider BLS's proposal as well as GAPSC and CLEC comments on the proposal. KPMG's analysis will be provided to BLS and to all parties of record in Docket No. 8354-U, with sufficient period for comment prior to publication of the final STP.

Appendix C: Test Scenarios

The scenarios listed in this appendix are based on a current understanding of the products and capabilities that are likely to be available at the time the test is executed. Depending on changes in availability, the scenarios may need to be modified before the test begins.

Resale

Activity	Res. POTS	Bus. POTS	Res. ISDN -BRI	Bus. ISDN -BRI	PBX	Syn-chronet
Migration from BLS "as is"	X	X	X	X	X	
CLEC to CLEC migration	X	X				
Feature changes to existing customer	X	X				
Migration from BLS "as specified"	X	X	X	X		X
New customer	X	X	X	X	X	X
Telephone number change	X	X				
Directory change	X	X				
Add lines/trunks/ circuits	X	X	X	X	X	
Suspend/restore service	X	X				
Disconnect (full and partial)	X	X	X	X	X	X
Moves (inside and outside)	X	X				
Convert line to ISDN			X	X		
Migrate from CLEC to BLS	X	X				

Note: Scenarios will include variations such as planned errors and supplements to cancel, change an order, or revise due dates.

xDSL

Activity	Res. xDSL Capable Loop	Bus. xDSL Capable Loop
Migration from BST to CLEC	X	X
Add new loops to existing customer	X	X
Purchase loops for a new customer	X	X
Disconnect (full and partial)	X	X

Note: Scenarios will be developed to support testing of the SOEG application.

KPMG

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March 3, 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 Consulting LLC's Interim Status Report, dated March 3, 2000 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

1.0 Document Objective

In this document, KPMG provides an interim summary status report on developments related to the BellSouth-GA OSS Testing Project. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A more detailed report on specific test items from the Master Test Plan is provided in the table in section 4.0. A more detailed report on specific test items from the Supplemental Test Plan is provided in the table in section 5.0. Each item presented in the tables in sections 4.0 and 5.0 includes a reference number that identifies the item from a previous status report, where applicable.

2.0 Key Developments

- Pre-Order and Order Transaction Testing: KPMG has submitted approximately 75% of planned orders for EDI and TAG functional testing. KPMG has submitted approximately 85% of planned pre-orders via TAG.

- Pre-Order and Order Volume testing: Based on the recent market events in New York, KPMG held a conference call on March 2, 2000 to solicit CLEC input regarding volume projections. CLECs were queried on ordering forecasts and other relevant market information across the BellSouth nine-state region in order to validate KPMG's volume test transaction levels.

- Billing Testing: KPMG has completed the following Billing tests: BLG-1: CRIS/CABS Invoicing Functional Test, BLG-2: ODUF/ADUF Usage Functional Test, BLG-5: CRIS/CABS Invoicing Documentation Evaluation, and BLG-6: ODUF/ADUF Documentation Evaluation. KPMG is currently drafting final reports for these tests.

- Performance results comparison: KPMG has substantially completed the process of replicating the calculations of PMAP-generated SQMs for the KPMG CLEC, for the month of December.

- Maintenance and Repair testing:

  - KPMG has completed the following M&R tests: M&R-1: TAFI Functional Test, M&R-2: ECTA Functional Test, M&R-3: ECTA Normal Volume Performance Test, M&R-4: ECTA Peak Volume Performance Test, and M&R-8: TAFI Documentation Evaluation. KPMG is currently drafting final reports for these tests.

  - ECTA Documentation Testing is 90% complete. KPMG has reviewed one generic and two CLEC-specific *Joint Implementation Agreements.*

- End-To-End Testing is 90% complete. A test of ISDN-BRI lines was conducted. Results are now being incorporated into the end-to-end testing analysis.

- Capacity Management testing: KPMG has completed the following Capacity Management tests: PRE-6: Pre-Order Processing Systems Capacity Management Evaluation, O&P-6: Order Processing Systems Capacity Management Evaluation, BLG-3: Billing Systems Capacity Management Evaluation, M&R-5: TAFI Capacity Management Evaluation, and M&R-6: ECTA Capacity Management Evaluation. KPMG is currently drafting final reports for these tests.

On March 2, 2000, KPMG and BellSouth filed the *BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan, Draft Version 1.1* (STP), with the Georgia Public Service Commission. The *STP* incorporates CLEC comments received by KPMG. KPMG will receive written comments from CLECs on the *STP* through March 6, 2000.

3.0 Key Upcoming Activities

- KPMG will file the next interim status report during the week of March 27th, 2000.

4.0 Master Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step Resolution
I-2	Test bed development	• Provisioning and validation of the order/pre-order test bed is 100% complete, based on initial requirements.	• A number of test bed specifications must be changed to: a) reflect that ISDN-to-UNE and Centrex-to-UNE conversions are not electronically orderable; and b) support INP service requests. Provisioning and validation of these accounts is 79% complete.	• BLS is working on provisioning the remaining ISDN, CENTREX, and INP accounts.
		• Provisioning and validation of the LNP test bed is 97% complete.	• KPMG has experienced a delay in receiving LNP CSRs from BLS.	• BLS expects to return the remaining LNP CSRs by 3/6/00.
		• Provisioning and validation of the RSIMMS volume test bed (for use in normal/peak volume tests) is 100% complete.	• 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.	• BLS provides daily CSR replacements for accounts no longer meeting KPMG's original requirements.
I-6	EDI functional testing	• KPMG is proceeding with EDI functional testing for all UNE product types. Approximately 75% of planned orders have been submitted.	• KPMG uncovered the following: 1) A BLS system limitation with respect to UNE Loop partial migrations; 2) A constraint with respect to ordering Directory Listings (DL) with UNE Loops service requests; Loop and DL service cannot be ordered on the same service request; 3) BLS Due Dates (DD) returned on a service request confirmation are not meeting KPMG's Desired Due Date (DDD) in approximately 20% of service requests; 4) KPMG has received faxed clarifications (CLRs) in response to a small number of electronically-submitted service requests; 5) A problem with the delivery of timely Completion Notices (CNs); 6) The absence of	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.

Ref	Item	Status	Issues	Next Step Resolution
			adequate documentation on the BLS process for returning Status messages on confirmed service requests; 7) An increasing number of inaccurate or erroneous CLRs generated by BLS ordering representatives; 8) A BLS system problem handling coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests; BLS indicated that a system fix was implemented to conform to documented BLS business rules. KPMG continues to receive error messages indicating a DFDT is required for all coordinated hot cuts.	
			• KPMG is researching the following: 1) A potential BLS system problem in consistently returning Missed Appointment (MA) notices in response to service requests that could not be provisioned on the due date (as a result of CLEC or BLS readiness issues); 2) A potential TAG system problem with accepting two-word entries in the BILL CITY data element; 3) A potential BLS system problem resulting in the inability to perform order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS); 4) A potential BLS documentation problem with Directory Listing field requirements.	• KPMG and BLS are working to investigate and resolve these issues.

Ref	Item	Status	Issues	Next Step Resolution
		• BLS informed KPMG that ISDN-to-UNE and CENTREX-to-UNE migrations are supported for migrations to UNE Loops only. BLS does not have documentation to support this order type.	• KPMG has submitted a revised set of test bed specifications to BLS.	• When appropriate documentation is provided to CLECs, KPMG will begin submitting service requests for ISDN-to-UNE and CENTREX-to-UNE Loop migrations.
		• BLS implemented a system fix to correct a problem with 'Outside Move' orders identified during resale validity testing. KPMG successfully re-tested this order type.	• None.	• N/A.
I-7	TAG functional testing	• KPMG is proceeding with TAG functional testing for all UNE product types. Approximately 75% of planned orders have been submitted.	• KPMG uncovered the following: 1) A BLS system limitation with respect to UNE Loop partial migrations; 2) A constraint with respect to ordering Directory Listings (DL) with UNE Loops service requests. Loop and DL service cannot be ordered on the same service request; 3) BLS Due Dates (DD) returned on a service request confirmation are not meeting KPMG's Desired Due Date (DDD) in approximately 20% of service requests; 4) KPMG has received faxed clarifications (CLRs) in response to a small number of electronically-submitted service requests; 5) A problem with the delivery of timely Completion Notices (CNs); 6) The absence of adequate documentation on the BLS process for returning Status messages on confirmed service requests; 7) An increasing number of inaccurate or erroneous CLRs generated by BLS ordering representatives; 8) A BLS	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.

Ref	Item	Status	Issues	Next Step Resolution
			system problem handling coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests. BLS indicated that a system fix was implemented to conform to documented BLS business rules; KPMG continues to receive error messages indicating a DFDT is required for all coordinated hot cuts.	
			• KPMG is researching the following: 1) A potential BLS system problem in consistently returning Missed Appointment (MA) notices in response to service requests that could not be provisioned on the due date (as a result of CLEC or BLS readiness issues); 2) A potential BLS system problem resulting in the inability to perform order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS); 3) A potential BLS documentation problem with Directory Listing field requirements.	• KPMG and BLS are working to investigate and resolve these issues.
		• BLS has informed KPMG that ISDN-to-UNE and CENTREX-to-UNE migrations are supported for migrations to UNE Loops only. BLS does not have documentation to support this order type.	• KPMG has submitted a revised set of test bed specifications to BLS.	• When appropriate documentation is provide to CLECs, KPMG will begin submitting service requests for ISDN-to-UNE and CENTREX-to-UNE Loop migrations.

Ref[1]	Item	Status	Issues	Next Step Resolution
		• BLS implemented a system fix to correct a problem with 'Outside Move' orders identified during resale validity testing. KPMG successfully re-tested this order type.	• None.	• N/A.
		• Approximately 85% of planned TAG pre-orders have been submitted.	• KPMG uncovered the following: 1) A problem with the timeliness of pre-order responses; 2) BLS's pre-order business rules do not contain information on the inputs or outputs for Calculate Due Date (CDD) pre-order queries.	• BLS is working to address these issues.
I-8	CRIS/CABS Invoicing Functional Test	• KPMG has completed validation of UNE bills and is analyzing the results.	• KPMG filed Exception[2] 16 with the GA-PSC, indicating that BLS issued multiple bills containing erroneous information to the KPMG CLEC.	• KPMG expects BLS to provide an amended response to this exception. Subsequent to evaluating BLS's amended response, KPMG will engage in re-testing activities.
		• KPMG has completed BLG-1: CRIS/CABS Invoicing Functional Test.	• None.	• KPMG is preparing a final test report detailing its findings.
II-1	Metrics	• KPMG is updating the calculation validation programs to apply to November and January PMAP-generated SQM values for the KPMG CLEC.	• KPMG has found some potential discrepancies between the values KPMG calculated and values reported by BLS.	• KPMG is investigating these potential discrepancies with BLS.
		• KPMG continues to investigate the discrepancies found as a result of replication of the majority of October and November non-PMAP-generated SQM values for the CLEC aggregate.	• KPMG found some discrepancies between the values KPMG calculated and values reported by BLS.	• KPMG forwarded a draft exception to BLS. BLS provided KPMG an initial response to this draft exception. KPMG expects to file this draft exception with the GA-PSC on 3/06/00. KPMG and BLS are currently investigating the issues raised in this exception.

Ref	Item	Status	Issues	Next Step Resolution
II-4	Volume test	• KPMG continues to submit sample Resale and UNE test cases into the RSIMMS environment to test connectivity and transaction tracking capabilities.	• A lack of facilities information and dynamic test bed accounts have limited progress.	• BLS is working to provide KPMG the required resources to complete preparation for the test.
		• KPMG is preparing to test LNP functionality in the RSIMMS environment.	• None.	• KPMG expects to perform this test during the week of 3/06/00.
		• KPMG was unable to successfully submit SL2 orders into the RSIMMS test environment.	• BOCABS was not connected to the RSIMMS environment.	• BLS recently added BOCABS to the RSIMMS environment. KPMG expects to test this functionality during the week of 3/06/00.
		• The RSIMMS environment does not have auto reply functionality (the capability to accept functional acknowledgments generated by a CLEC).	• Transactions may be lost during testing if a CLEC's system is temporarily down.	• BLS is adding auto reply to the RSIMMS environment.
II-5	Change management	• KPMG attended BLS's Change Control Steering Committee workshop on 2/16 and 2/17/00. During this workshop, the five participating CLECs provided input and recommendations to BLS regarding preparation of a revised change management process. During a follow-up teleconference on 2/29/00, BLS provided CLECs with updates on their recommendations.	• None.	• N/A.

Ref[1]	Item	Status	Issues	Next Step Resolution
		• KPMG has completed document reviews of current BLS change management processes and their posted change notifications.	• KPMG issued an exception on 11/23/99 asserting that BLS's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.	• KPMG expects delivery of BLS's revised formal change management process documentation in early March. KPMG will use this revised documentation to begin re-testing activities for CM-1: Change Management Practices Review.
III-1	Flow-Through Evaluation	• As a result of KPMG's investigation of LSRs that received a "Z" processing status or were reported as flow-through despite falling out after reaching SOCS, KPMG issued Exception[2] 21.	• A small percentage of LSRs reported as flow-through appear to have fallen out after reaching SOCS in each of the months validated.	• Based on flow through changes made by BLS, KPMG expects to perform re-testing activities during the week of March 15th.
		• KPMG reviewed a sample of LSR fallout for correct categorization.	• KPMG posed several questions to BLS SMEs regarding flow-through and order processing.	• BLS is researching the questions raised during the LSR fallout review.
		• KPMG's reconciliation of overall flow-through experienced by CLECs in the nine-state region against BLS reporting is complete.	• None.	• KPMG will incorporate the results of this review into findings for the Flow-Through Evaluation.
		• KPMG met with CLECs to discuss flow through reporting.	• KPMG is researching questions raised during CLEC interviews related to documentation of the flow-through process and access to the flow-through report on the PMAP web page.	• KPMG will incorporate the results of these interviews into findings for the Flow-Through Evaluation.
III-2	CLEC Participation – Ordering	• KPMG is proceeding with UNE-LNP and CLEC-to-CLEC migration orders using CLEC-provided facilities.	• KPMG has uncovered a potential BLS system limitation with performing CLEC-to-CLEC migrations.	• KPMG and BLS are working to investigate and resolve this issue.

Ref[1]	Item	Status	Issues	Next Step Resolution
III-3	Capacity Management	• KPMG reviewed BLS documentation regarding Mainframe CPU Utilization and Trending Graph/Reports, EDI Monthly Volume Reports, EDI Monitoring Procedures Documentation, and Billing application flows.	• None.	• N/A.
		• KPMG has completed PRE-6: Pre-Order Processing Systems Capacity Management Evaluation, O&P-6: Order Processing Systems Capacity Management Evaluation, BLG-3: Billing Systems Capacity Management Evaluation, M&R-5: TAFI Capacity Management Evaluation, and M&R-6: ECTA Capacity Management Evaluation.	• None.	• KPMG is preparing a final test report detailing its findings.
IV-1	TAFI Functional & Documentation Testing	• KPMG has completed M&R-1: TAFI Functional Test.	• None.	• KPMG is preparing a final test report detailing its findings.
		• KPMG has completed M&R-8: TAFI Documentation Evaluation.	• None.	• KPMG is preparing a final test report detailing its findings.
IV-2	ECTA Functional Testing	• KPMG has completed ECTA Functional Testing for the Mechanized Line Test function (MLT).	• None	• N/A.
		• KPMG has completed M&R-2: ECTA Functional Test.	• None.	• KPMG is preparing a final test report detailing its findings.
		• KPMG has completed M&R-3: ECTA Normal Volume Performance Test.	• None.	• KPMG is preparing a final test report detailing its findings.
		• KPMG has completed M&R-4: ECTA Peak Volume Performance Test.	• None.	• KPMG will prepare a final test report detailing its findings.

Ref	Item	Status	Issues	Next Step Resolution
IV-3	ODUF/ADUF Usage Functional Test	• KPMG forwarded several draft exceptions to BLS based on its analysis of test results. KPMG is currently reviewing BLS's responses to these draft exceptions[2].	• KPMG noted several issues, including: 1) Receipt of incorrect DUF records; 2) Failure to deliver 46% of DUF records; 3) Failure to deliver timely DUF records.	• KPMG expects to determine whether to file exceptions with the GA-PSC shortly. KPMG will engage in re-testing activities as necessary.
		• KPMG has completed BLG-2: ODUF/ADUF Usage Functional Test.	• None.	• KPMG is preparing a final test report detailing its findings.
IV-4	CRIS/CABS Invoicing Documentation Evaluation	• KPMG has completed BLG-5: CRIS/CABS Invoicing Documentation Evaluation.	• None.	• KPMG will prepare a final test report detailing its findings.
IV-5	Exceptions[2]	• KPMG's Exception #1, regarding Pre-ordering, will undergo further review based on information which will be provided by BLS.	• KPMG indicated that BLS does not currently provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.	• BLS provided updated business rule documentation on 2/08/00. Business rule information regarding CDD query types was not included in the update. Subsequent to BLS's delivery of pre-order business rules which include CDD query type rules, KPMG will perform re-testing activities.
		• KPMG is awaiting new change management procedures from BLS in order to conduct re-testing of Exception #2, regarding Change Management.	• KPMG indicated that BLS's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.	• BLS is currently reviewing proposed change management procedures with the CLEC community. After completion of this review process, KPMG will begin re-testing activities.

Ref	Item	Status	Issues	Next Step Resolution
		• KPMG filed a closure report for Exception #3, regarding Performance Measurements, with the GA-PSC on 2/25/00.	• KPMG indicated that CLECs are not notified when BLS initiates changes to published historical performance measurement reports and/or raw data files associated with these reports after this information has been removed from the PMAP web site.	• In its closure report, KPMG noted that BLS enhanced its Notification Procedure to include reports that have already been removed from the PMAP web site. This enhancement was documented in the PMAP User's Guide and the web site. Additionally, BLS documented its commitment to respond to all CLEC requests for updated reports within 48 hours. KPMG has suggested that the GA-PSC continue to monitor the site to observe the processing of any change events.
		• KPMG is currently reviewing the initial draft of a closure report for Exception #4, regarding Ordering & Provisioning.	• KPMG indicated that TAG and EDI do not provide the functionality required for submitting partial migration service requests for loop-port combinations.	• In its closure report, KPMG noted that BLS implemented a coding change to address the exception on 1/17/00. In re-testing, KPMG discovered that partial migration service requests for loop-port combinations can now be successfully submitted via TAG and EDI.
		• KPMG filed a closure report for Exception #5, regarding Ordering & Provisioning, with the GA-PSC on 2/25/00.	• KPMG indicated that BLS's rules for submitting supplements to existing service orders are not accurately defined.	• In its closure report, KPMG noted that BLS updated the *Local Exchange Ordering Implementation Guide* to define fields that cannot be changed via a supplement. BLS posted the updated document to its web site on 1/31/00.

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Ref	Item	Status	Issues	Next Step Resolution
		• To address KPMG's Exception #6, regarding Maintenance and Repair, BLS forwarded new TAFI documentation to KPMG on 3/01/00.	• KPMG indicated that multiple instances of inaccuracies in TAFI documentation and deficiencies in distribution of updates have been identified.	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.
		• KPMG is currently reviewing the initial draft of a closure report for Exception #7, regarding Ordering and Provisioning.	• KPMG indicated that the BLS ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.	• In re-testing, KPMG noted that BLS implemented a system fix which allows CLECs to process trouble reports for SL1 circuits. KPMG verified this system fix by re-submitting several trouble reports for SL1 circuits.
		• KPMG filed a closure report for Exception #8, regarding Maintenance and Repair, with the GA-PSC on 2/25/00.	• KPMG indicated that Firm Order Confirmations (FOCs) are issued by BellSouth on CLEC service orders before facility status has been determined.	• In its closure report, KPMG noted that BLS claimed that CLECs receive parity of service with BLS retail customers. Through interviews with BLS personnel, KPMG verified that parity exists.
		• KPMG filed Exception #9, regarding Ordering & Provisioning, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that BellSouth failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.	• Based on BLS's response, KPMG is currently performing re-testing activities. Further action will be predicated on re-testing results, which are expected to be available in mid-March.
		• KPMG filed Exception #10, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described in the *CLEC TAFI End-User Training and User Guide*.	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.
		• KPMG filed Exception #11, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that the host request error and reset communications functions do not operate as described in the *CLEC TAFI End-User Training and User Guide*.	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.

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Ref[1]	Item	Status	Issues	Next Step Resolution
		• KPMG filed Exception #12, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.	• BLS expects to implement a system fix in the new version of ECTA scheduled to be released on 4/14/00. KPMG will perform re-testing activities subsequent to this release.
		• KPMG filed Exception #13, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities. KPMG will complete re-testing activities after BLS performs necessary system edits.
		• KPMG filed Exception #14, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that BLS TAFI applications do not allow CLECs to process trouble reports for ISDN lines as described in the *CLEC TAFI End-User Training and User Guide*.	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.
		• KPMG is currently reviewing the initial draft of a closure report for Exception #15, regarding Maintenance & Repair.	• KPMG indicated that under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.	• KPMG filed Exception[2] 15 and BLS's response with the GA-PSC on 2/17/00. Exception 15 occurred due to BLS system purges occurring once every 30 days. In response, BLS now purges the relevant system every two days.
		• KPMG filed Exception #16, regarding Billing, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BellSouth issued multiple bills containing erroneous information to KPMG.	• KPMG expects BLS to provide an amended response to this exception. Subsequent to evaluating BLS's amended response, KPMG will engage in re-testing activities.

Ref	Item	Status	Issues	Next Step Resolution
		• KPMG filed Exception #17, regarding Change Management, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BLS's change management process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site allows for defects in postings.	• KPMG expects BLS to develop a plan to address this exception. Subsequently, KPMG will engage in re-testing activities.
		• KPMG filed Exception #18, regarding Ordering and Provisioning, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BLS's requirements for values entered in the Line Class of Service data element for EDI and TAG are not consistent, and the documentation is incomplete.	• KPMG expects BLS to provide an amended response to this exception. Subsequent to evaluating BLS's amended response, KPMG will engage in re-testing activities.
		• KPMG filed Exception #19, regarding Metrics, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BLS does not adequately document changes in versions of the BLS Service Quality Measurements Performance Reports.	• On 3/01, BLS published two versions of the SQM Performance Reports, one "clean" version and one with changes shown. BLS will also provide a change summary page, which will detail changes made from previous versions. KPMG will complete re-testing subsequent to the publication of a change summary page.
		• KPMG filed Exception #20, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/25/00. KPMG is currently reviewing the initial draft of a closure report for this exception.	• KPMG indicated that BLS technicians cannot initiate a Verify Repair Completion request.	• BLS instituted a system fix, which allows technicians to initiate a Verify Repair Completion request.

Ref	Item	Status	Issues	Next Step Resolution
		KPMG filed Exception #21, regarding Flow Through, and BLS's response with the GA-PSC on 2/25/00.	KPMG indicated that a small percentage of Local Service Requests (LSRs) were improperly categorized for Percent Flow Through Service Request Reports.	BLS has indicated that a system fix has been implemented to address this exception. KPMG expects to perform re-testing activities in mid-March, subsequent to the release of the February Flow Through report.
		KPMG filed Exception #22, regarding Ordering & Provisioning, and BLS's response with the GA-PSC on 2/25/00.	KPMG indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.	BLS indicated that a system fix was implemented in late February. Subsequently, during re-testing, KPMG discovered that a related error occurred. KPMG provided the PON of this particular service order to BLS for investigation.
		KPMG submitted a Draft Exception, regarding Metrics, to BLS on 2/15/00.	KPMG indicated that it cannot replicate five of BellSouth's reported Service Quality Measurements.	BLS forwarded an initial response to KPMG on 2/21/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.
		KPMG submitted a Draft Exception, regarding Billing, to BLS on 2/16/00.	KPMG indicated that BLS failed to deliver 46% of expected DUF records to KPMG.	BLS forwarded an initial response to KPMG on 2/24/00. KPMG expects to file this exception with the GA-PSC during the week of 3/06/00.
		KPMG submitted a Draft Exception, regarding Capacity Management, to BLS on 2/16/00.	KPMG indicated that BLS's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.	BLS forwarded an initial response to KPMG on 2/24/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.
		KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 2/16/00. h	KPMG indicated that BLS does not deliver timely Completion Notices (CNs).	BLS forwarded an initial response to KPMG on 2/24/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.

Ref	Item	Status	Issues	Next Step Resolution
		• KPMG submitted a Draft Exception, regarding Pre-Ordering, to BLS on 2/22/00.	• KPMG indicated that BLS's TAG API does not deliver timely responses to pre-order transactions.	• BLS forwarded an initial response to KPMG on 2/28/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 2/22/00.	• KPMG indicated that BLS did not deliver timely DUF records to KPMG.	• BLS forwarded an initial response to KPMG on 2/28/00. KPMG is currently evaluating BLS's response.
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 2/23/00.	• KPMG indicated that BLS provided incorrect DUF records to KPMG.	• BLS forwarded an initial response to KPMG on 2/28/00. KPMG is currently evaluating BLS's response.
V-1	Maintenance and Repair End-To-End Functional Testing	• KPMG has completed a test of ISDN-BRI lines.	• None.	• KPMG is incorporating the results into its end-to-end testing analysis.
V-2	Provisioning Verification	• KPMG has completed interviews with BellSouth Personnel to understand the provisioning process.	• None.	• N/A.
		• KPMG has conducted interviews with AT&T, ITC DeltaCom, and NextLink to examine provisioning from the CLEC Perspective.	• None.	• KPMG is scheduling additional interviews with CLECs.
		• KPMG is continuing provisioning verification activities for transactions initiated during TAG and EDI functional testing.	• Verification activities include site inspections, validation of switch translations, DL confirmation, LNP confirmation, and post-activity CSR runs by BLS personnel.	• Verification activities will continue through the completion of EDI and TAG functional testing.

Ref	Item	Status	Issues	Next Step Resolution
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	• KPMG has instituted a test process whereby the *BLS Documentation Issues Report* is submitted to BLS representatives. The report is then reviewed and updated via a weekly conference call.	• KPMG uncovered the following: 1) Potential documentation problems relating to ordering SL1 and SL2 loops using BI1, BAN1, BI2 and BAN2; 2) Potential problems with requirements for the LOCBAN field for loop migrations	• KPMG and BLS continue to research these issues.
		• KPMG has conducted interviews with CLEC personnel to understand BLS documentation clarity, accuracy and availability from the CLEC perspective.	• None.	• N.A.
		• KPMG has completed a review of the *LEO Guide, Volume 1, Version N* and is analyzing the results.	• KPMG noted several problems during its review of the *LEO Guide, Volume 1, Version N*.	• Reference VII-1 of this report – "*Local Exchange Ordering (LEO) Guide* Documentation Issues" - details problems raised by KPMG which BLS will address in the subsequent issue of the *LEO Guide, Version 7O*.
V-4	ODUF/ADUF Documentation Evaluation	• KPMG has completed BLG-6: ODUF/ADUF Documentation Evaluation.	• None.	• KPMG will prepare a final test report detailing its findings.
VII-1	*Local Exchange Ordering (LEO) Guide Documentation Issues*	• Data Element Definition: *Reference Number*	• In the Directory Listings Service form, the field REFNUM reflects only Req Type J as required. An error message is received if the field is not populated.	• In *LEO Guide, Version 7O*, the REFNUM matrix will be revised, and REFNUM will be listed as "001" on LN.
		• Data Element Definition: *Transfer of Calls to Primary Number, Transfer of Calls to Secondary Number*	• The LOOP w/NP, TCTO-Primary and TCTO-Secondary fields are shown as N/A for all REQTYP/ACT. However, Note 1 states it is required when "TC OPT=21, 31, or 81", which indicates these fields are conditional.	• In *LEO Guide, Version 7O*, a note will be added which will detail: 1) These fields are conditional for interim number portability – for ReqTyp B Activity Types, A, C, D, MT, T, R, SS, RS, W; 2) These fields are prohibited for ReqType V at line level.

Ref[1]	Item	Status	Issues	Next Step Resolution
		Data Element Definition: *Transfer of Calls to Primary Name, Transfer of Calls to Secondary Name*	• The LOOP w/NP, TCTO-Primary and TCTO-Secondary fields are shown as N/A for all REQTYP/ACT. However, Note 1 states it is required when "TC OPT=21, 31, or 81", which indicates these fields are conditional.	• In *LEO Guide, Version 7O,* a note will be added which will detail: 1) These fields are conditional for interim number portability – for ReqTyp B Activity Types, A, C, D, MT, T, R, SS, RS, W; 2) These fields are prohibited for ReqType V at line level.
		Data Element Definition: *Transfer of Calls Period Century Code/Transfer of Calls Period Date*	• The LOOP w/NP, TCTO-Primary and TCTO-Secondary fields are shown as N/A for all REQTYP/ACT. However, Note 1 states it is required when "TC OPT=21, 31, or 81", which indicates these fields are conditional.	• In *LEO Guide, Version 7O,* a note will be added which will detail: 1) These fields are conditional for interim number portability – for ReqTyp B Activity Types, A, C, D, MT, T, R, SS, RS, W; 2) These fields are prohibited for ReqType V at line level.
		Data Element Definition: *Design Routing Code*	• The LSR form, DRC for ReqType A Activity V, Note 2 states that "this field is applicable when the service is designed." For SL2 orders, the code then must be entered. BSL informed KPMG that this field is not necessary.	• In *LEO Guide, Version 7O,* a note will be added stating that the DRC is not required to have orders issued.
		Data Element Definition: *Account Name, Account Telephone Number*	• Errors were received on orders submitted following the conditional rules outlined in the documentation. Based on a call to BLS's Help Desk, ATN and EATN fields are required for LNP Full Migration with DL.	• In *LEO Guide, Version 7O,* a note will be added stating ATN and EATN are required for LNP Full Migration when DL Form is populated.
		Data Element Definition: *Requisition Type*	• In the LSR Form, REQTYP is defined as two, 2-alpha characters. Table A defines the first character. No definition of the second character is provided. Per BLS's Help Desk, the second character is always "B".	• In *LEO Guide, Version 7O,* a definition will be added that the second character is always "B".

Ref[1]	Item	Status	Issues	Next Step Resolution
		Data Element Definition: *Implementation Contact*	• In the LSR form, ReqType A, Activity type A, the IMPCON field is optional. An error was received stating that this field is required. Per BLS's Help Desk, this field is conditional.	• In *LEO Guide, Version 7O*, this field will be marked as conditional on the LSR form for ReqType A, Activity Type A.

5.0 Supplemental Test Plan Specific Item Status

Ref[1]	Item	Status	Issues	Next Step Resolution
VII-2	Test Bed Development	• Provisioning and validation of the resale test bed is 19% complete.	• KPMG provided BLS with modified test bed specifications.	• BLS will send KPMG the balance of the CSRs matching KPMG's modified specs.
VII-3	Detailed Test Plan Development	• KPMG is currently drafting the TAFI Functional Resale Detailed Test Plan.	• The detailed test plan will be completed subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.
		• KPMG is currently drafting the ECTA Functional Resale Detailed Test Plan.	• The detailed test plan will be completed subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.
		• KPMG is currently drafting the End-to-End xDSL Detailed Test Plan.	• The detailed test plan will be completed subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.
		• KPMG has completed and submitted for peer review the Detailed Test Plan for CM-2: OSS '99 Release Evaluation.	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.
		• KPMG has completed and submitted for peer review the detailed test plan for Work Center Capacity Management (xDSL).	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.

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Ref²	Item	Status	Issues	Next Step Resolution
		• KPMG has completed and submitted for peer review the detailed test plan for ADSL Systems Capacity Management.	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• After the STP receives final approval from the GA-PSC, KPMG will complete the detailed test plan and begin testing activities.
		• KPMG has completed and submitted for peer review the detailed test plan for xDSL.	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• After the STP receives final approval from the GA-PSC, KPMG will complete the detailed test plan and begin testing activities.
VII-4	Metrics	• KPMG is currently replicating the calculations of PMAP-generated and non-PMAP-generated SQMs for the CLEC aggregate and BellSouth retail.	• KPMG is investigating some potential discrepancies between the values calculated by KPMG and the values reported by BLS.	• Based on any subsequent direction from the GA-PSC, KPMG will modify Metrics testing as necessary.
		• KPMG has reviewed the definitions of PMAP-generated and non-PMAP-generated SQMs.	• None.	• Based on any subsequent direction from the GA-PSC, KPMG will modify Metrics testing as necessary.
		• KPMG has reviewed the data flow process through legacy/source, PMAP, and other related BLS systems.	• None.	• Based on any subsequent direction from the GA-PSC, KPMG will modify Metrics testing as necessary.

[1] Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item was first referenced in the October 21, 1999 report. An item referenced as IV-n indicates that the item was first referenced in the November 19, 1999 report. An item referenced as V-n indicates that the item was first referenced in the December 17, 1999 report. No new items were referenced in report VI, dated January 28, 2000. An item referenced as VII-n indicates that this item is new for this report.

[2] According to the exception process agreed to by KPMG, BellSouth and the Georgia Public Service Commission, when KPMG discovers a potential component defect (e.g., a deficiency in a procedure, system or document) written substantiation is submitted to BellSouth detailing KPMG's findings. BellSouth provides a written response to this finding. KPMG's written substantiation is considered a "Draft Exception" until the potential defect has been confirmed. If KPMG's assessment of the potential error is determined to be inaccurate, KPMG will withdraw the Draft Exception. If the issue is substantiated, the Draft Exception and BellSouth response will be submitted to and published by the Commission, and the parties will agree on resolution steps.

<u>CERTIFICATE OF SERVICE</u>
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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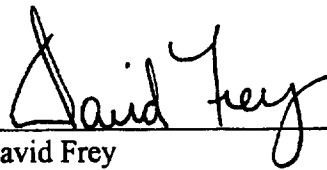Duluth, GA 30096

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This 3rd day of March 2000.

David Frey

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RECEIVED

MAR 0 9 2000

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

March 9, 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**
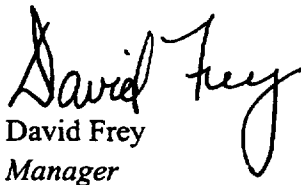
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's Amended Responses to Exceptions 10, 11 and 14 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

⊕ *BELL*SOUTH

February 28, 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 for 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.

BellSouth Response

During conversations with the KPMG tester it was determined that the "status" of the subsequent report (that was removed from queue) was Dispatched Out. By design, TAFI will not allow a dispatched report to be closed since a field technician is in control of the report. The user can update the existing report by providing additional narrative info (i.e., OK now) for the field technician to see. The updated training documentation will discuss this capability.

The procedure for processing multiple trouble reports has been mechanized in TAFI. The updated *CLEC TAFI End-User Training and User Guide*, which will be updated 3/1/00, will reflect the proper procedure for closing these reports.

Reviewing the data for Multiple Trouble Reports revealed that the telephone numbers used (706-828-3264 and 706-828-3451) are UNE Ports and not POTS lines. UNE Ports are designed services supported in WFA, not LMOS. TAFI correctly provided the message "take trouble in GA WFA-C" but then allowed the tester to continue processing a LMOS report.

The process of creating the multiple trouble reports according to the out dated documentation worked to the extent of applying the MTR handle code. This, along with the narrative entry, alerts the field personnel of multiple reports in the same location. However, this process does not 'link' the multiple reports together in LMOS. Therefore, when the tester attempted to close the report by answering "yes" to TAFI's question, TAFI noticed that the given report was not 'linked' to the other report and correctly only updated the report as opposed to closing it.

Today, the first report of a multiple report situation becomes the 'parent' and all additional reports at that location become 'children' linked to the parent. Subsequent report processing is performed on the parent report and all the children benefit (as long as the LMOS link is there).

Note: The tester documentation indicated that when they saw the TAFI recommendation to update the narrative (as opposed to closing the report), they depressed F12 and selected the 'Cancel – User Initiated option'. This operation only cancels the TAFI transaction and does not impact the existing LMOS report. Once a report is entered into LMOS, the only possible outcome is to close the report either to the appropriate disposition and cause code or exclude the report.

⊕ *BELL*SOUTH

February 28, 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.

BellSouth Response

Reset Communications is no longer a valid option since TAFI converted to Navigator contracts for accessing legacy system data. References to this option are deleted in the revised documentation.

As stated, a Host Request Error indicates that TAFI was not able to secure specific information from a legacy system. This could happen for a number of reasons from the legacy system itself being down; access to the legacy system down; the Navigator contract timed out due to congestion on the network; some transient communications problem; to another user (or process) having accessed the report prior to the TAFI user completing the transaction. The latter example is common for subsequent report processing.

The stated observations, e.g. scenarios, 10C, occurred while the tester was performing a subsequent report transaction. If another user, i.e., screener in the BRMC, accessed the trouble report while the TAFI user was attempting to process the subsequent report, an LMOS Update Error would occur. TAFI would tell the user to wait 5 minutes and try again.

Attempting to duplicate the test, it was observed that a downstream process had control of the report when attempting to send the subsequent report transaction.

```
PEND TRBL PHYS OOSN 'ACN=S-2RWH-Entp--jk or i/w trbl- this is a test report / do
HANDLE PD4      ACCESS: A 0800A B0800P 'test report    ' REACH# 4049792250
CAT CD   STATUS Pending Screen MLT   DT RECVD 02-23-00 0631P
[ SUB REROUTE ]         CUST CALLED 1 IN 1 DAYS      OLD COMM 02-24-00 0700P
```

```
  -                                       REPEAT N   EC 999  UNIT 31600011
                                                              LOC FLR 3:RM 300
        IST code has changed, cancel this    SO Y
        report and reenter to acknowledge
        the new IST code.
                                                        CALLED# _____

     REMARKS test report        OK/ _____      REP BY _____
     TRBL DESC PHYS OOSN ____ ___                   NOTE _____
     NARRATIVE ACN=S-2RWH-Entp--jk or i/w trbl- this is a test r_
               eport / do not dispatch-2R/B gene-svc ord closeou_
        MTR: _ LINK: _____
     NEW COMM 02-24-00 0700P    ACCESS: A 0800A B 0800P      OS 02-24-00 0700P
      CUS DT _____      CAT CX  IRATE N  CC N        AS 02-24-00 0700P
      DT RECVD _____    SUB: CLSALT _ NI N           BC 02-25-00 0700P

     TEST RES _____ HANDLE _____ MISC SR12_____
     RECOMMEND OK NOW CLOSEOUT/SERVICE ORDER _____
                                                        BROUL TYM
LMOS Update Error for 9127509951                        02:08 05:33:39
```

In this case a down stream process changed the status (IST value) of the report before
TAFI sent the subsequent report. Canceling this TAFI transaction and resubmitting the
subsequent report allowed the report to be closed on the second attempt.

If the error was due to problems with a legacy system (or communications), and the user
attempted to re-send the request (i.e., F5), it would fail again (until the legacy problem
was resolved). If the error was due to some transient communications problem, the user
may see a failure to re-send and then TAFI operates properly on the next attempt. The
observed situations appear to be consistent with TAFI's operation.

ⓐ *BELLSOUTH*

February 29, 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 flow[1]. 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* was updated 3/1/00 to reflect the current operation of the system. ISDN lines are not supported by TAFI. A circuit ID identifies this service and, in all states except Georgia, they are managed in WFA. In Georgia, ISDN service is supported in LMOS but it requires circuit ID input (and today, TAFI only accepts telephone number formatted input). In Georgia, CLECs will have to contact the BellSouth Resale Maintenance Center (BRMC) to report their customer's ISDN troubles.

---

[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.

<u>CERTIFICATE OF SERVICE</u>
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 9th day of March 2000.

David Frey

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March 9, 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 Consulting LLC's Exceptions 27, 28 and 29 along 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

Date: February 14, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ADUF/ODUF Functional Usage Evaluation (BLG-2)

Exception:

BellSouth provided incorrect DUF records to KPMG.

During the period of November 18-20, 1999 KPMG completed 846 test calls (for which DUF files were expected) for the ADUF/ODUF Functional Usage Evaluation[1]. As part of the evaluation, BellSouth provided DUF records for these calls. Through evaluation of these DUF records, KPMG has determined that BellSouth provided incorrect DUF records for certain test calls. Incorrect DUF records are categorized here as: 1) Misidentified DUF records; 2) Improper DUF records.

Misidentified DUF Records

KPMG received numerous ODUF records inappropriately identifying toll calls as local calls. EMI industry standards dictate that the Record Identifier 100101 is to be used to identify toll call detail transmitted from the recording entity to the rating entity. BellSouth failed to adhere to the EMI standard. Representative occurrences of errors are detailed below.

Misidentified Toll Calls

Date	Cat.	From Number	To Number	Connect Time
Nov 20	100131	770-933-8170	706-236-9787	09:44
Nov 20	100131	770-933-8526	706-236-9677	10:02
Nov 20	100131	770-933-8170	706-236-9787	13:56
Nov 20	100131	770-933-8526	706-236-9677	08:59
Nov 20	100131	706-236-9677	770-933-8170	09:42
Nov 20	100131	706-236-9787	770-933-8170	13:58
Nov 20	100131	706-236-9677	770-933-8876	10:24
Nov 20	100131	706-236-9677	770-933-8876	14:07
Nov 19	100131	706-236-9677	770-933-8170	11:47
Nov 19	100131	706-236-9677	770-933-8523	15:29

---

[1] Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, directory assistance messages and WATS & 800 service calls.

Improper DUF Records

BLS submitted DUFs for zero-minus[2] calls placed by testers requesting operator assistance in placing inter-LATA calls. DUF records indicate that local BellSouth operators attempted to place these inter-LATA calls. Inter-LATA calls cannot be completed by local operators therefore no attempt should have been made to place the calls and no DUF record should have been created.

The EMI standard contains no provisions for inappropriately attempted calls. BellSouth previously stated its DUF production process conforms to the EMI standard, noting no exceptions. Details of improper DUFs are shown below.

Improper DUF Records

Date	Cat.	From Number	To Number	Connect Time
Nov 19	100101	706-722-2879	912-741-7059	15:18
Nov 19	100101	706-236-9492	706-722-2879	11:31

Impact

Incorrect DUF records impact CLECs in the following ways:

- **Decrease in revenue.** A CLEC receiving incorrect ODUF information will not be able to bill end-user customers correctly for local and toll calls. Likewise, the absence of correct ADUF information will prevent CLEC from billing an inter-exchange carrier correctly. As a result, the CLEC will lose revenue.

- **Decrease in customer satisfaction.** Providing a CLEC with incorrect DUF records will cause the CLEC to incorrectly bill a customer for usage. This will likely result in a decrease in end-user satisfaction.

- **Increase in operating costs.** . Inappropriate charges for operator services may be billed to a CLEC as a result of the creation of inappropriate DUF records. A CLEC receiving improper DUF records will be forced to engage in a protracted reconciliation of billing information. This will result in an increase in labor costs. In addition,

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[2] Zero-minus calls are those placed by dialing zero for operator assistance.

~TRE1A50.DOC

⨀ **BELL**SOUTH

February 25, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ADUF/ODUF Functional
Usage Evaluation (BLG-2)

Exception:

BellSouth provided incorrect DUF records to KPMG.

During the period of November 18-20, 1999 KPMG completed 846 test calls (for which
DUF files were expected) for the ADUF/ODUF Functional Usage Evaluation[1]. As part
of the evaluation, BellSouth provided DUF records for these calls. Through evaluation of
these DUF records, KPMG has determined that BellSouth provided incorrect DUF
records for certain test calls. Incorrect DUF records are categorized here as: 1)
Misidentified DUF records; 2) Improper DUF records.

Misidentified DUF Records

KPMG received numerous ODUF records inappropriately identifying toll calls as local
calls. EMI industry standards dictate that the Record Identifier 100101 is to be used to
identify toll call detail transmitted from the recording entity to the rating entity.
BellSouth failed to adhere to the EMI standard. Representative occurrences of errors are
detailed below.

Misidentified Toll Calls

Date	Cat.	From Number	To Number	Connect Time
Nov 20	100131	770-933-8170	706-236-9787	09:44
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Nov 20	100131	770-933-8170	706-236-9787	13:56
Nov 20	100131	770-933-8526	706-236-9677	08:59
Nov 20	100131	706-236-9677	770-933-8170	09:42
Nov 20	100131	706-236-9787	770-933-8170	13:58
Nov 20	100131	706-236-9677	770-933-8876	10:24
Nov 20	100131	706-236-9677	770-933-8876	14:07
Nov 19	100131	706-236-9677	770-933-8170	11:47
Nov 19	100131	706-236-9677	770-933-8523	15:29

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[1] Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls
originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange
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Improper DUF Records

BLS submitted DUFs for zero-minus[2] calls placed by testers requesting operator assistance in placing inter-LATA calls. DUF records indicate that local BellSouth operators attempted to place these inter-LATA calls. Inter-LATA calls cannot be completed by local operators therefore no attempt should have been made to place the calls and no DUF record should have been created.

The EMI standard contains no provisions for inappropriately attempted calls. BellSouth previously stated its DUF production process conforms to the EMI standard, noting no exceptions. Details of improper DUFs are shown below.

Improper DUF Records

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Impact

Incorrect DUF records impact CLECs in the following ways:

- **Decrease in revenue.** A CLEC receiving incorrect ODUF information will not be able to bill end-user customers correctly for local and toll calls. Likewise, the absence of correct ADUF information will prevent CLEC from billing an inter-exchange carrier correctly. As a result, the CLEC will lose revenue.

- **Decrease in customer satisfaction.** Providing a CLEC with incorrect DUF records will cause the CLEC to incorrectly bill a customer for usage. This will likely result in a decrease in end-user satisfaction.

- **Increase in operating costs.** . Inappropriate charges for operator services may be billed to a CLEC as a result of the creation of inappropriate DUF records. A CLEC receiving improper DUF records will be forced to engage in a protracted reconciliation of billing information This will result in an increase in labor costs. In addition,

BellSouth Response

Misidentified Toll Calls

BellSouth agrees with KPMG that 10-01-01 records are used for toll calls, and 10-01-31 EMI records are used for local calls. The calls in this category listed above were sent as

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[2] Zero-minus calls are those placed by dialing zero for operator assistance.

local calls due to the From and To points falling within the LOCAL measured calling area set in the Tariff. These calls were correctly sent as local records (10-01-31 EMI records) since all Unbundled Switch Ports in BellSouth are treated as a measured class of service. Therefore, all calls originating from UNE Switch Ports that fall within the local measured calling area are recorded and sent as local calls using the 10-01-31 EMI record.

Improper DUF Records

The two calls in this category originated from a UNE Switch Port, and terminated to a BellSouth Operator because they both were Zero-Minus (0-) dialed. Both of the calls were not completed or answered calls, and the EMI records were marked as an Attempt Message by setting Indicator 18 to equal 2 in the 10-01-01 records. BellSouth furnished all Attempt/Incomplete calls that are handled by an operator for any incomplete BellSouth Operator message using a Category 10 EMI record, and not the 11-01-01 EMI record. The purpose of these records is to notify the CLEC that their customer of record used BellSouth Operator Services, and they will be billed an Operator surcharge on their UNE bill. A Category 11 record would not be correct, since Category 11 records are only used for billable Access. There is no billable Access associated with these calls since they were not passed to an Interexchange Carrier, IXC, to complete the call. BellSouth correctly supplied the above two messages as attempt messages using the 10-01-01 EMI record.

Date: February 14, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ODUF/ADUF Functional Evaluation (BLG-2).

Exception:

BellSouth failed to deliver 46% of expected DUF records to KPMG.

KPMG completed 1,017[1] test calls during the ODUF/ADUF Functional Usage Evaluation. BellSouth failed to deliver DUF records for forty-six percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the tables shown below. The list include numerous call types including Calling Card Calls, Information Provider (900) Calls, Local Calls, Directory Assistance Calls, WATS Calls, Long Distance Calls, and Operator Services Calls.

Calling Card Calls

Thirteen completed Calling Card calls were found to have no corresponding DUF record.

Missing Completed Calling Card DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	13:53	603 382-9705	1	770 933-8170
Nov 20	10:35	734 214-0024	1	706 236-9492
Nov 20	10:26	941 454-0643	15	912 741-6728
Nov 18	18:16	770 719-3611	3	912 741-7059
Nov 18	16:31	770 419-4300	2	706 722-2879
Nov 18	16:29	914 763-3670	1	706 236-9677
Nov 18	16:28	912 927-1626	1	706 236-9492
Nov 18	16:27	423 755-4880	18	706 722-6207
Nov 18	16:25	914 763-3670	1	706 236-9677
Nov 18	14:26	703 525-3367	1	770 933-8526
Nov 18	13:23	770 413-9398	1	912 746-7876
Nov 18	13:08	770 719-3611	1	912 746-7876

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[1] 1017 test calls were made resulting in an expectation that 846 calls would have corresponding DUF records. 171 of the test calls made were not billable.

Information Provider Calls

Eight completed Information Provider calls were found to have no corresponding DUF record.

Missing Information Provider DUF Records (All Included)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	13:19	900 680-4400	8	770 933-8170
Nov 20	13:18	900 407-1600	2	770 933-8170
Nov 20	09:15	900 484-7000	1	706 722-4953
Nov 20	10:40	900 786-6600	1	706 236-9492
Nov 18	18:25	900 656-5000	21	912 741-7059
Nov 18	15:25	900 407-1600	1	770 933-8526
Nov 18	15:26	900 656-5000	23	706 236-9677
Nov 18	15:36	900 860-0030	21	706 236-9492

Local Calls

Sixty-eight completed Local calls were found to have no corresponding DUF record.

Missing Local Call DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 18	13:50	404 633-5251	1	770 322-8438
Nov 18	10:25	706 722-4181	1	706 722-6207
Nov 18	10:30	706 722-4955	2	706 722-2879
Nov 18	11:50	770 933-8523	1	770 933-8526
Nov 19	15:14	404 633-5251	2	404 633-3674
Nov 19	09:51	706 236-9492	13	706 236-7042
Nov 19	10:34	706 722-2879	4	706 722-4087
Nov 20	08:39	404 633-5251	3	770 322-8438
Nov 20	10:44	404 633-5740	1	404 633-5809
Nov 20	09:38	706 236-9492	1	706 236-9677
Nov 20	10:08	770 933-8526	1	770 933-8523

Directory Assistance

Fifteen directory assistance ("411" and "NPA 555-1212") calls were found to have no corresponding DUF record.

Missing Directory Assistance DUF Records (Representative List)

Date	Connect Time	From Number	Local / Long Distance	Call Completion
Nov 18	15:00	706 236-9492	Local	Yes
Nov 18	15:10	706 236-9492	Local	Yes
Nov 18	15:25	706 236-9492	LD	Yes
Nov 18	14:53	706 236-9677	Local	Yes
Nov 18	15:01	706 236-9677	LD	Yes
Nov 18	13:55	912 741-5953	LD	Yes
Nov 18	14:13	912 741-5953	Local	Yes
Nov 18	17:13	912 741-7059	Local	No
Nov 18	17:27	912 741-7059	LD	Yes
Nov 19	08:54	706 236-9677	Local	Yes

WATS Calls

Thirty-one completed WATS ("800", "877", "888") calls were found to have no corresponding DUF record.

Missing WATS DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 18	12:07	888 699-2364	1	404 633-5981
Nov 18	15:16	888 255-7669	1	706 236-9677
Nov 18	14:56	800 284-4886	2	770 933-8526
Nov 18	18:29	800 207-4512	1	912 741-6758
Nov 18	13:06	800 888-8000	1	912 746-7876
Nov 19	11:30	800 207-4512	1	404 633-3674
Nov 19	11:40	800 888-4848	2	706 236-9042
Nov 19	10:47	888 820-2265	3	706 722-4181
Nov 19	12:06	888 624-6633	1	706 722-4955
Nov 19	14:36	877 762-2667	1	770 933-8170
Nov 20	10:42	603 382-9705	56	404 633-5251
Nov 20	10:36	800 888-8000	1	706 236-9492

Long Distance Calls

One hundred eighty-five completed long distance calls were found to have no corresponding DUF record.

Missing Long Distance DUF Records (Representative List)

Date	Connect	To	Duration	From
Nov 18	09:33	912 471-9199	1	404 633-5981
Nov 18	17:00	912 741-7059	3	706 722-4181
Nov 18	15:45	770 933-8170	4	706 722-4955
Nov 18	15:57	706 722-4181	3	770 933-8523

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Date	Connect	To	Duration	From
Nov 19	12:06	603 382-9705	3	706 236-9312
Nov 19	09:22	603 382-9705	1	706 236-9677
Nov 19	09:21	603 382-9705	7	706 722-2879
Nov 19	15:07	415 863-8500	1	706 722-4087
Nov 20	10:03	603 382-9705	1	706 722-4953
Nov 20	10:26	912 741-6758	1	770 933-8526
Nov 20	10:02	404 633-5740	1	912 741-4774
Nov 20	09:46	404 633-5740	1	912 741-5953

Impact

Failure to deliver DUF records impacts CLECs in the following ways:

- **Decrease in revenue.** A CLEC not receiving accurate DUF records will not be able to appropriately bill the end-users or inter-exchange carriers, which will decrease revenue.
- **Inaccurate forecasting.** A CLEC will not be able to make accurate usage and revenue projections for its customer base.

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⊕ **BELL**SOUTH

February 24, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ODUF/ADUF Functional Evaluation (BLG-2).

Exception:

BellSouth failed to deliver 46% of expected DUF records to KPMG.

KPMG completed 1,017[1] test calls during the ODUF/ADUF Functional Usage Evaluation. BellSouth failed to deliver DUF records for forty-six percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the tables shown below. The list include numerous call types including Calling Card Calls, Information Provider (900) Calls, Local Calls, Directory Assistance Calls, WATS Calls, Long Distance Calls, and Operator Services Calls.

Calling Card Calls

Thirteen completed Calling Card calls were found to have no corresponding DUF record.

Missing Completed Calling Card DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response
Nov 20	13:53	603 382-9705	1	770 933-8170	Org # Not UNE until 11/26/99. No UNE record should have been expected by KPMG. This call would have been on ADUF.
Nov 20	10:35	734 214-0024	1	706 236-9492	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 20	10:26	941 454-0643	15	912 741-6728	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 18	18:16	770 719-3611	3	912 741-7059	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 18	16:31	770 419-4300	2	706 722-2879	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 18	16:29	914 763-3670	1	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.

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[1] 1017 test calls were made resulting in an expectation that 846 calls would have corresponding DUF records. 171 of the test calls made were not billable.

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response
Nov 18	16:28	912 927-1626	1	706 236-9492	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 18	16:27	423 755-4880	18	706 722-6207	Not UNE until 11/19/99. No UNE record should have been expected by KPMG. This call would have been on ADUF.
Nov 18	16:25	914 763-3670	1	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 18	14:26	703 525-3367	1	770 933-8526 Not UNE until 11/26/99	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 18	13:23	770 413-9398	1	912 746-7876 Org or Term Not UNE (Org is Resale	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.
Nov 18	13:08	770 719-3611	1	912 746-7876	Org and Term Not UNE, both Resale, and this is an interLATA call, so no DUF records should be sent to KPMG

Information Provider Calls

Eight completed Information Provider calls were found to have no corresponding **ADUF** record.

Missing Information Provider DUF Records (All Included)

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response
Nov 20	13:19	900 680-4400	8	770 933-8170	Org # Not UNE until 11/26/99 KPMG should not have expected a record for this call.
Nov 20	13:18	900 407-1600	2	770 933-8170	Org # Not UNE until 11/26/99. KPMG should not have expected a record for this call
Nov 20	09:15	900 484-7000	1	706 722-4953	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 20	10:40	900 786-6600	1	706 236-9492	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	18:25	900 656-5000	21	912 741-7059	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	15:25	900 407-1600	1	770 933-8526	Org # Not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 18	15:26	900 656-5000	23	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	15:36	900 860-0030	21	706 236-9492	Could not find any record of call, and switch recording records were not available due to the age of the calls.

Local Calls

Sixty-eight completed Local calls were found to have no corresponding DUF record.

Missing Local Call DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From	BellSouth Response
Nov 18	13:50	404 633-5251	1	770 322-8438	Orig # Not UNE, Term is, but BellSouth does not send DUF records for Single Network local calls terminating to UNE.
Nov 18	10:25	706 722-4181	1	706 722-6207	Orig # not UNE until 11/19/99. KPMG should not have expected a DUF record for this call.
Nov 18	10:30	706 722-4955	2	706 722-2879	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	11:50	770 933-8523	1	770 933-8526	Org # Not UNE until 11/26/99. KPMG should not have expected a DUF record for this call.
Nov 19	15:14	404 633-5251	2	404 633-3674	Orig # Not UNE until 11/26/99. KPMG should not have expected a DUF record for this call.
Nov 19	09:51	706 236-9492	13	706 236-7042	Cellular Orig to UNE Local call. Currently BellSouth does not send DUF records for Cellular Originated local calls terminating to UNE on the DUF feed. The usage exchange requirements for this type of call is being reassessed by the UNE product team. A terminating access record will be sent to CLECs for these types of calls beginning in April, 2000.
Nov 19	10:34	706 722-2879	4	706 722-4087	Orig # not UNE until 11/26/99. KPMG should not have expected a DUF record for this call.
Nov 20	08:39	404 633-5251	3	770 322-8438	Orig # Not UNE, Term is, but BellSouth does not send DUF records for Single Network local calls terminating to UNE.
Nov 20	10:44	404 633-5740	1	404 633-5809	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 20	09:38	706 236-9492	1	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 20	10:08	770 933-8526	1	770 933-8523	SO NDNP65 in PCX Status, not posted as of 2/21/00. This call is treated as a non-UNE call since the service order is not posted.

Directory Assistance

Fifteen directory assistance ("411" and "NPA 555-1212") calls were found to have no corresponding DUF record.

Missing Directory Assistance DUF Records (Representative List)

Date	Connect Time	From Number	Local / Long Distance	Call Completion	BellSouth Response
Nov 18	15:00	706 236-9492	Local	Yes	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation.
Nov 18	15:10	706 236-9492	Local	Yes	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the

Date	Connect Time	From Number	Local / Long Distance	Call Completion	BellSouth Response
					threshold needed for investigation.
Nov 18	15:25	706 236-9492	LD	Yes	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation.
Nov 18	14:53	706 236-9677	Local	Yes	See Record # 4 sent 11/23/99 below
Nov 18	15:01	706 236-9677	LD	Yes	See Record # 5 sent 11/23/99 below
Nov 18	13:55	912 741-5953	LD	Yes	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	14:13	912 741-5953	Local	Yes	See Record # 5 sent 11/23/99 below
Nov 18	17:13	912 741-7059	Local	No	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation.
Nov 18	17:27	912 741-7059	LD	Yes	Usage erred as a 6M (message dated after disconnect) error code. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation. The record that we based this reply on has a connect:time of 17:21 not 17:27
Nov 19	08:54	706 236-9677	Local	Yes	See Record # 10 sent 11/23/99 below

KPMG Missing DA Records

Number 4 DA Sent 11/23/99

NOTE NO DACC, only a DA record
1001329911181070623696770000670641100000000000000000000014555900003550200063000041000070001000057000000010993030007062369677ROMEGADA   35 00000000010000000000000000

Number 5 DACC Sent 11/23/99
1001329911181070623696770000670641100000000000000000000014595600003590200063000041000070001000057000000010991420007062369677ROMEGADA   35 00000000010000000000000000

1001189911181070623696770001070623270000000000000000000015010000000720200063000041000070001000057000000010990000007062369677ROMEGALOCAL CALL 35 00000000010300000000000000

1001019911181070623696770001070623270000000000000000000015010000000720200063000041000070001000057000000010990000007062369677ROMEGALOCAL CALL 35 00000000010000000000000000

Number 7 DACC Sent on 11/23/99
NOTE: Call dated 11/19 not 11/18. Could this be a KPMG logging error?
1001329911191091274159530000691241100000000000000000000014115900004530200316000041000070001000057000000011330320009127415953MACON

1001189911191091274159530001091247711100000000000000000141253000235002003160000410000700010000
57000000011330000009127415953MACON

1001019911191091274159530001091247711100000000000000000141253000235002003160000410000
70001000057000000011330000009127415953MACON

Number 10 Toll Call Sent on 11/23/99
Note: Since toll call below lasted for over 2 mins. and there were no other calls around this time, could
this be a logging error at KPMG (type of call)?

10010199111910706236967700010404222313100000000000000000085344002147602000630000410000
70001000057000000001301300007062369677ROME

WATS Calls

Thirty-one completed WATS ("800", "877", "888") calls were found to have no corresponding DUF record.

Missing WATS DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response
Nov 18	12:07	888 699-2364	1	404 633-5981	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	15:16	888 255-7669	1	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	14:56	800 284-4886	2	770 933-8526	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 18	18:29	800 207-4512	1	912 741-6758	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	13:06	800 888-8000	1	912 746-7876	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 19	11:30	800 207-4512	1	404 633-3674	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 19	11:40	800 888-4848	2	706 236-9042	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 19	10:47	888 820-2265	3	706 722-4181	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 19	12:06	888 624-6633	1	706 722-4955	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 19	14:36	877 762-2667	1	770 933-8170	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 20	10:42	603 382-9705	56	404 633-5251	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 20	10:36	800 888-8000	1	706 236-9492	Could not find any record of call, and switch recording records were not available due to the age of the calls.

Long Distance Calls

One hundred eighty-five completed long distance calls were found to have no corresponding DUF record.

Missing Long Distance DUF Records (Representative List)

Date	Connect	To	Duration	From	BellSouth Response
Nov 18	09:33	912 471-9199	1	404 633-5981	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	17:00	912 741-7059	3	706 722-4181	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 18	15:45	770 933-8170	4	706 722-4955	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 18	15:57	706 722-4181	3	770 933-8523	Orig # not UNE, Term # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 19	12:06	603 382-9705	3	706 236-9312	Orig # not UNE until 12/02/99. KPMG should not have expected a record for this call.
Nov 19	09:22	603 382-9705	1	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 19	09:21	603 382-9705	7	706 722-2879	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 19	15:07	415 863-8500	1	706 722-4087	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 20	10:03	603 382-9705	1	706 722-4953	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 20	10:26	912 741-6758	1	770 933-8526	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.
Nov 20	10:02	404 633-5740	1	912 741-4774	Could not find any record of call, and switch recording records were not available due to the age of the calls.
Nov 20	09:46	404 633-5740	1	912 741-5953	Could not find any record of call, and switch recording records were not available due to the age of the calls.

Impact

Failure to deliver DUF records impacts CLECs in the following ways:

- **Decrease in revenue.** A CLEC not receiving accurate DUF records will not be able to appropriately bill the end-users or inter-exchange carriers, which will decrease revenue.
- **Inaccurate forecasting.** A CLEC will not be able to make accurate usage and revenue projections for its customer base.

Additional BellSouth Response

This exception report was provided to BellSouth after the switch recordings (from which "verbatims" are created) had aged off from our files, and were no longer available for investigation purposes. BellSouth could not verify if some of these calls were ever actually made and/or recorded in the switches.

Date: February 15, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ODUF/ADUF Functional Evaluation (BLG-2).

Exception:

BellSouth did not deliver timely DUF records to KPMG.

During the usage test call period, November 18-20, 1999, KPMG placed 846 test calls that were expected to generate Daily Usage File (DUF) records. KPMG identified 389 test calls (46%) for which no corresponding DUF records were transmitted by BellSouth. Of the 457 DUF records received, 8% were received in greater than four days[1].

All DUF records received within seventy-five days from the close of the test call period were included in this analysis. The following tables provide a breakdown of DUF record delivery data.

Timeliness of delivery for DUF records received

Category	Percent Received
DUF in 1 business day	27%
DUF in 2 business days	50%
DUF in 3 business days	8%
DUF in 4 business days	7%
DUF in > 4 business days	8%

DUF Records Received After Four Business Days

File Name	Time Interval (in days)	Record Identifier	From Number	To Number	Record Date	Header Date
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 323202.D2000021.T143232.temp2000012515000276800	5	110101	4046335740	0000000000	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	5	100131	9127416758	9127416728	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	5	100131	9127416758	9127416728	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp2000012518001594000	5	100131	9127416728	9127416758	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp2000012518001594000	5	100131	9127415953	9129292400	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc.	5	100131	9127415953	9127463050	11/19/1999	11/26/1999

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[1] Because timely receipt of DUF records is essential for CLEC billing activities, four days is used as a benchmark for reasonably efficient file transmission for the purposes of this exception.

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221850.D2000025.T152218.temp20000125 18001594000						
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	5	100131	9127415953	9127416758	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	5	100101	7062369492	4046333616	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	5	100101	7062369677	7709338170	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	5	100101	7062369492	7709338526	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	5	100131	9127416728	9124760330	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 323202.D2000021.T143232.temp20000125 15000276800	5	110101	4046333674	0000000000	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 323202.D2000021.T143232.temp20000125 15000276800	5	110101	4046333240	0000000000	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 323202.D2000021.T143232.temp20000125 15000276800	5	110101	4046333616	0000000000	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 323202.D2000021.T143232.temp20000125 15000276800	5	110101	4046333674	0000000000	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 323202.D2000021.T143232.temp20000125 15000276800	5	110101	4046333616	0000000000	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 323202.D2000021.T143232.temp20000125 15000276800	5	110101	4046333240	0000000000	11/19/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 221850.D2000025.T152218.temp20000125 18001594000	6	010101	7062369677	4042223457	11/18/1999	11/26/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 304767.D1999335.T083047.temp1999120 112000301700	10	010118	7709338170	7703199001	11/19/1999	12/1/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 304767.D1999335.T083047.temp1999120 112000301700	10	010132	7709338170	7704110000	11/19/1999	12/1/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 363452.D1999336.T073634.temp1999120 212000148500	11	010132	7067224181	7064110000	11/19/1999	12/2/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 363452.D1999336.T073634.temp1999120 212000148500	11	010132	7067224181	7064110000	11/19/1999	12/2/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 363452.D1999336.T073634.temp1999120 212000148500	11	010132	7067224087	7064110000	11/19/1999	12/2/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 363452.D1999336.T073634.temp1999120 212000148500	11	010132	7067224087	7064110000	11/19/1999	12/2/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 363452.D1999336.T073634.temp1999120 212000148500	11	010118	7067224181	7067373227	11/19/1999	12/2/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 363452.D1999336.T073634.temp1999120 212000148500	11	010118	7067224087	7066676368	11/19/1999	12/2/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 133238.D1999356.T071332.temp1999123 011270617000	31	010132	7709338523	7704110000	11/19/1999	12/22/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 133238.D1999356.T071332.temp1999123 011270617000	31	030101	7709338523	7062369042	11/19/1999	12/22/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsodufga.zxc. 133238.D1999356.T071332.temp1999123 011270617000	31	010132	7709338523	7704110000	11/19/1999	12/22/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 375210.D1999357.T073752.temp1999123 011271316300	32	110101	7067226207	7709338170	11/19/1999	12/23/1999
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 331716.D2000007.T073317.temp2000011 312001210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 331716.D2000007.T073317.temp2000011 312001210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 331716.D2000007.T073317.temp2000011 312001210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 331716.D2000007.T073317.temp2000011 312001210200	46	110101	7062369677	0000000000	11/20/1999	1/7/2000
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 331716.D2000007.T073317.temp2000011 312001210200	46	110101	7062369677	0000000000	11/20/1999	1/7/2000
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 331716.D2000007.T073317.temp2000011 312001210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000
C:\DUFLoader\DUFUtility\Data\DUFFiles/dsadufga.zxc. 331716.D2000007.T073317.temp2000011 312001210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000

Impact

Failure to deliver DUF records in a timely manner will impact CLECs in the following ways:

Decrease in current cash flow. A CLEC not receiving timely DUF records will not be able to bill end-users or inter-exchange carriers in a timely fashion. As a result, cash flow due to the CLEC from end-users or inter-exchange carriers will be delayed.

Decrease in Customer Satisfaction. Because a CLEC does not receive DUF records in a timely fashion, charges for some service may have to be delayed until a future billing cycle. End-user customers and inter-exchange carriers will likely react negatively to such a delay, and a decrease in CLEC customer satisfaction will result.

⊕ *BELLSOUTH*

February 25, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ODUF/ADUF Functional Evaluation (BLG-2).

Exception:

BellSouth did not deliver timely DUF records to KPMG.

During the usage test call period, November 18-20, 1999, KPMG placed 846 test calls that were expected to generate Daily Usage File (DUF) records. KPMG identified 389 test calls (46%) for which no corresponding DUF records were transmitted by BellSouth. Of the 457 DUF records received, 8% were received in greater than four days[1].

All DUF records received within seventy-five days from the close of the test call period were included in this analysis. The following tables provide a breakdown of DUF record delivery data.

Timeliness of delivery for DUF records received

Category	Percent Received
DUF in 1 business day	27%
DUF in 2 business days	50%
DUF in 3 business days	8%
DUF in 4 business days	7%
DUF in > 4 business days	8%

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[1] Because timely receipt of DUF records is essential for CLEC billing activities, four days is used as a benchmark for reasonably efficient file transmission for the purposes of this exception.

DUF Records Received After Four Business Days

File Name	Time Interval (in days)	Record Identifier	From Number	To Number	Record Date	Header Date	BellSouth Response
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 323202.D2000021.T143232.temp20000125150002768000	5	110101	4046335740	0000000000	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100131	9127416758	9127416728	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100131	9127416758	9127416728	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100131	9127416728	9127416758	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100131	9127415953	9129292400	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100131	9127415953	9127463050	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100131	9127415953	9127416758	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100101	7062369492	4046333616	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100101	7062369677	7709338170	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100101	7062369492	7709338526	11/19/1999	11/26/1999	Message was delivered within 6 Business days. This Message is not late.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	5	100131	9127416728	9124760330	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 323202.D2000021.T143232.temp20000125150002768000	5	110101	4046333674	0000000000	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 323202.D2000021.T143232.temp20000125150002768000	5	110101	4046333240	0000000000	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 323202.D2000021.T143232.temp20000125150002768000	5	110101	4046333616	0000000000	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 323202.D2000021.T143232.temp20000125150002768000	5	110101	4046333674	0000000000	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 323202.D2000021.T143232.temp20000125150002768000	5	110101	4046333616	0000000000	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 323202.D2000021.T143232.temp20000125150002768000	5	110101	4046333240	0000000000	11/19/1999	11/26/1999	Message was delivered within 6 Business days.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsodufga.zxc. 221850.D2000025.T152218.temp20000125180015940000	6	010101	7062369677	4042223457	11/18/1999	11/26/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-23-99

File Name	Time Interval (In days)	Record Identifier	From Number	To Number	Record Date	Header Date	BellSouth Response
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 304767.D1999335.T083047.temp19991201120003011700	10	010118	7709338170	7703199001	11/19/1999	12/1/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-29-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 304767.D1999335.T083047.temp19991201120003011700	10	010132	7709338170	7704110000	11/19/1999	12/1/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-29-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 363452.D1999336.T073634.temp19991202120001485 00	11	010132	7067224181	7064110000	11/19/1999	12/2/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-30-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 363452.D1999336.T073634.temp19991202120001485 00	11	010132	7067224181	7064110000	11/19/1999	12/2/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-30-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 363452.D1999336.T073634.temp19991202120001485 00	11	010132	7067224087	7064110000	11/19/1999	12/2/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-30-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 363452.D1999336.T073634.temp19991202120001485 00	11	010132	7067224087	7064110000	11/19/1999	12/2/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-30-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 363452.D1999336.T073634.temp19991202120001485 00	11	010118	7067224181	7067373227	11/19/1999	12/2/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-30-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 363452.D1999336.T073634.temp19991202120001485 00	11	010118	7067224087	7066676368	11/19/1999	12/2/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 11-30-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 133238.D1999356.T071332.temp19991230112706170 00	31	010132	7709338523	7704110000	11/19/1999	12/22/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 12-20-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 133238.D1999356.T071332.temp19991230112706170 00	31	030101	7709338523	7062369042	11/19/1999	12/22/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 12-20-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 133238.D1999356.T071332.temp19991230112706170 00	31	010132	7709338523	7704110000	11/19/1999	12/22/1999	Guide not found due to Service Order not posting, message received 6L error, system released usage when the guide posted. Released from error processing on 12-20-99
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 375210.D1999357.T073752.temp19991230112713163 00	32	110101	7067226207	7709338170	11/19/1999	12/23/1999	Could not find this message to perform in depth analysis due to the age of the record.
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 331716.D2000007.T073317.temp20000113120012102 00	46	110101	7062369787	0000000000	11/20/1999	1/7/2000	Record received WF error due the terminating NPA-NXX not on the Terminating Point Masterfile. Message released from error processing on 01-05-00.
C:\DUFLoader\DUFUtilityData\DUFFiles\dsodufga.zxc. 331716.D2000007.T073317.temp20000113120012102 00	46	110101	7062369787	0000000000	11/20/1999	1/7/2000	Record received WF error due the terminating NPA-NXX not on the Terminating Point Masterfile. Message released from error processing on 01-05-00.

File Name	Time Interval (in days)	Record Identifier	From Number	To Number	Record Date	Header Date	BellSouth Response
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 331716.D2000007.T073317.temp20000113120011210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000	Record received WF error due the terminating NPA-NXX not on the Terminating Point Masterfile. Message released from error processing on 01-05-00.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 331716.D2000007.T073317.temp20000113120011210200	46	110101	7062369677	0000000000	11/20/1999	1/7/2000	Record received WF error due the terminating NPA-NXX not on the Terminating Point Masterfile. Message released from error processing on 01-05-00.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 331716.D2000007.T073317.temp20000113120011210200	46	110101	7062369677	0000000000	11/20/1999	1/7/2000	Record received WF error due the terminating NPA-NXX not on the Terminating Point Masterfile. Message released from error processing on 01-05-00.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 331716.D2000007.T073317.temp20000113120011210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000	Record received WF error due the terminating NPA-NXX not on the Terminating Point Masterfile. Message released from error processing on 01-05-00.
C:\DUFLoader\DUFUtility\Data\DUFFiles\dsadufga.zxc. 331716.D2000007.T073317.temp20000113120011210200	46	110101	7062369787	0000000000	11/20/1999	1/7/2000	Record received WF error due the terminating NPA-NXX not on the Terminating Point Masterfile. Message released from error processing on 01-05-00.

Impact

Failure to deliver DUF records in a timely manner will impact CLECs in the following ways:

Decrease in current cash flow. A CLEC not receiving timely DUF records will not be able to bill end-users or inter-exchange carriers in a timely fashion. As a result, cash flow due to the CLEC from end-users or inter-exchange carriers will be delayed.

Decrease in Customer Satisfaction. Because a CLEC does not receive DUF records in a timely fashion, charges for some service may have to be delayed until a future billing cycle. End-user customers and inter-exchange carriers will likely react negatively to such a delay, and a decrease in CLEC customer satisfaction will result.

Additional BellSouth Response

BellSouth has a requirement to be at parity with our Retail operations for usage data timeliness. BellSouth will deliver 95% of the messages over the Optional Daily Usage File (ODUF) and the Access Daily Usage File (ADUF) within 6 workdays from the recording date of messages. This is the same measure we use for our process called the Centralized Message Distribution System (CMDS) that is used to deliver messages to other BellSouth Revenue Accounting Offices, and to other carriers. The 95% message delivery measure is an industry standard that is documented in the CMDS Settlements User Group (CSUG) documentation. Service

Order completion problems caused most late messages to be delivered past the 6-day objective. Some messages were delivered late due to some standard billing system error conditions that had to be manually corrected before being passed to KPMG.

Based on BellSouth's definition of Usage Timeliness, we delivered 95.8% of ODUF/ADUF records within the prescribed interval.

<u>CERTIFICATE OF SERVICE</u>
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 9th day of March 2000.

David Frey

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March 23, 2000

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GEORGIA

BY HAND DELIVERY

Helen O'Leary
Executive Secretary
Georgia Public Service Commission
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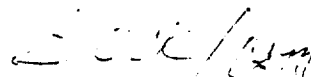
Re: **Investigation Into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U**

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

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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

Comes Now AT&T Communications of the Southern States, Inc. (AT&T), and files its Comments on KPMG's seventh Interim Status Report dated March 3, 2000, and on activities associated with Exception Reports and Responses, Amendments to Reports and Responses, and Closure Reports posted to the Georgia Public Service Commission's website.

1.

To ensure that CLECs who rely upon BellSouth's OSS to serve their customers would receive the same quality of service that BellSouth experiences in providing service to its retail customers, this Commission entered an Order establishing Third Party Testing (TPT) of BellSouth's Operational Support Systems (OSS). To date, AT&T has provided comments as well as suggested modifications to the Master Test Plan (MTP), Supplemental Test Plan (STP) and reports generated from the TPT. This Commission should use the comments filed by AT&T and other CLECs as guide to determine whether or not the TPT, when completed, will correct problems with BellSouth's OSS that prevent CLECs from serving Georgia consumers. Otherwise, Georgia consumers and CLECs could be at risk of experiencing the same types of problems which New York consumers and CLECs are experiencing today. Bell Atlantic's systems are currently unable to handle the number of orders that CLECs are submitting at true commercial volumes. The result in New York is that tens of thousands of customer orders have been lost or pending for weeks and even months. The consumer ends up being the loser.

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AT&T is simply asking this Commission to open the processes of the TPT, not to hinder or hamper its completion, but to allow those whose customers will be directly impacted by the test to participate in the test. KPMG can attempt to replicate the daily operations of a CLEC as a "pseudo-CLEC", but KPMG's experience and results will be vastly different from live transactions involving real customers. Only when armed with information about actual problems CLECs continue to experience with BellSouth's OSS can KPMG design and execute test scenarios that will pinpoint and eliminate these problems.

The TPT should result in Georgia consumers having a real choice in telecommunications providers who provide quality service. AT&T, in the comments provided herein as well as all previously filed comments, merely seeks to aid the Commission in accomplishing that goal.

2.

On March 3, 2000, KPMG filed with the Commission the seventh in the series of Interim Status Reports associated with the Georgia Third Party Test. At various times from February 15, 2000, through March 13, 2000, the Georgia Public Service Commission has caused to be posted to its website Exception Reports produced by KPMG; Responses produced by BellSouth; Amended Reports and Responses; and Closure Reports produced by KPMG. Below and in the accompanying attachments, AT&T provides its comments on the Interim Report; Exception Closure Reports for Exceptions 3, 5 and 8; Amended Exception Report and Response for Exception 9; Amended Responses for Exceptions 12 and 14; and Exception Reports 10 through 29.

AT&T's Comments are provided on the following key areas:
- The Third Party Test Process – Section I
- Change Management – Section II
- Capacity Management / Commercial Volume Capability – Section III

- Pre-Order Response Timeliness IV

- Billing / Usage Data – Section V

- BellSouth's Inappropriate Attempts to Subvert the Test – Section VI

- Requests for Additional Information / Action – Section VII

Three Attachments are included to provide additional detail and support to the Comments:

- AT&T's Detailed Comments on Georgia Third Party Test Exception and Closure Reports – Attachment A;

- AT&T's Detailed Comments on the March 3, 2000, KPMG Interim Status Report – Attachment B; and

- Electronic Mail Messages Associated with the Interim Change Control Process – Attachment C.

I.
The Third Party Test Process

The limited information provided to AT&T and other CLECs as part of the test highlights the need for additional CLEC participation in the test process. CLECs continue to be excluded from receiving timely access to vital information developed during the test concerning day-to-day operations. For example, at Ref V-3 of the March 2 Interim Status Report, KPMG discusses a *BLS Documentation Issues Report* and weekly conference call during which the report is reviewed and updated. These issues directly impact CLECs and their customers on a daily basis. The report and BellSouth's responses should be made available to the CLECs when they are produced. Additionally CLECs should be granted "observer" status on the weekly conference calls. This will allow CLECs to benefit from BellSouth's clarifications and revisions of its

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documentation, business rules, procedures and requirements when they occur, rather than weeks or months later when BellSouth updates the documentation provided to CLECs.

Similarly, during a recent weekly CLEC/KPMG status call, KPMG indicated that it was experiencing problems with order flow through in its preparations to perform volume testing, and that BellSouth's central office work associated with "hot cuts" was not being performed in conformance with BellSouth's own documentation. When asked for more specific information and access to documentation about each of these problems, KPMG was unable to provide details and reported that the "hot cut" documentation could not be shared with CLECs as BellSouth claimed it to be proprietary. Lack of flow-through and failed hot cuts impact CLEC's customers on a daily basis, yet CLECs are not provided the information needed for meaningful input into the testing process.

Similarly, CLECs are not provided insight into the process by which KPMG is preparing final test reports. Indeed, at various points throughout the March 2 Interim Status Report, KPMG notes that it has completed a test and is preparing a final test report dealing with its findings. However, the final test report is being prepared at the same time that there are open Exceptions associated with the test in question. (Ref I-8, IV-1, IV-2, IV-3). AT&T does not understand how final reports can be generated when open exceptions exist. Moreover, unlike the process utilized in the New York Third Party Test, CLECs are not given access to draft reports or the opportunity to provide comments.

Finally, in each of the Exception Closure Reports posted to the Commission website between February 15, 2000 and March 13, 2000 (Exceptions #3, 5 and 8), KPMG has focused narrowly upon the singular issue identified in the title of the Exception. In so doing, KPMG has ignored other information contained within or associated with the Exception potentially worthy of consideration as an Exception in its own right, or which should have precluded closure of the original Exception. The details associated with the three closures that have been posted can be found in Attachment A.

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Therefore, AT&T reiterates its request that CLECs be provided additional participation in the Third Party Testing process, including, but not limited to the ability to view and comment on draft final reports as was the practice in New York and access to information underlying key issues which surfaced during the test.

II.
Change Management

Change Management is discussed at Ref II-5 of the Interim Report, and in Exceptions 2, 17 and 19. AT&T continues to have concerns both with the proposed Interim Change Control Process (CCP) under discussion (Ref II-5 and Exp #2) and with its implementation. A two-day workshop and an additional half-day teleconference have been held to address fundamental changes to a process critical to CLECs ability to provide reliable customer service over time as changes to operational software, systems and procedures are introduced. Agreement upon and documentation of the proposed interim process is incomplete. The next teleconference is now scheduled for March 23, 2000.

Using the proposed interim process, AT&T has submitted several new defect requests, only to have BellSouth unilaterally reclassify them to a less urgent status in violation of its own proposed process. The email messages included in Attachment C document one instance in which BellSouth initially began to process AT&T's request as a defect and then reclassified the request as a "feature." BellSouth's unilateral change means that AT&T and other CLECs are attempting to process orders with valid information received from BellSouth's internal systems, but the orders are being rejected by BellSouth ordering systems. CLECs are being forced to place such orders manually until BellSouth elects to implement correcting software code. In this case, instead of

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implementing a fix within five days (on March 7) as called for by the Interim Change Control Process, BellSouth will not implement a fix until April 15, 2000.

In responding to Exception 17, which addresses deficiencies in BellSouth's change management due to an inadequate posting of documentation to the OSS Information Center website, BellSouth simply acknowledged the individual problems and told why they occurred, rather than describing how BellSouth will correct the problem. The response, however, is in direct contrast to the information provided in the Interim Status Report which indicates that BellSouth is now apparently preparing a plan to address this problem (Ref IV-5). AT&T requests more information regarding the BellSouth plan, and its relationship to the existing Electronic Interface Change Control Process and the new Interim Change Control Process.

AT&T agrees with KPMG's assessment in Exception 19 that changes to BellSouth's Service Quality Measurement (SQM) Plan have not been adequately documented. AT&T may comment further once BellSouth issues its change summary page. AT&T notes that this failure to document changes is merely the tip of the iceberg in regards to problems with BellSouth's change management process for its SQM. BellSouth has made substantive unilateral changes to its SQM and characterized them on its website to be a result of the collaborative process in Louisiana. This is inaccurate as many of the changes to the SQM are strongly opposed by the CLECs participating in Louisiana.

Further the most recent changed SQM (posted to the BellSouth website on March 2, 2000) includes a new Appendix D "Analogs and Benchmarks" that has never been subject to review or approval by this Commission, or any other regulatory body. BellSouth's addition of Appendix D is a thinly vailed attempt to impose its own wish list of standards as the standards to be applied by KPMG in the Georgia Third Party Test. The Commission should reject BellSouth's attempt to subvert the Commission's

authority and should, as suggested in current guidance provided by the FCC, initiate a Collaborative Workshop with CLEC participation to establish the standards to be used.

III.
Capacity Management – Commercial Volume Capability

In discussing the status of Volume Testing (Ref II-4), KPMG highlights a number of unresolved issues with the RSIMMS test environment. AT&T has repeatedly expressed its concerns regarding performing these volume tests in an off-line, non-production, simulated environment. These concerns are further heightened by the recent failure of Bell Atlantic New York's ordering systems when subjected to commercial market volumes. Therefore AT&T requests that BellSouth's actual ordering systems be subjected to volume and stress testing. To alleviate concerns regarding potential customer impact, such tests could be performed in off-hours.

KPMG also addresses Capacity Management concerns in Exception 25. BellSouth's response clearly indicates that KPMG's findings are correct and that meaningful and re-testable resolutions will not be implemented until "March 31, 2000", "by the end of the second quarter", and "by June 30, 2000." The absence of these procedures is a grave concern and also is further heightened by the recent failure of Bell Atlantic New York's ordering systems when subjected to commercial market volumes. AT&T sent a letter to KPMG on February 28, 2000, asking how testing for commercial volumes would be accomplished to prevent what has occurred in New York. To date, KPMG has not responded.

IV.
Pre-Order Response Timeliness

KPMG reports in Exception 24 that BellSouth's TAG interface does not deliver timely responses to pre-order transactions. AT&T strongly opposes KPMG's use of 15 seconds as a benchmark for an acceptable pre-order response. KPMG must use the standard of parity required by the Commission in its May 6, 1998 Order in Docket No. 7892-U (page 17).

AT&T also requests that KPMG compare these responses with the response interval distributions reported by BellSouth in its monthly SQM reports. Even utilizing KPMG's unrealistic 15 second benchmark, neither the aggregate 29% of TAG API responses greater than 15 seconds or any of the individual query type responses (ranging from 7-74% greater than 15 seconds) would represent acceptable performance. BellSouth has previously testified that the latency (turnaround time) in the TAG gateway had been tested and was measured in fractions of a second rather than seconds (See testimony of William N. Stacy, October 19, 1999, in Alabama Public Service Commission Docket 25835, Tr. pages 863-864). The Commission should direct KPMG to re-test the full range of pre-order transactions following BellSouth implementation of its software change using parity as the standard.

V.
Billing / Usage

The Optional Daily Usage File (ODUF) / Access Daily Usage File (ADUF) issues KPMG discusses in the Interim Status Report at Ref IV-3 have been posted as Exceptions 27, 28 and 29. Exception 16 addresses BellSouth's preparation of multiple CRIS/CABS bills containing erroneous information. Additionally a number of other Exceptions (especially Exception 26) include situations which impact billing and usage recording.

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AT&T's experience with BellSouth's CRIS/CABS billing is similar to that of KPMG as noted in Exception 16. KPMG is anticipating an amended response (Interim Report Ref IV-5). With one exception, AT&T will reserve comments on this report until the amended response is posted. BellSouth responded that the lack of detail being provided to KPMG was at parity with retail customers who also receive aggregate credit information. Parity with retail customers does not meet BellSouth's obligations to CLECs under the Act. CLECs are not retail customers. BellSouth must provide CLECs with detailed billing information equal to that it provides itself.

In Exception 26, KPMG discusses BellSouth's failure to deliver timely Completion Notices (CN). Over the past 18 months, AT&T has forwarded numerous instances of BellSouth's failure to provide CNs to its account team. One particularly troubling aspect of BellSouth's failure to provide CNs is that often BellSouth has also failed to turn off its billing of AT&T's new customer. This results in customers being double/erroneously billed by BellSouth for local service that is being provided by AT&T and in failure by BellSouth to produce and send associated usage files to AT&T. AT&T requests that KPMG include in its on-going analysis of delayed and missing CNs the associated impact on other processes such as Daily Usage File (DUF) preparation and customer billing. BellSouth's failure to fully complete the provisioning process through to the proper establishment of billing accounts affects CLECs and their customers.

AT&T also is concerned with BellSouth's admission in Exception 26 that it is not retaining logs and audit trails associated with test transactions. This failure to retain all information related to test transactions violates the test plan and casts doubt on the credibility of the test process and results. Without a complete record of test transactions, KPMG cannot properly investigate and document its findings. Furthermore, the final test report will not allow the Commission and parties to validate these findings. The

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Commission should direct that KPMG consider all situations in which BellSouth has failed to retain proper records as an exception and initiate re-testing.

The subject of Exception 28 is BellSouth's failure to deliver 46% of the expected DUF records associated with KPMG's test transactions. AT&T finds BellSouth's responses to this Exception troubling. The most common response is "Could not find any record of call, and switch recording records were not available due to the age of the calls." Here again, as noted in Exception 26 above, BellSouth has failed to keep records of transactions containing known test transactions. The only reasonable course of action is for the Commission to direct KPMG to re-initiate the entirety of the ODUF/ADUF Functional Evaluation BLG-2 and direct BellSouth to retain all associated switch recording records. Failure by BellSouth to retain the required information for validation of KPMG's findings compromises the test results.

In Exception 29, KPMG is using an arbitrary four day standard for the benchmark to determine that BellSouth did not deliver DUF records in a timely manner. In its response BellSouth states that its performance is timely when measured against a six day standard. Neither standard is appropriate. As BellSouth notes in its response it "has a requirement to be at parity with our retail operations for usage timeliness." In order to demonstrate that it is meeting its requirement BellSouth needs to provide its actual retail usage delivery performance information. The Commission should direct BellSouth to provide its actual retail delivery interval distribution information for transport of usage to its Regional Accounting Offices (RAO's) for KPMG to use as the criterion for parity comparisons.

VI.
BellSouth is Changing its Documentation to Clear Test Exceptions Rather than Implement System Changes Required to Comply with the Act

In Ref I-6 of the Interim Report KPMG discusses what is now BellSouth's third position regarding the capabilities of the CLEC ordering interfaces to support the

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migration of existing ISDN and Centrex Services to UNEs. BellSouth's existing documentation and initial discussions with KPMG stated that such conversions were fully supported and electronically orderable. Months later as reflected in KPMG's sixth Interim Status Report (1/28/00), BellSouth's position is that the interfaces do not support such migrations and the documentation is being revised. Therefore, according to BellSouth, such transactions should be beyond the scope of the test. BellSouth has now provided KPMG with the information that migrations to UNE loops for ISDN and Centrex Services using electronic ordering is possible. Such a capability, conversion to UNE loops, is meaningless because these services require not only a loop, but a port also. This appears to be an attempt by BellSouth to inappropriately restrict the purchase of these services as UNE loop + port combinations.

In the Exception 5 Closure Report KPMG states that BellSouth has resolved the problem preventing CLECs from submitting supplemental orders to correct input errors in the "CC" and "LOCBAN" fields by updating its documentation to reflect the fact that the two fields, "CC" and "LOCBAN," can not be changed by issuing a supplemental order. This closure ignores the additional workload placed upon CLECs when input errors cannot be corrected using supplemental orders. An entirely new order must be submitted which includes higher operating costs, increased probability of additional error and delay. Furthermore, BellSouth's restrictions on the fields that can be corrected by using supplemental orders do not comply with the Ordering and Billing Forum's (OBF's) Local Service Request (LSR) Guidelines.

In its Amended Response to Exception 9, BellSouth reports that it is providing training to its personnel on how to properly handle the situation when a valid error-free CLEC order falls out for manual processing and fails to generate mechanized Firm Order Confirmations (FOC) and/or Completion Notices (CN). BellSouth's response is a work around, not a resolution of the problem, causing valid error free orders to be mishandled by BellSouth's systems. When a CLEC submits an error-free order, BellSouth's systems

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are responsible for ensuring that the proper information is provided to the Service Order Control System (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 such as retraining personnel to deal with a system defect. 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.

In each of its responses to Exceptions 10, 11, and 14, BellSouth proposes to revise its documentation. AT&T is concerned that BellSouth is potentially rewriting TAFI documentation to eliminate references to functionalities that expose errors that are inherent in the system rather than fixing the problems. KPMG should determine whether Retail TAFI and its documentation have these same problems. Additionally, KPMG should examine what other telephone number based services described in the original TAFI documentation provided to KPMG cannot be handled by the Trouble Analysis Facilitation Interface (TAFI).

VII.
Requests for Additional Action/Information

KPMG lists a number of issues related to Electronic Data Interface (EDI) and Telecommunications Access Gateway (TAG) functional testing in the Interim Report (Ref I-6 and I-7). Most of these issues appear to meet the criteria for the issuance of an exception report. AT&T requests that exceptions be issued so that BellSouth will be required to implement the necessary fixes. (I-6) (I-7)

AT&T further requests that KPMG provide more specific information about the LSR fallout investigation and potential BellSouth system limitation associated with CLEC-to-CLEC migrations referred to in Ref III-1 and III-2 so that it may understand and comment on these issues.

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AT&T also seeks clarification from KPMG that its comments at Ref III-1 related to CLEC flow-through interviews will not prevent a possible future exception report on issues identified through CLEC interviews. In the Next Step/Resolution column at Ref V-3 and VII-1, KPMG makes multiple (9) references to *LEO Guide, Version 7O* as solution for the issues noted. AT&T understands that this new documentation is scheduled for publication on April 7, 2000. AT&T seeks guidance from KPMG on its plans to conduct a re-test following the publication and implementation of the *LEO Guide*.

In discussing the Supplemental Test Plan under Ref VII-4, KPMG states that "Based on any subsequent direction from the Georgia Commission, KPMG will modify Metrics testing as necessary." AT&T seeks clarification regarding any Georgia Commission direction contemplated by KPMG. Specifically, AT&T needs clarification as to whether or not the STP will be further modified to reflect this subsequent direction and whether there will be an opportunity for CLECs to comment on the metrics and STP.

In its response to Exception 13, BellSouth states that there maybe a legal requirement to provide a CPNI warning to CLECs when customer records are accessed. If there is a legal requirement for a CPNI warning to CLECs, a single unambiguous message should be implemented at the same time the other BellSouth specific messages are removed on 3/31/00. BellSouth's systems should not send erroneous messages to CLECs, which could cause input errors. The two messages currently provided direct BellSouth's personnel not to conduct sales activities on the specific account accessed and have no value to CLECs.

In Exception 18, KPMG notes that the use of two specific ordering codes listed as valid in BellSouth's documentation will result in the assignment of input errors to CLECs that follow the documentation. AT&T requests that KPMG further investigate the impact on flow-through reporting resulting from the assignment of errors to CLECs for using the "valid" UEPRX and UEPBX codes.

In its response to Exception 21, BellSouth acknowledges KPMG's findings related to Flow-through reporting and discusses associated code changes to be implemented in February and March to be applied to January and February results. AT&T notes that BellSouth has posted a notice on the Performance Measures Web site withdrawing the January Flow-Through Report due to an unexplained error. AT&T requests that, when BellSouth has corrected its error and successfully implemented the required code changes, KPMG investigate during re-test all of the issues cited in the exceptions that have a potential impact on the validity of the *Percent Flow Through Service Request Report.* These include Exceptions 9, 18, 22, and 26.

WHEREFORE, AT&T requests this Commission to issue an Order which mandates the following:

(a) Require that BellSouth and KPMG provide CLECs with timely access to the documentation and information being received and produced as part of the test;

(b) Require KPMG to distribute draft final reports for comment by CLECs;

(c) Require BellSouth to provide additional information regarding BellSouth's plan for addressing KPMG's Exceptions;

(d) Direct re-testing of pre-order transactions following BellSouth's implementation of its software change using parity as the standard;

(e) Direct KPMG to review BellSouth's failure to retain proper test records;

(f) Direct BellSouth to provide actual retail delivery distribution for transport usage for KPMG to use as the criterion for parity comparison;

(g) Require BellSouth to respond to Exceptions by making appropriate systems changes, not writing the functionality out of the documentation; (h) Require KPMG to take the actions and provide the information listed in Section VII; and

(i) For such other and further relief that this Commission deems just and proper in accordance with the Comments provided herein.

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A

AT&T Comments on Georgia Third Party Test Exception and Closure Reports   Attachment A
March 22, 2000

Exception	Report Title	AT&T Comments
3	Competitive Local Exchange Carriers (CLECs) are not notified when BellSouth initiates changes to published historical performance measurement reports and/or the raw data files associated with these reports after this information has been removed from the Performance Measurement and Analysis Platform (PMAP) web site. Exception Closure Report dated February 10, 2000.	**Comments:** The exception and closure report ignore 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 sites for the previous month, or for historical reports and data. Closure should not have been based upon notifying CLECs that previously posted reports had changes. Instead, BellSouth should have been required to demonstrate that the underlying performance measurement reports could be produced accurately and the processes upon which the reports are based are stable and accurate. Otherwise, the reports will continue to be inaccurate. (See AT&T's comments of 2/15/00). BellSouth has noted six problems with reports for the month of January alone, and has posted none of the changes made to previous months on its web site. Additionally, it appears that BellSouth is not following its new notification process because it filed changes to its December performance reports with the Georgia PSC on March 6, 2000, but has posted no notice of this change on its web-site.
5	BellSouth's rules for submitting supplements to existing service orders are not accurately defined. Exception Closure Report dated February 10, 2000.	**Comments:** In the Closure Report KPMG states that BellSouth has resolved the problem by updating its documentation to reflect the fact that the two fields "CC" and "LOCBAN" can not be changed by issuing a supplemental order. Instead of changing the documentation to incorporate the problem, BellSouth should be required to fix the problem. This closure ignores the additional workload placed upon CLECs when input errors can not be fixed using supplemental orders. BellSouth's restrictions on the fields that can be corrected by using supplemental orders does not comply with OBF LSR Guidelines.

Exception	Report Title	AT&T Comments
8	BellSouth issues firm Order Confirmations (FOCs) on CLEC service orders before facility status has been determined. Exception Closure Report dated February 10, 2000.	**Comments:** In the Closure Report KPMG continues to focus narrowly upon the fact that facilities checks are not made prior to providing either retail customers or CLECs with firm due dates. The real issue is whether parity exists between retail customers and CLEC customers when facilities problems arise after the due date has been provided. How often each group of customers is affected by this policy and how each group of customers is treated when it is discovered that a facilities problem exists must also be equivalent for parity to exist. The specific situation cited in KPMG's exception was receipt of a facilities problem notice, that did not contain a new estimated due date, three days after the receipt of the firm order confirmation. KPMG's re-test has not addressed these issues.
9	BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests. Amended Exception Report dated February 10, 2000. Amended Response dated February 10, 2000.	**Comments:** KPMG's Amended Exception Report deletes a PON that BellSouth indicated in its initial Response had not been received. 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

AT&T Comments on Georgia Third Party Test Exception and Closure Reports   Attachment A

March 22, 2000

Exception	Report Title	AT&T Comments
		implement system fixes to eliminate these failures, not just provide an interim work around such as retraining personnel to deal with a system defect. 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.

As will be discussed below in Exception 26, BellSouth's failure to provide a CN to CLECs is often accompanied with double/erroneous billing of the CLEC's new customer by BellSouth.

Since Exception 21 discussed below refers to a coding change in the flow-through reporting process that ties FOC generation to the count of a successful flow-thorough transaction, AT&T requests that KPMG consider the information associated with this exception in its investigation of flow-through. |
10	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.*	**Comments:** This appears on its face to be a documentation error. However, it would seem that the design of TAFI should allow some process by which a dispatched report can be closed by other than a field technician. For example, if the customer has called back in and says the line is OK.
11	The host request error and reset communications functions do not operate as described by the *CLEC TAFI End-User Training and User Guide.*	**Comments:** AT&T is concerned that BellSouth is potentially rewriting TAFI documentation to remove promised functionality when errors are found rather than fixing the functionality. KPMG should determine whether Retail TAFI and its documentation have these same problems.
12	The ECTA Gateway does not accurately notify	**Comments:** The software gateway should have a program in

Exception	Report Title	AT&T Comments
	CLECs when invalid information is entered into a trouble ticket. BellSouth Amended Response dated February 9, 2000.	place that lets a CLEC know when invalid information is entered. KPMG's re-testing should not occur until BellSouth's promised new release is implemented in either April or June as indicated in BellSouth's response. Further it is important to note that since KPMG is testing using a BellSouth test machine having "non-Manager" status, this testing does not reflect the real world operation of an ECTA interface that a CLEC would build in the marketplace using documentation and coordination provided by BellSouth.
13	Numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.	**Comments:** BellSouth's response related to CPNI is not consistent with the content of the two messages KPMG reports it is receiving "CPNI data unavailable do not use this customer as a sales opportunity," and "System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes," each of which directs BellSouth's personnel not to conduct sales activities on the specific account accessed. If there is a legal requirement for a CPNI warning to CLECs, a single unambiguous message should be implemented at the same time the other BellSouth specific messages are removed on 3/31/00.
14	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.* BellSouth Amended Response dated February 29, 2000	**Comments:** AT&T is concerned that BellSouth is potentially rewriting TAFI documentation to eliminate references to functionalities that expose errors that are inherent in the system rather than fixing the problems. KPMG should determine whether Retail TAFI and its documentation have these same problems as well as what other Telephone Number (TN) based services can not be handled by TAFI. It is troubling that BellSouth appears not to know the capabilities of its own systems. BellSouth has been including

Exception	Report Title	AT&T Comments
		this functionality in its description of TAFI capability for over three years and yet required over 60 days from KPMG's initial questioning to firmly state that the functionality did not exist.
15	Under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.	**Comments:** AT&T awaits the results of KPMG's re-test and its investigation of the potential issues with the new purge interval referred to in BellSouth's response.
16	CRIS/CABS Functional Test (BLG-1) - BellSouth issued multiple bills containing erroneous information to the KPMG CLEC.	**Comments:** AT&T's experience with BellSouth's CRIS/CABS billing is similar to that of KPMG for this exception. KPMG is expecting an amended response (Interim Report 3/3/2000). With one exception, AT&T will reserve comments on this Exception until the amended response is posted. BellSouth's responded that the aggregation of credit information that KPMG pointed out as an exception was parity with retail customers and therefore no change is required. Parity with retail customers in billing CLECs does not meet BellSouth's obligations under the Act. CLECs are not retail customers; BellSouth must provide CLECs with detail billing information equal to that it provides itself.
17	BellSouth's change management process for updating the Interconnection Services Local Exchange Carriers - OSS Information Center Web site allows for defects in postings.	**Comments:** BellSouth's response is inadequate. It simply acknowledged the individual problems, and told why they occurred rather than how BellSouth will correct the problem. BST's response also does not match information now available in KPMG's 3/3/2000 Interim Status Report. According to KPMG's report, BellSouth is now apparently preparing a plan to address this problem. AT&T requests more information regarding this plan, and its relationship to EICCP and the new Interim Change Control Process (CCP).

Exception	Report Title	AT&T Comments
18	BellSouth (BLS) requirements for values entered in the Line Class of Service data element for EDI and the TAG orders are not consistent, and the documentation is incomplete.	**Comments:** KPMG's experience here reflects the trial and error method of determining what will work when BellSouth has failed to provide proper documentation that CLECs have been forced to adopt over the past years. Such trial and error is inefficient and also unreliable as BellSouth is inconsistent in the application of business rules in the LCSC which is the manual processing center that handles UNE port and UNE-P orders. Additionally KPMG's experience points out that not all errors charged to CLECs in the flow-through reporting process, even those supposedly automatically clarified back to the CLEC are the result of CLEC input errors. Further the fact that the using the same two invalid USOCs (UEPRX and UEPBX) resulted in both Firm Order Confirmations (FOCs) and clarifications (CLRs) demonstrates that these orders were all handled manually in the LCSC and neither flowed through BellSouth's systems nor were they auto-clarified back to the CLEC. That manual handling was involved in all of these Category 1 and Category 2 orders is also proven by the receipt of multiple error codes when the single invalid input UEPRX was used. BellSouth's current response indicates that of the four "valid" entries for this field currently documented only two are in fact valid and that there are three other valid entries not documented. KPMG's 3/3/2000 Interim Report indicates that BellSouth is expected to provide an amended response to this exception following which re-testing will occur.

Exception	Report Title	AT&T Comments
		AT&T requests that KPMG further investigate the impact on flow-through reporting resulting from the assignment of errors to CLECs for using the "valid" UEPRX and UEPBX codes.
19	BellSouth does not adequately document changes in versions of the *BellSouth Service Quality Measurements Performance Reports*.	**Comments:** AT&T agrees with KPMG's assessment that changes to BellSouth's SQM have not been adequately documented. AT&T may comment further once BellSouth issues its change summary page. AT&T notes that this is merely the tip of the iceberg in regards to problems with BellSouth's change management process for its SQM. Further, BellSouth has made unilateral substantive changes to its SQM and characterized them on its web-site to be a result of the collaborative process in Louisiana. This is inaccurate as many of the changes to the SQM are strongly opposed by the CLECs participating in Louisiana.
20	Maintenance and Repair ECTA Functional Test (M&R-2) - BellSouth technicians cannot initiate a Verify Repair Completion request.	**Comments:** It is unclear from KPMG's 3/3/2000 Interim Report response whether this item has been or will be re-tested.
21	Local Service Requests (LSRs) were improperly categorized for *Percent Flow Through Service Request Reports*.	**Comments:** BST has acknowledged both the SOCS fall-out and "Z" processing status problems that cause BellSouth system errors to be attributed to CLECs. A code change associated with the "Z" problem was implemented on 2/11, to be applied to January data. Code changes associated with the SOCS problem are expected in March to be applied to February data following which KPMG will retest. AT&T notes that BellSouth has posted a notice on the Performance Measures Web site withdrawing the January Flow-Through Report due to an unexplained error.

Exception	Report Title	AT&T Comments
		AT&T requests that KPMG consider all of the issues cited in its exceptions that have potential impact on the validity of the *Percent Flow Through Service Request Report* – these include Exceptions 9, 18, 22, and 26.
22	TAG and EDI Order Functional Tests (O&P-1 and O&P-2) - BellSouth disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.	**Comments:** AT&T's experience is similar to that of KPMG for this exception. AT&T agrees with KPMG that this issue creates significant customer disruption and dissatisfaction, and encourages KPMG to insist that this problem **finally** be corrected. KPMG's 3/3/2000 Interim Report reflects that during re-test it experienced a related error that is now under investigation. In addition to the significant customer impact, BellSouth's processing logic also causes the Flow-through reporting to be artificially high. There are at least two dimensions to this impact: • the disconnect order that did get implemented was likely counted as either a successful flow-through LSR or as an order that fell out for manual processing ("M" order) • the "Account is Final" Error encountered on the supplemental or new order as a result of BellSouth's failure to stop its processing is always counted as a CLEC error. (This error type is always in the top dozen errors reported monthly.)
23	KPMG cannot replicate five of BellSouth's reported Service Quality Measurements.	**Comments:** *Average Answer Time-Repair* - In its response, BellSouth stated that is was currently calculating this measurement for business using only 2 of its 4 categories for business customers, but will change to include all 4 categories in the future, thus rendering all historical data for this measurement meaningless. Other comments made in BellSouth's response indicate that it

Exception	Report Title	AT&T Comments
		provided incorrect information to KPMG for both repair and ordering center responsiveness measures.
		Mean Held Order Interval - Now that BellSouth has provided KPMG with a corrected User Guide, AT&T requests that KPMG verify the calculations not only for the KPMG CLEC, but CLEC aggregate and BellSouth retail as well.
		Percent Provisioning Troubles within 30 days — BellSouth's response indicated multiple problems with this measure (which it states have now been corrected). AT&T requests that historical reports for this measure be re-calculated.
		Firm Order Confirmation - In its response, BellSouth appears to indicate that KPMG's issue with the FOC report was that it did not disaggregate for UNE Combos. However, this problem is not confined to the FOC measure. BellSouth has not, to date, disaggregated for UNE Combos for any measure. Further, KPMG's exception report does not indicate that its inability to replicate this data was limited to UNE Combos.
24	BellSouth's TAG interface does not deliver timely responses to pre-order transactions.	**Comments:** AT&T strongly opposes KPMG's use of 15 seconds as a benchmark for an acceptable pre-order response. KPMG should use the standard of parity required by the Georgia PSC in its May 6, 1998 Order in Docket No. 7892-U (see Page 17).
		AT&T also requests that KPMG compare these responses with the response interval distributions reported by BellSouth in its monthly SQM reports.
		Even utilizing the unrealistic 15 second benchmark, neither the

Exception	Report Title	AT&T Comments
		aggregate 29% of TAG API responses greater than 15 seconds or any of the individual query type responses (ranging from 7 – 74% greater than 15 seconds) would represent acceptable performance.
		BellSouth has previously testified that the latency (turnaround time) in the TAG gateway had been tested and was measured in fractions of a second rather than the seconds interval noted in BellSouth's SQM. (Testimony of William N. Stacy, October 19, 1999, in Alabama Docket 25835 @ transcript pages 863-864).
		The Commission should direct KPMG to re-test the full range of pre-order transactions following BellSouth implementation of its software change using parity as the standard per its Order.
25	BellSouth's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.	**Comments:** BellSouth's response, despite being written in terminology designed specifically to obfuscate, clearly indicates that KPMG's findings are correct and that meaningful and re-testable resolutions will not be implemented until "March 31, 2000", "by the end of the second quarter", and "by June 30, 2000." The absence of these procedures is a grave concern and is further heightened by the recent failure of Bell Atlantic New York's ordering systems when subjected to commercial market volumes. See also AT&T's 2/28/00 letter to KPMG filed with the GAPSC.
26	BellSouth does not deliver timely Completion Notices (CNs).	**Comments:** BellSouth's response to this exception is in direct contradiction to all previous descriptions by BellSouth over the last four years that completion notices to CLECs are generated when the order obtains a status of CP (completed in the field or central office) within the Service Order Control System, not CPX or PCX (posted in the billing system or pending posting in

Exception	Report Title	AT&T Comments
		the billing system). Most recently BellSouth's description, user guide and training associated with the new CLEC Service Order Tracking System (CSOTS) reflects the fact that CLEC orders are completed when the order reaches CP status. AT&T has forwarded numerous instances of BellSouth's failure to provide CNs to its account team over the past 18 months. One particularly troubling aspect of BellSouth's failure to provide CNs is that often BellSouth has also failed to turn off its billing of AT&T's new customer. This results in customers being double/erroneously billed by BellSouth for local service that is being provided by AT&T. AT&T requests that KPMG include in its on-going analysis of missing CNs the associated impact on other processes such as DUF and customer billing of BellSouth's failure to fully complete the provisioning process through to the proper establishment of billing accounts. AT&T is also concerned with BellSouth's admission that it is not retaining logs and audit trails associated with test transactions. This failure to retain all information related to test transactions violates the test plan and casts doubt on the credibility of the test process and results. The Commission should direct that KPMG consider all situations in which BellSouth has failed to retain proper records as a test failure, and initiate re-testing.
27	BellSouth provided incorrect DUF records to KPMG.	**Comments:** AT&T will comment on this Exception at a later point in time.
28	BellSouth failed to deliver 46% of expected DUF records to KPMG	**Comments:** AT&T finds BellSouth's responses to this Exception to be particularly troubling. The most common

Exception	Report Title	AT&T Comments
		response is "Could not find any record of call, and switch recording records were not available due to the age of the calls." Here again as noted in Exception 26 above, BellSouth has failed to keep records of transactions containing known test transactions. Another common response is "Org # not UNE until (date)" which indicates that the originating telephone number was not a UNE until a date after the test call was made. Under the Directory Assistance section BellSouth's most common response is that KPMG's test line was disconnected the day before the test calls were made. It would appear that the only reasonable course of action is for the Commission to direct KPMG to re-initiate the entirety of the ODUF/ADUF Functional Evaluation BLG-2 and direct BellSouth to retain all associated switch recording records. BellSouth knew the dates upon which KPMG performed its testing; its failure to retain the required information to investigate KPMG's findings seriously compromises the test.
29	BellSouth did not deliver timely DUF records to KPMG.	**Comments:** In this exception KPMG finds, using an arbitrary four day standard, that BellSouth did not deliver DUF records to KPMG in a timely manner. In its response BellSouth states that its performance is timely when measured against a six day standard. Neither standard is appropriate. As BellSouth notes in its response it "has a requirement to be at parity with our retail operations for usage timeliness." In order to demonstrate that it is meeting its requirement, BellSouth needs to provide its actual retail usage delivery performance information. The Commission should direct BellSouth to provide its actual retail delivery interval distribution information for transport of usage to its RAO's for use in parity comparisons.

B

Master Test Plan Specific Items

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
I-2	Test bed development	• Provisioning and validation of the order/pre-order test bed is 100% complete, based on initial requirements.	• A number of test bed specifications must be changed to: a) reflect that ISDN-to-UNE and Centrex-to-UNE conversions are not electronically orderable; and b) support INP service requests. Provisioning and validation of these accounts is 79% complete.	• BLS is working on provisioning the remaining ISDN, CENTREX, and INP accounts.	• See AT&T's Comments of 2/15/00.
		• Provisioning and validation of the LNP test bed is 97% complete.	• KPMG has experienced a delay in receiving LNP CSRs from BLS.	• BLS expects to return the remaining LNP CSRs by 3/6/00.	• KPMG's problem in receiving CSR's for LNP is consistent with AT&T's experience. However, the reported resolution provides no assurance that the underlying problem has been addressed and will not recur.
		• Provisioning and validation of the RSIMMS volume test bed (for use in normal/peak volume tests) is 100% complete.	• 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.	• BLS provides daily CSR replacements for accounts no longer meeting KPMG's original requirements.	• See AT&T's Comments of 2/15/00.
I-6	EDI functional testing	• KPMG is proceeding with EDI functional testing for all UNE product types. Approximately 75% of planned orders have been submitted.	• KPMG uncovered the following: 1) A BLS system limitation with respect to UNE Loop partial migrations; 2) A constraint with respect to ordering Directory Listings (DL) with UNE Loops service requests; Loop and DL service cannot be ordered on the same service request; 3) BLS Due Dates (DD) returned on a service request confirmation are not meeting KPMG's Desired Due Date (DDD) in approximately 20% of service requests; 4) KPMG has received faxed clarifications (CLRs) in response to a	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.	• KPMG's discoveries are generally consistent with AT&T's on-going operational experience. Where these issues have resulted in Exceptions please see AT&T's comments on the Exceptions (#9 and #26). For the remaining issues AT&T requests that exceptions be issued so that BellSouth will be required to implement the necessary system changes.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
			small number of electronically-submitted service requests; • 5) A problem with the delivery of timely Completion Notices (CNs); • 6) The absence of adequate documentation on the BLS process for returning Status messages on confirmed service requests; • 7) An increasing number of inaccurate or erroneous CLRs generated by BLS ordering representatives; • 8) A BLS system problem handling coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests; BLS indicated that a system fix was implemented to conform to documented BLS business rules. KPMG continues to receive error messages indicating a DFDT is required for all coordinated hot cuts.		

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
			• KPMG is researching the following: 1) A potential BLS system problem in consistently returning Missed Appointment (MA) notices in response to service requests that could not be provisioned on the due date (as a result of CLEC or BLS readiness issues); 2) A potential TAG system problem with accepting two-word entries in the BILL CITY data element; 3) A potential BLS system problem resulting in the inability to perform order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS); 4) A potential BLS documentation problem with Directory Listing field requirements.	• KPMG and BLS are working to investigate and resolve these issues.	• KPMG's discoveries are generally consistent with AT&T's on-going operational experience. AT&T requests that exceptions be issued so that BellSouth will be required to implement the necessary system changes.
		• BLS informed KPMG that ISDN-to-UNE and CENTREX-to-UNE migrations are supported for migrations to UNE Loops only. BLS does not have documentation to support this order type.	• KPMG has submitted a revised set of test bed specifications to BLS.	• When appropriate documentation is provided to CLECs, KPMG will begin submitting service requests for ISDN-to-UNE and CENTREX-to-UNE Loop migrations.	• AT&T is concerned with BellSouth's inconsistency related to this issue -- first indicating to KPMG that these conversions could be ordered electronically, then stating that they could not (see AT&T Comments of 2/15/00). Now, BellSouth indicates that they can be ordered electronically if the conversion is to UNE loops. However that the process is undocumented. Further BellSouth's limitation of these conversions to UNE loops is meaningless in that these services require not just a loop but a port also. This appears to be an attempt by BellSouth to inappropriately restrict the purchase of these service as UNE loop + port combinations.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• BLS implemented a system fix to correct a problem with 'Outside Move' orders identified during resale validity testing. KPMG successfully re-tested this order type.	• None.	• N/A.	• NC
1-7	TAG functional testing	• KPMG is proceeding with TAG functional testing for all UNE product types. Approximately 75% of planned orders have been submitted.	• KPMG uncovered the following: 1) A BLS system limitation with respect to UNE Loop partial migrations; 2) A constraint with respect to ordering Directory Listings (DL) with UNE Loops service requests. Loop and DL service cannot be ordered on the same service request; 3) BLS Due Dates (DD) returned on a service request confirmation are not meeting KPMG's Desired Due Date (DDD) in approximately 20% of service requests; 4) KPMG has received faxed clarifications (CLRs) in response to a small number of electronically-submitted service requests; 5) A problem with the delivery of timely Completion Notices (CNs); 6) The absence of adequate documentation on the BLS process for returning Status messages on confirmed service requests; 7) An increasing number of inaccurate or erroneous CLRs generated by BLS ordering representatives; 8) A BLS system problem handling coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests. BLS indicated that a system fix was	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.	• TAG and EDI ordering functionalities are designed to mirror each other. Each interface processes orders using the same industry standard guidelines and BellSouth specific business rules. • KPMG's discoveries are generally consistent with AT&T's on-going operational experience. Where these issues have resulted in Exceptions please see AT&T's comments on the Exceptions (#9 and #26). For the remaining issues AT&T requests that exceptions be issued so that BellSouth will be required to implement the necessary system changes.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
			implemented to conform to documented BLS business rules; KPMG continues to receive error messages indicating a DFDT is required for all coordinated hot cuts.		
			• KPMG is researching the following: 1) A potential BLS system problem in consistently returning Missed Appointment (MA) notices in response to service requests that could not be provisioned on the due date (as a result of CLEC or BLS readiness issues); 2) A potential BLS system problem resulting in the inability to perform order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS); 3) A potential BLS documentation problem with Directory Listing field requirements.	• KPMG and BLS are working to investigate and resolve these issues.	• TAG and EDI ordering functionalities are designed to mirror each other. Each interface processes orders using the same industry standard guidelines and BellSouth specific business rules. • KPMG's discoveries are generally consistent with AT&T's on-going operational experience. AT&T requests that exceptions be issued so that BellSouth will be required to implement the necessary system changes.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• BLS has informed KPMG that ISDN-to-UNE and CENTREX-to-UNE migrations are supported for migrations to UNE Loops only. BLS does not have documentation to support this order type.	• KPMG has submitted a revised set of test bed specifications to BLS.	• When appropriate documentation is provide to CLECs, KPMG will begin submitting service requests for ISDN-to-UNE and CENTREX-to-UNE Loop migrations.	• AT&T is concerned with BellSouth's inconsistency related to this issue – first indicating to KPMG that these conversions could be ordered electronically, then stating that they could not (see AT&T Comments of 2/15/00). Now, BellSouth indicates that they can be ordered electronically if the conversion is to UNE loops. However that the process is undocumented. Further BellSouth's limitation of these conversions to UNE loops is meaningless in that these services require not just a loop but a port also. This appears to be an attempt by BellSouth to inappropriately restrict the purchase of these services as UNE loop + port combinations.
		• BLS implemented a system fix to correct a problem with 'Outside Move' orders identified during resale validity testing. KPMG successfully re-tested this order type.	• None.	• N/A.	• NC
		• Approximately 85% of planned TAG pre-orders have been submitted.	• KPMG uncovered the following: • 1) A problem with the timeliness of pre-order responses; • 2) BLS's pre-order business rules do not contain information on the inputs or outputs for Calculate Due Date (CDD) pre-order queries.	• BLS is working to address these issues.	• See AT&T's comments on Exception #24.
I-8	CRIS/CABS Invoicing Functional Test	• KPMG has completed validation of UNE bills and is analyzing the results.	• KPMG filed Exception 16 with the GA-PSC, indicating that BLS issued multiple bills containing erroneous information to the KPMG CLEC.	• KPMG expects BLS to provide an amended response to this exception. Subsequent to evaluating BLS's amended response, KPMG will engage in re-testing activities.	• AT&T has also experienced numerous UNE billing problems with BellSouth. Also see AT&T's comments on Exception #16.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG has completed BLG-1: CRIS/CABS Invoicing Functional Test.	• None.	• KPMG is preparing a final test report detailing its findings.	• Final reports should not be generated with open exceptions. AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.
II-1	Metrics	• KPMG is updating the calculation validation programs to apply to November and January PMAP-generated SQM values for the KPMG CLEC.	• KPMG has found some potential discrepancies between the values KPMG calculated and values reported by BLS.	• KPMG is investigating these potential discrepancies with BLS.	• KPMG's discoveries are generally consistent with AT&T's on-going operational experience. AT&T requests that exceptions be issued so that BellSouth will be required to implement the necessary fixes.
		• KPMG continues to investigate the discrepancies found as a result of replication of the majority of October and November non-PMAP-generated SQM values for the CLEC aggregate.	• KPMG found some discrepancies between the values KPMG calculated and values reported by BLS.	• KPMG forwarded a draft exception to BLS. BLS provided KPMG an initial response to this draft exception. KPMG expects to file this draft exception with the GA-PSC on 3/06/00. KPMG and BLS are currently investigating the issues raised in this exception.	• See AT&T's comments on Exception #23.
II-4	Volume test	• KPMG continues to submit sample Resale and UNE test cases into the RSIMMS environment to test connectivity and transaction tracking capabilities.	• A lack of facilities information and dynamic test bed accounts have limited progress.	• BLS is working to provide KPMG the required resources to complete preparation for the test.	• See AT&T's comments of 2/15/00.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG is preparing to test LNP functionality in the RSIMMS environment.	• None.	• KPMG expects to perform this test during the week of 3/06/00.	• AT&T has repeatedly expressed its concerns regarding the performance of these volume tests in an off-line, non-production, simulated environment. These concerns are further heightened by the recent failure of Bell Atlantic New York's ordering systems when subjected to commercial market volumes. Therefore AT&T requests that BellSouth's actual ordering systems be subjected to volume and stress testing. To alleviate concerns regarding potential customer impact, such tests could be performed in off-hours. See also AT&T's 2/28/00 letter to KPMG.
		• KPMG was unable to successfully submit SL2 orders into the RSIMMS test environment.	• BOCABS was not connected to the RSIMMS environment.	• BLS recently added BOCABS to the RSIMMS environment. KPMG expects to test this functionality during the week of 3/06/00.	• Same comment as above.
		• The RSIMMS environment does not have auto reply functionality (the capability to accept functional acknowledgments generated by a CLEC).	• Transactions may be lost during testing if a CLEC's system is temporarily down.	• BLS is adding auto reply to the RSIMMS environment.	• Same comment as above.
II-5	Change management	• KPMG attended BLS's Change Control Steering Committee workshop on 2/16 and 2/17/00. During this workshop, the five participating CLECs provided input and recommendations to BLS regarding preparation of a revised change management process. During a follow-up teleconference on 2/29/00, BLS provided CLECs with updates on their recommendations.	• None.	• N/A.	• AT&T continues to have concerns both with the proposed interim process under discussion and with its implementation. AT&T has submitted several new defect requests under the new process only to have BellSouth unilaterally reclassify them to a less urgent status in violation of its own proposed process. See attached Emails.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG has completed document reviews of current BLS change management processes and their posted change notifications.	• KPMG issued an exception on 11/23/99 asserting that BLS's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.	• KPMG expects delivery of BLS's revised formal change management process documentation in early March. KPMG will use this revised documentation to begin re-testing activities for CM-1: Change Management Practices Review.	• Documentation of the proposed interim process is incomplete. The next discussion is now scheduled for March 23, 2000.
III-1	Flow-Through Evaluation	• As a result of KPMG's investigation of LSRs that received a "Z" processing status or were reported as flow-through despite falling out after reaching SOCS, KPMG issued Exception 21.	• A small percentage of LSRs reported as flow-through appear to have fallen out after reaching SOCS in each of the months validated.	• Based on flow through changes made by BLS, KPMG expects to perform re-testing activities during the week of March 15th.	• See AT&T comments on Exception #21 and #22.
		• KPMG reviewed a sample of LSR fallout for correct categorization.	• KPMG posed several questions to BLS SMEs regarding flow-through and order processing.	• BLS is researching the questions raised during the LSR fallout review.	• AT&T requests more specific information so that it may understand and comment on these issues.
		• KPMG's reconciliation of overall flow-through experienced by CLECs in the nine-state region against BLS reporting is complete.	• None.	• KPMG will incorporate the results of this review into findings for the Flow-Through Evaluation.	• It is unclear what "reconciliation" means in this context. Unless KPMG is referring to replication of the report, it is unclear how this work can be completed with open Exceptions.
		• KPMG met with CLECs to discuss flow through reporting.	• KPMG is researching questions raised during CLEC interviews related to documentation of the flow-through process and access to the flow-through report on the PMAP web page.	• KPMG will incorporate the results of these interviews into findings for the Flow-Through Evaluation.	• AT&T seeks clarification from KPMG that its comments here do not imply that issues identified through CLEC interviews will not be considered for future Exception Reports.
III-2	CLEC Participation – Ordering	• KPMG is proceeding with UNE-LNP and CLEC-to-CLEC migration orders using CLEC-provided facilities.	• KPMG has uncovered a potential BLS system limitation with performing CLEC-to-CLEC migrations.	• KPMG and BLS are working to investigate and resolve this issue.	• AT&T requests additional and specific information so that it may understand and comment on these issues.

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Attachment B

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
III-3	Capacity Management	• KPMG reviewed BLS documentation regarding Mainframe CPU Utilization and Trending Graph/Reports, EDI Monthly Volume Reports, EDI Monitoring Procedures Documentation, and Billing application flows.	• None.	• N/A.	• NC
		• KPMG has completed PRE-6: Pre-Order Processing Systems Capacity Management Evaluation, O&P-6: Order Processing Systems Capacity Management Evaluation, BLG-3: Billing Systems Capacity Management Evaluation, M&R-5: TAFI Capacity Management Evaluation, and M&R-6: ECTA Capacity Management Evaluation.	• None.	• KPMG is preparing a final test report detailing its findings.	• See AT&T's comments on Exception #25 • AT&T does not understand how final reports can be generated when open exceptions exist. AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.
IV-1	TAFI Functional & Documentation Testing	• KPMG has completed M&R-1: TAFI Functional Test.	• None.	• KPMG is preparing a final test report detailing its findings.	• AT&T does not understand how final reports can be generated when open exceptions exist. AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.
		• KPMG has completed M&R-8: TAFI Documentation Evaluation.	• None.	• KPMG is preparing a final test report detailing its findings.	• AT&T does not understand how final reports can be generated when open exceptions exist. AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
IV-2	ECTA Functional Testing	• KPMG has completed ECTA Functional Testing for the Mechanized Line Test function (MLT).	• None	• N/A.	• NC
		• KPMG has completed M&R-2: ECTA Functional Test.	• None.	• KPMG is preparing a final test report detailing its findings.	• AT&T does not understand how final reports can be generated when open exceptions exist. AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.
		• KPMG has completed M&R-3: ECTA Normal Volume Performance Test.	• None.	• KPMG is preparing a final test report detailing its findings.	• AT&T does not understand how final reports can be generated when open exceptions exist. AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.
		• KPMG has completed M&R-4: ECTA Peak Volume Performance Test.	• None.	• KPMG will prepare a final test report detailing its findings.	• AT&T does not understand how final reports can be generated when open exceptions exist. AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.
IV-3	ODUF/ADUF Usage Functional Test	• KPMG forwarded several draft exceptions to BLS based on its analysis of test results. KPMG is currently reviewing BLS's responses to these draft exceptions[2]	• KPMG noted several issues, including: 1) Receipt of incorrect DUF records; 2) Failure to deliver 46% of DUF records; 3) Failure to deliver timely DUF records.	• KPMG expects to determine whether to file exceptions with the GA-PSC shortly. KPMG will engage in re-testing activities as necessary.	• AT&T will comment on these exceptions (27, 28, and 29) when they are posted to the GAPSC web site.
		• KPMG has completed BLG-2: ODUF/ADUF Usage Functional Test	• None.	• KPMG is preparing a final test report detailing its findings.	• AT&T does not understand how final reports can be generated when open exceptions exist

AT&T Comments on March 3, 2000, KPMG Interim Report
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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
IV-4	CRIS/CABS Invoicing Documentation Evaluation	• KPMG has completed BLG-5: CRIS/CABS Invoicing Documentation Evaluation.	• None.	• KPMG will prepare a final test report detailing its findings.	• AT&T reiterates its request that CLECs be provided more participation in the process, including the ability to view and comment on draft final reports as was the practice in New York.
IV-5	Exceptions²	• KPMG's Exception #1, regarding Pre-ordering, will undergo further review based on information which will be provided by BLS.	• KPMG indicated that BLS does not currently provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.	• BLS provided updated business rule documentation on 2/08/00. Business rule information regarding CDD query types was not included in the update. Subsequent to BLS's delivery of pre-order business rules which include CDD query type rules, KPMG will perform re-testing activities.	• See AT&T's 12/9/1999 Comments
		• KPMG is awaiting new change management procedures from BLS in order to conduct re-testing of Exception #2, regarding Change Management.	• KPMG indicated that BLS's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.	• BLS is currently reviewing proposed change management procedures with the CLEC community. After completion of this review process, KPMG will begin re-testing activities.	• See AT&T's 12/9/1999 Comments
		• KPMG filed a closure report for Exception #3, regarding Performance Measurements, with the GA-PSC on 2/25/00.	• KPMG indicated that CLECs are not notified when BLS initiates changes to published historical performance measurement reports and/or raw data files associated with these reports after this information has been removed from the PMAP web site.	• In its closure report, KPMG noted that BLS enhanced its Notification Procedure to include reports that have already been removed from the PMAP web site. This enhancement was documented in the PMAP User's Guide and the web site. Additionally, BLS documented its commitment to respond to all CLEC requests for updated reports within 48 hours. KPMG has suggested that the GA-PSC continue to monitor the site to observe the processing of any change events.	• See accompanying AT&T Exception Reports Comments Matrix

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG is currently reviewing the initial draft of a closure report for Exception #4, regarding Ordering & Provisioning.	• KPMG indicated that TAG and EDI do not provide the functionality required for submitting partial migration service requests for loop-port combinations.	• In its closure report, KPMG noted that BLS implemented a coding change to address the exception on 1/17/00. In re-testing, KPMG discovered that partial migration service requests for loop-port combinations can now be successfully submitted via TAG and EDI.	• See AT&T's 2/15/2000 Comments
		• KPMG filed a closure report for Exception #5, regarding Ordering & Provisioning, with the GA-PSC on 2/25/00.	• KPMG indicated that BLS's rules for submitting supplements to existing service orders are not accurately defined.	• In its closure report, KPMG noted that BLS updated the *Local Exchange Ordering Implementation Guide* to define fields that cannot be changed via a supplement. BLS posted the updated document to its web site on 1/31/00.	• See accompanying AT&T Exception Reports Comments Matrix
		• To address KPMG's Exception #6, regarding Maintenance and Repair, BLS forwarded new TAFI documentation to KPMG on 3/01/00.	• KPMG indicated that multiple instances of inaccuracies in TAFI documentation and deficiencies in distribution of updates have been identified.	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.	• See AT&T's 2/15/2000 Comments
		• KPMG is currently reviewing the initial draft of a closure report for Exception #7, regarding Ordering and Provisioning.	• KPMG indicated that the BLS ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.	• In re-testing, KPMG noted that BLS implemented a system fix which allows CLECs to process trouble reports for SL1 circuits. KPMG verified this system fix by re-submitting several trouble reports for SL1 circuits.	• See AT&T's 2/15/2000 Comments
		• KPMG filed a closure report for Exception #8, regarding Maintenance and Repair, with the GA-PSC on 2/25/00.	• KPMG indicated that Firm Order Confirmations (FOCs) are issued by BellSouth on CLEC service orders before facility status has been determined.	• In its closure report, KPMG noted that BLS claimed that CLECs receive parity of service with BLS retail customers. Through interviews with BLS personnel, KPMG verified that parity exists.	• See accompanying AT&T Exception Reports Comments Matrix

AT&T Comments on March 3, 2000, KPMG Interim Report
March 22, 2000

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG filed Exception #9, regarding Ordering & Provisioning, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that BellSouth failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.	• Based on BLS's response, KPMG is currently performing re-testing activities. Further action will be predicated on re-testing results, which are expected to be available in mid-March.	• See AT&T's 2/15/2000 Comments and see accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #10, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described in the *CLEC TAFI End-User Training and User Guide.*	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #11, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that the host request error and reset communications functions do not operate as described in the *CLEC TAFI End-User Training and User Guide.*	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #12, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.	• BLS expects to implement a system fix in the new version of ECTA scheduled to be released on 4/14/00. KPMG will perform re-testing activities subsequent to this release.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #13, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities. KPMG will complete re-testing activities after BLS performs necessary system edits.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #14, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/08/00.	• KPMG indicated that BLS TAFI applications do not allow CLECs to process trouble reports for ISDN lines as described in the *CLEC TAFI End-User Training and User Guide.*	• Based on the new TAFI documentation, KPMG is currently performing re-testing activities.	• See accompanying AT&T Exception Reports Comments Matrix

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AT&T Comments on March 3, 2000, KPMG Interim Report
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Ref	Item	Status	Issues	Next Step/Resolution	AT&T Comments
		• KPMG is currently reviewing the initial draft of a closure report for Exception #15, regarding Maintenance & Repair.	• KPMG indicated that under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.	• KPMG filed Exception[2] 15 and BLS's response with the GA-PSC on 2/17/00. Exception 15 occurred due to BLS system purges occurring once every 30 days. In response, BLS now purges the relevant system every two days.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #16, regarding Billing, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BellSouth issued multiple bills containing erroneous information to KPMG.	• KPMG expects BLS to provide an amended response to this exception. Subsequent to evaluating BLS's amended response, KPMG will engage in re-testing activities.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #17, regarding Change Management, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BLS's change management process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site allows for defects in postings.	• KPMG expects BLS to develop a plan to address this exception. Subsequently, KPMG will engage in re-testing activities.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #18, regarding Ordering and Provisioning, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BLS's requirements for values entered in the Line Class of Service data element for EDI and TAG are not consistent, and the documentation is incomplete.	• KPMG expects BLS to provide an amended response to this exception. Subsequent to evaluating BLS's amended response, KPMG will engage in re-testing activities.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #19, regarding Metrics, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BLS does not adequately document changes in versions of the BLS Service Quality Measurements Performance Reports.	• On 3/01, BLS published two versions of the SQM Performance Reports, one "clean" version and one with changes shown. BLS will also provide a change summary page, which will detail changes made from previous versions. KPMG will complete re-testing subsequent to the publication of a change summary page.	• See accompanying AT&T Exception Reports Comments Matrix

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG filed Exception #20, regarding Maintenance and Repair, and BLS's response with the GA-PSC on 2/25/00. KPMG is currently reviewing the initial draft of a closure report for this exception.	• KPMG indicated that BLS technicians cannot initiate a Verify Repair Completion request.	• BLS instituted a system fix, which allows technicians to initiate a Verify Repair Completion request.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #21, regarding Flow Through, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that a small percentage of Local Service Requests (LSRs) were improperly categorized for Percent Flow Through Service Request Reports.	• BLS has indicated that a system fix has been implemented to address this exception. KPMG expects to perform re-testing activities in mid-March, subsequent to the release of the February Flow Through report.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG filed Exception #22, regarding Ordering & Provisioning, and BLS's response with the GA-PSC on 2/25/00.	• KPMG indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.	• BLS indicated that a system fix was implemented in late February. Subsequently, during re-testing, KPMG discovered that a related error occurred. KPMG provided the PON of this particular service order to BLS for investigation.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG submitted a Draft Exception, regarding Metrics, to BLS on 2/15/00.	• KPMG indicated that it cannot replicate five of BellSouth's reported Service Quality Measurements.	• BLS forwarded an initial response to KPMG on 2/21/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 2/16/00.	• KPMG indicated that BLS failed to deliver 46% of expected DUF records to KPMG.	• BLS forwarded an initial response to KPMG on 2/24/00. KPMG expects to file this exception with the GA-PSC during the week of 3/06/00.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG submitted a Draft Exception, regarding Capacity Management, to BLS on 2/16/00.	• KPMG indicated that BLS's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.	• BLS forwarded an initial response to KPMG on 2/24/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.	• See accompanying AT&T Exception Reports Comments Matrix

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Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 2/16/00. h	• KPMG indicated that BLS does not deliver timely Completion Notices (CNs).	• BLS forwarded an initial response to KPMG on 2/24/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG submitted a Draft Exception, regarding Pre-Ordering, to BLS on 2/22/00.	• KPMG indicated that BLS's TAG API does not deliver timely responses to pre-order transactions.	• BLS forwarded an initial response to KPMG on 2/28/00. KPMG expects to file the exception and BLS's response with the GA-PSC on 3/06/00.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 2/22/00.	• KPMG indicated that BLS did not deliver timely DUF records to KPMG.	• BLS forwarded an initial response to KPMG on 2/28/00. KPMG is currently evaluating BLS's response.	• See accompanying AT&T Exception Reports Comments Matrix
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 2/23/00.	• KPMG indicated that BLS provided incorrect DUF records to KPMG.	• BLS forwarded an initial response to KPMG on 2/28/00. KPMG is currently evaluating BLS's response.	• See accompanying AT&T Exception Reports Comments Matrix
V-1	Maintenance and Repair End-To-End Functional Testing	• KPMG has completed a test of ISDN-BRI lines.	• None.	• KPMG is incorporating the results into its end-to-end testing analysis.	• AT&T seeks clarification as to how KPMG has been able to complete this test, which requires the input of an ISDN trouble into TAFI when as noted in Exception 14, such input is not possible.
V-2	Provisioning Verification	• KPMG has completed interviews with BellSouth Personnel to understand the provisioning process.	• None.	• N/A.	• NC
		• KPMG has conducted interviews with AT&T, ITC DeltaCom, and NextLink to examine provisioning from the CLEC Perspective.	• None.	• KPMG is scheduling additional interviews with CLECs.	• NC
		• KPMG is continuing provisioning verification activities for transactions initiated during TAG and EDI functional testing.	• Verification activities include site inspections, validation of switch translations, DL confirmation, LNP confirmation, and post-activity CSR runs by BLS personnel.	• Verification activities will continue through the completion of EDI and TAG functional testing.	• NC

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Attachment B

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	• KPMG has instituted a test process whereby the *BLS Documentation Issues Report* is submitted to BLS representatives. The report is then reviewed and updated via a weekly conference call.	• KPMG uncovered the following: • 1) Potential documentation problems relating to ordering SL1 and SL2 loops using BI1, BAN1, BI2 and BAN2; • 2) Potential problems with requirements for the LOCBAN field for loop migrations	• KPMG and BLS continue to research these issues.	• AT&T requests that the *BLS Documentation Issues Report* and BellSouth's responses be made available to the CLECs when they are produced. These issues directly impact CLECs customers on a daily basis. Additionally CLEC's should be granted "observer" status on these weekly conference calls. • AT&T seeks clarification as to whether the issues listed by KPMG in Reference VII-1 below are included in the process described here.
		• KPMG has conducted interviews with CLEC personnel to understand BLS documentation clarity, accuracy and availability from the CLEC perspective.	• None.	• N/A.	• NC
		• KPMG has completed a review of the *LEO Guide, Volume 1, Version N* and is analyzing the results.	• KPMG noted several problems during its review of the *LEO Guide, Volume 1, Version N.*	• Reference VII-1 of this report – "Local Exchange Ordering (LEO) Guide Documentation Issues" - details problems raised by KPMG which BLS will address in the subsequent issue of the *LEO Guide, Version 7O.*	• AT&T understands that this new documentation is scheduled for publication on April 7, 2000. AT&T seeks information about KPMG's plans to re-test following publication and implementation.
V-4	ODUF/ADUF Documentation Evaluation	• KPMG has completed BLG-6: ODUF/ADUF Documentation Evaluation.	• None.	• KPMG will prepare a final test report detailing its findings.	• NC
VII-1	*Local Exchange Ordering (LEO) Guide Documentation Issues*	• Data Element Definition: *Reference Number*	• In the Directory Listings Service form, the field REFNUM reflects only Req Type J as required. An error message is received if the field is not populated.	• In *LEO Guide, Version 7O,* the REFNUM matrix will be revised, and REFNUM will be listed as "001" on LN.	• AT&T understands that this new documentation is scheduled for publication on April 7, 2000. AT&T seeks information about KPMG's plans to re-test following publication and implementation.

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		Data Element Definition: *Transfer of Calls to Primary Number, Transfer of Calls to Secondary Number*	• The LOOP w/NP, TCTO-Primary and TCTO-Secondary fields are shown as N/A for all REQTYP/ACT. However, Note 1 states it is required when "TC OPT=21, 31, or 81", which indicates these fields are conditional.	• In *LEO Guide, Version 7O*, a note will be added which will detail: 1) These fields are conditional for interim number portability – for ReqTyp B Activity Types, A, C, D, MT, T, R, SS, RS, W; 2) These fields are prohibited for ReqType V at line level.	• Same comment.
		Data Element Definition: *Transfer of Calls to Primary Name, Transfer of Calls to Secondary Name*	• The LOOP w/NP, TCTO-Primary and TCTO-Secondary fields are shown as N/A for all REQTYP/ACT. However, Note 1 states it is required when "TC OPT=21, 31, or 81", which indicates these fields are conditional.	• In *LEO Guide, Version 7O*, a note will be added which will detail: 1) These fields are conditional for interim number portability – for ReqTyp B Activity Types, A, C, D, MT, T, R, SS, RS, W; 2) These fields are prohibited for ReqType V at line level.	• Same comment.
		Data Element Definition: *Transfer of Calls Period Century Code/Transfer of Calls Period Date*	• The LOOP w/NP, TCTO-Primary and TCTO-Secondary fields are shown as N/A for all REQTYP/ACT. However, Note 1 states it is required when "TC OPT=21, 31, or 81", which indicates these fields are conditional.	• In *LEO Guide, Version 7O*, a note will be added which will detail: 1) These fields are conditional for interim number portability – for ReqTyp B Activity Types, A, C, D, MT, T, R, SS, RS, W; 2) These fields are prohibited for ReqType V at line level.	• Same comment.
		Data Element Definition: *Design Routing Code*	• The LSR form, DRC for ReqType A Activity V, Note 2 states that "this field is applicable when the service is designed." For SL2 orders, the code then must be entered. BSL informed KPMG that this field is not necessary.	• In *LEO Guide, Version 7O*, a note will be added stating that the DRC is not required to have orders issued.	• Same comment.
		Data Element Definition: *Account Name, Account Telephone Number*	• Errors were received on orders submitted following the conditional rules outlined in the documentation. Based on a call to BLS's Help Desk, ATN and EATN fields are required for LNP Full Migration with DL.	• In *LEO Guide, Version 7O*, a note will be added stating ATN and EATN are required for LNP Full Migration when DL Form is populated.	• Same comment.

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• Data Element Definition: *Requisition Type*	• In the LSR Form, REQTYP is defined as two, 2-alpha characters. Table A defines the first character. No definition of the second character is provided. Per BLS's Help Desk, the second character is always "B".	• In *LEO Guide, Version 7O*, a definition will be added that the second character is always "B".	• Same comment.
		• Data Element Definition: *Implementation Contact*	• In the LSR form, ReqType A, Activity type A, the IMPCON field is optional. An error was received stating that this field is required. Per BLS's Help Desk, this field is conditional.	• In *LEO Guide, Version 7O*, this field will be marked as conditional on the LSR form for ReqType A, Activity Type A.	• Same comment.

Supplemental Test Plan Specific Items

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
VII-2	Test Bed Development	• Provisioning and validation of the resale test bed is 19% complete.	• KPMG provided BLS with modified test bed specifications.	• BLS will send KPMG the balance of the CSRs matching KPMG's modified specs.	• See AT&T's previous Comments on the STP Version 1.0 dated 1/31/2000 and AT&T's letter to KPMG of 3/7/2000 filed with the Commission regarding STP Version 1.1.
VII-3	Detailed Test Plan Development	• KPMG is currently drafting the TAFI Functional Resale Detailed Test Plan.	• The detailed test plan will be completed subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.	• Same comment.
		• KPMG is currently drafting the ECTA Functional Resale Detailed Test Plan.	• The detailed test plan will be completed subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.	• Same comment.
		• KPMG is currently drafting the End-to-End xDSL Detailed Test Plan.	• The detailed test plan will be completed subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.	• Same comment.
		• KPMG has completed and submitted for peer review the Detailed Test Plan for CM-2: OSS '99 Release Evaluation.	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.	• Same comment.

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Attachment B

Ref	Item	Status	Issues	Next Step Resolution	AT&T Comments
		• KPMG has completed and submitted for peer review the detailed test plan for Work Center Capacity Management (xDSL).	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• KPMG will complete the detailed test plan and begin testing activities.	• Same comment.
		• KPMG has completed and submitted for peer review the detailed test plan for ADSL Systems Capacity Management.	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• After the STP receives final approval from the GA-PSC, KPMG will complete the detailed test plan and begin testing activities.	• Same comment.
		• KPMG has completed and submitted for peer review the detailed test plan for xDSL.	• The detailed test plan will be finalized subsequent to the GA-PSC's final approval of the STP.	• After the STP receives final approval from the GA-PSC, KPMG will complete the detailed test plan and begin testing activities.	• Same comment.
VII-4	Metrics	• KPMG is currently replicating the calculations of PMAP-generated and non-PMAP-generated SQMs for the CLEC aggregate and BellSouth retail.	• KPMG is investigating some potential discrepancies between the values calculated by KPMG and the values reported by BLS.	• Based on any subsequent direction from the GA-PSC, KPMG will modify Metrics testing as necessary.	• AT&T seeks clarification regarding what type of subsequent direction is contemplated by KPMG. Will the STP be further modified to reflect this subsequent direction and will CLECs have an opportunity to comment?.
		• KPMG has reviewed the definitions of PMAP-generated and non-PMAP-generated SQMs.	• None.	• Based on any subsequent direction from the GA-PSC, KPMG will modify Metrics testing as necessary.	• Same comment.
		• KPMG has reviewed the data flow process through legacy/source, PMAP, and other related BLS systems.	• None.	• Based on any subsequent direction from the GA-PSC, KPMG will modify Metrics testing as necessary.	• Same comment.

C

Attachment C
Change Control Emails

From:	jrwilliamson@att.com
Sent:	Thursday, March 02, 2000 3:55 PM
To:	sr271lib@lga.att.com; bradbury@att.com; kmcallorum@att.com; bkgrant@att.com; bobik@att.com; grady@att.com; mlacy@att.com; bseigler@att.com; patpowell@att.com; augier@att.com; follensbee@att.com; donaldcrosby@lga.att.com; jimcampbell@att.com; bpeacock@att.com
Subject:	FW: ESCALATION - DEFECT - Room Field
Importance:	High

🖼
Room Field Defect doc

> -----Original Message-----
> From: Williamson, Jill R, NCAM
> Sent: Thursday, March 02, 2000 3:51 PM
> To: 'Valerie Cottingham'
> Cc: 'Linda W. Tate'; 'Shelton-Williams, Beverly'
> Subject: ESCALATION - DEFECT - Room Field
> Importance: High
>
> Valerie,
>
> This is to escalate a defect request I sent to Change Control yesterday at
> 1:30 pm. BellSouth's proposed Defect Process suggests that I should have
> received confirmation of my request within 1 business day. I have yet to
> receive any feedback or status from BellSouth on this issue and have
> already missed the customer's due date. I need BellSouth to process this
> customer's order immediately and advise AT&T as to when the defect will be
> corrected. Additionally, I need BellSouth to provide AT&T with an interim
> solution for this problem until the defect is corrected.
>
> Jill Williamson
> AT&T Local Services and Access Management
>
> -----Original Message-----
> From: Williamson, Jill R, NCAM
> Sent: Wednesday, March 01, 2000 1:29 PM
> To: 'Change.Control@bridge.bellsouth.com'
> Cc: 'Linda W. Tate'; 'Shelton-Williams, Beverly'
> Subject: DEFECT - Room Field
> Importance: High
>
> Valerie,
>
> Attached is a BellSouth defect I need you address immediately.
>
> Jill Williamson
> AT&T Local Services and Access Management
>
> <<Room Field Defect.doc>>

1

ATTACHMENT C page 1

ⓐ *BELL*SOUTH

Change Request Form

Internal Reference # _____(1)   Date Change Request Submitted _3_/_1_/_00(2)

☐ TYPE 5 (CLEC)   ☐ TYPE 4 (BST)   ☐ TYPE 3 (INDUSTRY)   ☐ TYPE 2 (REGULATORY) (3)

☒ DEFECT (3A)

Company
Name___AT&T_____(4)

CCM___Jill Williamson_____(5)   Phone__404-810-8562_____(6)

CCM Email Address _jrwilliamson@att.com____(7)   Fax__404-810-8562_____(8)

Alternate CCM_ _____(9)   Alt Phone # _____(10)

Originator's Name _Jill Williamson_____(11) Phone_404-810-8562_____(12)

Title of Change ____Room Field Defect_____(13)

Category ☐ Add New Functionality   ☒ Change Existing (14) Desired Due Date 3/3/00 (15)

Originating CCM assessment of impact   ☒ Major   ☐ Minor   ☐ None expected (16)

Originating CCM assessment of priority   ☒ Urgent   ☐ High   ☐ Medium   ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☒ Ordering ☒ EDI ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)		
☐ Software	☐ Hardware	☐ Industry Standards
☐ Product & Services	☒ New or Revised Edits	☐ Process
☐ Documentation	☐ Regulatory	☒ Other

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)
Using OSS'99, AT&T has been attempting to send an order for a customer to migrate a loop with LNP, but continues to get rejected for the "ROOM" field. AT&T has pulled the customer's CSR and AV, which show the customer's room number to be "Suit 509-B". The ROOM field will only allow nine (9) characters, thus causing a reject on the order. The first reject we received stated that the Suit info is incomplete. The LCSC told us to put the Suite information in the SADLOC field as a workaround. AT&T tried this and got a reject saying the Suite information belongs in the Room field. We were then told to put the information in the Room field and leave out the space (including a space is part of the business rule). The PON number in the above example is ZXMIAY0000180A. PON originally sent on 2/9/00, with a due date 2/24/00. First, I need BellSouth to get this order worked so that the customer can be ported. Additionally, I need BellSouth to fix its defect and provide us with an interim workaround by 3/3/00.

Attachment A-1

Jointly Developed by the EI Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

ATTACHMENT C page 2

⊕ *BELLSOUTH*

Change Request Form

Known dependencies (21)

_____

_____

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

_____

_____

_____

_____

This Section to be completed by BCCM only.

Change Request Log #_____(23)   Clarification ☐ Yes ☐ No (24)

Clarification Request Sent ___/___/___ (25)   Clarification Response Due ___/___/___ (26)

Status _____(27)

Change Request Review Date __/__/__(28)   Target Implementation Date ___/___/__ (29)

Last Modified By _____ (30)   Date Modified ___/___/___ (31)

Review Results (32)

_____

_____

_____

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____

_____

_____

Agreed Release Date ___/___/___ (37)   CMVC #_____(38)
                                              DDTS#_____(39)

Attachment A-1

Jointly Developed by the EI Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

ATTACHMENT C page 3

From:	jrwilliamson@att.com
Sent:	Monday, March 06, 2000 9:56 AM
To:	augier@att.com; sr271lib@lga.att.com; bradbury@att.com; bseigler@att.com; mlacy@att.com; patpowell@att.com; mrule@att.com; eppsteiner@att.com; tbyrnes@att.com; kmcallorum@att.com; bkgrant@att.com; bobik@att.com; grady@att.com
Subject:	FW: DEFECT - ROOM
Importance:	High

-----Original Message-----
From: Williamson, Jill R, NCAM
Sent: Monday, March 06, 2000 9:54 AM
To: 'Change.Control@bridge.bellsouth.com'
Cc: Pat.A.Rand@bridge.bellsouth.com;
Beverly.Sheltonwilliams@bridge.bellsouth.com;
Linda.Tate3@bridge.bellsouth.com
Subject: RE: DEFECT - ROOM
Importance: High

Valerie,

I did have a discussion with Linda regarding this issue on Friday, but I
didn't get the sense that anything had been resolved. Linda did tell me
that the fix would be going in on April 15, but she didn't have the
workaround identified. I asked Linda to let us know what the workaround
would be as quickly as possible and that BellSouth go ahead an work our
order that is currently in limbo because of the defect. I still do not have
a status on my customer's order (PON ZXMIAY0000180A).

Jill Williamson
AT&T Local Services and Access Management

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Friday, March 03, 2000 9:42 PM
To: Williamson, Jill R, NCAM
Cc: Pat.A.Rand@bridge.bellsouth.com;
Beverly.Sheltonwilliams@bridge.bellsouth.com;
Linda.Tate3@bridge.bellsouth.com
Subject: DEFECT - ROOM
Importance: High

Jill,
Thank you so much for bringing this to my attention. I apologize for not
getting back to you sooner. However, I do understand that you spoke with
Linda, and an agreement had been reached to fix this problem by expanding
the
character length.

In the mean time, Pat Rand is coordinating some testing to provide
information
for a workaround so that your LSRs can be submitted electronically. We
should
be able to provide this to you on Monday.

Thanks,
Valerie Cottingham
BCCM - Director

ATTACHMENT C page 4

From:	Change.Control@bridge.bellsouth.com
Sent:	Thursday, March 09, 2000 12:47 AM
To:	sharon.arnett@mail.sprint.com; TLA@magicnet.net; PBarker@aol.com; PBohn@mediaone.com; sbowling@caprock.com; dbraun@adelphia.com; tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com; mconquest@itcdeltacom.com; CPolizzotti@northpoint.net; Jdavid4715@aol.com; DoBeck@mediaone.com; JDoherty@accessone.cc; Craig.B.Douglas@mci.com; kelley.dunne@onepointcom.com; jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com; george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com; lhall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com; sjenning@nowcommunications.com; Sandrajf@intetech.com; Pkingborn@eztalktelephone.com; wmknapek@intermedia.com; dlasher@eftia.com; JMMaxwell@intermedia.com; c_and_m@bellsouth.net; Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com; Lminasola@mediaone.com; wmontano@uslec.com; Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com; allison.oneill@wcom.com; Debra.Pasquale@btitele.com; dpetry@ix.netcom.com; brian.powers@onepointcom.com; microsun@bellsouth.net; cheryl@eatel.com; jeffrey@cellularsouth.com; srober@kmctelecom.com; davidr@omnicall.net; sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com; donnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM; Mark.E.Turner@mci.com; tvercellotti@mantiss.com; WWalker@mantiss.com; Kimberly.O.Williams@mci.com; Williamson,Jill R - NCAM; Wilson Jr,Jack T (Tom) - BGM; wolfsbrg@cris.com
Subject:	DEFECT NOTIFICATION
Importance:	High

```
 ☒ ⌐
DEFNOT-1.DOC
```

Attention CLECS:

On 3/1/00 a defect was brought to BellSouth's attention. Attached is an explanation of the defect, the proposed date of resolution, and the workaround
to use until the defect is corrected. As you know, this is one of the items that discussed on the 3/7/00 call covering the initial user requirements.

Thanks!

Pat/Valerie
BCCM

1

ATTACHMENT C page 5

⊕ **BELL**SOUTH

DRAFT DEFECT NOTIFICATION FORM

BELLSOUTH DEFECT NOTIFICATION

PREPARED BY:	DATE PREPARED
CHANGE CONTROL MANAGEMENT TEAM	3/7/00

CHANGE REQUEST ID: DEF030100_001

DATE IDENTIFIED: 3/1/00

INTERFACES IMPACTED: ☒EDI ☒TAG ☒LENS

DOCUMENTATION IMPACTED: ☒YES   ☐NO

EXPLANATION OF DEFECT:

During the development of OSS99, the end user room field and the end user building field were inadvertently reduced in character length. As a result, this defect has caused some orders to be clarified based on the end user field exceeding the current field size of 9 alpha/numeric characters. An example of this is: EU-ROOM = SUIT 509-B In this example, the data is 10 characters causing a clarification on the end user room data.

The TCIF-7 mapping is not impacted by this change.

WORKAROUND: The current workaround for this issue is to submit the end user room without the "suit" identifier. An example of this is EU-ROOM with data 509-B instead of SUIT 509-B.

RESOLUTION: The resolution to this defect is proposed for the 4/15/00 release.

ATTACHMENT C page 6

Bradbury,J M (Jay) - LGA

From: Change.Control@bridge.bellsouth.com
Sent: Thursday, March 09, 2000 3:31 PM
To: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com; PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com; tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com; mconquest@itcdeltacom.com; CPolizzotti@northpoint.net; Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc; Craig.B.Douglas@MCI.com; kelley.dunne@onepointcom.com; jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com; george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com; lhall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com; sjenning@nowcommunications.com; Sandrajf@intetech.com; Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com; dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net; Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com; Lminasola@Mediaone.com; wmontano@uslec.com; Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com; allison.oneill@wcom.com; Debra.Pasquale@btitele.com; dpetry@ix.netcom.com; brian.powers@onepointcom.com; microsun@bellsouth.net; cheryl@eatel.com; jeffrey@cellularsouth.com; srober@kmctelecom.com; davidr@omnicall.net; sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com; donnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM; Mark.E.Turner@MCI.com; tvercellotti@mantiss.com; WWalker@mantiss.com; Kimberly.O.Williams@MCI.com; Williamson,Jill R - NCAM; Wilson Jr,Jack T (Tom) - BGM; wolfsbrg@cris.com
Subject: Defect Notification Update - DEF030100_001

CLECS,

On March 8, a defect notification response(DEF030100_001)was distributed to you regarding the "EU-ROOM" field size. In our response, we classified this as a "defect" when in fact it has been determined that this field was designed and implemented according to the original user requirements.

This has been re-classifed as a "feature" and is still proposed to be implemented on April 15, 2000.

Change Control Team

ATTACHMENT C page 7

1

From:	Change.Control@bridge.bellsouth.com
Sent:	Thursday, March 09, 2000 3:43 PM
To:	Williamson,Jill R - NCAM
Cc:	Change.Control@bridge.bellsouth.com; Pat.A.Rand@bridge.bellsouth.com; Beverly.Sheltonwilliams@bridge.bellsouth.com; Linda.Tate3@bridge.bellsouth.com
Subject:	RE: DEFECT - ROOM

W

DEF030-2.DOC

Jill,

After further investigation into your defect notification that you sent
to us concerning the "EU-ROOM" field size, it has been determined that
this is a "feature" instead of a "defect". This is due to the fact
that the "EU-ROOM" field size was designed and implemented according
to the original user requirements.

An expansion of this field is still planned for April 15, 2000.

Thank you.

Change Control Team

1

ATTACHMENT C page 8

From:	jrwilliamson@att.com
Sent:	Monday, March 13, 2000 3:43 PM
To:	sr271lib@lga.att.com; bradbury@att.com; mrule@att.com; sockleberry@att.com; augier@att.com; kmcallorum@att.com; bobik@att.com; bkgrant@att.com; bpeacock@att.com; cm8@att.com; donaldcrosby@att.com; jimcampbell@att.com
Subject:	FW: Defect Notification Update - DEF030100_001
Importance:	High

-----Original Message-----
From: Williamson, Jill R, NCAM
Sent: Saturday, March 11, 2000 7:14 PM
To: 'Change.Control@bridge.bellsouth.com';
sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com;
PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com;
tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com;
mconquest@itcdeltacom.com; CPolizzotti@northpoint.net;
Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc;
Craig.B.Douglas@MCI.com; kelley.dunne@onepointcom.com;
jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com;
george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com;
lhall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com;
sjenning@nowcommunications.com; Sandrajf@intetech.com;
Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com;
dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net;
Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
Lminasola@Mediaone.com; wmontano@uslec.com;
Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;
allison.oneill@wcom.com; Debra.Pasquale@btitele.com;
dpetry@ix.netcom.com; brian.powers@onepointcom.com;
microsun@bellsouth.net; cheryl@eatel.com; jeffrey@cellularsouth.com;
srober@kmctelecom.com; davidr@omnicall.net; sharon.russo@btitele.com;
brutter@kpmg.com; shane@eatel.com; donnas@intetech.com;
steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM;
Mark.E.Turner@MCI.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
Kimberly.O.Williams@MCI.com; JtWilson2@att.com; wolfsbrg@cris.com;
'Shelton-Williams, Beverly'; 'Linda W. Tate'
Subject: RE: Defect Notification Update - DEF030100_001
Importance: High

Valerie,

I disagree with BellSouth's assessment that the Room and Building field
lengths should not have been classified as a defect. Although BellSouth may
have designed the field lengths to be only 9 characters long, the fact is
that when a BellSouth RSAG valid address was populated in the field, the
order failed. When a CLEC cannot process an order based on specs provided
by BellSouth, it is a defect. This same issue applies to my other Defect
Request - Pre-order/order field discrepancies. There are many fields in my
request where the pre-order field can be longer than the order field. If
BellSouth does not resolve this issue soon, we will find ourselves unable to
process orders because of the discrepancy. Given this, I am leaving my
request as a Defect and expect that it will be handled as such. In our next
discussion around the Change Control Process, I'd like to propose that the
team address the definition of "defect".

Additionally, in trying to use the defect process, I've found that there are
instances where an issue arises that is probably not a defect, but requires
more urgent attention that the full cycle change request process allows.
I'd like to also propose discussing this classification of requests at our
next Change Control meeting, as well.

I appreciate your immediate attention to this matter.

ATTACHMENT C page 9

1

Sincerely,

Jill Williamson
AT&T Local Services and Access Management

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Thursday, March 09, 2000 3:31 PM
To: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com;
PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com;
tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com;
mconquest@itcdeltacom.com; CPolizzotti@northpoint.net;
Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc;
Craig.B.Douglas@MCI.com; kelley.dunne@onepointcom.com;
jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com;
george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com;
lhall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com;
sjenning@nowcommunications.com; Sandrajf@intetech.com;
Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com;
dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net;
Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
Lminasola@Mediaone.com; wmontano@uslec.com;
Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;
allison.oneill@wcom.com; Debra.Pasquale@btitele.com;
dpetry@ix.netcom.com; brian.powers@onepointcom.com;
microsun@bellsouth.net; cheryl@eatel.com; jeffrey@cellularsouth.com;
srober@kmctelecom.com; davidr@omnicall.net; sharon.russo@btitele.com;
brutter@kpmg.com; shane@eatel.com; donnas@intetech.com;
steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM;
Mark.E.Turner@MCI.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
Kimberly.O.Williams@MCI.com; Williamson, Jill R, NCAM; Wilson Jr, Jack T
(Tom), BGM; wolfsbrg@cris.com
Subject: Defect Notification Update - DEF030100_001

CLECS,

On March 8, a defect notification response(DEF030100_001)was distributed
to you regarding the "EU-ROOM" field size. In our response, we classified
this as a "defect" when in fact it has been determined that this field was
designed and implemented according to the original user requirements.

This has been re-classifed as a "feature" and is still proposed to be
implemented on April 15, 2000.

Change Control Team

ATTACHMENT L page 10

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Monday, March 13, 2000 3:44 PM
To: sr271lib@lga.att.com; bradbury@att.com; mrule@att.com; augier@att.com; bpeacock@att.com; cm8@att.com; donaldcrosby@att.com; jimcampbell@att.com; follensbee@att.com; kmcallorum@att.com; bobik@att.com; bkgrant@att.com
Subject: FW: Defect Notification Update - DEF030100_001

-----Original Message-----
From: Linda.Tate3@bridge.bellsouth.com
[mailto:Linda.Tate3@bridge.bellsouth.com]
Sent: Monday, March 13, 2000 10:04 AM
To: Williamson, Jill R, NCAM
Cc: allison.oneill@wcom.com; brian.powers@onepointcom.com;
brutter@kpmg.com; bszafran@covad.com; c_and_m@bellsouth.net;
cheryl@eatel.com; Change.Control@bridge.bellsouth.com;
CPolizzotti@northpoint.net; Craig@exceleron.com;
Craig.B.Douglas@MCI.com; davidr@omnicall.net; dbraun@adelphia.com;
Debra.Pasquale@btitele.com; dfoust@deltacom.com; dlasher@eftia.com;
DoBeck@Mediaone.com; donnas@intetech.com; dpetry@ix.netcom.com;
Gary@CSII.net; generalg@cris.com; george@accesscomm.com;
jason.estep@adelphiacom.com; Jdavid4715@aol.com; JDoherty@accessone.cc;
jeffrey@cellularsouth.com; jhoze@kmctelecom.com;
JMMaxwell@Intermedia.com; JOSEPH.ONEAL@adelphiacom.com; Wilson Jr, Jack
T (Tom), BGM; kelley.dunne@onepointcom.com; Kimberly.O.Williams@MCI.com;
kmiller@northpointcom.com; lhall@floridadigital.net;
Lminasola@Mediaone.com; Mark.E.Turner@MCI.com;
mconquest@itcdeltacom.com; microsun@bellsouth.net;
Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@Mediaone.com;
Pkingborn@eztalktelephone.com; sandra.k.evans@mail.sprint.com;
Sandrajf@intetech.com; sbowling@caprock.com; shane@eatel.com;
sharon.arnett@mail.sprint.com; sharon.russo@btitele.com;
Beverly.Sheltonwilliams@bridge.bellsouth.com;
sjenning@nowcommunications.com; srober@kmctelecom.com;
steve.taff@allegiancetelecom.com; Linda.Tate3@bridge.bellsouth.com;
TAYLORJG@LCI.COM; tbrooks@mantiss.com; TLA@MAGICNET.NET; Todd@CSII.net;
tvercellotti@mantiss.com; Tyra.Colbert@wcom.com;
wmknapek@Intermedia.com; wmontano@uslec.com; wolfsbrg@cris.com;
WWalker@mantiss.com
Subject: RE: Defect Notification Update - DEF030100_001

Jill,

The reason this is not a defect and is a change request is based on the fact
that the code for Room and Building Length was implemented based upon the
(CLEC
and BLS) agreed to OBF requirements. Shame on us for not realizing that the
OBF
requirement did not meet our regional needs. With that being said, this
particiular item is being handled expeditiously. Also the pre-order and
order
length issues are being addressed.

BellSouth's goal is to provide an interface that meets the CLEC's business
needs. Our intent is not to hold up your progress and I do agree there will
be
times in the future that we will have to handle some change requests on an
accelerated path base on the maginatude of the problem.

Bottomline, regardless of the which form you choose to submit or re-submit
for
this item it will be handled.

Thanks,

ATTACHMENT C page 11

1

Linda W. Tate

=->Valerie,
=->
=->I disagree with BellSouth's assessment that the Room and Building field
=->lengths should not have been classified as a defect. Although BellSouth may
=->have designed the field lengths to be only 9 characters long, the fact is
=->that when a BellSouth RSAG valid address was populated in the field, the
=->order failed. When a CLEC cannot process an order based on specs provided
=->by BellSouth, it is a defect. This same issue applies to my other Defect
=->Request - Pre-order/order field discrepancies. There are many fields in my
=->request where the pre-order field can be longer than the order field. If
=->BellSouth does not resolve this issue soon, we will find ourselves unable to
=->process orders because of the discrepancy. Given this, I am leaving my
=->request as a Defect and expect that it will be handled as such. In our next
=->discussion around the Change Control Process, I'd like to propose that the
=->team address the definition of "defect".
=->
=->Additionally, in trying to use the defect process, I've found that there are
=->instances where an issue arises that is probably not a defect, but requires
=->more urgent attention that the full cycle change request process allows.
=->I'd like to also propose discussing this classification of requests at our
=->next Change Control meeting, as well.
=->
=->I appreciate your immediate attention to this matter.
=->
=->Sincerely,
=->
=->Jill Williamson
=->AT&T Local Services and Access Management
=->
=->-----Original Message-----
=->From: Change.Control@bridge.bellsouth.com
=->[mailto:Change.Control@bridge.bellsouth.com]
=->Sent: Thursday, March 09, 2000 3:31 PM
=->To: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com;
=->PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com;
=->tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com;
=->mconquest@itcdeltacom.com; CPolizzotti@northpoint.net;
=->Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc;
=->Craig.B.Douglas@MCI.com; kelley.dunne@onepointcom.com;
=->jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com;
=->george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com;
=->lhall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com;
=->sjenning@nowcommunications.com; Sandrajf@intetech.com;
=->Pkingborn@eztalktelephone.com; wmknapek@intermedia.com;
=->dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net;
=->Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
=->Lminasola@Mediaone.com; wmontano@uslec.com;
=->Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;
=->allison.oneill@wcom.com; Debra.Pasquale@btitele.com;
=->dpetry@ix.netcom.com; brian.powers@onepointcom.com;
=->microsun@bellsouth.net; cheryl@eatel.com; jeffrey@cellularsouth.com;
=->srober@kmctelecom.com; davidr@omnicall.net; sharon.russo@btitele.com;
=->brutter@kpmg.com; shane@eatel.com; donnas@intetech.com;
=->steve.taff@alleglancetelecom.com; TAYLORJG@LCI.COM;

ATTACHMENT C page 12

2

=->Mark.E.Turner@MCI.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
=->Kimberly.O.Williams@MCI.com; Williamson, Jill R, NCAM; Wilson Jr, Jack T
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=->Subject: Defect Notification Update - DEF030100_001
=->
=->
=->CLECS,
=->
=->On March 8, a defect notification response(DEF030100_001)was distributed
=->to you regarding the "EU-ROOM" field size. In our response, we
classified
=->this as a "defect" when in fact it has been determined that this field
was
=->designed and implemented according to the original user requirements.
=->
=->This has been re-classifed as a "feature" and is still proposed to be
=->implemented on April 15, 2000.
=->
=->Change Control Team
=->
=->

ATTACHMENT C page 13

<u>**CERTIFICATE OF SERVICE**</u> - 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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This 23rd day of March, 2000.

_____
Suzanne W. Ockleberry